

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission’s Own Motion to Conduct a Comprehensive Examination of Investor Owned Electric Utilities’ Residential Rate Structures, the Transition to Time Varying and Dynamic Rates, and Other Statutory Obligations	Rulemaking 12-06-013 (Filed June 21, 2012)
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INTERVENOR COMPENSATION CLAIM OF THE CENTER FOR ACCESSIBLE TECHNOLOGY AND DECISION ON INTERVENOR COMPENSATION CLAIM OF THE CENTER FOR ACCESSIBLE TECHNOLOGY

Intervenor: Center for Accessible Technology (CforAT)	For contribution to Decision (D.) 14-06-029
Claimed: \$ 55,761.60	Awarded: \$
Assigned Commissioner: Michael Peevey	Assigned ALJ: McKinney & Halligan
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/ Melissa W. Kasnitz
Date: August 18, 2014.	Printed Name: Melissa W. Kasnitz

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

A. Brief description of Decision:	Decision adopts Settlement Agreements setting rate design for the summer of 2014 for PG&E, SCE, and SDG&E, including resolution of how to treat California climate credit.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	October 24, 2012	
2. Other specified date for NOI:	N/A	

3. Date NOI filed:	November 26, 2012. The date thirty days after the PHC fell on Friday, November 23, which was the Friday of Thanksgiving week. CforAT's NOI was filed on the first business day following the Thanksgiving holiday	
4. Was the NOI timely filed?		
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	R.12-06-013	
6. Date of ALJ ruling:	2/25/13	
7. Based on another CPUC determination (specify):	N/A	
8. Has the Intervenor demonstrated customer or customer-related status?		
Showing of "significant financial hardship" (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	R.12-06-013	
10. Date of ALJ ruling:	2/25/13	
11. Based on another CPUC determination (specify):	N/A	
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D. 14-06-029	
14. Date of issuance of Final Order or Decision:	June 19, 2014	
15. File date of compensation request:	August 18, 2014	
16. Was the request for compensation timely?		

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

#	Intervenor's Comment(s)	CPUC Discussion

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

A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059). (For each contribution, support with specific reference to the record.)

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>Phase 2 of this proceeding was established to consider changes to residential rate design to be implemented in advance of the Summer of 2014. The Commission requested that "rate design changes proposed for 2014 should be modest, easy to evaluate, and consistent with AB 327."</p>	<p><i>See generally</i> Assigned Commissioner's Ruling Inviting Utilities to Submit Interim Rate Change Applications (Phase 2 Ruling), issued on October 25, 2014, initiating Phase 2 (quotation is from page 4).</p>	
<p>CforAT, working in conjunction with the Greenlining Institute, assisted the Commission in determining that the IOUs' initial Phase 2 filings were not adequately constrained and should be replaced with more streamlined proposals, deferring key issues to the broader proceeding (or potentially to other proceedings, as may happen with changes in the design of CARE).</p>	<ul style="list-style-type: none"> • Comments of the Greenlining Institute and the Center for Accessible Technology on Procedural Schedule and Need for Evidentiary Hearing (11/8 Comments), filed on 11/8/13 at pp. 4-5 (arguing that changes to CARE should not be included in interim stage of proceeding); • Protest of the Center for Accessible Technology and the Greenlining Institute of the Utilities' Supplemental Filings Proposing Interim Rate Changes (Phase 2) (Phase 2 Protest), filed on 12/23/13 at pp. 8-14 (noting how the IOU applications proposed sweeping changes that could impact CARE, FERA, as Medical Baseline, as well as making fundamental changes to the rate tier structure). • Motion for Evidentiary Hearing of the Center for Accessible Technology and the Greenlining Institute, filed 1/7/14 at pp. 9-13 (again identifying broad sweep of initial IOU proposals, potentially transforming multiple programs for vulnerable customers as well as 	

