



Decision _____

FILED05/07/21
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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF
CALIFORNIA**

Application of San Diego Gas & Electric Company (U902E) for Authority to Eliminate the Seasonal Differential in its Residential Rates Per Decision 19-04-018.	A.19-09-014 (Filed September 23, 2019)
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**INTERVENOR COMPENSATION CLAIM OF UTILITY CONSUMERS'
ACTION NETWORK
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF UTILITY
CONSUMERS' ACTION NETWORK**

NOTE: After electronically filing a PDF copy of this Intervenor Compensation Claim (Request), please email the document in an MS WORD and supporting EXCEL spreadsheet to the Intervenor Compensation Program Coordinator at icompcordinator@cpuc.ca.gov.

Intervenor: UTILITY CONSUMERS' ACTION NETWORK	For contribution to Decision D. 21-01-018
Claimed: \$ 56,558.76	Awarded: \$
Assigned Commissioner: Genevieve Shiroma	Assigned ALJ: ALJ: Patrick Doherty
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
Signature:	William "Lee" Biddle
Date: May 7, 2021	Printed Name: William "Lee" Biddle

PART I: PROCEDURAL ISSUES
(to be completed by Intervenor except where indicated)

A. Brief description of Decision:	In the above-captioned proceeding, UCAN is requesting compensation for its contribution in Phase 2. The decision adopts an uncontested settlement to modify the seasonal price differentials in San Diego Gas & Electric Company's opt-in residential time-of-use rates. This decision also modified a contested settlement to eliminate the high usage
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	charge of the large electrical corporations once the corporations have completed the migration of their residential customers to time-of-use rates and met other criteria. UCAN presented evidence supporting its positions, and was involved in settlement discussions and negotiations that resulted in a settlement largely adopting positions advocated by UCAN.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812¹:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	November 6, 2019	
2. Other specified date for NOI:		
3. Date NOI filed:	December 6, 2020	
4. Was the NOI timely filed?		
Showing of eligible customer status (§ 1802(b) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	R.18-07-006	
6. Date of ALJ ruling:	May 30, 2019	
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	R.18-07-006	
10. Date of ALJ ruling:	May 30, 2019	
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		

¹ All statutory references are to California Public Utilities Code unless indicated otherwise.

13. Identify Final Decision:	D. 21-03-003	
14. Date of issuance of Final Order or Decision:	March 8, 2021	
15. File date of compensation request:	May 7, 2021	
16. Was the request for compensation timely?		

C. Additional Comments on Part I: (use line reference # as appropriate)

#	Intervenor's Comment(s)	CPUC Discussion

PART II: SUBSTANTIAL CONTRIBUTION
(to be completed by Intervenor except where indicated)

A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059): (For each contribution, support with specific reference to the record.)

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
UCAN joined this proceeding by filing a response to SDG&E's application because UCAN had ongoing concerns about bill volatility and confusing rates.	See Response of the Utility Consumers' Action Network on San Diego Gas & Electric Company's Application to Eliminate the Seasonal Differentiation in its Residential Rates per Decision 19-04-018, filed October 28, 2019.	
	See Decision 21-03-003 at p.2-3, noting UCAN's protest.	
While UCAN did not submit any filings in Phase 1, UCAN began its involvement in Phase 2 by providing comments on the proposed scope and schedule for Phase 2.	See Comments of the Utility Consumers' Action Network on Proposed Scope and Schedule of Phase Two, filed May 1, 2020.	

<p>ISSUES:</p> <p>1. Elimination of the High Usage Charge (HUC)</p> <p>In this proceeding, UCAN sought to eliminate the high usage charge imposed by the IOUs. UCAN was the only consumer group to seek elimination of the HUC.</p>	<p>UCAN presented evidence related to the impact of the HUC on consumers via testimony of Mary Neal of MRW & Associates, LLC. (Ex. UCAN-01, filed 8/21/20) Ms. Neal explained her support for eliminating the HUC as follows:</p> <ul style="list-style-type: none"> a. There was significant evidence the HUC was placing an undue burden on many customers just cooling homes during hot weather. (Testimony at p. 9) b. The HUC may be incurred for a variety of reasons, and in some cases may not be easily controlled by the customer such as those with inefficient older homes and appliances, or large surface area homes. (Testimony at p. 10) c. Climate change and increased summer cooling needs were pushing more customers into the HUC, as confirmed by SDG&E data, creating surprise bills and frustrated customers (Testimony at 10-11) d. Even with the transition to Time of Use (TOU) rates, SDG&E data showed a significant portion of ratepayers were still being assessed the HUC (Testimony at 11) e. Evidence that the HUC spurred conservation was lacking, and SDG&E's high standard rates were enough to incentivize conservation. (Testimony at 13) f. That potential rate increase from elimination of the HUC were reasonable in light of the benefits of eliminating the HUC and other 	
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<p>After lengthy negotiations among the parties, UCAN joined with all parties except one in a Settlement Agreement that advanced UCAN’s goal of eliminating the HUC, particularly in the SDG&E service area.</p> <p>In the Decision, the Commission adopted the settlement that permits rapid elimination of the HUC for SDG&E and in phased way for other IOU customers. (See D. 21-03-003 p. 17-18, including fn. 59 that SDG&E has already met one of the major criteria for HUC elimination as well as page 26, requiring elimination of the HUC when all criteria are met)</p>	<p>structural rate changes which were underway (Testimony at 12)</p> <p><i>See</i> Joint Motion For Adoption Of Joint Settlement Agreement Regarding Elimination Of The High Usage Charge. Filed October 23, 2020.</p> <p>The Decision noted UCAN’s opposition to the HUC. (D. 21-03-003 at p. 6) The decision reviewed UCAN’s testimony in support of eliminating the HUC, including the issues that 1) evidence showed customers were often being assessed the HUC simply to cool their homes (Id. at p. 8), 2) that customers may not be able to reduce usage (Id.) and 3) that SDG&E’s standard rates were also high enough to spur conservation (Id. at 9) Further, the decision noted UCAN was willing to accept other proposed rate increases to offset elimination of the HUC. (Id. at 16)</p> <p>The Decision discussed many of these same issues in finding that the Settlement should be adopted:</p> <p>The Decision found that because the settlement was supported by significant consumer interests, it supported a finding that finding that “the HUC settlement is in the public interest.” (D. 21-03-003 at p. 21)</p> <p>The Decision found that since evidence presented that the HUC was “not fulfilling its purpose to reduce the consumption of very high users” the public interest supported elimination of the HUC. (D. 21-03-003 at p. 23).</p>	
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	<p>The Decision noted it was in the public interest to adopt the HUC settlement despite the rate and bill impacts that would result. (D. 21-03-003 at p. 25)</p>	
<p>2. Modification of the Seasonal Price Differential</p> <p>A second issue in this proceeding was SDG&E's proposal to modify the seasonal differentials for tiered and untiered opt-in TOU rates.</p> <p>UCAN was largely supportive of SDG&E's proposal, although UCAN had concerns about the treatment of certain untiered rates in the proposal as well as the timing of SDG&E proposed implementation of the changes.</p> <p>After negotiations among the relevant parties, UCAN joined with all parties in Settlement Agreement in which SDG&E agreed to implement the modifications to the seasonal differential June 2021, as requested by the consumer parties.</p> <p>In the Decision, the Commission adopted the Settlement, finding it to be in the public interest. (D. 21-03-003 p. 28-33)</p>	<p>UCAN presented evidence related to SDGE's seasonal differential proposal via testimony of Mary Neal of MRW & Associates, LLC. (Ex. UCAN-01, filed 8/21/20)</p> <p>Ms. Neal noted her concerns about the treatment of certain untiered rates in SDG&E's proposal. (Testimony at 16-17). She also explained why SDG&E proposed changes should be delayed until the beginning of the summer billing period. (Testimony at 17-18).</p> <p><i>See</i> Joint Motion For Adoption Of Joint Settlement Agreement Regarding Elimination Of The High Usage Charge. Filed October 23, 2020.</p> <p>The Decision noted UCAN's general support of SDG&E's original proposal, as well as UCAN's concerns about the treatment of super off peak TOU rates and UCAN's testimony that the changes should be implement in the summer months. (D. 21-03-003 p. 33) The Decision noted that the Settlement</p>	

