

Decision 22-08-018 August 4, 2022.

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of SOUTHERN CALIFORNIA
GAS COMPANY (U904G) for adoption of its
2020 Flex Alert Marketing Campaign.

Application 19-11-018

**GRANTING COMPENSATION TO THE NATIONAL DIVERSITY COALITION
FOR SUBSTANTIAL CONTRIBUTION TO
DECISION 20-12-026**

Intervenor: National Diversity Coalition	For contribution to Decision (D.) D.20-12-026
Claimed: \$14,347	Awarded: \$14,347.00
Assigned Commissioner: Alice Reynolds ¹	Assigned ALJ: Brian Stevens

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	Decision D.20-12-026 denied Southern California Gas Company's (SoCalGas) request for rate recovery of costs incurred during the 2018 and 2019 iterations of the Flex Alert paid campaign. The Final Decision also rejected SoCalGas's proposal for 2020 Flex Alert paid media campaign.
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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:	February 13, 2020	Verified
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	March 13, 2020	Verified
4. Was the NOI timely filed?		Yes

¹ This PD was reassigned to President Alice Reynolds on June 27, 2022.

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

	Intervenor	CPUC Verification
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.17-10-007 et. al	Verified
6. Date of ALJ ruling:	April 26, 2018	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:	A.17-10-007 et. al; A.19-11-018	Verified
10. Date of ALJ ruling:	November 13, 2018; October 09, 2020	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.20-12-026	Verified
14. Date of issuance of Final Order or Decision:	12/21/2020	Verified
15. File date of compensation request:	02/19/2021	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. Effective Participation and Procedural Matters (EP/PROC)</p> <p>National Diversity Coalition (NDC), reviewed testimony and filings, filed protest, motions, identified issues, issued discovery and submitted comments and recommendations.</p> <p>NDC reviewed the utility’s application, identified concerns</p>	<p><i>Protest of The National Diversity Coalition</i> (12/23/2019) (“Protest”)</p> <p><i>Motion of The National Diversity Coalition to Modify the Proceeding Schedule in The February 26, 2020 Assigned Commissioner’s Scoping Memo And Ruling</i> (03/03/2020) (“Motion”)</p> <p><i>Comments of The National Diversity Coalition on The Proposed Decision of Administrative Law Judge Stevens</i> (12/02/2020) (“Comments on PD”)</p>	Verified

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>regarding specific program aspects, and substantially contributed to the final decision by identifying issues of cost effectiveness and providing analysis of the impact of Flex Alert campaign over LMI communities.</p> <p>Although not all of NDC’s recommendations were adopted in the Final Decision, NDC’s perspectives and analyses led to more robust review of the request, contributing to the overall reasonableness of the final decision.</p> <p>Low-income and minority ratepayers benefited from NDC’s advocacy in this proceeding because these groups are the most impacted by any rate increases, and yet these communities have the least capacity and resources to engage in Commission proceedings to make their voices heard. Therefore, it is essential that NDC highlights the needs and perspectives of low-income and minority ratepayers in Commission proceedings.</p> <p>As in every case, NDC’s participation also entailed a significant amount of work to review and research issues and address procedural matters that may not directly provide evidence of outcomes in the</p>	<p><i>Reply Comments of The National Diversity Coalition on The Proposed Decision of Administrative Law Judge Stevens (12/07/2020) (“Reply Comments on PD”)</i></p> <p><i>D.20-12-026, Decision Denying Southern California Gas Company’s 2020 Flex Alert Campaign and Cost Recovery Request (12/21/2020) (“Decision” or “Final Decision”)</i></p>	

