

**FILED**

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

Application of Pacific Gas and Electric Company for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2020. (U39M)	Application 18-12-009 (Filed December 13, 2018)
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**NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION  
AND, IF REQUESTED (and ☐ <sup>1</sup> checked), ADMINISTRATIVE LAW JUDGE'S  
RULING ON [INTERVENOR'S NAME]'S SHOWING OF SIGNIFICANT  
FINANCIAL HARDSHIP**

**NOTE: AFTER ELECTRONICALLY FILING A PDF COPY OF THIS NOTICE OF INTENT, PLEASE EMAIL THE DOCUMENT IN AN MS WORD FORMAT TO THE INTERVENOR COMPENSATION PROGRAM COORDINATOR AT**

**[Icompcoordinator@cpuc.ca.gov](mailto:Icompcoordinator@cpuc.ca.gov)**

<b>Customer or Eligible Local Government Entity (party intending to claim intervenor compensation):</b> L. Jan Reid		
<b>Assigned Commissioner:</b> Michael Picker		<b>Administrative Law Judges:</b> Elaine Lau and Rafael Lirag
I hereby certify that the information I have set forth in Parts I, II, III and IV of this Notice of Intent is true to my best knowledge, information and belief.		
Signature: /s/ L. Jan Reid		
Date: March 13, 2018	Printed Name:	L. Jan Reid

<sup>1</sup> DO NOT CHECK THIS BOX if a finding of significant financial hardship is not needed (in cases where there is a valid rebuttable presumption of eligibility (Part III(A)(3)) or significant financial hardship showing has been deferred to the intervenor compensation claim).

**PART I: PROCEDURAL ISSUES**  
**(To be completed by the party intending to claim intervenor compensation)**

<b>A. Status as “customer” (see Pub. Util. Code § 1802(b))<sup>2</sup></b> The party claims “customer” status because the party is (check one):	<b>Applies (check)</b>
<b>1.</b> A <b>Category 1</b> customer is an actual customer whose self-interest in the proceeding arises primarily from his/her role as a customer of the utility and, at the same time, the customer must represent the broader interests of at least some other customers. See, for example, D.08-07-019 at 5-10).	<input checked="" type="checkbox"/>
<b>2.</b> A <b>Category 2</b> customer is a representative who has been authorized by actual customers to represent them. Category 2 involves a more formal arrangement where a customer or a group of customers selects a more skilled person to represent the customer’s views in a proceeding. A customer or group of customers may also form or authorize a group to represent them, and the group, in turn, may authorize a representative such as an attorney to represent the group.	<input type="checkbox"/>
<b>3.</b> A <b>Category 3</b> customer is a formally organized group authorized, by its articles of incorporation or bylaws to represent the interests of residential customers or small commercial customers receiving bundled electric service from an electrical corporation (§1802(b)(1)(C)). Certain environmental groups that represent residential customers with concerns for the environment may also qualify as Category 3 customers, even if the above requirement is not specifically met in the articles or bylaws. See D.98-04-059, footnote at 30.	<input type="checkbox"/>
<b>Do you have any direct economic interest in outcomes of the proceeding?</b> <sup>3</sup>  If “Yes”, explain: I am a residential customer of Pacific Gas and Electric Company (PG&E). I note that this proceeding is a ratesetting proceeding. Therefore, I will be personally affected by any changes to PG&E residential electric rates.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>B. Conflict of Interest (§ 1802.3)</b>	<b>Check</b>
1. Is the customer a representative of a group representing the interests of small commercial customers who receive bundled electric service from an electrical corporation?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. If the answer to the above question is “Yes”, does the customer have a conflict arising from prior representation before the Commission?	<input type="checkbox"/> Yes <input type="checkbox"/> No

<sup>2</sup> All statutory references are to California Public Utilities Code unless indicated otherwise.

<sup>3</sup> See Rule 17.1(e).

