



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)

**INTERVENOR COMPENSATION CLAIM OF SMALL BUSINESS UTILITY  
ADVOCATES (SBUA)  
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF SMALL BUSINESS  
UTILITY ADVOCATES (SBUA)**

**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](mailto:icompcordinator@cpuc.ca.gov)

<b>Intervenor:</b> Small Business Utility Advocates (SBUA)	<b>For contribution to Decision (D.) 22-11-040</b>	
<b>Claimed:</b> \$139,971.25	<b>Awarded:</b> \$	
<b>Assigned Commissioner:</b> Clifford Rechtschaffen	<b>Assigned ALJ:</b> Brian Korpics & Marcelo Poirier	
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>	/s/ Jennifer Weberski	
<b>Date:</b> January 20, 2023	<b>Printed Name:</b>	Jennifer Weberski

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

<b>A. Brief description of Decision:</b>	<p>D.22-11-040 adopts a long-term transportation electrification policy framework that includes a third-party administered statewide transportation electrification infrastructure rebate program and directs the California electrical corporations to jointly fund the program and associated activities.</p> <p>D.22-11-040 resolves the transportation electrification framework policy and program design topics that have been</p>
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	under consideration since 2020 and adopts the most important elements of the statewide infrastructure rebate program. Additional program guidelines will be established in a subsequent decision and Advice Letters.
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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:	April 1, 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.22-02-005, <i>et. al.</i>	
6. Date of ALJ ruling:	August 2, 2022	
7. Based on another CPUC determination (specify):		
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.22-02-005, <i>et. al.</i>	
10. Date of ALJ ruling:	August 2, 2022	
11. Based on another CPUC determination (specify):		
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	

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

	<b>Intervenor</b>	<b>CPUC Verification</b>
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
<p><b><u>1. Overall Transportation Electrification Framework and Decision</u></b></p> <p>The large overarching nature of the proceeding, specifically the issues involved in the Transportation Electrification Framework (TEF) required parties to file comments in stages. SBUA experts analyzed a breadth of TEF issues and participated in numerous workshops, and SBUA filed numerous written comments throughout the stages of the proceeding.</p> <p>SBUA filed comprehensive comments on March 6, 2020 that specifically responded to the delineated questions associated with the TEF. SBUA’s responses included comments on Chapters 2-5 but provided responses to</p>	<p>“Given the number of unique topics within the Draft TEF, the Commission required parties to file comments in stages.” D.22-11-040, p. 4</p> <p>“On March 6, 2020, the following parties filed opening comments on Chapters 2-5 of the Draft TEF: ... Small Business Utility Advocates (SBUA)... . On April 27, 2020, the following parties filed reply comments on Chapters 2-5 of the Draft TEF: ...SBUA...” D.22-11-040, pp. 4-5.</p> <p>“On August 21, 2020, the following parties filed opening comments on Chapters 6 and 11 of the Draft TEF: ...SBUA... On September 4, 2020, the following parties filed reply comments on Chapters 6 and 11 of the Draft TEF:...SBUA...” D.22-11-040, pp.6-7.</p> <p>“On September 11, 2020, the following parties filed opening comments on Chapters 9, 10, and 12 of the Draft TEF:...SBUA...” D.22-11-040, p. 7.</p>	

<p>additional chapters as well. Each of SBUA’s responses focused on the impact on small businesses. <i>See Opening Comments of Small Business Utility Advocates on to the Draft Transportation Electrification Framework, dated March 6, 2020.</i></p> <p>Pursuant to the February 14, 2020, ALJ email ruling, SBUA filed Reply Comments on April 27, 2020. SBUA’s reply comments focused upon the issues discussed in the March 23, 2020 and April 20, 2020 workshops. SBUA disagreed with a purely economic approach but rather suggested a broader approach to cost effectiveness. <i>See, Reply Comments of Small Business Utility Advocates to the Draft Transportation Electrification Framework, dated April 27, 2020.</i></p> <p>On June 22, 2020, SBUA filed Reply Comments on Sections 3.4 and 11.3 of the TEF. SBUA’s comments were associated with the June 8 and 9, 2020 workshops on scorecards, targets and metrics. The hours associated by our experts with the June 22, 2020 Reply Comments have not been previously claimed. <i>See, Reply Comments of Small Business Utility Advocates on Sections 3.4 and 11.3 of the Transportation Electrification Framework, dated June 22, 2020.</i> (Previous Commission decisions, specifically D.20-</p>	<p>“Three workshops held after the issuance of the Draft TEF sought stakeholder feedback on how to move forward with the Draft TEF. On March 23, 2020, a remote workshop addressed topics related to Chapters 3.1, 4, and 5 of the Draft TEF. On April 20, 2020, a remote workshop addressed Chapter 4, and on June 8 and 9, 2020, a remote workshop addressed Chapter 3.4.” D.22-11-040, p. 8. SBUA participated in these workshops.</p> <p>“On February 25, 2022, an Assigned Commissioner’s Ruling issued and requested comments on the Energy Division Staff Proposal to Establish Transportation Electrification Funding Cycles and Statewide Behind-the-Meter Program (Staff Proposal). The following parties submitted opening comments on the Staff Proposal by the April 25, 2022 deadline:... SBUA...” D.22-11-040, p. 15.</p> <p>“In this decision, the Commission addresses both the outstanding issues from the Draft TEF and the Staff Proposal.” D.22-11-040, p.17.</p> <p>“The proposed decision of Commissioner Clifford Rechtschaffen in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission’s Rules of Practice and Procedure. On November 3, 2022, the following parties filed opening comments: ...SBUA...” D.22-11-040, p. 190. <i>See, Opening Comments of Small Business Utility Advocates to the October 14, 2022 Proposed Decision Regarding the Transportation</i></p>	
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<p>12-027 and 21-12-029 ruled on small portions of the TEF, SBUA has previously filed for compensation on those limited portions and is not requesting for previously requested hours.)</p> <p>SBUA filed Opening Comments on Chapter 9 on September 11, 2020, in which SBUA advocated for specific rate design guidance in the final TEF. <i>See, Opening Comments of Small Business Utility Advocates on Section 9 of the Draft Transportation Electrification Framework, dated September 11, 2020.</i></p>	<p><i>Electrification Framework, dated November 3, 2022.</i></p>	
<p><b><u>2. TEF Chapter 3 – TEP Plans – Budgets</u></b></p> <p>As discussed above, SBUA filed comments regarding the various chapters in the TEF. With respect to Chapter 3 of the Draft TEF, it included recommendations on the Transportation Electrification Plan (TEP) framework. The Draft TEF recommended that the Commission direct each IOU to develop a ten-year TEP to complete more holistic TE portfolio and grid planning and to create a roadmap for ratepayer-supported TE investment programs moving forward. SBUA commented on the TEP recommendations, with respect to questions associated with Section 3.1 – budget, SBUA advocated that the budgets should be focused</p>	<p>“The Draft TEF recommends that the Commission direct each IOU to develop a ten-year TEP to complete more holistic TE portfolio and grid planning and to create a roadmap for ratepayer-supported TE investment programs moving forward.” D.22-11-040, p. 18.</p> <p>“SBUA similarly recommends that budgets be based on forecasts and that the IOUs justify increased spending if needed.</p> <p>In this decision, we decline to adopt the TEP framework and the associated proposals. The Staff Proposal takes parties’ comments on the proposed TEPs into consideration of its design of the funding cycle framework.” D.22-11-040, p. 21.</p>	

