

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 ~~GRATING~~GRANTING COMPENSATION TO THE UTILITY CONSUMERS' ACTION NETWORK FOR SUBSTANTIAL CONTRIBUTION TO DECISION (D.) 16-09-016, D.17-09-036, D.17-12-023, AND D.19-04-018

Intervenor: Utility Consumers' Action Network	For contribution to Decision (D.)16-09-016, D.17-09-036, D.17-12-023, D.19-04-018
Claimed: \$247,116.61	Awarded: \$215,147.19
Assigned Commissioner: Marybel Batjer	Assigned Administrative Law Judges (ALJs): Patrick Doherty and Sophia Park

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	<p>In the above-captioned proceeding (Residential Rate Reform or RRR) UCAN is requesting compensation for substantial contributions made in four different decisions in two different phases. Three of the decisions are from Phase 3 and one of the decisions is from Phase 4. This proceeding was closed on March 26, 2020 with a final decision (D.20-03-026) in Phase 5. UCAN is not making any claim for time in Phase 5. Below are brief descriptions of each decision in which UCAN is making a claim for time and substantial contributions:</p> <p><u>Phase 3 D.16-09-016 (Sept. 19, 2016):</u></p> <p>In this decision, the Commission adopted an interpretation of Public Utilities Code (PUC) Section 745 that allowed the Commission and parties to the proceeding to take steps to obtain certain data. This data was needed to evaluate the impact of default Time-of-Use (TOU) on certain customer groups. PUC Section 745 set forth conditions, including findings regarding the impact of default TOU on certain customer groups, that must be met prior to the implementation of default TOU in California.</p> <p><u>Phase 3 D.17-09-036 (Oct. 2, 2017):</u></p> <p>In this decision, the Commission found that in interpreting the conditions set forth in PUC Section 745 about considering the impact of TOU on certain customer groups, there was no basis to exclude senior citizens in hot climate zones from default TOU rates but that economically vulnerable customers in hot climate zones should be excluded from the default TOU pilots scheduled to begin March 2018. The decision also determined that according to Section 745(c)(4), existing customers who are transitioned from a tiered rate to a TOU rate must receive one year of interval usage data prior to being defaulted to TOU and that defaulted customers receive one year of bill protection. However, once TOU became the “standard turn-on rate” for new customers, the investor-owned utilities were not required to provide interval usage data or bill protection to new customers.</p> <p><u>Phase 3 D.17-12-023 (Dec. 20, 2017):</u></p>
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	<p>This decision incrementally expanded the existing Energy Upgrade California (EUC) campaign, reaffirming the Commission's commitment to optimize, align and integrate electricity-related customer engagement campaigns for different Commission programs. The EUC campaign began in A.12-08-007 when the Commission selected a consultant (DDB San Francisco) to implement and administer statewide outreach for energy efficiency and energy management under the EUC brand. The expansion in this decision consisted of amendments to the EUC contract including strategy and content development for statewide marketing, education and outreach (ME&O) for the residential rate reform program. The decision also affirmed that utilities may switch customers to TOU rates in waves rather than all at the same time.</p> <p><u>Phase 4 D.19-04-018 (May 1, 2019):</u></p> <p>This decision denied San Diego Gas & Electric Company's (SDG&E) petition for modification (PFM) of Commission Decision (D.) 15-07-011 and D. 17-07-006. Both of these decisions related to the roll out of Time-of-Use rates that included the Super-User Electricity Surcharge, also known as the High User Charge or HUC. In this PFM, SDG&E requested to suspend or eliminate the HUC claiming that as implemented the HUC was having a punitive effect rather than the conservation effect it was designed to have on electricity users. According to SDG&E, this was due to a very hot summer requiring some residents to use more electricity than normal. The Commission believed that adopting the petition would lead to rate increases for nearly all SDG&E residential customers and would not substantially address the problem it was purported to solve. Therefore, the PFM was denied.</p>
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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:	August 24, 2015	Verified
2. Other specified date for NOI:		

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

3. Date NOI filed:	February 7, 2014	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:	A.17-01-012	Verified
6. Date of ALJ ruling:	April 24, 2017	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:	A.17-01-012	Verified
10. Date of ALJ ruling:	April 24, 2017	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)): 		
13. Identify Final Decision:	D.20-03-026	Verified
14. Date of issuance of Final Order or Decision:	April 2, 2020	Verified
15. File date of compensation request:	June 1, 2020	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):

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
Proceeding Summary This proceeding was initiated on June 12, 2012 after Senate Bill 695 became law in 2009 allowing the Commission to		Verified

