

**PUBLIC UTILITIES COMMISSION**505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298**FILED**

07/08/26

12:12 PM

R1807003

July 8, 2026

Agenda ID #24365
Ratesetting**TO PARTIES OF RECORD IN RULEMAKING 18-07-003:**

This is the proposed decision of Administrative Law Judge Nilgun Atamturk. 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 13, 2026, 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 of record may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure.

The Commission may hold a Ratesetting Deliberative Meeting to consider this item in closed session in advance of the Business Meeting at which the item will be heard. In such event, notice of the Ratesetting Deliberative Meeting will appear in the Daily Calendar, which is posted on the Commission's website. If a Ratesetting Deliberative Meeting is scheduled, *ex parte* communications are prohibited pursuant to Rule 8.2(c)(4).

/s/ MICHELLE COOKEMichelle Cooke
Chief Administrative Law JudgeMLC:abb
Attachment

Decision PROPOSED DECISION OF ADMINISTRATIVE LAW JUDGE NILGUN ATAMTURK (Mailed 7/8/2026)**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue Implementation and Administration, and Consider Further Development, of California Renewables Portfolio Standard Program.

Rulemaking 18-07-003

**DECISION GRANTING COMPENSATION TO GREEN POWER INSTITUTE
FOR CONTRIBUTION TO DECISIONS (D.) 21-11-029, D.21-12-032,
D.22-01-004, D.22-06-034, D.22-11-021 AND D.22-12-030**

Intervenor: Green Power Institute (GPI)	For contribution to Decisions (D.): D.21-11-029, D.21-12-032, D.22-01-004, D.22-06-034, D.22-11-021 and D.22-12-030, and Resolutions E-5209 and E-5216.
Claimed: \$196,305.00 ¹	Awarded: \$70,197.80
Assigned Commissioner: Christine Harada ²	Assigned ALJs: Nilgun Atamturk and Zita Kline ³

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	<p>Decision D.21-11-029 Clarifying and Improving Confidentiality Rules for the RPS Program.</p> <p>Decision D.21-12-032 Modifies the ReMAT Program and Directs Implementation.</p> <p>Decision D.22-01-004 on the 2021 RPS Procurement Plans of the LSEs.</p> <p>Decision D.22-06-034 Establishes Rules for Portfolio Content Category Classification for Voluntary Allocations of RPS Resources.</p> <p>Decision D.22-11-021 Approves Voluntary Allocations to Lower PCIA Costs.</p> <p>Decision D.22-12-030 on the 2022 RPS Procurement Plans of the LSEs.</p> <p>Resolution E-5209 Updates ReMAT Prices.</p> <p>Resolution E-5216 Approves the Voluntary Allocation Pro Forma Contracts of the IOUs.</p>
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¹ The correct amount claimed is \$198,927.00.

² This proceeding was reassigned to Commissioner Christine Harada on March 26, 2026.

³ This proceeding was co-assigned to ALJ Zita Kline on April 7, 2026.

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:	September 24, 2018	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	October 15, 2018	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.20-05-002	A.18-06-015
6. Date of ALJ ruling:	November 20, 2020	January 23, 2019
7. Based on another CPUC determination (specify):		
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:	RR.20-05-002	A.18-06-015
10. Date of ALJ ruling:	November 20, 2020	January 23, 2019
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§1804(c)):		
13. Identify Final Decision:	D.22-12-030	Verified
14. Date of issuance of Final Order or Decision:	December 19, 2022	Verified
15. File date of compensation request:	February 10, 2023	Verified
16. Was the request for compensation timely?		Yes

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

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
	(Please note that Attachment 2 includes a list of issue areas, and of GPI Pleadings relevant to this Claim.)	Noted, but this does not negate GPI's requirement to provide both citations to its pleadings and citations to the Decision in support of GPI's claim of substantial contribution.
<p>1. 2021 RPS Procurement Plans.</p> <p>The GPI made substantial contributions to D.22-01-004 by critiquing the RPS procurement plans of the IOUs, SMJUs, ESPs, and CCAs, and offering constructive suggestions for improvements in the plans. We stressed the increasing role of the CCAs as procurement agents for grid power, and with it the need for these LSEs to assume a commensurate responsibility for meeting state RPS and other standards. We also stressed the need to take VAMO transactions into account in allocating responsibility for RPS procurement, even though at the time VAMO was a new process. Many of our suggestions were adopted by the Commission, and in cases where the Commission did not</p>	<p>Decision D.22-01-004</p> <p>We find merit in GPI's comments that all retail sellers' RPS Plans may require substantive procurement planning revisions based on VAMO transactions in 2022 and beyond until VAMO processes stabilize. [D.22-01-004, pg. 13.]</p> <p>Regarding a retail seller's role in planning for future load conditions, GPI states that the three IOUs may serve less than half of California load by 2022, indicating a need for CCAs and ESPs to take active steps towards including transportation electrification load forecasting in their RPS procurement plans. We agree with GPI that transportation electrification forecasting is included in the Integrated Energy Policy Report forecast, which serves as the basis for the IRP system-wide capacity expansion and reliability modeling. However, each retail seller must address local transportation electrification adoption trends while planning for portfolio diversity and</p>	<p>Noted, however <i>see</i> Part III.D CPUC Comments, Disallowances and Adjustments.</p> <p>GPI's comments on Transportation Electrification were geared towards IRP and did not enrich the record nor substantially contribute to the RPS procurement plan decision-making process for D.22-01-004. <i>See</i> Part III.D CPUC Comments, Disallowances and Adjustments.</p>

<p>adopt our positions, we made a substantial contribution by enriching the record on which the decision was based.</p>	<p>renewable resource procurement to meet incremental RPS requirements. [D.22-01-004, pg. 22.]</p> <p>In opening comments on the RPS Plans, GPI noted that quantitative risk assessments and modeling shortfalls persist amongst a subset of CCAs and ESPs. GPI believes that while relying on careful and proven developer selection and contract terms may decrease RPS compliance risk for CCAs, it cannot capture or prepare CCAs' RPS portfolios for stochastic influences such as weather. We agree with GPI that CCAs and ESPs should expand their modeling capabilities to inform procurement planning and risk. [D.22-01-004, pg. 59.]</p>	
<p>2. 2022 RPS Procurement Plans.</p> <p>As was the case with the 2021 RPS procurement plans, the GPI made substantial contributions to D.22-12-030 by critiquing the RPS procurement plans of the IOUs, SMJUs, ESPs, and CCAs, and offering constructive suggestions for improvements in the plans. We stressed the increasing role of the CCAs as procurement agents for grid power, and with it the need for these LSEs to assume a commensurate responsibility for meeting state RPS and other standards. We also stressed the need to take VAMO transactions into account in allocating responsibility for RPS procurement, even though at the time only the first part of the process, the voluntary allocation process, had taken</p>	<p>Decision D.22-12-030</p> <p>The other notable element of the IOUs' RPS Plans is the impact of the VAMO process on the RPS portfolio. Retail sellers have only completed the Voluntary Allocations and are yet to participate in the Market Offer process. GPI states, and we agree, that the VAMO process will provide a pathway for IOUs to redistribute excess RPS energy due to load migration to CCAs and ESPs. [D.22-12-030, pg. 19.]</p>	<p>Verified, however <i>see</i> Part III.D CPUC Comments, Disallowances and Adjustments.</p>

