Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission's Own Motion to Conduct a Comprehensive Examination of Investor Owned Electric Utilities' Residential Rate Structures, the Transition to Time Varying and Dynamic Rates, and Other Statutory Obligations.	Rulemaking 12-06-013

DECISION GRANTING COMPENSATION TO THE UTILITY REFORM NETWORK FOR SUBSTANTIAL CONTRIBUTION TO DECISION (D.) 19-09-004

Intervenor: The Utility Reform Network (TURN)	**For contribution to Decision (D.) 19-09-004**
Claimed: $27,883.13	**Awarded:** $27,883.13
Assigned Commissioner: Marybel Batjer	**Assigned ALJs:** Patrick Doherty and Sophia Park

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	In **D.19-09-004**, *Decision Addressing Phase 4 Issues*, the Commission resolved (1) Pacific Gas and Electric Company's (PG&E's) request to recover 2015-2016 costs recorded in its Residential Rate Reform Memorandum Account; (2) proposals for restructuring the California Alternative Rates for Energy (CARE) program; and (3) issues related to the Working Groups established pursuant to D.15-07-001 and reporting requirements for residential rate reform.

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812[1]:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	10/24/12	Verified
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	11/26/12	Verified
4. Was the NOI timely filed?		Yes
Showing of eligible customer status (§ 1802(b) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	R.12-06-013	Verified
6. Date of ALJ ruling:	2/25/13	Verified
7. Based on another CPUC determination (specify):	N/A	
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
Showing of "significant financial hardship" (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	R.11-11-008	Verified
10. Date of ALJ ruling:	1/3/12	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.20-03-026	Verified
14. Date of issuance of Final Order or Decision:	4/2/20	Verified
15. File date of compensation request:	6/1/20	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:

#	Intervenor's Comment(s)	CPUC Discussion
Line 13	Rule 17.3 of the Commission's Rules of Practice and Procedure provides that a request for intervenor compensation may be filed "after the issuance of a decision that resolves an issue on which the intervenor believes it made a substantial contribution, but in no event later than 60 days after the issuance of the decision closing the proceeding." In D.16-06-022 the Commission affirmed that Rule 17.3 permits a request to be filed any time after the issuance of any decision to which the intervenor believes it made a substantial contribution until 60 days after the issuance of the decision closing the proceeding. (D.16-06-022, pp. 21-22). TURN submits this request for compensation for substantial contribution to D.19-09-004 within 60 days of the issuance of D.20-03-026, *Decision Addressing Phase 5 Issues and 2016 Order to Show Cause,* in which the Commission closed this proceeding. D.20-03-026 was issued on April 2, 2020, making this request timely filed.	Noted
Comment 1	TURN has filed several requests for intervenor compensation in this proceeding and received awards of compensation. The current compensation request includes only work that TURN has not previously included in requests for compensation.	Noted

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
<u>CARE Restructuring</u> In D.19-09-004, the Commission determined that it should not adopt structural changes to the CARE discount *at this time*, consistent with the recommendations of the "CARE Restructuring Working Group". TURN was a member of the CARE Restructuring Working Group since its inception at the Commission's directive in 2016. In its final status report, the CARE Restructuring Working Group reported that no consensus proposal other than the status quo had been reached for the following reasons: "Without a clear statement of policy priorities (subsidizing essential usage, reducing energy burden, reducing disconnections, or other alternatives) parties do not have a standard for evaluating restructuring options. Without access to sufficient data and evidence of an equally equitable and more efficient method for identifying which CARE customers should receive additional rate relief and without sufficient data to analyze the impact on CARE customers that receive less relief in return, the view of most participants at the workshop was that the status quo CARE program providing a similar percentage discount to all CARE customers within a service territory should remain in place at this time until and unless a statement of policy priorities for the CARE program is identified and sufficient information has been made available to develop and test potential alternative structures to respond to the identified priorities." This conclusion followed several years of work undertaken by TURN and the other members of the CARE Restructuring Working Group, as recounted below.	• D.19-09-004, Finding of Fact 16, 17; Conclusion of Law 10 • Joint Status Report on Development of CARE Restructuring Consensus Proposals, 4/19/19	Verified

