Decision 21-07-022 July 15, 2021

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Consider New Approaches to Disconnections and Reconnections to Improve Energy Access and Contain Costs.	Rulemaking 18-07-005

DECISION GRANTING INTERVENOR COMPENSATION TO NATIONAL CONSUMER LAW CENTER FOR CONTRIBUTIONS TO DECISION 20-06-003

Intervenor: National Consumer Law Center	**For contribution to Decision (D.) 20-06-003**
Claimed: $97,999.90	**Awarded: $98,294.57**
Assigned Commissioner: Darcie L. Houck	**Assigned ALJ: Stephanie Wang**

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	SB 598 requires the Commission to develop rules, policies or regulations with a goal of reducing the statewide disconnection rate of gas and electric customers by January 1, 2024. R.18-07-005 was instituted with a goal of developing a comprehensive set of policies and rules to reduce the statewide level of gas and electric service disconnections for nonpayment by residential customers. D.20-06-003 adopts rules and other changes applicable to Southern California Edison Company, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Gas Company and is designed to reduce the number of residential customer disconnections and to improve reconnection processes for disconnected customers. This decision also makes permanent, with modifications, D.18-12-013, the Interim Rules Decision which imposed a cap on disconnections based upon 2017 recorded levels per utility; extended the

	extreme weather conditions look-ahead from 24 to 72 hours; and expanded the definition of vulnerable customers to include any household on medical baseline or life support and for customers age 65+ as defined in D.16-09-016 for senior citizens. D.20-06-003 adopts and makes permanent, with modifications the Interim Rules Decision issued on December 13, 2018. This decision also provides for additional protections by requiring the large investor owned utilities (IOUs) to enroll eligible customers in all applicable benefit programs administered by the IOUs, requiring the IOUs to offer payment plans of 12-month periods, and prohibiting disconnections if there is a Low Income Home Energy Assistance Program (LIHEAP) pledge. This decision prohibits the IOUs from requiring an establishment of service deposit or reestablishment of service deposit, as deposits can adversely impact a household's ability to meet its financial obligations. Additionally, utilities are precluded from charging customers reconnection fees. This decision also requires the IOUs to improve their disconnection notices so that customers are better informed that they are in danger of having their utilities disconnected and are provided information concerning the availability of financial programs which may be available to assist them. This decision also establishes new procedures that the large utilities will use when determining whether a customer has benefited from prior service at a residential location. It also makes various improvements in the way that the IOUs interact with Low Income Home Energy Assistance Program providers. This decision also revises the medical baseline program so that physician's assistants and nurse practitioners can certify eligibility for medical baseline enrollment. Additionally, the decision promotes greater transparency with the

	community choice aggregation providers. This decision requires that the issue concerning additional outreach for California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA) be addressed in the consolidated Applications referred to collectively as Application 19-11-003. It also encourages gas field collectors to have the capability to accept payments in the field from residential customers who are facing immediate disconnections. To assist CARE and FERA customers with large unpaid arrearages, it creates an Arrearage Management Payment (AMP) plan. To evaluate ways of making monthly utility bills manageable, this decision creates a separate ratesetting phase of this proceeding to evaluate the percentage of income payment plan (PIPP) which was originally set forth in the proposed decision. Finally, this decision mandates the creation of an enforcement program to ensure that the IOUs are complying with the requirements of this decision.

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:	8/15/2018	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	9/13/2018	Verified
4. Was the NOI timely filed?		Yes
Showing of eligible customer status (§ 1802(b) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	R.18-07-005	Verified
6. Date of ALJ ruling:	5/21/2019	Verified

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

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:	R.18-07-005	Verified
10. Date of ALJ ruling:	5/21/2019	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.20-06-003	Verified
14. Date of issuance of Final Order or Decision:	6/16/2020	Verified
15. File date of compensation request:	8/14/2020	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
1. Low-Income Specific Consumer Protections, including approaches in other states **<u>1.a. Disconnection Rate Cap Goal</u>:** NCLC, while supportive of an interim disconnection rate cap, raised concerns about the risk in increased arrearages for struggling households. We	**<u>1. a Disconnection Rate Cap Goal:</u>**D.18-12-2013 ("Interim Decision") cites NCLC's contribution in the setting of a disconnection rate cap goal. In particular, NCLC's concern for increased arrearages and the need for guidance to target relief to customers	Verified

noted the risks of a hard disconnections cap and instead recommended maintaining some flexibility to target relief to vulnerable households while maintaining an eye on growth in arrearages. See 9/18/18 CforAT/NCLC Comments at 3-4 (hard cap limits flexibility to target relief to those most in need); 11/19/18 CforAT/NCLC Comments at 3-4 (support for disconnection cap); 7/1/19 CforAT/NCLC Reply Comments at 1-3 (support disconnections rate cap goals/targets and oppose PG&E and SCE's proposals to delay setting the rate cap goals/targets until there is a root cause analysis). **Zip Codes w/ High Disconnection Rates** NCLC and CforAT also raised concern over the high disconnection rates in certain zip codes and recommended prioritizing these high risk areas for disconnection protection. See 6/14/19 NCLC/CforAT Comments at 4-5	most in need (Interim Decision at 13) and our support for an absolute cap (Interim Decision at 14). "We adopt a goal, rather than a hard cap, for the large IOUs due to concerns expressed in comments about the unintended consequences of a hard cap. These consequences include higher arrearages for those who avoid disconnection as a result of a cap . . . . As this decision offers the large IOUs more flexibility by establishing a goal rather than a hard cap, we direct the large IOUs to use that flexibility to manage disconnections in a way that limits the number of customers experiencing disconnections while also minimizing the growth if arrearages." (Interim Decision at 16). See Interim Decision Conclusions of Law (COL) #4 (re Disconnection Goal); Interim Decision Order#1 (a)(re Disconnection Goal) **Zip Codes w/ High Disconnection Rates** D.20-06-003 ("Phase 1 Decision") discusses NCLC and CforAT's concern over the disparities in disconnections in some zip codes in the rational for limiting the disconnection rate in any zip code to 30%.(Phase 1 Decision at 35-36)	Verified
1.b. Vulnerable Customer protections/payment plans: The Commission began this proceeding by exploring enhanced disconnection protections for certain vulnerable populations. In the discussions leading up to the Interim Decision, the focus was on protections for older residents (above 65 years) and	**1.b. Vulnerable Customer protections/payment plans:** The Interim Decision targets disconnection protections at seniors over 65 years of age and Medical Baseline customers. "For purposes of interim rules . . . . utilities shall not disconnect	Verified

