

**PUBLIC UTILITIES COMMISSION**505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298**FILED**05/26/20  
02:00 PM

May 26, 2020

**Agenda ID #18473**  
**Quasi-Legislative**

TO PARTIES OF RECORD IN RULEMAKING 14-08-013 et al, and  
APPLICATION 15-07-005 et al.:

This is the proposed decision of Administrative Law Judge Robert M. Mason III. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's June 25, 2020 Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties to the proceeding may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure.

Comments must be filed, pursuant to Rule 1.13, either electronically or in hard copy. Comments should be served on parties to this proceeding in accordance with Rules 1.9 and 1.10. Electronic and hard copies of comments should be sent to ALJ Mason at [RIM@cpuc.ca.gov](mailto:RIM@cpuc.ca.gov) and to the Intervenor Compensation Program at [Icompcoordinator@cpuc.ca.gov](mailto:Icompcoordinator@cpuc.ca.gov). The current service list for this proceeding is available on the Commission's website at [www.cpus.ca.gov](http://www.cpus.ca.gov).

/s/ ANNE E. SIMON

Anne E. Simon

Chief, Administrative Law Judge

AES:avs

Attachment

Decision **PROPOSED DECISION OF ALJ MASON** (Mailed 5/26/2020)**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding Policies, Procedures and Rules for Development of Distribution Resources Plans Pursuant to Public Utilities Code Section 769.	Rulemaking 14-08-013 (Filed August 14, 2014)
And Related Matters.	Application 15-07-002 Application 15-07-003 Application 15-07-006
<b>(NOT CONSOLIDATED)</b>	
In the Matter of the Application of PacifiCorp (U901E) Setting Forth its Distribution Resource Plan Pursuant to Public Utilities Code Section 769.	Application 15-07-005 (Filed July 1, 2015)
And Related Matters.	Application 15-07-007 Application 15-07-008

**DECISION DENYING INTERVENOR COMPENSATION  
CLAIM OF CLEAN COALITION**

<b>Intervenor: Clean Coalition</b>	<b>For contribution to Decision (D.) 17-02-007</b>
<b>Claimed: \$ 157,337.50</b>	<b>Awarded: \$0.00</b>
<b>Assigned Commissioner: Marybel Batjer</b>	<b>Assigned ALJs: Robert Mason</b>

**PART I: PROCEDURAL ISSUES**

<b>A. Brief description of Decision:</b>	<p>The Commission opened this proceeding in response to the Legislature's directive that investor-owned utilities (IOUs) prepare, and submit to the Commission for approval, Distribution Resource Plans that identify optimal locations for the deployment of distributed energy resources (DERs).</p> <p>D.17-02-007 addresses Track 2 demonstration projects subsequent to Assigned Commissioner's Ruling on Guidance, Scoping, and Roadmap, and initial investor-owned utility (IOU) Distribution Resource Plan (DRP) filings, and completion and review by working group of Track 1 demonstration projects required for Track 2.</p>
--	---

**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:**

	<b>Intervenor</b>	<b>CPUC Verified</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	9/30/2015	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	10/30/2015	Verified
4. Was the NOI timely filed?		Yes
<b>Showing of eligible customer status (§ 1802(b) or eligible local government entity status (§§ 1802(d), 1802.4)):</b>		
5. Based on ALJ ruling issued in proceeding number:	R.10-05-006	A rebuttable presumption of eligibility established in R.10-05-006 has expired (§1804(b)). See CPUC's comment in Item 10, below.
6. Date of ALJ ruling:	7/19/2011	A rebuttable presumption of eligibility only applies to the proceedings initiated within a year of the date of finding of eligibility (Section 1804(b)). Accordingly, a finding of eligibility made in the July 19, 2011 ruling (R.10-05-006) does not apply to this proceeding, which started more than 3 years after that ruling.

