

Decision 20-11-038 November 19, 2020

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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| Application of San Diego Gas & Electric Company (U902E) for Approval of its 2018 Energy Storage Procurement and Investment Plan. | Application 18-02-016 |
| And Related Matters. | Application 18-03-001 Application 18-03-002 |

DECISION GRANTING COMPENSATION TO THE UTILITY REFORM NETWORK FOR SUBSTANTIAL CONTRIBUTION TO DECISIONS (D.) 18-10-036 AND D.19-06-032

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| Intervenor: The Utility Reform Network (TURN) | For contribution to Decisions (D.) 18-10-036, D.19-06-032 |
| Claimed: \$67,039.21 | Awarded: \$67,039.21 |
| Assigned Commissioner: Marybel Batjer | Assigned ALJ: Brian Stevens |

PART I: PROCEDURAL ISSUES

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| A. Brief description of Decision: | In D.18-10-036, <i>Decision Approving AB 2514 Energy Storage Procurement Framework for the 2018 Biennial Procurement Period</i> , the Commission approved the Assembly Bill (AB) 2514 components of the applications of Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E). The Commission also determined that it should not adopt policies here related to technology diversity in energy storage deployed in California, but should consider this issue in a potential future energy storage rulemaking. |
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| | In D.19-06-032, <i>Decision Implementing the AB 2868 Energy Storage Program and Investment Framework and Approving AB 2868 Applications with Modification</i> , the Commission addressed the AB 2868 components of the applications of PG&E, SCE, and SDG&E and provided direction on how to seek future approvals for energy storage projects pursuant to AB 2868. |
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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: | 5/1/2018 | Verified |
| 2. Other specified date for NOI: | N/A | |
| 3. Date NOI filed: | 5/31/18 | 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: | I.15-08-019 | Verified |
| 6. Date of ALJ ruling: | 11/8/17 | Verified |
| 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: | I.15-08-019 | Verified |
| 10. Date of ALJ ruling: | 11/8/17 | Verified |
| 11. Based on another CPUC determination (specify): | | |
| 12. Has the Intervenor demonstrated significant financial hardship? | | Yes |

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

| | Intervenor | CPUC Verification |
|---|-------------------|--------------------------|
| Timely request for compensation (§ 1804(c)): | | |
| 13. Identify Final Decision: | D.19-06-032 | Verified |
| 14. Date of issuance of Final Order or Decision: | 7/5/2019 | Verified |
| 15. File date of compensation request: | 8/30/2019 | Verified |
| 16. Was the request for compensation timely? | | Yes |

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): (For each contribution, support with specific reference to the record.)

| Intervenor’s Claimed Contribution(s) | Specific References to Intervenor’s Claimed Contribution(s) | CPUC Discussion |
|---|---|------------------------|
| <p><u>D.18-10-036 (re AB 2514 Procurement)</u></p> <p>Technology Diversity</p> <p>In response to the Commission’s questions exploring whether to prioritize technology diversity in the upcoming AB 2514 energy storage solicitations, TURN recommended against any changes to the Commission historic technology-neutral approach to solicitations at this time. TURN explained that the Commission’s intent to transform the storage market to allow cost-effective storage to compete effectively with other grid resources is not dependent on any particular state of technology diversity in the market. Because utility needs will vary, so should the</p> | <ul style="list-style-type: none"> • TURN Reply Comments on Technology Diversity in AB 2514 Procurement, 9/5/18, pp. 1-5 • D.18-10-036, p. 25 | Verified |

