



STATE OF CALIFORNIA

GAVIN NEWSOM, Governor

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

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April 8, 2025

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TO PARTIES OF RECORD IN RULEMAKING 20-01-007:

This is the proposed decision of Administrative Law Judge (ALJ) David Van Dyken and ALJ Robyn Purchia. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's May 15, 2025 Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties to the proceeding may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure. Electronic copies of comments should also be sent to the Intervenor Compensation Program at icompcoordinator@cpuc.ca.gov.

/s/ MICHELLE COOKE

Michelle Cooke

Chief Administrative Law Judge

MLC:nd3

Attachment

Decision **PROPOSED DECISION OF ALJ VAN DYKEN AND ALJ PURCHIA**
(Mailed 4/8/2025)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Establish Policies, Processes, and Rules to Ensure Safe and Reliable Gas Systems in California and perform Long-Term Gas System Planning.

Rulemaking 20-01-007

**DECISION GRANTING COMPENSATION TO
THE UTILITY REFORM NETWORK
FOR SUBSTANTIAL CONTRIBUTION TO DECISION 24-09-034**

Intervenor: The Utility Reform Network (TURN)	For contribution to Decision (D.) 24-09-034
Claimed: \$106,083.75	Awarded: \$34,635.00
Assigned Commissioner: Karen Douglas	Assigned ALJs: David Van Dyken and Robyn Purchia

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	In D.24-09-034 , the Commission partially modified D.22-12-021 in response to the petition for modification filed jointly by California Environmental Justice Alliance (CEJA), Environmental Defense Fund (EDF), Sierra Club, Southern California Generation Coalition (SCGC), and TURN. The Commission in D.22-12-021 adopted General Order (GO) 177, which provides a mechanism for closer scrutiny of large gas infrastructure projects. The Commission also closed this proceeding and provided guidance to parties regarding the treatment of unresolved issues in the successor rulemaking.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812¹:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	03/24/2020	Verified
2. Other specified date for NOI:	04/13/2020	Verified
3. Date NOI filed:	04/09/2020	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:	R.19-01-011	Verified
6. Date of ALJ ruling:	07/26/2019	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:	R.19-01-011	Verified
10. Date of ALJ ruling:	07/26/2019	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.24-09-034	Verified
14. Date of issuance of Final Order or Decision:	10/2/24	Verified
15. File date of compensation request:	12/2/24	Verified
16. Was the request for compensation timely?		Yes

¹ All statutory references are to California Public Utilities Code unless indicated otherwise.

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
<p>1. Timing of Workshops Following GO 177 Annual Reports</p> <p>TURN, along with the other parties to the joint petition for modification of D.22-12-021 (herein after, TURN et al.), argued that D.22-12-021 should be modified to require the gas utilities to hold workshops <i>within 60 days</i> of filing their Annual Report of Planned Gas Investments pursuant to GO 177, rather than <i>no less than 60 days afterwards</i>. TURN et al. explained that the utilities held the first GO 177 Annual Reports workshop more than seven months after submitting their reports. TURN had advocated this same change jointly with SCGC in 10/31/23 Comments on the 2023 GO 177 Annual Reports filed by the Gas Utilities. There TURN/SCGC pointed out that holding a workshop <i>within 60 days</i> of filing would ensure that the GO 177 reports are still fresh on stakeholders’ minds and facilitate timely, productive feedback. Because the PG&E, SoCalGas, and SDG&E opposed this change to the deadline for the workshop, TURN et al. had to present this recommendation again in the PFM.</p> <p>In D.24-09-034, the Commission agreed with TURN et al. that the deadline for holding the workshop should be <i>within 60 days</i> of filing the GO 177 Annual Reports and modified D.22-12-021 accordingly.</p>	<ul style="list-style-type: none"> • Joint Petition for Modification (PFM), pp. 15-16. • TURN/SCGC Comments on the 2023 GO 177 Annual Report of Planned Gas Investments, 10/31/23, pp. 2, 5-6. • PG&E’s Response to Party Comments on the 2023 GO 177 Annual Report of Planned Investments, 12/15/23, Attachment A – Appendix, p. 1. • Joint Second Amended Report of SoCalGas/SDG&E for Planned Gas Investments Pursuant to GO 177, 12/15/23, Attachment A – Appendix A, p. A-5. • D.24-09-023, p. 12 (modifying D.22-12-021 at page 81, Conclusion of Law 12, and Ordering Paragraph 8). 	<p>Verified.</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>2. Clarification of Utility Responsibilities Following Party Comments on GO 177 Annual Reports</p> <p>TURN et al. recommended that the Commission modify Ordering Paragraph 12 of D.22-12-021 to address two issues. First, we recommended an extension through 2025 of the utility obligation to submit a Tier 3 Advice Letter proposing reporting requirement changes recommended by parties in their comments on the utilities’ GO 177 Annual Reports (and agreed to by the utilities).</p> <p>The Commission in D.24-09-034 agreed that the Advice Letter requirement should be extended through 2025 and modified D.22-12-021 accordingly.</p> <p>Second, TURN et al. recommended modification of the scope of the required Tier 3 Advice Letter to include the presentation of reporting requirement changes recommended by parties in their comments on the utilities’ GO 177 Annual Reports <i>but not agreed to by the utilities</i>. We explained that this change was necessary because the gas utilities have in large part ignored the reporting requirement changes recommended by parties in post-workshop comments on the GO 177 Reports, with no Commission oversight provided by D.22-12-021.</p> <p>While the Commission disagreed with the remedy proposed by TURN et al. for the second problem, the Commission made clear that the utilities may not ignore party comments. The</p>	<ul style="list-style-type: none"> • Joint Petition for Modification (PFM), pp. 16-18. • D.24-09-023, pp. 14-15 (modifying D.22-12-021 Ordering Paragraph 12). • D.24-09-023, p. 14 (directing the utilities to address party concerns about the reporting process under the current GO 177 requirements). • TURN et al. Comments on PFM Proposed Decision, 9/12/24, pp. 10-11. • Proposed Decision, Rev. 1 (Redline), p. 14 (showing changes incorporating the recommendation of TURN et al.). 	<p>Verified.</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>Commission stated, "As such, we appreciate the Petitioners' participation in the reporting process and direct utilities to address their concerns to the extent feasible."</p> <p>The Commission also revised the proposed decision preceding D.24-09-034 in response to comments by TURN et al.. TURN et al. pointed to the proposed decision's factual error in asserting that the PFM did not specify why Commission oversight is necessary. The Commission removed language questioning whether Commission oversight is necessary, instead suggesting that the proposed procedural remedy might not achieve TURN et al.'s intended result and denying it on that basis.</p>		
<p>3. Correcting the Proposed Decision's Discussion of the Safety Exemption</p> <p>In comments on the proposed decision that preceded D.24-09-034, TURN et al. argued that the proposed decision must be modified to avoid suggesting an expansion in the "safety exemption" in GO 177, without notice to parties or a record to support an expansion. In response, the Commission modified the proposed decision to remove the problematic language highlighted by TURN et al.</p>	<ul style="list-style-type: none"> • TURN et al. Comments on PFM Proposed Decision, 9/12/24, pp. 7-8. • Proposed Decision, Rev. 1 (Redline), p. 9 (showing changes incorporating the recommendation of TURN et al.). • D.24-09-034, p. 9. 	Verified.
<p>4. Clarifying the Opportunity for Intervenor's to Seek Compensation for Work on Unresolved Phase 3</p>	<ul style="list-style-type: none"> • TURN et al. Comments on PFM Proposed Decision, 12-13. • Proposed Decision, Rev. 1 (Redline), pp. 19-20 (showing 	Verified.

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>Issues in the Successor Rulemaking</p> <p>In comments on the proposed decision that preceded D.24-09-034, TURN et al. argued that the proposed decision should be modified to address intervenor compensation for work on Phase 3 issues, since the PD would close the proceeding without resolving these issues. TURN et al. specifically recommended that the Commission clarify that intervenors may seek intervenor compensation in the successor rulemaking for any hours and costs incurred in this proceeding related to Phase 3 and the Joint Agency Gas Transition White Paper. Other parties also raised concerns with this aspect of the proposed decision.</p> <p>The Commission modified the proposed decision to generally incorporate the recommendation offered by TURN et al. (and others).</p>	<p>changes incorporating the recommendation of TURN et al.).</p> <ul style="list-style-type: none"> • D.24-09-034, pp. 18-19. 	

