

Decision _____


BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans	Rulemaking 10-05-006 (Filed May 6, 2010)
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**INTERVENOR COMPENSATION CLAIM OF THE GREEN POWER INSTITUTE
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF THE GREEN
POWER INSTITUTE**

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Claimant: The Green Power Institute	For contribution to D.12-04-046
Claimed (\$): 204,367	Awarded (\$):
Assigned Commissioner: Pres. Peevey	Assigned ALJ: Peter Allen
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).	
Signature:	
Date: 6/18/12	Printed Name: Gregg Morris

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

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A. Brief Description of Decision:	D.12-04-046 – Decision on Track I and Rules Track III of the Long-Term Procurement Plan Proceeding and Approving Settlement. Decision approves the Settlement proposed by many of the parties, including the Green Power Institute (GPI), for the 10-year system plan, and makes various determinations on Track III rules, including IOU procurement of greenhouse-gas compliance products. This Decision is the culmination of not only R.10-05-006, but also its predecessor, R.08-02-007 (see note below).
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B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:

	Claimant	CPUC Verified	
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):			
4	1. Date of Prehearing Conference:	Feb. 28, 2011	
	2. Other Specified Date for NOI:	Aug. 13, 2010	
	3. Date NOI Filed:	Aug. 4, 2010	
	4. Was the NOI timely filed?		
Showing of customer or customer-related status (§ 1802(b)):			
5	5. Based on ALJ ruling issued in proceeding number:	R.10-05-006	
	6. Date of ALJ ruling:	March 16, 2011	
	7. Based on another CPUC determination (specify):		
	8. Has the Claimant demonstrated customer or customer-related status?		
Showing of "significant financial hardship" (§ 1802(g)):			
6	9. Based on ALJ ruling issued in proceeding number:	R.10-05-006	
	10. Date of ALJ ruling:	March 16, 2011	
	11. Based on another CPUC determination (specify):		
	12. Has the Claimant demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):			
7	13. Identify Final Decision:	D.12-04-046	
	14. Date of Issuance of Final Order or Decision:	April 24, 2012	
	15. File date of compensation request:	June 18, 2012	
	16. Was the request for compensation timely?		

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

#	Claimant	CPUC	Comment
8	Part I A. Brief Description of Decision		Decision D.12-04-046 is recorded in Proceeding R.10-05-006, but in fact it is the culmination of two successive Long-Term Procurement Proceedings (LTPP), R.08-02-007, and R.10-05-006. Instead of using R.08-02-007 to run the regular biennial round of LTPPs, that Proceeding was used to structure the next round, which came in R.10-05-006. R.08-02-007 was closed without a definitive decision, and the OIR for R.10-05-006 specified: "Contributions made during the pendency of R.08-02-007 to issues within the scope of this proceeding may be considered for compensation in this proceeding (OIR, pg. 27)." We are claiming hours from both proceedings in this Request.

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 the record.)

9	Contribution	Specific References to Claimant’s Presentations and to Decision	Showing Accepted by CPUC
	<p>1. System Track I: System need determination. The overall goal of the LTPP process is to determine the need for new generating capacity to serve the Commission-jurisdictional electricity system over the 10-year planning horizon.</p>	<p>It is difficult to tie many of the Substantial Contributions we are claiming in Proceedings R.08-02-007 and R.10-05-006 directly to Decision D.12-04-046, because the Settlement that was adopted in the Decision, of which we were a signatory, subsumed many of these Contributions. The Settlement, as the Decision itself says, was in many respects a punt. The parties to the Settlement agreed that the analyses that had been performed to that date had not yet reached a definitive conclusion, and that the analyses should be continued under the auspices of the next LTPP cycle, which at this point is already in progress (R.12-03-014). The Settlement also came to the agreement that there was no finding of need for new fossil-generating capacity that requires attention before the 2012 LTPP cycle can be completed. This most essential conclusion of the Settlement is discussed in D.12-04-046 on pages 5-12. The Substantial Contribution of the GPI is highlighted in this discussion, which includes a full paragraph quoted directly from our Brief (see D.12-04-046, pg. 9).</p> <p>The Settlement would not have been possible without the very great amount of analytical work that had been performed prior to the Settlement effort. Indeed, in our opinion the settlement effort was launched in reaction to the preliminary results that were being generated by the CAISO. In any case, for purposes of this Claim for Intervenor Compensation, many of the Substantial Contributions in our Claim contributed to the analyses that were conducted prior to the Settlement, and thus became incorporated into the Settlement. But they are not discussed explicitly in the Decision, and thus it is impossible to make specific references to the Decision in discussing many of these Substantial Contributions, beyond the fact that</p>	

