

Decision 18-08-009 August 9, 2018

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

Application of San Diego Gas & Electric Company (U902E) for Approval of SB 350 Transportation Electrification Proposals.	Application 17-01-020
And Related Matters.	Application 17-01-021 Application 17-01-022

**DECISION GRANTING COMPENSATION TO SAN DIEGO AIRPORT PARKING COMPANY FOR SUBSTANTIAL CONTRIBUTION TO DECISION 18-01-024**

Intervenor: San Diego Airport Parking Company (SDAP)	For contribution to Decision (D.) 18-01-024
Claimed: \$38,397.00	Awarded: \$34,400.60
Assigned Commissioner: Carla Peterman	Assigned Administrative Law Judges: Michelle Cooke and Sasha Goldberg

**PART I: PROCEDURAL ISSUES:**

A. Brief description of Decision:	<p>In this proceeding, SDG&amp;E, PG&amp;E and SCE, submitted proposals regarding their Priority Review Transportation Electrification Projects and associated budgets of funding limits of \$20 million dollars for each of the investor-owned utility’s (IOU’s) to complete the pilot projects.</p> <p>These proposals included required TE pilots that would carry out various proposed EV projects that would be non-controversial, short term 1-year investments and could accelerate adoption of electric vehicles for commercial MHD fleets and for Light Duty vehicles (LDA).</p> <p>The approval of the Priority Review Projects continues the efforts to support SB350 and proceeding 13-11-007 and the larger Standard Review Projects remain open with a decision expected in May 2018.</p> <p>The Priority Review (PR) proposals were to include required best cost and best benefit effectiveness for each IOU’s individual pilot projects, achieve pollution reduction benefits and grid management integration, using</p>
-----------------------------------	---

	<p>renewable or non-renewable technologies with the lowest pollutants or zero pollutants and the overall portfolio of programs should experiment with diverse market segments and promote benefits to low income and disadvantaged communities, increase the access of electricity as a transportation fuel and deployment should integrate renewable generation, programs are not to unfairly compete with non-utility enterprises and can implement a reasonable cost recovery mechanism and are to be in the interest of ratepayers.</p> <p>In addition, the Commission requested during the proceeding that parties provide feedback on the proposals as to the Consolidation of the Applications and one of the objectives is to understand whether the proposals can be expanded upon in the future to develop the TE market and to advance the use of renewables through grid integration. The Commission established the scope of issues regarding the TE programs, as well as the need for modifications to be considered and to address the rate design issues targeting mandatory vs optional participation and demand charges.</p> <p>The decision issued by the Commission in this proceeding addresses each of these issues. The issues that SDAP raised regarding consolidation was that many fleets are not just in one service territory and that many of the TE policies will impact all projects and therefore all parties can benefit from consolidation without having to have additional burdens administratively to participate in multiple proceedings. SDG&amp;E's proposed Green/Taxi/Shuttle/Rideshare program and rates, which included the best cost and best benefit effectiveness of SDG&amp;E's program and portfolio that is projected to assist in accelerated adoption in the shortest period of time and to fulfill the direction to target entities with high utilization and that will result in the highest pollutant reductions and whereby when implemented these fleets can act in the quickest period of time and together adequately are the best fit for TE technology adoption due to the current requirements of the fleets duty cycle and the nature of the fleets daily vehicle miles traveled (VMT) and thereby it can be established that the fleets in the proposed projects are best aligned to achieve a benefit, provide the data to help understand the charging needs that are best for the fleet and has the potential to be installed without any concern for deploying stranded assets of infrastructure. Modifications were to be addressed if the parties found that the applications do not adequately best reflect the fleets with the most potential to inform the future of all electric fleet vehicles that would have the potential for the most positive impact not just in the project service territory or the customers service territory but also throughout California.</p>
--	---