<p>transition residential customers to time variant rates as early as 2013. This Rulemaking was opened to examine the existing residential rate design at the time, including the tier structure in effect for residential customers, the state of time variant and dynamic pricing, potential pathways from tiers to time variant and dynamic pricing, and preferable residential rate design to be implemented when certain tiered rate statutory restrictions were lifted. The proceeding went through five phases and was finally closed on March 26, 2020. UCAN became a party by filing a protest on December 22, 2013 and later a motion to accept the protest on January 15, 2014. UCAN participated in Phases 1, 2, 3 and 4. UCAN did not participate in Phase 5. UCAN was previously granted compensation for its work in Phases 1 and 2. (See D.15-12-040 found in attachments to D.15-07-001.) In this current intervenor compensation request, UCAN seeks compensation for its time and contributions in Phases 3 and 4, as described below.</p> <p>UCAN represents and protects the interests of ratepayers in the San Diego Gas & Electric territory. Throughout all phases of this proceeding, UCAN supported default TOU, advocated for positions that advanced reasonable tiered rate reforms, and tried to mitigate customer bill impacts to</p>	<p>UCAN Motion to Accept UCAN's Protest to Phase 2 Supplemental Filing of San Diego Gas and Electric (U920M), filed January 15, 2014.</p>	
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protect SDG&E ratepayers from unreasonable rateshock.		
<p>Phase 3: D.16-09-016: Requirements of CA Pub. Util. Code Sec. 745</p> <p>UCAN participated in the TOU Pilot Working Group and workshops ordered in D.15-07-001 (Phase 1 decision issued July 13, 2015). The Commission then scoped a review of PUC Sec. 745 requirements into a Phase 3 via the Scoping Memo issued Oct. 15, 2015, stating these requirements needed to be addressed before considering default TOU rates. The Scoping Memo directed parties to develop consensus Section 745 definitions/interpretations through the already existing TOU working group. Parties suggested these requirements could be addressed without testimony or evidentiary hearings. Therefore, UCAN's recommendations were made in its Opening Brief (Dec. 23, 2015), its Reply Brief (Jan. 11, 2016) and its Comments on the Proposed Decision (August 31, 2016), discussed in more detail below.</p> <p>At issue was the definitions and interpretation of key terms in Section 745(c)(2).</p> <p>1) <u>Economically vulnerable customers</u></p> <p>UCAN recommended, along with other parties, that the Commission take a less limited view of the definition of</p>	<p><i>"Our review of Pub. Util. Code §745 requirements should be performed before considering default TOU rates...[c]onsistent with D.15-07-001, the parties suggest that the Commission's interpretation of Pub. Util. Code §745 requirements can be addressed without testimony or evidentiary hearing...Since Pub. Util. Code §745 definitions are necessary for TOU pilot design and measurement, we also set a schedule for briefing Pub. Util. Code §745 requirements and definitions."</i></p> <p>Assigned Commissioner and Administrative Law Judge's Scoping Memo and Ruling for Phase Three, issued Oct. 15, 2015, pp. 4-5.</p> <p><i>"Section 745(c)(2) is set forth below with key terms underlined.</i></p> <p><i>The Commission shall ensure that any time-of-use rate schedule does not cause <u>unreasonable hardship for senior citizens or economically vulnerable customers in hot climate zones.</u>"</i></p> <p>D.16-09-016 at p. 6.</p> <p>"The issue of economic vulnerability drew considerable difference of opinion for the Working Group members...[w]hile the term 'economically vulnerable customers' needs definition, UCAN believes it</p>	Verified

<p>economically vulnerable customers. Instead of only including those already signed up as CARE and FERA customers, UCAN argued that the Commission should use at a minimum the income standard for CARE and FERA customers to determine who should not be defaulted to TOU. UCAN noted that the definition of this term drew “considerable difference of opinion” for the Working Group members.</p>	<p>would be a mistake for the Commission to interpret the term to mean only CARE and FERA customers...as noted by the Commission, not all ratepayers eligible for CARE or FERA have identified themselves by signing up for the program. Therefore, the Commission should use at a minimum the income standard for CARE and FERA customers to determine who should not be defaulted to TOU, rather than if the customers are actually signed up for the CARE or FERA programs.”</p> <p>UCAN Opening Brief, pgs. 4 and 6; noted in D.16-09-016 at p. 7.</p>	<p>Verified</p>
<p>While the proposed decision found it was only necessary to include customers already enrolled in CARE or FERA programs, the final decision cited to UCAN’s and other parties’ comments on this issue. Based on these comments, the Commission revised its findings.</p>	<p><i>“The proposed decision found...it is only necessary to evaluate the potential hardship on customers who are enrolled in CARE and FERA...In comments on the proposed decision, however, numerous parties (TURN, CforAT, UCAN, CFC) objected to the exclusion of customers who are eligible but not enrolled in these programs...We find the intervenors’ arguments persuasive. This decision finds that evaluation of “economically vulnerable” customers should include customers who are eligible but not enrolled in CARE and FERA.”</i></p> <p>D.16-09-016 at pgs. 8-9, and at p. 33 citing to UCAN’s PD Comments filed August 31, 2016.</p> <p>Conclusions of Law #1</p> <p>Ordering Paragraph #2</p>	<p>Verified</p>
<p>UCAN believes our efforts aided the Commission in coming to its final decision and revising its initial proposed decision findings.</p>		<p>Verified</p>
<p>2) <u>Senior citizens</u></p> <p>UCAN proposed in its Opening Brief that the Commission take an expansive view when defining a senior citizen, whether or not the senior</p>		<p>Verified</p>

<p>citizen is the head of household or customer of record. UCAN noted that the statutory language of Section 745(c)(2) made no distinction between whether a senior was a customer of record, a head of household or a member of a household. UCAN gave examples of a when a senior non head of household could face unreasonable hardships from TOU rates.</p> <p>The Commission agreed with intervenors on this issue. While not citing to UCAN directly, UCAN's argument is similar to the position taken in the final decision. UCAN believes its arguments in its Opening Brief helped develop and enhance the record regarding this issue.</p> <p>3) <u>Hot climate zones</u></p> <p>UCAN argued, unlike other intervenors, that the words "hot climate zones" modified only the term "economically vulnerable customers" and not "senior citizens." UCAN reasoned this was due to the plain meaning and last antecedent rules of statutory construction and legislative intent expressed by Senate floor reports. Citing UCAN's Reply Brief (<i>see</i> D.16-09-016, p. 13, fn. 24), the Commission disagreed with UCAN and pointed out that there were two exceptions to the doctrine of the last antecedent which were</p>	<p>UCAN Opening Brief, pgs. 4-5.</p> <p><i>"Intervenors argue that the standard for 'senior citizen' for purposes of unreasonable hardship review should be broadly construed to include any household customer who certifies that they or a full-time occupant of the household are a 'senior citizen'... We agree with the intervenors. The language of §745 does not expressly limit the evaluation of seniors for unreasonable hardship to customers of record or 'head of household.'"</i></p> <p>D.16-09-016 at pgs. 10-11.</p>	<p>Verified</p> <p>Verified</p> <p>Verified</p> <p>Verified</p>
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<p>applicable here.</p> <p>The Commission found that the phrase in “hot climate zones” applied to “economically vulnerable customers” and “senior citizens.”</p> <p>While not adopting UCAN’s position, UCAN believes its work on this issue enhanced and enriched the record and aided the Commission in its final conclusion on this issue.</p> <p>4) <u>Unreasonable hardship</u></p> <p>UCAN recommended, when determining the economic impacts as a source of hardship caused by default TOU rates, the analysis should include energy burden changes, and did not disagree with other intervenors that the analysis also include bill impacts, load-shifting behavior during hot summer peaks, and impacts on energy insecurity.</p> <p>The Commission agreed with UCAN and other intervenors that all of the numerous pieces of data needed to be evaluated when evaluating economic impacts of default TOU rates.</p>	<p><i>“Both exceptions to the last antecedent doctrine are satisfied here. The phrase in ‘hot climate zones’ applies to ‘economically vulnerable customers’ as well as ‘senior citizens,’ and therefore limits the scope of analysis for unreasonable hardship caused by default TOU rates for both groups.”</i></p> <p>D.16-09-016 at pgs. 13-14.</p> <p>Conclusion of Law #13</p> <p>UCAN Opening Brief, pgs. 6-7.</p> <p><i>“TURN, UCAN and ORA recommend that the analysis of economic impacts include bill impacts, energy burden changes, load-shifting behavior during hot summer peaks, and impacts on energy security... We agree with TURN and other intervenors it is appropriate to consider all of this information when evaluating economic impacts.”</i></p> <p>D.16-09-016 at pgs. 14-15.</p>	<p>Verified</p> <p>Verified</p> <p>Verified</p>
<p>Phase 3: D.17-09-036: Adopting Requirements of CA PUC Sec. 745 for Implementing TOU Rates</p> <p>UCAN reviewed and analyzed the Nexant Report issued April</p>		