	should be adopted because “it commanded broad support among participants fairly reflective of the affected interests[.]” (Id. at 28), and that it was appropriate to implement it on “timeframes recommended by TURN, CforAT, and UCAN.” (Id. at 32)	
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor’s Assertion	CPUC Discussion
a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?²	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	No	
c. If so, provide name of other parties:		
d. Intervenor’s claim of non-duplication: While other consumer advocates, including Cal Advocates, TURN and Center for Accessible Technology were also part of the proceeding, UCAN was the only consumer advocate providing testimony in favor of elimination of the high usage charge rather than modifying it. Other consumer focused parties sought to modify the charge instead. UCAN also focused on SDG&E’s seasonal differential charge. Because this issue was unique to SDG&E, UCAN was one of the few parties to address the issue in detail in testimony.		

C. Additional Comments on Part II: (use line reference # or letter as appropriate)

#	Intervenor’s Comment	CPUC Discussion

² The Office of Ratepayer Advocates was renamed the Public Advocate’s Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

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

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

	CPUC Discussion
<p>a. Intervenor’s claim of cost reasonableness:</p> <p>UCAN is requesting reimbursement of \$56,558.76. This includes time for UCAN’s attorneys, expert witness and paralegal. UCAN urges the Commission to find these costs reasonable in light of its substantial contribution to the record detailed in Part II (A) above. Because UCAN stood in a unique position as the only consumer advocate supporting full elimination of the HUC, UCAN found it necessary and appropriate to provide expert testimony advocating for this position. Further, while the case did ultimately settle, the efforts to resolve this matter involved extensive settlement discussions amongst parties with widely divergent interests, a complex settlement structure that required significant analysis, and a hearing on the reasonableness of that settlement involving both UCAN’s expert witness and counsel.</p> <p>Ultimately, the ability to settle the case on terms negotiated by almost all parties saved significant resources at the Commission by ensuring that a full hearing was not necessary.</p> <p>UCAN also sought to reduce expenses when it believed its participation in a particular portion of the proceeding would be duplicative or unnecessary, such as; 1) UCAN did not file reply testimony, given that each of the IOUs would be expected to adequately and thoroughly respond to the testimony of other consumer parties who sought to maintain the HUC in some form and; 2) Given that all parties except one were supportive of the settlement, UCAN provided only limited comments addressing the proposed decision largely accepting that settlement; 3) UCAN expert Ms. Neal utilize the services of a lower cost associate within her firm to assist in the review of utility testimony and computations related to proposed rate changes.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>In this proceeding, UCAN is claiming 62.10 total hours of attorney/advocate time, 89 hours of time from UCAN’s expert witness and .5 hours of legal support time. UCAN is requesting reimbursement of 57.75 hours for Mr. Biddle, 11 for Ms. Krikorian and .5 hours for Ms. Cook-Sloan for her support work. UCAN is also requesting reimbursement of 57.75 hours for expert witness Mary Neal and 31.25 hours for expert witness Michelle Mann. The amounts listed here are for hours spent examining the issues (reviewing orders, utility proposals, and preparing opening and reply brief) as well as review and editing of most filings, participating in settlement negotiations and at a hearing on the</p>	

<p>reasonableness of that settlement. The above hours exclude time claimed for NOI and intervenor compensation request preparation.</p> <p>The amount of this request is above that in UCAN’s Notice of Intent because of factors including the following: at the time of writing the NOI, parties were in settlement discussions which seemed probable and therefore UCAN estimated hours based on that outcome. However, not only did parties not initially settle, the proceeding went on to have multiple proposed decisions and a Phase 2 that included hearings. UCAN did not anticipate the full scope and complexity of the Phase 2 portion of this proceeding and therefore underestimated the necessary hours it would take to make a substantial contribution. However, overall UCAN feels its hours were reasonable based on the complexity of the issues, its substantial contribution documented above and the importance of the outcome to SDG&E ratepayers.</p> <p>Further, as a result of Resolution ALJ-393, UCAN is seeking 2021 hourly rates that are higher than were anticipated at the time of the NOI.</p>																															
<p>c. Allocation of hours by issue:</p> <table><tr><th>Total Hours</th><th>% of Hours per Issue</th><th>Issue</th></tr><tr><td>3.50</td><td>2%</td><td>1. General Prep (GP)</td></tr><tr><td>8.25</td><td>5%</td><td>2. Hearings, Workshops, and Conferences (HWC)</td></tr><tr><td>22.55</td><td>15%</td><td>3. Filings (F)</td></tr><tr><td>21.20</td><td>14%</td><td>4. Discovery (D)</td></tr><tr><td>59.45</td><td>39%</td><td>5. Testimony (T)</td></tr><tr><td>2.30</td><td>2%</td><td>6. Coordination (C)</td></tr><tr><td>0.00</td><td>0%</td><td>7. Evidentiary Hearings (EH)</td></tr><tr><td>35.35</td><td>23%</td><td>8. Settlement (S)</td></tr><tr><td>152.60</td><td>100%</td><td></td></tr></table>	Total Hours	% of Hours per Issue	Issue	3.50	2%	1. General Prep (GP)	8.25	5%	2. Hearings, Workshops, and Conferences (HWC)	22.55	15%	3. Filings (F)	21.20	14%	4. Discovery (D)	59.45	39%	5. Testimony (T)	2.30	2%	6. Coordination (C)	0.00	0%	7. Evidentiary Hearings (EH)	35.35	23%	8. Settlement (S)	152.60	100%		
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B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hour s	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
William “Lee” Biddle	2020	48.3	\$492.24	See Comment 1	\$23,775.19			
William “Lee” Biddle	2021	3.8	\$600	See Comment 1	\$2,280.00			

Jane Krikorian	2019	11	\$215	D.20-02-020	\$2,365.00						
Courtney Cook-Sloan	2019	.5	\$170	D.20-02-020	\$85.00						
Mary Neal	2020	57.75	\$315	See Comment 4	\$18,191.25						
Michelle Mann	2020	31.25	\$225	See Comment 5	\$7,031.25						
Subtotal: \$53,727.69						Subtotal: \$					
OTHER FEES											
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):											
Item	Year	Hour s	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$			
Subtotal: \$						Subtotal: \$					
INTERVENOR COMPENSATION CLAIM PREPARATION **											
Item	Year	Hour s	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$			
William "Lee" Biddle	2021	7	\$300	See Comment 1	\$2,100						
Jane Krikorian	2019	1	\$107.50	D.20-02-020	\$107.50						
Jane Krikorian	2021	2	\$254.74	See Comment 2	\$509.48						
Courtney Cook-Sloan	2021	1	\$92.83	See Comment 3	\$92.83						
Subtotal: \$2,831.07						Subtotal: \$					
COSTS											
#	Item	Detail			Amount	Amount					
1.											