<p>on data and cost projections. See, <i>Opening Comments of SBUA, dated March 6, 2020, pp. 3-4.</i></p>		
<p><b><u>3. TEF Chapter 4 -IOU Role in Accelerating TE Infrastructure Deployment</u></b></p> <p>SBUA and its experts argued against having the IOUs participate in the development of a “market maturity assessment.” <i>SBUA Reply Comments on Draft TEF Ch. 2-5, pp. 3-4.</i> The Commission agreed.</p>	<p>“Many parties claim that the proposed market maturity assessment would be an overly complex process that would not provide sufficient information to understand the nascent TE market.” D.22-11-040, p. 25 (fn. 81 citing <i>SBUA Reply Comments</i>). “We agree with those parties that the proposal is premature...” <i>Id.</i>, p. 25.</p>	
<p><b><u>3. TEF Chapter 9 -TE Program Cost Recovery and Allocation &amp; Alternative Financing</u></b></p> <p>Chapter 9 of the Draft TEF included various recommendations regarding TE and customer rates. The Draft TEF requested party comment on whether IOUs should recover TE program costs through the distribution rate component of the customer’s bill. In its September 11, 2020 Opening Comments, SBUA stated that it “strongly agrees that transportation electrification program costs should not be recovered through distribution rates but are most appropriately recovered through the public purpose programs surcharge. Among other issues, SBUA is concerned about the disproportionate impact on small business rates that results</p>	<p>“The Draft TEF requests comment on whether IOUs should recover TE program costs through the distribution rate component of the customer’s bill. The Draft TEF also proposes to address the allocation factor for TE program costs through Phase 2 of the IOUs’ GRCs.” D.22-11-040, p. 46.</p> <p>“SBUA also opposes recovery of TE program costs through distribution rates and supports recovery through the PPP surcharge. SBUA contends that few, if any, of the TE program’s goals are to improve the reliability of the distribution system and the placing of the programs’ costs in distribution rates is misaligned with the goals established in legislation..” D.22-11-040, p. 47.</p> <p>“We find that moving forward the IOUs should 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 distribution rates. This method of cost recovery is consistent</p>	

<p>from the current practice.” See, <i>Opening Comments of SBUA, dated September 11, 2020, p. 13.</i></p> <p>While the Final Decision did ultimately allow for recovery through distribution rates, the Commission did consider and discuss SBUA’s proposal.</p> <p>The Final Decision also included a discussion of alternative financing and agreed with SBUA that R. 20-08-022 was the proper docket for such consideration. See, <i>Opening Comments of SBUA, dated September 11, 2020, p. 14.</i></p>	<p>with past TE program decisions, the majority of which require the IOUs to recover costs in either a one-way Balancing Account or one-way subaccount within their TE Balancing Accounts.</p> <p>We also require the IOUs to allocate FC1 program costs and all BTM TE program costs moving forward on an equal cents per kWh basis. This helps ensure that costs are distributed across all customer classes equitably. Further, parties’ comments described above do not account for the new EV Infrastructure Rules and, therefore, address both BTM and utility-side costs. As utility-side costs are not included in the program contemplated here, it is even more appropriate to adopt the equal cents per kWh approach.” D.22-11-040, pp.49-50.</p> <p>“SBUA argues that the Commission should address alternative financing efforts in R.20-08-022, the proceeding to investigate and design clean energy financing options for electricity and natural gas customers.</p> <p>We decline to take further action on alternative financing programs in this proceeding as we are addressing that topic in R.20-08-022, which focuses on the investigation and design of alternative financing programs for all clean energy technologies. That proceeding addresses outstanding issues that need further discussion, including the IOUs’ proposals on TE alternative financing pilots. Our consideration of alternative financing mechanisms for TE in R.20-08-022 ensures consistency in alternative financing program design and efficiently utilizes stakeholders’ and</p>	
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	<p>the Commission’s resources.” D.22-11-040, p. 51.</p>	
<p><b>4. <u>TEF Chapter 11 - ME&amp;O</u></b></p> <p>Chapter 11 of the Draft TEF provides recommendations on three disparate topics: (1) vehicle-grid integration (VGI); (2) marketing, education, and outreach (ME&amp;O) issues; and (3) the IOUs’ LCFS programs. SBUA previously filed for compensation associated with WGI and LCFS, but not for work associated with ME&amp;O.</p> <p>SBUA specifically addressed the issue of ME&amp;O in our August 21, 2020 Opening Comments on Section 11.2, advocating for an expanded scope of ME&amp;O activities designed to address the needs of small business customers, <i>See, Opening Comments of SBUA, dated 21, 2020 pp. 8-13.</i></p>	<p>“SBUA recommends the Commission direct the IOUs to engage with small businesses through improved ME&amp;O campaigns because utility TE ME&amp;O activities have generally overlooked small businesses, which constitute the majority of businesses in California and provide roughly half of the state’s jobs.” D.22-11-040, p. 63 (fn. 211 citing <i>SBUA Opening Comments on Draft TEF Chapters 6 and 11</i>, pp. 8-13).</p> <p>“Several parties provide recommendations regarding the scope of ME&amp;O activities.... SBUA emphasizes the importance of small business outreach, recommending that IOUs provide targeted, streamlined information on their website and through small-business account representatives. SBUA recommends a structure similar to existing energy efficiency consultations.</p> <p>We find that the scope of ME&amp;O work should include targeted outreach to: (1) underserved communities; (2) rural communities; (3) small businesses; and (4) tribal communities; and (5) workforce development, job training and placement, and certification organizations.” D.22-11-040, pp.120-121.</p>	
<p><b>5. <u>Staff Proposal Technical Assistance</u></b></p> <p>Pursuant to Commissioner Clifford Rechtschaffen’s February 25, 2022 assigned commissioner ruling (ACR) inviting party comment on a new Energy Division staff proposal (Staff Proposal),</p>	<p>“The Staff Proposal requests comment on whether this proposed scope of the TA programs is appropriate.</p> <p>Parties generally agree that the proposed scope is appropriate, but some parties recommend additions to the scope. SBUA recommends targeted outreach to small businesses..” D.22-11-040, pp. 117-118.</p>	



