

Decision 22-01-008 January 13, 2022

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Develop an Electricity Integrated Resource Planning Framework and to Coordinate and Refine Long-Term Procurement Planning Requirements.

Rulemaking 16-02-007

**DECISION GRANTING COMPENSATION TO
PROTECT OUR COMMUNITIES FOUNDATION
FOR SUBSTANTIAL CONTRIBUTION TO DECISION 20-03-028**

Intervenor: Protect Our Communities Foundation	For contribution to Decision (D.) 20-03-028
Claimed: \$56,162.00	Awarded: \$52,007.50
Assigned Commissioner: Clifford Rechtschaffen ¹	Assigned ALJ: Julie A. Fitch

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.20-03-028: adopts a Reference System Portfolio (RSP) of 46 MMT to be used by all Load Serving Entities (LSEs), requires LSEs to present a portfolio based on a 38 MMT target, adopts modifications to the requirements for individual LSEs filing IRPs, adopts a reliability and policy-driven base case to be utilized to assess the need for transmission investments based on the 2018 Preferred System Portfolio (PSP), uses the 2019-2020 RSP as a policy-driven sensitivity case for the transmission planning process (TPP), and grants a petition for modification of D.19-11-016.
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¹ This claim was reassigned to Commissioner Clifford Rechtschaffen on February 12, 2021.

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:	2/25/14 (for R.13-12-010) 4/26/16 (for R.16-02-007)	Verified
2. Other specified date for NOI:	NOI filed on 3/27/2014 (for R.13-12-010), R.16-02-007 is the successor proceeding to R.13-12-010.	Verified. <i>See</i> R.16-02-007 Commission Rulemaking at 34-35.
3. Date NOI filed:	POC filed an Amended NOI on 9/6/2018 (for R.16-02-007) pursuant to ALJ Julie Fitch's August 15, 2018 email ruling which allowed parties to file revised NOIs.	Protect Our Communities Foundation filed the NOI on 9/7/2018.
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.18-12-005	Verified
6. Date of ALJ ruling:	4/17/2019	Verified
7. Based on another CPUC determination (specify):	D.15-12-045; D.19-04-031; D.19-05-035; D.19-10-047; D.19-12-017; D.20-04-021.	Noted
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.18-12-005	Verified
10. Date of ALJ ruling:	4/17/2019	Verified

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

	Intervenor	CPUC Verification
11. Based on another CPUC determination (specify):	D.15-12-045; D.19-04-031; D.19-05-035; D.19-10-047; D.19-12-017; D.20-04-021.	Noted
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.20-03-028	Verified
14. Date of issuance of Final Order or Decision:	4/6/2020	Verified
15. File date of compensation request:	6/5/2020	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
<p><u>Issue:</u> <u>Inputs and Assumptions</u></p> <p>Effective Load Carrying Capability (ELCC): At multiple stages (10/14/19, 12/17/19 and 3/17/2020), POC highlighted the importance of getting storage ELCC correct and was a leading voice in advocating for the revisions – revisions ultimately taken up and recommended by the commission in D.20-03-028.</p> <p>“All resources should be based on the average ELCC as that is the way they will be valued according to the planning standard. ELCCs need to be updated regularly to account for</p>	<p><i>Page numbers in this column reference D.20-03-028 unless otherwise noted.</i></p> <p>ELCC: The Commission agreed with POC's analysis on storage ELCC and directed staff to revise the ELCC curve in future modeling efforts. D.20-03-028, p. 89.</p> <p>“Several parties, including CESA, POC, and SCE, argued in comments on the proposed decision that the changed ELCC values for battery storage were inappropriately applied, according to the Astrape analysis. <i>These parties are correct</i> that the marginal capacity contribution of battery storage is highly dependent on the underlying load and resource mix. [] <i>In future IRP cycles, Commission staff will consider improvements to the ELCC curve, such as</i></p>	<p>Verified</p>

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<p>new resources, and the Commission should require regular updates.” (POC Comments, 10/14/2019, p. 17)</p> <p>“The ELCC Curves of solar and batteries have an extremely close relationship. Batteries make solar more valuable to the system and solar does the same for batteries.” (POC Comments, 12/17/2019, p. 11)</p> <p>“[T]he two ELCC curves illustrations for solar and storage do not appear to interact with one another as solar and wind do. Attachment A states that an ELCC curve for storage resulted from “the SERVVM model and the CPUC's SERVVM database populated with a preliminary RESOLVE 46 MMT portfolio to calculate the capacity contribution of storage in 2030 across a wide range of storage capacities.” Thus, it appears that the ELCC curve for storage in RESOLVE does not inform the ELCC curve for solar and other variable resources.” POC Comments, 12/17/2019, p. 13 (citations omitted).</p> <p>“[T]he ELCC understates the battery capacity value when: higher levels of solar are on the grid, when uneconomic dispatchable generators lifespans are extended, when 2,000MW of perfect capacity is added to the model, and when solar is artificially capped to increase</p>	<p>better accounting for interactive effects at different penetrations of wind and solar or different durations.” D.20-03-028, p. 89 (emphasis added).</p> <p>“With respect to battery effective load carrying capability (ELCC) assumptions, CESA, Eagle Crest, and POC all felt that further analysis should be performed to refine the battery ELCC curve before the next IRP cycle analysis.” D.20-03-028, p. 11 (emphasis added).</p>	<p>Verified</p>

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<p>diversity of generation sources. Higher levels of solar on the grid is a forgone conclusion as it is the cheapest form of generation. Thus, the capacity value of storage will increase for that reason.” (POC Comments, 12/17/2019, p. 13)</p> <p>D.20-03-028 notes that POC correctly evaluated the storage ELCC issue and directed Energy Division staff to make modeling changes in future cycles on page 89.</p> <p>“[T]he Commission’s own consultant modeled the ELCC curve and concluded “[i]n the context of a highly-renewable portfolio in 2030, the potential for energy storage resources to meet resource adequacy needs is significant: up to approximately 10 GW of energy storage resources could effectively serve as substitutes for perfectly reliable capacity.” Inexplicably rejecting its own consultant’s conclusions, Commission Staff posits that “Batteries + solar is an untested reliability paradigm and the combined capacity contribution of these resources has significant uncertainty.” These two viewpoints illustrate how solar plus storage is both ready for large scale system use, and creates concern at the Commission regarding the implementation scale needed to reach California’s clean energy</p>	<p>As noted earlier in this column, the decision noted that the ELCC curve needs to be updated and that parties were correct in their analysis that a modeled static curve was insufficient to capture the characteristics of a dynamic grid build-out. D.20-03-028, p. 89.</p>	<p>Verified</p>

