

Decision 10-08-017 August 12, 2010

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Consider Smart Grid Technologies Pursuant to Federal Legislation and on the Commission's Own Motion to Actively Guide Policy in California's Development of a Smart Grid System.

Rulemaking 08-12-009
(Filed December 18, 2008)

**DECISION GRANTING INTERVENOR COMPENSATION
TO THE CONSUMER FEDERATION OF CALIFORNIA FOR SUBSTANTIAL
CONTRIBUTIONS TO DECISION 09-12-046**

This decision awards Consumer Federation of California \$14,875.00 for its substantial contributions to Decision 09-12-046. This represents a decrease of \$10,591.00 or 41.60% from the amount requested due to unproductive effort, lack of substantial contributions, and excessive hours. Responsibility for today's award will be allocated to the affected utilities.

1. Background

This rulemaking was launched pursuant to the Energy Independence and Security Act of 2007 (H.R. 6,110th Congress, or EISA), to consider policies for California investor-owned utilities (IOUs) to enhance the ability of the electric grid to support important policy goals including reducing greenhouse gas (GHG) emissions, increasing energy efficiency and demand response, expanding the use of renewable energy, and improving reliability. The Commission's proposed policies and findings pertaining to EISA were presented in a

September 28, 2009 joint ruling (Joint Ruling) of the assigned Commissioner and Administrative Law Judge (ALJ), requesting parties' comments.

Decision (D.) 09-12-046 considered policies and findings to fulfill the regulatory obligations imposed by the EISA. The Commission found the California policy to be largely consistent with these requirements and declined to adopt the requirements pertaining to Smart Grid investments for Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E) and San Diego Gas & Electric Company (SDG&E). The decision also declined to adopt for these utilities the EISA information disclosure requirements pertaining to Smart Grid information. D.09-12-046, however, adopted policies for SCE, PG&E and SCE concerning consumer access to usage and price information that would be available through California's Smart Grid infrastructure and consistent with Senate Bill (SB) 17 (Padilla) (Chapter 327, Statutes of 2009), which set as a goal for California "[i]ncreased use of cost-effective digital information and control technology to improve reliability, security, and efficiency of the electric grid."¹ Concerning electricity usage data, the decision required that SCE, PG&E and SDG&E provide consumers and third parties approved by consumers with that data.

2. Requirements for Awards of Compensation

The intervenor compensation program, which is set forth in Pub. Util. Code §§ 1801-1812,² requires California jurisdictional utilities to pay the reasonable costs of an intervenor's participation if that party makes a substantial

¹ Pub. Util. Code § 8360(a).

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

contribution to the Commission's proceedings. The statute provides that the utility may adjust its rates to collect the amount awarded from its ratepayers.

All of the following procedures and criteria must be satisfied for an intervenor to obtain a compensation award:

1. The intervenor must satisfy certain procedural requirements including the filing of a sufficient notice of intent (NOI) to claim compensation within 30 days of the prehearing conference (PHC), pursuant to Rule 17.1 of the Commission's Rules of Practice and Procedure (Rules), or at another appropriate time that we specify. (§ 1804(a).)
2. The intervenor must be a customer or a participant representing consumers, customers, or subscribers of a utility subject to our jurisdiction. (§ 1802(b).)
3. To seek a compensation award, the intervenor must file and serve a request for a compensation award within 60 days of our final order or decision in a hearing or proceeding. (§ 1804(c).)
4. The intervenor must demonstrate "significant financial hardship." (§§ 1802(g) and 1804(b)(1).)
5. The intervenor's presentation must have made a "substantial contribution" to the proceeding, through the adoption, in whole or in part, of the intervenor's contention or recommendations by a Commission order or decision or as otherwise found by the Commission. (§§ 1802(i) and 1803(a).)
6. The claimed fees and costs must be reasonable (§ 1801), necessary for and related to the substantial contribution (D.98-04-059), comparable to the market rates paid to others with comparable training and experience (§ 1806), and productive (D.98-04-059).

In the discussion below, the procedural issues in Items 1-4 above are combined and a separate discussion of Items 5-6 follows.

2.1. Preliminary Procedural Issues

Under § 1804(a)(1) and Rule 17.1(a)(1), a customer who intends to seek an award of intervenor compensation must file an NOI before certain dates.

