

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans.	Rulemaking 12-03-014 (Filed March 22, 2012)
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CLAIM AND DECISION ON REQUEST FOR INTERVENOR COMPENSATION

Claimant: Clean Coalition	For contribution to D.12-12-010 and D.13-02-015	
Claimed (\$): 31,608.5	Awarded (\$):	
Assigned Commissioner: Florio	Assigned ALJ: Gamson	
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:		/s/ Dyana Delfin-Polk
Date: 2/20/13	Printed Name:	Dyana Delfin-Polk

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

A. Brief Description of Decision: D.12-12-010 (Track 2): Adopted Standardized Planning Assumptions
 D.13-03-015 (Track 1): Adopted Local Capacity Requirements

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 (§ 1804(a)):		

1. Date of Prehearing Conference:	April 18, 2012	
2. Other Specified Date for NOI:		
3. Date NOI Filed:	*See Attachment 4, explanation of NOI	
4. Was the notice of intent timely filed?		
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	R.10-05-006	
6. Date of ALJ ruling:	July 19, 2011	
7. Based on another CPUC determination (specify):	D.12-09-014	
8. Has the claimant demonstrated customer or customer-related status?		
Showing of "significant financial hardship" (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	R.10-05-006	
10. Date of ALJ ruling:	July 19, 2011	
11. Based on another CPUC determination (specify):	D.12-09-014	
12. Has the claimant demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision	D.12-12-010 and D.13-02-015	
14. Date of Issuance of Final Decision:	Dec. 20, 2012 for D.12-12-010 and Feb. 13, 2013 for D. 13-02-015	
15. File date of compensation request:	February 20 th , 2013	
16. Was the request for compensation timely?		Yes

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

#	Claimant	CPUC	Comment
			Attachment "A": Detailed explanation of notice of intent to claim intervenor compensation

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

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

Contribution	Citation to Decision or Record	Showing Accepted by CPUC
<p><u>TRACK 2 (D.12-12-010)</u></p> <p>The Clean Coalition has been heavily involved in this iteration of the LTPP, especially in advocating for DG+IG resources¹.</p> <p>All filings submitted by the Clean Coalition for Track 2 are as follows:</p> <ul style="list-style-type: none"> • Clean Coalition's Reply Comments on Straw Proposal on 2012 LTPP Standards (June 11th, 2012) • Clean Coalition Policy Comments on Revised Proposed Scenarios in R. 12-03-014 (October 5th, 2012) • Clean Coalition Technical Comments (September 7th, 2012) • Additional Clean Coalition 	<p>"Alliance for Nuclear Responsibility, Clean Coalition, California Cogeneration Council, CCSF, DRA, Natural Resources Defense Council, PG&E, SCE, SDG&E, The Utility Reform Network all indicated in their comments on the proposed decision different assumptions or scenarios they would like the Commission to examine." (D. 12-12-010 at 10)</p>	

¹ "DG+IG" (distributed generation plus intelligent grid) includes the appropriately aggressive use of distributed generation (especially wholesale) deployed in conjunction with "intelligent grid" resources, which includes demand response, energy storage, advanced inverters and monitoring communications and controls (known as MC²).

<p>Technical Comments, (September 11th, 2012)</p> <ul style="list-style-type: none"> • Clean Coalition Reply Comments on Track 2 Scenarios (October 19th, 2012) • Clean Coalition Opening Comments on Track 2 PD (December 10th, 2012) • Reply Comments of the California Environmental Justice Alliance, Sierra Club California, Union of Concerned Scientists, Clean Coalition and Community Environmental Council on the Proposed Decision on Long Term Procurement Plans and Assumptions, December 17th, 2012 <p>The Clean Coalition also participated in an ex parte meeting with Marcelo Poirier and participated in the LTPP scenarios workshop held at the California Public Utilities on August 13th, 2012.</p> <p>Many elements of our recommendations were included in the adopted planning assumptions, and we sought to highlight the stark differences between the Energy Division’s Straw Proposal and the Proposed Decision, which we view as a result of our involvement in the proceeding. Specific recommendations include:</p>		
<p>Inclusion of Gov. Brown’s 12,000 MW of Distributed Generation (DG)</p> <p>The Clean Coalition recommended</p>	<p>The Commission adopted our recommendation by mentioning the Governor’s goal throughout both Track 1 and Track 2 decision:</p>	