<p>SBUA filed comments on April 25, 2022 addressing the issued included in the revised Staff Proposal. SBUA addressed the scope of the technical assistance proposal and the proposed rebates. In both instances, SBUA advocated for greater inclusion and acknowledgement of the needs of small business customers. <i>See Opening Comments of SBUA, dated April 25, 2022, p. 19.</i></p>	<p>“Because additional development of TA and its scope is necessary prior to program launch, we direct the IOUs to host a workshop prior to adoption of the Program Handbook, including, but not limited to, the EVSPs, DR providers, environmental justice organizations, fleet customers, small business, and CCA representatives to better build out the scope of TA.” D.22-11-040, p. 119.</p>	
<p><b><u>6. Staff Proposal Medium-Duty and Heavy-Duty Customer Types Eligible for Higher Rebates</u></b></p> <p>As stated above, SBUA filed comments on the Staff Proposal on April 25, 2022 in which it discussed the need for rebates for the MDHD segment. <i>See, Opening Comments of SBUA, dated April 25, 2022, pp. 9-11.</i></p>	<p>“The Staff Proposal includes a recommendation to authorize higher rebates for certain underserved community customers within the MDHD segment.</p> <p>SBUA recommends adjusting rebate amounts or eligibility criteria for end-use sectors or geographic regions that demonstrate poor cost-effectiveness (<i>e.g.</i>, small businesses in underserved communities).</p> <p>We find merit in parties’ support of this section of the Staff Proposal.” D.22-11-040, p. 133.</p> <p>“The Staff Proposal asks parties whether the FC1 program should include a requirement for MDHD rebate recipients to purchase a certain number of EVs, as the Commission has adopted for existing IOU programs. SBUA cautions against adopting a purchase mandate for small businesses because separate entities (<i>e.g.</i>, suppliers, contractors, customers) may finance, own, and control vehicles, property, and TE infrastructure.” D.22-11-040, p. 156.</p> <p>“We find merit in parties’ positions on both sides of the issue. However, to</p>	

	<p>ensure FC1 rebates provide ratepayer benefits by encouraging the purchase and use of EVs, we adopt an MDHD EV purchase requirement. We require a minimum of one EV purchase, lease, or retrofit per charging port rebate. We also agree that there are scenarios that need additional consideration to implement an MDHD EV purchase mandate, including: (1) public or shared-charging ports and (2) small businesses. Therefore, we require the Program Handbook development process to finalize details of the purchase requirement for these contexts, including a possible exemption from the requirement and the process needed to request a waiver.” D.22-11-040, p. 157.</p>	
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**B. Duplication of Effort (§ 1801.3(f) and § 1802.5):**

	Intervenor’s Assertion	CPUC Discussion
<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> With respect to the proceeding, many parties filed comments, including but not limited to, The Utility Reform Network (TURN), National Diversity Coalition (NDC), Greenlining, Environmental Defense Fund (EDF), Electrify America, Natural Resources Defense Council (NRDC) and Joint CCA’s.		
<b>d. Intervenor’s claim of non-duplication:</b> SBUA’s advocacy differed from that of other consumer and intervenor parties, in that SBUA has a unique focus <i>exclusively</i> on the interests of small business community. Thus, SBUA sought to reduce overlap of efforts by presenting unique perspectives on the concerns of small business ratepayers as a group as opposed to other customer classes. Throughout its involvement in matters related to D.22-11-040, SBUA took all reasonable steps to coordinate its efforts with other parties and keep unnecessary duplication to a minimum.		

<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.

<p>Therefore, while other parties may have had positions that were similar to SBUA in some instances, the Commission should find that SBUA’s perspectives and goals were necessarily different from other parties and supplemented—not duplicated—any efforts on common issues. The Commission should find that all of the hours claimed by SBUA are reasonable and should be fully compensated.</p>	
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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>SBUA’s main objective for the proceeding was to protect and advance the interests of small business ratepayers that in the past have been underrepresented in utility proceedings, including proceedings related to electric vehicles and EV infrastructure. Small businesses are an important customer class to consider in the development of the Transportation Electrification Framework and other EV infrastructure. Small businesses exist throughout the state but are especially important to low-income and minority communities. SBUA participated in this proceeding to encourage EV policies and a framework that is beneficial to small businesses, which are often hard-to-reach customers.</p> <p>D.22-11-040 approves a \$1 billion budget for the Funding Cycle 1 (FC1) program, which will have significant benefits and costs to ratepayers, including small business customers. Given the magnitude of the program, it was reasonable for SBUA to spend significant time and energy to advocate on behalf of small business ratepayers. SBUA’s compensation request seeks an award of \$xx for work performed related to D.22-11-040. The Commission should find this is a reasonable request for fees because SBUA continues to dedicate a team of skilled staff and consultants to attend numerous time intensive workshops related to TEF and otherwise, analyze and research complex issues, and draft and submit multiple comments on the TEF. SBUA’s work entailed drafting and submitting</p>	

	CPUC Discussion
<p>substantive pleadings as shown in the docket, including with responses to ALJ rulings requesting shareholder input and comment on the proposed decision. As discussed above, the Commission cited to and considered SBUA’s positions in the Decisions, and SBUA’s advocacy was to the benefit of small business and other ratepayers.</p> <p>For these reasons, the Commission should find that SBUA’s efforts have been valuable and the request for costs reasonable.</p>	
<p><b>b. Reasonableness of hours claimed:</b> Given the complexity of the issues presented in examination of the TEF and Staff Proposal addressed in D.22-11-040, and given the extensive time required to participate in workshops, comments, and analysis of these matters extending for over two years, SBUA’s hours, including for team of highly experienced attorneys and experts, are reasonable to address key issues of importance to small businesses in this proceeding. . SBUA seeks recovery for approximately 278 hours of attorney and expert time, as detailed in the attached time sheets, excluding hours associated with the compensation billing.</p> <p>SBUA Litigation Supervisor, Jennifer Weberski, coordinated SBUA’s engagement during the proceeding. Ms. Weberski has over 24 years of utility regulatory experience. Based on SBUA’s participation in related rate proceedings and decades of pertinent legal experience, Ms. Weberski efficiently participated in this docket and spent a reasonable amount of time on the proceeding. Attorneys Luke May and Itzel Hayward also assisted in the proceeding on a more limited basis either through attendance at workshops and/or meetings or in the drafting and editing of comments.</p> <p>SBUA’s experts John Wilson has over 28 years of experience with regard to utility regulation. Mr. Wilson focused his efforts on providing robust comments on the TEF. As President of Resource Insight, Inc. with 40 years of experience, SBUA expert Paul Chernick provided oversight and input into the comments submitted. In addition, to Mr. Wilson and Mr. Chernick, James Harvey assisted with a few hours of background research related to CAISO, EV infrastructure, and the expert comments.</p> <p>In addition, SBUA’s expert Ted Howard, who was responsible for participating in the Vehicle-Grid Integration (VGI) Working Groups in 2020, continued to assist with VGI matters and workshops in 2021. SBUA submits that it is reasonable to include time on ongoing workshops and matters with this compensation request.</p> <p>SBUA’s President and General Counsel, James Birkelund, continued to participate in this proceeding analyzing party comments, providing</p>	