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<p>targets.” (Citations omitted, POC Comments, 12/17/2019, p. 18)</p> <p>“[A]ny time renewables penetration on the grid increases, so does the value of storage and the associated ELCC, as POC noted in its opening comments.¹⁵ The ELCC curve added to the model uses 2022 as the grid portfolio to which the ELCC curve applies. However, as noted earlier, the PD claims that the 2045 goals for GHG-free energy will not be achieved until 2045. That means a 2045 grid portfolio – 100 emissions free energy – is the appropriate portfolio from which to develop the ELCC curve to use between now and 2045, otherwise all modeling outputs will improperly discount the value of solar, wind, and storage.” (POC Reply Comments, 3/17/2020, p. 4)</p> <p>Import Limits: POC provided the most robust argument in favor of historical import levels including historical review of actual imports during each year of the last decade (POC comments 7/22/2019 at p. 4.). POC repeatedly noted the conservativeness of the import levels in the modeling. D.20-03-028 highlighted that the modeling would be adjusted to increase to the import cap.</p> <p>“In the standard reference portfolio modeling, the modeling team decided artificially to</p>	<p>Import Limits: The Commission agreed with analysis by POC and others regarding the overly conservative import limit initially imposed. In response, the decision increased the 5 GW import constraint to 6.5 GW. D.20-03-028, p. 39.</p>	<p>Verified</p>

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<p>restrict imports to 5,000 MW. Such a low import limit does not comport with recent historical import levels. CAISO maintains published reports showing the maximum import levels during times of high overall load on the CAISO system. The maximum imports during the last 3 years during times of high system load totaled 11,147 MW – an import level more than double the artificial import cap used in the reference modeling run. It is important to note that 11,147 MW comprises the maximum import that actually occurred in the real world and not a maximum theoretical import limit. The maximum theoretical import limit is higher still.” (Citations omitted, POC Comments 12/17/2019 p. 16)</p> <p>“Without the cap, the LOLE remained well below the 0.1 maximum at 0.000 in 2022, 0.000 in 2026, and 0.005 in 2030. However as soon as the 5,000 MW import cap was added, all modeled years jumped above 0.1 LOLE, failing the reliability requirement.” (Citations omitted, POC Comments 12/17/2019 p. 19)</p> <p>“If the Commission were to require the IOUs to only buy storage in paired configurations and eliminated the import cap, the findings according to the “high RA imports” sensitivity and “paired battery costs” sensitivity</p>	<p>“Given the conservativeness of setting the constraint at 5 GW and the many parties cautioning that it could lead to over-procurement and/or unnecessary ratepayer costs, Commission staff ultimately chose to relax the constraint by 1.5 GW, effectively setting the import limit at 6.5 GW during late summer evenings.” D.20-03-028, p. 39.</p> <p>“On the import assumptions, parties had mixed opinions on whether to use 5 GW as the import limit (CAC, AWEA, and CalWEA supported this level), the MIC level of 11 GW (UCS, Cal Advocates, and POC supported this level) or something else (Powerex supported a 3 GW import limit).” D.20-03-028, p. 33 (emphasis added).</p> <p>“Numerous parties [including POC] were also concerned about the reduction in import limits for this IRP cycle, and how they were implemented both in the RESOLVE and SERVVM models.” D.20-03-028, p. 12 (emphasis added).</p>	<p>Verified</p> <p>Verified</p> <p>Noted</p>

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<p>modeling runs show that the 30 MMT scenario would save \$887 million per year compared to the default 30 MMT scenario. If the assumptions were revised to omit the artificial import caps that are not based in any fact and revised to pair battery installations with solar installations, then the cost difference between the 46 MMT reference case and the 30 MMT with the selected sensitivities would drop to \$734 million per year. This cost represents just a 3 percent increase to ratepayers, based on the \$26 billion combined revenue requirement of the IOUs.” (Citations omitted, POC Comments 12/17/2019 p. 21)</p> <p>Gas Retirement:</p> <p>“Retention of all of the current thermal generation fleet is not reasonable, nor is it desirable. As detailed in the answer to question 8, without the artificial cap on the import limit, which lacks any factual basis, the LOLE of the system remains well below the unreliability threshold of 0.1. Thus, the Commission Staff should re-run the modeling without an artificial cap on imports to determine how many gas plants could be retired while still maintaining a reliable system.” (POC Comments 12/17/2019 p. 24)</p>	<p>Gas Retirement:</p> <p>POC and others highlighted the need - both statutory need and health need - for the commission to properly measure criteria air pollutants and then reduce those pollutants starting in disadvantaged communities. The decision stated:</p> <p>“CalCCA, CEJA, POC, and SEIA opposed thermal retention because the approach was too simplified and/or does not take into account criteria air pollutants in local areas, as well as statutory mandates on these topics.” D.20-03-028, p. 52 (emphasis added).</p> <p>The Commission agreed with POC making multiple adjustments related to criteria pollutants.</p>	<p>Verified</p> <p>Verified</p>

