

Decision 08-05-015 May 15, 2008

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Policies, Procedures and Rules for California Solar Initiative, the Self-Generation Incentive Program and Other Distributed Generation Issues.

Rulemaking 06-03-004
(Filed March 2, 2006)

**DECISION GRANTING INTERVENOR COMPENSATION
TO A WISH AND GREENLINING FOR CONTRIBUTIONS TO CALIFORNIA
SOLAR INITIATIVE RULEMAKING**

1. Summary

The decision awards the A World Institute for a Sustainable Humanity (A WISH) \$45,281.75 in compensation for its substantial contribution to Decision (D.) 07-11-045. This is a reduction from A WISH's requested compensation of \$60,831.75, reflecting an adjustment to hourly rates for A WISH's expert, removal of some expenses, and other corrections.

This decision also awards Greenlining Institute (Greenlining) \$7,124.85 in compensation for substantial contributions to D.07-11-045. This is a decrease from Greenlining's requested compensation of \$13,683.60. The reduction reflects an adjustment to the requested hourly rates for Greenlining attorneys and representatives, and reductions to the hours claimed by Greenlining.

2. Background

This Commission initiated this rulemaking to develop rules and procedures for the California Solar Initiative (CSI) and the Self-Generation

Incentive Program (SGIP), and to consider policies for the development of cost-effective, clean and reliable distributed generation.

The Scoping Memo of April 25, 2006, divided this proceeding into three phases. Phase I has dealt with issues requiring immediate resolution to implement the CSI in 2007 such as adoption of performance-based incentives, metering requirements, and an administrative structure. Phase II addressed additional CSI and distributed generation issues including treatment of distributed generation output for renewable energy credits, a solar research, development and demonstration program, and solar incentives for low-income homeowners.

D.07-11-045, for which Greenlining and A WISH seek compensation, established a \$108 million solar incentive program for low-income homeowners, providing full subsidies for one kilowatt solar energy systems to existing owner-occupied households that qualify as extremely or very low-income, and partial subsidies for solar energy systems to other qualifying owner-occupied low-income homes. It also established performance and energy efficiency requirements for the program, and set up a process for hiring an administrator to manage the program statewide in the service territories of Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E).

A WISH and Greenlining actively participated in the proceeding by filing numerous pleadings and appearing at workshops leading to D.07-11-045. A WISH seeks \$60,831.75 for its contributions to D.07-11-045. Greenlining seeks \$13,683.60 for its contributions to that order.

3. Requirements for Award of Compensation

The intervenor compensation program, enacted in Pub. Util. Code §§ 1801-1812,¹ requires California jurisdictional utilities to pay the reasonable costs of an intervenor's participation if the intervenor makes a substantial contribution to the Commission's proceedings. Section 1807 provides that the utility may adjust its rates to collect the amount awarded from its ratepayers.

All of the following procedures and criteria must be satisfied for an intervenor to obtain a compensation award:

1. The intervenor must satisfy certain procedural requirements including the filing of a sufficient notice of intent to claim compensation within 30 days of the prehearing conference, or in special circumstances at other appropriate times that we specify. (§ 1804(a).)
2. The intervenor must be a customer or a participant representing consumers, customers, or subscribers of a utility subject to our jurisdiction. (§ 1802(b).)
3. The intervenor should file and serve a request for a compensation award within 60 days of our final order or decision in a hearing or proceeding. (§ 1804(c).)
4. The intervenor must demonstrate "significant financial hardship." (§§ 1802(g), 1804(b)(1).)
5. The intervenor's presentation must have made a "substantial contribution" to the proceeding, through the adoption, in whole or in part, of the intervenor's contention or recommendations by a Commission order or decision. (§§ 1802(i), 1803(a).)
6. The claimed fees and costs must be reasonable (§ 1801), necessary for and related to the substantial contribution (D.98-04-059),

¹ Unless otherwise indicated, all subsequent statutory references are to the Public Utilities Code.

comparable to the market rates paid to others with comparable training and experience (§ 1806), and productive (D.98-04-059).

We address each below.

