

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	R.12-06-013 (Filed June 21, 2012)
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**INTERVENOR COMPENSATION CLAIM OF The Greenlining Institute
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF The
Greenlining Institute**

Intervenor: The Greenlining Institute	For contribution to Decision (D.) 14-06-029	
Claimed: \$ 58,469.00	Awarded: \$	
Assigned Commissioner: Peevey	Assigned ALJ: McKinney, Sullivan	
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/ Stephanie Chen
Date: 8/18/14	Printed Name:	Stephanie Chen

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

A. Brief description of Decision:	This decision approves summer 2014 residential rate reform for Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company.
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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):	10/24/2012	
2. Other specified date for NOI:	n/a	
3. Date NOI filed:	11/20/2012	
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.10-02-005	
6. Date of ALJ ruling:	March 29, 2010	
7. Based on another CPUC determination (specify):		
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:	n/a	
10. Date of ALJ ruling:	n/a	
11. Based on another CPUC determination (specify):	See comment below	
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:	06/19/2014	
15. File date of compensation request:	8/18/14	
16. Was the request for compensation timely?		

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

#	Intervenor’s Comment(s)	CPUC Discussion
11	<p>Greenlining has several pending requests for a new ruling on its claim of significant financial hardship. However, there are not currently any findings of significant financial hardship within the timeframe necessary to create a rebuttable presumption under § 1804(b)(1).</p> <p>Greenlining is an organization authorized in its Articles of Incorporation to represent the interests of both residential and small telecommunication customers, with particular focus on low-income and of-color communities and customers. A copy of Greenlining’s Articles of Incorporation was previously filed with the Commission in R.10-02-005 (as an attachment to our NOI, filed March 5, 2010). As such, Greenlining is a Category 3 customer as defined in D.98-04-059.</p> <p>As a Category 3 customer, Greenlining must satisfy the “comparison test” by demonstrating</p>	

	<p>that the economic interest of its members and constituencies in the instant proceeding is small relative to the cost of effective participation in the proceeding. Greenlining submits that it satisfies this test.</p> <p>In this proceeding, savings will accrue to customers each month, a few dollars at a time, because of the downward pressure on rates exerted by advocates like Greenlining. Customers who lack the technical and procedural experience to effectively participate at the CPUC are unlikely to do so for their own individual interests, as the cost to do so would be significantly higher than the dollars they would save. These are customers who may otherwise go unrepresented but for Greenlining’s participation.</p> <p>Because the cost of participation exceeds the financial benefit to be reaped by individual customers, Greenlining satisfies the “comparison test” as described above. In satisfying this test, Greenlining submits that it has successfully demonstrated significant financial hardship as appropriate for a Category 3 customer.</p>	

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>1. Procedural Objections (A)</p> <p>Greenlining argued that language used in the <i>Assigned Commissioner’s Ruling Inviting Utilities to Submit Interim Rate Change Applications</i> prejudged the substance of the applications, which was procedurally improper and contradicted the Commission’s Order</p>	<p>Motion of the Greenlining Institute and the Center for Accessible Technology to Strike Portions of the Assigned Commissioner’s Ruling Inviting Utilities to Submit Interim Rate Change Applications, 11/8/13.</p> <p>While our motion was not ultimately granted, Greenlining’s advocacy on the issue maintained a focus on proper due</p>	

