

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for Approval of the Retirement of Diablo Canyon Power Plant, Implementation of the Joint Proposal, and Recovery of Associated Costs Through Proposed Ratemaking Mechanisms (U39E)	Application 16-08-006 (Filed August 11, 2016)
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INTERVENOR COMPENSATION CLAIM OF THE ALLIANCE FOR NUCLEAR RESPONSIBILITY AND DECISION ON INTERVENOR COMPENSATION CLAIM OF THE ALLIANCE FOR NUCLEAR RESPONSIBILITY

NOTE: After electronically filing a PDF copy of this Intervenor Compensation Claim (Request), please email the document in an MS WORD and supporting EXCEL spreadsheet to the Intervenor Compensation Program Coordinator at lcompcoordinator@cpuc.ca.gov.

Intervenor: Alliance for Nuclear Responsibility	For contribution to Decision (D.) 18-01-022
Claimed: \$992,050.02	Awarded: \$
Assigned Commissioner: Michael Picker	Assigned ALJ: Peter V. Allen
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
Signature:	/s/ Rochelle Becker
Date: March 15, 2018	Printed Name: Rochelle Becker, Executive Director

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	Decision 18-01-022 approves various provisions of the Joint Proposal pursuant to which Pacific Gas & Electric (“PG&E”) will retire the Diablo Canyon Nuclear Power Plant, most important among them being that DCNPP power operations will cease no later than the dates upon which DCNPP’s existing reactor operating licenses expire.
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	<p>Decision 18-01-022 also approves, in part, those provisions of the Joint Proposal addressing the retraining and relocation of DCNPP employees to other positions within PG&E and an employee-retention program. Decision 18-01-022 also approves a settlement resulting in the exclusion of certain costs PG&E incurred in pursuing DCNPP license extensions from the Nuclear Regulatory Commission from rates and establishing ratemaking procedures for DCNPP capital projects that were approved in prior general rate cases but that may now be subject to cancellation due to the imminent retirement of the plant. Decision 18-01-022 also approves various ratemaking conventions implementing a true-up between forecasted and actual DCNPP capital expenditures and the exclusion of capital expenditures made after June 30, 2016, and all AFUDC accruals related to cancelled DCNPP projects that were previously approved in prior PG&E general rate cases. Finally, Decision 18-01-022 denied the Joint Proposal’s proposed community impacts mitigation program, but preserved the Commission’s ability to consider such a program under specific legislative authorizations or in the event of new facts and circumstances.</p>
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	October 6, 2016	
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	October 31, 2016	
4. Was the NOI timely filed?		
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.16-03-006	
6. Date of ALJ ruling:	July 26, 2016	
7. Based on another CPUC determination (specify):	N/A	
8. Has the Intervenor demonstrated customer status or eligible government entity status?		

Showing of “significant financial hardship” (§1802(h) or §1803.1(b))		
9. Based on ALJ ruling issued in proceeding number:	A.16-03-006	
10. Date of ALJ ruling:	July 26, 2016	
11. Based on another CPUC determination (specify):	N/A	
12. Has the Intervenor demonstrated significant financial hardship?		

Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.18-01-022	
14. Date of issuance of Final Order or Decision:	January 16, 2018	
15. File date of compensation request:	March 15, 2018	
16. Was the request for compensation timely?		

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

#	Intervenor’s Comment(s)	CPUC Discussion
5.	A4NR’s current Articles of Incorporation and Bylaws establishing its customer status were attached to its Notice of Intent to Claim Intervenor Compensation in this proceeding.	

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). (For each contribution, support with specific reference to the record.)

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>1. A4NR was one of several Joint Parties that negotiated the terms and conditions of the Joint Proposal presented in the PG&E application. Notably, as the primary critic of PG&E’s seismic re-evaluation of DCNPP, A4NR agreed in the Joint Proposal to withdraw its pending objections and recommendations regarding PG&E’s recovery of costs in the Diablo Canyon Seismic Studies Balancing Account in PG&E’s 2014 and 2015 ERRA proceedings (A.14-02-008 and A.15-02-023, respectively; PG&E acknowledged in the Joint Proposal’s discussion of seismic issues “the substantial influence and contribution of A4NR’s work in reaching the positions reflected in the Joint Proposal” at Section 5.3). The development and execution of the terms and conditions of the Joint Proposal laid the foundation for PG&E’s decision to retire DCNPP by providing the company with some certainty regarding the manner in which PG&E’s short- and long-term resource plans, employees, community interests, and cost recovery would be resolved.</p> <p>The filing of PG&E’s application was predicated on</p>	<p>A4NR’s contributions to the record regarding, and the Commission’s disposition of, PG&E’s request to retire DCNPP are reflected in <i>Application 16-08-006</i>, at pp.1 to 4, and 7 to 8, and Attachment A (Joint Proposal, at p. 12); also, Decision 16-12-045, at pp. 7 to 8, in Application 14-02-008 (re <i>Joint Motion of Pacific Gas and Electric Company (U 39 E) and the Alliance for Nuclear Responsibility to Set Aside Submission and Reopen the Record Under Rule 13.14</i> (July 27, 2016), and <i>Protest of the Alliance for Nuclear Responsibility</i> (September 14, 2016), at pp.2 to 3); <i>Prepared Direct Testimony of the Alliance for Nuclear Responsibility</i> (Exhibit A4NR-1), at pp.2 to 4; <i>Opening Brief of the Alliance for Nuclear Responsibility</i> (May 26, 2017), at pp.1 to 5; <i>Opening Comments of the Alliance for Nuclear Responsibility on the Proposed Decision of ALJ Allen</i>, at pp.1 to 2; <i>Reply Comments of the Alliance for Nuclear Responsibility re the Proposed Decision of ALJ Allen</i>, at p.1; and, <i>Reporter’s Transcript</i>, at Vol.7, pp.1169 to 1180.</p> <p>Decision 18-01-022 approved DCNPP’s retirement consistent with A4NR’s positions, at pp.3, 6, 9, 15, 57 (Findings 1 and 2), 58 (Conclusion of Law 1), and 59 (Order 1).</p>	

