

Decision _____


BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Continue Implementation and Administration of California Renewables Portfolio Standard Program.	Rulemaking 11-05-005 (Filed May 5, 2011)
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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.11-12-020, D.11-12-052, D.12-05-035, and D.12-06-038
Claimed (\$): 92,419	Awarded (\$):
Assigned Commissioner: Pres. Peevey	Assigned ALJs: Anne Simon, Regina DeAngelis
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: 8/23/12	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:	Decisions D.11-12-020, D.11-12-052, and D.12-06-038 are all parts of the process of implementing the state's new RPS law, SB 2 [1X]. D.11-12-020 ... remember 035 SB32
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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:	June 13, 2011	
	2. Other Specified Date for NOI:		
	3. Date NOI Filed:	July 11, 2011	
	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.11-03-012	
	6. Date of ALJ ruling:	Dec. 1, 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.11-03-012	
	10. Date of ALJ ruling:	Dec. 1, 2011	
	11. Based on another CPUC determination (specify):		
12.	12. Has the Claimant demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):			
7	13. Identify Final Decision:	D.12-06-038	
	14. Date of Issuance of Final Order or Decision:	June 27, 2012	
	15. File date of compensation request:	August 23, 2012	
	16. Was the request for compensation timely?		

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

#	Claimant	CPUC	Comment
8			

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
D.11-12-020, Procurement Quantity Requirements	(Please note that Attachment 2 includes a list of all GPI Pleadings relevant to this Claim.)	
<p>Start SB 2 [1X] Program on Jan. 1, 2011</p> <p>The initial threshold issue that had to be decided in implementing the new RPS legislation was on what date should be the new program commence? The legislation said Jan. 1, 2011, but the law did not go into effect until December of 2011.</p> <p>The GPI was an advocate for using the statutorily-mandated start date of Jan. 1, 2011, for the new 33% RPS program, rather than using the date that the legislation became effective. We also pointed out that the 2011 procurement target would be 20% either way.</p>	<p>GPI’s <i>Comments on Content Categories</i>, 8/8/11, pg. 4.</p> <p>GPI’s <i>Comments on Targets and Compliance</i>, 8/30/11, pgs. 1 & 8.</p> <p>GPI’s <i>Comments on the Proposed Decision</i>, 11/17/11, pg. 1.</p> <p>The Decision adopts the GPI’s recommendation of a Jan. 1, 2011 start date, concluding: “Even if the effective date of the law is after the opening date of the compliance period, setting the compliance period in this way is within the authority of the legislature (D.11-12-020, pg. 10).”</p>	
<p>Set Linear Targets for Unspecified Years</p> <p>SB 2 [1X] sets numerical targets for five years of the ten-year period covered by the legislation (2011 – 2020), and leaves it to the Commission to set targets for the other five years, consistent with ensuring that retail sellers make reasonable progress towards the ultimate goal of 33% renewables by 2020.</p> <p>The GPI was a strong advocate for using a linear projection for the unspecified years, including pointing out that although the staff proposal argues in favor of the linear projection, it failed to implement it correctly for the 2014 – 2016 compliance period.</p>	<p>GPI’s <i>Comments on Targets and Compliance</i>, 8/30/11, pg. 2.</p> <p>GPI’s <i>Reply Comments on Targets and Compliance</i>, 9/12/11, pg. 4.</p> <p>GPI’s <i>Comments on the Proposed Decision</i>, 11/17/11, pg. 1.</p> <p>GPI’s <i>Reply Comments on the Proposed Decision</i>, 11/22/11, pgs 1 – 2.</p> <p>The Decision adopts the GPI’s recommendation for using a linear projection for procurement targets for unspecified years, including correcting the numbers in the PD (D.11-12-020, pgs. 12 – 15, esp. last full paragraph on pg. 14).</p>	

