

Decision 22-01-017 January 13, 2022

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Forward Resource Adequacy Procurement Obligations.

Rulemaking 19-11-009

**DECISION GRANTING COMPENSATION TO
PROTECT OUR COMMUNITIES FOUNDATION
FOR SUBSTANTIAL CONTRIBUTION TO DECISION 20-12-006**

Intervenor: Protect Our Communities Foundation	For contribution to Decision (D.) 20-12-006
Claimed: \$23,700	Awarded: \$19,841.00
Assigned Commissioner: Marybel Batjer ¹	Assigned ALJ: Debbie Chiv and Amin Nojan ²

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	Decision 20-12-006 adopts a local capacity requirement reduction compensation mechanism and the central procurement entity's competitive neutrality rules, among other issues scoped as Track 3.A of the proceeding.
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¹ Assigned Commissioner reassigned from Liane Randolph to President Batjer on February 26, 2021.

² Administrative Law Judge Amin Nojan co-assigned on January 26, 2021.

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:³

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	12/16/2019	Verified
2. Other specified date for NOI:	N/A	N/A
3. Date NOI filed:	1/15/2020	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.18-12-005	Verified
6. Date of ALJ ruling:	4/17/2019	Verified
7. Based on another CPUC determination (specify):	D.20-04-021; D.20-04-017; D.19-12-017.	Verified
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
11. Based on another CPUC determination (specify):	D.20-04-021; D.20-04-017; D.19-12-017.	Verified
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.20-12-006	Verified
14. Date of issuance of Final Order or Decision:	12/4/2020	Verified
15. File date of compensation request:	2/2/2021	Verified
16. Was the request for compensation timely?		Yes

³ All statutory references are to California Public Utilities Code unless indicated otherwise.

#	Intervenor’s Comment(s)	CPUC Discussion
	<p>PCF has no direct economic interest in the outcomes of these proceedings.</p> <p>PCF has previously met and continues to meet the Commission’s definitions of eligibility for intervenor compensation and financial hardship as shown in the decisions listed here:</p> <p>A.15-09-010, D.20-04-021 (April 16, 2020); R.18-12-005, D.20-04-017 (April 16, 2020); A.15-09-010, D.19-12-017 (December 5, 2019); A.12-10-009, D.19.10-047 (October 24, 2019); A.15-09-010, D.19-05-035 (May 30, 2019); A.15-09-013, D.19-04-031 (April 25, 2019); R.16-02-007, D.18-09-039 (September 27, 2018); A.15-09-010, D.18-07-034 (July 26, 2018)</p>	<p>Noted</p>
<p>B.9-12</p>	<p>Per Pub. Util. Code § 1804(b), a “finding of significant financial hardship shall create a rebuttable presumption of eligibility for compensation in other commission proceedings commencing within one year of the date of that finding.” D.20-12-006 was first published on the Commission’s website and served on the service list in R.19-11-009 on December 3, 2020, which is within one year of D.20-04-021 (April 16, 2020), D.20-04-017 (April 16, 2020), and D.19-12-017 (December 5, 2019). PCF is presumed eligible for intervenor compensation because this proceeding was commenced within one year of the findings of significant hardship in the proceedings identified in Part I.B.11. Pub. Util. Code, § 1804, subd. (b)(1).</p> <p>Additionally, PCF continues to meet the Commission’s longstanding definition of significant financial hardship. The economic interest of the individual members of PCF “is small in comparison to the costs of effective participation in the proceeding.” Pub. Util. Code, § 1802, subd. (h). PCF is a</p>	<p>Noted</p>

#	Intervenor’s Comment(s)	CPUC Discussion
	<p>nonprofit public benefit corporation organized exclusively for charitable, educational and public purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code. PCF represents the interests of a specific constituency: San Diego and other Southern California area residential utility ratepayers, the majority of whom do not have the financial ability to represent themselves in this proceeding, and whose interests are often not adequately represented in Commission proceedings. PCF certifies that the economic interest in this proceeding of any individual PCF constituents is small compared to the cost of effective participation in this proceeding.</p> <p>Moreover, as discussed above in comment B.5-8 in Section I.C., the Commission has repeatedly determined that PCF’s participation without an award of intervenor compensation imposes a significant financial hardship, and PCF circumstances have not changed in any relevant respect since such determinations were made. Pub. Util. Code, § 1803, subd. (b).</p>	<p>Noted</p>