<p>and facilitated by the development and execution of the Joint Proposal by a substantial group considered by PG&E to be key constituencies with an interest in the decision of whether DCNPP should be retired. The sum of the terms and conditions of the Joint Proposal substantially addressed PG&E's operating, resource and ratemaking risks to the point that PG&E was willing to accept the litigation and regulatory risks of prosecuting the Application in their place.</p> <p>Stemming from A4NR's participation in PG&E's 2017 General Rate Case and its critique of PG&E's seismic review in two prior ERRA proceedings (Applications 14-02-008 and 15-02-023), A4NR participated in the negotiations and drafting of the Joint Proposal so as to achieve A4NR's primary objective, both as an organization in general and as one of the Joint Parties specifically: the Commission's approval of the retirement of the DCNPP units at a time no later than the expiry of the plant's reactor operating licenses. Notably, A4NR did not join those provisions of the Joint Proposal related to the acquisition, timing and source of replacement resources and virtually none of the time and costs of the instant request for intervenor compensation reflect costs related to the pursuit of those provisions (see</p>		
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<p>Application 16-08-006, Attachment A (Joint Proposal at Section 2.1, at pp.4 to 5).</p>		
<p>2. A4NR recommended that the Commission approve the funding of employee retention, severance and retraining and relocation programs for members of the existing DCNPP workforce. A4NR participated in the negotiations leading to the proposals for these programs so as to assure that, as DCNPP approached retirement, a sufficient and well-trained workforce remained in place, assuring the safe and reliable operations of the plant, and that provisions for displaced workers were made in order to maintain workforce morale and commitment through the end of DCNPP power operations. As this proceeding progressed, A4NR was particularly insistent that ORA’s opposition to the funding of the earliest retention payments was illogical and would undermine the effectiveness of the entire program.</p> <p>Consistent with the foregoing recommendations submitted by A4NR, Decision 18-01-022 approved the employee retraining and relocation program in whole, provided continuity for the DCNPP employee severance program, including (contrary to the ORA recommendations), the earliest years of the program, and approved substantial funding for the proposed DCNPP employee retention program.</p>	<p>A4NR’s contributions to the record regarding, and the Commission’s disposition of, the DCNPP employee retraining and relocation program, the DCNPP employee severance program, and the DCNPP employee retention program are reflected in <i>Application 16-08-006</i>, at pp.2, 9 to 10, and Attachment A (Joint Proposal); <i>Protest of the Alliance for Nuclear Responsibility</i> (September 14, 2016), at pp.3 and 4; <i>Prepared Direct Testimony of the Alliance for Nuclear Responsibility</i> (Exhibit A4NR-1), at p.5; <i>Prepared Rebuttal Testimony of the Alliance for Nuclear Responsibility</i> (Exhibit A4NR-2), at pp.1 to 2; <i>Opening Brief of the Alliance for Nuclear Responsibility</i> (May 26, 2017), at pp.6 to 8; and, <i>Opening Comments of the Alliance for Nuclear Responsibility on the Proposed Decision of ALJ Allen</i>, at pp.6 to 12.</p> <p>Decision 18-01-022 approved the DCNPP retraining and relocation program, at pp.23 to 24, 58 (Finding 5 and Conclusion of Law 4), and 60 (Order 7).</p> <p>Decision 18-01-022 provided continuity for the DCNPP employee severance program, at p.24.</p> <p>Decision 18-01-022 approved funding of the proposed DCNPP employee retention program, subject to an adjustment of the payment level of 15 percent (as opposed to the 25 percent payment level in the program as proposed), at pp.30, 52 to 53, 58 (Finding 7, which specifically reiterates A4NR’s concern related to the safe and reliable operation of DCNPP during the remaining years of DCNPP power operations), 59 (Finding 6), and 60 (Orders 8 and 9).</p>	

<p>3. A4NR recommended the Commission deny rate recovery for the costs PG&E incurred in the pursuit of DCNPP license extensions. In memorializing its opposition to cost recovery for these activities in the Joint Proposal, A4NR was the first party to raise this issue.</p> <p>Following the close of evidentiary hearings, A4NR initiated settlement discussions with PG&E that later broadened to include other parties. These discussions and negotiations led to the execution and submission of a settlement agreement providing for rate recovery of only those out-of-pocket costs incurred by PG&E prior to April 10, 2011 (the date on which PG&E suspended its application pending before the Nuclear Regulatory Commission), and PG&E’s agreement to waive cost recovery for costs incurred after that date and all AFUDC accruals. This resulted in a reduction to PG&E’s rate request related to license-renewal activities by \$34 million, as well as savings of any interest accruals and charges during the period over which the allowed costs of license renewal will be amortized.</p> <p>The Commission adopted the provisions of the settlement agreement addressing the ratemaking treatment of DCNPP license renewal costs.</p>	<p>A4NR’s contributions to the record regarding, and the Commission’s disposition of, the ratemaking treatment of DCNPP license-renewal costs are reflected in <i>Application 16-08-006</i>, at Attachment A (Joint Proposal Section 5.2 at pp.11 to 12); <i>Protest of the Alliance for Nuclear Responsibility</i> (September 14, 2016), at pp.3 and 5 to 13; <i>Prepared Direct Testimony of the Alliance for Nuclear Responsibility</i> (Exhibit A4NR-1), at pp.6 to 39; <i>Prepared Rebuttal Testimony of the Alliance for Nuclear Responsibility</i> (Exhibit A4NR-2), at pp.6 to 8; <i>Opening Brief of the Alliance for Nuclear Responsibility</i> (May 26, 2017), at pp.13 to 14; <i>Joint Motion of Pacific Gas and Electric Company (U39E), the Alliance for Nuclear Responsibility, etc., for Adoption of Settlement Agreement Regarding License Renewal Project and Cancelled Project Cost Recovery at Diablo Canyon</i> (May 23, 2017), at pp.2 to 3, 15, and Attachment 1 (Settlement Agreement at p.4); <i>Opening Comments of the Alliance for Nuclear Responsibility on the Proposed Decision of ALJ Allen</i>, at pp.2 to 4; <i>Reporter’s Transcript</i>, at Vol.5, pp.821 to 837, Vol.6, pp.846 to 909 and 966 to 988; Vol.7, pp.1102 to 1108, and Vol.8, pp.1195 to 1230; and Cross-Examination Exhibits A4NR-X1 to A4NR-X11 and A4NR-X14 to A4NR-X20.</p> <p>Decision 18-01-022 approved the provisions of the settlement agreement related to DCNPP license-renewal costs, at pp.41 to 45, 47, 58 (Findings 9 and 10), 59 (Conclusions of Law 8 and 11), and 60 (Order 11).</p>	
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<p>4. A4NR entered into a stipulation with PG&E arising from its participation in the PG&E 2018 general rate case. This stipulation prescribed procedures under which rate changes related to DCNPP capital expenditures would be treated. Essentially, these procedures addressed the true-up of forecasted DCNPP capital projects to actual capital expenditures, with corresponding adjustments to DCNPP net plant-in-service, annual depreciation expense, and other capital-related revenue requirements. The A4NR-PG&E Stipulation was augmented by a later settlement agreement to encompass cancelled capital projects specifically. This settlement limits cost recovery for cancelled DCNPP capital projects to 25 percent of PG&E’s capital expenditures incurred after June 30, 2016 (the date the Joint Proposal was executed) and the waiver of cost recovery for any AFUDC accruals associated with a cancelled project.</p>	<p>A4NR’s contributions to the record regarding, and the Commission’s disposition of issues related to, the true-up of DCNPP capital-related revenue requirements and treatment of the costs of cancelled projects are reflected in <i>Application 16-08-006</i>, at pp.11 and 14; Attachment A (Joint Proposal); <i>Prepared Direct Testimony of the Alliance for Nuclear Responsibility</i> (Exhibit A4NR-1), at pp.39 to 41 and Appendix (Stipulation Between PG&E and A4NR Regarding Annual Diablo Canyon Revenue Requirement Tier 3 Advice Letter); <i>Joint Motion of Pacific Gas and Electric Company (U39E), the Alliance for Nuclear Responsibility, etc., for Adoption of Settlement Agreement Regarding License Renewal Project and Cancelled Project Cost Recovery at Diablo Canyon</i> (May 23, 2017), at pp.3, 5, 9 to 10, 15 to 18, and Attachment 1 (Settlement Agreement at pp.3 and 4 to 7); <i>Opening Brief of the Alliance for Nuclear Responsibility</i> (May 26, 2017), at pp.14 to 17; and, <i>Opening Comments of the Alliance for Nuclear Responsibility on the Proposed Decision of ALJ Allen</i>, at pp.4 to 5.</p> <p>Decision 18-01-022 substantially approved the terms of the A4NR-PG&E Stipulation and subsequent settlement agreement related to DCNPP capital expenditures and cancelled projects, subject to modifications as to the timing of the filing of the true-up (<i>i.e.</i>, from annual advice letters to the next PG&E general rate case), at pp.46 to 47, 47 to 48, 58 (Finding 11), 59 (Conclusion of Law 9), and 60 (Order 12).</p>	
<p>5. A4NR recommended the Commission approve the provisions of the Joint Proposal for a Community Impacts</p>	<p>A4NR’s substantial contribution to the order consists of bringing the issue of post-operation impacts on DCNPP’s local community to the Commission’s</p>	

