

Decision 22-03-025 March 17, 2022

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue  
the Development of Rates and Infrastructure  
for Vehicle Electrification.

Rulemaking 18-12-006

**GRANTING COMPENSATION TO SMALL BUSINESS UTILITY ADVOCATES  
FOR SUBSTANTIAL CONTRIBUTION TO  
DECISIONS 20-12-027 AND 20-12-029**

<b>Intervenor:</b> Small Business Utility Advocates (“SBUA”)	<b>For contribution to Decision (D.) 20-12-027 and D.20-12-029</b>
<b>Claimed:</b> \$135,365.75	<b>Awarded:</b> \$135,515.25
<b>Assigned Commissioner:</b> Clifford Rechtschaffen	<b>Assigned ALJs:</b> Sasha Goldberg and John Larsen

**PART I: PROCEDURAL ISSUES**

<b>A. Brief description of Decision:</b>	D.20-12-027 concerns policies to support and ensure efficient implementation of the Low Carbon Fuel Standard (“LCFS”) program. More specifically, the decision adopts elements of a Transportation Electrification Framework (“TEF”) staff proposal regarding utilization by the large electrical corporations of certain proceeds they earn through the LCFS program. The large electrical corporations are directed to spend certain LCFS proceeds in accordance with the guidance and regulations established by the California Air Resources Board and the California Public Utilities Commission (“Commission”). The large electrical corporations are also directed to file their plans for Low Carbon Fuel Standard expenditures as a Tier 2 Advice Letter, and coordinate their marketing, education, and outreach activities related to their Low Carbon Fuel Standard projects with other transportation electrification initiatives.
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	<p>D.20-12-029 concerns strategies and metrics to further the integration of electric vehicles as electrical grid resources, and fulfilling the obligations imposed on the Commission by Senate Bill (“SB”) 676, which requires the Commission to establish strategies and quantifiable metrics to maximize the use of feasible and cost-effective electric vehicle (“EV”) integration into the electrical grid by January 1, 2030.</p> <p>This proceeding remains open.</p>
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812<sup>1</sup>:**

	<b>Intervenor</b>	<b>CPUC Verification</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	March 1, 2019	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	April 1, 2019	Verified
4. Was the NOI timely filed?		Yes
<b>Showing of eligible customer status (§ 1802(b) or eligible local government entity status (§§ 1802(d), 1802.4):</b>		
5. Based on ALJ ruling issued in proceeding number:	R.20-08-020	Verified
6. Date of ALJ ruling:	December 23, 2020	Verified
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
<b>Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):</b>		
9. Based on ALJ ruling issued in proceeding number:	R.20-08-020	Verified
10. Date of ALJ ruling:	December 23, 2020	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes

<sup>1</sup> All statutory references are to California Public Utilities Code unless indicated otherwise.

<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.20-12-027, D.20-12-029	Verified
14. Date of issuance of Final Order or Decision:	December 21, 2020	Verified
15. File date of compensation request:	February 19, 2021	Verified
16. Was the request for compensation timely?	Yes	

**C. Additional Comments on Part I:**

#	Intervenor's Comment(s)	CPUC Discussion
1	SBUA also received a ruling on its customer status and showing of significant financial hardship in A.18-11-005 on June 24, 2019, shortly before this proceeding commenced.	Noted

**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):**

**TABLE 1: D.20-12-027  
(Low Carbon Fuel Standard)**

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<b>1. Small business eligibility to participate in equity projects</b> Many small business ratepayers are based in locations that are eligible for equity projects. As such, it was important to SBUA that D.20-12-027 make explicitly clear that small businesses located in locations eligible for equity projects were also eligible to participate in equity projects.	D.20-12-027, p. 15 ("In response to comments on the proposed decision, the Commission clarifies that small businesses located in the locations eligible for equity projects are eligible to participate in a large electrical corporation's equity projects.")  The February 14, 2020 Administrative Law Judge's Email Ruling Requesting Comments on the Energy Division's draft Transportation Electrification Framework requested with respect to	Verified

<p>The D.20-12-027 clarified this important point.</p>	<p>Section 6 of the TEF, “Please identify any additional barriers or communities that should also be considered to adequately address equity within the investor-owned utilities’ transportation electrification programs.” In response, SBUA advocated to address barriers and equity considerations related to small businesses. “SBUA’s primary comment along these lines is that the small businesses located in and serving the ESJ communities are part of the community, and should be covered by the ESJ efforts and metrics.” SBUA Comments of March 6, 2020 at 11.</p>	
<p><b>2. Party Proposals for LCFS Expenditures</b></p> <p>SBUA argued that the Commission has the authority to impose requirements on the LCFS expenditures of the large electrical corporations. Not all parties agreed. However, D.20-12-027 expressly maintains the Commission’s authority to do so as long as the requirements are complementary to CARB regulation.</p> <p>SBUA analyzed and provided commentary on how LCFS holdback revenue should be spent and recommended to the Commission that it be used for the benefit of future EV drivers by increasing incentives for used EV purchases, as recommended by the draft TEF.</p> <p>D.20-12-027 holds that it is reasonable for the Commission to further refine CARB’s broad goals into certain project areas for the purpose of helping</p>	<p>D.20-12-027, p. 20 (“Small Business Utility Advocates (SBUA) believed that any Commission orders should increase incentives for used EV purchases, as recommended by the draft TEF.”)</p> <p>D.20-12-027, Finding of Fact 2 (“There are various state policy objectives regarding TE that could be advanced if the LCFS holdback revenue were directed toward certain projects.”).</p> <p>D.20-12-027, Finding of Fact 6 (“Further refining CARB’s broad goals for LCFS expenditures into certain project areas will help achieve specific state policy goals around EV adoption, equitable distribution of EV infrastructure development, and advancing the deployment of EV infrastructure.”).</p> <p>D.20-12-027, Conclusion of Law 11 (“LCFS holdback expenditures must benefit current or future EV drivers in California.”).</p> <p>D.20-12-027, Conclusion of Law 14 (“It is reasonable to impose requirements on the large electrical corporations regarding their use of LCFS holdback</p>	<p>Verified</p>