<p>that the Governor’s 12,000 MW DG goal and distributed generation more generally be prioritized in this proceeding, in the following filings: Clean Coalition’s Reply Comments on Straw Proposal on 2012 LTPP Standards, June 11th, 2012, Clean Coalition Technical Comments, September 7th, 2012, Additional Clean Coalition Technical Comments, September 11th, 2012, Clean Coalition Reply Comments on Track 2 Scenarios, October 19th, 2012, Clean Coalition Opening Comments on Track 2 PD, December 10th, 2012.</p>	<p>“The Governor has made the adoption of distributed generation a priority. [Reference to Governor’s 12,000 MW of DG goal]. This scenario was created to project the general implications of this state policy of promoting high amounts of distributed generation and demand side resources...” (D. 12-12-010 at 17).</p>	
<p>Inclusion of a 40% or higher RPS scenario/sensitivity</p> <p>The Clean Coalition (in joint comments with the Natural Resource Defense Council, the Community Environmental Council, the Sierra Club, Union of Concerned Scientists and the California Environmental Justice Alliance) recommended that the Commission reject Southern California Edison’s recommendation to remove the sensitivity that examines a higher RPS target beyond 2020. (Specific filings that advocate for a higher RPS scenario/sensitivity include: Clean Coalition’s Reply Comments on Straw Proposal on 2012 LTPP Standards, June 11th, 2012, Clean Coalition Opening Comments on the Proposed Decision on the Proposed Decision on Long Term Procurement Plans and Assumptions, December 10th, 2012 and Reply Comments of the</p>	<p>Despite utility arguments that the <i>High Distributed Generation, High Demand Side Management, 40% RPS by 2030 Sensitivity</i> be removed from the list of scenarios, the Decision opted to keep this scenario: “This scenario marks an effort to begin creating a body of analysis around the operational impacts associated with a higher RPS target beyond 2020.” (D. 12-12-010 at 19).</p>	

<p>California Environmental Justice Alliance, Sierra Club California, Union of Concerned Scientists, Clean Coalition and Community Environmental Council on the Proposed Decision on Long Term Procurement Plans and Assumptions, December 17th, 2012. In addition, we discussed this issue in an ex parte meeting with Marcelo Poirier, Advisor to Assigned Commissioner Michel Florio on December 17th, 2012.</p>		
<p>High Distributed Generation, High Demand Side Management Scenario</p> <p>The Clean Coalition has continuously advocated for appropriately aggressive use of distributed generation in long-term planning. Specifically, the Clean Coalition stated that "...[we] also strongly support the shift in policy favoring a higher balance of distributed generation resources over large-scale centralized generation and its associated operational and capital risk impacts." (Clean Coalition Policy Comments on Revised Proposed Scenarios in R. 12-03-014, October 5, 2012 at 7).</p> <p>Additional filings that recommend inclusion of distributed generation include: Clean Coalition's Reply Comments on Straw Proposal on 2012 LTPP Standards, June 11th, 2012 and Clean Coalition Policy Comments on Revised Proposed Scenarios in R. 12-03-014, October 5th, 2012)</p>	<p>The Commission followed our recommendation by including a scenario specifically designed to look at high penetration of DG: "The [<i>High Distributed Generation, High Demand Side Management Scenario</i>] requires a change to RPS policy, moving away from central station generation by altering the procurement direction in favor of distributed generation resources." (D. 12-12-010 at 18)</p>	

