



STATE OF CALIFORNIA

GAVIN NEWSOM, Governor

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

FILED

06/27/25

12:28 PM

A1509010

June 27, 2025

Agenda ID #23595
Ratesetting

TO PARTIES OF RECORD IN APPLICATION 15-09-010:

This is the proposed decision of Administrative Law Judge Ava N. Tran. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's August 14, 2025 Business Meeting. To confirm when the item will be heard, please *see* the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties to the proceeding may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure. Electronic copies of comments should also be sent to the Intervenor Compensation Program at icompcoordinator@cpuc.ca.gov.

/s/ AVA TRAN for

Michelle Cooke

Chief Administrative Law Judge

MLC:jnf

Attachment

Decision **PROPOSED DECISION OF ALJ TRAN (Mailed 6/27/2025)****BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Application of San Diego Gas & Electric Company (U902E) for Authorization to Recover Costs Related to the 2007 Southern California Wildfires Recorded in the Wildfire Expense Memorandum Account (WEMA).

Application 15-09-010

**DECISION GRANTING COMPENSATION TO
THE PROTECT OUR COMMUNITIES FOUNDATION FOR
SUBSTANTIAL CONTRIBUTION TO DECISION 21-12-064**

Intervenor: The Protect Our Communities Foundation (PCF)	For contribution to Decision (D.) 21-12-064
Claimed: \$33,786.50	Awarded: \$16,540.50
Assigned Commissioner: Alice Reynolds	Assigned ALJ: Ava Tran ¹

PART I: PROCEDURAL ISSUES

A. Brief description of Decision: ²	D.21-12-064 granted rehearing of Protect Our Communities Foundation's (PCF) application for rehearing of D.21-02-027, "for the purposes of applying the correct legal standard and determining a reasonable award." ³
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¹ This proceeding was reassigned to ALJ Ava Tran on March 22, 2024.

² The description provided by the intervenor in this section has been changed to more accurately summarize the outcomes of D.21-12-064.

³ D.21-12-064 at 2.

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812⁴:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	2/22/2016	Verified
2. Other specified date for NOI:	n/a	
3. Date NOI filed:	3/22/2016	Verified
4. Was the NOI timely filed?		Yes
Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	R.13-12-010	Verified
6. Date of ALJ ruling:	September 26, 2014	Verified
7. Based on another CPUC determination (specify):	n/a	
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	R.13-12-010	Verified
10. Date of ALJ ruling:	September 26, 2014	Verified
11. Based on another CPUC determination (specify):	n/a	
12. Has the Intervenor demonstrated significant financial hardship?		Yes

⁴ All statutory references are to California Public Utilities Code unless indicated otherwise.

	Intervenor	CPUC Verification
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.21-12-064, Order Vacating Decision and Granting Rehearing of Decision 21-02-027	Verified
14. Date of issuance of Final Order or Decision:	12/20/2021	Verified
15. File date of compensation request:	2/17/2022	February 18, 2022. On December 6, 2024, PCF filed a supplement to the compensation request (Supplement) to document attorney's fees.
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
B.5-12	<p>Participation in this proceeding posed a substantial financial hardship for PCF because the economic interest of PCF's constituents and supporters is small in comparison to the costs of PCF's effective participation. <i>See</i> Pub. Util. Code § 1802(h). PCF represents the interests of a specific constituency: San Diego area residential and small business ratepayers, including ratepayers in smaller communities whose interests are often not adequately represented in Commission proceedings. PCF represents the interests of this constituency and PCF's supporters within this constituency. PCF's constituents and supporters are SDG&E ratepayers.</p> <p>SDG&E sought to recover \$379 million from ratepayers in this proceeding. PCF's goal in this proceeding was to make a substantial contribution that would prevent an increase in rates for PCF's constituents and supporters. While the total sum that SDG&E sought to recover was large, for any individual PCF constituent or supporter the costs of participating in this proceeding individually would have far outweighed the individual ratepayer impacts of the proposed rate increases.</p>	Noted

#	Intervenor's Comment(s)	CPUC Discussion
	For a summary of PCF's previous requests for intervenor compensation in this proceeding and the circumstances leading to the present request for intervenor compensation, please <i>see</i> the cover letter preceding this form.	

PART II: SUBSTANTIAL CONTRIBUTION

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

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>1. PCF substantially contributed to D.21-12-064's clarification of the legal standard for intervenor compensation related to judicial review of Commission decisions.</p> <p>PCF filed an application for rehearing of D.21-02-027, the Commission's Decision Denying Compensation Request of Protect Our Communities Foundation, on March 19, 2021. In its application, PCF asserted that D.21-02-027 contradicted the language and intent of the intervenor compensation statutes. Specifically, PCF argued that the language of Public Utilities Code section 1802(j) does not require the Court to adopt and incorporate all of the arguments PCF raised in its briefs for PCF to be entitled to compensation for its efforts related to judicial review of D.17-11-033.</p>	A.15-09-010, The Protect Our Communities Foundation Application for Rehearing of D.21-02-027 (Mar. 19, 2021) at pp. 15-18.	Verified to the extent that PCF's application for rehearing prompted the Commission to review its approach to intervenor compensation and to establish the standard and framework for evaluating claims related to judicial review proceedings.
2. PCF also argued that its arguments before the U.S.	A.15-09-010, The Protect Our	This argument did not contribute to D.21-12-064.