<p>achieve specific state policy goals as long as the Commission’s more refined goals benefit current or future EV drivers and comply with the equity project requirements. This holding resulted in part from SBUA’s and other intervenors’ proposals, for the use of LCFS holdback revenue to help meet certain state policy goals.</p>	<p>revenues to advance state policy goals surrounding TE.”).</p> <p>The February 14, 2020 Administrative Law Judge’s Email Ruling Requesting Comments on the Energy Division’s draft Transportation Electrification Framework posed the question, “Section 11.3, Question 1: “Do Energy Division staff’s proposed Low Carbon Fuel Standard holdback program options benefit existing and/or future electric vehicle drivers? Why or why not?” In response, SBUA wrote in its comments, “SBUA favors using [LCFS holdback revenue] to reduce the cost of a used-EV rebate program. Such a program should be designed to promote the purchase of second-hand light duty EVs and secondhand work vehicles, such as those used as fleet delivery vehicles, as they become available in the market. The promotion of lower-cost used EVs will increase the likelihood of EV adoption among small businesses, including those in DACs.” SBUA comments of May 11, 2020 at 8.</p>	
<p><b>3. LCFS Holdback Revenues Not Spent on Equity Projects Must Be Spent on Resiliency Projects</b></p> <p>SBUA supported the prioritization of resiliency projects as defined by Section 5.1 of the draft TEF (i.e., those projects that lead to the installation of EV charging facilities at evacuation/emergency response centers; and/or pilot technologies and programs that use EVs as backup power resources and provide benefits back to EV drivers to enhance resiliency in communities that</p>	<p>D.20-12-027, p. 24 (“Several parties generally supported the prioritization of resiliency projects defined in this manner, including SBUA”).</p> <p>D.20-12-027, Finding of Fact 7 (“Resiliency projects will benefit future or current EV drivers in California by supporting the ability of EVs to charge in areas experiencing an emergency, and by contributing to the reliability of the electrical grid and increasing public confidence in the use of electricity as a fuel.”).</p> <p>D.20-12-027, Finding of Fact 8 (“Enhancing community electrical</p>	<p>Verified</p>

<p>may face power shut-offs due to weather, wildfire risk, or other emergencies).</p> <p>Other parties objected to a Commission focus on this area, but the D.20-12-027 finds that it is reasonable to focus LCFS holdback expenditures on resiliency projects and programs, so long as they benefit existing or future EV drivers, consistent with CARB’s LCFS regulations.</p>	<p>resiliency is an important state policy goal.”).</p> <p>D.20-12-027, Conclusion of Law 15 (“It is reasonable to require that certain LCFS holdback expenditures not spent on equity projects must be expended on resiliency projects, unless a large electrical corporation can reasonably demonstrate why it is unable to do so, given the importance of enhancing community resiliency as a state policy goal.”).</p> <p>The February 14, 2020 Administrative Law Judge’s Email Ruling Requesting Comments on the Energy Division’s draft Transportation Electrification Framework posed the question, “Should the investor-owned utilities (IOU) prioritize projects that will test and validate resiliency strategies that utilize electric vehicles (EV) as grid resources and ensure EV drivers have adequate access to charging options during power outages?” In response, SBUA wrote in its comments, “[T]he IOUs <i>should</i> prioritize ensuring that ‘EV drivers have adequate access to charging options during power outages.’” SBUA Comments of March 6, 2020 at 8.</p>	
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**TABLE 2: D.20-12-029  
(SB 676 and VGI Strategies)**

<b>Intervenor’s Claimed Contribution(s)</b>	<b>Specific References to Intervenor’s Claimed Contribution(s)</b>	<b>CPUC Discussion</b>
<p><b>4. Revising the Definition of Electric Vehicle Grid Integration</b></p> <p>SBUA participated in Working Group (“VGI WG”) conference calls to consider</p>	<p>D.20-12-029, p. 8-10 (“Several parties recommend potential changes to the definition in the comments on the SB 676 ruling [referencing SBUA opening comments at 3 and SBUA reply comments at 3].”</p>	<p>Verified</p>

<p>how to best revise the statutory definition of VGI. SBUA supported the modification of the definition as proposed on those calls, including adding a new condition:</p> <p>“Enable services for customers <i>including resiliency</i>.” SBUA opening comments filed Aug. 17, 2020, at p. 3 (emphasis added).</p> <p>In D.20-12-029, the Commission found that the addition of a reference to the ability of VGI systems to provide resiliency in the face of disruptions to electricity supplies is reasonable and should be approved.</p>	<p>D.20-12-029, Conclusions of Law 3 (The addition of resiliency to the statutory definition of VGI is reasonable and should be approved.”)</p>	
<p><b>5. Pilots, Demonstrations, Emerging Technology, and Studies</b></p> <p>SBUA believed that the pilots and demonstrations of the VGI programs identified in the VGI WG’s June 30, 2020 Final Report would be helpful in refining some VGI strategies for the future—in particular, those that would allow the Commission to “gain invaluable information via ‘learning by doing’” (<i>i.e.</i>, including those that do not immediately provide quantifiable results or benefits). SBUA opening comments filed Aug. 17, 2020, at p. 7.</p> <p>In D.20-12-029, the Commission found that pursuit of VGI pilots, demonstrations,</p>	<p>D.20-12-029, p. 19 (“This decision finds that pursuit of VGI pilots, demonstrations, emerging technologies, and studies is a reasonable VGI strategy and should be adopted as a non-SB 676 VGI strategy. While these activities will support the development of cost-effective and feasible technology, they may not provide immediately quantifiable cost-effective benefits.”)</p> <p>D.20-12-029, Finding of Fact 1 (“Pursuit of VGI pilots, demonstrations, emerging technologies, and studies is a reasonable VGI strategy and should be adopted as a non-SB 676 VGI strategy.”)</p> <p>D.20-12-029, Finding of Fact 6 (“Pursuit of VGI pilots, demonstrations, emerging technologies, and studies will advance VGI, as defined by this decision, by ensuring that proven VGI technologies can be scaled and by</p>	<p>Verified</p>

