

Agenda 웹□η ID 웹□η #

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Decision 웹□η D11-012, 웹□η D1048 웹□η  
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BEFORE 웹□η THE 웹□η PUBLIC 웹□η UTILITIES 웹□η COMMISSION 웹□η OF 웹□η THE 웹□η  
웹□η

Order 웹□η Instituting 웹□η Rulemaking 웹□η to 웹□η Implementation 웹□η and 웹□η Administration 웹□η Renewables 웹□η Portfolio 웹□η Standard 웹□η Pr

Rulemaking 웹□η D1005 웹□η  
(Filed 웹□η May 웹□η 2011)  
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CLAIM 웹□η AND 웹□η DECISION 웹□η ON 웹□η REQUEST 웹□η FOR 웹□η INTERVENOR 웹□η  
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Claimant: 웹□η Clean 웹□η Coal ID For 웹□η contribution 웹□η to 웹□η D1048 웹□η (formerly 웹□η the 웹□η FERC 웹□η 048 웹□η)	
Claimed 웹□η \$975 웹□η	Awarded 웹□η \$ 웹□η
Assigned 웹□η Commons 웹□η	Assigned 웹□η DeAngelis 웹□η
I 웹□η hereby 웹□η certify 웹□η that 웹□η the 웹□η information 웹□η I 웹□η have Claim 웹□η is 웹□η true 웹□η to 웹□η my 웹□η best 웹□η knowledge, 웹□η inform conformance 웹□η with 웹□η the 웹□η Rulemaking 웹□η of 웹□η this 웹□η day, 웹□η this 웹□η day 웹□η upon 웹□η all 웹□η required 웹□η persons 웹□η (as 웹□η set 웹□η <sup>1</sup> attached 웹□η as 웹□η Attachment 웹□η 1).	
Signature:	
Date: 12/30/ 2011	Printed 웹□η Tam 웹□η

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PART 웹□η I: 웹□η PROCEDURAL 웹□η ISSUES 웹□η (not yet completed 웹□η by 웹□η)

A. 웹□η 웹□η Brief 웹□η Description 웹□η Decision: 웹□η	D.11-11-012, 웹□η Initiated 웹□η the 웹□η Clean 웹□η C for 웹□η amendments 웹□η to 웹□η SCE's 웹□η DCR D.10-12-048, 웹□η Created 웹□η the 웹□η RAM 웹□η required 웹□η IOUs 웹□η to 웹□η sub 웹□η adv 웹□η
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Claimant	CPUC	Ve
Timely filing of notice of intent to proceed		
Filing Date: June 13, 2011		
1. Filing Date of proceeding:		
2. Filing Date of notice of intent to proceed:		
3. Filing Date of NOI Filed:	7/8/2011	
4. Was the notice of intent to proceed filed?	Yes	
Showing of customer related proceeding		
5. Based on ALJ proceeding:	Not yet	
6. Filing date of ALJ:	TBD	
7. Filing date of ruling:	Ruling forthcoming (specify):	
8. Has the claimant demonstrated related hardship?		
Showing of significant financial hardship		
9. Based on ALJ proceeding:	None	
10. Date of ruling:	July 2011	
11. On another CPUC proceeding (specify):		
12. Has the claimant demonstrated hardship?		
Timely request for compensation (§)		

13. 웹□η 웹□η Identify 웹□η Final 웹□η D	D.11-11-012, 웹□η 웹□η 012-0148 웹□η
14. 웹□η Date 웹□η of 웹□η Issuance 웹□η Nov. 웹□η 17, 웹□η 웹□η D.11-11-012 웹□η a Dec. 웹□η 16, 웹□η D.10-12-048 웹□η	
15. 웹□η File 웹□η date 웹□η of 웹□η 웹□η December 웹□η 웹□η 웹□η	
16. 웹□η Was 웹□η the 웹□η request 웹□η for 웹□η compensation 웹□η Yes 웹□η	