medical baseline/seriously ill residents. NCLC provided examples of other states' protections for vulnerable residents and also recommended increased notice, outreach and education regarding assistance programs and disconnection protections and recommended stronger, uniform payment plan rules. See 8/9/18 CforAT/NCLC Comments at 6 (provided resources regarding disconnection protections for seriously ill, consumers with disabilities, seniors, winter moratoria/temperature-based protections, state summaries of protections); 9/18/18 CforAT/NCLC Comments at 6-7 (disconnection protections for seniors and examples from other states); 11/19/18 CforAT/NCLC Comments at 4-6 (payment plans of 4 months) and 11/26/18 CforAT/NCLC Reply Comments at 3 (regarding IOU obligation to discuss protections in customer contacts before disconnection). **Phase 1** By the Phase 1 Decision, there was a shift from targeting certain vulnerable populations towards blanket uniform availability of strong payment plan rules and enhanced notice, outreach and education about payment assistance programs and disconnection protections.	customers for nonpayment who qualify for medical baseline and/or above 65 years old, as long as the customer agrees to a payment plan offered by the utility . . . . but the utility must offer a payment plan of at least four months' duration to any vulnerable customer at risk of disconnection_. . . . However, we encourage IOUs to try and work with the customer to ensure that adequate opportunities are provided for a customer 65 or over to resolve any payment delinquencies. For example, IOUs are encouraged to offer vulnerable customers payment plans that exceed the four-month minimum established in this decision." (3.2.1 Discussion, Interim Decision at 21 – 22). See Interim Decision COL # 7 (reasonable to require that utilities offer vulnerable customers a payment plan of at least 4 months); Interim Decision Order #1(b)(re disconnection protection for residents over 65 or on Medical Baseline and utilities must offer payment plans of at least 4 months; if utility has a discussion with a customer prior to disconnection, the utility has a duty to inquire if any resident is 65 or older). **Phase 1** In D.20-06-003 (Phase 1 Decision), the Commission notes that consumer advocacy groups supported disconnection protections for seniors, but shifted focus on protection of specific vulnerable customers to a blanket requirement of the utility to offer a 12-month payment plan to payment-challenged customers	Verified

<u>Enrollment in utility assistance programs</u> In NCLC's recommendations for permanent protections for vulnerable customers, we supported disconnection protections upon enrollment in all applicable utility assistance programs, and proposed that disconnection protections cover the period when customers are applying for such programs. See 12/6/19 CforAT/NCLC Comments at 12 –14 and 12/13/19 CforAT/NCLC Reply Comments at 10.	(Phase 1 Decision at 14). The Phase 1 Decision notes NCLC's comments regarding disconnection protections contingent upon successful enrollment in all applicable utility assistance programs and NCLC's recommendation regarding 12-month payment plans. (Phase 1 Decision at 23-25) **<u>Enrollment in utility assistance programs</u>** The Phase 1 Decision acknowledges the importance of increasing participation in the applicable assistance programs as reflected in the COL #9 ("it is reasonable to impose restrictions prohibiting disconnections of residential utility service until the utility has offered to enroll the residential customer all applicable benefit programs administered by the utility") and Order #1(c) ("residential customers shall not be disconnected for nonpayment until the utility offers to enroll eligible customers in all applicable benefit programs administered by the utility. The utility is not required to make affirmative inquiry of every residential household as to whether they are enrolled in all applicable benefit programs. If the utility has discussions with a residential customer prior to disconnection, however, that utility shall have a duty to inquire if the customer is interested in hearing about the applicable benefit programs. Residential customers must enroll in the applicable benefit program within two billing cycles of being made aware of the applicable benefit programs.")	Verified

Strong uniform payment plan rules in the Interim Decision NCLC recommended strong uniform rules regarding payment plans, particularly due to the variation in the access to payment plans and terms, the lack of transparency and difficulty securing payment plans expressed by customers and community based organizations. See 11/19/18 CforAT/NCLC Comments at 5-6 (utilities should not simply offer any payment plan, but rather payment plans must be at least 4 months for all vulnerable customers); 11/26/18 CforAT/NCLC Reply Comments at 1-3 (desperate customers will agree to unreasonable payment plan offers, so should require at least 4 month payment plans).	See also Phase 1 Decision Conclusion of Law #10 ("it is reasonable to impose restrictions prohibiting disconnections of residential customers if a LIHEAP pledge is pending.") and Order #1(e) ("Residential customers shall not be disconnected if they currently have a Low-Income Home Energy Assistance Program pledge pending.") **Strong uniform payment plan rules in the Interim Decision** The Interim Decision cites NCLC's contribution regarding specific guidelines for vulnerable customer payment plans. "CforAT and NCLC are concerned that customers will accept whatever payment plan is offered to them, even if they cannot afford the payment plan provided, in order to avoid disconnection in the near term. CforAT and NCLC propose that utilities be required to offer vulnerable customers payment plans spread over at least four months." (3.2 Interim Decision at 21). See Interim Decision COL #7 ("It is reasonable to require that utilities offer vulnerable customers a payment plan of at least four months' duration."); Interim Decision Order #1(b) ("The Respondent Utility must offer a payment plan of at least four month's duration to the customer; the customer is free to select a shorter payment plan period, but must be offered a payment plan of at least four months' duration by Respondent Utility. . . .If the Respondent Utility has discussions with a residential	Verified
Phase 1 Decision NCLC repeatedly recommended permanent uniform payment plan rules in comments leading to D.20-06-		Verified