<p>Mitigation Program to address community needs and public programs in the post-DCNPP transition period. A4NR participated in the negotiation and structuring of the program on behalf of its members and for the benefit of the local citizenry. A4NR also participated in the negotiation and execution of a later settlement agreement with various local agencies and political subdivisions that expanded the program.</p> <p>Decision 18-01-022 withheld approval of the Community Impacts Mitigation Program, on the grounds that there was a lack of specific legislative authorization for such approvals (at pp.33, 36 to 41, and 54) and that the program lacked “fairness” (at pp.33 to 36). Although the Commission did not approve the program, Decision 18-01-022 set forth the principle that the Commission would look to legislative authorization for the authority to approve this kind of program (a path A4NR, along with others, is now pursuing with the Commission’s instruction at p.41 in hand) and, important from a legal perspective, that the result was “[b]ased on the specific facts presented” in this proceeding (at pp.33 and 54, footnote 26), which responded to legal arguments submitted by A4NR and others regarding the breadth of the Commission’s ratemaking authority by limiting the</p>	<p>attention, providing for the conduct of the study of such impacts pursuant to legislation for which A4NR was the principal sponsor, and, ultimately, limiting the effect of the Commission’s rejection of the program to the specific facts of this case so as to preserve the reconsideration of the proposed program in the event of future legislation and/or new facts and circumstances that might be developed during the conduct of the Section 712.5 study being supervised by the Commission. These contributions are reflected in Application 16-08-022, at pp.2, and 11 to 1, and Attachment A (Joint Proposal); <i>Protest of the Alliance for Nuclear Responsibility</i> (September 14, 2016), at pp.3 and 4 to 5; <i>Prepared Direct Testimony of the Alliance for Nuclear Responsibility</i> (Exhibit A4NR-1), at pp.5 to 6; <i>Prepared Rebuttal Testimony of the Alliance for Nuclear Responsibility</i> (Exhibit A4NR-2), at p.3 to 6; <i>Joint Motion of Pacific Gas and Electric, the County of San Luis Obispo, etc., and Alliance for Nuclear Responsibility for Adoption of Settlement Agreement</i> (December 28, 2016); <i>Opening Brief of the Alliance for Nuclear Responsibility</i> (May 26, 2017), at pp.8 to 13; <i>Opening Comments of the Alliance for Nuclear Responsibility on the Proposed Decision of ALJ Allen</i>, at pp.12 to 14; and, <i>Reply Comments of the Alliance for Nuclear Responsibility re the Proposed Decision of ALJ Allen</i>, at pp.1 to 4.</p> <p>Decision 18-01-022 denied funding for the program, but did so subject to reservations preserving the Commission’s ability to consider a community impacts program under express legislative authorizations and/or in light of new facts and circumstances that might be developed as part of the Commission’s study of community</p>	
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<p>precedential effects of the Commission’s order for future proposals (e.g., presumably those that may be developed from the studies being conducted under the aegis of Public Utilities Code Section 712.5, the interpretation of which remains a matter of first impression under the Commission’s decision as written (noted at p.32 footnote 17)).</p>	<p>impacts being conducted pursuant to Public Utilities Code Section 712.5, at pp.32 footnote 17, 33, 41, and 54 footnote 26.</p>	
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor’s Assertion	CPUC Discussion
<p>a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?¹</p>	<p>Yes</p>	
<p>b. Were there other parties to the proceeding with positions similar to yours?</p>	<p>Yes</p>	
<p>c. If so, provide name of other parties: The Joint Parties (PG&E, Friends of the Earth, Natural Resources Defense Council, Environment California, International Brotherhood of Electrical Workers Local 1245, and the Coalition of California Utility Employees), the San Luis Obispo Mothers for Peace (“SLOMFP”), The Utility Reform Network (“TURN”), and the Office of Ratepayer Advocates (“ORA”).</p>		
<p>d. Intervenor’s claim of non-duplication:</p> <p>i. A4NR’s Positions in Support of the Joint Proposal:</p> <p>Subject to specific reservations noted in the Application and the Joint Proposal, A4NR was among the Joint Parties supporting the terms and conditions pursuant to which DCNPP would be retired no later than the expiry of the plant’s existing reactor operating licenses. Notably, A4NR did not join in the provisions related to the procurement of replacement resources, thereby avoiding duplication of effort on issues related to the timing and manner in which DCNPP capacity and energy would be replaced. A4NR also specifically reserved the right to contest the recovery of DCNPP license-renewal costs through rates (see below).</p>		

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

Throughout its participation in this proceeding, A4NR coordinated its participation with the other Joint Parties so as to avoid duplication of effort by the members of the group, although in certain instances A4NR felt compelled to submit its own testimony and arguments not embraced by the other Joint Parties.