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**C. Additional 웹□η Comments 웹□η on 웹□η Part 웹□η I 웹□η (use 웹□η ~~Part II~~ 웹□η reference 웹□η #:**  
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#	Claimant	CPUC	Comment 웹□η
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**PART 웹□η II: 웹□η 웹□η SUBSTANTIAL 웹□η CONTRIBUTION 웹□η (to 웹□η ~~Part II~~ 웹□η completed indicated) 웹□η**  
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A. In 웹□η the 웹□η fields 웹□η below, 웹□η describe 웹□η in 웹□η a 웹□η concise 웹□η manner 웹□η decision 웹□η (see 웹□η § 웹□η 1802(i), ~~Part II~~ 웹□η 1803(1)(b) & 1803(1)(c) contribution, 웹□η si specific 웹□η reference 웹□η final 웹□η record.)

#### A. 웹□η

Contribution 웹□η	Citation 웹□η Decision 웹□η	Showing 웹□η Accepted 웹□η CPUC 웹□η
<b>D.11-11-012-012 (CREST motion)</b>	웹□η	웹□η
<ul style="list-style-type: none"> <li>The 웹□η Clean 웹□η Coalition has a 웹□η on 웹□η to 웹□η revise 웹□η CREST 웹□η program 웹□η PPA submitted 웹□η comments 웹□η reply 웹□η comments 웹□η on Decision. 웹□η We 웹□η submit motion 웹□η after 웹□η learnin</li> </ul>	<p>The 웹□η Commission 웹□η agreed to hear 웹□η our 웹□η and sided with the Clean 웹□η Coalition 웹□η on 웹□η its final decision summarizing 웹□η (p. 웹□η 2): 웹□η “grants, 웹□η with 웹□η modifications motion 웹□η by 웹□η Clean 웹□η Coa</p>	웹□η

<p>many developers in the feed-in tariff program wasn't working. Developers and advocates like the Clean Coalition had tried to work with SCE over two years to implement a program, but abandoned this decision. This prompted the Clean Coalition's mother organization, so their contribution in this clear.</p>	<p><i>Motion of the Clean Coalition for Immediate Amendments to the CREST Power Purchase Agreement</i></p> <p>Clean Coalition's motion changes to the South Edison Company's (SCE) Renewable Energy Small Power Purchase Agreement so that small renewable energy companies can accept federal cash grants under the American Recovery and Reinvestment Tax Act projects. We direct the advice letter to, changes, (1) modify the (Date of Initial Operation Section (4.3)) (Term and Termination); (Term and Termination); Section 12 (Assignment); remove Section 14.1 (future modifications) and Section 14.4 (for modifications); new contract sections, Majeure, Indication, Curtailment, and Collateral Requirements. We have a certain matters regarding interconnection."</p>
<p><b>D.1012048 (RAM decision)</b> is important to the Clean Coalition was known as the referred to as such decision.)</p>	<p>the Decision states (62): "For the initial we adopt the recommendation to the requirements the IOUs to provide "available capacity" at the substation and the circuit which we define as capacity minus the na</p>
<ul style="list-style-type: none"> <li>Made recommendations to IOU data sharing requirements re interconnection</li> </ul>	<p>The Decision states (62): "For the initial we adopt the recommendation to the requirements the IOUs to provide "available capacity" at the substation and the circuit which we define as capacity minus the na</p>

	<p>and queued capacity. IOUs should provide information in map detail. If unable to initially this level of detail, must provide the data most detailed level of work to increase precision of the information over time.</p>	
<ul style="list-style-type: none"> <li>Argued that requiring avoided cost bids accepted does not federal</li> </ul>	<p>The decision was made after comments on the proposed rule (§ 38): “PG&amp;E, NSCE, and that a requirement that bids up reflect market price set at the market premium 50% premium violates federal law. They violates state law which limitation on the IOUs’ procure renewable energy MPR costs. They violate federal law which would require them to power at a rate FIT Coalition, Solar, Solar Alliance and IE IOUs’ arguments about of the proposed decision example, Vote Solar IOUs’ arguments about and contends that their arguments are based on erroneous assumption that prices will exceed the states that the proposed does not violate federal law which would only set IOUs’ procurement of products and the the would be determined market mechanism. These proposed rules (§ 18-19):</p>	

