

Decision 22-03-022 March 17, 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
PACIFIC INSTITUTE FOR STUDIES
IN DEVELOPMENT, ENVIRONMENT, AND SECURITY
FOR SUBSTANTIAL CONTRIBUTION TO DECISION 20-08-047**

Intervenor: Pacific Institute for Studies in Development, Environment, and Security	For contribution to Decision (D.) 20-08-047
Claimed: \$19,420	Awarded: \$19,420.00
Assigned Commissioner: Darcie L. Houck ¹	Assigned ALJs: Camille Watts-Zagha and Robert W. Haga

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	<p>This decision concludes that the Water Revenue Adjustment Mechanisms are ineffective in achieving conservation and that a Monterey-Style WRAM will better serve this purpose. In addition, the decision:</p> <ol style="list-style-type: none"> 1. directs utilities must provide analysis in their next general rate case to determine the appropriate Tier 1 rate breakpoint,
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¹ Proceeding was reassigned from Commissioner Guzman Aceves to Commissioner Houck on January 24, 2022.

	<p>2. adopts consistent terminology across low-income rate assistance programs,</p> <p>3. authorizes a pilot program to provide discounts to low-income tenants in multi-family dwellings that don't pay their water bill through the utility, and</p> <p>4. it requires standardized reporting requirements to be followed by water utilities and outlines information required to streamline consideration of 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:		
3. Date NOI filed:	September 25, 2017 (original) March 9, 2018 (supplement) May 28, 2018 (supplement)	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.17-06-024	Verified
6. Date of ALJ ruling:	06/29/2017	Verified
7. Based on another CPUC determination (specify):	N/A	
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes

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

	Intervenor	CPUC Verification
Showing of “significant financial hardship” (§ 1802(h) or § 1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	Rulemaking 17-06-024	Verified
10. Date of ALJ ruling:	January 30, 2018	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.20-08-047	Verified
14. Date of issuance of Final Order or Decision:	09/03/2020	Verified
15. File date of compensation request:	09/10/2020	Verified
16. Was the request for compensation timely?		Yes

PART II: SUBSTANTIAL CONTRIBUTION

A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059):

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>1. Sales Forecasting Pacific Institute believes it would be helpful to distinguish between short- and long-term sales forecasting. Accurate long-term water demand forecasts are essential planning tools and can help avoid costly investments in unnecessary water infrastructure. Water utilities should avoid constructing unnecessary and costly infrastructure and supplies by accurately accounting for declines in per- capita water demand.</p>	<p>D20-05-047, pp. 50-51 Further, certain factors should be included in the sales forecasting model presented by a water utility in its GRC or equivalent. While water utilities may still choose their preferred water sales forecasting model, the following factors should be incorporated into the model they choose:</p> <ol style="list-style-type: none"> 1. Impact of revenue collection and rate design on sales and revenue collection. 2. <u>Impact of planned conservation programs.</u> 3. <u>Changes in customer counts.</u> 4. <u>Previous and upcoming changes to</u> 	<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
	<p><u>building codes requiring low flow fixtures and other water-saving measures, as well as any other relevant code changes.</u></p> <p>5. Local and statewide trends in consumption, demographics, climate population density and historic trends by ratemaking area.</p> <p>6. Past Sales Trends.</p> <p>February 23, 2018 comments, pp. 12 & 16. Pacific Institute's recent work on the issue has focused on recommendations to improve the accuracy of long- term forecasts, but these recommendations are also relevant to improving medium- term sales forecasts. Water utilities should avoid constructing unnecessary and costly infrastructure and supplies by <u>accurately accounting for declines in per-capita water demand. Water use tends to decline due to passive turnover to more efficient devices, and active conservation and efficiency programs led by the water utility.</u> Managing costs prevents unnecessary rate increases to the benefit of all customers, especially low income residents.</p> <p><u>Here, we focus on incorporating the impacts of efficiency standards and codes as well as uncertainty into long-term demand forecasts because (1) these are areas of expertise for the Pacific Institute, and (2) they are not often adequately incorporated into long-range demand forecasts</u></p> <p>July 10, 2019 comments, pp. 3 To account for efficiency</p>	

