

Decision 20-05-031 May 21, 2020

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of San Diego Gas & Electric Company (U902E) For Approval of Senate Bill (SB) 350 Transportation Electrification Proposals Regarding Medium and Heavy-Duty Electric Vehicles and a Vehicle-To-Grid Pilot.

Application 18-01-012

DECISION GRANTING INTERVENOR COMPENSATION TO THE SAN DIEGO AIRPORT PARKING COMPANY FOR SUBSTANTIAL CONTRIBUTION TO DECISION 19-08-026

| | |
|--|--|
| Intervenor: San Diego Airport Parking Company | For contribution to Decision (D.) 19-08-026 |
| Claimed: \$ 20,242 | Awarded: \$17,892.07 |
| Assigned Commissioner: Clifford Rechtschaffen | Assigned ALJ: Kelly Hymes & Sasha Goldberg |

PART I: PROCEDURAL ISSUES

| | |
|--|--|
| A. Brief description of Decision: | The Decision approved a settlement with modifications to San Diego Gas & Electric Company’s (SDG&E) Medium-Duty and Heavy-Duty (MDHD) Electric Vehicle (EV) Charging Infrastructure Program and Vehicle to Grid Electric School Bus Application. The settlement as modified adopts a budget of \$107.4 million (reduced from \$150 million in the Application) to support approximately 3,000-6,000 EVs for the MDHD Class 2 to Class 8 ZEV’s. |
|--|--|

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812¹:

| | Intervenor | CPUC Verification |
|--|------------------------------------|------------------------------|
| Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)): | | |
| 1. Date of Prehearing Conference: | March 15, 2018 | Verified |
| 2. Other specified date for NOI: | N/A | |
| 3. Date NOI filed: | April 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: | See below Intervenor Comment No. 1 | Verified D.19-08-026 |
| 6. Date of ALJ ruling: | See below Intervenor Comment No. 1 | Verified August 23, 2019 |
| 7. Based on another CPUC determination (specify): | See below Intervenor Comment No. 1 | Verified October 22, 2019 |
| 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: | A.17-01-020 | Verified |
| 10. Date of ALJ ruling: | August 9, 2018 | Verified |
| 11. Based on another CPUC determination (specify): | N/A | |
| 12. Has the Intervenor demonstrated significant financial hardship? | | Yes |
| Timely request for compensation (§ 1804(c)): | | |
| 13. Identify Final Decision: | D.19-08-026 | Verified |
| 14. Date of issuance of Final Order or Decision: | August 23, 2019 | Verified |
| 15. File date of compensation request: | October 22, 2019 | Verified |
| 16. Was the request for compensation timely? | | Yes |

¹ All statutory references are to California Public Utilities Code unless indicated otherwise.

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

| # | Intervenor’s Comment(s) | CPUC Discussion |
|----|--|-----------------|
| 1. | San Diego Airport Parking Company (“SDAP”) did not receive a ruling on its showing of eligible customer status or financial hardship in this proceeding, however, this information was part of the Notice of Intent filed by SDAP on April 15, 2018 NOI. As per the Commission’s Intervenor Compensation Guide on page 12, “ an ALJ Ruling need not be issued unless: (a) the NOI has requested a finding of “significant financial hardship” under § 1802(g); (b) the NOI is deficient; or (c) the ALJ desires to provide guidance on specific issues of the NOI.” As such, there was no need ruling from the ALJ to SDAP’s Notice of Intent. | Verified |

PART II: SUBSTANTIAL CONTRIBUTION

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

| Intervenor’s Claimed Contribution(s) | Specific References to Intervenor’s Claimed Contribution(s) | CPUC Discussion |
|---|--|-----------------|
| <p>1. SDAP was a participating party in the proceeding and active from the PHC and through to the Decision:</p> <p>SDAP, began participation at the PHC. SDAP has all along been an active EV fleet, SDGE customer in the SB 350’s proceedings and has continued to contribute as a fleet, customer, ratepayer, small business entity in SDGE territory and EV fleet operator. SDAP had participated in all of</p> | <p>3-15-18 10:00 a.m. PHC Motion for Party Status in person at San Francisco.</p> <p>8-30-18 5:30 p.m. Community Meeting Sherman Heights Community Center, San Diego.</p> <p>10-8-2018 11:00 a.m. Settlement Meeting in San Francisco and August 2018 to October 2018 Settlement Discussions.</p> <p>11-5-2018 1:00 p.m.</p> | Verified |