	<p>would have required to solicit eligible projects and accept all bids from RAM up to the capacity of this on both federal and federal law issue is in this decision because the IOWS' discretion in instances of market non-competitive pricing due to other renewable opportunities. See details on project.</p>
<ul style="list-style-type: none"> <li>Recommended program</li> </ul>	<p>The decision did our recommendation (line 24): "In response to 1,000 MW capacity limit, Community College District Solar and others argue no cap. The Forum Alliance recommends a MW; Sierra Club recommends MW (with all FIT included); Coalition recommends a minimum of 1,000 per year); LA Community District and Voter limits no cap (i.e. unlimited).</p> <p>The decision (line 25): "Parties provide recommendations on the appropriate cap level, unlimited authorization, of FED's 1,000 MW have had mixed experience uncapped programs and adopt this expansion program limit, at least have some evidence. We decline to adopt</p>

	<p>no cap. The 1, to three IOUs is provide market opportunity being sufficiently small protection against bad the absence of a requirement cap, we DRA and First Solar nameplate capacity cap MW to be procured IOUs over the next may adjust our 1,000 time based on evidence and</p> <p><b>Conclusion</b></p>	
<ul style="list-style-type: none"> <li>Argued for increased transparency of prices</li> </ul>	<p>The decisions made by “Parties present that FIT Coordinators that revealed or the key identified by ED (i.e. provides that investment signal) will not provide</p> <p>The Commission made our recommendations (p. expect ED, respondents, to explore all reason make price and no the widely available. At require specific information publicly. received and shortlisted, the IOUs to provide information: names of companies and the number per company; number received and shortlisted; size, operating technologies, quantitative summary of projects passed each viability screen, and by county. Finally, the IOUs much information on the basis</p>	

	project 웹□▷development 웹□▷for 웹□▷all 웹□▷executed 웹□▷RAM 웹□▷co	
<b>Resolution 2014 RAM 020 advice to letters</b>	웹□▷	웹□▷
The 웹□▷IOUs 웹□▷submitted letters 웹□▷to 웹□▷implement program 웹□▷and 웹□▷the 웹□▷Coalition 웹□▷submitted 웹□▷substantial 웹□▷comme 웹□▷protests 웹□▷the SCE's 웹□▷an letters. 웹□▷the Commission 웹□▷agreed 웹□▷with 웹□▷all 웹□▷Clean 웹□▷Coalition's 웹□▷recommendations. 웹□▷	웹□▷	웹□▷
Argued 웹□▷that 웹□▷auction should 웹□▷remain 웹□▷at 웹□▷	The 웹□▷resolution 웹□▷states 웹□▷Decision 웹□▷directs 웹□▷the 웹□▷two 웹□▷auctions 웹□▷per 웹□▷call a 웹□▷new 웹□▷period. 웹□▷in 웹□▷letter, 웹□▷the SCE 웹□▷requests 웹□▷the Decision's 웹□▷requirement 웹□▷of two 웹□▷auctions 웹□▷per 웹□▷year auction 웹□▷per 웹□▷year. 웹□▷Silv this 웹□▷request 웹□▷while 웹□▷the S Clean 웹□▷Coalition, 웹□▷and 웹□▷oppose 웹□▷it." 웹□▷The 웹□▷resolution with 웹□▷the Coalition 웹□▷ai concludes 웹□▷(p. 웹□▷5): 웹□▷"Th hold 웹□▷an 웹□▷auction 웹□▷never. The 웹□▷first 웹□▷auction 웹□▷sha than 웹□▷November 웹□▷15, 웹□▷a second 웹□▷auction 웹□▷shall 웹□▷than 웹□▷May 웹□▷2011 웹□▷2012."	웹□▷
Argued 웹□▷full 웹□▷capacity deliverability 웹□▷not 웹□▷not required 웹□▷for 웹□▷RAM 웹□▷	The 웹□▷resolution 웹□▷initially 웹□▷stated 웹□▷with 웹□▷our 웹□▷added 웹□▷additional 웹□▷nuance 웹□▷by 웹□▷deliverability 웹□▷to 웹□▷be 웹□▷r could 웹□▷be 웹□▷secured 웹□▷at developer 웹□▷the 웹□▷IOUs 웹□▷not 웹□▷require 웹□▷the 웹□▷seller 웹□▷capacity 웹□▷deliverability 웹□▷state unless 웹□▷the 웹□▷seller 웹□▷can deliverability 웹□▷with 웹□▷no 웹□▷costs 웹□▷to 웹□▷the 웹□▷seller. 웹□▷not 웹□▷use 웹□▷achievement 웹□▷deliverability 웹□▷as 웹□▷a	웹□▷