emerging technologies, and studies should be adopted.	expanding the technology required to advance VGI.”).	
<p><b>6. Accelerate Use of EVs for Bi-Directional Non- Grid-Export Power and PSPS Resiliency and Backup</b></p> <p>SBUA supported the VGI WG strategy of accelerating the use of EVs for bi-directional non-grid-export power and PSPS resiliency and backup, allowing customers to use their EVs to power their homes or facilities during outages and potentially support other use cases by removing non-EV load from the grid.</p> <p>D.20-12-029 found it was reasonable to adopt the VGI WG’s resiliency objective as a non-SB 676 VGI strategy.</p>	<p>D.20-12-029, p. 20-21 (“Given broad party support for this VGI strategy in principle [referencing SBUA opening comments at 5], and this decision’s inclusion of the enhancement of resiliency as part of VGI’s defined attributes (see Section 4 above) [and referencing SBUA opening comments at 3 and SBUA reply comments at 3], it is reasonable to adopt the VGI WG’s resiliency objective as a non-SB 676 VGI strategy.”).</p> <p>D.20-12-029, Finding of Fact 7 (“Accelerating the use of EVs for bi-directional non-grid-export power and PSPS resiliency and backup would support broader goals around customer resiliency.”)</p>	Verified
<p><b>7. Near-Term Policy Actions</b></p> <p>SBUA, along with other parties, proposed the adoption of near-term action plans for VGI. SBUA’s support of such action plans was based at least in part on the fact that “small businesses are likely to have greater near-term capability of adopting electric vehicles than would larger businesses.” (SBUA opening comments filed Aug. 21, 2020.) Some of SBUA’s positions included:</p> <p>Optimizing grid performance with ALM (SBUA opening comments filed Dec. 03, 2020 at p. 3).</p>	<p>D.20-12-029, p. 26 (“Several parties including... SBUA... proposed the adoption of near-term action plans for VGI. ... The Commission agrees that the record demonstrates that the time is ripe to pursue these near-term objectives and adopts several such objectives.”)</p> <p>D.20-12-029, p. 28 (“[T]he large electrical corporations shall identify in all future applications for TE programs how they will deploy customer-side ALM at host sites where this technology will support TE installation at equal or lesser costs than hardware-based electrical capacity while meeting TE charging needs.”).</p> <p>D.20-12-029, p. 33 (“The ability of EVs to supply demand response is a VGI</p>	Verified



<p>Using the ability of EVs to supply demand response (using EVs to provide demand response and determine the impact of the peak-to-off peak ratio on the behavior of EV drivers, SBUA opening comments filed Aug. 17, 2020; the Commission should include the numerous benefits of using the EV demand response in its final decision, SBUA opening comments filed Dec. 3, 2020); and</p> <p>Identifying the use cases that each VGI strategy supports (“The Commission could... require the IOUs... to assess VGI use cases...,” SBUA opening comments filed Aug. 17, 2020 at pp. 11-12).</p> <p>In D.20-12-029, the Commission agreed that the record demonstrates that the time is ripe to pursue near-term objectives and adopted several, including those proposed by SBUA.</p>	<p>policy action supported by parties and is adopted by this decision”).</p> <p>D.20-12-029, p. 44 (“[T]his decision adopts as a near-term VGI policy action a requirement that the large electrical corporations identify the use cases or categories of use cases addressed by each VGI policy action identified in this decision while filing any applications or advice letters.”).</p> <p>D.20-12-029, Finding of Fact 17 (“The record demonstrates that the time is ripe to pursue certain near-term VGI objectives.”).</p> <p>D.20-12-029, Finding of Fact 18 (“ALM is a worthy near-term VGI objective and should be promoted.”).</p> <p>D.20-12-029, Finding of Fact 20 (“The ability of EVs to supply demand response is a near-term VGI objective that should be adopted by this decision.”).</p> <p>D.20-12-029, Finding of Fact 21 (“Identification of the use cases that each VGI strategy supports is a near-term VGI objective that should be adopted by this decision.”).</p>	
<p><b>8. Equity Considerations</b></p> <p>SBUA argued that the benefits of VGI and SB 676-related strategies should be equitably distributed among communities in California—specifically, that disadvantaged communities and hard-to-reach customers, including small businesses, should receive higher subsidies in the VGI context than middle- and upper-income drivers. (SBUA</p>	<p>D.20-12-029 at pp. 45-46 (“[I]t is reasonable for this decision to adopt certain equity requirements that should be included in the adopted VGI strategies and metrics... including but not limited to: increasing investment in clean energy resources to benefit [Environmental and Social Justice (“ESJ”)] communities”).</p> <p>D.20-12-029 at p. 46 (“[T]he large electrical corporations shall develop and implement strategies to prioritize ESJ</p>	<p>Verified</p>