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<p>“[N]o new gas was selected in any new policy case, which demonstrates that renewable energy and batteries have taken over as the undisputed new low-cost resources.⁴⁴ Second, the Commission’s own consultant modeled the ELCC curve and concluded “[i]n the context of a highly-renewable portfolio in 2030, the potential for energy storage resources to meet resource adequacy needs is significant: up to approximately 10 GW of energy storage resources could effectively serve as substitutes for perfectly reliable capacity.” (Citations Omitted, POC Comments 12/17/2019 pp. 17-18)</p> <p>“SDG&E ignores the fact that gas generation constitutes by far the largest single source of electricity in the state, providing more than three times the amount of electricity compared to the next closest generation source – large hydro power. Diversification requires gas retirement rather than gas retention.” (Citations Omitted, POC Comments 1/6/2020 p. 4)</p> <p>BTM: While D.20-03-028 did specifically adopt POC’s BTM’s recommendation based on POC analysis of the historical and recent trends of installations compared to IEPR’s mid-case scenario’s, POC’s analysis influenced the discussion with</p>	<p>“Commission staff also re-ran the criteria pollutants analysis that was included with the November 6, 2019 ALJ ruling, based on the new 2019-2020 RSP being adopted in this decision. Detailed results will be posted on the Commission’s web site shortly.” D.20-03-028, p. 45.</p> <p>“In addition to those requirements, all LSEs are required to explain how they have evaluated opportunities and feasible procurement to reduce reliance on natural gas generation between now and 2030.” D.20-03-028, p. 64.</p> <p>“Finally, in the CSP Calculator, Commission staff have made several improvements. The CSP Calculator now includes an automated approach to calculating criteria air pollutants associated with the LSE’s portfolio.” D.20-03-028, p. 65.</p> <p>BTM Resources: POC presented historical data to inform the Commission about the lack of accuracy in BTM projections. POC’s analysis broadened the discussion of resource considerations by highlighting additional areas in need of revisions. POC’s input on BTM resources enhanced the Commission’s consideration of all resources. The decision stated:</p>	<p>Verified</p>

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<p>fact-based findings leading to more informed opinion by the Commission.</p> <p>“The baseline assumptions for behind-the-meter (“BTM”) solar and storage have not kept up with the accelerating pace of installations. The IEPR installation projections are continuing on a fairly straight line, however, reported MW installations of BTM solar are accelerating. The solar industry reported that in Q3 2019 “[t]he U.S. saw record-setting residential solar capacity added with more than 700 MW installed.” Typically the most residential solar installations occur in the fourth quarter so seeing a third quarter record indicates accelerating growth.” and “Commission staff should review the BTM inputs received via the IEPR and consider running a modeling sensitivity using the highest BTM solar plus storage installations projected by the Energy Commission through the 2030 time-horizon.” (Citations Omitted, POC Comments 12/17/2019 pp. 2-3.)</p> <p>Battery Storage: POC’s recommendations on battery storage addressed other parties’ hesitation in using large amounts of energy storage. D.20-03-028 agreed with POC that large amounts of storage will be needed.</p>	<p>“POC recommended that the Commission take the BTM inputs developed as part of the IEPR as a modeling sensitivity for DERs. They would prefer we use the “high” case developed in the IEPR for this purpose.” D.20-03-028, p. 50 (emphasis added).</p> <p>Battery Storage: D.20-03-028 agreed with POC that the optimal course of procurement is to continue to direct LSEs in purchasing a “large amount of storage.” D.20-03-028, p. 70.</p> <p>“To continue making progress toward future TPP cycles, Commission staff will continue to work with the CAISO and the</p>	<p>Verified</p>

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<p>“Now that Commission Staff and the ALJ have adjusted solar and battery prices closer to the actual market prices for the new version of the model in the 2019-2020 cycle, OOS wind resources have been found to be more expensive, as previously calculated by POC. The Ruling states “[i]n the case of out-of-state wind, it is worth noting that this resource [out of state wind] was not selected by RESOLVE in this current RSP development, most likely due to reduced solar and battery costs since the last round of analysis.”” (Citations Omitted, POC Comments 12/17/2019 pp. 3-4.)</p> <p>“overreliance on battery storage is a misnomer -- clearly the more batteries on the system, the easier renewable integration becomes. However, POC disagrees that more procurement early in the decade would result in significant price reduction later in the decade.” (Citations Omitted, POC Comments 12/17/2019 pp. 3-4.)</p> <p>“Based on the reasoning above, it is not a coincidence that RESOLVE recommends large solar purchases earlier in the decade and larger battery purchases late in the decade – as the RESOLVE model demonstrates, that is the most cost-effective approach. POC recommends following the model recommendations while continuing to increase the accuracy of the inputs and</p>	<p>CEC to develop and vet a methodology for siting of the large amount of storage resources anticipated to be needed by 2030 according to the 2019-2020 RSP.” D.20-03-028, p. 12.</p> <p>D.20-03-028 agreed with POC that a large amount of storage would be needed during this decade. D.20-03-028, p. 70.</p> <p>“Several other parties, including CalCCA, CESA, CEJA/Sierra Club, NRDC, POC, SEIA, VoteSolar, and SCE, were bullish on battery storage and urged the Commission not to limit its development.” D.20-03-028, pp. 51-52 (emphasis added).</p>	

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<p>assumptions.” (POC Comments 1/6/2020 p. 9.)</p> <p>Hydroelectric Resources:</p> <p>POC highlighted for the Commission the significant risks associated with the shortfall of hydroelectric power during drought years.</p> <p>“Hydroelectric generation contains significant risk of under production in drought years. The only way for an LSE to plan for this risk is to assume every year will be a worst-case drought year. Then the LSE must procure generation capacity to supply the remaining demand. In the current system which has dispatchable supply, the worst-case drought year planning standard is not as necessary as it will be in the future when all or nearly all generation will be non-dispatchable or dependent on storage resources. In the future, worst case planning form hydroelectric resources will be a necessity. The standard should be set for the worst case hydroelectric generation assumed for drought years.” (POC Comments 10/14/2019 p. 14)</p>	<p>Hydroelectric Resources:</p> <p>D.20-03-028 agreed with POC's recommendation and added requirements to the LSEs' IRP templates to require more analysis of hydroelectric risk. D.20-03-028, p. 64</p> <p>“sections in the Narrative Template have been added to require LSEs to address risks of reliance on hydroelectric generation” p. 64.</p> <p>“POC argued that the LSEs should plan for the “worst case” scenario for in-state drought.” D.20-03-028, p. 60 (emphasis added).</p>	<p>Verified</p>
<p><u>Issue:</u> <u>Portfolio Composition</u></p> <p>GHG limits:</p> <p>POC focused on legal and technical arguments to provide a</p>	<p>GHG limits:</p> <p>The Commission considered the voluminous evidence that POC and other</p>	<p>Verified</p>