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>final decision, but were nonetheless essential for effective participation in the overall case.</p>		
<p>2. Impact on Energy Conservation (IMPACT)</p> <p>NDC argued for the need to review the impact and effectiveness of the Flex Alert campaign. NDC highlighted the lack of substantial evidentiary data that could demonstrate any benefits of the Flex Alert program to the public.</p> <p>--</p> <p>The Final Decision acknowledges and reviews the analysis and arguments put forth by NDC and finds that the Flex Alert campaign does not have substantial evidence to show significant impact of the campaign on energy conservation.</p>	<p>“NDC has concerns as to whether the Flex Alert Campaign has been effective in achieving its goals of curtailing energy usage during times when demand may exceed supply. It appears from SoCalGas’ own evaluation of the program as well as from prior third-party reports that reductions in customer usage of energy in response to Flex Alert notifications has been extremely low.” – Protest at 4.</p> <p>“NDC fully supports the denial of the 2020 Flex Alert program, as the record does not provide evidence demonstrating that the program is effective or that the proposed costs are reasonable. ... There is insufficient evidence to support a determination that the 2020 Flex Alert campaign is reasonable.” – Comments on PD at 2.</p> <p>--</p> <p>As NDC stated in its protest, “[i]t appears from SoCalGas’ own evaluation of the program as well as from prior third-party reports that reductions in customer usage of energy in response to Flex Alert notifications has been extremely low.” – Final Decision at 5.</p> <p>“The record of the Application and protest of the NDC both strongly suggest, as discussed in section 3, that the benefits of the Flex Alert paid media campaigns that SoCalGas has designed do not provide clear impact of energy</p>	<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
	<p>conservation, especially for the ratepayers of this natural gas utility.” – Final Decision at 6-7.</p>	
<p>3. Cost Estimates (EST)</p> <p>NDC analyzed the cost effectiveness of the 2020 Flex Alert campaign and argued that the recorded costs for the campaign had been substantially lower in past years and do not justify the increased budget requested for the 2020 Flex Alert campaign.</p> <p>--</p> <p>The Commission acknowledges and discussed arguments that NDC put forth. The Final Decision denies SoCalGas’s application for cost recovery of the 2020 Flex Alert paid media campaign.</p>	<p>“Costs incurred for the Flex Alert Campaign in 2016 were \$4.83M, then decreased to almost half that amount over the next 3 years, accounting for an estimated \$2.83M by 2019. SoCalGas’s proposal for 2020 Flex Alert Campaign projects an increased budget of \$3.3 million, which does not appear justified in light of recent low and decreasing recorded costs.” – Protest at 4.</p> <p>“Even with restrictions on withdrawals, SoCalGas is now better able to meet energy demand. Under the current scenario, it is likely that the Flex Alert Campaign is no longer as necessary as it was in previous years to address situations of supply shortages and hence, the higher budget estimate for 2020 seems more unreasonable.” – Protest at 5.</p> <p>“Additionally, annual costs for the Flex Alert program have decreased substantially from 2016 to 2019, undercutting the reasonableness of the increased budget requested for 2020.” – Comments on PD at 2.</p> <p><i>See Also Comments on PD at 2.</i></p> <p>--</p> <p>“Absent evidence of an effective conservation program for SoCalGas, the 2020 iteration of the Flex Alert paid media campaign as designed and proposed, including program</p>	<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
	implementation and cost recovery, is denied.” – Final Decision at 7.	
<p>4. COST RECOVERY (RECOV)</p> <p>NDC identified and researched the issue of cost recovery for the 2018 and 2019 iterations of the Flex Alert Paid media campaign. NDC agreed with the Commission’s reasoning of 2018 and 2019 cost recovery application being premature. NDC also recommended that the Commission affirmatively state that cost recovery requests for the Flex Alert campaign should not be made by SoCalGas in future Flex Alert applications.</p>	<p>“NDC intends to research into the following additional areas of concern: ...2. Whether it is reasonable to allow cost recovery for the 2018 and the 2019 Flex Alert Campaign recorded costs, given the lack of effectiveness and benefit to ratepayers.” – Protest at 5.</p> <p>“SoCalGas’ request to recover 2018 and 2019 Flex Alert costs in this application is premature, and as a matter of law and Commission precedent, cost recovery for Flex Alert campaigns should not be considered outside a proceeding examining the overall costs and causes of the Aliso Canyon leak. While the PD appropriately denies the request for recovery of 2018 and 2019 Flex Alert costs without prejudice, the PD should affirmatively state that it would not be appropriate to again request cost recovery of prior campaigns in any future Flex Alert application.” – Comments on PD at 2-3.</p> <p>“Affirmative direction to SoCalGas on this point is necessarily to clarify the issue, as the direction already given in D.16-04-039 was insufficient. In the instant application, SoCalGas acknowledged that “consistent with the language in Decision (D.)16-04-039” they would not seek costs associated with the 2016 and 2017 Flex Alert Campaigns, yet that knowledge did not deter them from seeking recovery of 2018 and 2019 campaign costs. Affirmatively directing SoCalGas not to request cost recovery for prior campaigns in future Flex Alert</p>	Verified

