Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

1

Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans.	Rulemaking 10-05-006 (Filed May 6, 2010)

INTERVENOR COMPENSATION CLAIM OF WOMEN'S ENERGY MATTERS AND DECISION ON INTERVENOR COMPENSATION CLAIM OF WOMEN'S ENERGY MATTERS

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Claimant: Women's Energy Matters			**For contribution to D1201033 and D1204046 (R1005006) and R0802007 (closed without decision)**
Claimed ($): $81,745.00			**Awarded ($):**
Assigned Commissioner: Michael Peevey			**Assigned ALJ: Peter Allen, Victoria Kolakowski (R1005006); Carol Brown (R0802007)**
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is trueto 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:	**/s/Barbara George**
Date:	**6/25/12**	**Printed Name:**	**Barbara George**

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

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A. Brief Description of Decisions:	D1201033 was the decision in Track 2, the "IOUs bundled plans." D1204046 was the decision in Track 1, the "system plans."
	In this request, WEM also claims compensation for our work in the prior LTPP proceeding, R0802007, which ended without issuing any decision.[1] The Commission has

[1] The prehearing conference in R0802007 was held April 2, 2008; WEM timely filed its NOI on May 2, 2008. Decision 0801017 (January 10, 2008) in A0702032 et al. ruled that

	allowed parties to request compensation in subsequent proceedings for work that was unresolved in earlier dockets, especially when there wasn't any decision in the earlier docket.

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:	6/14/10	
2. Other Specified Date for NOI:		
3. Date NOI Filed:	7/14/10	
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:		
6. Date of ALJ ruling:		
7. Based on another CPUC determination (specify):	D1005049	
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:		
10. Date of ALJ ruling:		
11. Based on another CPUC determination (specify): D1	D1005049; D1202034	
12. 12. Has the Claimant demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
7 — 13. Identify Final Decision:	D1204046	
14. Date of Issuance of Final Order or Decision:	4/24/12	
15. File date of compensation request:	6/25/12[2]	
16. Was the request for compensation timely?		

WEM met the customer status and financial hardship requirements and was eligible for intervenor compensation (pp. 3-4).

[2] **Rule 1.15 Computation of Time states:** When a statute or Commission decision, rule, order, or ruling sets a time limit for performance of an act, the time is computed by excluding the first day (i.e., the day of the act or event from which the designated time begins to run) and including the last day. If the last day falls on a Saturday, Sunday, holiday or other day when the Commission officers are closed, the time limit is extended to include the first day thereafter.

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

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#	Claimant	CPUC	Comment
			D1201033 (Track 2) was silent as to inadvertent or planned nuclear shutdown and replacement, which was a considerable part of WEM's work in that track. We waited to file for compensation til the Track 1 decision, believing that it might be more likely to address the issue — based on the ALJ's statement in the 5-23-11 hearing that Track 1 would be a more appropriate place to address nuclear issues. 5-23-11 Transcript, pp. 36-37 (see further discussion of this hearing below). The final decision in Track 1 noted only, "Reid and Women's Energy Matters argue that the proposed decision should have addressed issues they raised relating to the continued use of nuclear power. While issues relating to the need for various generation resources are appropriate to address in an LTPP proceeding, those issues have been deferred as a result of the settlement, and accordingly it is reasonable to not address them in this decision." D1204046, pp. 68-69. Indeed, the successor LTPP, R1203014 is considering the issues of nuclear power shutdown and replacement resources. WEM's procedural accomplishments in the R1005006 proceeding were substantial, as our work established that nuclear issues are indeed relevant to the LTPP and are appropriate to be considered here. Although there was no final decision on nuclear power issues (other than PG&E's nuclear fuel contract), we believe that the Commission should award full compensation for WEM's work in this area. Alternatively, the Commission could consider compensation for our nuclear-related work in R1005006 after a decision on those matters in R1203014. However, the earliest decision in that case is expected in late 2012. Having to wait so long for compensation for work done in R1005006 would be contrary to the Intervenor Compensation statute, which requires CPUC to administer its provisions in a way that *encourages* parties' effective and efficient participation. PU Code §1801.3(b).
			The following is a list of WEM's filings in R1005006: **2010** 7-9-10 WEM Amended Reply LTPP EE.pdf **2011** 2-24-11 WEM Amended PHC statement.pdf (Note: the original PHC statement had two attachments, the ISO- New England Manual for Measurement of Demand Resources, and a 4-pg. extract from ISO-NE's power point report on its 2009 Forward Capacity Auction; per ALJ request we re-filed the PHC statement with links to these documents instead of attachments.) 5-11-11 WEM s Reply testimony.pdf 5-23-11 WEM Testimony Track 2 Alternative Bundled Procurement Plan-errata.pdf (original filing May 4, 2012) (with Attachment A – CA_Excess_Energy_Without_Nuclear.pdf)