7. Based on another CPUC determination (specify):		No
8. Has the Intervenor demonstrated customer status or eligible government entity status?		No, see CPUC's comments in Part I(C).
<b>Showing of "significant financial hardship" (§1802(h) or §1803.1(b))</b>		
9. Based on ALJ ruling issued in proceeding number:	R.10-05-006	A rebuttable presumption of eligibility stemming from the July 19, 2011 ruling (R.10-05-006) has expired (§1804(b)) (see CPUC's discussion in item 10, below).
10. Date of ALJ ruling:	7/19/2011	Under Section 1804(b), a rebuttable presumption of eligibility is only valid within a year after a finding of eligibility in another proceeding. This proceeding started more than 3 years after the ruling of July 19, 2011 issued. Therefore, the reference to the ruling here is invalid.
11. Based on another CPUC determination (specify):	See D.16-11-017.	D.16-11-017 (issued in R.11-09-011) did not make a finding of significant financial hardship pursuant to Section 1802(h). Instead, it relied on the July 19, 2011 ruling pursuant to the rebuttable presumption (Section 1804(b)). That presumption has expired and is no longer valid.
12. Has the Intervenor demonstrated significant financial hardship?		No, see CPUC's comments in Part I(C).
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.17-02-007	Verified
14. Date of issuance of Final Order or Decision:	2/16/2017	Verified
15. File date of compensation request:	4/17/2017	Verified
16. Was the request for compensation timely?		Yes

**C. Additional Comments on Part I:**

<b>Intervenor's Comment</b>	
I.B.11	The Clean Coalition sought a new finding of significant financial hardship in this proceeding through our NOI filed on October 30, 2015. However, the Commission did not issue a ruling on our request. We therefore include this citation to a recent intervenor compensation award that affirmed Clean Coalition's showing of significant financial hardship.
<b>CPUC's Comments</b>	
Part I(B) (5-8)	<p>A recent intervenor compensation award in D.16-11-017, as explained in I(B)(11) did not make a finding of significant financial hardship pursuant to Section 1802(h). Clean Coalition filed an NOI in this proceeding on October 30, 2015. In a separate proceeding, R.14-07-002, the Commission states without further discussion in D.16-05-049 that the amended NOI of March 9, 2015 demonstrated significant financial hardship. Clean Coalition does not rely on a presumptive effect of that statement on Clean Coalition's eligibility in this proceeding. However, even if Clean Coalition referred to D.16-05-049 here, new materials filed after March 9, 2015, have effectively rebutted a presumption of Clean Coalition's qualification to claim compensation.</p> <p>Since March 2015, the Commission requested, and Clean Coalition filed factual information that prompted the Commission to reassess this intervenor's standing as a customer pursuant to Section 1802(b)(1)(C). This reassessment was first performed in the Ruling issued on June 30, 2016 in A.15-02-009 (Pacific Gas and Electric Company's application for electric vehicle infrastructure program).<sup>1</sup> The Ruling found that new facts indicated that Clean Coalition primarily serves the needs of entities in the renewable energy industries and markets. Therefore, the Ruling concluded, Clean Coalition is no longer an organization representing the interests of residential customers as required in Section 1802(b)(1)(C) and has not demonstrated significant financial hardship. The Commission later denied Clean Coalition's Motion to Reconsider the Ruling.<sup>2</sup></p> <p>Recently, in D.18-11-010 (issued in R.15-02-020), the Commission examined a compendium of the facts referenced in Clean Coalition's filings, pertaining to its purposes, activities and participation in our proceedings. In that decision, the Commission determined that Clean Coalition has not demonstrated a status as a "customer" representing the interests of residential ratepayers, pursuant to Section 1802(b)(1)(C), as Clean Coalition claimed. The Commission adopted a</p>

<sup>1</sup> See, Administrative Law Judge's Ruling Rejecting Clean Coalition's Amended Notice of Intent to Claim Intervenor Compensation, issued on June 30, 2016, in A.15-02-009, at 6-10.

<sup>2</sup> D.16-12-065, directing Pacific Gas and Electric Company to establish electric vehicle infrastructure and education program, Ordering Paragraph 23 at 88.

