

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Examine
Electric Utility De-Energization of Power
Lines in Dangerous Conditions.

Rulemaking 18-12-005

**DECISION GRANTING COMPENSATION TO
SMALL BUSINESS UTILITY ADVOCATES
FOR SUBSTANTIAL CONTRIBUTION TO
DECISION (D.) 19-05-042 AND D.20-05-051**

Intervenor: Small Business Utility Advocates	For contribution to: D.19-05-042, D.20-05-051
Claimed: \$50,503.50	Awarded: \$50,988.75
Assigned Commissioner: Marybel Batjer	Assigned ALJ: Brian Stevens, Marcelo Poirier, Valeria Kao, Regina DeAngelis ¹

¹ ALJ Kao and ALJ DeAngelis were co-assigned on March 10, 2021.

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	<p>D.19-05-042 (“Phase 1 Decision”) adopts communication and notification guidelines for public safety power shut-offs (PSPS events). PSPS events are initiated by a utility when it believes that the threat of a wildfire has reached such a level that the de-energization of power lines is necessary in order to reduce the likelihood that utility infrastructure will cause or contribute to a wildfire’s destructiveness.</p> <p>D.20-05-051 (“Phase 2 Decision”) adopts additional PSPS guidelines to expand on Resolution ESRB-8 and D.19-05-042 specifically in the areas of working groups and advisory boards; planning exercises; notice standards; community resource centers; rapidly restoring power after PSPS events; transportation, communications and water system resilience; medical baseline and access and functional needs populations; and transparency.</p>
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:²

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	February 19, 2019	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	March 21, 2019	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.18-11-005	Verified
6. Date of ALJ ruling:	June 24, 2019	Verified
7. Based on another CPUC determination (specify):		

² All statutory references are to California Public Utilities Code unless indicated otherwise.

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.18-11-005	Verified
10. Date of ALJ ruling:	June 24, 2019	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.19-05-042, D.20-05-051	Verified
14. Date of issuance of Final Order or Decision:	June 4, 2019 (D.19-05-042), June 5, 2020 (D.20-05-051)	Verified
15. File date of compensation request:	August 4, 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):

D.19-05-042 (PHASE 1)

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>1. Definitions</p> <p>SBUA provided recommendations on definitions related to medical baselines, alerts and warnings, and vulnerable communities. SBUA argued that defining vulnerable populations as customers participating in the medical baseline program was too restrictive. SBUA was one of the few parties that provided recommendations on the</p>	<p>Phase 1 Decision, at 28-29 (“SBUA agrees that vulnerable populations should include Medical Baseline customers, but the Commission should also consider using the definition of ‘hard to reach’ customers as defined in D.18-05-041.”).</p> <p>Phase 1 Decision, at 30 (“CSAC, CforAT, POC, CCSF, SBUA and others disagree that medical baseline is an appropriate proxy for 2019. ... SBUA recommends prioritizing residential and small commercial customers residing in disadvantaged communities for the 2019 fire season.”).</p>	Verified