<p>place, and the market offer process was still to come. Many of our suggestions were adopted by the Commission, and in cases where the Commission did not adopt our positions, we made a substantial contribution by enriching the record on which the decision was based.</p>		
<p>3. BioMAT Program Rules. The GPI made substantial contributions to D.22-01-004 and D.22-12-030 by commenting on two petitions for modification of the BioMAT program for small (up to 3 MW) biogas and biomass generators, and by actively participating in the technical working group (TWG) process that is studying the alternatives that are available for modeling the greenhouse-gas implications of bioenergy production. Several of our other positions are adopted and others are declined, but in all cases we made substantial contributions by enriching the underlying record of the proceeding.</p>	<p>Pleadings The PFM of the Center for Biological Diversity et. al. makes changes to the BioMAT program that are unnecessary and serve to undercut the process already in progress to ensure the integrity of the program. The premise of the PFM is based on faulty science. Adopting this PFM would hinder a long-beleaguered program that only recently has been revived by D.20-06-043. The PFM must be rejected in its entirety. [Response to PFM, 10/26/20, pg. 8.] The PFM of Bioenergy Association of California, California Association of Sanitation Agencies, and Rural County Representatives of California proposes changes to the BioMAT program that are designed to increase its efficiency and effectiveness, and move us further toward being able to achieve the goals of AB 1122. The policy imperatives that underlay AB 1122 at the time of its passage are even more pressing today, and taking the modest steps that are proposed in the November 16 PFM are well worth taking. The PFM should be expeditiously adopted by the Commission. [Response to PFM, 12/16/21, pgs. 2-3.]</p>	<p>Both Responses listed in Column 2 were filed in another proceeding. We find that all of GPI’s non-TWG claimed hours did not substantially contribute to the decision-making process of either D.22-01-004 or D.22-12-030. Apart from attending TWG meetings and serving as a technical expert on the TWG’s technical committee, GPI’s contributions to the TWG were minimal. <i>See Part III.D CPUC Comments, Disallowances and Adjustments [5].</i></p>
<p>4. ReMAT Program Rules. The GPI made substantial contributions to D.21-12-032 and Resolution E-5209 in the</p>	<p>Decision D.21-12-032 and Res. E-5209 GPI recommended consolidating each of IOUs’ remaining ReMAT capacity into a single bucket, rather than having separate</p>	<p>We find that GPI did not request any hours related to Resolution (Res.)</p>

<p>areas of urging the Commission to allow hybrid renewable / storage facilities to fully participate in the ReMAT program, proposing consolidating ReMAT capacity into a single category in order to streamline the program, and suggesting queue reforms in order to increase efficiency in the program. Most of our suggestions were adopted in the Decision, and in cases where they were not adopted we made a substantial contribution by enriching the record underlying the decision.</p>	<p>targets for each of the three existing product categories. GPI argued there is currently “extreme delay in deploying the authorized megawatts” and a consolidation of product categories would make it “considerably more likely that solar and perhaps some other technologies also could utilize remaining program capacity.” CEUTI and CalWEA agreed with GPI that the capacity could be consolidated into a single category. [D.21-12-032, pgs. 15-16.]</p> <p>Given the difficulty the IOUs have faced in meeting the procurement target for the as-available non-peaking and baseload product categories, and the benefits to the grid that these product categories offer, however, we find it due time to consider parties’ thoughts about incorporating facilities paired with storage into the ReMAT program. [D.21-12-032, pg. 26.]</p> <p>GPI suggested that a modification to the ReMAT contract may be necessary for clarity purposes, but that hybrid storage should be eligible for ReMAT. [D.21-12-032, pg. 28.]</p> <p>GPI suggested that e-mail notification to alert projects in the ReMAT queue of any potential modification(s) to the IOUs’ ReMAT PPAs and tariffs is sufficient. ... We find these recommendations reasonable and that the IOUs could accommodate them with little, if any, incremental costs. [D.21-12-032, pg. 38.]</p>	<p>E-5209 nor did it make a substantial contribution to Res. E-5209. However, we do find in some areas that GPI made a substantial contribution to D.21-12-032. <i>See</i> Part III.D CPUC Comments, Disallowances, and Adjustments [6].</p>
<p>5. Confidentiality Rules.</p> <p>GPI made substantial contributions to D.21-11-029 by arguing for maximum disclosure of data subject to confidentiality restraints, for uniform treatment of data from</p>	<p>Decision D.21-11-029</p> <p>Amongst the nonmarket participants, TURN, GPI, and Defenders support the Staff Proposal’s recommendation to set the same standards of confidentiality across all retail sellers. ... GPI states that customers, stakeholders, and third</p>	<p>Verified</p>

<p>different LSE categories, and for limiting the period during which confidential data can be withheld. Many of our suggestions were adopted by the Commission, and in cases where the Commission did not adopt our positions, we made a substantial contribution by enriching the record on which the decision was based.</p> <p>We note that the hours that were devoted to developing our March and April filings on RPS confidentiality rules (<i>see</i> Attachment 2) were included in a previous IComp claim, and have already been compensated by D.22-06-042. The only hours devoted to the confidentiality issues that are included in this Claim are the hours associated with the development of GPI’s comments on the PD.</p>	<p>parties must monitor the CCAs’ progress to ensure they achieve statewide RPS goals. [D.21-11-029, pg. 26.]</p> <p>GPI’s comments support the Staff Proposal to accelerate the disclosure of an additional year of forecasted RPS procurement for all retail sellers.⁸³ GPI states that reducing the confidentiality restrictions from a forecasted three future years to the “front two years” will better assess near-term to mid-term compliance at the statewide level. [D.21-11-029, pgs. 30-31.]</p> <p>GPI’s reply comments suggest that the existing disclosure of a retail seller’s past year load forecast and net short position data within the same compliance period is not different from the newly proposed two future years confidentiality recommendation in the Staff Proposal. GPI suggests a sliding confidentiality timeframe that would allow the current year and the three forward years to remain confidential in a four-year compliance cycle. [D.21-11-029, pg. 32.]</p> <p>TURN, GPI, Defenders, CUE support the Staff Proposal to disclose RPS data ahead of the current window of confidentiality. GPI recommends that RPS cost and non-cost data for CCA and ESP solicitations become publicly available on a timeline parallel to IOU solicited bid data disclosure. [D.21-11-029, pg. 39.]</p> <p>GPI, TURN, and Defenders support increased disclosure of confidential RPS contract information. GPI recommends that the Staff Proposal include parallel transparency requirements for CCA and ESP RPS bids as the IOUs, following the negotiations/contract finalization. ... Both GPI and TURN recommend disclosing ESP’s and CCA’s non-cost</p>	
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	<p>values such as resource type, location, and capacity six months after the contract is signed, or 30 days after deliveries (energy deliveries including deliveries from projects with REC contracts) begin under the contract, whichever occurs first. [D.21-11-029, pgs. 53-54.]</p>	
<p>6. Voluntary Allocations of IOU RPS Contracts.</p> <p>GPI made substantial contributions to D.22-06-034, D.22-11-021, and Res. E-5216 by advancing arguments that the voluntary allocation of RPS resources from the IOUs holding the surplus contracts to CCAs and ESPs in their territory should not affect the existing RPS contracts or REC category status, that sales of RPS contracts from one LSE to another LSE in a market offer transaction should not affect the integrity of the contract that is sold, that VAMO transactions should be factored into future RPS procurement plans, and that definitional and trading terms for REC(0)s are fast becoming mute issues as these grandfathered instruments are rapidly expiring. Most of our suggestions were adopted by the Commission, and in cases where the Commission did not adopt our positions, we made a substantial contribution by enriching the record on which the decision was based.</p>	<p>Decisions D.22-06-034 and D.22-11-021, and Res. E-5216</p> <p>We agree with the Joint IOUs, CalCCA, GPI, and Shell Energy that the Voluntary Allocation process does not intend for sales between IOUs and LSEs to alter future PCC designations. The Joint IOUs and CalCCA make a reasonable argument that neither statute nor CPUC decisions have directly determined whether Voluntary Allocations under VAMO are resales or not. We find merit in the reasoning that under Voluntary Allocations, IOUs are not authorized to negotiate terms related to the underlying contract, such as price, counterparty (only LSEs serving departed load are eligible), or quantity, unlike a resale transaction. The voluntary distribution/ allocation process is distinct from a market-based transaction, and Voluntary Allocations should not be considered resales. Therefore, all allocation shares (RPS energy and/or RECs) distributed under the Voluntary Allocation mechanism should retain their original PCC classification, including PCC-0 RECs. [D.22-06-034, pgs. 11-12.]</p> <p>We find merit in GPI’s comments that PCC 0 contracts will become extinct once expired or resold in market offers while no new PCC 0 RECs are being created. Considering that PCC 0 RECs are declining and may not contribute substantially to future compliance periods, it is unreasonable to devote resources to a comprehensive review of</p>	<p>Noted, with respect to the GPI’s claim of substantial contribution to D.22-06-034 and D.22-11-021.</p> <p>We do not find, however, that GPI made a substantial contribution to Res. E-5216. GPI has not listed any hours in its timesheets for work on Res. E-5216 in which it seeks compensation. As such, there are no reductions in hours necessary. <i>See</i> Part III.D CPUC Comments, Disallowances, and Adjustments [7].</p>

