

Decision \_\_\_\_\_

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

<p><b>Order Instituting Rulemaking on the Commission's Own Motion to Consider Revising Energy Utility Tariff Rules Related to Deposits and Adjusting Bills as They Affect Small Business Customers</b></p>	<p><b>Rulemaking 10-05-005</b></p>
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**CLAIM AND DECISION ON REQUEST FOR INTERVENOR COMPENSATION**

<p><b>Claimant: The Greenlining Institute</b></p>	<p><b>For contribution to D.10-10-032</b></p>		
<p><b>Claimed (\$): \$9,299.75</b></p>	<p><b>Awarded (\$):</b></p>		
<p><b>Assigned Commissioner: Bohn</b></p>	<p><b>Assigned ALJ: Bruce DeBerry</b></p>		
<p>I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).</p>			
<p style="text-align: right;"><b>Signature:</b> /s/ <b>Stephanie C. Chen</b></p>			
<p><b>Date:</b></p>	<p><b>December 21, 2010</b></p>	<p><b>Printed Name:</b></p>	<p><b>Stephanie C. Chen</b></p>

**PART I: PROCEDURAL ISSUES** (to be completed by Claimant except where indicated)

**A. Brief Description of Decision:**

The Decision revised certain tariff rules for “small business” customers of electric and gas utilities. The Decision first defined eligible “small business” customers, then amended certain tariff provisions governing back-billing in the case of billing or metering errors, amount of deposits required, billing vs. metering errors, and service discontinuation notice requirements.

**B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:**

	<b>Claimant</b>	<b>CPUC Verified</b>
<b>Timely filing of notice of intent to claim compensation (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	N/A	
2. Other Specified Date for NOI:	June 11, 2010	
3. Date NOI Filed:	June 11, 2010	
4. Was the notice of intent timely filed?		
<b>Showing of customer or customer-related status (§ 1802(b)):</b>		
5. Based on ALJ ruling issued in proceeding number:	R.10-02-005	
6. Date of ALJ ruling:	March 29, 2010	
7. Based on another CPUC determination (specify):		
8. Has the claimant demonstrated customer or customer-related status?		
<b>Showing of "significant financial hardship" (§ 1802(g)):</b>		
9. Based on ALJ ruling issued in proceeding number:		
10. Date of ALJ ruling:		
11. Based on another CPUC determination (specify):	See § I(C) below.	
12. Has the claimant demonstrated significant financial hardship?		
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision	D.10-10-032	
14. Date of Issuance of Final Decision:	October 28, 2010	
15. File date of compensation request:	December 20, 2010	
16. Was the request for compensation timely?		

**C. Additional Comments on Part I (use line reference # as appropriate):**

<b>#</b>	<b>Claimant</b>	<b>CPUC</b>	<b>Comment</b>
5-10	X		Greenlining filed its Notice of Intent on June 11, 2010, pursuant to an email sent by ALJ Darling to the service list on June 17th. However, as of the filing date of this