<p>Instituting Rulemaking, which set forth an open and unrestricted “blank slate” examination of rate design ideas.</p> <p>Greenlining argued that since a model rate design has yet to be decided, it is improper for the Commission to issue rate design guidelines at this stage. This interim decision should not prioritize certain rate designs, or certain of the 10 rate design policy objectives over others, when an overarching policy decision has yet to be issued on these matters.</p> <p>Greenlining argued that AB 327 does not direct or mandate any specific rate design changes, aside from certain changes to the CARE discount; as such, it is improper for the Commission to infer mandates that the bill does not contain.</p> <p>***</p> <p>Greenlining argued that asking parties to comment on the schedule set forth in the <i>Assigned Commissioner’s Ruling</i> before they know what the applications will contain is improper, as it requires parties to comment without adequate information.</p> <p>Greenlining argued that the schedule proposed in the <i>ACR</i> did not allow sufficient time for intervenors to properly analyze and respond to three unique rate design proposals, especially given that the window of time proposed</p>	<p>process and ensuring that all rate proposals and related commentary received proper consideration.</p> <p>Greenlining submits that our advocacy constitutes a substantial contribution that enriched the record, as discussed further below in Comment, Section C.</p> <p>Comments of the Greenlining Institute and the Center for Accessible Technology on Procedural Schedule and Need for Evidentiary Hearing, 11/8/13.</p>	
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<p>included the Thanksgiving and winter holidays.</p> <p>The proposed timeline would also overlap with Rate Design Window Applications that two IOUs were planning to file. Greenlining argued that this schedule would not afford the parties sufficient due process, and is not necessary for any policy or legislative reason.</p> <p>Greenlining submitted that a the Commission should not undertake a significant restructuring of the CARE discount in the streamlined application process contemplated for these interim rate changes.</p> <p>***</p> <p>Greenlining argued that evidentiary hearings were needed to properly analyze the utilities' rate proposals, including:</p> <ul style="list-style-type: none">- whether they would result in affordable rates for basic usage,- what bill impacts would result from these proposals combined with other recent and pending rate changes,- whether PG&E's proposed reduction in the CARE discount is reasonable,- any consideration, if the Commission entertains it, of the Climate Dividend and bill impacts,- tier consolidation proposals,- the benefits of setting a	<p>The <i>Second Amended Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge</i> issued 1/24/14 directs that the IOUs revise their proposals and exclude any major changes to CARE, among other things. pp. 2-3.</p> <p>Motion for Evidentiary Hearing of the Center for Accessible Technology and the Greenlining Institute, 1/7/14.</p> <p>The <i>Second Amended Scoping Memo And Ruling of Assigned Commissioner and Administrative Law Judge</i>, issued 1/24/14, ordered evidentiary hearings as part of the Commission's review of the utilities revised summer 2014 rate proposals.</p> <p><i>and Administrative Law Judge</i>, issued 1/24/14, ordered evidentiary hearings to consider the simplified rate design proposals IOUs were directed to submit. p.4.</p>	
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<p>model tier ratio,</p> <ul style="list-style-type: none"> - the IOUs' proposals to establish an automatic rate increase mechanism for the lower tiers, - potential impacts to FERA and Medical Baseline 		
<p>2. Advocacy for Moderate Interim Changes (B)</p> <p>Greenlining argued that the IOU summer 2014 rate design proposals failed to consider affordability and the bill impacts created by other recent rate design decisions and concurrently pending proceedings.</p> <p>In particular, Greenlining argued that the transition PG&E proposed for the CARE Discount would be far too rapid and result in significant bill impacts for vulnerable customers.</p> <p>Greenlining argued that the Low Income Needs Assessment should inform the Commission's analysis of the IOUs' rate proposals.</p> <p>Greenlining contended that the</p>	<p>Protest of the Center for Accessible Technology and the Greenlining Institute of the Utilities' Supplemental Filings Proposing Interim Rate Changes (Phase 2) (Protest), 12/23/13, pp. 3-6.</p> <p>Prepared Testimony of Enrique Gallardo Regarding Phase 2 Interim Rate Changes of San Diego Gas & Electric Company on Behalf of the Greenlining Institute and the Center for Accessible Technology (Gallardo SDG&E Testimony), 3/5/14, pp. 2-3.</p> <p>Prepared Testimony of Enrique Gallardo in Phase 2 Interim Rate Application, R.12-06-013 of the Southern California Edison Company on Behalf of the Greenlining Institute and the Center for Accessible Technology, 3/5/14.</p> <p>Protest, p. 6.</p> <p>Protest of the Utilities' Supplemental Filings, 12/23/13, pp. 8-14.</p>	