In D.15-07-001, the Commission determined that it would consider making structural changes to the CARE discount in Phase 3 of this proceeding. The Commission made this determination in response to recommendations by several parties, including TURN, that the Commission modify the way the CARE subsidy is distributed to eligible customers to better promote the affordability of essential electricity service. Thereafter on October 15, 2015, the Commission issued the *Assigned Commissioner and Administrative Law Judge's Scoping Memo and Ruling for Phase Three*, which identified potential changes to the CARE program under Assembly Bill 327 as an issue within Phase 3 and called for a "CARE Restructuring" workshop during First Quarter 2016.	• D.15-07-001, pp. 6, 237-238, 298. • Assigned Commissioner and Administrative Law Judge's Scoping Memo and Ruling for Phase Three, 10/15/15, pp. 3, 5	Verified
Pursuant to this schedule, ALJ McKinney sent an email to parties on February 2, 2016, indicating her intention to schedule a CARE Restructuring Workshop at the end of March and seeking input on scheduling. She indicated her expectation that TURN (among others) would present its ideas for restructuring the CARE discount at the workshop and answer questions. After receiving this email, TURN began preparing for the forthcoming CARE Restructuring Workshop.	• E-Mail from ALJ McKinney, 2/2/16 (see Attachment 4)	Verified
The Commission held this first CARE Restructuring Workshop on March 29, 2016. Energy Division, the ALJ Division, the utilities, and TURN all gave presentations. TURN addressed the statutory constraints on the CARE discount and projected CARE rates per tier across the 2015-2020 glidepath for each utility. TURN also offered goals to guide restructuring of the CARE discount, recounted its 2013/2014 proposal with a declining discount with each higher tier, and offered several options for consideration and modeling, including for inverted tier and TOU rates, as well as adjustments for Net Energy Metering. TURN suggested that additional data collection was necessary to inform CARE restructuring, including correlations between bill payment challenges and climate	• E-Mail Ruling Notifying Parties of CARE Restructuring Workshop and Directing Utilities to Prepare Presentations, 3/4/16 • Agenda for 3/29/16 Workshop (see Attachment 5) • TURN Presentation at 3/29/16 Workshop (see Attachment 6)	

area, household size, and income level. TURN noted that the flexibility provided by AB 327, which capped the discount at the service territory level but not the customer-specific discount, could permit additional discounts for customers who are most at risk of shutoffs.		
Following the workshop on 3/29/16, the Commission issued a ruling directing PG&E and TURN to coordinate with parties and Energy Division to convene a "pre-working group" meeting. The purpose of this meeting was to identify studies to support evaluation of possible CARE discount structures; propose long-term steps and schedule; consider when to engage the Low Income Oversight Board and other stakeholders; and address coordination with other appropriate CPUC proceedings. The ruling ordered parties to file a Joint Statement recounting the status of this effort by May 2, 2016, which was extend to June 6, 2016, by the May 2, 2016 *E-Mail Ruling Notifying Parties of New Date for CARE Restructuring Joint Statement*.	• E-Mail Ruling Regarding CARE Restructuring Next Steps, 4/1/16 • E-Mail Ruling Notifying Parties of New Date for CARE Restructuring Joint Statement, 5/2/16	
TURN was a very active participant in the "pre-working group" meeting that was held at the Commission on 5/16/16. During the workshop, participants identified the data points that could inform CARE restructuring -- such as "who are customers, where are they, and why are they struggling? Is it climate related? Square footage? Cost of Living? Household size? Climate zone? Where are the struggling customers?" -- as well as potential data sources. Participants agreed that the utilities would determine what data from the list could be provided from their own data sources and what could be gathered from other sources and report back to the group. This work commenced, with the facilitation of Energy Division staff and input from working group participants on prioritization of data points.	• Statement of PG&E (on Behalf of all Participants) on Status of CARE Restructuring Pre-Working Group Discussions Pursuant to April 1, 2016 ALJ Ruling, 6/6/16	
Then on October 24, 2016, the Commission issued a ruling directing PG&E and TURN to file a joint status report on behalf of the CARE Restructuring Working Group by October 27, 2016, regarding the status of discussions regarding "what data is needed in	• E-Mail Ruling Directing PG&E and TURN to File Joint Status Report on Behalf of CARE	Verified