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<p>unique contribution to the position of multiple parties on this issue.</p> <p>“SB 100 and EO B-55-18 state California’s policy to achieve zero net GHG emissions “<i>as soon as possible</i>, and no later than 2045.” The PD however uses the highest possible GHG target of 46 MMT rather than the lowest considered target of 30 MMT without sufficient analysis or support.” (Citations omitted, POC Comments 3/12/2020 p. 9)</p> <p>“Lower GHG emissions result in lower health costs, lower climate change-related costs, and a more productive society. The Commission should target greater emissions reductions at least down to the 30 MMT level – the lowest MMT level modeled.” (POC Comments 12/17/2019 p. 21.)</p> <p>“As shown in Figure 1 [POC original analysis], not only would the state fail to achieve net zero GHG emissions in 2045, with GHG emissions still above 25 MMT in that year, it would be at least another 30 years before the goal is achieved. The PD must be revised to note that a 46 MMT goal for 2030 will push the vast majority of necessary GHG reductions into the next decade. The reductions will not occur on a straight line if the Commission adopts a 46 MMT GHG goal for</p>	<p>parties presented about the need for further limiting GHG emissions in the utilities’ portfolios. D.20-03-028 agreed with POC’s analysis and changed the decision from the original PD to allow LSEs to file their own alternate portfolios below the 46 MMT GHG emissions level set for the RSP. D.20-03-028, p. 62</p> <p>The Decision concludes “we are going to take this request a step further. In order to keep the IRP process moving forward evaluating the preferences of individual LSEs, we will require that each LSE submit at least two “conforming” portfolios: one that addresses the LSE’s proportional share of the 46 MMT GHG target, and another that addresses the LSE’s proportional share of a 38 MMT target.” D.20-03-028, p. 62</p> <p>“AWEA, CESA, CEERT, CEJA, Sierra Club, Eagle Crest, NRDC, POC, SDCWA, City of San Diego, SEIA, Vote Solar, LSA, TransWest, and UCS all supported a 30 MMT Scenario, because they argued it would put the state on track to meet the Senate Bill (SB) 100 (DeLeón, 2018) goals and is similar in buildout needed by the 2045 Framing Studies to meet the 2045 GHG goals.” D.20-03-028, p. 25 (emphasis added).</p> <p>“In response to the staff proposal that the provision for alternative portfolios be eliminated, POC, CESA, CEJA, CCSF, and SCE commented against the idea, arguing that LSEs need the chance to propose their own preferred portfolios.” D.20-03-028, p. 59 (emphasis added).</p> <p>“parties, in comments on the proposed decision, requested that LSEs be allowed</p>	

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<p>2030.” (POC Comment 3/17/2020 p. 2.)</p> <p>“The PD explains that alternate portfolios filed in the last IRP cycle were administratively inconvenient when assembling an aggregated portfolio, leading to considerable additional work for staff. To lessen the burden on staff, one solution would be to allow alternate portfolios within a common framework defined by the Commission. However, the elimination of alternative portfolios solely to lessen the administrative reporting burden on staff – represents misplaced priorities. Individual LSE IRPs are hardly needed if the Commission permits no deviation from the conforming resource allocation template. This approach may satisfy the Commission’s and CAISO’s preference for statewide conformity, but it hampers innovation and creativity in resource procurement at a time when fast action on climate change remains essential.” (POC Comment 3/17/2020 p. 13.)</p>	<p>to continue to submit alternative portfolios to better represent their individual resource preferences, as well as the potential to go beyond the GHG targets set by the Commission. Parties requesting this flexibility included CalCCA, SCE, CalWEA, CEERT, CCSF, POC, and CEJA/Sierra Club.” D.20-03-028, p. 62 (emphasis added).</p> <p>“Numerous parties voiced their disagreement and concern that the Commission should plan for a lower GHG target for the electric sector in 2030, including 350 Bay Area, AWEA, Joint CCAs, CEDMC, CESA, DOW, Eagle Crest, EDF, GridLiance, Hydrostor, NRDC, POC, Sierra Club/CEJA, SCE, UCS, Vote Solar/LSA/SEIA, and SWPG.” And “[Parties] requested that the Commission allow individual LSEs to plan for and go beyond their proportional share of a 46 MMT GHG emissions target by 2030, by submitting alternative portfolios as part of their individual IRPs, instead of being limited to “conforming” portfolios only (utilizing the common assumptions from the 46 MMT portfolio). Parties recommending this individual LSE flexibility included CalCCA, Joint CCAs, SCE, CalWEA, CEERT, CCSF, POC, and CEJA/Sierra Club.” D.20-03-028, p. 86 (emphasis added). In response the commission “addressed both of the above issues by modifying this decision” to require two portfolios 38MMT and 46MMT and allow for additional alternative portfolios. <i>Ibid.</i></p> <p>“Several parties, including POC and Sierra Club/CEJA, were concerned in their comments on the proposed decision that criteria pollutant appear to increase</p>	<p>Verified</p>