	<p>project’s selection criterion they pre-set achievement capacity deliverability stated condition precedent to its operation.”</p>	
Opposed the use of upgrade maps	<p>The resolution agreed position (p. 18) reflected the estimated transmission upgrade costs resulting most recent interconnection to the seller’s price bids. NSCE and SDG&amp;E the transmission network cost caps from their protocols and contract.”</p>	Opposed
Argued that NSCE’s was not in compliance with D.10-12-048	<p>The resolution agreed stating (p. 21) agrees parties that NSCE’s may provide “available” capacity substation and circuit required in the Decision should provide a capacity at the subst. circuit level for its locations within 30 days of resolution.”</p>	Opposed
Argued that any 10% higher bid should be IOUs as unenforceable	<p>The resolution disagreed this (p. 25) purposefully did not determine terms so that the their discretion based nearly ten years of procuring renewable energy through a competitive result, the proposal is rejected.”</p>	Opposed
Argued that IOU forecasting requirements were too onerous	<p>in stating the shall work with more standardized requirements and the common language in the common required by this process. us, however, non our</p>	Opposed

<p>recommendation 웹□η(p. 웹□η32): Coalition 웹□ηstates 웹□ηthat 웹□η be 웹□ηresponsible 웹□ηfor 웹□ηfc Decision 웹□ηrejects 웹□ηrequire 웹□ηto be 웹□ηresponsible 웹□ηfor 웹□ηfc staff 웹□ηrejects 웹□ηthe 웹□ηClea proposal.”웹□η</p>	<p>The 웹□ηresolution 웹□ηagreed 웹□η Clean 웹□ηCoalition 웹□ηRAM 웹□η shall 웹□ηuse 웹□ηtake 웹□ηproceeding ordered 웹□ηin 웹□ηthe 웹□ηRAM, 33): 웹□ηI shall 웹□ηrequire 웹□η actual 웹□ηdamages 웹□ηand 웹□η damages 웹□ηbased 웹□ηon 웹□ηthe ceiling 웹□ηand 웹□ηfloor.”</p>
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B. Duplication 웹□ηof 웹□ηEffort 웹□η(\$§ 웹□η301.3(f) 웹□η& 웹□η1802.5):

웹□η	Claimant <sup>3</sup> CPUC 웹□ηve
a. 웹□ηas 웹□ηDRA 웹□ηa 웹□ηparty 웹□ηto 웹□ηthe 웹□η	웹□η
b. 웹□ηthe 웹□ηthere 웹□ηother 웹□ηparties 웹□ηto 웹□ηY 웹□η	웹□η
c. 웹□ηso, 웹□ηprovide 웹□ηname 웹□ηof 웹□ηother 웹□ηpa 웹□η	웹□η
D.1-11-012: 웹□ηments 웹□ηwere 웹□ηalso 웹□ηhundreds 웹□ηof 웹□η SunEdison. 웹□ηare 웹□ηalso 웹□ηnot 웹□ηsubmit 웹□η proceeding 웹□ηthat 웹□ηdid 웹□ηnot 웹□ηsubmit 웹□η listed 웹□ηin 웹□ηthe 웹□ηcertificate 웹□ηof 웹□ηservice 웹□η	
D.10-12-048: 웹□ηOn 웹□ηSeptember 웹□η27, 웹□η2010 웹□η CALSEA, 웹□ηCARE, 웹□ηCEERT, 웹□ηDRA, 웹□ηEnXco, 웹□η Energy, 웹□ηGPI, 웹□ηIEP, 웹□ηJan 웹□ηReid, 웹□ηLS 웹□η Energy, 웹□ηNSCE, 웹□ηSDG&E, 웹□ηSFRU, 웹□ηSierra 웹□ηCI Sustainable 웹□ηConservation, 웹□ηTURN 웹□ηand 웹□η 2010, 웹□ηJan 웹□ηComments 웹□ηwere 웹□ηfiled 웹□ηon 웹□η GPI, 웹□ηJan 웹□ηReid, 웹□ηLS 웹□ηPower 웹□ηAssociates, 웹□η Solar 웹□ηAlliance, 웹□ηSustainable 웹□ηConservation, 웹□η Walmart, 웹□ηand 웹□ηWestern 웹□ηPower 웹□ηEdLang 웹□η hundreds 웹□ηof 웹□ηof 웹□ηof 웹□ηof 웹□ηof 웹□ηof 웹□η comments 웹□ηon 웹□ηthe 웹□ηdecision.	