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
	<p>improvements, <u>forecasters should consider the various end uses of water by examining the stock and efficiency of appliances</u> as well as behavioral aspects of water use, such as shower duration and frequency. This approach is described in detail in the Water Research Foundation's 2018 report, Integrating Water Efficiency into Long-Term Demand Forecasting.</p>	
<p>2. Low-income rate assistance programs</p> <p>Pacific Institute supports coordination between AB 401 and LIRA programs offered by CPUC. The Joint Advocates strongly support the intent of the proposal, which is to ensure that the cost of water for Essential Indoor Uses (EIU) is affordable for low-income Californians.</p>	<p>D.20-08-047, pp. 82 Lastly, we agree with the Public Advocates that <u>multi-family housing units should qualify for LIRA programs if the housing is owned by a non-profit and are for the explicit purpose of providing affordable housing to low-income residents.</u> We direct Class A water utilities with existing LIRA programs to update their eligibility to reflect this change.</p> <p>July 27, 2020 comment, pp. 8-9 In a public comment letter to the Water Board's AB 401 public process, California Housing Partnership Corporation and Pacific Institute discussed the topic of multi-family housing affordability. <u>In that letter, we identified the multifamily affordable housing sector as the most tractable for affordability programs - The nonprofit affordable housing sector would benefit greatly from discounted conservation and efficiency programs as well as bill discounts.</u></p> <p>D.20-08-047, pp. 15 <i>Coordination of Issues Between Statewide Water Legislation and Commission-Regulated</i></p>	<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
	<p><i>Water Utilities</i> The resolution of three of the scoped issues in particular will be guided by adopted or pending legislation, or regulatory processes of other California regulatory agencies.</p> <p>July 10, 2019 comment, pp.8 CforAT and Pacific Institute <u>strongly support adoption of a low-income support program for water across all water districts in California, which would require legislative action and/or coordination with other agencies such as the Water Board.</u> CforAT and Pacific Institute encourage the Commission to take all reasonable action to encourage creation of such a program. To the extent that there is no viable path to create a state-wide program, CforAT and Pacific Institute recommend that the Commission act to create a consolidated program for all water utilities subject to its jurisdiction.</p> <p>D.20-08-047, pp. 81 Accordingly, we direct California-American Water Company to file a Tier 3 advice letter, <u>within 120-days of the issuance of this decision,</u> outlining a pilot program based on AL 1221 that provides a discount to water users in lowincome multi-family through their housing providers.</p> <p>July 27, 2020 comment, pp. 10 On the process for California- American Water to develop their pilot program, we have two comments. <u>First, the Joint Advocates would support extending the timeline for California-American Water to develop their pilot program from 60</u></p>	

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
	to 120 days.	
<p>3. Water revenue adjustment mechanism</p> <p>Pacific Institute believes that better demand forecasting can assist in the stabilization of revenue to minimize impact to ratepayers and improve water affordability. Pacific Institute recommends pre-approved drought surcharges on Tier 2 and higher usage to keep revenue closely aligned with expenses.</p>	<p>D. 20-08-047, pp. 18 In addition, parties highlighted the reality that <u>drought is the new normal in California and that forecasts need to be more accurate</u> so that WRAMs can be smaller, and that the Monterey-style WRAM would provide better incentives for parties to more accurately forecast sales while still providing the utility the ability to earn a reasonable rate of return</p> <p>February 23, 2018 comment, pp. 14-15 <u>Municipal water demand varies over time in response to a variety of factors, including population, economic activity, demographics, and the implementation of conservation and efficiency measures. Water demand can change dramatically during drought and water restriction, as many utilities experienced during California's most recent drought and restrictions in 2014. Forecasts should account for the impacts of: 1. conservation and efficiency standards and codes, 2. changing economic activity, 3. expected land use changes, 4. changing water price, 5. Climate change and drought, and 6. uncertainty.</u></p>	Verified
<p>4. Consolidation</p> <p>The commission should require utilities that are consolidating involve residents meaningfully in every step of the process. In addition, potential for consolidation should be examined</p>	<p>D.20-08-047, pp. 92 These nonduplicative items proposed by both California Water Association and the Public Advocates Office of the Public Utilities Commission are approved and listed below:</p> <p><u>19. Provide copies of all notices of a</u></p>	Verified

