

Decision 22-04-022 April 7, 2022

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Edison
Company (U338E) for Approval of Its Grid
Safety and Resiliency Program.

Application 18-09-002

**DECISION GRANTING COMPENSATION TO THE SMALL BUSINESS
UTILITY ADVOCATES FOR SUBSTANTIAL CONTRIBUTION TO
DECISION 20-04-013**

Intervenor: Small Business Utility Advocates	For contribution to Decision (D.): D.20-04-013
Claimed: \$97,238.07	Awarded: \$97,315.57
Assigned Commissioner: Alice Reynolds ¹	Assigned ALJ: Robert Haga

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	The Decision adopts and approves the Settlement Agreement, to which SBUA is a party, that governs Southern California Edison Company's (SCE) Grid Safety and Resiliency Program.
--	--

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:	11/15/2018	Verified
2. Other specified date for NOI:		

¹ This proceeding was reassigned from President Batjer to President Alice Reynolds on January 31, 2022

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

3. Date NOI filed:	12/14/18	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:	A.18-11-005	Verified
6. Date of ALJ ruling:	6/24/2019	Verified
7. Based on another CPUC determination (specify):		
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:	A.18-11-005	Verified
10. Date of ALJ ruling:	6/24/2019	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804I):		
13. Identify Final Decision:	D. 18-09-002	Verified
14. Date of issuance of Final Order or Decision:	4/24/2020	Verified
15. File date of compensation request:	6/23/2020	Verified and amended on June 25, 2020.
16. Was the request for compensation timely?		Yes

PART II: SUBSTANTIAL CONTRIBUTION

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

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
Overall SBUA is a signatory to the Settlement Agreement adopted by	“The work of the Public Advocates Office of the Public Utilities Commission, Small Business Utility Advocates, and The Utility Reform Network in this proceeding was helpful and persuasive, and their effective advocacy in this	Noted

<p>the Commission that represents a compromise between the active parties to resolves all issues in this Grid Safety and Resiliency Program Application (GSRP). SBUA submitted comprehensive direct expert testimony and rebuttal expert testimony, as well as engaged in discovery to develop an appropriate record and proposals to support and improve SCE’s programs SBUA also was extensively involved in the arm-length negotiations with SCE and other parties leading up to the settlement. The entering into a Settlement Agreement avoided the need for evidentiary hearings and allowed expedited resolution of the issues in this proceeding while minimizing party costs and economizing Commission resources (Decision at 8).</p> <p>SBUA submits that the Commission should find the Settlement Agreement, which favorably address a number of issues of importance to small businesses, as reflective of SBUA’s</p>	<p>proceeding is a contributing factor to the Administrative Law Judge’s recommendation that the Settlement Agreement be adopted by the Commission.” (Decision at 26.)</p> <p>“The record of this proceeding shows that the Public Advocates Office of the Public Utilities Commission, Small Business Utility Advocates, and The Utility Reform Network all actively engaged with Southern California Edison in this proceeding. The Public Advocates Office of the Public Utilities Commission, Small Business Utility Advocates, and The Utility Reform Network all filed protests to Southern California Edison’s Application timely; and raised relevant questions to test and confirm Southern California Edison’s assumptions and projections regarding the Grid Safety and Resiliency Program costs, proposed actions, accounting, and end-user rates, among other issues.” (Decision at 25-26.)</p> <p>SBUA served direct and rebuttal testimony to support its positions. (Findings of Fact (FOF) 9 and 10, p. 41.)</p> <p>“The Settlement Agreement between the parties complies with Rule 12.1(d) and is reasonable in light of the record, consistent with law and in the public interest and should be adopted.” (Conclusions of Law (COL) 2, p. 48.)</p> <p>Exh. SBUA-01 (Direct Testimony on Grid Safety of Michael Brown on behalf of Small Business Utility Advocates), served on April 23, 2019 (SBUA Direct Testimony).</p> <p>Exh. SBUA-02 (Rebuttal Testimony on Grid Safety of Michael Brown on behalf of Small Business Utility Advocates), served on May 31, 2019 (SBUA Rebuttal Testimony).</p> <p>Joint Motion of SCE, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), Coalition of California Utility Employees (CUE), SBUA,</p>	
---	---	--