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>--</p> <p>The Final Decision rejects the cost recovery for the 2018 and 2019 iterations of the Flex Alert paid media campaign. While the Commission did not adopt NDC’s recommendation to direct SoCalGas not to request cost recovery for prior campaigns in the future Flex Alert applications, it recognized that the issue should be re-considered after investigations are complete.</p>	<p>applications will avoid unnecessarily relitigating this issue.” – Comments at PD at 3.</p> <p><i>See Also Comments on PD at 3-6.</i></p> <p>“Any future evaluation of 2016-2019 Flex Alert campaign costs must be considered in proceedings that comprehensively consider the causes of the Aliso Canyon gas leak. Because it is unclear at this time if there will be any Flex Alert campaigns that are required related to the August 2020 outages, or any additional Flex Alert campaigns related to Aliso Canyon, or what proceedings will evaluate these larger issues, NDC continues to recommend simply that the final decision affirmatively direct SoCalGas not to request Flex Alert cost recovery in applications for Flex Alert campaigns.” – Reply Comments on PD at 3.</p> <p><i>See Also Reply Comments on PD at 2-3.</i></p> <p>--</p> <p>“At the moment, the issue of whether rate recovery for the 2018 and 2019 iterations of the SoCalGas Flex Alert paid media campaign is not ripe for consideration. It is more appropriate for this to be considered once the Commission makes final findings in Investigation 19-06-016 that can be considered in conjunction with the direction the Commission issued in D.16-04-039.” – Final Decision at 8.</p>	

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?	No	Verified
b. Were there other parties to the proceeding with positions similar to yours?	No	Verified
c. If so, provide name of other parties:		
d. Intervenor’s claim of non-duplication:		

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>NDC is seeking approximately \$14,347 as the reasonable cost of our participation in the proceeding. Our analysis of the reasonableness of the utility’s request and recommendations on issues that impact underserved ratepayers helped the Commission craft a decision that focuses greater resources toward communities that are actually burdened by pollution and poverty while reducing unreasonable costs and expenses for all ratepayers.</p> <p>For the most part, NDC cannot calculate precisely the exact monetary benefits to ratepayers from these advocacy efforts, given the nature of the issues addressed and the fact that the proposed Flex Alert program has been denied for future implementation. However, our analysis and recommendations directly contributed to the \$3.3 million reduction in 2020 Flex Alert program costs from the original application and reduced unreasonable costs. As such, our requested compensation is a small fraction of the value of the savings, efficiencies, and benefits attributable to our advocacy, and should be found reasonable.</p>	Noted
<p>b. Reasonableness of hours claimed:</p> <p>This claim for compensation includes 52.10 total hours for NDC attorneys, experts and paralegals. NDC submits that this is a reasonable amount of time, given the scope of this proceeding and the issues examined. The hours claimed were devoted to research and analysis, review of application and</p>	Noted

