

Decision 20-01-014 January 16, 2020

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, 2017. (U39M)	Application 15-09-001 (Filed September 1, 2015)
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**DECISION GRANTING INTERVENOR COMPENSATION TO
THE ALLIANCE FOR NUCLEAR RESPONSIBILITY
FOR SUBSTANTIAL CONTRIBUTION TO DECISION 17-05-013**

Intervenor: Alliance for Nuclear Responsibility	For contribution to Decision (D.) 17-05-013
Claimed: \$613,569.32	Awarded: \$332,448.96 (reduced by 46%)
Assigned Commissioner: Marybel Batjer	Assigned ALJ: ALJ Division¹

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	Decision 17-05-013 authorizes Pacific Gas and Electric Company ("PG&E") to increase rates based upon the adopted general rate case revenue requirements for the period January 1, 2017, through December 31, 2019. The adopted general rate case revenue requirements are based, in large part, on a comprehensive settlement entered into by PG&E, A4NR and most of the active parties to the proceeding. In addition, Decision 17-05-013 denies the recommendation of PG&E and the Office of Ratepayer Advocates for the adoption of a general rate case revenue requirement for an additional year, January 1, 2020, through December 31, 2020; that recommendation would have delayed PG&E's next general rate case filing by one year.
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¹ ALJ Roscow retired from the Commission in December 2019.

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:	October 29, 2015	Verified
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	November 16, 2015	Verified
4. Was the NOI timely filed?		Yes
Showing of eligible customer status (§ 1802(b) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	A.14-12-007	Verified
6. Date of ALJ ruling:	August 4, 2015	Verified
7. Based on another CPUC determination (specify):	N/A	
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
Showing of “significant financial hardship” (§1802(h) or §1803.1(b))		
9. Based on ALJ ruling issued in proceeding number:	A.14-12-007	Verified
10. Date of ALJ ruling:	August 4, 2015	Verified
11. Based on another CPUC determination (specify):	N/A	
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.17-05-013	Verified
14. Date of issuance of Final Order or Decision:	May 11, 2017	May 18, 2017
15. File date of compensation request:	July 7, 2017	July 10, 2017
16. Was the request for compensation timely?		Yes

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

#	Intervenor's Comment(s)	CPUC Discussion
6.	The ALJ Ruling re A4NR's Showing of Significant Financial Hardship of August 4, 2015, directed A4NR to file an amendment to its original Notice of Intent to Claim Intervenor Compensation, such amendment to provide current copies of both complete bylaws and articles of incorporation within fifteen days of the Ruling. A4NR filed the amendment complying with the terms of the Ruling on August 13, 2015.	Verified
10.	The ALJ Ruling re A4NR's Showing of Significant Financial Hardship of August 4, 2015, directed A4NR to file an amendment to its original Notice of Intent to Claim Intervenor Compensation, such amendment to provide current copies of both complete bylaws and articles of incorporation within fifteen days of the Ruling. A4NR filed the amendment complying with the terms of the Ruling on August 13, 2015.	Verified

PART II: SUBSTANTIAL CONTRIBUTION**A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059).**

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
1. A4NR recommended that revenue requirement related to the operation of the Diablo Canyon Nuclear Power Plant ("DCNPP") be removed from base rates and recovered through a performance-based ratemaking schedule	See Exhibit A4NR-2, at Section A, pp.5 to 19, and Exhibit A4NR-3, Volume 1 (workpapers of John Geesman); recommendation addressed in <i>Joint Motion for Adoption of Settlement Agreement</i> , August 3, 2016, at pp.37, 39 (A4NR withdraws recommendation upon PG&E agreement to cease	The Commission finds that this contribution claimed by A4NR did not make a substantial contribution to D.17-05-013. Therefore, we award no compensation to A4NR on this issue. As defined in Public Utilities Code Section 1802(j), "substantial contribution" means that, in the judgment of the Commission, the customer's presentation has substantially assisted the commission in the making of its

<p>in order to enforce the Commission's policies related to the safety of utility operations and address the deficiencies found in PG&E's showing regarding the reasonableness of PG&E's safety-based budgets and projects for DCNPP, including the hazards and risks associated with the potential operation of DCNPP as a load-following resource rather than as a baseload resource.</p>	<p>efforts to extend DCNPP operating licenses (see <i>Joint Motion</i> at p.4), subject to the proviso that, if the Commission does not approve DCNPP's retirement, A4NR may request reopening of GRC through appropriate procedural means to address deficiencies in risk analyses and safety programs through performance-based ratemaking); and, <i>Settlement Agreement</i>, at Section 3.2.3.1.5.</p> <p>PG&E-A4NR agreement approved by D.17-05-013, at pp.153, 155, 158 (approval of Energy Supply line of business provisions, including DCNPP-related provisions of <i>Settlement Agreement</i>), 200 (approval of <i>Settlement Agreement</i> subject to four exceptions (exceptions are unrelated to A4NR's recommendation)), and 246 (Ordering Paragraph 1 approving settlement agreement subject to four exceptions (exceptions are unrelated to A4NR's recommendation)).</p> <p>See also, D.16-01-033 re the transfer of hours and expenses associated with</p>	<p>order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer. A4NR is correct that the Settlement Agreement includes Section 3.2.3.1.5, which states: "<i>A4NR withdraws its recommendations proposing a new Schedule DC balancing account ...</i>"²</p> <p>However, this must be considered in the context of the Joint Motion, which explains that "<i>PG&E's decision under the Joint Proposal not to seek license renewal for Diablo Canyon resolves a number of issues raised by TURN and A4NR.</i>" We agree with A4NR that PG&E's actions in a different proceeding effectively resolved this issue in this proceeding: unlike other Diablo-related GRC issues that were settled and that we address below, A4NR's withdrawal of this recommendation simply reflects the reality that with the planned closure of Diablo there was no longer any need for the Commission to decide whether to adopt A4NR's performance-based ratemaking proposal. Thus, inclusion of this agreement in the Settlement did not contribute to the Commission's decision in this proceeding, because D.17-05-013 did not implicitly "decide" how to resolve this proposal by A4NR. This contrasts with other Diablo-</p>
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² The remainder of Section 3.2.3.1.5 concludes "... provided that the withdrawal of A4NR's recommendations for a new Schedule DC balancing account shall be without prejudice to A4NR's raising the recommendation in any and all such Commission proceedings as A4NR may deem necessary and proper in the event the Joint Proposal fails to be approved by the Commission for any reason."

	<p>A4NR’s participation in R.14-02-001 to this proceeding with respect to issues arising from PG&E’s proposal to use DCNPP as a load-following resource.</p>	<p>related settled issues, where by adopting the Settlement the Commission implicitly directs PG&E to take a substantive action that it would not have taken, but for its agreement to do so as part of the Settlement (e.g., for Issue 2 below, PG&E is no longer requesting preapproval of the Unit 2 main generator stator replacement; for Issue 4 below, PG&E will continue to record costs in the seismic studies balancing account; and for Issue 5 below, PG&E agreed to provide the Commission with a new study, coordinated with the Energy Commission, regarding the Independent Spend Fuel Storage Installation project). In Section III.A.a.1. of claim A4NR states <i>“A4NR is informed and believes this recommendation resulted in the timing and substance of PG&E’s announcement to retire DCNPP at the end of DCNPP’s current license period.”</i>³ This statement provides no factual basis for awarding compensation to A4NR. The timing of events also undermines A4NR’s assertion that this recommendation “resulted” in the timing and substance of PG&E’s announcement. A4NR made this recommendation in its April 29, 2016 testimony, and PG&E served rebuttal testimony on May 24, 2016. Less than a month later, on June 20, 2016 PG&E notified the Commission of the upcoming Joint Proposal regarding Diablo license renewal. The Commission cannot reasonably find that A4NR’s GRC proposals “resulted” in PG&E</p>
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³ See below, Part III.A.a.1, “General Claim of Reasonableness (§ 1801 and § 1806), Intervenor’s claim of cost reasonableness – Substantial Contributions to the Outcomes of this Proceeding.”

		<p>deciding to close Diablo and negotiating` the Joint Proposal within the 2-month period between April and June 2016.</p> <p>A4NR further asserts in Section III.A.a.1. of this claim “[t]hus, PG&E’s customers may yet benefit from the realignment of financial risks associated with DCNPP-related safety and reliability failures, and the Commission has been provided with an awareness of the regulatory tools that can be applied to enforce its safety-related policies for this and other utility facilities.” Here again, the possibility of some unspecified future benefit does not provide the basis for compensation to A4NR.</p> <p>Therefore, the inclusion of this item in the Settlement Agreement did not result in a substantial contribution to D.17-05-013. It would not be reasonable to compensate A4NR for the time it claims for this matter.</p>
<p>2. A4NR recommended that the Commission exclude the costs of PG&E’s proposed project to replace the DCNPP Unit 2 main generator stator from 2019 revenue requirement on the grounds that (a) the costs of the project were not accurately reflected in PG&E’s proposed revenue requirement, and (b) the project was inconsistent with PG&E’s ratemaking assumption, applied</p>	<p>See Exhibit A4NR-2, at Section B, pp. 19 to 23, and Exhibit A4NR-3, Volume 1 (workpapers of John Geesman and Richard Wolfe); recommendation addressed in <i>Joint Motion for Adoption of Settlement Agreement</i>, August 3, 2016, at pp.37, 38 (PG&E stipulation to withdraw request for preapproval of stator replacement project, subject to prudence review in next PG&E general rate case and subject further to A4NR’s reservation of rights to contest need for and</p>	<p>Verified.</p> <p>The Commission finds a substantial contribution because the testimony of A4NR (and TURN, independently) directly addressed a capital project proposed by PG&E in this proceeding. Furthermore, the terms of the Settlement Agreement commit PG&E to submit the same project for review in a future GRC proceeding, in the event PG&E later decides to proceed with the project.</p> <p>A4NR’s timesheets show a total of 206.61 hours spent on this matter, including 0.32 hours transferred from R.14-02-001. After removing those pre-GRC hours, we approve the remaining hours.</p>

<p>to other DCNPP costs, that the plant would cease to operate in 2024-2025.</p>	<p>reasonableness of the project and its costs if PG&E proceeds with the project); and, <i>Settlement Agreement</i>, at Section 3.2.3.1.2.</p> <p>PG&E-A4NR agreement approved by D.17-05-013, at pp.153, 154, 158 (approval of Energy Supply line of business provisions, including DCNPP-related provisions of <i>Settlement Agreement</i>), 200 (approval of settlement agreement subject to four exceptions (exceptions are unrelated to A4NR’s recommendation)), and 246 (Ordering Paragraph 1 approving settlement agreement subject to four exceptions (exceptions are unrelated to A4NR’s recommendation)).</p> <p>See also, D.16-01-033 re the transfer of hours and expenses associated with A4NR’s participation in R.14-02-001 to this proceeding with respect to issues arising from PG&E’s proposal to use DCNPP as a load-following resource.</p>	<p>We also address A4NR’s reliance on D.16-01-033 in R.14-02-001 to support portions of its compensation claim.</p> <p>We find that A4NR’s transfer of those hours to its claim in this proceeding is contrary to the Commission’s direction in D.16-01-033. That decision ordered that “If another proceeding assumes Track 1 or Track 2 issues, work performed by an intervenor in Rulemaking 14-02-001 may be considered for intervenor compensation in such other proceeding.”⁴</p> <p>R.14-02-001 was the Commission’s “Rulemaking to Consider Electric Procurement Policy Refinements pursuant to the Joint Reliability Plan.” Track 1 of R.14-02-001 pertained to two- and/or three-year forward-looking Resource Adequacy procurement requirements. Track 2 of R.14-02-001 pertained to implementation of a long-term joint reliability planning assessment with the CAISO and CEC.</p> <p>The Scoping Memo of this PG&E GRC did not include the Track 1 or Track 2 issues from R.14-02-001 listed above. Therefore, those “pre-GRC” hours claimed by A4NR in this proceeding do not warrant compensation.⁵</p>
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⁴ D.16-01-033, Ordering Paragraph 3.

⁵ A4NR’s timesheets indicate that A4NR’s compensation claim includes transfer of hours from R.14-02-001 for most of the issues addressed by A4NR in this proceeding. We have removed these hours from A4NR’s claim in two ways: first, if we deny all compensation to A4NR on a specific issue, that effectively removes the pre-GRC hours. Second, for issues where we do award compensation to A4NR, we modify A4NR’s calculation of its requested award by deleting the pre-GRC hours from our own calculation.