<b>C. Status as an Eligible Local Government Entity (§§1802(d), 1802.4, 1803.1)</b>	
The party claims “eligible local government entity” status because the party is a city, county, or city and county that is not a publicly owned public utility that intervenes or participates in a Commission proceeding for the purpose of protecting the health and safety of the residents within the entity’s jurisdiction following a catastrophic material loss suffered by its residents either in significant damage to infrastructure or loss of life and property, or both, as a direct result of public utility infrastructure.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<u>The party’s explanation of its status as an eligible local government entity must include a description of</u> (1) The relevant triggering catastrophic event; (2) The impacts of the triggering catastrophic event on the residents within the entity’s jurisdiction as a result of public utility infrastructure; and (3) The entity’s reason(s) to participate in this proceeding.	
<b>D. Timely Filing of Notice of Intent to Claim Intervenor Compensation (NOI) (§ 1804(a)(1)):</b>	
1. Is the party’s NOI filed within 30 days after a Prehearing Conference? Date of Prehearing Conference: 2/11/2019	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2. Is the party’s NOI filed at another time (for example, because no Prehearing Conference was held, the proceeding will take less than 30 days, the schedule did not reasonably allow parties to identify issues within the timeframe normally permitted, or new issues have emerged)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2a. The party’s description of the reasons for filing its NOI at this other time:	
2b. The party’s information on the proceeding number, date, and decision number for any Commission decision, Commissioner ruling, Administrative Law Judge’s ruling, or other document authorizing the filing of NOI at that other time:	

**PART II: SCOPE OF ANTICIPATED PARTICIPATION**  
**(To be completed by the party intending to claim intervenor compensation)**

**A. Planned Participation (§ 1804(a)(2)(A)):**

The party's statement of the issues on which it plans to participate: Billing Impacts, Credit Ratings, Customer Service Offices, Disconnections, Meter Protection Program, PG&E Bankruptcy, PG&E's Probation with the U.S. District Court, Reasonableness of Proposed Costs, Safety Performance, and Wildfire Mitigation

The party's explanation of how it plans to avoid duplication of effort with other parties: It is difficult to avoid duplication because of the following factors: some parties refuse to discuss future positions; parties' positions are developed over time and are often not established until a few days before a filing date; and the competitive nature of litigation and intervenor compensation. Nevertheless, I will continue to collaborate with other parties during this proceeding to attempt to avoid unnecessary duplication.

The party's description of the nature and extent of the party's planned participation in this proceeding (to the extent that it is possible to describe on the date this NOI is filed).

PUC § 1804(a)(2)(A)(i) requires that an NOI include a statement of the nature and extent of the customer's planned participation. I have attended the Prehearing Conference (PHC) and filed a Protest and a PHC statement. I intend to participate further by conducting discovery, participating in workshops, filing comments and briefs, serving testimony, conducting cross-examination, and filing other necessary pleadings.

**B. The party's itemized estimate of the compensation that the party expects to request, based on the anticipated duration of the proceeding (§ 1804(a)(2)(A)):**

Item	Hours	Rate \$	Total \$	#
<b>ATTORNEY, EXPERT, AND ADVOCATE FEES</b>				
[Attorney 1]				
[Attorney 2]				
L. Jan Reid	405	\$235	\$95,175.00	
[Expert 2]				
[Advocate 1]				
[Advocate 2]				
<b>Subtotal: \$65,565.00</b>				
<b>OTHER FEES</b>				
L. Jan Reid, claim preparation time and NOI preparation time.	24.5	\$117.50	\$2,878.75	
[Person 2]				
<b>Subtotal: \$2,878.75</b>				

COSTS				
Copying, 500 pages at 10 cents/page			\$50.00	
[Item 2]				
<b>Subtotal: \$50.00</b>				
<b>TOTAL ESTIMATE: \$98,103.75</b>				
<b>Estimated Budget by Issues:</b> Pursuant to Rule 17.1, my expected budget for participating in each issue is: General costs (10% of the total); Billing Impacts (5%); Credit Ratings (5%); Customer Service Offices (5%); Disconnections (5%); Meter Protection Program (5%); PG&E Bankruptcy (10%); PG&E's Probation with the U.S. District Court (5%); Reasonableness of Proposed Costs (20%); Safety Performance (20%); and Wildfire Mitigation (10%). I will provide time records, expense records, and justification for hourly rates in a request for an award of compensation, if I eventually file one.				
<i>When entering items, type over bracketed text; add additional rows to table as necessary. Estimate may (but does not need to) include estimated Claim preparation time. Claim preparation time is typically compensated at ½ professional hourly rate.</i>				