| Intervenor’s Claimed Contribution(s) | Specific References to Intervenor’s Claimed Contribution(s) | CPUC Discussion |
|---|--|------------------------|
| <p>technology winners and losers, as long as the Commission’s policies promote accurate valuation of diverse attributes and otherwise help to remove market barriers to storage. Given this, TURN suggested it would be premature to conclude that the AB 2514 solicitation results to date spell the end of any opportunity for non-lithium ion technologies to succeed in future solicitations.</p> <p>In D.18-10-036, the Commission adopted the outcome recommended by TURN (and others). The Commission stated, “Based on comments, at this time the Commission is not compelled to support nor reject the notion that there may be value in ensuring that there is a diverse fleet of energy storage technologies deployed throughout the State. We agree with parties that this topic may be most appropriately suited for consideration in a potential future energy storage rulemaking.”</p> | | |
| <p><u>A.19-06-032 (re AB 2868 Programs and Investments)</u></p> <p>1. Utility vs. Third Party Ownership</p> | <ul style="list-style-type: none"> • TURN Opening Brief, 10/5/18, pp. 3-10 • TURN Reply Brief, 10/19/18, pp. 1-5 | <p>Verified</p> |

| Intervenor’s Claimed Contribution(s) | Specific References to Intervenor’s Claimed Contribution(s) | CPUC Discussion |
|---|---|-----------------|
| <p>TURN recommended that the Commission cap utility ownership of AB 2868 storage assets at 50% to provide ratepayers with the benefits of ownership diversity. The utilities vehemently opposed this recommendation and argued in briefs and comments on the Proposed Decision that AB 2868 requires utility-owned “investments”. TURN, in response, demonstrated that the Legislature afforded the Commission with discretion to consider third party-owned storage resources as part of its implementation of AB 2868.</p> <p>The Commission in D.19-06-032 agreed with TURN (and the Public Advocates Office) that AB 2868 does not preclude the consideration or approval of third-party owned storage resources. While the Commission did not adopt TURN’s proposed cap on utility-owned storage, the Commission required consideration of both utility-owned and third party-owned resources without any bias toward either ownership model, explaining, “The Commission supports the procurement of the most cost effective energy storage regardless of the ownership model.”</p> | <ul style="list-style-type: none"> • TURN Reply Comments on Proposed Decision (PD), 3/25/19, pp. 3-4 • TURN Reply Comments on Alternate PD, 6/18/19, pp. 1-2 • D.19-06-032, pp. 58-60 (legal requirements of AB 2868); pp. 65-66 (Commission requirement to consider both ownership models without bias) | |

| Intervenor’s Claimed Contribution(s) | Specific References to Intervenor’s Claimed Contribution(s) | CPUC Discussion |
|--|---|-----------------|
| <p>2. Contributions from Project Participants</p> <p>TURN recommended that the Commission require that AB 2868 projects leverage at least 20% of total project costs from project participants (excluding projects targeted at low-income customers or without an identifiable participant customer). The Commission embraced TURN’s proposal in D.19-06-032, explaining, “[W]e agree with TURN that customer owned projects should receive at least 20% of total costs from participants, with the exception of projects targeted specifically to low-income customers.”</p> | <ul style="list-style-type: none"> • Ex. TURN-01, pp. 5-6 • TURN Opening Brief, 10/5/18, pp. 10-13 (addressing PG&E’s opposition in rebuttal testimony) • D.19-06-032, p. 57 | <p>Verified</p> |
| <p>3. Delivery of AB 2868 Intended Benefits by Storage Facilities</p> <p>TURN recommended that the Commission direct the utilities to collect data on the performance of AB 2868 storage facilities, including the delivery of benefits intended by the statute (such as reliability, petroleum reduction, and GHG benefits) because of the speculative nature of those benefits. In D.19-06-032, the Commission agreed with TURN that the utilities must do more to link the intended benefits to any approved AB 2868 projects.</p> | <ul style="list-style-type: none"> • Ex. TURN-01, p. 7 • TURN Opening Brief, 10/5/18, pp. 15-18 • D.19-06-032, pp. 70-71 and p. 57 | <p>Verified</p> |