<p>11, 2017 that summarized the first interim evaluation of the opt-in TOU pilots. UCAN filed testimony on April 19, 2017 and then participated in the workshops held May 18 and May 22, 2017. UCAN also attended the evidentiary hearing held May 22, 2017 that documented the results of the workshops. UCAN made recommendations in its Opening Testimony (April 19, 2017) Opening Brief (June 14, 2017) and Reply Brief (June 29, 2017). In scope were the next set of issues related to Section 745 and clarifying expectations for a successful roll-out of TOU rates to residential customers (see ALJ Amended Scoping Memo issued January 23, 2017.)</p>	<p>Assigned Commissioner and Administrative Law Judge's Ruling amending Scoping Memorandum and Ruling, issued January 23, 2017.</p>	<p>Verified</p>
<p>1) <u>Do Senior Citizens in Hot Climate Zones Experience Unreasonable Hardship Under TOU Rates?</u></p> <p>After reviewing the Nexant Report, UCAN concluded there was no evidence indicating whole groups of customers should be excluded from TOU. UCAN recommended that only statutorily required customer groups be excluded.</p>	<p>“After having reviewed the evidence in the Nexant report...UCAN sees no evidence justifying exclusions of whole groups of customers based on the results for the Nexant report...UCAN would urge therefor that in the rollout of the default pilot that the Commission only exclude those groups that are statutorily required to be excluded.”</p>	<p>UCAN Opening Brief, p. 5.</p>
<p>The decision noted UCAN’s position on p. 10, and included UCAN’s reasonings that existing customer protections in Section 745 further supported the conclusion that no additional customer groups</p>	<p><i>“UCAN states that it sees no evidence justifying the exclusions of whole groups of customers based on the Nexant Report. UCAN states that the customer protections in Section 745,</i></p>	<p>Verified</p>

<p>need to be excluded from default TOU.</p>	<p><i>such as the ability of customers to opt out of default TOU and receive bill protection, also support the conclusion that no additional customers groups need to be excluded from default TOU.”</i></p>	
<p>The final decision agreed with UCAN and other parties that the opt-in pilot data did not suggest that households with seniors in hot climate zones experienced unreasonable economic or health and safety hardship on TOU rates.</p>	<p>D.17-09-036 at p. 10, fn. 24, citing UCAN Opening Brief, p 5.</p> <p><i>“We agree with parties that the opt-in pilot data does not suggest that households with seniors experience unreasonable economic or health and safety hardship on TOU rates. These facts...support the conclusion that seniors do not experience unreasonable hardship while on TOU rates. Therefore, we do not find a basis for excluding senior citizens in hot climate zones from default TOU...”</i></p>	<p>Verified</p>
	<p>D.17-09-036 at p. 11.</p> <p>Findings of Fact #1</p> <p>Conclusions of Law #1</p>	<p>Verified</p> <p>Verified</p> <p>Verified</p>
<p>2) <u>Do CARE/FERA Customers in Hot Climate Zones Experience Unreasonable Hardship?</u></p> <p>UCAN determined that the Nexant report did not provide enough data to draw any conclusions about how customers would respond to being migrated to the default TOU rate.</p>	<p>“UCAN found that the Nexant report offers a trove of data on customer reactions to the Opt-In pilots. However...extrapolating the pilot results to a default TOU setting has limitations...Given that the Nexant interim results involves only a few summer months of data, few if any conclusions can be drawn about how customers will respond to being migrated to the default TOU rate, including whether they will opt out to the redesigned tiered rate, or whether they will reduce load or shift energy use to off-peak hours.</p>	
<p>The decision noted UCAN’s position on p. 15, and while including a discussion of other</p>	<p>UCAN Opening Brief pgs. 5, 6.</p>	<p>Verified</p>