003 (Phase 1 Decision). See 6/14/19 NCLC/CforAT Comments at 6, 19-20 (recommend standardized payment plan rules); 7/1/19 CforAT/NCLC Reply Comments at 2 (Raised concerns about difficulty obtaining a reasonable payment plan or even a payment plan); 7/10/19 CforAT/NCLC Comments at 2-3 (Raised need for uniform, strong payment plan rules); 6/1/20 NCLC Reply Comments at 4 (Strong support for 12-month payment plans. Record reflects consumer frustration with lack of transparency and difficulty in securing reasonable payment plans and PD addresses that concern by providing equitable access to all payment-troubled customers of large IOUs).	customer prior to disconnection, however, that Utility shall have a duty to inquire if anyone in that household meets the 65+ parameters for senior citizens adopted herein.") **Phase 1 Decision** The Phase 1 Decision was responsive to the recommendation for uniform, strong payment plan rules. See OL #11 ("it is reasonable to impose restrictions prohibiting disconnections of residential customers until they have been offered a payment plan of at least 12-months.") and Order #1(d)("Prior to disconnecting any residential customer, the utility shall offer the residential customer a 12-month payment plan. The utility shall not disconnect any residential customer who is on a12-month payment plan and is current on both monthly bills and the 12-month payment plan.") The Phase 1 Decision also explicitly extends the 12-month payment plan protection to medical baseline customers. See Order #1(b)("Residential customers shall not be disconnected for nonpayment if they qualify for medical baseline and the customer agrees to a 12-month payment plan.")	
1.c. Temperature-Based Protections: NCLC provided resources on other states' weather related disconnection protections. See 8/9/18 CforAT/NCLC	**1.c. Extreme Temperature-Based Protections** The Interim Decision cites NCLC's contribution regarding research on other states' extreme temperature disconnection protections and	Verified

Comments at 6 and 9/18/2018 CforAT/NCLC Comments at 7-9. NCLC recommended strong temperature-based disconnection protections in this proceeding. See 11/19/18 CforAT/NCLC Comments at 2-3 (support for temperature-based protection); 11/26/18 CforAT/NCLC Reply Comments at 4 (oppose PacifiCorps proposal that weakened the temperature-based protection proposal).	NCLC's support of strong temperature-based protections (3.3 Interim Decision at 25). See Interim Decision's Conclusions of Law #8 ("It is reasonable to prohibit the energy utilities covered by the interim rules adopted in this decision from disconnecting residential electricity customers when temperatures above 100 degrees or below 32 degrees are expected based on a 72-hour look-ahead period."); Interim Decision's Conclusions of Law #9 ("It is reasonable to prohibit gas utilities covered by the interim rules adopted in this decision from disconnecting gas service when the temperature falls below 32-degrees on a 72-hour look-ahead period."); Interim Decision Order #1(c) ("Residential customer shall not be disconnected when temperatures above 100 degrees or below 32 degrees are forecasted based on a 72-hour look-ahead period.") The Phase 1 Decision adopted the uniform temperature-based disconnection protections from the Interim Decision. See Phase 1 Decision, COL #7 and #8 (reasonable to prohibit disconnections when temperatures are above 100 degrees or below 32 degrees) and Order #1(f) (adopts the Interim Decision temperature-based disconnection protection).	
1.d Subsidized Housing Tenant Disconnection Protections The Proposed Phase I Decision included vulnerable customer protection for tenants of subsidized housing.	**1.d Subsidized Housing Tenant Disconnection Protections** The Phase 1 Decision notes NCLC's support for enhanced protections for subsidized tenants. See Phase 1 Decision discussion at 17-18. Ultimately, the Commission opted to	Verified

NCLC was very supportive of this protection as loss of utility service provided grounds for eviction for these tenants. See 12/6/19 CforAT/NCLC Comments at 10-12 (heightened risk of harm from disconnection for tenants of subsidized housing); 12/13/19 CforAT/NCLC Reply Comments at 5, 9-10 (risk of eviction, a dramatic repercussions of disconnection, and broad support for enhanced disconnection protections for subsidized tenants).	protect tenants of subsidized housing through the uniform 12-month payment plan for payment-troubled customers. See Phase 1 Decision at 20-21.	
1.e Elimination of Establishment and Reestablishment Deposits NCLC discussed how deposits pose a barrier to service for struggling households and discussed the large percentage of the population that cannot absorb a sudden expense or loss of income. NCLC recommended that the elimination of deposits reduces a barrier to affordable utility service. See 6/14/19 NCLC/CforAT Comments at 21-25; 7/1/19 CforAT/NCLC Reply Comments at 3-4 (supports elimination of reestablishment deposits to help low-income consumers); 7/10/19 CforAT/NCLC at 9 (prohibit reestablishment deposits); 5/26/20 CforAT/NCLC at 8-9 (record supports elimination of deposits for initiation and	**1.e Elimination of Establishment and Reestablishment Deposits** The Phase 1 Decision notes NCLC's comments that deposits create a hurdle for low-income customers, the financial fragility of a substantial number of households to weather a sudden expense or loss of income, and provisions of other state examples. Also notes that Cal CCA agrees with NCLC that deposits make it difficult for customers to retain service. See Phase 1 Decision at 38, 42-43. See also, Phase 1 Decision Finding of Fact (FOF) #6 ("Both Massachusetts and New York prohibit deposits for utility customers as a matter of law"), FOF #7 ("Deposits and reestablishment deposits can create financial hurdles for residential customers"), FOF #8 ("The Commission should take action to	Verified