			5-23-11 WEM Response to PG&E-SCE Motion to Strike.pdf 8-4-11 WEM Testimony Track I and III.pdf 9-16-11 WEM opening brief Track I & III.pdf 10-3-11 WEM Reply Brief Tracks I & III.pdf 12-5-11 WEM Reply re PD Track II.pdf **2012** 3-12-12 WEM Comment PD Track 1.pdf 3-19-12 WEM Reply Comments.pdf **The following is a list of WEM's filings in R0802007:** R0802007 WEM filings **2009** 8-21-09 WEM Comment LTPP Planning Standards.pdf (with Attachment A – New England ISO EE Manual.pdf) 8-31-09 WEM Reply LTPP Planning Standards.pdf

The following is a list of WEM's Exhibits in R1005006:

Party	Exhibit Number	Description	Document Date	Admission Date	Track
WEM	800	Women Energy Matters' Testimony: WEM's Alternative Bundled Procurement Plan for Bundled Track II (Errata dated 5/23/11; Attachment 1 dated 5/4/11)	5/23/11	5/23/11	II
WEM	801	Women Energy Matters' Reply Testimony	5/11/11	5/23/11	II
WEM	802	Women Energy Matters' Opening Testimony in Track 1 and III	8/4/11	8/17/11	I, III
WEM	803	WEM's 7-6-11 Comments to CEC on the DG	8/15/11	WEM requested to have this exhibit marked on 8/15/11 via email service to service list but this exhibit was	I

		Workshop [quoting PG&E's 11 General Rate Case testimony regarding customer-side solar and energy efficiency]		not moved to the record.	
WEM	804	PG&E's responses to five WEM data requests in this proceeding	8/15/11	8/17/11	I
WEM	805	CAISO's Responses to WEM's Data Requests	8/16/11	8/17/11	I
WEM	806	ISO New England Manual for Measurement and Verification of Demand Reduction Value from Demand Resources Manual M-MVDR	8/16/11	8/17/11	I
WEM	807	IOUs 2010-12 Proposed Program Budgets for Energy Efficency, from Appendix 1-2-3 to D0909047, pp. 1-9. (in A0807021)	8/16/11	WEM requested to have this exhibit marked on 8/16/11 via email service to service list but this exhibit was not moved to the record.	I
WEM	808	SCE's response to WEM's Data Request Q-3	8/16/11	WEM requested to have this exhibit marked on 8/16/11 via email service to service list but did not request to have this exhibit moved to the record.	I

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.)**

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Contribution	Specific References to Claimant's Presentations and to Decision	Showing Accepted by CPUC
Note: Generally, in this section, we first address WEM's contributions to D1201033, the Track 2 decision on bundled procurement plans, then our contributions to D1204046, and finally our earlier contribution in the prior LTPP, R0802007.		
WEM submitted an Alternative Bundled Procurement Plan to provide a more cohesive vision of how procurement issues could be addressed in ways that better fulfill CA's clean resource goals.	The ALJ ruled 2-10-12 that parties could propose an alternative bundled resource plan and/or comment on the utilities' bundled procurement plans. D1201033 stated, "The changes to the utilities' procurement authority that are made in this decision are largely technical revisions … and clarifications based on past experience and issues raised by the parties." D1201033, p. 4. While WEM is not specifically mentioned as one of "the parties," we clearly raised issues that contributed to the decision, as we describe below in this Request. *The Commission has found:* PG&E argues that WEM did not make a substantial contribution to D.07-12-052 and asserts the following: 1) The fact that WEM is only referred to once in D.07-12-052 shows that WEM did not make a substantial contribution to the proceeding; 2) The testimony WEM submitted consisted of unsupported and speculative statements that was neither cited nor referred to in D.07-12-052… 3) WEM often focused on issues that were outside the scope of the hearing… The flaw we find in PG&E's argument is three-fold. First, PG&E parses and	