	<p>similar analysis in D.19-03-023 (issued in R.14-10-003) and denied Clean Coalition’s request for intervenor compensation in that proceeding.</p> <p>Clean Coalition has not provided new factual information about its standing that would challenge or change our findings. Therefore, we adopt, without repeating, the pertinent analysis performed in D.19-03-023 (issued in R.14-10-003), D.18-11-010 (issued in R.15-02-020) and the June 30, 2018 ruling (issued in A.15-02-009).</p>
Part I(B) (9-12)	<p>A finding of “customer” status is a pre-requisite to a finding of significant financial hardship.<sup>3</sup> A denial of “customer” status renders the issue of financial hardship moot. Our Ruling of June 30, 2016, D.18-11-010, and D.19-03-023 all found that Clean Coalition has not demonstrated customer status, and the June 30, 2016 ruling also found that Clean Coalition has not demonstrated significant financial hardship. We will briefly discuss this issue again.</p> <p>For groups and organizations, “significant financial hardship” means that “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” (Section 1802(h)). Section 1804(b) affords a party that has received a finding of financial hardship, a presumption of such hardship in other proceedings, within certain time limits. This presumption is not absolute and can be rebutted (Section 1804(b).)</p> <p>Facts analyzed in D.19-03-023, D.18-11-010, and the June 30, 2016 Ruling show that Clean Coalition cannot demonstrate significant financial hardship. Clean Coalition’s claim that subscribers to its free newsletter are Clean Coalition’s “members” has been found unsuccessful. We have determined that Clean Coalition’s activities and advocacy target primarily the interests of the entities participating in or entering, renewable energy industry and markets, that Clean Coalition provides services to these entities, and that these services bring economic benefits to these entities and to Clean Coalition. We have further determined that these entities have significant economic interests at stake in our proceedings, and do not have cost barriers to their participation.<sup>4</sup></p> <p>The economic interests of the entities supporting Clean Coalition is not small in comparison to the costs of effective participation. Therefore, Clean Coalition is unable to pass the significant financial hardship test of Section 1802(h). Since the issuance of the Ruling of June 30, 2016, Clean Coalition has not provided factual information that would change our finding that Clean Coalition has not demonstrated significant financial hardship.<sup>5</sup> This does not preclude Clean</p>

<sup>3</sup> See D.98-04-059 at 21.

<sup>4</sup> See D.18-11-010 (R.15-02-020) and Ruling of June 30, 2016 (A.15-02-009).

<sup>5</sup> Since the June 30, 2016 ruling, Clean Coalition submitted several intervenor compensation-related documents, for example, Motion to Reconsider the June 30, 2016 Ruling, filed on August 1, 2016 (A.15-02-009); notices of ex parte communication of August 9 and 12, 2016

	<p>Coalition from submitting new factual information in a future proceeding for consideration of eligibility.</p> <p>Because we find Clean Coalition ineligible to claim intervenor compensation, the issues of substantial contribution to Decision 17-02-007 and the reasonableness of this claims are moot.</p>
--	--

## PART II: SUBSTANTIAL CONTRIBUTION

### A. Did the Intervenor substantially contribute to the final decision (*see* § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059).

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<b>Decision (D.) 17-02-007</b> addresses Track 2 demonstration projects subsequent to Assigned Commissioner's Rulings on guidance, roadmap and scoping, and initial IOU Distribution Resource Plan (DRP) filings.	Please see Attachment 2 for a listing of issue areas and relevant Clean Coalition filings.	N/A
<p><b>1. DRP Guidance Ruling</b></p> <p>The Guidance Ruling defined the initial role of R.14-08-013 in relation to Public Utilities Code Section 769 and the requirements for utility Distribution Resource Plans.</p> <p>As an originating party in 2012 Integrated Energy Policy Report (IEPR) recommendations for distribution system planning and related draft legislation, the Clean Coalition provided responses—as well as extensive input—to the questions posed in the Order Instituting Rulemaking (OIR). The subsequent Guidance Ruling adopted much of the Clean Coalition's input.</p> <p>The Clean Coalition's recommendations addressed both the scope and detailed description of methods and techniques for evaluating distribution hosting capacity, the optimal siting of</p>	<p><i>Assigned Commissioner's Ruling on Guidance for Public Utilities Code Section 769 – Distribution Resource Planning</i> (Feb. 6, 2015) adopted a number of recommendations made by the Clean Coalition, including:</p> <ul style="list-style-type: none"> <li>• Including a goal of recognizing the services offered by DER (at 3);</li> <li>• Adoption of a biennial DRP filing cycle and iterative refinement (at 4-5). <i>See also Attachment: Guidance for Section 769 – Distribution Resource Planning</i> at 11-13);</li> <li>• Including as elements of utility DRP filings: Integration Capacity and Locational Value Analysis, Demonstration and Deployment; Data Access; Tariffs and Contracts; Barriers to Deployment (at 4-5; <i>see also Attachment</i> at 3-10);</li> </ul>	N/A

(A.15-02-009); Intervenor Compensation claim filed on April 17, 2017 (R.14-08-013, et al.); Intervenor Compensation Claim filed on December 22, 2016 (R.15-02-020), etc.