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d. **Describe** 웹□▷**how** 웹□▷**you** 웹□▷**coordinated** 웹□▷**with** 웹□▷**the** 웹□▷**other** 웹□▷**parties** 웹□▷**to avoid** 웹□▷**duplication** 웹□▷**or** 웹□▷**how** 웹□▷**your** 웹□▷**or** 웹□▷**contributed** 웹□▷**to** 웹□▷**the** 웹□▷**same** 웹□▷**work**

웹□▷**in**

The 웹□▷**Coalition's** 웹□▷**compensation** 웹□▷**in** 웹□▷**this** 웹□▷**proposal** 웹□▷**should** 웹□▷**not** 웹□▷**be** 웹□▷**reduced** 웹□▷**for** 웹□▷**the** 웹□▷**duplication** 웹□▷**parties.** 웹□▷**As** 웹□▷**I** **respect** 웹□▷**the** 웹□▷**rule** 웹□▷**that** 웹□▷**there** 웹□▷**was** 웹□▷**no** 웹□▷**duplication** 웹□▷**because** 웹□▷**the** 웹□▷**clean** 웹□▷**Coalition** 웹□▷**had** 웹□▷**the** 웹□▷**motion** 웹□▷**to** 웹□▷**reduce** 웹□▷**the** 웹□▷**same** 웹□▷**and** 웹□▷**in** 웹□▷**negotiating** 웹□▷**other** 웹□▷**parts** 웹□▷**of** 웹□▷**the**

With 웹□▷**the** 웹□▷**respective** 웹□▷**MR&F** 웹□▷**and** 웹□▷**the** 웹□▷**decision** 웹□▷**that** 웹□▷**was** 웹□▷**made** 웹□▷**in** which 웹□▷**the** 웹□▷**Clean** 웹□▷**Coalition** 웹□▷**is** 웹□▷**represented** 웹□▷**by** 웹□▷**multiple** 웹□▷**participants** 웹□▷**(and** 웹□▷**there** 웹□▷**proceeding)** 웹□▷**who** would 웹□▷**have** 웹□▷**been** 웹□▷**involved** 웹□▷**in** Coalition 웹□▷**completely** 웹□▷**to** avoid 웹□▷**some** 웹□▷**duplication** 웹□▷**parties.** 웹□▷**Moreover,** 웹□▷**the** 웹□▷**Commission** 웹□▷**has** be 웹□▷**practically** 웹□▷**unavoidable** 웹□▷**in** 웹□▷**a** 웹□▷**negotiating** 웹□▷**stakeholder** 웹□▷**groups** 웹□▷**are** 웹□▷**encouraged** 웹□▷**to** 웹□▷**proceed** In 웹□▷**this** 웹□▷**proposal** 웹□▷**that** 웹□▷**all** 웹□▷**reasonably** keep 웹□▷**such** 웹□▷**duplication** 웹□▷**to** 웹□▷**minimum,** 웹□▷**happen,** 웹□▷**hour** 웹□▷**work** 웹□▷**served** 웹□▷**to** 웹□▷**complement** the 웹□▷**other** 웹□▷**participants.** 웹□▷**In** 웹□▷**reviewing** 웹□▷**other** 웹□▷**parties'** note 웹□▷**that** Coalition's 웹□▷**members** 웹□▷**were** 웹□▷**sharing** 웹□▷**the** issues. 웹□▷**Moreover,** 웹□▷**the** 웹□▷**fact** 웹□▷**that** Coalition's 웹□▷**members** Coalition's 웹□▷**members** 웹□▷**innumerous** 웹□▷**times** 웹□▷**indicates** 웹□▷**nature** 웹□▷**of** 웹□▷**the** 웹□▷**problem** 웹□▷**in** 웹□▷**the**