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 1: LCR/reliability criteria</u></p> <p>PCF supported an extended schedule to further assess reliability criteria:</p> <p>“PCF supports the extended timeline proposed by the Energy Division because of the significant amount of work needed to assess all applicable reliability criteria and to review and finalize recommendations regarding the</p>	<p><u>Issue 1: LCR/reliability criteria</u></p> <p>The Commission agreed with PCF and ordered the LCR Working Group to continue discussions on the assessment of reliability criteria:</p> <p>“PCF support(s) the proposed schedule... The Commission agrees that additional time is warranted for the Working Group to evaluate the CAISO’s LCR</p>	<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>CAISO’s reliability criteria.” (PCF Comments on Track 3.A Working Group Reports, p. 10)</p> <p>“PCF agrees with SCE and SDG&E who supported the Energy Division’s proposal to revise and extend the schedule for the LCR working group. The new schedule should be adopted by the Commission.” (PCF Reply Comments on Track 3.A Working Group Reports, p. 5)</p> <p>“Thus, PCF agrees with the Energy Division’s recommended schedule for an extended review process and recommends an extensive review of CAISO reliability standards.” (PCF Reply Comments on Track 3.A Working Group Reports, p. 8)</p>	<p>reliability criteria and recommend necessary improvements. As such, the LCR Working Group should continue to discuss recommendations.” (D.20-12-006, p. 7)</p>	
<p>PCF opposed parties that claimed that the Commission should cancel the review of the CAISO reliability criteria. See sections III(A) and III(B) including:</p> <p>“[T]he Commission possesses separate and distinct statutory responsibilities to protect ratepayers, assure adequate electric service and to ensure just and reasonable rates, among a multitude of other statutory mandates contained in the Public Utilities Code. To fulfill its separate and distinct statutory duties, the Commission should review the reliability criteria of the CAISO, determine where the CAISO has added unjustifiable layers of</p>	<p>The Commission agreed with PCF’s recommendations:</p> <p>“[T]he LCR Working Group should continue to discuss recommendations and a draft Working Group Report and/or proposals shall be submitted into this proceeding by January 22, 2021.” (D.20-12-006, p. 7)</p>	<p>Verified, however, we disallow as PCF’s comments did not substantially contribute to the decision’s outcome.</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>conservatism on top of WECC and NERC standards, and decide whether changes should be made to the CAISO standards as a result.” (PCF Reply Comments on Track 3.A Working Group Reports, pp. 5-8)</p>		
<p><u>Issue 2: Competitive Neutrality</u></p>	<p><u>Issue 2: Competitive Neutrality</u></p>	<p>Noted</p>
<p>PCF opposed the recommendation that SCE’s rule would not apply to new generation solicitations:</p> <p>“PCF agrees with CalCCA and (MRP) that the Commission should reject SCE’s exclusion for new resources because the CPE staff through its work on CPE resource bid evaluations would have gained knowledge of confidential information.” (PCF Reply Comments on Track 3.A Working Group Reports, p. 4)</p> <p>“The Commission should...reject SCE’s proposed exclusion of competitive neutrality for new generation procurement” (PCF Reply comments on Track 3.A Working Group Reports, p. 5)</p>	<p>The Commission agreed with PCF’s opposition and adopted language that accommodates its’ recommendations:</p> <p>“PCF oppose(s) the recommendation that SCE’s rule would not apply to new generation solicitations.” (D.20-12-006, p. 30)</p> <p>“SCE responds that it agrees to allow the proposed rules to apply to new generation procurement... The Commission agrees with SCE that while it is unlikely that the CPE will engage in significant new generation procurement, if the CPE does so, SCE’s competitive neutrality rules should apply, except where SCE is mandated to procure new local generation on behalf of all benefitting customers.” (D.20-12-006, p. 31)</p>	<p>Verified</p>
<p><u>Issue 3: LCR RCM</u></p>	<p><u>Issue 3: LCR RCM</u></p>	<p>Noted</p>
<p>PCF advocated that CalCCA’s option #2 should be adopted by the Commission:</p>	<p>The Commission adopted CalCCA’s option #2 as recommended by PCF:</p>	

