

Decision 23-11-116 November 30, 2023

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Application of Southern California Edison Company (U 338-E) for Approval of its Catalina Repower Project	Application 21-10-005 (Filed October 15, 2021)
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**DECISION GRANTING COMPENSATION TO THE UTILITY REFORM NETWORK  
FOR SUBSTANTIAL CONTRIBUTION TO DECISION 22-11-007**

<b>Intervenor:</b> The Utility Reform Network	<b>For contribution to Decision (D.) 22-11-007</b>
<b>Claimed:</b> \$110,335.28	<b>Awarded:</b> \$110,335.28
<b>Assigned Commissioner:</b> Genevieve Shiroma	<b>Assigned ALJs:</b> Sophia Park

**PART I: PROCEDURAL ISSUES**

<b>A. Brief description of Decision:</b>	<u>D.22-11-007</u> This decision approves an all-party settlement agreement regarding Southern California Edison Company's proposed Catalina Repower Project. The settlement agreement establishes a process for Southern California Edison Company to obtain future Commission review and approvals for the project once the South Coast Air Quality Management District completes its rulemaking on air emissions requirements impacting the project and issues the necessary permits to construct for the project.
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812<sup>1</sup>:**


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<sup>1</sup> All statutory references are to California Public Utilities Code unless indicated otherwise.

	Intervenor	CPUC Verification
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	12/6/2021	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	12/16/2021	Verified
4. Was the NOI timely filed?		Yes
<b>Showing of eligible customer status (§ 1802(b) or eligible local government entity status (§§ 1802(d), 1802.4):</b>		
5. Based on ALJ ruling issued in proceeding number:	See Comment #1	R.20-08-021
6. Date of ALJ ruling:	See Comment #1	12/11/2020
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
<b>Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):</b>		
9. Based on ALJ ruling issued in proceeding number:	R.20-08-021	Verified
10. Date of ALJ ruling:	12/11/2020	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.22-11-007	Verified
14. Date of issuance of Final Order or Decision:	11/04/2022	Verified
15. File date of compensation request:	12/21/2022	Verified
16. Was the request for compensation timely?		Yes

**C. Additional Comments on Part I:**

#	Intervenor’s Comment(s)	CPUC Discussion
1	TURN did not receive an affirmative ruling on its Notice of Intent in this proceeding. As explained in the Commission’s Intervenor Compensation guide, “normally, an	An ALJ ruling in response to TURN’s NOI was not necessary for the reasons stated by TURN. TURN, however, does not appear to be quoting from the most recent version of the

<p>ALJ Ruling needs not be issued unless: (a) the NOI has requested a finding of “significant financial hardship” under § 1802(g). (b) the NOI is deficient; or (c) the ALJ desires to provide guidance on specific issues of the NOI.” (page 12) Since none of these factors apply to the NOI submitted in this proceeding, there was no need for an ALJ ruling in response to TURN’s NOI.</p>	<p>Commission’s Intervenor Compensation Program Guide, dated April 2017.</p>
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## 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><b>1. ALTERNATIVES / UTILITY-OWNED GENERATION</b></p> <p>TURN objected to SCE's original forecasted costs for renewable energy and storage on several grounds, including the assumption that all projects are utility-owned. TURN demonstrated that utility-owned clean energy projects are not able to efficiently monetize federal tax credits and therefore are more costly to ratepayers than third-party projects contracted via Power Purchase Agreements. Based on this evaluation, TURN urged the Commission to require SCE to give preference to third-party generation options to maximize benefits to ratepayers.</p>	<p><u>TURN protest, pages 2-3</u></p> <p><u>TURN direct testimony, 2-11, 12-13</u></p> <p><u>TURN opening brief, pages 10-12</u></p>	<p>Verified</p> <p>Verified</p>