		<p>request, the ALJ has yet to issue a ruling on the NOI. Greenlining’s showing of customer status and financial hardship was contained in the NOI.</p> <p>As to the instant request, Greenlining was found to satisfy the requisite showing of customer status within the last year, as indicated above at lines 5-6. This finding was based on an original showing.</p> <p>However, it has come to our attention that all of Greenlining’s determinations with respect to financial hardship within the last calendar year have been rebuttable presumptions based on prior rulings. As such, below we include a demonstration of financial hardship on the merits, for the Commission’s consideration in the instant request.</p>
11	X	<p>Greenlining is an organization authorized in its Articles of Incorporation to represent the interests of both residential and small commercial electric and gas customers, with particular focus on low-income and of-color communities and customers. A copy of Greenlining’s Articles of Incorporation was previously filed with the Commission (as Attachment 2 to our NOI, filed on March 5, 2010, for R.10-02-005). As such, Greenlining is a Category 3 customer as defined in D.98-04-059.</p> <p>As a Category 3 customer, Greenlining must satisfy the “comparison test” by demonstrating that the economic interest of its members and constituencies in the instant proceeding is small relative to the cost of effective participation in the proceeding. Greenlining submits that it satisfies this test.</p> <p>In the instant proceeding, the benefits to small businesses successfully achieved by Greenlining’s advocacy will only accrue to those facing certain circumstances: those who have been over- or under-billed, and those who might otherwise need to re-establish credit with the utility. When they do, however, those benefits could save the business hundreds or even thousands of dollars, which to a small business buffeted by today’s economic storm could mean the difference between survival and closing.</p> <p>However, even a few thousand dollars of benefit is less than the cost of full, effective, informed participation in a Commission proceeding, even under the most expedient of circumstances. As set forth below, full participation costs several thousand dollars. As such, it would be uneconomical for an individual small business to participate in the proceeding the way Greenlining did, especially assuming a lack of procedural expertise. However, the collective benefits to small businesses that will accumulate over the years justify the cost of Greenlining’s participation, as discussed in greater detail below.</p> <p>Because the cost of participation exceeds the financial benefit to be reaped by individual small business customers, Greenlining satisfies the “comparison test” as described above. In satisfying this test, Greenlining submits that it has successfully demonstrated significant financial hardship as appropriate for a Category 3 customer.</p>



**PART II: SUBSTANTIAL CONTRIBUTION** (to be completed by Claimant except where indicated)

**A. In the fields below, describe in a concise manner Claimant’s contribution to the final decision** (see § 1802(i), § 1803(a) & D.98-04-059) (For each contribution, support with specific reference to final or record.)

Contribution	Citation to Decision or Record	Showing Accepted by CPUC
<p><b>Issue A – Definition of Small Business</b></p> <p>Greenlining was the first party to propose the hybrid approach adopted in the decision, that would allow a customer to establish eligibility based on either usage or satisfaction of the Government Code definition of micro-business (with help from the Sempra Energy Utilities, which provided input on what specific level of usage would be an appropriate demarcation point). (Reply Comments on the OIR, filed June 28, p. 3; Opening Comments on the Business and Community Outreach (“BCO”) Staff Workshop Report, pp. 2-3; Reply Comments on the BCO Staff Workshop Report, pp. 2-3; Opening Comments on the Proposed Decision, p. 2; Reply Comments on the PD, pp. 2-3)</p>	<p>D.10-10-032 (“Decision”) defines a small business customer for purposes of its provisions as a) a non-residential electric customer using no more than 40,000 kWh/year, or with a demand of 20 kW or less; or b) a non-residential gas customer using no more than 10,000 therms per year; or c) a non-residential customer who meets the definition of “micro-business” as provided in CA Government Code Section 14837. (p. 1 fn. 1; p. 7; p. 13 Findings of Fact (“FOFs”) 1, 2, and 3; pp. 14-15 Ordering Paragraph (“OP”) 1; p. 16 OP 3)</p>	
<p><b>Issue B – Back-Billing</b></p> <p>In response to the OIR, when the question was whether a small business should be treated like a residential customer with respect to back-billing, Greenlining argued that it should, which in this instance meant a back-billing period of only three months, consistent with residential tariffs. (Opening Comments on the OIR, filed June 14, pp. 5-6; Reply Comments on the OIR, pp. 3-4; Opening Comments</p>	<p>When a small business has been inadvertently under-billed, D.10-10-032 reduced the maximum period of time for which back-billing is allowed from three years to three months. (p. 8; p. 13 FOFs 5 and 6; pp. 14-15 OP 1.a)</p>	

