



Decision \_\_\_\_\_

**FILED**

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

01/20/23

04:59 PM

R1812006

Order Instituting Rulemaking to Continue the Development of Rates and Infrastructure for Vehicle Electrification.	Rulemaking 18-12-006 (Filed December 13, 2018)
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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 [lcompcoordinator@cpuc.ca.gov](mailto:lcompcoordinator@cpuc.ca.gov).

<b>Intervenor: UTILITY CONSUMERS' ACTION NETWORK</b>	<b>For contribution to Decision D.22-11-040</b>
<b>Claimed: \$50,242.50</b>	<b>Awarded: \$</b>
<b>Assigned Commissioner: Clifford Rechtschaffen</b>	<b>Assigned ALJ: John Larsen, Sasha Goldberg</b>
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).	
<b>Signature:</b>	<b>/s/ Jane Krikorian</b>
<b>Date: 1/20/2023</b>	<b>Printed Name: Jane Krikorian</b>

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

<b>A. Brief description of Decision:</b>	<b><u>D.22-11-040 (November 21, 2022):</u></b> This decision adopted a long-term electrification policy framework that included a third-party administered statewide transportation electrification infrastructure rebate program to be funded by the Investor-Owned Utilities (IOUs). The adopted program prioritizes investment in low-income, underserved, and tribal communities to ensure participation
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	<p>from customers that lack access to the benefits of transportation electrification. While the proceeding remains open, this decision resolves the transportation electrification framework (TEF) policy and program design topics that have been under consideration since 2020. UCAN has participated in this proceeding since its inception and is requesting compensation for substantial contributions made in this decision, described in Part II (A) below.</p>
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812<sup>1</sup>:**

	<b>Intervenor</b>	<b>CPUC Verification</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	March 1, 2019	
2. Other specified date for NOI:		
3. Date NOI filed:	March 27, 2019	
4. Was the NOI timely filed?		
<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.18-07-006	
6. Date of ALJ ruling:	May 30, 2019 See Comment 1	
7. Based on another CPUC determination (specify):	D.19-11-014, D.19-09-020, D.19-10-049	
8. Has the Intervenor demonstrated customer status or eligible government entity status?		
<b>Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):</b>		
9. Based on ALJ ruling issued in proceeding number:	R.18-07-006	
10. Date of ALJ ruling:	May 30, 2019	

<sup>1</sup> All statutory references are to California Public Utilities Code unless indicated otherwise.

	See Comment 1	
11. Based on another CPUC determination (specify):	D.19-11-014, D.19-09-020, D.19-10-049	
12. Has the Intervenor demonstrated significant financial hardship?		
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.22-11-040	
14. Date of issuance of Final Order or Decision:	November 21, 2022	
15. File date of compensation request:	January 20, 2023	
16. Was the request for compensation timely?		

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

#	Intervenor’s Comment(s)	CPUC Discussion
Comment 1	<p>UCAN was last found to satisfy the § 1802(g) “significant financial hardship” requirement in R.18-07-006 (filed Nov. 8, 2018; granted May 30, 2019). This was five and one-half months after the TEF application was filed on December 13, 2018. A prior finding of significant financial hardship was made in A.17-01-012 on April 24, 2017.</p> <p>UCAN has also requested a significant financial hardship ruling in its NOI’s filed in R.18-12-005 on March 20, 2019, in R.20-01-007 on April 13, 2020, in A.20-04-014 on July 17, 2020, in A.20-07-016 on October 14, 2020, and in R.21-03-011 on May 26, 2021. UCAN received a ruling on December 14, 2020 in R.20-07-013 and on May 27, 2022 in A.21-12-006.</p>	

**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.)**

<b>Intervenor’s Claimed Contribution(s)</b>	<b>Specific References to Intervenor’s Claimed Contribution(s)</b>	<b>CPUC Discussion</b>
<p><b>Summary</b></p> <p>UCAN has participated in the TEF proceeding since it began on December 13, 2018 and has previously submitted two claims for substantial contributions in four decisions.</p> <p>The current final decision, D.22-11-040, “<i>resolves the transportation electrification framework policy and program design topics that have been under consideration since 2020 and adopts the most important elements of the statewide infrastructure rebate program.</i>” Therefore, any UCAN hours not claimed in the aforementioned intervenor compensation claims will be included here.</p> <p>UCAN represents and protects the interests of ratepayers in the San Diego Gas &amp; Electric territory. From the beginning of this proceeding, UCAN’s examination of the issues focused on how to measure the cost-effectiveness of TE investments, how to compare these investments to the potential for a more open marketplace, and the overall effect of TE project costs to</p>	<p><b>UCAN’s intervenor compensation claim filed September 20, 2021 for D.20-12-029 and D.21-07-028; and another claim filed September 30, 2022 for D.22-08-024 and D.21-12-033. Both of these claims are still pending.</b></p> <p><b>D.22-11-040 at 2.</b></p>	

<p>utility payers, and how to strengthen ratepayer protections.</p>		
<p><b>Issues:</b></p> <p><b>1. <u>Electric Vehicle Rate Evolution Plans (EVREV)</u></b></p> <p>The Draft TEF recommended requiring each IOU’s Transportation Electrification Plan (TEP) to contain an EVREV plan, which would include collaborative, stakeholder guided strategy for improving the customer experience in paying for EV fueling and potentially providing compensation to customers for discharging their EV batteries at times of grid congestion.</p> <p>UCAN supported the idea of a collaborative process and considered it essential.</p> <p>The final decision noted UCAN’s recommendation.</p> <p>The Commission agreed that a collaborative process between the IOUs and stakeholders was worthwhile and directed the creation of a forum on vehicle-grid integration.</p>	<p><b>D.22-11-040 at 42.</b></p> <p><i>“UCAN believes that collaboration between the IOUs, ESPs and CCAs on rate design strategies to effect grid integration is essential to achieving these goals.”</i></p> <p><b>UCAN Opening Comments on Sections 9, 10 and 12 of the Energy Division Staff Proposal for a Transportation Electrification Framework, filed September 11, 2020 at 9-10.</b></p> <p><b>D.22-11-040 at 45, fn. 138 and please note UCAN reference at 43, fn. 134</b></p> <p><b>D.22-11-040 at 45.</b></p>	