<p>The Decision adopts the all-party settlement which includes provisions designed to favor third-party ownership of new low carbon and zero carbon resources. The key settlement provision requires that SCE’s upcoming Catalina Request for Offers will only consider third-party projects (under Power Purchase Agreements) and that SCE may not “adopt any practices or policies that place such offers at a competitive disadvantage relative to utility-owned generation alternatives.” (Settlement, Section 6.3.1) The Settlement also requires that SCE share with TURN and Cal Advocates, in advance of any RFO, a “draft methodology for evaluating the cost-effectiveness of third-party and utility-owned resource options.” The Settlement further provides that SCE may only seek approval of any utility-owned non-zero-carbon generation through a subsequent application process (rather than via a Tier 3 advice letter as originally proposed by SCE). Finally, the Settlement requires SCE to consider third-party ownership for any non-diesel generation to be installed at the Pebbly Beach Generating Station pursuant to an order by the South Coast Air Quality Management District.</p>	<p><u>D.22-11-007, Ordering Paragraph 1</u></p> <p><u>Settlement, Section 6.2 (Phase 1 B, page A-8), Sections 6.3.1 (All-Source Request for Offers, pages A-9 through A-10) and 6.3.4 (Balance of Generation Beyond the Potential Three Diesel Units, page A-11)</u></p>	
<p><b>2. DIESEL / AUTHORIZATION FOR NEW PROCUREMENT</b></p>		

<p>TURN objected to SCE's original proposal to procure and install 13.4 MW of new diesel generation at the Pebbly Beach Generating Station. TURN noted that the modeling supporting SCE's application fails to assess the combined impacts of 13.4 MW of new diesel plus some amount of renewable/zero carbon resources, making it impossible to assess whether the addition of the full amount of new diesel would effectively frustrate the cost-effectiveness of new clean generation. TURN opposed Commission authorization for 13.4 MW of new diesel.</p>	<p><u>TURN protest, pages 1-3</u></p>	<p>Verified</p>
<p>The Decision adopts the all-party Settlement which requires SCE to amend its original proposal from six new diesel generation units to phased approach with an initial implementation of no more than three diesel units combined with an all source RFO to evaluate and procure other clean and renewable generation that would reduce the need for additional diesel units. The Settlement further requires any SCE proposal for additional diesel (beyond the first three units) to occur as a separate application and include a demonstration "why and how non-zero-carbon alternatives are able to satisfy the criteria of reliability, feasibility, cost, emissions compliance and compliance with other applicable state or</p>	<p><u>D.22-11-007, Ordering Paragraph 1 (adopting Settlement)</u></p> <p><u>Settlement, Section 2 (Proceeding Details, page A-4), Section 6 (Phase 1, pages A-7 through A-8), Section 6.3.4 (Balance of Generation Beyond the Potential Three Diesel Units, page A-11).</u></p>	<p>Verified</p>

[illegible]

<p>available to developers bidding into the RFO process.</p> <p>The Decision adopts the all-party settlement which directs SCE to “engage relevant landowners on Catalina” to identify land that is suitable for new clean generation projects and “allow third-party developers to submit bids that would propose to use any sites identified as potentially available as a result of SCE’s efforts to engage with the primary landowners.” (Section 6.3.2)</p>	<p><u>D.22-11-007, Ordering Paragraph 1 (adopting Settlement)</u></p> <p><u>Settlement, Section 6.3.2 (Land Availability for Solar Development, pages A-10 and A-11)</u></p>	<p>Verified</p>
<p><b>5. REQUEST FOR OFFERS / ADVANCE REVIEW</b></p> <p>TURN noted concerns about SCE’s proposed Request for Offers (RFO) that could jeopardize its effectiveness and highlighted the importance of enhanced review of the process. Specifically, TURN noted the poor results from SCE’s prior Request for Information (RFI) and explained the importance of requiring SCE to address hurdles to participation and to “make effective attempts to induce a robust response from third parties offering viable projects at highly competitive prices.” TURN argued that the Commission should apply greater oversight to the RFO process.</p> <p>The Decision adopts the all-party Settlement which outlines a process for SCE to share RFO documentation with</p>	<p><u>TURN direct testimony, page 11</u></p> <p><u>TURN opening brief, pages 7-8</u></p> <p><u>TURN reply brief, pages 3-4</u></p> <p><u>D.22-11-007, page 9, Ordering Paragraph 1 (adopting Settlement)</u></p>	<p>Verified</p> <p>Verified</p>