With respect to the provisions of the Joint Proposal related to the employee retention, severance and retraining/relocation programs, A4NR avoided the duplication of effort by submitting independent factual and policy grounds in support of the program. A4NR's testimony and arguments focused on the relationship between maintaining the existing DCNPP workforce as a matter of plant safety and operational reliability, matters generally not emphasized or even addressed by the other parties. During the discovery phase of the proceeding, A4NR tested, but ultimately did not duplicate, the testimony of the other Joint Parties regarding the structure of these employee programs. Further, A4NR was the only party questioning the logic of the ORA's recommendation to omit funding of the early years of the employee retention program, a position that ultimately prevailed and is reflected in the Commission's approval of the employee retention program, albeit at a level of funding lower than requested in the Application.

With respect to the provisions of the Joint Proposal related to the community impacts mitigation program, A4NR submitted independent factual and policy testimony in support of the program, bringing to light the importance of the continuity of local and public programs important to maintaining employee welfare, emergency services that would be required well beyond the cessation of DCNPP's retirement, and the experience of other communities affected by the closure of nearby nuclear generating plants. A4NR also addressed the legal authority of the Commission to approve the community impacts mitigation program from its perspective as the principal sponsor of the legislation resulting in the codification of Public Utilities Code Section 712.5. Although the Commission did not approve the proposed program, the Commission adopted language positioning it to review such a program under the auspices of specific legislative authorizations and/or facts and circumstances that might be developed during the course of its ongoing study of the community impacts expected from DCNPP's retirement.

ii. Rate Recovery of License-Renewal Costs

A4NR was the first party to oppose rate recovery for PG&E's license-renewal costs, a position memorialized in the Joint Proposal. From there, A4NR coordinated its showing on this issue with both ORA and TURN, sharing preliminary drafts of its Protest and opening direct testimony with those parties so as to reduce the likelihood that there would be duplicative effort on this issue. A4NR also shared its draft testimony with the San Luis Obispo Mothers for Peace ("SLOMFP"), which led to the filing of joint testimony by A4NR and SLOMFP on license-renewal issues. A4NR

<p>was the party that initiated settlement discussions with PG&E on this issue, and fully participated in the negotiations and execution of the settlement agreement that was adopted by the Commission.</p> <p>TURN’s opposition to rate recovery for PG&E’s license-renewal costs was similar, but not entirely congruent, with A4NR’s testimony and arguments. In particular, A4NR emphasized the historical precursors and statutory precedents A4NR believed precluded cost recovery of these costs, and presented expert legal testimony on these matters that went beyond the expertise of TURN’s subject matter expert. In addition, A4NR submitted additional substantive grounds regarding the reasonableness of PG&E’s decision to file its application to extend the DCNPP reactor operating licenses with the Nuclear Regulatory Commission; these grounds included, but are not limited to, issues related to faults in the economic analyses upon which PG&E based its decision to seek these license extensions and the reliability and economic issues posed by DCNPP’s seismic setting, issues also at bar in Applications 14-02-008 and 15-02-023 (PG&E’s 2014 and 2015 ERRA proceedings). While A4NR and TURN reached the same conclusions and presented similar recommendations, A4NR and TURN coordinated their evidentiary showings and presented independent grounds in support of their positions, and the record does not evidence much in the way of duplicative substantive efforts.</p> <p>iii. Treatment of DCNPP Capital Projects and Cancelled Projects</p> <p>The ratemaking treatment of DCNPP capital expenditures and the waiver of rate recovery for a substantial portion of DCNPP cancelled projects were issues originally and uniquely raised by A4NR, first as part of the PG&E-A4NR Stipulation addressing the true-up of capital expenditures stemming from PG&E’s 2018 General Rate Case and later as party to settlement discussions which encompassed the treatment of cancelled projects and which were included as part of the settlement on license-renewal costs. A4NR’s leadership on these ratemaking issues obviated the need for other parties to do much other than to follow A4NR’s ratemaking lead.</p>	
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C. Additional Comments on Part II (use line reference # or letter as appropriate):

#	Intervenor’s Comment	CPUC Discussion
A.	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	

	<p>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 A4NR’s four expert and percipient witnesses, addresses the recommendations enumerated as substantial contributions “1”, “2”, “3”, “4”, and “5”, and was received into the evidentiary record of this proceeding;</p> <p><i>Exhibit A4NR-2</i>, comprising the rebuttal testimony of two of A4NR’s policy witnesses, and addresses recommendations enumerated as substantial contributions “2” and “5” above, was received into the evidentiary record of this proceeding;</p> <p><i>Cross-Examination Exhibits A4NR-X1 through X20</i>, reflect the extent and focus of A4NR’s discovery and preparation efforts, and each was received into the evidentiary record of this proceeding;</p> <p><i>Joint Motion of Pacific Gas and Electric Company (U39E), the Alliance for Nuclear Responsibility, etc., for Adoption of Settlement Agreement Regarding License Renewal Project and Cancelled Project Cost Recovery at Diablo Canyon (May 23, 2017)</i>, which A4NR negotiated and executed with various parties and resulted in orders identified in substantial contributions “3” and “4”;</p>	
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<p><i>Joint Motion of Pacific Gas and Electric, the County of San Luis Obispo, etc., and Alliance for Nuclear Responsibility for Adoption of Settlement Agreement (December 28, 2016), which A4NR negotiated and executed with various parties and laid the foundation for the provisions of Decision 18-01-022 identified in substantial contribution “5”; and,</i></p> <p>The various pleadings, briefs and comments filed by A4NR, all of which contributed to the substantial contributions made by A4NR to the disposition of the issues raised in this proceeding.</p> <p>Additionally, pursuant to the seismic studies provisions of the Joint Proposal, A4NR agreed to withdraw material contributions to the records of Application 15-02-023, as documented in Decision 16-12-045, and Application 14-02-008 (decision pending). In both instances, PG&E has acknowledged “the substantial influence and contribution of A4NR’s work in reaching the positions reflected in the Joint Proposal.”</p>	
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PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

<p>a. Intervenor’s claim of cost reasonableness – Substantial Contributions to the Outcomes of this Proceeding</p> <p>As stated above, A4NR is informed and believes that its participation in the development, negotiation and execution of the Joint Proposal 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</p>	<p style="text-align: center;">CPUC Discussion</p> <hr/>
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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.