	selectively reviews WEM's participation. Second, the fact that WEM is not specifically credited with making a substantial contribution on a particular issue does not mean that a substantial contribution was not made. Where a decision states a position that is consistent with that asserted by a party we may infer that the party made a contribution on that issue. D0904043, pp. 6-7 (emphasis added).	
The intervenor compensation statute, PU Code 1802(i) states in part: "Substantial contribution" means that, in the judgment of the commission, the customer's presentation has substantially assisted the commission in the making of its order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer." WEM made a major procedural contribution by arguing for the Commission to consider nuclear power in the context of the LTPP, which was accepted. WEM 5-23-11 Reply to Utilities' Motions to Strike (all), and B. George oral argument in 5-23-11 Hearing. While the ALJ suggested that the issue might be more pertinent to Track 1 than Track 2, we argued for addressing nuclear issues as soon as possible. "I'm basically saying we have here. We could take a terrible steel in the ground taking [use know, because of malfunction [which are about to [some, you know, earthquake catastrophe. So I'm not [eces saying that...the commission [take these resources [time, [tho would certainly recommend that. [W]hat we are proposing [had a plan for what [do	At the May 23, 2011 hearing, ALJ Allen ruled that the issue of nuclear power was xxxin-scope/relevant to procurement and that xxxhe would hear/parties could submit arguments in this proceeding. The ALJ first stated: "I may want to hear a little more on this, because, Ms. George, a couple of things. One of them is this track, Track II, as I indicated, was this is a relatively short-term look and is designed not to result in new steel in the ground. Which by the same token I think would tend to mean we are not taking major chunks of steel out of the ground. Now, the question of more steel in the ground and more steel out of the ground I think could be a more relevant issue for Track I… If your testimony is designed as basically providing kind of a general policy guidance for the Commission in this proceeding as we move forward, these are overarching principles to keep in mind, then I would be inclined to leave your testimony in place. " 5-23-11 Hearing Transcript, pp. 35-36. At the hearing the ALJ denied utilities' Motion to Stroke, meaning that WEM's Track 2 testimony on nuclear issues was indeed admissible: "I think what I'm going to do based on what I've heard and my reading is I'm going to deny PG&E's motion to strike the testimony of Women's Energy Matters." Ibid, p. 41.	

resources were not on the books themselves on line, or if the Commission decided was prudent to take the step, decided to protect its shareholders saving them the embarrassment problem if, you know, a catastrophe hadn't been planned for, then we'd be able to take that step; but if you made any kind of plans, we'll 23 11 Hearing Transcript, 40 [illegible] Throughout our testimony, briefs and hearings, WEM discussed the need to create a plan for clean replacement resources for nuclear power, because they could shut down at any moment — either in an unexpected outage or in the event that the state decided they were not needed because of reliability and/or cost concerns. We pointed out that the sudden loss of such large units could create emergency reliability problems, especially if a nuclear outage persisted through hot summer months without sufficient advance planning. We also discussed the high costs of dealing with this problem in an emergency, and the potential for catastrophic reliability problems and costs if a nuclear disaster occurred because of earthquakes, tsunamis, equipment failures or human errors. E.g. WEM 5-23-11 Testimony Track 1, pp. 8-10, WEM 8-4-11 Testimony Track 1, pp. 24-30, WEM 10-3-11 Reply Brief Track 1, pp. 16-22. As news dribbled out about the ongoing Fukushima disaster, WEM provided updates on the negative impacts on Japan's electricity reliability and costs, and overall economic woes resulting from the Fukushima disaster —pointing out that CA could experience similar problems if CA nuclear reactors became similarly disabled. We analyzed why utilities assume that replacement of nuclear power will be so expensive and time consuming: pursuant to NRC guidelines, they assume they must	The Track 2 decision was silent on the nuclear issues raised by WEM; the Track 1 decision mentioned that these issues were left unresolved because of the settlement, and would be deferred to the next LTPP proceeding (see section marked with red 8, above). Subsequently The OIR for the successor LTPP proceeding, R1203014, recognized the need to consider nuclear shutdown and replacement issues, and also stated that the record in R1005006 would be incorporated into the new proceeding.	