<p>Intervenor’s Claimed Contribution(s)</p>	<p>Specific References to Intervenor’s Claimed Contribution(s)</p>	<p>CPUC Discussion</p>
<p>“PCF agrees with CalCCA’s characterization of CalCCA option #2 proposal that the proposal would ‘allow for full transparency of the predetermined price.’ The CalCCA proposal also provides administrative simplicity. Each of these superior attributes of CalCCA option #2 demonstrate that it should be adopted by the Commission.” (PCF Comments on Track 3.A Working Group Reports, p. 4)</p>	<p>“Several parties support CalCCA’s Option 2 proposal with modifications, such as... PCF.” (D.20-12-006, p. 13).</p> <p>“PCF states that CalCCA offers the most complete proposal but recommends modifications, such as adding a premium for prioritized resources.” (D.20-12-006, p. 14)</p> <p>“Of the Working Group proposals for an LCR RCM, CalCCA’s Option 2 appears to best address the objectives outlined in D.20-06-002...Option 2 offers a transparent, pre-determined premium calculation that potentially reflects the cost to ratepayers and compensates LSEs for investing in preferred resources close to load, rather than extending market power premiums to LSEs.” (D.20-12-006, p.17).</p>	<p>Verified, however, we disallow without prejudice. We note that referencing one’s own comments within the decision as a primary source of claimed substantial contribution is discouraged.</p> <p>Verified</p>
<p>PCF provided additional support that amplified the reasons to adopt CalCCA’s Option 2 proposal and recommended improvements to the proposal. (PCF Comments on Track 3.A Working Group Reports, pp. 3-8.)</p>	<p>“PCF states that CalCCA offers the most complete proposal but recommends modifications, such as adding a premium for prioritized resources.” (D.20-12-006, p. 14)</p>	<p>Verified</p>
<p>PCF recommended CPE resource selection meet the following standards in a quantitative manner:</p> <p>“The CPE must prioritize resources using clear, fair, and identical rules. Some discussion by parties</p>	<p>The Commission agreed with PCF’s position that the CPE must use clear transparent, and quantitative rules for selecting resources:</p>	<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>recommended that the CPE be allowed to use both quantitative and qualitative measures for resource selection. PCF urges the Commission to use exclusively quantitative rules because relying on the facts, and not subjective factors, will result in a clear and administratively simple evaluation mechanism which does not change regardless of CPE administrator or the resource being evaluated. On the other hand, qualitative rules would allow the CPE to change the values of resources arbitrarily because qualitative rules inherently involve judgement calls.” (PCF Comments on Track 3.A Working Group Reports, p. 5)</p>	<p>“The CPE shall apply all of the methodology and criteria set forth in Ordering Paragraph 14 of D.20-06-002 to shown resources in the same way the methodology and criteria are applied to bid resources.” (D.20-12-006, p. 23).</p>	
<p>PCF recommended resource values remain constant over the bid timeline:</p> <p>“The Commission should reject proposed annual adjustments to local compensation. (Issue 5) PFC agrees with CalCCA that resource values should remain constant over the three-year bid timeline.” (PCF Comments on Track 3.A Working Group Reports, p. 8)</p>	<p>The Commission rejected annual adjustments in line with PCF’s recommendation:</p> <p>“If selected, the LSE shall be paid the showing price (pre-determined price or below) without annual adjustment for effectiveness.” (D.20-12-006, p. 23).</p>	<p>Verified</p>
<p>PCF opposed unlimited legacy treatment of resources including UOG:</p> <p>“PCF agrees with PG&E, SCE, and CalCCA that existing contracts should not retain special privileges</p>	<p>In alignment with PCF’s recommendations. The Commission rejected legacy treatment for gas resources including UOG:</p>	<p>Verified. We disallow, as PCF’s comments largely restated other parties’ comments and did not substantially</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
indefinitely. Further, PCF also agrees with CalCCA that utility owned generation (UOG) should not be viewed as an existing contract.” (PCF Comments on Track 3.A Working Group Reports, p. 9)	“For these reasons, we conclude that applying legacy treatment to a large amount of existing gas resources was not intended and undermines the hybrid procurement framework. Accordingly, we decline to grant legacy treatment for existing fossil resources.” (D.20-12-006, p. 26)	contribute to the decision’s outcome.
PCF supported the CPE’s right to accept or reject resources: “PFC agrees with the Public Advocates Office (Cal Advocates) that only resources that provide value should be provided compensation. Ratepayers should not be required to pay for power resources that provide no value to them or that cannot be used when needed.” (PCF Comments on Track 3.A Working Group Reports, p. 4)	The Commission adopted rules in alignment with PCF’s recommendation on resource selection/rejection: “The CPE may accept or reject the shown local resource if more cost-effective resources are available.” (D.20-12-006, p. 23)	Verified. We disallow, as PCF’s comments largely restated other parties’ comments and did not substantially contribute to the decision’s outcome.

