

Decision \_\_\_\_\_

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Annual Local Procurement Obligations.	Rulemaking 11-10-023 (Filed October 20, 2011)
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**INTERVENOR COMPENSATION CLAIM OF Clean Coalition  
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF Clean Coalition**

<b>Claimant:</b> Clean Coalition	<b>For contribution to D.</b> 13-06-024
<b>Claimed: \$</b> \$23,200.95	<b>Awarded: \$</b>
<b>Assigned Commissioner:</b> Gamson	<b>Assigned ALJ:</b> Ferron
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).	
<b>Signature:</b>	/s/Dyana Delfin-Polk
<b>Date:</b> 9/3/13	<b>Printed Name:</b> Dyana Delfin-Polk

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

<b>A. Brief Description of Decision:</b>	Decision D.13-06-024: Adopts Local Procurement Obligations for 2014, a Flexible Capacity Framework, and Further Refining the Resource Adequacy Program
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**B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:**

	<b>Claimant</b>	<b>CPUC Verified</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	N/A	
2. Other Specified Date for NOI:		
3. Date NOI Filed:	6/13/12	

4. Was the NOI timely filed?		
<b>Showing of customer or customer-related status (§ 1802(b)):</b>		
5. Based on ALJ ruling issued in proceeding number:		
6. Date of ALJ ruling:		
7. Based on another CPUC determination (specify):	D. 12-09-014 found the Clean Coalition to be an eligible customer.	
8. Has the Claimant demonstrated customer or customer-related status?		
<b>Showing of "significant financial hardship" (§ 1802(g)):</b>		
9. Based on ALJ ruling issued in proceeding number:		
10. Date of ALJ ruling:		
11. Based on another CPUC determination (specify):	D.D. 12-09-014 found the Clean Coalition to be an eligible customer.	
12. Has the Claimant demonstrated significant financial hardship?		
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D. 13-06-024	
14. Date of Issuance of Final Order or Decision:	7/3/13	
15. File date of compensation request:	9/3/13	
16. Was the request for compensation timely?		

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

#	Claimant	CPUC	Comment

**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.)**

Contribution	Specific References to Claimant’s Presentations and to Decision	Showing Accepted by CPUC
<p><u>Flexible Capacity Requirements should not be imposed before 2015</u></p> <p>According to the proposal, flexible capacity need is not expected to increase significantly until 2015. CAISO has also created a proposal to procure backstop flexible capacity in the short term. The Clean Coalition believes it would be prudent to fully examine alternatives to flexible capacity procurement and develop counting conventions for demand response and storage resources and creating a fully fleshed out proposal for 2015.” (Clean Coalition’s Comments on December 6<sup>th</sup>, 2012 Phase 2 Scoping Memo, dated December 26<sup>th</sup>, 2012 at 5).</p> <p>“The Commission should not impose a flexible capacity requirement on LSEs for 2014 while need has not been established nor mechanisms evaluated for their efficacy and cost, and compared with alternatives. The Commission</p>	<p><i>The Clean Coalition recommendation that flexible capacity requirements should not be imposed until 2015 was reflected in the Final Decision.</i></p> <p>“Clean Coalition recommends that the Commission not impose a flexible capacity requirement before 2015. Instead, it recommends that the Commission ensure as a matter of policy that preferred resources are fully recognized for their ability to contribute to system needs, including flexible or scheduled ramping, including the potential to use these resources in combination without requiring a priority aggregation of such resources. Further, Clean Coalition advocates the approach to inclusion of use limited resources developed by PG&amp;E for obtaining flexible capacity from hydro resources, for all such resources as appropriate.” (FD at 28)</p> <p>“After consideration of comments, we will not adopt a flexible capacity requirement for the 2014 RA year. We find that the record shows there is not a clear need for additional flexible resources to be under contract in 2014; indeed, there is likely no need for additional flexible</p>	