use a single resource as an alternative to nuclear power, which pushes them towards natural gas or coal, rejecting all clean resources. WEM Reply to PD Track 1, p. xxx		
WEM recommended adoption of the standardized planning assumptions. We discussed the large glut of power in California currently, which will persist through 2020. 5/23/11 Track 2 Testimony, p. 5. We also created the "Excess Energy with Nuclear Power" chart based on the CPUC's assumptions attached to the 2-10-11 Ruling, which we submitted as an attachment with WEM's 5-23-11 Testimony. Our chart graphically illustrated the energy glut in California, demonstrating that the state would still have 46% more power than it needs in 2021, even if both CA nuclear power plants were retired. WEM's work on development of planning assumptions, particularly with regard to EE, began in R0802007 and continued in R1005006. For example, WEM 7-9-10 Reply (amended). (Also see last item, below, re R0802007)	The Track 2 decision endorsed the Planning assumptions as follows: "Accordingly, the record in this proceeding relies heavily upon the standardized planning assumptions that the utilities were required to use in preparing their proposed procurement plans… While we should not force utility procurement to precisely conform to the standardized planning assumptions, the utilities cannot just disregard the standardized planning assumptions and procure whatever they want." D1201033 pp. 6-7.	
Throughout both tracks of R1005006 and the prior LTPP R0802007, WEM discussed the Loading Order at length and recommended specific ways to cut through barriers to the use of all grid-reliable resources in procurement. We focused particularly on ensuring that the Loading Order applies in an ongoing way to EE, DG and small renewables, contrary to utilities' assumptions that after they meet their preferred resource targets set in other proceedings, from then on they can procure conventional resources. See, e.g. WEM Testimony Track 2, pp. 16-21, 6-20-11 WEM Track 2 Opening Brief, p. 4-20, 6-30-11 WEM Track 2 Reply Brief, p. 10. We noted the utilities' opposition to the loading order in hearings, e.g. WEM	D1201033 ordered utilities to follow the Loading Order, clarified that it is "ongoing" and discussed at length how to apply the loading order including with regards to EE. D1201033, pp. 16-22. "Given the differing interpretations of the loading order offered in this proceeding, it is important that we clarify the correct implementation of the loading order… Accordingly, to clarify the Commission's position, we expressly endorse the general concept that the utility obligation to follow the loading order is ongoing. The loading order applies to all utility procurement, even if pre-set targets for certain preferred resources have been achieved." D1201033, p. 20. COL 7 and OP5 made similar	