2.				
Subtotal: \$				Subtotal: \$
TOTAL REQUEST: \$56,558.76				TOTAL AWARD: \$
<p>*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.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate</p>				
ATTORNEY INFORMATION				
Attorney	Date Admitted to CA BAR³	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation	
William "Lee" Biddle	2001	217128	no	

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

Attachment or Comment #	Description/Comment
1	Certificate of Service
Comment 1	<p><u>Biddle 2020 Rate</u></p> <p>UCAN is requesting a COLA increase for William "Lee" Biddle hours in 2020. Mr. Biddle has nearly 20 years of experience. Mr. Biddle's rate for 2018 is \$470 determined in D.19-08-033. In a previous ICOMP, UCAN requested a rate increase for Mr. Biddle hours in 2019 for the rate of \$480 based off Resolution ALJ-357 ruling of a 2.35% COLA. For hours worked in 2020 UCAN is requesting for a rate increase to \$492.24 based off Resolution ALJ-387 2.55% COLA increase.</p> <p><u>Biddle 2021 Rate</u></p>

³ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch> .

	<p>UCAN requests a new rate for Mr. William “Lee” Biddle hours in 2021 based on Resolution ALJ-393 Adopting Intervenor Compensation Market Rate Study and Addressing Related Matters issued December 22, 2020. The Resolution directs intervenors to use the Hourly Rate Chart spreadsheet available on the Commissions ICOMP webpage to determine the appropriate hourly rate when completing claims for work performed on or after January 1, 2021. Consequently, Mr. Biddle needs to establish an appropriate rate for work performed after January 1, 2021. According to the labor roles and rates established by this resolution and found in the hourly rate chart, Mr. Biddle’s responsibilities are consistent with the title of a Level V Attorney with 15+ years’ experience as an admitted member of the California Bar.</p> <p>Mr. Biddle completed his undergraduate studies at Princeton University and then received his law degree from California Western School of Law in 2001. Much of his nearly 20 year legal career has been spent on issues directly before or related to the Public Utilities Commission.</p> <p>Immediately upon being admitted to the California Bar in 2001, Mr. Biddle began working at UCAN as a ratepayer advocate on issues in the telecommunications and energy industries. Mr. Biddle was directly involved in actions against telecommunications and internet companies, including I. 02-06-003, where Mr. Biddle examined witnesses, and presented evidence and legal arguments at a lengthy hearing before the Commission, ultimately resulting in a \$12 million penalty and over \$18 million in refunds to customers of a major wireless carrier. Mr. Biddle’s work on this and other matters included developing legal strategies, filing complaints with the Commission, legal briefing, advocacy at multiple hearings and even defending Commission decisions on appeal.</p> <p>After his first stint at UCAN, Mr. Biddle joined the Ferris & Britton law firm, where his work included representation of a major cable television and telecommunications provider in matters before the CPUC for several years. Mr. Biddle spent over a decade with Ferris & Britton, engaged in general litigation as well as administrative proceedings for several clients. Mr. Biddle’s work included complex, multi-year litigation arising from three separate California wildfires, including advising on Commission proceedings relating to the fires.</p> <p>Mr. Biddle also served as a member of the City of San Diego’s Ethics Commission from 2005 to 2013, after being appointed to the Commission by a vote of the City Council. The Commission enforces the City’s lobbying, campaign finance and conflict of interest rules. In this capacity, Mr. Biddle served as an administrative law judge on several occasions, conducting hearings and drafting decisions in proceedings seeking to enforce City rules against individuals.</p>
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	<p>Mr. Biddle rejoined UCAN in 2019. Since his return he has built on his prior experience to advocate for ratepayers on telecommunication and energy issues.</p> <p>Due to Mr. Biddle’s education, experience and current responsibilities, UCAN is requesting a 2021 rate of \$600 which is just below Resolution ALJ-393’s median level of \$606.31 for an attorney with 15+ years’ experience. Given that Mr. Biddle has nearly 20 years of experience, much of it involving successful advocacy before the Commission, UCAN feels this rate is reasonable.</p>
Comment 2	<p>UCAN requests a new rate for Ms. Jane Krikorian based on Resolution ALJ-393 Adopting Intervenor Compensation Market Rate Study and Addressing Related Matters issued December 22, 2020. The Resolution directs intervenors to use the Hourly Rate Chart spreadsheet available on the Commissions ICOMP webpage to determine the appropriate hourly rate when completing claims for work performed on or after January 1, 2021. Consequently, Ms. Krikorian needs to establish an appropriate rate for work performed after January 1, 2021.</p> <p>According to the labor roles and rates established by this resolution and found in the hourly rate chart, Ms. Krikorian’s responsibilities are consistent with the title of a Level II Legal Director with 2-5 years’ experience and an education level of Juris Doctorate.</p> <p>Ms. Krikorian graduated law school in 2010 and has 12 years of legal experience. For the past seven years she has been working at UCAN steadily increasing her responsibilities and practice experience before the Commission. This includes increased involvement in UCAN’s proceedings including filing protests, utilizing discovery, directing the work of expert consultants and witnesses, submitting testimony, cross examining witnesses in hearings, writing briefs and submitting comments on Commission issues and proposed decisions. Ms. Krikorian’s last approved rate was for 2020 as an expert at \$265/hr (D.21-04-012; see Part III, Section D, Item 3).</p> <p>For the past three years, Ms. Krikorian’s increased responsibilities included directing UCAN’s advocacy efforts before the Commission on behalf of utility ratepayers. This resulted in increased involvement with overseeing the overall legal work of the organization including providing strategic direction on which proceedings the organization should choose to best protect the interests of San Diego gas and electric ratepayers. Ms. Krikorian meets weekly with legal staff to coordinate case assignments and discuss legal issues and actions before the Commission. Her responsibilities include sourcing outside experts to assist UCAN in analyzing complex issues before the Commission. Ms. Krikorian meets regularly with the Executive Director to discuss budget issues and track revenue and expenses regarding staff hours and payments to experts. She also participated in the hiring decisions of two part-time attorneys for UCAN, and is responsible for coordinating case assignments for them.</p> <p>Ms. Krikorian’s background includes extensive legal research experience including two years (2008-2010) as a law clerk/research assistant for</p>

	<p>constitutional law professor Michael R. Belknap while in law school at California Western School of Law. In January 2020 through March 2020, Ms. Krikorian increased her knowledge and skills by participating in a 12-week Fundamentals of Utility Law webinar course taught by Professor Scott Hempling, adjunct professor at Georgetown University Law Center and author of “Regulating Public Utility Performance: The Law of Market Structure, Pricing and Jurisdiction” (American Bar Association 2013). Due to Ms. Krikorian’s education, experience and current responsibilities, UCAN is requesting a rate of \$509.49 which is in between the median-to-high level for a Legal Director Level II with 2-5 years’ experience and an education level of Juris Doctorate.</p>
Comment 3	<p>UCAN requests a new rate for Ms. Courtney Cook-Sloan based on Resolution ALJ-393 Adopting Intervenor Compensation Market Rate Study and Addressing Related Matters issued December 22, 2020. The Resolution directs intervenors to use the Hourly Rate Chart spreadsheet available on the Commissions ICOMP webpage to determine the appropriate hourly rate when completing claims for work performed on or after January 1, 2021. Consequently, Ms. Cook-Sloan needs to establish an appropriate rate for work performed after January 1, 2021. According to the labor roles and rates established by this resolution and found in the hourly rate chart, Ms. Cook-Sloan’s responsibilities are consistent with the title of a Level II Paralegal Manager with 2-5 years of experience and an education level that includes an Associate’s Degree plus four years of experience that equates to an educational equivalency of a Bachelor’s Degree. Her additional three years of work experience are being used to establish her actual rate according to the market rate range found in the Lookup page of the Excel workbook.</p> <p>Ms. Cook-Sloan graduated Paralegal School in 2015 with an Associate’s Degree and has five years of legal experience. For the past five years she has been working at UCAN steadily increasing her responsibilities and practice experience before the Commission. This includes increased involvement in UCAN’s proceedings including validating and overseeing preparation of legal documents, providing research and coordination on complex projects with UCAN’s attorneys. Ms. Cook-Sloan is also responsible for UCAN’s financial and reporting documents including assisting with budgeting and tracking revenue and expenses. Ms. Cook-Sloan’s last approved rate for 2019 was as an expert at \$170/hr. (D.20-07-031; see Part III, Section D, Item 3).</p> <p>Ms. Cook-Sloan’s background includes working in an office environment for 10 years including an internship at Elder Law and Advocacy and working for Springbrook Insurance. Skills learned at both jobs translated to Ms. Cook-Sloan’s current position at UCAN. Her previous responsibilities were maintaining documents, working with managerial staff, filling out forms and drafting documents. Her skills have further developed at UCAN. She is responsible for researching utility law and reporting results to legal staff. She</p>