In a proceeding in which a PHC is held, the intervenor must file its NOI between the dates the proceeding was initiated until 30 days after the PHC is held. (Rule 17.1(a)(1).) The PHC in this matter was held on March 27, 2009. CFC timely filed its NOI on April 16, 2009.

In its NOI, Consumer Federation of California (CFC) asserted financial hardship. A May 13, 2009 ruling found CFC is a customer as that term is defined in § 1802(b)(1) and has met the eligibility requirements of § 1804(a), including the requirement that it establish significant financial hardship. CFC was found eligible for compensation in this proceeding. (May 13, 2009 Ruling at 16.)

As to the timeliness of the request for compensation, CFC filed the request on February 19, 2010, within 60 days of D.09-12-046 being issued.³ No opposition was filed.

In view of the above, we affirm the ALJ's ruling and find that CFC has satisfied all procedural requirements necessary to make its request for compensation in this proceeding.

3. Substantial Contribution

In evaluating whether a customer made a substantial contribution to a proceeding, we look at several things. First, we look at whether the Commission adopted one or more of the factual or legal contentions, or specific policy or procedural recommendations put forward by the customer. (§ 1802(i).) Second, if the customer's contentions or recommendations paralleled those of another

³ D.09-12-046 issued on December 20, 2009.

party, we look at whether the customer's participation unnecessarily duplicated or materially supplemented, complemented, or contributed to the presentation of the other party. (§§ 1801.3(f) and 1802.5.)

As described in § 1802(i), the assessment of whether the customer made a substantial contribution requires the exercise of judgment.

In assessing whether the customer meets this standard, the Commission typically reviews the record, composed in part of pleadings of the customer and, in litigated matters, the hearing transcripts, and compares it to the findings, conclusions, and orders in the decision to which the customer asserts it contributed. It is then a matter of judgment as to whether the customer's presentation substantially assisted the Commission.⁴

With this guidance in mind, we turn to the claimed contributions CFC made to the proceeding.

The EISA Amendments to the Public Utility Regulatory Policies Act (PURPA) created five tasks⁵ for this proceeding:

1. Whether to require a consideration of Smart Grid investments before making any new investment in the grid;
2. Whether to adopt a special ratemaking treatment for Smart Grid investments;
3. Whether the Commission should adopt a policy authorizing a utility to recover the remaining book value of equipment made obsolete by Smart Grid investments; and

⁴ D.98-04-059, 79 CPUC2d 628 at 653.

⁵ Joint Ruling at 15-16.

4. Whether to require utilities to provide customers with access in written and/or electronic form to information concerning:
 - (i) Prices.
 - (ii) Usage.
 - (iii) Daily updates of prices with details on hourly basis and day ahead projections to the extent available.
 - (iv) Sources – annually with written information on the sources of the power provided by the utility, to the extent it can be determined, by type of generation, including greenhouse gas emissions associated with each type of generation, for intervals during which such information is available on a cost-effective basis.
5. Whether to impose a requirement on utilities to provide purchasers of electric power with access to their own information at any time through the Internet and on other means of communication elected by that utility for Smart Grid applications and whether to provide to other interested persons access to information on electricity use and prices not specific to any purchaser through the Internet. Whether information specific to any purchaser should be provided solely to that purchaser.

For each of these requirements, the Commission in D.09-12-046 considered whether, in the California context, the requirement was consistent with the purposes of EISA and whether to impose the requirement. The Commission analyzed CFC's positions on each of these issues.

On the issue of whether the Commission should require each utility to demonstrate that it has considered a smart grid investment before making any grid investment, the Commission concluded that this requirement should not be imposed on the utilities as it would delay infrastructure investment, increase

costs, and increase the response time for consumer service.⁶ CFC supported the imposition of this requirement and did not prevail on this issue. Unfortunately, CFC did not provide sufficient analysis to support its recommendation and thus did not contribute to the decision-making process leading to the related findings in the decision.⁷ We find that CFC did not contribute on this issue.