Opening Brief, Track 1, p. 18.	statements. The Track 1 decision reiterated the previous decision's commitment to the loading order, p. 43.	
WEM discussed the fact that the CPUC's independent EM&V reports on 2006-08 stated that EE results fell far short of the goals, differing significantly from the energy efficiency accomplishments claimed by utilities, which formed the basis of a bitterly contested 5-3 EE decision (D1012049). We cited Grueneich's dissent to IOU EE exaggerations in p. 18, fn. 12. In many filings in this case, we warned that there is a lack of enforcement and accountability for EE results, which could result in procurement shortfalls. We pointed out that utilities resist orders in the EE proceedings to make up shortfalls. E.g. WEM Opening Testimony in Track 2, pp. 19-20. On the other hand, WEM noted the potential for EE savings to be much larger than current goals, and contribute much more to procurement. We provided a chart showing that independent, non-utility EE program providers in Texas achieve 4.5 x the savings per dollar as California. WEM 5-11-11 Reply Testimony Track 2, p. 5. Thus, WEM demonstrated that IOUs could in fact make up past shortfalls. We discussed procurement-related EE issues further in our Oct. 3, 2011 Reply Brief, including a detailed analysis of the Incremental EE Report. pp. 1-16. It is clear that WEM made significant contributions to these proceedings with regards to EE.	The Track 2 decision recognized the potential for utilities to miss their goals, urged them not to pretend to have met them, and took the additional step of requiring them to make up shortfalls under certain circumstances. The decision's language echoed WEM's concerns and recommendations: "Our priority here is ensuring that there is adequate overall procurement within the requirements of section 454.5. For example, if the Commission, in an energy efficiency proceeding, ordered the utilities to obtain 1000 units of energy efficiency, that order is still in effect, and the utilities still need to comply with that order. But if for some reason the utilities only obtained 900 units of energy efficiency, the utilities do not need to pretend that they actually got 1000 and refrain from procurement to make up the shortfall. For procurement purposes, the utilities need to make up the shortfall. The utilities may have to explain to the Commission elsewhere why they failed to comply with the energy efficiency requirement, but if the procurement needed to make up the shortfall is within the parameters specified in this decision, for procurement purposes the utilities do not need to seek Commission approval for the variation." D1201033, p. 22. While WEM is not specifically mentioned, it is clear that WEM contributed substantially to the Commission's thinking on this issue.	
WEM provided the Commission with alternative methodology such as ISO-New England's Manual for Measurement of Demand Side Resources, the use of which would ensure more robust, grid-reliable EE	At the 5-23-11 Hearing, PG&E specifically asked the Judge to strike the portions of WEM's testimony pertaining to energy efficiency and the interconnection problems of small renewables (Rule 21). The judge denied PG&E's request. 5-23-11	

alternatives to current EE programs, as well as DG. Links to ISO-NE resources, including its Manual and Forward Capacity Auction were included in WEM's 2-24-11 Amended PHC Statement, p. 3, as well as 5-23-11 WEM Testimony Track 1, pp. 18-19. WEM's Testimony also described the interconnection problems of small renewables (Rule 21). Ibid, pp. 13-14.	Transcript, p. 41.	
WEM's participation in R0802007 raised issues of the loading order in procurement, particularly Energy Efficiency. For example, this is the first LTPP where we submitted the ISO-New England Manual for Measurement of Demand Resources in capacity markets. WEM Comment LTPP Planning Standards, 8-21-09.	The R0802007 proceeding mainly addressed Standardized Planning Assumptions. This work was further developed in R1005006.	

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: Pacific Environment, Sierra Club, CBE, TURN, Green Power Institute, Jan Reid.		
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: WEM has pioneered the effort to ensure that procurement follows the loading order, through three procurement dockets; our work (particularly on energy efficiency) has informed most of the other parties who are now joining us to address this issue in the		

LTPP. Each of us has different types of expertise that we bring to bear in different ways. While DRA and other parties in this proceeding limited their work to analyzing the utilities' plans, WEM also provided a comprehensive vision of practical alternatives in our Alternate Procurement Plan. WEM's energy efficiency analysis was unique in several ways, for example that it offered a detailed, insider's view of the inputs to the uncommitted energy efficiency report, which add to its uncertainty, and the utilities' failure to meet their targets according to the CPUC staff and consultants evaluation, measurement & verification reports (EM&V). WEM also provided perspectives on how other states are fully incorporating EE, DR and DG resources into procurement. We analyzed what needs to change in the measurement of EM&V and accountability of EE providers to meet their targets, in order for EE to be grid-reliable. WEM discussed our approach to the nuclear issues with Jan Reid. While Reid proposed a new proceeding to discuss all nuclear issues, WEM recommended the LTPP proceeding as the appropriate place to consider replacement resources for nuclear power, as well as the inadvertent or planned shutdown of nuclear power plants.	