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<p>Pumped Storage:</p> <p>POC successfully advocated that the Commission should avoid selecting specific resources – such as pumped storage, and instead should allow the modeling to reveal the most cost-effective resources that meet state goals.</p> <p>“If California wants to build in diversification, POC recommends diversifying through purchasing a buffer of excess solar and battery resources rather than diversifying into more expensive resources with less flexibility. [] A similar reasoning applies to pumped storage. [Selecting pumped storage] depends on the cost, the flexibility of the resource and the fact-based cost comparisons to the cheapest available renewable resource.” (POC Comments 12/17/2019, p. 26)</p>	<p>between 2022 and 2030. [] we agree [] additional attention is warranted in the area of criteria pollutants.” D.20-03-028, p. 90 (emphasis added).</p> <p>Pumped Storage:</p> <p>The decision adopted POC’s recommendation to avoid specific storage resources such as pumped storage. The Commission followed POC’s recommendation to evaluate costs and explore the best generic long-duration storage - rather than specifically pumped storage. Highlighting the need for best fit resources rather than specific resources, the decision stated that it will not consider specific resource technologies but rather general groups of resources that meet specific grid needs. On pumped storage it agrees with POC stating:</p> <p>“pumped-storage hydro resources are a proxy in general for long-duration storage resources.” D.20-03-028, p. 63.</p> <p>“CalCCA, CalWEA, DOW, GPI, LS Power, Nature Conservancy, Cal Advocates, POC, Range, and SWPG all opposed the initiation of procurement or development activities to support pumped storage facilities.” D.20-03-028, p. 53 (emphasis added).</p>	<p>Verified</p>
<p>Load Share:</p> <p>“It is unclear from the Staff proposal whether the IEPR will dictate significantly different load forecasts to LSEs than the LSE’s forecast to the CEC. Until the IEPR requires forecasts from each LSE and until the first round of CEC forecasts based on those</p>	<p>Load Share:</p> <p>The Commission agreed with POC that load shapes differ among LSEs and added tools to address the different load curves. D.20-03-028, p. 66.</p> <p>D.20-03-028 stated “a load-modifier toggle has been added for LSEs with load</p>	<p>Verified</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>LSE submittals, it is impossible to say how the CEC will revise the forecasts and reasonably comment on how well the forecasts might align with actual LSE demand. Thus, POC proposes to allow LSEs to flexibility in their demand forecasts and the resultant needed procurement.” (POC Comments 10/14/2019, p. 10)</p> <p>“As installed battery capacity increases across the grid, the additions will not be uniform. Installations will likely vary significantly between LSEs. As a result, differences in load shapes from LSE to LSE will continue to grow. Correspondingly LSE’s load shapes should become more and more customizable within CSP so that the CSP maintains its ability to accurately report an LSE’s likely system level GHG emissions percentage.” (POC Comments 10/14/2019, p. 22)</p> <p>Resource Location: “In the Staff proposal “Reported Contracted and Planned Resources” defines “medium term as “COD by 2026.” POC is concerned that medium term overlaps long term in some instances. It appears that by defining COD 2026 as medium term Staff is lending urgency to resource procurement which is a full 7 years away. Resource planning should be as flexible as possible. While transmission planning must have some lead</p>	<p>shapes that are different from the system average (e.g., a higher share of commercial and industrial load) to more accurately reflect their expected customer load.” D.20-03-028, p. 66.</p> <p>“SCE, SDG&E, POC, AReM, CalCCA, and CCSF strongly opposed the use of the IEPR to apportion load, because it would be inaccurate, unfair, and lead to distorted results and the inability to assess reliability.” D.20-03-028, p. 59 (emphasis added).</p> <p>“Parties also made numerous comments about the CSP Calculator. [] POC similarly argued that the tool should rely on LSE-provided load shapes because of the new hybrid resources entering the market that could have unique load shapes compared to historical resources.” D.20-03-028, p. 61 (emphasis added).</p> <p>Resource Location: POC highlighted ways for the Commission to update LSE reporting and planning to maximize optionality and efficiency of the system. While D.20-03-028 did not specify a finding on this issue, POC’s analysis informed the Commission’s consideration of this issue.</p> <p>“Parties supporting the staff proposal to allow LSEs to specify a development zone for near-term resources, but state no preference in the longer term included [list of parties]. POC, AReM, CCSF,</p>	<p>Verified</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>time, the most important piece of the procurement puzzle remains an LSE's flexibility to adapt to new low-cost resource availability. Filing requirements should incentivize seizing new opportunities rather than providing direction to LSEs that resource zone and COD need to be selected 7 years in advance." (Citations Omitted, POC Comments 10/14/2019, p. 12-13.)</p> <p>Resource Shuffling: POC supported the need to determine an accurate way to eliminate resource shuffling, but opposed the TURN/NRDC proposal because it would not actually eliminate resource shuffling. The Commission agreed with POC.</p> <p>"Staff proposes allowing "LSEs to claim the low-carbon energy from contracts with hydro-dominated ACS systems using the hourly dispatch profile of Pacific Northwest hydro, consistent with the Reference System Portfolio." As a threshold matter, this approach should be considered only after the Commission has determined how it will eliminate resource shuffling as required by SB 100. Until rules eliminating resource shuffling are initiated, all Pacific Northwest hydropower should be assumed to be backfilled with fossil-fuel resources." (Citations</p>	<p>PG&E did not object to this suggestion but thought it should go further, not to require geographic specificity except in the very near term." D.20-03-028, p. 60 (emphasis added).</p> <p>Resource Shuffling: D.20-03-028 adopted POC's position on resource shuffling which was to further consider aspects of resource shuffling rather than adopt a qualitative attempt to address shuffling. D.20-03-028, p. 66.</p> <p>"On the staff-proposed narrative requirement around resource shuffling, several parties doubt whether the requirement will provide the necessary information to assess whether resource shuffling is occurring, including CEJA, Sierra Club, TURN, NRDC, and POC." And "POC argued in reply comments that the TURN/NRDC proposal is not sufficient because it is qualitative and not quantitative." D.20-03-028, p. 60 (emphasis added).</p> <p>D.20-03-028 agreed with POC stating:</p> <p>"we agree that further analysis is needed regarding what data may be needed in addition to information from LSEs, the extent to which the Commission can use existing CARB Cap and Trade program rules and definitions, and the need to</p>	<p>Verified</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>omitted, POC Comments, 10/14/2020 p. 21)</p> <p>“POC suggests that the TURN/NRDC proposal would not result in the elimination of resource shuffling because: 1) the method is qualitative rather than quantitative, and 2) the method only addresses primary and secondary dispatch while ignoring tertiary dispatch and beyond. Thus, the Commission should adopt POC’s proposal for eliminating resource shuffling.” (POC Comments, 10/25/2020 p. 9)</p> <p>“A simple way exists to stop resource shuffling: require that all new contracts that California LSEs sign with OOS generators must be for GHG-free energy. New contracts must also either be for electricity from a newly-built generator or must be with an existing generator whose contracted electricity supply immediately preceding the new contract was also contracted to serve California load, thus eliminating the possibility that a GHG-free power plant could be signed over to California while allowing local energy in the state of the generation source to be back-filled with power from a fossil-fuel generator.” (POC Comments, 10/14/2020 p. 15)</p> <p>Sensitivity: D.20-03-028 found POC’s recommendation - to increase the</p>	<p>investigate a “credible counterfactual scenario” to assess the impact of LSEs’ procurement of zero-GHG imports that would otherwise be serving out-of-state loads. Therefore, we will continue to explore these concerns but will not explicitly adopt the TURN/NRDC proposal at this time.” D.20-03-028, p. 66.</p> <p>POC further provided the Commission a simple quantitative solution to eliminate resource shuffling. Thus, as the Commission will “continue to explore these concerns,” it has in the record an additional option to consider. D.20-03-028, p. 12.</p>	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>import limit – to have merit and started increasing the cap in modeling work.</p> <p>“[E]ven the 10,200 MW cap shows the value of modeling RA imports at levels approaching historic levels. Not only do historic import levels allow for a more cost-effective grid in the modeling outputs, it allows for a cleaner grid by allowing retirements of in-state gas generators.” (POC Comments at 12/17/2019 p. 16)</p> <p>“Using the existing transmission produces multiple benefits. It decreases costs by allowing LSEs to let their contracts with gas generators expire. It decreases costs by reducing the amount of storage needed for a maintain reliable system. Finally, it the results in lower overall GHG emissions. Each of these benefits is clearly demonstrated when comparing the cost summaries on the sensitivities page.” (Citations omitted, POC Comments at 12/17/2019 p. 20)</p>	<p>Sensitivities: D.20-03-028 found POC's recommendations reasonable regarding increasing the import limit. D.20-03-028, p. 39.</p> <p>Regarding RPS modeling POC requested additional sensitivities be run such as “More battery cost and performance variability (Eagle Crest, POC, SDCWA, City of San Diego);” and “A higher import limit (POC)” both of which would have significant impacts on existing future procurement decisions. D.20-03-028, p. 14 (emphasis added).</p> <p>D.20-03-028 at p. 39 agreed with POC noting that even without an additional sensitivity run, that a higher import limit was needed and would be used in future modeling.</p> <p>“Commission staff ultimately chose to relax the constraint by 1.5 GW, effectively setting the import limit at 6.5 GW during late summer evenings.” D.20-03-028, p. 14.</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.	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes.	Verified
c. If so, provide name of other parties: Sierra Club, California Environmental Justice Alliance, Union of Concerned Scientist, Natural Resources Defense Council, CalCCA and others.		Verified
<p>d. Intervenor's claim of non-duplication:</p> <p>Throughout the proceeding, POC participated in regular phone calls discussing the proceeding's issues with CCA representatives, environmental justice advocates, and environmental advocates. This coordination allows POC to focus on the most pressing issues unaddressed by other parties, and for POC to add a different perspective to issues on which other parties also commented. Thus, POC made arguments that were not made by other parties.</p> <p>POC demonstrated leadership in areas related to resource cost effectiveness, resource shuffling solutions, storage ELCC analysis, import limit opposition, advocacy for reduction in GHG emissions, and analysis of the best use of and the cheapest types of storage. On these topics, POC submitted data and evidence not developed by other parties.</p> <p>POC contributed in unique ways to consideration of the following issues:</p> <p>(1) POC is the only party thus far that has presented a recommendation on the topic of resource shuffling which would eliminate resource shuffling as called for by California statute. POC's proposal does not depend on qualitative criteria as other party's proposals do, nor would LSEs be able to skirt POC's proposed resource shuffling rules simply by implementing secondary or tertiary dispatch strategies.</p> <p>(2) On the subject of ELCC, the Decision called out POC's analysis as "correct" and further held that "In future IRP cycles, Commission staff will consider improvements to the ELCC curve." POC was the only party to highlight that staff modeling used the Commission consultant's ELCC curve in a way that the consultant's report explicitly warned against.</p>		Noted