	<p>an issue that may have little relevance. [D.22-06-034, pgs. 12-13.]</p> <p>GPI asserts there are inconsistencies in the IOUs’ joint filing that it recommends should be corrected. GPI notes several places where the products being sold are referred to as REC purchases and offers with undefined product increments but should instead be changed to “RPS eligible products ... being offered in 10 percent slices that remain under IOU management.” [D.22-11-021 pg. 11.]</p> <p>GPI states that the IOUs’ Market Offer Proposal is inconsistent regarding the process of the sale of energy and RECs from RPS resources. GPI recommends updating all references to REC purchases and offers to reflect that those remaining RPS-eligible products will be offered in 10 percent slices and that the resultant RECs are subject to the output of these products. ... We agree with GPI that the Market Offer Proposal language should accurately and consistently describe the process of selling RPS energy resources. The Market Offer Proposal should be consistent in its use of terminology. [D.22-11-021, pgs. 21-22.]</p>	
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B. Duplication of Effort (§§ 1801.3(f) and 1802.5):

	INTERVENOR’S ASSERTION	CPUC DISCUSSION
a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: TURN, CEERT, UCS, NRDC, LSSA, CalWEA, Bioenergy Association, Placer Co. APCD, and the three large electric IOUs.		Noted
d. Intervenor’s claim of non-duplication: This proceeding covers a wide variety of topics related to California’s multifaceted RPS program. The		Noted

<p>Green Power Institute has been an active participant in the Commission’s RPS proceedings since the inception of the program, and is continuing these efforts in the present proceeding (R.18-07-003). The Green Power Institute coordinated its efforts in this proceeding with other parties in order to avoid duplication of effort, and added significantly to the outcome of the Commission’s deliberations through our own unique perspective. Some amount of duplication has occurred in this proceeding on all sides of contentious issues, but Green Power avoided duplication to the extent possible, and tried to minimize it where it was unavoidable.</p>	
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PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

INTERVENOR’S DISCUSSION	CPUC DISCUSSION
<p>a. Intervenor’s claim of cost reasonableness:</p> <p>The GPI is providing, in Attachment 2, a listing of all of the pleadings we provided in this Proceeding, R.18-07-003, that are relevant to matters covered by this Claim, and in Attachment 3 a detailed breakdown of GPI staff time spent for work performed that was directly related to our substantial contributions to Decisions D.21-11-019, D.21-12-032, D.22-01-004, D.22-06-034, D.22-11-021, and D.22-12-030, and Resolutions E-5209 and E-5216.</p> <p>The hours claimed herein in support of Decisions D.21-11-019, D.21-12-032, D.22-01-004, D.22-06-034, D.22-11-021, and D.22-12-030, and Resolutions E-5209 and E-5216 are reasonable given the scope of the Proceeding, and the strong participation by the GPI. GPI staff maintained detailed contemporaneous time records indicating the number of hours devoted to the matters settled by these Decisions in this case. In preparing Attachment 2, Dr. Morris reviewed all of the recorded hours devoted to this proceeding, and included only those that were reasonable and contributory to the underlying tasks. As a result, the GPI submits that all of the hours included in the attachment are reasonable, and should be compensated in full.</p> <p>Dr. Morris is a renewable energy analyst and consultant with more than 35 years of diversified experience and accomplishments in the energy and environmental fields. He is a nationally recognized expert on biomass and renewable energy, climate change and greenhouse-gas emissions analysis, integrated resources planning, and analysis of the environmental impacts of electric power generation. Dr. Morris holds a BA in Natural Science from the University of Pennsylvania, an MSc in Biochemistry from the University of Toronto, and a PhD in Energy and Resources from the University of California, Berkeley.</p> <p>Dr. Morris has been actively involved in electric utility restructuring in California throughout the past two decades. He served as editor and facilitator for the Renewables Working Group to the California Public Utilities Commission in 1996 during the original restructuring effort, consultant to the CEC Renewables Program Committee, consultant to the Governor’s Office of Planning and</p>	<p>After the adjustments made to this claim, the remainder of the claimed costs are reasonable. <i>See</i> Part III.D.</p>

Research on renewable energy policy during the energy crisis years, and has provided expert testimony in a variety of regulatory and legislative proceedings, as well as in civil litigation.

Mr. Hunt is a renewable energy law and policy expert with substantial experience in California, in local energy planning and in state energy-policy development. He has worked with local governments throughout Southern California, in his current role with Community Renewable Solutions LLC and in his previous role as Energy Program Director for the Community Environmental Council, a well-known non-profit organization based in Santa Barbara. Mr. Hunt was the lead author of the Community Environmental Council's A New Energy Direction, a blueprint for Santa Barbara County to wean itself from fossil fuels by 2030. Mr. Hunt also contributes substantially to state policy, in Sacramento at the Legislature, and in San Francisco at the California Public Utilities Commission, in various proceedings related to renewable energy, energy efficiency, community-scale energy projects, and climate change policy. Mr. Hunt is also a Lecturer in Climate Change Law and Policy at UC Santa Barbara's Bren School of Environmental Science & Management (a graduate-level program) from 2007-2014. He received his law degree from the UCLA School of Law in 2001, where he was chief managing director of the Journal for International Law and Foreign Affairs. Mr. Hunt is a regular columnist at GreenTechMedia.com.

Dr. Zoë Harrold has worked for the Green Power Institute (GPI) for a total of more than 10 years, as a Research Assistant from 2006 to 2008, and again as a Scientist from 2015 to present. Through her work with the GPI she has been engaged with the development of the Renewable Portfolio Standard (RPS), and the Integrated Resources Planning (IRP) framework. Her work with the RPS includes crosschecking renewable resource procurement within RPS Compliance Report spreadsheets, reviewing and summarizing RPS proceedings, identifying loopholes, and assisting in the preparation of pleadings. Her work with the IRP proceeding includes preparing comments and recommendations on behalf of the GPI based on critical reviews of the IOUs' and other LSEs' IIRPs and subsequent Proposed Decisions, working group reports, workshop materials, demonstration proposals and final reports, and third-party comments. Dr. Harrold earned a Ph.D. in geomicrobiology from the University of Washington, Department of Earth and Space Science in 2014. Her work on modeling networks in the environment has strong ties to her analytical work in the RSP proceeding.

Decision D.98-04-059 states, on pgs. 33-34, "Participation must be productive in the sense that the costs of participation should bear a reasonable relationship to the benefits realized through such participation. ... At a minimum, when the benefits are intangible, the customer should present information sufficient to justify a Commission finding that the overall benefits of a customer's participation will exceed a customer's costs." This proceeding is concerned with the refinement of elements of the state's RPS program, and the ongoing administration of the program. The cost reductions and environmental benefits of improving the RPS program overwhelm the cost of our participation in this proceeding.