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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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)	**CPUC Verified**
WEM introduced cost-effective alternatives to current procurement planning, including "systems thinking" and better ways to incorporate "loading order" resources (Demand Side and Distributed Generation technologies) — which have proved effective in other states or countries or CA publicly owned utilities like SMUD — all of which result in lower energy costs and rates than CA IOUs. WEM also established that the potential shutdown and replacement of nuclear power is appropriate to address in the LTPP. Both Track 1 and 2 decisions clarified the loading order and ordered utilities to embrace it in "ongoing" procurement. While the future savings that this is likely to produce are in the billions of dollars, it is not possible to exactly quantify the amounts, given the varying	

effectiveness with which utilities may implement the Commission's orders and actually realize these savings. Many questions of rules, methodology, renewables "integration," local capacity and replacement of specific resources, including nuclear power, were kicked forward into the next LTPP.	
b. Reasonableness of Hours Claimed. WEM's claim is very reasonable. The Commission had the benefit of our deep knowledge of energy efficiency issues from a decade of involvement in CPUC EE proceedings as well as our familiarity with best practices from around the nation for utilizing EE in procurement; our nuclear expertise draws on 30 years experience with this issue and close involvement with international efforts to learn from the Fukushima nuclear disaster.	
c. Allocation of Hours by Issue Issues 10% Unreliability and costs of nuclear power given what we are learning from Fukushima 10% Alternative procurement plan (methodology for planning and utilizing clean alternatives to replace nuclear power and OTC gas resources according to the Loading Order) 3% Short-term clean resource planning (e.g. for potential sudden loss of nuclear power) 10% IOUs bundled program plans 10% System planning 1% Relationship of utility procurement to CCAs and DAs 8% Local capacity area planning 8% Loading Order 3% IOUs procurement methodology as a barrier to the Loading order 5% Standardized Planning Assumptions – overall issues 5% Uncertainty of ""uncommitted incremental energy efficiency" assumptions (current EE programs) 4% Difficulties of planning with EE and local solar resources "embedded" in demand forecasts 8% Use of energy efficiency as capacity, as ISO-New England is doing 4% Participation of demand resources in RFOs 2% Renewables integration 3% Interconnection of small renewables 1% Use of EE for GHG reductions 5% General Participation (not associated with particular issue)	

B. Specific Claim:

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate	Basis for Rate*	Total $	Hours	Rate	Total $

Barbara George R0802007	2008	7.25	170	D1009039	$1,232.50
Barbara George R0802007	2009	21	179	D1009039	$3,570.00
Barbara George R1005006	2010	20	$175	D1202034	$3,500.00
Barbara George R1005006	2011	370.5	$175	D1202034	$64,837.5
Barbara GeorgeR1005006	2012	35.5	180	request increase based on added years of experience	$6,390.00
				Subtotal:	$79,530.0

	Barbara George R0802007	2008	7.25	170	D1009039	$1,232.50			
	Barbara George R0802007	2009	21	179	D1009039	$3,570.00			
	Barbara George R1005006	2010	20	$175	D1202034	$3,500.00			
	Barbara George R1005006	2011	370.5	$175	D1202034	$64,837.5			
	Barbara George R1005006	2012	35.5	180	request increase based on added years of experience	$6,390.00			
					Subtotal:	79,530.00		***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 $**
15	[Person 1]			$					
	[Person 2]								
					Subtotal:			***Subtotal:***	
	INTERVENOR COMPENSATION CLAIM PREPARATION **								
	Item	**Year**	**Hours**	**Rate**	**Basis for Rate***	**Total $**	**Hours**	**Rate**	**Total $**
16	Barbara George R0802007	2008	5.75	85	D1009039	488.75			
	Barbara George R1005006	2010	2.5	87.50	D1202034	$218.75			
	Barbara George R1005006	2012	16.75	87.50	D1202034	$1,507.50			

		Subtotal:	$2,215.00	*Subtotal:*	
COSTS					
#	**Item**	**Detail**	**Amount**	**Amount**	
		Subtotal:		*Subtotal:*	
		TOTAL REQUEST $:	**81,745.00**	**TOTAL AWARD $:**	

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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.

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

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Attachment or Comment #	Description/Comment
1	**Certificate of Service**

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?	

If so:

Party	Reason for Opposition	CPUC Disposition

B. Comment Period: Was the 30-day comment period waived (*see* Rule 14.6(2)(6))?	

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.