

Decision 23-11-028 November 2, 2023

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Address
Energy Utility Customer Bill Debt
Accumulated During the COVID-19
Pandemic.

Rulemaking 21-02-014

**DECISION GRANTING COMPENSATION TO LEADERSHIP
COUNSEL FOR JUSTICE AND ACCOUNTABILITY FOR
CONTRIBUTIONS TO DECISIONS 21-02-036 & 22-04-037**

Intervenor: Leadership Counsel for Justice and Accountability (LCJA)	For contribution to Decision (D.) D.21-06-036 and D.22-04-037
Claimed: \$63,197.50	Awarded: \$48,588.75
Assigned Commissioner: Darcie L. Houck	Assigned ALJ: Camille Watts-Zagha

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	<p>Decision (D.) 21-06-036 suspended disconnections of energy service for customers with energy bill debt an additional three months until September 30, 2021, authorized mandatory automatic enrollment of residential customers with arrearages into standardized pandemic specific payment plans, documented the status of residential and small business arrearages connected to the COVID-19 pandemic, created and authorized “COVID-19 Relief Payment Plans” with two-year terms and two waivers for missed payments, de facto deferred customers participating in payment plans risk of disconnection to after December 1, 2021, authorized “COVID-19 Relief Payment Plans” for small businesses, documented federal and state funds available for energy arrearages and required the creation of a map of community based organizations (CBOs) in utility service territories to support CBO assisted relief and outreach.</p> <p>D.22-04-037 provided a framework to establish and operate a Community Based Organization (CBO) Case Management</p>
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	Pilot Program (CBO Pilot). The decision ordered the establishment of a CBO Pilot Working Group to guide and oversee the development of the program, including selection of the CBOs in the targeted communities. The decision also required the CBO Pilot Working Group to consider and propose a budget, payment structure, criteria to target communities, and evaluation methods for the CBO Pilot.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Public Utilities (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:	March 8, 2021	Verified
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	April 6, 2021	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 Administrative Law Judge (ALJ) ruling issued in proceeding number:	Rulemaking (R.) 13-02-008	Verified
6. Date of ALJ ruling:	January 9, 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:	R.15-03-010, R.13-02-008	Verified
10. Date of ALJ ruling:	January 18, 2018 January 9, 2019	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes

¹ All statutory references are to California Pub. Util. Code unless indicated otherwise.

	Intervenor	CPUC Verification
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.22-04-037	Verified
14. Date of issuance of Final Order or Decision:	April 18, 2022	Verified
15. File date of compensation request:	June 17, 2022	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><u>D.21-06-036</u></p> <p>1. Disconnections Moratorium Extension: LCJA argued the Commission must extend the disconnections moratorium and ensure emergency pandemic specific disconnections protections.</p>	<p>1. Joint Opening Comments of LCJA and Greenlining (March 3, 2021), pp. 2, 7, 9-10; Joint Comments of CEJA, LCJA and Greenlining on ALJ Ruling Inviting Post-Workshop Questions (April 12, 2021), pp. 1-6, 11-12; Opening Brief of CEJA, LCJA and Greenlining (April 23, 2021), pp. 3-9; Reply Brief of CEJA, LCJA and Greenlining (April 30, 2021), pp. 2-6; Joint Opening Comments of CEJA, LCJA and Greenlining on Proposed Decision (June 14, 2021), pp. 1-5.</p> <p>D.21-06-036 stated, the Decision, “suspends disconnections for three more months,” p. 2; “we are suspending disconnections of all customers for three months,” p. 32.</p>	Verified
A. LCJA argued existing disconnections protections while significant did not sufficiently mitigate harms of the pandemic.	A. Joint Opening Comments of LCJA and Greenlining (March 3, 2021), pp. 8-11; Joint Comments of CEJA, LCJA and Greenlining on ALJ Ruling Inviting Post-Workshop Questions (April 12,	