	<p>the Substantial Contributions contributed to the analyses that led to the Settlement that was adopted in the Decision. We ask the Commission to consider this discussion of our Substantial Contributions with this understanding in mind. Note that a listing of GPI Pleadings in R.08-02-007 and R.10-05-006 is provided in Attachment 2.</p>	
<p>2. System Track I: Analysis of environment risks, including greenhouse-gas uncertainty. The initial focus in R.08-02-007 was on understanding how to factor the uncertainty surrounding greenhouse-gas emissions and their costs into the long-term planning process. More generally, assessing the overall environment impacts of various supply options was an important component of the planning standards, which were developed in R.08-02-007, and used in R.10-05-006.</p>	<p>The first major topic taken up in R.08-02-007 was the uncertainty that at that time (mid-2008) lurked over the shoulders of electricity-market prognosticators. AB 32 had passed in 2006, and its mode of implementation was in the early stages of development. The GPI, which was an active party in the Commission’s GHG proceeding, R.06-04-009, contributed pleadings, and participated in a workshop on greenhouse-gas risks for procurement in R.08-02-007.</p> <p>Later in R.08-02-007, an interagency working group was formed in order to formulate an environmental ranking system for use in the RPS scenario analysis. The GPI participated actively in workshops and contributed pleadings on the formulation and application of this methodology. We acted as bioenergy expert to the working group, providing data and analysis to the process.</p> <p>Environmental considerations were prominent contributors to the Planning Standards that were formulated in R.08-02-007, and that guided the analysis performed for the 2010 LTPPs in R.10-05-006. The GPI made Substantial Contributions to the environmental ranking methodology, and to the handling of greenhouse-gas risk, in the adopted Planning Standards.</p>	
<p>3. System Track I: 33% RPS Implementation Analysis. One major activities undertaken in R.08-02-007 was</p>	<p>One major focus of the initial phase of R.08-02-007 was the performance of a 33% implementation analysis for renewables.</p>	

<p>the pursuit of a 33% renewables implementation study, which would inform the overall procurement analysis to be undertaken in the 2010 LTPPs.</p>	<p>This was a major effort, for which the Commission formed a working group, and used the services of a contractor to construct a detailed model and conduct the study. The 33% implementation study largely built on the work of RETI. GPI Director Gregg Morris was a member of the RETI board, and brought this knowledge and expertise to the 33% implementation study that was conducted as part of R.08-02-007.</p> <p>The GPI was an active participant in the 33% implementation working group, and provided a variety of pleadings in response to Commission data requests, in addition to providing comments on the draft 33% implementation report that resulted from the process. We made many significant contributions to the final report, which became part of the foundation for the LTPP planning standards that were developed for R.10-05-006.</p>	
<p>4. System Track I: Inputs, Metrics, & Scenarios. One of the major objectives in R.08-02-007 was on the development of a common set of inputs, metrics, and scenarios that all of the IOUs would use in the development of their LTPPs.</p>	<p>As R.08-02-007 progressed, the effort was focused on the ultimate objective of developing a workplan and planning standards for the next round of the LTPPs, which was to begin in 2010. One of the important inputs to the development of planning standards is the development of a common set of inputs, metrics, and scenarios.</p> <p>The GPI played an active role in the process of developing the common set of inputs, metrics, and scenarios. We participated in a workshop and provided pleadings on the topic of inputs, metrics and scenarios. In particular, we assisted staff and the contractor in developing the input data for bioenergy technologies, and we assisted in the development of the set of renewables scenarios that were used in the analysis that was carried out during R.10-05-006.</p>	
<p>5. System Track I: LTPP Work Plan. The</p>	<p>The final major activity that was carried out</p>	

