



FORM A: BLANK NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION

FILED

03/04/21

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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Investigate and Design Clean Energy Financing Options for Electricity and Natural Gas Customers.	R.20-08-022 (Filed August 27, 2020)
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**NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION
AND, IF REQUESTED (and [X]¹ checked), ADMINISTRATIVE LAW JUDGE'S
RULING ON [Renewables 100 Policy Institute]'S SHOWING OF SIGNIFICANT
FINANCIAL HARDSHIP**

NOTE: AFTER ELECTRONICALLY FILING A PDF COPY OF THIS NOTICE OF INTENT, PLEASE EMAIL THE DOCUMENT IN AN MS WORD FORMAT TO THE INTERVENOR COMPENSATION PROGRAM COORDINATOR AT

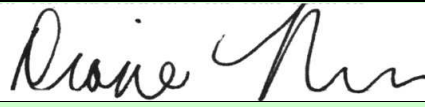
Icompcoordinator@cpuc.ca.gov.

Customer or Eligible Local Government Entity (party intending to claim intervenor compensation): Renewables 100 Policy Institute

Assigned Commissioner: Genevieve Shiroma

Administrative Law Judge: Carolyn Sisto

I hereby certify that the information I have set forth in Parts I, II, III and IV of this Notice of Intent is true to my best knowledge, information and belief.

Signature:	
Date: March 4, 2021	Printed Name: Diane Moss

PART I: PROCEDURAL ISSUES

(To be completed by the party intending to claim intervenor compensation)

A. Status as "customer" (see Pub. Util. Code § 1802(b))² The party claims "customer" status because the party is (check one):	Applies (check)
1. A Category 1 customer is an actual customer whose self-interest in the proceeding arises primarily from his/her role as a customer of the utility and,	<input type="checkbox"/>

¹ DO NOT CHECK THIS BOX if a finding of significant financial hardship is not 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).

² All statutory references are to California Public Utilities Code unless indicated otherwise.

<p>at the same time, the customer must represent the broader interests of at least some other customers. See, for example, D.08-07-019 at 5-10).</p>	
<p>2. A Category 2 customer is a representative who has been authorized by actual customers to represent them. Category 2 involves a more formal arrangement where a customer or a group of customers selects a more skilled person to represent the customer's views in a proceeding. A customer or group of customers may also form or authorize a group to represent them, and the group, in turn, may authorize a representative such as an attorney to represent the group.</p>	<input type="checkbox"/>
<p>3. A Category 3 customer is a formally organized group authorized, by its articles of incorporation or bylaws to represent the interests of residential customers or small commercial customers receiving bundled electric service from an electrical corporation (§1802(b)(1)(C)). Certain environmental groups that represent residential customers with concerns for the environment may also qualify as Category 3 customers, even if the above requirement is not specifically met in the articles or bylaws. See D.98-04-059, footnote at 30.</p>	<input checked="" type="checkbox"/>
<p>4. The party's detailed explanation of the selected customer category.</p> <p><u>The party's explanation of its status as a Category 1 customer.</u> A party seeking status as a Category 1 customer must describe the party's own interest in the proceeding and show how the customer's participation goes beyond just his/her own self-interest and will benefit other customers. Supporting documents must include a copy of the utility's bill.</p> <p><u>The party's explanation of its status as a Category 2 customer.</u> A party seeking status as a Category 2 customer must identify the residential customer(s) being represented and provide authorization from at least one customer.</p> <p><u>The party's explanation of its status as a Category 3 customer.</u> If the party represents residential and small commercial customers receiving bundled electric service from an electrical corporation, it must include in the Notice of Intent either the percentage of group members that are residential ratepayers or the percentage of the members who are receiving bundled electric service from an electrical corporation. Supporting documentation for this customer category must include current copies of the articles of incorporation or bylaws. If current copies of the articles and bylaws have already been filed with the Commission, only a specific reference (the proceeding's docket number and the date of filing) to such filings needs to be made.</p> <p>The Renewables 100 Policy Institute falls within the third category listed in Section 1802(b) because it qualifies as among the "environmental groups that represent residential customers with concerns for the environment," per D.98-04-</p>	

059, footnote at 30.

The Institute is a 501(c)(3) non-profit organization with a long-standing interest in studying and accelerating the transition from fossil and nuclear fuels to renewable sources in ways that are most environmentally sound, cost effective and just. The Renewables 100 Policy Institute is a formally organized group authorized pursuant to our Articles and Bylaws, a copy of which is attached. Advocating for underrepresented residents with an interest in the environment is aligned with our mission. As stated in Article 3, Section 3.2 of our Bylaws, we specifically seek to “identify and advocate for policies and regulations, including at government agencies, that inclusively benefit all of society, with particular attention to representing the interests of the underrepresented, such as people who are residential energy users, who are of low income, who are disproportionately impacted by toxics, pollution, and/or other threats to health and safety, who are from indigenous tribes, and/or who are underserved by reliable energy supplies.”