In 웹□▷**summary,** 웹□▷**many** 웹□▷**incidental** 웹□▷**duplication** occurred 웹□▷**here** 웹□▷**should** 웹□▷**be** 웹□▷**found** 웹□▷**in** Coalition's 웹□▷**contribution** 웹□▷**to** 웹□▷**the** 웹□▷**proceeding** circumstances, 웹□▷**no** 웹□▷**reduction** 웹□▷**in** 웹□▷**our** 웹□▷**filtration** is 웹□▷**warra** 웹□▷**ted** 웹□▷**the**

웹□▷**in**

웹□▷**the**

웹□▷**other**

C. Additional 웹□▷**Comments** 웹□▷**on** 웹□▷**Part** 웹□▷**II** 웹□▷**(use** 웹□▷**line** 웹□▷**to** difference 웹□▷**#**

#	Claimant	CPUC <sup>3</sup>	Comment
1	웹□▷ <b>the</b>	웹□▷ <b>the</b>	
2	웹□▷ <b>the</b>	웹□▷ <b>the</b>	

웹□▷**in**

웹□▷**the**

웹□▷**other**

**PART 1: REQUESTED COMPENSATION**

**Claimant** 편의 **Requested Compensation** 편의 **Where** 편의 **(to)**

A. General 편의 **Claim** 편의 **Reasonableness** 편의 **Requested Compensation** 편의 **Where** 편의 **Indicated**)

Concise 편의 **I** **explanation** 편의 **has** 편의 **how** 편의 **the** 편의 **reasonableness** 편의 **of** 편의 **requested compensation** 편의 **where** 편의 **indicated**:

General 편의 **I** **bears** 편의 **a** 편의 **reasonable** 편의 **relati**  
realized 편의 **through** 편의 **participation** 편의 **in** **include** 편의 **where** 편의 **appropriate** 편의 **fees**)