	CPUC Discussion
<p>testimony, filing comments, participation in all hearings, as well as other procedural matters.</p> <p>The vast bulk of the work was handled by Director of Legal Advocacy Tadashi Gondai. To reduce duplication of efforts and increase efficiency, Mr. Gondai took primary responsibility for the case.</p> <p>Senior Paralegal Prachi Kohli provided limited support, primarily on drafting Protest to the Application and the I-comp claim. Her hours have been reduced to reflect time spent on instruction and teaching, and reflect her efforts that were directly related to the proceeding. The time she spent working on this case results in lower costs than if Mr. Gondai had done the work at his higher hourly rate.</p> <p>NDC has made voluntary reductions for time spent investigating issues and developing recommendations that were ultimately not pursued, or were not discussed in the final decision. However, some time is still legitimately claimed for the necessary steps of reviewing the Application from the utility, reasonably researching, and presenting comments for Commission consideration, as these efforts led to a more well-reasoned and better supported final decision.</p> <p>NDC submits that the requested hours are reasonable, both for each attorney and senior paralegal, and in the aggregate. Therefore, NDC seeks compensation for all hours recorded by our attorneys and senior paralegal as submitted in this claim.</p> <p><u>Compensation Request Preparation Time:</u> NDC is requesting compensation for 9 hours devoted to the preparation of the compensation request, and an additional 1.20 hours for the preparation of the initial Notice of Intent to Claim Compensation. This number of hours is reasonable in light of the nature of the proceeding and the amount of time spent in preparing the claim.</p> <p>Ms. Kohli reviewed timesheets, emails, filings, motions, comments, and decisions in order to properly allocate time by issue. She also reviewed I-Comp claim procedures and prior I-Comp decisions to determine what work could be appropriately claimed, and omit hours spent on work that did not contribute to the final decision, or exceeded normal time allotments for similar activities.</p> <p>The Commission should find that the hours claimed are reasonable.</p>	

	CPUC Discussion																
<p>c. Allocation of hours by issue:</p> <p>Effective Participation (EP) – 30.7%: time and effort not tied to single specific issues, but which was nonetheless essential to effective participation, such as analyzing and reviewing Application and comments for relevant issues and discussing position and strategy.</p> <p>Procedural (PROC) – 19.1%: time and effort spent preparing and engaging in conferences and hearings, researching and advocating for legal standards, and addressing other procedural requirements.</p> <p>Coordination (COOR) – 0.8%: time and effort spent coordinating with other parties and organization and reducing duplication while supplementing common positions.</p> <p>Impact on Energy Conservation (IMPACT) – 13.9%: research and advocacy on the impact and effectiveness of the Flex Alert paid campaign.</p> <p>Cost Estimates (EST) – 13.9%: research and advocacy on the appropriate budget and cost estimates for the program.</p> <p>Cost Recovery (RECOV) – 18.7%: research and advocacy on the reasonability of the cost recovery for past programs.</p> <p>Discovery (DISC) – 2.9%: time and effort spent on research, drafting, and reviewing data requests and responses.</p> <table data-bbox="186 1039 470 1333"> <tr> <td>EP</td> <td>– 30.7%</td> </tr> <tr> <td>PROC</td> <td>– 19.1%</td> </tr> <tr> <td>COOR</td> <td>– 0.8%</td> </tr> <tr> <td>IMPACT</td> <td>– 13.9%</td> </tr> <tr> <td>EST</td> <td>– 13.9%</td> </tr> <tr> <td>RECOV</td> <td>– 18.7%</td> </tr> <tr> <td>DISC</td> <td>– 2.9%</td> </tr> <tr> <td colspan="2">Total: 100%</td> </tr> </table>	EP	– 30.7%	PROC	– 19.1%	COOR	– 0.8%	IMPACT	– 13.9%	EST	– 13.9%	RECOV	– 18.7%	DISC	– 2.9%	Total: 100%		<p>Noted</p>
EP	– 30.7%																
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IMPACT	– 13.9%																
EST	– 13.9%																
RECOV	– 18.7%																
DISC	– 2.9%																
Total: 100%																	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Tadashi Gondai	2019	5.50	\$350	D. 20-05-033, ALJ-357	\$1,925.00	5.50	\$350.00	\$1,925.00
Tadashi Gondai	2020	26.60	\$360	See Comment #4	\$9,576.00	26.60	\$360.00 [1]	\$9,576.00
Subtotal: \$11,501						Subtotal: \$11,501.00		
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 \$
Prachi Kohli	2019	10.50	\$105	See Comment #5	\$1,102.50	10.50	\$105.00 [2]	\$1,102.50
Prachi Kohli	2020	9.50	\$110	See Comment #5	\$1,045.00	9.50	\$110.00 [3]	\$1,045.00
Subtotal: \$2,147.5						Subtotal: \$2,147.50		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Tadashi Gondai	2020	0.20	\$180	\$360/2, See Comment #4	\$36.00	.20	\$180.00	\$36.00
Prachi Kohli	2020	1.00	\$55	\$110/2, See Comment #5	\$55.00	1.00	\$55.00	\$55.00
Prachi Kohli	2021	9.00	\$67.5	\$135/2, See Comment #5	\$607.50	9.00	\$67.50 [4]	\$607.50
Subtotal: \$698.50						Subtotal: \$698.50		
COSTS								
#	Item	Detail			Amount	Amount		
	Office and Travel expenses	NDC is not claiming any costs in this request for printing, postage, travel, or other office expenses. NDC utilized e-document readers, e-mail, phone, and conference calls to reduce printing, filing, and meeting costs and to minimize overall costs, adding to the reasonableness of our claim.			\$0.00	\$0.00		
TOTAL REQUEST: \$14,347						TOTAL AWARD: \$14,347.00		