<p>on the BCO Staff Report, pp. 3-4; Opening Comments on the PD, pp. 2-3; Reply Comments on the PD, p. 3).</p> <p>When the Staff Report on the Workshop was issued, Greenlining supported its recommendation that back-billing should be limited to 3 months, and that slow-payment of a back-billed amount should not trigger a reestablishment of credit deposit. (Opening Comments on the BCO Staff Report, pp. 3-4; Opening Comments on the PD, pp. 2-3; Reply Comments on the PD, pp. 3-4)</p>	<p>In declining to waive all re-establishment of service deposits, the Decision did make an exception for instances in which “re-establishment of service is due to failure to pay charges related to back-billing. (p. 9; p. 13 FOF 11; pp. 14-15 OP 1.d)</p>	
<p><b>Issue C – Refunds</b></p> <p>From the outset, Greenlining noted the tenuous and often inconsistent distinction between billing errors and metering errors, and recommended that both be treated the same, with a maximum refund period of three years. (Opening Comments on the OIR, p. 7; Reply Comments on the OIR, p. 5; Reply Comments on the BCO Staff Report, p. 3; Opening Comments on the PD, p. 3)</p>	<p>D.10-10-032 modifies the refund period for metering errors from 6 months to 3 years, to be consistent with the refund period for billing errors. (p. 8; pp. 14-15 OP 1.c)</p>	
<p><b>Issue D – Deposit Amounts</b></p> <p>Greenlining initially proposed that reestablishment of credit deposits be waived at least for the duration of the rulemaking process, as was the case for residential customers at the time comments were filed. (Opening Comments on the OIR, pp. 8-9)</p>	<p>D.10-10-032 reduced small business deposits from twice the maximum to twice the average monthly bill. In so doing, it specifically noted Greenlining’s argument that businesses may have aberrant spikes in their usage over the course of a year, and that it would be unreasonable to base a customer’s deposit on one unusually high-usage month. (pp. 8-9; p. 13 FOFs 7 and 8; pp. 14-15, OP 1.b)</p>	



<p>Greenlining further submitted that reestablishment of credit deposits should be waived for small businesses, and that establishment of credit deposits should be limited to twice the average monthly bill, rather than twice the maximum, to bring policies for small businesses in line with those for residential customers. In the alternative, should the Commission find that reestablishment of credit deposits are necessary, Greenlining argued that they too should be limited to twice the average monthly bill, instead of twice the maximum. (Reply Comments on the OIR, pp. 5-6; Opening Comments on the BCO Staff Report, pp. 4-6; Reply Comments on the BCO Staff Report, pp. 4-5; Opening Comments on the PD, pp. 3-6; Reply Comments on the PD, pp. 3-4)</p> <p>Greenlining advocated for the availability of alternatives to cash deposits, such as direct pay plans, etc. (Opening Comments on the BCO Staff Report, pp. 4-6; Opening Comments on the PD, pp. 3-4; Reply Comments on the PD, p. 4)</p>	<p>The Decision declined to waive all re-establishment of credit deposits, but did eliminate them when the need to re-establish credit was based on slow-payment or non-payment of a back-billed amount resulting from a billing or metering error. (p. 9; p. 13 FOF 11; pp. 14-15 OP 1.d)</p> <p>The Decision also recommends, but does not require, alternative credit mechanisms in lieu of deposits, such as automatic or direct pay plans. (p. 9; p. 13 FOF 9; pp. 14-15, OP 1.b)</p>	
<p><b>Issue E – Sunset Date</b></p> <p>This issue arose mid-proceeding, when it was proposed by some of the utility parties in response to the BCO Staff Workshop Report, and subsequently denied in the Proposed Decision. In response to the PD, Greenlining supported the Commission in declining to impose a sunset date, providing more in-depth reasoning in Reply Comments. (Opening Comments on the PD, p. 6; Reply Comments on the PD, pp. 4-5)</p>	<p>D.10-10-032 found it would be inappropriate to set a sunset date for the Decision’s provisions, owing to the difficulties in running a small business, especially during an economic slump of unpredictable duration. It also noted that as a matter of ongoing policy, it is appropriate to treat small business customers like residential customers in the event of back-billing, because small businesses cannot pay large back-bills on short notice, and are generally unable to detect or prevent potential billing or</p>	

	metering errors. The Decision specifically cited Greenlining’s contribution on p. 11. (pp. 10-11; p. 14 FOFs 13-16; p. 16 OP 4)	
<p><b>Issue F – Cost Recovery</b></p> <p>The Decision specifically notes Greenlining’s argument (along with that of DRA) that the cost impacts will likely be minimal, and that the GRC is the best mechanism for cost recovery. As such, it adopted Greenlining’s argument on this point without modification. (Reply Comments on the BCO Staff Report, p. 5; Opening Comments on the PD, p. 6; Reply Comments on the PD, p. 5)</p>	<p>D.10-10-032 noted that since the measures adopted elsewhere in the decision are new, there is little information available to assist in estimating their potential costs. However, the decision expressly does not anticipate major financial impact as a result of implementing its provisions, and allows the utilities to request any additional funds they believe are necessary in their GRCs. (pp. 11-12; p. 14 FOF 17)</p>	