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?⁴	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: SCE, SDG&E, PG&E, AR&M, MRP, CalCCA		Noted

⁴ 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>d. Intervenor’s claim of non-duplication:</p> <p>To the extent PCF’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. PCF submitted data requests to CAISO and SCE to gather relevant data to inform its’ contributions. PCF’s extensive research and analyses provided unique material to inform the Commission throughout the determination of this Decision.</p> <p>Where PCF’s position aligned with other parties’ positions, PCF performed and submitted additional technical analysis, provided more data and source information, and finally made recommendations for ways to strengthen proposals.</p> <p>The interests PCF represents are not otherwise adequately represented at the Commission; no other party has the same perspective, background, and experience as PCF on issues relevant to the determination of this Decision or has focused on the San Diego region. PCF’s comments were necessary for a fair determination of D.20-12-006 because they enriched the Commission’s deliberations and substantially contributed to the Decision’s findings regarding the reliability criteria schedule, maintaining competitive neutrality, and the LCR RCM as noted in Part II (A) above.</p>		Noted

C. Additional Comments on Part II:

#	Intervenor’s Comment	CPUC Discussion
II(A)	<p>Substantial Contribution.</p> <p>Pursuant to Section 1802(j), “Substantial contribution” means that, in the judgment of the commission, the customer’s presentation has substantially assisted the commission in the making of its order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer.”</p>	Noted
II(A)	<p>Substantial Contribution Includes Enriching Deliberations and the Record.</p>	Noted

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion								
<p>a. Intervenor’s claim of cost reasonableness:</p> <p>PCF’s advocacy reflected in this request for compensation substantially contributed to a decision that will impact California ratepayers and the public at large in terms of reliability and LCRs. PCF comments provided meaningful insight that supported both CalCCA’s LCR RCM and the need more time to ensure a thorough assessment of all reliability criteria was conducted at the CAISO. PCF provided legal, historical, and technical citations to make informed recommendations on fair and transparent CPE procurement methodologies, reliability criteria, and operational neutrality measures that made a substantial contribution and informed the Commission’s decision-making.</p>	Noted								
<p>b. Reasonableness of hours claimed:</p> <p>Energy Analyst Tyson Siegele efficiently prepared comments that avoided redundancy and identified factual inaccuracies in comments and proposals filed by other parties. PCF’s hours expended are reasonable and the total amount is substantially lower than if PCF had used an outside attorney or expert. PCF’s energy analyst’s work on related issues in Commission proceedings significantly reduced the hours that would have otherwise been necessary. PCF is not claiming any time spent on administrative matters, such as time spent filing and serving comments. PCF is claiming only minimal time expended by PCF’s board members in developing information or reviewing comments. In an effort to keep costs low, PCF advocate Julia Severson, whose rate is significantly lower than that of Mr. Siegele’s, aided in preparing this request. All of the hours claimed in this request were reasonably necessary to PCF’s participation in the determination of the decision.</p>	Noted								
<p>c. Allocation of hours by issue:</p> <p>Based on the detail in the time sheets, the approximate allocation of time spent towards D.20-12-006 is as follows:</p> <table border="1" data-bbox="203 1682 1096 1837"> <tbody> <tr> <td>10%</td> <td>Issue 1: LCR/reliability criteria</td> </tr> <tr> <td>20%</td> <td>Issue 2: Competitive Neutrality</td> </tr> <tr> <td>60%</td> <td>Issue 3: LCR RCM</td> </tr> <tr> <td>10%</td> <td>Issue 4: General Participation</td> </tr> </tbody> </table>	10%	Issue 1: LCR/reliability criteria	20%	Issue 2: Competitive Neutrality	60%	Issue 3: LCR RCM	10%	Issue 4: General Participation	Noted
10%	Issue 1: LCR/reliability criteria								
20%	Issue 2: Competitive Neutrality								
60%	Issue 3: LCR RCM								
10%	Issue 4: General Participation								