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	3-16-17	Verified
2. Other specified date for NOI:	6-27-17 (Amended NOI)	Verified
3. Date NOI filed:	4-17-17	Verified
4. Was the NOI timely filed?		Yes
<b>Showing of eligible customer status (§ 1802(b)):</b>		
5. Based on Administrative Law Judge (ALJ) LJ ruling issued in proceeding number:	17-01-020	A ruling of May 25, 2017 on San Diego Airport Parking’s (SDAP) NOI directed SDAP to complete the showing of customer status in the amended NOI, by providing additional information. On June 27, 2017, SDAP filed an amended NOI. See CPUC’s discussion of SDAP’s showing of customer status in Part I(C)(1), below.
6. Date of ALJ ruling:	5-25-17	
7. Based on another CPUC determination (specify):		This decision finds that SDAP has demonstrated eligible customer status. See CPUC’s discussion of SDAP’s showing of customer status in Part I(C)(1), below.
8. Has the Intervenor demonstrated customer status?		Yes. See CPUC’s discussion in Part I(C)(1), below.
<b>Showing of “significant financial hardship” (§1802(h) or §1803.1(b))</b>		
9. Based on ALJ ruling issued in proceeding number:	17-01-020	A ruling of May 25, 2017, on SDAP’s NOI directed SDAP to support the showing of significant financial hardship in the amended NOI or an intervenor compensation claim, by providing additional documents and information. On June 27, 2017, SDAP filed an amended NOI. See CPUC’s discussion of the showing of significant financial hardship in Part I(C)(1), below.
10. Date of ALJ ruling:		
11. Based on another CPUC determination (specify):		See CPUC’s discussion of significant financial hardship in Part I(C)(1), below.

12. Has the Intervenor demonstrated significant financial hardship?		Yes. See CPUC’s discussion of significant financial hardship in Part I(C)(1), below.
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.18-01-024	Verified
14. Date of issuance of Final Order or Decision:	1-11-2018	1/17/2018
15. File date of compensation request:	3-19-2018	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	<b>I. Intervenor’s Comments</b>
	<p>As San Diego Airport Parking Company (SDAP) became interested in these proceedings (CPUC SB350), Lisa McGhee, its Operations Manager, began participating in the many new regulatory changes and educational opportunities and workshops offered by the State Agencies and its affiliates. Numerous trips, meetings, seminars and workshops have been attended by SDAP in the course of the last 24 months in preparation for ensuring fleet reliability and to share fleet experiences in commercial operations that have high demand vehicle miles traveled --- the technology must fit the demand and needs of the vocation and be a reliable transportation technology source and SDAP has a desire help pave the way for others as many of these proceedings have yet to include participation by fleets. The cost of this participation was borne entirely from the normal business proceeds of SDAP and Lisa McGhee has deferred the majority of the time and hours spent that are beyond the normal number of hours that Ms. McGhee delivers weekly to the operations of the business of SDAP; as such, Ms. McGhee’s deferral has been agreed upon until after the claim is determined in order to help support the participation for SDAP.</p> <p>SDAP has been a local small private business fleet operator since 1991. SDAP also procured 3 electric shuttles in 2015 and by the end of 2016 all 3 shuttles have remained non-operational as the OEM does not have a fix for the airport user and has refused any warranty support to SDAP; as such, we have been paying \$5,000 per month for over one year for vehicles that do not run that are a long term liability obligation to SDAP and a large monthly payment that SDAP has budgeted as being an asset on the books that would help to generate revenue; but that is currently not the case. In the last 30 days from this filing SDAP had to</p>

request a financial hardship waiver on the three vehicles with the equipment finance company in order to support the business through it's slow season which is January to April 15 annually. Nonetheless, SDAP has managed to remain successful in meeting all of its business financial obligations and this has been in large part because of the sound financial management practices of its Operations Manager, Ms. Lisa McGhee and her passion and support of small private business.

An attached income statement indicates clearly the expenses that SDAP incurred during the course of its normal operations in calendar year 2017 (shown in a monthly format), the Balance Sheet for 2017 shows limited net proceeds would be available for the level of commitment and costs and time that participation in this proceeding requires. However, as the company's participation in the electrification process has increased, and promises to increase even more in the near future, so will the motivation of SDAP as capital investment in TE is substantially more than other more conventional technologies and choices. SDAP has been a pioneer in the electrification industry, to not only avail itself of all future programs, but also to avail itself of opportunities to upgrade its operations by mobilizing a fully electric fleet along with the infrastructure and employee training needed to operate it. SDAP sees the TE as a great option for their short duty cycle and use; however, the risk is high with all equipment being proprietary and with no real-world data to determine the useful life. Currently, in San Diego, per the HVIP data website, San Diego has only 9 HVIP vouchers that have been distributed in San Diego for ZEV's since the start of the program in 2009 and SDAP has 3 of them.