<p>substantial contributions to this proceeding.</p> <p>Additional specifics on SBUA’s advocacy are detailed below.</p>	<p>and The Utility Reform Network (TURN) for Approval of Settlement Agreement, filed on July 31, 2019 (Joint Motion).</p>	
<p>1. Cost-Effectiveness: Fusing Mitigation</p> <p>D.20-04-013 adopts the multi-party settlement resolving all cost effectiveness issues and reflects a compromise of positions held by SBUA and other parties. Specifically, as to cost effectiveness, SBUA’ expert opined that adding new fuses on unfused branch lines is primarily a general system upgrade not motivated by wildfire safety and should not be a cost passed on to customers in this proceeding (SBUA Direct Testimony at 23-26; Joint Motion at 5).</p>	<p>As a result of the Settlement Agreement, SCE addressed cost-effectiveness and reduced the overall Fusing Mitigation budget by over \$11M (Settlement Agreement at A-2; Decision at 12, 28; Joint Motion at 11). “With regard to concerns about fusing, the parties settlement adopts a fuse replacement rate that is more moderate than that proposed by Southern California Edison...” (Decision at 28.)</p>	<p>Verified</p>
<p>2. HD Camera Program and Privacy</p> <p>SBUA improved efficacy and privacy protection of HD Camera program by requiring SCE establish a privacy policy and procedure for addressing concerns (Direct Testimony at</p>	<p>“The Small Business Utility Advocates opposed Southern California Edison’s proposed situational awareness proposals due to concerns about privacy and the potential redundancy with publicly available weather information.” (Decision at 13)</p> <p>In response to SBUA raising these concerns SCE agreed to develop formal privacy practices and a process for adjusting camera angles to avoid invasion of privacy from HD Camera</p>	<p>Verified</p>

<p>26-27; Joint Motion at 6).</p> <p>SBUA demonstrated that SCE’s proposal (see SCE Application at 6-7; SCE Direct Testimony at 90-93) did not describe or require that the HD Camera program be designed and operated under the guidance of professional, public fire agencies nor that information be shared with freely with those agencies to maximize public safety benefit (SBUA Direct Testimony at 27 (“From SCE’s proposal, it is not clear what input, oversight or participation, if any, CalFire would have in the program and in ensuring that is appropriate in scope and operation.”); Joint Motion at 12). SBUA was the only party identified in the Decision as addressing the question of public safety agency involvement.</p>	<p>installations (Decision at 18, 21; Settlement Agreement at 6).</p> <p>In response to SBUA’s testimony, SCE improved the decision-making process, provided an adequate record for decision and assured appropriate program design by explaining that the HD Cameras would be “deployed in conjunction with California Department of Forestry and Fire Protection (CAL FIRE) and its contract fire agencies” (Decision at 28; <i>see also</i> SCE Rebuttal Testimony at 35).</p> <p>“The settling parties also agreed to accept Southern California Edison’s situational awareness proposals on the condition that Southern California Edison develops a privacy policy with regard to the use of the HD cameras.” (Decision at 8.)</p>	
<p>3. Covered Conductors and Grid Hardening</p> <p>SBUA shed light on inadequacies in SCE’s cost estimates for undergrounding and the</p>	<p>“The Small Business Utility Advocates supported Southern California Edison’s covered conductor proposals, but sought additional undergrounding of powerlines in areas that are likely to be subject to frequent public safety power shutoff events, especially for areas with small business communities. The Small Business Utility Advocates argued that the cost</p>	<p>Verified</p>