<p>Concise 편의 <b>I</b> <b>explanation</b> 편의 <b>has</b> 편의 <b>how</b> 편의 <b>the</b> 편의 <b>reasonableness</b> 편의 <b>of</b> 편의 <b>requested compensation</b> 편의 <b>where</b> 편의 <b>indicated</b>:</p> <p>General 편의 <b>I</b> <b>bears</b> 편의 <a href="#">a reasonable participation in appropriate fees</a>)</p>	<p>CPUC 편의 <b>Regulation</b></p>
<p>With 편의 <b>I</b> <b>respect</b> 편의 <b>the</b> 편의 <b>1969 AB 1480</b> 편의 <b>the</b> 편의 <b>Clean</b> 편의 <b>efforts</b> 편의 <b>I</b> <b>were</b> 편의 <b>under</b> 편의 <b>directed</b> 편의 <b>at</b> 편의 <b>the</b> 편의 <b>SCE's</b> 편의 <b>umbrella</b>. 편의 <b>I</b> <b>AB</b> 편의 <b>CREST</b> 편의 <b>program</b> 편의 <b>and</b> 편의 <b>SCE</b> 편의 <b>was</b> 편의 <b>no</b> 편의 <b>in</b> 편의 <b>a</b> 편의 <b>way</b> 편의 <b>that</b> 편의 <b>the</b> 편의 <b>legislature</b> 편의 <b>construction</b> 편의 <b>of</b> 편의 <b>projects</b>. 편의 <b>I</b> <b>the</b> 편의 <b>Legislature</b> 편의 <b>AB</b> 편의 <b>1969</b> 편의 <b>program</b> 편의 <b>was</b> 편의 <b>good</b> 편의 <b>for</b> 편의 <b>required</b> 편의 <b>that</b> 편의 <b>these</b> 편의 <b>renewable</b> 편의 <b>fees</b> 편의 <b>to</b> 편의 <b>fix</b> 편의 <b>this</b> 편의 <b>SCE</b> 편의 <b>environmentally</b> 편의 <b>beneficial</b> 편의 <b>renewable</b> 편의 <b>for</b> 편의 <b>all</b> 편의 <b>ratepayers</b> 편의 <b>and</b> 편의 <b>taxpayers</b> 편의 <b>the</b> 편의 <b>benefits</b> 편의 <b>to</b> 편의 <b>these</b> 편의 <b>projects</b> 편의 <b>will</b> 편의 <b>not</b> 편의 <b>that</b> 편의 <b>Clean</b> 편의 <b>Coalition</b> 편의 <b>his</b> 편의 <b>seeking</b> 편의 <b>comments</b> 편의 <b>on</b> 편의 <b>the</b> 편의 <b>NSCE</b> 편의 <b>regulations</b> 편의 <b>letters</b>. 편의 <b>I</b> <b>similarly</b>, 편의 <b>responsible</b> 편의 <b>to</b> 편의 <b>the</b> 편의 <b>Clean</b> 편의 <b>efforts</b> 편의 <b>we</b> 편의 <b>claimed</b> 편의 <b>that</b> 편의 <b>ensuring</b> 편의 <b>burdensome</b> 편의 <b>program</b> 편의 <b>without</b> 편의 <b>overly</b> 편의 <b>efforts</b> 편의 <b>will</b> 편의 <b>tell</b> 편의 <b>our</b> 편의 <b>ratepayers</b> 편의 <b>that</b> 편의 <b>our</b> 편의 <b>efforts</b> 편의 <b>are</b> 편의 <b>very</b> 편의 <b>likely</b> 편의 <b>than</b> 편의 <b>offset</b> 편의 <b>by</b> 편의 <b>the</b> 편의 <b>requested</b> 편의 <b>compensation</b> 편의 <b>than</b> 편의 <b>we</b> 편의 <b>cannot</b> 편의 <b>know</b> 편의 <b>what</b> 편의 <b>the</b> 편의 <b>monetary</b> 편의 <b>benefit</b> 편의 <b>under</b> 편의 <b>the</b> 편의 <b>R</b> 편의 <b>is</b> 편의 <b>an</b> 편의 <b>auction</b> 편의 <b>program</b>, 편의 <b>but</b> 편의 <b>given</b> 편의 <b>by</b> 편의 <b>the</b> 편의 <b>Commission</b> 편의 <b>for</b> 편의 <b>this</b> 편의 <b>program</b> 편의 <b>ratepayers</b> 편의 <b>will</b> 편의 <b>realize</b> 편의 <b>good</b> 편의 <b>value.</b> 편의 <b>I</b></p>	

B. Specific 편의 **Claims** 편의 **Attachments** 편의 **Name** 편의 **Records**

<p>CLAIMED 편의 <b>I</b></p>	<p>CPUC 편의 <b>WARD</b> 편의 <b>Regulation</b></p>
<p>ATTORNEY 편의 <b>AND</b> 편의 <b>ADVO</b> 편의 <b>FEES</b></p>	

Item	Year	Hours	Rate	Basis	Total	Year	Hour	Rate	Total	
				Rate*			s			
Hunt <sup>1</sup>	2010	18.25	\$315	D.11-10-040 <sup>1</sup> D.08-04-010 <sup>1</sup>	\$5,749					
Hunt <sup>2</sup>	2011	35.5	\$330	D.11-10-040 and D.08-04-010	\$11,715					
Subtotal:					\$17,463	Subtotal:				