<p>party positions, the Commission found that the available evidence was insufficient to conclude that economically vulnerable customers in hot climate zones do not experience unreasonable economic hardship due to TOU rates.</p>	<p><i>“UCAN does not advance a position on potential economic hardship at this time and believes that existing opt-in pilot data is insufficient to draw conclusions about how customers will respond to default TOU as the date only represents a few summer months.”</i></p> <p>D.17-09-036 at p. 15, fn. 45, citing UCAN Opening Brief at 6.</p>	<p>Verified</p>
<p>UCAN believes our efforts and analysis aided the Commission in coming to its final conclusion regarding this issue.</p>	<p><i>“We find that the available evidence is insufficient to conclude that economically vulnerable customers in hot climate zones do not experience unreasonable economic hardship due to TOU rates...further study and evaluation is warranted prior to making a determination on the issue of unreasonable economic hardship.”</i></p> <p>D.17-09-036 at p. 17.</p> <p>Findings of Fact #9</p>	<p>Verified</p>
<p>3) <u>Do CARE/FERA Eligible Customers in Hot Climate Zones Experience Unreasonable Health or Safety Hardship on TOU Rates?</u></p> <p>As with the previous issue, UCAN maintained there was not enough data to draw conclusions regarding how customers will respond to default TOU rates and whether any unreasonable health and/or safety impacts would result.</p>	<p>UCAN Opening Brief, pgs. 5, 6.</p>	<p>Verified</p>
<p>Noting UCAN’s position at p. 19, the Commission agreed that there was insufficient evidence to make any conclusions about</p>	<p><i>“UCAN reiterates its position that existing opt-in pilot data is insufficient to draw conclusions regarding how customers will respond to default TOU</i></p>	

<p>unreasonable health and/or safety hardships for economically vulnerable customers in hot climate zones and that the issue would be considered in the 2018 RDWs.</p>	<p><i>rates and whether TOU rates cause unreasonable health and/or safety impacts.”</i></p> <p>D.17-09-036 at p. 19, fn. 52, citing UCAN Opening Brief at 5-6.</p>	<p>Verified</p>
<p>4) <u>Should Economically Vulnerable Customers Be Excluded from Default TOU?</u></p> <p>UCAN, along with SCE, SDG&E and ORA, argued that with the right to opt-out, receive bill protection, and the marketing, education and outreach (ME&O) campaign were sufficient to ensure that default TOU rates would not cause unreasonable hardship for economically vulnerable customers. Therefore, UCAN recommended against excluding economically vulnerable customers from TOU rates.</p> <p>The Commission noted UCAN’s and other party positions that there were adequate choices and built-in protections for economically vulnerable customers. However, the Commission</p>	<p><i>“We find that the available evidence is insufficient to conclude that TOU rates to not cause unreasonable health and/or safety hardship for economically vulnerable customers in hot climate zones...Therefore, as contemplated in the Amended Scoping Memo, the Commission will further consider this issue in the 2018 RDWs based on the actual rates proposed in the RDWs and based on additional data from the opt-in pilots..”</i></p> <p>D.17-09-036 at pgs. 19, 20.</p> <p><i>“Care must be taken to ensure that the vulnerable customers...are protected from unreasonable hardship. However, the need for such protections depends on the choices available to customers...To ensure that customers have the tools and information to successfully operate on the TOU rate, marketing, education and outreach <u>is especially critical</u>...bill protection can offer necessary safeguards against adverse bill impacts...”</i></p> <p>UCAN Opening Brief, pgs. 5-6.</p> <p>D.17-09-036 at p. 21, fn. 58, citing UCAN Opening Brief, pgs. 9-10.</p>	<p>Verified</p> <p>Verified</p> <p>Verified</p> <p>Verified</p>

<p>shared the concerns expressed by other parties regarding high summer bill impacts for economically vulnerable customers who have not demonstrated an ability to shift load and mitigate these impacts. Therefore, the Commission excluded CARE/FERA eligible customers in hot climate zones from all three of the IOU's default pilots.</p> <p>While not adopting UCAN's recommendation, UCAN believes its efforts aided and enhanced the record and assisted the Commission in coming to its final conclusion on this issue.</p>	<p><i>"We share the concerns articulated by PG&E, TURN and CforAT regarding the high summer bill impacts for economically vulnerable customers who have not demonstrated an ability to shift load and mitigate these bill impacts...Therefore, to ensure that economically vulnerable customers do not experience unreasonable economic hardship on TOU rates, we exclude CARE/FERA eligible customers in hot climate zones from all three of the IOU's default pilots."</i></p> <p>D.17-09-036 at p. 22.</p> <p>Conclusions of Law #s 2-5.</p>	<p>Verified</p>
<p>5) <u>Section 745(c)(4) and the term "Initial Default TOU Migration" (IDTM).</u></p> <p>In Opening Testimony, UCAN supported the definition in the Amended Scoping Memo for the term "Initial Default TOU Migration" (IDTM). The Commission also agreed with this definition.</p> <p>In deciding how to implement Section 745(c)(4), UCAN supported the approach offered by PG&E for new customers who start service with an IOU (engage customer in conversation about selecting best rate; default to TOU if no</p>	<p><i>"The Amended Scoping Memo defined the IDTM as "the period of time starting on the date the specific IOU begins migrating customers to default TOU and ending one year later." PG&E, SDG&E, ORA and UCAN support this definition...For the purposes of resolving Section 745(c)(4) implementation issues in today's decision, we use the definition of the IDTM proposed in the Amended Scoping Memo."</i></p> <p>D.17-09-036 at p. 35, fn. 91, citing Exh. UCAN-301 at 17.</p> <p><i>"ORA and UCAN support PG&E's approach for new customers who start</i></p>	<p>Verified</p>