	<p>fundamental rate structure));</p> <p>Following a PHC on January 8, 2014, the Commission directed the IOUs to replace their initial proposals with more streamlined proposals that would not impact the structure of CARE, FERA or Medical Baseline and that would not fundamentally change the existing rate structure. <i>See</i> Second Amended Scoping Memo and Ruling of Assigned Commissioner and Assigned Administrative Law Judge (Second Amended Scoping Memo), issued on 1/24/14, at pp. 2-3 (directing IOUs to submit simplified proposals that “maintain the existing four-tiered structure and should not entail any major adjustments to California Alternative Rates for Energy (CARE), Family Electric Rate Assistance Program (FERA) or medical baseline programs”).</p>	
<p>CforAT, working in conjunction with the Greenlining Institute, maintained a focus on rate affordability for vulnerable customers in considering changes to rate design for the summer of 2014, both in response to the initial proposals and the subsequent streamlined proposals.</p>	<ul style="list-style-type: none"> • As noted above, CforAT and Greenlining opposed the sweeping changes initially proposed by the IOUs to both rates and various assistance programs. • CforAT and Greenlining prepared testimony on affordability issues, which was entered into the record following the evidentiary hearing. <i>See generally</i> Prepared Testimony of Henry Contreras Addressing Affordability Issue for Vulnerable Consumers for Summer 2014 Rates, dated February 28, 2014 and included in the record as CforAT-01. • CforAT and Greenlining addressed affordability concerns in briefing. Center for Accessible Technology and the Greenlining Institute’s Phase 2 Brief (Opening Brief), filed on 4/7/14 at pp. 2-9. <p>CforAT’s contributions regarding affordability enriched the record and the</p>	

	<p>issues addressed continue to have significant play before the Commission in the broader proceeding. Thus, the work done in this phase of the proceeding to develop the issue substantially contributes to the policy discussion of how to best ensure that rates remain affordable for vulnerable consumers.</p> <p>Throughout this phase and the broader proceeding, CforAT has focused on affordability, which the Commission recognizes as a necessary part of any review of rate design. D.14-06-029 at p. 45 (“As CforAT/Greenlining point out, analysis of residential rate changes must consider affordability”). By ensuring that the issue of affordability for vulnerable customers receives appropriate review, CforAT made a substantial contribution to the Commission’s decision-making process.</p>	
<p>While CforAT was not a party to the Phase 2 settlements adopted in D.14-06-029, our involvement influenced the context of the settlement process, including the Commission’s review of the settlements, and ensured a greater focus on affordability than would have been the case without our participation. It is beyond dispute that affordability is a vital concern, and that attention to this issue at all stages of the proceeding is appropriate and necessary.</p> <p>Moreover, while the Phase 2 settlements are not binding for future changes to rate design in the broader proceeding, CforAT and Greenlining provided testimony and</p>	<p>It is well established that a party may make a substantial contribution to a Commission decision even if its positions are not adopted, as long as the party assisted the decision-making in a proceeding and its contributions enriched the record. This is consistent with the language of the intervenor compensation statute, which places the determination of whether an intervenor made a “substantial contribution” in the judgment of the Commission. Section 1802(i).</p> <p>The Commission has in the past found a substantial contribution for intervenor compensation purposes even where the intervenor’s recommended outcome did not prevail on any issue addressed in the Commission’s decision. Specifically, the Commission has recognized that it “may benefit from an intervenor’s participation even where the</p>	