#### EXPERT FEES

Item	Year	Hours	Rate	Basis	Total	Year	Hour	Rate	Total	
				for			s			
Craig <sup>3</sup>	2010	4	\$175	D.08-04-010	\$700					
Lewis <sup>2</sup>										
Craig <sup>4</sup>	2011	12	\$185	D.08-04-010	\$2,220					
Lewis <sup>4</sup>										
Ted <sup>1</sup>	2010	9.75	\$165	D.08-04-010	\$1,609					
Ted <sup>2</sup>	2011	18.75	\$175	D.08-04-010	\$3,281					
Sahm <sup>1</sup>	2010	47.75	\$250	D.08-04-010	\$11,938					
White <sup>4</sup>										
Sahm <sup>2</sup>	2011	27.5	\$270	D.08-04-010	\$7,425					
White <sup>1</sup>										
Subtotal:					\$27,173	Subtotal:				

#### OTHER FEES

Describe here what OTHER HOURLY FEES<sup>5</sup> are being paid.

Item	Year	Hours	Rate	Basis	Total	Year	Hour	Rate	Total
				for			s		
Ko <sup>1</sup>									

<sup>1</sup> D.11-10-040 approved \$300 an hour for Hunt in 2009 and D.08-04-010 (p. 9) provides for a 5% annual increase each year within each level of experience (p. 8).

<sup>2</sup> Lewis has 6 years experience in the renewable energy field and over a decade of experience in the telecommunications field. Lewis is the Executive Director of the Clean Coalition.

<sup>3</sup> Ko is the Associate Executive Director of the Clean Coalition and has five years of experience in the renewable energy field, with previous experience in the IT field.

<sup>4</sup> White has 12 years of experience in the energy and clean air field and is the Clean Coalition's Policy Director.

Item	Year	Hours	Rate	Basis for	Total	Year	Hour	Rate	Total
Dyana Polk	2011	2.5	\$73 <sup>5</sup>	D.08-04-010	\$183				
Hunt	2011	9.75	\$175	D.11-10-040 and D.10-0408 010	\$1,155				
Subtotal:									\$1,338
COSTS									
#	Item	Detail	Amount	Amount					
			Subtotal:						
			TOTAL	\$45,975					TOTAL AWA
When entering time, enter bracketed text; add new line if multiple entries. If hourly rate based on CPUC decision, proportionate. **Reasonable claim preparation time typically compensates hourly rate.									

Item  
Comments

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

Attachment	Description/Comment
1	Certificate of Service
2	Time record

D. CPUC Disallowances & Adjustments (CPUC completes):

<sup>5</sup> Polk has two years of experience on CPUC matters, resulting in a rate of \$145 per hour, which divided by two is \$73.

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**PART 2 DISPOSITIONS AND COMMENTS**

Within 30 days after service of this claim, or any other party may file a response to

(CPUC completes the remainder of this for

A. If Opposition:

If

If

Party	Reason for opposition	CPUC Disposition
Opposition		
Opposition		

B. Comment Period: If waived (see Rule 1(6)) (Y/N)?

If

If

Party	Comment	CPUC Disposition
Opposition		
Opposition		

**FINDINGS OF FACT**

If

- Claimant [has/not] made a substantial contribution to
- The claimed fees and costs [as adjusted herein,] to experts and advocates having comparable training and similar experience.
- The total of reasonable compensation is \$\_\_\_\_\_.

If

**CONCLUSION OF LAW**

1. The [satiation requirements] claim, with any adjustment set forth above, satisfies the [Public Utilities Commission] requirements of the [§ 1801]

ORDER  
\_\_\_\_\_

1. Claimant is awarded \$ \_\_\_\_\_

2. Within 30 days of the effective date of this decision, award shall include interest month commercial paper as reported in the Federal Reserve beginning January 1, the filing of the claimant's full payment is made.
3. The comment period for today's decision is/is not
4. [This/these] proceeding[s] is/are closed.
5. This decision is effective to

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

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**VERIFICATION**

By

I, Tam, an Attorney for Coastal Trial Law, Inc., am authorized to make this verification. I have been retained by the Plaintiff, John Doe, to represent him in this matter. I believe the foregoing is true and accurate.

True,

I declare under penalty of perjury that the foregoing is true and accurate. I executed this declaration on March 1, 2011 at Santa Barbara, California.

True,

Tam

True, 

True,

True, Attorney for Coastal Trial Law, Inc.

True,