<p>should ensure that preferred resources are fully recognized for their ability to contribute to system needs, including flexible or scheduled ramping as appropriate for each technology’s characteristics.” (Clean Coalition comments dated April 15th, 2013 at 7).</p> <p>“The Clean Coalition has input CAISO’s model data from a comparable day into a simplified hourly model and would like to take this opportunity to illustrate the impact of several alternative or complimentary approaches.... What we clearly see illustrated however, is that very large scale ramping mitigation is achievable outside of just adding fast ramping generation and associated emissions.... As the marginal costs of energy from conventional generation is much greater when such facilities are only used during peak ramping periods, alternatives that reduce such ramps become increasingly economically attractive and deserve full consideration.” (Clean Coalition comments dated April 15th, 2013 at 8).</p>	<p>resources in that timeframe.” (FD at 38).</p>	
<p><u>Definition of Flexibility/Use of Preferred Resources</u></p> <p>“CAISO has presented information indicating the changing net load patterns expected to develop under current trends and offered a proposal in consort with the major investor owned utilities</p>	<p><i>The Clean Coalition has also provided numerous recommendations regarding the definition of flexibility, including the need to dramatically alter Resource Adequacy standards to address flexibility needs and ensure the proper use of preferred resources. This definition is still forthcoming,</i></p>	

<p>(Joint Parties) to dramatically alter the Resource Adequacy standards to address projected ramping and flexibility needs.... These parties have in no way demonstrated that the Joint Proposal, with or without modifications proposed by PG&amp;E and the Energy Division, appropriately considers impacts on markets, opportunities to shift demand trends and scheduling of system generation, imports, and exports, or consider cost, emissions impacts, and opportunities to use preferred resources to address evolving needs.” (Clean Coalition comments dated April 15th, 2013 at 3).</p> <p>The interim proposal may create a further incentive for thermal generation, as preferred resources would not be able to participate fully due to the lack of counting conventions.... Likewise, we continue to call for review of the defined requirements for flexible capacity, which appear overly modeled on traditional resource characteristics.” (Clean Coalition comments dated December 26<sup>th</sup>, 2012 at 4).</p> <p>“There are several alternatives to flexible capacity procurement which may be more cost-effective and less detrimental to state policy goals and should be examined in detail... [which] include[s] renewable</p>	<p><i>but will be influenced by our continued recommendations that preferred resources should not be discriminated against.</i></p> <p>“A flexible capacity needs determination will be considered and determined in the Commission’s expected June 2014 decision in this docket or its successor. As has occurred in every RA proceeding to date for each year’s LCR levels (without the need for evidentiary hearings), there will be notice to parties and opportunity to comment before the Commission adopts flexible capacity needs and requirements for RA years 2015 and beyond.” (FD at 35).</p> <p>“We agree with parties who advocate for a mechanism to allow preferred resources to participate in the flexible capacity framework we approve today.” (FD at 51).</p>	
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<p>curtailment...advanced inverters and energy storage systems...The Clean Coalition recommends that these alternatives be examined along with the determination of flexibility need that CAISO is undertaking for the flexible capacity proposal.” (Clean Coalition comments dated December 26<sup>th</sup>, 2012 at 4 and 6).</p> <p>“The Clean Coalition believes it would be prudent to fully examine alternatives to flexible capacity procurement and develop counting conventions for demand response and storage resources and creating a fully fleshed out proposal for 2015. The Energy Storage proceeding (R.10-12-007) may produce insights that will assist in creating counting conventions for energy storage resources. It might also be advisable to wait for the resolution of the deliverability for distributed generation initiative to see how these resources could participate in providing flexible capacity.” Clean Coalition comments dated December 26<sup>th</sup>, 2012 at 5).</p>		
<p><u>Inclusion of Hydro in the Final Decision</u></p> <p>The proposed adjustment for “Use Limited Resources” designed to avoid excluding very significant quantities of flexible hydro capacity is an</p>	<p><i>In addition to the advocacy for DG+IG resources, the Clean Coalition also highlighted the importance of hydro for the evolving flexible capacity framework.</i></p> <p>“The Joint Parties’ Proposal should be used as a starting point, along</p>	

