

Decision 22-02-024 February 24, 2022

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Evaluating the Commission’s 2010 Water Action Plan Objective of Achieving Consistency between Class A Water Utilities’ Low-Income Rate Assistance Programs, Providing Rate Assistance to All Low – Income Customers of Investor-Owned Water Utilities, and Affordability.

Rulemaking 17-06-024

**DECISION GRANTING COMPENSATION TO
CENTER FOR ACCESSIBLE TECHNOLOGY
FOR SUBSTANTIAL CONTRIBUTION TO DECISION 20-08-047**

Intervenor: Center for Accessible Technology (CforAT)	For contribution to Decision (D.) 20-08-047
Claimed: \$52,345.52	Awarded: \$52,277.27
Assigned Commissioner: Darcie L. Houck ¹	Assigned ALJs: Camille Watts-Zagha and Robert Haga

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	This decision resolves Phase I issues in this proceeding. In addition to requiring water utilities to propose Monterey-Style Water Revenue Adjustment Mechanisms (WRAMs) in future general rate cases, the decision: (1) requires utilities to provide analyses in their next general rate cases to determine appropriate Tier 1 breakpoints, (2) directs utilities to adopt consistent terminology for their low-income rate assistance programs; (3) creates a pilot program to provide discounts to low-income tenants in multi-family
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¹ This proceeding was reassigned to Commissioner Houck from Commissioner Guzman Aceves on January 24, 2022.

	<p>dwellings that don't pay water bills directly to the utility; and (4) adopts standardized reporting requirements and information requirements for consolidation requests.</p>
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812²:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	September 11, 2017	Verified
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	September 22, 2017	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:	CforAT's most recent ruling re: eligibility/financial hardship issued in R.20-01-007 (Gas Planning)	Verified
6. Date of ALJ ruling:	5/29/20	Verified
7. Based on another CPUC determination (specify):	N/A	
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:	CforAT's most recent ruling re: eligibility/financial hardship was issued in R.20-01-007 (Gas Planning)	Verified
10. Date of ALJ ruling:	5/29/20	Verified
11. Based on another CPUC determination (specify):	N/A	
12. Has the Intervenor demonstrated significant financial hardship?		Yes