<p>analysis regarding short-term rate design that will support their advocacy for vulnerable customers as additional changes to rates are considered going forward. This context and the discussion of affordability enrich the record and provide a substantial contribution to the review of changes to rate design, in which affordability has repeatedly been noted as a vital concern.</p>	<p>Commission did not adopt any of the intervenor’s positions or recommendations.” D.08-04-004 (Awarding compensation to TURN following a review of SCE’s contract with Long Beach Generation, A.06-11-007), pp. 5-6. In that case TURN’s opposition focused on the need for the generation resource and its cost-effectiveness. The Commission stated, “The opposition presented by TURN and other intervenors gave us important information regarding all issues that needed to be considered in deciding whether to approve SCE’s application. As a result, we were able to fully consider the consequences of adopting or rejecting the LBG PPA. Our ability to thoroughly analyze and consider all aspects of the proposed PPA would not have been possible without TURN’s participation.” Id., at 6. On this basis the Commission found that TURN had made a substantial contribution even though its positions had not been adopted, and awarded TURN intervenor compensation for all of the reasonable hours devoted to the proceeding.</p> <p>Similarly, in D.10-06-046 the Commission awarded TURN very nearly the full amount requested for its work in SCE’s application seeking ratepayer funding of a carbon sequestration feasibility study, even though TURN opposed such ratepayer funding. Even though the overall outcome did not embrace TURN’s recommendations, the compensation award found that TURN’s efforts constituted a substantial contribution, even commenting, “TURN substantially helped the decisionmaking in this proceeding.” D.10-06-046, p. 5.</p> <p>Here, settling parties were aware that CforAT and Greenlining would be scrutinizing any settlements with a focus</p>	
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	<p>on affordability. The Commission requested additional information on the energy burden that would result from the proposed settlement rate designs at hearing on the settlement; this request was made in response to concerns raised by CforAT at hearing. <i>See</i> Reporter’s Transcript at p. 41:1-42:26; additional data supplied by utilities (“Pursuant to the Ruling of Administrative Law Judge (“ALJ”) McKinney, issued and electronically served on March 26, 2014 and in accordance with the ALJs’ directives during the evidentiary hearing held on March 25, 2014 in Phase 2 of this proceeding. . .”) on April 1, 2014. Subsequently, the Commission provided a substantial discussion in the final decision to the issue of affordability. D.14-06-029 at pp. 45-49.</p> <p>While the final decision did not agree with CforAT’s argument that the proposed settlement rates do not adequately take affordability into consideration, it specifically noted the importance of a review of affordability, as addressed by CforAT and Greenlining. D.14-06-029 at p. 45 (“As CforAT/Greenlining point out, analysis of residential rate changes must consider affordability”). This focus on affordability, and the impact of changes in rate design on vulnerable customers, was appropriate and valuable; thus time spent by CforAT to provide information and analysis of this issue is appropriate for compensation. As in D.08-04-004, the information presented by CforAT and Greenlining gave the Commission important information that needed to be considered in evaluating the proposed settlements. As a result, the Commission was better positioned to fully consider the consequences of adopting or rejecting the settlements, in</p>	
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	a manner that would not have been possible without CforAT and Greenlining’s participation.	
CforAT and Greenlining effectively argued that the California Climate Credit should not be included as an element of rates, ensuring that low-income customers obtain the full benefit of the credit.	<p>CforAT and Greenlining addressed issues regarding the California Climate Credit throughout Phase 2, including as follows:</p> <ul style="list-style-type: none"> • Phase 2 Protest at pp. 7-8. • Motion for Evidentiary Hearings at pp. 8-9. • Opening Brief at p. 12-26; • Center for Accessible Technology and the Greenlining Institute’s Phase 2 Reply Brief, filed on 4/16/14. <p>D.14-06-029 agreed with the positions set out by CforAT and Greenlining and specifically cited CforAT/Greenlining’s arguments with approval. D.14-06-029 at pp. 16-22 (“The language of D.12-12-033, however, better supports the argument of parties, such as CforAT/Greenlining, that the Climate Credit is intended to benefit lower-income customers to a greater degree because a per-household return achieves the policy objective of reversing expected impacts on low-income households”).</p>	

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

	Intervenor’s Assertion	CPUC Discussion
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?¹	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties: Greenlining Institute		

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

<p>While CforAT’s positions have also overlapped at times with other consumer representatives, including TURN and ORA, those consumer groups were parties to the Phase 2 settlements while CforAT did not join them. Thus, for purposes of this compensation request, CforAT believes that the positions of these organizations were not similar.</p>	
<p>d. Intervenor’s claim of non-duplication:</p> <p>Throughout Phase 2 (as well as the broader proceeding), CforAT has specifically advocated on behalf of vulnerable consumers, specifically including our constituency of IOU customers with disabilities, but also more generally customers with low incomes (including a disproportionate number of people with disabilities) and customers who may have difficulty changes behaviors in response to changes in rate design. In representing the needs of vulnerable customers, CforAT has worked closely with the Greenlining Institute, efficiently sharing responsibility and coordinating tasks to jointly advocate for our overlapping constituencies. The two organizations prepared joint filings and coordinated closely to avoid inefficiencies.</p> <p>CforAT and Greenlining did not duplicate the work of other consumer organizations (such as ORA or TURN) in that those organizations did not specifically focus on the needs of the most vulnerable customers in considering changes to rate design that will impact every residential customer of every IOU in the state. Because the interests of the most vulnerable consumers may not be the same as the interests of the residential class as a whole, participation by CforAT (and Greenlining) does not duplicate the efforts of other parties. This is particularly evident where, as here, some consumer representatives participated in the settlements that were adopted in the final decision, while CforAT did not.</p>	