reestablishment of service); 6/1/20 NCLC Reply Comments at 3 (challenges SoCalGas and SDG&E's opposition to the elimination of deposits; deposits pose a barrier to service and removal improves access to energy).	reduce the financial burdens caused by deposits"), Order #8 (prohibits large energy IOUs from requiring establishment deposits) and Order #9 (prohibits large energy IOUs from requiring reestablishment deposits).	
1.f. Elimination of Reconnection Fees NCLC supports the elimination of reconnection fees because the actual cost to reconnect electric customers is negligible with smart meters and agrees with TURN that there is huge variation in the reconnection charges, raising concerns that the fee is not based on actual costs. See 6/14/19 CforAT/NCLC Comments at 28 and 7/1/19 CforAT/NCLC Reply Comments at 4.	**1.f. Elimination of Reconnection Fees** The Phase 1 Decision notes NCLC's comments in support of the elimination of reconnection fees, especially because with smart meters the cost to reconnect is so low and raises this point in the discussion of the elimination of reconnection fees. See Phase 1 Decision at 49 and 51. See also, Phase 1 Decision FOF# 12 ("Reconnection fees create additional hurdles for customers trying to reestablish their utility services.") and Order#16 (Prohibits reconnection fees for the large energy IOUs).	Verified
2. Innovative Approaches to reductions in Disconnections and Reconnections, including Arrearage Management Plans (AMPs) and Percentage of Income Payment Plans (PIPPs). **<u>2.a. AMPs</u>** Since the start of this proceeding, NCLC has been recommending that the	**<u>2.a. AMPs</u>** The Commission built a strong record in its examination of an AMP (e.g., AMPs were covered in the workshop and parties were asked to	Verified

Commission consider Arrearage Management Programs (AMPs) as a best practice and innovative approach to helping customers struggling with large arrearages. See 8/9/18 CforAT/NCLC Comments at 4-5 (describing AMPs and providing resources on AMPs). NCLC has recommended that the Commission include an examination of how arrearages are treated by the utilities and recommending consideration of AMPs). See 8/24/18 CforAT/NCLC Reply Comments at 2. NCLC has provided detailed examples of AMPs in other states and factors to consider designing an AMP (e.g., treatment of bill assistance like LIHEAP; eligibility criteria; missed payments; number of times a customer can participate in an AMP, outreach and education about AMP; evaluation and monitoring; structure of an AMP – duration of a plan, amount forgiven each month). See 6/14/19 NCLC/CforAT Comments at 29-37. NCLC has presented at two workshops on AMPs. We note that Question 7.F in the ALJ Ruling Requesting Responses to Questions (5/1/19) at 37 cites Charlie Harak's AMP presentation at the 12/6/18 Workshop in Salinas. Olivia Wein also presented at the Hayward Workshop on AMPs	comment on AMPs through ALJ Rulings for additional comment in 5/1/19, 10/14/19 and 11/14/19). The Phase 1 Decision notes NCLC's contributions to the development of the AMP proposal and NCLC's extensive comments on AMPs in the record. See Phase 1 Decision at 90 (6/14/19 comments), 90-91 (Cal CCA's support of NCLC's AMP design), 93 (11/4/19), 98-99 (12/6/19 comments), 102 (12/13/19 reply comments), 107 (5/26/20 comments). The Phase 1 Decision's discussion of the AMP program design highlights detailed consideration of the aspects of AMP design that NCLC has raised in this proceeding, including: • setting the qualifications for AMP at a level that targets customers with large arrearages of a certain age (e.g., over $500 and at least 90 days old); • building outreach and education and opportunities to enroll in the AMP program design; • treatment of missed payments; • establishing the standard duration of an AMP plan (12 on-time payments of the current bill result in forgiveness of the full arrearage with 1/12 of the arrearage forgiven with each on-time payment); • for customers that fall off an AMP the amount of the forgiven arrearages is not affected; and, • extensive reporting on AMP metrics. See Phase 1 decision at 94-97. The AMP program design also applies LIHEAP to monthly bills, not the arrearage and allows customers to	

on 7/23/19 regarding aspects of AMP program design covered in NCLC's comments. Parties in this proceeding have been supportive of the concept of AMPs. See CforAT/NCLC Reply Comments at 1-2 (broad support for AMPs and critique of SCE's AMP design proposal). NCLC strongly supported the Commission's AMP design proposal (e.g., the eligibility criteria was reasonably designed to target households with large arrears; the program built in numerous opportunities for eligible consumers to learn about AMPs and enroll; the AMP program design was a good duration, so that 100% of the arrearage could be forgiven with 12 on-time payments of the current bill; the program allowed for up to 2 non-consecutive missed payments; LIHEAP support is to be directed at the current bill to help ensure affordability and program success; the proposal had good reporting metrics). See 12/6/19 CforAT/NCLC Comments at 14-16. NCLC critiqued utility proposals for highly constrained AMP pilots. See 12/13/19 CforAT/NCLC Reply Comments at 6.	enroll in a subsequent AMP after 12 months from completion of an AMP or from dropping out of an AMP. The AMP forgives a maximum of $8000 in arrears per customer. Additional refinements in AMP eligibility include, customers must have at least 1 on-time payment and must be a customer for at least 6 months, and gas only customers are eligible for an AMP if they have an arrearage of at least $250. The Phase 1 AMP program design limits eligibility to CARE/FERA customers, but Phase II can reexamine the eligibility criteria. See Phase 1 Decision at 103-109. See also Phase 1 Decision FOF # 18 ("The establishment of AMP will be a valuable tool in assisting CARE/FERA customers to eliminate unmanageable arrears and incentivize timely payments"); COL # 19 ("To promote the goals of this proceeding, it's reasonable to adopt rules establishing AMPs which will be made available to all CARE/FERA customers"); and Order # 52 - #88 (establishing AMPs for the four large energy IOUs).	

