



Decision \_\_\_\_\_

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

MAY 19, 2023

08:00 AM

R2305018

Order Instituting Rulemaking to Update and Amend  
Commission General Order 131-D.Rulemaking 23-05-018  
(Filed May 18, 2023)

**INTERVENOR COMPENSATION CLAIM OF SIERRA CLUB  
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF SIERRA CLUB**

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

<b>Intervenor: Sierra Club</b>	<b>For contribution to Decisions:</b> D.23-12-035, D.25-01-055
<b>Claimed: \$ 64,297.78</b>	<b>Awarded: \$</b>
<b>Assigned Commissioner:</b> Karen Douglas	<b>Assigned ALJ:</b> Sophia Park and Rajan Mutialu
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).	
<b>Signature:</b>	/s/ Patrick Woolsey
<b>Date:</b> April 8, 2025	<b>Printed Name:</b> Patrick Woolsey

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

<b>A. Brief description of Decisions:</b>	D.23-12-035 adopts modifications to Commission General Order 131-D to conform it to the requirements of Senate Bill 529 (Hertzberg; Stats. 2022, ch. 357) and to correct outdated references. D. 25-01-055 adopts Commission General Order 131-E and resolves outstanding Phase 2 issues in Rulemaking 23-05-018.
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812<sup>1</sup>:**

	Intervenor	CPUC Verification
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	N/A	
2. Other specified date for NOI:	August 30, 2023	
3. Date NOI filed:	August 24, 2023	
4. Was the NOI timely filed?		
<b>Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):</b>		
5. Based on ALJ ruling issued in proceeding number:	Application ("A.") 21-12-009	
6. Date of ALJ ruling:	5/18/2022	
7. Based on another CPUC determination (specify):	N/A	
8. Has the Intervenor demonstrated customer status or eligible government entity status?		
<b>Showing of "significant financial hardship" (§1802(h) or §1803.1(b)):</b>		
9. Based on ALJ ruling issued in proceeding number:	A.21-12-009	
10. Date of ALJ ruling:	5/18/2022	
11. Based on another CPUC determination (specify):	N/A	
12. Has the Intervenor demonstrated significant financial hardship?		
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.25-01-055	
14. Date of issuance of Final Order or Decision:	February 7, 2025	
15. File date of compensation request:	April 8, 2025	
16. Was the request for compensation timely?		

<sup>1</sup> All statutory references are to California Public Utilities Code unless indicated otherwise.

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

#	Intervenor's Comment(s)	CPUC Discussion
1	No prehearing conference was set per the Assigned Commissioner's Scoping Memo and Ruling in this Rulemaking 23-05-018. Assigned Commissioner's Scoping Memo and Ruling ["Scoping Memo"] at 6, Footnote 13.	
2	A "customer who intends to seek an award of compensation must file and serve a notice of intent to claim compensation within 30 days after issuance of this scoping memo." Scoping Memo at 9. Sierra Club timely filed its NOI on August 24, 2023, within 30 days after the issuance of the Scoping Memo on July 31, 2023. The California Public Utilities Commission ("Commission") has not yet ruled on Sierra Club's Notice.	
3	Rule 17.3 of the Commission's Rules of Practice and Procedure provides 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, but in no event later than 60 days after the issuance of the decision <i>closing the proceeding</i> ." (emphasis added). Sierra Club made substantial contributions to both the Phase 1 decision (D.23-12-035) and the Phase 2 decision in this proceeding (D.25-01-055). Because the Phase 1 decision (D.23-12-035) did not close the proceeding, which remained open for Phase 2, Sierra Club's request for both phases is timely filed within 60 days after the Phase 2 decision (D.25-01-055).	