4. Procedural Issues

Greenlining, and A WISH timely filed their notices of intent to claim compensation and demonstrated significant financial hardship for participation in the proceeding. The assigned Administrative Law Judge (ALJ) subsequently issued a ruling finding that Greenlining and A WISH were eligible to claim intervenor compensation and that each met the definition of a customer pursuant to § 1802(b)(1)(C) and demonstrated significant financial hardship according to § 1802(g). A WISH and Greenlining filed their subject requests for compensation within 60 days of D.07-11-045, consistent with the timing requirements of § 1804(c). Greenlining and A WISH have satisfied all the procedural requirements necessary to make a request for compensation in this proceeding.

5. Substantial Contribution

In evaluating whether a customer made a substantial contribution to a proceeding we look at several things. First, we consider whether the Commission adopted one or more of the factual or legal contentions, or specific policy or procedural recommendations put forward by the customer. (§ 1802(i).) Second, we look at whether the customer's contentions or recommendations paralleled those of another party, and, if so, consider whether the customer's participation materially supplemented, complemented, or contributed to the presentation of the other party in ways that assisted the Commission in making its decision. Section 1801.3(f) requires an intervenor to avoid unnecessary participation that duplicates similar interests that are adequately represented by another party, or unnecessary for a fair determination of the proceeding.

Section 1802.5, however, allows an intervenor to be eligible for full compensation if its participation materially supplements, complements, or contributes to that of another party if the intervenor makes a substantial contribution to the Commission order.

As described in § 1802(i), the assessment of whether the customer made a substantial contribution requires the exercise of judgment.

In assessing whether the customer meets this standard, the Commission typically reviews the record, composed in part of pleadings of the customer and, in litigated matters, the hearing transcripts, and compares it to the findings, conclusions, and orders in the decision to which the customer asserts it contributed. It is then a matter of judgment as to whether the customer's presentation substantially assisted the Commission.²

Should the Commission not adopt any of the customer's recommendations, compensation may be awarded if, in the judgment of the Commission, the customer's participation substantially contributed to the decision or order. For example, if a customer provided a unique perspective that enriched the Commission's deliberations and the record, the Commission could find that the customer made a substantial contribution.

With this guidance in mind, we turn to the compensation requests of A WISH and Greenlining.

6. A WISH's Compensation Request

A WISH asserts it made substantial contributions to our resolution of several issues in D.07-11-045. While not all of A WISH's positions were adopted,

² D.98-04-059, 79 CPUC2d 628 at 653.

we find that A WISH made a substantial contribution to D.07-11-045 in several areas, as we discuss below.

6.1. Analysis of Substantial Contributions

Program Administration and the Use of Community Service Providers

A WISH describes how it contributed to D.07-11-045 by advocating for a single administrator to coordinate solar programs, achieve savings in bulk purchases, and coordinate with the network of community service providers. D.07-11-045 describes the contributions of A WISH on the benefits of a single administrator, coordinating low-income solar incentives and program design with Low-Income Home Energy Assistance Program Providers and Low-Income Energy Efficiency programs.

Throughout the proceeding, A WISH commented that the role of the network of community service providers was essential in program delivery, as well as emphasizing the existing statutory requirements of using this network, including for job skills development. D.07-11-045 recognizes this contribution by requiring the program manager to work with a network of service providers and community based organizations to provide service throughout the territories of the three large investor-owned utilities.

Job Skills Development and the Level of Subsidies for the Poorest Customers

A WISH describes how it advocated for the development of job skills in solar and new technologies, which reflects its view that low-income communities should benefit as participants in California's solar and environmental initiatives. A WISH detailed the need for job skills training and the statutory basis to make job skills training through the network of community services providers. D.07-

11-045 recognizes this contribution by agreeing that the solar program should provide training opportunities in low-income communities.

In addition, A WISH advocated for full subsidies for those customers whose income was so low that they would not have discretionary income or the credit needed to finance solar projects. D.07-11-045 adopted this position and allocated 20% of program funds for the lowest income participants, acknowledging the lowest income households should not be expected to take on additional debt. The order also adopted A WISH's suggestion that the program's incentives be adjusted as necessary following initial implementation.