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>Supreme Court related to California’s recent legislative efforts merited compensation, even though the legislative efforts post-dated D.17-11-033, because PCF’s arguments were made in defense of D.17-11-033 and addressed the Supreme Court’s criteria for granting review.</p>	<p>Communities Foundation Application for Rehearing of D.21-02-027 (Mar. 19, 2021) at pp. 14-15.</p>	<p>D.21-12-064 addressed the foundational issue of the legal standard for determining contribution and a framework for resolving compensation claims related to judicial review proceedings. PCF’s contributions to D.17-11-033 were not at issue in D.21-12-064. (<i>See</i> D.21-12-064 at 9-10.) The Commission addressed and resolved PCF’s claim of contribution to D.17-11-033, at the judicial review stage, in D.25-01-021.</p>
<p>On December 16, 2021, the Commission issued D.21-12-064, Order Vacating Decision and Granting Rehearing of Decision 21-02-027. D.21-12-064 concluded that D.21-02-027 applied the wrong legal standard for evaluating intervenor compensation related to judicial review of Commission decisions. D.21-12-064 specifically concluded that Public Utilities Code section 1802(j) does not require the Court to adopt a party’s arguments for those arguments to merit compensation.</p>	<p>D.21-12-064 at p. 8 (“PCF argues that the Decision errs because the plain language of section 1802(j) defining ‘substantial contribution’ does not require the Court to adopt and incorporate PCF’s arguments. . . . PCF’s contention has merit. . . . [T]he substantial contribution test in terms of an intervenor’s judicial review efforts looks at whether the intervenor made a substantial contribution to a Commission decision. The Decision errs by anchoring the assessment of PCF’s substantial contribution to whether the U.S.</p>	<p><i>See</i> Part II.A[1] CPUC Discussion.</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
	Supreme Court relied on PCF's brief when it denied SDG&E's writ.").	
<p>Further, D.21-12-064 stated that, in defending its substantial contribution to a Commission decision in court, an intervenor "must participate on the issues as framed by [the party challenging the decision]," D.21-12-064 at p. 6 (quoting D.05-01-059), even if those issues were not exactly the same as those litigated before the Commission. As D.12-21-064 held, the key factor in this context is whether the work before the court was necessary to and helped to defend the Commission decision. This conclusion relates to PCF's arguments that it is entitled to compensation for briefing issues relevant to the criteria the Supreme Court evaluates in determining whether to grant review.</p>	<p>D.21-12-064 at pp. 6, 9-10 ("[T]he Commission should determine whether . . . , in the Commission's judgment, an intervenor's judicial review efforts helped defend its underlying substantial contribution.").</p>	<p><i>See</i> Part II.A[1] CPUC Discussion. As noted, D.21-12-064 did not determine whether PCF's brief contributed to the decision. Rather, D.21-12-064 focused on establishing the legal standard for determining contribution and set forth a framework for evaluating claims related to judicial review proceedings. (<i>See</i> D.21-12-064 at 9-10.) The Commission addressed and resolved PCF's claim of contribution in D.25-01-021.</p>
<p>2. In the alternative, PCF is entitled to compensation for fees it incurred to obtain compensation for its efforts before the US Supreme Court, where PCF defended its substantial contribution to D.17-11-033 by obtaining a denial of SDG&E's petition for review.</p> <p>PCF's December 4, 2019 request for intervenor compensation concerned PCF's efforts to obtain a denial of SDG&E's petition for</p>		<p>As already noted, D.21-12-064 did not consider whether PCF specific efforts before the reviewing court contributed to D.17-11-033. Instead, D.21-12-064 focused on establishing the legal standard for determining contribution and set forth a framework for evaluating claims related to judicial review proceedings. The Commission addressed the question of whether PCF's efforts before the reviewing</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>review of D.17-11-033 before the US Supreme Court. For the reasons stated in Part II.A of its December 4, 2019 request, PCF is entitled to intervenor compensation for these efforts because they were necessary to and helped to defend D.17-11-033 and PCF's substantial contribution to that decision. PCF anticipates that the Commission, in keeping with D.21-12-064, will reevaluate PCF's December 4, 2019 request for intervenor compensation.</p> <p>PCF's <i>current</i> request for intervenor compensation concerns solely PCF's efforts to <i>obtain compensation</i> for its efforts before the United States Supreme Court, beginning with the ALJs' December 11, 2020 Proposed Decision denying PCF's December 4, 2019 request for intervenor compensation. The current request thus does not overlap with PCF's December 4, 2019 request. However, to the extent that PCF's explanation of how its efforts before the Supreme Court were necessary to defend D.17-11-033 is a pre-requisite for PCF's current request, PCF incorporates its prior explanation—found at Part II.A of its December 4, 2019 request for intervenor compensation in this proceeding—by reference herein.</p> <p>PCF is entitled to intervenor compensation for its efforts to obtain compensation. PCF's request for intervenor</p>		<p>court contributed to D.17-11-033 in D.25-01-021.</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>compensation related to its work before the United States Supreme Court was denied in full in a Proposed Decision dated December 11, 2020. The Proposed Decision reasoned that, because the Supreme Court did not give reasons for its denial of SDG&E's petition, and because that Court only grants a small percentage of petitions for review, the denial could not be traced to PCF's efforts. The Proposed Decision also erroneously stated that there was no evidence that the Supreme Court requested that PCF file a response to the petition.</p> <p>PCF submitted comments on the Proposed Decision on December 30, 2020. Its comments explained that (1) the Proposed Decision deviated from previous awards of intervenor compensation related to summary denials; (2) the Supreme Court had requested that PCF file a response, and, because counsel for the Commission did not share a draft of its response prior to filing despite PCF's prior attempts to coordinate, PCF faced considerable risk of its arguments not being heard if it did not file a response; (3) the Proposed Decision's rationale effectively barred awards of intervenor compensation for opposing petitions for review; and (4) the Proposed Decision contradicted the language and intent of the intervenor compensation statutes.</p>	<p>A.15-09-010, Comments of the Protect Our Communities Foundation on Proposed Decision Denying Compensation Request of Protect Our Communities Foundation (Dec. 30, 2020), at pp. 7-8, 10- 12, 12-15.</p>	