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>in systems violating water quality standards and those that are at risk.</p>	<p><u>proposed acquisition given to affected customers.</u></p> <p>20. <u>Provide copies of all disclosures and customer notices required by Pub. Util. Code § 10061 related to the sale and disposal of utilities owned by municipal corporations.</u></p> <p>February 23, 2018 comments, pp. 6 Rather, the Commission must ensure that consolidations that involve a private company subsuming a public water district <u>meaningfully involve community residents at every stage of the process.</u> This means, at a minimum, <u>outreach to the impacted community in the language(s) spoken by residents with translated materials,</u> community meetings and workshops as necessary, exploration of feasible alternatives, presentation of effects on rates and administrative sustainability to the community, and finally a voice in determining the solution.</p> <p>D.20-08-047, pp. 97 The Public Advocates Office of the Public Utilities Commission recommended utilities be required to perform a "cross check" with the Board's most current list of drinking water systems statewide that are out of compliance with drinking water standards. However, we will remove the word adjacent from the requirement, and <u>include all types of out-of-compliance systems regardless of geographic proximity.</u></p> <p>February 23, 2018 comment, pp. 9 The CPUC should adopt a</p>	

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
	<p>requirement that <u>all regulated water utilities identify communities near their service areas that struggle with water or wastewater deficiencies</u> or unaffordability, identify feasible alternatives for solutions, and provide a publicly accessible report of those findings to the Commission.</p> <p>July 27, 2020 comment, pp. 10 The Proposed Decision is correct in stating that consolidation is a tool to remedy systems failing water quality and may also be a means of improving affordability by improving economies of scale and eliminating redundant administrative and operating costs. <u>We strongly support the consideration of consolidations outside of GRCs.</u></p>	
<p>5. Tier 1 Water Usage and Water Baselines Comments</p> <p>Pacific Institute, along with Center for Accessible Technology, supports a calculation of Essential Indoor Usage (EIU) based on household size and average usage in a water utility service area. However, average essential indoor water use in California has been declining and is currently below 55 GPCD, especially for low-income households. The Joint Advocates are not opposed to lowering the average residential bill for 55 GPCD. However, we are uncomfortable with a) mischaracterizing 55 GPCD as a reasonable approximation of</p>	<p>D.20-08-047, pp. 105 <u>Water utilities should consider and provide analysis for establishing a baseline not set below both the Essential Indoor Usage of 600 cubic feet per household per month, as stated in the Affordability Rulemaking (R.18-07-006) and the average winter use in each ratemaking district.</u></p> <p>July 10, 2019 comment, pp. 5 PI and CforAt strongly recommend that any formula assigning levels of EIU for a water district include a <u>process that allows a customer to request a variance for a larger allocation</u> based on a simple showing of why that household's essential usage is higher than average</p> <p>August 15, 2018 comment, pp. 1 <u>Exercise caution before enshrining 55 GPCD as a standard for essential</u></p>	<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
average EIU, and b) decreasing the cost of 55 GPCD by lowering the volumetric charge.	indoor <u>water use</u> . Average essential indoor water use in California has been declining and is currently below 55 GPCD. In addition, low-income households tend to be low-volume users.	

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

	Intervenor’s Assertion	CPUC Discussion
a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding? ³	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: PI participated in joint position development and lead discussion and comment development on short-term water demand forecasting, pilot programs for low-income multi-family units, and coordination with AB 401 with Leadership Counsel for Justice and Accountability, Community Water Center, Natural Resources Defense Council, and Center for Accessible Technology.		Verified
d. Intervenor’s claim of non-duplication: Pacific Institute represents customers with a concern for the environment and employs staff with technical expertise in quantitative data analysis and water management that distinguishes us from other customer advocates that are intervening in the proceeding. Pacific Institute has worked closely with Community Water Center, The Natural Resources Defense Council, and the Leadership Counsel for Justice and Accountability in the past, and closely coordinated with those organizations and Center for Accessible Technology in this proceeding in order to avoid duplication of effort. Though our interests in securing affordable drinking water for disadvantaged communities are aligned, these organizations have differing areas of expertise and represent diverse interests of different communities with distinct barriers to safe and		Noted

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

	Intervenor’s Assertion	CPUC Discussion
	affordable water. Pacific Institute coordinated with other parties to avoid duplication and, where appropriate, submitted joint comments and resolved issues ahead of formal hearings. Pacific Institute's Laura Feinstein also spoke on a panel on August 2 nd , 2019 as a part of the proceeding that discussed low income rate assistance programs.	