<p>appropriate recognition of the need for less restrictive criteria, and similar consideration should be applied to maximize the utility of all resources so as to avoid unwarranted procurement.” (Clean Coalition Opening Comments on the PD, dated June 17<sup>th</sup>, 2013 at 3).</p>	<p>with PG&amp;E’s proposal for counting of hydro resources, for a flexible capacity framework. Between now and June 2014, the Commission should develop rules to allow for the participation of preferred resources within the flexible capacity framework.” (FD at 67)</p> <p>“We will consider . . . rules for the 2015 resource adequacy compliance year, possibly similar to the portion of the adopted framework for use-limited hydro resources.” (FD at 51)</p>	
<p><u>Other Use-Limited Resources</u></p> <p>“The Commission should ensure that preferred resources and other mitigating alternatives are fully recognized for their ability to contribute to system needs, including flexible or scheduled ramping for limited periods, and should adopt for all such resources the approach to inclusion of use limited resources developed by PG&amp;E for obtaining flexible capacity from hydro resources.” (Clean Coalition Opening Comments on the PD, dated June 17<sup>th</sup>, 2013 at 5).</p>	<p><i>In addition to advocating for preferred resources, the Clean Coalition recognizes the significance of use-limited resources and their inclusion in obtaining flexible capacity from hydro resources. This was reflected in the Final Decision.</i></p> <p>“PG&amp;E recommends the Commission and the parties work to ensure that the flexible component of the RA program is structured so that it fully captures all of the flexibility attributes needed to operate the system reliably, and so that it does not unintentionally disadvantage available non-traditional resources (such as demand response, energy efficiency, and storage) that may be able to help meet those flexibility requirements cost-effectively but with less GHG impact than traditional, fossil fuel-powered resources. We will prioritize this issue as a refinement to the adopted interim flexible capacity framework and work with parties to resolve the issue in a decision in June 2014.” (FD at 47)</p>	

<p><u>Additional Use of Preferred Resources</u></p> <p>Procurement mechanisms should be designed to reflect Loading Order for preferred resources consistent with state policy. It is wholly inappropriate to impose unnecessary restrictions on the definition of flexible resources so as to artificially limit the apparent available flexible capacity. The proposed definition of flexible capacity, including the ramp rates, start times, 3 hour period of continuous operation and year round daily availability requirements are operational characteristics of gas turbines. It is not necessary to restrict participation to products offering this full set of operational requirements – facilities offering a portion of these can each provide a subset of the operational needs even if they do not individually meet all of the needs.... While many available facilities may not meet the proposed definition for flexible capacity, together they can provide the services actually needed.” (Clean Coalition comments dated April 5th, 2013 at 7).</p> <p>“The Clean Coalition believes it would be prudent to fully examine alternatives to flexible capacity procurement and develop counting conventions for demand response and</p>	<p><i>The Clean Coalition has continuously advocated for the extensive use of preferred resources throughout our involvement in this proceeding and related proceedings. Our recommendation of ensuring that there are no unnecessary restrictions placed on defining flexible resources is highlighted in the Final Decision.</i></p> <p>“We agree with parties who advocate for a mechanism to allow preferred resources to participate in the flexible capacity framework we approve today. The Joint Parties’ Proposal reduces the ISO’s need for flexible capacity to the essential eligibility standard that the resource must be capable of continuous ramping and sustaining energy output for a minimum of three consecutive hours during an operating day...”(FD at 51).</p>	
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<p>storage resources and creating a fully fleshed out proposal for 2015. The Energy Storage proceeding (R.10-12-007) may produce insights that will assist in creating counting conventions for energy storage resources. The Energy Division’s Revised Proposal (EDP) improves upon the detailed work of the prior proposals and is an appropriate basis for further evaluation and development, however it is premature to adopt at this time.” (Clean Coalition comments dated April 5th, 2013 at 5).</p>		
<p><u>Market-based Mechanisms, Implementation and Next Steps</u></p> <p>“Several parties question or criticize the Joint Parties’ Proposal as discriminating against or not allowing preferred resources to qualify as flexible capacity.” (Clean Coalition April 5, 2013 Comments at 5 – 8)</p> <p>“Further consideration of WECC interconnections and the potential for Energy Imbalance Markets should be incorporated in both determining flexible ramping needs and solutions. California should make full use of all resources, including regional interconnections to integrate and schedule import and export of energy.... Matching short term (1 hour) import and</p>	<p><i>The Clean Coalition, along with other parties, agreement on this sentiment is reflected in comments by numerous parties, including those of the Clean Coalition.</i></p> <p>“Several parties are concerned that both proposals are not appropriately focused on providing market-based price signals that create incentives for the retention of existing and/or development of new resources to meet these needs efficiently and cost-effectively.” (FD at 52)</p> <p>“We have already determined that the existing market mechanisms are insufficient to deal with flexible capacity needs. It may be possible to expand existing market mechanisms, or to develop new market mechanisms, to address this issue (as well as other capacity issues). Today’s decision adopts an interim flexible capacity framework.</p>	