<p>opening comments filed Aug. 17, 2020 at p. 15.)</p>	<p>communities in siting and benefits of SB 676 pilots”).</p> <p>D.20-12-029 at p. 46 (“Any VGI programs proposed by the large electrical corporations in their future TE applications that include proposals for rebates to encourage VGI implementation shall include increased incentive levels for ESJ communities”).</p> <p>D.20-12-029 at p. 47 (“[T]he large electrical corporations should recognize that customer engagement in disadvantaged communities and low-income communities is an essential component of implementing ME&amp;O strategies for VGI programs”).</p> <p>D.20-12-029, Conclusion of Law 24 (“It is reasonable to adopt certain equity requirements that would apply to some of the adopted VGI strategies and metrics.”).</p> <p>D.20-12-029 Ordering Paragraph 8 (“Southern California Edison Company, San Diego Gas &amp; Electric Company, and Pacific Gas and Electric Company shall, each, in all of its future applications for transportation electrification (TE) programs: ... demonstrate that any VGI programs proposed consider the Commission’s Environmental and Social Justice (ESJ) Action Plan; [and] provide increased incentive levels for ESJ communities if it proposes rebates to encourage VGI implementation...”).</p> <p>D.20-12-029 Ordering Paragraph 15 (“Southern California Edison Company, San Diego Gas &amp; Electric Company, and Pacific Gas and Electric Company shall jointly develop and implement strategies to prioritize environmental and social justice communities in siting</p>	
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	and realizing the benefits of the Vehicle Grid Integration (VGI) pilots ordered by this decision, including working with community-based organizations. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall jointly include equity strategies as a topic in the VGI pilots workshop ordered by this decision.”).	
<p><b>9. Collaboration between large electrical corporations and CCAs</b></p> <p>The draft TEF requested party comments regarding the appropriate role of CCAs to advance VGI. In response, SBUA provided opening comments agreeing with the VGI WG Final Report (SBUA opening comments filed Aug. 17, 2020 at pp. 5, 6). SBUA also mentioned specific topics (SBUA opening comments filed Aug. 21, 2020 at pp. 6-8).</p> <p>D.20-12-029 ordered collaboration between each large electric corporation and the CCAs the overlap with each one’s service territory.</p>	<p>D.20-12-029 at pp. 66 “[T]his decision orders that each large electrical corporation host a meeting with CCAs that overlap with their service territory and interested LSEs within 60 days of the effective date of this decision.”).</p> <p>D.20-12-029, Ordering Paragraph 21 (“Southern California Edison Company, San Diego Gas &amp; Electric Company, and Pacific Gas and Electric Company shall each host a meeting with Community Choice Aggregators (CCAs) that overlap with its service territory and other interested load-serving entities (LSEs) within 60 days of the effective date this decision.”).</p>	Verified

**B. Duplication of Effort (§ 1801.3(f) and § 1802.5):**

	<b>Intervenor's Assertion</b>	<b>CPUC Discussion</b>
<b>a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?<sup>2</sup></b>	Yes	Verified
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	Yes	Verified
<b>c. If so, provide name of other parties:</b>  <b>Parties Participating in D.20-12-027</b>  <p>Many parties including Ecology Action, Joint Community Choice Aggregators, Peninsula Clean Energy, Advanced Energy Economy ("AEE"), EVgo, Tesla, The Utility Reform Network ("TURN"), Electrify America, Green Power Institute and Community Environmental Council, Vehicle Grid Integration Council, and Public Advocates ("Cal Advocates") expressed opinions on how LCFS holdback revenue should be spent and demonstrated substantial interest in using LCFS revenue to help meet certain state policy goals.</p> <p>And several parties generally supported the prioritization of resiliency projects as defined by Section 5.1 of the draft TEF, including Liberty CalPeco, Southern California Edison, the California Energy Storage Alliance, Cal Advocates, Connect California LLC, VGIC, EVgo, TURN, AEE, and the parties referred to as "Joint Commenters" (i.e., Center for Community Action and Environmental Justice, East Yard Communities for Environmental Justice, Sierra Club, Union of Concerned Scientists, and Center for Biological Diversity).</p> <p>However, none of the parties made the same recommendations in support of the interests of the same ratepayer class as SBUA.</p> <b>Parties Participating in D.20-12-029</b>  <p>There was widespread support among the parties for revising the definition of VGI, but there is some dispute about the particular changes to be made. And not all parties recommended specific changes. Along with SBUA, D.20-12-029 mentioned the changes proposed by Pacific Gas &amp; Electric ("PG&amp;E"), San Diego Gas &amp; Electric ("SDG&amp;E"), Southern</p>		Verified

<sup>2</sup> The Office of Ratepayer Advocates was renamed the Public Advocate's Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

<p>California Edison (“SCE”), Union of Concerned Scientists (“UCS”), Tesla, Joint Commenters, and Fermata.</p> <p>Many parties agreed that further pilots, demonstrations, an emerging technology program and studies would be helpful in refining some VGI strategies for the future. However, other than SBUA, D.20-12-029 specifically cited to the positions of only PG&amp;E, SCE, and the Joint Commenters (whose support was conditional).</p> <p>Many parties supported the VGI WG strategy of accelerating the use of EVs for bi-directional non- grid-export power and PSPS resiliency and backup along with SBUA, including Joint Commenters and Utility Consumers’ Action Network (“UCAN”).</p> <p>Several parties including SBUA, Joint Commenters, UCAN, and UCS proposed the adoption of near-term action plans for VGI.</p> <p>Several parties along with SBUA pointed to the need to ensure that the benefits of VGI and SB 676-related strategies were equitably distributed among communities in California, including UCS and Joint Commenters.</p> <p>Several parties pointed to the need to ensure that the benefits of VGI and SB 676-related strategies were equitably distributed among communities in California. However, other than SBUA, D.20-12-029 cited only to UCS and Joint Commenters.</p> <p>And, with respect to the role of Community Choice Aggregators (“CCAs”), AEE and PG&amp;E were the only parties other than SBUA who provided opening comments agreeing with the VGI WG Final Report, which states that “coordination and planning between CCAs and [large electrical corporations] on VGI will be essential.”</p> <p>However, despite occasionally taking similar positions, none of the other parties made the same recommendations in support of the interests of the same ratepayer class as SBUA.</p>	
<p><b>d. Intervenor’s claim of non-duplication:</b></p> <p>SBUA sought to reduce overlap of efforts by presenting unique perspectives on the concerns of small business ratepayers as a group as opposed to other customer classes. SBUA’s advocacy therefore differed from others, and SBUA was the only party that single-mindedly focused exclusively on the interests of small businesses. Throughout its involvement in matters related to D.20-20-27 and D.20-20-29, SBUA took all reasonable steps to coordinate its efforts with other parties and keep unnecessary duplication to a minimum.</p>	Noted