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
On February 18, 2021, after the ALJs prepared a revised Proposed Decision, the Commission issued D.21-02-027, Decision Denying Compensation Request of Protect Our Communities Foundation. In that decision, the Commission awarded PCF \$14,612.40, approximately half of its requested fees. D.21-02-027 reasoned that, because of the Supreme Court’s summary denial and small grant rate, the Commission could not know “why [the Court] denied cert or the extent to which [it] relied on [PCF]’s brief.” Because the Court requested PCF’s participation, however, the Decision determined that a partial award was appropriate. D.21-02-027 also concluded that PCF’s argument that California’s recent legislative efforts made review of SDG&E’s petition unnecessary exceeded the scope of D.17-11-033 and was therefore ineligible for intervenor compensation.	D.21-02-027 at pp. 6-9.	
PCF filed an application for rehearing of D.21-02-027 on March 19, 2021. PCF’s application and arguments are described in greater detail in Row II.A.1, above.	A.15-09-010, The Protect Our Communities Foundation Application for Rehearing of D.21-02-027 (Mar. 19, 2021).	
On December 16, 2021, the Commission issued D.21-12-064, Order Vacating Decision and Granting Rehearing of Decision 21-02-027. D.21-12-064 is described at greater length in Row II.A.1, above.	D.21-12-064, Order Vacating Decision and Granting Rehearing of Decision 21-02-027 (Dec. 16, 2021).	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>PCF is entitled to compensation for reasonable fees incurred in litigating its entitlement to compensation. Section 1802 of the Public Utilities Code specifically authorizes compensation for such fees. <i>See</i> Pub. Util. Code § 1802(a) (defining “compensation” to “include[] the fees and costs of obtaining an award under this article”). In addition, there are strong public policy reasons to compensate attorneys for the time needed to obtain fees in public interest cases. As the California Supreme Court has acknowledged, “Citizens of ordinary means are unlikely to file, and competent private practitioners are unlikely to accept, public interest litigation, however meritorious, without some assurance of compensation that fairly covers the legal services required,” including the services required to obtain such compensation. <i>Serrano v. Unruh</i> (1982) 32 Cal.3d 621, 634-35. Failing to compensate parties for time spent obtaining fees would dilute existing awards, <i>see id.</i> at 634, quoting <i>Prandini v. National Tea Co.</i> (3d Cir. 1978) 585 F.2s 47, 53 (“If an attorney is required to expend time litigating his fee claim, yet may not be compensated for that time, the attorney’s effective rate for all the hours expended on the case will be correspondingly decreased.”), and undermine the public-</p>		

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
participation-promoting purpose of the intervenor compensation statutes.		

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

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocates Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?⁵	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	No	Verified
c. If so, provide name of other parties:		
d. Intervenor's claim of non-duplication: Although other parties had some similar positions to PCF in the proceedings before the United States Supreme Court, <i>see</i> PCF's request for intervenor compensation dated December 4, 2019, the present request for intervenor compensation concerns solely PCF's unique efforts to <i>obtain compensation</i> for its work before the United States Supreme Court. No other party submitted comments on the ALJs' December 11, 2020 Proposed Decision, ⁶ and no other party requested rehearing of D.21-02-027. Thus, PCF did not duplicate other parties' participation, and its interests were not adequately represented by other parties.		Verified

C. Additional Comments on Part II:

#	Intervenor's Comment	CPUC Discussion
A.1-2	PCF offers the justification presented in Row II.A.2 (concerning fees incurred to obtain intervenor compensation) as an alternative to the justification presented in Row II.A.1 (concerning PCF's substantial contribution to	This decision does not consider PCF's statements in Row II.A.2 as this decision addresses PCF's contributions to D.21-12-064, and not D.17-11-033.

⁵ The Office of Ratepayer Advocates was renamed the Public Advocates Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

⁶ The Sierra Club, Earthjustice, and the Environmental Defense Fund submitted a letter to Commissioners Batjer, Rechtschaffen, Guzman Aceves, and Shiroma on January 8, 2021, in support of PCF's opposition to the Proposed Decision. However, their comments repeated PCF's own arguments.

#	Intervenor's Comment	CPUC Discussion
	D.21-12-064). Both justifications concern the same hours of attorney time.	
B.a	The Public Advocates Office participated before the Commission, but did not file any briefs in the California courts or in the United States Supreme Court. The Public Advocates Office also did not comment on the ALJs' December 11, 2020 Proposed Decision or respond to PCF's application for rehearing of D.21-02-027.	Noted

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
<p>a. Intervenor's claim of cost reasonableness:</p> <p>PCF's advocacy contributed to D.21-12-064 and its clarification of the standard for evaluating requests for intervenor compensation related to the judicial review of Commission decisions. D.21-12-064 will streamline the production and evaluation of future requests for intervenor compensation, conserving applicant and Commission resources. Further, PCF is entitled to fees reasonably incurred to obtain intervenor compensation for its efforts to defend D.17-11-033. <i>See</i> Pub. Util. Code § 1802(a).</p> <p>Moreover, the resources PCF expended—both before the Supreme Court in securing denial of SDG&E's petition for review, as well as before the Commission in seeking to obtain intervenor compensation—are minimal relative to the resulting ratepayer savings. Had the Supreme Court granted the petition for review and ultimately overturned the Commission's decision, ratepayers could have been on the hook for \$379 million of wildfire liability costs incurred by SDG&E.</p>	<p>Noted with respect to PCF's claimed costs for contribution to D.21-12-064. PCF's claims regarding contributions to D.17-11-033 were previously resolved in D.25-01-021, which addressed and disposed of PCF's December 4, 2019 claim related to that decision.</p>
<p>b. Reasonableness of hours claimed:</p> <p>PCF engaged outside counsel to address the complex issues raised in this proceeding. Where possible, research and drafting work associated with PCF's comments on the Proposed Decision and its</p>	<p>Noted. <i>See</i> Part III.D.</p>