	<p>2021), pp. 11-12; Opening Brief of CEJA, LCJA and Greenlining (April 23, 2021), pp. 7-11; Reply Brief of CEJA, LCJA and Greenlining (April 30, 2021), pp. 5-7; Joint Opening Comments of CEJA, LCJA and Greenlining on Proposed Decision (June 14, 2021), pp. 1, 5-6.</p> <p>D.21-06-036 approved “COVID-19 Relief Payment Plans,” modifying and expanding existing arrearage management offerings, “The “COVID-19 Relief Payment Plans” we adopt add only the element of time, rather than money, to assist customers.” p. 16; ““COVID-19 Relief Payment Plans” are a temporary program,” p. 20.</p> <p>D.21-6-036 documented arrearages continuing to grow during the pandemic despite existing offerings and protections, “Arrearages remain a problem. In the OIR, we identified over \$1 billion in arrearages from IOUs’ residential customers at the end of 2020. In the first quarter of 2021, IOU residential arrearages have grown to over \$1.3 billion,” p. 9.</p>	
<p>B. LCJA argued the Commission must take emergency pandemic specific actions.</p>	<p>Joint Opening Comments of LCJA and Greenlining (March 3, 2021), p.11; Joint Comments of CEJA, LCJA and Greenlining on ALJ Ruling Inviting Post-Workshop Questions (April 12, 2021), pp. 1-4; Opening Brief of CEJA, LCJA and Greenlining (April 23, 2021), pp. 4-9; Reply Brief of CEJA, LCJA and Greenlining (April 30, 2021), pp. 5-7; Joint Opening Comments of CEJA, LCJA and Greenlining on Proposed Decision (June 14, 2021), pp. 2-5.</p> <p>D.21-06-036 approved new and temporary “COVID-19 Relief Payment</p>	<p>Verified</p>

	Plans,” p. 16.	
C. LCJA argued the Commission must extend the disconnections moratorium.	<p>Joint Opening Comments of LCJA and Greenlining (March 3, 2021), pp. 2, 7; Joint Comments of CEJA, LCJA and Greenlining on ALJ Ruling Inviting Post-Workshop Questions (April 12, 2021), pp. 11-12, Opening Brief of CEJA, LCJA and Greenlining (April 23, 2021), pp. 4, 14, 25; Reply Brief of CEJA, LCJA and Greenlining (April 30, 2021), pp. 6, 10; Joint Opening Comments of CEJA, LCJA and Greenlining on Proposed Decision (June 14, 2021), pp. 1-4.</p> <p>D.21-06-036 stated, the Decision, “suspends disconnections for three more months,” p. 2; “we are suspending disconnections of all customers for three months,” p. 32.</p>	Verified
<p>2. Equitable Debt Relief and Management and Customer Protections: LCJA argued the Commission must design relief programs and policies to reach vulnerable Californians like those in low-income households and environmental and social justice communities. LCJA argued the Commission must protect these customers in debt from discriminatory, burdensome, and expensive applications processes for accessing arrearage relief that may inadvertently exclude customers in need and intended beneficiaries.</p>	<p>Joint Opening Comments of LCJA and Greenlining (March 3, 2021), pp. 3; Joint Comments of CEJA, LCJA and Greenlining on ALJ Ruling Inviting Post-Workshop Questions (April 12, 2021), pp. 7-10; Opening Brief of CEJA, LCJA and Greenlining (April 23, 2021), pp. 14-21; Reply Brief of CEJA, LCJA and Greenlining (April 30, 2021), pp. 7-8; Joint Opening Comments of CEJA, LCJA and Greenlining on Proposed Decision (June 14, 2021), pp. 5-6; Status Conference Transcript Volume 1 (March 26, 2021), pp. 31-32, 76-77; Evidentiary Hearing Transcript Volume 1 (May 27, 2021) p. 141.</p> <p>D.21-06-036 mandated automatic enrollment into arrearage management plans, “Today’s disconnection suspension coupled with mandatory, automatic amortizations of debt will relieve customers of the threat of disconnection and put them on a path toward solvency.” p. 2.</p>	Verified