<p>TURN and Cal Advocates no later than 60 days prior to the launch of the solicitation. This documentation must include draft instructions to bidders and updates on SCE's efforts to obtain land rights for sites that could be used by developers bidding into the RFO. The Settlement permits TURN and Cal Advocates to seek advance Commission direction relating to the RFO if these parties are not satisfied with SCE's proposed resolution of any identified concerns prior to the launch of the solicitation. As noted in the Decision, "the agreed upon process allows for TURN and Cal Advocates to provide input regarding the RFO and challenge the results of and SCE's conduct with respect to the RFO." (page 9)</p>	<p><u>Settlement, Section 6.3.1 (All-Source Request for Offers, pages A-9 and A-10)</u></p>	
<p><b>6. DIESEL / UNIT 15 NONCOMPLIANCE</b></p> <p>TURN expressed concerns about SCE's commitment to a clean energy future at Catalina, noting SCE's ongoing references to the goal of replacement of all six existing diesel units at the Pebbly Beach Generating Station with six new diesel generation units. TURN indicated a preference for retaining the existing Unit 15 subject to any retrofitting needed to meet emissions requirements rather than replacing it with a new unit.</p> <p>The Decision adopts the all-party Settlement which</p>	<p><u>TURN protest, page 1</u></p> <p><u>TURN opening brief, pages 1, 4</u></p> <p><u>TURN reply brief, pages 1-2, 5-6</u></p> <p><u>D.22-11-007, pages 6, 8, 19, Ordering Paragraph 1 (adopting Settlement)</u></p>	<p>Verified</p> <p>Verified</p>



<p>outlines specific options for SCE to address air quality noncompliance relating to the operation of Unit 15. The Settlement allows SCE to install a diesel particulate filter or catalyst blocks without any need to submit an advice letter. If replacement of the unit is necessary, SCE is directed to file a Tier 2 Advice Letter seeking approval. The Decision notes that TURN or Cal Advocates may protest that Advice Letter if either party believes that “SCE has not adequately demonstrated” that its proposed solution “is cost-effective, necessary to achieve emissions requirements and required for reliability.” (page 19)</p>	<p><u>Settlement, Section 6.2 (Phase 1B, page A-8)</u></p>	
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**B. Duplication of Effort (§ 1801.3(f) and § 1802.5):**

	<b>Intervenor’s Assertion</b>	<b>CPUC Discussion</b>
<b>a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?</b>	Yes	Verified
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	No	Verified
<b>c. If so, provide name of other parties:</b>		
<p><b>d. Intervenor’s claim of non-duplication:</b></p> <p>The only two active parties in this proceeding (apart from the applicant) were TURN and Cal Advocates. TURN uniquely represented the interests of the residential customer class. TURN worked closely with Cal Advocates to coordinate on discovery and settlement issues. This coordination yielded a successful all-party settlement addressing core contested issues which reduced the amount of time devoted to the proceeding by all parties.</p>		Verified

<p>With respect to the issues not resolved by the Settlement, TURN deferred to Cal Advocates to address most issues in opening briefs. TURN provided modest support for some of these recommendations in reply briefs.</p> <p>To the extent that duplication occurred, it was unavoidable given the need to participate on key issues of interest to TURN and its members. TURN worked diligently to ensure that its involvement efficiently influenced the outcome of the Settlement and the final Decision.</p>	
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**C. Additional Comments on Part II:**

#	Intervenor's Comment	CPUC Discussion
1	<p>TURN's protest was drafted prior to reviewing discovery responses and without the benefit of an extensive review of the application. The active parties in this case negotiated a settlement agreement after the filing of protests but prior to the submission of direct testimony. Since the Settlement was negotiated prior to the preparation of intervenor testimony, TURN was not able to identify all its concerns and recommendations in either a pleading or testimony submitted prior to the conclusion of Settlement negotiations. Some Settlement provisions address concerns that TURN first identified during the course of negotiations and were included in the agreement at TURN's urging. The Commission should recognize that an intervenor may make a substantial contribution to a Settlement without having previously identified an issue in testimony or another filed pleading, especially in a case where the settlement process precedes the submission of prepared testimony.</p>	Noted

### PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
<p><b>a. Intervenor's claim of cost reasonableness:</b></p> <p>As demonstrated in the substantial contribution section, TURN's participation had a significant impact on the outcome of the core issues resolved in this proceeding. TURN's contributions include:</p> <ul style="list-style-type: none"> <li>• Requirements that SCE prioritize contracting with cheaper third-party owned clean generation projects that can support reliability and displace fossil generation on Catalina.</li> <li>• Limiting the replacement of diesel generation to two (or three) new units rather than the six units originally proposed in SCE's application with any additional proposed fossil generation required to be considered in a separate application subject to a high reasonableness threshold.</li> <li>• Prioritizing the use of federal and state incentives that are available to support clean generation and microgrids.</li> <li>• Greater advance oversight of the Catalina Request for Offers, an emphasis on the proactive identification of suitable sites to be secured by SCE on behalf of bidders, and comprehensive review of solicitation protocols to maximize participation and produce best value projects for ratepayers.</li> </ul> <p>Given the very specific and substantial rate-related benefits achieved for customers of SCE, the benefits associated with TURN's participation far exceed the cost of TURN's participation in this proceeding. TURN's claim should be found to be reasonable.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>
<p><b>b. Reasonableness of hours claimed:</b></p> <p>Given TURN's showings on the issues where it made contributions, the amount of time devoted by its staff is fully reasonable. TURN devoted the minimum number of hours to reviewing rulings, drafting pleadings, performing discovery, drafting testimony, participating in settlement negotiations and drafting post-hearing briefs.</p> <p>The number of hours devoted to the wide range of issues and process in this case demonstrates the efficiency of TURN's staff. Moreover, the time devoted to each task was reasonable in light of the complexity of the issues presented. The amount of time should be found to be fully reasonable.</p>	<p>Noted</p> <p>Noted</p>

<p><b>Reasonableness of Staffing</b></p> <p><u>Matthew Freedman</u> TURN's lead attorney for this proceeding was Matthew Freedman. Mr. Freedman reviewed/edited/drafted all pleadings, analyzed proposals by other parties, assisted TURN's expert with discovery and the development of testimony, served as TURN's lead participant in Settlement negotiations, and was the primary liaison coordinating with Cal Advocates.</p> <p><u>Jennifer Dowdell</u> Ms. Dowdell was TURN's primary expert witness focusing on RFO design and alternative resource issues. Ms. Dowdell reviewed the application, analyzed SCE's model used to evaluate the costs of alternative resource options, drafted discovery, provided advice and input in Settlement negotiations, drafted prepared testimony and assisted with TURN's briefs.</p> <p><u>Compensation Request</u> TURN's request also includes hours devoted to the preparation of compensation-related filings. The time devoted to this compensation request is appropriate and should be found to be reasonable.</p> <p><b>Travel costs</b></p> <p>TURN's request includes the costs of travel to Catalina island for a site visit to the Pebbly Beach Generating Station and an alternative site identified by SCE (pursuant to the Settlement) for the potential placement of a third-party owned solar and storage project. The site visit was organized by SCE for all case participants and included representatives from the CPUC's Energy Division and Cal Advocates. TURN Staff Attorney Matthew Freedman participated in the site visit. The costs claimed in this request are limited to airfare from Oakland to Los Angeles, ground transportation to/from the Long Beach pier, and the costs of the ferry to/from Catalina island. TURN is not seeking compensation for the overnight accommodations used by its staff in Los Angeles or transport to/from Oakland airport.</p> <p>The Commission should find that TURN's participation in the site visit was an essential element of participation in this proceeding. Had TURN not joined the site visit, TURN would have been the only active party in the case to have declined. Given the ongoing processes relating to the RFO and future advice letter filings, the site visit was an important opportunity to evaluate challenges at the Pebbly Beach Generating Station and options for moving Catalina to a cleaner energy future.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>
<p><b>c. Allocation of hours by issue:</b></p> <p>TURN has allocated all attorney and consultant time by issue area or activity, as evident on our attached timesheets. The following codes relate</p>	