<p><u>TRACK 1 (D.13-02-015)</u></p> <p>The Clean Coalition’s primary goal for this track (as described in all relevant filings) was the appropriately aggressive inclusion of DG+IG resources in fulfilling local capacity requirements and increased levels of renewables. Specifically, in our Opening Comments on the Proposed Decision (January 14th, 2013), we urged “the Commission to ensure, through policy and coordinated action in other proceedings, that market mechanisms are established to develop these preferred resources to meet local capacity requirements (LCR) within the required scale and schedule.” (Clean Coalition Opening Comments on the Proposed Decision, dated January 14th at 2).</p> <p>The complete list of Clean Coalition filing contributions for Track 1 are as follows:</p> <ul style="list-style-type: none"> • Clean Coalition Comments on Joint ES/LTPP Workshop topics (October 9th, 2012) • Clean Coalition’s Reply Brief on Track 1 Issues (October 12th, 2012) • Response to the Megawatt Storage Farms Motion by the Clean Coalition and the California Environmental Justice Alliance (October 22nd, 2012) 	<p>The Commission adopted our recommendation by requiring SCE to show full consideration of DG and other preferred resources in its LCR procurement: “In its proposed procurement plan to be reviewed by Energy Division, Southern California Edison Company shall show that it has a specific plan to undertake integration of energy efficiency, demand response, energy storage and distributed generation resources in order to meet or reduce local capacity requirement needs through 2021.” (D. 13-02-015 at 133)</p>	
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<ul style="list-style-type: none"> • Reply on Joint ES/LTPP Workshop Topics (October 23rd, 2012) • Clean Coalition Opening Comments on the Proposed Decision (January 14th, 2013) • Comments of the NRDC, Clean Coalition and the Community Environmental Council on the Proposed Decision Authorizing Long-Term Procurement for Local Capacity Requirements (January 14th, 2013) • Clean Coalition Reply Comments on Proposed Decision Authorizing Long-Term Procurement for Local Capacity Requirements (January 22nd, 2013) <p>The Clean Coalition participated in the evidentiary hearings held in August of 2012 at the California Public Utilities Commission as well as attended ex parte meetings with the Energy Advisors for Commissioners Florio, Ferron, Peterman and Sandoval in February 2012. Lastly, we also participated in the joint Storage/LTPP workshop held at the California Public Utilities Commission on September 7th, 2012.</p>		
<p>Inclusion of Energy Storage in satisfying Local Capacity</p>	<p>The Commission followed our</p>	

Requirements

The Clean Coalition, in conjunction with the California Environmental Justice Alliance, filed a response to the Megawatt Storage Farms., Inc motion to add energy storage to the top of the established Loading Order. In our joint comments (dated October 22nd, 2012), we state “energy storage is not only an important resource; it is an essential part of meeting our GHG goals and integrating renewables into the grid.” (Joint Comments: CEJA and Clean Coalition, dated October 22nd, 2012 at 2). In addition, in our Opening Comments and Reply Comments to the Proposed Decision, we urged the Commission to retain the 50 MW of Energy Storage procurement that was included in the Proposed Decision (which was opposed by Southern California Edison and other utilities). As we stated in our Opening Comments, this procurement target for Energy Storage was “a significant win for Energy Storage in California and the Clean Coalition is pleased to see it included in this Proposed Decision. It is our hope that the Commission and the utilities see the 50 MW as a floor, not a ceiling and proceed to procure additional ES as a preferred resource within the continuing LTPP and the coordinated ES proceeding (R.10-12-007) (Clean Coalition Opening Comments on the Proposed Decision, dated January 14th, 2013 at 3).

recommendation by requiring that “At least 50 MW must be procured from energy storage resources.” (D. 13-02-015 at 2).

“We have determined that a significant amount of these resources may be available to meet or reduce LCR needs by 2021, even beyond the projections in the ISO models.” (D. 13-02-015 at 133).