	CPUC Discussion
<p>Application for Rehearing was performed by a junior attorney at a lower billing rate. A senior attorney supervised and provided strategic guidance. Although two junior attorneys worked on this effort, they did not perform overlapping work. Instead, Mr. Gonzalez replaced Mr. Stanton—at a lower billing rate—when the latter was unavailable. PCF has excluded from its request the time Mr. Stanton and Mr. Gonzalez spent transitioning this matter.</p> <p>PCF’s General Counsel, Malinda Dickenson, supervised the work of outside counsel. Further, PCF Board Member, Loretta Lynch, provided valuable input and expertise. To avoid any claim of duplication or unreasonableness, however, PCF is <i>not</i> seeking compensation for the time spent by Ms. Lynch.</p> <p>All of the hours claimed in this request were reasonably necessary to the achievement of PCF’s substantial contributions, and no unnecessary duplication of effort is reflected in the attached timesheets. PCF efficiently endeavored to keep its comments and application for rehearing concise.</p>	
<p>c. Allocation of hours by issue:</p> <p>PCF’s entitlement to intervenor compensation = 100%</p> <p>While PCF is requesting fees for a substantial contribution to D.21-12-064 and, in the alternative, a substantial contribution to D.17-11-033, the hours associated with these two contributions completely overlap.</p>	<p>Noted, with respect to D.21-12-064. PCF’s specific contributions to D.17-11-033 were addressed in D.25-01-021, which resolved PCF’s December 4, 2019 claim for contributions to that decision.</p>

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Aaron Stanton	2020	12.8	\$260	ALJ-387; <i>see</i> Comment #1	\$3,328.00	12.80	\$260 [3] [6]	\$3,328.00
Aaron Stanton	2021	6.7	\$305	ALJ-393; <i>see</i> Comment #2	\$2,043.50	2.80 [2]	\$305 [3] [6]	\$854.00
Benjamin Gonzalez	2021	15.4	\$245	ALJ-393; <i>see</i> Comment #3	\$3,773.00	12.40 [2]	\$245 [3] [6]	\$3,038.00
Catherine Engberg	2020	12.5	\$450	ALJ-387; <i>see</i> Comment #4	\$5,625.00	5.78 [2]	\$450 [3] [6]	\$2,601.00
Catherine Engberg	2021	22.2	\$650	ALJ-393; <i>see</i> Comment #5	\$14,430.00	6.80 [2]	\$590 [3] [6]	\$4,012.00
Malinda Dickenson	2020	6	\$450	ALJ-387; <i>see</i> Comment #6	\$2,700.00	3.00 [2]	\$450 [4]	\$1,350.00
Malinda Dickenson	2021	1.5	\$650	ALJ-393; <i>see</i> Comment #7	\$975.00	.75 [2]	\$590 [4]	\$442.50
Subtotal: \$32,874.50						Subtotal: \$15,625.50		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Aaron M. Stanton	2021	6	\$152	½ of rate pursuant to ALJ-393; <i>see</i> Comment #2	\$912.00	6.00	\$152.50 [3] [6]	\$915.00
Subtotal: \$912.00						Subtotal: \$915.00		
TOTAL REQUEST: \$33,786.50						TOTAL AWARD: \$ 16,540.50		
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer’s normal hourly rate</p>								

CLAIMED			CPUC AWARD
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ⁷	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Catherine Engberg	2002	220376	No
Malinda Dickenson	2002	222564	No
Aaron Stanton	2016	312530	No
Benjamin Gonzalez	2019	325853	No

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

Attachment or Comment #	Description/Comment
Attachment #1	Certificate of Service
Attachment #2	Attorney Time Sheet Detail and Categorization
Attachment #3	Attorney Resumes
Comment #1	Aaron Stanton basis for 2020 rate: \$260/hour Mr. Stanton has been practicing law since 2016. Per Resolution ALJ-387, the range of 2020 rates for attorneys of similar levels of experience and training is \$240-\$275. The requested rate of \$260 falls well within this range. Mr. Stanton’s resume is attached.
Comment #2	Aaron Stanton basis for 2021 rate: \$305/hour Mr. Stanton has been practicing law since 2016. Per Resolution ALJ-393, an attorney with 5 years of experience is placed at Level II. Per the hourly rate chart approved with the Resolution, the range for Attorneys at Level II is \$215.07 (low), \$305.99 (median), and \$404.23 (high). PCF understands that these rates include overhead costs. PCF requests a 2021 hourly rate of \$305/hour for Mr. Stanton, which is based on Mr. Stanton’s experience. Mr. Stanton’s resume is attached. Mr. Stanton’s five years of experience would place him among the most experienced of attorneys at Level II, and the requested rate is almost exactly the median rate for attorneys at that level.
Comment #3	Benjamin Gonzalez basis for 2021 rate: \$245/hour Mr. Gonzalez has been practicing law since 2019. Per Resolution ALJ-393, an attorney with 2 years of experience is placed at Level II. Per the hourly rate chart approved with the Resolution, the range for Attorneys at Level II

⁷ This information may be obtained through the State Bar of California’s website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