**PART III: SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP**  
**(To be completed by party intending to claim intervenor compensation;**  
**see Instructions for options for providing this information)**

<b>A. The party claims that participation or intervention in this proceeding without an award of fees or costs imposes a significant financial hardship, on the following basis:</b>	<b>Applies (check)</b>
1. The customer cannot afford, without undue hardship, to pay the costs of effective participation, including advocate's fees, expert witness fees, and other reasonable costs of participation. (§ 1802(h))	<input checked="" type="checkbox"/>
2. In the case of a group or organization, the economic interest of the Individual members of the group or organization is small in comparison to the costs of effective participation in the proceeding. (§ 1802(h))	<input type="checkbox"/>
3. The eligible local government entities' participation or intervention without an award of fees or costs imposes a significant financial hardship. (§ 1803.1(b).)	<input type="checkbox"/>
4. A § 1802(h) or § 1803.1(b) finding of significant financial hardship in another proceeding, made within one year prior to the commencement of this proceeding, created a rebuttable presumption in this proceeding (§ 1804(b)(1)).	<input checked="" type="checkbox"/>
Commission's finding of significant financial hardship made in proceeding number: D.18-09-043, slip op. at 2-3	
Date of Administrative Law Judge's Ruling (or CPUC Decision) in which the finding of significant financial hardship was made: September 27, 2018.	

<b>B. The party's explanation of the factual basis for its claim of "significant financial hardship" (§ 1802(h) or § 1803.1(b)) (necessary documentation, if warranted, is attached to the NOI:</b>

**PART IV: ATTACHMENTS DOCUMENTING SPECIFIC  
ASSERTIONS MADE IN THIS NOTICE**

(The party intending to claim intervenor compensation identifies and attaches documents;  
add rows as necessary)

Attachment No.	Description
1	Certificate of Service

**ADMINISTRATIVE LAW JUDGE RULING<sup>4</sup>**  
(Administrative Law Judge completes)

	Check all that apply
<b>1. The Notice of Intent (NOI) is rejected for the following reasons:</b>	<input type="checkbox"/>
a. The NOI has not demonstrated the party's status as a "customer" or an "eligible local government entity" for the following reason(s):	<input type="checkbox"/>
b. The NOI has not demonstrated that the NOI was timely filed (Part I(B)) for the following reason(s):	<input type="checkbox"/>
c. The NOI has not adequately described the scope of anticipated participation (Part II, above) for the following reason(s):	<input type="checkbox"/>
2. The NOI has demonstrated significant financial hardship for the reasons set forth in Part III of the NOI (above).	<input type="checkbox"/>
3. The NOI has not demonstrated significant financial hardship for the following reason(s):	<input type="checkbox"/>
<b>4. The Administrative Law Judge provides the following additional guidance (see § 1804(b)(2)):</b>	<input type="checkbox"/>

<sup>4</sup> A Ruling needs not be issued unless: (a) the NOI is deficient; (b) the Administrative Law Judge desires to address specific issues raised by the NOI (to point out similar positions, areas of potential duplication in showings, unrealistic expectations for compensation, or other matters that may affect the customer or eligible local government entity's Intervenor Compensation Claim); or (c) the NOI has included a claim of "significant financial hardship" that requires a finding under § 1802(h).

**IT IS RULED** that:

1. The Notice of Intent is rejected.	<input type="checkbox"/>
2. The customer or eligible local government entity has satisfied the eligibility requirements of Pub. Util. Code § 1804(a).	<input type="checkbox"/>
3. The customer or eligible local government entity has shown significant financial hardship.	<input type="checkbox"/>
4. The customer or eligible local government entity is preliminarily determined to be eligible for intervenor compensation in this proceeding. However, a finding of significant financial hardship in no way ensures compensation.	<input type="checkbox"/>
5. Additional guidance is provided to the customer or eligible local government entity as set forth above.	<input type="checkbox"/>

Dated \_\_\_\_\_, at San Francisco, California.

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Administrative Law Judge