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

	Intervenor’s Assertion	CPUC Discussion
<p>a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?²</p>	Yes	Verified
<p>b. Were there other parties to the proceeding with positions similar to yours?</p>	Yes	Verified
<p>c. If so, provide name of other parties:</p>		Verified

² The Office of Ratepayer Advocates was renamed the Public Advocate’s Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

	Intervenor’s Assertion	CPUC Discussion
<p>TURN shared positions with California Environmental Justice Alliance (CEJA), Environmental Defense Fund (EDF), Sierra Club, Southern California Generation Coalition (SCGC), Utility Consumers’ Action Network (UCAN), Small Business Utility Advocates (SBUA), and the Center for Accessible Technology (CforAT), specifically in the work related to implementation of GO 177.</p>		
<p>d. Intervenor’s claim of non-duplication:</p> <p><u>Work Related to Implementation of D.22-12-021 and GO 177</u></p> <p>Cal Advocates did not address the issues resolved by D.24-09-034, so there was no duplication with TURN’s work.</p> <p>TURN prepared all pleadings related to the implementation of GO 177 jointly with other parties with aligned interests so as to avoid the risk of duplication, as explained below.</p> <p>First, TURN and SCGC filed a joint response in support of EDF’s motion seeking a technical workshop on GO 177 implementation. SCGC prepared the initial draft of this joint response, with TURN providing substantive additions and revisions, such that both parties avoided duplication and efficiently produced a final pleading reflecting their overlapping but distinct interests.</p> <p>Second, TURN and SCGC filed joint post-workshop comments on the GO 177 Annual Reports. This time, TURN took the lead on drafting comments, with substantive input from SCGC.</p> <p>Third, SCGC took the lead in drafting the PFM that was joined by TURN, CEJA, EDF, and Sierra Club. TURN reviewed and provided substantive input to this draft and to subsequent drafts reflecting input from the other petitioners. Then Sierra Club took the leading in drafting the joint petitioners’ reply to responses to the PFM, with TURN providing substantive feedback on this draft. This collaborative process in preparing the PFM and reply allowed the joint petitioners to avoid duplication through separate filings, while also ensuring that the final workproduct accurately reflected each party’s positions. Because the joint petitioners have overlapping but not identical interests, this process was unavoidable and essential to effective coordination in presenting a joint PFM to the Commission.</p> <p>Finally, TURN joined with the other petitioners in submitting joint opening comments on the proposed decision that preceded D.24-09-034. After conferring with the petitioners on the scope and strategy for opening comments,</p>		<p>Noted</p>

	Intervenor’s Assertion	CPUC Discussion
	<p>TURN took the lead in drafting the joint opening comments, with other parties providing substantive additions and feedback. This approach created efficiencies for the other petitioners and avoided duplication.</p> <p>TURN notes that UCAN, SBUA, and CforAT also recommended in comments on the proposed decision that preceded D.24-09-034 that the Commission address (in various ways) intervenor compensation for work in this proceeding on issues being carried over to the successor rulemaking. In a proceeding of this breadth, with participation by many parties that rely on the Commission’s intervenor compensation program, it is understandable that numerous parties would be concerned about losing the opportunity to seek intervenor compensation for work conducted in good faith reliance on Commission rulings soliciting stakeholder participation. This concern was not unique to joint petitioners (four of whom participate in the intervenor compensation program). The Commission should find that the common concern expressed by intervenors regarding intervenor compensation does not amount to undue duplication by TURN, as parties otherwise addressed different issues in their opening comments. Moreover, in a proceeding involving so many participants, it is virtually impossible for TURN to completely avoid some duplication with the work of all other parties.</p> <p><u>Work in 2020-2023 on Unresolved Issues that Relate to Issues Within the Scope of the Successor Rulemaking R.24-09-012</u></p> <p>TURN took steps to minimize duplication, despite that in a proceeding involving so many participants, it is virtually impossible for TURN to completely avoid some duplication of the work of other parties. For instance, TURN was one of more than 20 parties filing comments on Track 2A Scoping Questions on 6/15/22 on the Staff Gas Infrastructure Decommissioning Proposal on 2/24/23.</p> <p>TURN reached out directly to several intervenors to coordinate positions and minimize duplication over the course of 2020-2023. Additionally, TURN participated in some of the early meetings (hosted by the CEC and Gridworks under contract to the Commission) that were designed to promote coordinated positions regarding “planned electrification”. These efforts served to reduce undue duplication.</p> <p>Furthermore, TURN’s analyses and recommendations concerning the key issues were distinct from the recommendations of other parties. TURN focused on ensuring distribution system investments in rate cases were closely evaluated for need, keeping in mind long-term decommissioning. Although TURN shared a common end-goal with environmental groups of planned decommissioning, the parties offered a range of recommendations regarding how to achieve this. Also,</p>	

	Intervenor’s Assertion	CPUC Discussion
<p>while Cal Advocates presented on transmission lines at the Phase 2A workshop on 1/10/22, TURN presented on distribution system issues. (ALJ Ruling, 3/1/22, Atch – Track 2 – Gas Infrastructure Workshop Report, Sec. 4.2 (Panel 2 – Cal Advocates), Sec. 4.4 (Panel 4 - TURN).</p>		

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
<p>a. Intervenor’s claim of cost reasonableness:</p> <p>In this claim, TURN requests roughly \$106,000 as the reasonable costs of our participation in the work covered by this claim. All of this work addressed policy issues, rather than revenue requirements. As such, it is impossible to quantify the financial impacts of TURN’s contributions. However, TURN’s contributions assisted the Commission in considering the complex technical and policy matters at issue in the gas transition in furtherance of the Commission’s goals in this proceeding, including (but not limited to) reducing the cost and extent of gas infrastructure without sacrificing reliability for gas customers. Specifically regarding GO 177 implementation, TURN’s efforts may help to minimize stranded costs in the natural gas system resulting from major infrastructure projects by enhancing the heightened review process and procedures adopted in D.22-12-021. TURN submits that these benefits outweigh the relatively modest cost of TURN’s participation.</p>	<p>Noted, but see CPUC disallowances and adjustments in Section III.D.</p>
<p>b. Reasonableness of hours claimed:</p> <p>TURN initially assigned this proceeding to TURN staff attorneys Marcel Hawiger and Camille Stough. Ms. Stough left TURN at the end of 2022, and Mr. Hawiger retired from TURN in the spring of 2023. With Mr. Hawiger’s impending departure, TURN attorney Hayley Goodson stepped in to cover issues emerging in 2023 related to the implementation of D.22-12-021 and GO 177. This claim includes roughly 180 hours of substantive attorney time covering work by Mr. Hawiger in 2020-2023, Ms. Stough in 2020-2022, and Ms. Goodson in 2023-2024. TURN submits this time is reasonable for the reasons explained below.</p>	<p>Noted, but see CPUC disallowances and adjustments in Section III.D.</p>

	CPUC Discussion
<p>Work in 2023-2024 Related to the Implementation of D.22-12-021 and GO 177</p> <p>This claim for intervenor compensation includes 42.75 hours that TURN attorney Hayley Goodson devoted to the implementation of GO 177 in 2023 and 2024. These hours include time spent (1) reviewing the gas utilities’ GO 177 Annual Reports, (2) raising deficiencies about those reports in response to the motion filed by EDF on 4/11/23 (which the Commission both denied without prejudice and affirmed, by directing the gas utilities to amend their GO 177 Reports and address the highlighted issues in the workshop required by D.22-12-021), (3) contributing to workshop planning and participation in the workshops, (4) preparing post-workshop comments filed on 10/31/23, and (5) preparation and defense of the petition for modification of D.22-12-021, including responding to the proposed decision preceding D.24-09-034. The relatively small number of hours for this work reflects the significant efficiency gains from preparing five formal filings jointly with other parties, as discussed in Section II.B.d above. TURN submits that these hours are reasonable in light of TURN’s contributions to D.24-09-034.</p> <p>Work in 2020-2023 on Unresolved Issues that Relate to Issues Within the Scope of the Successor Rulemaking R.24-09-012</p> <p>TURN also includes 136 hours of work in 2020-2023 that TURN attorneys Marcel Hawiger and Camille Stough devoted to issues originally contemplated for “Track 2” of this proceeding (OIR 20-01-007; 4/23/20 Assigned Commissioner’s Scoping Memo and Ruling), then scoped within Track 2A, 2B, and 2C (1/5/22 Assigned Commissioner’s Amended Scoping Memo and Ruling), then reclassified to Phase 3 (2/22/24 Assigned Commissioner’s Ruling Scheduling Phase 3 PHC and Providing Joint Agency Staff Gas Transition White Paper and Draft Phase 3 Scope and Schedule for Comment), which were not resolved on the merits by D.22-12-021, D.23-12-003, or any decision in this proceeding. These hours are associated with work TURN conducted at the direction or invitation of the Commission on issues within the scope of this proceeding, before the issuance of the 2/22/24 Ruling addressing Phase 3. Because of the timing of this work, it is unclear whether it falls into the Commission’s explicit invitation in D.24-09-034 to carry over Phase 3 hours to the successor rulemaking, R.24-09-012.</p> <p>As explained below, TURN submits it would be reasonable for the Commission to award TURN intervenor compensation here for all of this time. Alternatively, the Commission could reasonably decide to <u>either</u></p>	