<p>California Alert and Warning Guidelines Plan (CalPAWS) and definitions for “alerts”, “watches”, “warnings”, and “notifications.” SBUA also advocated to prioritize disadvantaged communities and for the inclusion of hard-to-reach customers in the Commission’s definition of “vulnerable populations.” Finally, SBUA highlighted the need to provide clarification on terms used in the final de-energization guidelines, as certain phrases including “as soon as practicable” are ambiguous.</p> <p>The Commission discussed SBUA’s positions and addressed many of SBUA’s concerns. The Commission agreed with SBUA and others that medical baseline should not be synonymous with vulnerable customers. The Commission supported the use of CalPAWS standards. The Commission did not include hard-to-reach customers in any adopted definition, as SBUA recommended; however, SBUA submits its position on this was valuable advocacy on behalf of small business and created a more robust record before the Commission.</p>	<p>Phase 1 Decision, at 43-44 (“SBUA recommends the following definitions: (1) Alerts: communicating that conditions in the coming days may result in de-energization. Alerts may continue for several days without other action; (2) Watches: announcing that potentially dangerous conditions are emerging and encouraging customers to begin preparations; (3) Warnings: predicting that the utility expects to de-energize; and (4) Notifications: reporting actual de-energization.”).</p> <p>Phase 1 Decision, at 50 (SBUA provided recommendations on the CalPAWS definitions of alert, warning, and notifications).</p> <p>Phase 1 Decision, at 77 (“[T]he Commission adopts a definition that comports with that used by CALOES and will henceforth refer to vulnerable populations as populations with access and functional needs (AFN populations)” and “at this juncture takes a broad approach to defining AFN populations”), at 78 (identifying “AFN populations is an ongoing process”), at 81 (“[m]ost parties support an expanded definition of AFN populations” and identifying AFN populations “will be an ongoing endeavor, and the Commission will explore identification of and notification methods to AFN populations more fully in Phase 2”); A12 (AFN populations include but are not limited to customers on medical baseline).</p> <p>Phase 1 Decision, Conclusions of Law #23, at 123 (“The electric-owned utilities should partner with state and local public safety partners to develop notification strategies that comport with the California Alert and Warning Guidelines.”), A1 (IOUs must develop and use a common nomenclature that integrates with existing state and local emergency response communication messaging and outreach and is aligned the California Alert and Warning Guidelines.”); <i>see also</i> A15-A18 (incorporating use of CalPAWS standards).</p> <p>SBUA Comments on OIR (Feb. 4, 2019), at 6 (vulnerable populations should encompass both customers who live in areas the state has</p>	<p>Verified</p>
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<p>SBUA made numerous recommendations to expand on and improve notification procedures and outreach. SBUA argued for strong coordination between all relevant groups (the public, local governments, critical facilities, and emergency/first responders) and to notify all relevant groups as soon as possible of de-energization events, including government bodies, and not only focus on first responders. SBUA supported providing notice 2-4 days prior to an event. SBUA submitted that outreach should be done in multiple languages and be done through various mediums, to ensure customers receive all relevant information. SBUA supported education campaigns and outreach in advance of the wildfire season. SBUA also supported enhanced outreach and in-person contact for vulnerable and hard-to-reach customers.</p> <p>In D.19-05-042, The Commission adopts strong notification and outreach requirements, responsive to and addressing many of SBUA’s and other parties’ concerns. In D.19-05-042, the Commission also rules deenergization should be communicated by multiple methods and all viable means (television, social media, phone calls and texts, in person, etc.); requires</p>	<p>customers residing in disadvantaged communities for the 2019 fire season.”).</p> <p>Phase 1 Decision, at 33-34 (“SBUA recommends that the utilities should notify governmental bodies beyond first responders.”).</p> <p>Phase 1 Decision, at 49-50 (indicating SBUA emphasizes “coordinated education campaigns in advance of wildfire season.”).</p> <p>Phase 1 Decision, at 97 (“De-energization should be communicated by all available means including, but not limited to, media and broadcast television, social media, phone calls, texts, and in person visits, and multiple methods of communication should be employed.”).</p> <p>Phase 1 Decision, at 97-98 (“In addition, notifications must be communicated in English, Spanish, Chinese (including Cantonese, Mandarin and other Chinese languages), Tagalog and Vietnamese as well as Korean and Russian where those languages are prevalent within the utilities’ service territories.”)</p> <p>Phase 2 Decision, Findings of Fact #18, at 117 (“Coordinated responses, including messaging, among electric investor-owned utilities, first responders and emergency responders, public safety partners and state and local jurisdictions/governments is necessary to protect the public safety during a de-energization event and subsequent re-energization.”).</p> <p>Phase 2 Decision, Findings of Fact #26 (“public outreach and education in advance of wildfire season are critical components”).</p> <p>Phase 1 Decision, Conclusions of Law #26, at 127 (“The utilities, in partnership with local and state public safety partners, must develop notification strategies for AFN populations up to and including in person notification.”).</p> <p><i>See also</i> Phase 1 Decision, at 86-87 (“[t]he Commission is persuaded by parties that it is valuable to adopt a specific notification timeline”</p>	<p>Verified</p>
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<p>3. Reducing the Need for De-Energization and Conditions for PSPS</p> <p>SBUA argued that de-energization guidelines should include objective criteria so that de-energization is used as a last resort.</p> <p>D.19-05-042 requires the utilities to begin developing and making available information characteristics and thresholds that the utility uses in considering whether to de-energize.</p>	<p>Phase 1 Decision, at 68 (indicating that the utilities need to take steps to minimize the need for and frequency of de-energization events).</p> <p>SBUA Comments on OIR, at 3 (“The Commission should develop a checklist of requirements that need to be met in order for the IOUs to de-energize power lines outside of emergency situations.”).</p>	Verified
<p>4. Utility Reporting</p> <p>SBUA spent relatively lesser amounts of time in Phase 1 urging the Commission to clarify terms used in the Staff Proposal and Resolution ESRB-8, to ensure that the utilities understand their reporting duties. The Commission deferred consideration of these reporting requirements to Phase 2.</p>	<p>Final Decision, Order, Par. 1 (ESRB-8 guidelines are to remain in effect).</p> <p>Phase 1 Decision, at B1 (Phase 2 should “[c]onsider additional or refined processes for reasonableness review, communication protocols, mitigation measures and reporting requirements established in ESRB-8 and this decision”).</p> <p>SBUA comments on OIR, at 6 (the Commission should clearer guidance on the ESRB-8 reporting requirements to the SED director).</p> <p>SBUA Reply Comments on Staff Proposal, at 1 (ESRB-8 includes subjective language that provides little guidance on standards or criteria that needs to be met prior to engaging in a de-energization of power lines), at 2 (indicating that utility reports submitted to the Director of SED should be publicly available).</p>	Verified