Therefore, while other parties may have had positions that were similar to SBUA in some instances, the Commission should find that SBUA’s perspectives and goals were necessarily different from other parties and supplemented—not duplicated—any efforts on common issues. The Commission should find that all of the hours claimed by SBUA are reasonable and should be fully compensated.	
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### PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
<p><b>a. Intervenor’s claim of cost reasonableness:</b></p> <p>SBUA’s main objective for the proceeding was to protect and advance the interests of small business ratepayers that in the past have been underrepresented in utility proceedings, including proceedings related to electric vehicles, VGI integration, and EV infrastructure. Small businesses are an important customer class to consider in the development of EV infrastructure and promotion low-carbon fuel standards. Small businesses exist throughout the state but are especially important to low-income and minority communities. SBUA participated in this proceeding to encourage EV policies and initiatives that are beneficial to small businesses, which are often hard-to-reach customers.</p> <p>SBUA’s compensation request seeks an award of \$135,365.75 for work performed related to D.20-12-037 and D.20-12-029 as well as work related to our initial involvement in the docket (<i>e.g.</i>, commenting on the OIR and attending the Prehearing Conference). The Commission should find this is a reasonable request for fees because SBUA has participated fully in this proceeding for over two years (since February 2019) and has dedicated staff and consultants to attend numerous time intensive workshops related to VGI and TEF, analyze and research complex issues, and draft and submit multiple comments on the TEF, implementation of the LCSF program, VGI proposals, and EVs as electric grid resources. SBUA’s work entailed drafting and submitting 15 substantive pleadings as shown in the docket, including with responses to numerous ALJ rulings requesting shareholder input and multiple comments on the proposed decisions. As discussed above, the Commission cited to and considered SBUA’s</p>	Noted

<p>positions in the Decisions, and SBUA’s advocacy was to the benefit of small business and other ratepayers.</p> <p>For these reasons, the Commission should find that SBUA’s efforts have been valuable and the request for costs reasonable.</p>	
<p><b>b. Reasonableness of hours claimed:</b></p> <p>SBUA relied on a team of attorneys and several experts for its advocacy related to this compensation request. SBUA devoted approximately 89 hours of time to the portions of the proceeding relevant to D.20-12-027, which is reasonable considering the importance of low carbon fuel standard program to small businesses and other ratepayers and the various workshops that stakeholders engaged on. SBUA also devoted approximately 200 hours of time to the portions of the proceeding relevant to D.20-12-029, which is reasonable considering the various and complex issues related to implementing SB 676 and identifying VGI strategies.</p> <p>Two attorneys took the lead on this matter. SBUA’s attorney Itzel Berrio Hayward, a senior attorney, served as lead counsel on matters related to D.20-20-27. She was responsible for research, drafting pleadings, and coordinating with experts. Ms. Berrio Hayward spent 59 hours on issues related to these decisions, or the equivalent of just under 1 ½ weeks’ worth of time. SBUA’s Litigation Supervisor Jennifer Weberski served as lead counsel on matters related to D.20-20-29. She was responsible for coordinating SBUA’s participation in workshops, including VG2 and VGI workshops, researching, analyzing, and drafting various SBUA positions, and developing SBUA’s positions with experts. Ms. Weberski devoted approximately 92 hours on this proceeding, the equivalent of less than 2 ½ weeks’ worth of time. Ms. Berrio Hayward and Ms. Weberski coordinated their attorney efforts to avoid unnecessary duplication and worked together efficiently.</p> <p>Attorneys Ivan Jiminez and Ariel Strauss also participated early in the proceeding prior to Ms. Berrio Hayward’s participation. Mr. Jiminez devoted a little less than 11 hours on this proceeding and Mr. Strauss devoted a little less than 5 hours on this proceeding.</p> <p>SBUA’s outside consultant Paul Chernick at Resource Insight, Inc. served as SBUA’s lead consultant and utility expert in this proceeding. He played a critical role in analyzing issues and developing and promoting SBUA’s positions. In this capacity, he consulted with SBUA for a little less than 64 hours—or the equivalent of approximately 8 days’ worth of time. His colleague at Resource Insight, John Wilson, consulted with SBUA for only 4 ½ hours.</p>	Noted

<p>In addition, SBUA's expert Ted Howard was responsible for participating in the Vehicle-Grid Integration Working Groups in 2020. Because Mr. Howard is also actively engaged with VGI issues under Electric Rule 21 Proceeding in R.17-07-007, SBUA assigned him to assist with attending various VGI workshops in R.18-12-006 and coordinate SBUA's positions with regard to overlapping VGI issues between the two proceedings. Accordingly, Mr. Howard worked to develop SBUA's VGI Working Group recommendations in 2020 immediately leading up to D.12-12-029 to ensure they complied with statutory requirements and are beneficial to small business ratepayers. He devoted less than 24 hours to work on this proceeding, or slightly less than 3 days' worth of time.</p> <p>SBUA's President and General Counsel, James Birkelund, participated in this proceeding developing litigation positions, providing strategic direction, managing work efforts, overseeing and coordinating the legal team, and for the final review and edits to work product. SBUA seeks compensation for approximately 30.8 of his hours here, or the equivalent of approximately 4 days' worth of work.</p> <p>SBUA submits that it made significant contributions to the proceeding and all of the recorded hours claimed were reasonably and efficiently expended and appropriate in the context of the level of effort required to participate in this case relative to these two decisions and our initial involvement in the docket. Therefore, SBUA seeks compensation for all of the hours recorded by our attorneys and experts and included in this request.</p>	
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<p><b><u>Topics related to D.20-12-027</u></b></p> <p><u>Issue 1</u>: Small business participation in equity projects  <u>Issue 2</u>: LCFS Expenditures  <u>Issue 3</u>: LCFS Holdback Revenues  <u>Issue 4</u>: Other Issues (submetering, annual and interim reports, TEF matters not elsewhere covered)  <u>Issues 5</u>: Workshops  <u>Issue 6</u>: General (the work in this category includes activities associated with general participation in this proceeding, such as responding to the OIR, attending the PHC, assessing ALJ procedural rulings, conferring with other parties, and reading parties' pleadings on miscellaneous issues as necessary to determine SBUA's participation)</p> <p><b><u>Topics related to D.20-12-029</u></b></p> <p><u>Issue 1</u>: Defining Electric Vehicle Grid Integration  <u>Issue 2</u>: Pilots and Demonstrations  <u>Issue 3</u>: Accelerating the Use of EVs for Bi-Directional Non- Grid-Export Power and PSPS Resiliency and Backup  <u>Issue 4</u>: Near-Term Policy Action  <u>Issue 5</u>: Equity Considerations  <u>Issue 6</u>: Collaboration between large electrical corporations and CCAs  <u>Issue 7</u>: Other Issues (cybersecurity, uptake reports, TEF section 7/8, TEF cost effectiveness issues, electric truck requirements)  <u>Issue 8</u>: Workshops</p> <p>SBUA allocated the majority of its general participation time (attending the PHC, responding to procedural meetings, and the like) primarily to D.20-12-027 and submits this is a reasonable approach. Should the Commission wish to see different breakdown of SBUA's hourly work, SBUA requests to be so informed and provided an opportunity supplement this request accordingly.</p>	Noted
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**B. Specific Claim:\***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Jennifer Weberski	2019	71.7	\$460	2018 rate from D.18-10-047 escalated by a 5% step	\$32,982	71.70	\$460.00 [1]	\$32,982.00