In light of these future estimated expenditures, and the current state of SDAP's downturn in annual proceeds due to supporting the non-functional three ZEV's, the financial commitment to these proceedings, the recent negative impact by the TNC industry -- along with all of these new regulatory measures to adopt ZEV's over other transportation alternatives, SDAP forecasts that it will not be able to afford the costs of effective participation in these and future proceedings without undue hardship; accordingly, SDAP is grateful for the opportunity to file this claim. All expenses shown on the provided expense time table are hard costs, as provided to SDAP by its vendors.

Ms. McGhee, who is the driving force of SDAP's participation in these proceedings, has managed most of the time to these proceedings and drafting of documents, coordinated filings etc. as SDAP has not directly hired additional staff to take on the more skilled requirements or it has been very limited. Ms. McGhee as operations manager of SDAP over the last several years has supported SDAP at a pay rate far less than what the market could offer her elsewhere. Partly due to her desire to propel SDAP into the future as a model participant in the vehicle TE electrification space and to overcome the hardship that the ZEV OEM has created on SDAP; moreover, Ms. McGhee's, rate of \$100 per hour is justified as a modest hourly rate and is at the low end of other participating intervenors that are advocates with approved rates. Ms. McGhee's expertise, which is equivalent to

	<p>that of other expertise according to the Guide’s Hourly Rate table. We are exercising adherence to form over substance with respect to her value in these proceedings.</p> <p>Should SDAP be awarded this intervenor compensation, the funds would be deposited back into SDAP’s accounts to continue participation in the CPUC’s electrification program as currently SDGE has filed application 18-01-012 for TE in the Class 2b-Class 8 commercial vehicle fleet operations and this will have an impact on the transportation industry and needs to be a program that reaches other fleets and supports the business vocation and ratepayers of San Diego.</p>
<p><b>II. CPUC Discussion</b></p>	
<p><b>1. Eligibility to Claim Intervenor Compensation</b></p>	
<p>Part I(B), Items 5-8, above</p>	<p><b>Customer Status.</b> SDAP claims that it is a “customer” pursuant to Section 1802(b)(1)(A). Section 1802(b)(1)(A) defines a customer as “a participant representing consumers, customers, or subscribers of any electrical, gas, telephone, telegraph, or water corporation that is subject to the jurisdiction of the Commission.” Such “participant” is an “actual customer who represents more than his own narrow self-interest; a self-appointed representative.”<sup>1</sup> SDA Phas explained its own economic interest in the outcomes of this proceeding. SDAP has also shown that it advocates on behalf of the similar economic interests of other SDG&amp;E customers operating as San Diego International Airport’s ground transportation commercial fleet operators interested in investing in and acquiring, zero emission vehicles. In support of its claim, SDAP presented a copy of the utility bill demonstrating that this small local business is an actual customer of San Diego Gas &amp; Electric Company (SDG&amp;E). This decision finds that SDAP has demonstrated its status as a <i>customer</i> pursuant to Section 1802(b)(1)(A).</p>
<p>Part I(B), items 9-12, above</p>	<p><b>Significant Financial Hardship.</b> Section 1802(h) states that “‘significant financial hardship’ means . . . that the customer cannot afford, without undue hardship, to pay the costs of effective participation.” To support its claim of undue hardship, SDAP provides its most recent income and expense statement, end-of-the year balance sheet, and CALSTART Commercial Electric Vehicle Working Group agreement dated May 31, 2016. These documents support SDAP’s claim of undue hardship. This decision finds that SDAP has met the definition of significant financial hardship by demonstrating that it cannot afford, without undue hardship, to pay the costs of effective participation in this proceeding. This finding creates a rebuttable presumption of eligibility for compensation in other Commission proceedings commencing within one year of the date of the finding (Section 1804(b)).</p>

<sup>1</sup> D.98-04-059 at 30.

**2. Motion for Leave to File Confidential Documents Under Seal**

Pursuant to the Ruling of May 25, 2017, SDAP filed financial documents supporting its required showing of significant financial hardship on March 19, 2018. Pursuant to Rule 11.4 SDAP requests leave to file its financial documentation under seal. The financial information includes: Income Statement; Balance Sheet; and a Cal Start Electric Vehicle (EV) Working Group Agreement. No party filed an opposition to the motion.