<p>rate is chosen). However, UCAN argued that if the customer transferred service to a new location with the same service territory, the IOU should retain the customer's rate choice from the previous location.</p> <p>The Commission disagreed with UCAN's position regarding transfer of service believing it would be difficult and costly for the IOUs to track a customers' rate choice in this way.</p> <p>While not adopting UCAN's position on this issue, UCAN feels its work in this area aided and enhanced the record, helping the Commission come to its final decision.</p>	<p><i>service with an IOU, but argue that the IOUs should retain a customer's rate choice if that customer transfers service to a new premise within the same territory."</i></p> <p>D.17-09-036 at p. 36, fn. 95, citing Exh. UCAN-301 at 19.</p>	<p>Verified</p>
<p>While not adopting UCAN's position on this issue, UCAN feels its work in this area aided and enhanced the record, helping the Commission come to its final decision.</p>	<p><i>"With respect to customers who transfer service to a new premise within the same service territory, we find it unnecessary to require IOUs to implement potentially difficult and costly processes to track a customers' rate change across premises given the potential for a customer's load and usage patterns to change across premises."</i></p> <p>D.17-09-036 at p. 38.</p>	<p>Verified</p>
<p>6) <u>One Year of Bill Protection</u></p> <p>Contrary to the IOUs, UCAN and ORA argued that bill protection should be made available for opt-in TOU rates and not be limited to just the default TOU rate.</p> <p>While agreeing with UCAN in part, the Commission determined that bill protection should not be provided for customers enrolling in an opt-in TOU rate reasoning that this would be less expensive for the IOUs.</p> <p>Although not adopting</p>	<p><i>"All IOUs argue that bill protection should be limited to the default TOU rate and should not apply to any optional TOU rates...ORA and UCAN argue that bill protection should be made available for opt-in TOU rates."</i></p> <p>D.17-09-036 at p. 41, fn. 104, citing UCAN Opening Brief at 6-7.</p> <p><i>"Although we find that bill protection need not be provided to customers enrolling in an optional TOU rate, we find that bill protection should be provided to customers that opt-in to the default TOU rate during the</i></p>	<p>Verified</p>

<p>UCAN's recommendation, UCAN believes its efforts in examining this issue and making a different recommendation than the IOUs enriched the discussion and helped the Commission reach its final conclusion on this issue.</p>	<p><i>IDTM...Moreover, unlike with more complex TOU rates, offering bill protection to these customers will not entail much additional expense because the IOU's systems will already be programmed to offer bill protection for the default TOU rates."</i></p> <p>D.17-09-036 at pgs. 42-43.</p>	<p>Verified</p>
<p>Phase 3: D.17-12-023: Addressing Statewide Marketing, Education and Outreach (ME&O) for Residential Rate Reform (RRR).</p> <p>1. Separate Consultants</p> <p>In its Comments filed on the Proposed Decision December 4, 2017 UCAN supported using separate consultants for implementation and evaluation of the ME&O campaign.</p>	<p>"While the plan seems sound, its implementation may be difficult to achieve without a centralized hierarchical management structure rather than a more decentralized implementation structure...We support the continuation of DDB for the strategy and content aspects of the overall ME&O campaign...But we also understand why an RFP to identify alternative consultants can benefit the implementation and evaluation process by obtaining a diverse number of proposals with detailed work plans and budgets, pertaining to the phase of the Scope of Work."</p>	<p>Verified</p>
<p>The Commission agreed with parties' concerns and revised the proposed decision.</p> <p>2. Key Performance Indicators (KPIs)</p> <p>UCAN supported IOU proposals to include KPIs in</p>	<p>UCAN PD Comments, pgs. 3 and 5.</p> <p><i>"We agree that a consultant tasked with a deliverable should not also be tasked with evaluation of that deliverable. Therefore, the PD has been modified to require a separate consultant for the evaluation work. Neither DDB nor the consultant selected for the implementation work shall be permitted to participate in the RFP for the evaluation work."</i></p> <p>D.17-12-023 at p. 50.</p> <p>"...UCAN agrees with the recommendation to withhold DDB funding if certain performance measures</p>	<p>Verified</p>

<p>the amended contract.</p>	<p>[KPIs] are not achieved. UCAN agrees that funding should be performance-based and failure should either require withholding of funding or a change in the approach to statewide messaging either by the consultant or the utilities.”</p>	<p>Verified</p> <p>UCAN Reply Comments on PD, p. 3.</p>
<p>The Commission agreed with the IOU proposals and modified the Proposed Decision.</p>	<p><i>“We agree that KPIs should also be used to track and evaluate DDB’s performance for statewide rate reform ME&O and the PD has been modified to require KPIs for this work.”</i></p>	<p>Verified</p> <p>D.17-12-023 at p. 51.</p>
<p>UCAN also raised concerns about coordinating the timing and content of the statewide ME&O campaign with the utility-specific ME&O campaigns and suggested an alternative path forward.</p>	<p>“An alternative to the two-pronged approach might be to provide principles, guidelines and key message points by sector at the statewide level. Actual communication and customer contact may be better left to the local utilities which have a better send of the various residential segments and how best to communicate to each of them.”</p>	<p>Verified</p> <p>UCAN PD Comments, pgs. 2-3.</p>
<p>While not agreeing with UCAN’s alternative approach, the decision cited to UCAN’s concerns and clarified the coordination and integration work of the consultants with the IOUs and CBO.</p> <p>UCAN believes its recommendation, while not adopted, helped clarify the record on the role and expectations of the statewide consultants. UCAN believes its contribution aided the Commission with its final decision on this issue.</p>	<p><i>“UCAN raises concerns regarding the coordination between the statewide ME&O and utility-specific ME&O campaigns and proposes that an alternative to the two-track approach might be for principles, guidelines, and key message points to be developed at the statewide level with actual communication and customer contact being provided by the local utilities. As explained in the PD, it is necessary for certain messaging to be delivered by a neutral statewide messenger whereas some information would need to be provided by the IOU. We note that the work of the statewide consultant includes coordination and integration of</i></p>	