*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. 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.

**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer’s normal hourly rate

ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ³	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Tadashi Gondai	Dec 3, 2010	273186	No

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

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Timesheets of NDC Attorneys and Senior Paralegal
Attachment 3	Resume of Prachi Kohli
Comment 4	<p>For Mr. Gondai’s 2020 hourly rate, pursuant to ALJ-387 (10/26/2020) NDC requests the application of the 2020 COLA (2.55%). D.20-05-033 set Mr. Gondai’s 2019 rate at \$350/hr, reflecting his 6.5 years of relevant experience</p> $\$350 * 1.0255 = \358.93 <p>Rounded to the nearest five-dollar increment, Mr. Gondai’s 2020 rate should be set at \$360/hr which is the high end of the range for attorneys with 5-7 years of experience, appropriately reflecting 7.5 years of relevant experience. In the 5-7 years experience tier, Mr. Gondai has previously only requested one of his two allotted 5% step-increases, further justifying this 2020 rate request.</p> <p>Mr. Gondai has current pending requests for a 2020 rate of \$360/hr in Intervenor Compensation claims for the National Asian American Coalition (NAAC) in proceedings A.18-06-015 and R.18-07-006, and for the National Diversity Coalition (NDC) in A.18-12-009.</p>
Comment 5	The Commission has not yet determined a rate for Ms. Prachi Kohli. NDC (through NAAC) submitted a pending I-Comp requests in R.18-07-006 on