	<p>assists UCAN's Legal Director and Executive Director with managing a CPUC calendar with deadlines and due dates. She is responsible for tracking all staff's billable hours and travel receipts. She assists the Executive Director with consumer and member outreach. She maintains UCAN's financial records and assists the Executive Director in preparing reports for the Board of Director's. Due to Ms. Cook-Sloan's education, experience and current responsibilities, UCAN is requesting a rate of \$185.67 which is just above the median range for a Paralegal Manager Level II with 2-5 years' experience and an educational equivalency of a Bachelor's Degree.</p>
Comment 4	<p>UCAN expert Mary Neal established a rate of \$275 in D.20-07-031(see Part III, Section D, Item 5) as a Sr. Project Manager with 10 years of experience in energy consulting. This rate was based on the 7-12 years of experience tier for an expert in 2018 (see Resolution ALJ-352). Since 2018, Ms. Neal has submitted over a dozen written testimonies in both Wisconsin and California with over half of the testimonies filed at the California Public Utilities Commission (CPUC). Ms. Neal's testimony and expertise helped raise and resolve important issues in each of the proceedings where she filed testimony on behalf of Utility Consumers' Action Network. For example, in the General Rate Case Phase 2 (A.19-03-002) Ms. Neal's analysis helped propose the System Average Percentage Change (SAPC) method for rate change issues between GRCs; for SDG&E's Power Your Drive Extension (A.19-10-012) application Ms. Neal's testimony and analysis showed how SDG&E failed to justify cost assumptions and the proposed program size and budget; and in the present proceeding, Seasonal Differentiation and High User Charge (A.19-09-014), Ms. Neal brought a consumer-focused prospective to why the HUC should be eliminated and proposed changes to SDG&E seasonal rate differential proposal that were made part of the settlement. In addition to her extensive experience, Ms. Neal holds a Master's Degree in Energy and Environmental Analysis from Boston University and a Bachelor's Degree in Mechanical Engineering from the University of California, Davis. Based on Ms. Neal's established rate and her additional contributions and experience at the CPUC, UCAN is asking for the following rate adjustments: \$315 rate for 2020 based on \$275 rate adjusted to reflect Res. ALJ – 357 (2.35% COLA for 2019) and Res. ALJ – 387 (2.55% COLA for 2020) plus 5% step up increase and reflecting top tier range of Res. ALJ – 387 Expert Rate Chart for Experts with 7-12 years' experience. UCAN believes with Ms. Neal's experience and education a rate of \$315 is justified.</p>
Comment 5	<p>UCAN requests that the Commission approve the rate of \$225 an hour for Michelle Mann. Ms. Mann is an Associate with MRW & Associates, LLC, with close to six years of experience in energy consulting. Most recently, she has been involved in proceedings at the California Public Utilities Commission (CPUC) by helping Senior Associates at MRW draft data requests and testimony including: analyzing new CCA fees in the SCE GRC Phase I (A.19-08-013); read and summarize testimony from all parties to help draft rebuttal testimony in the SDG&E GRC Phase II (A.19-03-002); analyze history of SDG&E Power Your Drive program including analysis of EV utilization to help draft data</p>

	requests and testimony (A.19-10-012); analyze history of the High User Charge (HUC) and seasonal differentiated prices and the impact of suggested rate changes to help draft testimony (A.19-09-014). Additionally, Ms. Mann has work experience at the Los Angeles Department of Water and Power as a Mechanical Engineering Associate where she planned upgrades to LADWP's gas turbines' catalysts to comply with the Southern California Air Quality Management District's new limits on air emissions and created the daily plan for the hourly operation of LADWP's generation to minimize costs (see attached resume for additional accomplishments). In addition to her work experience, Ms. Mann has a Master's Degree in Green Technologies from the University of Southern California and a Bachelor's Degree in Mechanical Engineering from Carnegie Mellon University. The requested rate of \$225 is based on the 0-6 years of experience tier for an expert in 2020 reflected in Res. ALJ-387. UCAN believes based on Ms. Mann's experience, education, and contributions to important issues at the CPUC, \$225 is a fair and reasonable rate.
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D. CPUC Comments, Disallowances, and Adjustments (CPUC completes)

Item	Reason

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))

A. Opposition: Did any party oppose the Claim?	
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If so:

Party	Reason for Opposition	CPUC Discussion

B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?	
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If not:

Party	Comment	CPUC Discussion

(Green items to be completed by Intervenor)

FINDINGS OF FACT

1. **UTILITY CONSUMERS' ACTION NETWORK** [has/has not] made a substantial contribution to D.21-03-003.
2. The requested hourly rates for **UTILITY CONSUMERS' ACTION NETWORK**'s representatives [, as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [, as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$_____.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. **UTILITY CONSUMERS' ACTION NETWORK** shall be awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay **UTILITY CONSUMERS' ACTION NETWORK** the total award. [for multiple utilities: "Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay **UTILITY CONSUMERS' ACTION NETWORK** their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated. If such data is unavailable, the most recent [industry type, for example, electric] revenue data shall be used."] Payment of the award shall include

compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75th day after the filing of **UTILITY CONSUMERS' ACTION NETWORK**'s request, and continuing until full payment is made.