<p>to specific substantive issue and activity areas addressed by TURN. TURN also provides an approximate breakdown of the number of hours spent on each task and the percentage of total hours devoted to each category.</p>	
<p><b>General Participation (GP) – 37.5 hours – 19.69% of total</b></p> <p>General Participation work essential to participation that typically spans multiple issues and/or would not vary with the number of issues that TURN addresses. This includes reviewing Commission rulings and Proposed Decisions, initial reviews of party pleadings and testimony submitted by other parties, drafting the protest, attendance at status and prehearing conferences, along with case strategy and schedule discussions.</p>	Noted
<p><b>Alternatives (ALT) – 55.05 hours – 28.9% of total</b></p> <p>Work relating to alternatives to diesel generation at both the Pebbly Beach Generating Station and other suitable locations on Catalina island. Includes work on the cost competitiveness of third-party vs. utility-owned projects, the availability of federal and state incentives, and review of SCE’s original alternatives feasibility study.</p>	Noted
<p><b>Diesel generation (DIESEL) – 17.15 hours – 9% of total</b></p> <p>Work relating to the need to replace existing diesel units at the Pebbly Beach Generating station with new diesel generation. Includes review of SCAQMD requirements and other constraints governing new/existing diesel utilization (such as Unit 15).</p>	Noted
<p><b>Request for Offers (RFO) – 25.05 hours – 13.15% of total</b></p> <p>Work relating to SCE’s proposed Catalina Request for Offers. Includes review of RFO process, development of options for advanced review of protocols and bidder documents by TURN and CalPA, and options for SCE to secure land that can be used by third-party RFO bidders.</p>	Noted
<p><b>Settlement (SETTLE) – 47 hours – 24.67% of total</b></p> <p>Work devoted to negotiating, drafting and defending the all-party settlement agreement proposed by SCE/TURN/CalPA that was adopted in D.22-11-007.</p>	Noted
<p><b>Coordination (COORD) – 8.75 hours – 4.59% of total</b></p> <p>Work devoted to coordinating with Cal Advocates in order to reduce duplication and develop joint strategies for achieving best outcomes for ratepayers.</p>	Noted
<p><b>Compensation – 11 hours</b></p> <p>Time spent on the notice of intent to claim compensation and the preparation of this compensation request.</p>	Noted
<p><b>Travel – 5 hours</b></p> <p>Time spent traveling for the site visit at Catalina Island organized by SCE for Cal Advocates, CPUC staff and TURN.</p>	Noted

<p>-----</p> <p>TURN used one multi-issue code to describe some time devoted to a mix of issues. The following code was used to allocate hours as follows:</p> <p># = 45% ALT, 10% DIESEL, 45% RFO</p> <p>TURN has allocated the hours coded with this multi-issue code to each of the identified issue/task areas and incorporated these hours into the totals listed above.</p> <p>TURN submits that under the circumstances this information should suffice to address the allocation requirement under the Commission's rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.</p>	
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**B. Specific Claim:\***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Jennifer Dowdell, TURN Energy Analyst	2021	14.00	\$400.00	D.22-06-018	5,600.00	14.0	\$400	\$5,600.00
Jennifer Dowdell, TURN Energy Analyst	2022	62.75	\$415.00	Res. ALJ-393, 2021 Rate plus 3.3% COLA	26,041.25	62.75	\$415 [1]	\$26,041.25
Matthew Freedman, TURN Staff Attorney	2021	16.50	\$625.00	D.22-03-028	10,312.50	16.5	\$625	\$10,312.50
Matthew Freedman, TURN Staff Attorney	2022	97.25	\$645.00	Res. ALJ-393 - 2021 Rate plus 3.3% COLA	62,726.25	97.25	\$645 [2]	\$62,726.25