C. Additional Comments on Part II (use line reference # or letter as appropriate):

#	Intervenor’s Comment	CPUC Discussion
	<p>CforAT addresses above its efforts to avoid duplication of effort with other parties. Additionally, the procedural posture of this proceeding raises issues of duplication of effort between work done for Phase 2 (the focus of this compensation request) and for the broader proceeding. CforAT made every effort to identify all time spent on Phase 2 issues and to exclude time spent on the broader proceeding; however it is possible that some time records were not properly identified. To the extent</p>	

	<p>that this is the case, CforAT may potentially address misallocated time in a subsequent compensation request following a decision on the broader issues.</p> <p>More importantly, the affordability issues raised by CforAT in the context of Phase 2 will continue to inform the discussion and review of residential rate design as the broader discussion proceeds. In the event that the Commission finds that time spent by CforAT may not serve as a substantial contribution to a decision adopting settlements to which CforAT was not a party, CforAT seeks permission to revisit (at the appropriate time) the contributions made by its efforts to address affordability as part of the broader proceeding.</p>	
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PART III: REASONABLENESS OF REQUESTED COMPENSATION (to be completed by Intervenor except where indicated)

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

<p>a. Intervenor’s claim of cost reasonableness:</p> <p>Throughout both Phase 2 and the broader proceeding, CforAT has sought to ensure that changes to rate design do not harmfully impact the affordability of necessary supplies of electricity for vulnerable IOU customers, including specifically our constituency of customers with disabilities. For low-income customers, including many customers with disabilities, small changes in dollar amounts can have a large impact on affordability. However, customers who rely on CforAT to advocate for their interests before the Commission cannot afford individual representation.</p> <p>While it is difficult to calculate a financial benefit or direct bill savings to individual customers based on CforAT’s participation in this proceeding, the benefits to vulnerable customers of ensuring that their needs are given due consideration is substantial. Given the importance of electricity and the impact of changes to residential rate design on this population, representation in a proceeding that will likely result in long-lasting and far-reaching changes in rate design constitutes a broad benefit far that outweighs the costs of CforAT’s participation.</p> <p>Overall, CforAT’s participation in this proceeding seeks to advance the interests of our constituency by protecting vulnerable consumers. Given the stakes in this proceeding for setting a rate design structure that is likely to last for years and the</p>	<p><u>CPUC Discussion</u></p>
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<p>relatively small amount of CforAT’s request for intervenor compensation, the Commission should conclude that our overall request is reasonable.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>Phase 2 of this proceeding set rate design to go into effect for each of the three major IOUs in California, impacting almost every IOU customer in the state. It also provides a context for the broader proceeding, including addressing policy issues such as the way to address the California Climate Credit, as well as a framework through which subsequent changes to rate design will likely be considered. In addressing these issues, CforAT provided multiple rounds of written input to the commission, engaged in review and analysis of three separate settlement agreements; provided written testimony and participated at hearing, and provided briefs and comments on a proposed decision. Each of these activities was appropriate in order to effectively participate in this phase of the proceeding. Throughout, CforAT worked in close conjunction with the Greenlining Institute, the other party expressly focused on the needs of vulnerable residential customers, in order to provide effective and efficient advocacy for consumer groups that are similarly situated.</p> <p>Given the importance of rate design issues and the sweeping reach of Phase 2, even as it was intended to be constrained to a modest set of changes to rate design, the hours spent by CforAT to ensure that issues concerning affordability and the impact of rate design changes on vulnerable customers was reasonable.</p>	
<p>c. Allocation of hours by issue:</p> <p>All time allocated in this portion of the proceeding is designated as “Phase 2” time. CforAT did not attempt to break down the time spent on Phase 2 issues into smaller issue areas; however, the main focus of our work on Phase 2 was to address concerns about affordability. This includes all time spent by CforAT’s expert witness Henry Contreras. In participating actively in Phase 2, CforAT also spent time on procedural matters (including the scope of Phase 2) and other matters of general concern (including settlement, though CforAT was not a party to any of the negotiated settlements) and on the issue of how to address the California Climate Credit.</p> <p>Because a separate phase to address interim rate design was not anticipated when CforAT submitted our NOI, no estimate was provided for any such phase.</p> <p>If the Commission believes that a more granular review of hours by issue is appropriate, CforAT requests permission to resubmit this request after conducting a further review of our time records to allocate them into more specific issue categories.</p>	

