

Decision 22-03-021 March 17, 2022

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding
Microgrids Pursuant to Senate Bill 1339 and
Resiliency Strategies.

Rulemaking 19-09-009

**DECISION GRANTING COMPENSATION TO
CENTER FOR ACCESSIBLE TECHNOLOGY
FOR SUBSTANTIAL CONTRIBUTION TO DECISION 20-06-017**

Intervenor: Center for Accessible Technology (CforAT)	For contribution to Decision (D.) 20-06-017
Claimed: \$38,480.50	Awarded: \$38,222.25
Assigned Commissioner: Genevieve Shiroma	Assigned ALJ: Colin Rizzo

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.20-04-007 adopts short-term actions related to the acceleration of microgrid deployment and related resiliency strategies for Track 1 of Rulemaking 19-09-009. The decision accelerates interconnection of resiliency projects in advance of the upcoming wildfire season, modernizes tariffs, promotes collaborative engagement, and approves an array of resiliency proposals.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812¹:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	12/17/19	Verified
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	01/14/20	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.20-01-007. See note below	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:	R.20-01-007. See note below	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
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.20-06-017	Verified
14. Date of issuance of Final Order or Decision:	6/11/20	Verified
15. File date of compensation request:	8/14/20	Verified
16. Was the request for compensation timely?		Yes

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

C. Additional Comments on Part I:

#	Intervenor’s Comment(s)	CPUC Discussion
	No ruling on CforAT’s eligibility for intervenor compensation has been issued in this proceeding. CforAT’s most recent determination of eligibility was issued in R.20-01-007, as noted above.	