On the issue of whether the Commission should authorize each electric utility to recover from ratepayers any capital, operating expenditure, or other costs of the electric utility relating to the deployment of a qualified smart grid system, including a reasonable rate of return, the Commission concluded that there was no need to change its traditional ratemaking procedures.⁸ CFC supported the traditional ratemaking approach, and provided the appropriate legal analysis of its position.⁹ We find that CFC contributed to this issue.¹⁰

On the issue of whether the Commission should authorize any electric utility that deploys a smart grid to recover the remaining book-value costs of any equipment rendered obsolete by the deployment of the qualified smart grid system, the Commission determined that specific rate treatment for obsolete equipment should be deferred to general rate cases or applications that address Smart Grid investment.¹¹ CFC agreed with the Joint Ruling that proposed this

⁶ See discussion in D.09-12-046 at 26-28, finding of facts 7-10 at 71-72.

⁷ CFC comments on the Order Instituting Rulemaking 08-12-009 at 21. D.09-12-046 specifically noted that fact (D.09-12-046 at 22).

⁸ D.09-12-046, at 33-35.

⁹ See, for example, CFC's October 26, 2009 comments on Joint Ruling, at 7-10.

¹⁰ D.09-12-046 at 22.

¹¹ D.09-12-046 at 39.

approach. CFC also recommended against the prospect of cost recovery being sought in a separate proceeding that does not consider other uses of smart grid technologies. Unfortunately, CFC did not provide substantial analysis on this issue, and thus its contribution on this issue was limited.¹²

EISA required that the Commission make findings of whether or not to require utilities to provide purchasers of electricity with access to their own information at any time through the Internet and through other means of communications elected by the utility. In addition, under the EISA amendment to the PURPA, the Commission needed to determine whether to require utilities to provide other interested persons access to information not specific to any purchaser through the Internet. On the issue of whether the Commission should require utilities to provide customers with access to the information referenced in 16 U.S.C. § 1621(d)(19)(B) of PURPA in written and electronic form, the Commission concluded that its prior actions on implementing information disclosure policies in the context of the major utilities' advanced metering initiative constitute a "prior state action" pursuant to 16 U.S.C. § 1621(d), and make further action unnecessary to fulfill EISA requirements.¹³ However, the Commission found it necessary to reaffirm its expectations that PG&E, SDG&E and SCE provide their customers and other interested persons with real-time or near real-time retail and wholesale price information and provide their customers with usage information. The Commission indicated that in the next part of the proceeding, it would consider how to require that these utilities

¹² See, for example, CFC October 26, 2009 comments on Joint Ruling at 11-12, or November 2, 2009 reply comments on the Joint Ruling, at 4-5.

¹³ D.09-12-046 at 50.

provide retail prices and wholesale costs on a real-time or near real-time basis in a machine-readable form consistent with smart grid EISA standards.¹⁴

We find that although CFC did not prevail on these issues, it contributed to the Commission's plans to address its various concerns in this area. The Commission reiterated its policy that the Commission's goal of customer access to usage information should be a goal of IOUs in implementing a smart grid. We indicated that significant concerns in this area needed to be addressed via additional workshops and comments.¹⁵ CFC and TURN in their joint comments recommended that the Commission initiate a new phase in this rulemaking or open a new proceeding that would specifically consider issues related to customer and third party access to customer-specific usage information in a post-AMI world.¹⁶ We find that CFC contributed to these issues in its joint comments filed with TURN on October 26, 2009.

CFC supported providing prices and GHG emission information to the customers, to promote more efficient use of their consumption and to reduce GHG, and asserted that Californians have a distinct need for standards that will protect their Constitutional right to privacy.¹⁷ We find further that CFC contributed by arguing that that additional work was needed in order to create a verification system to ensure security.¹⁸ Unfortunately, CFC's assertions in its

¹⁴ D.09-12-046 at 52.

¹⁵ D.09-12-046 at 61-62.

¹⁶ TURN and CFC Joint Comments of October 26, 2009, pertaining to the EISA Standard Regarding Customer and Third Party Access to Private Usage Information at 4-5.

¹⁷ CFC's comments on Joint Ruling at 12.

¹⁸ CFC Comments on OIR at 26.

comments do not go much deeper than general statements, and lack a more substantive analysis. We therefore find that although CFC contributed in this area, the extent of its contribution was not significant.