<b>Subtotal: \$104,680.00</b>						<b>Subtotal: \$104,680.00</b>		
<b>OTHER FEES</b>								
<b>Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):</b>								
<b>Item</b>	<b>Year</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Basis for Rate*</b>	<b>Total \$</b>	<b>Hours</b>	<b>Rate</b>	<b>Total \$</b>
Matthew Freedman TRAVEL	2022	5.00	\$322.50	50% of 2022 rate (2021 rate + Res. ALJ-393)	1,612.50	5.0	\$322.50	\$1,612.50
<b>Subtotal: \$1,612.50</b>						<b>Subtotal: \$1,612.50</b>		
<b>INTERVENOR COMPENSATION CLAIM PREPARATION **</b>								
<b>Item</b>	<b>Year</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Basis for Rate*</b>	<b>Total \$</b>	<b>Hours</b>	<b>Rate</b>	<b>Total \$</b>
Matthew Freedman	2020	1.00	\$312.50	50% of 2021 rate	\$312.50	1.0	\$312.50	\$312.50
Matthew Freedman	2022	10	\$322.50	50% of 2022 rate	\$3,325.00	10.0	\$322.50	\$3,225.00
<b>Subtotal: \$3,537.50</b>						<b>Subtotal: \$3,537.50</b>		
<b>COSTS</b>								
<b>#</b>	<b>Item</b>	<b>Detail</b>			<b>Amount</b>	<b>Amount</b>		
1	Travel	Airfare/Uber/Ferry cost for site visit to Catalina island including SCE and CPUC staff			505.28	\$505.28		
<b>Subtotal: \$505.28</b>						<b>Subtotal: \$505.28</b>		
<b>TOTAL REQUEST: \$110,335.28</b>						<b>TOTAL AWARD: \$110,335.28</b>		
<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. 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.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate</p>								
<b>ATTORNEY INFORMATION</b>								

Attorney	Date Admitted to CA BAR <sup>2</sup>	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Matthew Freedman	March 2001	214812	No

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

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Daily Time Records for Attorneys and Experts
Attachment 3	Cost/expense details
Attachment 4	Allocation by Issue

**D. CPUC Comments, Disallowances, and Adjustments**

Item	Reason
[1] Dowdell 2022 Hourly Rate	D.23-04-022 authorized a 2022 rate of \$415 for Dowdell.
[2] Freedman 2022 Hourly Rate	D.23-04-054 authorized a 2022 rate of \$645 for Freedman.

**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))**

<b>A. Opposition: Did any party oppose the Claim?</b>	No
<b>B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?</b>	Yes

**FINDINGS OF FACT**

- The Utility Reform Network has made a substantial contribution to D.22-11-007.

<sup>2</sup> This information may be obtained through the State Bar of California’s website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.



2. The requested hourly rates for The Utility Reform Network'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, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$110,335.28.

**CONCLUSION OF LAW**

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

**ORDER**

1. The Utility Reform Network is awarded \$110,335.28.
2. Within 30 days of the effective date of this decision, Southern California Edison Company shall pay The Utility Reform Network 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 March 6, 2023, the 75<sup>th</sup> day after the filing of The Utility Reform Network'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 30, 2023, at Sacramento, California.

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

**APPENDIX****Compensation Decision Summary Information**

Compensation Decision:	D2311116	Modifies Decision?	No
Contribution Decision(s):	D2211007		
Proceeding(s):	A2110005		
Author:	ALJ Park		
Payer(s):	Southern California Edison Company		

**Intervenor Information**

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	12/21/22	\$110,335.28	\$110,335.28	N/A	N/A

**Hourly Fee Information**

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Matthew	Freedman	Attorney	\$625	2021	\$625
Matthew	Freedman	Attorney	\$645	2022	\$645
Jennifer	Dowdell	Expert	\$400	2021	\$400
Jennifer	Dowdell	Expert	\$415	2022	\$415

**(END OF APPENDIX)**