	<p><i>strategies across all partner channels, including IOUs and CBOs.”</i></p> <p>D.17-12-023 at p. 54.</p>	Verified
Phase 4: D.19-04-018: Denying SDG&E PFM for HUC Suspension		
In its Response to SDG&E’s PFM, UCAN supported the request to suspend the HUC out of concern for ratepayers, arguing that in practice the HUC affected a much larger portion of residential customers than anticipated.	“UCAN supports SDG&E’s petition to suspend the HUC out of concern for the fair and reasonable treatment of residential customers...Unfortunately, as SDG&E points out in its petition, in practice the HUC affected a much larger portion of residential customers, larger than even the percentages contemplated for a third tier.”	
UCAN argued that a more fair and equitable way forward was to suspend the HUC and instead continue to examine an alternative approach to reach the goal of a HUC (conservation signal).	UCAN Response to SDG&E PFM, pgs. 2-3. “...UCAN maintains that granting the suspension while continuing to more fully examine alternatives to reach the stated goal of the HUC (a price signal to conserve) is the best option for San Diego ratepayers at this time.”	Verified
UCAN included excerpts from what ratepayers wrote on UCAN’s website regarding the impact of the HUC.	UCAN Reply to Responses to SDG&E PFM, pgs. 1-2.	Verified
The Commission noted UCAN and SDG&E’s attention to the individual customer experiences. However, the Commission did not agree that the data was robust enough to support elimination of the HUC and that eliminating the HUC would only raise rates and average bills for all non-HUC customers.	UCAN Reply to Responses to SDG&E PFM, pgs. 2-3. “ <i>The Commission appreciates the focus of UCAN and SDG&E on individual customer experiences. Unfortunately, the data provided by SDG&E in its reply does not indicate how much of the change in the bills for the 13 customers was due to the HUC, or due to increases in usage overall.</i> ”	Verified
	D.19-04-018 at 10-11, and see fn. 29 citing to UCAN Reply at 2-3.	Verified

<p>The Commission felt the better solution was to explore TURN's proposal to eliminate seasonal differentiation by having SDG&E submit a rate design application by November 30, 2019 seeking to eliminate the seasonal differentiation in all of its residential rates.</p> <p>While not agreeing with UCAN's position, UCAN feels its work informed the record and help the Commission come to its final conclusion.</p>	<p>D.19-04-018 at 15.</p>	<p>Verified</p>
	<p>End of Part II, Section A</p>	<p>Verified</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>	Yes	Verified
<p>b. Were there other parties to the proceeding with positions similar to yours?</p>	Yes	Verified
<p>c. If so, provide name of other parties: The Utility Reform Network (TURN) Center for Accessible Technologies (CforAT) Consumer Federation of California (CFC) </p>		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.

<p>d. Intervenor's claim of non-duplication:</p> <p>This proceeding, which began in June of 2012 and ended in March of 2020 after five phases, took on a multitude of issues addressing residential rate reform. There were numerous parties throughout the five phases examining the various complex issues related to rate reform with parties agreeing on some issues and disagreeing on others. For example, on the issue of whether to include only customers already on the CARE and FERA programs in the meaning of "economically vulnerable," UCAN, TURN, CforAT and CFC made the same arguments that customers who are eligible for the CARE and FERA programs but not enrolled should also be included. (The Commission agreed with these arguments.) However, on the issue of whether the term "hot climate zones" modified both the terms "senior citizens" and "economically vulnerable customers," UCAN was alone in arguing that it modified only the "economically vulnerable" part of the sentence and not the "senior citizen" part of the sentence. This would have broadened the meaning of Section 745(c)(2) and in particular the term "senior citizen." Because UCAN was the only party to advocate this position, the Commission was provided a unique argument to examine regarding the interpretation of Section 745(c)(2). (The Commission disagreed with UCAN on this issue.) On another issue in Phase 4 on whether to eliminate the High Usage Charge (HUC), UCAN supported SDG&E in its Petition for Modification (PFM) to eliminate it while TURN and CforAT did not support SDG&E's PFM. (The Commission disagreed with UCAN on this issue.) These examples show that the parties raised a variety of arguments on a multitude of issues providing the Commission with various analyses with which to evaluate the issues and determine its findings. Because none of the parties were aligned on all of the issues, yet all parties provided analysis and discussion on certain issues, duplication of effort was kept to a minimum. Due to the complexity and multitude of issues addressed in each phase of this proceeding, UCAN urges the Commission to find any duplication of efforts was minor and therefore reasonable.</p>	<p>Noted</p>
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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>UCAN is requesting reimbursement for \$247,116.61. This amount includes time for UCAN's attorney in the Phase 3 decisions as well as UCAN's outside expert, an energy economist with 30-years' experience who is also a retired former SDG&E executive. The amount also includes time for UCAN's representative in the Phase 4 decision.</p>	<p>See discussion in Part III.D, below.</p>

The Residential Rate Reform (RRR) proceeding was an ambitious undertaking by the Commission to reform the long-used tiered rate structure into one that would “make rates more understandable to customers and more cost-based, and to encourage residential customers to shift usage to times of day that support a cleaner more reliable grid.” (D.15-07-001, p. 2) As noted above, UCAN joined this proceeding to represent and protect the interests of San Diego ratepayers from unreasonable rateshock during the transition to TOU rates. Given the large amount of material UCAN reviewed, researched and submitted, and given the quality of our work product and the substantial contributions UCAN made in the Phase 3 and 4 decisions (*see Part II, Section A above*), we ask that the Commission grant the full amount of compensation requested.

San Diego ratepayers benefited from UCAN’s participation because UCAN advocated to include more customers in the unreasonable hardship review of the TOU rate schedules. For example, UCAN argued to include not only customers already enrolled in the CARE/FERA programs, but customers who were eligible but not enrolled. (*see above* Phase 3 D.16-09-016, Issue 1). UCAN also advocated to include not just head-of-household senior citizens, but any household member who certifies as a senior citizen. (*see above* Phase 3 D.16-09-016, Issue 2). UCAN also helped expand the definition of “economic impacts” (of default TOU) to include bill impacts, energy burden charges, load shifting behavior during hot summer peaks and impacts on energy insecurity (*see above* Phase 3 D.16-09-016, Issue 4). In addition, ratepayers received more accountability for money spent on the statewide marketing, education and outreach (ME&O) campaign with the idea to use separate consultants for implementation and evaluation of the campaign. UCAN also advocated for key performance indicators to ensure the money spent was being tracked and monitored (*see above* Phase 3 D.17-12-023, Issues 1 & 2).