3. The comment period for today's decision [is/is not] waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D.21-03-003		
Proceeding(s):	A.19-09-014		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
UTILITY CONSUMERS' ACTION NETWORK	May 7, 2021	\$56,558.76		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
William "Lee"	Biddle	Attorney	\$492.24	2020	
William "Lee"	Biddle	Attorney	\$600	2021	
Jane	Krikorian	Advocate	\$215	2019	
Jane	Krikorian	Legal Manager	\$509.49	2021	
Courtney	Cook-Sloan	Paralegal	\$170	2019	
Courtney	Cook-Sloan	Paralegal Manager	\$185.67	2021	
Mary	Neal	Expert	\$315	2020	
Michelle	Mann	Expert	\$225	2020	

(END OF APPENDIX)

A.19-09-014-UTILITY CONSUMERS' ACTION NETWORK'S TIMESHEET

UCAN's Attorney William "Lee" Biddle

Date	Case #	Hours	Issue	Notes
5/1/2020	A.19-09-014	0.40	F	conference with Jane on status of case and issues for phase 2
5/1/2020	A.19-09-014	2.50	F	drafting of comments on phase 2 schedule issues, including review of prior actions in proceeding related to phase two issues.
5/1/2020	A.19-09-014	0.10	GP	review of ALJ e-mail ruling
5/5/2020	A.19-09-014	0.50	GP	review of SDGE phase one compliance filing
5/15/2020	A.19-09-014	0.30	GP	review of scoping memo on phase two issues.
7/2/2020	A.19-09-014	1.50	GP	review SDG&E Testimony
7/6/2020	A.19-09-014	0.20	D	review Data request proposed by expert witness
7/7/2020	A.19-09-014	0.30	S	e-mails with SDGE regarding settlement call
7/10/2020	A.19-09-014	0.30	C	discussion with expert witness on Cal-PA proposal
7/10/2020	A.19-09-014	0.40	S	review settlement proposal of Cal-PA
7/13/2020	A.19-09-014	1.00	S	prepare for then call with SDGE and consumer parties on settlement.
7/17/2020	A.19-09-014	0.30	S	review of SDGE term sheet on settlement proposal
7/17/2020	A.19-09-014	0.50	S	review follow up correspondence among parties on settlement proposals
7/23/2020	A.19-09-014	0.30	S	review further discussions among parties on settlement issues.
8/17/2020	A.19-09-014	1.50	T	review proposed UCAN testimony and provide comments to expert on same.
8/18/2020	A.19-09-014	0.50	T	call with expert witness on opening testimony
8/19/2020	A.19-09-014	0.20	T	correspondence with expert about testimony
8/20/2020	A.19-09-014	0.50	T	review of all documents related to filing and send same to UCAN staff for pre-filing organization
8/21/2020	A.19-09-014	0.70	T	final review of testimony for filing.
9/14/2020	A.19-09-014	0.30	T	review summary of opening testimony issues created by UCAN expert witness
9/14/2020	A.19-09-014	0.20	S	correspondence with PGE on setting settlement conference
9/15/2020	A.19-09-014	1.50	T	review of opening testimony of all parties
9/15/2020	A.19-09-014	0.50	T	call with expert witness on potential reply testimony
9/15/2020	A.19-09-014	1.00	S	conference call with all parties on settlement issues
9/21/2020	A.19-09-014	0.50	T	review and complete cross exam estimate document, including discussion with UCAN expert on same.
9/21/2020	A.19-09-014	1.00	T	review of rebuttal testimony of all parties.
9/22/2020	A.19-09-014	0.20	S	correspondence with PGE and UCAN expert on settlement settlement call.
9/22/2020	A.19-09-014	0.30	S	correspondence with UCAN expert and SDGE on seasonality issue in proceeding.
9/22/2020	A.19-09-014	0.30	S	review of settlement offer from TURN and related parties
9/24/2020	A.19-09-014	0.20	S	correspondence with SDGE and PGE on settlement issues
9/24/2020	A.19-09-014	0.50	T	review and correct witness/exhibit list and correspondence with SCE counsel on same.
9/28/2020	A.19-09-014	0.50	S	review of PGE settlement proposal and respond to PGE attorney on same
9/29/2020	A.19-09-014	0.20	S	correspondence with SDGE on potential settlement call
9/29/2020	A.19-09-014	0.20	GP	review e-mail from ALJ on procedural issues
9/29/2020	A.19-09-014	0.80	HWC	status conference call with ALJ
9/29/2020	A.19-09-014	1.20	S	all party settlement call.
9/29/2020	A.19-09-014	0.50	S	call on settlement issues with PG&E counsel
9/30/2020	A.19-09-014	0.80	S	settlement call with SDGE, including discussion before and after call with UCAN expert witness
9/30/2020	A.19-09-014	0.30	S	review TURN settlement proposal
10/1/2020	A.19-09-014	0.70	S	prepare for then have call with TURN about settlement proposal
10/2/2020	A.19-09-014	1.00	S	prepare for then have settlement call with all parties.
10/6/2020	A.19-09-014	0.40	S	review proposed settlement from IOUs
10/6/2020	A.19-09-014	1.00	S	settlement call with all parties.

10/7/2020	A.19-09-014	0.20	S	review/approve e-mail to judge on settlement status.
10/19/2020	A.19-09-014	1.00	S	review settlement terms and documents, including multiple party e-mails on same
10/20/2020	A.19-09-014	0.20	S	review and send e-mails on approval of settlement
10/21/2020	A.19-09-014	0.20	S	review changes to settlement papers and e-mails of parties on same.
10/30/2020	A.19-09-014	0.10	GP	review ALJ procedural e-mail
11/9/2020	A.19-09-014	0.10	GP	review procedural e-mail from ALJ on upcoming hearings.
11/10/2020	A.19-09-014	0.20	GP	coordinate upcoming call with other settling parties
11/13/2020	A.19-09-014	1.00	C	prepare for and participate in call with all settling parties on hearing issues
11/13/2020	A.19-09-014	2.00	S	settlement hearing prep work- review of potential issues, documents that may be needed for hearing, coordinate prep meeting with UCAN expert
11/17/2020	A.19-09-014	0.30	S	Review of group notes from prior settlement prep meeting, share with expert
11/17/2020	A.19-09-014	1.50	S	call with a settling party and witnesses for settlement preparation
11/18/2020	A.19-09-014	0.20	F	review of settling party correspondence on briefing and related issues
11/18/2020	A.19-09-014	0.20	HWC	review final exhibit list and witness estimates provided by parties
11/20/2020	A.19-09-014	6.50	HWC	participate in settlement panel hearings
12/7/2020	A.19-09-014	0.10	F	email with expert witness about briefing issues, case status
12/10/2020	A.19-09-014	1.00	F	review opening briefs on settlement issues.
12/11/2020	A.19-09-014	0.20	F	e-mails between settling parties on issues with opening briefs.
12/11/2020	A.19-09-014	0.30	S	review multiple additional e-mail between settling parties on issues with briefs on settlement.
12/12/2020	A.19-09-014	1.00	F	further review of opening briefs and potential issues for reply.
12/14/2020	A.19-09-014	0.20	F	review multiple e-mails between settling parties on reply brief issues
12/15/2020	A.19-09-014	3.00	F	drafting of reply brief of UCAN on settlement issues.
12/17/2020	A.19-09-014	0.50	F	review draft reply brief of PGE and comments on other settling parties on the reply brief
12/18/2020	A.19-09-014	0.70	F	finalize reply comments on HUC settlement
12/21/2020	A.19-09-014	1.50	F	review reply comments of other parties on HUC settlement
1/28/2021	A.19-09-014	1.00	S	review decision from ALJ on settlement agreement
1/30/2021	A.19-09-014	0.30	S	e-mail with multiple other settling parties on ALJ decision
2/2/2021	A.19-09-014	1.00	F	call with other settling parties on responding to proposed decision
2/10/2021	A.19-09-014	1.00	F	review and provide comments on proposed joint statement of settling parties
2/11/2021	A.19-09-014	0.50	F	review comments of multiple settling parties on joint statement/settlement issues

Issues Total: **52.10**

Travel

Total Travel Time: **0.00**

Intervener Compensation

5/6/2021 A.19-09-014 7.00 ICOMP Drafting ICOMP

Total Int. Comp.: **7.00**

2020

Total Hours	% of Hours per Issue	Issue
48.30	100.00%	1. Issues (inclusive)
0.00	0.00%	2. Travel Time
0.00	0.00%	3. NOI and Intervenor Compensation Claim