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, A4NR's substantial contributions to the disposition of the issues as adopted in Decision 18-01-022 will result in the following impacts:

1. The employee retention program as modified by the Commission will increase the likelihood that a substantial proportion of the existing DCNPP workforce will remain in place through the end of the period of DCNPP power operations, which in turn increases the probability that DCNPP operations will be safe and reliable for as long as the plant remains in service;
2. The adoption of the settlement agreement regarding the rate recovery of PG&E's license-renewal costs will result in a savings of \$34 million as compared to PG&E's requested rate relief;
3. The adoption of the true-up of forecasted DCNPP capital expenditures to actual capital expenditures will result in the lowest reasonable rates;
4. The adoption of the settlement agreement related to cancelled DCNPP capital projects will result in substantial cost savings to PG&E customers; and,
5. The holdings in Decision 18-01-022, despite the rejection of the proposed community impacts mitigation program, provide for the future reconsideration of such a program in the event of specific legislative authorizations and/or the development of facts and circumstances in the Commission's ongoing study of community impacts resulting from DCNPP's retirement.

The effects of the foregoing results are many orders of magnitude greater than the costs of A4NR's participation in this proceeding submitted in this request for intervenor compensation.

Reasonableness of Staffing:

The foregoing results were achieved by the assembly and work of a team of lawyers and 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. A4NR's request for compensation reflects time spent across a period of one and a half years, and additional time spent in two prior PG&E ERRA proceedings involving issues related to DCNPP's seismic setting.

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, the California Energy 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 DCNPP's retirement and support of the provisions of the Joint Proposal;
- 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 policy and ratemaking witness for A4NR in this proceeding and sole A4NR attorney in the related seismic study proceedings, Applications 15-02-023 and 14-02-008, and directed the preparation of the detailed regulatory, ratemaking and engineering analyses presented in the bulk of A4NR's testimony. 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 reasonableness of PG&E's efforts to extend the DCNPP reactor operating licenses;

- 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 studies upon which the company relied in launching and continuing its efforts to extend the reactor operating licenses, particularly as to PG&E's assumptions related to alternative resources and replacement costs;
- 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 reputation as an expert consultant on wholesale power markets and economic and financial modeling;
- 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 developing and/or managing A4NR's litigation strategy, evidentiary showing and legal positions, assigning tasks to the A4NR team, and conducting 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 holding company and 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, and brought this expertise to bear on the issues related to PG&E's license-renewal costs, the capital expenditure true-up, and the treatment of costs related to cancelled projects; and,

- David Weisman is a 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. Due to this unique knowledge and his understanding of regulatory policy, he provided testimony related to the community impacts mitigation program and expert and efficient litigation support to A4NR's attorney and witnesses by performing regulatory-legal and factual research in support of their work and participation regarding PG&E's efforts to extend the DCNPP reactor operating licenses. 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 noted above, 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, A4NR's 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 both in California and before the Nuclear Regulatory Commission, 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, (b) settlement meetings involving the other parties, particularly face-to-face negotiations with PG&E, and (c) 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 described in (b) and (c) by teleconference so as to limit travel expenses. A4NR is also waiving any claim for travel time of its

<p>principal attorney per the terms of the engagement agreement between its attorney and A4NR. 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.</p> <p>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 as required by the Commission's rules are included in Attachment 4.</p> <p>A4NR also notes that costs associated with legal research, <i>e.g.</i>, 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.</p> <p><u>Hours Spent on this Compensation Request:</u></p> <p>A4NR is also claiming 31.32 hours spent in the preparation of this claim for intervenor compensation. Given the length of this proceeding and the related seismic studies proceedings, as well as the extensiveness of the records reviewed and provided in support of this claim, 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 and billing rates. 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. Further, 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>	

c. Allocation of hours by issue:

A4NR allocated its claimed hours to the five substantial contributions for which it seeks intervenor compensation. The abbreviations noted below are used in the Attachments to this Request as codes for the hours and expenses incurred by A4NR for each specific issue and contribution. Certain hours spent in general preparation for A4NR's participation in this proceeding (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.

A4NR used the following codes to allocate its hours across the issues it presented in this proceeding (see Attachment 3):

“DCR” (Diablo Canyon Retirement) – 18.7% of total (246.16 hours)

These hourly charges are related to A4NR's contribution to PG&E's request for authority to retire DCNPP no later than the expiry of the plant's reactor operating licenses. This includes time spent participating the negotiations that led to the execution of the Joint Proposal;

“EEP” (Employee Retention, Severance and Retraining/Relocation Programs) – 4.5% of total (59.18 hours)

These hourly charges are related to A4NR's support of the provisions of the Joint Proposal provisions proposing programs addressing employee retention, employee severance packages, and employee retraining and relocation costs;

“LRC” (License Renewal Costs) – 37.4% of total (490.71 hours)

These hourly charges are related to A4NR's opposition to those provisions of the Joint Proposal requesting rate recovery for PG&E's costs of pursuing the DCNPP license extensions before the Nuclear Regulatory Commission. These charges also include the costs of negotiating and supporting the settlement agreement related to this issue;

“CAP” (Capital Expenditure True-Up and Cancelled Projects) – 6.1 % (80.53 hours)

These hourly charges are related to A4NR's contribution to the ratemaking conventions adopted for DCNPP capital expenditures and cancelled projects. These charges include A4NR's time spent in negotiating and executing the PG&E-A4NR Stipulation and the settlement agreement addressing these matters;

<p>“CIMP (Community Impacts Mitigation Program) – 8.2% (107.16 hours)</p> <p>These hourly charges are related to A4NR’s support of the Joint Proposal program proposing to address the potential adverse impacts local communities are expected to suffer as a direct result of DCNPP’s retirement;</p> <p>“GP” (Time Spent in Necessary Preparation for A4NR’s Effective Participation but Not Related to any Specific or Single Issue) – 25.1% of total (329.45 hours)</p> <p>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 (<i>e.g.</i>, attendance at the prehearing conference and public participation hearings, except that no time is charged for the nonproductive travel time of A4NR’s attorney per the terms of his engagement with A4NR); travel time is claimed at half the otherwise requested hourly rate and amounts to 207.79 hours out of a total 329.45 hours allocated to this category.</p>	
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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	2016	139.2	\$575	Resolution ALJ-345 (see Comment 1 below and Attachment 5)	80,040.00			
Alvin Pak, attorney	2017	271.1	\$585	Resolution ALJ-345 (see Comment 1 below and Attachment 5)	158,593.50			