	CPUC Discussion
<p>strategic direction, managing work efforts, and overseeing and coordinating the legal team.</p> <p>SBUA took care to coordinate its efforts between professionals and given magnitude and importance of the rulemaking as a whole, SBUA’s hours represent an appropriate level of engagement and effort to continue our participation in the proceeding, including attending a number of workshops, analyzing issues of importance to the TEF, drafting numerous written comments, and engaging in other activities leading up to the Decision. Certain time that SBUA is submitting with this claim was spent on activities not uniquely tied to any particular decision (e.g., scorecard webinars and comments), and accordingly SBUA has reviewed timesheets for attorneys and experts to ensure no hours submitted here were previously submitted in our prior compensation claims on other decisions in A.18-12-006.</p>	
<p><b>c. Allocation of hours by issue:</b> Each issue was approached from the perspective and advocacy for small business customers.</p> <p><u>Issue 1 – Workshops, Meetings</u> = 51.2 hours or 18%</p> <p><u>Issue 2 – Rate Design Issues</u> = 56.2 hours or 20%</p> <p><u>Issue 3 – Cost Effectiveness Issues</u> = 38.5 hours or 14%</p> <p><u>Issue 4 – ME&amp;O Issues</u> = 51.75 hours or 19%</p> <p><u>Issue 5 – MDHD Issues</u> = 52.05 hours or 19%</p> <p><u>Issue 6 – Other Issues</u> (such as, ongoing VGI matters, background CAISO research) = 23.55 hours or 8%</p> <p><u>Issue 7 – Procedural Participation</u> = 4.9 hours or 2%</p>	

**B. Specific Claim:\***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Jennifer Weberski	2020	39.35	\$470	D.22-01-012	\$18,494.50			

Jennifer Weberski	2022	5.5	\$655	D.22-01-012, plus a 5% step increase per Res. ALJ-393	\$3,602.50			
Itzel Hayward	2020	3.7	\$495	D.22-08-046	\$1,831.50			
Itzel Hayward	2021	7.3	\$610	D.22-12-051	\$4,453.00			
Itzel Hayward	2022	4.3	\$610	As above.	\$2,623.00			
Luke May	2021	4	\$425	Res. ALJ-393 and Market Rate Study; <i>see</i> Comment 1 below	\$1,700.00			
Luke May	2022	7	\$425	As above.	\$2,975.00			
Paul Chernick	2019	3	\$400	D.20-06-015	\$1,200.00			
Paul Chernick	2020	59	\$430	D.22-01-012	\$25,370.00			
Paul Chernick	2022	4	\$490	D.22-09-024, plus a 5% step increase per Res. ALJ-393	\$1,960.00			
John Wilson	2020	113.25	\$360	D.22-01-012	\$40,860.00			
John Wilson	2022	13.50	\$400	D.22-08-046, plus a 5% step increase per Res. ALJ-393	\$5,400.00			
James Harvey	2019	3.2	\$190	Res. ALJ-387; <i>see</i> Comment 4	\$608.00			
Ted Howard	2020	0.4	\$405	D.22-12-051	\$162.00			
Ted Howard	2021	12.55	\$425	D.22-12-051	\$5,333.75			
James Birkelund	2020	3.8	\$510	D.21-06-011	\$1,938.00			
James Birkelund	2021	3.4	\$650	D.22-08-046	\$2,210.00			

James Birkelund	2022	16.75	\$680	D.22-08-046, plus a 5% step increase per Res. ALJ-393	\$11,390.00			
<b>Subtotal: \$ 132,111.25</b>					<b>Subtotal: \$</b>			
<b>OTHER FEES</b>								
<b>Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):</b>								
<b>Item</b>	<b>Year</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Basis for Rate*</b>	<b>Total \$</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Total \$</b>
<b>Subtotal: \$</b>					<b>Subtotal: \$</b>			
<b>INTERVENOR COMPENSATION CLAIM PREPARATION **</b>								
<b>Item</b>	<b>Year</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Basis for Rate*</b>	<b>Total \$</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Total \$</b>
Jennifer Weberski	2022	3	\$327.5	50% of 2022 Rate	\$982.50			
Jennifer Weberski	2023	21	\$327.5	50% of 2022 Rate; see Comment 2	\$6,877.50			
<b>Subtotal: \$7,860.00</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: \$139,971.25</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>
James M. Birkelund	March 2000	206328	No
Jennifer L. Weberski	Admitted (Connecticut, 1997; Washington D.C., 2003)	Conn. Bar No. 414546; D.C. Bar No. 481853. Res. ALJ-393, p. 6 (attorneys eligible for compensation can be licensed in any jurisdiction within the United States).	No
Itzel Berrio Hayward	December 1997	192385	No
Luke L. May	Admitted to Oregon State Bar in 2012	OR Bar No. 121174. Res. ALJ-393.	No

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

<b>Attachment or Comment #</b>	<b>Description/Comment</b>
Attachment 1	Certificate of Service
Attachment 2	Timesheets of SBUA Attorneys and Resource Insight, Inc. Experts
Comment 1	<u>2021 Hourly Rate for Luke May</u> SBUA seeks an hourly rate for the work of attorney Luke May of \$425 for his work in 2021 based on Resolution ALJ-393. SBUA sought this same rate in our compensation request filed in the instant proceeding (A>18-12-006) on February 17, 2022. Pending a decision on that earlier claim, the same 2021 hourly rate will apply here. SBUA requests that the Commission refer to and rely on this earlier showing to support Mr. May’s 2021 rate.
Comment 2	For time spent in 2023 on this compensation claim, SBUA is requesting the Commission apply the 2022 hourly rate for attorney Jennifer Weberski; however, SBUA reserves the right and intends to request new 2023 rates for Ms. Weberski in future compensation claims.
Comment 3	For 2022 hourly rates, SBUA requests that the Commission apply any approved annual escalation in rates to SBUA’s attorneys and experts. Resolution ALJ-393 provides for an annual rate escalator that is

<sup>3</sup> This information may be obtained through the State Bar of California’s website at

Attachment or Comment #	Description/Comment
	automatically applicable ( <i>see</i> p. 4); however, at the time of this filing, SBUA is not aware of the Commission having published or ruled on the escalator for 2022
Comment 4	SBUA seeks an hourly rate for the work of expert James Harvey of \$190 for his work in 2019. SBUA made an identical request in A.10-07-009, <i>et al.</i> Pending a decision on that compensation claim, the same 2019 rate will apply here. SBUA requests that the Commission refer to and rely on. the showing in this other docket to support Mr. Harvey’s 2019.

**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>	
---	--

If so:

Party	Reason for Opposition	CPUC Discussion

<b>B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?</b>	
--	--

If not:

Party	Comment	CPUC Discussion

**(Green items to be completed by Intervenor)**

**FINDINGS OF FACT**

1. **SMALL BUSINESS UTILITY ADVOCATES** [has/has not] made a substantial contribution to D.22-11-040.
2. The requested hourly rates for **SMALL BUSINESS UTILITY ADVOCATES** 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. **SMALL BUSINESS UTILITY ADVOCATES** is awarded \$\_\_\_\_\_.
2. Within 30 days of the effective date of this decision, \_\_\_\_\_ shall pay **SMALL BUSINESS UTILITY ADVOCATES** the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay **SMALL BUSINESS UTILITY ADVOCATES** 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 **SMALL BUSINESS UTILITY ADVOCATES** request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.

This decision is effective today.