<p>final substantive activity in R.08-02-007 was the development of a planning document to guide the utilities in the development of their 2010 LTPPs.</p>	<p>in R.08-02-007, during the second half of 2009, was the development of a work plan for the 2010 LTPPs. A July 2009 staff proposal framed the debate. The GPI was an active party to the process. We provided pleadings and participated in workshops, providing our knowledge and perspective on a variety of renewable energy issues.</p>	
<p>6. System Track I: Development of RPS planning standards. The first major activity in the 2010 LTPP proceeding, R.10-05-006, was the development of RPS planning standards for use in the 33% integration analysis.</p>	<p>The initial activity undertaken in R.10-05-006, the 2010 LTPP proceeding, was the finalization of RPS planning standards that were used in the RPS integration analysis that was at the heart of the LTPPs. This was, in effect, a continuation of work that was conducted in R.08-02-007.</p> <p>The GPI was an active participant in the RPS planning standards development process. We acted as the de facto expert on biomass power systems, and provided our expertise on renewables across the board. We provided pleadings and participated in workshops on the development of the planning standards.</p>	
<p>7. System Track I: RPS integration analysis. The major analytical activity undertaken in the 2010 LTPPs was the RPS integration analysis. The analysis was conducted by the CAISO, with assistance from the utilities, contractors and parties, in a process that encouraged transparency and public participation.</p>	<p>The major analytical focus of the 2010 LTPPs was the performance of a comprehensive RPS integration analysis, which looked at system balancing needs on a system with 33-percent renewables. Four major RPS scenarios were constructed and subjected to detailed analysis in order to study what, if any, needs could be identified for new generating capacity for purposes of renewables integration. In addition to the four Commission-developed scenarios, the IOUs developed and analyzed their own scenarios, which they added to the mix of information under consideration.</p> <p>The GPI was an active participant in the entire process of conducting the integration analysis. We provided pleadings, and participated in workshops on the progress of the analysis. The very extensive modeling</p>	

	<p>effort being conducted by the CAISO fell increasingly behind schedule, until it became clear that it would not be able to be fully completed in time to support the timely completion of the 2010 LTTPs. Nevertheless, preliminary results were developed and shared, and became part of the record of this proceeding.</p> <p>The GPI made many Significant Contributions to the renewables integration study, including helping to develop the four RPS scenarios that were used for the analysis, arguing for the development of a broader range of scenarios for future rounds of the LTTPs, and arguing for the inclusion of considerations of future technologies, like storage and smart grid, that could fundamentally alter the way the grid is operated, and the need for new integration resources. Not all of our suggestions were incorporated into the analysis, but all added to the breadth of the record, and helped to inform the analysis.</p>	
<p>8. System Track I and Rules Track III: Testimony, Hearings, Settlement, and Briefs on the 2010 LTTPs. CAISO and the IOUs filed Testimonies in Tracks I & III on July 1, 2011. This triggered the review process (parties' testimonies, settlement efforts, hearings, briefs) that led to the final decision that approved the 2010 LTTPs.</p>	<p>Once CAISO and the utilities filed their Testimonies on the 2010 LTTPs, the parties began the process of reviewing and analyzing the filings, preparing their own Testimonies, preparation for and participation in formal Hearings, and preparation of Opening and Reply Briefs. The entire process became complicated by the fact that, late in the process of preparing parties' Testimonies, many of the active parties, including the GPI, entered into a Settlement agreement that was eventually adopted in D.12-04-046.</p> <p>As an active participant to the entire 2010 LTTP development process, the GPI was an active participant in this concluding phase of the process. We prepared Testimony, participated in the Hearings, and filed Opening and Reply Briefs in the docket.</p> <p>Our primary Substantial Contribution to</p>	

	D.12-04-046 during the pre- through post-Hearing process was to be a sponsoring party to the Settlement agreement, which is adopted in D.12-04-046. We also made a Substantial Contribution to the Rules Track III portion of the case on the issue of procurement of greenhouse-gas products (emissions allowances, offsets). Our efforts helped to bring a higher level of transparency into the process, and set initial rules for the procurement of these products that are on the cautious side, which is appropriate for this nascent market.	
9. System Track I and Rules Track III: Review and Comment on the Proposed Decision on Tracks I & III of the 2010 LTPPs.	The GPI filed Comments and Replies on the Proposed Decision on Tracks I & III in R.10-05-006. Our filings, and participation in an All-Party Meeting with Commissioners Florio, Sandoval, and ALJ Allen, helped to fend off an attempt by several parties to spin the characterization of the Settlement that was presented in the Decision. We also helped to fend-off the efforts of some parties to loosen the Commission's oversight of the nascent market for greenhouse-gas allowances.	

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

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	Claimant	CPUC Verified
a. Was the Division of Ratepayer Advocates (DRA) a party to the proceeding?	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties: SDG&E, PG&E, SCE, DRA, TURN, UCS, NRDC, Greenlining Institute, IEP, L. Jan Reid, Communities for a Better Environment, Sierra Club, CEERT, Pacific Environment, Vote Solar Initiative, CalWEA.		
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:		