NCLC continued to strongly support the adoption of AMPs and disagreed with TURN's concern regarding free ridership and eligibility modifications that would risk increased accrual of arrearages and disconnection. See 12/13/19 CforAT/NCLC Reply Comments at 10-11; 5/26/20 CforAT/NCLC Comments at 6; 6/1/20 NCLC Reply at 2.		
2.b. PIPPs Since the start of this proceeding, NCLC has been recommending that the Commission consider Percentage of Income Payment Plans (PIPPs) as a best practice and innovative approach to helping customers struggling with large arrearages. See 8/9/18 CforAT/NCLC Comments at 6 (describes PIPPs and provides resources). NCLC described PIPPs as a helpful program to keep very low-income customers connected to utility service by making energy bills affordable. Low-income households must direct a larger percentage of income towards energy bills and a PIPP makes bills more affordable because it ties the bill amount to the household's income. NCLC supports the development of a PIPP	**2.b. PIPPs** The Phase 1 Decision notes NCLC's Comments on the value of a PIPP and NCLC's support for the development of a PIPP pilot. See Phase 1 Decision at 126. See also Phase 1 Decision FOF # 19 ("Additional work needs to be done to evaluate and implement the PIPP in a separate ratesetting phase of this proceeding"); COL # 20 ("To promote the goals of this proceeding, it is reasonable to create a separate phase in this proceeding to discuss establishing PIPPs"); and Order #90 ("There shall be a separate phase established in this proceeding which will be classified as ratesetting and will evaluate implementing the percentage of income payment plan").	Verified

through the use of a stakeholder process. See 6/14/19 NCLC/CforAT Comments at 39-40. NCLC also supports the development of a PIPP pilot. See 12/13/19 CforAT/NCLC Reply at 6-7 and 5/26/20 CforAT/NCLC Comments at 7-8.		
3. <u>Consumer Notice, Outreach and Education, Utility Obligation to Identify Customers Eligible for Protection</u> NCLC has supported additional notice, outreach and education for vulnerable consumers and has provided other state examples of special disconnection protections for older customers. This additional outreach includes the utility's obligation to identify customers' eligible for disconnection protections and a larger role for Community-Based Organizations to help with outreach/education and customer assistance. See 9/18/2018 CforAT/NCLC Comments at 4 (include information on Medical Baseline on notices and outreach in advance of disconnection); 11/19/18 CforAT/NCLC Comments at 4-5 (utility should ask if customer is eligible for medical baseline or over 65 in communications before disconnection); 11/26/18 CforAT/NCLC Reply Comments on Proposed	**3. <u>Consumer Notice, Outreach and Education, Utility Obligation to Identify Customers Eligible for Protection</u>** The Interim Decision included the utility obligation to identify customers eligible for disconnection protection. See Interim Decision Order #1(b) ("The Respondent Utility is not required to make affirmative inquiry of every residential household as to whether eligible vulnerable customers reside there. If the Respondent Utility has discussions with a residential customer prior to disconnection, however, that Utility shall have a duty to inquire if anyone in that household meets the age 65+ parameters for senior citizens adopted herein.") Phase 1 Decision includes an affirmative duty of the utility, if it is communicating with a customer, to inquire whether the customer is interested in additional information or applying for a benefits program run by the utility. Customers will have two billing cycles to enroll. See Phase 1 Decision at 27.	Verified

Interim Decision at pp.3-4 (defends duty of utility to ask if customer is 65 or older before disconnection). NCLC and CforAT have commented on the need for better communications about the consumer protections and assistance programs from the utilities. See e.g., 7/1/19 CforAT/NCLC Reply Comments at 5-6 (need for regular consumer education regarding consumer protections); 7/10/19 CforAT/NCLC comments at 7 (CBOs provide an important means of reaching vulnerable consumers and the Commission should formalize the role of CBOs in outreach and customer assistance along with compensation).	The Phase 1 Decision also includes eligibility of Community Based Organizations for capitation programs regarding outreach, education and assistance enrolling in CARE/FERA. Phase 1 Decision at 84. See also Order #47 (CBOs are able to register as capitation agencies to conduct outreach and assist with enrollment into all applicable benefits programs). The Phase 1 Decision also includes the requirement for the large energy IOUs to file Tier 3 Advice letters regarding outreach for the medical baseline program and funding Community Based Organizations to conduct outreach on the Medical Baseline program. See Order #41. See also Phase 1 Decision FOF #16 ("Additional outreach on the CARE/FERA programs is needed"); COL #17 ("To promote the goals of this proceeding, it is reasonable to have the Commission consider additional CARE andFERA outreach in A.19-11-003").	
4. Data Reporting: The Interim Decision cites NCLC's recommendation that utilities report streamlined arrearage and disconnection	4. **Data Reporting:** "We conclude that it is acceptable for the large investor-owned utilities [fn omitted] to report on arrearages and disconnections on a monthly basis as suggested by CforAT, NCLC and the	Verified