**PART II: SUBSTANTIAL CONTRIBUTION**  
**(to be completed by Intervenor except where indicated)**

**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><b>1. Conformance with SB 529 and need to define key terms:</b> Sierra Club’s comments on the Commission’s Phase 1 Proposed Decision identified the need to define the undefined terms “extension,” “expansion,” “upgrade” and “modification” when incorporating the requirements of Senate Bill 529 into General Order (“GO”) 131-D and recommended that the Commission establish a process to develop definitions for those terms. <i>See</i> Sierra Club Nov. 15, 2023 Opening Comments on Proposed Decision at 2-4. Decision 23-12-035 adopted Sierra Club’s recommendation after repeatedly citing Sierra Club’s comments. D.23-12-035 (Dec. 18, 2023) at 13-14.</p>	<p>Decision 23-12-035 stated that “several parties, including . . . Sierra Club, argue that the terms ‘extension, expansion, upgrade, or other modification’ are ambiguous and require further definition. . . Sierra Club argues that these terms are subject to a wide range of interpretations and that the distinction among the terms is also unclear. Sierra Club recommends that the Commission adopt clear definitions for an efficient process and to limit future disputes over classifications of transmission projects. We agree it would be useful to develop definitions or examples of the types of transmission projects that would qualify as an ‘extension, expansion, upgrade, or other modification.’ The record does not reflect a workable definition of these terms that would be consistent with SB 529. Therefore, we direct that Phase 2 of this proceeding include development of definitions of these terms.” D.23-12-035 (Dec. 18, 2023) at 13-14 (citing Sierra Club Nov. 15, 2023 Opening Comments on Proposed Decision at 2-3).</p>	

<p><b>2. Settlement Process in R.23-05-018:</b> Sierra Club engaged in the settlement process and expressed support for several elements of the Proposed Settlement, but opposed adoption of the settlement in Phase 1 because the settlement did not define “extension,” “expansion,” “upgrade” and “modification” or establish a process to define those terms. Sierra Club recommended that the Commission not approve the proposed settlement until those definitions are established. <i>See</i> Sierra Club Oct. 30, 2023 Comments on Joint Motion for Adoption of Settlement Agreement at 3-4, 9-10.</p>	<p>Decision 23-12-035 noted that “Sierra Club . . . filed comments opposing elements of the settlement agreement” in Phase 1 of the rulemaking proceeding. D.23-12-035 (Dec. 18, 2023) at 17 n.38, <i>see also</i> 16 n.36. After citing this opposition, Decision 23-12-035 declined to adopt the Proposed Settlement, concluding that the Proposed Settlement included Phase 2 issues and that “a record on Phase 2 issues has not yet been fully developed.” D.23-12-035 (Dec. 18, 2023) at 17. As noted above, Decision 23-12-035 directed that definitions for “extension,” “expansion,” “upgrade” and “modification” be developed in Phase 2, as recommended by Sierra Club. D.23-12-035 (Dec. 18, 2023) at 13-14.</p>	
<p><b>3. Definition of “extension” in GO 131-D/ GO 131-E:</b> Sierra Club proposed a definition of the term “extension” in its initial Phase 2 comments. <i>See</i> Sierra Club Feb. 5, 2024 Opening Comments on Phase 2 Issues at 4-6; Sierra Club Feb. 26, 2024 Reply Comments on Phase 2 Issues at 7-12. After Staff issued a proposed definition, Sierra Club commented on Staff’s proposal. Sierra Club June 28, 2024 Opening Comments on Phase 2 Staff Proposal at 3-5; Sierra Club July 15, 2024 Reply Comments on Phase 2 Staff Proposal at 5-7.</p>	<p>Commission Staff’s Phase 2 proposal included a proposed definition of “extension.” Staff Proposal for R.23-05-018 Phase 2 Updates to General Order 131-D (May 2024), at 16. Staff’s proposal repeatedly referenced Sierra Club’s proposed definition of this term. <i>Id.</i> at 27, 30. Decision 25-01-055 cited Sierra Club’s support for Staff’s proposed definition of “extension.” Decision 25-01-055 at 73 (citing Sierra Club Opening Comments on Phase 2 Staff Proposal). Decision 25-01-055 adopted a modified version of Staff’s proposed definition. <i>Id.</i> at 76-77. It appears that Sierra Club’s comments influenced the Staff proposal that was adopted in Decision 25-01-055.</p>	