<p>Enforce on a Compliance-Period Basis, Requirement = Sum over Years of Compliance Period the Quantity, Target x Sales</p> <p>SB 2 [1X] creates three multiyear compliance periods to span the ten years until the annual mandate of 33% renewables is to be achieved and maintained. The legislation left most of the implementation details to the Commission.</p> <p>The GPI advocated for enforcement on a compliance-period basis only, with the compliance period obligation calculated as the sum of the annual sales multiplied by the annual procurement target for each year of the compliance period.</p>	<p>GPI's <i>Comments on Targets and Compliance</i>, 8/30/11, pgs. 2, 3, 7.</p> <p>GPI's <i>Comments on the Proposed Decision</i>, 11/17/11, pgs. 1 – 2.</p> <p>The Decision adopts the GPI's recommendations for enforcing the new RPS program on the basis of the three statutorily-defined, multiyear-compliance periods, and uses the GPI's formula for calculating the compliance obligation for each compliance period (D.11-12-020, pgs. 7 – 12, 18).</p>	
<p>Use Public Process to Create New Reporting Template</p> <p>The PD on Procurement Quantity Requirements directed the energy division to develop a reporting template incorporating the specifications and needs of the new RPS program.</p> <p>The GPI advocated for the use of a public process in the development of the reporting template, and argued for simplification compared to the spreadsheet that was used in the first phase (2003 – 2010) of the RPS program.</p>	<p>GPI's <i>Comments on the Proposed Decision</i>, 11/17/11, pg. 2.</p> <p>GPI's <i>Reply Comments on the Proposed Decision</i>, 11/22/11, pg 3.</p> <p>The final text of the Decision adopts our recommendation, directing the Energy Division staff to develop the new reporting template “in consultation with the parties.” (D.11-12-020, pg. 19.)</p>	
<p>D.11-12-052, Portfolio Content Categories</p>		
<p>Existing Contracts not Altered</p> <p>SB 2 [1X] eliminates the Delivery Requirement for renewable energy imported into California that was a part of the state's RPS program from 2003 – 2011. PPAs that were signed when the requirement was in statute often included language referring to Delivery. The question was: how did the elimination of the statutory</p>	<p>GPI's <i>Comments on Content Categories</i>, 8/8/11, pg. 3.</p> <p>The Decision adopts our approach, noting: “Other parties [GPI noted in footnote] assert that contracts approved by the Commission prior to December 10, 2011 should not be affected. The Decision concludes: “The</p>	

<p>language on Delivery pertain to existing contracts?</p> <p>The GPI argued that “on the date that the new legislation becomes effective, all Delivery requirements be removed.”</p>	<p>statutory change, without more, does not alter a contract approved by the Commission.” (Both quotes from D.11-12-052, pg. 16).</p>	
<p>Procurement Transaction Determines Product Category</p> <p>SB 2 [1X] creates three RPS procurement categories, which apply to “eligible renewable energy resource electricity products.” The challenge was to interpret this phrase.</p> <p>The GPI argued that the phrase above “means any electrical product produced by a California-eligible generator and sold (and sometimes resold) in the marketplace”</p>	<p>GPI’s <i>Comments on Content Categories</i>, 8/8/11, pg. 1.</p> <p>The Decision acknowledges our contribution in footnote 30 (pg. 17), and adopts our approach, noting “The ‘product’ is simply ‘that which meets the criteria for this category or subcategory.’” (D.11-12-052, pg. 18.)</p>	
<p>Unbundled RECs can be Category 1</p> <p>The previous version of the RPS program differentiated between bundled and unbundled RECs with respect to compliance requirements. SB 2 [1X] sets criteria for the new product categories that are not based on the old distinction of bundled vs. unbundled. This led to ambiguity for how to classify RECs generated in-state, but for electricity used behind the meter.</p> <p>The GPI argued that the old distinction between bundled and unbundled were no longer in effect, and that the new statute specifically allowed for behind-the-meter, in-state RECs to be classified as category 1.</p>	<p>GPI’s <i>Comments on Content Categories</i>, 8/8/11, pg. 2.</p> <p>GPI’s <i>Reply Comments on the PD</i>, 11/1/11, page 1.</p> <p>The Decision does not adopt our interpretation, instead classifying behind-the-meter, in-state RECs as category 3. Commission President Peevey, in his oral remarks on the Decision, lamented this part of the Decision, and declared that he would file a Concurrence. While our recommendation on this matter was not adopted, we made a substantial contribution by ensuring that a proper and convincing case for category 1 was in the record that was the basis for the Decision.</p>	
<p>Scheduled without Substitution</p> <p>The statutory criteria for category 1 qualification state, among other things, that import energy must be scheduled into a CA balancing authority “without substituting electricity from another source.” This phrase</p>	<p>GPI’s <i>Comments on Content Categories</i>, 8/8/11, pgs. 1 – 2.</p> <p>The Decision acknowledges, on page 22, our insight regarding the stringency of the new requirement, and agrees with our analysis that only energy that originates with the qualified</p>	