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

	Intervenor	CPUC Verification
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.20-08-047	Verified
14. Date of issuance of Final Order or Decision:	September 3, 2020	Verified
15. File date of compensation request:	November 2, 2020	10/23/2020
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>1. General/Overview:</p> <p>CforAT has been an active participant in this proceeding since it was first opened in order to address issues of concern to our constituency of water customers with disabilities, including the large number of low-income customers with disabilities. CforAT has worked in conjunction with other advocates as appropriate in order to efficiently advance the interests of our constituency.</p> <p>CforAT has submitted numerous sets of written comments, both alone and in conjunction with other advocates, as follows:</p> <ul style="list-style-type: none"> • Comments on OIR, filed on 8/21/17; • Comments on Phase 1 Issues, filed on 2/23/18; 	<p>CforAT’s specific contributions, as well as the Commission’s references to such contributions, are set forth in detail below.</p>	<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<ul style="list-style-type: none"> • Comments on Amended Scoping Memo, filed on 8/15/18, in conjunction with a broad coalition of water advocates; • Comments on ALJ Ruling (2019 Workshop Reports), filed on 7/10/19 in conjunction with the Pacific Institute; • Comments on ALJ Ruling, filed on 9/16/19; • Comments on PD, filed on 7/27/20. 		
<p>2. Low-Income Rate Assistance Programs:</p> <p>From the beginning of the proceeding and throughout Phase 1, CforAT supported standardization and expansion of the various low-income support programs offered by water utilities.</p> <ul style="list-style-type: none"> • Comments on OIR at pp. 9-10; • Comments on ALJ Ruling (2019 Workshop Reports) (with Pacific Institute) at pp. 8-11; • Comments on ALJ Ruling at pp. 9-10; • Comments on Phase 1 PD at pp. 2-3. <p>CforAT, in conjunction with various water advocates, also supported adoption of a pilot program to provide assistance to water users in</p>	<p>The Phase 1 Decision specifically noted certain contributions by CforAT, including the following:</p> <ul style="list-style-type: none"> • CforAT advocated for the creation of broad cost recovery with pooled funding as the most equitably and fair cost recovery option. Phase 1 Decision at p. 24. • CforAT supported the use of a uniform program name that is not LIRA. Phase 1 Decision at pp. 23-24. • CforAT supported a pilot program to explore ways to provide benefits to low-income tenants who do not pay a water bill directly. Phase 1 Decision at pp. 44-45. <p>After considering party input, the Phase 1 Decision took the following actions:</p> <ul style="list-style-type: none"> • Adopted a common name to aid outreach to customers and statewide coordination in the delivery of 	<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>multi-family housing who do not pay a water bill directly.</p> <ul style="list-style-type: none"> • Comments on OIR at pp. 10-11; • Comments on Amended Scoping Memo (with Joint Advocates) at pp. 9-10; • Comments on ALJ Ruling (2019 Workshop Reports) (with Pacific Institute) at p. 11; • Comments on ALJ Ruling at pp. 10-11; • Comments on Phase 1 PD at pp. 5-6. 	<p>assistance to low-income customers, to be formalized in each district’s next GRC Phase 1 Decision at pp. 77-80.</p> <ul style="list-style-type: none"> • Noted that further changes and standardization for low-income support programs will likely happen through a statewide process, consistent with the recommendations of the AB 401 Report. Phase 1 Decision at p. 79. <i>See also</i> Phase 1 Decision at p. 99 (addressing alignment with developments in statewide programs and processes). • Directed the creation of a pilot program to explore ways to provide a discount to water users in low-income multi-family housing, specifically noting agreement with CforAT and California Water Association that “small-scale pilot programs offer a good opportunity to test delivering benefits to low-income renters in multi-family buildings that do not pay a water bill directly.” Phase 1 Decision at pp. 80-81. 	
<p>3. Affordability and Rate Design:</p> <p>From the beginning of the proceeding and throughout Phase 1, CforAT supported rate designs that would provide for affordable allocations of water at the lowest possible rates for all users, including calculations of essential indoor usage (EIU), use of Tier 1 breakpoints to support affordability and other recommendations including adoption of a program</p>	<p>The Phase 1 Decision specifically noted certain contributions by CforAT, including the following:</p> <ul style="list-style-type: none"> • CforAT urged the Commission to focus the use of its rate design authority to support affordable access to necessary supplies of drinking water, including use of the tiered rate structure to ensure affordability of amounts of water sufficient to meet 	<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>modeled on Medical Baseline to allow for greater allocations for household with demonstrated need.</p> <ul style="list-style-type: none"> • Comments on OIR at pp. 3-9; • Comments on Phase 1 Issues at pp. 4-5; • Comments on Amended Scoping Memo (with Joint Advocates) at pp. 2-9; 13-15; • Comments on ALJ Ruling (2019 Workshop Reports) (with Pacific Institute) at pp. 3-7 and 12-14; • Comments on ALJ Ruling at pp. 3-9; • Comments on Phase 1 PD at pp. 3-5. 	<p>indoor essential usage. Phase 1 Decision at p. 24.</p> <ul style="list-style-type: none"> • CforAT advocated structuring discounts to provide essential supplies of water at reduced rates while allowing higher rates for water supplies that go beyond basic needs. Phase 1 Decision at p. 24. • CforAT, in conjunction with water advocates, addressed average usage and the need to ensure water affordability without sacrificing conservation goal. Phase 1 Decision at pp. 35-36. • CforAT addressed the need to set Tier 1 consumption and rates based on essential indoor usage that varies by service territory, in conjunction with a minimum baseline. CforAT also supported an opportunity for variances for customers who need more water. <p>After considering party input, the Phase 1 Decision acknowledges the need for a baseline amount to provide an appropriate minimum amount of water at an affordable rate, based on calculation of an EIU or other methodology that reflects necessary water for basic human needs. The Phase 1 Decision then directs the Water Utilities to provide analysis in their next GRCs to allow the Commission to set an appropriate Tier 1 Breakpoint. Phase 1 Decision at pp. 76-77.</p>	