Total 2020: **48.30** **100.00%**

2021

Total Hours	% of Hours per Issue	Issue
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	3.80	35.19%	1. Issues (inclusive)
	0.00	0.00%	2. Travel Time
	7.00	64.81%	3. NOI and Intervenor Compensation Claim
Total 2021:	10.80	100.00%	

Cumulative Totals

	Total Hours	% of Hours per Issue	Issue
	3.00	6%	1. General Prep (GP)
	7.50	14%	2. Hearings, Workshops, and Conferences (HWC)
	13.80	26%	3. Filings (F)
	0.20	0%	4. Discovery (D)
	7.70	15%	5. Testimony (T)
	1.30	2%	6. Coordination (C)
	0.00	0%	7. Evidentiary Hearings (EH)
	18.60	36%	8. Settlement (S)
Total Issues:	52.10	100%	

Total Travel Time: 0.00

Total Int. Compensation: 7.00

Total Hours: 59.10

UCAN's Regulatory Program Manager Jane Krikorian

Date	Case #	Hours	Issue	Notes
10/23/2019	A.19-09-014	2.00	F	Reading the Application and Testimony
10/24/2019	A.19-09-014	1.00	F	Writing a Response to the Application
10/25/2019	A.19-09-014	3.00	F	Writing a Response to the Application
10/28/2019	A.19-09-014	2.00	F	Finalizing Response to the Application
11/1/2019	A.19-09-014	1.00	C	Conference call with TURN, CalPA, CforAT to discuss issues and schedule
11/11/2019	A.19-09-014	0.25	F	Reviewing SDG&E's Rely to Responses and Protest
11/18/2019	A.19-09-014	0.50	GP	Emailing Brandon Charles @ MRW to discuss becoming an expert
12/3/2019	A.19-09-014	0.75	S	Email to intervenors asking them to settle
12/3/2019	A.19-09-014	0.50	S	Reviewing TURN and CalPA response and sending back a response
Issues Total:		11.00		

Travel

Total Travel Time: 0.00

Intervener Compensation

12/5/2019	A.19-09-014	1.00	NOI	Drafting NOI
4/20/2021	A.19-09-014	0.50	ICOMP	Discussing w/ Courtney re: ICOMP planning
4/21/2021	A.19-09-014	0.25	ICOMP	Emailing MRW re: information for their rates for the ICOMP request
4/21/2021	A.19-09-014	0.25	ICOMP	Emailing Lee re: ICOMP plan and schedule
4/22/2021	A.19-09-014	0.25	ICOMP	Phone call with MRW re: ICOMP and their rates
4/22/2021	A.19-09-014	0.75	ICOMP	Writing ICOMP
Total Int. Comp.:		3.00		

2019

Total Hours	% of Hours per Issue	Issues
11.00	91.67%	1. Issues (inclusive)
0.00	0.00%	2. Travel Time
1.00	8.33%	3. NOI and Intervenor Compensation Claim
12.00	100.00%	

Total 2019:**2020**

Total Hours	% of Hours per Issue	Issue
0.00	0.00%	1. Issues (inclusive)
0.00	0.00%	2. Travel Time
0.00	0.00%	3. NOI and Intervenor Compensation Claim
0.00	0.00%	

Total 2020:**2021**

Total Hours	% of Hours per Issue	Issue
0.00	0.00%	1. Issues (inclusive)
0.00	0.00%	2. Travel Time
2.00	100.00%	3. NOI and Intervenor Compensation Claim
2.00	100.00%	

Total 2021:**Cumulative Totals**

Total Hours	% of Hours per Issue	Issue
0.50	5%	1. General Prep (GP)
0.00	0%	2. Hearings, Workshops, and Conferences (HWC)
8.25	75%	3. Filings (F)
0.00	0%	4. Discovery (D)
0.00	0%	5. Testimony (T)
1.00	9%	6. Coordination (C)
0.00	0%	7. Evidentiary Hearings (EH)
1.25	11%	8. Settlement (S)
11.00	100%	

Total Issues:**Total Travel Time: 0.00****Total Int. Compensation: 3.00****Total Hours: 14.00****UCAN's Expert Michelle Mann**

Date	Case #	Hours	Issue	Notes
7/1/2020	A.19-09-014	1.00	D	Review MAM work on summary of proceeding
7/1/2020	A.19-09-014	0.50	D	Call with MAM re: Follow-up analysis and edits to draft discovery
7/9/2020	A.19-09-014	0.50	T	Call with MAM re: Analysis of marginal cost and next steps
7/16/2020	A.19-09-014	0.50	T	Review marginal cost calculations from MAM
7/16/2020	A.19-09-014	0.25	T	Call with MAM re: Analytical progress on rate comparison and follow up tasks
7/23/2020	A.19-09-014	0.25	T	Meet with MAM re: Modeling progress and next steps

8/6/2020	A.19-09-014	0.75	T	Call with MAM re: Draft direct testimony
8/6/2020	A.19-09-014	4.50	T	Write draft direct testimony
8/10/2020	A.19-09-014	0.50	T	Research past comments on high usage charge
8/14/2020	A.19-09-014	2.25	T	Write draft direct testimony
8/16/2020	A.19-09-014	2.00	T	Write draft direct testimony
8/18/2020	A.19-09-014	0.50	T	Call with L. Biddle and MAM re: Edits to draft direct testimony
8/19/2020	A.19-09-014	2.50	T	Edit direct testimony
9/14/2020	A.19-09-014	1.00	T	Read direct testimony by other parties to assess need for rebuttal
9/15/2020	A.19-09-014	0.50	T	Call with L. Biddle, MAM re: Need for rebuttal testimony
9/16/2020	A.19-09-014	1.00	S	Initial informal settlement discussion with all parties
9/18/2020	A.19-09-014	0.50	T	Read rebuttal testimony
9/22/2020	A.19-09-014	0.50	S	Call with L. Biddle, MAM re: HUC settlement discussions
9/22/2020	A.19-09-014	1.00	S	All party settlement discussion, including MAM
9/29/2020	A.19-09-014	0.75	HWC	Pre-hearing conference
9/29/2020	A.19-09-014	1.00	S	All party settlement conference, with MAM
9/30/2020	A.19-09-014	0.25	S	Call with L. Biddle and SDG&E re: Settlement of seasonal differential issues
9/30/2020	A.19-09-014	0.50	S	Call with L. Biddle re: Ongoing settlement discussions
10/2/2020	A.19-09-014	1.00	S	All party settlement conference
10/6/2020	A.19-09-014	1.00	S	All party settlement call
10/7/2020	A.19-09-014	0.50	S	Review and approve settlement terms for seasonal differentiation issues
11/17/2020	A.19-09-014	1.75	S	Call with L. Biddle et al re: Setting parties conference for hearing preparation
11/20/2020	A.19-09-014	4.00	S	Hearing settlement panel
Total Issues:		31.25		

Travel

Total Travel Time: 0.00

Intervener Compensation

Total Int. Comp.: 0.00

2020

	Total Hours	% of Hours per Issue	Issue
	31.25	100.00%	1. Issues (inclusive)
	0.00	0.00%	2. Travel Time
	0.00	0.00%	3. NOI and Intervenor Compensation Claim
Total 2020:	31.25	100.00%	

Cumulative Totals

Total Hours	% of Hours per Issue	Issue
0.00	0%	1. General Prep (GP)
0.75	2%	2. Hearings, Workshops, and Conferences (HWC)
0.00	0%	3. Filings (F)
1.50	5%	4. Discovery (D)
16.50	53%	5. Testimony (T)
0.00	0%	6. Coordination (C)