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

	<b>Claimant</b>	<b>CPUC Verified</b>
<b>a. Was DRA a party to the proceeding? (Y/N)</b>	<b>Yes</b>	
<b>b. Were there other parties to the proceeding? (Y/N)</b>	<b>Yes</b>	
<b>c. If so, provide names of other parties:</b> Southwest Gas Company, Golden State Water Company, Pacific Gas & Electric Company, Pacificorp, Southern California Edison Company, Southern California Gas Company, San Diego Gas & Electric Company, The Utility Reform Network (TURN), California Small Business Roundtable / California Small Business Association (CSBRT/CSBA).		
<p><b>d. Describe how you coordinated with DRA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party:</b></p> <p>Greenlining coordinated with the Division of Ratepayer Advocates and with other consumer advocates to ensure that our efforts were not duplicated. Where our issues overlapped, we sought to coordinate strategies to minimize duplication and maximize efficacy. Specifically, Greenlining worked with DRA to compile a list</p>		

of questions to be asked of the utilities, to better assess the scope of the problems faced by small businesses and the potential impact of the proposed measures on utility operations and costs.

Further, much of the substantive progress that took place in this proceeding was galvanized in a workshop conducted by the Business and Community Outreach Staff midway through the proceeding. This exercise brought all interested parties to the table and helped to identify many points of agreement between parties. It allowed for face-to-face discussion of several options for small business assistance, many of which were adopted in the Decision. This collaborative effort helped to ensure that party efforts were streamlined and non-duplicative.

**C. Additional Comments on Part II** (use line reference # or letter as appropriate):

#	Claimant	CPUC	Comment
Part II(A)	X		There were aspects of Greenlining’s position that the Commission chose not to adopt. For example, Greenlining encouraged requiring the utilities to provide alternative credit mechanisms in addition to cash deposits. The Commission ultimately elected to encourage alternative credit mechanisms, rather than requiring them. (See Part II(A) above, Issue D) Even where the Commission did not ultimately agree with Greenlining’s position, the availability of alternatives for consideration provided a more full, robust debate on the issues at hand. This range of options and perspectives allows the Commission to reach a sound, well reasoned decision, and thus constitutes a substantial contribution to the record and the decision-making process.

**PART III: REASONABLENESS OF REQUESTED COMPENSATION** (to be completed by Claimant except where indicated)

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

Concise explanation as to how the cost of claimant’s participation bears a reasonable relationship with benefits realized through participation (include references to record, where appropriate)	CPUC Verified
<p>It is difficult to assign a precise dollar value to Greenlining’s participation. As mentioned above, it is difficult to predict how many small businesses might find themselves over- or under-billed in the years to come, and how much money the policies enacted in D.10-10-032 would save them. However, these policies will not sunset, so the benefits will continue to accrue to affected customers year after year.</p> <p>The benefits to small business customers who find themselves over- or under-billed will add up quickly in terms of dollars, but they will be</p>	



compounded by the impact of these dollars on the health of their business. Small businesses typically operate on a tight cash-flow cycle, and unexpected debts (such as those resulting from a long period of under-billing) could very well place the business' survival in jeopardy.

As such, Greenlining submits that the costs of its participation are reasonable because its benefits exceed its costs.