| Intervenor’s Claimed Contribution(s) | Specific References to Intervenor’s Claimed Contribution(s) | CPUC Discussion |
|--|--|------------------------|
| <p>the settlement activities but did not end up becoming a Settling Party. SDAP reviewed testimony and filings, examined discovery, was present at each of the workshops and hearings, and submitted testimony, briefs, and comments at each opportunity including attending workshops at sister agencies to further support MDHD EV accelerated adoption.</p> <p>SDAP identified concerns regarding specific program aspects as it related to the size of the program, EVSE ownership, Standard Connectors, Small Business needs and contributed input to the Settlement Agreement in these areas. SDAP analyzed the utility’s request providing analysis and recommendations to better target the program size based on the size of the territory and to consider Small Business Commercial needs. Evaluating the cost and needs of the small commercial fleets and societal cost effectiveness and benefits, and to improve the program size based on the merits. SDAP made substantial arguments and recommendations regarding implementation of an interim EV rate; however, instead SDGE has filed Application (A.) 19-07-006 requesting a quick decision for an interim</p> | <p>EV Rate Workshop at SDGE, San Diego.</p> <p>Filed Testimony 8-17-18, Filed Settlement Comments 12-5-18, Filed Reply Settlement Comments 12-20-18, Filed PD Opening Comments 8-5-19 and Reply PD Comments 8-12-19.</p> <p>2-27-19 10:00 a.m. PHC in person at San Francisco.</p> <p>D.19-08-026, pp. 5, 28, 49.</p> <p>The Settlement Agreement reached between the parties is confidential, thereby is it protected under the Rules of Practice and Procedure, Rule 12.</p> | |

| Intervenor’s Claimed Contribution(s) | Specific References to Intervenor’s Claimed Contribution(s) | CPUC Discussion |
|--|---|-----------------|
| <p>rate (Track One) in that proceeding that was filed on July 3, 2019 and which was two weeks prior to the Proposed Decision on 7-16-19 in this proceeding. SDAP did a robust analysis and review of the program, contributing to the overall reasonableness of the final decision regardless of SDAP not signing on as a settling party.</p> <p>Per the Commission Rule 12.6, it has been established that it can be difficult to identify specific contributions to a settled outcome considering the confidentiality. Rule 12.6 does not permit disclosure of settlements without each party’s consent. Each settlement agreement reflects a concession of compromises between the participating parties. The Commission has held that participation in settlement negotiations is not adequate to guarantee reflective participation, it has acknowledged that the efforts of the participation in the settlement process does justify compensation, particularly when it contributed to the development of a record that benefits the Commission. (D.08-12-054 at 9-10.).</p> <p>The Commission has found that a Settlement is in the public interest when all active parties in a proceeding reach</p> | <p>D.19-08-026, pp. 28, 30.</p> | |

| Intervenor’s Claimed Contribution(s) | Specific References to Intervenor’s Claimed Contribution(s) | CPUC Discussion |
|--|--|------------------------|
| <p>settlement, that settlement “commands unanimous sponsorship of the affected parties who fairly represent the interests affected by the Settlement (D.17-03-005 at 6 to 7).</p> <p>SDAP was an active participant in settlement negotiations and contributed to the development of a record that justified the Commission’s decision, and can be established as detailed below.</p> <p>Small Business Commercial and minority owned Business entities and ratepayers, including early EV adopters, benefited from SDAP’s participation. The EV end user is most impacted by rate increases and the investments of EV technology cost that go beyond the infrastructure. Small business commercial entities and minority owned business’ do not have the same level of financial support and resources to be active in these proceedings. SDAP is an early adopter that has faced many of the barriers and thereby is familiar with these requirements that need to meet the needs of the lower income producing business entities.</p> | <p>D.19-08-026, pp. 40.</p> | |