D.20-05-051
(PHASE 2)

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>1. Improved PSPS Planning and Transparency</p> <p>SBUA provided a detailed record of the failure of utilities to appropriately report on PSPS events, transparently justify their de-energization decisions, explain the lessons learned from PSPS events, and provide actionable information to enable the public to respond to PSPS events.</p> <p>SBUA argued that the Commission must develop improved and transparent guidelines for de-energization events. SBUA’s record supports the need for added transparency as well as de-energization exercises to improve PSPS performance and for Working Groups and Advisory Boards to share best practices and lessons learned.</p>	<p>Phase 2 Decision, at 70 (“SBUA comments that data from de-energization events in 2018 and 2019 should allow some estimation of de-energization-driven risks, but such risk data does not appear to be part of the reporting”). The Commission effectively agreed with SBUA and concluded “There is support in the record for the Commission to develop guidelines regarding transparency during de-energization events that are triggered in an effort to mitigate wildfire risk.” (71)</p> <p>SBUA filed comments on four, late-2019 post-PSPS event reports (filed Jan. 7, 2020) documenting across-the-board failure to identify alternatives to de-energization, balancing of risks of PSPS against wildfire risks or identification of meaningful lessons. <i>See also</i> SBUA Comments on Ruling Requesting Comments on Proposed Additional and Modified De-Energization Guidelines, at 2, 3 (suggesting improvements to lessons learned standards).</p> <p>SBUA Opening Comments on Proposed Additional and Modified De-Energization Guidelines, at 6-7 (discussing IOU’s generally weak analysis of pre-PSPS decision-making); SBUA Reply Comments on Proposed Additional and Modified De-Energization Guidelines, at 2-3 (accord).</p>	Verified
<p>2. Communications and Transportation Resiliency</p> <p>SBUA advocated to expand the definition of critical facilities and bring transportation and communications infrastructure within the scope of the Guidelines.</p> <p>The Commission agreed with and relied on the record</p>	<p>The Phase 2 Decision (73-74; Appendix A, p.10) expanded the definition of “critical facilities” to include the transportation sector as requested by SBUA and other parties and over the objections of several IOUs.</p> <p>The Phase 2 Decision also extended IOU responsibility to transportation and communication sectors: “SBUA supports the creation of a transportation taskforce and further supports the Commission addressing communications</p>	Verified