| Intervenor’s Claimed Contribution(s) | Specific References to Intervenor’s Claimed Contribution(s) | CPUC Discussion |
|---|---|-----------------|
| <p>First, the Commission required the utilities to include with any future contract or project proposal a clear demonstration of how each project “establishes controls that ensure that the project[] will reduce dependence on petroleum, meet air quality standards, and reduce greenhouse gas emissions.” Second, the Commission put the utilities on notice that it “retains the right to conduct a retroactive reasonableness review of benefits [including GHG reduction] and wholesale market revenues generated through the market participation of these energy storage systems.”</p> | | |
| <p>4. Review Process for AB 2868 Programs and Investments</p> <p>TURN recommended that review of future AB 2868 programs and investments should occur via Application rather than Advice Letter. The Commission agreed with TURN (and the Public Advocates Office) in D.19-06-032 “that the Applications thus far are not complete enough to justify future approval through and Advice Letter process.” The Commission accordingly required an Application process for everything but</p> | <ul style="list-style-type: none"> • <i>See, e.g.</i>, TURN Reply Brief, 10/19/18, pp. 5-9 • D.19-06-032, p. 74 | <p>Verified</p> |

| Intervenor’s Claimed Contribution(s) | Specific References to Intervenor’s Claimed Contribution(s) | CPUC Discussion |
|---|--|-----------------|
| <p>PG&E’s proposed behind the meter water heat pump program, which it found sufficiently detailed for a Tier 3 Advice Letter.</p> | | |
| <p>5. SDG&E’s Circuit-Level Microgrid Projects</p> <p>TURN presented testimony showing that SDG&E proposed excessive amounts of storage for the primary purpose of its Microgrid proposal – to island critical public sector facilities – and that the additional ratepayer benefits claimed by SDG&E would not justify this oversizing. TURN also showed that SDG&E’s cost caps were excessive, given market conditions. TURN recommended that the Commission adopt TURN’s cost cap, which was based on the MWh necessary to serve the peak load of the critical facilities (as opposed to the whole circuit) for one hour of backup, plus an additional 25% of capacity for any incidental load, and EIA’s average cost per MWh.</p> <p>The Commission relied in part on TURN’s analysis in D.19-06-032 in concluding, “SDG&E’s requests do not meet the threshold necessary for the Commission to make a reasonableness determination. In turn, the Commission does</p> | <ul style="list-style-type: none"> • Ex. TURN-01, pp. 8-18 • TURN Opening Brief, pp. 18-30 • TURN Reply Comments on Proposed Decision (PD), 3/25/19, pp. 4-5 • TURN Reply Comments on Alternate PD, 6/18/19, pp. 2-3 • D.19-06-032, pp. 20-21 (also discussing the showings of other intervenors who challenged SDG&E's proposals) • <i>See also</i> Proposed Decision, issued 2-26-19, p. 21 (“TURN introduced sufficient doubt that SDG&E’s proposed cost caps are reasonable and appropriate.”) | <p>Verified</p> |

| Intervenor’s Claimed Contribution(s) | Specific References to Intervenor’s Claimed Contribution(s) | CPUC Discussion |
|--|---|-----------------|
| <p>not grant rate recovery for the requested utility owned projects at the seven proposed project sites.” As the Commission explained, “TURN also provided sufficient evidence to bring into question the reasonableness of the sizing of the energy storage projects; this is especially concerning as the proposed projects are solely utility owned projects.” The Commission accordingly adopted guidelines “to address the concerns of” TURN and other parties, for SDG&E to follow in any RFO for the identified projects.</p> | | |
| <p>6. SCE’s “Local Energy Storage to Improve Load Factor” Proposal</p> <p>TURN demonstrated that SCE’s load factor storage proposal would not necessarily confer benefits on CARE customers (or any customers) in a certain area, despite SCE’s claims. TURN accordingly proposed that the Commission modify SCE’s proposal to require SCE to target investment to areas with identified needs, thus increasing actual benefits and reducing costs. TURN supported up to 12 MW of targeted circuit-level investment for circuits meeting the specific criteria proposed by TURN (criteria</p> | <ul style="list-style-type: none"> • Ex. TURN-01, pp. 20-22 • TURN Opening Brief, 10/5/18, pp. 33-38 • TURN Reply Brief, 10/19/18, pp. 15-18 • D.19-06-032, pp. 45-46 | <p>Verified</p> |