<p>b. Reasonableness of hours claimed:</p> <p>The GPI made Significant Contributions to Decisions D.21-11-019, D.21-12-032, D.22-01-004, D.22-06-034, D.22-11-021, and D.22-12-030, and Resolutions E-5209 and E-5216 by actively participating in workshops and working groups, and providing a series of Commission filings on the various topics that were under consideration in the Proceeding and are covered by this Claim. Attachment 3 provides a detailed breakdown of the hours that were expended in making our Contributions. The hourly rates and costs claimed are reasonable and consistent with awards to other intervenors with comparable experience and expertise. The Commission should grant the GPI’s claim in its entirety.</p>	<p>After the adjustments made to this claim, the remainder of the claimed hours are reasonable. <i>See</i> Part III.D.</p>																								
<p>c. Allocation of hours by issue:</p> <table border="0"> <tr> <td>1. 2019 RPS Procurement Plans</td> <td>25%</td> </tr> <tr> <td>2. 2020 RPS Procurement Plans</td> <td>25%</td> </tr> <tr> <td>3. BioMAT Program Rules</td> <td>20%</td> </tr> <tr> <td>4. ReMAT Program Rules</td> <td>15%</td> </tr> <tr> <td>5. Confidentiality Rules</td> <td>5%</td> </tr> <tr> <td>6. Voluntary Allocations of IOU RPS Contracts</td> <td>10%</td> </tr> </table>	1. 2019 RPS Procurement Plans	25%	2. 2020 RPS Procurement Plans	25%	3. BioMAT Program Rules	20%	4. ReMAT Program Rules	15%	5. Confidentiality Rules	5%	6. Voluntary Allocations of IOU RPS Contracts	10%	<p>According to GPI’s submitted timesheets, our calculations are as follows:</p> <table border="0"> <tr><td>1.</td><td>28.0%</td></tr> <tr><td>2.</td><td>23.2%</td></tr> <tr><td>3.</td><td>21.1%</td></tr> <tr><td>4.</td><td>13.6%</td></tr> <tr><td>5.</td><td>1.3%</td></tr> <tr><td>6.</td><td>12.8%</td></tr> </table>	1.	28.0%	2.	23.2%	3.	21.1%	4.	13.6%	5.	1.3%	6.	12.8%
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6.	12.8%																								

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
G. Morris	2020	34.50	\$335.00	D.21-03-040	\$11,558.00 ⁵	7.00 [5, 6, 8]	\$335.00 [1, 11]	\$2,345.00
G. Morris	2021	111.50	\$450.00	D.22-06-041	\$50,175.00	34.50 [5, 6, 8]	\$440.00 [1, 11]	\$15,180.00
G. Morris	2022	70.00	\$465.00	See comment 1	\$32,550.00	29.50 [5, 6, 8]	\$450.00 [1, 11]	\$13,275.00
Z. Harrold	2021	104.50	\$280.00	See comment 2	\$29,260.00	41.50 [8]	\$225.00 [2, 11]	\$9,337.50

⁵ The correct total is \$11,557.50. We direct GPI to not round its totals, but to list the exact dollar amount without rounding in all future claims it files.

CLAIMED						CPUC AWARD		
Z. Harrold	2022	126.75	\$285.00	See comment 2	\$36,124.00 ⁶	54.25 [8]	\$250.00 [2, 11]	\$13,562.50
T. Hunt	2020	7.75	\$460.00	D.21-03-042	\$3,565.00	0.00 [6]	N/A [3, 11]	\$0.00
T. Hunt	2021	40.75	\$585.00	D.22-06-041	\$23,839.00 ⁷	27.75 [6]	\$475.00 [3, 11]	\$13,181.25
T. Hunt	2022	9.50	\$605.00	See comment 3	\$5,748.00 ⁸	0.25 [6]	\$605.00 [3, 11]	\$151.25
R. Davis	2020	0.20	\$360.00	D.21-03-042	\$72.00	0.00 [6]	N/A [4, 11]	\$0.00
R. Davis	2021	3.90	\$475.00	D.22-06-041	\$1,853.00 ⁹	3.90	\$475.00 [4, 11]	\$1,852.50
Subtotal: \$192,818.00¹⁰						Subtotal 1: \$68,885.00		
						Adjustment [10]: -\$712.20		
						Subtotal 2: \$68,172.80		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
G. Morris	2022	15.00 ¹¹	\$232.50	½ 2022 rate	\$3,488.00 ¹²	9.00 [9]	\$225.00 [2, 11]	\$2,025.00
Subtotal: \$3,487.50¹³						Subtotal: \$2,025.00		
TOTAL REQUEST: \$196,305.00¹⁴						TOTAL AWARD: \$70,197.80		
<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</p>								

⁶ The correct total is \$36,123.75 without rounding.

⁷ The correct total is \$23,838.75 without rounding.

⁸ The correct total is \$5,747.50 without rounding.

⁹ The correct total is \$1,852.50 without rounding.

¹⁰ The correct subtotal is \$194,742.00.

¹¹ GPI's submitted timesheet totals 18.00 hours for Intervenor Compensation Claim Preparation.

¹² The correct total is \$4,185.00.

¹³ The correct total is \$4,185.00.

¹⁴ The correct Total Request is \$198,927.00.

CLAIMED		CPUC AWARD	
<p>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>***Reasonable Claim preparation time is typically compensated at ½ of preparer’s normal hourly rate</p>			
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ¹⁵	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Tamlyn Hunt	November 2001 ¹⁶	218673	No
Rebecca Davis	December 2010	271662	No

C. Attachments Documenting Specific Claim and Comments on Part III:¹⁷

ATTACHMENT OR COMMENT #	DESCRIPTION/COMMENT
Attachment 1	Certificate of Service
Attachment 2	Allocation of effort by issue, list of pleadings
Attachment 3	Breakdown of hourly efforts by issue category
Attachment 4	Resolution E-5209
Attachment 5	Resolution E-5216
Comment 1	The Commission has adopted a 3.31 percent adjustment for rates in the Market Rate Study for converting the 2021 values in the study to 2022 values. This value can be found on the Escalation tab of the Hourly Rate Chart spreadsheet on the Commission’s web site. We apply the 3.31 percent escalator to the approved 2021 hourly rate for Morris and round to the nearest 5 per regular Commission practice, which produces a 2022 rate of \$465/hr.
Comment 2	Dr. Harrold does not yet have an approved rate for 2021. GPI has requested a rate for Dr. Harrold for 2021 of \$280/hr. This rate request is pending in Claims filed in R.14-08-013 et. al. (filed 10/22/21), R.18-10-007 (filed 2/11/22), and R.20-05-003 (filed 3/4/22), A-22-12-013 (filed 12/16/22). The latter two requests also include a request for Dr. Harrold for 2022 of \$285, based on applying the 3.31 percent adjust as discussed above for comment 1. That is the rate we are requesting here as well.

¹⁵ This information may be obtained through the State Bar of California’s website at: <https://apps.calbar.ca.gov/attorney/LicenseeSearch/QuickSearch>.

¹⁶ The State Bar of California’s website shows the correct admission date for Hunt is January 29, 2002.

¹⁷ Attachments are not included in the final decision.

Comment 3	The Commission has adopted a 3.31 percent adjustment for rates in the Market Rate Study for converting the 2021 values in the study to 2022 values. This value can be found on the Escalation tab of the Hourly Rate Chart spreadsheet on the Commission’s web site. We apply the 3.31 percent escalator to the approved 2021 hourly rate for Hunt, and round to the nearest 5 per regular Commission practice, which produces a 2022 rate of \$605/hr.
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D. CPUC Comments, Disallowances, and Adjustments

On September 16, 2025, a ruling was issued requesting GPI to submit additional information for various claims because the Commission had identified several issues within the claims, including: omission of required information, unclear or inconsistent details, invoices that did not align with submitted timesheets or hours claimed, invoices that included work unrelated to the claim at issue, making it difficult to determine which rates / hours apply to the specific claim, invoices billed to other entities that did not identify GPI or the consultant, and other inconsistencies that hindered the Commission’s ability to evaluate and resolve the claims.

GPI was provided with an opportunity to submit supplemental information, including resumes for all individuals for whom compensation is sought, invoices reflecting the actual billed rates for each consultant (broken down by claim), and consultant agreements for those retained on a contingency basis, where payment of consulting fees is deferred and contingent upon the receipt of an IComp award.