The information marked as “confidential” is of the type that is not commonly made public and which, if made public, could subject SDAP to an unfair business disadvantage. We have granted similar requests in the past, and do so here.

SDAP’s March 19, 2018 Motion to file its financial documentation under seal is granted for a period of three years from the effective date of this decision. During this three-year period, this information shall not be publicly disclosed except on further Commission order or Administrative Law Judge ruling. If SDAP believes it is necessary for this information to remain under seal for longer than three years, SDAP may file a new motion showing good cause for extending this order by no later than 30 days before the expiration of this order.

**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>Summary</p> <p>1. <u>Consolidation</u>: At the onset of the prehearing, the first item to discuss in the three IOU’s proceedings were arguments against consolidation. SDAP offered support for consolidation as many of the programs would be impacted by the same common issues and parties could benefit from consolidation both administratively including the parties shared common objectives, benefits, interest and barriers. Including that</p>	<p>Specific references to SDAP’s contributions to this case are provided in subsequent rows of this table.</p> <p>1) <u>SDAP Comments at Pre-Hearing 3-16-17</u> <u>SDAP Response 3-6-17, pp. 3</u> <u>D. 18-01-024 pp 5</u></p> <p>2) <u>SDAP Response 3-6-17, pp. 4-7</u></p> <ul style="list-style-type: none"> <li>➤ Shuttle are in fixed routes</li> <li>➤ Have high vmt</li> </ul>	<ol style="list-style-type: none"> <li>1. Verified</li> <li>2. Verified</li> <li>3. Verified</li> <li>4. Verified</li> <li>5. Verified</li> </ol>

<p>some fleets are domiciled in more than one service territory and will require fueling infrastructure in several service territories. It was determined the applications were to be consolidated to support administrative cost, questions of law, fact and policies.</p> <p>2. <u>LDA Rideshare Vehicle Cost Effectiveness over Shuttles:</u>          In this PR proceeding SDG&amp;E proposed the Green/Taxi/Shuttle/Rideshare program (GTSRP) with a new dynamic GIR Public Rate that will require enrollment by all parties and the Taxi and TNC drivers when at home are required to enroll in the residential GIR rate. The program proposed to include Taxi and Rideshare vehicles (Transportation Network Company’s “TNC’s” are considered rideshare vehicles like an Uber or Lyft driver), this proposal was unique among the three IOU’s in that the proposed program included a new dynamic rate, included \$10,000 per EV for a Taxi or Shuttle and fueling incentives for both Taxi and TNC’s. SDGE’s proposal expressed support by the Taxi companies and added that the TNC rideshare drivers once exposed would gain confidence about the benefits of TE. SDGE’s lack of current EV fleet experience proposed LDA vehicles for TE that were not the best fit for a benefit and included rideshare fleets that could be asked to drive anywhere from a few miles to over 100 miles when hailed for a ride which</p>	<ul style="list-style-type: none"> <li>➤ Short duty cycle driving behaviors that constantly and consistently repeat 24 hours per day</li> <li>➤ Returns to depot with short trips</li> <li>➤ Scalable across all airports</li> </ul> <p>D. <u>18-01-024 pp 35</u>  <u>SDAP Opening Brief at 5</u>  <u>SDAP Opening Brief at 6</u>          Taxi and Uber drivers will not access the same cost effectiveness over shuttles or larger GVW shuttle operations.</p> <p>3)  <u>SDAP Opening Brief at 6</u>          SDAP states to target fleets in fixed routes in order to avoid stranded assets.</p> <p>4) <u>SDGE Concept Meeting 12-1-16</u>          Meeting with Hannon Rasool, Linda Brown, Envision Solar, SDAP, Energetics, Greenlots and Phoenix Motorcars. This concept was created by and includes a coordinated team of experts in the industry that SDAP collaborated with to design a turnkey solution to help support optimization for fleet charging with advanced non-grid charging and grid charging. The concept idea was shared with SDGE to allow the SDGE team to support the concept in their PR project and it would directly support and benefit fleets with high VMT such as all airport</p>	
---	--	--