	CPUC Discussion
<p>explicitly authorize TURN to carry all of these hours over to the successor rulemaking, R.24-09-012, for inclusion in any future compensation request TURN may file there, <u>or</u> to award compensation for a portion of the hours here and defer the remainder or R.24-09-012. TURN discusses below a reasonable approach to determining which time to compensate here and which to defer to R.24-09-012, should the Commission find this hybrid approach appropriate under the circumstances.</p> <p><i>Commission Direction in D.24-09-034</i></p> <p>In D.24-09-034 the Commission stated at page 19:</p> <p style="padding-left: 40px;">Additionally, parties who commented on the Phase 3 Scope and Schedule due on March 13, 2024, participated in the March 19, 2024 prehearing conference, and commented on the Joint Agency Staff White Paper due on April 15, 2024 (collectively, Phase 3 Issues) may carry over the hours they incurred to the new rulemaking and make a single claim for intervenor compensation in that proceeding.</p> <p>The directions in the quoted text are unambiguous that parties can carry over all “Phase 3” work conducted after the issuance of the Phase 3 Scoping Memo and Ruling on February 22, 2024. TURN has accordingly excluded the time spent on Phase 3 work starting with the February 2024 ruling from this claim and intends to carry that time over to R.24-09-012. However, the quoted text does not specify whether work conducted prior to February 2024 on issues that were subsequently scoped as Phase 3 in that Scoping Memo and Ruling can similarly be carried over for potential future compensation in R.24-09-012.</p> <p>TURN devoted approximately 125 hours of substantive work prior to February 2024 on various issues scoped in R.20-01-007 that were not addressed in decisions issued in the proceeding and are directly relevant to the Phase 3 issues identified in the Feb. 22, 2024 Phase 3 Scoping Memo and Ruling. TURN requests that the Commission either: 1) grant TURN compensation for all of these hours in this proceeding due to the fact that the work was justified as within the scope of the proceeding, but the issues were not resolved by the Commission; or else 2) clarify that these hours can be carried over to any future compensation request in R.24-09-012. The 125 hours consisted of work addressing two main categories of issues. Approximately 73 hours of work addressed the repair or replacement and possible decommissioning of distribution</p>	

	CPUC Discussion
<p>pipelines (hours coded by TURN as T2A, T2A-WS1); and approximately 52 hours of work related to gas transition planning and cost recovery and rates (coded T2B, T2C). In the following sections, TURN first explains that all of these issues were explicitly within the scope of R.20-01-007, and most appear to be within the scope of the new proceeding R.24-09-012.</p> <p>While it would be appropriate either to compensate TURN fully for these hours in R.20-01-007, or allow TURN to seek recovery in R.24-09-012, TURN suggests that the Commission might conclude that most appropriate course of action would be for the Commission to compensate TURN fully at this time for the work related to <u>distribution system issues</u> (coded T2A, T2A-WS1), as well as general Track 2 work (coded Coord, GP, and T2-Scope), while authorizing TURN to defer the work related to <u>gas planning and the gas transition</u> (coded T2B, T2C) to R.24-09-012.</p> <p><i>TURN Conducted Significant Work That Was Within the Scope of R.20-01-007</i></p> <p>The original OIR 20-01-007 identified a Track 2 for the proceeding that was intended to address several complex issues related to the long term planning necessary to transition to a lower demand natural gas system without significant negative financial or reliability impacts.³ The subsequent Scoping Ruling of April 23, 2020 set the scope and schedule for Track 1 issues, and reaffirmed that Track 2 issues “will implement the long-term planning strategy.”⁴ This Ruling further acknowledged that “there are other ongoing efforts related to data gathering and mapping needs that may directly affect Track 2 of this proceeding”⁵ Indeed, throughout 2020 and 2021 there were a number of efforts addressing long-term gas transition issues, including meetings of working groups at the California Energy Commission and meetings organized by Gridworks under contract with the Commission. The Commission issued a draft Scoping Memo for Track 2 on October 14, 2021, and after considering comments on the draft scope, the Commission finalized the Track 2 Scope in a Ruling issued on January 5, 2022.</p> <p>Prior to the draft Scoping Ruling, TURN had devoted 37.75 hours of attorney time to work directly related to issues identified within the scope of Track 2 in the OIR, including participation in some of the</p>	

³ OIR 20-01-007, pp. 19-20.

⁴ Scoping Ruling, April 23, 2020, p. 2.

⁵ Scoping Ruling, April 23, 2020, p. 6.

							CPUC Discussion
<p>ongoing efforts at the CEC and Gridworks. TURN then filed comments on the draft Scoping Memo for Track 2 on 11/2/21. The scoping of Track 2 was subsequently modified by a Scoping Ruling issued August 1, 2023, and then on February 22, 2024 the remaining Track 2 issues (not addressed in D.22-12-021 or D.23-12-003) were reclassified to a Phase 3 of the proceeding.</p> <p>The Scoping Memo and Ruling of January 5, 2022 organized Track 2 issues into three separate categories (Tracks 2 A, B and C). The January 2022 Scoping Ruling and subsequent ALJ Rulings set schedules for two workshops and provided opportunities for various comments on issues identified for the various phases of Track 2. Between October of 2021 (the Draft Scoping Ruling) and August of 2023 (the Amended Scoping Ruling for Track 2) TURN devoted approximately 87 hours to various Track 2 issues. Aside from minimal hours related to comments on storage, none of these hours relate to issues addressed in the previous decisions⁶ issued in this proceeding.</p> <p>Indeed, the approximately 125 hours of work devoted to Track 2 issues (coded T2A, T2A-WS1, T2B, T2C) all relate to Phase 3 issues that are arguably within the scope of R.24-09-012; however, the work all pre-dates the issuance of the February 22, 2024 Scoping Ruling for Phase 3 in this proceeding. The table below demonstrates the classification of these issues in various scoping rulings, the possible inclusion of these issues in R.24-09-012, and whether TURN directly addressed these issues in R.20-01-007.</p>							
Infrastructure planning (GO)	T2	T2A (a)	N/A. Resolved in D.22-12-021	N/A	N/A	Discussed here	
Distribution system repair and replacement	T2	T2A (d)	?	?	1.g	6/15/22 2/24/23	
Distribution system decommissioning	T2	T2A (e)	?	7	2.k	6/15/22 2/24/23	

⁶ The decisions addressing substantive issues in this proceeding included D.21-11-021 and D.22-04-042 (Rule 30 OFO Structure), D.22-07-002 (Track 1 Issues), D. 22-12-021 (Infrastructure GO 177), D.23-12-003 (Phase 2 Issues Regarding Transmission and Storage), D.24-09-034 (Partially Granting Petition to Modify D.22-12-021). TURN has already received compensation for contributions to the “Track 1” decisions D.22-04-042 and D.22-07-002.