order for parties to consider the effectiveness of the current structure of the CARE discount and propose alternatives." PG&E filed this report on behalf of the Working Group on 10/27/16, explaining the efforts underway since June 2016 to develop the priority data sets identified by the working group. In early 2017, the Commission issued the Assigned Commissioner and Administrative Law Judge's Ruling Amending Scoping Memorandum and Ruling, which provided further guidance and a timeline for the CARE Restructuring Working Group process and directed the group to file a status report by the end of June 2017. The working group met by phone on April 19, 2017 but things progressed slowly after that. The working group requested a schedule extension because developing the consensus dataset was taking longer than anticipated, and the availability of the dataset was essential for further consensus-building discussions on potential CARE restructuring and reform concepts and measures. The Commission granted the extension and set the new date for the next status report of August 31, 2017. The utilities filed the next status report on August 31, 2017, explaining that on August 1 the data had been made available to the CARE Restructuring Working Group by Energy Division, and that the utilities, Energy Division, and other working group members were planning to meet in late September/early October to review the data set, discuss research questions, assess analysis needs, and discuss next steps. On October 5, 2017, the Commission scheduled a workshop for the CARE Restructuring Working Group to discuss the data sets, perceived problems that could hinder analysis, and next steps and deliverables. At that time, the due date for a consensus recommendation from the working group was January 31, 2018. The utilities filed a motion, at the request of Energy Division staff and after consultation with the other working group members, on December 13, 2017, requesting that the Commission suspend the schedule for the working group	Restructuring Working Group, 10/24/16 • Statement of PG&E (on Behalf of all Participants) on Status of CARE Restructuring Pre-Working Group's Progress Pursuant to October 24, 2016 ALJ Ruling, 10/27/16 • Administrative Law Judge's Ruling Amending Scoping Memorandum and Ruling, 1/23/17, pp. 12, 14 • Motion of PG&E (on behalf of the working group) to Extend and Revise Procedural Schedule for CARE Restructuring Working Group, 5/9/17 • E-Mail Ruling Modifying Procedural Schedule for CARE Restructuring Track, 6/23/17 • Statement of San Diego Gas & Electric Company on CARE Restructuring Working Group Status Pursuant to June 23, 2017 Administrative Law Judge Ruling, 8/31/17 • E-Mail Ruling Noticing October 5 Workshop on CARE Restructuring, 9/27/17 • Agenda for CARE Restructuring Working Group Workshop, 10/5/17 (see Attachment 7) • Motion by SCE on Behalf of Itself, PG&E, and	

because the group did not believe the January 31, 2018 deadline was feasible because of other competing proceedings addressing residential rate reform and other issues. The Commission granted this request, suspending the schedule for the CARE Restructuring track of Phase 3. In early 2019, the Commission revitalized the CARE Restructuring issue and placed it in Phase 4 of this proceeding. The Commission held a workshop on March 29, 2019 and required parties to file a status report on April 19, 2019 "on development of consensus proposals" for restructuring the CARE program. TURN participated in a panel at the end of the workshops, discussing the data and analysis provided by the utilities and other parties related to customer impacts from potential changes to the structure of the CARE discount. TURN observed that this analysis created more questions than answers about how we might better promote affordability through changes to the structure of the CARE discount, given the finite amount of subsidy to be distributed through the program. The result of this funding constraint is that any change would increase bills for some CARE customers while decreasing bills for others, without an obvious way – based on currently available information and policy guidance -- to increase public welfare without decreasing bill affordability for some CARE customers. Following the workshop, participants filed the required joint status report, recounting the workshop discussions and informing the Commission that "no consensus proposal other than the Status Quo was reached". As noted above, participants pointed to the lack of a "clear statement of policy priorities (subsidizing essential usage, reducing energy burden, reducing disconnections, or other alternatives)," which would inform the evaluation of CARE restructuring options. Participants also noted the need for more information to inform "which CARE customers should receive additional rate relief" and the "impact on CARE customers that receive less relief in return."	SDG&E to Suspend the Procedural Schedule for CARE Restructuring Working Group, 12/13/17 • E-Mail Ruling Suspending Procedural Schedule for CARE Restructuring Track, 12/20/17 • Assigned Commissioner's Scoping Memo and Ruling for Phase 4 of the Proceeding, 1/15/19, pp. 3-5 (scheduling the CARE Restructuring working on 2/25/19 and requiring a status report on 3/29/19) • E-Mail Ruling Modifying the Schedule for CARE Restructuring Issues, 2/15/19 (setting the workshop on 3/29/19 and status report on 4/19/19) • Joint Status Report on Development of CARE Restructuring Consensus Proposals, 4/19/19	

In D.19-09-004, the Commission agreed with TURN and the other CARE Restructuring Working Group participants that "no alternative CARE structure should be adopted at this time." The Commission reasoned, in part, that "[b]ased on the currently available data, … no alternative structure of the CARE program has been proposed that would be a more equitable and efficient means of protecting low-income customers compared to the current rate structure."	• D.19-09-004, pp. 13-17; Conclusion of Law 10	Verified