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
<p>a. Intervenor’s claim of cost reasonableness: Pacific Institute creates and advances solutions to the world's most pressing water challenges, such as unsustainable water management and use; climate change; environmental degradation; food, fiber, and energy production; and basic lack of access to fresh water and sanitation. Pacific Institute has significant technical, financial, and policy experience with water affordability and efficiency programs. Pacific Institute provided technical analysis on critical issues relevant to the proceeding and provided specific recommendations to maximizes benefit to residents who are struggling with unaffordable water rates while also encouraging water efficiency.</p>	Noted
<p>b. Reasonableness of hours claimed: Pacific Institute led problem-solving and comment drafting on short term water demand forecasting and ((Part II (B)(c)), participated in all workshops relating Phase 1 of this proceeding, and coordinated with other parties to avoid duplication of efforts ((Part II (B)(d)). Pacific Institute's claim is conservative for several reasons:</p> <ol style="list-style-type: none"> 1. All Pacific Institute comments were informed by the expert knowledge of our staff, curated over the organization's long history of research and engagement on issues covered in this proceeding. This request does not include hours for coordination logistics with partner organizations. It also excludes hours necessary for PI staff to become experts on low-income rate assistance programs or AB 401 (ie. Time of Use Rates). PI staff's prior knowledge of the topics in the proceeding allowed for comments to be written efficiently, without the extra cost of 	Noted

	CPUC Discussion																		
background research.																			
2. Pacific Institute worked diligently to catalyze coordination, comment letter scoping, and discussion with our partners.																			
c. Allocation of hours by issue:	Noted																		
<p>Allocation of Hours by Issue</p> <p>PI's time is allocated by issue category as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Number of Hours</th> <th>Percent of Time</th> </tr> </thead> <tbody> <tr> <td>A Affordable Rate Structures</td> <td style="text-align: center;">29</td> <td style="text-align: center;">30%</td> </tr> <tr> <td>O Organizing, Position Development, and Problem Solving with Joint Parties</td> <td style="text-align: center;">13.5</td> <td style="text-align: center;">14%</td> </tr> <tr> <td>S Sales Forecasting</td> <td style="text-align: center;">16</td> <td style="text-align: center;">16%</td> </tr> <tr> <td>L Low-Income Rate Assistance Programs</td> <td style="text-align: center;">33.5</td> <td style="text-align: center;">34%</td> </tr> <tr> <td>W Water Rate Adjustment Mechanism</td> <td style="text-align: center;">6</td> <td style="text-align: center;">6%</td> </tr> </tbody> </table>		Number of Hours	Percent of Time	A Affordable Rate Structures	29	30%	O Organizing, Position Development, and Problem Solving with Joint Parties	13.5	14%	S Sales Forecasting	16	16%	L Low-Income Rate Assistance Programs	33.5	34%	W Water Rate Adjustment Mechanism	6	6%	
	Number of Hours	Percent of Time																	
A Affordable Rate Structures	29	30%																	
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S Sales Forecasting	16	16%																	
L Low-Income Rate Assistance Programs	33.5	34%																	
W Water Rate Adjustment Mechanism	6	6%																	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Laura Feinstein	2018	41	\$170.00	Attachment 2 (Basis for Rates)	\$6,970	41.00	\$170.00 [1]	\$6,970.00
Laura Feinstein	2019	15	\$170.00	Attachment 2 (Basis for Rates)	\$2,550	15.00	\$170.00 [1]	\$2,550.00
Laura Feinstein	2020	18	\$170.00	Attachment 2 (Basis for Rates)	\$3,060	18.00	\$170.00 [1]	\$3,060.00
Sarah Diringer	2018	4.5	\$170.00	Attachment 2 (Basis for Rates)	\$765	4.50	\$170.00 [2]	\$765.00
Darcy Bostic	2020	19.5	\$150.00	Attachment 2 (Basis for Rates)	\$2,925	19.50	\$150.00 [3]	\$2,925.00
Subtotal: \$16,270.00						Subtotal: \$16,270.00		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Darcy Bostic	2020	31	\$75.00	Attachment 2 (Basis for Rates)	\$2,325	31.00 [5]	\$75.00	\$2,325.00

CLAIMED						CPUC AWARD		
Heather Cooley	2020	7.5	\$110.00	Attachment 2 (Basis for Rates)	\$825	7.50	\$110.00 [4]	\$825.00
Subtotal: \$3,150.00						Subtotal: \$3,150.00		
TOTAL REQUEST: \$19,420.00						TOTAL AWARD: \$19,420.00		

*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.