<p>ACR directed the IOUs to provide modest, easy to evaluate proposals, but the IOU applications actually propose fundamental, long term rate design changes, contrary to Commission direction.</p> <p>Greenlining argued that issues like tier consolidation, tier ratios, and fixed methodologies to automatically raise lower tier rates should not be considered in the extremely streamlined proceeding contemplated for these applications.</p> <p>Greenlining argued that the proposed changes could fundamentally impact FERA and Medical Baseline, and as such are too expansive for this highly streamlined proceeding phase.</p>	<p>Gallardo SDG&E Testimony, pp. 4-5.</p> <p>The <i>Second Amended Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge</i> issued 1/24/14 directs that the IOUs revise their proposals and exclude any major changes to CARE, FERA, or Medical Baseline. It directed that revised proposals must maintain the existing four-tiered rate structure and must prevent bill shock, particularly where changes to the CARE discount are proposed. pp. 2-3.</p>	
<p>3. Review of Utility & Settlement Proposals (C)</p> <p>Greenlining argued that the utility proposals and the proposed settlements fail to properly consider affordability issues, particularly for low income consumers, and as such they should not be adopted. Our joint brief provided ample data showing detrimental bill impacts and impacts on energy burden for vulnerable customers.</p>	<p>Center for Accessible Technology and the Greenlining Institute’s Phase 2 Brief, 4/7/14, pp. 2-12.</p> <p>Greenlining’s contributions regarding the affordability impacts of these settlements have enriched the record, and the issues continue to be a Commission focus in the broader proceeding. As such, our work in this phase to develop the record on the issue substantially contributes to the policy discussion of how to best ensure that rates remain affordable for vulnerable consumers, as required by statute and by the rate design principles set forth to guide this proceeding.</p>	

	<p>In this phase as well as the broader proceeding, Greenlining has maintained a focus on affordability, which the Commission recognizes as an essential principle of rate design. D.14-06-029 notes at p.45 that “[a]s CforAT/ Greenlining point out, analysis of residential rate changes must consider affordability.” Because Greenlining has ensured that the issue of affordability receives sufficient review, Greenlining has made a substantial contribution to the decision-making process.</p>	
<p>4. Climate Credit (D)</p> <p>Greenlining argued that the Climate Dividend is not a component of rates, but rather a portion of revenue generated by the state of California’s greenhouse gas reduction efforts, and as such the bill impact calculations the IOUs include in their proposals should not consider the Climate Dividend. Similarly, the IOUs’ calculations of the effective CARE discount should not consider the Climate Dividend.</p>	<p>Protest of the Center for Accessible Technology and the Greenlining Institute of the Utilities’ Supplemental Filings Proposing Interim Rate Changes (Phase 2), 12/23/13, pp. 7-8.</p> <p>Center for Accessible Technology and the Greenlining Institute’s Phase 2 Brief, 4/7/14, pp. 12-26.</p> <p>Center for Accessible Technology and the Greenlining Institute’s Phase 2 Reply Brief, 4/16/14.</p> <p>Comments on the Proposed Decision of the Greenlining Institute, 5/29/14.</p> <p>The Email Ruling Requiring Additional Information, issued 3/26/14, asked the parties to address in upcoming briefs the question of whether the California Climate Credit should be included in calculating the effective CARE discount.</p> <p>D.14-06-029, p.18, agrees with Greenlining’s/CforAT’s joint assertion that the issue must be addressed in this proceeding because it is within the scope of evaluating the rate proposals and was initially raised by the IOUs</p>	

	<p>themselves. It determined to resolve the issue in this proceeding.</p> <p>D.14-06-029, p.17, notes that “[t]he GHG allowance revenues have a different source and purpose than revenues collected from customers to pay for electricity charges. Pursuant to law, revenues from the sale of GHG allowances allocated to the utilities pass through the hands of the utilities, but are at all times part of a separate state program.” (citing Cal. Pub. Util. Code Section 748.5 and 17 Cal Code of Regulations Section 95800)</p> <p>D.14-06-029, p.20, finds that although not specifically addressed in statute, when taken together sections 739(c)(1) and 748.5 clearly indicate that the Climate credit must not be included in the calculation of the CARE effective discount. It agrees with Greenlining/CforAT at p.21 in stating that the intent of the Climate Credit as designed (on an equal per-household basis) is in part to mitigate some of the impacts of climate change mitigation costs on low income households, and that considering the Credit as part of the CARE discount would run counter to that intent and negate the Credit’s intended impact.</p> <p>Finally, D.14-06-029 at p.22 notes that the Climate Credit should likewise not be considered in determining the bill impacts of the proposed rate changes, for reasons similar to those supporting the decision not to consider the Credit in calculating the effective CARE discount.</p>	
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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: Center for Accessible Technologies, Utility Consumer Action Network, The Utility Reform Network, Natural Resources Defense Council. (UCAN, TURN, and NRDC all took similar positions regarding the climate credit issue, but not on other issues on which Greenlining advocated)		
d. Intervenor's claim of non-duplication: Greenlining coordinated closely with the Center for Accessible Technology through most of Phase II, filing together whenever possible to maximize coordination and avoid duplication. Greenlining coordinated with other consumer advocate parties wherever possible, though differences in position prevented close collaboration. Greenlining participated in direct conversations with the IOUs and with other parties regarding the proposals, and participated in settlement negotiations, in an attempt to reach consensus. Where Greenlining did not agree with other intervenors, there was no duplication of effort.		