| Intervenor’s Claimed Contribution(s) | Specific References to Intervenor’s Claimed Contribution(s) | CPUC Discussion |
|--|--|------------------------|
| <p>that would ensure local reliability benefits and general ratepayer benefits).</p> <p>In D.19-06-032, the Commission relied on TURN’s analysis (as well as the advocacy of others) in concluding that the benefits presented by SCE were too speculative for the Commission to approve any extent of SCE’s proposal: “TURN makes a compelling case that SCE did not establish a solid link between load factor and circuit reliability. This brings into question whether installing this system level storage in areas with high penetration of CARE customers will meet the spirit of the statute that intended to prioritize the provision of energy storage systems for low-income customers.” ... "At this time, the Commission cannot make a reasonableness determination on potential benefits that are entirely speculative with no recourse if the benefits do not materialize." Accordingly, the Commission authorized SCE hold an RFO “in a way that addresses the reasoned concerns of the intervening parties.”</p> | | |
| <p>7. PG&E’s Front of the Meter Program</p> | <ul style="list-style-type: none"> • Ex. TURN-01, p. 23 | <p>Verified</p> |

| Intervenor’s Claimed Contribution(s) | Specific References to Intervenor’s Claimed Contribution(s) | CPUC Discussion |
|--|--|------------------------|
| <p>TURN recommended that PG&E be required to re-submit its AB 2868 application with additional detail and information, such as site locations, costs, revenue requirement, and project benefits, to enable a more appropriate level of review. The Commission in D.19-06-032 agreed with TURN (and the Public Advocates Office and CESA) that PG&E did not provide enough information for the Commission to determine whether its proposal was reasonable and declined to authorize it as proposed. The Commission explained, “We agree with TURN that the passage of AB 2868 should not be used by the utilities as an excuse for a lower level of detail and review than for any other investment. TURN correctly points out an obvious missing aspects of PG&E’s Application includes specific site locations, costs, revenue requirement, and projections of benefits. Additionally, PG&E has not made a sufficient showing that there is a public interest in limiting the procurement to utility owned projects, explicitly excluding third party owned projects.”</p> | <ul style="list-style-type: none"> • TURN Opening Brief, 10/5/18, pp. 38-39 • D.19-06-032, pp. 31-32 | |

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?² | 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’s positions overlapped to varying extents with those taken by the Public Advocates Office (Cal Advocates), Small Business Utility Advocates (SBUA), the California Energy Storage Alliance (CESA), Green Power Institute, and LS Power Development, LLC (LS Power). | | Verified |
| d. Intervenor’s claim of non-duplication: TURN coordinated closely with the Public Advocates Office (then called the Office of Ratepayer Advocates) from the outset of this proceeding. As a result of that coordination, TURN was able to focus its analysis on aspects of each utility’s applications that would complement the showing of the Public Advocates Office. For instance, the Public Advocates Office focused on cost-effectiveness issues, while TURN focused on the extent to which each utility’s proposals would achieve the reliability, air quality, and GHG reduction benefits intended by AB 2868 while minimizing costs. Where TURN advocated similar positions as the other parties identified above, TURN offered unique analysis that served to complement the showing of other parties. For example, TURN provided extensive legal analysis to demonstrate the error in the utilities’ position regarding exclusive utility ownership of AB 2868 projects, while parties such as CESA, Green Power Institute, and LS Power focused more on policy and operational arguments against the utilities’ positions. As such, TURN submits that there was no undue duplication. | | Verified |