							CPUC Discussion
Transmission system repair and replacement, derate	T2	T2A (b,c)	N/A. Resolved in D.23-12-003	N/A	N/A	N/A	<p>Prior to the January 2022 Scoping Ruling, TURN had contemporaneously coded the relevant work hours as “Track 2” hours. Based on the contemporaneous work descriptions, TURN has re-coded these hours to correspond to the January 5, 2022 categorizations using T2A, T2B and T2C designations if possible.</p> <p><i>Hours Related to Track 2A Issues Concerning Distribution System</i></p> <p>Approximately 73 hours of Track 2 work addressed the repair or replacement and possible decommissioning of distribution pipelines, identified as issues in Track 2-A (d, e and k) in the Scoping Ruling of January 5, 2022. TURN attorney Hawiger presented on these issues at the January 10, 2022 workshop.⁷ These issues were subsequently addressed in a staff proposal dated December 21, 2022.⁸ The Assigned Commissioner’s Ruling of February 22, 2024 explained that:</p>
Infrastructure needs for long-term customers		T2A (f)	?	6	2.t	6/15/22	
Storage system	T2	T2A (g)	N/A. Resolved in D.23-12-003	N/A	N/A	6/15/22	
Obligation to serve	T2	T2A (h)	?		1?	N/A	
Distribution system - zonal electrification	T2	T2A (k)	Ph 3 T4	5, 7 ?	?	2/24/23	
Gas transition - equity		T2B (a)	Ph 3 T3 and T4	7, 8	1.j, 2p	2/24/23	
Gas transition - minimizing stranded costs; rate design; affordability	T2	T2B (b)	Ph 3 T4	7	1.i, 2.k, 2.m	6/15/22	
						2/24/23	
						WS 1 Presentation	
Gas transition - depreciation		T2B (d)	Ph 3 T4	5	2.m	WS 1 Presentation	
Gas system transition planning	T2	T2C	Ph 3 T2	4	1 (various subparts)	2/24/23	

⁷ See, ALJ Ruling, March 1, 2022, Attached Track 2 – Gas Infrastructure Workshop Report, Section 4.4.4.

⁸ See, ALJ Ruling, December 22, 2022, Attachment “Staff Proposal on Gas Distribution Infrastructure Decommissioning Framework in Support of Climate Goals.”

	CPUC Discussion
<p>The staff proposal received extensive comment. I have reviewed and appreciate party comments in this area but intend to gather more information before returning to address the staff proposal at a later date.</p> <p>TURN was one of the parties that provided comments on February 24, 2023. TURN is not aware of any Commission Ruling or Decision further addressing the staff proposal for distribution system decommissioning. As explained in the Joint Agency White Paper, initially attached to the 2/22/24 Scoping Ruling and also attached to the Order Instituting Rulemaking 24-09-012, the questions concerning distribution system repair and replacement pertain directly to the issues discussed in the sections entitled “Coordinate Zonal Electrification and Fossil Gas Decommissioning” and “Minimize New System Investments” within the major subheading of “Managing the Gas Transition.”⁹ This issue was identified as Items 6 and 7 in D.24-03-057, which extended the statutory deadline in this proceeding.</p> <p>As indicated in the Table above, the distribution level issues relate to issues 1.g and 2.k in R.24-09-012, as well as possibly other subparts of the “Opportunities for Interim Action” issue.</p> <p><i>Hours Related to Gas Planning and Interim Actions</i></p> <p>Approximately 50 hours of TURN’s work addressed issues directly related to 1) gas planning and gas transition, and 2) cost recovery and rates. These issues had been initially identified within the scope of Track 2 in the Scoping Ruling of April 23, 2020, and subsequently reclassified to Track 2-B (b and d) and Track 2-C in the Scoping Ruling of January 5, 2022. These issues were tentatively scoped to be addressed in Tracks 2 and 3 of Phase 3 in the Assigned Commissioner’s Ruling of February 22, 2024. These issues were identified as “remaining issues” in D.24-03-057, falling within the categories 3, 4, 6 and 8 on page 3. These issues fall within the subparts of the “Long-Term Gas Transition Planning” issue identified in R.24-09-012, as detailed in the Table above.¹⁰</p> <p><i>TURN Recommendation for Compensation or Carry-Over of Hours to R.24-09-012</i></p>	

⁹ Joint Agency White Paper pp. 30, 32-34.

¹⁰ See, OIR 24-09-012, pp. 12-13. More specifically, these issues fall within various subparts of Issue 1.

	CPUC Discussion
<p>With respect to both of the issue areas discussed above, TURN requests that the Commission grant compensation for all the hours at this time. Alternatively, the Commission should authorize TURN to request compensation for all hours not included in the Commission’s award of compensation here in a future compensation request filed in R.24-09-012. Based on the specific scoping and nature of work conducted in Track 2 in this Rulemaking 20-01-007, TURN suggests that an appropriate division between this proceeding and R.24-09-012 would be for the Commission to compensate TURN at this time for work conducted on Track 2A issues (which are related to the gas distribution system), and to authorize TURN to carry over to R.24-09-012 work conducted on Track 2B and 2C issues (which are related to gas planning and the gas transition), as the latter were most unambiguously reclassified as Phase 3 issues in the 2/22/24 ruling.</p> <p>As discussed above, the Track 2A issues were directly addressed in workshops and comments, but the Commission decided “to address the staff proposal at a later date.” While TURN assumes that some of the issues concerning gas distribution system investment decisions may be addressed as part of R.24-09-012, it is not completely clear whether that will be the case. Given that the Commission explicitly directed parties to address these issues, but then decided to defer any decision on these issues, it would be appropriate to compensate intervenors for work conducted in R.20-01-007.</p> <p>The Commission has on multiple occasions found that a substantial contribution warrants the award of intervenor compensation even though no final decision on the merits was issued due to Commission decisions or intervening events.¹¹ Generally, the Commission has found it</p>	

¹¹ See, for example, D.19-10-017 (A.17-03-019, Application by SDG&E for waiver of affiliate transaction rules, awarding TURN full compensation for contribution where SDG&E withdrew its application and the final decision did not address the merits of the disputed issues.); D.13-02-032 (Awarding compensation even though the Commission dismissed the application due to unforeseen catastrophe at the Fukushima reactor.); D.07-07-031, pp. 7-9 (Awarding full compensation even though ABx6 mooted underlying application, because “if we prohibit compensation where the proceeding might go away for reasons unrelated to the intervenors’ actions, we might discourage participation in some of our most important proceedings.”); D.06-10-007, p. 8-9 (Awarding compensation despite no final decision based on Commission policy that “the risk of unanticipated dismissal should not be assigned to intervenors because doing so would make intervenors reluctant to participate in Commission proceedings.”); D.05-012-038 (Intervenor compensation appropriate even though no final decision issued due to passage of time.); D.04-03-031 (Granting intervenor compensation even though application rendered moot by legislation); D.02-08-061, p. 6-7 (“Denying TURN any compensation in this proceeding simply because circumstances beyond its control led to dismissal of the application would be both unfair and inconsistent with the intent of the intervenor compensation statutes.”).

	CPUC Discussion
<p>appropriate to grant compensation where litigated issues were not addressed in a final decision due to a variety of intervening events that were not reasonably foreseeable and beyond the control of the Intervenor. The Commission has also considered the appropriateness of the intervenor’s participation and the reasonableness of intervenor’s action in light of uncertainty. In this case, all of TURN’s hours spent on Tracks 2A, B and C pertained directly to issues that were within the scope of the original OIR as well as the Amended Scoping Ruling of January 5, 2022. The issues were addressed in scheduled workshops and comments. There is no way TURN could have foreseen that the Commission would close the proceeding without addressing these issues in any decision.</p> <p>On the other hand, the work conducted in 2020-2022 on issues later included in Phase 3 in the 2/22/24 Scoping Ruling, including gas transition planning and various ratemaking adjustments (time coded by TURN as T2B and T2C), appears to fall more squarely into the issues identified within the scope of OIR 24-09-012. TURN suggests that it would be appropriate to carry over these hours to R.24-09-012. However, the Commission could choose to compensate TURN for these hours based on the same principles as discussed above for work that did not lead to a final decision on the merits due to events outside the control of the intervenor.</p> <p>The directions in the quoted paragraph are somewhat ambiguous as to whether hours “incurred” for work on Phase 3 issues (as reclassified) prior to the issuance of the February 22, 2024 Scoping Ruling are appropriate for “carry over.”</p> <p>TURN thus requests that if the Commission does not grant TURN full compensation for these hours, it authorize TURN to carry over the hours spent on all work ultimately reclassified as Phase 3 (including time coded as T2B and T2C, and potentially also T2A) for any future compensation request in R.24-09-012.</p> <p><i>TURN does not includes work contributing to D.23-12-003.</i></p> <p>TURN devoted a very small amount of time (less than five hours) to issues addressed in D.23-12-003. In our comments on June 15, 2022, TURN addressed the issue of the use of gas storage, as noted on page 36 of D.23-12-003. However, it is not possible to easily segregate time spent on this one section of the June comments. TURN recorded only a very limited amount of time related to the issue of derating transmission lines; even though TURN had previously spent a considerable amount of time</p>	