<p><b><u>2. TE Programs Cost Recovery &amp; Allocation</u></b></p> <p>The draft TEF requested comment on whether the IOUs should recover TE program costs through the distribution rate component of the customer's bill.</p> <p>UCAN disagreed with recovering TE program costs through distribution rates and instead recommended an allocation of the costs on an equal cents per kilowatt-hour (kWh) basis through the Public Purpose Program (PPP) surcharge because the TE program serves a broader societal interest and its costs are direct subsidies by ratepayers who do not use the charging infrastructure to those who do.</p> <p>The final decision noted UCAN's recommendation.</p> <p>SCE argued the Commission's allocation of TE program costs must recognize the various categories of costs contained within a single TE program to equitably allocate these costs. PG&amp;E and CLECA both supported the recommendation to recover costs through distribution rates.</p> <p>In the final decision, the Commission directed the IOUs to record all BTM TE program costs in either one-way subaccounts within the IOUs' individual TE Balancing Accounts or through separate one-way balancing accounts and recover them through</p>	<p><b>UCAN Opening Comments on Sections 9, 10 and 12 of the Energy Division Staff Proposal for a Transportation Electrification Framework, filed September 11, 2020 at 12.</b></p> <p><b>D.22-11-040 at 48, fn. 147.</b></p> <p><b>D.22-11-040 at 49.</b></p>	
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<p>distribution rates. The Commission reasoned this method was consistent with past TE program decisions.</p> <p>While the final decision did not adopt UCAN’s recommendation, UCAN believes its comments helped develop the record and thoroughly examine this issue.</p>	<p><b>D.22-11-040 at 50.</b></p>	
<p><b>3. <u>Annual Roundtable</u></b></p> <p>The Staff Proposal recommended the IOUs and Program Administrator host annual roundtables to review the program’s efficacy in addressing equity, with participation from stakeholders, including CBOs, environmental justice organizations, tribal communities, Commission representatives, CCAs, the Disadvantaged Communities Advisory Group, and other stakeholders.</p> <p>UCAN supported annual roundtables to review the program’s effectiveness in addressing equity issues and reaching out to CBOs that could help inform the program administrator and process. UCAN’s recommendation was noted in the final decision.</p> <p>The Commission adopted a single annual roundtable as opposed to separate data-and-equity focused roundtables.</p>	<p><b>D.22-11-040 at 50.</b></p> <p><b>UCAN Reply Comments on Energy Division Staff Proposal to Establish Transportation Electrification Funding Cycles and Statewide Behind-the-Meter Program issued February 25, 2022, filed May 16, 2022 at 6.</b></p> <p><b>D.22-11-040 at 83, fn. 268.</b></p> <p><b>D.22-11-040 at 83.</b></p> <p><b>Conclusion of Law #22</b></p>	
<p><b>4. <u>Total FC1 Budget</u></b></p>		

<p>The Staff Proposal proposed a total budget of \$1 billion over five years.</p> <p>UCAN argued the Commission should wait to authorize such a large level of ratepayer funding until a full review of the TE program’s costs and benefits.</p> <p>Other parties also found the budget excessive while other parties found the proposed level of funding insufficient.</p> <p>The Commission adopted the proposed \$1 billion budget for FC1 finding this level of funding appropriately balanced the benefits of increased access to TE and the costs of continued ratepayer investment.</p> <p>While not adopting UCAN’s recommendation, UCAN believes its comments helped develop the record and examine this issue.</p>	<p><b>D.22-11-040 at 86.</b></p> <p><b>UCAN Comments on Energy Division Staff Proposal to Establish Transportation Electrification Funding Cycles and Statewide Behind-the-Meter Program issued February 25, 2022, filed April 25, 2022 at 5-7.</b></p> <p><b>D.22-11-040 at 87-89.</b></p> <p><b>D.22-11-040 at 89.</b></p>	
<p><b><u>5. Ownership of BTM Equipment</u></b></p> <p>The Staff Proposal noted the varying degrees of IOU infrastructure ownership for BTM equipment.</p> <p>UCAN reiterated its argument that utility ownership of EVSE stifles competition, is not a cost-effective approach to attain California’s goals and that third-party investment and a rebate structure is a more cost-effective option for ratepayers.</p>	<p><b>D.22-11-040 at 100.</b></p> <p><b>UCAN Reply Comments on Energy Division Staff Proposal to Establish Transportation Electrification Funding Cycles and Statewide Behind-the-Meter Program issued February 25, 2022, filed May 16, 2022 at 3.</b></p>	