<p>export scheduling with use limited short term resources avoids creation of apparent flexibility shortages that result from failure to recognize such capacity. Working across balancing authorities substantially increases the opportunities to offset and balance ramping requirements at lower cost than developing such capacities within each balancing authority in isolation.” (Clean Coalition comments dated April 5th, 2013 at 8).</p> <p>“This is the time to develop and evaluate solutions before prematurely committing to a path earlier than is warranted, as is clear from the comments and concerns raised by parties across the spectrum. While there is merit in the idea of an early trial of mechanisms before they are actually needed, such trials should start with evaluation of alternative solution sets to develop a comprehensive response, and after being vetted by parties, trialed in a dry run to identify unanticipated factors.”</p> <p>“Almost certainly some combination of options will be more efficient. The Commission should take the time to look at all of them thoroughly rather than pick a non-ideal one now simply because that way a decision can be made as soon as possible.”</p>	<p>As more work goes into consideration of centralized capacity markets and other market mechanisms, it may be appropriate to consider how to integrate a flexible capacity framework into such approaches, or whether to replace the adopted framework with other approaches.” (FD at 52-53)</p> <p>“For the next year, we will gather information, analyze such information, hold workshops to consider refinements to the adopted flexible capacity framework. In workshops and comments, stakeholders will develop counting rules, eligibility criteria, and must-offer obligation for use-limited resources, preferred resources, combined cycle gas turbines, and energy storage resources for Commission consideration.” (FD at 56)</p>	
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<p>“DECA’s comments are of particular note in that they offer a highly contrasting proposed approach. While this alternate proposal is not as fully developed and has not benefitted from months of review by parties, it demonstrates at the very least the range and potential value of not only responding to the identified ramping and flexibility concerns differently, but of differentiating between ramping and flexibility and defining the “problem” differently so as to bring to bear available solution sets that were excluded from the Joint Parties proposal.” (Clean Coalition comments dated April 15th, 2013 at 6).</p>		
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**B. Duplication of Effort (§§ 1801.3(f) & 1802.5):**

	Claimant	CPUC Verified
<p><b>a. Was the Division of Ratepayer Advocates (DRA) a party to the proceeding?</b></p>	Y	
<p><b>b. Were there other parties to the proceeding with positions similar to yours?</b></p>	Y	
<p><b>c. If so, provide name of other parties:</b> Alliance for Retail Energy Markets (AREM); Brookfield Renewable Energy Partners LP; Calpine Corporation (Calpine); CAISO; California Energy Storage Alliance (CESA); California Large Energy Consumers Association (CLECA); California Wind Energy Association (CalWEA); Center for Energy Efficiency and Renewable Technologies (CEERT); City and County of San Francisco (CCSF); Clean Coalition; Distributed Energy Consumer Advocates (DECA); Division of Ratepayer Advocates (DRA); EnerNOC, Inc. (EnerNOC); Independent Energy Producers.</p>		
<p><b>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:</b></p>		

Our involvement in this proceeding was focused on a specific scope of issues with comments submitted as appropriate. In addition to this RA proceeding, the Clean Coalition worked with the California ISO to incorporate their flexible ramping requirement data and extend the modeling to illustrate preferred resource contribution potential, both at the ISO and as it relates to this proceeding. The Clean Coalition also organized coordination and review of party positions with the Sierra Club, Vote Solar, and DRA to insure shared information and address potentially conflicting recommendations to the extent possible, and with the Distributed Energy Consumers Alliance (DECA) in refining their concerns and proposals to the proceeding, including their presentation to the final workshop. While parties did not elect to file joint comments, this effort resulted in the submission of common recommendations from multiple stakeholder perspectives. As always, we present a unique voice focused on smart energy policy that will move us towards a renewable and energy efficient future as quickly as possible while also ensuring that savings accrue to ratepayers in the long-term.