Coordination with Low-Income Energy Efficiency and Other Programs as a Pre-Condition for CSI Participation

A WISH states it advocated for a policy that weatherization measures be installed through the low-income energy efficiency program prior to solar installations in order to promote the efficient and effective use of energy resources and ensure that the solar installation is not larger than necessary. As A WISH recommended, D.07-11-045 required coordination with energy efficiency programs and energy efficiency improvements as a pre-condition for participation in the CSI. The decision also adopted A WISH's suggestion that all "feasible" measures be installed rather than all "applicable" measures. The order also adopted A WISH's recommendation to eliminate the requirement for a two-year payback period.

Potential Effects of Time of Use Meters

A WISH explains how it expressed concern that time-of-use meters could have a detrimental impact on the most vulnerable customers: seniors at home, families with small children, the disabled, and those with little flexibility in energy use. D.07-11-045 recognizes A WISH's concern. Although the decision

did not adopt A WISH's suggestion that time-of-use meters be neutral or beneficial for the low-income customer, D.07-11-045 recognized the potential for unintended consequences and requires the effects of the meters be considered.

Benefits of the CSI to the Low-Income Single Families

A WISH states it advocated for a program that would emphasize benefits to low-income customers and avoid unintended consequences that might create costs or liabilities for those customers. D.07-11-045 consistently recognized the need to benefit the lowest income ratepayers by requiring full subsidies for the poorest customers, directing that low-income communities benefit from job development and ordering the renewable energy credit remain with the customer.

Productivity

A WISH demonstrates that it made a substantial contribution to D.07-11-045, which adopted most of A WISH's recommendations and perspectives. As A WISH explains, even where the Commission did not adopt its positions, A WISH's work in the proceeding informed the record and was considered as part of the Commission's deliberations. A WISH also appears to have made a reasonable effort to avoid duplication of effort. In a proceeding involving multiple participants, it is virtually impossible to completely avoid some duplication of the work of other parties. We find A WISH's work provided distinct viewpoints from a consumer advocacy perspective and its work supplemented, complemented, and contributed to the overall development of the record regarding implementation of CSI. Although it is difficult to assign quantifiable benefits to A WISH's participation, we find that A WISH's participation in this proceeding was productive, and bears a reasonable relationship to the benefits that ratepayers should realize from its participation.

We appreciate A WISH’s thoughtful and pragmatic advocacy on behalf of low-income ratepayers in pursuit of clean energy program development.

6.2. Reasonableness of A WISH’s Requested Compensation

A WISH requests \$60,831.75 for its participation in this proceeding. However, A WISH’s filing contained calculation errors which we correct here, based on documents provided as Appendices B (Hours for Susan Brown) and C (Hours for Michael Karp) to the Request.

In the table below, we correct Karp’s hours to reflect the 66 hours on his timesheet, and we separate work by Karp and Brown on issues of the proceeding, work on intervenor compensation matters, travel time and clerical time. We recalculate the request in accordance with these changes. The amount of A WISH’s claim, as corrected, is \$52,543.00.

Work on Issues of the Proceeding

Name	Year	Hours	Rate	Total
Susan Brown, attorney	2007-08	70.35	\$400.00	\$28,140.00
Michael Karp, expert	2007	56.25	\$290.00	\$16,312.50
Chuck Eberdt, expert	2007	5.00	\$150.00	\$ 750.00
Subtotal:				\$45,202.50
Intervenor Compensation Matters				
Susan Brown, attorney	2007-08	19.85	\$200.00	\$ 3,970.00
Michael Karp, expert	2007	9.75	145.00	\$ 1,413.75
Subtotal:		29.6		\$ 5,383.75
Travel				
Susan Brown, attorney	2007	.75	\$200.00	\$ 150.00
Other Fees				
Clerical (Susan Brown)	2007	4.00	\$400.00	\$ 1,600.00
Costs				
Copies				\$ 130.70
Parking at Workshop				\$ 10.00
Supplies				\$ 66.05
Subtotal				\$ 206.75
TOTAL REQUEST				\$52,543.00

In general, the components of this request must constitute reasonable fees and costs of the customer's preparation for and participation in a proceeding that resulted in a substantial contribution. The issues we consider to determine reasonableness are discussed below.