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>General Overview: In Track 1, the Commission requested proposals for short-term action from the utilities, and put forward staff recommendations in the form of a Staff Proposal. Parties were invited to comment on both the utility proposals and the staff recommendations. CforAT attended the Workshop and Prehearing Conference, and provided in-depth comments on the utilities’ and staff’s recommendations outlined in the Staff Proposal and the Proposed Decision, focusing on those issues that would be most significant for our constituency of utility customers with disabilities.</p>	<p>Energy Division Staff Workshop (Dec. 12, 2019)</p> <p>Prehearing Conference (Dec. 17, 2019).</p> <p>Administrative Law Judge’s Ruling Requesting Comments on Track 1 Microgrid and Resiliency Staff Proposal (Jan. 21, 2020) at p. 2 (requesting comments on attached Staff Proposal, hereinafter “Staff Proposal”).</p> <p>Comments of the Center for Accessible Technology on Proposals Regarding Track 1 Microgrid and Resiliency Strategies (Jan. 30, 2020) (responding to above request for comment, hereinafter “CforAT Comments”).</p> <p>Proposed Decision Adopting Short-Term Actions to Accelerate Microgrid Development and Related Resiliency Solutions (April 29, 2020) at p. i (requesting parties file comments).</p> <p>Comments of the Center for Accessible Technology on Proposed Decision Adopting Short-Term Actions to Accelerate Microgrid Deployment and</p>	<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
	<p>Related Resiliency Solutions (May 19, 2020) (hereinafter “Comments on PD”).</p> <p>Reply Comments of the Center for Accessible Technology on Proposed Decision Adopting Short-Term Actions to Accelerate Microgrid Deployment and Related Resiliency Solutions (May 26, 2020).</p> <p>Decision Adopting Short-Term Actions to Accelerate Microgrid Deployment and Related Resiliency Solutions (June 17, 2020) (hereinafter “D. 20-06-017”).</p>	
<p>1. Staff Proposal 1: As described in D.20-06-017, Proposal 1 considered various options for using pre-approved designs in the interconnection approval process to expedite approvals and aide resiliency efforts in preparation for wildfires. CforAT, along with several other parties, supported staff’s Option 1 (requiring the utilities to informally consult with industry to create single line diagrams) and Option 2 (require the utilities, along with stakeholders, to convene a working group to develop single line diagrams), but didn’t support Option 3 (require utilities to develop a review process). The Commission agreed and adopted Options 1 and 2.</p>	<p>D.20-06-017 at pp. 14-15 (outlining staff’s proposed options).</p> <p>CforAT Comments at pp. 2-5.</p> <p>See D.20-06-017 at p. 17 (discussing parties’ comments on Proposal 1), citing CforAT Comments at p. 3.</p> <p>See D.20-06-017 at pp. 23-24 (adopting options 1 and 2).</p>	<p>Verified</p>
<p>2. As part of Proposal 1, the Commission is requiring the utilities to hold semi-annual workshops to collaborate with local jurisdictions in resiliency planning. The Commission cited CforAT’s Comments, along with those of the Counties of Marin,</p>	<p>CforAT Comments at pp. 19-24.</p> <p>D.20-06-017 at p. 49 (requiring the utilities invite representatives of the AFN community to their bi-annual</p>	<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>Napa and Sonoma, and CEJA, as support for the decision to direct the utilities to invite community organizations such as those that represent access and functional needs populations to the workshops.</p>	<p>workshops on resiliency), citing CforAT Comments at p. 19.</p>	
<p>3. Staff Proposal 2: Proposal 2 addressed efforts to expedite utility sign-off on installed projects. Option 1 would require the utilities to publish specific safety criteria, Option 2 would require the utilities to eliminate inspections that duplicate those by local jurisdictions, Option 3 would require the utilities to consider accepting photos or videos for inspections. CforAT, along with several other parties supported Options 1 and 2 and opposed Option 3. The Commission adopted options 1 and 3.</p> <p>CforAT, along with multiple other parties, supported staff’s proposal 2 to require the utilities to develop a resiliency project guide that will assist local jurisdictions with selecting resiliency projects designs and implementation. The Commission agreed and required that the utilities develop a resiliency project guide.</p>	<p>CforAT Comments at pp. 6-11.</p> <p>D.20-06-017 at p. 15 (outlining staff’s proposed options).</p> <p><i>See</i> D.20-06-017 at pp. 19-21 (discussing parties’ comments on Proposal 2), citing CforAT Comments at pp. 6, 9.</p> <p><i>See</i> D.20-06-017 at pp. 28-29 (adopting options 1 and 3).</p> <p>CforAT Comments at 23.</p> <p><i>See</i> D.20-06-017 at pp. 55-56 (discussing parties’ positions on Proposal 2).</p>	<p>Verified</p>
<p>4. Staff Proposal 3: Proposal 3 addresses interconnection and prioritization. In discussing staff’s Proposal 3, the Commission considered several options to accelerate interconnections for key locations. Option 1 would allow queue jumping for eligible projects.</p>	<p>CforAT Comments at 11-15, 24.</p> <p>D.20-06-017 at p. 16 (outlining staff’s proposed options).</p> <p><i>See</i> D.20-06-017 at p. 21 (discussing parties’ comments on Proposal 3), citing</p>	<p>Verified</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>Option 2 would require utilities to develop a “priority” queue for eligible projects. Option 3 would require the utilities to commit additional staff to their interconnection teams. CforAT, along with several other parties, supported Option 3 but opposed Options 1 and 2. The Commission agreed and adopted Option 3 with modifications.</p>	<p>CforAT Opening Comments at pp. 12-13.</p> <p><i>See</i> D.20-06-017 at pp. 30-32 (adopting Option 3 with modifications).</p>	
<p>5. Staff Proposal 4: CforAT, along with SBUA, concurred with staff's recommendation to delay Proposal 4 (using advanced metering infrastructure for electrical isolation) to a later track. The Commission agreed and delayed Proposal 4 to a later track in the proceeding.</p>	<p>CforAT Comments at pp. 16-17.</p> <p><i>See</i> D.20-06-017 at p. 32 (discussing delaying Proposal 4 to a later track).</p> <p>CforAT Comments on PD p. 4 (stating that while CforAT advocated for delaying Proposal 4 to a later phase, CforAT believes this proposal has promise).</p> <p><i>See also</i> Assigned Commissioner's Amended Scoping Memo and Ruling for Track 2 (July 3, 2020) at p. 4 (setting this issue for consideration in Phase 2 or 3).</p>	Verified
<p>6. Staff Proposal 5: CforAT, along with 12 other parties, CforAT supported staff's Proposal 5 (requiring creation of a separate portal for local and tribal governments). The Commission adopted Proposal 5 with modification.</p>	<p>CforAT Comments at p. 24.</p> <p><i>See</i> D.20-06-017 at p. 65 (discussing parties' positions on Proposal 5).</p>	Verified
<p>7. Staff Proposal - Local Government Proposal 1 – Outreach and Communication: CforAT supported Staff's proposal to improve information-sharing between</p>	<p>CforAT Comments at p. 19-24.</p> <p><i>See</i> D.20-06-017 at pp. 7, 56-60.</p>	Verified