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>4. Consolidation:</p> <p>From the beginning of the proceeding and throughout Phase 1, CforAT supported effective use of consolidation to support affordability and water quality. In order to support the consolidation process, CforAT supported streamlining for simple applications, but noted the need for more flexibility for complex applications.</p> <ul style="list-style-type: none"> • Comments on OIR at p. 12; • Comments on Phase 1 Issues at pp. 2-3; • Comments on Staff Report at p. 12. 	<p>The Phase 1 Decision specifically noted certain contributions by CforAT, including the following:</p> <ul style="list-style-type: none"> • CforAT supported effort to promote consolidation of water systems to improve water quality and address affordability. Phase 1 Decision at p. 24. • CforAT supported use of individualized schedules in consolidation proceeding if the request raises new or complex issues. Phase 1 Decision at p. 48. <p>After considering party input, the Phase 1 Decision provided guidance for water consolidation timelines, including certain data requirements to be included with consolidation applications. Phase 1 Decision at pp. 87-93.</p>	<p>Verified</p>
<p>5. Other issues:</p> <ul style="list-style-type: none"> • CforAT was not actively involved in issues focused on forecasting and use of a WRAM versus a Monterey-Style WRAM, but touched on them in passing in various filings: • In early filings, CforAT touched on issues that were not eventually given detailed consideration, such as potential assertion of jurisdiction over water bottlers; • CforAT made additional recommendations on issues such as matters of water quality, use of metrics to evaluate the 		<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
effectiveness of low-income programs, and other matters.		
<p>6. Phase 2:</p> <p>On June 2, 2020, the Commission issued a Second Amended Scoping Memo in this proceeding establishing a separate phase to address a potential Commission response to the ongoing COVID-19 pandemic. CforAT is not seeking compensation for any time spend on Phase 2 issues at this time, but we anticipate that we will submit a further request for compensation after the Commission issues a decision addressing issues raised in the COVID Phase of this proceeding.</p>		Noted

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
<p>c. If so, provide name of other parties:</p> <p>Pacific Institute, Community Water Center, Natural Resources Defense Council; Leadership Council for Justice and Affordability, Cal Advocates (on some issues, though CforAT did not address issues of forecasting /WRAM structure, which were given considerable attention by Cal Advocates)</p>		Verified

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>d. Intervenor’s claim of non-duplication:</p> <p>CforAT coordinated with other water advocates throughout this proceeding. CforAT prepared a joint filing with Pacific Institute and another joint filing with a larger group of water advocates including Pacific Institute; Natural Resources Defense Council; The Environmental Justice Coalition for Water; Community Water Center; and Leadership Counsel for Justice and Accountability Even where the water advocates did not file jointly, CforAT coordinated with the other advocates to avoid duplication of effort.</p> <p>For the joint filings, the advocates divided tasks in order to work efficiently. As the party with the most experience advocating before the Commission, CforAT took the lead on the procedural elements of the joint filings, as well as completing assigned portions of the overall drafting.</p> <p>To the extent that there was any modest duplication of effort in the various filings that took place over a period of years, it does not reach the level where CforAT’s compensation should be reduced.</p>		<p>Noted</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>This proceeding advances the Commission’s ongoing work to support affordability of essential supplies of water for all customers of water utilities within its jurisdiction, including guidance for ongoing modifications of rate design to support affordability for all customers and steps to support standardization of support programs for low-income customers. The Phase 1 Decision also provides guidance on consolidation of water districts, which will help advance affordability and water quality.</p> <p>While these steps do not have a direct impact on water district customers with disabilities (many of whom are low income), the ongoing steps initiated in this proceeding will help support water affordability and quality for all customers. While the direct benefits of the Phase 1 Decision cannot be quantified with a dollar value, the overall benefit to CforAT’s constituency as the requirements</p>	<p>Noted</p>