² The Office of Ratepayer Advocates was renamed the Public Advocate’s Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

| | CPUC Discussion |
|---|------------------------|
| <p>a. Intervenor’s claim of cost reasonableness:</p> <p>TURN’s request for intervenor compensation seeks an award of approximately \$67,000 as the reasonable cost of our participation in this proceeding. TURN submits that these costs are reasonable in light of the importance of the issues TURN addressed and the benefits to customers.</p> <p>TURN’s advocacy reflected in D.19-06-032 resulted in the Commission’s conclusion that most of the AB 2868 proposals of SDG&E, SCE, and PG&E should not be authorized and funded by ratepayers, pending the utilities’ submission of modified applications that address the concerns raised by parties and the Commission’s guidance presented in D.19-06-032. SDG&E had proposed an annual revenue requirement for its AB 2868 front-of-the-meter proposals of \$284.6 million (tied to a cost cap). Neither SCE nor PG&E requested a specific revenue requirement; both sought approval to develop projects and come back for cost recovery. Nonetheless, TURN submits that our advocacy resulted in significant benefit to ratepayers by preventing ratepayers from bearing costs for storage programs and investments that do not provide the ratepayer benefits, air quality improvements, and GHG reductions intended by the Legislature in enacting AB 2868.</p> <p>TURN's advocacy reflected in D.18-10-036 addressed policy matters related to the Commission’s AB 2514 Energy Storage Procurement program (specifically the extent to which the Commission should adopt requirements related to technology diversity), rather than specific rates or disputes over particular dollar amounts. TURN’s contribution to the Commission’s policy rules will help to ensure appropriate Commission oversight of the program, minimize the risk of market dysfunction, and maximize benefits to ratepayers from storage procured through the program. Although TURN cannot easily identify precise monetary benefits to ratepayers from our work related to D.18-10-036, TURN submits that its positive impact on the Commission’s policies regarding the Energy Storage Procurement program in this proceeding will afford ratepayers significant benefits, as the establishment of energy policies has a direct and lasting impact on customer rates.</p> <p>As such, the Commission should treat this compensation request as it has treated similar past requests with regard to the difficulty of establishing specific monetary benefits associated with TURN’s participation (or that</p> | <p>Verified</p> |

| | CPUC Discussion |
|---|-----------------|
| <p>of another intervenor). (<i>See, e.g.</i> D.13-12-027, p. 11 (awarding Sierra Club California intervenor compensation for energy storage policy work in R.10-12-007); D.15-07-028, p. 7 (awarding TURN intervenor compensation for energy storage policy work in A.14-02-006 et al.); and D.16-06-027 and D.18-07-022 (awarding TURN intervenor compensation for energy storage policy work R.15-03-011)).³</p> <p>For all of these reasons, the Commission should find that TURN's efforts have been productive.</p> | |
| <p>b. Reasonableness of hours claimed:</p> <p>This request for compensation includes approximately 200 hours of work, including just over 100 hours of TURN’s attorney time, 95 hours of TURN’s in-house energy analyst’s time, and 5 hours of expert consultant time. This time reflects TURN’s initial analysis of the AB 2868 proposals in SDG&E’s, SCE’s, and PG&E’s applications, TURN’s preparation of testimony and opening and reply briefs related to all three applications, and TURN’s review of and comments on the Proposed Decision and Alternate Proposed Decision that preceded D.19-06-032. It also reflects TURN’s analysis of and comments on the technology diversity issues addressed in D.18-10-036.</p> <p>TURN assigned this proceeding to staff attorney Hayley Goodson and energy analyst Eric Borden, both of whom have worked on prior proceedings related to the Commission’s Energy Storage Procurement Program. Mr. Borden and Ms. Goodson briefly consulted with TURN attorney Marcel Hawiger on issues within his expertise. TURN also relied on outside expert consultant Kevin Woodruff of Woodruff Expert Services, as we have in prior energy storage proceedings. Mr. Woodruff has extensive experience with energy procurement, renewable</p> | <p>Verified</p> |