| Intervenor’s Claimed Contribution(s) | Specific References to Intervenor’s Claimed Contribution(s) | CPUC Discussion |
|--|--|------------------------|
| <p>2. Program Size & Cost</p> <p>SDG&E’s proposed budget was over \$150 million. SDAP along with other parties provided recommendations, including TURN and NAAC. SDAP joined TURN’s perspective. SDAP advocated for modification to reduce the size of the program otherwise the size of the program was creating more cost than reasonable. SDAP analyzed existing fleet requirements by early EV adopters when procuring vehicles in the early phase and when being first introduced to the technology and thereby adoption will be phased in slowly. SDAP investigated the current MDHD EV stats in the San Diego territory and based on the size of the customer base and the current MDHD adoption level, SDAP determined that SDGE’s program size was significantly higher than those approved for PG&E and SCE’s MDHD programs in D.18-05-040. SDAP influenced and contributed to the reduction of the program size to result in a budget of \$107.4 million and thereby reducing further cost onto ratepayers.</p> | <p>D.19-08-026, pp. 28, 29,33,35,36,44,54.</p> <p>SDAP2 Testimony 8-17-18 pp. 4, lines 18-21 and pp. 12, lines 1-27, pp. 13 lines 1-24.</p> <p>SDAP Settlement Comments 12-5-18 pp. 14, pp. 15 in Conclusion, pp. 19, 21, 22, 23.</p> <p>SDAP Reply Settlement Comments 12-20-18, pp. 3,4, 12.</p> <p>SDAP Reply Settlement Comments 12-20-18, pp. 3,4, 12.</p> <p>SDAP Reply PD Comments 8-12-19, pp. 2, 5.</p> <p>D.19-08-026, pp. 18, 19, 22, 23, 24, 44.</p> | <p>Verified</p> |
| <p>3. EVSE Ownership</p> | <p>SDAP Testimony, August 17, 2018, pp. 10, 11, 24.</p> | <p>Verified</p> |

| Intervenor’s Claimed Contribution(s) | Specific References to Intervenor’s Claimed Contribution(s) | CPUC Discussion |
|--|--|------------------------|
| <p>SDAP did not support SDG&E’s ownership model proposal. SDAP comments to SDGE expressed concerns that the technology is nascent and this could put the ratepayers at risk with stranded assets. SDAP’s contribution is based on experience which is unique from any other party as there were no commercial fleet parties outside of SDAP directly participating. SDAP’s EVSE deployment began 2015 and includes two SDGE pilot programs. This modification is in the public interest as it will reduce the cost on ratepayers.</p> <p>The elimination of utility ownership of the Program’s EVSE seeks to minimize overall costs and maximize overall benefits associated with the Program. The make-ready Program is in the public interest not only because it decreases the costs passed to ratepayers but also because it allows for competition amongst EVSE manufacturers. Because Program participants will be free to select charging equipment and network services from any qualified vendor, market participation from EVSE manufacturers should increase given the demand SDG&E’s Program aims to create.</p> | <p>D.19-08-026, pp. 8, 9, 22, 28, 32,41.</p> | |

| Intervenor’s Claimed Contribution(s) | Specific References to Intervenor’s Claimed Contribution(s) | CPUC Discussion |
|---|---|------------------------|
| <p>4. Standard EVSE Connector</p> <p>In the Settlement SDAP advocated for the EV adopters to have choices. Program participants will be free to select charging equipment and network services from any qualified vendor. This decision will influence participation from more EVSE manufacturers which should increase given the demand SDG&E’s Program aims to create. Additionally, this is in the public interest and it eliminate the cost of this nascent technology that in the MDHD sector has not standard.</p> | <p>D.19-08-026, pp. 21,41.</p> <p>SDAP2 Testimony 8-17-18, pp. 5.</p> | <p>Verified</p> |
| <p>5. Small Business Needs</p> <p>15% of the approved education budget will be dedicated to educating small businesses on the benefits of transportation electrification which may include information on energy use, load management plans and incentive programs for EVs. SDAP was highly supportive is this provision and continues to advocate for small business.</p> | <p>D.19-08-026, pp. 25.</p> <p>SDAP2 Testimony, August 17, 2018, pp. 24, lines 16-23, pp. 25-26, pp. 27, lines 1-2.</p> <p>SDAP Reply Settlement Comments 12-20-18, pp. 6.</p> <p>SBUA Testimony, August 17, 2018, pp. 21-23, Appendix 4-5.</p> | <p>Verified</p> |
| <p>6. Rates</p> <p>SDAP’s participation also entailed a significant amount of work to review and research the biggest issue of rates even</p> | <p>D.19-08-026, pp. 29, 30.</p> | <p>Verified</p> |