<p>UCAN’s concerns were noted in the final decision.</p> <p>Parties offered a variety of recommendations on ownership models.</p> <p>The Commission found it appropriate to eliminate all IOU ownership of BTM infrastructure beginning with FC1 reasoning that such a shift in the ownership paradigm allows for technology and construction flexibility while reducing the cost burden that capitalized IOU expenditure impose on ratepayers.</p>	<p><b>D.22-11-040 at 101.</b></p> <p><b>D.22-11-040 at 101 - 103.</b></p> <p><b>D.22-11-040 at 103.</b></p> <p><b>Conclusion of Law #24 and #42</b></p>	
<p><b>6. <u>Targets</u></b></p> <p>UCAN argued that <i>“meaningful targets, metrics and load data must be a priority for the TEF. Without these established indicators there is no way of know whether programs are incentivizing TE progress or meeting GHG reduction goals...this is an important piece missing in the Staff Proposal.”</i></p> <p>UCAN’s arguments were noted in the final decision.</p> <p>Other parties stressed the importance of targets and metrics.</p> <p>The Commission agreed that “program targets can improve program implementation and performance. Therefore, we establish a target development process and provide a list of</p>	<p><b>UCAN Reply Comments on Energy Division Staff Proposal to Establish Transportation Electrification Funding Cycles and Statewide Behind-the-Meter Program issued February 25, 2022, filed May 16, 2022 at 3.</b></p> <p><b>D.22-11-040 at 187 .</b></p> <p><b>D.22-11-040 at 186 - 187.</b></p> <p><b>D.22-11-040 at 187.</b></p>	

<p>minimum target categories for FC1.”</p>		
<p><b>7. <u>Data Assessment</u></b></p> <p>UCAN “<i>strongly supported the recommendation that the IOUs submit to ED staff a complete audit of all TE-related data the IOUs are currently reporting.</i>”</p> <p>UCAN also emphasized the need for TE load forecasting and data collection because this data was, “<i>most relevant to IOU’s system needs, costs and ratemaking...in other words, this data is most relevant to that which will most affect the pocketbooks of ratepayers.</i>”</p> <p>UCAN’s recommendations were noted in the final decision.</p> <p>The Commission adopted the Staff Proposal’s [data assessment] structure “because it is a reasonable methodology to inventory all IOU TE data and ensure funds are properly spent.”</p> <p>While not adopting all of UCAN’s recommendations, UCAN was cited on many of the major issues, some of which the Commission agreed with and adopted. UCAN believes its work and input helped inform and enhance the record and aided the Commission in reaching its decisions on many of these issues in this proceeding.</p>	<p><b>UCAN Comments on Energy Division Staff Proposal to Establish Transportation Electrification Funding Cycles and Statewide Behind-the-Meter Program issued February 25, 2022, filed April 25, 2022 at 8.</b></p> <p><b>D.22-11-040 at 193, fn. 573.</b></p> <p><b>D.22-11-040 at 194.</b></p>	

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

	<b>Intervenor’s Assertion</b>	<b>CPUC Discussion</b>
<b>a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?<sup>2</sup></b>	Yes	
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	Yes	
<b>c. If so, provide name of other parties:</b>		
<p>On the issue of cost recovery, UCAN, Cal Advocates and SBUA expressed similar positions.</p> <p>On BTM IOU ownership of equipment, UCAN, Cal Advocates and TURN expressed similar positions.</p>		
<b>d. Intervenor’s claim of non-duplication:</b>		
<p>The Commission opened this rulemaking to provide a forum for the development and implementation of policies to guide the Commission’s review of investments proposed by the Electrical Corporations in pursuit of transportation electrification. The original Staff Proposal from Energy Division issued on February 3, 2020 was over 200 pages long and divided into 12 sections. An updated Staff Proposal was issued February 25, 2022. There are nearly two dozen active parties. With the multitude of issues in this proceeding, many parties agreed on some issues but disagreed on others. For example, on the issue of TE Program Cost Recovery and Allocation, UCAN and Cal Advocates disagreed with the Staff Proposal’s recommendation that TE program costs be recovered through distribution rates. Instead, UCAN and Cal Advocates recommended TE program costs be recovered on an equal cents per kilowatt-hour (kWh) basis through the Public Purpose Program (PPP) surcharge because the TE program serves a broader social interest and its costs are direct subsidies by ratepayers who do not use the charging infrastructure to those who do. SCE argued that allocating all TE program costs through a PPP surcharge would increase rates unnecessarily in the rate classes expected to adopt MDHD technologies. PG&amp;E and CLECA both supported the recommendation to recover costs through distribution rates. This is just one example of where parties offered a multiplicity of proposals and recommendations. Because no parties were aligned on all of the issues, yet all parties provided analysis and discussion on certain issues, duplication</p>		

<sup>2</sup> 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.

of effort was kept to a minimum. Due to the complexity and number of issues addressed in this decision, UCAN urges the Commission to find any duplication of efforts was minor and therefore reasonable.	
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**C. Additional Comments on Part II: *(use line reference # or letter as appropriate)***

#	Intervenor’s Comment	CPUC Discussion

**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><b>a. Intervenor’s claim of cost reasonableness:</b></p> <p>UCAN seeks a total intervenor compensation award of \$50,242.50 as the reasonable cost of its participation in this portion of the proceeding. This amount includes time for UCAN’s representative, experts, and support staff. UCAN urges the Commission to find these costs reasonable in light of its substantial contribution to the record detailed in Part II (A) above as well as the importance of the issues UCAN addressed for the protection of ratepayers (i.e. the importance of fairly allocating TE cost recovery so as not to unfairly burden ratepayers; the elimination of all IOU ownership of BTM infrastructure thereby reducing the cost burden of capitalized IOU expenditures on ratepayers; the need for a complete audit of TE related data to understand system costs, needs and ratemaking – issues that most affect ratepayer pocketbooks.)</p> <p>Also noted above, this proceeding began on December 13, 2018 with the ambitious goal of developing a comprehensive framework to guide the Commission’s role in the electrification of California’s transportation sector. This included the February 3, 2020 Staff Proposal from Energy Division that is over 200 pages long and divided into twelve sections. There were numerous rulings in this proceeding including the Assigned Commissioner’s Ruling adding an updated Staff Proposal on February 25, 2022 (to which UCAN is including hours in this present claim). UCAN, working closely with experts, provided analysis and feedback on different sections and ALJ questions to help inform the record. Given the number of</p>	