				increase plus 2.35% COLA per Res. ALJ- 357				
Jennifer Weberski	2020	20.2	\$470	As above, escalated by a 2.55% COLA in Res. ALJ- 387	\$9,494	20.20	\$470.00 [2]	\$9,494.00
Itzel Berrio Hayward	2020	59	\$495	Res. ALJ- 387; <i>see</i> Comment 1	\$29,205	59.00	\$495.00 [3]	\$29,205.00
Ivan Jiminez	2019	11.3	\$245	D.20-06-013	\$2,768.50	11.30	\$245.00	\$2,768.50
Ariel Strauss	2019	4.1	\$375	D.20-06-013	\$1,537.50	4.10	\$375.00	\$1,537.50
Paul Chernick	2019	34.9	\$400	D.20-06-015	\$13,960	34.90	\$400.00	\$13,960.00
Paul Chernick	2020	29	\$430	D.20-06-015, increased by a 5% step increase and escalated by a 2.55% COLA increase per Res. ALJ- 387; <i>see</i> Comment 2.	\$12,470	29.00	\$430.00 [4]	\$12,470.00
John Wilson	2019	4.5	\$360	ALJ 387; <i>see</i> Comment 3.	\$1,620	0 [5]		\$0.00
John Wilson	2020					4.50 [5]	\$360.00 [6]	\$1,620.00
Ted Howard	2020	23.8	\$385	Res. ALJ- 387; <i>see</i> Comment 4	\$9,163	23.80	\$375.00 [7]	\$8,925.00
James Birkelund	2019	8.1	\$495	D.20-06-013	\$4,009.50	8.10	\$495.00	\$4,009.50

James Birkelund	2020	22.7	\$510	D.20-06-015 escalated by a 2.55% COLA increase per Res. ALJ-387	\$11,577	22.70	\$510.00 [8]	\$11,577.00
Subtotal: \$128,786.50						Subtotal: \$128,548.50		
INTERVENOR COMPENSATION CLAIM PREPARATION**								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Ivan Jimenez	2019	2.1	\$122.50	50% of 2019 rate	\$257.25	2.10	\$122.50	\$257.25
Itzel Berrio Hayward	2020	11.7	\$247.50	50% of 2020 rate	\$2,895.75	11.70	\$247.59	\$2,895.75
Itzel Berrio Hayward	2021	1.5	\$247.50	50% of 2020 rate; see Comment 5	\$371.25	1.50	\$247.50	\$371.25
Jennifer Weberski	2020	8	\$235.00	50% of 2020 rate	\$,1880.00	8.00	\$235.00	\$1,880.00
Jennifer Weberski	2021	5	\$235.00	50% of 2020 rate; see Comment 5	\$1,175.00	5.00	\$312.50 [9]	\$1,562.50
Subtotal: \$6,579.25						Subtotal: \$6,966.75		
TOTAL REQUEST: \$135,365.75						TOTAL AWARD: \$135,515.25		
<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. Intervenor’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</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 <sup>3</sup>	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Itzel Berrio Hayward	December 1997	192385	No
James M. Birkelund	March 2000	206328	No
Ivan Jiminez	December 2016	313644	No
Ariel Strauss	March 2012	282230	No

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

Attachment or Comment #	Description/Comment
Attachment 1	Timesheets with Allocation of Hours by Issue for D.20-12-027
Attachment 2	Timesheets with Allocation of Hours by Issue for D.20-12-029
Attachment 3	Resumé / Professional Qualifications of Itzel Berrio Hayward
Attachment 4	Resumé / Professional Qualifications of John D. Wilson
Attachment 5	Resumé / Professional Qualifications of Ted Howard
Comment 1	<p><u>2020 Hourly Rate for Itzel Berrio Hayward</u></p> <p>SBUA seeks an hourly rate for the work of attorney Itzel Berrio Hayward of \$495 for her work in 2020.</p> <p>The requested rate reflects Ms. Berrio Hayward’s 23 years of experience as an attorney, including experience before this and other states’ public utilities commissions.</p> <p>Ms. Berrio Hayward first appeared before the California Public Utilities Commission in 1997 after receiving a fellowship from the Greenlining Institute. She served as Law and Policy Fellow at Greenlining Institute from 1997 to 1998. After that, she worked at a major San Francisco law firm where she served as outside counsel for an Incumbent Local Exchange Carrier. Then in 1999 she took a position as a Government and Industry Affairs Attorney for NorthPoint Communications, a Competitive Local Exchange Carrier. While there, she appeared at different state public utilities commissions across the country. After NorthPoint dissolved in 2000, Ms. Berrio Hayward returned to Greenlining and served as its Deputy General Counsel for five years. In D.04-10-033, the</p>

<sup>3</sup> This information may be obtained through the State Bar of California’s website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