³ See also D.99-12-005, pp. 6-7 (Compensation Decision in 1995 Storm Phase of PG&E GRC, A.97-12-020) and D.00-04-006, pp. 9-10 (Compensation Decision in Edison PBR Midterm Review, A.99-03-020) (recognizing the overall benefit of TURN’s participation where that participation assisted the Commission in developing a record on which to assess the reasonableness of the utility’s operations, and particularly its preparedness and performance in the future); D.00-05-022 (Compensation Decision in the Emergency Standards Proceeding) (awarding TURN \$92,000 in D.00-10-014 for our substantial contribution to the earlier decision, despite TURN’s inability to assign a dollar value to the benefit of our participation in order to demonstrate “productivity.” Interestingly, the Commission awarded compensation even though the emergency restoration standards may never come into play in the future, since they come into play only after a “major outage,” which is defined as impacting more than 10% of a utility’s customers. The contingent nature of the future standards did not cause the Commission to hesitate in awarding TURN compensation.).

| | | CPUC Discussion | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|---------------------------|--------------------|---------------------------|------------|---|------|------------|--|------|-------------|--|-------|----------|---|-------|---------|--------------------------------------|------|----|--|------|----|---|-------|-----|---|------|-------|
| <p>procurement, LTTP, and resource adequacy issues, making him a useful resource as TURN determined what to focus on and developed its positions in this proceeding. Finally, TURN consulted with outside expert consultants Dennis Stephens and Paul Alvarez of the Wired Group on issues related to the sizing and configuration of SDG&E’s microgrid storage projects. Mr. Stephens worked for nearly 40 years as an electrical engineer in distribution operations at Xcel Energy, while Mr. Alvarez has nearly two decades of experience developing and analyzing utility smart grid investments to maximize customer benefits.</p> <p>TURN submits that the Commission should find the hours requested here to be reasonable under the circumstances, and that TURN’s showing supports that conclusion. However, should the Commission believe that more information is needed or that a different approach to discussing the reasonableness of the requested hours is warranted here, TURN requests the opportunity to supplement this section of the request.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>c. Allocation of hours by issue:</p> <p>TURN has allocated its daily time entries by activity codes to better reflect the nature of the work reflected in each entry. TURN has used the following activity codes:</p> <table border="1" data-bbox="203 1186 1153 1871"> <thead> <tr> <th>Code</th> <th>Description</th> <th>Allocation of Time</th> </tr> </thead> <tbody> <tr> <td>AB2868-PGE</td> <td>Work specific to PG&E's AB 2868 proposals</td> <td>4.0%</td> </tr> <tr> <td>AB2868-SCE</td> <td>Work specific to SCE's AB 2868 proposals</td> <td>9.7%</td> </tr> <tr> <td>AB2868-SDGE</td> <td>Work specific to SDG&E's AB 2868 proposals</td> <td>29.4%</td> </tr> <tr> <td>AB2868-#</td> <td>Work related to multiple substantive issue areas that is not easily allocated to specific issues.</td> <td>29.9%</td> </tr> <tr> <td>TechDiv</td> <td>Work related to technology diversity</td> <td>7.7%</td> </tr> <tr> <td>GP</td> <td>Work associated with general participation in this proceeding.</td> <td>1.7%</td> </tr> <tr> <td>PD</td> <td>Work was related to the Proposed Decision preceding D.19-06-032</td> <td>12.2%</td> </tr> <tr> <td>APD</td> <td>Work was related to the Alternate Proposed Decision preceding D.19-06-032</td> <td>1.7%</td> </tr> </tbody> </table> | | Code | Description | Allocation of Time | AB2868-PGE | Work specific to PG&E's AB 2868 proposals | 4.0% | AB2868-SCE | Work specific to SCE's AB 2868 proposals | 9.7% | AB2868-SDGE | Work specific to SDG&E's AB 2868 proposals | 29.4% | AB2868-# | Work related to multiple substantive issue areas that is not easily allocated to specific issues. | 29.9% | TechDiv | Work related to technology diversity | 7.7% | GP | Work associated with general participation in this proceeding. | 1.7% | PD | Work was related to the Proposed Decision preceding D.19-06-032 | 12.2% | APD | Work was related to the Alternate Proposed Decision preceding D.19-06-032 | 1.7% | Noted |
| Code | Description | Allocation of Time | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| AB2868-PGE | Work specific to PG&E's AB 2868 proposals | 4.0% | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| AB2868-SCE | Work specific to SCE's AB 2868 proposals | 9.7% | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| AB2868-SDGE | Work specific to SDG&E's AB 2868 proposals | 29.4% | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| AB2868-# | Work related to multiple substantive issue areas that is not easily allocated to specific issues. | 29.9% | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| TechDiv | Work related to technology diversity | 7.7% | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| GP | Work associated with general participation in this proceeding. | 1.7% | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| PD | Work was related to the Proposed Decision preceding D.19-06-032 | 12.2% | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| APD | Work was related to the Alternate Proposed Decision preceding D.19-06-032 | 1.7% | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | | CPUC Discussion |
|--|--|-------------|-----------------|
| Comp | Intervenor Compensation: work preparing TURN's NOI and this Request for Compensation | 3.8% | |
| TOTAL | | 100% | |
| <p>If the Commission believes that a different approach to issue-specific allocation is warranted here, TURN requests the opportunity to supplement this section of the request.</p> | | | |