**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):**

<p><b>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)</b></p> <p>The Clean Coalition has been heavily involved for the past two years in the determination of flexible capacity requirements and mitigation measures in this proceeding, in addition to the LTPP proceedings and uncompensated CAISO working groups on development of proposals for Deliverability for Distributed Generation, and both Flexible Capacity and Energy Imbalance markets. Our contribution is further informed through our participation in the Smart Inverter Working Group to ensure that the requisite standards and functionality are available for preferred resources to provide flexible services, visibility, and control to the grid. While this related work informs our contributions, only those hours directly associated with this proceeding are requested for compensation, substantially reducing the cost of offering</p>	<p><b>CPUC Verified</b></p>
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contributions in this proceeding. Our organizational focus is on the development of viable markets for Distributed Generation (DG)+ Intelligent Grid (IG) solutions – including energy storage, demand response, wholesale DG and advanced inverters – to enable the integration of high levels of renewable and distributed generation.

It has been our position that flexible capacity requirements should avoid undercounting the ability of preferred resources and IG mitigation measures to address projected system ramping and flexibility needs, and to ensure that markets and performance requirements to meet these needs in no way discriminate against the aggressive use of preferred resources. This is reflected in the Final Decision in the form of increased preferred resources (which will play a growing role in California’s energy future as we move towards 2020 and beyond), inclusion of initial “use limited” resources and adoption of interim qualification and counting criteria, and deferred determination of need.

The Clean Coalition provides a unique perspective as the leading advocate for the aggressive use of DG+IG solutions to contribute to system reliability, efficiency, and cost effectiveness. While coordination with other parties has resulted in broader appreciation and support for this perspective, no other party represents the arguments that the Clean Coalition regularly advocates: a quick transition to more wholesale distributed generation with increased functionality and Intelligent Grid attributes to accommodate more renewables while reducing or avoiding integration costs to ratepayers.

No other non-profit party has developed the technical expertise to model and evaluate grid requirements and mitigation options, including the provision of ancillary services from DG+IG, particularly as reflected in the modeling results and analysis provided in our comments on the Proposed Decision, which was only possible following the release of recent modeling data from the ISO. Our efforts to ensure that the best design features for distributed generation were included in the Final Decision for this proceeding will result in increasingly cost-effective and environmentally beneficial renewable energy for all ratepayers and taxpayers in California.

Lastly, our analysis and extension of the CAISO “duck graph” not only provides direction for refinement of flexible capacity procurement options, but also provides support for not concluding findings of fact related to the CAISO presentation, thus reducing the need for evidentiary hearings at this time. While not cited in the Decision, the Clean Coalition looks to such contributions to support an efficient proceeding process and to lead towards ratepayer savings in future flexible capacity procurement.

**b. Reasonableness of Hours Claimed.**

<p>We worked to ensure that only personnel essential to these matters worked on each issue. Intelligent Grid Policy Manager Whitney Richardson and Director of Economics and Policy Analysis Kenneth Sahn White took the lead in drafting comments and leading collaboration with other parties on most issues in this proceeding. We relied upon our staff engineer and modeling expert Robert O’Hagan for analytical results both to avoid the cost of contracting external services and because no other organization had developed modeling or analysis of the capacity of preferred resources to address net load ramping issues identified by the ISO. Regulatory Policy Director Stephanie Wang and Policy Manager Dyana Delfin-Polk assisted minimally. We were always careful in terms of using the most appropriate personnel for each task.</p>	
<p><b>c. Allocation of Hours by Issue</b></p> <p>In terms of allocation of time between issues in this proceeding, there were several overarching issues that the Clean Coalition focused upon related to the need for the Commission to seriously evaluate the projected flexible capacity requirements, the potential for use of preferred but “use limited” resources such as DG+IG to address flexible needs, and the impact of unnecessarily restrictive qualifying flexible capacity criteria on the counting of “use limited” resources and their ability to participate in the new market, all of which are central to the scope of this proceeding. The Clean Coalition spent the majority of time and effort on these particular issues, as is represented in the record, and in collaborative efforts with other groups.</p>	