6.2.1. A WISH's Hours and Costs

We first assess whether the hours claimed for the customer's efforts that resulted in a substantial contribution to the Commission decision are reasonable by determining to what degree the hours and costs are related to the work performed and necessary for the substantial contribution.

Exhibit A of A WISH's request for compensation contains daily records of hours of A WISH's attorney and clerk with a brief description of each specific task performed. Exhibit A provides adequate justification for the costs for which A WISH seeks compensation and demonstrates that A WISH appropriately billed for work on the compensation request at one half the rate. A WISH, however, claims compensation for 29.6 hours of work on the compensation request. This is an excessive amount of time to complete a short compensation request relating to a single Commission decision. We do not reduce A WISH for this work but expect more efficient use of time for this task in future requests.

A WISH's request includes compensation for travel time of attorney Susan Brown, and travel expenses. Susan Brown lives in the Bay Area. Her travel time includes trips to and from San Francisco. We disallow Brown's .75 hours charged for travel time, and her parking fee. As we stated in D.07-04-010:

An intervenor's fees are assumed to cover such overhead costs, just as they cover administrative costs. If an intervenor has extraordinary travel costs that are reasonable and justified, such as might be incurred to attend hearings in another area of the state or

to bring in a consultant with special expertise from another part of the country, we will continue to compensate them. (*Id.*, p. 12.)

Further, A WISH requests compensation for clerical tasks described as “file and serve.” We adjust A WISH’s claim to remove the four hours Brown charges for clerical work. We consider routine administrative tasks to be overhead which should be captured in an attorney’s hourly rates, consistent with our standard practice.³

6.2.2. A WISH’s Hourly Rate

We next take into consideration whether the claimed fees and costs are comparable to the market rates paid to experts and advocates having comparable training and experience and offering similar services.

A WISH requests \$400 per hour for the work performed by Susan Brown, which is a 2.5% increase from the rate adopted for 2006 in D.06-11-009. We adopt this rate as reasonable for Brown’s work in 2007.

A WISH requests \$290 for the work of Michael Karp in 2006 and \$150 an hour for the work of its expert Chuck Eberdt. The Commission has not previously adopted rates for Karp or Eberdt.

A WISH states Karp has billed between \$220 an hour and \$280 an hour for relevant work in other states between the years of 1998 and 2003, and has more than 30 years of experience in low-income energy efficiency issues. We will award Karp \$200 per hour, which is well within the range for policy experts with this level of experience as adopted in D.07-01-009 and consistent with other experts with similar experience who appear before the Commission.

³ See, e.g., D.06-09-011, 2006 Cal. PUC LEXIS 315, *33; D.99-11-006, 1999 Cal. PUC LEXIS 657, *30.

A WISH states Eberdt has more than 15 years' experience and \$150 an hour compares to adopted rates for Sheryl Carter of the Natural Resources Defense Council and Ana Montes for Latino Issues Forum. We agree that the rate A WISH seeks for Eberdt is reasonable given his experience and the rates of other experts who appear before the Commission.

6.3. Direct Expenses

The itemized direct expenses of \$206.75 submitted by A WISH are for printing, mailing, and parking. As we have stated earlier, we disallow the cost of parking. The remaining direct expenses are reasonable and commensurate with the work performed.

6.4. A WISH's Award

We award \$45,281.75, as follows:

AWARD				
Work on Issues of the Proceeding				
Name	Year	Hours	Rate	Total
Susan Brown, attorney	2007-08	70.35	\$400.00	\$ 28,140.00
Michael Karp, expert	2007	56.25	\$200.00	\$ 11,250.00
Chuck Eberdt, expert	2007	5.00	\$150.00	<u>\$ 750.00</u>
Subtotal				<u>\$ 40,140.00</u>
Intervenor Compensation Matters				
Susan Brown, attorney	2007-08	19.85	\$200.00	\$ 3,970.00
Michael Karp, expert	2007	9.75	\$100.00	<u>\$ 975.00</u>
Subtotal		29.6		<u>\$ 4,945.00</u>
Costs				
Copies				\$ 130.70
Supplies				\$ 66.05
Subtotal				<u>\$ 196.75</u>
TOTAL AWARD				<u>\$ 45,281.75</u>