B. Specific Claim:*

| CLAIMED | | | | | | CPUC AWARD | | |
|-------------------------------------|------|-------|---------|---|-------------|------------|---------|-------------|
| ATTORNEY, EXPERT, AND ADVOCATE FEES | | | | | | | | |
| Item | Year | Hours | Rate \$ | Basis for Rate* | Total \$ | Hours | Rate \$ | Total \$ |
| Hayley Goodson, TURN Staff Attorney | 2018 | 71.75 | \$435 | D.18-04-020 | \$31,211.25 | 71.75 | \$435 | \$31,211.25 |
| Hayley Goodson, TURN Staff Attorney | 2019 | 28.25 | \$445 | D.18-04-020; Res. ALJ-357 (2.35% 2019 COLA) | \$12,571.25 | 28.25 | \$445 | \$12,571.25 |
| Eric Borden, TURN Energy Analyst | 2018 | 94.00 | \$210 | D.18-11-043 | \$19,740.00 | 94 | \$210 | \$19,740.00 |
| Eric Borden, TURN Energy Analyst | 2019 | 0.75 | \$215 | D.18-11-043; Res. ALJ-357 (2.35% 2019 COLA) | \$161.25 | 0.75 | \$215 | \$161.25 |
| Marcel Hawiger, TURN Attorney | 2018 | 0.75 | \$435 | D.18-06-023 | \$326.25 | 0.75 | \$435 | \$326.25 |

| CLAIMED | | | | | | CPUC AWARD | | |
|--|---------|---|----------|---|------------|---------------------------------|----------|------------|
| Dennis Stephens, Wired Group | 2018 | 1.50 | \$225 | D.19-02-019 (rate authorized for 2016) | \$337.50 | 1.5 | \$225 | \$337.50 |
| Paul Alvarez, Wired Group | 2018 | 1.00 | \$225 | D.19-02-019 (lower than rate authorized for 2016) | \$225.00 | 1 | \$225 | \$225.00 |
| Kevin Woodruff, Woodruff Expert Services | 2018 | 2.50 | \$265 | D.18-07-022 | \$662.50 | 2.50 | \$265 | \$662.50 |
| Subtotal: \$65,235.00 | | | | | | Subtotal: \$65,235.00 | | |
| INTERVENOR COMPENSATION CLAIM PREPARATION ** | | | | | | | | |
| Item | Year | Hours | Rate \$ | Basis for Rate* | Total \$ | Hours | Rate \$ | Total \$ |
| Hayley Goodson | 2018 | 1.00 | \$217.50 | 1/2 of 2018 hourly rate; D.18-04-020 | \$217.50 | 1 | \$217.50 | \$217.50 |
| Hayley Goodson | 2019 | 7.00 | \$222.50 | 1/2 of 2019 hourly rate | \$1,557.50 | 7 | \$222.50 | \$1,557.50 |
| Subtotal: \$1,775.00 | | | | | | Subtotal: \$1,775.00 | | |
| COSTS | | | | | | | | |
| # | Item | Detail | | | Amount | Amount | | |
| 1. | Copies | Copies of filings related to A.18-02-016 et al. | | | \$15.60 | \$15.60 | | |
| 2. | Postage | Mailing costs for filings related to A.18-02-016 et al. | | | \$13.61 | \$13.61 | | |
| Subtotal: \$29.21 | | | | | | Subtotal: \$29.21 | | |
| TOTAL REQUEST: \$67,039.21 | | | | | | TOTAL AWARD: \$67,039.21 | | |
| <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</p> | | | | | | | | |