<p>UCAN contributions to the final decisions, UCAN believes that the \$50,242.50 cost of participation is reasonable.</p>																						
<p><b>b. Reasonableness of hours claimed:</b></p> <p>In this proceeding, UCAN is claiming 52.25 hours of time for representative Ms. Jane Krikorian, 30.25 hours of time for expert Mary Neal, 60.75 hours of time for expert Michelle Mann, and 38 hours for expert Brandon Charles. The hours listed here are for their substantive work in this proceeding. The amounts listed here are for hours spent examining the issues and exclude hours for NOI and intervenor compensation request preparation.</p> <p>This proceeding is unique in that it is trying to determine an overall TE Framework amidst a rapidly evolving TE landscape. As noted above, this decision resolves the transportation electrification framework policy and program design topics that have been under consideration since 2020. Therefore, UCAN is claiming hours from May 2020 through June 2020 for comments and reply comments on Sec. 3.4 (Targets and Metrics) even though not mentioned in this decision because this topic was also covered in the later issued Staff Proposal on February 25, 2022 where UCAN was mentioned for its work on targets and metrics (see Issue 6 in Part II (A) above). UCAN is also claiming hours for a TEF Scorecard Workshop on June 8, 2020 because this participation helped inform UCAN’s work for the benefit of ratepayers. Without appropriate targets and metrics ratepayer investments could be poorly tracked and evaluated thus ending up being wasteful. Because of the contribution UCAN believes it made in assisting the Commission regarding certain issues in the TE Framework and in particular protecting and guarding ratepayers from wasteful spending, UCAN believes the total amount of hours request for reimbursement is reasonable.</p> <p>UCAN total amount of hours claimed = 189.50 (181.25 substantive hours and 8.25 for intervenor compensation work).</p>																						
<p><b>c. Allocation of hours by issue:</b></p> <table border="1"> <thead> <tr> <th>Total Hours</th> <th>% of Hours per Issue</th> <th>Issues</th> </tr> </thead> <tbody> <tr> <td>0.25</td> <td>0.14%</td> <td>1. General Prep (GP)</td> </tr> <tr> <td>10.00</td> <td>5.52%</td> <td>2. Hearings, Workshops, and Conferenc</td> </tr> <tr> <td>171.00</td> <td>94.34%</td> <td>3. Filings (F)</td> </tr> <tr> <td>0.00</td> <td>0.00%</td> <td>4. Discovery (D)</td> </tr> <tr> <td>0.00</td> <td>0.00%</td> <td>5. Testimony (T)</td> </tr> <tr> <td>0.00</td> <td>0.00%</td> <td>6. Coordination (C)</td> </tr> </tbody> </table>	Total Hours	% of Hours per Issue	Issues	0.25	0.14%	1. General Prep (GP)	10.00	5.52%	2. Hearings, Workshops, and Conferenc	171.00	94.34%	3. Filings (F)	0.00	0.00%	4. Discovery (D)	0.00	0.00%	5. Testimony (T)	0.00	0.00%	6. Coordination (C)	
Total Hours	% of Hours per Issue	Issues																				
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0.00	0.00%	5. Testimony (T)																				
0.00	0.00%	6. Coordination (C)																				

0.00	0.00%	7. Evidentiary Hearings (EH)	
0.00	0.00%	8. Settlement (S)	
<b>181.25</b>	<b>100.00%</b>		

**B. Specific Claim:\***

CLAIMED						CPUC AWARD		
<b>ATTORNEY, EXPERT, AND ADVOCATE FEES</b>								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Jane Krikorian	2020	25.25	\$265	D.21-04-012	\$6,691.25			
Jane Krikorian	2021	0.50	\$350	D.21-12-050	\$175.00			
Jane Krikorian	2022	26.50	\$350	D.21-12-050	\$9,275.00			
Mary Neal	2020	30.25	\$315	D.21-12-050	\$9,528.75			
Brandon Charles	2020	38.00	\$250	D.20-07-031	\$9,500.00			
Michelle Mann	2020	60.75	\$225	D.21-12-050	\$13,668.75			
<i>Subtotal: \$48,838.75</i>						<i>Subtotal: \$</i>		
<b>OTHER FEES</b>								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
<i>Subtotal: \$0</i>						<i>Subtotal: \$</i>		
<b>INTERVENOR COMPENSATION CLAIM PREPARATION **</b>								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Jane Krikorian	2023	7.75	\$175	D.21-12-050	\$1,356.25			

Courtney Cook-Sloan	2022	.25	\$95	D.22-04-024	\$23.75			
Courtney Cook-Sloan	2023	.25	\$95	D.22-04-024	\$23.75			
<b>Subtotal: \$1,403.75</b>						<b>Subtotal: \$</b>		
<b>COSTS</b>								
<b>#</b>	<b>Item</b>	<b>Detail</b>			<b>Amount</b>	<b>Amount</b>		
1.								
2.								
<b>Subtotal: \$</b>						<b>Subtotal: \$</b>		
<b>TOTAL REQUEST: \$50,242.50</b>						<b>TOTAL AWARD: \$</b>		
<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. Intervenors' 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>								
<b>ATTORNEY INFORMATION</b>								
<b>Attorney</b>		<b>Date Admitted to CA BAR<sup>3</sup></b>		<b>Member Number</b>		<b>Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation</b>		

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

Attachment or Comment #	Description/Comment
	Certificate of Service

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

**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))***

<b>A. Opposition: Did any party oppose the Claim?</b>	
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If so:

Party	Reason for Opposition	CPUC Discussion

<b>B. Comment Period: Was the 30-day comment period waived <i>(see Rule 14.6(c)(6))</i>?</b>	
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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. D. 22-11-040.
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 75<sup>th</sup> 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. 22-11-040		
Proceeding(s):	R.18-12-006		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
UTILITY CONSUMERS' ACTION NETWORK	1/20/2023	\$50,242.50		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Jane	Krikorian	Public Policy Analyst	\$265	2020	
Jane	Krikorian	Public Policy Analyst	\$350	2021	
Jane	Krikorian	Public Policy Analyst	\$350	2022	
Jane	Krikorian	Public Policy Analyst	\$350	2023	
Brandon	Charles	Expert	\$250	2020	
Mary	Neal	Energy and Resource Expert	\$315	2020	
Michelle	Mann	Mechanical Engineer Expert	\$225	2020	
Courtney	Cook-Sloan	Paralegal Manager	\$190	2022	
Courtney	Cook-Sloan	Paralegal Manager	\$190	2023	

**(END OF APPENDIX)**

**R.18-12-006-UTILITY CONSUMERS' ACTION NETWORK'S TIMESHEET**

<b>UCAN's Regulatory Program Manager Jane Krikorian</b>				
<b>Date</b>	<b>Case #</b>	<b>Hours</b>	<b>Issue</b>	<b>Notes</b>
5/8/2020	R.18-12-006	1	F	Review Comment from MRW on Sec 3.4
5/11/2020	R.18-12-006	2.25	F	Reading and editing Comments on Sec 3.4
5/26/2020	R.18-12-006	0.25	F	Discussion w/ Brandon Charles re: Reply Comments
6/8/2020	R.18-12-006	5	HWC	Attending workshop
6/9/2020	R.18-12-006	2	HWC	Attending Workshop
6/17/2020	R.18-12-006	1	F	Reading and editing UCAN's Reply Comments
6/18/2020	R.18-12-006	0.5	F	Discussion w/ Brandon Charles re: Reply Comments
6/19/2020	R.18-12-006	1	F	Reading and making final edits to Reply Comments
9/4/2020	R.18-12-006	1	F	Conference call w Mary Neal and Michelle Mann 9, 10, 12
9/5/2020	R.18-12-006	2	F	Reading Sec 9 for Comments due 9/11
9/8/2020	R.18-12-006	1.25	F	Reading Sec 10 for Comments due 9/11
9/8/2020	R.18-12-006	1.5	F	Reading Sec 12
9/10/2020	R.18-12-006	1	F	Conference call w/ experts re: Comments due 9/11 Sec 9, 10, 12
9/11/2020	R.18-12-006	4	F	Writing and editing on TEF Sec 9, 10, 12
9/22/2020	R.18-12-006	0.5	F	Conference call w/ Mary Neal and Michelle Mann re: Reply Comments on Sec 9, 10, 12
9/24/2020	R.18-12-006	0.75	F	Reading and reviewing Reply Comments 9, 10, 12
9/24/2020	R.18-12-006	0.25	F	Emailing Mary Neal and Michelle Mann re: Reply Comments
4/22/2021	R.18-12-006	0.5	F	Conference call w/ expert re: Reply Comments supporting TURN's Proposal
4/11/2022	R.18-12-006	1.5	F	Reading ACR
4/18/2022	R.18-12-006	2	F	Reading ACR & Energy Division Proposal
4/22/2022	R.18-12-006	1.5	F	Reading ACR, previous UCAN TEF Comments for response to ED Staff Report
4/23/2022	R.18-12-006	1	F	Writing Comments on Staff Report-Outline
4/23/2022	R.18-12-006	2	F	Reading Energy Divisions proposal
4/24/2022	R.18-12-006	0.5	F	Reading Energy Divisions proposal
4/24/2022	R.18-12-006	2	F	Writing Comments on ED Proposal
4/24/2022	R.18-12-006	1	F	Reading sections 5&6 of ED proposal
4/25/2022	R.18-12-006	2	F	Writing Comments on Staff Proposal
4/25/2022	R.18-12-006	1.5	F	Writing Comments on Staff Proposal
4/25/2022	R.18-12-006	0.5	F	Reviewing and editing Comments on Staff Proposal
4/28/2022	R.18-12-006	0.25	GP	Reading D.22-04-046 extending statutory deadline
5/5/2022	R.18-12-006	0.5	F	Reading EDF's Comments for Reply Comments
5/6/2022	R.18-12-006	0.5	F	Reading CalPA's Comments for Reply Comments
5/6/2022	R.18-12-006	0.5	F	Outlining Reply Comments
5/10/2022	R.18-12-006	1.25	F	Reading CalPA's and SDG&E's Comments for Reply Comments
5/11/2022	R.18-12-006	0.75	F	Reading TURN's Comments for Reply Comments
5/11/2022	R.18-12-006	0.25	F	Preparing draft Reply Comments
5/12/2022	R.18-12-006	1.5	F	Writing Reply Comments
5/12/2022	R.18-12-006	0.75	F	Writing Reply Comments
5/13/2022	R.18-12-006	1.75	F	Writing Reply Comments
5/13/2022	R.18-12-006	2	F	Writing Reply Comments
5/16/2022	R.18-12-006	1	F	Reviewing and editing final draft of Reply Comments

**Total Issues:**

<b>52.25</b>
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**Intervener Compensation**

1/17/2023	R.18-12-006	1.75	ICOMP	Working on ICOMP
1/18/2023	R.18-12-006	2	ICOMP	Working on ICOMP
1/19/2023	R.18-12-006	4	ICOMP	Working on ICOMP

**Total Int. Comp.:**

7.75

**2020**

Total Hours	% of Hours per Issue	Issue
25.25	100.00%	Issues (inclusive)
0.00	0.00%	NOI and Intervenor Compensation Claim
<b>25.25</b>	<b>100.00%</b>	