B. Specific Claim:*

CLAIMED						CPUCA WARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Melissa W. Kasnitz	2013	27.0	\$440	D.13-11-001	\$ 11,880			
Melissa W. Kasnitz	2014	83.2	\$450	See below	\$ 37,440.00			
Henry Contreras	2014	15.5	\$250	See below	\$3,875			
Subtotal: \$ 53,195						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 \$
[Person 1]								
[Person 2]								
Subtotal: \$						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Melissa W. Kasnitz	2014	10	\$225	½ requested standard rate	\$2,250			
Subtotal: \$2,250						Subtotal: \$		
COSTS								
#	Item	Detail			Amount	Amount		
	Expert Fees – Henry J. Contreras	15.5 hours at \$250 per hour. Invoice attached, but compensation is addressed above as an expert fee.			\$0			
	Printing	See attached cost records. Printing costs include SCE settlement documents (\$8.00), 5 hard copies of Contreras Testimony, including attachments (\$250) and a copy of the PD (\$29.75)			\$287.75			
	Postage	See attached cost records. Postage costs include overnight delivery of Contreras Testimony.			\$21.35			
	Transportation	BART round trip to hearings			\$7.50			
TOTAL REQUEST: \$55,761.60						TOTAL AWARD: \$		

**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

**Travel and Reasonable Claim preparation time typically compensated at 1/2 of preparer's normal hourly rate

ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR²	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Melissa W. Kasnitz	December, 1992	162679	No, but member was inactive for several periods before 1997.

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

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	CforAT Time Records for 2013 (Merits)
3	CforAT Time Records for 2014 (Merits)
4	Time Records for Expert Henry Contreras
5	Qualifications of Henry Contreras
6	CforAT Time Records on Compensation
7	Cost Records
	Justification for 2014 Rate for Melissa W. Kasnitz: As noted above, Ms. Kasnitz's approved rate for 2013 is \$440 per hour. No COLA or other rate adjustment has yet been authorized for 2014. However, if a 2% COLA, consistent with what was authorized for 2013, is eventually approved, the appropriate adjustment would result in a rate of \$450 for 2014. To the extent that a different rate adjustment is eventually authorized, CforAT requests that the adopted adjustment be applied in place of this estimate. CforAT has requested a 2014 rate of \$450 for Ms. Kasnitz in other pending compensation requests in other proceedings (e.g. R.11-03-013), but no decision has yet issued authorizing such rate.
	Justification for Expert Rate for Henry Contreras: CforAT seeks a rate of \$250 per hour for Henry J. Contreras, who provided expert testimony in this proceeding regarding the need for affordable electricity among the population of people with disabilities, and vulnerable populations more generally. Mr. Contreras has not previously had a rate set by the Commission.

² This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch> .

Mr. Contreras' statement of qualifications, which was provided with his testimony and included in the record of the proceeding, is attached. As set forth in his statement of qualifications, Mr. Contreras has been working in the area of state policy and disability policy for over 34 years, including over six years in his current position and prior experience in multiple rolls serving in senior legislative staff and consulting positions. This experience includes work as the Chief of Staff and Legal Counsel to the California Assembly Majority Floor Leader the State Director for the Chair of the Assembly Rules Committee; the Chief of Staff to a Member of the House of Representatives; and the Principal Consultant to that same U.S. Representative when she was an Assembly Member prior to her election to Congress. For nearly 10 years, Mr. Contreras served as a Deputy Legislative Counsel for the California Legislature's Legislative Counsel Bureau, which is the non-partisan legal office responsible for drafting legislation and researching and writing oral and written legal opinions, and he also served for a 3-year period as Counsel to the Assembly Education and Higher Education Committees during a period of major reforms to the codes. Mr. Contreras has a law degree and is admitted to the state bar of California (Bar No. 81199), though his membership is currently inactive. Mr. Contreras' requested hourly rate of \$250 is well within the ranges (\$155-\$390 per hour) most recently set by the Commission for experts with any amount over 13 years of experience in Resolution ALJ-267.

D. CPUC Disallowances and Adjustments (CPUC completes):

Item	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 Discussion

B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	
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If not:

Party	Comment	CPUC Discussion

FINDINGS OF FACT

1. Intervenor [has/has not] made a substantial contribution to D._____.
2. The requested hourly rates for Intervenor’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 compensation is \$_____.

CONCLUSION OF LAW

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

ORDER

1. Intervenor is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay Intervenor the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay Intervenor 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 compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal

Revised May 2014

Reserve Statistical Release H.15, beginning [date], the 75th day after the filing of Intervenor'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]