5. Reasonableness of Requested Compensation

CFC requests \$25,466.00 for its participation in this proceeding, as follows:

Work on Proceeding				
Attorney	Year	Hours	Hourly Rate	Total
Alexis K. Wodtke	2008/09	64.91	\$350	\$22,718.50
Preparation of Compensation Request				
Attorney	Year	Hours	Hourly Rate	Total
Alexis K. Wodtke	2010	15.7 ¹⁹	\$175	\$2,747.50
Total Requested Compensation				\$25,466.00

In general, the components of this request must constitute reasonable fees and costs of the customer's preparation for and participation in a proceeding that resulted in a substantial contribution. In the following section we consider the issues related to the reasonableness as well as certain aspects of CFC's claimed substantial contributions based on the allocation of time by issues.

5.1. Hours and Costs Related to and Necessary for Substantial Contribution

We first assess whether the hours claimed for the customer's efforts that resulted in substantial contributions to Commission decisions are reasonable by determining to what degree the hours and costs are related to the work performed and necessary for the substantial contribution. CFC documented its claimed hours by presenting a daily breakdown of the hours of its attorney,

¹⁹ We have corrected here CFC's erroneous figure of 15.4 hours. According to CFC's timesheet, it should be 15.7. The requested dollar amount is correct for 15.7 hours.

accompanied by a brief description of each activity. The hourly breakdown reasonably supports the claim for total hours.

On June 21, 2010, CFC sent to the Commission a letter providing allocation of the time by the issues, on which CFC worked in the subject phase of the proceeding. There are nine issues: 1) SG Definition, Statute, Regs., standards; 2) Purpose/Functions/Capability; 3) Consumer Interest & Response; 4) Planning/Coordination; 5) Privacy/Security; 6) Cost, Rates & Prices; 7) Compare Costs to Benefits; 8). Obsolescence; and 9) Procedural.

We note that CFC breaks its work into two periods: first, from January 13, 2009 up to March 5, 2009, and second, from October 1, 2009 to December 7, 2009. With regard to the first time period, CFC explains in its letter of June 17, 2010, that it reduced by 90% all of these hours, and requested only approximately 10% of that time or 10.46 hours.²⁰ We agree with these voluntary reductions, based on our analysis of CFC's substantial contributions and the reasonableness of the request.

We note that CFC's issues 1 and 2 (SG Definition, Statute, Regs., standards and Purpose/Functions/Capability) were not exactly within the scope of the proceedings leading to D.09-12-046. As the Scoping Memo and Ruling of May 1, 2009, indicates at 12.

The Commission's focus in the OIR on the benefits and costs of a particular Smart Grid investment obviates the need for an overall inventory of projects already completed – existing projects (such as advanced metering infrastructure) will be

²⁰ CFC's June 17, 2010 letter (see the Correspondence file for the proceeding) corrects the originally requested 11.00 hours.

reviewed only to the extent that they affect an evaluation of a proposed new investment.

The proceeding will not develop a “definition” of Smart Grid. A Smart Grid is not a policy destination, but a policy direction that subsumes a host of related activities that will evolve over time and as technology develops.

We find that, to a large extent, CFC’s work on this issue was unproductive.

Based on our observations related to CFC’s issues number 1 and 2, we agree with CFC’s reductions of time in the first time period. For the second time period, CFC did not allocate any of its time to these issues.

We further analyze CFC’s work on its other issues, and make reductions related to the 53.10 hours spent in the second time period marked by CFC. Regarding the issue number 4 (Planning/Coordination) CFC explains that it raised this issue and recommended that the utilities work jointly on creating a statewide plan for establishing a smart grid in California.²¹ However, these matters were not in the proceeding’s phase leading to D.09-12-046. The September 28, 2009 Joint Ruling Inviting Comments on Proposed Policies and Findings Pertaining to the Smart Grid Policies Established by the EISA specifically states that the infrastructure issues will be addressed in the second ruling later in the proceeding.²² The second ruling, indeed, issued on

²¹ June 21, 2010 letter clarifying the subject intervenor compensation request can be found in the Correspondence file for this proceeding.

²² “This ruling proposes tentative findings based on the record in this proceeding and asks a series of questions (and establishes a cycle of comments and replies) to further develop a record that will permit the Commission to address the issues identified for resolution by the Public Utility Regulatory Policies Act (PURPA) as amended by the EISA and to adopt the requisite findings by December 19, 2009. A second ruling will

Footnote continued on next page

February 8, 2010, a few months after D.09-12-046 issued. In accordance with that plan, D.09-12-046 did not focus on the aspects of the proceeding where CFC's Planning/Coordination argument could potentially contribute to the discussion. Therefore, CFC's effort in this area was, in part, unproductive, and we agree with the hourly reductions made by CFC in the first time period.