**Total 2020:**

**2021**

Total Hours	% of Hours per Issue	Issue
0.50	100.00%	Issues (inclusive)
0.00	0.00%	NOI and Intervenor Compensation Claim
<b>0.50</b>	<b>100.00%</b>	

**Total 2021:**

**2022**

Total Hours	% of Hours per Issue	Issue
26.50	100.00%	Issues (inclusive)
0.00	0.00%	NOI and Intervenor Compensation Claim
<b>26.50</b>	<b>100.00%</b>	

**Total 2022:**

**2023**

Total Hours	% of Hours per Issue	Issue
0.00	0.00%	Issues (inclusive)
7.75	100.00%	NOI and Intervenor Compensation Claim
<b>7.75</b>	<b>100.00%</b>	

**Total 2023:**

**Cumulative Totals**

Total Hours	% of Hours per Issue	Issue
0.25	0.48%	1. General Prep (GP)
7.00	13.40%	2. Hearings, Workshops, and Conferences (HWC)
45.00	86.12%	3. Filings (F)
0.00	0.00%	4. Discovery (D)
0.00	0.00%	5. Testimony (T)
0.00	0.00%	6. Coordination (C)
0.00	0.00%	7. Evidentiary Hearings (EH)
0.00	0.00%	8. Settlement (S)
<b>52.25</b>	<b>100.00%</b>	

**Total Issues:**

**Total Int. Compensation:**

7.75

**Total Hours :**

**60.00**

UCAN's Expert Brandon Charles				
Date	Case #	Hours	Issue	Notes
4/20/2020	R.18-12-006	3.00	HWC	Workshop re: Energy Division TEF staff proposal Sections 2 through 5
4/20/2020	R.18-12-006	0.50	F	Analyze parties' opening comments re: Energy Division TEF staff proposal Sections 2 through 5

4/21/2020	R.18-12-006	0.50	F	Analyze parties' opening comments re: Energy Division TEF staff proposal Sections 2 through 5
4/22/2020	R.18-12-006	1.00	F	Analyze parties' opening comments re: Energy Division TEF staff proposal Sections 2 through 5
4/22/2020	R.18-12-006	0.50	F	Call with E. Borden, E. Torres, J. Krikorian re: TEF Sections 2-5 reply comments and overall goals
4/22/2020	R.18-12-006	1.50	F	Draft reply comments re: Energy Division TEF staff proposal Sections 2, 3, and 4
4/24/2020	R.18-12-006	2.00	F	Draft reply comments re: Energy Division TEF staff proposal Sections 2, 3, and 4
4/27/2020	R.18-12-006	0.50	F	Analyze TURN comments re: Energy Division TEF staff proposal Sections 2 through 5
4/27/2020	R.18-12-006	1.50	F	Draft reply comments re: Energy Division TEF staff proposal Sections 2 through 5
6/29/2020	R.18-12-006	1.00	F	Draft comments re: Energy Division staff draft TEF Sections 7 and 8
4/23/2020	R.18-12-006	0.50	F	Meet with MNN re: Issues for follow up in TEF staff proposal Sections 3.4 and 11.3
4/29/2020	R.18-12-006	0.50	F	Call with J. Krikorian re: Comments on Energy Division TEF Staff Proposal Sections 3.4 and 11
4/30/2020	R.18-12-006	1.50	F	Analyze Energy Division TEF staff proposal Section 3.4 and Appendix E
4/30/2020	R.18-12-006	0.50	F	Meet with MNN re: Energy Division TEF Staff Proposal Section 3.4 comments
5/1/2020	R.18-12-006	1.25	F	Draft comments re: Energy Division TEF staff proposal Sections 3.4 and 11
5/4/2020	R.18-12-006	2.00	F	Draft comments re: Energy Division TEF staff proposal Sections 3.4 and 11
5/7/2020	R.18-12-006	0.75	F	Meet with MNN re: Energy Division TEF staff proposal Sections 3.4 and 11.3 comments
5/7/2020	R.18-12-006	2.50	F	Draft comments re: Energy Division TEF staff proposal Sections 3.4 and 11.3
5/8/2020	R.18-12-006	3.00	F	Draft comments re: Energy Division TEF staff proposal Sections 3.4 and 11.3
5/29/2020	R.18-12-006	0.50	F	Meet with MAM re: Energy Division TEF Staff Proposal Section 3.4 reply comments
6/4/2020	R.18-12-006	0.50	F	Meet with MNN, MAM re: Energy Division staff draft TEF Section 3.4 reply comments
6/8/2020	R.18-12-006	4.00	F	Workshop re: Energy Division staff draft TEF Section 3.4
6/9/2020	R.18-12-006	2.50	F	Workshop re: Energy Division staff draft TEF Section 3.4
6/10/2020	R.18-12-006	0.25	F	Meet with MNN, MAM re: Energy Division staff draft TEF Section 3.4 reply comments
6/15/2020	R.18-12-006	1.50	F	Draft reply comments re: Energy Division staff draft TEF Section 3.4
6/16/2020	R.18-12-006	2.00	F	Draft reply comments re: Energy Division staff draft TEF Section 3.4
6/18/2020	R.18-12-006	1.50	F	Draft reply comments re: Energy Division staff draft TEF Section 3.4
6/18/2020	R.18-12-006	0.25	F	Call with J. Krikorian re: Energy Division staff draft TEF Section 3.4 reply comments
6/19/2020	R.18-12-006	0.50	F	Draft reply comments re: Energy Division staff draft TEF Section 3.4

**Total Issues:**

**38.00**

**2020**

Total Hours	% of Hours per Issue	Issue
38.00	100.00%	Issues (inclusive)
0.00	0.00%	NOI and Intervenor Compensation Claim