<p>This proceeding covered a wide variety of topics related to utility power procurement. The Green Power Institute has focused its participation on our primary area of interest, the renewable-energy sector and the role of renewables in long-term power procurement.</p> <p>The GPI coordinated its efforts in this proceeding with other parties in order to avoid duplication of effort, and added significantly to the outcome of the Commission's deliberations. In particular, we joined with UCS and NRDC in reviewing and commenting on the LTPP Staff Proposal during the summer of 2009, and we joined with the settling parties during the summer of 2011 in developing the Settlement agreement that was adopted in the Decision. Some amount of duplication has occurred in this proceeding on all sides of contentious issues, but Green Power avoided duplication to the extent possible, and tried to minimize it where it was unavoidable.</p>	
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C. Additional Comments on Part II (use line reference # or letter as appropriate):

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#	Claimant	CPUC	Comment

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

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

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<p>a. 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)</p> <p>The GPI is providing, in Attachment 2, a listing of all of the pleadings we provided in the two Proceedings covered by this Claim, R.08-02-007 and R.10-05-006, and a detailed breakdown of GPI staff time spent for work performed that was directly related to our substantial contributions to Decision D.12-04-046. Note that, per instructions of the ALJs and staff, a number of the pleadings were served to the service list but not filed at the docket office. These served-only pleadings, many of which were highly technical in nature, received the same level of diligence and attention on our part as pleadings that were formally filed.</p> <p>The hours claimed herein in support of Decision D.12-04-046 are reasonable given the scope of the Proceeding, and the strong participation by the GPI. Dr. Morris acted in this Proceeding as both witness and participating party. Attorney Tam Hunt provided legal and technical services during the Hearing Phase of the effort. We were also assisted by the efforts of three capable Associates, Logan Winston, Vennessia Whiddon, and Valerie Morris. GPI staff maintained detailed contemporaneous time records indicating the number of hours devoted to this case. In preparing Attachment 2, Dr. Morris reviewed all of the recorded hours devoted to this proceeding, and included only those that were reasonable and contributory to the underlying tasks. As a result, the GPI submits that all of the hours included in the attachment are reasonable, and should be compensated in full.</p>	<p>CPUC Verified</p>
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Dr. Morris is a renewable energy analyst and consultant with more than twenty-five years of diversified experience and accomplishments in the energy and environmental fields. He is a nationally recognized expert on biomass and renewable energy, climate change and greenhouse-gas emissions analysis, integrated resources planning, and analysis of the environmental impacts of electric power generation. Dr. Morris holds a BA in Natural Science from the University of Pennsylvania, an MSc in Biochemistry from the University of Toronto, and a PhD in Energy and Resources from the University of California, Berkeley.

Dr. Morris has been actively involved in electric utility restructuring in California throughout the past two decades. He served as editor and facilitator for the Renewables Working Group to the California Public Utilities Commission in 1996 during the original restructuring effort, consultant to the CEC Renewables Program Committee, consultant to the Governor's Office of Planning and Research on renewable energy policy during the energy crisis years, and has provided expert testimony in a variety of regulatory and legislative proceedings, as well as in civil litigation.

Mr. Hunt is a renewable energy law and policy expert with substantial experience in California, in local energy planning and in state energy-policy development. He has worked with local governments throughout Southern California, in his current role with Community Renewable Solutions LLC and in his previous role as Energy Program Director for the Community Environmental Council, a well-known non-profit organization based in Santa Barbara. Mr. Hunt was the lead author of the Community Environmental Council's A New Energy Direction, a blueprint for Santa Barbara County to wean itself from fossil fuels by 2030. Mr. Hunt also contributes substantially to state policy, in Sacramento at the Legislature and in San Francisco at the California Public Utilities Commission, in various proceedings related to renewable energy, energy efficiency, community-scale energy projects, and climate change policy. Mr. Hunt is also a Lecturer in Climate Change Law and Policy at UC Santa Barbara's Bren School of Environmental Science & Management (a graduate-level program). He received his law degree from the UCLA School of Law in 2001, where he was chief managing director of the Journal for International Law and Foreign Affairs. Mr. Hunt is a regular columnist at Renewable Energy World

Mr. Winston and Ms. Whiddon are highly capable professionals who are in the early stages of their careers. Mr. Winston has a Masters from the University of Michigan, and Ms. Whiddon has a Masters from Towson University. Both are working in the renewable energy field. Mr. Winston worked for Horizon Wind, a developer active in California, for 3 years, and is currently working for a solar developer. Ms. Whiddon worked for 5 years for Washington Counsel / Ernst and Young, a Washington, D.C. based consulting and lobbying firm. Ms. Morris was a student in environmental science at the Univ. of Rochester when she was an Associate with the GPI. She has now become an RN.

b. Reasonableness of Hours Claimed.

