



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Application of PACIFIC GAS AND ELECTRIC COMPANY for Approval of Modifications to its SmartMeter™ Program and Increased Revenue Requirements to Recover the Costs of the Modifications (U39M)	Application 11-03-014 (Filed March 24, 2011)
And Related Matters.	Application 11-03-015 Application 11-07-020

**NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION
AND, IF REQUESTED (and [X]¹ checked), ADMINISTRATIVE LAW
JUDGE’S RULING ON [ALLIANCE FOR HUMAN AND ENVIRONMENTAL
HEALTH]’S SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP**

Customer (party intending to claim intervenor compensation): ALLIANCE FOR HUMAN AND ENVIRONMENTAL HEALTH (AHEH)			
Assigned Commissioner: PEEVEY		Assigned ALJ: YIP-KIKUGAWA	
I hereby certify that the information I have set forth in Parts I, II, III and IV of this Notice of Intent (NOI) is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this NOI and has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).			
		Signature:	/s/
Date:	June 14, 2012	Printed Name:	Barry Smith

PART I: PROCEDURAL ISSUES
(To be completed by the party (“customer”) intending to claim intervenor compensation)

A. Status as “customer” (see Pub. Util. Code § 1802(b)): The party	Applies
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¹ DO NOT CHECK THIS BOX if no finding of significant financial hardship is needed (in cases where there is a valid rebuttable presumption of eligibility (Part III(A)(3)) or significant financial hardship showing has been deferred to the intervenor compensation claim).

claims "customer" status because the party (check one):	(check)
1. Category 1: Represents consumers, customers, or subscribers of any electrical, gas, telephone, telegraph, or water corporation that is subject to the jurisdiction of the Commission (§ 1802(b)(1)(A)).	
2. Category 2: Is a representative who has been authorized by a "customer" (§ 1802(b)(1)(B)).	
3. Category 3: Represents a group or organization authorized pursuant to its articles of incorporation or bylaws to represent the interests of residential customers, to represent "small commercial customers" (§ 1802(h)) who receive bundled electric service from an electrical corporation (§ 1802(b)(1)(C)), or to represent another eligible group.	X
<p>4. The party's explanation of its customer status, with any documentation (such as articles of incorporation or bylaws) that supports the party's "customer" status. Any attached documents should be identified in Part IV.</p> <p>AHEH is an unincorporated non-profit association that has registered with the California Secretary of State. The purpose section of the AHEH by-laws state, "AHEH is a coalition of concerned citizens and organizations, dedicated to the promotion and support of America's environmentally safe, reliable, cost-efficient and secure energy production, supply and delivery systems, and the ongoing education, representation, and protection of California consumers who are customers of public utility energy providers. AHEH participates in California Public Utilities Commission regulatory proceedings and other related activities to further these goals" and includes people and businesses who are PG&E customers and ratepayers and AHEH is representing their interests in this proceeding</p> <ul style="list-style-type: none"> Describe if you have any direct economic interest in outcomes of the proceeding. <p>AHEH has no direct economic interest in the outcome of this proceeding.</p>	

B. Timely Filing of Notice of Intent (NOI) (§ 1804(a)(1)):	Check
1. Is the party's NOI filed within 30 days after a Prehearing Conference? Date of Prehearing Conference: <u>May 16, 2012</u>	Yes <u>X</u> No <u> </u>
2. Is the party's NOI filed at another time (for example, because no Prehearing Conference was held, the proceeding will take less than 30 days, the schedule did not reasonably allow parties to identify issues within the timeframe normally permitted, or new issues have emerged)?	Yes <u> </u> No <u> </u>

2a. The party's description of the reasons for filing its NOI at this other time:

2b. The party's information on the proceeding number, date, and decision number for any Commission decision, Commissioner ruling, ALJ ruling, or other document authorizing the filing of NOI at that other time:

PART II: SCOPE OF ANTICIPATED PARTICIPATION
(To be completed by the party ("customer") intending to claim intervenor compensation)

A. Planned Participation (§ 1804(a)(2)(A)(i)):

- The party's statement of the issues on which it plans to participate. AHEH plans to participate in all issues raised in the Scoping Memo dated June 8, 2012. AHEH will participate in the issues of safety, community Opt-outs, possible applicability of the ADA to charges proposed for persons with disabilities and medical conditions, cost allocation questions, relevance of exposure to RF radiation and emissions to community opt-out regulations, notification of ratepayers about the Opt-Out program, adding commercial entities such as MDUs to the community Opt-Out program, and other issues of concern to AHEH.

- The party's explanation as to how it plans to avoid duplication of effort with other parties and intervenors.

AHEH is jointly represented by counsel also representing multiple local governments and real estate interests, so duplications of effort between these parties will be avoided by coordinated focus on specific issues. In addition, AHEH has commenced coordination with several other parties and in order to conserve all of our resources by defining areas of focus for the testimony and hearing portions of Phase 2.