Attachment or Comment #	Description/Comment
	is \$215.07 (low), \$305.99 (median), and \$404.23 (high). PCF understands that these rates include overhead costs. PCF requests a 2021 hourly rate of \$245/hour for Mr. Gonzalez, which is based on Mr. Gonzalez's experience, and is below the median rate for attorneys at Level II. Mr. Gonzalez's resume is attached.
Comment #4	<p>Catherine Engberg basis for 2020 rate: \$450/hour</p> <p>D.21-02-027, <i>vacated and rehearing granted on other grounds by</i> D.21-12-064, approved Ms. Engberg's 2019 hourly rate of \$440. <i>See</i> D.21-12-027, pp. 12, 17. Ms. Engberg's requested rate for 2020 represents a modest 2% increase over her 2019 hourly rate. Further, in 2020, both Ms. Engberg and Ms. Dickenson had 18 years of experience. The Commission previously approved a 2020 rate of \$450/hour for Ms. Dickenson. <i>See</i> Comment #6. Finally, the requested rate of \$450/hour is well within the range of \$360-\$630 established by Resolution ALJ-387 for attorneys of comparable training and experience in 2020. Ms. Engberg's resume is attached.</p>
Comment #5	<p>Catherine Engberg basis for 2021 rate: \$650/hour</p> <p>Ms. Engberg has been practicing law since 2002. Per Resolution ALJ-393, an attorney with 15+ years of experience is placed at Level V. Per the hourly rate chart approved with the Resolution, the range for Attorneys at Level V is \$486.31 (low), \$606.31 (median), and \$884.06 (high). PCF understands that these rates include overhead costs. PCF requests a 2021 hourly rate of \$650 for Ms. Engberg, which is based on Ms. Engberg's experience and her position as a partner at Shute, Mihaly and Weinberger LLP. Ms. Engberg's resume is attached. The requested rate falls well within the established range of rates for attorneys with Ms. Engberg's level of training and experience and taking into consideration the rates awarded other representatives with comparable training and experience and performing similar services.</p>
Comment #6	<p>Malinda Dickenson basis for 2020 rate: \$450/hour</p> <p>D.21-05-029 and D.21-08-018 approved Ms. Dickenson's 2020 hourly rate of \$450. <i>See</i> D.21-05-029, p. 5 & fn. 6.; p. 9 (Finding of Fact #5); D.21-08-018, p. 21-22; D.21-08-018, p. 25 (Finding of Fact #2).</p>
Comment #7	<p>Malinda Dickenson basis for 2021 rate: \$650/hour</p> <p>Ms. Dickenson has been practicing law since 2002. Per Resolution ALJ-393, an attorney with 15+ years of experience is placed at Level V. Per the hourly rate chart approved with the Resolution, the range for Attorneys at Level V is \$486.31 (low), \$606.31 (median), and \$884.06 (high). PCF understands that these rates include overhead costs. PCF requests a 2021 hourly rate of \$650 for Ms. Dickenson, which is based on Ms. Dickenson's experience and her position as General Counsel for PCF, and is above the median range for Attorneys and below the median range for Legal Directors. Ms. Dickenson's</p>

Attachment or Comment #	Description/Comment
	resume is attached. The requested rate falls well within the established range of rates for attorneys and legal directors with Ms. Dickenson's level of training and experience and taking into consideration the rates awarded other representatives with comparable training and experience and performing similar services.

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Substantial Contribution	<p>D.21-02-027 partially rejected PCF's claim for substantial contributions in the proceeding for review of D.17-11-033 before the United States Supreme Court. PCF subsequently filed an application for rehearing of D.21-02-027. In response, D.21-12-064 granted rehearing and vacated D.21-02-027, finding that the legal standard applied in that decision was incorrect. The Commission clarified that the appropriate standard for determining contribution in a judicial review proceeding is whether the intervenor's work before the reviewing court related to and/or was necessary for the substantial contribution made to the underlying Commission decision that was the subject of judicial review.⁸ For the purpose of determining substantial contribution, it is the Commission's decision- not the court's- that is determinative.</p> <p>D.21-12-064 did not evaluate whether or how PCF contributed to D.17-11-033. Rather, it directed that PCF's December 4, 2019 claim be reconsidered under the correct legal standard and general framework set forth in D.21-12-064.</p> <p>On February 18, 2022, PCF filed the present claim requesting compensation for contributions to D.21-12-064.</p> <p>PCF filed two documents relevant to D.21-12-064: (1) comments on the proposed decision (PD) denying PCF's claim (Comments) filed on December 30, 2020, and (2) an application for rehearing of D.21-02-027 (Rehearing Request), filed on March 19, 2021. While these two documents were substantively identical, there are two notable distinctions:</p>

⁸ See D.21-12-064 at 5.

Item	Reason
	<p>1. In the Comments, PCF argued that the PD erred by not considering the Court's letter requiring the intervenor to submit briefing in the case.</p> <p>2. In the Rehearing Request, PCF stated that D.21-02-027 erred in finding that its arguments regarding new legislation were outside the scope of the proceeding.</p> <p>We find that PCF's application for rehearing prompted the Commission to review its approach to intervenor compensation and to establish the standard and framework for assessing claims related to judicial review proceedings. Accordingly, we find that by challenging D.21-02-027, PCF substantially contributed to D.21-12-064 to vacate that earlier decision.</p>
[2] Reasonableness of the Claim	<p>The claimed 77 hours of attorney time on the intervenor compensation matter are excessive.⁹</p> <p>A. <u>Tasks Related to the Comments</u></p> <p>Approximately 8 of the 14 pages of the Comments detail the issues and arguments opposing the PD's denial of PCF's claim; the remainder summarize the procedural background and PCF's participation. Attorneys Aaron Stanton (Stanton) and Catherine Engberg (Engberg) spent collectively 25.30 hours preparing the Comments- Stanton spent 12.8 hours preparing the Comments, and Engberg spent 12.50 hours supervising Stanton's work. Engberg's time included directing and editing the Comments, as well as performing clerical and administrative tasks, (emailing PCF, coordinating, etc.). The Commission does not compensate for routine clerical and administrative work, as these are included in the hourly rates paid to attorneys.¹⁰ These attorneys' approved rate, established under Resolution ALJ-393, (<i>see</i> Part III.D.3 below), already account for such work. Accordingly, 6.72 hours of Engberg's time spent on administrative /clerical tasks are disallowed.</p>