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

**APPENDIX**

**Compensation Decision Summary Information**

<b>Compensation Decision:</b>		<b>Modifies Decision?</b>	
<b>Contribution Decision(s):</b>	D.22-11-040		
<b>Proceeding(s):</b>	R.18-12-006		
<b>Author:</b>			
<b>Payer(s):</b>			

**Intervenor Information**

<b>Intervenor</b>	<b>Date Claim Filed</b>	<b>Amount Requested</b>	<b>Amount Awarded</b>	<b>Multiplier?</b>	<b>Reason Change/Disallowance</b>
SMALL BUSINESS UTILITY ADVOCATES	1/20/23	\$139,971.25		N/A	

**Hourly Fee Information**

<b>First Name</b>	<b>Last Name</b>	<b>Attorney, Expert, or Advocate</b>	<b>Hourly Fee Requested</b>	<b>Year Hourly Fee Requested</b>	<b>Hourly Fee Adopted</b>
Jennifer	Weberski	Attorney	\$470	2020	
Jennifer	Weberski	Attorney	\$625	2021	
Jennifer	Weberski	Attorney	\$655	2022	
Itzel	Hayward	Attorney	\$495	2020	
Itzel	Hayward	Attorney	\$610	2021	
Itzel	Hayward	Attorney	\$610	2022	
Paul	Chernick	Expert	\$400	2019	
Paul	Chernick	Expert	\$430	2020	
Paul	Chernick	Expert	\$490	2022	
John	Wilson	Expert	\$360	2020	
John	Wilson	Expert	\$400	2022	
James	Harvey	Expert	\$190	2019	

Revised August 2021

Ted	Howard	Expert	\$405	2020	
Ted	Howard	Expert	\$425	2021	
James	Birkelund	General Counsel	\$510	2020	
James	Birkelund	General Counsel	\$650	2021	
James	Birkelund	General Counsel	\$680	2022	
Luke	May	Attorney	\$425	2021	
Luke	May	Attorney	\$425	2022	

**(END OF APPENDIX)**

## **ATTACHMENT 2**

Timesheets of SBUA Attorneys and  
RII Experts

**Rulemaking 18-12-006 - Request for Intervenor Compensation  
Attachment 2. Time Sheet Records with Allocation of Hours Contribution to D.22-11-040**

**Time Sheet Entries for Jennifer Weberski**

**Issue Identification**

- 1 Workshops, Meetings
- 2 Rate Design
- 3 Cost Effectiveness/Allocation
- 4 ME&O
- 5 Rebates
- 6 Other Issues (e.g., ongoing VGI, background CAISO research)
- 7 Procedural Participation

<u>Date</u>	<u>Task</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>	<u>Issue 5</u>	<u>Issue 6</u>	<u>Issue 7</u>
3/4/20	Internal discussion with J. Birkelund							0.10
3/4/20	Drafting TEF comments		2.00	0.25				
3/5/20	Edit TEF comments -chap. 2-5		0.75	1.00				
3/6/20	Finalize TEF comments for filing		1.00					
3/7/20	Review TEF party comments		2.00	1.00	0.75			
3/8/20	Continue review of party comments			0.50	2.00			
3/9/20	Finish review of opening comments		2.00	0.75				
4/22/20	Discuss filing dates with RII							0.25
4/22/20	Draft and edit reply comments on TEF		1.25					
4/24/20	Draft and edit reply comments on TEF			2.00				
4/27/20	Finalize TEF reply comments		1.00					
4/27/20	Provide reply comments to RII							0.50
4/28/20	Review reply comments from parties		1.00	0.75				
4/28/20	Review ALJ ruling on motions for party status							0.25
4/29/20	Continue review of party reply comments		1.25	1.00				
4/30/20	Continue review of party reply comments					2.50		
5/26/20	Review request for extension of comments							0.25
6/2/20	Review agenda for 6/8 & 6/9 workshops	0.25						
8/4/20	Review ALJ ruling on schedule change							0.25
8/5/20	Draft of TEF (9,10,10) comments					1.50		
8/20/20	Edit TEF comments -ME&O					1.25		
8/21/20	Finalize TEF comments -ME&O					1.5		
8/23/20	Review party comments -ME&O					2.25		
8/24/20	Finish review of party comments			1.00	1.00			
8/27/20	Reply comments equity/ME&O				2.00			
9/3/20	Edit and finalzie reply comments				2.25			
10/14/22	Review PD on TEF issues		0.75	0.75	0.75	0.75		
11/3/22	Edit and finalize comments on PD		1	0.5	0.5	0.5		
	<b>Totals:</b>	<b>0.25</b>	<b>14.00</b>	<b>9.50</b>	<b>15.75</b>	<b>3.75</b>	<b>0.00</b>	<b>1.60</b>

**COMPENSATION HOURS BILLED AT 50%**

12/15/22	Draft compensation claim	3.0
1/12/23	Draft compensation claim	2.5
1/17/23	Draft compensation claim	4.0
1/18/23	Draft compensation claim	5.0
1/19/23	Draft compensation claim	6.0
1/20/23	Finalize claim	3.5
	<b>Total:</b>	<b>24.0</b>



**Rulemaking 18-12-006 - Request for Intervenor Compensation  
Attachment 2. Time Sheet Records with Allocation of Hours Contribution to D.22-11-040**

**Time Sheet Entries for John Wilson**

**Issue Identification**

- 1 Workshops, Meetings
- 2 Rate Design
- 3 Cost Effectiveness/Allocation
- 4 ME&O
- 5 Rebates
- 6 Other Issues (e.g., ongoing VGI, background CAISO research)
- 7 Procedural Participation

<u>Date</u>	<u>Task</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>	<u>Issue 5</u>	<u>Issue 6</u>	<u>Issue 7</u>
4/6/20	Review opening TEF comments		1	1				
4/7/20	Review opening TEF comments		1.00	2.00	1.00			
4/8/20	Draft reply TEF comments		4.00					
4/9/20	Draft reply TEF comments			6.00				
4/13/20	Draft reply TEF comments		0.50					
4/14/20	Draft reply TEF comments		1.00					
4/15/20	Draft reply TEF comments		2.00					
4/16/20	Ananalysis of SDG&E PYD data for reply TEF comments		6.50					
4/17/20	Draft reply TEF comments			1.00				
4/20/20	Workshop on TEF Chapter 4 IOU role	4.00						
4/21/20	Revise reply TEF comments to reflect Workshop issues		4.00					
4/22/20	Revise reply TEF comments to reflect Workshop issues		6.00					
4/23/20	Revise reply TEF comments			2.00				
5/1/20	Review TEF reply comments			2.00				
5/2/20	Draft TEF comments, Section 3.4					2.00		
6/8/20	Scorecard Webinar	4.00						
6/9/20	Scorecard Webinar	2.00						
6/15/20	Scorecard reply comments, Sections 3.1, 4, 5.1, 5.3, 5.5					4.75		
6/16/20	Scorecard reply comments, Sections 3.1, 4, 5.1, 5.3, 5.5					8		
6/17/20	Scorecard reply comments, Sections 3.1, 4, 5.1, 5.3, 5.5					2.5		
6/18/20	Scorecard reply comments, Sections 3.1, 4, 5.1, 5.3, 5.5					1		
8/3/20	Planning, equity, and ME&O (Section 11.2) comments					0.5		
8/5/20	Planning, equity, and ME&O (Section 11.2) comments					4.0		
8/6/20	Planning, equity, and ME&O (Section 11.2) comments					4.0		
8/20/20	TEF comments equity, ME&O					0.5		
8/27/20	Reply comments equity/ME&O					3.0		
9/8/20	Rates and cost allocation comments Section 9, 10, 11				5.0			
9/9/20	Rates and cost allocation comments				5.0			
9/11/20	Rates and cost allocation comments				0.5			
9/21/20	TEF §9, 10, 12. - cost allocation and rates				0.50			
9/22/20	TEF §9, 10, 12. - cost allocation and rates				9.00			
9/23/20	TEF §9, 10, 12 - cost allocation and rates				9.50			
9/24/20	TEF §9, 10, 12 - cost allocation and rates				1.00			
9/28/20	Review comments				1.50			
3/22/22	TEF staff report webinar	1.00						
4/7/22	Prep for call with ED staff; draft comments on revised TEF		2.00	2.00	2.00	3.00		
4/21/22	Finalize comments on revised staff proposal				1.00			
5/3/22	Review comments on staff revised proposal					2.00		
10/15/22	Review PD						0.50	
	<b>Totals:</b>	<b>11.00</b>	<b>28.00</b>	<b>16.00</b>	<b>36.00</b>	<b>35.25</b>	<b>0.50</b>	<b>0</b>