<p>Adherence to the Loading Order for all procurement</p> <p>All of our comments (Opening and Reply Comments, joint comments with NRDC, Sierra Club California, the California Environmental Justice Alliance and the Community Environmental Council) have urged the Commission to include strict adherence to the Loading Order for preferred resources, consistent with the Energy Action Plan.</p> <p>In addition, The Clean Coalition (in Opening Comments on the Proposed Decision at 5) reiterated the importance of the ALJ's statement that "once procurement targets are achieved for preferred resources, the IOUs are not relieved of their duty to follow the Loading Order." We supported the Commission in ensuring that the utilities do not treat procurement targets as ceilings. This was reflected in the Final Decision.</p>	<p>The Commission, based in part on our recommendations, re-affirmed its commitment to an ongoing Loading Order approach: ... "the ongoing Loading Order approach is more consistent with Commission policy [than alternatives proposed by other parties." (D. 13-02-015 at 11).</p> <p>"Once procurement targets are achieved for preferred resources, the IOUs are not relieved of their duty to follow the Loading Order." (D. 13-02-015 at 10)</p>	
<p>Appropriately aggressive use of preferred resources to meet LCR needs, consistent with the Energy Action Plan Loading Order</p> <p>The Clean Coalition has been consistent in urging the Commission to continue the appropriately aggressive pursuit of preferred resources to meet the LCR needs, specifically in Southern California. We made this recommendation known in all of our comments on Track 1 LCR issues as well as in our four <i>ex parte</i> meetings with Energy advisors for</p>	<p>Due in part to our advocacy, the Commission made a significant change from the PD, by including mandated procurement for preferred resources as well as for gas generation and energy storage (the PD contained no mandated procurement for preferred resources): "For the LA Basin, SCE may procure up to 600 MW of preferred resources (as opposed to an authorization of 250-450 MW in the PD), subject to the overall 1800</p>	

<p>Commissioners Sandoval, Florio, Peterman and Ferron (February 4th, 7th and 8th, 2013 respectively). Our direct recommendation of additional MW of preferred resource procurement levels have been included in the Final Decision in the form of the 150 additional MW of preferred resource procurement (for a total of 600 MW). <u>This was a substantial change from the PD</u> and our advocacy certainly played a role in that change.</p>	<p>MW cap.” (D. 13-02-015 at 118).</p> <p>“All additional resources beyond the minimum requirement must also be from preferred resources, or from energy storage resources.” (D. 13-02-015 at 83).</p>	
<p>Inclusion of Demand Response resources in modeling for LCR</p> <p>In all comments filed in this proceeding, the Clean Coalition has recommended that the Commission recognize Demand Response as an important resource in meeting LCR needs, especially in Southern California consistent with Commission policy and the Loading Order. Specifically, “DR should be further recognized as an importance resource in meeting LCR needs by the ISO and utilities and should be included in future modeling.” (Clean Coalition Opening Comments on Proposed Decision Authorizing Long-Term Procurement for Local Capacity Requirements, January 14th, 2013 at 2).</p> <p>The inclusion of significant Demand Response resources in the Final Decision, as an offset for projected Local Capacity Requirements and contrary to CAISO’s recommendations against (and consistent with the Loading</p>	<p>“Preferred resources include energy efficiency, demand response, and distributed generation including combined heat and power.” (D. 13-02-015 at 3).</p> <p>“No capacity from demand response was included in any ISO analysis because the ISO “does not believe that demand response can be relied upon to address local capacity needs...the ISO claims “demand response does not have these characteristics at this time.” (D. 12-03-015 at 10).</p> <p>“We agree that demand response programs are important resources in the California electricity system.” (D. 13-02-015 at 53).</p> <p>“In other proceedings, we are moving forward to promote cost-effective demand response and to integrate demand response programs as reliability resources. “ (D. 13-02-015 at 55)</p>	