<p>true relative cost of undergrounding as compared to covered conductor, which, if employed, would provide a permanent solution to conductor-sparked wildfires and PSPS events (SBUA Direct Testimony 11-20; SBUA Rebuttal Testimony at 10-12).</p> <p>SBUA argued that undergrounding of power lines is the most cost-effective and appropriate solution for some areas subject to high wildfire and PSPS risk due to high wind and other fire conditions or grid interconnection factors, and therefore must be considered (SBUA Direct Testimony at 19-20). The Commission decision addresses SBUA’s concerns by adopting the Settlement Agreement with SCE commitments to further consider selective undergrounding and alternative mitigation measures, including to address risks to small business.</p>	<p>difference between covered conductors and undergrounding would be less than projected in the application.” (Decision at 12.)</p> <p>SCE agreed to specifically consider undergrounding of power lines, which was not considered in the Application (Decision at 28; Decision at 7). SCE “will take into account the impact of potential public safety power shutoff events when determining where to install alternative mitigations, including undergrounding.” (Decision at 33.)</p> <p>“Southern California Edison, in deciding whether certain circuits or portions of circuits should be considered for alternative mitigation, including undergrounding, will take various factors into consideration, including the pace at which alternative mitigation can be accomplished, the feasibility and cost of alternative mitigation in particular areas, the risk of ignition posed by overhead conductor in these areas, and the possible prevention of public safety power shutoff effects on customers and users, including small businesses.” (Order, par. 8 at 51 (emphasis added).)</p> <p>“Regarding the contested grid hardening issues, the Settlement Agreement represents a reasonable compromise of the Settling Parties’ positions.” (Joint Motion, p. 11.</p>	
<p>4. Weather Tracking and Data Sharing</p> <p>SBUA obtained a commitment from SCE</p>	<p>“The Small Business Utility Advocates opposed Southern California Edison’s proposed situational awareness proposals due to concerns about privacy and the potential redundancy with</p>	<p>Verified</p>

<p>that data from Advanced Weather Tracking will be shared with researchers and government entities to improve community-wide wildfire prevention and “sharing weather data benefits the state as a whole.” (Joint Motion at 12, 6.)</p> <p>SBUA argued that SCE had not demonstrated that adequate weather information was unobtainable publicly and ratepayers needed to fund its own large-scale weather monitoring programs (SBUA Direct Testimony at 28; Joint Motion at 6). In response to SBUA testimony, SCE provided further support to adequately document that the weather reporting systems is non-redundant (SCE Rebuttal Testimony 35-38; Joint Motion at 12)</p>	<p>publicly available weather information.” (Decision at 13.)</p> <p>In response to SBUA testimony, SCE agreed to “share weather data at no cost with nonprofit organizations, academic institutions, public agencies and public safety entities in California.” (Decision at 21, 29; see also Settlement at 6; Joint Motion to Adopt Settlement Agreement at 6.)</p>	
<p>5. Cost-Effectiveness: Vegetation Management</p> <p>SBUA supported vegetation management in principle but questioned the ability of SCE to adequately perform an additional</p>	<p>“Both the Small Business Utility Advocates and TURN advocated to reduce the amount authorized for enhanced vegetation management based on the lack of a complete scope of work and the lack of demonstration that the large-scale removal of healthy vegetation would reduce ignition risk.” (Decision at 13.) “The settling parties also agree the removal of tree attachments will be accelerated to the extent possible given personnel requirements, staffing</p>	<p>Verified</p>

<p>\$118M in vegetation management over two years and recommended approximate reduction of \$50M in scope (SBUA Direct Testimony at 31-32). In response, and in conjunction with TURN’s questioning the necessity the proposed scope of tree removal, SCE agreed to significantly reduce its vegetation management budget (Joint Motion at 7).</p>	<p>availability . . .” (Id. at 17.) SCE agreed to reduce Vegetation Management budget by \$43M (Settlement at A-2).</p>	
<p>6. Improving PSPS & Reducing De-energization Impacts:</p> <p>SBUA objected to the funding of PSPS programs until SCE agreed to improved assessment of anticipated PSPS impacts on customers, including small business, and assess options for grid hardening in a manner actually calculated to reduce PSPS impacts given that discovery responses demonstrated that SCE’s proposed grid hardening program would not quantifiably be correlated with or assure any PSPS reduction (SBUA Direct Testimony at 5, 19-20; Rebuttal</p>	<p>SCE agreed to a previously unachieved degree of analytical rigor, at SBUA’s insistence, and SCE agreed to consider “the feasibility and cost of alternative mitigation in particular areas, the risk of ignition posed by overhead conductor in these areas, and the possible prevention of PSPS effects on customers and users, including small businesses. In order to determine the PSPS effects that may potentially be avoided, SCE will assess the potential source location, impact area, frequency and duration of PSPS events. SCE will use this analysis to assess the estimated number and class of customers, including small commercial customers, potentially affected by PSPS in specific locations.” (Settlement Agreement at 7; Decision at 21; FOF 31.)</p>	<p>Verified</p>