data on a monthly basis (rather than the current quarterly reporting) due to a concern that in R.10-02-005, arrearages increased following a limitation of residential disconnections for non-payment (Interim Decision at 10). See also, 8/9/2018 CforAT/NCLC Comments on OIR at 7 (recommends extension of utility reporting of disconnection *etc*. data); 8/24/18 CforAT/NCLC Comments on OIR at 2 (extension re data reporting); 9/18/18 CforAT/NCLC Comments on Ruling and Request for Comments on Proposed Pilots at 3 (recommend monthly reporting to keep pulse on arrearages); 11/19/18 CforAT/NCLC Comments on Interim PD at 2 (support for monthly reporting).	Public Advocates Office." (Interim Decision at 10) "Establishing reporting requirements for the large IOUs if they exceed the [disconnection] goal, in addition to the reporting requirements in section 2.4.1, will hold the large IOUs accountable as they manage their disconnection rates. The reporting requirement will remain in effect for as long as the disconnection goal remains in effect." (Interim Decision at 17) See Interim Decision Order #6 ("All respondents are directed to file monthly reports of specific disconnection data as specified in Appendix B, or in a form otherwise approved by the Energy Division").	
5. Additional Contributions **<u>5.a Establishment of Benefit of Service Procedures</u>** Customers and Community Based Organizations raised the problem of the lack of transparency, inconsistent processes and lack of a process for challenging the assignment of liability for old arrearages to non-customers of record. NCLC recommended that the Commission tackle this barrier to service and supported improvements to	**<u>5.a. Establishment of Benefit of Service Procedures</u>** The Phase 1 Decision notes NCLC's support for the uniform Benefit of Service procedure and the unfortunate IOU response to the concerns about the current process for assigning liability for old arrearages to non-customers of record. See Phase 1 Decision at 57. See also Phase 1 Decision FOF#13 ("Requiring a new tenant to pay the previous tenant's utility bills presents	Verified

the process that provides uniform procedures for benefit of service situations. See 7/1/19 NCLC/CforAT Comments at 2; 7/10/19 CforAT/NCLC Comments at 9; 12/6/19 CforAT/NCLC Comments at 1-4; 12/13/19 CforAT/NCLC Reply Comments at 2-3 (pointing out the nexus between the Benefit of Service liability and risk of disconnection from unaffordable payment plans); 6/1/20 NCLC Reply Comments at 3-4 (objects to SCE's proposal for gathering sensitive information as part of the Benefit of Service process).	additional financial burdens to customers who may be struggling financially."); Phase 1 Decision COL #13 ("To further the goal of limiting disconnections, it is reasonable to adopt rules relating to how the IOUs evaluate and determine benefit of service"); Phase 1 Decision Order #18 - #23 (new uniform procedure for Benefit of Service for the large energy IOUs).	
5.b. Coordination with LIHEAP/ Online LIHEAP pledge portal LIHEAP is an important energy bill assistance program and development of an online LIHEAP pledge portal will improve the efficiency of the processing of the LIHEAP benefit. This improvement will benefit low-income LIHEAP recipients. NCLC was in strong support for the development of an online LIHEAP pledge portal. See 12/6/19 CforAT/NCLC Comments at 4-7 and 12/13/19 CforAT/NCLC Reply Comments at 4, 7-9 (the record sets out the harmful consequences of the existing cumbersome LIHEAP pledge process and the support for an online	**5.b. Coordination with LIHEAP/Online LIHEAP pledge portal** The Phase 1 Decision notes NCLC's support for the development of an online LIHEAP pledge portal and party support for an online porta. See Phase 1 Decision at 69, 74. See also Phase 1 Decision FOF# 14 ("LIHEAP is an important program that can assist low-income households with energy expenses"); Phase 1 Decision COL #14 ("To further the goal of limiting disconnections, it is reasonable to adopt rules relating to how the IOUs interact with LIHEAP providers"); Phase 1 Order #27 - #30 (re the development of online LIHEAP pledge portals).	Verified

portal); 5/26/20 CforAT/NCLC at 6 (support for the online pledge portal).		
5.c. Enhanced serious illness/Medical Baseline protections NCLC recommended expanding the medical health professionals that can certify the medically fragile status of customers to enhance the serious illness/Medical Baseline protections. NCLC provided examples of other states' rules regarding a more expansive list of who can certify the medical condition of a patient. See 6/14/19 CforAT/NCLC Comments at 11-12. This research formed the basis of the recommendation made by at the Hayward workshop to broaden the entities that can certify customers for the Medical Baseline.	**5.c. Enhanced serious illness/Medical Baseline protections** The Phase 1 Decision discusses the enhancement to the Medical Baseline by expanding the medical professionals that can certify customer eligibility for this program to include physician assistants and nurse practitioners. See Phase 1 Decision at 76. See also Phase 1 Decision FOF #20 (SB1338 authorizes a physician's assistant to certify customers for Medical Baseline); Phase 1 Decision Order #34, #35 (Authorizes physician assistants to certify customers for Medical Baseline and authorizes qualified medical professionals to e-sign applications for the medical baseline program.)	Verified
5.e. Citation Program NCLC supported the establishment of a citation program. See 12/6/19 CforAT/NCLC Comments at 8-9; 12/13/19 CforAT/NCLC Reply Comments at 5, 9; 5/26/20 CforAT/NCLC Comments at 9-10.	**5.e. Citation Program** Phase 1 Decision notes NCLC's support for the citation program. See Phase 1 at 136; Phase 1 COL #21 ("To promote the goals of this proceeding it is reasonable to adopt rules establishing an enforcement mechanism designed to ensure that the IOUs follow the rules and requirements of this decision"); Phase 1 Order #93 and #94 (The Commission's Enforcement Branch shall establish an enforcement program and the program shall be	Verified

	enacted through the Commission's Resolution Process).	