<p>Order) was the direct result, at least in part, of our constant advocacy for its inclusion in calculating LCR.</p>		
<p>Issuing an all-source RFO for LCR that does not exclude any preferred resources</p> <p>“We support the direction of the PD that no RFO requirements explicitly or implicitly exclude any preferred resources, and strongly recommend thorough application of this standard in review of RFO requirements.” (Clean Coalition Opening Comments on the Proposed Decision Authorizing Long-Term Procurement of Local Capacity Requirements, January 14th, 2013 at 11).</p> <p>As stated in our ex parte meetings and in numerous comments, the Clean Coalition supports an all-source RFO that did not implicitly or explicitly exclude any preferred resources. We believe this to be a positive inclusion in the Final Decision, and one that will create market mechanisms, use aggregated capacities and facilities as well as combine the various DG+IG resources to meet existing needs. This is a more effective way to meet these needs, rather than requiring that all services be sourced from a single facility (using gas generation qualities) to define operational characteristics.</p>	<p>The Commission adopted our recommendation: “No provisions specifically or implicitly excluding any resource from the bidding process due to resource type (except as authorized in this Order).” (D. 13-02-015 at 132).</p>	

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

	Claimant	CPUC Verified
a. Was DRA a party to the proceeding? (Y/N)	Y	
b. Were there other parties to the proceeding? (Y/N)	Y	

c. If so, provide name of other parties:

For D. 12-12-010, the other parties included: Abengoa Solar, Inc.; Alliance for Nuclear Responsibility; California Cogeneration Council; California Environmental Justice Alliance; California Independent System Operator (CAISO or ISO); Center for Energy Efficiency and Renewable Technologies; City and County of San Francisco; Direct Access Customer Coalition; Distributed Energy Customer Advocates; Division of Ratepayer Advocates (DRA); Friends of the Earth; Green Power Institute; Large Scale Solar Association; L. Jan Reid; Natural Resources Defense Council and Community Environmental Council; Pacific Gas and Electric Company (PG&E); San Diego Gas & Electric Company (SDG&E); The City and County of San Francisco (CCSF); Sierra Club and Union of Concerned Scientists; Southern California Edison Company (SCE); The Utility Reform Network; Women's Energy Matters; and Zephyr Power Transmission LLC and Pathfinder Renewable Wind Energy LLC.

For D. 13-02-015, parties included: AES Southland (AES); Alliance for Retail Energy Markets, Direct Access Customer Coalition and Marin Energy Authority (collectively, AREM); California Cogeneration Council CCC); California Energy Storage Alliance (CESA); California Environmental Justice Alliance (CEJA); CAISO or ISO; California Large Energy Consumer's Association (CLECA); Calpine Corporation (Calpine); Center for Energy Efficiency and Renewable Technologies (CEERT); Cogeneration Association of California (CAC); Division of Ratepayer Advocates (DRA); EnerNOC, Inc. (EnerNOC); GenOn Energy, Inc. (GenOn); Independent Energy Producers Association (IEP); Natural Resources Defense Council (NRDC); Pacific Gas and Electric Company (PG&E); San Diego Gas and Electric Company (SDG&E); Southern California Edison Company (SCE); South San Joaquin Irrigation District (SSJID); The Utility Reform Network (TURN); The Vote Solar Initiative (Vote Solar); and Women's Energy Matters (WEM). Additional parties included: Alliance for Nuclear Responsibility (ANR); Beacon Power, LLC; City and County of San Francisco; Community Environmental Council; Distributed Energy Consumer Advocates; Ormat Technologies; and Sierra Club California (Sierra Club).