<p>Testimony at 7). SBUA negotiated specific language that was added to the Settlement Agreement.</p>		
<p>7. Cost-Effectiveness: Unspent Funds</p> <p>SBUA advocated for unspent funds to be returned to ratepayers and costs above anticipated levels be subject to reasonableness review to protect small business ratepayers (Joint Motion at 9; Settlement Agreement at A-3 and A-4).</p>	<p>“The Public Advocates Office of the Public Utilities Commission, The Small Business Utility Advocates, and TURN all opposed the two-way balancing account and reasonableness threshold as the Grid Safety and Resiliency Program activities are new or relatively untested.” (Decision at 13.) SCE “will establish a balancing account where unspent funds will be returned to ratepayers. Costs exceeding 100 percent of the settled amounts will be subject to a reasonableness review with” certain exceptions (Id. at 18).</p>	<p>Verified</p>

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

	Intervenor’s Assertion	CPUC Discussion
<p>a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?³</p>	<p>Yes</p>	<p>Yes</p>
<p>b. Were there other parties to the proceeding with positions similar to yours?</p>	<p>Yes</p>	<p>Yes</p>
<p>c. If so, provide name of other parties: TURN, Coalition of California Utility Employees (CUE)</p>		<p>Verified</p>
<p>d. Intervenor’s claim of non-duplication:</p> <p>SBUA took all reasonable steps to coordinate its efforts with other settling parties. Appendix A of the Settlement Agreement details the positions of the settling parties and documents that SBUA’s positions were largely unique and differed from other parties. To the extent there was overlap on limited issues, SBUA was careful to streamline its involvement and focus efforts on maximizing advocacy on behalf of small business ratepayers.</p>		<p>Noted</p>

³ 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>SBUA was careful 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. Although the interests of various intervenors and parties can overlap, SBUA was the only party that focused exclusively on the concerns of small business. Therefore, while other parties may have had positions that were similar to SBUA in some degrees, our perspectives and goals were necessarily different, and were supplemented, not duplicated, by efforts on common issues.</p>	
---	--

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
<p>a. Intervenor’s claim of cost reasonableness:</p> <p>SBUA actively participated in all aspects of the proceeding. On October 9, 2018, SBUA filed its protest of SCE’s application to protect and advance the interests of small business ratepayers. SBUA submitted data requests to SCE in December 2018 and May 2019, retained an expert and filed detailed direct testimony (4/23/19) and rebuttal testimony (5/31/19), negotiated extensively with SCE and other parties on the terms of settlement, coordinated with settling parties to submit a joint settlement motion (7/31/19), commented on the proposed decision (3/20/20) and ultimately significantly influenced the outcome of the proceeding thereby improving SCE’s Grid Safety and Resiliency Program.</p> <p>The Decision explicitly recognized SBUA’s substantial contributions, as detailed above, and these results merit the cost of SBUA’s participation. The settlement is beneficial because it reaches reasonable compromises among SCE and the other interested parties, including SBUA, to address contested issues. And it is reasonable to conclude that the resolution of the issues raised by SBUA in this proceeding will benefit small business ratepayers. Also, the Commission adopted Settlement Agreement authorizes total forecast of \$526.5 million, which is approximately \$55.5 million less than SCE’s initially requested forecast of \$582 million, and SBUA’s advocacy on cost effectiveness and vegetation management, for example, significantly contributed to this result.</p> <p>SBUA’s ability to participate and contribute to the proceeding was facilitated by the assembly and work of one senior lawyer, two mid-level lawyers, and an expert with various degrees of experience in the complex details of general rate case and proceedings such as this one. SBUA’s team used their collective experience and expertise to submit testimony and negotiate settlement terms, and this was a reasonable use of resources to</p>	<p>Verified</p>