	CPUC Discussion
<p>and guidance included in the Decision are implemented can reasonably be expected to exceed the cost of CforAT’s participation.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>CforAT worked efficiently and effectively in this proceeding, including delegation of substantial work to a junior attorney (first Michael Iseri, then Adrian Slipski) with a lower billing rates than the Legal Director. While the junior attorney may have been (as would be expected) less efficient in performing certain tasks than CforAT’s experienced Legal Director, this form of delegation and supervision results in reasonable overall efficiency and cost. Time spent delegating and overseeing work is efficient and necessary, and still results in lower overall cost than would be the case without such delegation of responsibility.</p> <p>In our NOI, CforAT estimated that this proceeding would involve 60 hours of work from our Legal Director and 120 hours of work from a junior attorney. This claim seeks compensation for slightly more hours from the Legal Director (under 70), and substantially fewer hours for work by two different junior attorneys (slightly over 70).</p>	Noted
<p>c. Allocation of hours by issue:</p> <p style="text-align: center;">2017 Time – Kasnitz (Total Hours: 14.6)</p> <p>General Participation: 7.6 Hours (52%) The issue area “General Participation” includes review of materials on forecasting and other issues where CforAT was not actively involved, as well as time spent on procedural issues and issues that have not yet been fully resolved, such as the scope of the Commission’s jurisdiction over water bottlers.</p> <p>Consolidation: 0.2 Hours (1%) The issue area “Consolidation” includes work spent on issues of consolidation of utility districts.</p> <p>LIRA: 0.3 Hours (2%) The issue area “LIRA” addresses issues regarding low-income water subsidy programs and options, including efforts to increase uniformity of water subsidy programs, potential pooling of support for such programs, and the development of a pilot program for renters who do not pay a water bill directly.</p> <p>Mix: 6.5 Hours (45%)</p>	Noted

	CPUC Discussion
<p>The issues area “Mix” is used for time spent on matters where more than one substantive issue is addressed, including most sets of written comments. While not every set of written comments addressed all issues included in Mix, CforAT provides the following estimate of the overall breakdown of time allocated to Mix: Affordability/Rate Design: 45%; LIRA Program: 40%; Consolidation: 7.5%; Other minor issues (such as data collection): 7.5%.</p> <p style="text-align: center;">2017 Time – Iseri (Total Hours: 15.5)</p> <p>General Participation: 9.4 Hours (61%)</p> <p>Consolidation: 6.1 Hours (39%)</p> <p style="text-align: center;">2018 Time – Kasnitz (Total Hours: 14.0)</p> <p>General Participation: 6.1 Hours (44%)</p> <p>Affordability/Rate Design: 0.9 Hours (6%) The issue area “Affordability/Rate Design” includes time spent on issues of water affordability for all customers, not based on a low-income subsidy program. This issue area includes work on calculations of essential indoor usage, fixed charges and tiered rate structural issues, including the breakpoint for Tier 1.</p> <p>Mix: 7.0 Hours (50%)</p> <p style="text-align: center;">2018 Time – Iseri (Total Hours: 6.8)</p> <p>General Participation: 1.9 Hours (28%)</p> <p>Mix: 4.9 Hours (72%)</p> <p style="text-align: center;">2018 Time – Slipski (Total Hours: 1.8)</p> <p>General Participation: 1.8 Hours (100%)</p> <p style="text-align: center;">2019 Time – Kasnitz (Total Hours: 27.9)</p> <p>General Participation: 4.5 Hours (16%)</p> <p>Affordability/Rate Design: 7.2 Hours (26%)</p> <p>Consolidation: 0.2 Hours (<1%)</p>	