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>utilities and local governments to facilitate the ability of local governments to protect the health of their communities. CforAT further supported utilities engage with local government’s resources to identify AFN customers and AFN customers’ needs.</p>		
<p>8. Staff Proposal - Local Government Proposal 2 – Resiliency Project Engagement Guide: CforAT opposed the resiliency project guides in support of improved community engagement, as communities are typically the backstop of support for AFN customers.</p>	<p>CforAT Comments at p. 19-24. <i>See</i> D.20-06-017 at pp. 7, 56-60.</p>	<p>Verified</p>
<p>9. PG&E Proposals: CforAT, along with Vote Solar, opposed PG&E’s Community Microgrid Enablement Program (CMEP). CforAT raised concerns regarding PG&E’s practices for identifying “vulnerable customers” and with PG&E’s outreach efforts. CforAT also raised concerns about PG&E’s proposal for recovering costs related to the CMEP. While the Commission adopted PG&E’s CMEP program, it did not accept the utility’s proposal for treatment of costs. Instead, the Commission required a full reasonableness review for associated costs.</p> <p>Further, the Commission explicitly agreed with the concerns raised by CforAT that PG&E had not substantially justified the extent to which its portfolio of PSPS</p>	<p><i>See</i> D.20-06-017 at p. 75 (discussing parties’ positions on CMEP).</p> <p>CforAT Comments at pp. 29-31 (discussing concerns about PG&E’s definitions and outreach efforts).</p> <p>CforAT Comments at pp. 24-27 (discussing concerns with cost recovery).</p> <p><i>See</i> D.20-06-017 at pp. 78-79 (discussing PG&E not being able to recover costs for the CMEP in a</p>	<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
mitigations would reduce the utility’s reliance on shutting off power to its customers. Therefore, the Commission did not approve PG&E’s request to recover the forecasted costs of the program in in rates through a balancing account.	balancing account), citing CforAT’s Comments at p. 27.	
10. SDG&E Proposals: CforAT expressed concerns that the costs of SDG&E’s Proposal 2 were not worth their value to medically vulnerable customers. While the Commission did not address this, CforAT added useful information to the record regarding this proposal.	CforAT Comments at p. 33.	Verified
11. SCE Proposals: CforAT commented on each of SCE’s proposals, including expressing concern that SCE’s Proposal to provide medically vulnerable customers with battery back-up power would not necessarily be helpful to all medically vulnerable customers.	CforAT Comments at p. 34.	Verified

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

	Intervenor’s Assertion	CPUC Discussion
a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?²	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified

² 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
c. If so, provide name of other parties:	CforAT’s positions generally aligned with those of CEJA. In addition, while CforAT had a different focus than TURN, our positions were similar overall. CforAT and Cal Advocates also agreed on several positions.	Verified
d. Intervenor’s claim of non-duplication:	CforAT participated selectively and focused on those issues that are directly relevant to our constituency. Even where other parties addressed the same issue, we brought an important perspective to the proceeding that is not otherwise well represented. People in the access and functional needs community are at extreme risk from extended power outages such as those associated with de-energization events, and are in need of resiliency solutions. At the same time, AFN customers often have limited incomes, and may not be able to access solutions that are purely market driven. For these reasons, CforAT’s participation in these proceedings provides a unique perspective by representing the needs and interests of AFN customers.	Noted

C. Additional Comments on Part II:

#	Intervenor’s Comment	CPUC Discussion
	The Phase 1 Decision adopts numerous recommendations put forward by CforAT. On those issues where CforAT’s recommendations were not adopted, our input still informed the Commission’s deliberations and provided important information in the record of this proceeding regarding the concerns and needs of the AFN community, supporting an award of compensation.	Noted

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
a. Intervenor’s claim of cost reasonableness: In Phase 1 of this proceeding, CforAT has focused on issues directly relevant to the needs of vulnerable/AFN customers, including specifically our constituency of IOU customers with disabilities, when evaluating the various proposals for increasing resiliency in advance of the 2020 wildfire season. CforAT did not focus on the more technical proposals, where we do not have particular	Noted

	CPUC Discussion
<p>expertise. The Phase 1 Decision addresses multiple proposals that are intended to help reduce harm to the AFN population at risk of experiencing de-energization events during the 2020 wildfire season, and CforAT was able to help refine these proposals to better meet the needs of our constituency.</p> <p>While it is difficult to assign a dollar value to the impact of a decision addressing these issues, AFN customers will benefit from improved resiliency efforts that reduce the likelihood that they will experience extended power outages, and all customers will benefit from improved resiliency efforts from the IOUs. At the same time, because the benefit to any individual customer is hard to calculate and limited in terms of direct financial calculations, the only way this constituency is represented is through CforAT’s efforts.</p> <p>In light of the importance of issues surrounding de-energization and energy resiliency to customers with disabilities and other AFN households, the compensation requested by CforAT is reasonable.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>CforAT participated effectively and efficiently in work performed in this phase of the proceeding. In particular, CforAT selectively focused on those issues that have direct relevance and impact on our constituency, and did not attempt to participate on more general and/or more technical issues.</p> <p>Additionally, as appropriate, CforAT’s Legal Director delegated work to a junior attorney with a low hourly rate (first Adrian Slipski, then Rebecca Ruff). While the junior attorneys are (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>	Noted
<p>c. Allocation of hours by issue:</p> <p>Most written submissions filed by CforAT addressed multiple substantive issues. Thus, it is difficult to separate hourly time entries by substantive issue. CforAT has thus allocated time by procedural issue, as set forth below. For the issue areas “Proposals” and “PD,” where multiple substantive issues were addressed, we provide further estimates of how our time was allocated.</p> <p style="text-align: center;">2019 Time: Kasnitz (Total Hours: 14.3)</p>	Noted