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Tyson Siegele	2020	77.25	\$280.00	See Comment #1.	\$21,630	67.7 [1][2] [3][6]	\$280.00	\$18,956.00
Bill Powers	2020	3	\$291.00	See Comment #2	\$873	3.0	\$295.00 [4]	\$885.00
Subtotal: \$22,503.00						Subtotal: \$19,841.00		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Julia Severson	2021	9	\$56.75	½ of hourly rate. See Comment # 3.	\$510.75	0.0 [5]	\$56.75	\$0.00
Tyson Siegele	2021	4.5	\$152.50	½ of hourly rate. See Comment #4.	\$686.25	0.0 [5]	\$152.50	\$0.00
Subtotal: \$1,197.00						Subtotal: \$0.00		
TOTAL REQUEST: \$23,700.00						TOTAL AWARD: \$19,841.00		
<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' 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 ⁵		Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation				

⁵ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

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

Attachment or Comment #	Description/Comment
Attachment #1	Certificate of Service
Attachment #2	Time Sheet and Categorization
Attachment #3	Tyson Siegele Resume
Attachment #4	Julia Severson Resume
Comment #1	<p>Tyson Siegele Basis for 2020 Rate: 2018: PCF requested an hourly rate for Mr. Siegele per ALJ-357 = \$260 2019: PCF requested an hourly rate for Mr. Siegele equal to the 2018 requested rate + 2.35% COLA = \$266 Both hourly rates are pending decision in proceeding R.16-02-007 on an intervenor compensation claim that PCF filed on June 28, 2019. 2020: \$266 + 5% step increase = \$280 (rounded to nearest \$5) + COLA to be added for 2020 when COLA is issued.</p>
Comment #2	<p>Bill Powers Basis for 2020 Rate: D.19-04-031 established a rate of \$258 for 2018, PCF requested a 5%step increase for Mr. Powers for 2018 which is \$271 for 2018. For 2019, PCF requests the 2.35% COLA adjustment per ALJ-357, plus second 5% step increase. 2018: \$258 + 5% step increase = \$271 2019: \$271 + COLA = 278 + 5% step increase = \$291 Both hourly rates are pending decision in proceeding R.16-02-007 on an intervenor compensation claim that PCF filed on June 28, 2019. 2020: \$291 + COLA to be added for 2020 when COLA is issued.</p>
Comment #3	<p>Julia Severson Basis for 2021 Rate: Per Resolution ALJ-393, PCF calculates new 2021 rates and justifies them herein. Based on the variety of work Ms. Severson completes at PCF, Ms. Severson is most accurately categorized as “Advocate – Not Otherwise Classified.” Level I of the 2021 rate calculations sets the experience timeline to 0-1 years. Level II sets the experience timeline to 2-5 years. Ms. Severson holds a bachelor’s degree and 1.5 years of experience in the legal field, which exceeds the experience of Level I. Based on her experience and Ms. Severson’s substantial and substantive responsibilities at PCF, PCF requests a 2021 rate of \$113.50, which is commensurate with the high-level rate for Level I. This rate is also the median rate for Paralegals with less than one year of experience. Ms. Severson has more than one year of experience assisting and supporting attorneys with research, which thus also supports Ms. Severson’s requested hourly rate for 2021.</p>
Comment #4	Tyson Siegele Basis for 2021 Rate:

Attachment or Comment #	Description/Comment
	<p>Per Resolution ALJ-393, PCF calculates new 2021 rates and justifies them herein. Based on the expert knowledge and experience Mr. Siegele provides to PCF, the organization categorizes his work as “Expert – Not Otherwise Classified.” Mr. Siegele has earned a number of licenses in his career: as an architect, general contractor, and Energy Star Builder. Of those certifications, Mr. Siegele continues to maintain his architecture license which supplements his expertise as an energy analyst by bringing to PCF an in depth understanding the intricate interactions between energy and the built environment. Additionally, Mr. Siegele spent the last 4 years as a leading voice in Southern California’s transition to electric transportation, first as the vice president, and subsequently as the president of the Electric Vehicle Association of San Diego. In recognition of his work as an electric vehicle expert and advocate, Mr. Siegele received the 2019 award “MVP of the Western U.S.” from the Electric Auto Association.</p> <p>Because of Mr. Siegele’s degree in architecture; licenses and certifications in architecture and contracting; leadership in electric transportation; and two decades of experience in energy and the built environment, PCF recommends that the Commission categorize Mr. Siegele as “Expert – Not Otherwise Classified,” “Level V,” and set his hourly rate at \$305, which corresponds to an hourly rate close to the median for his level of experience.</p>

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1]	Upon verification of submitted timesheets of Tyson Siegele, we disallow “review track 3A proposals and skim report for LCA Comp Mech, skim report on LCR criteria issues” for vague tasks, per D.10-02-010, and reduce 2020 hours by 1 hour.
[2]	Upon verification of submitted timesheets, we reduce the requested time by 0.5 hours associated with “RA – review D.20-06-031...” for work related to another decision. As these hours contribute to a previous decision in the same proceeding, we disallow the 0.5 hours associated with D.20-06-031.
[3]	Upon verification of substantial contributions, two claimed contributions regarding the Issue #3 LCR RCM were verified, but disallowed. We find these comments did not substantially contribute to the overall decision and therefore we disallow the time associated with the comments, noted in Part II.A CPUC Discussion.

Item	Reason
	<p>We reduce the hours associated with Issue #3 LCR RCM by 10%. Issue 3 accounts for 60% of the total hours and after the 1.5 hour reduction found above, brings Tyson Siegele’s 2020 hours to 75.75 hours. The time reduction is as follows:</p> <p>$77.25 - 1.5 = 75.75$ $75.75 \times 0.6 = 45.45 * .1 = 4.545$ $75.75 - 4.545 = 71.20$</p> <p>Approved 2020 Hours for Tyson Siegele are 71.20 hours.</p>
[4]	2020 Rate of \$295.00 for Bill Powers verified in D.21-08-018
[5]	<p>Submitted timesheets do not reflect time associated with Intervenor Compensation Claim Preparation for Tyson Siegele and Julie Severson. We reduce award time to zero, consistent with submitted timesheets.</p> <p>Though we do not award any hours for Intervenor Compensation Claim Preparation because of the lack of timesheet documentation, we did review and find the requested 2021 Rates for Julia Severson of \$113.50 and Tyson Siegele of \$305.00 reasonable.</p>
[6]	<p>Upon review of the submitted timesheets, 9/10/2020 contained 3.5 hours for “research Aug 14th blackouts for track 3A comments.” We disallow the entry for vague tasks and further reduce Tyson Siegele’s 2020 hours by 3.5 hours, bringing Tyson Siegele’s hours awarded to 67.7.</p> <p>Calculation: $71.2 - 3.5 = 67.7$</p>

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

A. Opposition: Did any party oppose the Claim?	No
B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?	Yes

FINDINGS OF FACT

1. Protect Our Communities Foundation has made a substantial contribution to D.20-12-006.
2. The requested hourly rates for 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 are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$19,841.00.

CONCLUSION OF LAW

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

ORDER

1. Protect Our Communities Foundation shall be awarded \$19,841.00.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company shall pay 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 April 18, 2021 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:	D2201017	Modifies Decision?	No
Contribution Decision(s):	D2012006		
Proceeding(s):	R1911009		
Author:	ALJ Chiv and ALJ Nojan		
Payer(s):	Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas & Electric Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/ Disallowance
Protect Our Communities Foundation	02/02/2021	\$23,700	\$19,841.00	N/A	<i>See CPUC Comments, Disallowances and Adjustments.</i>

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Tyson	Siegele	Expert	\$280	2020	\$280.00
Bill	Powers	Expert	\$291	2020	\$295.00
Tyson	Siegele	Expert – Not Otherwise Classified	\$305	2021	\$305.00
Julia	Severson	Advocate – Not Otherwise Classified	\$113.50	2021	\$113.50

(END OF APPENDIX)