	CPUC Discussion
<p>LIRA 3.9 Hours (14%)</p> <p>Mix: 12.1 Hours (43%)</p> <p style="padding-left: 40px;">2019 Time – Slipski, Pre-Admission (Total Hours: 10.1)</p> <p>General Participation: 8.6 (85%)</p> <p>Affordability/Rate Design: 0.3 Hours (3%)</p> <p>LIRA: 1.2 Hours (12%)</p> <p style="padding-left: 40px;">2019 Time – Slipski, Post-Admission (Total Hours: 36.9)</p> <p>General Participation: 4.8 Hours (13%)</p> <p>Affordability/Rate Design: 6.5 Hours (18%)</p> <p>Mix: 25.6 Hours (69%)</p> <p style="padding-left: 40px;">2020 Time – Kasnitz (Total Hours: 13.1)</p> <p>General Participation: 0.4 Hours (3%)</p> <p>Affordability: 0.4 Hours (3%)</p> <p>PD: 12.3 Hours (94%)</p> <p>The issue area “PD” includes time spent following the release of the Proposed Decision, which addressed the substantive areas of affordability/rate design, the LIRA (or CAP) program, and consolidation, as well as additional issues such as forecasting/WRAM, which CforAT did not substantively address.</p>	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Melissa W. Kasnitz	2020	13.1	\$500.00	Applying Resolution ALJ-387 to 2019 Rate. See note below.	\$6,550.00	13.10	\$495.00 [1]	\$6,484.50

CLAIMED						CPUC AWARD		
Melissa W. Kasnitz	2019	27.9	\$485.00	D.20-06-043	\$13,531.50	27.90	\$485.00	\$13,531.50
Melissa W. Kasnitz	2018	14.0	\$475.00	D.18-11-049	\$6,650.00	14.00	\$475.00	\$6,650.00
Melissa W. Kasnitz	2017	14.6	\$465.00	D.17-11-03	\$6,789.00	14.60	\$465.00	\$6,789.00
Michael Iseri	2018	6.8	\$215.00	D.19-09-016	\$1,428.00 [2]	6.80	\$215.00	\$1,462.00
Michael Iseri	2017	15.5	\$210.00	D.17-11-031	\$3,255.00	15.50	\$210.00	\$3,255.00
Adrian Slipski	2019 (pre-Bar)	10.1	\$190.00	D.20-06-046	\$1919.00	10.10	\$190.00	\$1,919.00
Adrian Slipski	2019 (post-Bar)	37.1	\$210.00	D.20-05-035	\$7,749.00 [2]	36.90 [3]	\$210.00	\$7,749.00
Adrian Slipski	2018	1.8	\$190.00	D.20-06-046	\$342.00	1.80	\$190.00	\$342.00
Subtotal: \$48,213.50						Subtotal: \$48,182.00		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Mike Iseri	2017	1.9	\$105.00	½ Standard Rate	\$199.50	1.90	\$105.00	\$199.50
Melissa Kasnitz	2017	0.6	\$232.50	½ Standard Rate	\$139.50	0.60	\$232.50	\$139.50
Melissa Kasnitz	2020	14.7	\$250.00	½ Requested Rate	\$3,675.00	14.70	\$247.50 [1]	\$3,638.25
Subtotal: \$4,014.00						Subtotal: \$3,977.25		
COSTS								
#	Item	Detail			Amount	Amount		
1.	Train Tickets	9/11/2017 Sacramento hearing (R/T for Iseri & Kasnitz)			108.00	\$108.00		
2.	Postage	Sending copies of filings to Commissioners and ALJ			10.02	\$10.02		
Subtotal: \$118.02						Subtotal: \$118.02		

CLAIMED		CPUC AWARD	
TOTAL REQUEST: \$52,345.52		TOTAL AWARD: \$52,277.27	
<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 ⁴	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Melissa W. Kasnitz	December, 1992	162679	No
Adrian Slipski	June 3, 2019	325910	No
Michael Iseri	June, 2014	307607	No

C. Attachments Documenting Specific Claim and Comments on Part III: (Intervenor completes; attachments not attached to final Decision)

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Detailed Time Records (including Merits and time on compensation)
3	Receipt for train tickets
Comment	Kasnitz Rate: In 2019, the Commission initially improved an annual hourly rate for Melissa Kasnitz of \$490 (D.19-12-053), but subsequently reset her rate to \$485 (D.20-06-043). CforAT has previously requested reconsideration of the decision to reset the rate to the lower level. However, applying the 2020 COLA to either of these rates results in the same rate of \$500 for 2020.