	<p>D.21-06-036 mandated automatic enrollment in part to reduce barriers to accessing relief. p. 24.</p> <p>D.21-06-036 required automatic enrollment to achieve the “goal of reaching all those eligible for relief, with a priority on ESJ or DAC or hard-to-reach,” p. 24.</p>	
<p>A. LCJA argued for automatic enrollment of customers with arrearages in debt relief and management plans. LCJA argued against income verification, means testing and other proxy requirements for accessing debt management and relief for both cost and access reasons.</p>	<p>Joint Opening Comments of LCJA and Greenlining (March 3, 2021), pp. 11; Joint Comments of CEJA, LCJA and Greenlining on ALJ Ruling Inviting Post-Workshop Questions (April 12, 2021), pp. 9-10; Opening Brief of CEJA, LCJA and Greenlining (April 23, 2021), pp. 14-21; Reply Brief of CEJA, LCJA and Greenlining (April 30, 2021), pp. 7-10; Joint Opening Comments of CEJA, LCJA and Greenlining on Proposed Decision (June 14, 2021), pp. 1-2, 4; Status Conference Transcript Volume 1 (March 26, 2021), pp. 31-32, 76-77; Evidentiary Hearing Transcript Volume 1 (May 27, 2021) p. 141.</p> <p>D.21-06-036 approved automatic enrollment for residential customers in COVID-19 specific arrearage management plans without income verification, means testing or other proxy requirements, “We agree that casting a wider net, especially for a relief program that is the lowest cost of many of the options, is the best choice.” pp. 24.</p>	Verified
<p>B. LCJA argued reaching low-income and environmental and social justice communities with arrearage relief and management requires inclusive criteria.</p>	<p>Joint Opening Comments of LCJA and Greenlining (March 3, 2021), pp. 6-8, 11-12; Joint Comments of CEJA, LCJA and Greenlining on ALJ Ruling Inviting Post-Workshop Questions (April 12, 2021), pp. 2-3, 10-11; Opening Brief of CEJA, LCJA and Greenlining (April 23, 2021), pp. 14-21; Reply Brief of CEJA, LCJA and Greenlining (April 30, 2021),</p>	Verified

	<p>pp. 7-8; Joint Opening Comments of CEJA, LCJA and Greenlining on Proposed Decision (June 14, 2021), p. 4.</p> <p>D. 21-06-036 stated, “LCJA/CEJA/Greenlining argued that reaching the hardest-to-reach necessitates inclusive criteria. We agree that casting a wider net, especially for a relief program that is the lowest cost of many of the options, is the best choice,” (p. 24).</p>	
<p>3. Program Design Recommendations to Provide Arrearage Relief to Disproportionately Impacted Low-Income, Environmental and Social Justice Communities, Disadvantaged Communities and Other Vulnerable Households:</p> <p>LCJA argued for significant debt forgiveness and management especially for residential, low-income households and environmental and social justice communities impacted by the pandemic.</p>	<p>Joint Opening Comments of LCJA and Greenlining (March 3, 2021), pp. 7-9; Joint Comments of CEJA, LCJA and Greenlining on ALJ Ruling Inviting Post-Workshop Questions (April 12, 2021), pp. 3-4; Opening Brief of CEJA, LCJA and Greenlining (April 23, 2021), pp. 11-14; Reply Brief of CEJA, LCJA and Greenlining (April 30, 2021), pp. 4-7; Joint Opening Comments of CEJA, LCJA and Greenlining on Proposed Decision (June 14, 2021), pp. 4-5. D.21-06-036 adopted automatic enrollment into “COVID-19 Relief Payment Plans.” pp. 2, 15-16, 24-26.</p> <p>D.21-06-036 stated, “The “COVID-19 Relief Payment Plans” we adopt add only the element of time, rather than money, to assist customers. By adding a portion of the debt to each monthly bill, payment plans depend upon customers’ ability to pay an amount larger than their current bill. While this proposition is likely untenable for households with the lowest incomes and highest arrearages, we expect debt enrolled in the “COVID-19 Relief Payment Plans” to shrink or be eliminated for many of these customers.” p. 16.</p> <p>D.21-06-036 meaningfully considered adding additional money as a debt</p>	Verified

	<p>forgiveness and deferred that action to the next phase of the proceeding. p. 17. D.21-06-036 stated, “In the next phase of this proceeding, we will be tracking customer access to one of the many promising programs offering significant forgiveness.” p. 17.</p>	
<p>A. LCJA argued for debt forgiveness that limits impacts on ratepayers including securing state and federal funding.</p>	<p>Joint Comments of CEJA, LCJA and Greenlining on ALJ Ruling Inviting Post-Workshop Questions (April 12, 2021), pp. 9-10; Opening Brief of CEJA, LCJA and Greenlining (April 23, 2021), pp. 12-14; Reply Brief of CEJA, LCJA and Greenlining (April 30, 2021), pp. 9-10; Joint Opening Comments of CEJA, LCJA and Greenlining on Proposed Decision (June 14, 2021), pp. 4-5; Evidentiary Hearing Transcript Volume 1(May 27, 2021) pp. 141-142. D.21-06-036 adopted automatic enrollment into arrearage relief plans because it “keeps costs down” p. 19 and “is the lowest cost of many of the options, is the best choice.” p. 24.</p> <p>D.21-06-036 considered pending state and federal relief funds when crafting emergency pandemic response actions in this Decision. pp. 2, 7.</p> <p>D.21-06-036 stated, “The actions ordered in the instant decision are intended to integrate with additional state and federally funded utility arrearage relief, anticipated to be forthcoming for residential customers in the next few months.” p. 12.</p>	Verified
<p>B. LCJA argued to defer full program design of debt forgiveness until after then pending state and federal appropriations for COVID-19 recovery</p>	<p>Joint Comments of CEJA, LCJA and Greenlining on ALJ Ruling Inviting Post-Workshop Questions (April 12, 2021), pp. 6, 12; Opening Brief of CEJA, LCJA and Greenlining (April 23, 2021), pp. 7, 13; Reply Brief of CEJA, LCJA and Greenlining (April 30, 2021), pp. 9-10; Joint Opening Comments of</p>	Verified