| Intervenor’s Claimed Contribution(s) | Specific References to Intervenor’s Claimed Contribution(s) | CPUC Discussion |
|--|---|-----------------|
| <p>though the result did not affect the outcome. Regardless it is essential for effective participation in the overall case for parties’ activities to be reflected into the record to impact the process and future issues, especially on the topic of rates. SB 350 Pilot programs in both of the PGE and SCE territory have provided the commercial sector a rate for EV technology; however, SDGE settled with the settling parties that they would agree to file an application for a commercial EV Rate within 6 months after the Decision. However, SDGE ended up filing for an interim rate before even the Proposed Decision.</p> | <p>SDAP2 Testimony 8-17-18.</p> <p>SDAP Settlement Comments 12-5-18.</p> <p>SDAP Reply Settlement Comments - All included substantial arguments for a Rate.</p> | |

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

| | Intervenor’s Assertion | CPUC Discussion |
|---|------------------------|-----------------|
| <p>a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?²</p> | <p>Yes</p> | <p>Yes</p> |
| <p>b. Were there other parties to the proceeding with positions similar to yours?</p> | <p>Yes</p> | <p>Yes</p> |
| <p>c. If so, provide name of other parties: Small Business Utility Advocates</p> | | <p>Verified</p> |

² The Office of Ratepayer Advocates was renamed the Public Advocate’s Office of the Public Utilities Commission pursuant to SB 854, which the Governor approved on June 27, 2018.

| | Intervenor’s Assertion | CPUC Discussion |
|---|------------------------|-----------------|
| <p>d. Intervenor’s claim of non-duplication:</p> <p>While SDAP and other parties shared certain interests in this proceeding. SDAP covered issues specific to SDG&E with fleets. SDAP is a fleet customer and was capable of addressing fleets issues while representing the small commercial business customer, EV fleet adopters and was the only active fleet operator and party with actual EV early adoption fleet experience and that includes both MDHD EV’s and EVSE infrastructure installed on site.</p> <p>The Commission should find that SDAP’s participation was efficiently coordinated with the participation of others and consistent with such a finding, the Commission should determine that all of SDAP’s work is compensable consistent with the conditions set forth in Section 1802.5.</p> | | <p>Verified</p> |

C. Additional Comments on Part II: (use line reference # or letter as appropriate)

| # | Intervenor’s Comment | CPUC Discussion |
|-----------|--|-----------------|
| <p>1.</p> | <p>Compensation for Partial Success:</p> <p>The Commission has interpreted the Section 1802 definition, in conjunction with Section 1801.3, so as to effectuate the legislature’s intent to encourage effective and efficient intervenor participation. The statutory provision of “in whole or in part,” as interpreted by multiple Commission decisions on intervenor compensation requests, has established as a general proposition, that when a party makes a substantial contribution in a multi-issue proceeding, it is entitled to compensation for time and expenses even if it does not prevail on some of the issues.</p> <p>The standard for an award of intervenor compensation is whether SDAP made a substantial</p> | <p>Noted.</p> |

| # | Intervenor’s Comment | CPUC Discussion |
|----|---|---------------------------------|
| | contribution to the Commission’s decision, not whether if SDAP prevailed on a particular issue. | |
| 2. | <p>Compensation for Contribution to Commission Decision Making:</p> <p>The Commission has granted compensation where a parties’ participation contributed to the decision-making process even if specific recommendations were not adopted, and where a parties’</p> | We note SDAP’s partial comment. |