- The party's description of the nature and extent of the party's planned participation in this proceeding (as far as it is possible to describe on the date this NOI is filed).

In coordination, and jointly wherever possible, AHEH will prepare and file briefs and testimony, and initiate discovery, jointly with coordinating parties. To the extent possible AHEH will support testimony of other party witnesses instead of presenting its own duplicative witnesses.

B. The party's itemized estimate of the compensation that the party expects to request, based on the anticipated duration of the proceeding (§ 1804(a)(2)(A)(ii)):				
Item	Hours	Rate \$	Total \$	#
ATTORNEY, EXPERT, AND ADVOCATE FEES				
[Attorney 1]	120	365	43,800	
[Attorney 2]	40	245	9,800	
[Expert 1]	60	365	21,900	
[Expert 2]				
[Advocate 1]				
[Advocate 2]				
	Subtotal:			
OTHER FEES				
Paralegal	30	140	4,200	
[Person 2]				
	Subtotal:			
COSTS				
Copying, courier, filings, postage			2,000	
[Item 2] Electronic Research			700	
	Subtotal:			
TOTAL ESTIMATE \$:			82,400	
<p>Estimated Budget by Issues: At this time the estimated budget is based on an equal allocation to each designated issue, pending results of the briefing state of Phase 2</p> <p>Comments/Elaboration (use reference # from above):</p>				
<p>When entering items, type over bracketed text; add additional rows to table as necessary.</p> <p>Estimate may (but does not need to) include estimated Claim preparation time. Claim preparation (as well as travel time) is typically compensated at ½ of preparer's normal hourly rate.</p>				

**PART III: SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP
(To be completed by party ("customer") intending to claim
intervenor compensation; see Instructions for options for
providing this information)**

A. The party claims "significant financial hardship" for its	Applies
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Intervenor Compensation Claim in this proceeding on the following basis:	(check)
1. “[T]he customer cannot afford, without undue hardship, to pay the costs of effective participation, including advocate’s fees, expert witness fees, and other reasonable costs of participation” (§ 1802(g)); or	X
2. “[I]n the case of a group or organization, the economic interest of the individual members of the group or organization is small in comparison to the costs of effective participation in the proceeding” (§ 1802(g)).	X
3. A § 1802(g) finding of significant financial hardship in another proceeding, made within one year prior to the commencement of this proceeding, created a rebuttable presumption of eligibility for compensation in this proceeding (§ 1804(b)(1)).	
ALJ ruling (or CPUC decision) issued in proceeding number: Date of ALJ ruling (or CPUC decision):	

B. The party’s explanation of the factual basis for its claim of “significant financial hardship” (§ 1802(g)) (necessary documentation, if warranted, is attached to the NOI):
The assets of AHEH are less than \$15,000. AHEH has no assured source of income other than voluntary donations, and has no assurance that adequate funds can be raised. None of the members of AHEH receive any salary or other compensation for their service.

PART IV: ATTACHMENTS DOCUMENTING SPECIFIC ASSERTIONS MADE IN THIS NOTICE
(The party (“customer”) intending to claim intervenor compensation identifies and attaches documents; add rows as necessary)

Attachment No.	Description
1	Certificate of Service
2	ALLIANCE FOR HUMAN AND ENVIRONMENTAL HEALTH ORGANIZATIONAL STATEMENT AND PROCEDURAL BY-LAWS

ADMINISTRATIVE LAW JUDGE RULING²
(ALJ completes)

	Check all that apply
1. The Notice of Intent (NOI) is rejected for the following reasons:	
a. The NOI has not demonstrated the party's status as a "customer" for the following reason(s):	
b. The NOI has not demonstrated that the NOI was timely filed (Part I(B)) for the following reason(s):	
c. The NOI has not adequately described the scope of anticipated participation (Part II, above) for the following reason(s):	
2. The NOI has demonstrated significant financial hardship for the reasons set forth in Part III of the NOI (above).	
3. The NOI has not demonstrated significant financial hardship for the following reason(s):	
4. The ALJ provides the following additional guidance (see § 1804(b)(2)):	

IT IS RULED that:

	Check all that apply
1. The Notice of Intent is rejected.	
2. Additional guidance is provided to the customer as set forth above.	
3. The customer has satisfied the eligibility requirements of Pub. Util. Code § 1804(a).	
4. The customer has shown significant financial hardship.	
5. The customer is preliminarily determined to be eligible for intervenor compensation in this proceeding. However, a finding of significant	

² An ALJ Ruling needs not be issued unless: (a) the NOI is deficient; (b) the ALJ desires to address specific issues raised by the NOI (to point out similar positions, areas of potential duplication in showings, unrealistic expectations for compensation, or other matters that may affect the customer's Intervenor Compensation Claim); or (c) the NOI has included a claim of "significant financial hardship" that requires a finding under § 1802(g).

financial hardship in no way ensures compensation.	
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Dated _____, at San Francisco, California.

ADMINISTRATIVE LAW JUDGE