| CLAIMED | | | CPUC AWARD |
|---|--------------------------------------|---------------|---|
| 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. | | | |
| **Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer’s normal hourly rate | | | |
| ATTORNEY INFORMATION | | | |
| Attorney | Date Admitted to CA BAR ⁴ | Member Number | Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation |
| Hayley Goodson | December 2003 | 228535 | No |
| Marcel Hawiger | January 1998 | 194244 | No |

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

| Attachment or Comment # | Description/Comment |
|-------------------------|--|
| Attachment 1 | Certificate of Service |
| Attachment 2 | Timesheets for TURN’s Attorneys and Experts |
| Attachment 3 | TURN Direct Expenses Associated with D.18-10-036 and D.19-06-032 |
| Attachment 4 | TURN Hours Allocated by Issue |

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 (see Rule 14.6(c)(6))? | Yes |
|---|-----|

FINDINGS OF FACT

1. The Utility Reform Network has made a substantial contribution to D.18-10-036 and D.19-06-032.

⁴ This information may be obtained through the State Bar of California’s website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

2. The requested hourly rates for The Utility Reform Network's representatives 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 are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$67,039.21.

CONCLUSION OF LAW

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

ORDER

1. The Utility Reform Network shall be awarded \$67,039.21.
2. Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company shall pay The Utility Reform Network their respective shares of the award, based on their California-jurisdictional, electric revenues for the 2018 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 November 13, 2019, the 75th day after the filing of The Utility Reform Network'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 November 19, 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: | D2011038 | Modifies Decision? | No |
| Contribution Decision(s): | D1810036, D1906032 | | |
| Proceeding(s): | A1802016, et al. | | |
| Author: | ALJ Stevens | | |
| Payer(s): | Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas & Electric Company | | |

Intervenor Information

| Intervenor | Date Claim Filed | Amount Requested | Amount Awarded | Multiplier? | Reason Change/ Disallowance |
|----------------------------|-------------------------|-------------------------|-----------------------|--------------------|------------------------------------|
| The Utility Reform Network | 8/30/19 | \$67,039.21 | \$67,039.21 | N/A | N/A |

Hourly Fee Information

| First Name | Last Name | Attorney, Expert, or Advocate | Hourly Fee Requested | Year Hourly Fee Requested | Hourly Fee Adopted |
|-------------------|------------------|--------------------------------------|-----------------------------|----------------------------------|---------------------------|
| Hayley | Goodson | Attorney | \$435 | 2018 | \$435 |
| Hayley | Goodson | Attorney | \$445 | 2019 | \$445 |
| Eric | Borden | Expert | \$210 | 2018 | \$210 |
| Eric | Borden | Expert | \$215 | 2019 | \$215 |
| Marcel | Hawiger | Attorney | \$435 | 2018 | \$435 |
| Dennis | Stephens | Expert | \$225 | 2018 | \$225 |
| Paul | Alvarez | Expert | \$225 | 2018 | \$225 |
| Kevin | Woodruff | Expert | \$265 | 2018 | \$265 |

(END OF APPENDIX)