<p>provided by SBUA and other parties to expand the definition of critical infrastructure.</p>	<p>resilience.” (51) “Interveners like SBUA provided sufficient justification that critical communication infrastructure should be included” (54).</p> <p>SBUA Comments on Assigned Commissioner’s Phase 2 Scoping Memo, at 1 (“The transportation sector is particularly important for customers who do not have access to private transportation methods and will need to rely on public transportation in order to access health facilities, food supply stores, etc.”).</p> <p>SBUA Reply Comments to Assigned Commissioner’s Phase 2 Scoping Memo extensively analyzed the comments of many parties, at 3-4 (arguing for broad definition of critical facilities); 6 (“Commission should modify the definition of “critical facilities” to include the transportation sector.”); 9-12 (accord); SBUA Reply Comments on Phase 2 Proposed Decision, at 4-5 (rebutting PG&E and SDG&E objections to responsibility for communication resilience).</p> <p>November 4, 2019, Letter Support of <i>Ex Parte</i> Request by TURN, CforAT, and NCLC for Immediate Action to Address Communication Network Failures (discussing small business reliance on communication infrastructure) (note: SBUA is not claiming compensation for the time associated with this letter in any other proceeding).</p>	
<p>3. PSPS Harm Mitigation</p> <p>SBUA provided extensive comments on methods of harm mitigation in addition to Community Resource Centers (CRCs). SBUA’s participation was beneficial to the Commission to reflect the wider needs of the small businesses, commercial and institutional customers and general public for whom CRCs are not adequate mitigation.</p> <p>The Commission recognized SBUA’s contribution and</p>	<p>SBUA was recognized as contributing to the Phase 2 Decision by recommending specific, formal requirement that IOUs consider expanding beyond isolated CRCs to develop resiliency zones around existing islanding opportunities to protect dense areas of vulnerability from PSPS events altogether (Phase 2 Decision at 37).</p> <p>SBUA made several proposals to limit the harm of de-energization: SBUA Opening Comments on Proposed Additional and Modified De-Energization Guidelines, at 5 (resiliency zones), 6 (need for specific plans to mitigate anticipated harm to small businesses); SBUA Reply Comments on Proposed Additional and Modified De-Energization Guidelines, at 2 (regarding distributed energy resources); SBUA</p>	<p>Verified</p>

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? ³	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: TURN, Cal Advocates, CforAT, CLECA, UCAN, Joint Local Governments'		Verified
d. Intervenor's claim of non-duplication: SBUA provided the unique perspective of small business, which are particularly vulnerable to economic losses from even short-term PSPS events. No other party focused exclusively on the needs and interests of small business ratepayers.		Noted

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>SBUA intervened in this proceeding to protect and advance the interests of small businesses. As noted above, SBUA actively participated throughout the process to ensure that PSPS notification procedures adequately met the needs of this customer base. SBUA participated in this proceeding by: commenting on the Order Instituting Rulemaking, participating in various Commission workshops, commenting on the staff proposal for Phase 1 guidelines, commenting on Phase 2 issues outlined in the Phase 2 Track 1 Scoping Memo, replying to party comments on the Scoping Memo, submitting an ex parte letter supporting the motion of other parties to protect telecommunication infrastructure, submitting comments on reports from PG&E's October and November 2019 PSPS events, SCE's November PSPS events and SDG&E's October PSPS events, providing opening and reply comments on proposed additional guidelines, responding to support joint motion of intervenors seeking an emergency order during the COVID-19 pandemic, and submitting opening and reply comments on the Proposed Decision. SBUA's participation significantly contributed to the Decision by adding the perspective of small business ratepayers. On numerous occasions, SBUA's participation was explicitly recognized in the Decisions. For example, SBUA's record on the importance of reliable communication infrastructure to small</p>	Noted