⁹ See, for example, our award of 5.7 hours (reduced from the requested 7.6 hours) for the contribution to the rehearing involving an intervenor compensation issue (D.16-12-057, 2016 Cal. PUC LEXIS 737, *27). Also, D.19-03-005 awarded compensation for 13.75 hours requested by The Utility Reform Network for its contribution to the rehearing involving considerably more complex matters (D.19-03-005 at 12-13 and 22).

¹⁰ See D.21-10-016 Order Modifying Decision 21-04-009 and Denying Rehearing of the Decision, As Modified, at 6.

Item	Reason
	<p data-bbox="591 296 1195 327">B. <u>Tasks Related to Ex Parte Communications</u></p> <p data-bbox="544 363 1414 688">PCF initiated two ex parte communications to discuss the PD on February 3 and 5, 2021.¹¹ Stanton and Engberg collectively spent approximately 15.50 hours on these activities. Specifically, Stanton spent 5.60 hours researching the rules, emailing, drafting meeting requests, writing talking points, preparing advance and post-meeting notices, and preparing them for filing. Engberg spent 9.90 hours strategizing and coordinating; reviewing, editing, and directing filings; emailing and calling with the client; and attending the meetings. Each ex parte meeting lasted 30 minutes.</p> <p data-bbox="544 724 1414 1199">The 15.5 hours claimed for ex parte preparation are excessive, particularly given that the meetings did not present new arguments or analysis beyond those already addressed in PCF's Comments. Additionally, PCF has prior experience with the Commission's ex parte communication process, which should have reduced the time required for preparation. Therefore, we reduce 2.80 hours of Stanton's time associated with clerical or semi-clerical tasks such as scheduling meetings and preparing notices for filing. We reduce 7.40 hours of Engberg's time spent on non-productive, clerical, and administrative tasks, such as directing a drafting of the notices, coordinating, client emailing and calling, directing filing, directing calendaring, etc. As a result, we approve 5.30 hours for ex parte preparation in connection with the two 30 minute meetings.</p> <p data-bbox="591 1234 992 1266">C. <u>Tasks Related to Rehearing</u></p> <p data-bbox="544 1302 1386 1522">The Rehearing Request consisted of approximately 8.5 pages of discussion and arguments opposing the reductions made in D.21-02-027 to PCF's compensation claim. The remainder of the 19-page document includes summaries of the issues, a description of PCF's participation, and general explanations of the rehearing rules and procedures.</p> <p data-bbox="544 1558 1406 1734">Three attorneys spent a combined total of approximately 28.80 hours preparing the Rehearing Request. Specifically, Stanton spent 1.10 hours attending a voting meeting and calendaring the deadline. Benjamin Gonzalez (Gonzalez) spent a total of 15.40 hours researching rules and practices and drafting the Rehearing Request.</p>

¹¹ Advance notices were filed on January 29, 2021, and post-communication notices on February 5 and 9, 2021.

Item	Reason
	<p>Engberg spent 12.30 hours supervising Gonzalez, calendaring, drafting, editing, and performing other tasks.</p> <p>We find these efforts excessive and inefficient, with several activities non-compensable.¹² Therefore we make the following reductions:</p> <p>We reduce 1.10 hours from Stanton’s time for non-productive and non-compensable tasks, including attending the voting meeting and calendaring.</p> <p>We reduce 3 hours from Gonzalez’s time for activities related to learning facts, rules, and practices new to him.</p> <p>We reduce 8.0 hours from Engberg’s time for clerical and administrative tasks, as well as time spent onboarding a new team member (Gonzalez). These include calendaring, client emailing, coordinating, finalizing, directing drafting of the rehearing request, editing, filing, and other tasks.</p> <p>After the reductions, a total of 16.70 hours is approved.</p> <p style="text-align: center;">D. <u>Duplication and Inefficient Efforts</u></p> <p>PCF states that the third attorney, Malinda Dickenson (Dickenson), supervised the work of two other PCF attorneys. Engaging two senior attorneys –Engberg who supervised a junior attorney and Dickenson who supervised both Engberg and the junior attorney was inefficient. While PCF states that the issues were “complex,” the claim provides no further explanation regarding the legal or factual complexity of the intervenor compensation issue. We find that the multiple layers of supervision were unnecessary, redundant, and inefficient. As a result, we reduce Dickenson’s time supervising the other attorneys by 50%.</p>
[3] Hourly Rates for Shute Mihaly & Weinberger Attorneys	<p>Upon further review, the Commission has learned that PCF employed an external law firm for work in this proceeding. Pursuant to Commission policy, the rate requested by an intervenor must not exceed the rate billed to that intervenor by any outside consultant it hires, even if the consultant’s billed rate is below the floor for a given experience level.¹³ Per the IComp Program Guide at 24, the</p>

¹² See, for example, D.14-07-021 (2014 Cal. PUC LEXIS 313 *6).

¹³ D.07-01-009, D.08-04-010, and ALJ Resolution ALJ 235.