	0.00	0%	7. Evidentiary Hearings (EH)
	12.50	40%	8. Settlement (S)
Total Issues:	31.25	100%	

Total Travel Time: 0.00

Total Int. Compensation: 0.00

Total Hours: 31.25

UCAN's Expert Mary Neal

Date	Case #	Hours	Issue	Notes
7/1/2020	A.19-09-014	0.50	D	Call with MNN re: Draft discovery edits and follow-up
7/1/2020	A.19-09-014	7.00	D	Write data request and proceeding summary
7/2/2020	A.19-09-014	8.00	D	Write data request and proceeding summary
7/6/2020	A.19-09-014	2.00	D	Gather data on current marginal generation costs to compare overall SDG&E gen rates to marginal costs
7/8/2020	A.19-09-014	2.00	D	Gather data on current marginal generation costs to compare overall SDG&E gen rates to marginal costs
7/9/2020	A.19-09-014	0.50	T	Call with MNN Re: A. 19-09-014 analysis
7/9/2020	A.19-09-014	1.00	T	Compare SDG&E rates with LMP by season and TOU
7/10/2020	A.19-09-014	2.00	T	Compare SDG&E rates with LMP by season and TOU
7/13/2020	A.19-09-014	3.00	T	Develop model to compare rates to LMP
7/15/2020	A.19-09-014	3.00	T	Complete model to compare rates to LMP
7/16/2020	A.19-09-014	0.25	T	Call with MNN re: Retail rate to LMP comparison
7/20/2020	A.19-09-014	2.00	T	Update comparison of residential rates to LMPs
7/23/2020	A.19-09-014	0.25	T	Call with MNN Re: Modeling progress and next steps
7/23/2020	A.19-09-014	2.00	T	Complete update of comparison of residential rates to LMPs
7/27/2020	A.19-09-014	1.00	T	Draft Testimony
8/6/2020	A.19-09-014	0.75	T	Call with MNN re: Direct testimony
8/7/2020	A.19-09-014	7.50	T	Write testimony
8/10/2020	A.19-09-014	2.50	T	Continue writing direct testimony
8/18/2020	A.19-09-014	3.00	T	Write direct testimony
8/18/2020	A.19-09-014	0.50	T	Call with L. Biddle, MNN re: Check in meeting on testimony status
8/20/2020	A.19-09-014	2.00	T	Edit direct testimony
9/11/2020	A.19-09-014	3.50	T	Create an opinion matrix of different parties direct testimony to assess need for rebuttal
9/15/2020	A.19-09-014	0.50	T	Call with L. Biddle, MNN re: HUC rebuttal testimony
9/22/2020	A.19-09-014	1.00	S	Call with J. Oliveira, G. Slocum, L. Biddle, representatives from IOUs, TURN, Cal advocates, and CforT and MNN re: Formal settlement meeting
9/22/2020	A.19-09-014	0.50	S	Call with L. Biddle, MNN re: UCAN's settlement stance
9/29/2020	A.19-09-014	1.00	S	All-party settlement discussion, with MNN
10/7/2020	A.19-09-014	0.50	S	Read and confirm terms of settlement
Total Issues:		57.75		

Travel

Total Travel Time: 0.00

Intervener Compensation

Total Int. Comp.: 0.00

2020

	Total Hours	% of Hours per Issue	Issue
	57.75	100.00%	1. Issues (inclusive)
	0.00	0.00%	2. Travel Time
	0.00	0.00%	3. NOI and Intervenor Compensation Claim
Total 2020:	57.75	100.00%	

Cumulative Totals

	Total Hours	% of Hours per Issue	Issue
	0.00	0%	1. General Prep (GP)
	0.00	0%	2. Hearings, Workshops, and Conferences (HWC)
	0.00	0%	3. Filings (F)
	19.50	34%	4. Discovery (D)
	35.25	61%	5. Testimony (T)
	0.00	0%	6. Coordination (C)
	0.00	0%	7. Evidentiary Hearings (EH)
	3.00	5%	8. Settlement (S)
Total Issues:	57.75	100%	

Total Travel Time: 0.00

Total Int. Compensation: 0.00

Total Hours : 57.75

UCAN's Paralegal Courtney Cook-Sloan

Date	Case #	Hours	Issue	Notes
10/24/2019	A.19-09-014	0.50	F	Creating a rate chart for Jane to include in Response
Total Issues				

Travel

Total Travel

Intervener Compensation

12/5/2019	A.19-09-014	0.25	NOI	Drafting NOI
5/7/2021	A.19-09-014	1.00	ICOMP	Finalizing ICOMP
Total Int. Comp.:		1.25		

2019

	Total Hours	% of Hours per Issue	Issue
	0.50	0.00%	1. Issues (inclusive)
	0.00	0.00%	2. Travel Time
	0.25	0.00%	3. NOI and Intervenor Compensation Claim
Total 2019:	0.75	0.00%	

2021

Total Hours	% of Hours per Issue	Issue
0.00	0.00%	1. Issues (inclusive)

	0.00	0.00%	2. Travel Time
	1.00	0.00%	3. NOI and Intervenor Compensation Claim
Total 2021:	1.00	0.00%	

Cumulative Totals

	Total Hours	% of Hours per Issue	Issue
	0.00	0%	1. General Prep (GP)
	0.00	0%	2. Hearings, Workshops, and Conferences (HWC)
	0.50	100%	3. Filings (F)
	0.00	0%	4. Discovery (D)
	0.00	0%	5. Testimony (T)
	0.00	0%	6. Coordination (C)
	0.00	0%	7. Evidentiary Hearings (EH)
	0.00	0%	8. Settlement (S)
Total Issues:	0.50	0%	
Total Travel Time:	0.00		
Total Int. Compensation:	1.25		
Total Hours :	1.75		

UCAN'S Cumulative Hours

2019

	Total Hours	% of Hours per Issue	Issue
	11.50	90.20%	1. Issues (inclusive)
	0.00	0.00%	2. Travel Time
	1.25	9.80%	3. NOI and Intervenor Compensation Claim
Total 2019:	12.75	100.00%	

2020

	Total Hours	% of Hours per Issue	Issue
	137.30	100.00%	1. Issues (inclusive)
	0.00	0.00%	2. Travel Time
	0.00	0.00%	3. NOI and Intervenor Compensation Claim
Total 2020:	137.30	100.00%	

2021

	Total Hours	% of Hours per Issue	Issue
	3.80	27.54%	1. Issues (inclusive)
	0.00	0.00%	2. Travel Time
	10.00	72.46%	3. NOI and Intervenor Compensation Claim
Total 2020:	13.80	100.00%	

Cumulative Totals

	Total Hours	% of Hours per Issue	Issue
	3.50	2%	1. General Prep (GP)
	8.25	5%	2. Hearings, Workshops, and Conferences (HWC)
	22.55	15%	3. Filings (F)
	21.20	14%	4. Discovery (D)
	59.45	39%	5. Testimony (T)
	2.30	2%	6. Coordination (C)
	0.00	0%	7. Evidentiary Hearings (EH)
	35.35	23%	8. Settlement (S)
Total Issues:	152.60	100%	
Total Travel Time:	0.00		
Total Int. Compensation:	11.25		
Total Hours:	163.85		

MARY NEAL

PROFESSIONAL EXPERIENCE

Senior Project Manager MRW & Associates, LLC (2018)

Conduct technical analysis of electric and gas utility rate cases and other regulatory filings and serve as expert witness in regulatory proceedings. Perform integrated resource planning on behalf of Community Choice Aggregators and Electric Service Providers in California. Construct and critique models for utility cost allocation, rate design, retail rate forecasts, and benefits of distributed generation facilities. Evaluate energy procurement options and provide analytical and strategic support for business decisions and litigation on electric and gas issues.