<p>distributed resources, and numerous other matters.</p> <p>The Clean Coalition contributed through participation in More Than Smart (MTS) technical working group in development of utility DRP approach and methodologies, as well as the Clean Coalition presentation at the Commission's January 2015 DRP Workshop.</p>	<ul style="list-style-type: none"> <li>• Highlighting the contribution of participants in the More Than Smart initiative at 9.</li> </ul> <p><i>Clean Coalition Responses to Order Instituting Rulemaking Regarding Policies, Procedures and Rules for Development of Distribution Resources Plans</i> (Sept. 5, 2014):</p> <ul style="list-style-type: none"> <li>• Recommending the Commission adopt a goal of developing DERs that avoid alternative investments and/or provide grid services (at 3);</li> <li>• Recommending regular IOU filings and iterative refinement (at 3-4);</li> <li>• Recommending elements for inclusion in utility DRP filings (at 4-7)</li> <li>• Providing a detailed case study demonstrating a framework and methodology for optimizing DER deployments (Exhibit B, <i>[Draft] Optimizing Distributed Energy Resources in a Community Microgrid: A Methodology and Case Study</i>).</li> </ul> <p><i>Clean Coalition Reply Comments to Order Instituting Rulemaking Regarding</i> at 2-4, 7-9 (Oct. 6, 2014). <i>See also Exhibit B</i> with updated Energy Efficiency, Electric Vehicle, and Energy Storage at 15-17; study results at 22-26; methodology comparison at 29-30.</p> <ul style="list-style-type: none"> <li>• <i>Clean Coalition Comments on Assigned Commissioner's Ruling Re: Draft Guidance for Use in Utility AB 327 (2013) Section 769 Distribution Resource Plans</i> at 2-6 (Dec. 12, 2014).</li> <li>• Clean Coalition participation in the More Than Smart technical working group from 2014-15.</li> </ul>	
--	--	--



<p><b>2. Utility Distribution Resource Plans</b></p> <p>In accord with the Guidance Ruling, the IOUs each submitted a DRP application for review, comment and approval.</p> <p><i>Applications of Pacific Gas and Electric Company (U 39 E), Southern California Edison Company (U 338 E), and San Diego Gas &amp; Electric Company (U 902 E) For Approval Of Distribution Resource Plans (July 15, 2015).</i></p> <p>At the urging of the Clean Coalition and other parties, Commission staff developed a Roadmap for further DRP development reflecting workshop feedback.</p> <p>The subsequent Scoping Memo of January 27, 2016 established three tracks within the proceeding and a coordinated schedule to address the range of issues identified by Public Utilities Code Section 769 and by parties over the course of the proceeding.</p> <p>Clean Coalition and others made substantial contributions to the Commission's review and modification of the DRPs, which were incorporated in the subsequent demonstration projects, Roadmap and Scoping Memo which reflected the issues raised by the Joint Parties, outlined below.</p> <p>a) Parties requested additional clarification on the relationship and division of actions required under AB 327 between the DRP proceeding and the Integrated Demand Side Resources proceeding (R.14-10-003), and the biennial Long Term Planning and Procurement proceedings. R.14-10-003 was subsequently modified and renamed the Integrated Distributed Energy Resources to address the tariff, ownership, and business model issues,</p>	<p><b><i>Distribution Resources Plan (DRP) Roadmap Straw Proposal R. 14-08-013 at 5-6, 17-22. (Nov. 2, 2015)</i></b> addressing roles and coordination or related proceedings</p> <p><i>Clean Coalition Comments on Distribution Resources Plan Roadmap Straw Proposal at 2 (Nov. 20, 2015).</i></p> <p><b><i>Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge, Including Deconsolidation of Certain Proceedings and a Different Consolidation of Other Proceedings (Jan. 27, 2016).</i></b> The Scoping Memo and Ruling identified three tracks primary focus:</p> <ul style="list-style-type: none"> <li>• Track 1: methodological issues taken up in Demonstration Projects A and B (at 5-8)</li> <li>• Track 2: the design and authorization for Demonstration Projects C, D and E (at 8-10)</li> <li>• Track 3: policy issues including transmission savings (at 10-12).</li> </ul> <p><b>D.17-02-007</b> implementing utility DRP demonstration projects in line with the prior Guidance Ruling and Scoping Memo.</p> <p><i>Response of Bioenergy Association of California, California Association Of Sanitation Agencies, California Energy Efficiency Industry Council, Center For Sustainable Energy, Clean Coalition, Community Choice Partners, Community Environmental Council, Comverge, Inc., Energyhub, Enernoc, Inc., Enphase Energy, Environmental Defense Fund, Local Government Sustainable Energy Coalition, Marin Clean Energy, Natural Resources Defense Council, San Francisco Bay Area Regional Energy Network, Solar Energy Industries</i></p>	<p>N/A</p>
--	---	------------