³ 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>businesses was cited as providing “sufficient justification that critical communication infrastructure should be included” within the scope of the Phase 2 Decision.</p> <p>SBUA’s compensation request seeks an award of \$15,866.50 for work performed on D.19-05-042 and \$30,100.00 for work performed on D.20-05-051. These are reasonable requests for fees and costs in a fast moving, highly complex proceeding with phases and in light of the advocacy SBUA engaged in on behalf of an underrepresented customer class. For these reasons, the Commission should find that SBUA’s efforts have been valuable and the request for fees reasonable.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>The hours claimed are reasonable in the context of the technical nature of this proceeding and the amount of effort needed to analyze utility filings and provide meaningful analysis. SBUA participated effectively and efficiently in work performed, both in Phase 1 and Phase 2. SBUA’s efforts resulted in multiple contributions to D.19-05-042 and D.20-05-051, as detailed above, and encompassed the preparation of fourteen filings by SBUA, formally on the docket, as well as participation in workshops and a prehearing conference.</p>	<p>Noted</p>
<p>c. Allocation of hours by issue:</p> <p>SBUA has assigned the following issue codes:</p> <p>Phase 1 (approximately 45 hours):</p> <ol style="list-style-type: none"> 1. Definitions 2. Notification and Outreach 3. Reducing the Need for De-Energization and Conditions for PSPS 4. Utility Reporting 5. General Participation <p>Phase 2 (approximately 81 hours):</p> <ol style="list-style-type: none"> 1. Improved PSPS planning and transparency 2. Communication and transportation resiliency 3. PSPS harm mitigation 4. Overarching and ongoing PSPS policy development 5. General Participation <p>SBUA asserts that the categories above are well defined to allow SBUA to accurately assign hours to various tasks in its time entries. Should the Commission wish to see different information on this point or some other breakdown of SBUA’s hourly work, SBUA requests that we be so informed and provided an opportunity to supplement this request accordingly. SBUA submits that all of the hours claimed were reasonably efficiently expended and should be fully compensated.</p>	<p>Noted</p>

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Ivan R. Jimenez	2019	49.6	\$245	D.20-06-013	\$12,152.00	49.6	\$245.00	\$12,152.00
Ivan R. Jimenez	2020	1.1	\$245	As above	\$269.50	1.1	\$250.00 [1]	\$275.00
Ariel Strauss	2019	9.9	\$375	D.20-04-023	\$3,712.50	9.9	\$375.00	\$3,712.50
Ariel Strauss	2020	26.2	\$395	As above; see Comment #1 below.	\$10,349.00	26.2	\$425.00 [2]	\$11,135.00
James Birkelund	2019	22.8	\$495	D.20-02-061	\$11,286.00	22.8	\$495.00	\$11,286.00
James Birkelund	2020	10.5	\$495	As above.	\$5,197.50	10.5	\$510.00 [3]	\$5,355.00
Paul Chernick	2019	6.5	\$400	D.20-06-015	\$2,600	6.5	\$400.00	\$2,600.00
Paul Chernick	2020	1	\$400	As above.	\$400.00	1.0	\$410.00 [4]	\$410.00
Subtotal: \$45,966.50						Subtotal: \$46,925.50		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Ivan Jimenez	2019	6.9	\$127.5	50% of 2020 Rate	\$879.75	2.4 [5]	\$122.50 [6]	\$294.00
James Birkelund	2019	1.2	\$252.5	50% of 2020 Rate	\$303.00	1.2	\$247.50[7]	\$297.00
James Birkelund	2020	8.2	\$252.5	50% of 2020 Rate	\$2,070.50	8.2	\$255.00	\$2,091.00
Ariel Strauss	2020	6.5	\$197.5	50% of 2020 Rate	\$1,283.75	6.5	\$212.50	\$1,381.25
Subtotal: \$4,537.00						Subtotal: \$4,063.25		
TOTAL REQUEST: \$50,503.50						TOTAL AWARD: \$50,988.75		

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

**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
Ivan R. Jimenez	December 2016	313644	No
Ariel S. Strauss	March 2012	282230	No
James M. Birkelund	March 2000	206328	No