GPI filed its response for supplement information for this proceeding on October 7, 2025. In its response, GPI confirmed the following:

1. GPI is a program of the Pacific Institute and is not a separate or independent entity and does not conduct business outside of or apart from the Pacific Institute.
2. GPI is a registered fictitious business name of the Pacific Institute and is the renewable energy program of the Pacific Institute.¹⁸ (However, the Commission notes that this fictitious business name expired in 2018).
3. Gregg Morris’ agreement with the Pacific Institute is that when intervenor compensation payments are made to GPI, the Pacific Institute retains their overhead charge and pays the rest to Morris via Future Resources Associates, his dba company.
4. Through Future Resources Associates, Morris pays consultants an initial upfront payment, followed by a second payment once the intervenor compensation award is issued.

¹⁸ Public records found at Alameda County Clerk Recorder Office’s reflect that fictitious business name Green Power Institute, was active from 6/11/2013 to 6/11/2018 and is currently expired.

5. GPI states that the remaining award is used to pay the carrying costs of participation in Commission proceedings, the cost of the risk that not all hours in a given claim will be approved for payment, and the salary of Morris.
6. GPI states that Morris works entirely on a contingency basis and does not issue monthly invoices.

We make the following adjustments below based on the information at hand and an assessment of GPI’s contribution to the decisions.

ITEM	REASON
<p>[1] Morris’ 2020, 2021, 2022 Hourly Rates</p>	<p>Although GPI continues to identify Morris as an employee of GPI, serving as its director, supplemental information provides conflicting information and confirms that Morris is dba Future Resources Associates, working on a contingency basis for the Pacific Institute, meaning that Morris has agreed to defer his consulting fee contingent upon receipt of this intervenor compensation award.</p> <p>Given this contingency, we utilize the reasonable rates established by Resolution ALJ -387 and Resolution ALJ-393 based on Morris’ experience as an Advocate - Executive Director - Level V.</p> <p>Given Morris’ experience, we approve the hourly rate of \$335.00 for 2020, \$440 for 2021, and \$450 for 2022. We apply one-half of Morris’ approved 2022 hourly rate of \$450.00 for a 2022 intervenor compensation claim preparation rate of \$225.00.</p>
<p>[2] Harrold’s 2021 and 2022 Hourly Rates</p>	<p>Although GPI continues to identify Harrold as a staff associate of GPI, supplemental information provided confirms that Harrold is a consultant, who in turn bills Future Resources Associates (not GPI or the Pacific Institute) for work in this proceeding.</p> <p>The Commission requested supplemental documentation be submitted by GPI to confirm the rates charged by Harrold. GPI filed the “Associate Service Agreement Addendum”¹⁹ between Future Resources Associates (Morris) and Harrold under seal, but states that per the terms of the contract, Harrold has been hired on a contingency basis where Harrold receives an initial payment upon invoicing, followed by a second payment contingent upon receipt of this intervenor compensation award.</p> <p>Based on these terms, we approve an hourly rate of \$225 for 2021, and \$250 for 2022.</p>

¹⁹ GPI did not provide the existing Associate Services Agreement it references from October 2010 as part of its supplemental documentation. While the Commission will accept the Addendum as a contractual agreement between Future Resources Associates (Morris) and Harrold, for purposes of this proceeding, GPI is reminded that the Commission strictly requires full and accurate disclosure of all information material to request for intervenor compensation.

	<p>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>We reiterate that it is the responsibility of the intervenor to be forthcoming about engaging consultants and the terms of the contract, to adhere to the Commission’s policy on compensation for consultant fees, and to provide the appropriate documentation with the initial claim to ensure efficient processing, and thus avoid the need for the Commission to request supplemental documentation. In this instance, GPI did not provide all the documentation pertaining to the contract terms between GPI and Harrold in the initial claim and waited until the Commission requested supplemental documentation, which significantly delayed the processing of this claim.</p>
<p>[3] Hunt’s 2020, 2021, and 2022 Hourly Rates</p>	<p>Although GPI continues to identify Hunt as a staff associate of GPI, supplemental information provided confirms that Hunt works for Community Renewables Solutions LLC, who in turn bills Future Resources Associates, (not GPI or the Pacific Institute) for work in this proceeding.</p> <p>The Commission requested supplemental documentation be submitted by GPI to confirm the rates charged by Hunt. GPI filed the “Associate Service Agreement Addendum”²⁰ between Future Resources Associates (Morris) and Community Renewables Solutions LLC (Hunt) under seal, but claims that per the terms of the contract, Hunt has been hired on a contingency basis, where Hunt receives an initial payment upon invoicing, followed by a second payment contingent upon receipt of this intervenor compensation award.</p> <p>Based on these terms, we approve an hourly rate of \$475 for 2021, and \$605 for 2022. We do not determine an hourly rate for 2020 as Hunt is not awarded any hours in 2020 in this claim as discussed below in Item [6] and reflected in Part III.B.</p> <p>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>We reiterate that it is the responsibility of the intervenor to be forthcoming about engaging consultants and the terms of the contract, to adhere to the Commission’s policy on compensation for consultant fees, and to provide the</p>

²⁰ GPI did not provide the existing Associate Services Agreement it references from October 2010 as part of its supplemental documentation. While the Commission will accept the Addendum as a contractual agreement between Future Resources Associates (Morris) and Community Renewables Solutions LLC (Hunt), for purposes of this proceeding, GPI is reminded that the Commission strictly requires full and accurate disclosure of all information material to request for intervenor compensation.

	<p>appropriate documentation with the initial claim to ensure efficient processing, and thus avoid the need for the Commission to request supplemental documentation. In this instance, GPI did not provide all the documentation pertaining to the contract terms between GPI and Hunt in the initial claim and waited until the Commission requested supplemental documentation, which significantly delayed the processing of this claim.</p>
<p>[4] Davis’ 2021 Hourly Rate</p>	<p>Although GPI continues to identify Davis as a staff associate of GPI, supplemental information provided confirms that Davis works for Lozeau Drury LLP, who in turn bills Future Resources Associates (not GPI or the Pacific Institute) for work in this proceeding.</p> <p>The Commission requested supplemental documentation be submitted by GPI to confirm the rates charged by Davis. GPI failed to provide the consultant contract as required, and states that they are unable to locate Davis’ invoice for 2020, but does provided an invoice for Davis’ 2021 work in this proceeding.²¹ GPI claims that Davis has been hired on a contingency basis, where Davis has agreed to defer their consulting fee contingent upon receipt of this Intervenor Compensation award.</p> <p>Because GPI did not provide a consulting agreement or any invoices for Davis’ work in 2020, we are unable to verify the requested rate, payment terms, or hours. Consequently, no hourly rate or hours are awarded for Davis for 2020. However, we approve an hourly rate of \$475 for 2021 based on the invoices provided.</p> <p>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>We reiterate that it is the responsibility of the intervenor to be forthcoming about engaging consultants and the terms of the contract, to adhere to the Commission’s policy on compensation for consultant fees, and to provide the appropriate documentation with the initial claim to ensure efficient processing, and thus avoid the need for the Commission to request supplemental documentation. In this instance, GPI did not provide all the documentation pertaining to the contract terms between GPI and Davis in the initial claim and waited until the Commission requested supplemental documentation, which significantly delayed the processing of this claim.</p>
<p>[5] Lack of Substantial</p>	<p>Public Utilities Code §1802(j) states that a substantial contribution “has substantially assisted the commission in the making of its order or decision</p>

²¹ GPI did not provide the existing Associate Services Agreement it references from November 2020 as part of its supplemental documentation. While the Commission will accept the invoice from Lozeau Drury LLP as a contractual agreement between Future Resources Associates (Morris) and Lozeau Drury LLP (Davis), for purposes of this proceeding, GPI is reminded that the Commission strictly requires full and accurate disclosure of all information material to request for intervenor compensation.