**Total 2020:**

**38.00**

**100.00%**

**Cumulative Totals**

Total Hours	% of Hours per Issue	Issue
0.00	0.00%	1. General Prep (GP)
3.00	7.89%	2. Hearings, Workshops, and Conferences (HWC)
35.00	92.11%	3. Filings (F)
0.00	0.00%	4. Discovery (D)
0.00	0.00%	5. Testimony (T)
0.00	0.00%	6. Coordination (C)
0.00	0.00%	7. Evidentiary Hearings (EH)
0.00	0.00%	8. Settlement (S)

**Total Issues:**

**38.00**

**100.00%**

**Total Int. Compensation:**

**0.00**

Total Hours :

38.00

UCAN's Expert Mary Neal				
Date	Case #	Hours	Issue	Notes
04/23/20	R.18-12-006	0.50	F	Meet with BJC re: Issues for follow up in TEF staff proposal Sections 3.4 and 11.3
04/23/20	R.18-12-006	1.00	F	Review sections 3.4 and 11.3 of draft TEF for issues for comments
04/30/20	R.18-12-006	0.50	F	Meet with BJC re: Energy Division TEF Staff Proposal Section 3.4 comments
05/06/20	R.18-12-006	1.00	F	Edit draft comments on TEF section 3.4
05/07/20	R.18-12-006	0.75	F	Meet with BJC re: Energy Division TEF staff proposal Sections 3.4 and 11.3 comments
05/07/20	R.18-12-006	0.50	F	Edit draft TEF comments on section 3.4
06/04/20	R.18-12-006	1.00	F	Meet with BJC, MAM re: Draft reply comments on Section 3.4 of Staff TEF
06/09/20	R.18-12-006	0.50	F	Call with BJC re: TEF workshop and reply comments
06/10/20	R.18-12-006	0.25	F	Meet with MAM, BJC re: Energy Division staff draft TEF Section 3.4 reply comments
09/03/20	R.18-12-006	4.50	F	Read and draft outline of comments on TEF sections 9, 10, and 12
09/04/20	R.18-12-006	1.00	F	Call with J. Krikorian, MAM re: TEF comments on Sections 9, 10, and 12
09/04/20	R.18-12-006	3.00	F	Edit outline of comments on TEF sections 9, 10, and 12
09/04/20	R.18-12-006	0.50	F	Call with MAM re: Comments on TEF sections 9, 10, and 12
09/08/20	R.18-12-006	4.25	F	Write comments on Staff TEF sections 9, 10, and 12
09/09/20	R.18-12-006	4.75	F	Continue to write comments on Staff TEF sections 9, 10, and 12
09/10/20	R.18-12-006	0.75	F	Call with J. Krikorian, MAM re: Draft comments on Staff TEF sections 9, 10, and 12
09/10/20	R.18-12-006	4.00	F	Continue to write comments on Staff TEF sections 9, 10, and 12
09/11/20	R.18-12-006	0.25	F	Final edits to comments on Staff TEF sections 9, 10, and 12
09/22/20	R.18-12-006	0.25	F	Read comments on TEF section 9, 10, and 12
09/22/20	R.18-12-006	0.50	F	Call with J. Krikorian, MAM re: Reply comments on TEF section 9
09/24/20	R.18-12-006	0.50	F	Edit reply comments on TEF section 9

Total Combined Issues:

30.25

2020

Total Hours	% of Hours per Issue	Issue
30.25	100.00%	Issues (inclusive)
0.00	0.00%	NOI and Intervenor Compensation Claim
<b>Total 2020:</b>	<b>30.25</b>	<b>100.00%</b>

Cumulative Totals

Total Hours	% of Hours per Issue	Issue
0.00	0.00%	1. General Prep (GP)
0.00	0.00%	2. Hearings, Workshops, and Conferences (HWC)
30.25	100.00%	3. Filings (F)
0.00	0.00%	4. Discovery (D)
0.00	0.00%	5. Testimony (T)
0.00	0.00%	6. Coordination (C)
0.00	0.00%	7. Evidentiary Hearings (EH)
0.00	0.00%	8. Settlement (S)
<b>Total Issues:</b>	<b>30.25</b>	<b>100.00%</b>

Total Int. Compensation:

0.00

Total Hours :