<p>may not be achieved in all EV's vehicles and specifically for a round trip plus many of the taxi and TNC vehicles already meet the requirements of the GHG mandates at the airport and thereby are currently driving vehicles that achieve an attractive cost per mile benefit in a Hybrid vehicle and essentially these two sectors and modes of transportation are not facing the level of barriers that MHD shuttles face and thereby shuttles are a sector that already creates high emissions and moves multiple people at one time in a vehicle with 10-20 seats verses a taxi or a TNC that on average has one customer in the vehicle. Transformation for EV adoption is not a priority for the Taxi and Independent TNC drivers the same as it is with shuttles operations that can benefit and are facing proposed statutory mandates to procure EV shuttles when supporting ground transportation at airports. In the decision the project was modified to focus solely on shuttle services that are in fixed destinations, like hotels to airports or parking lots to transportation hubs.</p> <p>3. <u>Stranded Assets</u>: Furthermore, SDGE's proposal to install infrastructure at homes lacks cost effectiveness as there is not the option to share the installed EVSE nor is there a guarantee that the driver will remain in the business or keep the EV as this individual is an independent contractor, and thereby this is not in the best interest of ratepayers as this</p>	<p>shuttle operations. The idea was ripe for shuttles, for a pilot, for data collecting and when deployed will achieve a result with benefits. All experts are closely aligned and committed to the concept and benefits that it achieves and this meeting had all parties present and was very productive and SDGE agreed to support a solar array with battery storage in its PR proposal.</p> <p><u>D. 18-01-024 pp 36</u></p> <p>Installing and supporting a program for Shuttle Rideshare fleets with Managed Charging by Renewable integration of Solar and Battery Storage.</p> <p>5)</p> <p><u>D. 18-01-024 pp 34-36 and 41-43</u></p> <p>SDGE is directed to work with pilot participants to meet the needs of the shuttle companies and the GIR rate design is unnecessarily complex. SDGE did make modifications based on parties comments and the SR will determine the Commercial GIR Rate.</p> <p><u>SDAP Opening Brief at 7-9</u></p> <p>SDAP provided depicted of use cases similarly to SDAP that could demonstrate that commercial EV operations will not avoid peak time charging and or the adder event fees. The hourly daily rate is complex and does not provide a benefit cost per mile; however, SDGE stated</p>	
---	---	--

<p>could create stranded assets which can potentially be to the detriment of ratepayers and given that the priority to achieve benefits should be geared towards operators that can leverage the technology with a benefit from high utilization and could have the potential to share the infrastructure.</p> <p>4. <u>Renewable Integration:</u>          Furthermore, SDAP proposed the Solar Array and Battery storage site concept to SDGE which the decision supported one site for the program. The renewable integration and infrastructure reduces the load on the grid, reduces emissions, reduces rates and includes the advanced technology which supports managed charging, reduced installation costs and can assist fleet demand use with optimized charging from the renewable integration while ensuring support to the fleet as the infrastructure establishes an emergency back up energy hub.</p> <p>5. <u>GIR Rates:</u>          Two new rates were introduced in the PR programs. The proposed Public and Commercial GIR Rates. The Commercial GIR (CGIR) is a proposed rate for the fleet delivery and Public Highway PR projects. The CGIR established a high monthly GIR fee along with two dynamic adders fees, the proposed GIR rates with high monthly fees had little support by the parties and would have increased rates for transportation fleets beyond</p>	<p>on page 10 that the GIR provides pricing for charging needs irrespective of miles driven.</p>	
--	--	--

<p>the displaced diesel fuel cost per mile and would have negative operational cost to the fleets; moreover, fleets with high VMT will never avoid high monthly GIR fees and the higher kWh dynamic adders fees as the fleet driver cannot schedule around the hourly rates as the daily VMT will go beyond the range of the EV vehicle determining that the EV vehicle requires charging through out the day as the reserve is slowly depleting and thereby when plugging in multiple vehicles at the same time, this will increase the GIR base fee as it determined by the amount of kW used by the fleet at one time. All of this was detrimental to the fleet operator, does not support having an operational benefit, was confusing as the rate is dynamic every hour and could negatively impact fleet adoption as the conventionally fueled vehicles cost per mile is less than electric GIR rates proposed.</p>		
---	--	--