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	Yes
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Yes
c. If so, provide name of other parties: Cal Advocates, the Center for Accessible Technology (CforAT), and Utility Consumers Action Network (UCAN) were active members of the CARE Restructuring Working Group from its inception and had similar concerns with TURN's for CARE customers struggling to afford bills. The Consumer Federation of California also participated in the early working group process and had similar interests as TURN's.		Noted
d. Intervenor's claim of non-duplication: TURN's presentation at the initial CARE Restructuring Working on March 29, 2016, addressing potential alternative ways of distributing the CARE subsidy for analysis, provided a framework for the working group to consider when developing ideas for the data set needed to evaluate alternatives to the status quo. After that, TURN focused on supporting the development of a useful data set and opining on the results of other parties' data analysis.		Noted

[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.

TURN did not duplicate the data set analysis conducted by the Public Advocates Office and other parties. TURN also notes that in a proceeding such as this where many stakeholder groups are encouraged to participate, some degree of duplication may be practically unavoidable.[3] Nonetheless, TURN submits that its compensation in this proceeding should not be reduced because TURN shared interests with other working group members who participated collaboratively in a working group process responsive to the Commission's directives. As such, TURN submits that there was no undue duplication between TURN's participation and that of Cal Advocates and the other CARE Restructuring Working Group members with whom TURN shared some positions.	

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: TURN's request for intervenor compensation seeks an award of approximately $28,000 as the reasonable cost of our participation in the CARE Restructuring track of this proceeding, which was resolved by the Commission in D.19-09-004. TURN's advocacy reflected in D.19-09-004 addressed policy matters related to CARE program, rather than specific rates or disputes over particular dollar amounts. The CARE program is intended to increase the	Noted

[3] *See, i.e.* D.96-08-040 (67 CPUC 2d 562, 575-576.X)("[B]ecause of the extraordinary level of participation required of both parties and intervenors throughout these proceedings, we find that a reduction in the amount awarded to intervenors based on duplication of effort is unwarranted. Section 1803(b) requires that the awarding of fees to intervenors "be administered in a manner that encourages the effective and efficient participation of all groups that have a stake in the public utility regulation process." Each of the intervenor groups clearly has a stake in the process of restructuring California's electrical services industry and we are grateful for their participation in these proceedings. Moreover, we rely on them to continue their effective and efficient participation in our proceedings as we move forward with the many implementation tasks ahead. [footnote omitted][¶] . . . . In a broad, multi-issue proceeding such as this, we expect to see some duplication of contribution. This duplication does not diminish the value of that contribution to the Commission. In our view, to deduct from an award of reasonable fees in this case would not encourage the effective and efficient participation of all stakeholders in the spirit of § 1801.3(b).")

affordability of natural gas and electricity services for low-income utility customers, but of course this proceeding focused only on CARE electric rate policy. TURN cannot easily identify precise monetary benefits to ratepayers from our work related to D.19-09-004, given the nature of the issues presented. For this reason, 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 on matters related to the CARE program. *See i.e.* D.20-04-026 and D.17-03-022 (awarding TURN intervenor compensation for contributing to decisions in A.14-11-007 et al.). In sum, the Commission should conclude that TURN's overall request is reasonable given the issues at stake and the adopted outcome.	
b. Reasonableness of hours claimed: This Request for Compensation includes approximately 72 hours for TURN's attorneys, stemming from early 2016 through mid-2019, plus preparation of this request for compensation in 2020. This time includes developing a presentation for the initial CARE Restructuring Workshop, participation at that workshop, and active participation throughout the CARE Restructuring Working Group process that followed from 2016 through 2019. As a working group member, TURN participated in workshops, phone calls, and email communications with Energy Division staff and the other working group members or a subset thereof, providing input on the development of data sets and the implications of that data and analysis for the issue of whether the Commission should modify the structure of the CARE discount. TURN Staff Attorney Matthew Freedman prepared and delivered TURN's presentation at the kick-off CARE Restructuring workshop in March 2016 and worked with PG&E and the other utilities to set up the subsequent pre-working group meeting required by the Commission. TURN Staff Attorney Hayley Goodson took the lead thereafter on the CARE Restructuring Working Group, with occasional input from Staff Attorney Marcel Hawiger, who was leading TURN's advocacy in other areas of R.12-06-013. 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. 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.	Noted

c. Allocation of hours by issue: 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: **Code** / **Description** / **Allocation of Time** / **Hours** CARE-Restruct / The work in this category was related to participation in the CARE Restructuring track of this proceeding, primarily as a member of the CARE Restructuring Working Group convened by the Commission in 2016. / 88.5% / 63.50 Comp / The work in this category was related to preparing this request for intervenor compensation. / 11.5% / 8.25 **TOTAL** / / **100.00%** / **71.75** 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.	Noted