<p>Contribution - BioMAT Program Rules</p>	<p>because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer.” The courts have addressed the requirement of substantial contribution in, for example, TURN v. CPUC 166 Cal.App. 4th 522 (2008), stating at 11:</p> <p>“[T]o be eligible for compensation, the statute requires that the customer have made a ‘substantial contribution’ to the PUC’s proceedings, as the PUC determines. “‘Substantial contribution’ means that, in the judgment of the commission, the customer’s presentation has substantially assisted the commission in the making of its order or decision....”</p> <p>In evaluating whether GPI made a substantial contribution here, the Commission evaluates whether the hours claimed were commensurate with the contributions claimed by the intervenor. Making a substantial contribution in and of itself does not entitle an intervenor to all its claimed fees and costs. Compensation is granted for efficient, meaningful contributions.</p> <p><u>Technical Working Group (TWG) (25.00 hours reduced)</u></p> <p>GPI claimed 49.00 hours for Morris’ 2021 and 2022 time working on the TWG. GPI’s contribution to the TWG mainly consisted of attending 11 general and technical meetings, serving on the TWG technical committee, and providing input at meetings. However, this does not necessitate that GPI’s contribution was substantial. GPI’s only other contribution consisted of providing feedback in August 2021 regarding the TWG rubric. We therefore find that GPI’s time working on the TWG only minimally contributed to the decision-making process and therefore find it reasonable to reduce 25.00 hours, or roughly 50% of GPI’s 49.00 hours claimed working on the TWG, which breaks down as follows:</p> <ul style="list-style-type: none"> • 2021 Morris: 22.00 hours • 2022 Morris: 3.00 hours <p><u>Non-TWG Hours (58.50 hours reduced)</u></p> <p>After removing hours related to the TWG, GPI claimed 58.50 hours for Morris’ work on as “BioMAT Program Rules.” In Part II.A.3, GPI failed to list a single specific citation to anywhere in a Decision to support its claim of substantial contribution to this issue. D.22-01-004 and D.22-12-030 also did not resolve BioMAT related positions.</p> <p>Additionally, the only documents listed in the second column of Part II.A.3 were filed in R.11-05-005. The Intervenor Compensation Program Guide at 20 states that intervenors are supposed to list a “citation to the specific portions documents <i>filed in the proceeding</i> . . . reflecting the intervenor’s testimony/arguments.”²² While R.11-05-005 is a predecessor proceeding to R.18-07-003 the Decisions denying those Petitions for Modification were issued as part of the docket for R.11-05-005. Therefore, GPI should have</p>
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²² Emphasis added.

	<p>filed an Intervenor Compensation Claim in R.11-05-005, and not R.18-07-003, for their work on these Petitions. As such, we find it reasonable to reduce all non-TWG hours claimed by GPI for Morris’ work on “BioMAT Program Rules” for these being out of scope of this proceeding and for failing to substantially contribute to the decision-making process, which breaks down as follows:</p> <ul style="list-style-type: none"> • 2020 Morris 23.50 hours • 2021 Morris 33.00 hours • 2022 Morris: 2.00 hours
<p>[6] Lack of Substantial Contribution - ReMAT Program Rules</p>	<p>In evaluating whether GPI made a substantial contribution here, the Commission evaluates whether the hours claimed were commensurate with the contributions claimed by the intervenor. Making a substantial contribution in and of itself does not entitle an intervenor to all its claimed fees and costs. Compensation is granted for efficient, meaningful contributions.</p> <p><u>Advice Letters (9.95 hours reduced)</u> GPI claimed 9.95 hours for Davis’, Hunt’s, and Morris’ 2020 work on Advice Letter (AL) 4431-E and another unnamed AL regarding ReMAT. Their work included reviewing the ALs, drafting a response, and reviewing a response to GPI’s response. The claimed hours are excessive and did not require the time of three experts. GPI fails to provide any justification as to why its work on the ALs substantially contributed to this proceeding in Part II.A nor do they include their Response in their list of pleadings in Attachment 2. We therefore reduce all 9.95 hours claimed on AL 4431-E for lack of substantial contribution to the decision-making process, which breaks down as follows:</p> <ul style="list-style-type: none"> • 2020 Davis: 0.20 hours • 2020 Hunt: 7.75 hours • 2020 Morris: 2.00 hours <p><u>Proposed Decision on ReMAT Program Reform (15.50 hours reduced)</u> From November 10, 2021, to December 6, 2021, GPI claimed 15.50 hours for Hunt’s and Morris’ work on the Proposed Decision on ReMAT program reform. Their work included reviewing the Proposed Decision, drafting comments, reviewing other parties’ comments, and drafting reply comments. However, there is no evidence of any comments or reply comments by GPI in this proceeding’s docket from when the Proposed Decision was filed on November 10, 2021, to when all of the reply comments were due on December 6, 2021. Further, GPI does not mention their comment or reply comment in Part II.A or in their list of pleadings in Attachment 2. We therefore reduce all 15.50 claimed hours on the Proposed Decision for lack of substantial contribution to the decision-making process, which breaks down as follows:</p> <ul style="list-style-type: none"> • 2021 Hunt: 13.00 hours • 2021 Morris: 2.50 hours

	<p><u>Proposed Decision Denying a Petition for Modification of D.10-12-048 (6.50 hours reduced)</u></p> <p>GPI claimed 6.50 hours for Hunt’s and Morris’ work on the Proposed Decision Denying a Petition for Modification of D.10-12-048. Their work included reviewing the Proposed Decision, drafting comments, and reviewing other parties’ comments. The work that GPI claims here cannot be verified as they do not appear on the docket as having been filed. Further, GPI does not mention these comments in Part II.A or in their list of pleadings in Attachment 2. We therefore reduce all 6.50 hours GPI claimed on this Proposed Decision for lack of substantial contribution to the decision-making process, which breaks down as follows:</p> <ul style="list-style-type: none"> • 2022 Hunt: 5.50 hours • 2022 Morris: 1.00 hour <p><u>Resolution E-5227 (3.75 hours reduced)</u></p> <p>GPI claimed 3.75 hours for Hunt’s 2022 work on Resolution (Res.) E-5227. Hunt’s work included reviewing the draft Resolution, reviewing related documents, and drafting comments on the Resolution. GPI fails to provide any justification for why its work on the Resolution substantially contributed to this proceeding in Part II.A. This Resolution also does not appear in any of the Decisions GPI is claiming substantial contribution for and the comments on the Resolution are not included in GPI’s list of pleadings in Attachment 2. We therefore find it reasonable to reduce all of Hunt’s 3.75 claimed hours on Res. E-5227 for lack of substantial contribution to the decision-making process.</p>
<p>[7] Lack of Substantial Contribution to Resolution E-5216</p>	<p>GPI did not make a substantial contribution to Res. E-5216, nor did it enrich the record to better inform the Commission with regards to the outcomes that resulted from Res. E-5216. We do not find anywhere where GPI provided comments on Res. E-5216 or submitted a protest or response to the Advice Letters that were at issue in the Resolution. Additionally, none of the arguments, positions, advice, or requests advanced by GPI in their claimed contribution in Part II.A were at issue or were topics raised for discussion in Res. E-5216. The arguments and positions that GPI provides here as claims relate to the overall policy for how the VAMO process impacts the RPS program and RPS procurement and provide an opinion on how a certain RPS product (PCC 0 renewable energy credit (REC)) should be treated with regards to VAMO. We do not find that GPI has requested compensation for its work on Res. E-5216, therefore no reductions are needed.</p>
<p>[8] Reductions for Excessive Hours</p>	<p>The length of a document does not always indicate its depth, substance, and impact. The reductions made here are not based on the length of the document, but due to inefficiencies and the excessive time spent producing it. GPI requested compensation for their work on 16 documents in Attachment 2. After reviewing GPI’s submitted timesheet, we find that the 319.75 hours requested in relation to 11 of those documents to be excessive by 191.50 hours, as explained below:</p>