<p>had to be interpreted in order to be implemented.</p> <p>The GPI pointed out the this qualification was more stringent than the old program's delivery requirement, and limited category 1 qualification to out-of-state energy that is scheduled into CA on a single e-tag, which is only a percentage of the energy that is delivered under typical firm and shaped contracts.</p>	<p>generator, and is scheduled straight through to a CA balancing authority, is eligible under category 1. (See D.11-12-052, pgs. 22 – 27.)</p>	
<p>Upfront Showing for Category 3 Energy</p> <p>Because SB 2 [1X] employs criteria that are absent in the previous version of the RPS program, the Commission will require new information from retail sellers regarding their procurement transactions.</p> <p>The GPI pointed out that RPS energy in category 3 is the least desirable kind of RPS energy, and that the least that the Commission could do for this category is to limit the upfront showing requirement to the bare minimum necessary.</p>	<p>GPI's <i>Comments on the PD</i>, 10/27/11, pgs. 1 – 2.</p> <p>In response to our <i>Comments</i> the requirements for an upfront showing for category 3 energy were reduced and simplified from the text in the PD to the text in the final Decision (see D.11-12-052 pgs. 56 – 57).</p>	
<p>D.12-05-035, Revising Feed-In Tariff Program</p>		
<p>Technology-Specific Pricing and setaside</p> <p>SB 32 bestows wide latitude for the Commission to use in setting pricing terms for the FIT program. The GPI has been a long-time and consistent proponent of the use of technology-based pricing, including cost-based pricing, and of establishing technology setasides for purposes of rewarding special benefits associated with certain kinds of generating resources, and resource diversity.</p>	<p>GPI/Sustainable Conservation <i>Comments on the §399.20 Ruling</i>, 7/21/11, pgs. 2 – 10 generally, and particularly pgs. 6-8.</p> <p>GPI/Sustainable Conservation <i>Comments on the Revised Staff FIT Proposal</i>, 11/2/11, pgs. 6 – 11.</p> <p>GPI/Sustainable Conservation <i>Reply Comments on the Revised Staff FIT Proposal</i>, 11/14/11, pgs. 3 – 5.</p> <p>Although not adopting our proposal directly, the Decision acknowledges our contribution, and adopts elements of our proposal in differentiating the FIT price into three product categories, including baseload (see D.12-05-035</p>	

	pgs. 80 – 82), and with separate pricing for each category (see D.12-05-035 pgs. 24 – 27).	
<p>Increase Project Size to 3 MW</p> <p>SB 32 deals explicitly with renewables projects up to 3 MW in size. However, the Commission had yet to increase the FIT size limitation of 1.5 MW left over from AB 1969. The question was posed as to whether to extend the FIT program to projects of 3 MW. The GPI has long been an advocate of increasing the size limit of the FIT program, and advocated for it in this track of the present proceeding.</p>	<p>GPI/Sustainable Conservation <i>Comments on the §399.20 Ruling</i>, 7/21/11, pgs. 11 – 12.</p> <p>The Decision acknowledges our contribution on page 63, and adopts our recommendation to extend the program to generators up to 3 MW in size (see D.12-05-035 pgs. 62 – 66).</p>	
<p>Ten-Day Reporting Requirement</p> <p>SB 32 amends §399.20 by requiring a 10-day reporting period for applications to the FIT program. The GPI argued in favor of increased transparency in the program, and sought guidance with respect to when the 10-day reporting period commenced.</p>	<p>GPI/Sustainable Conservation <i>Comments on the §399.20 Ruling</i>, 7/21/11, pgs. 13 – 14.</p> <p>The Decision acknowledges our contribution on page 89, and adopts the 10-day reporting requirement (see D.12-05-035 pgs. 88 – 92).</p>	
<p>Joint Parties' Motion</p> <p>GPI joined with a broad coalition of parties in crafting a Motion seeking further consideration of administratively-set FIT prices. We contended that the staff proposal unduly restricted the context of the debate, and that alternative pricing proposals deserved further consideration.</p>	<p>CEERT, GPI, et al, <i>Joint Motion for a Ruling Directing the Consideration of an Administratively-Determined AC Methodology</i>, 12/19/11, entire document.</p> <p>Although not adopted, the Decision acknowledges our contribution in producing a full record on page 104 (see D.12-05-035 pgs. 104 – 105).</p>	
D.12-06-038, RPS Compliance Rules		
<p>Transition from Phase 1 to Phase 3 of the California RPS Program</p> <p>SB 2 [1X] makes major changes to the state's RPS statutes, but the legislation says very little</p>	<p>GPI's <i>Comments on Targets and Compliance</i>, 8/30/11, pgs. 3 – 4.</p> <p>GPI's <i>Reply Comments on Targets and Compliance</i>, 9/12/11, pgs. 1, 3 – 4.</p>	