<p>3. A4NR recommended that the Commission adjust annual depreciation expense related to PG&E’s remaining investment in DCNPP-related assets so as to be consistent with PG&E’s internal analyses and policies related to the remaining useful life of those assets.</p>	<p>See Exhibit A4NR-2, at Section C, pp.23 to 34, and Exhibit A4NR-3, Volume 1 (workpapers of John Geesman and Richard Wolfe); recommendation addressed in <i>Joint Motion for Adoption of Settlement Agreement</i>, August 3, 2016, at pp.37 to 38 (agreement by PG&E that PG&E will cease efforts to extend DCNPP operating licenses (see <i>Joint Motion</i> at p.4) and reconciles PG&E and A4NR positions re annual depreciation expense, subject to reservation of rights by A4NR to reopen GRC by appropriate procedural filing if the Commission rejects PG&E request to retire DCNPP per A.16-08-006); and, <i>Settlement Agreement</i>, at Section 3.2.3.1.1.</p> <p>PG&E-A4NR agreement approved by D.17-05-013, at pp.107, 153, 158 (approval of Energy Supply line of business provisions, including DCNPP-related provisions of <i>Settlement Agreement</i>), 200 (approval of <i>Settlement Agreement</i> subject to four exceptions</p>	<p>The Commission finds that the contribution claimed by A4NR did not make a substantial contribution to D.17-05-013. Therefore, we award no compensation to A4NR on this issue.</p> <p>In its testimony, A4NR noted that the then-current depreciation schedule for Diablo Canyon assumed that the plant would cease operations when its NRC operating license expired in 2024. A4NR proposed that the depreciation schedule should be extended assuming that Diablo Canyon will operate into 2044.</p> <p>A4NR is correct that the Settlement Agreement includes Section 3.2.3.1.1 which states: “A4NR withdraws its recommendations with respect to decreasing annual depreciation expense for remaining Diablo Canyon net investment ...”⁶</p> <p>However, like A4NR’s first issue addressed above, this is another instance where A4NR’s withdrawal of this recommendation simply reflects the reality that with the planned closure of Diablo there was no longer any need for the Commission to decide whether to adopt A4NR’s performance-based ratemaking proposal.</p> <p>Therefore, we apply the same analysis as we applied to A4NR’s first issue, and conclude that the inclusion of this item in the Settlement Agreement did not result in a substantial contribution to</p>
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⁶ The remainder of Section 3.2.3.1.1 concludes “... without prejudice to A4NR’s raising the issue in any and all such Commission proceedings as A4NR may deem necessary and proper in the event the Joint Proposal on Diablo Canyon fails to be approved by the Commission and PG&E elects to proceed with license renewal for Diablo Canyon.”

	(exceptions are unrelated to A4NR's recommendation)), and 246 (Ordering Paragraph 1 approving <i>Settlement Agreement</i> subject to four exceptions (exceptions are unrelated to A4NR's recommendation)).	D.17-05-013. It would not be reasonable to compensate A4NR for the time it claims for this matter.
4. A4NR recommended the Commission reject PG&E's proposal to terminate the DCNPP seismic studies balancing account so as to preserve the Commission's access to the seismic studies and facilitate the review of the financial impacts of continuing DCNPP operations in the event the studies revealed the need for seismic upgrades or new safety-related projects or programs.	<p>See Exhibit A4NR-2, at Section D, pp.35 to 37; recommendation included in <i>Joint Motion for Adoption of Settlement Agreement</i>, August 3, 2016, at pp.15, 29 (reducing base rate revenue requirement by \$4.17 million and removing costs of DCNPP seismic studies to ERRA proceedings subject to review of studies and reasonableness of study costs); and, <i>Settlement Agreement</i>, at Section 3.1.4, p.1-7, Section 3.1.10.1, at p.1-15, and Appendix A, p.5 of 18, line 87.</p> <p>PG&E-A4NR agreement approved by D.17-05-013, at pp.79, 118 to 119, 200 (approval of <i>Settlement Agreement</i> subject to exceptions unrelated to A4NR's recommendation), and 246 (Ordering Paragraph 1 approving <i>Settlement Agreement</i> subject to four exceptions (exceptions are unrelated to A4NR's recommendation)).</p>	<p>Verified.</p> <p>The Commission finds a substantial contribution because A4NR's filed testimony opposed PG&E's proposal to close the Diablo Canyon Seismic Studies Balancing Account. Section 3.1.4 (Energy Supply) of the Settlement Agreement adopts A4NR's recommendation to continue the use of this account. As a result, the 2017 revenue requirement in the Settlement Agreement included a reduction of PG&E's original forecast for Energy Supply expense by \$4.2 million for seismic studies at Diablo Canyon. In conjunction with that reduction PG&E agreed to record its annual costs of seismic studies in the Diablo Canyon Seismic Studies Balancing Account for review and recovery through the Energy Resource Recovery Account filings. PG&E also stipulated to the withdrawal of its proposal to retire the Diablo Canyon Seismic Studies Balancing Account.</p> <p>A4NR's timesheets show a total of 119.955 hours spent on this matter, including 4.13 hours transferred from R.14-02-001. After removing those pre-GRC hours, we approve the remaining hours.</p>

<p>5. A4NR recommended the Commission omit the costs of the DCNPP Independent Spent Fuel Storage Installation expansion project from rates until such time as PG&E demonstrated its full compliance with the recommendations of the California Energy Commission regarding the transfer of spent fuel assemblies to dry cask storage, compliance with such recommendations having been adopted by this Commission as a condition precedent to cost recovery of the project.</p>	<p>See Exhibit A4NR-2, at Section E, pp.37 to 39, and Exhibit A4NR-3, Volumes 4 and 5 (workpapers of John Geesman); recommendation addressed by <i>Joint Motion for Adoption of Settlement Agreement</i>, August 3, 2016, at pp.37, 38 (A4NR agrees to withdraw recommendation, and PG&E agrees to conduct and provide the Commission with a study for expediting the transfer of spent fuel assemblies as part of DCNPP decommissioning study, such study to be coordinated with the Energy Commission per prior <i>Integrated Energy Policy Reports</i>); and, <i>Settlement Agreement</i>, at Section 3.2.3.1.3.</p> <p>PG&E-A4NR agreements approved by D.17-05-013, at pp.155, 158 (approval of Energy Supply line of business provisions, including DCNPP-related provisions of <i>Settlement Agreement</i>), (approval of <i>Settlement Agreement</i> subject to exceptions (exceptions are unrelated to A4NR's recommendation)), and</p>	<p>Verified.</p> <p>The Commission finds a substantial contribution because the Settlement Agreement includes a compromise between A4NR and PG&E. Section 3.2.3.1.3 states: "A4NR withdraws its ratemaking recommendations with respect to the Diablo Canyon Independent Spent Fuel Storage Installation expansion project, provided that PG&E conducts a study, as part of its detailed Diablo Canyon site specific decommissioning study specified in Section 5.4.1 of the Joint Proposal, of the options for post shut-down expedited transfer of spent nuclear fuel to dry cask storage, coordinates such studies with the California Energy Commission (CEC), and evaluates the CEC's recommendations and input in good faith."⁷</p> <p>A4NR's timesheets show a total of 184.370 hours spent on this matter, including 1.12 hours transferred from R.14-02-001. After removing those pre-GRC hours, we approve the remaining hours.</p>
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⁷ The remainder of Section 3.2.3.1.3 states "Nothing in this stipulation shall waive any right of A4NR to contest the reasonableness of PG&E's costs of interim spent fuel handling, transfer or storage in the event, if, in A4NR's sole judgment, PG&E has failed to conduct the studies or coordinate the studies with the CEC in a manner consistent with the terms of this agreement and the Joint Proposal."

	246 (Ordering Paragraph 1 approving <i>Settlement Agreement</i> subject to four exceptions (exceptions are unrelated to A4NR’s recommendation)).	
6. A4NR recommended that PG&E be required to file an annual Tier 1 advice letter providing specifically enumerated, material information to the Commission and the public bearing on PG&E’s plans to extend the licenses and authorities for DCNPP beyond 2024 and 2025.	<p>See Exhibit A4NR-1, and Exhibit A4NR-3, Volume 2 (workpapers of Rochelle Becker); recommendation addressed by <i>Joint Motion for Adoption of Settlement Agreement</i>, August 3, 2016, at pp.37, 39 (PG&E agrees to submit information annually, addressing material changes to DCNPP condition that might affect retirement date and updating planned capital improvements, projects and additions as retirement approaches); and, <i>Settlement Agreement</i>, at Section 3.2.3.1.4.</p> <p>PG&E-A4NR agreement approved by D.17-05-013, at pp.153, 155, 158 (approval of Energy Supply line of business provisions, including DCNPP-related provisions of <i>Settlement Agreement</i>), 200 (approval of <i>Settlement Agreement</i> subject to four exceptions (exceptions are unrelated to A4NR’s recommendation)), and</p>	<p>The Commission finds that the contribution claimed by A4NR did not make a substantial contribution to D.17-05-013. Therefore, we award no compensation to A4NR on this issue.</p> <p>In testimony, A4NR proposed that the Commission require PG&E to file a report, as a Tier 1 advice letter, “disclosing material information relevant to PG&E’s activities related to extending the operating life” of Diablo Canyon.⁸ PG&E opposed this proposal in its rebuttal testimony, arguing that this issue is not within the scope of the GRC and, regardless, some of the items on A4NR’s list had already been identified in a recent letter from President Picker for inclusion in PG&E’s then-expected application for recovery of license renewal costs. PG&E also asserted that several items on A4NR’s list were subject to the exclusive jurisdiction of the NRC, and that other items were “highly confidential and proprietary Institute of Nuclear Power Operations (INPO) evaluations, which would cause PG&E to violate its membership agreement with INPO.”⁹</p> <p>A4NR is correct that the Settlement Agreement includes Section</p>

⁸ Exhibit A4NR-1 at 4.

⁹ Exhibit PGE-24 at page 3-11.

	<p>246 (Ordering Paragraph 1 approving <i>Settlement Agreement</i> subject to four exceptions (exceptions are unrelated to A4NR’s recommendation)).</p>	<p>3.2.3.1.4 which states: “(A) A4NR withdraws its recommendation that the Commission order PG&E to file an annual Tier 1 advice letter regarding the material conditions affecting PG&E’s decision to pursue the NRC license extensions for Diablo Canyon...”¹⁰</p> <p>and</p> <p>“(B) In lieu of the annual advice letter recommended by A4NR, PG&E shall notify the Commission via a Tier 1 advice letter of any material changes to the condition of the plant as may affect the planned retirement date of Diablo Canyon...” and “PG&E shall also provide an annual update to its Test Year 2017 General Rate Case forecast of the planned capital improvements, projects and additions for Diablo Canyon as part of its implementation of the Joint Proposal...”¹¹</p> <p>Neither (A) nor (B) above can reasonably be found to be substantial contributions to D.17-05-013. The timing here is important: on August 3, 2017 A4NR agreed to withdraw its request for a lengthy list of <u>controversial</u> requests for information about <u>license renewal</u>, in exchange for a commitment by PG&E to provide <u>general</u> update</p>
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¹⁰ The remainder of Section 3.2.3.1.4 (A) concludes “...provided that the withdrawal of A4NR’s recommendation shall be without prejudice to A4NR’s raising the proposal for such an advice letter in any and all such Commission proceedings as A4NR may deem necessary and proper in the event the Joint Proposal fails to be approved by the Commission for any reason.”

¹¹ The remainder of Section 3.2.3.1.4 (B) concludes “...provided that PG&E’s stipulation to file such an annual advice letter shall be without effect in the event the Joint Proposal fails to be approved by the Commission for any reason. PG&E shall also provide an annual update to its Test Year 2017 General Rate Case forecast of the planned capital improvements, projects and additions for Diablo Canyon as part of its implementation of the Joint Proposal, should the Joint Proposal be approved by the Commission.”

		<p>information that it <u>would provide to the Commission in any case</u>, all with the full knowledge that PG&E would in just a few days file its application seeking to close Diablo Canyon. A4NR states in this claim that “A4NR and PG&E agreed to conform the annual filing recommended by A4NR to information relevant to DCNPP’s operation under an assumption that the plant will be retired in 2024-2025 and, based upon this agreement, PG&E will file information annually bearing on DCNPP’s condition bearing on DCNPP’s retirement date and operations” but the language in the Settlement Agreement says no such thing.</p> <p>For these reasons, it would not be reasonable to compensate A4NR for the time it claims for this matter.</p>
<p>7. A4NR recommended the Commission reject the ORA-PG&E proposal to add a third post-test year revenue requirement to the rate relief granted in this application on the grounds that the cumulative impact of a four-year rate case cycle was unreasonable in comparison to the settlement results proposed for the test year and would create undue burdens for the</p>	<p>See <i>Opening Comments on Settlement Agreement of A4NR</i>, August 18, 2016, at pp.9 to 12; also, <i>Reply Comments of A4NR re the Proposed Decision of ALJ Roscow</i>, March 27, 2017, pp.1 to 5.</p> <p>A4NR position prevails per D.17-05-013, at pp.52, 229 to 230 (rejecting the ORA-PG&E proposal for a third post-test year revenue requirement, and citing A4NR’s assertions, based upon A4NR’s review of the evidentiary record demonstrating that there was no evidence sufficient to support</p>	<p>Verified.</p>

<p>review of DCNPP costs in the next PG&E general rate case. A4NR also asserted that ORA's proposed revenue requirement for the third post-test year was not supported by the record.</p> <p>The Commission rejected the ORA-PG&E proposal for a third post-test year.</p>	<p>findings of fact re the reasonableness of the ORA-PG&E proposed third post-test year revenue requirement).</p>	
<p>8. A4NR recommended the Commission limit any motion seeking further relief under Rule 12.4(c) to matters in the <i>Settlement Agreement</i> that were rejected by the Commission's final decision.</p> <p>The Commission agreed with A4NR's proposed clarification, over the objection of PG&E, and limited the scope of any motion requesting further relief to the four matters in the <i>Settlement Agreement</i> modified by D.17-05-013.</p>	<p>See <i>Opening Comments of A4NR on Proposed Decision of ALJ Roscow</i>, March 20, 2017, at pp.ii to iii, and 6 to 8.</p> <p>A4NR clarification adopted in D.17-05-013, at page 223; Ordering Paragraph 3, at page 247 (see especially footnote 260 on page 247), providing that motions requesting further relief are limited to addressing the four modifications to the <i>Settlement Agreement</i> adopted by the Commission and no other provisions and rejecting PG&E's opposition to A4NR's position re limitations placed on motions requesting further relief.</p>	<p>Verified.</p>