<p>and DER are now being incorporated into the Integrated Resource Planning successor to LTPP.</p> <p>b) Proposed investments would duplicate or preclude the opportunity for customers, local governments, non-IOU load serving entities, or third parties to provide the same services and capabilities.</p> <p>Grid modernization investment planning was deferred to Track 3.</p> <p>c) Greater attention was requested on streamlining interconnection, and this has become a focus of the ICA.</p> <p>d) Creation of working groups to assist in the development and evaluation of Demonstration Projects A &amp; B with increased transparency in methodology.</p> <p>e) Consideration of transmission capacity cost savings attributable to DER in LNBA.</p>	<p><i>Association, Southern California Regional Energy Network, the Utility Reform Network, Vote Solar, and the World Business Academy to the Applications for Approval of Distribution Resources Plans by Pacific Gas and Electric Company (U 39 E), Southern California Edison Company (U 338 E), and San Diego Gas &amp; Electric Company (U 902 E), at 3-4, 5, 8-9 (Aug. 31, 2015).</i></p> <ul style="list-style-type: none"> <li>• <i>Clean Coalition Comments on Distribution Resources Plan Roadmap Straw Proposal at 4, 6, 7-8 (Nov. 20, 2015)</i></li> <li>• <i>Clean Coalition Comments on Distribution Resources Plan Roadmap Straw Proposal at 4-6, (Nov. 20, 2015).</i></li> <li>• <i>Clean Coalition Response on Distribution Resources Plan Locational Net Benefits Proposals at 2-4 (Jan. 26, 2016).</i></li> </ul>	
<p><b>3. ICA &amp; LNBA Working Groups and Demonstration Projects A and B.</b></p> <p>As authorized in the January 27, 2016 Scoping Memo and ACR, working group parties—including the Clean Coalition—developed Track 1 methodologies and Locational Net Benefits Assessment of DER capabilities and services, along with the Integration Capacity Analysis within the distribution system. This was essential for Demo C and D, respectively, in which these methods are to be utilized in field tests.</p> <p>The working group further identified short-term refinements in the methodology for incorporation into Track 2 demonstration projects. It also identified longer term refinements for application in future utility DRP filings and related proceedings.</p>	<ul style="list-style-type: none"> <li>• <i>Clean Coalition Post Workshop Comments on Integration Capacity Analysis and Locational Net Benefits Proposals at 2-14 (Mar. 3, 2016)</i></li> <li>• <i>Clean Coalition Response to Administrative Law Judge’s Ruling Instructing Utilities and Non-Utility Parties to Answer Data Request at 3-4, 4-6, 6-8 (May 13, 2016)</i></li> <li>• <i>Locational Net Benefit Analysis Working Group Final Report (Mar. 8, 2017) [with Clean Coalition participation].</i></li> <li>• <i>Pacific Gas and Electric Company’s (U39E) Integration Capacity Analysis Working Group Final Report (Mar. 15, 2017) [with Clean Coalition participation].</i></li> </ul>	N/A