<p>about how to transition from the previous phase of the RPS program to the new phase of the program. This left the Commission with the job of determining how to close-out the previous phase of the program and make any necessary adjustments in transition, as well as creating new rules for the new phase of the program.</p> <p>The GPI made a series of substantial contributions concerning the transition from phase 1 to phase 2 of the state’s RPS program. Some of our recommendations were adopted in the Decision while others were not, but in all cases we believe that we made a strong and reasoned case for our position, so that the record upon which the Commission made its determinations was thereby enriched.</p> <p>The major positions that we took on the transition from phase 1 to phase 3 of the RPS program included:</p> <ul style="list-style-type: none"> • SB 2 [1X] does not negate the first phase of the program (2003 – 2010) • Phase 1 program obligations should be fulfilled • New sections 399.15(a) & 399.15(b)(9) are not in conflict • Old contracts are not subject to product categories • The safe harbor is a limited provision • The methodology in the PD for calculating prior deficits is sound 	<p>GPI’s <i>Reply Comments on the PD</i>, 11/1/11, page 2.</p> <p>GPI’s <i>Supplemental Comments on Reporting and Compliance</i>, 2/13/12, pg. 4.</p> <p>GPI’s <i>Supplemental Reply Comments on Reporting and Compliance</i>, 2/21/12, pg. 3.</p> <p>GPI’s <i>Comments on the PD of ALJ Simon</i>, 5/14/12, pgs. 3 – 6, 7 – 10.</p> <p>GPI’s <i>Reply Comments on the PD of ALJ Simon</i>, 5/21/12, pgs. 1 – 2.</p> <p>The Decision acknowledges our Contribution in determining that §§s 399.15(a) & 399.15(b)(9) are not in conflict (see D.12-06-038 pg. 11). Footnote 31 on pg. 17 of the Decision acknowledges our Contribution to confirming that the proposed method for determining prior deficits was consistent with old program rules (see D.12-06-038 pgs. 15 – 21). The Decision adopts most of our proposal for how to satisfy prior deficits (see D.12-06-038 pgs. 25 – 28). The Decision confirms our interpretation of §399.16(d) (see D.12-06-038 pg. 30).</p>	
<p>Dimensions of Compliance</p> <p>SB 2 [1X] sets overall program goals for the RPS program, culminating in the state reaching and maintaining a minimum 33% renewables content in the state’s electricity supply by 2020. The legislation also creates three product categories for qualified RPS energy, and sets parameters for their contributions to a retail seller’s procurement obligation. This led to a discussion as to whether compliance could be achieved on the basis of meeting the overall</p>	<p>GPI’s <i>Supplemental Comments on Reporting and Compliance</i>, 2/13/12, pg. 4.</p> <p>GPI’s <i>Supplemental Reply Comments on Reporting and Compliance</i>, 2/21/12, pgs. 2 – 3.</p> <p>Although the Decision defers a determination on enforcement actions for later in this Proceeding, it acknowledges our Contribution with several citations in discussing the issue as it stands at this point in time, and adopts our recommendation that some form of enforcement</p>	

<p>compliance-period targets alone, or whether compliance also required conformance with the product-category specifications.</p> <p>The GPI argued that full program compliance requires conformance with all of the statutory requirements, but that enforcement of the product-category requirements could certainly be different, probably less severe, than enforcement of the overall program targets.</p>	<p>must be applied for failure to reach content-category requirements in order to make these requirements meaningful (see D.12-06-038 pgs. 55 - 60).</p>	
<p>Annual Reporting</p> <p>SB 2 [1X] changes the RPS reporting requirements for retail sellers. In the new phase of the program, reporting is to be done on an annual basis, rather than the previous biannual reporting on procurement plus an annual project development status report.</p> <p>The GPI argued in favor of simplified and timely annual filing, and that what was previously a separate filing, the annual project development status report, should be included in the new annual compliance report.</p>	<p>GPI’s <i>Supplemental Comments on Reporting and Compliance</i>, 2/13/12, pgs. 1 – 3.</p> <p>GPI’s <i>Supplemental Reply Comments on Reporting and Compliance</i>, 2/21/12, pgs. 1 – 2.</p> <p>GPI’s <i>Reply Comments on the PD of ALJ Simon</i>, 5/21/12, pg. 3.</p> <p>The Decision acknowledges our Contribution in pushing for simplified reporting on page 76, and concludes: “The Commission concurs that simplicity in reporting is a desirable goal (pg. 77).” The Decision adopts our recommendation to include the project development status report in the annual compliance reports on page 78. (see D.12-06-038 pgs. 75 – 78.)</p>	