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:

The Clean Coalition's compensation in this proceeding should not be reduced for duplication of the showings of other parties. With respect to both D.12-12-010 and D. 13-02-015, the Clean Coalition took the lead in collaboration with other environmental groups, which included the

California Environmental Justice Alliance, Sierra Club California, Union of Concern Scientists, Natural Resources Defense Council and the Community Environmental Council. This collaboration led to joint comments and complementary reply comments, which essentially avoided duplication of efforts.	
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C. Additional Comments on Part II (use line reference # or letter as appropriate):

#	Claimant	CPUC	Comment

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

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

Concise explanation as to how the cost of claimant's participation bears a reasonable relationship with benefits realized through participation (include references to record, where appropriate)	CPUC Verified
<p>The Clean Coalition formally intervened in R. 12-03-014 on June 4th, 2012 and has been an active party since. The Long-Term Procurement Planning Process (LTPP) is meant "to continue our efforts through integration and refinement of a comprehensive set of procurement policies, practices, and procedures underlying long-term procurement plans." With respect to D. 12-12-010 and D. 13-02-015, the Clean Coalition's efforts were directed at ensuring that the appropriately aggressive use of distributed generation alongside "intelligent grid" (collectively DG+IG) options were properly evaluated and considered in planning assumptions and to fulfill local capacity requirements (LCR).</p> <p>Our efforts to ensure that DG+IG programs were included in the final decision for Tracks 1 and 2 will result in increased cost-effective and environmentally beneficial renewable energy for all ratepayers and taxpayers in California. There was essentially no duplication of efforts addressed by the Clean Coalition and other parties as we worked to ensure that only personnel essential to these matters worked on these matters. Policy Associate Dyana Delfin-Polk and Director of Economics and Policy Analysis Programs, Kenneth Sahm White took the lead in drafting comments and leading collaboration with other parties. Associate Executive Director Ted Ko provided oversight of comments and took the lead</p>	

in ex parte meetings with Energy advisors and Executive Director, Craig Lewis made himself available for testimony during evidentiary hearings. We were always careful in terms of using the most appropriate personnel for each task.

In terms of allocation of time between issues in this proceeding, there were three overarching issues that Clean Coalition focused upon: the need for the Commission to seriously evaluate and use DG+IG resources and to ensure that established State goals were met (including the Renewable Portfolio Standard, the Governor's 12,000 MW of Distributed Generation (DG) goal and strict adherence to the State's Loading Order for preferred resources), all of which are well within the scope of each track. The Clean Coalition spent the majority of time and effort on these particular issues, as is represented in the record, and in leading collaborative efforts with other groups.

B. Specific Claim:

CLAIMED						CPUC AWARD			
ADVOCATE FEES									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
Dyana Delfin-Polk	2012	\$75	203.2	D.11-10-040 ² and Res. ALJ-241	15,240				
Dyana Delfin-Polk	2013	\$75	37.1	D.11-10-040 and Res. ALJ-281	2,782.5				
Subtotal:					18,022.5				
EXPERT FEES									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$

² D.08-04-010 (p. 9) provides for a 5% annual increase each year within each level of experience (p. 8). See Attachment A for resumes for each Clean Coalition staff.

Craig Lewis ³	2012	13.8	\$170	D.11-10-040 and Res. ALJ-281	2346				
Craig Lewis	2013	.1	\$180	D.11-10-040 and Res. ALJ-281	18				
Ted Ko ⁴	2012	4.15	\$145	D.11-10-040 and Res. ALJ-281	601.75				
Ted Ko	2013	4.75	\$155	D.11-10-040 and Res. ALJ-281	736.25				
Sahm White ⁵	2012	40.25	\$175	D.11-10-040 and Res. ALJ-281	7,043.75				
Sahm White	2013	8.25	\$185	D.11-10-040 and Res. ALJ-281	1,526.25				
Subtotal:					12,272				
OTHER FEES									
Describe here what OTHER HOURLY FEES you are claiming (paralegal, travel, etc.):									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
Ted Ko	2013	Travel: 2 hours	77.5	Half 2013 rate	155				
Dyana Delfin-Polk	2013	Travel:6 hours	37.5	Half 2013 rate	225				
Subtotal:					\$380	Subtotal:			
INTERVENOR COMPENSATION CLAIM PREPARATION **									

³ Lewis has 6 years experience in the renewable energy field and over a decade of experience in the telecommunications field. Lewis is the Executive Director of the Clean Coalition.