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

	Intervenor's Assertion	CPUC Discussion
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?	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: NA		N/A
d. Intervenor's claim of non-duplication: While SDAP and other parties shared certain interests in this		Noted

proceeding and each addressed the IOUs' cost-effectiveness benefits and GIR rates, SDAP covered issues specific to SDG&E that only SDAP as a fleet customer user was capable of addressing as SDAP has been the only individual small commercial business customer party that was representing their own interest as a business customer in the SDGE service territory and is also supporting other small fleet users and EV fleet adopters and is the only active fleet operator and party with actual EV early adoption fleet experience and that includes procuring 3 EV shuttle buses that began operation in 2015, installed 3 EVSE commercial Level 2 chargers that delivery 14 kW each and has an EV operational experience with over 100,000 EV VMT by its fleet operation that is open 24/7 and travels 20,000 miles per month as a small fleet business and on each day each EV bus will go thru its entire reservoir of energy by 2pm; as such, SDAP's participation included far greater detail and uniqueness's than the other parties. Specifically, SDAP addressed SDG&E's requests for funding a rideshare program that included Taxi and TNC drivers, SDAP's recommendations were to prioritize shuttles over the Taxi and TNC drivers in the funding program and to include and integrate solar array with battery storage and for the three IOU applications to be consolidated into one proceeding; however, no parties were able to target the SDGE rideshare program the same as SDAP, in fact, many parties only participated in comments with PGE and SCE as SDG&E programs were far unique compared to PGE and SCE as such some of the parties did not address the SDGE programs in detail or at all, in either testimony, hearings, or briefs. SDAP addressed the issues based on discovery via Data Request and by presenting detailed contributions to the factual record and specific recommendations regarding these recommendations and modifications. In addition, SDAP contributed significant analysis regarding SDG&E's Ride Share Shuttle program and its cost-effectiveness opportunity. SDAP provided testimony presenting analytical findings regarding the cost-effectiveness results to support shuttles and to support MHD fleets in fixed routes. SDG&E presented in its application according to the CPUC cost effectiveness protocols to achieve benefits in air quality reduction, and its cost-effectiveness scenarios that SDG&E presented for the Taxi and TNC drivers assumptions for potential to reduce pollutants and the impact of reducing certain pollutants, the benefits on ratepayers and the end to end utility ownership model, a summary of the capital and expenses budgeted with limits of \$4 million in cost per each PR project and on SDG&E's TE program and rates to reduce barriers and

<p>to achieve results that will not create stranded assets and costs recoverable from ratepayers. As a result of these analyses, SDAP developed its own specific recommendations of program modifications that could improve the cost-effectiveness of collecting data, eliminating stranded assets concerns and low utilization, engagement with fleets in SDG&amp;E’s GTSRP project and thereby to only target shuttles. Thus, while other parties and SDAP both addressed the cost effectiveness for fleets, dynamic GIR rates and demand charges, only SDAP addressed the service territory for SDG&amp;E’s proposals in depth in according to its rate structure and the limitation to avoid the day time charging, the peak time charging and an inability to take full advantage of an super off peak rates and thereby SDAP was concerned with no choice for an EV commercial rate that could be available to all TE fleets, SDAP provided significant analytical contributions and recommendations regarding this issue separate from and incremental to other party contributions.</p>	
--	--

**PART III: REASONABLENESS OF REQUESTED COMPENSATION:**

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

<p><b>a. Intervenor’s claim of cost reasonableness:</b> SDAP’s costs of \$38,397 are reasonable given SDAP’s active participation in this proceeding (see part a and b) and reasonable rates that SDAP is hereby requesting to establish a rate for the first time as this is SDAP’s first time to claim intervenor compensation and the 3<sup>rd</sup> time SDAP has participated in a proceeding. As discussed in the attached rate justifications, the rates requested for SDAP’s advocacy are generally toward the lower end of the Commission’s approved compensation ranges.</p>	<p style="text-align: center;"><u>CPUC Discussion</u></p> <p>Noted</p>
<p><b>b. Reasonableness of hours claimed:</b></p>	
<p>b. <u>Allocation of hours by issue:</u> In a proceeding such as this, there are often multiple issues difficult for an expert to breakout and list. Given this difficulty, SDAP has provided high level estimates on an overall budget and the hours are an estimate that can be allocated to specific issues. <b>The allocations are as follows:</b></p> <ul style="list-style-type: none"> <li>• SDG&amp;E Cost-Effectiveness: 47% (includes fleet evaluation of SDG&amp;E’s cost-effectiveness calculation, load impact study results with high VMT when plugging-in at over 20 kW per bus and the opportunity to benefit when the use of renewables</li> </ul>	<p>Noted</p>

is maximized, and the individual program structures need to be targeted for high volume utilization or when an ineffective means limits the use of the incentive rates for commercial TE fleets and the incentive fails for commercial fleets and thereby that would not provide the incentive it was designed to achieve and will not support accelerated adoption of ZEV's)