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

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office at the California Public Utilities Commission (Cal Advocates) a party to the proceeding? ¹²	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: The Utility Reform Network ("TURN"), Collaborative Approaches to Utility Safety Enforcement ("CAUSE"), Consumer Federation of California		Verified
d. Intervenor's claim of non-duplication: i. Diablo Canyon Issues: A4NR's participation in this proceeding focused upon addressing the reasonableness of PG&E's proposed Test Year 2017 revenue requirement related to the operation of the Diablo Canyon Nuclear Power Plant ("DCNPP"). In particular, A4NR sought to adjust the balance of safety, reliability, operating, and financial risks associated with the PG&E's nuclear operations so as to increase the level of these risks borne by the company and concomitantly reduce the level of these risks assigned under current regulatory practices to PG&E's customers. This strategy was directed towards achieving Commission orders that would be a "forcing event," thereby causing PG&E to make a definitive (and long deferred) decision regarding whether the company would continue to seek the extension of DCNPP's reactor operating licenses. Under A4NR's DCNPP-related proposals, the Commission would be apprised as to all material conditions affecting PG&E's decision regarding whether to continue to seek the extension of DCNPP's current operating licenses and, in the event PG&E continued to pursue those license extensions, DCNPP would be subject to a different regulatory scheme, pursuant to which a greater share of the safety, reliability and operating risks, and relevant financial risks, associated with operating the aging units would be assigned to the company.		Noted

¹² The Office of Ratepayer Advocates (ORA) was renamed the Public Advocate's Office at the California Public Utilities Commission (Cal PA), pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

<p>A4NR is informed and believes its strategy and recommendations contributed to both the substance and timing of PG&E's announcement (noted in D.17-05-013, at pp. 13, 153) that PG&E would retire DCNPP at the end of its current license period. PG&E's decision resulted in the adoption of settlement provisions addressing all of A4NR's recommendations, which in one form or another (including the reservation of rights to resurrect several of them in the event PG&E or the Commission reverse the decision to retire DCNPP) were reflected in the <i>Settlement Agreement</i> which was adopted by the Commission in D.17-05-013 (approving the agreement subject to four exceptions, none of which are relevant to A4NR's recommendations or the settlement provisions addressing those recommendations).</p> <p>In very large part, A4NR's six specific DCNPP-related recommendations affecting PG&E's electric rates and regulatory-reporting requirements were unique and not raised by any other party. ORA reviewed, but did not contest, any aspect of PG&E's DCNPP-related revenue requirement (with one minor exception not related to any of A4NR's recommendations). TURN was the only other party presenting issues related to DCNPP revenue requirements and in only one instance did TURN's participation address an issue addressed by A4NR's recommendations: both A4NR and TURN sought to exclude the costs of PG&E's proposed DCNPP Unit 2 main generator stator replacement project from electric rates. A4NR's position was based on separate and distinct grounds from those asserted by TURN. A4NR proposed that the project be rejected on the grounds that the project (a) was justified internally as being necessary to support DCNPP's operations beyond the period of the plant's existing operating licenses, a justification that (b) was inconsistent with other PG&E ratemaking assumptions that DCNPP would cease to operate upon the expiration of those licenses in 2024-2025, while TURN's position was that the Commission should defer ruling on the prudence of the project until PG&E's next general rate case, and then only upon a showing adequate to support the prudence of the project. These positions combined to result in PG&E's withdrawal of its request for approval of the project, with any Commission approval deferred pending PG&E's reconsideration of whether to proceed with the project.</p> <p>In addition to the effort A4NR made to coordinate with ORA and TURN, A4NR also conducted early discussions with the Friends of the Earth and the San Luis Obispo Mothers for Peace to determine whether those parties might raise issues overlapping</p>	
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<p>with A4NR’s planned participation. It was determined through these discussions that A4NR’s recommendations related to DCNPP-related revenue requirement were unique and would not overlap with the interests of those parties.</p> <p>The lack of duplication on DCNPP-related issues was the direct result of efforts A4NR initiated early in this proceeding in order to coordinate with ORA and TURN analyses and legal theories to the extent those parties might address DCNPP operations and regulatory oversight. After developing an initial set of potential DCNPP-related ratemaking and reporting recommendations, A4NR shared a preliminary outline of its factual and policy positions with ORA and TURN in November 2015 in an effort to reveal, and then limit, any areas where there might be potential duplication of effort, findings and recommendations. Based upon these discussions, A4NR developed its final factual findings and policy recommendations and once again shared substantially complete drafts of its direct testimony with both ORA and TURN five weeks prior to serving that testimony on the parties to this proceeding. This early sharing and collaboration resulted in TURN and A4NR proposing distinct grounds for rejecting the DCNPP Unit 2 main generator stator replacement project and avoiding any duplication of effort as to the other five DCNPP-related recommendations proposed by A4NR.</p> <p>ii. Non-DCNPP Issues: Rate Case Periodicity and Procedural Matters</p> <p>As to other non-DCNPP topics addressed in D.17-05-013, A4NR joined TURN, CAUSE and CFC in opposing the adoption of a third post-test year revenue requirement proposed by ORA and supported by PG&E. A4NR also joined with the other settling parties in supporting the adoption of the entirety of the <i>Settlement Agreement</i> as executed by the settling parties without modification – this issue arose from the <i>Proposed Decision</i> which adopted the <i>Settlement Agreement</i>, subject to four modifications. Here, A4NR departed from the position of the majority of the settling parties by proposing that, in the event any party contested the four modifications by filing a motion requesting further relief, any such motion should be limited to addressing the four modifications and none of the other provisions of the <i>Settlement Agreement</i>.</p> <p>With respect to ORA’s proposed third post-test year revenue requirement, A4NR joined TURN, CAUSE and CFC in opposing the proposal. Prior to submitting argument on this issue in its <i>Opening Comments on the Settlement Agreement</i>, A4NR conferred with TURN and CAUSE regarding the separate</p>	
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grounds upon which A4NR might assert in opposition to the ORA-PG&E recommendation. Based upon the understandings developed through these collaborative efforts, A4NR limited its argument to the cumulative effects that the adoption of a third post-test year attrition allowance would have on PG&E's rates and the undue burdens the ORA-PG&E proposal would have on the review of DCNPP-related revenue requirement in the next PG&E general rate case. Following the issuance of the *Proposed Decision of ALJ Roscow* and its proposed rejection of the ORA-PG&E recommendation, A4NR drafted reply comments in response to the opening comments of ORA and PG&E which sought to reverse the *Proposed Decision* on this holding. The arguments drafted by A4NR highlighted the inconsistencies between the ORA-PG&E recommendation and the record evidence regarding the reasonableness of the proposed revenue requirement; A4NR shared its draft reply comments with TURN, which allowed TURN to avoid duplicating A4NR's arguments in TURN's reply comments (the TURN reply comments referenced and adopted A4NR's positions regarding matters in the evidentiary record demonstrating that the ORA-PG&E revenue requirement would not result in just and reasonable rates).

Finally, although A4NR was compelled to support the adoption of the whole *Settlement Agreement* under the defense-related provisions of that agreement, A4NR sought, as an alternative to a reversal of the *Proposed Decision's* modification of four provisions of the settlement, a clarification of the process proposed by the *Proposed Decision* by which parties could contest those modifications. Under the *Proposed Decision*, parties objecting to the revision of these four provisions could file a motion requesting other relief and thereby keep this docket open for further proceedings. So as to assure that any such motion would not affect the bulk of the settlement which was adopted by the *Proposed Decision*, and importantly PG&E's announcement that DCNPP would be retired at the end of its current license period, A4NR sought to limit the scope of such motions to the four provisions modified by the *Proposed Decision*. This was a position uniquely raised by A4NR and required A4NR to file a separate set of opening comments on the *Proposed Decision*, in contrast to the majority of the other settling parties that filed a joint comments seeking the adoption of the entire settlement agreement in whole and without modification. A4NR's path on this position was guided by discussions held with the other settling parties and reflects its attempts to collaborate with other parties.

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

#	Intervenor's Comment	CPUC Discussion
A.	<p>The complexity and depth of A4NR's participation in this proceeding is evidenced in the work products developed and submitted into the record of this proceeding. Each of the issues and the substantial contributions A4NR made in developing the record and the provisions of the Settlement Agreement are represented, in part, by the following documents of record:</p> <p><i>Exhibit A4NR-1</i>, comprising the direct testimony of Rochelle Becker, addresses the recommendations enumerated as substantial contribution "6" above, and was served on April 29, 2016, and admitted to the record by ruling of the Administrative Law Judge on September 1, 2016;</p> <p><i>Exhibit A4NR-2</i>, comprising the direct testimony of John Geesman, addresses recommendations enumerated as substantial contributions "1", "2", "3", "4", and "5" above, was served on April 29, 2016, and admitted to the record by ruling of the Administrative Law Judge on September 1, 2016;</p> <p><i>Exhibit A4NR-3</i>, comprising over 500 pages includes A4NR's workpapers in support of <i>Exhibit A4NR-1</i> and <i>Exhibit A4NR-2</i>, was served on April 29, 2016, and admitted to the record by ruling of the Administrative Law Judge on September 1, 2016. This exhibit is illustrative of A4NR's focused discovery efforts, which consisted of (by PG&E's count) nearly 700 data requests propounded by A4NR in the development of the factual and substantive foundation for A4NR's recommendations. <i>Exhibit A4NR-3</i> includes a substantial amount of both the data requests propounded by A4NR and PG&E's responses, and the incorporation of a good majority of PG&E's responses into <i>Exhibit A4NR-3</i> is indicative of A4NR's effort to focus its participation on the facts and issues relevant to its participation;</p> <p><i>A4NR Motion to Exclude Testimony of PG&E</i>, filed on June 8, 2016. This motion was directed toward preserving A4NR's rights to address issues related to the retirement of DCNPP (<i>i.e.</i>, issues related to substantial contributions "2", "3", and "6", above) were procedurally proper by seeking to exclude or clarify the effect and substance of</p>	<p>Noted.</p> <p>However, as discussed above, some of the specific issues for which A4NR seeks compensation did not make a substantial contribution to D.17-05-013, even though they were addressed in the Settlement Agreement.</p>

	<p>certain testimony of PG&E that DCNPP retirement was “beyond the scope” of this general rate case. The motion was mooted by the execution and adoption of the <i>Settlement Agreement</i>, but importantly drew a concession from PG&E (see <i>PG&E Response to Motion to Exclude</i>, filed June 23, 2016, at p.2) that the testimony A4NR sought to exclude constituted “mere lay opinions” and should not be construed to preclude the submission of A4NR’s testimony to raise issues related to DCNPP’s retirement;</p> <p><i>Joint Comparison Exhibit</i>, Exhibit PG&E-37, Volume 1, at pp.2-321 to 2-322 (addressing substantial contributions “2” and “5” above), and Volume 2, at pp. 3-6 to 3-15 (addressing substantial contributions “1”, “3”, “4”, and “6” above), filed on August 3, 2016, and admitted to the record by ruling of the Administrative Law Judge on September 1, 2016</p> <p><i>Joint Motion for Adoption of Settlement Agreement</i>, and <i>Settlement Agreement</i> at Sections 3.1.4, 3.1.10.1, 3.2.3.1.1, 3.2.3.1.2, 3.2.3.1.3, 3.2.3.1.4, and 3.2.3.1.5, filed on August 3, 2016, addressing and/or resolving A4NR’s recommendations for the purposes of this proceeding;</p> <p><i>Opening Comments on Settlement Agreement</i> filed on August 18, 2016, addressing the reasonableness of the provisions of the Settlement Agreement addressing A4NR’s recommendations in this proceeding;</p> <p><i>Opening Comments on Proposed Decision</i> filed on March 20, 2017, addressing, <i>inter alia</i>, the limitations that should be placed on motions requesting further relief, noted as substantial contribution #7 above;</p> <p><i>Reply Comments on Proposed Decision</i> filed on March 27, 2017, addressing the lack of evidence supporting the adoption of a revenue requirement for a third post-test year, noted as substantial contribution #8 above; and,</p> <p>Joinder of A4NR in <i>Notice to Accept Alternative Terms</i> filed on May 26, 2017, closing this proceeding.</p>	
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PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

a. Intervenor’s claim of cost reasonableness – Substantial Contributions to the Outcomes of this Proceeding	CPUC Discussion
<p>As stated above, A4NR is informed and believes that its DCNPP-related recommendations contributed to the timing and substance of PG&E’s momentous decision to announce its plan to retire DCNPP upon the expiration the facility’s existing reactor operating licenses in 2024 (Unit 1) and 2025 (Unit 2). As pointed out in A4NR’s testimony, PG&E has for over a decade deferred making any definitive decisions regarding whether DCNPP should be operated beyond 2024-2025, notwithstanding that PG&E (a) was spending significant monies, time and effort to extend the current DCNPP operating licenses, (b) had continually omitted the issue of potential DCNPP replacement resources from long-term procurement dockets and other state proceedings, and (c) had failed to address directions from two Commission Presidents, including the Assigned Commissioner in this proceeding, to make such a decision and make appropriate state regulatory filings. A4NR’s fundamental strategy in this proceeding was to make recommendations that would provide the Commission with the regulatory tools that would force PG&E’s hand, whether by (a) requiring PG&E to provide the material information bearing on the duration of DCNPP’s future operations, and/or (b) reducing DCNPP-generated free cash flow by adjusting DCNPP-related annual depreciation expense under an assumption that, unless and until PG&E abandoned the DCNPP license extension application pending before the Nuclear Regulatory Commission, DCNPP would be operated until 2044-2045, and/or (c) allocating greater levels of financial risks to PG&E to protect customers from DCNPP safety or reliability failures (<i>e.g.</i>, by adopting performance-based ratemaking).</p> <p>The announcement of DCNPP’s retirement was an enormous, momentous event and A4NR submits the benefits to PG&E’s customers and the state will be equally enormous and momentous. In combination with this achievement, the manner in which A4NR’s six DCNPP-related substantive recommendations were resolved in the <i>Settlement Agreement</i> fully support the reasonableness of the costs A4NR claims for its participation in this proceeding. Each of the six recommendations A4NR submitted will either result in additional positive benefits to customers through their impact on PG&E’s Energy Supply line of business, or have been preserved for later prosecution through appropriate procedural means in the event DCNPP is not retired upon the expiry of its current operating</p>	<p>Noted. However, as discussed above, some of the specific issues for which A4NR seeks compensation did not make a substantial contribution to D.17-05-013, even though they were addressed in the Settlement Agreement.</p>

licenses. The Commission's adoption of the DCNPP-related provisions of the *Settlement Agreement* in this case will result in the following impacts:

1. A4NR's recommendation that DCNPP-related revenue requirement should be removed from base rates and recovered through a performance-based ratemaking schedule would have provided an effective financial means of enforcing the Commission's policies related to the safety of utility operations and addressing specific deficiencies found in PG&E's showing regarding the reasonableness of PG&E's safety-based budgets and projects for DCNPP. This recommendation has been suspended pending the outcome of other proceedings addressing the terms and conditions under which DCNPP would be retired and replaced, but A4NR is informed and believes this recommendation resulted in the timing and substance of PG&E's announcement to retire DCNPP at the end of DCNPP's current license period. Thus, PG&E's customers may yet benefit from the realignment of financial risks associated with DCNPP-related safety and reliability failures, and the Commission has been provided with an awareness of the regulatory tools that can be applied to enforce its safety-related policies for this and other utility facilities;
2. A4NR's recommendation that the Commission exclude the costs of PG&E's proposed project to replace the DCNPP Unit 2 main generator stator from PG&E's revenue requirement resulted in the reconsideration of the project on PG&E's part and PG&E's withdrawal of its request for approval of the project. This removes a project costing as much as \$151 million from PG&E's 2019 revenue requirement and, depending on PG&E's further evaluations and DCNPP's imminent retirement, could result in the abandonment of the project;
3. A4NR's recommendation that the Commission adjust annual depreciation expense related to PG&E's remaining investment in DCNPP-related assets so as to be consistent with PG&E's internal analyses and policies related to the remaining useful life of those assets has been suspended pending the outcome of other proceedings addressing the terms and conditions under which DCNPP would be retired and replaced. Thus, depending on the outcome of those proceedings, PG&E's customers may yet benefit from this recommendation, but A4NR is informed and believes this recommendation resulted in the timing and substance of PG&E's announcement to retire DCNPP at the end of DCNPP's current license period;

<p>4. A4NR's recommendation that the Commission reject PG&E's proposal to terminate the DCNPP seismic studies balancing account is fully reflected in the provisions of the <i>Settlement Agreement</i> adopted by the Commission. This result preserves the Commission's immediate and timely access to the results of the DCNPP seismic studies and will facilitate the review of the financial impacts of continuing DCNPP operations in the event the studies revealed the need for seismic upgrades or new safety-related projects or programs;</p> <p>5. A4NR's recommendation that the Commission omit the costs of the DCNPP Independent Spent Fuel Storage Installation expansion project from rates was resolved by the provisions of the <i>Settlement Agreement</i> adopted in D.17-05-013. A4NR's recommendation was intended to enforce a condition precedent adopted by the Commission in PG&E's Test Year 2014 general rate case related to PG&E's full compliance with the recommendations of the California Energy Commission regarding the expedited transfer of spent fuel assemblies to dry cask storage. The <i>Settlement Agreement</i> provides that PG&E will provide plans for such transfers in an upcoming triennial decommissioning proceeding, such plans to be developed in consultation with the Energy Commission and in accordance with state policies expressed in prior <i>Integrated Energy Policy Reports</i>;</p> <p>6. A4NR's recommendation that PG&E be required to file an annual Tier 1 advice letter providing specifically enumerated, material information to the Commission and the public bearing on PG&E's plans to extend the licenses and authorities for DCNPP beyond 2024 and 2025 was resolved by the <i>Settlement Agreement</i>. A4NR and PG&E agreed to conform the annual filing recommended by A4NR to information relevant to DCNPP's operation under an assumption that the plant will be retired in 2024-2025 and, based upon this agreement, PG&E will file information annually bearing on DCNPP's condition bearing on DCNPP's retirement date and operations;</p> <p>7. A4NR's recommendation that the Commission reject the ORA-PG&E proposal to add a third post-test year revenue requirement to the rate relief granted in this application was adopted in reliance, in part, on A4NR's argument that the evidentiary record did not support the reasonableness of that revenue requirement; and,</p> <p>8. A4NR's recommendation that the Commission limit any motion seeking further relief under Rule 12.4(c) to matters in the <i>Settlement Agreement</i> that were modified by the Commission's orders was</p>	
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adopted. The Commission agreed with A4NR's proposed clarification, over the objection of PG&E, and limited the scope of any motion requesting further relief to the four matters in the *Settlement Agreement* modified by D.17-05-013.

Reasonableness of Staffing:

The foregoing results were achieved by the assembly and work of a team of expert staff experienced in the intimate details of ratemaking, energy policy and nuclear operations. A4NR's testimony demonstrates the application of the team's collective experience and expertise – that testimony addresses highly complex subject matters and propositions, and is supported by hundreds of pages of testimony, workpapers and pleadings.

In conducting and managing its participation in this proceeding, A4NR assigned specific tasks to individual members of the team based on their unique specialties, areas of expertise, skills, and experience. The efficient management of assignments and allocation of responsibilities was an intentional part of A4NR's internal case management processes and were designed to keep costs to a minimum by avoiding duplication of effort and any overlapping of assignments. These processes resulted in a division of labor among team members based on their unique abilities to contribute to A4NR's showing in this case and avoided any duplication of effort. In some cases, members of the team collaborated to share work assignments if called for by the subject matter and as justified by their experience and expertise in order to promote the quality and veracity of A4NR's work products and participation, but A4NR limited the instances in which this occurred to a minimum. These efforts to avoid duplication of effort among team members is reflected in the allocation of hours to the specific issues as set forth below in Section III.B.b of this request for intervenor compensation.

The unique experience and expertise of each of the members of the team assembled for A4NR's participation is briefly described below:

- Rochelle Becker is the Executive Director of A4NR and was responsible for providing policy direction for and approving all aspects of A4NR's participation in this proceeding. She has personally participated in numerous proceedings before this Commission and the Nuclear Regulatory Commission on topics related to DCNPP, and owns a national reputation for her advocacy on nuclear energy policymaking and ratemaking. Her experience was more specifically applied in developing those portions of A4NR's showing related to

<p>regulatory-reporting requirements and ensuring that A4NR's showing emphasized the enforcement of this Commission's safety policies;</p> <ul style="list-style-type: none"> • John Geesman is an attorney and member in good standing of the State Bar of California. He also has considerable experience as an investment banker and financial expert. As a former Executive Director and Commissioner of the California Energy Commission, he is intimately familiar with California energy policy and regulatory policymaking. He has participated on behalf of A4NR in numerous Commission proceedings related to DCNPP and other matters related to nuclear power and operations. He was the principal ratemaking witness for A4NR in this proceeding and directed the preparation of the detailed regulatory, ratemaking and engineering analyses presented in the bulk of A4NR's testimony. He earlier served as A4NR's sole attorney of record for in Rulemaking14-02-001, which provided much of the evidentiary record of PG&E's efforts to characterize DCNPP as a load-following resource. In particular, he brought a unique executive-branch and financial expertise to issues related to DCNPP's seismic setting and the potential costs of dealing with safety and/or reliability failures – these matters were expressed in A4NR's recommendations related to the Schedule DC performance-based ratemaking proposal and the omission of ISFSI project costs from PG&E's revenue requirement until such time as PG&E adequately addressed the Energy Commission's long-term recommendations related to the storage of spent fuel assemblies; • Richard Wolfe served as A4NR's engineering consultant in this proceeding. He is a co-founder and officer of Resero Consulting, a nationally recognized economic and engineering consultancy, with a specialized expertise in California energy markets. Having held a senior reactor operator's license during his tenure as a manager at the Rancho Seco Nuclear Station, he was well-qualified to review and critique PG&E's proposals and cost estimates regarding the replacement of the DCNPP Unit 2 main generator stator and directed the development of A4NR's positions regarding this project; • Ellen Wolfe served as A4NR's economic consultant in this proceeding. She is a co-founder and officer of Resero Consultant, along with Mr. Wolfe. She owns a national 	
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<p>reputation as an expert consultant on wholesale power markets and economic and financial modeling;</p> <ul style="list-style-type: none">• Alvin Pak is an attorney and a member in good standing of the State Bar of California. He served as A4NR's principal counsel in this proceeding. In this role, he was responsible for managing the work efforts and contributions of the legal team, and for the final review and production of the work products A4NR presented in this proceeding. He has almost forty years of experience in California ratemaking, including time spent as a staff counsel and commissioner's advisor at this Commission, as an attorney for a major California energy utility, and in private practice. As a result of this experience, he has been qualified to testify as an expert in regulatory accounting and ratemaking by two federal district courts. He also was the project manager of and the principal analyst for the groundbreaking SDG&E applications proposing and implementing performance-based ratemaking in the early 1990s. His experience was specifically applied in the development of A4NR's proposals regarding Schedule DC as a replacement for traditional ratemaking for DCNPP and PG&E's proposed DCNPP-related annual depreciation expense;• Gwenn O'Hara is an attorney and a member in good standing of the State Bar of California. She served as primary counsel for the Department of Water Resources Energy Resources Scheduling in the administration of the agency's \$40 billion portfolio of energy and gas contracts. In this capacity, Ms. O'Hara was responsible for the coordination and development of utility operating agreements, and she assisted in the review and adoption of CERS' annual revenue requirement proceedings before the Commission. This experience, along with her expertise in risk analysis related to major infrastructure projects, was applied to help identify ratemaking issues and deficiencies in PG&E's safety risk analyses. In this proceeding, she focused on the development of legal theories and discovery strategy supporting A4NR's recommendations;• Ann Springgate is an attorney and a member in good standing of the State Bar of California. She served as litigation counsel during the trial preparation phase of A4NR's participation in this proceeding. She has extensive experience in the California power markets and has served as counsel to various market participants. As lead in-house	
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<p>counsel for the Judicial Branch of California, Administrative Office of the Courts, she has expertise in the review and development of risk-weighted cost analyses. In addition, she has served as a lead attorney for the Federal Emergency Management Agency: in this capacity, she worked on risk-management and disaster-recovery issues, including providing on-ground supervision and legal assistance during recovery efforts for a variety of major disasters, from the World Trade Center attack to the Hurricane Katrina recovery. She applied this unique expertise to identifying the deficiencies in PG&E's analyses of safety risks and nuclear operations, which were incorporated into A4NR's showing regarding Schedule DC as method of insulating PG&E's customers from financial risks arising from safety and/or reliability failures at DCNPP;</p> <ul style="list-style-type: none"> • Meghan Cox is an attorney and a member in good standing of the State Bar of California. She has extensive experience in the California power markets and has served as counsel to various market participants. This experience includes providing advice to the California Department of Water Resources regarding their various revenue requirement proceedings before the Commission. In addition, prior to becoming a lawyer, she served as a Budget Analyst with the California Treasurer's Office, where she was responsible for monitoring, adjusting and seeking variances to budgets set by the State Legislature and the Department of Finance for the numerous boards, commissions and authorities under the Treasurer's administrative purview. This unique perspective allowed her to provide advice on certain procedural aspects and policy considerations as well as the value in maintaining different accounts for different items, including the issue of the seismic balancing account. As litigation counsel during the trial preparation phase of A4NR's participation in this proceeding, she was responsible for conducting certain aspects of the discovery, drafting and serving filings early in the proceeding and the editing of A4NR work products during this proceeding. Her availability also allowed A4NR to reduce its costs of participation by assigning certain tasks to an attorney with a lower hourly charge rate; and, • David Weisman is an A4NR director and member of A4NR's senior staff. He is intimately familiar with the history of A4NR's participation before the Commission and the Nuclear Regulatory Commission, as well as the proceedings conducted and orders issued by both agencies. 	
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Due to this unique knowledge and his understanding of regulatory policy, he provided expert and efficient litigation support to A4NR's attorneys and witnesses by performing regulatory-legal and factual research in support of their work and participation. This allowed A4NR to minimize its costs of participation by transferring this work to the efficient work of a non-attorney, while assuring that A4NR's arguments and propositions were fully supported by and consistent with regulatory precedents and policies.

As this matter progressed, the claimed hours reflected in the attached exhibits showing the detailed breakdown of work by the team member also demonstrates that A4NR reduced the number of team attorney-members working on this matter. The unique specialties and focus of each of the attorney-members of the team provided the greatest benefits during the preparatory phase of A4NR's participation in this matter and, as the matter proceeded to hearing and settlement, the need for more than one attorney handling this matter also declined and A4NR reduced the size of the team accordingly and thereby promoted the cost-efficiency of its efforts. This resulted in a further reduction in the potential for duplication of effort and overlapping assignments altogether and further kept hourly charges and legal fees to a minimum.

Finally, it was A4NR's practice to assign tasks to the members of the team with the lowest charge rates where and as appropriate so as to reduce its costs of participation even further. For example, attorneys were encouraged to rely on A4NR staffer David Weisman to perform regulatory research and manage documents in order to reduce A4NR's costs of litigation and legal fees. Because he has a long history of dealing with DCNPP-related regulatory matters, he was able to perform this research more quickly and efficiently than could the attorneys working on behalf of A4NR; his research was, however, subject to their supervision and necessary follow-up review of his conclusions and recommendations as required by the California rules of and common law related to professional conduct applicable to attorney-paralegal relationships.