<p>The Clean Coalition actively and consistently contributed to both working groups and development of the draft and final reports, including refinements to the methodology, use cases, data displays, and interaction with Track 3 grid investment considerations.</p> <p>The Clean Coalition's participation additionally provided continuity between related working groups on cost effectiveness in the IDER proceeding, Load Modifying Demand Response Valuation in the Demand Response proceeding, and DER use cases and application in the prior Energy Storage proceeding.</p>		
<b>4. Demonstration Projects C, D, E, and additional proposals</b>		
<p>a. Clean Coalition supported the approved utility demonstration project proposals, with some modifications.</p> <p>SCE should be required to demonstrate the cost effectiveness of their proposed communication and control proposal in Demo E.</p>	<ul style="list-style-type: none"> <li>• <b>D.17-02-007 at 19.</b></li> <li>• <i>Clean Coalition Reply Comments on Demonstration Projects C-F of the Utility AB 327 (2013) Section 769 Distribution Resource Plan at 5 (July 29, 2016)</i></li> </ul>	N/A
<p>b. Clean Coalition argued that the timelines proposed by the utilities were too lengthy, and that it is important to obtain information from Demonstration Project C results earlier than would occur under the utilities' timeline.</p>	<ul style="list-style-type: none"> <li>• <b>D.17-02-007 at 10.</b></li> <li>• <i>Clean Coalition Reply Comments on Demonstration Projects C-F of the Utility AB 327 (2013) Section 769 Distribution Resource Plan at 2-4, and at 5 (July 29, 2016)</i></li> </ul>	N/A
<p>c. Clean Coalition argued that the utilities should leverage existing DER or existing RD&amp;D projects before procuring new DER. This includes assessing the extent to which DERs are already in place and may be activated with price signals and other methods.</p>	<ul style="list-style-type: none"> <li>• <b>D.17-02-007 at 27-28.</b></li> <li>• <i>Clean Coalition Comments on Demonstration Projects C-F of the Utility AB 327 (2013) Section 769 Distribution Resource Plan at 6 (July 22, 2016).</i></li> </ul>	N/A

	<ul style="list-style-type: none"> <li><i>Clean Coalition Reply Comments on Demonstration Projects C-F of the Utility AB 327 (2013) Section 769 Distribution Resource Plan at 3-4 (July 29, 2016) .</i></li> </ul>	
d. Clean Coalition noted that the PD failed to address additional demonstration project proposals by parties.	<ul style="list-style-type: none"> <li><b>D.17-02-007 at 21-23</b></li> <li><i>Clean Coalition Reply Comments on Proposed Decision on Track 2 Demonstration Projects at 2-4 (Feb. 6, 2017).</i></li> </ul>	N/A

**B. Duplication of Effort (§ 1801.3(f) and § 1802.5):**

	<b>Intervenor's Assertion</b>	<b>CPUC Discussion</b>
<b>a. Was the Public Advocates Office a party to the proceeding?<sup>6</sup></b>	<b>Yes</b>	N/A
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	<b>Yes</b>	N/A
<b>c. If so, provide name of other parties:</b> Following more than 18 months of interaction, the following parties filed joint comments on the IOUs Distribution Resource Plans: Bioenergy Association of California, California Association of Sanitation Agencies, California Energy Efficiency Industry Council, Center For Sustainable Energy, Clean Coalition, Community Choice Partners, Community Environmental Council, Comverge, Inc., Energyhub, Enernoc, Inc., Enphase Energy, Environmental Defense Fund, Local Government Sustainable Energy Coalition, Marin Clean Energy, Natural Resources Defense Council, San Francisco Bay Area Regional Energy Network, Solar Energy Industries Association, Southern California Regional Energy Network, the Utility Reform Network, Vote Solar, and the World Business Academy.  In addition, Pacific Gas & Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company engaged with parties (including the Clean Coalition) in efforts to develop consensus positions, particularly through the More Than Smart (MTS) technical working group and later DRP working groups. The reports of these working groups and subsequent individual filings indicate that areas of both considerable agreement and difference remain.		N/A