³ The Office of Ratepayer Advocates was renamed the Public Advocate's Office of the Public Utilities Commission pursuant to Senate Bill 854, which the Governor approved on June 27, 2018.

	Intervenor's Assertion	CPUC Discussion
<p>To the extent POC's arguments were similar to other parties' arguments, they supplemented, complemented, and contributed to the presentations by other parties; and they were neither unproductive nor unnecessary. POC worked diligently to ensure that its involvement added to the Commission consideration of specific issues in the final Decision.</p> <p>All of POC's comments were necessary for a fair determination of the proceeding because they were relevant in that they addressed only issues directly related to D.20-03-028, as demonstrated by the scoping memo, other rulings setting forth the scope of the proceeding, and the language in D.20-03-028. To POC's knowledge, no other party participating in this proceeding is focused on representing the interests of Southern California and San Diego residential utility ratepayers both with respect to ratepayer and environmental protection.</p>		

C. Additional Comments on Part II:

#	Intervenor's Comment	CPUC Discussion
II(A)	<p>Substantial Contribution Includes Partial Success.</p> <p>The Commission's decisions establish that a finding of substantial contribution is not dependent upon the Commission's adoption of a party's contention entirely, or at all. Pub. Util. Code, § 1802(j); D.08-04-004, p. 4-6; D.03-03-031, p. 6; D.10-12-061, p. 4, fn. 11; D.19-10-019, p. 3-4; D.01-06-063, p. 5-6.</p> <p>Pursuant to the Commission's longstanding interpretation of the intervenor compensation statute, intervenors benefit the Commission when they provide a full discussion of the issues up for consideration so that the Commission may consider "the consequences of adopting or rejecting" the parties' proposals. D.08-04-004, p. 5-6; D.19-10-019, p. 3-6.</p> <p>The intervenor compensation statutory scheme is intended to "be administered in a manner that encourages the effective and efficient participation of all groups that have a stake in the public utility regulation process." Pub. Util. Code, § 1801.3, subd. (b); <i>see also</i>, D.03-03-031, p. 11.</p>	Noted
II(B)(d)	<p>Duplication. No reduction to POC's compensation due to duplication is warranted given the standard adopted by the</p>	Noted

#	Intervenor's Comment	CPUC Discussion
	<p>Commission in D.03-03-031 and consistent with Public Utilities Code Sections 1801.3(b) & (f), 1802(j), 1802.5, and 1803.</p> <p>Section 1803 sets forth the requirements for awarding intervenor compensation. Pub. Util. Code, § 1803; D.03-03-031, p. 12-14.</p> <p>Section 1801.3(f) seeks to avoid only (1) “unproductive or unnecessary participation that duplicates the participation of similar interests otherwise adequately represented” or (2) “participation that is not necessary for a fair determination of the proceeding.” Pub. Util. Code, § 1801.3, subd. (f); D.03-03-031, p. 15-18.</p> <p>Section 1802.5 provides for full compensation where participation “materially supplements, complements, or contributes to the presentation of another party.” Pub. Util. Code. § 1802.5; <i>see also</i> D.03-03-031, p. 14.</p>	