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

#	Intervenor's Comment	CPUC Discussion
II.A.	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 makes contributions that benefitted and enhanced the Commission's consideration of the issues at hand. While the final decision did not agree with Greenlining's arguments around affordability	

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>and due process (as noted above), 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 Greenlining to provide information and analysis of these issues is appropriate for compensation.</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):

a. Intervenor’s claim of cost reasonableness:	CPUC Discussion
<p>In this proceeding, Greenlining’s participation put downward pressure on rates for customers who can least afford rate increases. As such, Greenlining’s participation likely saved customers several dollars per month, or more, on their summer electric bills. Given that one third of California electric customers are enrolled in CARE and millions more who make just a little too much to qualify struggle to make ends meet each month, these dollars add up to significant savings to California’s low income consumers over the course of the summer. In comparison, the cost of Greenlining’s participation is minimal and quite reasonable.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>Greenlining streamlined its participation to minimize time spent wherever possible, primarily by collaborating closely with the Center for Accessible Technology. While the time spent on this phase of the proceeding does account for a significant portion of the time Greenlining estimated in its NOI, it was not possible at the time of the NOI to anticipate the number of issues that would arise in this proceeding, the split into multiple phases, and the number of other proceedings (Rate Design Windows, for example) that would be collapsed into this proceeding.</p> <p>Additionally, there were multiple scoping memos issued in this phase, as well as multiple utility proposals to analyze and discuss with other stakeholders. Given the complex nature of this Phase of the proceeding,</p>	

and the measures Greenlining took to streamline its participation wherever possible, Greenlining submits that our hours claimed are very reasonable.	
<p>c. Allocation of hours by issue:</p> <p>A. Procedural Objections = 13.0%</p> <p>B. Advocacy for Moderate Interim Changes = 12.7%</p> <p>C. Review of Utility & Settlement Proposals = 40.6%</p> <p>D. Climate Credit = 23.1%</p> <p>E. General/Procedural = 10.6%</p>	

B. Specific Claim:*

CLAIMED						CPUCA WARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Enrique Gallardo	2013	45.7	\$390	D.14-02-036	\$17,823			
Enrique Gallardo	2014	99.2	\$400	See Comment 2	\$39,680			
[Expert 1]								
[Expert 2]								
[Advocate 1]								
[Advocate 2]								
Subtotal: \$ 57,503						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 \$
Stephanie Chen	2014	8.4	\$115	See Comment 2	\$966			
[Preparer 2]								
Subtotal: \$ 966						Subtotal: \$		
COSTS								
#	Item	Detail			Amount	Amount		

TOTAL REQUEST: \$ 58,469		TOTAL AWARD: \$	
<p>**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. Intervenor's 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.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate</p>			
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR²	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Enrique Gallardo	12/9/1997	191670	No
Stephanie Chen	8/23/2010	270917	No