**B. Specific Claim:**

CLAIMED						CPUC AWARD			
<b>ATTORNEY AND ADVOCATE FEES</b>									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
Alicia Miller	2010	51.2	\$150	See Attachment A	\$7,680				
Stephanie Chen	2010	5.7	\$185	See Attachment A	\$1,054.50				
<b>Subtotal:</b>					<b>\$8,734.50</b>	<b>Subtotal:</b>			
<b>EXPERT FEES</b>									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
<b>Subtotal:</b>						<b>Subtotal:</b>			
<b>OTHER FEES</b>									
Describe here what OTHER HOURLY FEES you are claiming (paralegal, travel, etc.):									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
<b>Subtotal:</b>						<b>Subtotal:</b>			
<b>INTERVENOR COMPENSATION CLAIM PREPARATION **</b>									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
Alicia Miller	2010	1	\$75	See Attachment A	\$75				
Stephanie Chen	2010	5.3	\$92.50	See Attachment A	\$490.25				
<b>Subtotal:</b>					<b>\$565.25</b>	<b>Subtotal:</b>			
<b>COSTS</b>									
#	Item	Detail			Amount	Amount			

<b>Subtotal:</b>		<b>Subtotal:</b>	
<b>TOTAL REQUEST \$:</b>	<b>\$9,299.75</b>	<b>TOTAL AWARD \$:</b>	
<p>When entering items, type over bracketed text; add additional rows as necessary.          *If hourly rate based on CPUC decision, provide decision number; otherwise, attach rationale.          **Reasonable claim preparation time typically compensated at ½ of preparer’s normal hourly rate.</p>			

**C. Attachments or Comments Documenting Specific Claim** (Claimant completes; attachments not attached to final Decision):

Attachment or Comment #	Description/Comment
	Greenlining waives claims for costs.
<b>Attachment A</b>	<b>Basis for Rates Claimed in Section III.B</b>
<b>Attachment B</b>	<b>Allocation of Time by Issue</b>
<b>Attachment C</b>	<b>Time Recordkeeping for Greenlining’s Attorneys</b>
<b>Attachment 1</b>	<b>Certificate of Service</b>

**D. CPUC Disallowances & Adjustments** (CPUC completes):

#	Reason

**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))

(CPUC completes the remainder of this form)

**A. Opposition: Did any party oppose the claim (Y/N)?**

If so:

Party	Reason for Opposition	CPUC Disposition

**B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6)) (Y/N)?**

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If not:

Party	Comment	CPUC Disposition

**FINDINGS OF FACT**

1. Claimant [has/has not] made a substantial contribution to Decision (D.) \_\_\_\_\_.
2. The claimed fees and costs [, as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The total of reasonable contribution is \$ \_\_\_\_\_.

**CONCLUSION OF LAW**

1. The claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Public Utilities Code §§ 1801-1812.

**ORDER**

1. Claimant is awarded \$ \_\_\_\_\_.
2. Within 30 days of the effective date of this decision, \_\_\_\_\_ shall pay claimant the total award. 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 \_\_\_\_\_, 200\_\_, the 75<sup>th</sup> day after the filing of claimant’s request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.
4. [This/these] proceeding[s] [is/are] closed.
5. This decision is effective today.

Dated \_\_\_\_\_, at San Francisco, California.



## Attachment A

### **Basis for Rates Claimed in Section III.B**

#### **Stephanie Chen**

Stephanie Chen is currently Senior Legal Counsel for the Greenlining Institute. At the time of this proceeding, Ms. Chen was Legal Counsel. She has three years of experience appearing before the Commission in a variety of proceedings, including general rate cases. In D.10-11-029, the Commission set a rate of \$185 for Ms. Chen's work in 2010.

#### **Alicia Miller**

Alicia Miller is a Staff Attorney at the Greenlining Institute. Ms. Miller is a 2009 graduate of University of California Hastings College of the Law and has one year of experience. On December 13, 2010, the Proposed Decision of ALJ DeBerry Awarding Intervenor Compensation to the Greenlining Institute for Substantial Contribution to D.10-07-048 (in R.10-02-005) noted at p. 13 that a rate for \$150 was appropriate for Ms. Miller's work from June 2010 forward. As all of Ms. Miller's work in this proceeding occurred during or after June 2010, a rate of \$150 is appropriate for this claim.

## Attachment B

### Allocation of Time by Issue

In the foregoing time sheets, the attorneys worked on a number of specific issues as well as on general issues, identified below with a letter code.