7. Greenlining’s Compensation Request

Greenlining requests \$13, 683.60 for its substantial contributions to D.07-11-045. Greenlining’s request contains calculation errors, in that Greenlining has inappropriately combined hours that Jesse Raskin and Adam Briones spent on issues of the proceeding with hours spent preparing the compensation request, at the same hourly rate. We correct the error by separating these hours and showing hours preparing the compensation request at one-half the hourly rate. The correct amount should be \$12,802.35. We will address each related issue separately below.

Work on Issues of the Proceeding			
Name	Hours	Rate	Total
Thalia N.C. Gonzalez, attorney	14.25	\$230.00	\$ 3,277.50
Jesse W. Raskin, attorney	34.50	\$190.00	\$ 6,555.00
Adam Briones, expert	16.00	\$130.00	\$ 2,080.00
Subtotal			\$ 11,912.50
Work on Intervenor Compensation Matters			
Jesse W. Raskin, attorney	8.25	\$ 95.00	\$ 783.76
Adam Briones, expert	1.50	\$ 65.00	\$ 97.50
Subtotal			\$ 881.25
	Costs		
Postage			\$ 8.60
TOTAL			\$ 12,802.35

7.1. Contributions to D.07-11-045

Greenlining contends it contributed to this order by participating in all aspects of the proceeding on behalf of low-income customers. It states it recommended several proposals adopted by the Commission, including recommendations to (1) increase access to solar technologies in low-income communities; (2) contract with a single program manager; (3) structure the program’s “sweat equity” requirement to be inclusive rather than exclusive; (4) ensure transparency in the program with regular evaluations and measurement criteria; (5) advance economic and environmental sustainability

through workforce training and development programs; and (6) ensure greater equity in the program. Greenlining states that it was the only intervenor to address these and other matters.

Greenlining did contribute to D.07-11-045, although we certainly do not agree that its contributions were unique in all cases. For example, the Commission and the State Legislature had already stated strong support for low-income solar subsidies by the time this phase of the rulemaking had been initiated. Greenlining's advocacy on behalf of program expansion, therefore, was not novel. A WISH also addressed the benefits a single program administrator and how solar technologies might promote workforce training and economic development. Moreover, Greenlining's comments and reply comments on the proposed decision did not address that proposed decision with any specificity and merely restated the positions it had presented in previous comments. These comments therefore were an inefficient use of time and were not useful in the Commission's assessment of the proposed decision.

Overall, we find Greenlining did contribute to D.07-11-045 but that its contributions were not consistently unique or useful.

7.2. Reasonableness of Greenlining's Request

Greenlining's corrected request is \$12,802.35. The components of this request must constitute reasonable fees and costs of the customer's preparation for and participation in a proceeding that resulted in a substantial contribution. The issues we consider to determine reasonableness are discussed below.

7.2.1. Hours and Costs

Greenlining requests compensation for three individuals, Jesse Raskin, Adam Briones and Thalia Gonzalez, who worked a total of 74.5 hours. Greenlining seeks compensation only for their work drafting the opening

comments and reply comments on the proposed decision and not comments filed earlier in the year in response to the ALJ's ruling. The timesheets Greenlining submits with its request suggest substantial duplication of effort, with all three of its experts reviewing the proposed decision, drafting comments and editing them. The two pleadings together comprised less than 20 pages and did not address the proposed decision with any specificity but merely reiterated comments filed in May in response to the ALJ's ruling. Because the comments on the proposed decision mainly repeated the contents of an earlier pleading, without specifically addressing the contents of the proposed decision, we would normally find the requested hours to be excessive and reduce compensable hours substantially or disallow them entirely because they did not result in work that was useful in light of the previous filings. On the other hand, Greenlining does not seek compensation for work on its original comments. We therefore permit compensation for all requested hours with two exceptions. Greenlining seeks compensation for discussions Raskin and Briones had with representatives of financial institutions that occurred after the issuance of D.07-11-045. This work did not result in a contribution to D.07-11-045 and is therefore not compensable. We disallow 2.5 hours of the work of Raskin and 2.5 hours of the work of Briones. For the same reason, we also disallow 3.5 hours of time Raskin and Briones each spent reviewing the final decision two months after its issuance.