	CPUC Discussion
<p>General Participation: 5.9 hours (41%) The issue area “General Participation” includes time spent on procedural matters and time spent on activities that do not fall into the other issue categories.</p> <p>Workshop: 8.4 hours (59%) The issue area “Workshop” includes time spent preparing for an early workshop where CforAT was asked to present on the needs of community members with access and functional needs regarding widespread grid outages like PSPS, including a customer perspective on microgrids and resiliency zones. While CforAT’s counsel was unable to attend the workshop due to illness, the preparation work was reasonable, and through coordination with other parties, the concerns that CforAT sought to include at the workshop were provided.</p> <p style="text-align: center;">2020 Time: Kasnitz (Total Hours:47.8)</p> <p>General Participation: 2.9 hours (6%)</p> <p>Proposals: 30.5 hours (64%) The issue area “Proposals” includes time spent reviewing and responding to the microgrid and resiliency proposals put forward by the IOUs and the separate Staff Proposal. While the individual time records recorded by CforAT for work in responding to the proposals cannot easily be separated into different issues, we broadly estimate the following overall allocation of our time spent addressing the proposals: Pre-approved Designs: 5%; Expedited Projects: 5%; Prioritization: 10%; AMI 5%; Portal: 5%; Local Government/Community Engagement:30%; PG&E Proposals: 25%; SCE Proposals: 10%; SDG&E Proposals: 5%</p> <p>PD: 14.4 hours (30%) The issue area “PD” includes time spend addressing the Proposed Decision for Phase 1. As with the issue area “Proposals,” the individual time records recorded by CforAT cannot easily be separated into issues. We broadly estimate the following overall allocation of our time spend addressing the PD: Prioritization: 10%; AMI: 5%; Local Governments/Engagement: 50%; PG&E Proposals: 35%.</p> <p style="text-align: center;">2020 Time: Slipski: (Total Hours: 7.0 hours)</p> <p>Proposals: 7.0 hours (100%)</p> <p style="text-align: center;">2020 Time: Ruff (Total Hours: 19.1)</p> <p>PD: 19.1 hours (100%)</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	2019	14.3	\$485.00	D.20-06-050, but see note below	\$6,935.50	14.30	\$485.00 [1]	\$6,935.50
Melissa W. Kasnitz	2020	47.8	\$500.00	Anticipated 2020 COLA, but see note below	\$23,900.00	47.80	\$495.00 [2]	\$23,661.00
Adrian Slipski	2020	7.0	\$220.00	5% step increase, see note below	\$1,540.00	7.00	\$220.00 [3]	\$1,540.00
Rebecca Ruff	2020	19.1	\$190.00	New request; see note below	\$3,629.00	19.10	\$190.00 [4]	\$3,629.00
Subtotal: \$36,004.50						Subtotal: \$35,765.50		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Melissa W. Kasnitz	2020	7.7	\$250.00	½ requested hourly rate	\$1,925.00	7.70	\$247.50	\$1,905.75
Rebecca Ruff	2020	5.8	\$95.00	½ requested hourly rate	\$551.00	5.80	\$95.00	\$551.00
Subtotal: \$2,476.00						Subtotal: \$2,456.75		
TOTAL REQUEST: \$38,480.50						TOTAL AWARD: \$38,222.25		
<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. 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>								

CLAIMED			CPUC AWARD
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ³	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Melissa W. Kasnitz	1992	162679	No
Adrian Slipski	2019	325910	No

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

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Time Records (Merits and Compensation)
Comment	Kasnitz 2019 Rate: In compensation requests that included time for 2019, CforAT requested a 2019 rate for Legal Director Melissa W. Kasnitz of \$490, based on our calculation of the 2019 COLA applied to Kasnitz's 2018 Rate and rounded up. The Commission awarded Kasnitz's requested rate of \$490 in several decisions, including D.19-12-015. Subsequently, the Commission has issued additional decisions awarding compensation to CforAT including 2019 time recorded by Ms. Kasnitz with a revised rate of \$485. These decisions include D.20-06-050 and D.20-06-043. While CforAT is using this more recent rate in our calculations here, we continue to believe that an hourly rate of \$490 for Ms. Kasnitz is appropriate. If the Commission agrees, the revised compensation request for Ms. Kasnitz' time in 2019 would be \$7007.
Comment	2020 Time – Kasnitz: This estimate is based on a step increase from a 2019 rate of \$485. If the Commission returns to its use of a 2019 rate of \$490 for Ms. Kasnitz, our estimate for a COLA increase for 2020 would increase to \$505.
Comment	2020 Time – Slipski: Mr. Slipski graduated law school in 2018 and was admitted to the bar in 2019. He has an approved, post-admission rate before the CPUC for 2019 of \$210. CforAT is seeking a 5% step increase for Mr. Slipski for 2020, as an attorney with 0-2 years of experience, in accordance with the most recent Commission Resolution addressing intervenor rates (ALJ-357). CforAT has requested this rate in other proceedings, including R.18-12-005, but no 2020 rate has yet been awarded.