	<p>Commission approved an hourly rate of \$300 for Ms. Berrio Hayward for work performed in 2004.</p> <p>From 2005 to 2010, Ms. Berrio Hayward served as an executive staff member in the State Bar of California—a highly complex, open, and transparent public setting tasked with protecting consumers, enhancing justice, and balancing the needs of multiple constituencies. While there, she assisted in matters before the State Bar Court all the way up to appeals before the California Supreme Court.</p> <p>In 2010, Ms. Berrio Hayward started her own business and continued working with attorneys in a variety of ways, including by becoming a certified as a Minimum Continuing Legal Education (MCLE) Provider by the State Bar of California.</p> <p>In 2017, Ms. Berrio Hayward opened her own legal practice with a focus on advising electric and telecommunications utilities on a broad range of commercial, regulatory, and policy issues. She also served as a subcontractor for a law firm doing contract work for an Investor-Owned Utility.</p> <p>Ms. Berrio Hayward’s requested rate of \$495 falls in the middle of the approved range of rates for her experience level set forth in Draft ALJ-Res. 387. For these reasons, the Commission should find Ms. Berrio Hayward’s requested rate for her work in 2020 to be reasonable.</p>
Comment 2	<p><u>2020 Hourly Rate for Expert Paul L. Chernick</u></p> <p>The Commission set Mr. Chernick’s 2019 rate at \$400 in D.20-06-015. For 2020, SBUA requests a step increase and COLA adjustment with the resultant rate for Mr. Chernick of \$430 per hour (<math>400 \times 1.05 \times 1.0255</math>, rounded to the nearest five, per D.13-05-009). Resolution ALJ-387 states that “It is reasonable to allow individuals an annual “step increase” of five percent, twice within each experience level and capped at the maximum rate for that level, as authorized by D.07-01-009.” Mr. Chernick has not received a step increase for his experience level. In addition, Resolution ALJ-387 proposes a Cost-of-Living Adjustment (COLA) of 2.55% for 2020.</p>
Comment 3	<p><u>2020 Hourly Rate for Expert John D. Wilson</u></p> <p>The Commission has not previously approved an hourly rate for Mr. Wilson’s work in a CPUC proceeding. SBUA seeks an hourly rate of \$360 for the work he performed in 2020. Mr. Wilson’s requested compensation “take[s] into consideration the market rates paid to persons of comparable training and experience who offer similar services,” <i>see</i> PUC § 1806, is within the established 2020 range of rates for his level of experience and is in accordance with Resolution ALJ-387 and the Commission’s guidelines in D. 05-11-031.</p>

Mr. Wilson is a public policy expert with a Master of Public Policy from Harvard University, 1990, and a Bachelor of Arts in Physics from Rice University, 1992. He has worked as an expert, consultant, and analyst since 1992 – a period of over 28 years – and has exceptionally strong credentials. For 12 years, from 2007-2019, Mr. Wilson was the Deputy Director for Regulatory Policy, Southern Alliance for Clean Energy where he managed regulatory policy, including supervision of experts in areas of energy efficiency, renewable energy, and market data, provided expert witness testimony on a broad range of public policy and utility matters, including rate design, resource planning, renewable energy, energy efficiency, and resource procurement, and directed litigation activities. In 2019 he joined Resource Insight, Inc. as its Research Director, where he continues working as a policy expert on a wide range of utility matters, including for SBUA in CPUC proceedings. Mr. Wilson has submitted expert testimony in numerous PUC dockets. Additionally, Mr. Wilson is the author or co-author of over 55 publications, reports, and presentations dealing with utility and energy issues.

A copy of Mr. Wilson’s professional qualifications is included herewith as Attachment 4.

The reasonableness of the \$360 rate is confirmed when compared to the rates the Commission has approved for other experts with comparable qualifications and experience in the energy industry and administrative proceedings. *See* PUC § 1806; guidelines in D.05-11-031. For example, the Commission granted an hourly rate of \$435 for work performed by A4NR’s expert, Richard Wolfe, in 2018. D.18-10-050. Mr. Wolfe at the time had over 30 years of experience as an expert and consultant, *id.*, at pp. 30-31, which is two more years than Mr. Wilson, but the requested rate for Mr. Wilson is considerably lower (\$75 less an hour) than Mr. Wolfe. The Commission granted an hourly rate of \$395 for work performed by TURN’s expert, Bruce Lacy, in 2017. D.18-10-045. Mr. Lacy has approximately 34 years of experience as an expert in 2017, 6 years more experience than Mr. Wilson, but rates have increased since 2017, *see* D.11-03-022, p. 12 (Mr. Lacy had 28 years of experience in 2011), and Mr. Wilson is requesting a rate \$30 lower than Mr. Lacy was awarded 3 years ago in 2017. Mr. Wolfe and Mr. Lacy are apt comparisons because both are colleagues with high levels of experience in energy law and administrative proceedings, like Mr. Wilson.

In sum, the requested 2020 hourly rates for services provided by Mr. Wilson in this proceeding are justified on the years of experience this expert has in the energy industry based on the schedule of hourly rates adopted by the Commission in Resolution ALJ-387 for experts with comparable experience. For 2020, the PUC compensated experts with 13+ yrs. of experience in the range of \$190-\$465 per hour. Resolution ALJ-387. Mr. Wilson’s requested rate of \$360