30.25

UCAN's Expert Michelle Mann				
Date	Case #	Hours	Issue	Notes
05/06/20	R.18-12-006	1.00	F	Draft comments re: Energy Division TEF staff proposal Sections 3.4
05/08/20	R.18-12-006	0.50	F	Review Energy Division TEF staff proposal
05/11/20	R.18-12-006	2.00	F	Review Energy Division TEF staff proposal
05/29/20	R.18-12-006	0.50	F	Meet with BJC re: Energy Division TEF Staff Proposal Section 3.4 reply comments
05/29/20	R.18-12-006	2.00	F	Draft reply comments re: Energy Division TEF staff proposal Section 3.4
06/01/20	R.18-12-006	2.50	F	Analyze parties' comments re: Energy Division staff draft TEF Section 3.4
06/02/20	R.18-12-006	2.50	F	Analyze parties' comments re: Energy Division staff draft TEF Section 3.4
06/03/20	R.18-12-006	1.00	F	Analyze parties' comments re: Energy Division staff draft TEF Section 3.4
06/04/20	R.18-12-006	1.00	F	Meet with BJC, MNN re: Energy Division staff draft TEF Section 3.4 reply comments
06/08/20	R.18-12-006	2.00	F	Draft reply comments re: Energy Division staff draft TEF Section 3.4
06/09/20	R.18-12-006	4.00	F	Draft reply comments re: Energy Division staff draft TEF Section 3.4
06/10/20	R.18-12-006	1.00	F	Draft reply comments re: Energy Division staff draft TEF Section 3.4
06/10/20	R.18-12-006	0.25	F	Meet with MNN, BJC re: Energy Division staff draft TEF Section 3.4 reply comments
06/10/20	R.18-12-006	1.00	F	Draft reply comments re: Energy Division staff draft TEF Section 3.4
06/17/20	R.18-12-006	1.00	F	Draft reply comments re: Energy Division staff draft TEF Section 3.4
06/30/20	R.18-12-006	1.00	F	Analyze Electric Rule 15 and 16 requirements
09/03/20	R.18-12-006	2.00	F	Read TEF Section 9 in preparation for comments
09/04/20	R.18-12-006	4.00	F	Read TEF sections 11 and 12
09/04/20	R.18-12-006	2.50	F	Draft comments on TEF sections 9, 10, 12
09/04/20	R.18-12-006	1.00	F	Call with J. Krikorian, MNN re: TEF sections 9, 10, 12 comments
09/04/20	R.18-12-006	0.50	F	Call with MNN re: TEF sections 9, 10, 12 comments
09/08/20	R.18-12-006	6.00	F	Draft TEF comments for Section 9, 10 and 12
09/09/20	R.18-12-006	3.00	F	Continue to write comments for Section 9, 10 and 12
09/09/20	R.18-12-006	5.00	F	Research information for comments on Section 9 and 12
09/10/20	R.18-12-006	0.75	F	Call with J. Krikorian, MNN re: TEF 9, 10, and 12 comments
09/10/20	R.18-12-006	4.75	F	Draft comments for TEF sections 9 and 12
09/22/20	R.18-12-006	0.50	F	Call with J. Krikorian, MNN re: Reply comments for section 9, 10 and 12
09/23/20	R.18-12-006	5.00	F	Draft section 9, 10, and 12 reply comments
09/24/20	R.18-12-006	2.50	F	Edit section 9, 10, and 12 reply comments

Total Combined Issues:

60.75

2020

Total Hours	% of Hours per Issue	Issue
60.75	100.00%	Issues (inclusive)
0.00	0.00%	NOI and Intervenor Compensation Claim
<b>60.75</b>	<b>100.00%</b>	

Total 2020:

Cumulative Totals

Total Hours	% of Hours per Issue	Issue
0.00	0.00%	1. General Prep (GP)
0.00	0.00%	2. Hearings, Workshops, and Conferences (HWC)
60.75	100.00%	3. Filings (F)
0.00	0.00%	4. Discovery (D)

	0.00	0.00%	5. Testimony (T)
	0.00	0.00%	6. Coordination (C)
	0.00	0.00%	7. Evidentiary Hearings (EH)
	0.00	0.00%	8. Settlement (S)
<b>Total Issues:</b>	<b>60.75</b>	<b>100.00%</b>	

**Total Int. Compensation: 0.00**

**Total Hours :** 60.75

UCAN's Paralegal Manager Courtney Cook-Sloan				
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Date	Case #	Hours	Issue	Notes
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**Intervenor Compensation**

12/5/2022	R.18-12-006	0.25	ICOMP	Drafting ICOMP
1/20/2023	R.18-12-006	0.25	ICOMP	Finalizing ICOMP

**Total Int. Comp.: 0.50**

**2022**

Total Hours	% of Hours per Issue	Issue
0.00	100.00%	Issues (inclusive)
0.25	0.00%	NOI and Intervenor Compensation Claim

**Total 2022: 0.25 100.00%**

**2023**

Total Hours	% of Hours per Issue	Issue
0.00	100.00%	Issues (inclusive)
0.25	0.00%	NOI and Intervenor Compensation Claim

**Total 2023: 0.25 100.00%**

**Cumulative Totals**

Total Hours	% of Hours per Issue	Issue
0.00	0.00%	1. General Prep (GP)
0.00	0.00%	2. Hearings, Workshops, and Conferences (HWC)
0.00	0.00%	3. Filings (F)
0.00	0.00%	4. Discovery (D)
0.00	0.00%	5. Testimony (T)
0.00	0.00%	6. Coordination (C)
0.00	0.00%	7. Evidentiary Hearings (EH)
0.00	0.00%	8. Settlement (S)

**Total Issues: 0.00 0.00%**

**Total Int. Compensation: 0.00**

**Total Hours :** 0.00

UCAN'S Cumulative Hours				
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**2020**

Total Hours	% of Hours per Issue	Issue
154.25	100.00%	Issues (inclusive)



		0.00	0.00%	NOI and Intervenor Compensation Claim
<b>Total 2020:</b>		<b>154.25</b>	<b>100.00%</b>	

2021

Total Hours	% of Hours per Issue		Issue
0.50	100.00%	Issues (inclusive)	
0.00	0.00%	NOI and Intervenor Compensation Claim	

**Total 2020:**

**0.50 100.00%**

2022

Total Hours	% of Hours per Issue		Issue
26.50	99.07%	Issues (inclusive)	
0.25	0.93%	NOI and Intervenor Compensation Claim	

**Total 2022:**

**26.75 100.00%**

2023

Total Hours	% of Hours per Issue		Issue
0.00	0.00%	Issues (inclusive)	
8.00	100.00%	NOI and Intervenor Compensation Claim	

**Total 2023:**

**8.00 100.00%**

**Cumulative Totals**

Total Hours	% of Hours per Issue		Issue
0.25	0.14%	1. General Prep (GP)	
10.00	5.52%	2. Hearings, Workshops, and Conferences (HWC)	
171.00	94.34%	3. Filings (F)	
0.00	0.00%	4. Discovery (D)	
0.00	0.00%	5. Testimony (T)	
0.00	0.00%	6. Coordination (C)	
0.00	0.00%	7. Evidentiary Hearings (EH)	
0.00	0.00%	8. Settlement (S)	

**Total Issues:**

**181.25 100.00%**

**Total Int. Compensation:**

**8.25**

**Total Hours:**

**189.50**