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

Attachment or Comment #	Description/Comment
Comment	<p>2020 Time – Ruff: The Commission has not previously awarded a rate for Rebecca Ruff. Ms. Ruff is a 2020 graduate of U.C. Davis School of Law, who has joined CforAT as a Legal Fellow. During law school, Ms. Ruff clerked during both of her summers with the Administrative Law Judge Division at the Commission, and during her third year she interned at the U.C. Davis Policy Institute for Energy, Environment, and the Economy where she assisted in preparing written comments in active Commission proceedings. Before attending law school, Ms. Ruff received a B.A. from Willamette University in Salem, Oregon in 2017. At Willamette, Ms. Ruff majored in Philosophy and gained experience with state administrative processes and energy policy through an internship at the Oregon Department of Energy. Ms. Ruff will be taking the California Bar in October of 2020, in the delayed administration of the exam due to the COVID-19 pandemic. As a law school graduate who is not yet admitted to the Bar, CforAT is requesting an hourly rate for Ms. Ruff of \$190 per hour. This is the same rate that the Commission previously adopted for Adrian Slipski for work performed after his graduation from law school but before his admission to the Bar.</p>
Comment	<p>CforAT has not included time spent since the Phase 1 Decision was issued on work to assist with or oversee the implementation of the Phase 1 requirements. CforAT anticipates that this time will be included in a future compensation request that will address subsequent phases of this proceeding.</p>

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1]	<p>Per Decision D.18-11-049, the Commission adopted a rate of \$475 for Melissa Kasnitz for 2018. Per Decision D.20-06-043, the Commission adopted a rate of \$485.00 for Melissa Kasnitz for 2019. 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:</p> <p>2018 - \$475</p> <p>2019 - $\\$475 \times 2.35\% \text{ 2019 COLA} = 11.16 + \\$475 = \\$486.16$ (Rounded to nearest \$5) = \$485</p> <p>D.20-06-050 correctly reflected the 2019 rate of \$485.00</p>

Item	Reason
[2]	<p>Utilizing our calculation methodology for 2020 - $\\$485 \times 2.55\%$ 2020 COLA = $12.37 + \\$485 = \\497.37 (Rounded to nearest \$5) = \$495</p> <p>Upon further review, 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>
[3]	Per D.21-10-010 adopted rate for Slipski in 2020 is \$220.
[4]	<p>Adopting \$190 rate for 2020. New rate based on Resolution ALJ-387 for an expert/advocate with 0-6 years of experience. Ruff graduated at UC Davis Law School in 2020. Ruff joined CforAT as a legal fellow in the same year. Ruff clerked for the PUC’s ALJ Division. She has also interned at UC Davis Policy Institute for Energy, Environmental and the Economy where she assisted in preparing comments in active commission proceedings.</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.20-06-017.
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 are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$38,222.25.

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 \$38,222.25.
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 Center for Accessible Technology 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 October 28, 2020, the 75th day after the filing of Center for Accessible Technology'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 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:	D2203021	Modifies Decision?	No
Contribution Decision(s):	D2006017		
Proceeding(s):	R1909009		
Author:	ALJ Rizzo		
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/ Disallowance
Center for Accessible Technology	8/14/20	\$38,480.50	\$38,222.25	N/A	<i>See Part III.D, CPUC Comments, Disallowances, and Adjustments above.</i>

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Melissa	Kasnitz	Attorney	\$485	2019	\$485.00
Melissa	Kasnitz	Attorney	\$500	2020	\$495.00
Adrian	Slipski	Attorney	\$220	2020	\$220.00
Rebecca	Ruff	Advocate/ Law Graduate	\$190	2020	\$190.00

(END OF APPENDIX)