	<p><u>Comments of GPI in Response to the Ruling Requesting Comments on the Staff Proposal (2.00 hours reduced)</u></p> <p>GPI claimed 9.00 hours for Morris’ 2020 work on their Comments of GPI in Response to the ALJ’s Ruling Requesting Comments on Confidentiality that was filed on October 9, 2020. This work consisted of two timesheet entries on October 8 and 9, 2020, with the same description of: “Draft comments on RPS/IRP integration staff proposal.” We find GPI’s claimed hours to be unreasonably excessive for the three and one-half pages of substantial work product produced. We therefore find it reasonable to reduce 2.00 hours from Morris’ 2020 work.</p> <p><u>Comments of GPI on the 2021 Draft Renewables Portfolio Standard (RPS) Plans (60.00 hours reduced)</u></p> <p>GPI claimed 97.75 hours for Harrold’s and Morris’ 2021 work on their Comments of GPI on the 2021 Draft RPS Plans that was filed on July 30, 2021. This work included attending a workshop on the RPS template, reviewing RPS procurement plans, and drafting the Comments. We find GPI’s claimed hours to be unreasonably excessive for the 20 pages of substantial work product produced. We therefore reduce 60.00 hours of Harrold’s and Morris’ 2021 work, which breaks down as follows:</p> <ul style="list-style-type: none"> • 2021 Harrold: 50.00 hours • 2021 Morris: 10.00 hours <p><u>Reply Comments of GPI on the 2021 Draft RPS Plans (3.00 hours reduced)</u></p> <p>GPI claimed 7.75 hours for Harrold’s and Morris’ 2021 work on their Reply Comments of GPI on the 2021 Draft RPS Plans filed on August 9, 2021. This work included reviewing compliance reports and “comments on RPS procurement plans” as well as drafting their Reply Comments. We find GPI’s claimed hours to be unreasonably excessive for the two and one-half pages of substantial work product produced. We therefore reduce 3.00 hours of Harrold’s and Morris’ 2021 work, which breaks down as follows:</p> <ul style="list-style-type: none"> • 2021 Harrold: 2.00 hours • 2021 Morris: 1.00 hours <p><u>Comments of GPI on the Proposed Decision and Alternate Proposed Decision (4.50 hours reduced)</u></p> <p>GPI claimed 6.50 hours for Harrold’s and Morris’ 2021 work on their Comments of GPI on the Proposed Decision and Alternate Proposed Decision that was filed on October 6, 2021. This work included reviewing and drafting comments on the Proposed Decision and the Alternate Proposed Decision. We find GPI’s claimed hours to be unreasonably excessive for the one page of substantial work product produced. We therefore reduce 4.50 hours of Harrold’s and Morris’ 2021 work, which breaks down as follows:</p> <ul style="list-style-type: none"> • 2021 Harrold: 2.00 hours • 2021 Morris: 2.50 hours <p><u>Comments of GPI on the Proposed Decision on the 2021 RPS Procurement Plans (15.00 hours reduced)</u></p>
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	<p>GPI claimed 23.50 hours for Harrold’s and Morris’ 2021 work on their Comments of GPI on the Proposed Decision on the 2021 RPS Procurement Plans that was filed on December 30, 2021. This work included reviewing filings, reviewing the Proposed Decision, and drafting their Comments. We find GPI’s claimed hours to be unreasonably excessive for the four pages of substantial work product produced. We therefore reduce 15.00 hours from Harrold’s and Morris’ 2021 work, which breaks down as follows:</p> <ul style="list-style-type: none"> • 2021 Harrold: 9.00 hours • 2021 Morris: 6.00 hours <p><u>Comments of GPI on the Ruling Seeking Comments on the Voluntary Allocation of RPS Resources (25.00 hours reduced)</u></p> <p>GPI claimed 36.50 hours for Harrold’s and Morris’ 2022 work on their Comments of GPI on the Ruling Seeking Comments on the Voluntary Allocation of RPS Resources that was filed on April 28, 2022. This work included reviewing the proceeding’s scoping memo, reviewing rulings and a decision related to Voluntary Allocation Market Offers (VAMO), “Review of docs re VAMO”, internal communications, and drafting their Comments. We find GPI’s claimed hours to be unreasonably excessive for the six pages of substantial work product produced. We therefore reduce 25.00 hours of Harrold’s and Morris’ 2022 work, which breaks down as follows:</p> <ul style="list-style-type: none"> • 2022 Harrold: 14.00 hours • 2022 Morris: 11.00 hours <p><u>Comments of GPI on the Proposed Decision Establishing Rules for Portfolio Content Category Classification for Voluntary Allocations of RPS Resources (7.50 hours reduced)</u></p> <p>GPI claimed 15.25 hours for Harrold’s and Morris’ 2022 work on their Comments of GPI on the Proposed Decision Establishing Rules for Portfolio Content Category Classification for Voluntary Allocations of RPS Resources that was filed on June 3, 2022. This work included reviewing comments on VAMO issues, internal communications, reviewing the Proposed Decision, and drafting their Comments. We find GPI’s claimed hours to be unreasonably excessive for the four pages of substantial work product produced. We therefore reduce 7.50 hours of Harrold’s and Morris’ 2022 work, which breaks down as follows:</p> <ul style="list-style-type: none"> • 2022 Harrold: 4.00 hours • 2022 Morris: 3.50 hours <p><u>Comments of GPI on the 2022 RPS Procurement Plans – Market Offer Process (5.00 hours reduced)</u></p> <p>GPI claimed 8.75 hours for Harrold’s and Morris’ 2022 work on their Comments of GPI on the 2022 RPS Procurement Plans – Market Offer Process filed on June 3, 2022. This work included reviewing documents related to the market offer process, reviewing a webinar, and drafting their Comments. We find GPI’s claimed hours to be unreasonably excessive for the two pages of substantial work product produced. We therefore reduce</p>
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	<p>5.00 hours of Harrold’s and Morris’ 2022 work, which breaks down as follows:</p> <ul style="list-style-type: none"> • 2022 Harrold: 3.50 hours • 2022 Morris: 1.50 hours <p><u>Comments of GPI on the 2022 Draft RPS Procurement Plans (60.00 hours reduced)</u></p> <p>GPI claimed 97.50 hours for Harrold’s and Morris’ 2022 work on their Comments of GPI on the 2022 Draft RPS Procurement Plans that was filed on August 1, 2022. This work included preparing for and attending a webinar, reviewing RPS and LSE procurement plans, reviewing D.22-06-034, internal communications, and drafting their Comments. We find GPI’s claimed hours to be unreasonably excessive for the 19.50 pages of substantial work product produced. We therefore reduce 60.00 hours of Harrold’s and Morris’ 2022 work, which breaks down as follows:</p> <ul style="list-style-type: none"> • 2022 Harrold: 50.00 hours • 2022 Morris: 10.00 hours <p><u>Reply Comments of GPI on the 2022 Draft RPS Procurement Plans (2.00 hours reduced)</u></p> <p>GPI claimed 5.00 hours for Morris’ 2022 work on their Reply Comments of GPI on the 2022 Draft RPS Procurement Plans that was filed on August 15, 2022. This work included reviewing other parties’ comments and drafting their Reply Comments. We find GPI’s claimed hours to be unreasonably excessive for the one and one-half pages of substantial work product produced. We therefore reduce 2.00 hours from Morris’ 2022 work.</p> <p><u>Comments of GPI on the Proposed Decision on the 2022 RPS Procurement Plans (7.50 hours reduced)</u></p> <p>GPI claimed 12.25 hours for Harrold’s and Morris’ 2022 on their Comments of GPI on the Proposed Decision on the 2022 RPS Procurement Plans that was filed on November 29, 2022. This work included reviewing proceeding filings, reviewing the Proposed Decision, and drafting their Comments. We find GPI’s claimed hours to be unreasonably excessive for the two and one-half pages of substantial work product produced. We therefore reduce 7.50 hours of Harrold’s and Morris’s 2022 work, which breaks down as follows:</p> <ul style="list-style-type: none"> • 2022 Harrold: 1.00 hours • 2022 Morris: 6.50 hours
<p>[9] Excessive Intervenor Compensation Claim Preparation Hours</p>	<p>Of utmost importance in this review is GPI’s failure to list the documents which were submitted to the Commission in support of its claim of substantial contribution. Section 2a ii of the Intervenor Compensation Program Guide at 20, states that intervenors “must support each of its claimed contributions with both a citation to the specific portions of documents filed in the proceeding or reporter’s transcript reflecting the intervenor’s testimony/arguments, and a citation to the specific portion of the CPUC’s order or decision indicating that the CPUC has adopted on whole or</p>