**Rulemaking 18-12-006 - Request for Intervenor Compensation  
Attachment 2. Time Sheet Records with Allocation of Hours Contribution to D.22-11-040**

**Time Sheet Entries for Paul Chernick**

**Issue Identification**

- 1 Workshops, Meetings
- 2 Rate Design
- 3 Cost Effectiveness/Allocation
- 4 ME&O
- 5 Rebates
- 6 Other Issues (e.g., ongoing VGI, background CAISO research)
- 7 Procedural Participation

<u>Date</u>	<u>Task</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>	<u>Issue 5</u>	<u>Issue 6</u>	<u>Issue 7</u>
4/9/19	Analysis of SP15 LMP to determine monthly pricing periods						3.0	
3/3/20	Review Staff TEF proposal Sections 2, 3.1, 3.2, 3.3, 4, and 5		1.00	1.00	1.00			
3/4/20	Review TEF report and draft comments on Secs 2, 3.1, 3.2, 3.3, 4 and 5		3.00	3.00	1.00			
3/5/20	draft comments on Secs 2, 3.1, 3.2, 3.3, 4 and 5			1.00	1.00			
3/6/20	draft comments on Secs 2, 3.1, 3.2, 3.3, 4 and 5		2.00					
3/23/20	TEF workshop	6.50						
4/3/20	review party comments		1.00					
4/7/20	IOU role in EV		0.20					
4/16/20	TEF reply comments, Secs 2, 3.1, 3.2, 3.3, 4 and 5		1.00					
4/17/20	TEF Secs 2, 3.1, 3.2, 3.3, 4 and 5 reply comments			2.00	2.00			
4/22/20	edits of reply, TEF Secs 2, 3.1, 3.2, 3.3, 4 and 5; review filings in related dockets		1.00	1.00				
4/24/20	edits of reply, TEF Secs 2, 3.1, 3.2, 3.3, 4 and 5			0.50				
4/29/20	review other party initial comments		1.00		1.00			
5/8/20	section 3.4 of the TEF scorecard Opening comments				2.00			
6/5/20	Issues for TEF Scorecard Workshop				1.30			
6/8/20	TEF scorecard workshop				5.00			
6/9/20	TEF scorecard workshop				3.00			
6/18/20	TEF Scorecard reply comments				3.00			
6/19/20	TEF Scorecard reply comments				2.00			
9/8/20	TEF §9, 10, 12--rebates						3.0	
9/9/20	TEF §9						4.0	
9/9/20	TEF §9, 10, 12--rebates						2.0	
9/10/20	TEF §9, 10, 12--rebates						1.5	
3/22/22	Notice of Webinar on the Transportation Electrification Framework (TEF) - Revised Staff Proposal (R.18-12-006)	1.00						
3/25/22	TE meetings with parties; review issues				1.00			
4/7/22	Prepare for ED discussion; video conference	2.00						
	<b>Totals:</b>	<b>9.5</b>	<b>10.20</b>	<b>8.50</b>	<b>24.30</b>	<b>10.50</b>	<b>3.00</b>	<b>0</b>

**Rulemaking 18-12-006 - Request for Intervenor Compensation  
Attachment 2. Time Sheet Records with Allocation of Hours Contribution to D.22-11-040**

**Time Sheet Entries for Ted Howard**

**Issue Identification**

- 1 Workshops, Meetings
- 2 Rate Design
- 3 Cost Effectiveness/Allocation
- 4 ME&O
- 5 Rebates
- 6 Other Issues (e.g., ongoing VGI, background CAISO research)
- 7 Procedural Participation

<u>Date</u>	<u>Task</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>	<u>Issue 5</u>	<u>Issue 6</u>	<u>Issue 7</u>
12/30/20	Strategy w/ J. Birkelund re ongoing participation in R.18-12-006, VGI issues						0.4	
1/11/21	Memo to SBUA Counsel re comments for 1.29.21 CPUC VGI workshop	0.5						
1/13/21	Critically review CPUC ED questions for VGI policy issues impacting small bus. customers						0.5	
1/14/21	Analysis of NTG ratios for small bus & DAC customers as estimate for VGI ALM incentives	0.5						
1/14/21	Develop written comments for ED Q re definition of VGI Auto Load Mgmt (ALM)	0.4						
1/14/21	Develop written comments for ED Q re eval criteria use cases for VGI Auto Load Mgmt (ALM), recommending incentives for sm bus, DAC/HTR	0.5						
1/14/21	Develop written comments for ED Q re savings of dist grid deferral from VGI Auto Load Mgmt (ALM), recommending CPUC determine NTG ratios	0.5						
1/14/21	Develop written comments for ED Q re costs for VGI Auto Load Mgmt (ALM), incl. AHJ issues	0.4						
1/14/21	Develop written comments for ED Q re guidelines for perf. Rqmts for VGI Auto Load Mgmt (ALM),	0.4						
1/14/21	Develop written comments for ED Q re VGI Auto Load Mgmt (ALM) policies for med & heavy duty Evs	0.2						
1/14/21	Develop written comments for ED Q re VGI Auto Load Mgmt (ALM) policies for Env. Social Justice	0.3						
1/14/21	Develop written comments for ED Q re VGI Auto Load Mgmt (ALM) policies for Customer Experience	0.2						
1/14/21	Develop written comments for ED Q re other VGI policies, costs and benefits	0.4						
1/15/21	Crrspnd & confer w/ SBUA Counsel re Comments for CPUC ED VGI Auto Load Mgmt (ALM) 1.29.21 workshop	0.5						
1/15/21	Final review & changes to Comments for VGI ALM workshop	0.5						
1/16/21	Crrspnd and direction from SBUA Counsel re VGI ALM Comments	0.1						
1/27/21	As above.	0.2						
1/28/21	Prep for CPUC VGI ALM Workshop, incl. ED staff Qs & SBUA responses on behalf of sm bus interests & low rates	0.4						
1/29/21	Participated in CPUC VGI ALM Workshop (1:15-4:51 pm), incl. issues impacting sm bus ratepayers: ALM subsidy vs. sm bus rates; IOU charge for upgrading circuit if exceeding 20% of peak	3.6						
1/29/21	Follow-up from CPUC VGI ALM Workshop, incl. ALM benefits to sm bus ratepayers; subsidy vs. lower rates; IOU customer charge for upgrading circuit if addl load exceeds 20% of peak	0.5						
2/5/21	Confer w/ J. Birkelund re VGI strategies						0.2	
6/25/21	Confer w/ SBUA Counsel re VGI WG & SBUA involvement	0.3						
7/28/21	Written input to SBUA Counsel re VGI WG mtg for feedback on 2 IOU proposals	0.2						
8/10/21	Prep for IOU mtg re VGI Interim studies & Em Tech Prgms, incl. studies re VGI apps & cost effectiveness	0.3						
8/10/21	Participated in IOU mtg re VGI studies & Em Tech prgms (1-2:50 PM), incl strat for determining CE, & integr.VGI into DER CE analysis	1.85						
8/10/21	Completed IOU VGI post-mtg survey re eval of IOU proposals & strategies for VGI studies & prgrms	0.2						
8/11/21	Follow-up from IOU VGI mtg, incl. rec & strat for determining CE and integr VGI into DER CE analysis; impacts on sm bus & DAC/HTR						0.4	
8/12/21	Confer w/ SBUA Counsel & CPUC re IOU VGI studies & mtg.						0.3	
8/16/21	Crrspnd from SCE Case Admin VGI Stakeholder Survey feedback						0.2	
	<b>Totals:</b>	<b>12.95</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2.00</b>	<b>0</b>