7.2.2. Hourly Rates

Greenlining proposes the following rates for its attorneys and expert:

Briones	\$130
Gonzalez	\$230
Raskin	\$190

Greenlining states that the hourly rates it proposes are reasonable based on prevailing market rates for attorneys and experts of like experience. Greenlining's request provides biographies but does not justify the proposed rates by, for example, comparing them to the rates of other intervenors or referring to the rate ranges established in D.07-01-009. Instead Greenlining merely asserts that the rates it proposes are below market values.⁴

We would not be serving ratepayer interests if we were to automatically pass along the rates proposed by intervenors any more than if we were to uncritically approve every rate increase proposed by a utility. Because Greenlining does not adequately justify the rates of its experts and attorneys, we set its rates at the low end of the relevant range adopted in D.07-01-009, according to the training and years of experience of each attorney or expert. Briones has a year of regulatory experience and graduated from college in 2006. We will not classify Briones as an expert in his field, given his limited experience. Instead, we will award him \$100 per hour as an advocate, on par with our award to CARE's advocates Boyd, Brown, and Anthony in D.07-12-007. Gonzalez has been an attorney for three years. We therefore set her 2007 hourly rate at \$195. Raskin was in law school during most of his time working in this proceeding and has since graduated from law school. We set his hourly rate at \$100, consistent with our award to CARE's law clerk Roberts in D.07-12-007. This rate is

⁴ At the assigned ALJ's request for more justification of requested hourly rates, Greenlining submitted a letter augmenting its request. The letter provides additional background about the education and experience of each attorney and expert but does not otherwise justify the rates it seeks. The letter, dated February 22, 2008, was included in the formal file of this proceeding.

reasonable considering that Raskin had not practiced law at the time he worked on this proceeding.

This is not the forum for debating the merits of the policies and guidelines we have established for intervenor compensation. Requests for compensation must justify the amounts sought according to those policies and guidelines, which Greenlining did not do. We therefore set hourly rates at the lowest reasonable level, consistent with our duty to protect ratepayers.

7.2.3. Direct Expenses

Greenlining submits itemized direct expenses of \$8.60 for postage. We find these costs reasonable.

7.3. Award

Greenlining should receive \$7,124.85 compensation as follows:

AWARD				
Name	Year	Hours	Rate	Total
Thalia N.C. Gonzalez, attorney	2007	14.25	\$195.00	\$2,778.75
Jesse W. Raskin, law clerk	2007	28.50	\$100.00	\$2,850.00
Adam Briones, advocate	2007	10.00	\$100.00	\$1,000.00
Subtotal				\$6,628.75
Work on Intervenor Compensation Matters				
Name	Year	Hours	Rate	Total
Jesse W. Raskin, law clerk	2007	8.25	\$50.00	\$ 412.50
Adam Briones, advocate	2007	1.5	\$50.00	\$ 75.00
Subtotal				\$ 487.50
Costs				
Postage				\$ 8.60
TOTAL AWARD				\$7,124.85

8. Interest on Awards

Consistent with previous Commission decisions, we order that interest be paid on the award amounts (at the rate earned on prime, three-month commercial paper as reported in Federal Reserve Statistical Release H.15) commencing on the 75th day after Greenlining, A WISH, and Greenlining individually filed their compensation requests, and continuing until full payment of the award is made.

We direct PG&E, SDG&E and SCE to allocate payment responsibility amongst themselves based upon their California-jurisdictional electric revenues for the 2007 calendar year.

We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. A WISH's, and Greenlining's records should identify specific issues for which they have requested compensation, the actual time spent by each employee or consultant, the applicable hourly rate, fees paid to consultants, and any other costs for which compensation was claimed.