<sup>6</sup> The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

<p><b>d. Intervenor’s claim of non-duplication:</b></p> <p>As an originating party in 2012 IEPR recommendations for distribution system planning for distributed resources and related draft legislation, the Clean Coalition occupied a special position to provide responses to the questions posed in the Order Instituting Rulemaking (OIR). The Clean Coalition’s contribution focused on both the scope and detailed description of methods and techniques for evaluating distribution hosting capacity and the optimal siting of distributed resources, among numerous other matters. The Clean Coalition brought unique and timely experience in advancing the state of the art in distribution grid modeling methods and results that were coordinated with participating utilities and their software providers. The Clean Coalition shared this experience and these tools both in the proceeding workshops and filings, and through participation in the 2014-15 MTS technical working groups as well as subsequent ICA and LNBA working groups established by the Commission. The Clean Coalition’s contributions supported development of consensus recommendations and a narrowing of the scope of issues for further refinement. The Commission adopted many of these recommendations in the Guidance Ruling, reflecting both the consensus achieved and the Clean Coalition’s individual recommendations as cited above.</p> <p>Parties undertook effective efforts resolve issues within working groups, and to provide a joint written response to the Distribution Resource Plans filed by the IOUs, greatly reducing the number of responses, duplication of effort, and total hours by each party.</p> <p>In all filings, the Clean Coalition coordinated with parties to avoid duplication of effort and focused only on issues not addressed by other parties or areas of special technical expertise, while noting concurrence where appropriate.</p>	N/A
--	-----

**PART III: REASONABLENESS OF REQUESTED COMPENSATION**  
**(completed by Intervenor except where indicated)**

**A. General Claim of Reasonableness (§ 1801 and § 1806):**

<p><b>a. Intervenor’s claim of cost reasonableness:</b></p> <p>The Clean Coalition devoted significant time and energy to develop the expertise relied upon in this proceeding, but we seek compensation only for the hours directly associated with our advocacy in this forum.</p> <p>As evidenced by the alignment between Clean Coalition recommendations and adopted determinations of the Commission, the Clean Coalition made a very substantial contribution to this proceeding.</p> <p>The impetus for our intervention and earlier efforts to bring attention to the need for Distribution Resource Planning is driven by the multi-billion dollar scale of annual investment in distribution infrastructure and the opportunity for Locational Net Benefits Analysis and DER Optimal Siting incentives to significantly improve the</p>	<p><b>CPUC Discussion</b></p> <hr/> <p>N/A</p>
--	--

<p>efficiency of this capital allocation and advance attainment of renewable portfolio standard (RPS) and greenhouse gas (GHG) reduction goals at the least cost and greatest customer benefit.</p> <p>A 1% savings in annual IOU distribution expenditures greatly exceeds all costs associated with this proceeding. The changes in SCE's demonstration project alone, as requested by the Clean Coalition and required by the Commission, will avoid unnecessary expenditures of over \$10 million.</p>	
<p><b>b. Reasonableness of hours claimed:</b></p> <p>We allocated staff time based on previously developed expertise to ensure efficient participation. Although we have invested heavily in developing expertise related to both technical and policy considerations in Distribution Resource Planning in multiple jurisdictions, only those staff hours spent specifically developing our policy positions and commenting in this proceeding are part of this compensation request.</p> <p>The hours devoted to this proceeding reflect work on written filings and related active participation in associated working groups and CPCU forums. Director of Economics and Policy Analysis Kenneth Sahm White drafted and reviewed comments and developed policy positions in coordination with Former Program Director Greg Thomson and Former Policy Directors Stephanie Wang and Brian Korpics.</p> <p>Former Program Director Greg Thomson is submitting a first time rate request of \$400, which is on the more senior end of the range for an expert. Mr. Thomson had worked in the energy issue for two years by the time he contributed to this proceeding in 2014 through his work at the Clean Coalition and Tam Industries. Prior to joining the Clean Coalition, he worked for over 17 years in the communications industry—a similarly heavily-regulated industry subject to CPUC jurisdiction. His resume is attached here.</p>	N/A
<p><b>c. Allocation of hours by issue:</b></p> <p>Issue 1: Guidance Ruling - 87.75 hours (17%)</p> <p>Issue 2: Utility Distribution Resource Plans, Roadmap &amp; Scoping - 157.75 hours (30%)</p> <p>Issue 3: Demos A &amp; B (Track 1) - 226.5 hours (43%)</p> <p>Issue 4: Demos C, D &amp; E (Track 2) - 51.5 hours (10%)</p>	N/A