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

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	Claimant	CPUC Verified
<p>a. Was the Division of Ratepayer Advocates (DRA) a party to the proceeding?</p>	Yes	
<p>b. Were there other parties to the proceeding with positions similar to yours?</p>	Yes	
<p>c. If so, provide name of other parties: SDG&E, PG&E, SCE, DRA, Sustainable Conservation, TURN, UCS, NRDC, CA Farm Bureau, CEERT, IEP</p>		
<p>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>		

<p>This proceeding covered a wide variety of topics related to California’s RPS program. The Green Power Institute has been an active participant in the Commission’s RPS proceedings since the inception of the program, and is continuing these efforts in the present proceeding (R.11-05-005). We regularly collaborate and coordinate with other parties, and join with others on filings when it makes sense to do so.</p> <p>The GPI coordinated its efforts in this proceeding with other parties in order to avoid duplication of effort, and thereby added significantly to the outcome of the Commission’s deliberations. In particular, we worked with and filed jointly with Sustainable Conservation, and with other parties, in developing our Comments on the SB 32 track of the proceeding. 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):

11	#	Claimant	CPUC	Comment

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

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

12	<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 this Proceeding, R.11-05-005, and in the Predecessor RPS proceeding (R.08-08-009)) that are relevant to matters covered by this Claim, and a detailed breakdown of GPI staff time spent for work performed that was directly related to our substantial contributions to Decisions D.11-12-020, D.11-12-052, D.12-05-035, and D.12-06-038.</p> <p>The hours claimed herein in support of Decisions D.11-12-020, D.11-12-052, D.12-05-035, and D.12-06-038 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. We were also assisted by our capable Associates, Logan Winston and Vennessia Whiddon. 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. Contemporaneous hours that have been expended in this proceeding on matters that are still pending before the</p>	CPUC Verified
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<p>Commission are not included in this Claim. 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>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.</p> <p>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.</p> <p>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, and is now working on her own, including as an associate of the Green Power Institute.</p>	
<p>b. Reasonableness of Hours Claimed.</p> <p>The GPI made Significant Contributions to Decisions D.11-12-020, D.11-12-052, D.12-05-035, and D.12-06-038 by providing a series of Commission filings on the various topics that were under consideration in the Proceeding, and are covered by this Claim. A good deal of the work that we did was highly technical in nature, including developing and applying sophisticated models in the course of analyzing and documenting the performance of the RPS program in California. 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>	

c. Allocation of Hours by Issue		
1. General Programmatic, RPS Compliance Monitoring & Analysis	30%	
2. Set Procurement Targets	21%	
3. Portfolio Content Categories	14%	
4. RPS Compliance Rules	19%	
5. RPS Reporting Rules	4%	
6. FIT Tariff Revisions	12%	

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	2011	286.0	\$240	D.11-07-025	\$ 68,640			
G. Morris	2012	73.0	\$240	draft Res.ALJ-281	\$ 17,520			
L. Winston	2011	20.0	\$ 70	D.11-09-013	\$ 1,400			
V.Whiddon	2011	26.0	\$ 70	See comment #1	\$ 1,820			
V.Whiddon	2012	15.0	\$ 70	draft Res.ALJ-281	\$ 1,050			
Subtotal:					\$ 90,430	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 \$
Subtotal:						Subtotal:		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
G. Morris	2012	16	\$120	½ regular	\$ 1,920			
Subtotal:					\$ 1,920	Subtotal:		
COSTS								
#	Item	Detail			Amount	Amount		
	Postage	See Attachment 2			\$ 69			
Subtotal:					\$ 69	Subtotal:		
TOTAL REQUEST \$:					\$ 92,419	TOTAL AWARD \$:		

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):

18	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. Please note that we made the identical case for Ms. Whiddon's hourly rate in a Compensation Claim filed on June 18, 2012, in R.10-05-006.</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):

19	#	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.