Travel Costs and Expenses

A4NR's costs of travel were limited to attendance at (a) the informal meetings and formal proceedings conducted under the auspices of the Commission and Commission's Diablo Canyon Independent Safety Committee, (b) settlement meetings involving the other parties, particularly face-to-face negotiations with PG&E, (c) meetings with the ORA and/or TURN related to the coordination of

positions and A4NR's participation in this proceeding, and (d) a limited number of team meetings where conduct of the meeting by teleconference would have been impractical or inefficient, *e.g.*, during strategy sessions, mock cross-examination sessions, and meetings with PG&E related to settlement and DCNPP's retirement. A4NR notes that it conducted the vast majority of the meetings otherwise described in (b), (c) and (d) by teleconference so as to limit travel expenses. A4NR further notes that it minimized its claimed travel expenses by adopting and enforcing an internal rule that non-productive time spent by its lawyers for A.16-08-006 for travel would not be billed to A4NR (and thereby excluded from this request for intervenor compensation), despite the opportunity cost associated with that time – this provided an incentive to reduce travel and select the most efficient venues and, as a result, travel time spent by A4NR's attorneys is not included in this claim for compensation. (Note: This internal rule did not apply to hours spent for travel by A4NR's counsel in R.14-02-001 or for hours spent for travel by A4NR's experts and advocates.) For the foregoing reasons, A4NR submits its claim for travel expenses was carefully managed and that its costs of travel are reasonable and should be reimbursed.

The remainder of A4NR's claimed expenses is related to the costs of printing and mailing, generally as required for the preparation, filing, service, and mailing of documents and correspondence necessitated by A4NR's participation in this proceeding under the Commission's rules of practice and procedures. The claimed costs for these expenses represent out-of-pocket costs charged at or below market rates for the services rendered to A4NR by third-party vendors. Claimed expenses are itemized in Attachment 4 and receipts for items in excess of \$20 are included in Attachment 4.

A4NR also notes that costs associated with legal research, *e.g.*, charges for Lexis/Nexis and Westlaw have been omitted from this request for intervenor compensation. This omission comports with the attorneys' agreement to waive such charges for work performed during their A4NR engagement, further evidence that A4NR's claim for expenses is reasonable and that A4NR attempted to minimize its expenses in this proceeding to reasonable amounts.

Hours Spent on this Compensation Request:

A4NR is also claiming 20.2 hours spent in the preparation of this claim for intervenor compensation. Given the length of the proceeding and the extensiveness of the records reviewed and provided in support of this claim, A4NR assigned the majority of the

<p>tasks associated with preparing this compensation request on the team members with the lowest applicable hourly rates so as to assure efficiency in the preparation of the request and attachments. A4NR submits that the costs of preparing this request are reasonable and should be granted.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>As discussed above, A4NR adopted and abided by internal rules and processes designed to both minimize the number of hours claimed and the costs of the hours included in this request. Work assignments were made on the basis of a team member's expertise. Hours spent in meetings and for coordinating the different assignments between team members were strictly controlled so as to minimize the number of hours spent on A4NR's participation. And assignments were made, to the extent possible and consistent with the rules of professional responsibility adopted by the California State Bar, based on considerations of cost-efficiency.</p>	<p>A4NR indicates that it relies on D.16-01-033 in R.14-02-001 regarding "the transfer of hours and expenses associated with A4NR's participation in R.14-02-001 to this proceeding with respect to issues arising from PG&E's proposal to use DCNPP as a load-following resource."</p> <p>The Commission finds that such a transfer of hours is not consistent with the Commission's direction in D.16-01-033. That decision ordered that "If another proceeding assumes Track 1 or Track 2 issues, work performed by an intervenor in Rulemaking 14-02-001 may be considered for intervenor compensation in</p>

	<p>such other proceeding.”¹³</p> <p>R.14-02-001 was the Commission’s “Rulemaking to Consider Electric Procurement Policy Refinements pursuant to the Joint Reliability Plan.”</p> <p>Track 1 of R.14-02-001 pertained to two- and/or three-year forward-looking Resource Adequacy procurement requirements.</p> <p>Track 2 of R.14-02-001 pertained to implementation of a long-term joint reliability planning assessment with the CAISO and CEC.</p> <p>The scope of this PG&E GRC did not include either of the issues from R.14-02-001 listed above. Therefore, those hours claimed by A4NR in this proceeding do not merit compensation.</p> <p>The timesheets submitted by A4NR include claims for hours 164 “hours transferred based</p>
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¹³ D.16-01-033, Ordering Paragraph 3.

	on D.16-01-033.” Those hours have been deducted from the hours claimed for the associated A4NR witnesses.
<p>c. Allocation of hours by issue:</p> <p>A4NR allocated its claimed hours to the eight issues it addressed during its participation. (Note: Hours spent on two issues which were not included in any part of A4NR’s showing have been omitted from this request for compensation, although those hours appear on billing records submitted to A4NR pursuant to the engagement letters executed by A4NR with its outside attorneys and consultants.) Some hours spent in preparation for different general aspects of participation (e.g., reviewing third-party testimony to determine effects on A4NR’s showing, or for participating in the prehearing conference or making other appearances) were separately coded as shown below.</p> <p>A4NR used the following codes to allocate its hours across the issues it presented in this proceeding (see Attachment 3):</p> <p>“T A/L” (Annual Tier 1 Advice Letter) – 15.0% of total</p> <p>These hourly charges are related to A4NR’s proposal that PG&E be required to submit an annual advice letter addressing the material factors affecting PG&E’s pursuit of the DCNPP license extensions and/or DCNPP operating conditions. This includes time spent analyzing the history of PG&E’s pursuit of the DCNPP license extensions, including the two informal requests for information made by Commission Presidents related to the license extensions, and developing the comprehensive set of information the Commission should require on an annual basis relevant to the license extensions. These charges include time spent negotiating the final resolution of this recommendation and the manner in which A4NR’s position was addressed in the <i>Settlement Agreement</i>;</p> <p>“DC” (Schedule DC Ratemaking Mechanism) –19.4% of total</p> <p>These hourly charges are related to A4NR’s proposal that DCNPP-related revenue requirement be recovered by PG&E through a performance-based ratemaking mechanism, dubbed “Schedule DC.” These hourly charges reflect the time spent analyzing PG&E’s risk assessments and the applicability of risk-based budgeting in the context of DCNPP operations and developing an appropriate regulatory response to the identified deficiencies and potential</p>	<p>A4NR requests compensation for 347 hours allocated to “General Preparation” (Time Spent in Necessary Preparation for A4NR’s Effective Participation but Not Related to any Specific or Single Issue). We note that other intervenors in this proceeding on average allocated 69.2 hours to “General Preparation.”</p>

residual risks borne by PG&E’s customers. This proposal remains pending in recognition of PG&E’s agreement to terminate its pursuit of the DCNPP license extensions; certain provisions of the *Settlement Agreement* negotiated by A4NR preserve A4NR’s right to raise this issue pursuant to appropriate procedural means in the event DCNPP is not retired in or prior to 2024-2025. The charges related to this recommendation include the time spent drafting and negotiating the provisions memorializing this reservation of rights.

“SP” (DCNPP Unit 2 Main Generator Replacement Project) – 13.1% of total

These charges are related to A4NR’s recommendation that the Commission exclude the costs of PG&E’s proposal to replace the DCNPP Unit 2 main generator stator. The time spent on this issue included an engineering and operations investigation into the condition of the stator equipment and a critical review of the project justifications relied upon by PG&E management in approving the project. These charges also include time spent negotiating the final resolution of this recommendation and the manner in which A4NR’s position was addressed in the *Settlement Agreement*.

“ADE” (DCNPP Annual Depreciation Expense Reduction) – 9.2% of total

These charges are related to A4NR’s proposal that the Commission reduce the DCNPP-related annual depreciation expense reflected in revenue requirement. These charges include time spent reviewing PG&E’s depreciation study and reconciling the general principles applied in the development of depreciation expenses to DCNPP remaining investment. This proposal remains pending in recognition of PG&E’s agreement to terminate its pursuit of the DCNPP license extensions; certain provisions of the *Settlement Agreement* negotiated by A4NR preserve A4NR’s right to raise this issue pursuant to appropriate procedural means in the event DCNPP is not retired in or prior to 2024-2025; these charges include the time spent drafting and negotiating the provisions memorializing this reservation of rights.

“SSBA” (Retaining the DCNPP Seismic Studies Balancing Account) – 7.6% of total

These charges are related to A4NR’s recommendation that the Commission reject PG&E’s proposal to eliminate the DCNPP Seismic Studies Balancing Account; the account presents a means by which the Commission can receive and review PG&E’s ongoing assessments of DCNPP’s seismic setting and address the financial

<p>implications of resolving safety- and reliability-related concerns raised by any new findings or NRC seismic-related regulations. These charges include time spent evaluating the purposes, practices and value of the existing balancing account. These charges also reflect the time spent negotiating, drafting and incorporating PG&E's agreement to A4NR's recommendation into the Settlement Agreement.</p> <p>“ISFSI” (Omission of Costs of ISFSI Expansion Project from Revenue Requirements) – 11.7% of total</p> <p>These charges are related to A4NR's proposal that the Commission omit the capital costs of the DCNPP ISFSI expansion project from rates. This includes time spent evaluating the costs of the project, as well as reviewing the regulatory preconditions adopted in PG&E's Test Year 2014 general rate case regarding the reflection of the project's costs in rates and developing a proposal that would be consistent with State energy policies regarding spent fuel storage adopted in the Energy Commission's Integrated Energy Policy Report. These charges also include the time spent negotiating, drafting and incorporating PG&E's agreement to address spent-fuel storage policies in its upcoming DCNPP decommissioning cost filing.</p> <p>“PTY3” (Opposition to Third Post-Test Year Allowances) – 0.8% of total</p> <p>These charges are related to A4NR's joinder in the opposition to the ORA-PG&E proposal to set a revenue requirement for a third post-test year and delay PG&E's next general rate case filing by one year. This includes time spent evaluating the competing positions, collaborating with others to determine whether A4NR could contribute unique views and analyses on this matter, and developing policy and legal arguments in support of a position.</p> <p>“MRFR” (Limitation on Motions Requesting Further Relief) – 1.0% of total</p> <p>These charges are related to A4NR's recommendation that the Commission adopt limitations on the rights of parties to contest the four modifications to the <i>Settlement Agreement</i> adopted in the Commission's decision. These charges include spent negotiating with the other settling parties regarding A4NR's rights to propose any such limitations in light of the mutual and joint defense provisions of the <i>Settlement Agreement</i> and the assertion of A4NR's position on this matter before the Commission during the final</p>	
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comment period.

“GP” (Time Spent in Necessary Preparation for A4NR’s Effective Participation but Not Related to any Specific or Single Issue) – 22.1% of total

These charges include time spent in preparation for A4NR’s participation and preparation generally, including time spent reviewing PG&E’s application and third-party filings to determine their relevance to A4NR’s positions and recommendation. This also included time spent collaborating with other parties, including PG&E, regarding common issues or agreements to avoid duplication and overlap on matters tangential, but not central, to A4NR’s recommendations. This category also includes travel time related to the administration of A4NR’s participation (e.g., attendance at the prehearing conference and public participation hearings); travel time is claimed at half the otherwise requested hourly rate and amounts to 104 hours out of a total 348 hours allocated to this category.

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Alvin Pak, attorney	2015	120.3	\$570	Resolution ALJ-329 (see Comment 1 below and Attachment 5)	\$68,571	58.66 [4,6]	\$570	\$33,436.20
Alvin Pak, attorney	2016	314.3	\$570	Resolution ALJ-329 (see Comment 1 below and Attachment 5)	\$179,151	174.68 [4,6]	\$575 ¹⁴	\$100,441.00
Alvin Pak, attorney	2017	25.5	\$570	Resolution ALJ-329 (see Comment 1 below and Attachment 5)	\$14,535	25.15 [4,6]	\$585 ¹⁵	\$14,712.75
Gwenn O’Hara,	2015	18.3	\$570	Resolution ALJ-329	\$10,431	13.81 [4,6]	\$570	\$7,871.70

¹⁴ See D.18-10-050.

¹⁵ See D.18-10-050.

attorney				(see Comment 2 below and Attachment 6)				
Gwenn O'Hara, attorney	2016	27.0	\$570	Resolution ALJ-329 (see Comment 2 below and Attachment 6)	\$15,390	10.88 [4,6]	\$575 ¹⁶	\$6,256.00
Ann Springgate, attorney	2015	56.7	\$570	Resolution ALJ-329 (see Comment 3 below and Attachment 6)	\$32,319	29.47 [4,6]	\$320	\$9,430.40
Ann Springgate, attorney	2016	59.9	\$570	Resolution ALJ-329 (see Comment 3 below and Attachment 6)	\$34,143	33.62 [4,6]	\$325 ¹⁷	\$10,926.50
Meghan Cox, attorney	2015	65.9	\$320	Resolution ALJ-329 (see Comment 4 below and Attachment 6)	\$21,088	29.6 [4,6]	\$320	\$9,472.00
Meghan Cox, attorney	2016	72.6	\$320	Resolution ALJ-329 (see Comment 4 below and Attachment 6)	\$23,232	43.41 [4,5,6]	\$325 ¹⁸	\$14,108.25
John Geesman attorney	2014	74.0	\$570	D.15-11-014 and Resolution ALJ-329 (see Comment 5 below)	\$42,180	0 [3]	\$0	\$0.00
John Geesman attorney	2015	8.73	\$570	D.15-11-014 and Resolution ALJ-329 (see Comment 5 below)	\$4,976.10	44.598 [1,3,4,6]	\$570 ¹⁹	\$25,420.86
John	2015	96.27	\$420	D.15-11-014 and	\$40,433.40	0	\$0	\$0.00

¹⁶ Application of Res. ALJ-329 – 1.28% Cost of Living Adjustment.