⁴ Ko is the Associate Executive Director of the Clean Coalition and has five years of experience in the renewable energy field, with previous experience in the IT field.

⁵ White has 12 years of experience in the energy and clean air field and is the Clean Coalition's Policy Director.

Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
Delfin-Polk	2013	13.7	37.5	D.11-10-040 and Res. ALJ-281 (half rate)	514				
Tam Hunt	2013	2.5	168	D.11-10-040 and Res. ALJ-281 (half rate)	420				
Subtotal:					\$934				

COSTS

#	Item	Detail	Amount	Amount
<i>Subtotal:</i>				<i>Subtotal:</i>
TOTAL REQUEST \$:			31,608.5	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.

**Reasonable claim preparation time typically compensated at ½ of preparer's normal hourly rate.

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

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Time record
3	Staff resumes
4	Explanation of Notice of Intent to Claim Intervenor Compensation

D. CPUC Disallowances & Adjustments (CPUC completes):

#	Reason

PART IV: OPPOSITIONS AND COMMENTS
 Within 30 days after service of this claim, Commission Staff
 or any other party may file a response to the claim (see § 1804(c))

(CPUC completes the remainder of this form)

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

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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)) (Y/N)?

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If not:

Party	Comment	CPUC Disposition

FINDINGS OF FACT

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

CONCLUSION OF LAW

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

ORDER

1. Claimant is awarded \$ _____.
2. Within 30 days of the effective date of this decision, _____ shall pay claimant the total award. Payment of the award shall include interest at the rate earned on prime, three-month

commercial paper as reported in Federal Reserve Statistical Release H.15, beginning _____, 200__, the 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/these] proceeding[s] [is/are] closed.
5. This decision is effective today.

Dated _____, at San Francisco, California.

ATTACHMENT 4: Explanation of Notice of Intent to Claim Intervenor Compensation

The Clean Coalition formally intervened in R. 12-03-014 on June 4th, 2012, well after the prehearing conference and formal dates for timely filing of an NOI. We were then told by the Intervenor Compensation coordinator that our intervenor compensation status from the 2010 LTPP proceeding (R.10-05-006) was still valid for the 2012 LTPP proceeding. This advice was later contradicted by ALJ Gamson, who requested we file a motion to late file Notice of Intent to Claim Intervenor Compensation (which was filed and served on September 25th, 2012). As of today, February 20th, 2013, that motion has not been ruled upon and the Clean Coalition has not been permitted to file an NOI for this proceeding. Policy Associate Dyana Delfin-Polk, Associate Executive Director Ted Ko and Executive Director Craig Lewis have all attempted to contact ALJ Gamson to rule upon this motion, on multiple occasions since the motion was filed. (All attempts to resolve this issue are documented below).

In compliance with established filing deadlines, we are timely submitting our intervenor compensation claim with the expectation that the Commission will not penalize the Clean Coalition for lack of an NOI, as we have attempted to resolve this matter numerous times since September 2012.

<u>Action</u>	<u>Date</u>
Email to ALJ Gamson regarding Motion to Late File NOI, instructed to file document (Polk)	September 19 th , 2012
Motion to Late File NOI Filed and Served (Polk)	September 25 th , 2012
Follow up phone call to CPUC Docket Office placed, instructed to wait for ALJ ruling (Polk)	October 24 th , 2012
Email sent to ALJ Gamson (Polk)	November 19 th , 2012
Phone call placed to ALJ Gamson (Polk)	December 5 th , 2012
Email sent to ALJ Gamson (Polk)	January 9 th , 2013
Phone call placed to ALJ Gamson (Lewis)	February 12 th , 2013
Phone call placed to ALJ Gamson (Ko)	February 14 th , 2013