- SDG&E GIR Rate Programs and Demand Charges including Adder fees and thoroughly evaluated the results of IOU rates verses other EV commercial rates over the other conventional fueled vehicles: 24%
- SDG&E Outreach: 4%
- The remaining hours included scoping the pleadings, drafting data requests, editing the pleadings, reviewing other parties' filings, participating in EV workshops including the CPUC VGI working group and other EV activities that cut across multiple TE issues and barriers.

Issue No.	Hours:	Total % Hours
1)	23.45	12.55% General Prep /Filing (G)
2)	62.25	33.31% Hearings, workshops, Conference (HWC)
3)	0.00	0.00% Filing (F), Is combined in (G)
4)	82.0	43.87% Discovery (D)
5)	20.00	10.7% Testimony (T)
6)	1.70	0.91% Procedural (P)

B. Specific Claim:\*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Lisa McGhee	2016	83	\$100	See attached Rate Justification	\$8,300	78.00 [B]	\$100.00 [A]	\$7,800.00
Lisa McGhee	2017	102	\$100	See attached Rate Justification	\$10,200	81.90 [C]	\$100.00 [A]	\$8,190.00
Lisa McGhee	2018	6	\$100	See attached Rate Justification	\$600	5.00 [D]	\$100.00 [A]	\$500.00
<b>Subtotal: \$ 19,100.00</b>						<b>Subtotal: \$16,490.00</b>		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Travel Time	2016	56.5	\$50	See attached Rate Justification	\$2,825	56.50	\$50.00	\$2,825.00
Air, Hotel and Uber	2016				\$5,914			\$5,914.00
Travel Time	2017	46.50	\$50	See attached Rate Justification	\$2,325	46.50	\$50.00	\$2,325.00
Air, Hotel and Uber	2017				\$4,678			\$4,678.00
Travel Time	2018	0.50	\$50	See attached Rate Justification	\$25	0.50	\$50.00	\$25.00
<b>Subtotal: \$15,767.00</b>						<b>Subtotal: \$15,767.00</b>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Lisa McGhee	2017	2	\$50	See attached Rate Justification	\$100	2.00	\$50.00	\$100.00
Lisa	2018	4	\$50	See attached	\$200	4.00	\$50.00	\$200.00

McGhee				Rate Justification			
<b>Subtotal:</b>				<b>\$300.00</b>	<b>Subtotal: \$300.00</b>		
<b>COSTS</b>							
#	Item	Detail		Amount	Amount		
	Copies/Postal	Printing, Copies, Priority Mailings and CalStart EV Working Group Fee		\$3,230	\$1,843.60 [E]		
<i>Subtotal:</i>				<i>\$3,230.00</i>	<i>Subtotal: \$1,843.60</i>		
<b>TOTAL REQUEST:</b>				<b>\$38,397.00</b>	<b>TOTAL AWARD: \$34,400.60</b>		
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate</p>							

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

Attachment or Comment #	Description/Comment
1	<p>Certificate of Service</p> <p>SDAP is also seeking a Commission approved rate for Lisa McGhee of \$100.00 an hour. Ms. McGhee is SDAP's Policy and Operations Manager. Ms. McGhee has been conducting research for proceedings relating to industry policies and Transportation and Energy regulations and has participated in evidentiary hearings before the CPUC previously. She has provided and drafted testimony and prepared the ICOMP form and timesheet.</p> <p>Lisa McGhee has over 10 years' experience in Transportation Policies and obtained her Commercial Class A driver's license in 1995 and her Commercial Passenger Carrier Bus Drivers License in 2012. Ms. McGhee has over 10 years of fleet management experience and over 20 years' experience in management. Ms. McGhee has provided advocacy work for alternative fuels operations on both the fleet and fuel side and is active in many of the agency working groups with ARB, CEC, Calstart and CPUC as it relates to Transportation Electrification and she is active with the Airport associations and parking industry associations to support</p>