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: Center for Accessible Technology (CforAT), The Utility Reform Network (TURN), UCAN, CLICC		Verified
d. Intervenor's claim of non-duplication: NCLC coordinated very closely with CforAT through this proceeding and filed comments jointly by developing consensus positions in our comments. NCLC shared resources regarding Arrearage Management Programs with TURN and UCAN and other parties early on in the proceeding. We coordinated with TURN prior to workshops by sharing presentations ahead of time. NCLC and CforAT's positions overlapped with the other public interest organizations at a higher conceptual level, but differences emerged with finer details. For example we disagreed with TURN regarding the finer details of AMP program design. NCLC focused on different aspects of issues, such as the need for more frequent reporting of arrearages data with the imposition of a disconnections cap goal. NCLC also focused on providing examples of disconnection protections and programs from other states.		Verified. We note NCLC and CforAT's positions overlapped. But their analysis was conceptually different and materially supplement and complement each other's work.

PART III: REASONABLENESS OF REQUESTED COMPENSATION

[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.

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

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: The impact of the Interim Decision and Phase 1 Decision on struggling, economically fragile customers, particularly during this COVID-19 pandemic, is profound. The preservation of essential energy service is critical for the protection of health and safety and human life during this COVID-19 crisis. Even before the COVID-19 crisis, access to energy service had health and safety ramifications during extreme temperatures. Loss of service affects the habitability of a home, and, for subsidized tenants, can lead to eviction. The protections established in the Interim Decision and Phase I decision includes measures to ensure eligible low-income consumers learn about and have increased opportunities to enroll in affordability programs, have transparent rules regarding protective 12-month payment plans and a uniform and fair process for treatment of Benefit of Service situations. The Phase 1 Decision reduces the risk of disconnection by eliminating deposits and fees that pose barriers to service and by adopting innovative programs to help customers with large arrears achieve a fresh start. The Phase 1 Decision also improves low-income consumer access to LIHEAP assistance by improving the coordination of the administration of LIHEAP between the LIHEAP grantee and the utilities. This decision also enhances the medical baseline program protections and includes community based organizations in the outreach, education and customer assistance to improve consumer awareness and adoption of the protections and programs. The Phase 1 decision also includes the creation of a citation program to ensure that these important protections are implemented properly. In short, these protections secured in the Interim Decision and Phase 1 Decision are among the most protective in the country. It is hard, if not impossible to assign a dollar value to the benefits to the health, safety and economic well-being of Californians and their communities. In light of the grave importance of the issues discussed above and the benefits to low-income consumers, in particular, NCLC's request of intervenor compensation is reasonable.	The Commissions finds the claimed costs reasonable.
b. Reasonableness of hours claimed: NCLC worked efficiently and effectively in this proceeding. We coordinately closely with CforAT in the development of policy positions and divided drafting responsibilities for our comments. CforAT handled	The Commission finds the hours claimed reasonable.

the vast majority of the filings and service for our joint comments. NCLC and CforAT also split coverage of the 6 workshops, except the ones where we were both presenting. NCLC has not billed for all our time on this proceeding (e.g., where both attorneys were on the same call). We also substantially reduced the hours charged in the fee claim. As reflected in the discussion above regarding substantial contribution, NCLC's efforts in this proceeding have resulted in numerous contributions thus far that have influenced the Interim Decision and Phase 1 Decision.

NCLC limited travel to workshops and, where possible, saved on costs by staying with friends and family. Most of the work for NCLC was performed by Olivia Wein with efforts to minimize work performed by senior attorney, Charles Harak to save on cost.

We also note the expansive range of issues covered in this proceeding and that this request covers two decisions over the span of two years.

c. Allocation of hours by issue:

The Commission finds the allocation of hours reasonable.

2018 Time for Charles Harak		
Code	**Hours**	**Percent**
CP	9.65	42.3%
AMP/PIPP	9.65	42.3%
Misc.		
####	.50	2.2%
GP	3.00	13.2%
Total	*22.80*	*100%*

2019 Time for Charles Harak		
Code	**Hours**	**Percent**
CP	.10	7.14%
AMP/PIPP	.10	7.14%
Misc.		
####	1.20	85.71%
GP		
Total	*1.40*	*100%*

2018 Time for Olivia Wein		
Code	**Hours**	**Percent**
CP	19.15	39.9%
AMP/PIPP	3.70	7.7%
Misc.	1.4	2.9%
####	8.25	17.2%
GP	15.50	32.3%
Total	*48.00*	*100%*

2019 Time for Olivia Wein		
Code	**Hours**	**Percent**
CP	33.25	33.6%
AMP/PIPP	27.40	27.7%
Misc.	5.85	5.9%
####	26.75	27.0%
GP	5.75	5.8%
Total	*99.00*	*100%*

2020 Time for Olivia Wein		
Code	**Hours**	**Percent**
CP	14.05	41.6%
AMP/PIPP	4.65	13.8%
Misc.	3.8	11.3%
####	11.25	33.3%
GP		
Total	*33.75*	*100%*

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Olivia Wein	2018	48	$379	D.07-01-009; D.08-04-010; ALJ-329; ALJ-345; ALJ-352 See Attachment 3.	$18,192.00	48	$380.00[1]	$18,240.00
Olivia Wein	2019	99	$388	ALJ-357 See Attachment 3.	$38,412.00	99	$390.00[2]	$38,610.00
Olivia Wein	2020	33.75	$396	See Attachment 3.	$13,365.00	33.75	$395.00[3]	$13,331.25
Charles Harak	2018	22.8	$554	ALJ-345; ALJ-352 See Attachment 4.	$12,631.20	22.8	$555.00[4]	$12,654.00