<p>when more required information is available.</p>	<p>CEJA, LCJA and Greenlining on Proposed Decision (June 14, 2021), pp. 4-5; Status Conference Transcript Volume 1 (March 26, 2021), p. 31.</p> <p>D.21-06-036 stated, “Once the parameters of state and federally funded utility bill arrearage relief are established, we will revisit scoped issues five and six...” p. 12.</p> <p>D.21-06-036 stated, “The next phase of this proceeding will track by how much state funding for utility bill relief shrinks the debt covered in the payment plans, and for whom.” p. 2.</p> <p>D.21-06-036 outlined pending state and federal relief and its connection to scope of issues in this proceeding. pp. 7-8.</p>	
<p>C. LCJA argued low-income, people of color, environmental and social justice communities experienced disproportionate burdens from the COVID-19 pandemic and need equitable relief.</p>	<p>Joint Opening Comments of LCJA and Greenlining (March 3, 2021), pp. 2-7; Joint Comments of CEJA, LCJA and Greenlining on ALJ Ruling Inviting Post-Workshop Questions (April 12, 2021), pp. 4-5; Opening Brief of CEJA, LCJA and Greenlining (April 23, 2021), pp. 3-7, Reply Brief of CEJA, LCJA and Greenlining (April 30, 2021), pp. 5, 7-8; Joint Opening Comments of CEJA, LCJA and Greenlining on Proposed Decision (June 14, 2021), pp. 1-2.</p> <p>D.21-06-036 stated adopting automatic enrollment was intended to reduce barriers for vulnerable customers like low-income households and those in environmental and social justice communities. p. 23-24.</p> <p>D.21-06-036 stated, “Automatic enrollment meets the goal of reaching all those eligible for relief, with a priority on ESJ or DAC or hard-to-reach or non-English speaking or medical</p>	<p>Verified</p>

	<p>baseline customers. LCJA/CEJA/Greenlining argued that reaching the hardest-to-reach necessitates inclusive criteria. We agree...” p. 24.</p> <p>D.21-06-036 stated, “We must take this same approach with COVID-19 relief, as California’s COVID impacts are documented to be exacerbating existing equity gaps.” p. 39.</p>	
<p>4. Outreach, Marketing and Education Recommendations Including Coordination with Community-Based Organizations: LCJA argued low-income and environmental and social justice communities, and disadvantaged communities require community-based and specific outreach methods, communications and notices to achieve goals of arrearage relief and management programs.</p>	<p>Joint Opening Comments of LCJA and Greenlining (March 3, 2021), p. 3; Joint Comments of CEJA, LCJA and Greenlining on ALJ Ruling Inviting Post-Workshop Questions (April 12, 2021), p. 9; Opening Brief of CEJA, LCJA and Greenlining (April 23, 2021), pp. 18-20; Reply Brief of CEJA, LCJA and Greenlining (April 30, 2021), p. 8; Status Conference Transcript Volume 1 (March 26, 2021), pp. 30-31.</p> <p>D.21-06-036 required community-based organization outreach and reporting to reduce existing inequities. pp. 38-39.</p> <p>D.21-06-036 stated, “By pairing the “COVID-19 Relief Payment Plans” with support from CBOs, customers should know how and when to make contact with their utility should they need additional help.” p. 38.</p> <p>D.21-06-036 stated, “The Commission has engaged, or directed utilities to engage, CBOs to bring specialized or niche communities to the utility programs.” p. 39.</p> <p>D.21-06-036 stated, “Utility partnerships with CBOs are an important tool in providing community-based assistance to customers in need of arrearage relief.” p. 41.</p>	Verified