Senior Consultant Daymark Energy Advisors, Inc. (2009-2017)

Advised electric and gas industry clients on resource planning, utility rates, and market design issues. Testified before multiple state and Canadian provincial regulatory agencies on issues related to electric market modeling, fuel cost forecasting, cost allocation, rate design, and electric utility capital planning. Prepared and critiqued numerous electric and gas utility allocated cost of service, revenue requirement and rate design models. Led modeling team for Daymark Energy Advisors' AURORAxmp Northeast electric market model.

Engineer Solar Turbines, Inc. (2005-2008)

Designed dry low-emission combustion systems for Mars SoLoNOx gas turbines. Led development of fuel injectors for landfill gas and aftermarket retrofit applications.

EDUCATION

M.A., Energy and Environmental Analysis, Boston University, 2010
B.S. Mechanical Engineering, University of California, Davis, 2005

Prepared Testimony

1. Nova Scotia Utility and Review Board Matter No. 04600
Direct Testimony of Mary Neal on Behalf of the Nova Scotia Small Business Advocate Concerning Nova Scotia Power's 2012 Annual Capital Expenditure Plan. January 13, 2012.
2. Public Service Commission of Wisconsin Docket No. 3270-UR-118
Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board of Wisconsin Concerning Madison Gas & Electric's Application for Authority to Change Electric and Natural Gas Rates. August 27, 2012.
3. Public Service Commission of Wisconsin Docket No. 6690-UR-123
Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board of Wisconsin Concerning Wisconsin Public Service Corporation's Application to Adjust Electric and Natural Gas Rates. August 13, 2014.
4. Nova Scotia Utility and Review Board Matter No. 06514
Direct Testimony of Mary Neal on Behalf of the Nova Scotia Small Business Advocate Concerning Nova Scotia Power's 2015 Annual Capital Expenditure Plan. January 16, 2015.
5. Public Service Commission of Wisconsin Docket No. 05-CE-145/05-CE-147
Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board of Wisconsin Concerning the Joint Application of Wisconsin Electric Power Company, Madison Gas and Electric Company, and WPPI Energy for a Certificate of Authority to Upgrade Various Power Block Equipment at Elm Road Generating Station Units to Facilitate the Use of Sub-Bituminous or Powder River Basin Coals as a Fuel Source/Construct a Site Bulk Material Handling Project at Oak Creek and Elm Road Generating Station. February 24, 2015.
6. Public Service Commission of Wisconsin Docket No. 6690-UR-124
Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board of Wisconsin Concerning Wisconsin Public Service Corporation's Application to Adjust Electric and Natural Gas Rates. September 2, 2015.
7. Nova Scotia Utility and Review Board Matter No. 07176
Direct Testimony of Mary Neal on Behalf of the Nova Scotia Small Business Advocate Concerning Nova Scotia Power's 2016 Annual Capital Expenditure Plan. February 17, 2016.
8. New York Public Service Commission Case No. 16-E-0060
Direct Testimony of the Electric Rate Panel on Behalf of the New York Utility Intervention Unit Concerning the Rates, Charges, Rules and Regulations of Consolidated

Edison Company of New York, Inc. for Electric Service (with Lee Smith and Danielle Panko). May 27, 2016.

9. Vermont Public Service Board
Testimony of Mary Neal on Behalf of Swanton Village Electric Concerning Swanton Village Electric's Proposed Electric Vehicle Charging Station Pilot Program (with assistance from Vermont Public Power Supply Authority). June 2016.
10. CPUC Application 18-07-024
Testimony on Behalf of The City of Long Beach, Energy Resources Department. April 12, 2019.
11. Public Service Commission of Wisconsin Docket No. 5-CE-146
Direct Testimony of Mary Neal on Behalf of Citizens Utility Board. April 26, 2019.
12. Public Service Commission of Wisconsin Docket No. 5-CE-146
Supplemental Direct Testimony of Mary Neal on Behalf of Citizens Utility Board. May 3, 2019.
13. Public Service Commission of Wisconsin Docket No. 5-CE-146
Rebuttal Testimony of Mary Neal on Behalf of Citizens Utility Board. May 28, 2019.
14. Public Service Commission of Wisconsin Docket No. 5-CE-146
Surrebuttal Testimony of Mary Neal on Behalf of Citizens Utility Board. May 28, 2019.
15. Public Service Commission of Wisconsin Docket No. 6690-UR-126
Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board, Clean Wisconsin & Wisconsin Industrial Energy Group. August 23, 2019.
16. Public Service Commission of Wisconsin Docket No. 6690-UR-126
Supplemental Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board, Clean Wisconsin & Wisconsin Industrial Energy Group. August 28, 2019.
17. Public Service Commission of Wisconsin Docket No. 6690-UR-126
Surrebuttal Testimony of Mary Neal on Behalf of the Citizens Utility Board, Clean Wisconsin & Wisconsin Industrial Energy Group. October 4, 2019.
18. CPUC Application 19-03-002
Direct Testimony of Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design. April 6, 2020.
19. CPUC Application 19-03-002
Rebuttal Testimony of Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design. May 4, 2020.

20. CPUC Application 19-10-012
Testimony of Substitute Witness Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application to Extend and Modify the Power Your Drive Pilot Approved by Decision 16-01-045. May 18, 2020.
21. CPUC Application 19-10-012
Rebuttal Testimony of Substitute Witness Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application to Extend and Modify the Power Your Drive Pilot Approved by Decision 16-01-045. June 19, 2020.
22. CPUC Application 19-09-014
Direct Testimony of Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Phase 2 Opening Testimony. August 21, 2020.
23. CPUC Application 19-11-019
Direct Testimony of Mary Neal on Behalf of the Western Manufactured Housing Communities Association in Pacific Gas & Electric's 2020 Electric Cost Allocation and Rate Design Proceeding. November 20, 2020.

MICHELLE MANN

PROFESSIONAL EXPERIENCE

Associate

MRW & Associates, LLC

(February 2020 – present)

Perform technical and written analysis of electric utility rate cases, transportation electrification, net metering tariffs, San Diego's Power Your Drive pilot extension program, and other regulatory proceedings. Model energy profiles and retail electricity rate scenarios for Community Choice Aggregators and other clients.

Mechanical Engineering Associate

Los Angeles Department of Water and Power

(July 2017 – January 2020)

Planned upgrades to LADWP's gas turbines' catalysts to comply with the Southern California Air Quality Management District's new limits on air emissions. Automated the process to update the regulatory forms for the California Energy Commission. Drafted recommendations for the repair of needle valves and mechanical governor systems at a hydroelectric power plant. Produced engineering instructions for repairs at a natural gas generating station. Created the daily plan for the hourly operation of LADWP's generation to minimize costs. Modeled the effects of renewable energy generation volatility and changes in the daily operational plan for the entire LADWP system.

Water Conservation Assistant

City of Pleasanton

(June 2016 – January 2017)

Wrote proposals that received state approval to convert buildings' irrigation systems to recycled water. Modified ArcGIS maps with information from building blueprints to show the layout for recycled water installation. Designed a web application that organized all the customer data and improved data entry speed

Intern

Viridis Fuels

(June 2014 – August 2014)

Conducted market research on the feedstock prices in Chile, Argentina and the United States to help select a cost-effective supplier.

EDUCATION

M.S., Green Technologies, University of Southern California, 2017

B.S., Mechanical Engineering, Carnegie Mellon University, 2016