9. Waiver of Comment Period

This is an intervenor compensation matter. Accordingly, as provided by Rule 14.6(c)(6) of the Commission's Rules of Practice and Procedure, we waive the otherwise applicable 30-day public review and comment period for this decision.

10. Assignment of Proceeding

Michael R. Peevey is the assigned Commissioner, and Dorothy Duda is the assigned ALJ for this portion of the proceeding.

Findings of Fact

1. A WISH has satisfied all the procedural requirements necessary to claim compensation in this proceeding.
2. A WISH made a substantial contribution to D.07-11-045, as described herein.
3. A WISH requested hourly rates for its representative that are reasonable.
4. A WISH requested related expenses that, except as noted herein, are reasonable and commensurate with the work performed.
5. Greenlining has satisfied all the procedural requirements necessary to claim compensation in this proceeding.
6. Greenlining made a substantial contribution to D.07-11-045, as described herein.
7. Greenlining requested hourly rates for its representative that, as adjusted herein, are reasonable.
8. Greenlining's related expenses and hours, as adjusted herein, are reasonable and commensurate with the work performed.

Conclusions of Law

1. A WISH has fulfilled the requirements of §§ 1801-1812, which govern awards of intervenor compensation, and is entitled to intervenor compensation in the amount of \$45,281.75 for its contributions to D.07-11-045.
2. Greenlining has fulfilled the requirements of §§ 1801-1812, which govern awards of intervenor compensation, and is entitled to intervenor compensation in the amount of \$7,124.85 for substantial contributions to D.07-11-045.
3. This decision should be effective today so that A WISH and Greenlining may be compensated without further delay.

O R D E R

IT IS ORDERED that:

1. A World Institute for a Sustainable Humanity (A WISH) is awarded \$45,281.75 as compensation for its substantial contribution to Decision (D.) 07-11-045.

2. Greenlining Institute (Greenlining) is awarded \$7,124.85 as compensation for its contribution to D.07-11-045.

3. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and Southern California Edison Company (SCE) shall pay A WISH and Greenlining the awards granted herein. PG&E, SDG&E, and SCE shall allocate payment responsibility based on their California-jurisdictional electric revenues for the 2007 calendar year. Payment of the awards shall include interest at the rate earned on prime, three-month commercial paper as reported in Federal Reserve Statistical Release H.15, beginning on the 75th day after compensation requests were filed, as indicated below, and continuing until full payment of the award is made. A WISH's interest payments shall begin accruing on March 31, 2008. Greenlining's interest payments shall begin accruing on April 2, 2008.

4. This proceeding shall remain open for further consideration of Phase II issues.

This order is effective today.

Dated May 15, 2008, at San Francisco, California.

MICHAEL R. PEEVEY
President
DIAN M. GRUENEICH
JOHN A. BOHN
RACHELLE B. CHONG
TIMOTHY ALAN SIMON
Commissioners

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D0805015	Modifies Decision? No
Contribution Decision(s):	D0711045, low-income solar incentives.	
Proceeding(s):	R0603004	
Author:	ALJ Duda	
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company	

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier ?	Reason Change/Disallowance
A WISH		\$52,243.00	\$45,281.75	No	<ul style="list-style-type: none"> • Failure to justify hourly rate; • Calculation errors; and • Clerical time, travel time and parking not compensable.
Greenlining	1/17/08	\$12,802.35	\$7,124.85	No	<ul style="list-style-type: none"> • Hours for post-decision work and meetings with financial institutions not compensable; and • Failure to justify hourly rates.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Susan	Brown	Attorney	A WISH	\$400	07	\$400
Michael	Karp	Expert	A WISH	\$290	07	\$200
Chuck	Eberdt	Expert	A WISH	\$150	07	\$150
Thalia	Gonzales	Attorney	Greenlining	\$230	07	\$195
Adam	Briones	Advocate	Greenlining	\$130	07	\$100
Jesse	Raskin	Law Clerk	Greenlining	\$190	07	\$100

(END OF APPENDIX)