The identification of each issue within the scope of the proceeding is discussed Part II.B, above, and in the attached attorney time records.

<b>Issue Areas (with letter code)</b>	<b>% of Time</b>
<b>General</b> (Time not properly allocable to the below categories, including reading Commission rulings and filings of other parties)	7.2%
<b>A. Definition of Small Business</b>	22.7%
<b>B. Back-Billing</b>	20.0%
<b>C. Refunds</b>	17.0%
<b>D. Deposit Amounts</b>	28.1%
<b>E. Sunset Date</b>	1.9%
<b>F. Cost Recovery</b>	3.0%

## Attachment C

### Time Recordkeeping for Greenlining's Attorneys

#### Hours of Alicia Miller, Staff Attorney, in 2010

Date	Explanation	General	A	B	C	D	E	F	Total
6/2/10	Review OIR		0.5	0.5	0.5	0.5			2
6/7/10	Discuss OIR, issues and strategy with J. Chung and E. Gallardo			0.2	0.2	0.1			0.5
6/9/10	Research and begin drafting comments		2	3	2	0			7
6/10/10	Finish drafting Opening Comments		0.3	1	1	2			4.3
6/11/10	Incorporate changes from S.Chen and send revised Comments to S.Kang for review.		0.1	0.3	0.3	0.3			1
6/14/10	Incorporate changes from S. Kang, finalize comments	0.3	0.8	0.7	0.4	0.3			2.5
6/21/10	Review Opening Comments of IOUs, DRA & TURN		0.7	0.2	0.4	0.2	0.1	0.1	1.7
6/23/10	Meeting with S.Kang re: strategy on reply comments	0.2							0.2
6/23/10	Draft Reply Comments		1	0.8	0.8	1.2			3.8
6/24/10	Meet with S.Chen to discuss Reply Comments	0.2							0.2
6/24/10	Finish Draft Reply Comments		0.5	0.2	0.5	0.3			1.5
7/2/10	Review parties' reply comments & prepare for workshop.		0.4	0.3	0.3	0.4			1.4
7/2/10	Discuss proceeding with S. Chen in preparation for workshop.	0.3							0.3
7/6/10	Attend Workshop		0.5	0.5	0.5	1			2.5
7/6/10	Debrief after workshop with S. Chen	0.2							0.2
7/8/10	Generate list of questions with DRA to be provided to the Small Business Outreach Office		0.1		0.1	0.1			0.3
7/28/10	Review Workshop Report		0.2	0.1	0.1	0.2			0.6
8/2/10	Draft Opening Comments to Workshop Report		1	0.5	0.2	1.3			3
8/3/10	Finalize Opening Comments to Workshop Report		0.2	0.2	0.2	0.4			1
8/16/10	Review all comments and prepare initial draft of reply comments on workshop report		0.6	0.4	0.5	1		0.5	3
8/17/10	Finalize reply comments to workshop report.	0.3	0.7	0.4	0.4	0.7		0.5	3
10/11/10	Review PD, research & draft opening comments.		0.6	0.6	0.4	1.8	0.2	0.2	3.8
10/12/10	Draft opening comments.		0.2	0.1	0.1	0.7	0.1	0.1	1.3



<b>Date</b>	<b>Explanation</b>	<b>General</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>F</b>	<b>Total</b>
10/15/10	Revise Opening Comments	0.3	0.2	0.1	0.1	0.7	0.1	0.1	<b>1.6</b>
10/22/10	Review parties' opening comments and draft reply comments.		1.4	0.5		1.3	0.6	0.2	<b>4</b>
10/25/10	Finalize reply comments to PD	0.3	0.1			0.1			<b>0.5</b>
<b>Issue Areas</b>		<b>General</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>F</b>	<b>Total</b>
<b>Total</b>		<b>2.1</b>	<b>12.1</b>	<b>10.6</b>	<b>9</b>	<b>14.6</b>	<b>1.1</b>	<b>1.7</b>	<b>51.2</b>