Renewables 100 Policy Institute previously has been a proceeding party at the California Public Utilities Commission in R.10-05-004 and R. 11-05-005, to which we submitted comments. We have furthermore convened numerous learning exchanges with CPUC Commissioners and staff, with a particular focus on advancing knowledge and best practices regarding how to create and implement cost-effective energy efficiency, renewable energy, and zero emissions transportation programs and policy frameworks. Relevant to R.20-08-022, this includes having led a bi-weekly working group on energy efficiency financing from 2011-2013, at the request of the Governor’s office, with staff from the Governor’s office, the CPUC, and the California Treasurer’s office, which helped establish a state Loan Loss Reserve program to support energy efficiency improvements. This working group evolved to then focus on zero emissions vehicles advancement, kicking off with a forum and report in 2013 that included CPUC Commissioners and staff.

<http://www.renewables100.org/en/programs/leadership-education/examples/pev-financing-workshop/>

The interests of the customers represented by the Renewables 100 Policy Institute are unique and are not adequately represented by other parties that have intervened in the proceeding. In D. 98-04-059 (footnote at 30), the Commission explained that “With respect to environmental groups, we have concluded they were eligible in the past with the understanding that they represent customers whose environmental interests include the concern that, e.g., regulatory policies encourage the adoption of all cost-effective conservation measures and discourage unnecessary new generating resources that are expensive and environmentally damaging (D.88- 04-066, mimeo, at 3). They represent customers who have a concern for the environment which distinguishes their interests from the interests represented by Commission staff, for example.” Consistent with this finding, the Renewables 100 Policy Institute represents customers with a concern for the

environment that distinguishes their interests from the interests represented by other consumer advocates who have intervened in this case.	
Do you have any direct economic interest in outcomes of the proceeding? ³ If “Yes”, explain:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B. Conflict of Interest (§ 1802.3)	Check
1. Is the customer a representative of a group representing the interests of small commercial customers who receive bundled electric service from an electrical corporation?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. If the answer to the above question is “Yes”, does the customer have a conflict arising from prior representation before the Commission?	<input type="checkbox"/> Yes <input type="checkbox"/> No
C. Status as an Eligible Local Government Entity (§§1802(d), 1802.4, 1803.1)	
The party claims “eligible local government entity” status because the party is a city, county, or city and county that is not a publicly owned public utility that intervenes or participates in a Commission proceeding for the purpose of protecting the health and safety of the residents within the entity’s jurisdiction following a catastrophic material loss suffered by its residents either in significant damage to infrastructure or loss of life and property, or both, as a direct result of public utility infrastructure.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
The party’s explanation of its status as an eligible local government entity must include a description of (1) The relevant triggering catastrophic event; (2) The impacts of the triggering catastrophic event on the residents within the entity’s jurisdiction as a result of public utility infrastructure; and (3) The entity’s reason(s) to participate in this proceeding.	
D. Timely Filing of Notice of Intent to Claim Intervenor Compensation (NOI) (§ 1804(a)(1)):	
1. Is the party’s NOI filed within 30 days after a Prehearing Conference? Date of Prehearing Conference: 2/5/2021	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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, Administrative Law Judge’s ruling, or other document authorizing the filing of NOI at that other time:	

³ See Rule 17.1(e).

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

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

The party's statement of the issues on which it plans to participate:

We plan to participate on issues outlined in the OIR and subsequent relevant documents, including the Scoping Memo. Such issues include designing energy efficiency financing in ways that are transparent, that do not necessarily rely on public funding, that protects consumers, and that consider opportunities to advance energy-related equity and public health, among other issues that may be raised.

The party's explanation of how it plans to avoid duplication of effort with other parties:

The Institute intends to coordinate its participation with other intervenors, particularly those with a focus on environmental concerns of residential ratepayers, to ensure that our efforts complement or supplement but do not duplicate that of others.

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

The Renewables 100 Policy Institute anticipates fully participating, including attending workshops and submitting comments and reply comments on issues raised in the OIR and Scoping Memo and other relevant documents and workshops in this proceeding, in order to maximize benefits to customers and the environment.