**Travel and Reasonable Claim preparation time are typically compensated at 1/2 of preparer's normal hourly rate

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

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Basis for Rates

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1]	Adopting \$170 rate for 2018, 2019, and 2020. Although Resolution ALJ-352,357, and 387 set the rate for an expert with 11 years of experience between \$180-\$315, \$170 is the rate billed by Feinstein to Pacific Institute. Feinstein has 11 years of experience in water affordability and sustainable water policy. She was a California Sea Grant Science Fellow and has been recognized by the California Senate for her service to the state. She holds a BA from UC Berkeley in anthropology and a PhD from UC Davis in ecology.
[2]	Adopting \$170 rate for 2018. Although Resolution ALJ-352 sets the rate for an expert with 8 years of experience between \$180-\$300, \$170 is the rate charged by Diringer to Pacific Institute. Diringer has 8 years of experience in water policy and management, specializing in water demand forecasting. Diringer has also worked as a research associate for a water focused NGO in Los Angeles and conducted assessments for California's Central Coast Regional Water Quality Control Board. She has a BS in Environmental Science from UCLA and a PhD in Civil and Environmental Engineering from Duke University.

Item	Reason
[3]	Adopting \$150 rate for 2018. Although Resolution ALJ-352, 357, and 387 set the rate for an expert with 0-6 years of experience between \$150-\$255, \$150 is the rate charged by Bostic to Pacific Institute.
[4]	Adopting \$220 rate for 2018, 2019, and 2020. Although Resolution ALJ-352, 357, and 387 set the rate for an expert with 13+ years of experience between \$180-\$465, \$220 is the rate billed by Cooley to Pacific Institute. Cooley has 13+ years of experience in water policy and management specializing in the relationship between water efficiency, effective water planning, and water costs. She has worked at Lawrence Berkeley Laboratory studying climate and land use change and carbon cycling. Cooley received a B.S. in Molecular Environmental Biology and a master's degree in Energy and Resources from the University of California, Berkeley.
[5]	We find 28% of Pacific Institute's request of Intervenor Compensation Claim Preparation (IComp Prep) hours to be excessive. However, since Pacific Institute is a first-time intervenor, we will not make reductions for IComp Prep at this time but note that the volume of hours for IComp Prep requested cannot be justified in the future for a claim of this amount.

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. Pacific Institute for Studies in Development, Environment, and Security has made a substantial contribution to D.20-08-047.
2. The requested hourly rates for Pacific Institute for Studies in Development, Environment, and Security's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$19,420.00.

CONCLUSION OF LAW

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

ORDER

1. Pacific Institute for Studies in Development, Environment, and Security shall be awarded \$19,420.00.
2. Within 30 days of the effective date of this decision, the California Water Service Company shall pay Pacific Institute for Studies in Development, Environment, and Security 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 6, 2021, the 75th day after the filing of Pacific Institute for Studies in Development, Environment, and Security'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 2018 jurisdictional water revenues for the 2018 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 2018 jurisdictional water revenues for the 2018 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 March 17, 2022, at San Francisco, California.

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

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:	D2203022	Modifies Decision?	No
Contribution Decision(s):	D2008047		
Proceeding(s):	R1706024		
Author:	ALJ Watts-Zagha and ALJ Haga		
Payer(s):	California Water Service Company on behalf of Class A water companies		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/ Disallowance
Pacific Institute for Studies in Development, Environment, and Security	10/10/2020	\$19,420	\$19,420.00	N/A	<i>See Part III.D, CPUC Comments, Disallowances, and Adjustments above.</i>

Hourly Fee Information

First Name	Last Name	Labor Role	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Laura	Feinstein	Expert	\$170	2018	\$170.00
Laura	Feinstein	Expert	\$170	2019	\$170.00
Laura	Feinstein	Expert	\$170	2020	\$170.00
Sarah	Diringer	Expert	\$170	2018	\$170.00
Darcy	Bostic	Expert	\$150	2020	\$150.00
Heather	Cooley	Expert	\$220	2020	\$220.00

(END OF APPENDIX)