Alvin Pak, attorney	2018	3.8	\$585	Resolution ALJ-345 (see Comment 1 below and Attachment 5)	2,223.00			
John Geesman Attorney (A.14-02- 008)	2014	288.82	\$570	Decision 15- 11-014 and Resolution ALJ-345 (see Comment 7 below)	164,627.40			
John Geesman Attorney (A.15-02- 023)	2014	31.76	\$570	Decision 15- 11-014 and Resolution ALJ-345 (see Comment 7 below)	18,103.20			
John Geesman Attorney (A.14-02- 008)	2015	.35	\$570	Decision 15- 11-014 and Resolution ALJ-345 (see Comment 7 below)	199.50			
John Geesman Attorney (A15-02- 023)	2015	399.56	\$570	Decision 15- 11-014 and Resolution ALJ-345 (see Comment 7 below)	227,749.20			
John Geesman Attorney (A.14-02- 008)	2016	0.2	\$580	Decision 17- 11-027 (see Comment 7 below)	116.00			
John Geesman Attorney	2016	53.48	\$580	Decision 17- 11-027 (see Comment 2 below)	31,018.40			
John Geesman Attorney	2017	14.46	\$590	Decision 17- 11-027 (see Comment 2 below)	8,531.40			

John Geesman, policy and financial expert witness	2016	52.31	\$425	Decision 17-11-027 and Resolution ALJ-345 (see Comment 2 below)	22,231.75			
John Geesman, policy and financial expert	2017	31.34	\$435	Decision 17-11-027 and Resolution ALJ-345 (see Comment 2 below)	13,632.90			
John Geesman, policy and financial expert	2018	.78	\$435	Decision 17-11-027 and Resolution ALJ-345 (see Comment 2 below)	339.30			
Richard Wolfe, engineering consultant	2016	77.42	\$425	Resolution ALJ-345 (see Comment 6 below and Attachment 6)	32,903.50			
Richard Wolfe, engineering consultant	2017	67.70	\$435	Resolution ALJ-345 (see Comment 3 below and Attachment 6)	29,449.50			
Ellen Wolfe, economic consultant	2016	2.45	\$425	Resolution ALJ-345 (see Comment 3 below and Attachment 7)	1,041.25			
Dr. Douglas Hamilton, Geologic Consultant (A.14-02-008)	2014	74	\$250	Decision 12-09-008 and Resolution ALJ 281 (see Comments 6 and 7 below)	18,500.00			

Dr. Douglas Hamilton, Geologic Consultant (A.15-02-023)	2014	28	\$250	Decision 12-09-008 and Resolution ALJ 281 (see Comments 6 and 7 below)	7,000.00			
Dr. Douglas Hamilton, Geologic Consultant (A.15-02-023)	2015	44	\$250	Decision 12-09-008 and Resolution ALJ 281 (see Comment 7)	11,000.00			
Rochelle Becker, expert witness and advocate (A.14-02-008)	2014	44.18	\$140	Decision 15-11-014 and Resolution ALJ-345 (see Comments 4 and 6 below)	6185.20			
Rochelle Becker, expert witness and advocate (A.15-02-023)	2014	4.8	\$140	Decision 15-11-014 and Resolution ALJ-345 (see Comments 4 and 7 below)	672.00			
Rochelle Becker, expert witness and advocate (A.15-02-023)	2015	64.28	\$140	Decision 15-11-014 and Resolution ALJ-345 (see Comments 4 and 7 below)	8,999.20			
Rochelle Becker, expert witness and advocate	2016	77.86	\$140	Decision 15-11-014 and Resolution ALJ-345 (see Comment 4 below)	10,900.40			
Rochelle Becker, expert	2017	90.91	\$145	Decision 17-11-027 and Resolution ALJ-345 (see	13,181.95			

witness and advocate				Comment 4 below)				
Rochelle Becker, expert witness and advocate	2018	3.7	\$145	Decision 17-11-027 and Resolution ALJ-345 (see Comment 4 below)	536.50			
David Weisman, advocate (A.14-02-008)	2014	106.21	\$85	Decision 15-11-014 and Resolution ALJ-345 (see Comments 5 and 7 below)	9027.85			
David Weisman, advocate (A.15-02-023)	2014	35.25	\$85	Decision 15-11-014 and Resolution ALJ-345 (see Comments 5 and 7 below)	2996.25			
David Weisman, advocate (A.15-02-023)	2015	125.16	\$85	Decision 15-11-014 and Resolution ALJ-345 (see Comments 5 and 7 below)	10,638.60			
David Weisman, expert witness and advocate	2016	57.78	\$125	Decision 15-11-014 and Resolution ALJ-345 (see Comment 5 below)	7,222.50			
David Weisman, expert witness and advocate	2017	134.3	\$130	Decision 15-11-014 and Resolution ALJ-345 (see Comment 5 below)	17,459.00			

David Weisman, expert witness and advocate	2018	3.55	\$130	Decision 15-11-014 and Resolution ALJ-345 (see Comment 5 below)	461.50			
Subtotal: \$915,580.75						Subtotal: \$		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
John Geesman, Attorney (travel time at half of hourly rate)	2017	11.00	295	Decision 17-11-027 (see Comment 2 below)	3,245.00			
John Geesman, Attorney (travel time at half of hourly rate)	2016	11.50	290	Decision 17-11-027 (see Comment 2 below)	3,335.00			
John Geesman, Attorney (travel time at half of hourly rate) (A.15-02-023)	2015	22.00	285	Decision 15-11-014 and Resolution ALJ-345 (see Comment 7 below)	6,270.00			
John Geesman, Attorney (travel time at half of hourly rate) (A.14-02-008)	2014	8.00	285	Decision 15-11-014 and Resolution ALJ-345 (see Comment 7 below)	2,280.00			

John Geesman, policy and financial expert (travel time at half of hourly rate)	2016	7.14	212.50	Decision 15-11-014 and Resolution ALJ-345 (see Comment 2 below)	1,517.25			
Richard Wolfe, Engineering Consultant (travel time at half of hourly rate)	2016	15.0	212.50	Resolution ALJ-345 (see Comment 3 below and Attachment 6)	3,187.50			
Richard Wolfe, Engineering Consultant (travel time at half of hourly rate)	2017	14.5	217.5	Resolution ALJ-345 (see Comment 3 below and Attachment 6)	3,153.75			
Rochelle Becker, Advocate (travel time at half of hourly rate) (A.14-02-008)	2014	1.5	\$70	Decision 15-11-014 and Resolution ALJ-329 (see Comment 4 below)	105.00			
Rochelle Becker, Advocate (travel time at half of hourly rate) (A.15-02-023)	2015	12	70	Decision 15-11-014 and Resolution ALJ-329 (see Comment 4 below)	840.00			
Rochelle Becker, advocate (travel time at half of hourly rate)	2016	54.65	\$70	Decision 17-11-027 and Resolution ALJ-345 (see Comment 4 below)	3825.50			