	CPUC Discussion
<p>on technical workshops and comments addressing this issue in 2018 as a consequence of activities in A.15-09-013. TURN never sought compensation for this time and has reclassified it as time spent on important work at the Commission that will not be claimed for compensation. TURN thus does not attempt to claim compensation for contributions to D.23-12-003.</p> <p>Hours Devoted to Preparing this Intervenor Compensation Claim</p> <p>TURN attorney Hayley Goodson took primary responsibility for preparing this compensation request, given her role as TURN’s sole representative in the most recent work related to the implementation of GO 177 and culminating in D.24-09-034. This claim includes 14.50 hours of Ms. Goodson’s time preparing this request.</p> <p>Ms. Goodson also enlisted the assistance of TURN’s former staff attorney Marcel Hawiger, who retired from TURN on April 30, 2023. TURN retained Mr. Hawiger to assist with the review of TURN’s hours in 2020-2023, unrelated to GO 177 implementation, that TURN did not include in its initial request for compensation in this proceeding (which the Commission resolved in D.24-03-026). This time, as explained above, included work by Mr. Hawiger and Ms. Stough (who left TURN in late 2022 and thus was not available to assist with this claim), on issues originally scoped within Track 2, and then Track 2A, 2B, and 2C. Mr. Hawiger assisted TURN in determining which of those hours to include in this claim, coding those hours, and drafting the discussion above regarding the treatment of those hours by the Commission. Because of the procedural twists and turns in this proceeding over several years, including its closure in D.24-09-034 with many unresolved issues deferred to the successor rulemaking R.24-09-012, Mr. Hawiger’s review and analysis took a fair amount of time and required a review of pertinent parts of the docket as well as TURN’s timesheets. Even so, having him do this review instead of Ms. Goodson was far more efficient given his first-hand knowledge as TURN’s lead advocate until his retirement. TURN includes 11.25 hours of Mr. Hawiger’s time contributing to this compensation request.</p> <p>TURN submits that these hours are reasonable in light of circumstances of this proceeding and this claim.</p>	
<p>c. Allocation of hours by issue:</p> <p>TURN has allocated all of our staff time by issue or activity area, as is evident on our attached timesheets (Attachment 2) and in Attachment 3,</p>	<p>Noted, but see CPUC disallowances and</p>

			CPUC Discussion
<p>which shows the allocation of TURN’s time included in this request by advocate and issue area. The following codes relate to specific substantive issue and activity areas addressed by TURN.</p>			<p>adjustments in Section III.D.</p>
Code	Description	Allocation of Time	
Coord	Coordination with other intervenors	0.7%	
GO177-PFM	Work related to petition for modification of D.22-12-021	2.7%	
GO177-PFM-PD	Work related to reviewing and commenting on the proposed decision that preceded D.24-09-034	14.3%	
GO177-WS	Work related to workshops on GO 177 Annual Reports	7.0%	
GP	General work necessary for participation	2.0%	
T2-Scope	Writing comments on draft scoping ruling of 10/14/2021	3.5%	
T2A	Work related to issues identified within Track 2A in the Scoping Ruling of 1/5/2022	28.4%	
T2A-WS1	Work related to TURN presentation at Workshop #1 on Jan. 10, 2022	12.4%	
T2B	Work related to issues identified within Track 2B in the Scoping Ruling of 1/5/2022	6.2%	
T2C	Work related to issues identified within Track 2C in the Scoping Ruling of 1/5/2022	22.9%	
TOTAL	(excluding intervenor compensation time)	100.0%	
<p>If the Commission believes that a different approach to issue-specific allocation is warranted here, TURN requests the opportunity to supplement this section of the request.</p>			

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Hayley Goodson, TURN Attorney	2023	13.00	\$625.00	D.24-02-040	\$8,125.00	13.00	\$625.00	\$8,125.00
Hayley Goodson, TURN Attorney	2024	29.75	\$680.00	D.24-09-017	\$20,230.00	29.75	\$680.00	\$20,230.00

CLAIMED						CPUC AWARD		
Marcel Hawiger, TURN Attorney	2020	4.00	\$455.00	D.21-05-010	\$1,820.00	0 [1]	NA	\$0
Marcel Hawiger, TURN Attorney	2021	14.50	\$650.00	D.22-07-021	\$9,425.00	0 [2]	NA	\$0
Marcel Hawiger, TURN Attorney	2022	37.50	\$670.00	D.23-03-042	\$25,125.00	0 [3]	NA	\$0
Marcel Hawiger, TURN Attorney	2023	12.25	\$735.00	D.23-10-017	\$9,003.75	0 [4]	NA	\$0
Camille Stough, TURN Attorney	2020	6.50	\$275.00	D.22-11-017	\$1,787.50	0 [5]	NA	\$0
Camille Stough, TURN Attorney	2021	33.75	\$370.00	D.23-02-037	\$12,487.50	0 [6]	NA	\$0
Camille Stough, TURN Attorney	2022	27.50	\$380.00	D.23-10-017	\$10,450.00	0 [7]	NA	\$0
Subtotal: \$98,453.75						Subtotal: \$28,355.00		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Hayley Goodson, TURN Attorney	2024	14.50	\$340.00	1/2 of 2024 authorized rate	\$4,930.00	14.50	\$340.00	\$4,930.00
Marcel Hawiger, Consultant	2024	11.25	\$240.00	Consultant billed rate for work on this compensation request (See Comment #1)	\$2,700.00	11.25	\$120.00 [8]	\$1,350.00
Subtotal: \$7,630.00						Subtotal: \$6,280.00		
TOTAL REQUEST: \$106,083.75						TOTAL AWARD: \$34,635.00		
<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' 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>								

CLAIMED			CPUC AWARD
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ¹²	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Hayley Goodson	December 2003	228535	No
Marcel Hawiger	January 1998	194244	No
Camille Stough	June 2016	309555	No

C. Attachments Documenting Specific Claim and Comments on Part III:

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	TURN Hours
Attachment 3	Time Allocation by Issue
Comment 1	<p>2024 Hourly Rate for Marcel Hawiger, Consulting Attorney</p> <p>Marcel Hawiger was a staff attorney at TURN for 25 years before retiring on April 30, 2023. All of his work in 2020-2023 included in this claim was during his tenure as a TURN staff attorney. TURN has accordingly requested the same hourly rates as previously approved by the Commission for Mr. Hawiger’s work as a TURN staff attorney.</p> <p>Following his retirement from TURN, Mr. Hawiger has performed consulting attorney work for TURN on a contract basis. TURN retained Mr. Hawiger to assist with the preparation of this compensation request, specifically related to the work conducted by Mr. Hawiger and Ms. Stough earlier in the proceeding. Mr. Hawiger billed TURN \$240 an hour for these services – an extremely low rate given his skills and experience. TURN accordingly requests that the Commission adopt an hourly rate of \$240/hour for Mr. Hawiger’s work in 2024 assisting TURN with the preparation of this compensation request.</p> <p>TURN will amend this claim to include documentation of Mr. Hawiger’s billing rate as soon as TURN receives Mr. Hawiger’s November 2024 invoice covering work on this compensation request.</p>