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>POC's advocacy reflected in this claim substantially contributed to a decision that will impact California ratepayers and the public at large. While it is impossible in this case to provide an actual dollar value of the benefit to ratepayers of POC's participation, at every turn, POC used data and original analysis to point the Commission toward the most cost-effective ways for California to achieve its 100% GHG-free energy target. The best way to determine the most cost-effective approach for this energy transition – fossil to clean energy – would be for the Commission to run the most accurate modeling possible. As such, POC spent the vast majority of its time on modeling inputs and assumptions as well as the resulting portfolio compositions. POC continually recommends – and supports its recommendations with analysis and evidence - that the Commission take the least expensive path toward its clean energy target rather than favoring one solution over another. POC's participation lead to the decision calling for more accurate modeling and cheaper, cleaner portfolios. Thus, POC's participation resulted in significant ratepayer benefit.</p>	Noted

	CPUC Discussion
<p>Unlike many parties to the proceeding, POC does not represent industries but rather represents the interests of Southern California ratepayers. One illustration of POC's protection of ratepayers relates to its position on pumped storage. Even though POC recognizes the need for large quantities of storage, it recommended against pumped storage specifically because the Commission must follow the least-cost path rather than favor specific technologies. Further, POC's analysis regarding input costs for various technologies continues to keep the Commission apprised of the latest cost trends, thus, leading to more accurate modeling inputs. POC's review of these trends and the resulting revisions to the modeling - called for in the decision - will lead to ratepayer savings, likely in the hundreds of millions of dollars. Such a savings highlights the clear value to ratepayers that POC provided in these proceedings.</p> <p>In another example of POC's protection of ratepayers was demonstrated in the proceeding. Industry players, advocating for their specific energy solutions, called for an increased model input price for solar. They recommended the Commission increase solar prices by 50-100%, in response, POC offered evidence about five signed contracts in California and across the west with prices even lower than the RESOLVE model's inputs. (POC Comments 1/6/2020 at p. 6). POC's analysis and evidence expands the information available for the Commission to consider, resulting in the adoption of rules and models that will provide significant monetary benefits to ratepayers.</p> <p>POC's fees are small compared to the benefits that California ratepayers are likely to realize from POC's contributions.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>POC relied on its in-house energy expert, along with minimal time contributed by an additional expert and lawyer, to address the complex and controversial issues raised in this proceeding. POC's staff expert took the lead on each major filing, and the outside expert was used as needed on limited and specific issues within his particular expertise. POC used its board member's and lawyer's time in a limited capacity to address legal and statutory analyses. The use of POC's staff and the limited use of POC's board members, allowed POC to leverage its team's many years of expertise, while limiting hours expended and costs.</p> <p>POC efficiently spent time to research the historical data it provided to the Commission. POC's data and analysis gave the Commission a thoroughly researched alternative to the staff recommendations. POC's energy expertise allows it to quickly and accurately provide the Commission important historical trends and analysis of the latest technological advances, to inform areas where</p>	Noted

	CPUC Discussion
<p>the modeling should be revised to further advance the most cost-effective solutions.</p> <p>POC spent a reasonable and prudent amount of time on this matter, working diligently to address complex issues in an efficient and expedient manner.</p> <p>POC generally did not include hours spent in this proceeding dedicated to team discussions of the proceeding. POC did not included miscellaneous administrative work, filing and reading of emails related to the proceeding, and other coordination tasks.</p> <p>Thus, all the hours claimed in this request were reasonably necessary to the to POC's participation in this proceeding.</p>	
<p>c. Allocation of hours by issue:</p> <p>Based on the detail in the timesheets and the personal knowledge of POC's staff, the approximate allocation of time by substantive issue is as follows:</p> <p>GP - General Participation – 10% This category of costs includes non-issue specific participation in Phase 2 of this proceeding such as reviewing Commission orders and other parties' filings.</p> <p>IA – Inputs and Assumptions– 45% This issue covers: ELCC, Imports Limits, Gas Retirement, BTM Resources, Battery Storage, Hydroelectric Resources</p> <p>PC – Portfolio Composition – 45% This issue covers: GHG Limits, Pumped Storage, Load share, Resource Location, Resource Shuffling, and Sensitivities</p>	Noted

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Loretta Lynch (Senior Attorney)	2020	5.75	\$614.00	See comment #1	\$3,530.50	5.25 [6]	\$630.00 [1]	\$3,307.50
Bill Powers (Expert)	2019	8.5	\$291.00	See comment #2	\$2,473.50	6.5 [7]	\$290.00 [2]	\$1,885.00

CLAIMED						CPUC AWARD		
Bill Powers (Expert)	2020	13	\$291.00	See comment #2	\$3,783.00	12.5 [8]	\$295.00 [3]	\$3,687.50
Tyson Siegele (Expert)	2019	62.5	\$266.00	See comment #3	\$16,625.00	58.5 [9]	\$270.00 [4]	\$15,795.00
Tyson Siegele (Expert)	2020	95	\$280.00	See comment #3	\$26,600.00	83 [10]	\$290.00 [5]	\$24,070.00
Subtotal: \$53,012.00						Subtotal: \$48,745.00		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Tyson Siegele	2020	22.5	\$140.00	half compensation for 2020 rate	\$3,150	22.5	\$145.00	\$3,262.50
Subtotal: \$3,150.00						Subtotal: \$3,262.50		
TOTAL REQUEST: \$56,162.00						TOTAL AWARD: \$52,007.50		
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§ 1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors’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.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer’s normal hourly rate</p>								
ATTORNEY INFORMATION								
Attorney	Date Admitted to CA BAR ⁴		Member Number			Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation		
Loretta Lynch	1990		151206			No		

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

Attachment or Comment #	Description/Comment
Attmt #1	Certificate of Service
Attmt #2	Attorney and Experts Time Sheets and Categorization
Attmt #3	Biography of Attorney and Expert