**B. Specific Claim:\***

CLAIMED						CPUC AWARD [1]		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
Kenneth Sahm White	2014	63.5	\$290	D.16-04-032	\$18,415			\$0.00
Stephanie Wang	2014	14.5	\$360	D.14-12-075 and ALJ-329	\$5,220			\$0.00
Greg Thomson	2014	13.5	\$400	ALJ-329	\$5,400			\$0.00
Brian Korpics	2014	27.75	\$200	D.15-10-014	\$5,550			\$0.00
Kenneth Sahm White	2015	107.75	\$295	D.16-08-014	\$31,786.25			\$0.00
Brian Korpics	2015	7	\$200	D.16-01-032	\$1,400			\$0.00
Greg Thomson	2015	11.5	\$400	ALJ-329	\$4,600			\$0.00
Kenneth Sahm White	2016	196.25	\$300	D.16-08-014	\$58,875			\$0.00
Brian Korpics	2016	7.5	\$205	D.16-08-014	\$1,538			\$0.00
Katie Ramsey	2016	0	\$205	D.16-11-017	\$0			\$0.00
Kenneth Sahm White	2017	66.5	\$300	D.16-08-014	\$19,950			\$0.00
Brian Korpics	2017	7.75	\$205	D.16-08-014	\$1,589			\$0.00
Subtotal: \$ 154,322.50						Subtotal: \$ 0.00		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate	Basis for Rate*	Total\$	Hours	Rate	Total \$
Kenneth Sahm White	2017	16	\$150	½ Full Rate	\$2,400			\$0.00
Katie Ramsey	2017	6	\$102.5	½ Full Rate	\$615			\$0.00
Subtotal: \$ 3,015						Subtotal: \$0.00		
TOTAL REQUEST: \$ 157,337.50						TOTAL AWARD: \$0.00		
*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation.								

Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

**\*\*Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate**

#### ATTORNEY INFORMATION

Attorney	Date Admitted to CA BAR	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Stephanie Wang	September 29, 2008	257437	No
Brian Korpics	June 2, 2015	303480	No
Katherine Ramsey	February 11, 2015	302532	No

#### C. Attachments Documenting Specific Claim and Comments on Part III (attachments not attached to final Decision):

Attachment or Comment #	Description/Comment
1	Clean Coalition Time Records
2	Clean Coalition List of Issues and Filings
3	Greg Thomson Resume

#### D. CPUC Disallowances and Adjustments:

Item	Reason
[1]	The claim is denied based on Clean Coalition's ineligibility to claim intervenor compensation (see the Commission's comments in Part I(B), above).

#### PART IV: OPPOSITIONS AND COMMENTS

**Within 30 days after service of this Claim, Commission Staff or any other party may file a response to the Claim (see § 1804(c))**

<b>A. Opposition: Did any party oppose the Claim?</b>	No
<b>B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?</b>	No

If not:

Party	Comment	CPUC Discussion



**FINDING OF FACT**

1. Clean Coalition has not provided facts that would change the Commission's prior determination of Clean Coalition's ineligibility to claim intervenor compensation

**CONCLUSION OF LAW**

1. Clean Coalition is not eligible to claim intervenor compensation.

**ORDER**

1. The intervenor compensation claim filed by Clean Coalition is denied.

This decision is effective today.

Dated \_\_\_\_\_, at San Francisco, California.

**APPENDIX**

## Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D1702007		
Proceeding(s):	R1408013		
Author:	ALJ Robert Mason		
Payer(s):	N/A		

## Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Clean Coalition	04/17/17	\$157,337.50	\$0.00	N/A	Clean Coalition is not eligible to claim intervenor compensation

## Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Kenneth Sahm	White	Expert	\$290	2014	\$0.00
Kenneth Sahm	White	Expert	\$295	2015	\$0.00
Kenneth Sahm	White	Expert	\$300	2016	\$0.00
Kenneth Sahm	White	Expert	\$300	2017	\$0.00
Stephanie	Wang	Attorney	\$360	2014	\$0.00
Greg	Thomson	Expert	\$400	2014	\$0.00
Greg	Thomson	Expert	\$400	2015	\$0.00
Brian	Korpics	Expert	\$200	2014	\$0.00
Brian	Korpics	Expert/Attorney	\$200	2015	\$0.00
Brian	Korpics	Attorney	\$205	2016	\$0.00
Brian	Korpics	Attorney	\$205	2017	\$0.00
Katie	Ramsey	Attorney	\$205	2016	\$0.00

**(END OF APPENDIX)**