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)):

Item	Hours	Rate \$	Total \$	#
ATTORNEY, EXPERT, AND ADVOCATE FEES				
[Attorney 1]				
[Attorney 2]				
Diane Moss	50	\$263.72	\$13,186.00	
[Expert 2]				
[Advocate 1]				
[Advocate 2]				
<i>Subtotal: \$</i>				
OTHER FEES				
[Person 1]				
[Person 2]				

Subtotal: \$				
COSTS				
[Item 1]				
[Item 2]				
Subtotal: \$				
TOTAL ESTIMATE: \$				
Estimated Budget by Issues: The Renewables 100 Policy Institute anticipates allocating 100% of its budget to the issues mentioned in the OIR and that will presumably be refined in the upcoming Scoping Memo and other relevant documents that may be released.				
<i>When entering items, type over bracketed text; add additional rows to table as necessary. Estimate may (but does not need to) include estimated Claim preparation time. Claim preparation time is typically compensated at ½ professional hourly rate.</i>				

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

A. The party claims that participation or intervention in this proceeding without an award of fees or costs imposes a significant financial hardship, on the following basis:	Applies (check)
1. The 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(h))	<input checked="" type="checkbox"/>
2. In 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(h))	<input checked="" type="checkbox"/>
3. The eligible local government entities' participation or intervention without an award of fees or costs imposes a significant financial hardship. (§ 1803.1(b).)	<input type="checkbox"/>
4. A § 1802(h) or § 1803.1(b) finding of significant financial hardship in another proceeding, made within one year prior to the commencement of this proceeding, created a rebuttable presumption in this proceeding (§ 1804(b)(1)).	<input type="checkbox"/>
Commission's finding of significant financial hardship made in proceeding number:	
Date of Administrative Law Judge's Ruling (or CPUC Decision) in which the finding of significant financial hardship was made:	

B. The party's explanation of the factual basis for its claim of "significant financial hardship" (§ 1802(h) or § 1803.1(b)) (necessary documentation, if warranted, is attached to the NOI:

The Renewables 100 Policy Institute is a non-profit (501(c)(3)), policy-oriented environmental research and advocacy institution that brings an multi-disciplinary perspective to the understanding and analysis of complex public policy problems. The Institute is dependent on outside funding sources to perform its work. This proceeding will require intense and complex analysis and the type of background the Institute plans to bring to the process. As a small, public interest non-profit, the Institute cannot afford, without undue hardship, to pay for the costs of the effective participation of our team of experts in this proceeding without the assistance of the intervenor compensation program. While it is difficult to calculate exactly what the economic interests are of the residential ratepayers whom the Renewables 100 Policy Institute represents, it seems reasonable to assume that they are small in comparison to the the \$XX as estimated in Part II, Section B to be the cost of the organization's participation in this proceeding. By participating in this proceeding, the Renewables 100 Policy Institute wishes to further its objectives to promote the cost-effective, environmentally sound, just transition to 100% renewable energy sources, goals that go beyond an easily identified individual economic interest. These are goals that represent a broader public interest perspective, however, which is consistent with the Legislature's intent expressed in PUC Code 1801.3 (b) that the Commission administer the intervenor compensation program "in a manner 'that encourages the effective and efficient participation of all groups that have a stake in the public utility regulation process.'"

**PART IV: ATTACHMENTS DOCUMENTING SPECIFIC
ASSERTIONS MADE IN THIS NOTICE**

**(The party intending to claim intervenor compensation identifies and attaches documents;
add rows as necessary)**

Attachment No.	Description
1	Certificate of Service
2	Articles and Bylaws of the Renewables 100 Policy Institute

**ADMINISTRATIVE LAW JUDGE RULING⁴
(Administrative Law Judge completes)**

	Check all that apply
1. The Notice of Intent (NOI) is rejected for the following reasons:	<input type="checkbox"/>

⁴ A Ruling needs not be issued unless: (a) the NOI is deficient; (b) the Administrative Law Judge 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 or eligible local government entity's Intervenor Compensation Claim); or (c) the NOI has included a claim of "significant financial hardship" that requires a finding under § 1802(h).

a. The NOI has not demonstrated the party's status as a "customer" or an "eligible local government entity" for the following reason(s):	<input type="checkbox"/>
b. The NOI has not demonstrated that the NOI was timely filed (Part I(B)) for the following reason(s):	<input type="checkbox"/>
c. The NOI has not adequately described the scope of anticipated participation (Part II, above) for the following reason(s):	<input type="checkbox"/>
2. The NOI has demonstrated significant financial hardship for the reasons set forth in Part III of the NOI (above).	<input type="checkbox"/>
3. The NOI has not demonstrated significant financial hardship for the following reason(s):	<input type="checkbox"/>
4. The Administrative Law Judge provides the following additional guidance (see § 1804(b)(2)):	<input type="checkbox"/>

IT IS RULED that:

1. The Notice of Intent is rejected.	<input type="checkbox"/>
2. The customer or eligible local government entity has satisfied the eligibility requirements of Pub. Util. Code § 1804(a).	<input type="checkbox"/>
3. The customer or eligible local government entity has shown significant financial hardship.	<input type="checkbox"/>
4. The customer or eligible local government entity is preliminarily determined to be eligible for intervenor compensation in this proceeding. However, a finding of significant financial hardship in no way ensures compensation.	<input type="checkbox"/>
5. Additional guidance is provided to the customer or eligible local government entity as set forth above.	<input type="checkbox"/>

Dated _____, at San Francisco, California.

Administrative Law Judge