¹⁷ Application of Res. ALJ-329 – 1.28% Cost of Living Adjustment.

¹⁸ Application of Res. ALJ-329 – 1.28% Cost of Living Adjustment.

¹⁹ See D.18-10-050.

Geesman, policy and financial expert witness				Resolution ALJ-329 (see Comment 5 below)				
John Geesman, policy and financial expert	2016	110.68	\$420	D.15-11-014 and Resolution ALJ-329 (see Comment 5 below)	\$46,485.60	0	\$0	\$0.00
John Geesman attorney	2016					51.305 [4,5,6]	\$580	\$29,756.90
John Geesman, policy and financial expert	2017	1.14	\$420	D.15-11-014 and Resolution ALJ-329 (see Comment 5 below)	\$478.80	0	\$0	\$0.00
John Geesman attorney	2017					1.074 [4,6]	\$590	\$633.66
Richard Wolfe, engineering consultant	2016	54.75	\$420	Resolution ALJ-329 (see Comment 6 below and Attachment 7)	\$22,995	47.905 [4,6]	\$425 ²⁰	\$20,359.63
Ellen Wolfe, economic consultant	2016	3.25	\$420	Resolution ALJ-329 (see Comment 6 below and Attachment 8)	\$1,365	2.975 [6]	\$425 ²¹	\$1,264.38
Rochelle Becker, advocate	2014	10.07	\$140	D.15-11-014 and Resolution ALJ-329 (see Comment 7 below)	\$1,409.80	0 [3]	\$140	\$0.00
Rochelle Becker, advocate	2015	40.86	\$140	D.15-11-014 and Resolution ALJ-329 (see Comment 7 below)	\$5,720.40	23.371 [3,4,6]	\$140	\$3,271.94

²⁰ See D.18-10-050.

²¹ See D.18-10-050.

Rochelle Becker, advocate	2016	106.04	\$140	D.15-11-014 and Resolution ALJ-329 (see Comment 7 below)	\$14,845.60	55.185 [4,5,6]	\$140	\$7,725.90
Rochelle Becker, advocate	2017	6.59	\$140	D.15-11-014 and Resolution ALJ-329 (see Comment 7 below)	\$922.60	4.986 [4,6]	\$145 ²²	\$722.97
David Weisman, advocate	2014	4.4	\$85	D.15-11-014 and Resolution ALJ-329 (see Comment 8 below)	\$374.00	0 [3]	\$85	\$0.00
David Weisman, advocate	2015	55.79	\$85	D.15-11-014 and Resolution ALJ-329 (see Comment 8 below)	\$4,742.15	28.536 [3,4,6]	\$85	\$2,425.56
David Weisman, advocate	2016	90.76	\$85	D.15-11-014 and Resolution ALJ-329 (see Comment 8 below)	\$7,714.60	43.37 [4,5,6]	\$85	\$3,686.45
David Weisman, advocate	2017	1.87	\$85	D.15-11-014 and Resolution ALJ-329 (see Comment 8 below)	\$158.95	1.356 [4,6]	\$90 ²³	\$122.04
Subtotal: \$593,662.00						Subtotal: \$302,045.08		
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 \$
John Geesman, Attorney (travel time at half of hourly rate)	2014	15.0	285	D.15-11-014 and Resolution ALJ-329 (see Comment 5 below)	\$4,275	0 [3]	\$0	\$0.00
John	2015	8.0	210	D.15-11-014 and	\$1,680	0	\$0	\$0.00

²² Application of Res. ALJ-345 – 2.14% Cost of Living Adjustment.

²³ Application of Res. ALJ-345 – 2.14% Cost of Living Adjustment.

Geesman, policy and financial expert (travel time at half of hourly rate)				Resolution ALJ-329 (see Comment 5 below)				
John Geesman, Attorney (travel time at half of hourly rate)	2015					8	\$285	\$2,280.00
John Geesman, policy and financial expert (travel time at half of hourly rate)	2016	18.75	210	D.15-11-014 and Resolution ALJ-329 (see Comment 5 below)	\$3,937.50	0	\$0	\$0.00
John Geesman, Attorney (travel time at half of hourly rate)	2016					18.75	\$290	\$5,437.50
Rochelle Becker, advocate (travel time at half of hourly rate)	2014	14.0	\$70	D.15-11-014 and Resolution ALJ-329 (see Comment 7 below)	\$980	0 [3]	\$70	\$0.00
Rochelle Becker, advocate (travel time at half of hourly rate)	2015	27.0	\$70	D.15-11-014 and Resolution ALJ-329 (see Comment 7 below)	\$1,890	23 [3]	\$70	\$1,610.00
Rochelle Becker, advocate (travel time at half of hourly rate)	2016	33.0	\$70	D.15-11-014 and Resolution ALJ-329 (see Comment 7 below)	\$2,310	31.5 [5]	\$70	\$2,205.00
David	2014	8.0	\$42.5	D.15-11-014 and	\$340	0 [3]	\$0	\$0.00

Weisman, advocate (travel time at half of hourly rate)				Resolution ALJ-329 (see Comment 8 below)				
David Weisman, advocate (travel time at half of hourly rate)	2015	10.0	\$42.50	D.15-11-014 and Resolution ALJ-329 (see Comment 8 below)	\$425	10	\$42.50	\$425.00
David Weisman, advocate (travel time at half of hourly rate)	2016	12.0	\$42.50	D.15-11-014 and Resolution ALJ-329 (see Comment 8 below)	\$510	16 [7]	\$45	\$720.00
Subtotal: \$16,347.50						Subtotal: \$12,677.50		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Alvin Pak (at half of hourly rate)	2017	2.5	\$285	Resolution ALJ-329 (see Comment 1 below and Attachment 5)	\$712.50	2.5	\$292.50	\$731.25
John Geesman (at half of hourly rate)	2017	1.5	\$210	D.15-11-014 and Resolution ALJ-329 (see Comment 5 below)	\$315.00	1.5	\$295.00	\$442.50
Richard Wolfe (at half of hourly rate)	2017	1.0	\$210	Resolution ALJ-329 (see Comment 6 below and Attachment 7)	\$210.00	1.0	\$217.50 ²⁴	\$217.50
Meghan Cox (at half of hourly rate)	2017	4.5	\$160	Resolution ALJ-329 (see Comment 4 below and Attachment 6)	\$720.00	4.5	\$165 ²⁵	\$742.50

²⁴ Application of Res-ALJ-345 – 2.14% Cost-of-Living Adjustment for a 2017 rate of \$435.00. As claim preparation hours are compensated at ½ the preparer's normal hourly rate we adjust it here.

²⁵ Application of Res-ALJ-345 – 2.14% Cost-of-Living Adjustment for a 2017 rate of \$330.00. As claim preparation hours are compensated at ½ the preparer's normal hourly rate we adjust it here.

David Weisman (at half of hourly rate)	2017	10.7	\$42.50	D.15-11-014 and Resolution ALJ-329 (see Comment 8 below)	\$454.75	10.7	\$45	\$481.50
Subtotal: \$2,412.25						Subtotal: \$2,615.25		
COSTS								
#	Item	Detail			Amount	Amount		
1.	Printing and copying	Printing and copying of various filings and documents (see itemization in Attachment 4, receipts included for individual items over \$20)			\$1,176.26	\$208.72 [8]		
2.	Postage and mailing	First class mailing postage and materials for documents served upon Assigned Commissioner, Administrative Law Judge and parties (see itemization in Attachment 4; no receipts attached since all individual items were less than \$20)			\$56.94	\$56.94		
3.	Travel	Airfare, hotel, transportation, and parking charges (see itemization in Attachment 4; receipts included for individual items over \$20)			\$16,261.87	\$14,845.47 [9]		
					\$17,495.07	Subtotal: \$15,111.13		
					TOTAL REQUEST: \$613,569.32	TOTAL AWARD: \$332,448.96		
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors’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 are typically compensated at ½ of preparer’s normal hourly rate</p>								

ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR²⁶	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Alvin S. Pak	May 31, 1979	85502	No
Gwenneth O’Hara	January 20, 2000	206100	No
Ann Springgate	December 14, 1987	131469	No
Meghan Cox	December 1, 2009	264750	No
John Geesman	June 28, 1977	74448	No

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

Attachment or Comment #	Description/Comment
Attachment 1	Notice of Availability
Attachment 2	Certificate of Service
Attachment 3	Time Sheet Records with Allocation of Hours by Issue and Contribution to Decision 17-05-013
Attachment 4	Cost and Expense Records (with receipts for individual expenses exceeding \$20)
Attachment 5	Resumé of Alvin S. Pak
Attachment 6	Resumés of Gwenneth O’Hara, Ann Springgate, and Meghan Cox
Attachment 7	Resumé of Richard Wolfe
Attachment 8	Resumé of Ellen Wolfe
Comment 1	Hourly Rate for Alvin S. Pak: A4NR requests that compensation for the time billed by Alvin Pak, our senior and lead attorney, be established in this proceeding at an hourly rate of \$570 per hour. Although the Commission has not previously established an hourly rate for Mr. Pak, as this is his first proceeding representing a non-profit organization eligible for intervenor compensation, he has appeared before the Commission in numerous proceedings beginning in 1979. For the purposes of this proceeding, he agreed to represent and has billed A4NR for his services at the requested hourly rate, which is at the upper end of the range established in Resolution ALJ-329 for attorneys with more than

²⁶ This information may be obtained through the State Bar of California’s website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

	<p>twelve years of experience. Mr. Pak had been a practicing attorney in California for more than thirty-five years at the time he agreed to represent A4NR before the Commission.</p> <p>In considering the reasonableness of the requested hourly rate for Mr. Pak, A4NR submits that in his private law practice he represents other corporate clients before this Commission, as well as other federal and state regulatory commissions, at a standard hourly rate some thirty percent (30%) higher than the hourly rate requested by A4NR for his work in this proceeding. A4NR is his only non-profit client eligible for intervenor compensation and he agreed to represent A4NR at the Commission-adopted hourly rates to give voice to A4NR's concerns in this proceeding regarding the indefinite status of DCNPP's license extension proceeding.</p> <p>A4NR submits that the requested hourly rate for Mr. Pak is justified based upon his thirty-eight years of legal experience involving the representation of public-utility and other clients before federal and state public utility regulators across the country; most of his work has focused on California-related matters, projects and controversies subject to this Commission's jurisdiction and disposition. In particular, the vast majority of his experience is related to utility-ratemaking and related energy-industry issues. Since the time he joined this Commission's Legal Division in 1978, he has specialized in multi-party, complex regulatory litigation and appeals related to utility results of operations, income taxes, cost of capital, and rate design for energy and telecommunications utilities and, while serving as an advisor to California Public Utilities Commissioner Victor Calvo from 1984 to 1986, was the principal author of several general rate case and ratemaking decisions. His experience includes work on general rate cases and policy matters as in-house counsel for a major California energy utility and as an attorney in one of California's twenty largest law firms, and his expertise in utility ratemaking is further demonstrated by the fact that he has been qualified and has testified as an expert witness on regulatory accounting and ratemaking practices by and before two federal district courts. Mr. Pak was also the principal author and project director for SDG&E's original performance-based ratemaking applications in the early 1990s. This combination of ratemaking and policy experience enabled A4NR to develop and submit the detailed, complex substantive ratemaking recommendations made by A4NR in this proceeding, and his prior trial- and hearing-related experience accumulated during his near-forty years of legal practice before administrative agencies facilitated A4NR's focused and efficient preparation, discovery, testimony, and negotiations during the settlement discussions. Importantly, Mr. Pak's experience provided A4NR with the level of expertise necessary to</p>
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	<p>engage on equal terms the highly experienced senior attorney and plant experts representing PG&E on DCNPP-related issues.</p> <p>A4NR notes that while Resolution ALJ-329 authorized a small adjustment to the range for attorneys with more than thirteen years of experience, Mr. Pak maintained a constant billing rate for his work throughout 2016 and 2017 at the 2015 rate provided in that resolution pursuant to the engagement terms to which he agreed for this proceeding. For the foregoing reasons, A4NR submits that the \$570 hourly rate requested for Mr. Pak is reasonable and that A4NR should be compensated for the time billed to A4NR for his work in this proceeding at that rate.</p>
Comment 2	<p>Hourly Rate for Gwenn O’Hara</p> <p>A4NR requests that the hourly rate for Gwenn O’Hara be established in this proceeding at a rate of \$570 per hour. This is her first proceeding representing a non-profit organization eligible for intervenor compensation and she agreed to represent and has billed A4NR for her services at that rate, which is at the upper end of the range set forth in Resolution ALJ-329 for attorneys with more than twelve years of experience. Ms. O’Hara had been a practicing attorney in California for fifteen years at the time she agreed to represent A4NR in this proceeding.</p> <p>Ms. O’Hara served as litigation counsel during the trial preparation phase of A4NR’s participation in this proceeding. She has extensive experience in the California power markets and has served as counsel to the California Department of Water Resources, Energy Scheduling Division. In this proceeding, she focused on the development of legal theories and discovery strategy supporting A4NR’s recommendations.</p> <p>Ms. O’Hara served as primary counsel for the California Energy Resource Scheduling section of the Department of Water Resources in administration of the agency’s \$40 billion dollar portfolio of energy and gas contracts entered into under AB1X. This representation included coordination and development of utility operating agreements and review and assistance with CERS’ annual revenue requirement process. This experience, along with her expertise in risk analysis related to major infrastructure projects, was applied to help identify ratemaking issues and the deficiencies in PG&E’s analyses of safety risks. Ms. O’Hara has also represented parties, including the California Department of Water Resources and the California Independent System Operator, in matters before the Commission. Ms. O’Hara has over eighteen years of experience and is currently a Shareholder of Buchalter Nemer and the chair of the firm’s Energy</p>