Rochelle Becker, advocate (travel time at half of hourly rate)	2017	42.5	\$72.50	Decision 17-11-027 and Resolution ALJ-345 (see Comment 4 below)	3081.25			
David Weisman, advocate (travel time at half of hourly rate) (A.14-02-008)	2014	15	\$42.50	Decision 15-11-014 and Resolution ALJ-345 (see Comments 5 and 7 below)	637.50			
David Weisman, advocate (travel time at half of hourly rate) (A.15-02-023)	2014	3.5	\$42.50	Decision 15-11-014 and Resolution ALJ-345 (see Comments 5 and 7 below)	148.75			
David Weisman, advocate (travel time at half of hourly rate) (A.15-02-023)	2015	21.0	\$42.50	Decision 15-11-014 and Resolution ALJ-345 (see Comments 5 and 7 below)	892.50			
David Weisman, advocate (travel time at half of hourly rate)	2016	16.0	\$62.50	Decision 15-11-014 and Resolution ALJ-345 (see Comment 5 below)	1000.00			
David Weisman, advocate (travel time at half of hourly rate)	2017	35.5	\$65.00	Decision 15-11-014 and Resolution ALJ-345 (see Comment 5 below)	2,307.50			
Subtotal: \$35,826.50						Subtotal: \$		

INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Alvin Pak (at half of hourly rate)	2018	13.7	\$292.50	Resolution ALJ-345 (see Comment 1 below and Attachment 5)	4,007.25			
John Geesman (at half of hourly rate)	2018	4.20	\$295.00	Decision 15-11-014 and Resolution ALJ-345 (see Comment 2 below)	1,239.00			
John Geesman (at half of hourly rate) (A.15-02-023)	2015	.67	\$235	Decision 15-11-014 and Resolution ALJ-345; see Comment 7 below	157.45			
John Geesman (at half of hourly rate) (A.14-02-008)	2014	.67	\$235	Decision 15-11-014 and Resolution ALJ-345; see Comment 6 below	157.45			
Richard Wolfe (at half of hourly rate)	2018	4.75	\$217.50	Resolution ALJ-345 (see Comment 3 below and Attachment 6)	1,033.13			
Rochelle Becker (at half of hourly rate)	2018	2.0	\$72.5	Decision 17-11-027 and Resolution ALJ-345 (see Comment 4 below)	145.00			

David Weisman (at half of hourly rate)	2018	6.0	\$65	Decision 15-11-014 and Resolution ALJ-345 (see Comment 5 below)	390.00			
Subtotal: \$7,129.28						Subtotal: \$		
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)			\$1,106.85			
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)			\$45.27			
3.	Travel	Airfare, hotel, transportation, mileage, and parking charges (see itemization in Attachment 4; receipts included for individual items over \$20)			\$19,354.56			
3A.	Travel	Transportation and lodging for A.14-02-008 and A.15-02-023 (receipts included in Attachment 4 and itemized in Attachment 4A)			\$3,576.81			
4.	Nextpoint data base services	Optical scanning to facilitate search of 39 GB PG&E discovery responses in A.15-02-023 (see Comment 7 below, and receipts included in Attachment 4 and itemization in Attachment 4A)			\$9,430.00			
TOTAL REQUEST: \$33,513.49						TOTAL AWARD: \$		

*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' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate

ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR²	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Alvin S. Pak	May 31, 1979	85502	No
John Geesman	June 28, 1977	74448	No

**C. Attachments Documenting Specific Claim and Comments on Part III
(Intervenor completes; 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 18-01-022
Attachment 3 Appendix	Appendix for A.14-02-008 and A.15-02-023: Time Sheet Records with Allocation of Hours by Issue
Attachment 4	Cost and Expense Records (with receipts for individual expenses exceeding \$20)
Attachment 4A	Cost and Expense Records for A.14-02-008 and A.15-02-023 (with receipts for individual expenses exceeding \$20 in Attachment 4)
Attachment 5	Resumé of Alvin S. Pak
Attachment 6	Resumé of Richard Wolfe
Attachment 7	Resumé of Ellen Wolfe
Comment 1	Hourly Rate for Alvin S. Pak:

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

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 \$575 per hour for 2016 and \$585 per hour for 2017 and 2018. Although the Commission has not previously established an hourly rate for Mr. Pak, as this is only his second proceeding representing a non-profit organization eligible for intervenor compensation (compensation request in prior proceeding remains pending in Application 15-09-001), 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 Resolutions ALJ-329 and ALJ-345 for attorneys with more than 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.

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.

A4NR submits that the requested hourly rate for Mr. Pak is justified based upon his almost forty 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

	<p>necessary to engage on equal terms the highly experienced senior attorney and plant experts representing PG&E on DCNPP-related issues.</p>
<p>Comment 2</p>	<p>Hourly Rate for John Geesman</p> <p>In Decision 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 Decision 17-11-027, the Commission recently approved hourly rates for Mr. Geesman of \$580 for 2016 hours and \$590 for 2017 hours. A4NR is requesting that the hours spent by Mr. Geesman in his role as a lawyer for A4NR in 2016, 2017 and 2018 be compensated at these rates.</p> <p>In this proceeding, Mr. Geesman also testified as an expert witness supporting A4NR’s recommendations related to the exclusion of the DCNPP license renewal costs from rates on various technical and policy grounds. 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 A4NR’s 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 an hourly rate of \$425 in 2016 and \$435 in 2017, the upper end of the range for experts with more than twelve years of experience as provided in Resolution ALJ-345. A4NR further requests that Mr. Geesman’s hourly rate be adjusted for any applicable cost of living increases as may be applicable to the time in 2018 for which he is compensated in this proceeding.</p>
<p>Comment 3</p>	<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 \$425 per hour for hours spent in 2016 and \$435 per hour for hours spent in 2017 and 2018 on 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 based on the schedule of hourly rates adopted by the Commission in Resolution ALJ-345 for experts with comparable experience.</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</p>