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

| | CPUC Discussion |
|---|--------------------------------|
| <p>a. Intervenor’s claim of cost reasonableness:</p> <p>SDAP’s costs of \$20,242 are reasonable given SDAP’s active participation in this proceeding and reasonable rate that SDAP has for its compensation rate.</p> <p>These costs were reasonable given the advocacy and time spent on evaluating the issues. SDAP is very sensitive to cost and applied an effective method to manage all cost for its participation.</p> <p>SDAP’s participation in A.18-01-012 contributed to the programs size reducing the budget from \$150 million to \$107.5 million which also reduces the risk of future stranded costs that would be paid by ratepayers.</p> <p>SDAP’s participation also contributed to the ownership model removal, this has a great impact on ratepayers that has now reduced the recovery cost of this capital and the risk that SDAP has been advocating for regarding stranded costs.</p> <p>SDAP’s was the only party seriously advocating for an interim rate for commercial EV’s in order to support these deployments as SDAP was the only party that is a fleet with actual billings and impacts from the SDGE rates that can demonstrate this barrier when adopting. SDAP collaborated</p> | Noted but with some deduction. |

| | CPUC Discussion |
|---|------------------------|
| <p>with SBUA on its use case and 15% of the funds will be devoted to educating small commercial entities.</p> <p>SDAP also contributed to the ownership model removal, this has a great impact on ratepayers that has now reduced the recovery cost of this capital and the risk that SDAP has been advocating for regarding stranded costs.</p> <p>SDAP cannot calculate all of the monetary benefits to ratepayers or quantify the contribution. However, due to SDAP’s advocacy efforts and the policies related to Transportation and Climate goals, SDAP’s participation and development of experiencing the deployment first hand when implementing the technology will continue to help share lessons learned and support the acceleration of adoption by others. SDAP’s request for compensation is a minor compared to value of the savings and efficiencies that will contribute to the future outcomes and moreover, should be found reasonable.</p> | |
| <p>b. Reasonableness of hours claimed:</p> <p>SDAP applied hours spent are reasonable. The amount that SDAP is requesting for compensation is approximately 163 hours of total time on the issues and advocacy.</p> <p>Time devoted was required in order to address the issues for participating. This time has been expressed within this document of how SDAP has spent its time and use of resources. Based on the volume of pleadings and party testimony and issues to examine SDAP has laid out and tracked its participation in order to effectively make best use of the time and resources.</p> <p>The amount of time and resources are believed to be warranted and are reasonable.</p> | Noted |
| <p>c. Allocation of hours by issue:</p> <p>The attached timesheets reports indicate the number of hours spent addressing multiple issues and have been established and identified by the following codes:</p> <p>GP/F – 54 hours – 35% of total General Participation work and Filings that are required in order to comprehend the issues. This includes research related to the pleadings. Spending time reviewing the application, Scoping Memo, transcripts,</p> | Noted |

| | CPUC Discussion |
|--|-----------------|
| <p>Rulings and Notices and Comments by other parties including on the Settlement and the Agreement.</p> <p>Procedural – 9 hours – 5% of total Spending time discussing the proceeding internally and with other parties. Some of this time is to assist in resolving issues and supporting any overlapping or duplicative work.</p> <p>Testimony – 19 – 12% of total Research and advocacy on appropriate levels on the program size, cost and the current market segment. Spending time on Researching and drafting testimony and opening & reply comments on Settlement Agreement. Evaluating and spending time on issues related to the model ownership and small business commercial needs. There is time devoted to drafting, editing etc.</p> <p>Discovery – 58 hours – 38% of total Time and effort spent on research, drafting, and reviewing data requests and responses in preparation for Testimony. This includes review of party data requests and responses by SDG&E including from other proceedings. This time includes validating and evaluating data.</p> <p>Hearings, Conference, Workshops, Settlement – 26.5 hours – 17% of total Time spent attending and participating in workshops, hearings, settlement meetings or negotiations. This does include preparing work for settlement meetings and discussions, research and analysis. Also included is time spent at Workshop for EV Rate and the prehearing conference.</p> <p>NOI COMP – 14 hours Work preparing the notice of intent and to claim compensation (1 hours) and the filing of the final claim requesting compensation and preparing the supporting reporting documents (13 hours).</p> <p>If the Commission believes allocation should be adjusted is SDAP requests the opportunity to supplement this section of the request.</p> | |