	is within the adopted range and justified by his 28+ years of experience and credentials and comparisons with colleagues.
Comment 4	<p><u>2020 Hourly Rate for Expert Ted Howard</u></p> <p>SBUA seeks an hourly rate for expert Ted Howard of \$385 for his work in 2020. SBUA made similar requests in I.19-090-016 and A.13-11-005 to set Mr. Howard's rate at \$375 in 2019. Pending a favorable decision on those compensation claims, the 2019 hourly rate here will be Escalated by a Cost-of-Living Adjustment (0.255% per ALJ-387) to \$385 in 2020.</p> <p>Mr. Howard is SBUA's Senior Energy Policy Analyst, and his requested compensation "take[s] into consideration the market rates paid to persons of comparable training and experience who offer similar services," <i>see</i> PUC § 1806, is within the established 2020 range of rates for his level of experience and is in accordance with the Commission's guidelines in D. 05-11-031.</p> <p>The requested rate for Mr. Howard is reasonable in light of his significant expertise in the energy field and 40 years of professional experience. In 1981, Mr. Howard started his career as an Economist at the Massachusetts Department of Public Utilities. From 2005-2013, he spent 7 years working as an Analyst at the California Public Utilities Commission from 2005 to 2012. From 2012-2019, he spent 7 years working with a small business, Sustainable, on energy issues in the Bay Area, including consulting with PG&amp;E on electric vehicle charging station challenges and strategies for small and medium businesses. During his almost 40-year career, Mr. Howard also has held numerous executive and management positions with larger corporations; he has certifications in Energy Innovation &amp; Emerging Technologies, Stanford University (2012), Smart Grid Technology, University of California-Berkeley (2011), and Sustainable Energy &amp; Storage, Stanford University (2011); and he has published numerous reports on energy and policy matters. Mr. Howard earned a Master of Science in Resource Economics from Virginia Tech in 1980 and a Bachelor of Science in Resource Economics from University of Massachusetts in 1977.</p> <p>A copy of Mr. Howard's professional qualifications is included herewith as Attachment 5.</p> <p>The reasonableness of the \$375 rate is confirmed when compared to the rates the Commission has approved for other experts with comparable qualifications and experience in the energy industry. <i>See</i> PUC § 1806; guidelines in D.05-11-031. For example, the Commission set a first-time hourly rate of \$400 for work performed by Sierra Club's expert, James Caldwell, in 2017. D.19-05-015. Mr. Caldwell is an apt comparison with Mr. Howard because both are seasoned experts with long, distinguished careers. Mr. Howard's requested rate of \$375 in 2019 is significantly below (\$25 less an hour) than the \$400 awarded for Mr. Caldwell, and rates have increased since 2017. Similarly, the Commission recently awarded a rate of \$435 for work performed by A4NR's expert, Richard</p>

	<p>Wolfe, in 2018. D.18-10-050. And the Commission granted an hourly rate of \$395 for work performed by TURN's expert, Bruce Lacy, in 2017. D.18-10-045. Mr. Wolfe and Mr. Lacy are apt comparisons because both are colleagues with extensive experience with energy issues and 30+ year careers, like Mr. Howard. SBUA is requesting a significantly lower rate for Mr. Howard than granted to these other experts.</p> <p>For 2019, the PUC compensated expert with 13+ yrs. of experience in the range of \$185-\$455 per hour. Resolution ALJ-357. Mr. Howard's requested rate of \$375 is within the adopted range and represents approximately the 70th percentile between \$185 and \$455. In light of his 40 years of experience and credentials and favorable comparisons with colleagues, the requested rate is clearly reasonable and consistent with the range adopted by the Commission.</p>
Comment 5	<p><b>Time on Compensation:</b> Because all merit work related to these decisions was completed by calendar year 2020, SBUA is seeking compensation for time spent in 2021 on this request at ½ our standard hourly rates for 2020.</p> <p>SBUA plans to and reserves its right to request updated rates for 2021 in accordance with the market study and formulas adopted by the Commission in Resolution ALJ-393, issued on December 22, 2020, in our future requests for compensation that include work in 2021.</p>

#### D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1]	Per D.22-01-012, Weberski's adopted rate in 2019 is \$460
[2]	Per D.22-01-012, Weberski's adopted rate in 2020 is \$470.
[3]	Per D.21-10-011, Berrio Hayward's adopted rate in 2020 is \$495.00
[4]	Per D.21-10-011, Chernick's adopted rate in 2019 is \$430.
[5]	Per timesheets submitted for Wilson all hours were completed in 2020. We update the claim to reflect the proper year for the work completed.
[6]	Adopting \$360 rate for 2020. New rate based on Resolution ALJ-387 for an expert with 13 plus years of experience. Wilson has a master's degree in Public Policy from Harvard University and BA in Physics from Rice University. He has worked as an expert, consultant and an analyst since 1992. Wilson worked as the Deputy Director for Regulatory, policy, Southern Alliance for Clean Energy for 12 years. In 2019 he joined Resource Insight, Inc. as its Research Director.
[7]	Per D.21-07-021, Howard's adopted rate in 2020 is \$375.00
[8]	Per D.21-10-011, Birkelund's adopted rate in 2020 is \$510.



[9]	Per D.22-01-012, Weberski's adopted rate in 2021 is \$625.00 Icomp preparation is compensated at ½ the preparer's normal rate which in this case will be \$312.50
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#### **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))**

<b>A. Opposition: Did any party oppose the Claim?</b>	No
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<b>B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?</b>	Yes
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#### **FINDINGS OF FACT**

1. Small Business Utility Advocates has made a substantial contribution to D. 20-08-044.
2. The requested hourly rates for Small Business Utility Advocates' representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses as adjusted herein are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$135,515.25.

#### **CONCLUSION OF LAW**

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

#### **ORDER**

1. Small Business Utility Advocates shall be awarded \$135,515.25.
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 Small Business Utility Advocates 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 May 5, 2021, the 75<sup>th</sup> day after the filing of Small Business Utility Advocates' request, and continuing until full payment is made.

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

This decision is effective today.

Dated March 17, 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:	D2203025	Modifies Decision?	No
Contribution Decision(s):	D2012027, D2012029		
Proceeding(s):	R1812006		
Author:	ALJs Goldberg and Larsen		
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company		

**Intervenor Information**

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Small Business Utility Advocates	Feb. 19, 2021	\$135,365.75	\$135,515.25	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
Itzel	Berio Hayward	Attorney	\$495	2020	\$495.00
Ivan	Jimenez	Attorney	\$245	2019	\$245.00
Ariel	Strauss	Attorney	\$375	2019	\$375.00
Jennifer	Weberski	Attorney	\$460	2019	\$460.00
Jennifer	Weberski	Attorney	\$470	2020	\$470.00
Jennifer	Weberski	Attorney	n/a	2021	\$625.00
Paul	Chernick	Expert	\$400	2019	\$400.00
Paul	Chernick	Expert	\$430	2020	\$430.00
John	Wilson	Expert	\$360	2020	\$360.00
Ted	Howard	Expert	\$385	2020	\$375.00
James	Birkelund	Attorney	\$495	2019	\$495.00
James	Birkelund	Attorney	\$510	2019	\$510.00

**(END OF APPENDIX)**