¹² This information may be obtained through the State Bar of California’s website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason																								
<p>[1] Reduction of 2020 Hours for Marcel Hawiger</p>	<p>The IComp Program Guide at 4 states that "a request for an award of compensation may be filed after the issuance of a decision that resolves an issue on which the intervenor believes it made a substantial contribution." The issues of Track 2 (T2) scope, review criteria, and information requirements were not resolved in this decision (D.24-09-034), so they are not compensable.</p> <p>The decision did not resolve any T2B and T2C issues, therefore efforts related to T2B and T2C issues are not compensable. We reduce total of 4.0 hours from Marcel Hawiger’s 2020 hours accordingly.</p> <table border="1" data-bbox="490 751 1485 1297"> <thead> <tr> <th data-bbox="496 760 597 831">Task</th> <th data-bbox="597 760 1192 831">Description</th> <th data-bbox="1192 760 1377 831">Date</th> <th data-bbox="1377 760 1479 831">Time Spent</th> </tr> </thead> <tbody> <tr> <td data-bbox="496 831 597 909">T2C</td> <td data-bbox="597 831 1192 909">Mtg w/ Camille to discuss issues re. Track 2 on reliability</td> <td data-bbox="1192 831 1377 909">10/29/2020</td> <td data-bbox="1377 831 1479 909">0.25</td> </tr> <tr> <td data-bbox="496 909 597 1024">T2C</td> <td data-bbox="597 909 1192 1024">Close read of GridWorks draft Gas Resource and Infrastructure Planning Report, including appendices</td> <td data-bbox="1192 909 1377 1024">11/5/2020</td> <td data-bbox="1377 909 1479 1024">1.50</td> </tr> <tr> <td data-bbox="496 1024 597 1102">T2C</td> <td data-bbox="597 1024 1192 1102">Read Gridworks draft “gas resource and infrastructure planning” report</td> <td data-bbox="1192 1024 1377 1102">11/18/2020</td> <td data-bbox="1377 1024 1479 1102">0.75</td> </tr> <tr> <td data-bbox="496 1102 597 1218">T2B</td> <td data-bbox="597 1102 1192 1218">Listen to BDC webinar w/ Mad Stano of Greenlining discussing equitable transition policy for R.20-01-007</td> <td data-bbox="1192 1102 1377 1218">12/2/2020</td> <td data-bbox="1377 1102 1479 1218">0.75</td> </tr> <tr> <td data-bbox="496 1218 597 1297">T2C</td> <td data-bbox="597 1218 1192 1297">Close read of portions of Gridworks “Nat gas in transition” report</td> <td data-bbox="1192 1218 1377 1297">12/8/2020</td> <td data-bbox="1377 1218 1479 1297">0.75</td> </tr> </tbody> </table>	Task	Description	Date	Time Spent	T2C	Mtg w/ Camille to discuss issues re. Track 2 on reliability	10/29/2020	0.25	T2C	Close read of GridWorks draft Gas Resource and Infrastructure Planning Report, including appendices	11/5/2020	1.50	T2C	Read Gridworks draft “gas resource and infrastructure planning” report	11/18/2020	0.75	T2B	Listen to BDC webinar w/ Mad Stano of Greenlining discussing equitable transition policy for R.20-01-007	12/2/2020	0.75	T2C	Close read of portions of Gridworks “Nat gas in transition” report	12/8/2020	0.75
Task	Description	Date	Time Spent																						
T2C	Mtg w/ Camille to discuss issues re. Track 2 on reliability	10/29/2020	0.25																						
T2C	Close read of GridWorks draft Gas Resource and Infrastructure Planning Report, including appendices	11/5/2020	1.50																						
T2C	Read Gridworks draft “gas resource and infrastructure planning” report	11/18/2020	0.75																						
T2B	Listen to BDC webinar w/ Mad Stano of Greenlining discussing equitable transition policy for R.20-01-007	12/2/2020	0.75																						
T2C	Close read of portions of Gridworks “Nat gas in transition” report	12/8/2020	0.75																						
<p>[2] Reduction of 2021 Hours for Marcel Hawiger</p>	<p>The IComp Program Guide at 4 states that "a request for an award of compensation may be filed after the issuance of a decision that resolves an issue on which the intervenor believes it made a substantial contribution." The issues of T2 scope, review criteria, and information requirements were not resolved in D.24-09-034, so they are not compensable.</p> <p>Instead, T2-Scope, T2A, and T2A-WS1 issues were addressed in D.22-12-021 and D.23-12-003. Therefore, tasks related to T2-Scope, T2A, and T2A-WS1 are not compensable in this decision. Additionally, the decision did not resolve the T2C issues, therefore tasks related to the T2C issues are also not compensable. We reduce a total of 14.50 hours from Marcel Hawiger’s 2021 hours accordingly.</p>																								

Item	Reason			
	Task	Description	Date	Time Spent
	T2C	Attend CEC Gas Working Group mtg re. transition to decarbonization	1/28/2021	1.50
	T2A	Write email to camille re. defn of Transmission v. distribution pipeline; Review prior documents from SED Meeting	2/24/2021	0.50
	GP	Read Amended Scoping memo of 10/14 re. Track 2	10/19/2021	0.50
	T2-Scope	Review Camille's spreadsheet re. T2 issues for comments on amended scoping memo and t/c mtg w/ Camille re comments	11/1/2021	0.75
	T2-Scope	T/c mtg w/ Camille re. reply comments on scope; Read draft comments from NRDC	11/8/2021	0.75
	T2-Scope	T/c mtg w/ Camille re. other parties' comments and reply comments	11/18/2021	0.25
	T2-Scope	Skim coments or reply comments on scope of PG&E; PCF+SCGC; EDF; NRDC	11/18/2021	0.50
	T2A-WS1	Read email from ED re. Jan 10 WS; write email to Camille re response to ED	12/6/2021	0.25
	T2C	Attend Day 1 of Brattle webinar re 'the future of gas utilities'	12/7/2021	3.50
	T2C	Attend Day 2 of Brattle webinar re 'the future of gas utilities'	12/8/2021	3.50
	T2A-WS1	Prep for WS 1 - review PG&E data from rate case; prep for Q d responses	12/9/2021	0.50
	T2A-WS1	Prep slides for workshop #1	12/10/2021	0.75
	T2A-WS1	Emails and t/c re. noticing WS 1 on GRC	12/14/2021	0.25
	T2A-WS1	Prep notes for workshop #1	12/16/2021	0.75
	T2A-WS1	read emails re. Jan 10 workshop; write email to staff	12/23/2021	0.25
[3] Reduction of 2022 Hours for Marcel Hawiger	The IComp Program Guide at 4 states that "a request for an award of compensation may be filed after the issuance of a decision that resolves an issue on which the intervenor believes it made a substantial contribution."			

Item	Reason			
	<p>The issues of T2 scope, review criteria, and information requirements were not resolved in D.24-09-034, so they are not compensable.</p> <p>Instead, T2-Scope, T2A, and T2A-WS1 issues were addressed in D.22-12-021 and D.23-12-003, therefore tasks related to T2-Scope, T2A, and T2A-WS1 are not compensable in this decision. Additionally, the decision did not resolve the T2B and T2C issues, therefore tasks related to the T2B and T2C issues are not compensable. We reduce a total of 37.50 hours from Marcel Hawiger's 2022 hours accordingly.</p>			
	Task	Description	Date	Time Spent
	T2A-WS1	T/c mtg w/ Camille re. WS 1 and WS 2	1/3/2022	0.50
	T2A-WS1	Continue preparing slides and presentation for WS1 - review PG&E workpapers and collect relevant data	1/3/2022	1.25
	T2A-WS1	Continue preparing slides and presentation for WS1 - data analysis, prepare figures	1/4/2022	1.25
	T2A-WS1	Prepare slides for WS 1	1/5/2022	1.25
	T2A	Listen to portion of CEC webinar of workshop "Strategic Pathways and Analytics for Tactical Decommissioning of Portions of Natural Gas Infrastructure" of 11/17/21	1/6/2022	0.50
	T2A-WS1	Finalize presentation; practice; check data	1/6/2022	2.75
	T2A-WS1	Attend WS 1; present for TURN on panel re. Q d	1/10/2022	5.50
	T2A	Attend WS 2	1/24/2022	6.00
	T2A	Write email to ED staff re. de-rating natural gas T lines	1/25/2022	0.25
	T2C	Attend CEC Gas Working Group mtg re. IEPR gas update report and transition issues (bill 50% of time)	1/27/2022	1.00
	T2A	Tc mtg w/ Camille re. Jan. 24 workshop	2/2/2022	0.25
	GP	Skim ALJ Ruling of 2/9 re data from IOUs	2/9/2022	0.25
	T2A	Mtg w/ PG&E re. planned Monterey CSU electrification instead of pipe replacement project	2/17/2022	0.75