	D.21-06-036 stated, “As California moves toward recovery from the impacts of the COVID-19 pandemic, we must understand working relationships between energy utilities and CBOs and ensure these networks are more robust than ever before.” p. 41.	
<p><u>D.22-04-037</u></p> <p>1. LCJA argued that the Commission must restructure the Working Group to ensure greater CBO representation and transparent process, including a CBO representative that co-leads the Working Group, CBO representatives make up at least one half of the Working Group, and the decision-making process is transparent and equitable</p>	<p>Joint Comments of CEJA and LCJA on Proposed Decision (March 24, 2022), p. 7-9.</p> <p>D.22-04-037 stated, “Pacific Gas and Electric Company (PG&E) shall convene the initial meeting of the CBO Pilot Working Group. PG&E and a CBO selected by the Working Group at the initial meeting of the CBO Pilot Working Group shall convene and co-lead the CBO Pilot Working Group thereafter.” Attachment A, p. 1.</p>	Verified
<p>2. LCJA argued that the use of isolated selection criteria, especially those for relief programs, would like exacerbate historical patterns of exclusion, surveillance, and punishment, while failing to relieve debt or prevent disconnections. The Commission should direct the Working Group to identify communities for the Pilot based on intersecting criteria and CBO expertise.</p>	<p>Joint Comments of CEJA and LCJA on Proposed Decision (March 24, 2022), p. 5.</p> <p>D.22-04-037 stated, “The Commission’s Affordability Proceeding has adopted several methods to divide California into small geographic areas and rank each area by resource levels, taking into account how much communities must spend to pay for an essential amount⁶⁸ of utility service. Both the utility bill data and demographic data are refreshed annually, and our determination relies</p>	Verified

	<p>upon the most recent data available.” p. 26.</p> <p>D.22-04-037 stated, “The CBO Pilot Working Group may consider and propose an alternative to the targeted communities listed in Attachment D. The CBO Pilot Working Group shall not require households residing in zip codes associated with the communities targeted to demonstrate their need or document their income or participation in low-income programs.” p. 27.</p>	
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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?	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Noted
c. If so, provide name of other parties: California Environmental Justice Alliance (CEJA), Greenling Institute (Greenling).		Noted
d. Intervenor’s claim of non-duplication: LCJA coordinated with CJEJA and Greenlining throughout this proceeding. The communities and interests Leadership Counsel represents in this proceeding are complimentary but distinct from those represented by CEJA and Greenling, and Public Advocates, as detailed in the notice of intent. In particular, Leadership Counsel works with many urban and rural disadvantaged communities in the San Joaquin and East Coachella Valleys, the interests of which would not have been adequately represented or considered absent Leadership Counsel’s intervention and engagement. Leadership Counsel represented the particular vulnerabilities of these communities when facing high arrearages and disconnections, the particular impacts of COVID-19, third party energy debt, and enrollment challenges that needed to be addressed in program design through automatic enrollment.		Noted

PART III: REASONABLENESS OF REQUESTED COMPENSATION**A. General Claim of Reasonableness (§ 1801 and § 1806):**

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: The decisions in this proceeding will have significant impact on disadvantaged communities in the San Joaquin Valley and Eastern Coachella Valley. The costs claimed here are reasonable in the context of the need to ensure that the interests of these disadvantaged communities that Leadership Counsel works with are properly represented in this proceeding.	Noted
b. Reasonableness of hours claimed: Work was delegated internally to ensure the level of experience was appropriate for the assigned tasks and reduce internal duplication of work.	Noted
c. Allocation of hours by issue: <ol style="list-style-type: none"> 1. Arrears Program Design: 75% 2. CBO Program Design: 9% 3. Party Coordination: 9% 4. Community Engagement: 1% 5. Intervenor Compensation Claim Preparation: 6% 	Noted

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Michael Claiborne, LCJA Directing Attorney	2021	12.6	340	ALJ-387	\$4284	12.4 [1]	\$380 [1]	\$4,712.00
Michael Claiborne	2022	0.8	350	ALJ-387	\$280	0.8	\$390 [2]	\$312.00
Jamie Katz, Staff Attorney	2021	162.1	310	ALJ-387	\$50,251	162.1	\$230 [3]	\$37,283.00
Jamie Katz	2022	19.5	320	ALJ-387	\$6,240	19.5	\$240 [4]	\$4,680.00