**Rulemaking 18-12-006 - Request for Intervenor Compensation  
Attachment 2. Time Sheet Records with Allocation of Hours Contribution to D.22-11-040**

**Time Sheet Entries for Itzel Hayward**

**Issue Identification**

- 1 Workshops, Meetings
- 2 Rate Design
- 3 Cost Effectiveness/Allocation
- 4 ME&O
- 5 Rebates
- 6 Other Issues (e.g., ongoing VGI, background CAISO research)
- 7 Procedural Participation

<u>Date</u>	<u>Task</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>	<u>Issue 5</u>	<u>Issue 6</u>	<u>Issue 7</u>
9/10/20	Opening Comments to TEF section 9			1				
9/11/20	Opening Comments to TEF section 9			1.3				
9/25/20	Reply Comments to TEF sections 9, 10			1.1				
9/27/20	Email communications with J. Wilson re other parties' reply comments			0.3				
1/9/21	Review Public Notice and email JB re calendaring R1812006							0.2
1/11/21	Email T. Howard re attendance at 1/29 workshop R.18-12-006	0.2						
1/12/21	Work w T. Howard re preworkshop comments	0.4						
1/13/21	Work w T. Howard re preworkshop comments	0.1						
1/14/21	Work w T. Howard re preworkshop comments	0.1						
1/15/21	Finalize preworkshop comments in letter form to Ed Pike	1.1						
1/15/21	Review EV hearing ruling and discuss with JB							0.2
1/16/21	Email T. Howard re comments	0.1						
1/20/21	Review new ruling						0.3	
1/21/21	Review EV ruling and email John / Paul						0.2	
1/22/21	Review commission ruling and J. Wilson's response						0.3	
1/27/21	Internal emails re the same						0.4	
1/29/21	Review agenda for workshop	0.2						
1/29/21	Attend workshop	0.5						
3/12/21	Review agenda for 3/16 workshop	0.1						
4/27/21	Correspondence with JB re upcoming workshop	0.2						
4/29/21	Correspondents with experts re Joint IOU Uniform Load ICA Narrative						0.1	
6/5/21	Review PD						0.4	
6/7/21	Email RII and JW re PD						0.2	
6/30/21	Strategy emails w J. Weberski							0.2
7/1/21	review schedule							0.1
7/28/21	strategize re VGI working group / correspond with JB and TH						0.4	
8/1/21	review files re same						0.1	
8/5/21	Prep for, attend, and debrief meeting with PG&E	1						
8/12/21	strategize next steps						0.1	
11/17/21	review file / strategize next steps						0.1	
3/2/22	review ACR for comments on TEF				0.2			
3/3/22	Internal strategy emails re ACR for comments on TEF				0.2			
3/24/22	Review correspondence / filings				0.5			
4/6/22	meeting with JB							0.1
4/22/22	correspond with RII re comments to ACR / correspond with JW / prep comments				0.5	0.4		
4/25/22	finalize comments				0.4	0.4		
5/3/22	correspond with RII re reply comments / review opening comments	0.8			0.4	0.4		
	<b>Totals:</b>	<b>4.8</b>	<b>0</b>	<b>3.7</b>	<b>2.2</b>	<b>1.2</b>	<b>2.6</b>	<b>0.8</b>

**Rulemaking 18-12-006 - Request for Intervenor Compensation**  
**Attachment 2. Time Sheet Records with Allocation of Hours Contribution to D.22-11-040**

**Time Sheet Entries for James Harvey**

**Issue Identification**

- 1 Workshops, Meetings
- 2 Rate Design
- 3 Cost Effectiveness/Allocation
- 4 ME&O
- 5 Rebates
- 6 Other Issues (e.g., ongoing VGI, background CAISO research)
- 7 Procedural Participation

<u>Date</u>	<u>Task</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>	<u>Issue 5</u>	<u>Issue 6</u>	<u>Issue 7</u>
3/25/19	Background research; retrieving/cleaning CAISO data						1.2	
3/26/19	Background research; retrieving/cleaning CAISO data						1	
3/27/19	Background research; retrieving/cleaning CAISO data						0.5	
3/28/19	Background research; retrieving/cleaning CAISO data						0.5	
	<b>Totals:</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3.2</b>	<b>0</b>

**Rulemaking 18-12-006 - Request for Intervenor Compensation  
Attachment 2. Time Sheet Records with Allocation of Hours Contribution to D.22-11-040**

**Time Sheet Entries for James Birkelund**

**Issue Identification**

- 1 Workshops, Meetings
- 2 Rate Design
- 3 Cost Effectiveness/Allocation
- 4 ME&O
- 5 Rebates
- 6 Other Issues (e.g., ongoing VGI, background CAISO research)
- 7 Procedural Participation