	<p>part your contentions or recommendations. Citations must include the referenced document’s name, date, and page/portion(s).”</p> <p>GPI’s failure to comply with the Intervenor Compensation Program Requirements requires the Commission to do the work for the Intervenor by reading the pleadings and matching them with the substantial contribution claims. D.21-03-042 repeatedly admonished GPI about its failure to provide specific references to both its documents and citations to the final decision in Part II.A Columns 1 and 2 to support its claim of substantial contribution. Additionally, we note that there were several issues with the claim, including omission of required information, unclear or inconsistent details, and other inconsistencies that hindered the Commission’s ability to evaluate and resolve the claim.</p> <p>Given GPI’s continued failure to adhere to these requirements, GPI’s long-standing practice before the Commission, and Morris’ experience in Intervenor Compensation Claim Preparation, we reduce Morris’ Intervenor Compensation Claim Preparation time by 9.00 hours, or 50% of the 18.00 hours.</p>
<p>[10] Disallowance of Excess Compensation Exceeding Actual Consultant Costs</p>	<p>Upon closer review of the Associate Service Agreement Addendums, we find that the compensation GPI is requesting for the consultants’ time significantly exceeds the actual rate and compensation the consultants would receive under the contract terms.</p> <p>The Intervenor Compensation Program is funded by ratepayers and is intended to reimburse reasonable costs of participation rather than generate profit from outsourced consultant services. As established in D.07-01-009, D.08-04-010, and Resolution ALJ-235, the rate requested by an intervenor must not exceed the actual rate billed by the consultant.²³ Because the consultants has agreed to be paid a percentage of the Commission approved rate and hours, the requested compensation in this claim does not accurately reflect the actual cost of the consultants’ services. Compensating GPI the full request would result in an overpayment with the remaining balance retained by Morris, dba Future Resources Associates, instead of covering the consultants’ actual fees. Therefore, in instances where compensation to the intervenor for the consultants’ time exceeds the amount the intervenor will actually pay the consultants under their contract terms, the Commission will reduce the award to match the actual cost incurred.</p> <p>Here, we reduce the award by \$712.20 to ensure that the amount awarded in this claim for the consultants’ services aligns with the actual compensation terms established in the Associate Service Agreement Addendums. Because the Associate Service Agreement Addendums between Future Resources Associates and the consultants were filed under seal, we do not disclose here how the reductions are specifically calculated.</p>

²³ D.07-01-009 at 5, D.08-04-010 at 5, and Resolution ALJ-235 at 4.

<p>[11] Intervenor Responsibility for Transparency and Accuracy in Compensation Requests</p>	<p>The Commission takes this opportunity to remind all intervenors that they bear the burden of providing accurate, complete, and honest information in all compensation requests. The Commission relies on intervenors' good faith representations, particularly regarding consultant agreements and payments, as it does not have the resources to review every contract or non-standard arrangement in detail.</p> <p>Intervenor compensation is funded by ratepayers, and the Commission takes seriously any effort to mislead or obscure the financial basis for a claim. We remind intervenors that under Rule 1.1, intent to deceive is not required for a violation, misstatements may still be actionable. Dishonest or misleading claims not only risk denial of compensation but may also subject the intervenor to penalties.</p> <p>The Commission has clear authority to audit intervenors' books and records to verify the basis for any award. Intervenor must therefore ensure full transparency regarding actual time spent on issues, consultant fees, payment arrangements, and the actual disbursement of funds. Failure to meet this obligation undermines the integrity of the compensation process and may lead to denial of claims or further enforcement action.</p>
<p>Other Comments</p>	<p>The Commission finds the deficiencies in this filing to be concerning and expects a higher standard of transparency and diligence moving forward. The submission was not only missing essential documentation but also contained misleading information regarding consultant terms, missing invoices, and errors throughout. This resulted in inefficient use of the intervenor's own time and an undue burden on Commission staff resources to reconcile these errors. Please be advised that future claims lacking necessary supporting evidence will be assessed solely on the information provided; if the Commission cannot verify portions of the claim, those portions may be denied ensuring the program operates efficient for all participants.</p>

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))

<p>A. Opposition: Did any party oppose the Claim?</p>	<p>No</p>
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<p>B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?</p>	<p>No</p>
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If not:

<p>PARTY</p>	<p>COMMENT</p>	<p>CPUC DISCUSSION</p>

FINDINGS OF FACT

1. Green Power Institute has made a substantial contribution in some aspects to D.21-11-029, D.21-12-032, D.22-01-004, D.22-06-034, D.22-11-021, and D.22-12-030.
2. Green Power Institute did not make a substantial contribution to Resolutions E-5209 and E-5216.
3. The requested hourly rates for Green Power Institute's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services, and/or reflect the actual rates billed to, and paid by the intervenor, for consultant services rendered.
4. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
5. The total of reasonable compensation is \$70,197.80.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§1801-1812.
2. Green Power Institute did not make a substantial contribution to Resolutions E-5209 and E-5216.

ORDER

1. Green Power Institute is awarded \$70,197.80.
2. Within 30 days of the effective date of this decision, Bear Valley Electric Service, a division of Golden State Water Company, Liberty Utilities, LLC, Pacific Gas and Electric Company, PacifiCorp, San Diego Gas & Electric Company, and Southern California Edison Company shall pay Green Power Institute their respective shares of the award, based on their California-jurisdictional electric revenues for the 2021 calendar year, to reflect the year in which the proceeding was primarily litigated. If such data is unavailable, the most recent 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 April 26, 2023, the 75th day after the filing of Green Power Institute's request, and continuing until full payment is made.
3. The comment period for today's decision is not waived.

This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D2111019, D2112032, D2201004, D2206034, D2211021, and D2212030		
Proceeding:	R1807003		
Author:	ALJ Nilgun Atamturk and ALJ Zita Kline		
Payees:	Bear Valley Electric Service, a division of Golden State Water Company, Liberty Utilities, LLC, Pacific Gas and Electric Company, PacifiCorp, San Diego Gas & Electric Company, and Southern California Edison Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Green Power Institute	2/10/2023	\$196,305 ²⁴	\$70,197.80	N/A	See Part III D. CPUC Comments, Disallowances, and Adjustments

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Gregg	Morris	Expert ²⁵	\$335.00	2020	\$335.00
Gregg	Morris	Expert	\$450.00	2021	\$450.00
Gregg	Morris	Expert	\$465.00	2022	\$465.00
Zoë	Harrold	Expert ²⁶	\$280.00	2021	\$225.00
Zoë	Harrold	Expert	\$285.00	2022	\$250.00
Tamlyn	Hunt	Attorney ²⁷	\$460.00	2020	N/A
Tamlyn	Hunt	Attorney	\$585.00	2021	\$475.00
Tamlyn	Hunt	Attorney	\$605.00	2022	\$605.00
Rebecca	Davis	Attorney ²⁸	\$360.00	2020	N/A
Rebecca	Davis	Attorney	\$475.00	2021	\$475.00

(END OF APPENDIX)

²⁴ The corrected amount of the requested award (without rounding) is \$198,927.00.

²⁵ Morris is a consultant as discussed in Part III.D [1].

²⁶ Harrold is a consultant as discussed in Part III.D [2].

²⁷ Hunt is a consultant as discussed in Part III.D [3].

²⁸ Davis is a consultant as discussed in Part III.D [4].