Item	Reason			
	T2B	Listen to affordability en banc re gas rates and gas transition (bill only one panel)	3/1/2022	1.50
	T2A	Read ALJ Ruling of 3/1/22 re workshop report; read portions of workshop report to evaluate any corrections	3/15/2022	0.50
	T2A	Skim opening briefs (EDF, Sierra Club, UCAN, SCG) filed 2/28 re. T2-Qa	3/15/2022	0.50
	T2A	Review Scoping Memo of 1/5/22 re Track 2A schedule and evidentiary hearings	3/15/2022	0.25
	T2B	Listen to Natural Gas 101 webinar re. a "Just Transition"	3/16/2022	2.00
	T2B	Attend portion of workshop on equity	3/29/2022	2.50
	T2A	Read ALJ Ruling of 5/15; review Scoping Memo Questions; begin comments on Q 2.1(d)	6/1/2022	1.25
	Coord	T/c mtg w/ Camille and Melissa K. (CforAT) re comments due next week	6/9/2022	0.50
	T2A	Draft comments re. Amended Scoping Memo Questions 2.1	6/9/2022	1.25
	T2A	Write comments on Questions 2.1 (Review slides from workshops; write comments)	6/10/2022	2.75
	T2A	Find citations and data responses for comments; draft text	6/13/2022	0.75
	T2A	Edit draft comments	6/14/2022	0.75
	T2A	Finalize comments (incorporate edits from Camille; finalize cites; read through)	6/15/2022	1.25
	T2B	Review Scoping Ruling and write email memo to CS re Track 2B issues (depreciation)	9/1/2022	0.25
[4] Reduction of 2023 Hours for Marcel Hawiger	<p>The IComp Program Guide at 4 states that "a request for an award of compensation may be filed after the issuance of a decision that resolves an issue on which the intervenor believes it made a substantial contribution." The issues of T2 scope, review criteria, and information requirements were not resolved in D.24-09-034, so they are not compensable.</p> <p>Instead, T2A issues were addressed in D.22-12-021 and D.23-12-003, therefore tasks related to T2A issues are not compensable in this decision.</p>			

Item	Reason			
	<p>We reduce a total of 12.25 hours from Marcel Hawiger’s 2023 hours accordingly.</p>			
	Task	Description	Date	Time Spent
	T2A	Skim Staff Proposal on Decommissioning attached to 12/22 ALJ Ruling	1/3/2023	0.50
	T2A	Close read of Sections 3 and 4 of staff proposal on decommissioning	1/5/2023	0.50
	T2A	Skim PG&E and SCG data responses to ALJ Ruling of Feb. 2022 to prep for comments on Staff Proposal	1/9/2023	0.50
	T2A	Continue reading Staff Proposal on decommissioning (Sec. 3, 4, 5)	1/9/2023	0.75
	T2A	Read D.22-12-027 re. c/e and RDF (related to evaluating c/e of decommissioning)	1/9/2023	0.50
	T2A	Create spreadsheet of questions in Staff Proposal	1/12/2023	0.50
	T2A	Write responses to Staff Proposal re pipe decommissioning; write email to Adria re issue of community sponsors	2/23/2023	2.25
	T2A	Write responses to multiple questions in Staff Proposal re pipe decommissioning	2/24/2023	6.00
	T2A	Read portions of SoCalGas comments on Staff Proposal for gas pipeline decommissioning	3/1/2023	0.50
	T2A	Start reading PG&E comments on Staff Proposal	3/1/2023	0.25
<p>[5] Reduction of 2020 Hours for Camille Stough</p>	<p>The IComp Program Guide at 4 states that "a request for an award of compensation may be filed after the issuance of a decision that resolves an issue on which the intervenor believes it made a substantial contribution." The issues of T2 scope, review criteria, and information requirements were not resolved in D.24-09-034, so they are not compensable.</p>			
	<p>The decision did not resolve the T2C issues, therefore tasks related to the T2C issues are not compensable. We reduce a total of 6.50 hours from Camille Stough’s 2020 hours accordingly.</p>			
	Task	Description	Date	Time Spent
	T2C	Confer with MT and MH re Gridworks Resource Infrastructure Plan Report	11/19/2020	0.50

Item	Reason																			
	T2C	Review revisions to Gridworks Resource Infrastructure Plan Report and review emails re updates to same	11/20/2020	1.50																
	T2C	Draft suggested edits and comments to Gridworks Resource Infrastructure Plan report	11/30/2020	3.00																
	T2C	Confer with MT re Gridworks Resource Infrastructure Plan Report and make edits to same	12/1/2020	0.50																
	T2C	Evaluate motion to establish memorandum accounts for hydrogen projects	12/1/2020	0.25																
	T2C	Review draft versions of Gridworks Resource Infrastructure Plan Report and edit same	12/1/2020	0.75																
[6] Reduction of 2021 Hours for Camille Stough	<p>The IComp Program Guide at 4 states that "a request for an award of compensation may be filed after the issuance of a decision that resolves an issue on which the intervenor believes it made a substantial contribution." The issues of T2 scope, review criteria, and information requirements were not resolved in D.24-09-034, so they are not compensable.</p> <p>Instead, T2-Scope, T2A, and T2A-WS1 issues were addressed in D.22-12-021 and D.23-12-003, therefore tasks related to T2-Scope, T2A, and T2A-WS1 are not compensable in this decision. Additionally, the decision did not resolve the T2C issues, therefore tasks related to the T2C issues not compensable. Any preparation related to any Ex Parte would be disallowed. We reduce a total of 33.75 hours from Camille Stough’s 2021 hours accordingly.</p> <table border="1" data-bbox="488 1377 1485 1803"> <thead> <tr> <th data-bbox="493 1377 656 1455">Task</th> <th data-bbox="656 1377 1192 1455">Description</th> <th data-bbox="1192 1377 1378 1455">Date</th> <th data-bbox="1378 1377 1481 1455">Time Spent</th> </tr> </thead> <tbody> <tr> <td data-bbox="493 1455 656 1570">T2C</td> <td data-bbox="656 1455 1192 1570">Review final Gridworks Resource Infrastructure Plan Report for consideration in Track 3</td> <td data-bbox="1192 1455 1378 1570">1/13/2021</td> <td data-bbox="1378 1455 1481 1570">2.00</td> </tr> <tr> <td data-bbox="493 1570 656 1648">T2C</td> <td data-bbox="656 1570 1192 1648">Read EDF report on gas regulatory reforms</td> <td data-bbox="1192 1570 1378 1648">1/20/2021</td> <td data-bbox="1378 1570 1481 1648">1.50</td> </tr> <tr> <td data-bbox="493 1648 656 1803">T2C</td> <td data-bbox="656 1648 1192 1803">Continue review of final Gridworks Resource Infrastructure Plan Report for consideration in Track 3 and prepare summary of same</td> <td data-bbox="1192 1648 1378 1803">1/26/2021</td> <td data-bbox="1378 1648 1481 1803">1.25</td> </tr> </tbody> </table>				Task	Description	Date	Time Spent	T2C	Review final Gridworks Resource Infrastructure Plan Report for consideration in Track 3	1/13/2021	2.00	T2C	Read EDF report on gas regulatory reforms	1/20/2021	1.50	T2C	Continue review of final Gridworks Resource Infrastructure Plan Report for consideration in Track 3 and prepare summary of same	1/26/2021	1.25
Task	Description	Date	Time Spent																	
T2C	Review final Gridworks Resource Infrastructure Plan Report for consideration in Track 3	1/13/2021	2.00																	
T2C	Read EDF report on gas regulatory reforms	1/20/2021	1.50																	
T2C	Continue review of final Gridworks Resource Infrastructure Plan Report for consideration in Track 3 and prepare summary of same	1/26/2021	1.25																	

Item	Reason			
	T2C	Review CEC working group January workshop agenda and notes regarding gas market participants	2/11/2021	1.00
	T2C	Attend Gridworks and EDF webinar on gas planning reports	2/12/2021	1.00
	T2A	Read materials on gas transmission and distribution topics in preparation for CEC working group meeting	2/24/2021	0.75
	T2A	Discuss with MH re CEC working group meeting on gas transmission and distribution topics	2/25/2021	0.75
	T2A	Read materials on gas transmission and distribution topics in preparation for CEC working group meeting	2/25/2021	1.50
	T2A	Attend CEC working group meeting on gas transmission and distribution topics	2/25/2021	2.00
	T2A	Confer with consultant M. Florio re gas storage issues	3/23/2021	0.50
	T2C	Attend CEC gas working group	3/25/2021	2.00
	T2C	Review CEC Advice Letter re Natural Gas Research and Development Program Budget	4/2/2021	0.50
	T2C	Attend CEC gas working group re renewable natural gas and hydrogen	4/29/2021	2.00
	T2C	Attend RAP webinar re gas system planning and review relevant report	5/11/2021	2.00
	GP	Review SoCalGas ex parte notice of written communication and attached materials	5/12/2021	0.50
	GP	Review ALJ ruling granting motion to suspend schedule	5/13/2021	0.25
	T2C	Attend CEC gas working group re market impacts from polar vortex	5/27/2021	2.00
	T2C	Attend CEC IEPR workshop re Gas and Electric system reliability	7/9/2021	2.50
	T2C	Attend CEC gas working group re market impacts from polar vortex	7/29/2021	2.00
	GP	Read CPUC Executive Director letter re Ventura Compressor Station	8/20/2021	0.25
	T2C	Attend CEC natural gas working group re PSEP and federal mega rules	9/30/2021	2.00