The GPI made Significant Contributions to Decision D.12-04-046 by providing a series of Commission filings on the various topics that were under consideration

<p>in the two Proceedings covered by this Claim, and by participating in working groups, workshops, settlement discussions, and Hearings. A good deal of the work that we did was highly technical in nature, including developing and applying sophisticated models to the various matters that were being studied during the four years covered by this Claim. Attachment 2 provides a detailed breakdown of the hours that were expended in making our Contributions. The hourly rates and costs claimed are reasonable and consistent with awards to other intervenors with comparable experience and expertise. The Commission should grant the GPI's claim in its entirety.</p>																			
<p>c. Allocation of Hours by Issue</p> <p>(organized by the categories used for documenting Substantial Contribution)</p> <table> <tr> <td>1. System need determination</td> <td>6%</td> </tr> <tr> <td>2. Environmental risk analysis</td> <td>11%</td> </tr> <tr> <td>3. 33% RPS implementation analysis</td> <td>17%</td> </tr> <tr> <td>4. Inputs, metrics, and scenarios</td> <td>6%</td> </tr> <tr> <td>5. LTPP work plan</td> <td>10%</td> </tr> <tr> <td>6. RPS planning standards</td> <td>11%</td> </tr> <tr> <td>7. RPS integration analysis</td> <td>10%</td> </tr> <tr> <td>8. Testimony, hearings, settlement, briefs</td> <td>26%</td> </tr> <tr> <td>9. Proposed Decision</td> <td>3%</td> </tr> </table>	1. System need determination	6%	2. Environmental risk analysis	11%	3. 33% RPS implementation analysis	17%	4. Inputs, metrics, and scenarios	6%	5. LTPP work plan	10%	6. RPS planning standards	11%	7. RPS integration analysis	10%	8. Testimony, hearings, settlement, briefs	26%	9. Proposed Decision	3%	
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7. RPS integration analysis	10%																		
8. Testimony, hearings, settlement, briefs	26%																		
9. Proposed Decision	3%																		

B. Specific Claim:

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CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
G. Morris	2008	206.5	\$230	D.11-07-025	\$ 47,495			
G. Morris	2009	182.0	\$240	D.11-07-025	\$ 43,680			
G. Morris	2010	140.5	\$240	D.11-07-025	\$ 33,720			
G. Morris	2011	229.0	\$240	D.11-07-025	\$ 54,960			
G. Morris	2012	23.5	\$240	draft Res.ALJ-281	\$ 5,640			
V. Morris	2009	52.5	\$ 33	D.11-09-013	\$ 1,733			
L. Winston	2010	12.5	\$ 70	D.11-09-013	\$ 875			
T. Hunt	2011	40.0	\$300	D.11-10-040	\$ 12,000			
V. Whiddon	2011	11.0	\$ 70	See comment #1	\$ 770			
V. Whiddon	2012	12.5	\$ 70	draft Res.ALJ-281	\$ 875			
Subtotal:					\$201,748	Subtotal:		
OTHER FEES								

Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
<i>Subtotal:</i>						<i>Subtotal:</i>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
G. Morris	2012	20	\$120	½ regular	\$ 2,400			
<i>Subtotal:</i>						<i>Subtotal:</i>		
COSTS								
#	Item	Detail			Amount	Amount		
	Postage	See Attachment 2			\$ 119			
<i>Subtotal:</i>					\$ 119	<i>Subtotal:</i>		
TOTAL REQUEST \$:					\$204,367	TOTAL AWARD \$:		
<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. **Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate.</p>								

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

Attachment or Comment #	Description/Comment
Comment #1	<p>Hourly Rate for Vennessia Whiddon in 2011:</p> <p>Vennessia Whiddon is a renewable energy regulatory consultant focused on advancing the development of small-scale and utility-scale renewable energy projects. She has a master's degree from Towson University, and more than five years of experience working for Washington Counsel/Ernst & Young, a Washington, DC, based consulting and lobbying organization, performing a variety of duties in the renewable energy regulatory area. The Commission has previously approved a rate of \$70 per hour for GPI Associate Logan Winston, who has an equivalent level of education and slightly less experience than Ms. Whiddon, and we ask for the same rate of \$70 per hour for Ms. Whiddon.</p>
Attachment #1	Certificate of Service
Attachment #2	List of Pleadings, Daily Time Records, Cost Details, Allocation of Time by Issue / Activity

D. CPUC Disallowances, Adjustments, and Comments (CPUC completes):

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#	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?	
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If so:

Party	Reason for Opposition	CPUC Disposition

B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(2)(6))?	
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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 requested hourly rates for Claimant’s representatives [,as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [,as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable 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. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay Claimant their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ 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 _____, 200__, the 75th 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 decision is effective today.

Dated _____, at San Francisco, California.