Charles Harak	2019	1.4	$567	ALJ-357 See Attachment 4.	$793.80	1.4	$570.00[5]	$798.00
					Subtotal: $83,394			***Subtotal: $83,633.25***
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 $**
Oliva Wein	2018	14	$189.50	50% of Ms. Wein's 2018 hourly rate for time spent traveling. See Attachment 3.	$2,653.00	14	$190.00[6]	$2,660.00
Olivia Wein	2019	14	$194	50% of Ms. Wein's 2019 hourly rate for time spent traveling. See Attachment 3.	$2,716.00	14	$195.00[7]	$2,730.00
Charles Harak	2018	14.1	$277	50% of Mr. Harak's 2018 hourly rate for tie spend traveling. See attachment 4.	$3,905.70	14.1	$277.5[8]	$3,912.75
					Subtotal: $9,274.70			***Subtotal: $9,302.75***
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate**	**Total $**
Olivia Wein	2018	4.75	$189.50	50% of the Ms. Wein's 2018 hourly rate. See Attachment 3.	$900.13	4.75	$190.00[9]	$902.50
Olivia Wein	2020	12.5	$198	50% of the Ms. Wein's 2020 hourly rate. See Attachment 3.	$2,475.00	12.5	$200.00[10]	$2,500.00
					Subtotal: $3,375.13			***Subtotal: $3,402.50***
COSTS								
#	**Item**		**Detail**		**Amount**	**Amount**		

1.	Attorney travel expenses	Round trip airfare, taxi and lodging for travel made by Charles Harak in December 2018 from Boston, MA to San Francisco for attorney based in Boston	$876 See receipts in attachment 5.	$876.00
2.	Attorney travel expenses	Taxi and lodging for trip made by attorney Olivia Wein in October 2018 excluding expenses for food	$167.47 See receipts in attachment 5.	$167.47
3.	Attorney travel expenses	Round trip airfare for trip made by attorney Olivia Wein in October 2019 from Baltimore, MD to Ontario/LA, CA for attorney based in Maryland	$717.60 See receipts in attachment 5.	$717.60
4.	Attorney travel expenses	Round trip airfare and taxi for trip made by attorney Olivia Wein in July 2019 from Washington, D.C. to San Francisco, CA excluding extra baggage charge and food expenses.	$195 See receipts in attachment 5.	$195.00
			Subtotal: $1,956.07	***Subtotal: $1,956.07***
			TOTAL REQUEST: $97,999.90	***TOTAL AWARD: $98,294.57***

*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**
Olivia Wein	Admitted CA Admitted MD Admitted DC	CA Bar 178926 (Active, 12/7/1995; inactive 2002) MD Bar 199712180273 (Active 12/18/97) DC Bar 457638 (Active 2/6/1998)	No (CA) No (MD) No (DC)
Charles Harak	Admitted MA Bar 6/15/1977	MA Bar 221120 (active)	No (MA)

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

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	NCLC Harak Wein Timeslips R1807005
3	Information justifying hourly rate for attorney Olivia Wein
4	Information justifying hourly rate for attorney Charles Harak
5	NCLC Travel Receipts

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1][2] & [3] Calculation Adjustments for Wein	NCLC requests COLA adjustments for Wein, for work performed in 2018, 2019 and 2020. NCLC also requests application of 5% step increase. The commission finds the rates reasonable and adopts the rates with correct COLA calculations as follows: 2018 from $379 to $380.00 2019 from $388 to $390.00 2020 from $396 to $395.00

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

Incomplete Claim Preparation: PART IV; and Appendix	NCLC did not fully complete Part IV and Appendix of the claim. Claim preparation hours includes completion of all parts **to be completed by intervenor**. We will forgo deductions this time, however, warn NCLC to fully complete claim preparation in future claims.
[4] & [5] Calculation Adjustments for Harak	NCLC request COLA adjustments for Wein, for work performed in 2018 & 2019. The commission finds the rates reasonable and adopts the rates with correct COLA calculations as follows: 2018 from $554 to $555.00 2019 from $567 to $570.00
[6] & [7] Half Rate Calculation Adjustments for Wein	Travel hours are calculated at half the hourly rate. Corrections were made to reflect the right amount. The calculation was based on rates adopted at [1], [2], and & [3] above.
[8] Half Rate Calculation Adjustments for Harak	Travel hours are calculated at half the hourly rate. Corrections were made to reflect the right amount. The calculation was based on rates adopted at [4] & [5] above.
[9] & [10] Icomp Preparation Half Rate Calculation Adjustments for Wein	Icomp Preparation hours are calculated at half the hourly rate. Corrections were made to reflect the right amount. The calculation was based on rates adopted at [1] and & [3] above.

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. National Consumer Law Center has made a substantial contribution to D.20-06-003.

2. The requested hourly rates for National Consumer Law Center'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 $98,294.57.

CONCLUSION OF LAW

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

ORDER

1. National Consumer Law Center shall be awarded $98,294.57.

2. Within 30 days of the effective date of this decision, Southern California Edison Company, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Gas Company shall pay National Consumer Law Center their respective shares of the award, based on their California-jurisdictional electric and gas 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 and gas 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 28, 2020, the 75th day after the filing of National Consumer Law Center'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 July 15, 2021, at San Francisco, California.

MARYBEL BATJER
President
MARTHA GUZMAN ACEVES
CLIFFORD RECHTSCHAFFEN
GENEVIEVE SHIROMA
DARCIE HOUCK
Commissioners

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D2107022	Modifies Decision?	No
Contribution Decision(s):	D2006003		
Proceeding(s):	R1807005		
Author:	ALJ Wang		
Payer(s):	Southern California Edison Company, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Gas Company.		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
National Consumer Law Center	8/14/2020	$97,999.90	$98,294.57	N/A	*See* CPUC Comments, Adjustments and Disallowances

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Olivia	Wein	Attorney	$379	2018	$380
Olivia	Wein	Attorney	$388	2019	$390
Olivia	Wein	Attorney	$396	2020	$395
Charles	Harak	Attorney	$554	2018	$555
Charles	Harak	Attorney	$567	2019	$570

(END OF APPENDIX)