**B. Specific Claim:**

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Whitney Richardson	2012	37	\$95	D.11-10-040 <sup>1</sup> and Res. ALJ-241	\$3,515			
Dyana Delfin-Polk	2012	6	\$80	D.11-10-040 <sup>2</sup> and Res. ALJ-	\$480			

<sup>1</sup> 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.

				281				
Dyana Delfin-Polk	2013	7.6	\$96	D.11-10-040 and Res. ALJ-287	\$729.6			
Kenneth Sahm White	2012	5.5	\$175	D.11-10-040 and Res. ALJ-281	\$962.5			
Kenneth Sahm White	2013	60.5	\$185	D.11-10-040 and Res. ALJ-287	\$11,192.5			
Robert O'Hagan <sup>3</sup>	2013	30	\$165	Res. ALJ-287	\$4,950			
<b>Subtotal: \$21,829.6</b>						<b>Subtotal: \$</b>		
<b>OTHER FEES</b>								
<b>Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):</b>								
<b>Item</b>	<b>Year</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Basis for Rate*</b>	<b>Total \$</b>	<b>Hours</b>	<b>Rate</b>	<b>Total \$</b>
[Person 1]								
[Person 2]								
<b>Subtotal: \$</b>						<b>Subtotal: \$</b>		
<b>INTERVENOR COMPENSATION CLAIM PREPARATION **</b>								
<b>Item</b>	<b>Year</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Basis for Rate*</b>	<b>Total \$</b>	<b>Hours</b>	<b>Rate</b>	<b>Total \$</b>
Dyana Delfin-Polk	2013	21.2	\$48 (half rate)	Res. ALJ 287	\$1,017.6			
Sahm White	2013	3	\$92.5 (half rate)	Res. ALJ 287	\$277.5			
Stephanie Wang	2013	.5	\$152.5 (half rate)	Res. ALJ 287	\$76.25			
<b>Subtotal: \$1,371.35</b>						<b>Subtotal: \$</b>		
<b>COSTS</b>								

<sup>2</sup> 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.**

<sup>3</sup> Robert O'Hagan has 12 years of experience in the engineering and energy fields, respectively. See attached resume in Attachment A.

#	Item	Detail	Amount	Amount
<b>TOTAL REQUEST: \$23,200.95</b>			<b>TOTAL AWARD: \$</b>	
<p>When entering items, type over bracketed text; add additional rows as necessary.            *If hourly rate based on CPUC decision, provide decision number; otherwise, attach rationale.            **Travel and Reasonable Claim preparation time are compensated at ½ of preparer's normal hourly rate.</p>				
Attorney	Date Admitted to CA BAR <sup>4</sup>	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation	
Stephanie Wang	New York Bar: 2004 CA Bar: 2008	257437 & 4271029		

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

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Clean Coalition Time Record
3	Clean Coalition Staff Resumes

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

Item	Reason

**PART IV: OPPOSITIONS AND COMMENTS**

<sup>4</sup> This information may be obtained at: <http://www.calbar.ca.gov/>.



**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)**

<b>A. Opposition: Did any party oppose the Claim?</b>	
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If so:

Party	Reason for Opposition	CPUC Disposition

<b>B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(2)(6))?</b>	
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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 non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75<sup>th</sup> 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.

**Attachment 1:  
Certificate of Service by Customer**

I hereby certify that I have this day served a copy of the foregoing **INTERVENOR COMPENSATION CLAIM OF [Intervenor's Name] AND DECISION ON INTERVENOR COMPENSATION CLAIM** by (check as appropriate):

- hand delivery;
- first-class mail; and/or
- electronic mail

to the following persons appearing on the official Service List:

[Insert names and addresses from official Service List]

Executed this [day] day of [month], [year], at [city], California.

[Signature]

[Typed name and address]