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	2016	20.75	$380	D.17-03-022	$7,885.00	20.75	$380.00	$7,885.00
Hayley Goodson, TURN Staff Attorney	2017	8.75	$405	D.18-01-020	$3,543.75	8.75	$405.00	$3,543.75
Hayley Goodson, TURN Staff Attorney	2018	0.25	$435	D.18-04-020	$108.75	0.25	$435.00	$108.75
Hayley Goodson, TURN Staff Attorney	2019	13.75	$445	D.19-11-009	$6,118.75	13.75	$445.00	$6,118.75

Marcel Hawiger, TURN Staff Attorney	2016	0.25	$415	D.16-06-024	$103.75	0.25	$415.00	$103.75
Marcel Hawiger, TURN Staff Attorney	2018	1.75	$435	D.18-06-023	$761.25	1.75	$435.00	$761.25
Marcel Hawiger, TURN Staff Attorney	2019	0.50	$445	D.19-11-011	$222.50	0.50	$445.00	$222.50
Matthew Freedman, TURN Staff Attorney	2016	17.50	$415	D.16-06-024	$7,262.50	17.50	$415.00	$7,262.50
					Subtotal: $26,006.25			***Subtotal:* $26,006.25**
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate**	**Total $**
Hayley Goodson, TURN Staff Attorney	2020	8.25	$227.50	1/2 of requested 2020 hourly rate; See Comment #1	$1,876.88	8.25	$227.50 [1]	$1,876.88
					Subtotal: $1,876.88			***Subtotal: $1,876.88***
					TOTAL REQUEST: $27,883.13			***TOTAL AWARD: $27,883.13***

*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

**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
Matthew Freedman	March 2001	214812	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
Attachment 3	TURN Hours Allocated by Issue
Attachment 4	E-Mail from ALJ McKinney, 2/2/16
Attachment 5	Agenda for 3/29/16 Workshop
Attachment 6	TURN Presentation at 3/29/16 Workshop
Comment 1	**Hourly Rate for Hayley Goodson -- 2020** The Commission has yet to adopt a 2020 COLA for intervenor hourly rates. Pending the Commission's COLA determination, TURN has used a placeholder COLA of 2% to calculate a 2020 rate for TURN Staff Attorney Hayley Goodson. Applying a 2% COLA to Ms. Goodson's authorized 2019 hourly rate of $445 yields a 2020 hourly rate of $455 when rounded to the nearest $5. If the Commission adopts a COLA that supports a different hourly rate for Ms. Goodson, TURN requests that the Commission adjust the requested 2020 hourly rate accordingly.

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1]	We have applied the 2020 COLA of 2.55% to Hayley Goodson's 2019 Attorney rate of $445.00, per Resolution ALJ-387. The application of the 2020 COLA, rounded to the nearest $5 per D.08-04-010, brings Hayley Goodson's 2020 Attorney rate to $455.00. As intervenor compensation claim preparation hours

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

	are compensated at ½ of preparer's normal hourly rate we approve the rate of $227.50.

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 (*see* Rule 14.6(c)(6))?	Yes

FINDINGS OF FACT

1. The Utility Reform Network has made a substantial contribution to D.19-09-004.

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 $27,883.13.

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 $27,883.13.

2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric shall pay The Utility Reform Network their respective shares of the award, based on their California-jurisdictional electric revenues for the 2016 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 August 15, 2020, 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 _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D1909004		
Proceeding(s):	R1206013		
Author:	ALJ Doherty and ALJ Park		
Payer(s):	Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	6/1/20	$27,883.13	$27,883.13	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	$380	2016	$380.00
Hayley	Goodson	Attorney	$405	2017	$405.00
Hayley	Goodson	Attorney	$435	2018	$435.00
Hayley	Goodson	Attorney	$445	2019	$445.00
Hayley	Goodson	Attorney	$455	2020	$455.00
Marcel	Hawiger	Attorney	$415	2016	$415.00
Marcel	Hawiger	Attorney	$435	2018	$435.00
Marcel	Hawiger	Attorney	$445	2019	$445.00
Matthew	Freedman	Attorney	$415	2016	$415.00

(END OF APPENDIX)