Our analysis of CFC's work in the first time period applies to CFC's work during the second time period, especially because the Joint Ruling clearly defined the scope of the proceeding. Based on that analysis, we assess that only approximately 10% of the time spent on the issue number 4 (Planning/Coordination) during the second time period have contributed to D.09-12-046. CFC spent 21.40 hours on this issue during the second time period; we disallow 90% of that time or 19.26 hours.

The issue number 9 (Procedural), as the June 21, 2010 letter explains, related to CFC's request for evidentiary hearing, presented as a part of CFC's October 26, 2009 comments on Joint Ruling, at 2-5. D.09-12-046 states that CFC failed to identify factual issues that would warrant hearings. The Commission denied the request.²³ We find that 5.00 hours spent on the Procedural issue were unproductive and should not be compensated.

follow shortly. This second ruling will solicit additional comments that pertain to this Commission's proposals to adopt policies to advance California's Smart Grid infrastructure [footnote omitted] and will address the issues raised for this proceeding by SB 17 (Padilla), if enacted." (Joint Ruling of September 28, 2009, at 2-3.)

²³ D.09-12-046 at 18. See, also Scoping Memo and Ruling of May 1, 2009, at 20, providing instructions for parties contending that evidentiary hearing was necessary.

We further analyze CFC's request based on our analysis of the documents filed by CFC in the second time period (after October 1, 2009), and make several additional disallowances.

November 2, 2009 Comments. According to CFC's time records, it spent 31.1 hours on these comments. The comments focused on description of the parties' positions and on discussion of the customer information and privacy issues.²⁴ CFC's time records indicate, however, that almost a half of that time or 14.5 hours was spent on the Planning/Coordination issue, which we have already reduced by 90% or by 13.05 hours. Of the remaining 18.05 hours, 6.00 hours were spent on the Costs, Rates & Prices, 9.6 hours on Privacy/Security, and 1.00 hour on the Obsolescence issues. Comments on Costs, Rates & Prices occupy less than a page where most of the text is a description of other parties' positions.²⁵ We find 6.00 hours for this task excessive. We reduce this time by 4.00 hours. We believe that 2.00 hours is more than sufficient to prepare the CFC's short comment on this issue. As to the Privacy/Security issue, CFC's comments, especially, CFC's information at 8-12, contributed to the Commission's decision in D.09-12-046 to explore some of the aspects of providing access to customers and authorized third parties to price and usage information. Based on this, we will allow 9.6 hours for these issues. One hour for the recovery of book-value costs of obsolete equipment is reasonable. The resultant 14.05 ($31.1 - 13.05 - 4 = 14.05$) hours is a more reasonable amount of time to prepare the comments.

²⁴ CFC's November 2, 2009 reply comments on Joint Ruling at 5-12.

²⁵ Id., at 3.

The total reduction of the time spent on substantive issues is 28.26 hours.

We also consider the reasonableness of 15.7 hours spent on the intervenor compensation request. We find them excessive, considering that the claim concerns one year, one decision, and one attorney's work. We reduce this time by 4.00 hours. 11.7 hours is a more reasonable amount of time for a project of this complexity.

5.2. Intervenor Hourly Rates

We next take into consideration whether the claimed fees and costs are comparable to the market rates paid to experts and advocates having comparable training and experience and offering similar services.

CFC seeks an hourly rate of \$350 for attorney Alexis Wodtke, for work performed in 2008 and the same rate for work performed in 2009 and 2010. We previously approved this rate for Wodtke in D.09-07-015 and D.09-11-030, and adopt it here.

6. Productivity

D.98-04-059 directed customers to demonstrate productivity by assigning a reasonable dollar value to the benefits of their participation to ratepayers. (D.98-04-059, at 34-35.) The costs of a customer's participation should bear a reasonable relationship to the benefits realized through its participation. This showing assists us in determining the overall reasonableness of the request. CFC states that the most significant benefit coming out of the first phase of this rulemaking is the Commission's determination that traditional rules of ratemaking would apply when utilities requested recovery of smart grid costs, and that stranded costs would not be automatically charged to customers. CFC asserts that to the extent CFC's participation lead to that outcome, its members

and all other Californians achieved great success; however, CFC does not identify precise monetary benefits to ratepayers. (Request, at 7.) Nevertheless, we find that, with the reductions made in this decision, CFC's participation was productive.