	<p>and Natural Resources Group.</p> <p>A4NR notes that while Resolution ALJ-329 authorized a small adjustment to the range for attorneys with more than thirteen years of experience, Ms. O’Hara maintained a constant billing rate for her work during 2016 at the 2015 rate provided in that resolution pursuant to the engagement terms to which she agreed for this proceeding. For the foregoing reasons, A4NR submits that the \$570 hourly rate requested for Ms. O’Hara is reasonable and that A4NR should be compensated for the time billed to A4NR for her work in this proceeding at that rate.</p>
Comment 3	<p>Hourly Rate for Ann Springgate</p> <p>A4NR requests that the hourly rate for Ann Springgate be established in this proceeding at a rate of \$570 per hour. This is her first proceeding representing a non-profit organization eligible for intervenor compensation and she agreed to represent and has billed A4NR for her services at that rate, which is at the upper end of the range set forth in Resolution ALJ-329 for attorneys with more than twelve years of experience. Ms. Springgate had been a practicing attorney in California for twenty-five years at the time she agreed to represent A4NR in this proceeding.</p> <p>Ms. Springgate served as litigation counsel during the trial preparation phase of A4NR’s participation in this proceeding. She has extensive experience in the California power markets and has served as counsel to various market participants. She also brought her unique experiences to the A4NR litigation team – as lead in-house counsel for the Judicial Branch of California, Administrative Office of the Courts, on a particularly complex construction project, she has expertise in the review and development of risk-weighted cost analyses. In addition, she was a lead attorney with the Federal Emergency Management Agency. In this capacity, she worked on risk-management and disaster-recovery issues, including providing on-ground supervision and legal assistance during recovery efforts for a variety of major disasters, from the World Trade Center to and including Hurricane Katrina. In addition, she also brought her unique experiences as a senior official with the Federal Emergency Management Agency to A4NR’s participation – in this capacity, she worked on risk-management and disaster-recovery issues, which included providing on-ground supervision during the aftermath of the Hurricane Katrina disaster. She applied this unique expertise to identifying the deficiencies in PG&E’s analyses of the safety risks associated with PG&E’s nuclear operations; her analyses were incorporated into A4NR’s showing regarding Schedule DC as method of insulating PG&E’s customers from financial risks arising from safety and/or</p>

	<p>reliability failures at DCNPP.</p> <p>A4NR notes that while Resolution ALJ-329 authorized a small adjustment to the range for attorneys with more than thirteen years of experience, Ms. Springgate maintained a constant billing rate for her work during 2016 at the 2015 rate provided in that resolution pursuant to the engagement terms to which she agreed for this proceeding. For the foregoing reasons, A4NR submits that the \$570 hourly rate requested for Ms. Springgate is reasonable and that A4NR should be compensated for the time billed to A4NR for her work in this proceeding at that rate.</p>
Comment 4	<p>Hourly Rate for Meghan Cox</p> <p>A4NR requests that the hourly rate for Meghan Cox be established in this proceeding at a rate of \$320 per hour. This is her first proceeding representing a non-profit organization eligible for intervenor compensation and she agreed to represent and has billed A4NR for her services at that rate, which is at the upper end of the range set forth in Resolution ALJ-329 for attorneys with five to seven years of experience. Ms. Cox had been a practicing attorney in California for six years at the time she agreed to represent A4NR in this proceeding.</p> <p>Ms. Cox served as litigation counsel during the trial preparation phase of A4NR's participation in this proceeding. She has extensive experience in the California power markets and has served as counsel to various market participants. This representation includes providing advice to the California Department of Water Resources regarding their various revenue requirement proceedings before the Commission. In addition, prior to becoming a lawyer, she served as a Budget Analyst with the California Treasurer's Office, where she was responsible for monitoring , adjusting and seeking variances to budgets set by the State Legislature and the Department of Finance for the numerous boards, commissions and authorities under the Treasurers administrative purview. This unique perspective allowed her to provide advice on certain procedural aspects and policy considerations as well as the value in maintaining different accounts for different items, including the issue of the seismic balancing account. She was responsible for conducting discovery, drafting and serving filings early in the proceeding and the editing of A4NR work products during this proceeding. Importantly, her work in this case allowed A4NR to reduce its costs of participation by assigning certain tasks to a less senior attorney with a lower hourly charge rate.</p> <p>A4NR notes that while Resolution ALJ-329 authorized a small adjustment to the range for attorneys with five to seven years of experience, Ms. Cox maintained a constant billing rate for her work</p>

	<p>during 2016 at the 2015 rate provided in that resolution pursuant to the engagement terms to which she agreed for this proceeding. For the foregoing reasons, A4NR submits that the \$320 hourly rate requested for Ms. Cox is reasonable and that A4NR should be compensated for the time billed to A4NR for her work in this proceeding at that rate.</p>
Comment 5	<p>Hourly Rate for John Geesman</p> <p>Pursuant to D.16-01-033, which specifically allowed a carryover of hours to subsequent proceedings, A4NR is requesting that Mr. Geesman receive his previously approved attorney rate of \$570 per hour for work as A4NR's sole attorney of record in R.14-02-001. This earlier proceeding enabled A4NR to discover PG&E's efforts to qualify DCNPP as a load-following resource, a first for pressurized water reactors in the US, and provided a foundation for A4NR's critique of PG&E's risk assessment methodology as applied to DCNPP. A4NR also requests that expert witness fees for John Geesman be approved based upon an hourly rate of \$420 per hour for this proceeding.</p> <p>In D.14-01-030, the Commission approved an hourly rate for Mr. Geesman at the upper end of the range for attorneys with more than twelve years of experience, including a cost-of-living adjustment, as provided in Resolutions ALJ-267 and ALJ-281. In D.15-11-014, the Commission awarded A4NR intervenor compensation, in part, for hours spent by Mr. Geesman, once again at an hourly rate at the upper end of the range for attorneys with more than twelve years of experience. In this proceeding, he testified as an expert witness supporting A4NR's recommendations related to Schedule DC performance-based ratemaking, the DCNPP Unit 2 stator project, DCNPP-related annual depreciation expense, the retention of the DCNPP seismic studies balancing account, and the disallowance of costs related to the DCNPP ISFSI expansion project. This testimony required the expertise and experience of a highly qualified expert and Mr. Geesman applied his near-forty years of experience as a government official, an industry participant and financial expert to develop and support these recommendations. Consistent with the Commission's prior decisions regarding the hourly rate that should be applied to his participation as an attorney in matters before the Commission, the time Mr. Geesman spent in this proceeding should be compensated at the upper end of the range for experts with more than twelve years of experience, as provided in Resolution ALJ-329.</p> <p>A4NR submits that the \$420 hourly rate requested for Mr. Geesman is reasonable and that A4NR should be compensated for the time billed to A4NR for his appearance as an expert witness in this proceeding at this rate. A4NR further requests that Mr. Geesman's hourly rate be</p>

	adjusted for any applicable cost of living increases as may be applicable to the time for which he is compensated in this proceeding.
Comment 6	<p>Hourly Rate for Resero Consulting (Richard Wolfe and Ellen Wolfe)</p> <p>A4NR requests that expert fees for Resero Consulting (Richard Wolfe and Ellen Wolfe) be approved based upon an hourly rate of \$420 per hour for this proceeding. The requested hourly rates for services provided by Resero Consulting's two experts in this proceeding are consistent with the market rates charged by the firm for similar work and is justified on the years of experience the Resero experts have in the energy industry.</p> <p>Resero Consulting was retained by A4NR to provide expert engineering and nuclear power consulting services to A4NR in this proceeding. Resero Consulting has a national reputation for its expertise in energy and management consulting and specializes in providing expert support to companies and organizations whose critical business issues are affected by wholesale energy markets. The firm provides quantitative and qualitative policy analysis and facilitates and participates in multi-stakeholder processes on behalf of its clients. The firm's clients include the Federal Energy Regulatory Commission, the Public Utility Commission of Texas, the California Independent System Operator, the Western Power Trading Forum, and any number of individual companies who regularly appear before this Commission. In this proceeding, A4NR employed Resero Consulting's two founding and principal consultants, Richard Wolfe and Ellen Wolfe.</p> <p>Richard Wolfe holds a degree in mechanical engineering from California State University at Sacramento. Mr. Wolfe has more than thirty years of experience as an engineer, financial analyst and consultant, and corporate senior manager. His salient experience as a supervisor and licensed nuclear reactor operator was critical to the development of A4NR's testimony regarding the DCNPP Unit 2 main generator stator project and Schedule DC (<i>i.e.</i>, safety- and reliability-related issues arising from PG&E's planned operation of DCNPP as a load-following resource). A4NR further submits that the hourly rate requested for Mr. Wolfe is below the standard hourly rate at which he ordinarily bills his time. A4NR is his only non-profit client eligible for intervenor compensation and he agreed to provide A4NR with his services at a discount in order to give voice to A4NR's concerns regarding the costs of DCNPP operations.</p> <p>Ellen Wolfe holds a Bachelor's degree in Electrical Engineering from the University of California, Davis, and Masters' degrees in</p>

	<p>Management, and Technology and Policy from the Massachusetts Institute of Technology. Ms. Wolfe is a registered Electrical Engineer in the State of California. She has twenty-nine years of experience in the energy industry. She provides expert strategic support to individual clients and works in multi-stakeholder environments performing large studies and policy assessments. Her experience in the Western markets was critical to A4NR's assessment of PG&E's claims with respect to the energy, capacity and flexibility value of DCNPP as well as the costs and benefits of replacement alternatives. Because Ms. Wolfe has never previously served as an expert witness for an intervenor eligible for Commission-approved compensation, she has participated in numerous prior proceedings before this Commission and is well acquainted with the Commission and its jurisdiction.</p> <p>A4NR notes that while Resolution ALJ-329 authorized a small adjustment to the range for experts, Resero Consulting maintained a constant billing rate for their work during 2016 and 2017 at the 2015 rate provided in that resolution pursuant to the engagement terms to which Resero Consulting agreed for this proceeding. For the foregoing reasons, A4NR submits that the \$420 hourly rate requested for consulting services provided by Richard Wolfe and Ellen Wolfe on behalf of Resero Consulting is reasonable and that A4NR should be compensated for the time billed to A4NR for their work in this proceeding at that rate.</p>
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<p>Comment 7</p>	<p>Hourly Rate for Rochelle Becker</p> <p>A4NR requests that the advocate and witness fees for Rochelle Becker be approved based upon an hourly rate of \$140 per hour for this proceeding.</p> <p>In D.14-01-030, the Commission approved an hourly rate for Ms. Becker of \$130 per hour, based upon the rate approved for her contribution to D.13-03-023. In D.15-11-014, the Commission awarded A4NR intervenor compensation, in part, for hours spent by Ms. Becker based upon the rate set in D.14-01-030, with a cost-of-living adjustment, for an hourly rate of \$135 per hour. In this proceeding, Ms. Becker testified as an expert witness supporting A4NR's recommendations related to requiring PG&E to file an annual advice letter detailing the material information affecting PG&E's pursuit of DCNPP license extensions. This testimony required the background and expertise of a person with intimate knowledge of the history associated with PG&E's efforts to seek the DCNPP license extensions and the Commission's prior interest in some of this information. Ms. Becker's background and prior participation on DCNPP-related issues allowed her to present a comprehensive inventory of the information the Commission needed to possess to determine the likelihood PG&E would proceed with the DCNPP license extensions. In light of the contributions Ms. Becker's testimony had on the outcome of this proceeding and the influence her participation and presence had on the timing and substance of PG&E's decision to retire DCNPP, the time Ms. Becker spent in this proceeding should be compensated at the hourly rate requested, based upon her previously approved rate set forth in D.15-11-014.</p> <p>A4NR submits that the \$140 hourly rate requested for Ms. Becker's participation as an expert witness and advocate is reasonable and that A4NR should be compensated for her work in this proceeding at that rate. A4NR further requests that Ms. Becker's hourly rate be adjusted for any applicable cost of living increases as may be applicable to the time for which he is compensated in this proceeding.</p>
<p>Comment 8</p>	<p>Hourly Rate for David Weisman</p> <p>A4NR requests that the advocate fees for David Weisman be approved based upon an hourly rate of \$85 per hour for this proceeding.</p> <p>In D.14-01-030, the Commission approved an hourly rate for Mr. Weisman of \$80 per hour, based upon the rate approved for his contribution to D.13-03-023. In D.15-11-014, the Commission awarded A4NR intervenor compensation, in part, for hours spent by Mr. Weisman based upon the rate set in D.14-01-030, with a cost-of-living adjustment, for an hourly rate of \$85 per hour. In this</p>