Additionally, when possible, UCAN made an effort to minimize expenses. For example, for the TOU Working Group meetings August 23-25, 2016 and February 21-23, 2017 Mr. Kelly flew through San Jose and stayed with his parents to avoid lodging expenses.

Given the Commission’s consideration of many issues that UCAN advocated for (described in Part II, Section A above) and adoption of UCAN’s positions, UCAN believes the \$247,116.61 cost of participation is reasonable.

b. Reasonableness of hours claimed:

UCAN is requesting reimbursement of 330.25 of hours for Mr. Kelly, 336.33 hours for Mr. Croyle, and 64.75 hours for Ms. Krikorian for their substantive work in this proceeding. The amounts listed here are for hours spent examining the issues and exclude the hours spent by Mr. Kelly and

See discussion in Part III.D, below.

Mr. Croyle to travel from San Diego to the Commission for hearings and workshops. The hours also exclude time claimed for NOI and intervenor compensation request preparation.

The RRR proceeding is important to ratepayers because until SB 695 was passed in 2009 allowing a transition to TOU rates, residential customers were under a five-tiered, increasing block rate structure with Tiers 1 and 2 capped at 2001 levels and three tiers for usage above 130 percent of baseline that were uncapped (see R.12-06-013 *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*, filed June 21, 2012, pgs. 4-5) This was causing unreasonably increasing high bills on households that when living in hotter climate zones used more electricity. Using more electricity pushed them into the upper tiers that were getting more expensive while the lower tiers were frozen. Transitioning to TOU was meant to ensure that for the foreseeable future rates were more equitable and affordable. However, the transition to TOU had the potential to cause unreasonable rateshock to many residential customers in the San Diego Gas & Electric territory if not closely monitored and evaluated.

Due to the complexity of transitioning to default TOU rates, UCAN's staff and expert sought a thorough examination of the issues. Mr. Kelly, Mr. Croyle and Ms. Krikorian crafted sensible and sound arguments that aided the Commission to revise the transition to TOU in a manner fairer to all ratepayers and in particular, some of the more vulnerable ratepayers. Given the importance of this proceeding to San Diego ratepayers and the fact that several of the concepts UCAN advocated for were included in the decisions, UCAN believes the total amount of hours requested for reimbursement is reasonable.

c. Allocation of hours by issue:

Total Hours	% of Hours per Issue	Issue
12.5	2%	1. General Prep (GP)
43.58	60%	2. Hearings, Workshops, and Conferences (HWC)
23	32%	3. Filings (F)

Noted

5								
0	0%	4. Discovery (D)						
31	4%	5. Testimony (T)						
3. 75	1%	6. Coordination (C)						
7. 5	1%	7. Evidentiary Hearings (EH)						
1. 25	0%	8. Settlement (S)						
72	100							
8. 58	%							

B. Specific Claim:*

CLAIMED					CPUC AWARD			
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Donald Kelly	2015	56.75	\$335	D.16-10-033	\$19,011.25	56.75	\$335	\$19,011.25
Donald Kelly	2016	169.5	\$340[1]	D.16-06-028 D.18-01-021	\$60,172.50	169.5	\$355[1]	\$60,172.50
Donald Kelly	2017	94	\$355[1]	D.17-05-029 D.18-01-021	\$34,310.00	94	\$365[1]	\$34,310.00
Donald Kelly	2018	10	\$375	D.18-06-024	\$3,750.00	10	\$375	\$3,750.00
David Croyle	2015	119	\$245	D.16-05-045	\$29,155.00	119	\$245	\$29,155.00
David Croyle	2016	155.5 8	\$250	D.16-06-028 D.18-01-021	\$38,895.00	155.58	\$250	\$38,895.00
David Croyle	2017	61.75	\$250	D.16-06-028	\$15,437.50	61.75	\$250	\$15,437.50

				D.18-01-021				
Jane Krikorian	2018	11.25	\$200	D.19-04-038	\$2,250.00	11.25	\$200	\$2,250.00
Jane Krikorian	2019	53.5	\$215	D.20-02-020	\$11,502.50	53.5	\$215	\$11,502.50
Courtney Cook	2016	.25	\$150	D.18-06-024 D.19-04-038	\$37.50	0.25	\$150	\$37.50
							Subtotal: \$214,521.25	
							15% Reduction: -\$32,178.19[2]	
							New Subtotal: \$182,343.06	

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 \$
Donald Kelly	2015	8.5	\$167.5	D.16-10-033	\$1,423.75	8.5	\$167.50	\$1,423.75
Donald Kelly	2016	62.75	\$170[1]	D.16-06-028 D.18-01-021	\$11,138.13	62.75	\$177.50[1]	\$11,138.13
Donald Kelly	2017	41.75	\$177.5[1]	D.17-05-029 D.18-01-021	\$7,828.13	41.75	\$187.50[1]	\$7,828.13
Jane Krikorian	2018	18.5	\$100	D.19-04-038	\$1,850.00	18.5	\$100	\$1,850.00
							Subtotal: \$22,031.25	
							Subtotal: \$22,240.01	

INTERVENOR COMPENSATION CLAIM PREPARATION **

Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Jane Krikorian	2019	.75	\$107.5	D.20-02-020	\$80.63	0.75	\$107.50	\$80.63
Jane Krikorian	2020	27	\$132.5	See Comment 1	\$3,577.50	27	\$132.50[3]	\$3,577.50

Courtney Cook	2017	.25	\$77.5	D.18-06-024	\$19.38	0.25	\$77.50	\$19.38			
Courtney Cook	2018	.75	\$80	D.18-06-024	\$60.00	0.75	\$80	\$60.00			
Courtney Cook	2020	1.5	\$85	D.20-02-020	\$127.50	1.5	\$85	\$127.50			
<i>Subtotal: \$3,865.00[4]</i>						<i>Subtotal: \$3,865.01</i>					
COSTS											
#	Item	Detail		Amount	Amount						
1.	Travel, Copy, Misc.	Travel expenses, copy charges and other misc. charges.		\$6,699.11	\$6,699.11						
<i>Subtotal: \$6,699.11</i>						<i>Subtotal: \$6,699.11</i>					
<i>TOTAL REQUEST: \$247,116.61</i>					<i>TOTAL AWARD: \$215,147.19[5]</i>						