7. Award

As set forth in the table below, we award \$14,875.00.

Work on Proceeding				
Attorney	Year	Hours	Hourly Rate	Total
Alexis K. Wodtke	2008/09	36.65	\$350	\$12,827.50
Preparation of Compensation Request				
Attorney	Year	Hours	Hourly Rate	Total
Alexis K. Wodtke	2010	11.70	\$175	\$2,047.50
CALCULATION OF FINAL AWARD				
Work on Proceeding				\$12,827.50
Compensation Request Preparation				\$2,047.50
TOTAL AWARD				\$14,875.00

Pursuant to § 1807, we order SCE, SDG&E, and PG&E to pay this award. We direct these utilities to allocate payment responsibility among themselves based upon their California-jurisdictional electric revenues for the 2009 calendar year, to reflect the year in which the proceeding was primarily litigated.

Consistent with previous Commission decisions, we order that interest be paid on the award amount (at the rate earned on prime, three-month commercial paper, as reported in Federal Reserve Statistical Release H.15) commencing on May 8, 2010, the 75th day after CFC filed its compensation request, and continuing until full payment of the award is made.

We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor

compensation. CFC's records should identify specific issues for which it requested 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.

8. Comments of Proposed Decision

Although this is an intervenor compensation matter where, as provided by Rule 14.6(c)(6) of our Rules of Practice and Procedure, the otherwise applicable 30-day comment period can be waived, in view of the reductions of the requested amount, we provide parties an opportunity to comment. The proposed decision of the ALJ in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments by CFC were filed on August 2, 2010. No reply comments were filed.

9. Assignment of Proceeding

Nancy Ryan is the assigned Commissioner and Timothy J. Sullivan is the assigned ALJ in this proceeding.

Findings of Fact

1. CFC has satisfied all the procedural requirements necessary to claim compensation in this proceeding.
2. CFC made a substantial contribution to D.09-12-046 as described herein.
3. CFC requested hourly rates for its representatives that are reasonable when compared to the market rates for persons with similar training and experience.
4. The total of the reasonable compensation is \$14,875.00.

5. Appendix to this decision summarizes today's award.

Conclusions of Law

1. CFC has fulfilled the requirements of §§ 1801-1812, which govern awards of intervenor compensation, and is entitled to intervenor compensation for its claimed expenses, as adjusted herein, incurred in making substantial contributions to D.09-12-046.

2. CFC should be awarded \$14,875.00 for its contribution to D.09-12-046.

3. This order should be effective today so that CFC may be compensated without further delay.

O R D E R

IT IS ORDERED that:

1. Consumer Federation of California is awarded \$14,875.00 as compensation for its substantial contributions to Decision 09-12-046.

2. Within 30 days of the effective date of this decision, Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall pay Consumer Federation of California their respective shares of the award. We direct Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company to allocate payment responsibility among themselves, based on their California-jurisdictional electric revenues for the 2009 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award

shall include interest at the rate earned on prime, three-month commercial paper as reported in Federal Reserve Statistical Release H.15, beginning May 8, 2010, the 75th day after the filing date of Consumer Federation of California's request for compensation, and continuing until full payment is made.

This order is effective today.

Dated August 12, 2010, at San Francisco, California.

MICHAEL R. PEEVEY

President

DIAN M. GRUENEICH

JOHN A. BOHN

TIMOTHY ALAN SIMON

NANCY E. RYAN

Commissioners

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D1008017	Modifies Decision? No
Contribution Decision:	D0912046	
Proceeding(s):	R0812009	
Author:	ALJ Sullivan	
Payers:	Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company.	

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier	Reason Change/Disallowance
Consumer Federation of California	2/19/10	\$25,466	\$14,875	No	Unproductive effort, lack of substantial contributions, and excessive hours

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Alexis	Wodtke	Attorney	Consumer Federation of California	\$350	2008	\$350
Alexis	Wodtke	Attorney	Consumer Federation of California	\$350	2009	\$350
Alexis	Wodtke	Attorney	Consumer Federation of California	\$350	2010	\$350

(END OF APPENDIX)