	<p>transportation at airports and at parking lots. She has produced editorials that have been published in National industry magazines and has been invited by California Biodiesel Alliance, UC Davis STEPs and the National Parking Association to speak and participant at annual conferences and to be on the panel of educators. She also has provided consulting services for transportation fleets by doing legal research, filling out forms, managing operational efficiency and maintaining communication and support to management, ownership, executive staff or fleet departments.</p> <p>Ms. McGhee has been with SDAP since April 2010. She started as consultant assisting in research to support the environmental changes and mandates in Transportation to protect the air quality. SDAP has been the first operation to procure Electric Buses in the San Diego County and has been active to support the CPUC Rules and Regulations for SB350. She has provided Testimony and Drafted Data Request. Ms. McGhee also helps to continue to advocate locally and at the State level to support accelerated and reliable adoption of TE and works with other fleets and OEM's to help educate, resolve barriers and to support procurement planning for ZEV's. SDAP is attaching Ms. McGhee's resume.</p>
--	--

D. CPUC Disallowances and Adjustments:

Item	Reason
[A]	Commission finds reasonable a rate of \$100.00 per hour for McGhee in 2016, 2017, and 2018.
[B]	78.00 hours in 2016 reported for McGhee.
[C]	81.90 hours in 2017 reported for McGhee.
[D]	5.00 hours in 2018 reported for McGhee.
[E]	\$1,843.60 reported as additional costs (Copies/Postal).

**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))?	Yes

**FINDINGS OF FACT**

1. San Diego Airport Parking Company is eligible to claim intervenor compensation in this proceeding.
2. San Diego Airport Parking Company has made a substantial contribution to D.18-01-024.
3. The requested hourly rates for San Diego Airport Parking Company's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
4. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
5. The total of reasonable compensation is \$34,400.60.
6. The financial documentation contained in SDAP's March 19, 2018 is appropriately marked as confidential and should remain under seal.

**CONCLUSION OF LAW**

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.
2. Pursuant to Rule 11.4., San Diego Airport Parking Company's financial information filed on March 19, 2018 is confidential and should remain under seal.

**ORDER**

1. San Diego Airport Parking Company shall be awarded \$34,400.60.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company ratepayers, Southern California Edison Company ratepayers, and San Diego Gas & Electric Company ratepayers shall pay San Diego Airport Parking Company their respective shares of the award, based on their California-jurisdictional electric revenues for the 2017 calendar year, to reflect the year in which the proceeding was primarily litigated. 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 June 3, 2018, the 75<sup>th</sup> day after the filing of San Diego Airport Parking Company's request, and continuing until full payment is made.
3. San Diego Airport Parking Company's (SDAP) motion to file under seal its financial information contained in its motion dated March 19, 2018 is granted for a period of three years from the effective date of this decision. During this three-year period, this information shall not be publicly disclosed except on further

Commission order or Administrative Law Judge ruling. If SDAP believes that it is necessary for this information to remain under seal for longer than three years, SDAP may file a new motion showing good cause for extending this order by no later than 30 days before the expiration of this order.

4. The comment period for today's decision is waived.

This decision is effective today.

Dated August 9, 2018, at San Francisco, California.

MICHAEL PICKER

President

CARLA J. PETERMAN

LIANE M. RANDOLPH

MARTHA GUZMAN ACEVES

CLIFFORD RECHTSCHAFFEN

Commissioners

**APPENDIX****Compensation Decision Summary Information**

Compensation Decision:	D1808009	Modifies Decision?	
Contribution Decision(s):	D1801024		
Proceeding(s):	A1701020, A1701021, 1701022		
Author:	Cooke, Goldberg		
Payer(s):	Pacific Gas and Electric Company ratepayers, Southern California Edison Company ratepayers, and San Diego Gas & Electric Company ratepayers.		

**Intervenor Information**

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
San Diego Airport Parking Company	03/19/2018	\$38,397.00	\$34,400.60	N/A	Receipt and Timesheet reporting errors

**Advocate Information**

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Lisa	McGhee	Expert	SDAP	\$100.00	2016	\$100.00
Lisa	McGhee	Expert	SDAP	\$100.00	2017	\$100.00
Lisa	McGhee	Expert	SDAP	\$100.00	2018	\$100.00

**(END OF APPENDIX)**