<u>Date</u>	<u>Task</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>	<u>Issue 5</u>	<u>Issue 6</u>	<u>Issue 7</u>
9/24/20	Strategy call w San Diego Airport Parking (SDAP) re coordination on submetering efforts.						0.8	
9/24/20	Read SDAP and other cmmts on EV Submetering proposal						0.75	
9/24/20	Rsch small commercial customer interests re the same.						1.25	
9/25/20	Confer w Litigation Team re SBUA comments on TEF sections 9 and 10.				0.5			
9/28/20	Strategy cmmn w Litigation Team re submetering protocols.						0.5	
1/12/21	Read Request for Pre-Workshop Comments re Load Management/EV Energy Management System Definitions, Deployment Criteria, and Performance Requirements.	0.1						
1/12/21	Confer w litigation team re same.	0.2						
1/15/21	Attn to SBUA response to Commission's pre-workshop questions.	0.5						
1/21/21	Read joint reply of IOUs on pre-workshop comments	0.2						
1/21/21	Read other parties' comments on pre-workshop comments	0.6						
1/26/21	Read email from SoCalGas re Request – Information on existing or planned pilots related to VGI.						0.1	
4/26/21	Rev ED notice of CPUC Workshop on Advanced DER & Flexible Load Management.	0.2						
7/21/21	Read Cmmnr Rechtschaffen's Decision Setting Near-Term Priorities for TE.						0.5	
8/11/21	Strategy w T. Howard re SBUA positions on VGI Interim Studies and TE/VGI Emerging Tech program and SB barriers.						0.8	
11/12/21	Rev Extending Common Facility Costs TE Policy.						0.2	
2/25/22	Read Cmnr Ruling Adding Staff Proposal and inviting Cmmts.		0.2	0.1	0.1	0.1		
3/10/22	Confer w Litigation Team re upcoming cmmts.		0.1	0.1	0.05			
3/15/22	Rev Joint Utilities' response re stocktake to identify existing or planned pilots related to VGI.						0.5	
3/16/22	Skim VGI Annual Strategies Reports for 2021						0.75	
3/17/22	Rev PG&E's VGI Report and Motion to Accept Late Filing						0.25	
3/21/22	Read CCA's and party reponses to Request for Extension of Time for comments in response to ACR.						0.25	
3/25/22	Rev IOU's V2G AC Subgroup Update via email.						0.25	
3/29/22	Rev memo from L. May re WS in EV infrastructure; follow-up emails re EV charging equipment for 5 years is likely a huge barrier for small businesses.	0.25					0.5	
4/14/22	Strategy call w I. Hayward re SBUA cmmts.		0.25					
4/18/22	Rev IOUs crspsnd re updated stocktake of VGI activities						0.25	
4/19/22	Read Notice of Post-Workshop Comments re IOUs' Joint EV Service Energization.	0.25						
4/25/22	Rev parties' cmmts on ED staff proposal.		0.75					
4/25/22	Edits to SBUA cmmts on new ED staff proposal.		1					
4/26/22	Confer w I. Hayward re same.		0.25					
4/28/22	Read Nuvve Holding Corp request to late-file cmmts.							0.25
4/28/22	Read Jt Response of SDGE SCE and PGE Entering Stocktake into Record.						0.25	
4/28/22	Confer w I. Hayward re SBUA reply cmmts.		0.25					
5/8/22	Confer w Litigation Team re other parities' cmmts on Staff Proposal		0.25					
5/9/22	As above.		0.25					
5/16/22	Read party Reply Comments on Staff's TEF Proposal.					0.75		
6/30/22	Rev PD adopting Plug-In Electric Vehicle Submetering Protocol and Electric Vehicle Supply Equipment Communication Protocols						0.25	
7/9/22	Rev Annual TE Evaluation 2021 and SB 350 reports.						0.5	
7/20/22	Read party cmmts on PD re EV Submetering Protocol						0.5	
7/21/22	Rev PG&E proposal re Small Business Direct Install Pilot re EV.						0.75	

<u>Date</u>	<u>Task</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>	<u>Issue 5</u>	<u>Issue 6</u>	<u>Issue 7</u>
7/22/22	Strategy emails w Litigation Team re SBUA positions on PG&E pilot.						0.25	
7/27/22	Skim reply cmmts on PD.						0.25	
8/15/22	Read ChargePoint and Enel X Rule 16.5 Request to Correct Errors in D.22-08-024.							0.25
9/15/22	Skim SCE Annual VGI Strategies Report for 2022.						0.25	
9/19/22	Skim other IOUs' VGI Strategies Semi-Annual Reports.						0.25	
9/26/22	Read IOUs' V2G AC Subgroup Update						0.25	
10/15/22	Read PD on TE Policy and Investment.						0.5	
10/16/22	Strategy w experts re next steps in case.							0.25
10/19/22	Strategy call w J. Weberski re cmmts on PD.							0.25
10/26/22	Call w J. Weberski re cmmts on PD.		0.1	0.1	0.05			
10/27/22	Read NRDC mt for Ext of Time to File Comments on Proposed Decision.							0.25
10/27/22	Read ALJ denial of request to extend the deadline to file comments.							0.25
11/1/22	Read SCE email re Further Suspension of IOU VGI Evaluation.							0.25
11/2/22	Confer w J. Weberski re cmmts on PD.		0.1	0.1	0.05			
11/2/22	Rev GPI op cmmts on PD re TEF.				0.25			
11/3/22	Rev Motion for Party Status of FreeWire Technologies, Inc.							0.25
11/3/22	Attn to SBUA cmmt on PD re TEF		0.1	0.1	0.05			
11/4/22	Rev parties' op cmmts on PD re TEF.		0.2	0.2	0.2	0.15		
11/8/22	Rev parties' reply cmmts on PD re TEF		0.2	0.1	0.1	0.1		
11/16/22	Rev IOUs' mt to extend deadlines for responses or protests to ALs pertaining to submetering implementation							0.25
11/17/22	Read ALJ ruling granting 2-week ext to cmmt on ALs.							0.25
11/18/22	Read Electric Vehicle Association cmmts on PD.					0.25		
	<b>Totals:</b>	<b>2.3</b>	<b>4</b>	<b>0.8</b>	<b>1.35</b>	<b>1.35</b>	<b>11.65</b>	<b>2.5</b>



**Rulemaking 18-12-006 - Request for Intervenor Compensation  
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**Time Sheet Entries for Luke May**

**Issue Identification**

- 1 Workshops, Meetings
- 2 Rate Design
- 3 Cost Effectiveness/Allocation
- 4 ME&O
- 5 Rebates
- 6 Other Issues (e.g., ongoing VGI, background CAISO research)
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<b><u>Date</u></b>	<b><u>Task</u></b>	<b><u>Issue 1</u></b>	<b><u>Issue 2</u></b>	<b><u>Issue 3</u></b>	<b><u>Issue 4</u></b>	<b><u>Issue 5</u></b>	<b><u>Issue 6</u></b>	<b><u>Issue 7</u></b>
7/15/2021	Develop notes on strategy and next steps						0.6	
10/13/2021	Transportation electrification En Banc: attended meeting and took notes	3.3						
10/13/2021	Update to J. Birkelund & J. Weberski re strategy notes from meeting	0.1						
3/28/2022	Attend joint utilities' workshop on energization timelines for the utilities' electric vehicle infrastructure tariffs	7						
	<b>Total:</b>	<b>10.4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.6</b>	<b>0</b>