CLAIMED						CPUC AWARD		
Leslie Martinez, Community Engagement Specialist	2021	0.5	170	Hourly Rate Chart	\$85	0 [5]	\$0 [5]	\$0 [5]
Subtotal: \$61,140.00						Subtotal: \$46,987.00		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Jamie Katz	2021	4.4	155	ALJ-387	\$682	4.4	\$115 [3]	\$506.00
Jamie Katz	2022	7.5	160	ALJ-387	\$1200	7.5	\$120 [4]	\$900.00
Michael Claiborne	2022	0.9	175	ALJ-387	\$157.50	0.9	\$197.50 [2]	\$177.75
Kaylon Hammond	2022	0.2	90	Hourly Rate Chart	\$18	0.2	\$90 [6]	\$18.00
Subtotal: \$2057.50						Subtotal: \$1,601.75		
TOTAL REQUEST: \$63,197.50						TOTAL AWARD: \$48,588.75		
<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’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer’s normal hourly rate</p>								
ATTORNEY INFORMATION								
Attorney		Date Admitted to CA BAR²		Member Number		Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation		
Michael Claiborne		November 2011		281308		No		
Jamie Katz		May 2019		325560		No		

C. Attachments Documenting Specific Claim and Comments on Part III:
(attachments not attached to final Decision)

² 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
1	Certificate of Service
2	Timesheet

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Michael Claiborne (Claiborne) 2021 Rate & Hours Explanation	D.22-04-027 establishes a 2021 rate of \$380 for Claiborne. LCJA's timesheet has 12.4 hours inputted for Claiborne in 2022; however, they are claiming 12.6 hours on this PD. We will apply the hours claimed on the timesheet to this claim.
[2] Claiborne 2022 Rate	D.23-08-046 establishes a 2022 rate of \$395 for Claiborne.
[3] Jamie Katz (Katz) 2021 Rate	D.23-08-046 establishes a 2021 rate of \$230 for Katz.
[4] Katz 2022 Rate	D.23-08-046 establishes a 2022 rate of \$240 for Katz.
[5] Leslie Martinez (Martinez) Disallowance	LCJA claims 0.5 of an hour for "Internal check in re feedback from residents" on 3/31/2021. We do not find this time compensable as it did not make a significant contribution to the decision.
[6] Kaylon Hammond (Hammond) 2022 Rate	D.23-08-046 establishes a 2022 rate of \$180 for Hammond.

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. Leadership Counsel for Justice and Accountability has made a substantial contribution to D.21-06-036 and D.22-04-037.
2. The requested hourly rates for Leadership Counsel for Justice and Accountability'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, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$48,588.75.

CONCLUSION OF LAW

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

ORDER

1. Leadership Counsel for Justice and Accountability is awarded \$45,588.75.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Southern California Gas Company, Pacific Power d/b/a PacifiCorp, Liberty Utilities (CalPeco Electric) LLC, Bear Valley Electric Service, Inc., Southwest Gas Corporation, Alpine Natural Gas, Inc., and West Coast Gas Company, Inc. shall pay Leadership Counsel for Justice and Accountability their respective shares of the award, based on their California-jurisdictional electric and gas revenues for the 2021 calendar year, to reflect the year in which the proceeding was primarily litigated. If such data are unavailable, the most recent electric and gas revenues 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 August 31, 2022, the 75th day after the filing of Leadership Counsel for Justice and Accountability'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 November 2, 2023, at Sacramento, California.

ALICE REYNOLDS
President
GENEVIEVE SHIROMA
DARCIE L. HOUCK
JOHN REYNOLDS
KAREN DOUGLAS
Commissioners

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:	D2311028	Modifies Decision?	No
Contribution Decision(s):	D2106036; D2204037		
Proceeding(s):	R2102014		
Author:	Camille Watts-Zagha		
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Southern California Gas Company, Pacific Power d/b/a PacifiCorp, Liberty Utilities (CalPeco Electric) LLC, Bear Valley Electric Service, Inc., Southwest Gas Corporation, Alpine Natural Gas, Inc., and West Coast Gas Company, Inc.		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Leadership Counsel for Justice and Accountability	June 17, 2022	\$63,197.50	\$48,588.75	N/A	See CPUC Comments, Disallowances, and Adjustments

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Michael	Claiborne	Attorney	340	2021	\$380
Michael	Claiborne	Attorney	350	2022	\$390
Kaylon	Hammond	Expert	180	2022	\$180
Jamie	Katz	Attorney	310	2021	\$230
Jamie	Katz	Attorney	320	2022	\$240
Leslie	Martinez	Expert	170	2021	\$0

(END OF APPENDIX)