<p>effectively protect and advance the interests of small commercial customers. Our efforts were appropriate considering the magnitude of SCE’s request and the potential impacts to small commercial ratepayers.</p> <p>In assessing SBUA’s substantial contribution, the Commission also should factor its desire to encourage participation of a broad range of customer interests and its policies encouraging settlement negotiations. Given the importance of grid modernization, wildfire safety, limiting unnecessary de-energization and reasonable rates, it was appropriate for SBUA to participate in this proceeding on behalf of this underrepresented customer group, and the Commission should find that SBUA’s efforts here have been reasonable and valuable.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>SBUA efficiently focused on issues not well-addressed by other parties, providing value for small business ratepayers while incurring a reasonable number of hours. SBUA devoted approximately 260 hours, which SBUA submits is a reasonable amount of time to participate in this proceeding with an assembly of a team of professionals, highly experienced in details of regulatory and utility proceedings. The more complex the proceeding, the more time is required to participate effectively, and SBUA worked diligently throughout the process to spend a reasonable and prudent amount of time on this docket.</p> <p>SBUA submits that it made significant contributions to the Decision, as documented above, 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 portion of the proceeding, which included advocacy directly related to the Decision as well as various attendant activities (e.g., negotiating with SCE and coordinating with other settling parties).</p>	<p>Verified</p>
<p>c. Allocation of hours by issue:</p> <p>SBUA has assigned the following issue codes:</p> <ol style="list-style-type: none"> 1. Cost-Effectiveness 2. Grid Hardening and Covered Conductors 3. Improving PSPS & Reducing De-energization Impacts 4. Weather Tracking and Data Sharing 5. HD Camera Program and Privacy 6. General Participation <p>SBUA submits that the categories above are well defined to allow SBUA to accurately assign hours to various tasks in its time entries. Should the Commission wish to see different information on this point or some other</p>	<p>Verified</p>

breakdown of SBUA's hourly work, SBUA requests that we be so informed and provided an opportunity supplement this request accordingly.	
--	--

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Ariel Strauss	2019	57.4	\$375	D.20-04-023	\$21,525	57.4	\$375	\$21,525.00
Ariel Strauss	2020	3.6	\$395	As above plus application of a 5% step increase; see Comment #1 below.	\$1,422	3.6	\$405 [1]	\$1,458.00
Ivan Jimenez	2018	1.7	\$185	D.19-08-026	\$314.50	1.7	\$185	\$314.50
Ivan Jimenez	2019	3.8	\$245	D.19-08-026	\$931	3.8	\$245	\$931.00
James Birkelund	2018	11.6	\$485	D.19-10-036	\$5,626	11.6	\$485	\$5,626.00
James Birkelund	2019	77.9	\$495	D.20-02-061	<u>\$38,560.50</u>	77.9	\$495	\$38,560.50
James Birkelund	2020	2	\$495	As above.	\$990	2	\$495	\$990.00
Michael Brown	2018	50.9	\$215	D.18-11-027	<u>\$10,943.50</u>	50.9	\$215	\$10,943.50
Michael Brown	2019	50.3	\$220	D.18-11-027 plus application of Res. ALJ-357 2.35% Cost of Living Adjustment for 2019.	\$11,066	50.3	\$220	\$11,066.00
Subtotal: \$91,378.50						Subtotal: \$91,414.50		
OTHER FEES								

Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Michael Brown, Expert	2018	12	\$107.5	Travel – half of requested 2019 rate	\$1,290	12	\$107.50	\$1,290.00
Subtotal: \$1,290.00						Subtotal: \$1,290.00		
INTERVENOR COMPENSATION CLAIM PREPARATION**								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Ivan Jimenez	2018	7.3	\$92.5	50% of 2018 Rate	\$675.25	7.3	\$92.50	\$675.25
Ariel Strauss	2020	8.3	\$197.5	50% of 2020 Rate	\$1,639.25	8.3	\$202.50[1]	\$1,680.75
James Birkelund	2020	5	\$247.5	50% of 2020 Rate	\$220 [2]	5	\$247.50	\$1,237.50
Michael Brown	2020	2	\$110	50% of 2020 Rate	\$675.25 [3]	2	\$110	\$220.00
Subtotal: \$3,772						Subtotal: \$3,813.50		
COSTS								
#	Item	Detail			Amount	Amount		
1.	Photocopies and Bindings	Copies of SBUA filings and hearing exhibits			\$513.65	\$513.65		
2.	Consultant Travel	Consultant expenses for prehearing conference			\$283.92	\$283.92		
Subtotal: \$797.57						Subtotal: \$797.57		
TOTAL REQUEST: \$97,238.07						TOTAL AWARD: \$97,315.57		
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate</p>								
ATTORNEY INFORMATION								

Attorney	Date Admitted to CA BAR⁴	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Ariel S. Strauss	March 2012	282230	No
Ivan R. Jimenez	December 2016	313644	No
James M. Birkelund	March 2000	206328	No

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

Attachment or Comment #	Description/Comment
Attachment 1	Time Sheet Records with Allocation of Hours by Issue
Attachment 2	SBUA direct expenses associated with D.20-04-013 (separated into consultant travel and printing of hearings exhibits)
Comment 1	<p><u>2020 Rate for Attorney Ariel S. Strauss</u></p> <p>Mr. Strauss’ rate in D.18-07-036 was set at \$375 per hour for 2019. In addition, we are asking for a 5% step increase for Mr. Strauss, resulting in a 2020 rate in this case of \$395 per hour (375*1.05, rounded to the nearest five, per D.13-05-009). Resolutions ALJ-357 states: “It is reasonable to allow individuals an annual ‘step increase’ of 5%, twice within each experience level and capped at the maximum rate for that level, as authorized by D.07-01-009.” Mr. Strauss who is in the 8-12 years of experience bracket has not yet received any step increases in this experience level.</p>

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1]	We have applied the first 5% step increase to Ariel Strauss’ 2019 rate of \$375.00, bringing the 2020 rate to \$395.00. We have also applied the 2.55% COLA, per Res. ALJ-387, bringing Ariel Strauss’ 2020 rate to \$405.00 after rounding to the nearest \$5 per D.08-04-010.
[2]	Birkelund’s Intervenor Compensation Claim Preparation total is listed as \$220. The correct total is \$1,237.50.

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

[3]	Brown’s Intervenor Compensation Claim Preparation total is listed as \$675.25. The correct total is \$220.00.
-----	---

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. Small Business Utility Advocates has made a substantial contribution to D.20-04-013.
1. 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.
2. The claimed costs and expenses are reasonable and commensurate with the work performed.
3. The total of reasonable compensation is \$97,315.57.

CONCLUSION OF LAW

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

ORDER

2. Small Business Utility Advocates shall be awarded \$97,315.57.
3. Within 30 days of the effective date of this decision, Southern California Edison Company shall pay Small Business Utility Advocates 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 September 6, 2020, the 75th day after the filing of Small Business Utility Advocates’ request, and continuing until full payment is made.

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

This decision is effective today.

Dated April 7, 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:	D2204022	Modifies Decision?	No
Contribution Decision(s):	D2004013		
Proceeding(s):	A1809002		
Author:	ALJ Robert Haga		
Payer(s):	Southern California Edison Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Small Business Utility Advocates	June 23, 2020	\$97,238.07	\$97,315.57	N/A	See CPUC Comments, Reductions and Disallowances

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Ivan	Jimenez	Attorney	\$245	2019	\$245
Ariel	Strauss	Attorney	\$375	2019	\$375
Ariel	Strauss	Attorney	\$395	2020	\$395
James	Birkelund	Attorney	\$485	2018	\$485
James	Birkelund	Attorney	\$495	2019	\$495
James	Birkelund	Attorney	\$495	2020	\$495
Michael	Brown	Expert	\$220	2019	\$220

(END OF APPENDIX)