Item	Reason
	<p>Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§ 1804(d)).</p> <p>The Commission requested supplemental documentation regarding the agreements between PCF and the consultants.¹⁴ Instead of the actual agreements, PCF provided declarations signed by Malinda Dickenson¹⁵ and Catherine Engberg¹⁶ confirming that PCF contracted with the law firm Shute Mihaly & Weinberger (SMW), and not specific individual attorneys, to represent PCF in this proceeding.¹⁷</p> <p>The declarations state that pursuant to the agreement between PCF and SMW, should PCF receive intervenor compensation in this proceeding, PCF will pay SMW the difference between any rates awarded to PCF and any amounts previously paid to SMW. SMW agreed to this arrangement expecting that if PCF is successful, SMW may be able to recover – and PCF will pay – the difference between market rates and the below-market rates already billed.¹⁸ Given these terms, we utilize the reasonable rates established by Resolution ALJ-393 based on each consultants’ experience level.</p> <p style="text-align: center;">A. <u>Catherine Engberg’s 2020 and 2021 Rates</u></p> <p><u>Engberg (2020)</u>. Based on the declarations submitted by PCF, upon receipt of the Intervenor Compensation award, PCF will compensate SMW- and in this case, Engberg- for the difference between the awarded market rate and the previously billed below-market rate, in accordance with the terms of their consultant agreement. For work performed in 2020, Engberg billed PCF a below-market rate of \$240 per hour but PCF requests an hourly rate of \$450. Engberg was admitted to the State Bar in July 2002; by the beginning of her participation in the rehearing phase of this proceeding in 2020, she was in her 18th year of practice. The years of experience correspond to a rate range of \$360-\$650 for attorneys with 13+ years of experience, (see Resolution ALJ-387, Adopting</p>

¹⁴ A copy of the e-mail from the Intervenor Compensation Program coordinator sent on November 21, 2024 can be found in the “Correspondence” file for this proceeding.

¹⁵ Attachment 2 to the Supplement.

¹⁶ Attachment 3 to the Supplement, Sections 4 and 5 at 2-3.

¹⁷ Attachment 2 to the Supplement, Section 4.

¹⁸ Attachment 2 to the Supplement, Section 5.

Item	Reason
	<p>Intervenor Compensation Rates for 2020, at 4). We find the requested 2020 hourly rate reasonable and approve it here.</p> <p><u>Engberg (2021)</u>. For work performed in 2021, Engberg billed PCF a below-market rate of \$240 per hour but PCF requests an hourly rate of \$650. In 2021, Engberg was in her 19th year of practicing law. This corresponds to the Attorney V category with a rate range of \$485-\$700 for attorneys with 15+ years of experience.¹⁹ We find \$590 per hour more reasonable for Engberg's experience and approve it here.</p> <p>The award determined herein for the consultant's contribution in this proceeding shall be paid in full to the consultant, and no portion of this part of the award shall be kept by the intervenor. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission's policy on consultant compensation, and the understanding that the consultant has not billed or collected full compensation for the work performed until the final award is given.</p> <p>B. <u>Stanton's 2020 and 2021 Rates</u></p> <p><u>Stanton (2020)</u>. Based on the declarations submitted by PCF, upon receipt of the Intervenor Compensation award, PCF will compensate SMW- and in this case, Stanton- for the difference between the awarded market rate and the previously billed below-market rate, in accordance with the terms of their consultant agreement. For work performed in 2020, Stanton billed PCF a below-market rate of \$215 per hour but PCF requests an hourly rate of \$260. Stanton was admitted to the State Bar of California in December 2016.²⁰ As of December of 2020, the start of his participation in the rehearing phase of the proceeding, Stanton had been an attorney for four years. The years of experience correspond to a rate range of \$240-\$275 for attorneys with 3-4 years of experience (<i>see</i> Resolution ALJ-387, Adopting Intervenor</p>

¹⁹ See Resolution ALJ-393 and Hourly Rate Chart, The Market Rate Chart published on the Commission's website at www.cpuc.ca.gov.

²⁰ The California State Bar database with attorney's licensing information can be accessed at the Bar's webpage at <https://apps.calbar.ca.gov/>.

Item	Reason
	<p>Compensation Rates for 2020 at 4). We find the requested 2020 hourly rate of \$260 reasonable and approve it here.</p> <p><u>Stanton (2021)</u>. For work performed in 2021, Stanton billed PCF a below-market rate of \$215 per hour but PCF requests an hourly rate of \$305. In 2021, Stanton was an attorney for five years, which corresponds to the Attorney II category with a rate range between \$215-\$404 per hour for attorneys with 2-5 years of experience (<i>see</i> Resolution ALJ-393 and Hourly Rate Chart).²¹ We find the requested hourly rate of \$305 reasonable and approve it here.</p> <p>The award determined herein for the consultant's contribution in this proceeding shall be paid in full to the consultant, and no portion of this part of the award shall be kept by the intervenor. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission's policy on consultant compensation, and the understanding that the consultant has not billed or collected full compensation for the work performed until the final award is given.</p> <p>C. <u>Gonzalez's 2021 Rate</u></p> <p><u>Gonzalez (2021)</u>. Based on the declarations submitted by PCF, upon receipt of the Intervenor Compensation award, PCF will compensate SMW- and in this case, Gonzalez- for the difference between the awarded market rate and the previously billed below-market rate, in accordance with the terms of their consultant agreement. For work performed in 2021, Gonzalez billed PCF a below-market rate of \$205 per hour but PCF requests an hourly rate of \$245. Gonzalez was admitted to the State Bar of California in June 2019. Gonzalez was an attorney for two years when he participated in this proceeding. This corresponds to the Attorney II category with a rate range between \$175-\$300 per hour for attorneys with 2 to 5 years of experience, according to Resolution ALJ-393 and Hourly Rate Chart.²² We find the requested hourly rate of \$245 reasonable and approve it here.</p> <p>The award determined herein for the consultant's contribution in this proceeding shall be paid in full to the consultant, and no portion</p>

²¹ The Market Rate Chart is published on the Commission's website at www.cpuc.ca.gov.