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

Attachment or Comment #	Description/Comment
1	Time Recording for the Greenlining Institute's Attorneys
2	Certificate of Service
3	The last Commission approved rate for Enrique Gallardo was \$390, for work done in 2013. To date, the Commission has not issued a Resolution setting intervenor rates for 2014. However, assuming that the 2014 Resolution would grant a 2% COLA, as the 2013 Resolution did, it would result in a 2014 rate of \$400 for Mr. Gallardo (when rounded to the nearest \$5 increment). Greenlining submits that this is a reasonable rate to approve for Mr. Gallardo's work in 2014.
4	The last Commission approved rate for Stephanie Chen was \$220 for work done in 2012 (D.13-10-033). Resolution ALJ-287 ordered a 2% Cost of Living Adjustment (COLA) for 2013 rates, which would set the rate for Ms. Chen's work in 2013 at \$225 (when rounded to the nearest \$5 increment). To date, the Commission has not issued a Resolution setting intervenor rates for 2014. However, assuming that the 2014 Resolution would grant a 2% COLA, as the 2013 Resolution did, it would result in a 2014 rate of \$230 for Ms. Chen. Greenlining argues that this is a reasonable rate to approve for Ms. Chen's work in 2014.

D. CPUC Disallowances and Adjustments (CPUC completes):

Item	Reason

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

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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 (see 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 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 2

Time Recording for the Greenlining Institute's Attorneys

Hours of Enrique Gallardo, Legal Counsel in 2013

Issue Areas

A. Procedural Objections

A

B. Advocacy for Moderate Interim Changes

B

C. Review of Utility & Settlement Proposals

C

D. Climate Credit Issue

D

E. General/Procedural

E

Date	Description	A	B	C	D	E	Total
10/26/13	Review Assigned Comm. Ruling Inviting Interim Rate Applications					1.2	1.2
10/30/13	Research Procedural Requirements re Findings	2.7					2.7
10/30/13	Research OIR 12-06-013, setting open discussion	1.4					1.4
11/1/13	Discussion w M. Kasnitz re ex parte strategy	0.4					0.4
11/4/13	Ex parte w Advisors to Comm. Florio	0.8					0.8
11/4/13	Draft Motion to Strike Portions of Assigned Comm. Ruling	3.1					3.1
11/5/13	Ex parte w Scott Murtishaw	0.8					0.8
11/5/13	Draft Comments on Phase 2 Schedule	2.9					2.9
11/6/13	Draft Motion to Strike Portions of Assigned Comm. Ruling	1					1
11/6/13	Draft Comments on Phase 2 Schedule	1.4					1.4
11/8/13	Draft Comments on Phase 2 Schedule	0.9					0.9
11/11/13	Rev Comments on Phase 2 Schedule of IOUs, ORA, TURN					2.9	2.9
11/13/13	Discuss Phase 2 Proposal with PG&E					1	1
11/14/13	Discuss Phase 2 Proposal with SDG&E					0.5	0.5
11/20/13	Discuss Phase 2 Proposal with SCE					0.7	0.7
12/2/13	Review Summer 2014 Rate Proposal of PG&E			3.5			3.5
12/2/13	Review Summer 2014 Rate Proposal of SCE			2.3			2.3
12/4/13	Review Summer 2014 Rate Proposal of SDG&E			3.6			3.6
12/5/13	Pre-Hearing Conference					0.5	0.5
12/5/13	Review Summer 2014 Rate Proposal of SDG&E			0.4			0.4
12/18/13	Draft Protest of PG&E, SCE, SDG&E Rate Proposals		3.1				3.1
12/20/13	Discuss Bill Impact Model with SCE					0.8	0.8
12/20/13	Draft Protest of PG&E, SCE, SDG&E Rate Proposals		1.2		1.7		2.9
12/23/13	Draft Protest of PG&E, SCE, SDG&E Rate Proposals		2.5				2.5
12/24/13	Review Protests of ORA, TURN, etc.		1.5	1.5		1.4	4.4
Issue Areas		A	B	C	D	E	Total
Total Hours for E. Gallardo in 2013		15.4	8.3	11.3	1.7	9	45.7

Revised May 2014

Hours of Enrique Gallardo, Legal Counsel in 2014

Issue Areas

- A. Procedural Objections**
- B. Advocacy for Moderate Interim Changes**
- C. Review of Utility & Settlement Proposals**
- D. Climate Credit Issue**
- E. General/Procedural**