	<p>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 studies upon which PG&E relied in launching and continuing its activities related to the extension of the DCNPP reactor operating licenses. 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 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. Although 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 is requesting that the hours spent by the Resero experts be compensated at an hourly rate of \$425 for 2016 and \$435 for 2017 and 2018, the rate at the upper end of the range for expert consultants with more than twelve years of experience as provided in Resolution ALJ-345. A4NR further requests that this hourly rate be adjusted for any applicable cost of living increases as may be applicable to the time for which the Resero experts are compensated in this proceeding.</p>
<p>Comment 4</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 hours spent in 2016 and \$145 per hour for hours spent in 2017 and 2018 on this proceeding.</p> <p>In Decision 17-11-027, the Commission recently approved hourly rates for Ms. Becker of \$140 for 2016 hours and \$145 for 2017 hours. In this proceeding, Ms. Becker testified as an expert witness supporting A4NR’s support of the Joint Proposal and its recommendations related to the exclusion of PG&E’s costs of launching and pursuing</p>

	<p>the extension of the DCNPP reactor operating licenses. 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 consideration of those activities. 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 rates set forth in Decision 17-11-027.</p> <p>A4NR submits that the \$140 hourly rate for 2016 and \$145 hourly rate for 2017 and 2018 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 in 2018 for which she is compensated in this proceeding.</p>
<p>Comment 5</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 \$125 per hour for hours spent in 2016 and \$130 per hour for hours spent in 2017 and 2018 on this proceeding.</p> <p>In Decision 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 Decision 13-03-023. In Decision 15-11-014, the Commission awarded A4NR intervenor compensation, in part, for hours spent by Mr. Weisman based upon the rate set in Decision 14-01-030, with a cost-of-living adjustment, for an hourly rate of \$85 per hour. In this proceeding, Mr. Weisman provided expert testimony in addition to performing duties related to providing research and analytical support to A4NR’s witnesses and attorneys as was the case in his prior work before the Commission. His work and work products are reflected in A4NR’s testimony and, with specific attribution, A4NR’ rebuttal testimony.</p> <p>Mr. Weisman’s testimony supported A4NR’s recommendations related to the community impact mitigation program proposal and in support of certain of Mr. Geesman’s and Ms. Becker’s testimony related to the historical bases of their policy testimony regarding PG&E’s pursuit of the DCNPP license extensions. The research, analysis and support provided by Mr. Weisman required the background and expertise of a person with intimate knowledge of the decades-long history associated with PG&E’s efforts to seek the DCNPP license extensions 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 this informed testimony. And, as always, Mr. Weisman’s participation facilitated the efficient and productive work of A4NR’s lawyers and other experts. Having essential research completed at the lower hourly rate applied to Mr. Weisman’s time resulted in a more efficient cost of participation by A4NR. In light of the</p>

	<p>contributions Mr. Weisman’s work made to A4NR’s participation and, ultimately, substantial contributions to Decision 18-01-022, the time Mr. Weisman spent in this proceeding should be compensated at the hourly rate of \$125 for 2016, and \$130 for 2017 and 2018, the rates set forth in Resolution ALJ-345 for an expert witness appearing for the first time, although should the Commission determine that his substantial experience before the Commission in other capacities qualify his work for a higher hourly rate than requested, A4NR requests the Commission compensate A4NR for Mr. Weisman’s time at a rate the Commission determines is more reasonable than the rate requested.</p>
<p>Comment 6:</p>	<p>Hourly Rate for Dr. Douglas Hamilton</p> <p>Dr. Douglas Hamilton’s academic qualifications include BS, MS, and Ph.D degrees, all from Stanford University, and more than fifty years of professional experience in engineering and seismic geology. During his career he has worked on electric generation projects involving some 7600 MW of installed capacity. Dr. Hamilton holds California Professional Geologist license No. 56 and is Certified Engineering Geologist No. 31. Both of these licenses were obtained in 1970. In addition, since 2001, Hamilton holds a Washington Professional Geologist and Engineering Geologist license No. 1710. Hamilton’s commercial billing rate for A4NR is \$250 per hour, which is within the range for experts with 13+ years of experience (See Resolution ALJ-281). In D. 12-09-008 the rate of \$225 per hour was adopted for work Hamilton completed in 2012. With the application of COLA adjustment in the ensuing years, Dr. Hamilton’s current consulting rate of \$250 can be justified.</p>
<p>Comment 7: Claims Related to PG&E ERRA proceedings (A.14-02-008 and A.15-02-023)</p>	<p>As memorialized in the seismic studies provisions of the Joint Proposal, A4NR agreed to withdraw its pending recommendations and material contributions to the evidentiary records of Applications 14-02-008 and 15-02-023 on these issues, as documented in Decision 16-12-045. In a Joint Motion filed in Application 15-02-023, PG&E and A4NR agreed that A4NR’s recommendations and evidence on seismic issues should be withdrawn, along with related evidence provided by PG&E, so that PG&E and A4NR could proceed to execute the Joint Proposal that led to the filing of Application 16-08-006. The Commission granted the motion and the PG&E-A4NR agreement reached with respect to the contested issues pending in Applications 14-02-008 and 15-02-023 are referenced in and memorialized by Section 5.3 of the Joint Proposal related to seismic safety issues, where PG&E acknowledged “the substantial influence and contribution of A4NR’s work in reaching the positions reflected in the Joint Proposal.” A4NR’s interventions in the two PG&E ERRA proceedings included in this request for compensation raised issues contesting PG&E’s recovery of funds from the Seismic Studies Balancing Account due to: PG&E’s systematic circumvention of review by the Commission’s Independent Peer Review Panel; PG&E’s misrepresentation of the risks posed by the Shoreline Fault, including its potential joint rupture with the Hosgri Fault; PG&E’s inadequate attention to other seismic risks necessary to establish consistency with the Coastal Zone Management Act; and, in A.15-02-023, PG&E’s mischaracterization of ground motion response at the Diablo Canyon site.</p>

D. CPUC Disallowances and Adjustments (CPUC completes):

Item	Reason

PART IV: OPPOSITIONS AND COMMENTS

Within 30 days after service of this Claim, Commission Staff or any other party may file a response to the Claim (*see* § 1804(c))

(CPUC completes the remainder of this form)

A. Opposition: Did any party oppose the Claim?	
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If so:

Party	Reason for Opposition	CPUC Discussion

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

Party	Comment	CPUC Discussion

FINDINGS OF FACT

1. Intervenor [has/has not] made a substantial contribution to D._____.
2. The requested hourly rates for Intervenor’s representatives [as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.

3. The claimed costs and expenses [,as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$_____.

CONCLUSION OF LAW

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

ORDER

1. Intervenor is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay Intervenor the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay Intervenor their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated.”] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75th day after the filing of Intervenor’s request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.