Item	Reason			
	Coord	Confer with ratepayer intervenors on scoping memo	10/20/2021	0.25
	T2-Scope	Strategize on scoping memo issues for Track 2 in preparation for potential comments	10/28/2021	0.75
	T2-Scope	Strategize with MH on scoping memo comments for Track 2	11/1/2021	0.50
	T2-Scope	Draft comments on scoping memo for Track 2	11/2/2021	1.00
	T2-Scope	Confer with MH re reply comments on scoping memo and ruling	11/8/2021	0.50
	T2-Scope	Review party reply comments on scoping memo and ruling	11/16/2021	1.00
	T2-Scope	Confer with MH re scoping issues and party reply comments	11/18/2021	0.25
	T2A-WS1	Review email from ED staff re workshop panels and confer with MH re same	12/3/2021	0.50
	T2A-WS1	Review Oct 2021 Scoping Memo re workshop topics in January and strategize on same	12/6/2021	0.50
	T2A-WS1	Correspond with Energy Division staff re upcoming workshop panel participation on aging distribution and noticing of workshop in other proceedings	12/14/2021	0.25
[7] Reduction of 2022 Hours for Camille Stough	<p>The IComp Program Guide at 4 states that "a request for an award of compensation may be filed after the issuance of a decision that resolves an issue on which the intervenor believes it made a substantial contribution." The issues of T2 scope, review criteria, and information requirements were not resolved in D.24-09-034, so they are not compensable.</p> <p>Instead, T2-Scope, T2A, and T2A-WS1 issues were addressed in D.22-12-021 and D.23-12-003, therefore tasks related to T2-Scope, T2A, and T2A-WS1 are not compensable in this decision. Additionally, the decision did not resolve the T2B issues, therefore tasks related to the T2B issues are not compensable. Any preparation related to any Ex Parte would be disallowed. We reduce a total of 27.50 hours from Camille Stough's 2022 hours accordingly.</p>			

Item	Reason			
	Task	Description	Date	Time Spent
	T2A-WS1	Discuss with MH participation on panels in Track 2a workshops	1/3/2022	0.25
	GP	Review amended scoping memo and ruling re new scope of issues and modified procedural schedule	1/5/2022	0.25
	T2A-WS1	Attend workshop #1 discussing Track 2A issues	1/10/2022	2.00
	T2A-WS1	Watch panels from Jan 10 workshop discussing Track 2A issues	1/12/2022	2.00
	T2A-WS1	Watch panels from Jan 10 workshop discussing Track 2A issues	1/13/2022	1.50
	T2A	Attend part of workshop #2 discussing Track 2A issues	1/24/2022	3.50
	T2A	Watch panels from Jan 24 workshop discussing Track 2A issues	2/1/2022	3.00
	T2A	Discuss recent workshops with MH	2/2/2022	0.25
	GP	Review ALJ Ruling requiring distribution line data from gas IOUs	2/9/2022	0.25
	T2A	Meeting with PG&E re proposed CSU Monterey electrification project	2/17/2022	0.75
	Coord	Confer with parties on Question 2a ex parte and review procedural schedule	2/18/2022	0.50
	GP	Review ALJ rulings re additional data from IOUs and workshop report	3/2/2022	0.50
	T2B	Attend equity workshop	3/29/2022	3.50
	T2A	Review ruling denying motions for hearings and testimony	5/5/2022	0.25
	T2B	Read draft report on equity workshop	5/9/2022	0.50
	T2A	Read ALJ ruling on comments to Track 2a questions b through k, review referenced issues from January scoping memo, and confer with MH re same	5/27/2022	0.50
	T2A	Revise comments on Track 2a issues regarding gas infrastructure decommissioning and investments (questions d, e, f, g)	6/14/2022	2.00
	T2A	Revise comments on Track 2a issues regarding gas infrastructure	6/15/2022	3.00

Item	Reason			
		decommissioning and investments (questions d, e, f, g)		
	T2A	Read party comments on Track2a (b)-(k) issues	6/24/2022	2.00
	T2A	Confer with CforAT on reply comments	6/24/2022	0.25
	GP	Read ALJ Ruling for comments on general order 131D	7/1/2022	0.25
	GP	Review ALJ ruling requesting data from utilities	9/21/2022	0.25
	GP	Read ALJ Ruling re suspending amended scoping memo 2b workshop	10/10/2022	0.25
[8] Marcel Hawiger 2024 Hourly Rate	<p>TURN has confirmed that Marcel Hawiger is a consultant.</p> <p>Pursuant to Commission policy, the rate requested by an intervenor must not exceed the rate billed to that intervenor by any outside consultant it hires, even if the consultant’s billed rate is below the floor for a given experience level.¹³ Per the IComp Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§ 1804(d)).</p> <p>TURN has confirmed that it paid Marcel Hawiger \$240 an hour to prepare intervenor compensation claims specifically. Pursuant to the Intervenor Compensation Program Guide at 22, claim preparation time is compensated at 50% of the person’s hourly rate. 50% of \$240 is \$120. Therefore, we find \$120 an hour reasonable and adopt it here.</p> <p>The award determined herein for the consultant’s contribution in this proceeding shall be paid in full to the consultant, and no portion of this part of the award shall be kept by the intervenor. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission’s policy on consultant compensation.</p>			

¹³ D.07-01-009, D.08-04-010, and ALJ Resolution ALJ 235.

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 (see Rule 14.6(c)(6))?	No

If not:

Party	Comment	CPUC Discussion

FINDINGS OF FACT

1. The Utility Reform Network has made a substantial contribution to D.24-09-034.
2. The requested hourly rates for The Utility Reform Network’s representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services, and/or reflect the actual rates billed to, and paid by the intervenor, for consultant services rendered.
3. The claimed costs and expenses are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$34,635.00.

CONCLUSION OF LAW

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

ORDER

1. The Utility Reform Network is awarded \$34,635.00.
2. Within 30 days of the effective date of this decision, Southern California Gas Company, San Diego Gas & Electric Company, Pacific Gas and Electric Company, and Southwest Gas Corporation shall pay The Utility Reform Network their respective shares of the award, based on their California-jurisdictional gas revenues for the 2022 calendar year, to reflect the year in which the proceeding was primarily litigated. If such data are unavailable, the most recent gas revenue data shall be used. 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 February 15, 2025, the 75th day after the filing of The Utility Reform Network's request, and continuing until full payment is made.

3. The comment period for today's decision is not waived.
4. Rulemaking 20-01-007 is closed.

This decision is effective today.

Dated _____, at _____, California.

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D2409034		
Proceeding(s):	R2001007		
Author:	ALJ Van Dyken, ALJ Purchia		
Payer(s):	Southern California Gas Company, San Diego Gas & Electric Company, Pacific Gas and Electric Company, and Southwest Gas Corporation		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/ Disallowance
The Utility Reform Network	12-2-2024	\$106,083.75	\$34,635.00	N/A	See Part III.D CPUC Comments, Disallowances, and Adjustments

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Hayley	Goodson	Attorney	\$625	2023	\$625
Hayley	Goodson	Attorney	\$680	2024	\$680
Marcel	Hawiger	Attorney	\$455	2020	\$455
Marcel	Hawiger	Attorney	\$650	2021	\$650
Marcel	Hawiger	Attorney	\$670	2022	\$670
Marcel	Hawiger	Attorney	\$735	2023	\$735
Marcel	Hawiger	Attorney	\$240	2024	\$120
Camille	Stough	Attorney	\$275	2020	\$275
Camille	Stough	Attorney	\$370	2021	\$370
Camille	Stough	Attorney	\$380	2022	\$380

(END OF APPENDIX)