A B C D E

Date	Description	A	B	C	D	E	Total
1/6/14	Review Reply of PG&E to Protests					0.9	0.9
1/6/14	Review Reply of SCE to Protests				0.3	1	1.3
1/6/14	Review Reply of SDG&E to Protests				0.3	1.3	1.6
1/6/14	Draft Motion for Evidentiary Hearing	1.2					1.2
1/7/14	Draft Motion for Evidentiary Hearing	2.3					2.3
1/8/14	Review Motion for Evid. Hearing of ORA, TURN, SDCAN					1.6	1.6
1/8/14	Pre-Hearing Conference		1.1			1.1	2.2
1/27/14	Review Second Amended Scoping Memo		0.4			0.4	0.8
1/30/14	Review Revised PG&E Summer 2014 Proposal		1.6	1.6			3.2
1/30/14	Review Revised SCE Summer 2014 Proposal		1.1	1.1			2.2
1/30/14	Draft Discovery Requests on PG&E, SCE				1.4		1.4
1/31/14	Review Revised SDG&E Summer 2014 Proposal		1.3	1.2			2.5
1/31/14	Draft Discovery Requests on SDG&E				0.6		0.6
2/12/14	Review bill impact data of SDG&E			1.5			1.5
2/12/14	Draft Discovery Requests on PG&E, SCE			0.8			0.8
2/14/14	Review bill impact data of SDG&E			1.7			1.7
2/18/14	Review bill impact data of SCE			2.9			2.9
2/18/14	Discuss Rate Proposal with PG&E			0.5			0.5
2/21/14	Settlement discussion re PG&E summer rates			0.9			0.9
2/21/14	Settlement discussion re SCE summer rates			0.8			0.8
2/21/14	Review bill impact data re PG&E settlement			1.3			1.3
2/21/14	Review bill impact data re SCE settlement			1.4			1.4
2/24/14	Settlement discussion re PG&E summer rates			1			1
2/28/14	Review, analyze bill impact data of settlement proposals			2.5			2.5
3/3/14	Draft Testimony on SDG&E Rate Proposal		3.3				3.3
3/3/14	Draft Testimony on SCE Rate Proposal			2.1			2.1
3/4/14	Draft Testimony on SDG&E Rate Proposal		0.9				0.9
3/4/14	Draft Testimony on SCE Rate Proposal		0.4				0.4
3/5/14	Review motion for Settlement of SCE summer rates			1.9			1.9
3/5/14	Settlement discussion re PG&E summer rates			0.8			0.8
3/6/14	Review motion for Settlement of PG&E summer rates			1.4			1.4
3/6/14	Review intervenor testimony on SDG&E rates			3.8			3.8
3/12/14	Review data re SCE, PG&E settlements			2.4			2.4
3/13/14	Review SDG&E Rebuttal testimony			2.7	0.8		3.5
3/24/14	Settlement discussion re SDG&E summer rates			1			1
3/25/14	Evidentiary Hearing			3.1			3.1
3/27/14	Research Climate Dividend				3.4		3.4
3/28/14	Review Motion for SDG&E settlement			2.8			2.8
4/1/14	Review data re PG&E, SCE settlements			2.3			2.3
4/1/14	Draft Brief re Settlement bill impacts			1.5			1.5
4/1/14	Draft Brief re Climate Credit				2.1		2.1

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4/2/14	Draft Brief re Climate Credit				3.7		3.7
4/3/14	Draft Brief re Climate Credit				2.5		2.5
4/7/14	Draft Brief re Climate Credit				2.9		2.9
4/8/14	Review briefs of IOUs, ORA, TURN			1.4	2.9		4.3
4/8/14	Draft Reply Brief				2.2		2.2
4/10/14	Draft Reply Brief				3.6		3.6
4/15/14	Draft Reply Brief				2.3		2.3
5/12/14	Review Proposed Decision			1.1	1.9		3
5/28/14	Draft Comments on Proposed Decision				0.9		0.9
Issue Areas		A	B	C	D	E	Total
Total Hours for E. Gallardo in 2014		3.5	10.1	47.5	31.8	6.3	99.2

Hours of Stephanie Chen, Energy & Telecommunications Policy Director, on Intervenor Compensation in 2014

Date	Description	Hours
8/6/2014	Preparing intervenor compensation claim	4.9
8/13/2014	Preparing intervenor compensation claim	3.5
Total		8.4