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
	<p>9/21/2020 and A.18-06-015 on 11/2/2020 with the same request for Ms. Kohli's 2020 rate as is being made here.</p> <p>NDC requests that Ms. Kohli's rate be established at \$105 an hour for 2019, \$110 an hour for 2020 and \$135 an hour for 2021. Given the complexity of the issue areas she was dealing with and her professional qualifications, NDC asserts that these rates are more than justified.</p> <p>Ms. Kohli's requested compensation "take[s] into consideration the market rates paid to persons of comparable training and experience who offer similar services," (see PUC § 1806) and is in accordance with the Commission's guidelines in D.05-11.031, Resolution ALJ-393 (12/22/2020) and the 2021 hourly rates adopted for the year 2021.</p> <p>Ms. Kohli has been working with NDC, particularly on CPUC proceedings for more than a year. She has been responsible for legal research and drafting and has been actively contributing by reviewing proposals, testimony and comments, coordinating and working with attorneys to draft testimony, comments, attending hearings, writing briefs and drafting comments and completing intervenor compensation claims on behalf of NDC for active proceedings before the CPUC.</p> <p>Ms. Kohli holds a Bachelor of Laws and Bachelor of Business Administration from Symbiosis International University, India and also a Master of Laws with specialization in Business Laws from UCLA School of Law.</p> <p>Ms. Kohli has also interned with other non-profit organizations in California and has worked as an Intern under a Superior Court Judge for the county of Los Angeles. Previously, she has worked as a Legal Associate for 2 years with law firms in India and holds an active license to practice law as an Advocate in India.</p> <p>She has extensive experience in legal research and writing and has represented corporate clients before courts and tribunals in India. She has worked with Senior Advocates of the Supreme Court of India and High Courts. She also has experience working with various governmental and private organizations and law firms in India, including the ONGC Videsh Limited, a Public Sector Enterprise of the Government of India and the international arm of Oil and Natural Gas Corporation Limited (ONGC), the national oil company of India.</p> <p>Although this is a first request for a rate as a Senior Paralegal for intervenor compensation, Ms. Kohli has sufficient experience in the legal field. The requested rates are at the low end of the range comparable to other personnel working with similar educational backgrounds such as Legal Fellow/ Law Clerk/ Paralegal Manager and who receive current rate in the range of \$114-\$190.</p> <p>Given her advocacy experience, her law degree, legal research background and</p>

Attachment or Comment #	Description/Comment
	duties with NAAC, we believe the rates requested for 2019, 2020 and 2021 are justified and we ask that these rates be approved.

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1]	Per D.22-02-014, adopted rate for Gondai in 2020 is \$360.
[2]	Adopting \$105 rate for 2019. New rate based on ALJ Resolution-357 for an expert with 0-6 years of experience. Kohli has been working for NAAC for a year working on their legal research and has been reviewing proposals, testimonies, comments and as well as coordinating and working with attorneys to draft testimonies. Kohli has a Bachelor of Laws degree from Symbiosis International University, India, and a Master of Laws with specialization in Business Laws from UCLA School of Law
[3]	Per D.22-01-014, adopted rate for Kohli in 2020 is \$110.
[4]	Adopting \$135 rate for 2021. Kohli has over two years of experience in legal research. According to Market Rate Study ALJ-393, Kohli qualifies for a rate in the highest range for an Advocate/Paralegal II.

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©)

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. National Diversity Coalition has made a substantial contribution to D.20-12-026.
2. The requested hourly rates for National Diversity Coalition’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 \$14,347.00.

CONCLUSION OF LAW

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

ORDER

1. National Diversity Coalition is awarded \$14,347.00.
2. Within 30 days of the effective date of this decision, Southern California Gas Company shall pay National Diversity Coalition 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 May 5, 2021, the 75th day after the filing of National Diversity Coalition'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 August 4, 2022, at Sacramento, California.

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

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D2208018	Modifies Decision?	No
Contribution Decision(s):	D2012026		
Proceeding(s):	A1911018		
Author:	ALJ Brian Stevens		
Payer(s):	Southern California Gas Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
National Diversity Coalition	02/19/2021	\$14,347	\$14,347.00	N/A	See 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
Tadashi	Gondai	Attorney	\$350	2019	\$350.00
Tadashi	Gondai	Attorney	\$360	2020	\$360.00
Prachi	Kohli	Senior Paralegal	\$105	2019	\$105.00
Prachi	Kohli	Senior Paralegal	\$110	2020	\$110.00
Prachi	Kohli	Senior Paralegal	\$135	2021	\$135.00

(END OF APPENDIX)