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

Attachment or Comment #	Description/Comment
Comment 1	<u>2020 Rate for Attorney Ariel S. Strauss</u> Mr. Strauss' rate in D.18-07-036 was set at \$375 per hour. In addition, we are asking for a 5% step increase for Mr. Strauss, resulting in a 2020 rate in this case of \$395 per hour (375*1.05, rounded to the nearest five, per D.13-05-009). Resolutions ALJ-357 states: "It is reasonable to allow individuals an annual 'step increase' of 5%, twice within each experience level and capped at the maximum rate for that level, as authorized by D.07-01-009." Mr. Strauss who is in the 8-12 years of experience bracket has not yet received any step increases in this experience level.
Comment 2	SBUA does not seek recovery of other costs incurred by the organization, such as research, printing and mailing, further making this claim request reasonable.
Attachment 1	Certificate of Service
Attachment 2	Time Sheet Records with Allocation of Hours by Issue for D.19-05-042
Attachment 3	Time Sheet Records with Allocation of Hours by Issue for D.20-05-051

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

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1]	We have applied the 2.55% 2020 COLA to Ivan Jimenez's 2019 rate, per Res. ALJ-387, bringing the 2020 Rate to \$250.00 after rounding to the nearest \$5 per D.08-04-010.
[2]	We have applied the first 5% step increase to Ariel Strauss' 2019 rate of \$395.00, bringing the 2020 rate to \$415.00. We have also applied the 2.55% COLA, per Res. ALJ-387, bringing Ariel Strauss' 2020 rate to \$425.00 after rounding to the nearest \$5 per D.08-04-010.
[3]	We have applied the 2.55% 2020 COLA to James Birklund's 2019 rate, per Res. ALJ-387, bringing the 2020 Rate to \$510.00 after rounding to the nearest \$5 per D.08-04-010.
[4]	We have applied the 2.55% 2020 COLA to Paul Chernick's 2019 rate, per Res. ALJ-387, bringing the 2020 Rate to \$410.00, after rounding to the nearest \$5 per D.08-04-010.
[5]	Upon verification of the submitted timesheets, we found Ivan Jimenez's 2019 6.9 hours for claim preparation include 2.4 hours for NOI preparation and 4.5 hours for Claim Preparation. The Intervenor Compensation Claim was submitted after Phase 2 in 2020 and claimed for Ariel Strauss and James Birkelund, therefore we are reducing Ivan Jimenez's 2019 preparation hours to 2.4 due to duplicative work.
[6]	The requested rate contained an arithmetic error. The correct rate is \$122.50
[7]	The requested rate contained an arithmetic error. The correct rate is \$247.50.

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. Small Business Utility Advocates has made a substantial contribution to D.19-05-042 and D.20-05-051.
2. The requested hourly rates for Small Business Utility Advocates' 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 are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$50,988.75.

CONCLUSION OF LAW

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

ORDER

1. Small Business Utility Advocates shall be awarded \$50,988.75.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Liberty Utilities (CalPeco Electric), Bear Valley Electric Service, Inc., and Pacific Power, a division of PacifiCorp shall pay Small Business Utility Advocates their respective shares of the award, based on their California-jurisdictional electric revenues for the 2019 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 October 13, 2020, the 75th day after the filing of Small Business Utility Advocates' 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):	D1905042, D2005051		
Proceeding(s):	R1812005		
Author:	ALJ Stevens, ALJ Poirier, ALJ Kao, ALJ DeAngelis		
Payer(s):	Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Liberty Utilities (CalPeco Electric), Bear Valley Electric Service, Inc., and Pacific Power, a division of PacifiCorp		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
SMALL BUSINESS UTILITY ADVOCATES	Aug. 4, 2020	\$50,503.50	\$50,988.75	N/A	See CPUC Comments, Disallowances, and Adjustments

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Ivan	Jimenez	Attorney	\$245	2019	\$245.00
Ivan	Jimenez	Attorney	\$245	2020	\$250.00
Ariel	Strauss	Attorney	\$375	2019	\$375.00
Ariel	Strauss	Attorney	\$395	2020	\$425.00
James	Birkelund	Attorney	\$495	2019	\$495.00
James	Birkelund	Attorney	\$495	2020	\$510.00
Paul	Chernick	Expert	\$390	2019	\$400.00
Paul	Chernick	Expert	\$400	2020	\$410.00

(END OF APPENDIX)