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

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1]	<p>Adopting \$495.00 rate for 2020. New rate based on Kasnitz’s 2019 rate adjusted to reflect Resolution ALJ-387 (2.55% COLA) and accurate calculations.</p> <p>Using D.18-11-049 as the basis for the 2018 rate of \$475, the following calculations reflect the accurate 2019 and 2020 rate for Melissa Kasnitz: 2018 - \$475 2019 - \$475 x 2.35% 2019 COLA = 11.16 + \$475 = \$486.16 (Rounded to nearest \$5) = \$485 2020 - \$485 x 2.55% 2020 COLA = 12.37 + \$485 = \$497.36 (Rounded to nearest \$5) = \$495</p> <p>Upon further review, D.20-06-043 correctly reflected the 2019 rate of \$485.00. Per D.08-04-010 (rounding to nearest \$5 increment) and Resolution ALJ-387 (2.55% 2020 COLA), the correct 2020 rate for Melissa Kasnitz is \$495.00, shown in the calculations above.</p>
[2]	<p>Arithmetic error:</p> <p>Michael Iseri 2018 requested rate total was \$1,428.00. Correct total is \$1,462.00.</p> <p>Adrian Slipski 2019 requested rate total was \$7,749.00. Correct total is \$7,791.00.</p>
[3]	<p>Correct total hours in 2019 for Slipski per timesheets provided is 36.90.</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. Center for Accessible Technology has made a substantial contribution to D.20-08-047.
2. The requested hourly rates for Center for Accessible Technology'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 \$52,277.27.

CONCLUSION OF LAW

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

ORDER

1. Center for Accessible Technology shall be awarded \$52,277.27.
2. Within 30 days of the effective date of this decision, the California Water Service Company shall pay Center for Accessible Technology the total award. 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 January 16, 2021, the 75th day after the filing of Center for Accessible Technology's request, and continuing until full payment is made.
3. California Water Service Company shall invoice the other Class A water companies for their respective shares of the award, based on their California-jurisdictional 2019 jurisdictional water revenues for the 2019 calendar year within 30 days of the effective date of this decision. Within 15 days of invoice, California-American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities (Apple Valley Ranchos), Liberty Utilities (Park Water), San Gabriel Valley Water Company, San Jose Water Company, and Suburban Water Systems shall pay California Water Service Company their respective shares of the award, based on their California-jurisdictional 2019 jurisdictional water revenues for the 2019 calendar year, to reflect the year in which the proceeding was primarily litigated.

4. The comment period for today's decision is waived.

This decision is effective today.

Dated February 24, 2022, at San Francisco, California.

ALICE REYNOLDS
President
CLIFFORD RECHTSCHAFFEN
GENEVIEVE SHIROMA
DARCIE HOUCK
JOHN R.D. REYNOLDS
Commissioners

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D2202024	Modifies Decision?	No
Contribution Decision(s):	D2008047		
Proceeding(s):	R1706024		
Author:	ALJ Camille Watts-Zagha and ALJ Robert Haga		
Payer(s):	California Water Service Company, California-American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities (Apple Valley Ranchos), Liberty Utilities (Park Water), San Gabriel Valley Water Company, San Jose Water Company, and Suburban Water Systems		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/ Disallowance
Center for Accessible Technology	November 2, 2020	\$52,345.52	\$52,277.27	N/A	See Part III.D, CPUC Comments, Disallowances, and Adjustments above

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Melissa	Kasnitz	Attorney	\$500.00	2020	\$495.00
Melissa	Kasnitz	Attorney	\$485.00	2019	\$485.00
Melissa	Kasnitz	Attorney	\$475.00	2018	\$475.00
Melissa	Kasnitz	Attorney	\$465.00	2017	\$465.00
Adrian	Slipski	Expert	\$190.00	2019 [pre-bar admission]	\$190.00
Adrian	Slipski	Attorney	\$210.00	2019 [post-bar admission]	\$210.00
Adrian	Slipski	Expert	\$190.00	2018	\$190.00
Michael	Iseri	Attorney	\$215.00	2018	\$215.00
Michael	Iseri	Attorney	\$210.00	2017	\$210.00

(END OF APPENDIX)