A. Specific Claim:*

| CLAIMED | | | | | | CPUC AWARD | | |
|---|------|-------|---------|----------------------------|----------|------------------------------|-----------------|--------------|
| ATTORNEY, EXPERT, AND ADVOCATE FEES | | | | | | | | |
| Item | Year | Hours | Rate \$ | Basis for Rate* | Total \$ | Hours | Rate \$ | Total \$ |
| Lisa McGhee | 2018 | 121.5 | \$100 | D.18-08-009 | \$12,150 | 109.5 [1] | \$100.00 | \$10,950.00 |
| Lisa McGhee | 2019 | 42 | \$107 | See Comment 1 | \$4,494 | 32.00 [2] | \$105.00 [3] | \$3,360.00 |
| <i>Subtotal: \$16,644</i> | | | | | | <i>Subtotal: \$14,310.00</i> | | |
| 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 \$ |
| Lisa McGhee, Travel Time | 2018 | 18 | \$50 | @ 50% of \$107 (2019 Rate) | \$900 | 18.00 | \$50.00 | \$900.00 |
| Air, Transportation Cost | 2018 | | | | \$863.5 | N/A | N/A | \$863.72 [4] |
| Lisa McGhee, Travel Time | 2019 | 6 | \$53.5 | @ 50% of \$100 (2018 Rate) | \$321 | 6.00 | \$52.50 | \$315.00 |
| Air, Transportation Cost | 2019 | | | | \$434.15 | N/A | N/A | \$434.15 |
| <i>Subtotal: \$2,518.3</i> | | | | | | <i>Subtotal: \$2,512.87</i> | | |
| INTERVENOR COMPENSATION CLAIM PREPARATION ** | | | | | | | | |
| Item | Year | Hours | Rate \$ | Basis for Rate* | Total \$ | Hours | Rate | Total \$ |
| Lisa McGhee | 2018 | 4 | \$100 | @ 50% of \$100 (2018 rate) | \$200.00 | 4.00 | \$50.00 [5] | \$200.00 |

| CLAIMED | | | | | CPUC AWARD | | | |
|---|---------|---|--------|----------------------------|---------------------------------|----------|---------|----------|
| Lisa McGhee | 2019 | 10 | \$53.5 | @ 50% of \$107 (2019 Rate) | \$535 | 10.00 | \$52.50 | \$525.00 |
| Subtotal: \$735.5 | | | | | Subtotal: \$725.00 | | | |
| COSTS | | | | | | | | |
| # | Item | Detail | | | Amount | Amount | | |
| 1. | Copies | Copying of pleadings for ALJ and Commissioner Offices | | | \$131.20 | \$131.20 | | |
| 2. | Postage | Postage for pleadings to CPUC | | | \$208.00 | \$208.00 | | |
| 3. | Phone | Phone bill for calls or conference calls necessary for proceeding | | | \$5.00 | \$5.00 | | |
| Subtotal: \$344.20 | | | | | Subtotal: \$344.20 | | | |
| TOTAL REQUEST: \$20,242 | | | | | TOTAL AWARD: \$17,892.07 | | | |
| <p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§ 1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate</p> | | | | | | | | |