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

Attachment or Comment #	Description/Comment
Comment #1	<p>Basis for rate: 2018: POC requested an hourly rate for Ms. Lynch per ALJ-357 = \$600 2019: POC requested an hourly rate for Ms. Lynch equal to the 2018 requested rate + 2.35% COLA = \$614</p> <p>Both hourly rates are pending decision in proceeding R.16-02-007 on an intervenor compensation claim that POC filed on June 28, 2019.</p> <p>2020: \$614 + COLA to be added for 2020 when COLA is issued.</p>
Comment #2	<p>Basis for rate: D.19-04-031 established a rate of \$258 for 2018, POC requested a 5% step increase for Mr. Powers for 2018 which is \$271 for 2018. For 2019, POC requests the 2.35% COLA adjustment per ALJ-357, plus second 5% step increase.</p> <p>2018: \$258 + 5% step increase = \$271 2019: \$271 + COLA = 278 + 5% step increase = \$291.</p> <p>Both hourly rates are pending decision in proceeding R.16-02-007 on an intervenor compensation claim that POC filed on June 28, 2019. The step increases are authorized by D.07-01-009.</p> <p>2020: \$291 + COLA to be added for 2020 when COLA is issued.</p>
Comment #3	<p>Basis for rate: 2018: POC requested an hourly rate for Mr. Siegele per ALJ-357 = \$260 2019: POC requested an hourly rate for Mr. Siegele equal to the 2018 requested rate + 2.35% COLA = \$266</p> <p>Both hourly rates are pending decision in proceeding R.16-02-007 on an intervenor compensation claim that POC filed on June 28, 2019.</p> <p>2020: \$266 + 5% step increase = \$280 (rounded to nearest \$5) + COLA to be added for 2020 when COLA is issued.</p>

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] 2020 Rate for Loretta Lynch	D.21-03-039 approved a 2019 rate of \$615 for Lynch. We apply the 2020 COLA of 2.55% (Resolution ALJ-387) to Lynch's 2019 rate for a 2020 rate of \$630, when rounded to the nearest \$5.

Item	Reason
[2] 2019 Rate for Bill Powers	D.21-03-039 approved a 2019 rate of \$290 for Powers.
[3] 2020 Rate for Bill Powers	We apply the 2020 COLA of 2.55% (Resolution ALJ-387) to the 2019 rate of \$290 for a 2020 rate of \$295, when rounded to the nearest \$5.
[4] 2019 Rate for Tyson Siegele	D.21-03-039 approved a 2019 of \$270 for Siegele.
[5] 2020 Rate for Tyson Siegele	Siegele requests a 5% step increase to be added to his 2019 rate of \$270 (set in D.21-03-039). We apply the step increase and the 2020 COLA of 2.55%, per Resolution ALJ-387, for a 2020 rate of \$290.
[6] Lynch hours reduction 2020	Lynch's timesheets record 0.25 hours for "review revs to IRP PD & emails w/ team" (3/25/20). This timesheet entry is vague and does not relate to POC's claimed contribution. Therefore, it is not compensable.
[7] Powers Hours Reduction 2019	Powers' timesheets record 0.5 hours for "project management" (12/31/19) and 0.5 hours for "read comments of parties on RPD" (10/31/19). These tasks are vague and do not relate to POC's claimed contribution. Therefore, it is not compensable.
[8] Powers Hours Reduction 2020	Powers' timesheet records 0.5 hours for "project management." (3/13/20). This timesheet entry is vague and does not relate to POC's claimed contribution. Therefore, it is not compensable.
[9] Siegele Hours Reduction 2019	Siegele and Powers spent a total of 48 hours reviewing RSP (Reference System Plan) documents and drafting comments. We particularly note that on December 14, 2019, Siegele spent a total of 11.5 hours; on December 15, 2019, he spent a total of 15 hours; and on December 16, 2019, Siegele spent 10.5 hours reviewing and drafting comments. We find this excessive given POC's contribution. As such, we disallow 4 hours from Siegele for excessiveness.
[10] Siegele Hours Reduction 2020	<p>Lynch and Siegele spent a total of 45.75 hours on reviewing parties' comments, researching for reply comments, and drafting their January 6, 2020 reply comments. We find this excessive as POC's reply comments were 17 pages. We particularly note that on January 4, 2020, Siegele spent a total of 12.5 hours and on January 6, 2020, he spent another 11.5 hours on the review and research for the reply comments. As such, we disallow 4 hours from Siegele for excessiveness.</p> <p>Lynch, Powers, and Siegele spent a total of 51.75 hours reviewing and preparing their March 12, 2020 comments. We find this excessive as POC's comments were 15 pages. Of the 51.75 hours, 35 hours were completed by Siegele. We particularly note that on March 10, 2020, Siegele spent a total of 12.5 hours and on March 11, 2020, he spent</p>

Item	Reason
	<p>another 17 hours drafting comments. As such, we disallow 4 hours from Siegele for excessiveness.</p> <p>Siegele’s timesheet records 1 hour for “Review/Skim IRP RSP PD reply comments” (3/19/20). Reviewing other parties’ comments do not contribute to POC’s claimed contribution therefore it is not compensable.</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 (<i>see</i> Rule 14.6(c)(6))?	Yes

FINDINGS OF FACT

1. The Protect Our Communities Foundation has made a substantial contribution to D.20-03-028.
2. The requested hourly rates for The Protect Our Communities Foundation’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 \$52,007.50.

CONCLUSION OF LAW

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

ORDER

1. The Protect Our Communities Foundation shall be awarded \$52,007.50.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company, shall pay

The Protect Our Communities Foundation their respective shares of the award, based on their California-jurisdictional electric revenues for the 2020 calendar year, to reflect the year in which the proceeding was primarily litigated. If such data is unavailable, the most recent electric revenue data shall be used. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning August 19, 2020, the 75th day after the filing of Protect Our Communities Foundation'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 January 13, 2022, at San Francisco, California.

ALICE REYNOLDS
President
CLIFFORD RECHTSCHAFFEN
GENEVIEVE SHIROMA
DARCIE HOUCK
Commissioners

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:	D2201008	Modifies Decision?	No
Contribution Decision(s):	D2003028		
Proceeding(s):	R1602007		
Author:	ALJ Fitch		
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/ Disallowance
Protect Our Communities Foundation	June 5, 2020	\$56,162.00	\$52,007.50	N/A	See CPUC Comments, Disallowances, and Adjustments section above.

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Loretta	Lynch	Attorney	\$614	2020	\$630
Bill	Powers	Expert	\$291	2019	\$290
Bill	Powers	Expert	\$291	2020	\$295
Tyson	Siegele	Expert	\$266	2019	\$270
Tyson	Siegele	Expert	\$280	2020	\$290

(END OF APPENDIX)