	<p>proceeding, Mr. Weisman provided research and analytical support to A4NR's witnesses and attorneys. His work and work products facilitated their efficient and productive work, while having essential research completed at the lower hourly rate applied to Mr. Weisman's time. It should be noted that Mr. Weisman was also prepared to testify as a supporting witness for certain of Mr. Geesman's and Ms. Becker's testimony, in the event either of those witnesses were cross-examined as to the historical bases of their policy testimony regarding PG&E's pursuit of the DCNPP license extensions, the DCNPP seismic studies balancing account, and the Energy Commission's prior recommendations regarding the transfer of spent fuel assemblies to dry cask storage. The research, analysis and support provided by Mr. Weisman required the background and expertise of a person with intimate knowledge of the history associated with PG&E's efforts to seek the DCNPP license extensions and expedite the transfer of spent fuel assemblies to dry cask storage and the State's prior interest in these matters. Mr. Weisman's background and prior participation on DCNPP-related issues before both this Commission and the Energy Commission allowed him to provide timely and efficient research to the witnesses and attorneys on an as needed basis, in addition to providing litigation support to the attorneys as this matter proceeded to settlement and disposition, much in the nature of a paralegal. In light of the contributions Mr. Weisman's work made to A4NR's participation and, ultimately, substantial contributions to D.17-05-013, the time Mr. Weisman spent in this proceeding should be compensated at the hourly rate requested, based upon his previously approved rate set forth in D.15-11-014.</p> <p>A4NR submits that the \$85 hourly rate requested for Mr. Weisman is reasonable and that A4NR should be compensated for his work in this proceeding at that rate. A4NR further requests that Mr. Weisman's hourly rate be adjusted for any applicable cost of living increases as may be applicable to the time for which he is compensated in this proceeding.</p>
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D. CPUC Disallowances and Adjustments:

Item	Reason
[1] John Geesman Hourly Rate	A4NR's statement that D.16-01-033 "specifically allowed a carryover of hours to subsequent proceedings" is not accurate. As explained in Part II, Section A.1 above, Ordering Paragraph 3 of D.16-01-033 stated " <u>If</u> another proceeding assumes Track 1 or Track 2 issues, work performed by an intervenor in Rulemaking 14-02-001 <u>may</u> be considered for intervenor compensation in such other proceeding" (emphasis added). The scope of this proceeding <u>did not</u> incorporate the Track 1 or Track 2

	<p>issues from R.14-02-001. Therefore, pursuant to D.16-01-033 any hours that A4NR carried over from R.14-02-001 are not eligible for compensation in this proceeding. That said, for other issues eligible for compensation where Mr. Geesman performed work in this proceeding as an attorney, that work is compensated at a rate of \$570 per hour (subject to the next item discussed below).</p> <p>A4NR’s claim includes 8.73 hours for John Geesman as an “attorney” at a rate of \$570 per hour, and 96.27 hours as a “policy and financial expert witness” at a rate of \$420 per hour. However, in 2015 Mr. Geesman worked on certain issues for which this decision awards no compensation, but A4NR’s claim does not provide the detail necessary to determine whether those are “attorney” hours or “policy and financial expert witness” hours. Therefore, after deleting all hours claimed by A4NR for its work in R.14-02-001, we compensate all remaining 2015 hours for Mr. Geesman as an “attorney” at a rate of \$570 per hour in compliance with D.18-10-050.</p>
[2] O’Hara, Springgate, and Cox Hourly Rates	<p>A4NR requests an hourly rate of \$570 for O’Hara in 2015.</p> <p>After reviewing O’Hara’s resume, we find the rate of \$570 to be reasonable and reflective of her experience level for work completed in 2015. The rate of \$570 aligns with the rate ranges set by Resolution ALJ-308 and her uninterrupted years of energy- and regulatory-related experience dating to 1998.</p> <p>A4NR requests an hourly rate of \$570 for Springgate in 2015.</p> <p>After reviewing Springgate’s resume, we find a rate of \$320 to be more reasonable and reflective of her experience level for work completed in 2015. The rate of \$320 is at the lower end of the 2015 rate ranges set by Resolution ALJ-308 for attorneys with 13 or more years of experience. As such, this rate accounts for the fact that Springgate’s energy- and regulatory-related experience is less than, for example, O’Hara’s level of experience. It would be unreasonable to approve equal rates for O’Hara and Springgate, because O’Hara’s resume demonstrates a significantly longer period of direct experience in energy- and regulatory-related practice.</p> <p>A4NR requests an hourly rate of \$320 for Cox in 2015.</p> <p>After reviewing Cox’s resume, we find the rate of \$320 reasonable and reflective of her experience level for work completed in 2015.</p>

[3] Transfer of Hours	A4NR relies on D.16-01-033 in R.14-02-001 to support portions of its compensation claim. We find that A4NR’s transfer of those hours to its claim in this proceeding is contrary to the Commission’s direction in D.16-01-033. As demonstrated above, the scope of this proceeding did not include the Track 1 or Track 2 issues from R.14-02-001 for which A4NR seeks compensation. Therefore, the hours claimed by A4NR prior to the start of this proceeding do not warrant compensation as further detailed in Part II.A.
[4] Lack of Substantial Contribution	The Commission found a lack of substantial contribution on the following issues: “T A/L” (Annual Tier 1 Advice Letter), “DC” (Schedule DC Ratemaking Mechanism), and “ADE” (DCNPP Annual Depreciation Expense Reduction). We therefore disallow these hours as detailed in Part II.A.
[5] Public Participation Hours	<p>Public Participation Hearings provide members of the public, who are not parties to the proceeding, an opportunity to address their comments and concerns to the Commission. As such, the Commission does not compensate Intervenor for PPH related hours (<i>See</i> D.04-09-050 at 12). The following hours are disallowed as non-compensable:</p> <ul style="list-style-type: none"> • 1/12/2016 Cox – 0.9 hours Prepare for and attend conference call with CPUC Public Advisor to discuss public participation hearings, draft and circulate summary for client • 4/4/2016 Cox – 0.2 hours Call re: testimony; follow up with Public Advisors office re: public participation hearings • 4/4/2016 Cox – 0.3 hours Follow up with Public Advisors Office re: public participation hearings • 1/1/2016 Geesman – 0.03 hours Correspondence with clients, Al Pak re: public participation hearing in San Luis Obispo • 1/2/2016 Geesman – 0.02 hours Correspondence with clients re: public participation hearing in San Luis Obispo • 1/4/2016 Geesman – 0.08 hours Correspondence with clients re: A4NR presentation at public participation hearing • 1/12/2016 Becker – 0.9 hours CPUC conference call re: public participation hearing schedule and locations • 1/14/2016 Becker – 0.15 hours Review recap of public participation hearing schedule created on 1/12/16 • 3/14/2016 Becker – 0.05 hours Email re public participation hearing schedule re: Review and calendar public participation hearing schedule • 4/6/2016 Becker – 0.1 hours Email chain A4NR team re: dates of public participation hearing schedule

	<ul style="list-style-type: none"> • 5/11/2016 Becker – 0.1 hours Review ALJ public participation hearing schedule • 7/28/2016 Becker – 0.75 hours Travel to public participation hearing SLO • 7/28/2016 Becker – 5.5 hours Attend SLO public participation hearing to hear local concerns and present A4NR issues • 7/28/2016 Becker – 0.75 hours Travel to public participation hearing SLO • 1/1/2016 Weisman – 0.01 hours Review Geesman Email to clients, Al Pak re: public participation hearing in San Luis Obispo • 1/2/2016 Weisman – 0.01 hours Review Geesman Email to clients re: public participation hearing in San Luis Obispo • 1/4/2016 Weisman – 0.01 hours Review Geesman Email to clients re: A4NR presentation at public participation hearing
[6] General Participation	<p>A4NR allocates 22.1% of its total hours in this proceeding under “General Participation.” This is an indeterminate category to which intervenors might allocate a few hours that could not fairly be included in any specific issue-related activity.²⁷ The allocation of 347 hours to this category is excessive given that the other intervenors in this proceeding spent an average of 69.2 hours in this category. Consequently, we reduce A4NR’s hours claimed in this category by 10%.</p>
[7] Travel time	<p>Weismann’s timesheets indicate 16 travel hours in 2016, while 12 hours were notated in the claim. We have adjusted the travel hours allowed, to match the timesheet record.</p>
[8] Printing and copying	<p>A4NR requests \$1,176.26 in printing and copying expenses, of which \$651.27 was to print documents electronically filed and served by PG&E and other parties in the proceeding. Since these documents are accessible electronically, the ratepayers should not be expected to pay for these copies. We allow \$100 of these costs and disallow the remainder \$551.27 for excessiveness. We note that another intervenor in this proceeding with a similarly sized team claimed \$55.15 total in copy expenses.</p> <p>Additionally, the Commission notes that bulk printing rates are available for less than the cost quoted by A4NR. Several options are available for printing at 10 cents per page. Therefore, A4NR’s printing costs have been reduced to reflect current and reasonable pricing.</p>

²⁷ See CPUC Intervenor Compensation Program Guide (April 2017) at 26.

[9] Travel costs	<p>The hours claimed by A4NR prior to the start of this proceeding do not warrant compensation as further detailed in Part II.A. We therefore disallow all travel and associated costs before the start of the proceeding:</p> <ul style="list-style-type: none"> • 4/2/2014 – Airfare – Southwest Airlines (SJC-SAN) BECKER \$171.00 • 4/4/2014 – Train fare – Amtrak (SLO-SJC) WEISMAN \$57.60 • 4/4/2014 – Airfare – Southwest Airlines (SJC-SAN) BECKER \$240.00 • 4/5/2014 – Hotel – Arena Hotel San Jose (SJC) BECKER+WEISMAN \$230.00 • 4/17/2014 – Hotel – Expedia-Hotel San Jose – BECKER \$137.80 • 4/17/2014 – Train fare – Caltrain SJC-SF BECKER (roundtrip) \$18.00 • 5/13/2014 – Airfare – Southwest SAN-SFO roundtrip for BECKER \$262.00 • 6/11/2014 – Hotel – GEESMAN-Best Western San Luis Obispo 1 night \$139.99 <p>Additionally, A4NR included multiple fees associated with flight changes, which the Commission does not find to be a reasonable travel expense. The following flight changes are therefore disallowed:</p> <ul style="list-style-type: none"> • 6/13/16 Pak - \$22.00 change fee • 6/16/16 Pak - \$22.00 change fee • 6/16/16 Becker - \$12.00 change fee • 8/13/16 Pak - \$104.01 change fee
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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))

A. Opposition: Did any party oppose the Claim?	No
B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	No

If not:

Party	Comment	CPUC Discussion
Alliance for Nuclear Responsibility	<p>The PD errs in its analysis between the settlement in this proceeding and the related Joint Proposal for the retirement of the DCNPP addressed in A.16-08-006.</p> <p>The transfer of hours from R.14-02-001 should be based on the docket opposed to the scoping memo.</p> <p>Geesman's hourly rate should be corrected to conform with the approach adopted in D.18-10-050.</p>	<p>The Commission accepted Alliance for Nuclear Responsibility's motion to late file comments. No reply comments were filed.</p> <p>We modify the PD to comply with the intervenor hourly rate approach adopted for Geesman in D.18-10-050 and make no additional changes.</p>

FINDINGS OF FACT

1. Alliance for Nuclear Responsibility has made a substantial contribution to D.17-05-013, as described herein.
2. The requested hourly rates for Alliance for Nuclear Responsibility'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 \$332,448.96.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. Alliance for Nuclear Responsibility shall be awarded \$332,448.96.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company shall pay Alliance for Nuclear Responsibility the total award. 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 September 23, 2017, the 75th day after the filing of Alliance for Nuclear Responsibility's request, and continuing until full payment is made.
3. The comment period for today's decision is not waived.

This decision is effective today.

Dated January 16, 2020, at San Francisco, California.

MARYBEL BATJER

President

LIANE M. RANDOLPH

MARTHA GUZMAN ACEVES

CLIFFORD RECHTSCHAFFEN

GENEVIEVE SHIROMA

Commissioners

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D2002014	Modifies Decision?	No
Contribution Decision:	D1705013		
Proceeding:	A1509001		
Author:	ALJ Division		
Payer:	Pacific Gas and Electric Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Alliance for Nuclear Responsibility (A4NR)	July 10, 2017	\$613,569.32	\$332,448.96	N/A	See CPUC Disallowances and Adjustments, above.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Alvin	Pak	Attorney	A4NR	\$570	2015	\$570
Alvin	Pak	Attorney	A4NR	\$570	2016	\$575
Alvin	Pak	Attorney	A4NR	\$570	2017	\$585
Gwenn	O'Hara	Attorney	A4NR	\$570	2015	\$570
Gwenn	O'Hara	Attorney	A4NR	\$570	2016	\$575
Ann	Springgate	Attorney	A4NR	\$570	2015	\$320
Ann	Springgate	Attorney	A4NR	\$570	2016	\$325
Meghan	Cox	Attorney	A4NR	\$320	2015	\$320
Meghan	Cox	Attorney	A4NR	\$320	2016	\$325
Meghan	Cox	Attorney	A4NR	\$320	2017	\$330
John	Geesman	Attorney	A4NR	\$570	2014	\$570
John	Geesman	Attorney	A4NR	\$570	2015	\$570
John	Geesman	Attorney	A4NR		2016	\$580

John	Geesman	Attorney	A4NR		2017	\$590
John	Geesman	Expert	A4NR	\$420	2015	\$0
John	Geesman	Expert	A4NR	\$420	2016	\$0
John	Geesman	Expert	A4NR	\$420	2017	\$0
Richard	Wolfe	Consultant	A4NR	\$420	2016	\$425
Richard	Wolfe	Consultant	A4NR	\$420	2017	\$435
Ellen	Wolfe	Consultant	A4NR	\$420	2016	\$425
Rochelle	Becker	Advocate	A4NR	\$140	2014	\$140
Rochelle	Becker	Advocate	A4NR	\$140	2015	\$140
Rochelle	Becker	Advocate	A4NR	\$140	2016	\$140
Rochelle	Becker	Advocate	A4NR	\$140	2017	\$145
David	Weisman	Advocate	A4NR	\$85	2014	\$85
David	Weisman	Advocate	A4NR	\$85	2015	\$85
David	Weisman	Advocate	A4NR	\$85	2016	\$85
David	Weisman	Advocate	A4NR	\$85	2017	\$90

(END OF APPENDIX)