²² The Market Rate Chart is published on the Commission's website at www.cpuc.ca.gov.

Item	Reason
	<p>of this part of the award shall be kept by the intervenor. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission's policy on consultant compensation, and the understanding that the consultant has not billed or collected full compensation for the work performed until the final award is given.</p>
<p>[4] Malinda Dickenson 2020 and 2021 Hourly Rates</p>	<p>D.21-05-029 approved a 2020 hourly rate of \$450 for Dickenson. We apply the same hourly rate here.</p> <p>D.22-10-030 approved a 2021 hourly rate of \$590.00 for Dickenson. We apply the same hourly rate here.</p>
<p>[5] Combining Multiple Tasks in the Time Records</p>	<p>PCF inappropriately combined multiple tasks in the same time entry. Pursuant to Rule 17.4(b) of the Commission Rules of Practice and Procedure, time records must identify the specific task performed and the issue that the task addressed. PCF's time record entries often combine several tasks in one time record entry (for example, "direct edits to c[om]m[en]ts; client emails; coordinate filings."). In this case, we do not make reductions for the violation of the Rules, but note that the Commission may, and have reduced claims for combining multiple tasks in a single time record.</p>
<p>[6] Consultant Rates</p>	<p>In considering the intervenor's request for compensation, the Commission reminds the intervenor of its ethical obligation of honesty in Rule 1.1: "Any person who signs a pleading or brief, enters an appearance, offers testimony at a hearing, or transacts business with the Commission, by such act represents that he or she is authorized to do so and agrees to comply with the laws of this State; to maintain the respect due to the Commission, members of the Commission and its Administrative Law Judges; and never to mislead the Commission or its staff by an artifice or false statement of fact or law."</p> <p>The Commission's standard for evaluating Rule 1.1 violations is well established: "A Rule 1.1 violation occurs when there has been a 'lack of candor, withholding of information, or failure to correct information or respond fully....'"²³ The Commission will deny any intervenor request founded in dishonesty. Further, the Commission possesses the statutory authority to impose fines for violations of</p>

²³ D.19-12-041, at *6.

Item	Reason
	<p>Rule 1.1.²⁴ “In determining the amount of such penalty, ... the appropriateness of such penalty to the size of the business charged, the gravity of the violation, and the good faith of the person charged ... shall be considered.”²⁵</p> <p>Under Rule 1.1, the intent to mislead is not required. Rather, “there is ... a line of Commission decisions which holds that situations involving a failure to correctly cite a proposition of law, a lack of candor or withholding of information, and a failure to correctly inform and to correct the mistaken information, are actionable Rule 1 violations. (See D.93-05-020, D.92-07-084, D.92-07-078, D.90-12-038.)”²⁶ Such reckless or grossly negligent acts “can cause the Commission to expend additional staff resources in trying to resolve the misleading statement.”²⁷ “[T]he question of intent to deceive merely goes to the question of how much weight to assign to any penalty that may be assessed.”²⁸</p> <p>This is especially true in the context of intervenor compensation, where intervenor awards are drawn from ratepayers. To root out any inaccurate assertions in requests for compensation, the Commission has the statutory authority to examine intervenor's records: "The commission may audit the records and books of the customer or eligible local government entity to the extent necessary to verify the basis for the award."²⁹</p> <p>Intervenors therefore must be truthful in all their representations to the Commission, including, but not limited to, their contingency fee arrangements, the amounts billed by outside consultants, the amounts actually paid by the intervenors to outside consultants, that the intervenors will not derive any profit or retain any portion of an award given for outside consultants' work, and that the intervenors have made their best efforts to work efficiently and minimize ratepayer costs.</p>

²⁴ Pub. Util. Code, §§ 2107,2108.

²⁵ *Id.*, § 2104.5.

²⁶ D.15-04-021, at *180-182.

²⁷ *Ibid.*

²⁸ *Ibid.*

²⁹ Pub. Util. Code, § 1804(d).

PART IV: OPPOSITIONS AND COMMENTS

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

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

If not:

Party	Comment	CPUC Discussion

FINDINGS OF FACT

1. The Protect Our Communities Foundation has made a substantial contribution to D.21-12-064.
2. The requested hourly rates for The Protect Our Communities Foundation'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 reasonable compensation is \$16,540.50.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. The Protect Our Communities Foundation is awarded \$16,540.50.
2. Within 30 days of the effective date of this decision, San Diego Gas & Electric Company shall pay The Protect Our Communities Foundation the total award. 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 May 4, 2022, the 75th day after the filing of The Protect our Communities Foundation's request, and continuing until full payment is made.

3. The comment period for today's decision is not waived.
4. Application 15-09-010 is closed.

This decision is effective today.

Dated _____, at Sacramento, California

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D2112064		
Proceeding(s):	A1509010		
Author:	Ava Tran		
Payer:	San Diego Gas & Electric Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Protect Our Communities Foundation	02/17/2022	\$33,786.50	\$16,540.50	N/A	Non-compensable tasks, excessive hours, inefficiency, adjusted hourly rates

Hourly Fee Information

First Name	Last Name	Labor Role	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Aaron	Stanton	Attorney	\$260	2020	\$260
Aaron	Stanton	Attorney	\$305	2021	\$305
Benjamin	Gonzalez	Attorney	\$245	2021	\$245
Catherine	Engberg	Attorney	\$450	2020	\$450
Catherine	Engberg	Attorney	\$650	2021	\$590
Malinda	Dickenson	Attorney	\$450	2020	\$450
Malinda	Dickenson	Attorney	\$650	2021	\$590

(END OF APPENDIX)