B. Attachments Documenting Specific Claim and Comments on Part III:
(attachments not attached to final Decision)

| Attachment or Comment # | Description/Comment |
|-------------------------|--|
| 1 | Certificate of Service |
| 2 | Time Records Report |
| 3 | Cost/Expense details |
| 4 | Travel Expenses |
| 5 | Hours Allocated by Issue |
| 6 | Out of Pocket Expense Receipts (Attached separately) |

| Attachment or Comment # | Description/Comment |
|-------------------------|--|
| Comment 1 | <p>2019 Hourly Rate</p> <p>SDAP request the Commission adjust an hourly rate for Lisa McGhee for her 2019 compensation rate and to be based off of Resolution ALJ 357. This would approve the COLA and first 5% step rounded to the nearest dollar of a rate of \$107.00. The following calculation was applied:</p> $\$100 * 1.023 * 1.05 = \107.415 <p>Resolution ALJ-357 adopts a 2019 COLA of 2.35%. Applying the 2019 COLA of 2.35%, adopted in Resolution ALJ-357, and then adding the first 5% step increase, is reflected in the rate of \$107.00</p> <p>If the Commission does not approve this adjusted 2019 compensation rate, SDAP requests that the 2019 rate used in this claim NOT be deemed the official adopted rate for Lisa McGhee in 2019 as SDAP will offer a justification for a higher rate for her 2019 compensation in a future claim request.</p> |

C. CPUC Comments, Disallowances, and Adjustments

| Item | Reason |
|------|--|
| [1] | 12 hours are deducted from 2018 (March to Dec 2018) cost claim as labor hours description stating expert review hours for managing participation in proceeding is vague and did not clearly indicate what and how this contributed to the final decision. |
| [2] | 10 hours are deducted from 2019 (January to August 2019) cost claim as labor hours description stating expert review hours for managing participation in proceeding is vague and did not clearly indicate what and how this contributed to the final decision. |
| [3] | Adopting a 2019 rate of \$105 for McGee based on her previously adopted hourly rate of \$100 for 2018 adjusted by the 2.35% Cost-of Living Adjustment for 2019 adopted in Resolution ALJ-357 and her first 5% step increase rounded to the nearest \$5 dollar increment. |
| [4] | Math error. Correct total is \$863.72 |
| [5] | Typographical error. \$100 was typed in as the rate but total amount being claimed was calculated with the correct 50% of the rate (\$50). |

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 has made a substantial contribution to D.19-08-026.
2. 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.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$17,892.07.

CONCLUSION OF LAW

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

ORDER

1. San Diego Airport Parking Company shall be awarded \$17,892.07.
2. Within 30 days of the effective date of this decision, San Diego Gas & Electric Company shall pay the San Diego Airport Parking Company the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning January 5, 2020, the 75th day after the filing of San Diego Airport Parking Company's request, and continuing until full payment is made.

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

This decision is effective today.

Dated May 21, 2020, at San Francisco, California.

MARYBEL BATJER

President

LIANE M. RANDOLPH

MARTHA GUZMAN ACEVES

CLIFFORD RECHTSCHAFFEN

GENEVIEVE SHIROMA

Commissioners

APPENDIX**Compensation Decision Summary Information**

| | | | |
|---------------------------|----------------------------------|--------------------|----|
| Compensation Decision: | D2005031 | Modifies Decision? | No |
| Contribution Decision(s): | D1908026 | | |
| Proceeding(s): | A1801012 | | |
| Author: | ALJ Hymes and ALJ Goldberg | | |
| Payer(s): | San Diego Gas & Electric Company | | |

Intervenor Information

| Intervenor | Date Claim Filed | Amount Requested | Amount Awarded | Multiplier? | Reason Change/ Disallowance |
|-----------------------------------|-------------------------|-------------------------|-----------------------|--------------------|---|
| San Diego Airport Parking Company | 10/22/19 | \$20,242.00 | \$17,892.07 | N/A | See Disallowances and Adjustments, above. |

Hourly Fee Information

| First Name | Last Name | Attorney, Expert, or Advocate | Hourly Fee Requested | Year Hourly Fee Requested | Hourly Fee Adopted |
|-------------------|------------------|--------------------------------------|-----------------------------|----------------------------------|---------------------------|
| Lisa | McGhee | Advocate | \$100 | 2018 | \$100 |
| Lisa | McGhee | Advocate | \$107 | 2019 | \$105 |

(END OF APPENDIX)