### Hours of Stephanie Chen, Legal Counsel, in 2010

<b>Date</b>	<b>Explanation</b>	<b>General</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>F</b>	<b>Total</b>
6/1/10	Reading OIR	0.4							<b>0.4</b>
6/10/10	Edits to A.Miller draft opening comments		0.1	0.1	0.1	0.1			<b>0.4</b>
6/24/10	Edits to A.Miller draft reply comments		0.2	0.1	0.1	0.2			<b>0.6</b>
6/24/10	Meet with A.Miller to discuss edits to reply comments	0.2							<b>0.2</b>
7/2/10	Discussing other parties' comments, preparing for 7/6 workshop, with A.Miller	0.3							<b>0.3</b>
7/6/10	All-party workshop		0.5	0.5	0.5	1			<b>2.5</b>
7/6/10	Debrief with A.Miller after all-party workshop	0.2							<b>0.2</b>
8/2/10	Edits to A.Miller draft opening comments on the staff workshop report	0.1		0.1		0.1			<b>0.3</b>
8/17/10	Edits to A.Miller draft reply comments on the staff workshop report	0.3							<b>0.3</b>
10/15/10	Edits to A.Miller draft opening comments on the PD	0.3							<b>0.3</b>
10/25/10	Edits to A.Miller draft reply comments on the PD	0.2							<b>0.2</b>
<b>Issue Areas</b>		<b>General</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>F</b>	<b>Total</b>
<b>Total</b>		<b>2</b>	<b>0.8</b>	<b>0.8</b>	<b>0.7</b>	<b>1.4</b>	<b>0</b>	<b>0</b>	<b>5.7</b>

**Hours of Alicia Miller, Staff Attorney, on Intervenor Compensation in 2010**

<b>Date</b>	<b>Explanation</b>	<b>Total</b>
12/6/2010	Work on intervenor compensation application	1
	<b>Total</b>	<b>1</b>

**Hours of Stephanie Chen, Legal Counsel, on Intervenor Compensation in 2010**

<b>Date</b>	<b>Explanation</b>	<b>Total</b>
12/13/2010	Preparing Intervenor Compensation Request	2.3
12/16/2010	Preparing Intervenor Compensation Request	0.9
12/19/2010	Completing and editing Intervenor Compensation Request	2.1
	<b>Total</b>	<b>5.3</b>

**Attachment 1:**

**Certificate of Service**

I hereby certify that I have this day served a copy of the foregoing **CLAIM AND ORDER ON REQUEST FOR INTERVENOR COMPENSATION** by (check as appropriate):

- hand delivery;
- first-class mail; and/or
- electronic mail

to the following parties appearing on the official Service List for R.10.05.005:

catherine.mazzeo@swgas.com	CPUCCASES@pge.com
fadia.khoury@sce.com	cem@newsdata.com
nquan@gswater.com	bkc7@pge.com
KHassan@SempraUtilities.com	regrelcpuccases@pge.com
map@cpuc.ca.gov	ROJ3@pge.com
nsuetake@turn.org	aliciam@greenlining.org
DFC2@pge.com	Mike@alpinenaturalgas.com
oshirock@pacbell.net	joyw@mid.org
michelle.mishoe@pacificorp.com	Ralf1241a@cs.com
GHealy@SempraUtilities.com	cmkehrein@ems-ca.com
stephaniec@greenlining.org	westgas@aol.com
don.soderberg@swgas.com	californiadockets@pacificorp.com
valerie.ontiveroz@swgas.com	ddm@cpuc.ca.gov
brooks.congdon@swgas.com	bmd@cpuc.ca.gov
tdillard@sppc.com	kwz@cpuc.ca.gov
case.admin@sce.com	kho@cpuc.ca.gov
rkmoore@gswater.com	lwt@cpuc.ca.gov
KSwitzer@gswater.com	zaf@cpuc.ca.gov
kderemer@semprautilities.com	sjg@cpuc.ca.gov

Executed this 21st day of December, 2010, at Berkeley, California.

/s/ Enrique Gallardo  
Enrique Gallardo  
The Greenlining Institute  
1918 University Ave, 2nd Floor  
Berkeley, CA 94704