*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 ³	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Donald Kelly	December 5, 1990	151095	No

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

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
1	Ms. Krikorian's approved rate for 2019 is \$215/hr (D.20-02-020). Ms. Krikorian

³ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

	<p>graduated law school in 2010 and has 10 years of legal experience. For the past seven years she has been working at UCAN steadily increasing her responsibilities and practice experience before the Commission. Based on this education and experience, we are asking for a transition into the mid-range of the 7-12 year experience category, resulting in a 2020 rate of \$265/hr. Ms. Krikorian received one step increase in the first experience category, one COLA adjustment in 2017 (D.18-06-024) and another COLA adjustment in 2019 (D.20-02-020). Thus, this request is consistent with guidelines for setting hourly rates provided in D.07-01-009 and D.08-04-010.</p> <p>Since becoming Regulatory Program Manager for UCAN, Ms. Krikorian's increased responsibilities include managing UCAN's advocacy efforts on behalf of utility ratepayers before the Commission. This has resulted in increased involvement in each of UCAN's proceedings, including filing protests, utilizing discovery, directing the work of expert consultants and witnesses, submitting testimony, cross examining witnesses in hearings, attending workshops, participating in negotiations and settlement discussions, writing briefs and submitting comments on Commission issues and proposed decisions. Ms. Krikorian works with other UCAN staff members to manage and develop positions on emerging issues in energy policy and ratemaking, and the advocacy of those positions before the Commission.</p> <p>Ms. Krikorian's background includes extensive legal research experience including two years (2008-2010) as a law clerk for constitutional law professor Michal R. Belknap while in law school at California Western School of Law. More recently, Ms. Krikorian increased her knowledge and skills by participating in a 12-week Fundamentals of Utility Law webinar course taught by Professor Scott Hempling, adjunct professor at Georgetown University Law Center and author of "Regulating Public Utility Performance: The Law of Market Structure, Pricing and Jurisdiction" (American Bar Association 2013). Due to Ms. Krikorian's education and experience, the requested rate of \$265 is justified and places Ms. Krikorian within the mid-range approved for her experience level (\$185-\$305 for 7-12 years, per Resolution ALJ-357, April 8, 2019).</p>
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D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1]	<p>An arithmetic error was found during the verification of the requested rates of Mr. Kelly for the years of 2016 and 2017. Upon further review, D.18-06-024 reflected Mr. Kelly had been previously approved for the following rates:</p> <p>2016: \$355.00</p> <p>2017: \$365.00</p> <p>2018: \$375.00</p> <p>We have applied the 2016-2018 rates consistent with D.18-06-024 for Mr. Kelly.</p>

[2]	<p>As noted by UCAN, many of its positions in this proceeding duplicated that of other intervenors. While we find UCAN did provide some unique analyses, we find UCAN's claimed costs to be excessive when considering the compensation awarded to other intervenors for comparable contributions to the same decisions⁴. Therefore, we find it reasonable to reduce the Attorney, Expert and Advocate Fees subtotal by 15% for a revised subtotal of \$182,343.06.</p> <p>\$214,521.25 - \$32,178.19 = \$182,343.06</p>
[3]	<p>After verifying Ms. Krikorian's experience of 10-11 years, we find the requested 2020 rate of \$265.00 to be reasonable.</p>
[4]	<p>Correct subtotal is \$3,865.01.</p>
[5]	<p>Revised total of \$215,147.19, based on adjustment discussed in Item 2 above. $\\$247,325.38 - \\$32,178.19 = \\$215,147.19$.</p>

PART IV: OPPOSITIONS AND COMMENTS

Within 30 days after service of this Claim, Commission Staff or any other party may file a response to the Claim (see § 1804(c))

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. Utility Consumers' Action Network has made a substantial contribution to D.16-09-016, D.17-09-036, D.17-12-023, and D.19-04-018.
2. The requested hourly rates for Utility Consumers' Action Network'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 \$215,147.19.

CONCLUSION OF LAW

⁴ See, e.g. D.20-01-017; D.19-12-053; D.19-10-052; D.19-02-017; D.18-09-040.

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

ORDER

1. Utility Consumers' Action Network shall be awarded \$215,147.19.
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 Company, shall pay Utility Consumers' Action Network their respective shares of the award, based on their California-jurisdictional electric revenues for the 2016 calendar years to reflect the years 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 Utility Consumers' Action 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):	D1609016, D1709036, D1712023, D1904018		
Proceeding(s):	R1206013		
Author:	ALJs Doherty and Park		
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
Utility Consumers' Action Network	June 1, 2020	\$247,116.63 <u>\$247,116.61</u>	\$215,147.19	N/A	See CPUC Comments, 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
Donald	Kelly	Attorney	2015	\$335	\$335
Donald	Kelly	Attorney	2016	\$340	\$355
Donald	Kelly	Attorney	2017	\$355	\$365
Donald	Kelly	Attorney	2018	\$375	\$375
David	Croyle	Expert	2015	\$245	\$245
David	Croyle	Expert	2016	\$250	\$250
David	Croyle	Expert	2017	\$250	\$250
Jane	Krikorian	Advocate	2018	\$200	\$200
Jane	Krikorian	Advocate	2019	\$215	\$215
Jane	Krikorian	Advocate	2020	\$265	\$265
Courtney	Cook	Advocate	2016	\$150	\$150
Courtney	Cook	Advocate	2017	\$155	\$155
Courtney	Cook	Advocate	2018	\$160	\$160
Courtney	Cook	Advocate	2020	\$170	\$170

(END OF APPENDIX)

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