<p><b>4. Definition of “expansion” in GO 131-D/ GO 131-E:</b> Sierra Club proposed a definition of the term “expansion” in its initial Phase 2 comments. <i>See</i> Sierra Club Feb. 5, 2024 Opening Comments on Phase 2 Issues at 6; Sierra Club Feb. 26, 2024 Reply Comments on Phase 2 Issues at 12-13. After Staff issued a proposal incorporating elements of Sierra Club’s proposed definition, Sierra Club commented on Staff’s proposal. Sierra Club June 28, 2024 Opening Comments on Phase 2 Staff Proposal at 5-6; Sierra Club July 15, 2024 Reply Comments on Phase 2 Staff Proposal at 7-9.</p>	<p>Commission Staff’s Phase 2 proposal included a proposed definition of “expansion” that incorporated elements of Sierra Club’s proposed definition of that term. Staff Proposal for R.23-05-018 Phase 2 Updates to General Order 131-D (May 2024), at 17. Staff’s proposal repeatedly referenced Sierra Club’s comments regarding this definition. <i>Id.</i> at 27, 31. Decision 25-01-055 referenced Sierra Club’s support for Staff’s proposed definition of “expansion.” Decision 25-01-055 at 74. Decision 25-01-055 adopted a modified version of Staff’s proposed definition. <i>Id.</i> at 77-78. It appears that Sierra Club’s comments influenced the Staff proposal that was ultimately adopted in Decision 25-01-055.</p>	
<p><b>5. Definition of “upgrade” in GO 131-D/ GO 131-E:</b> Sierra Club proposed a definition of the term “upgrade” in its initial Phase 2 comments. <i>See</i> Sierra Club Feb. 5, 2024 Opening Comments on Phase 2 Issues at 6-7; Sierra Club Feb. 26, 2024 Reply Comments on Phase 2 Issues at 13-14. After Staff issued a proposal incorporating elements of Sierra Club’s proposed definition, Sierra Club commented on Staff’s proposal. Sierra Club June 28, 2024 Opening Comments on Phase 2 Staff Proposal at 6-7; Sierra Club July 15, 2024 Reply Comments on Phase 2 Staff Proposal at 9-11.</p>	<p>Commission Staff’s Phase 2 proposal included a proposed definition of “upgrade” that incorporated elements of Sierra Club’s proposed definition of that term. Staff Proposal for R.23-05-018 Phase 2 Updates to General Order 131-D (May 2024), at 17-18. Staff’s proposal repeatedly referenced Sierra Club’s comments regarding this definition. <i>Id.</i> at 27, 31. Decision 25-01-055 referenced Sierra Club’s overall support for Staff’s proposed definition of “upgrade.” Decision 25-01-055 at 75. The Decision also notes Sierra Club’s proposed modifications of that definition to add a limiting phrase and remove overlapping language. <i>Id.</i> at 76. Decision 25-01-055 adopted a modified version of Staff’s proposed definition of “upgrade.” <i>Id.</i> at 78-79. While Decision 25-01-055 did not adopt Sierra Club’s proposed changes to Staff’s proposal, it appears that Sierra Club’s initial comments influenced the Staff proposal that was ultimately adopted in Decision 25-01-055.</p>	

<p><b>6. Definition of “modification” in GO 131-D/ GO 131-E:</b> Sierra Club proposed a definition of the term “modification” in its initial Phase 2 comments. <i>See</i> Sierra Club Feb. 5, 2024 Opening Comments on Phase 2 Issues at 7; Sierra Club Feb. 26, 2024 Reply Comments on Phase 2 Issues at 14-15. After Staff issued a proposal incorporating elements of Sierra Club’s proposed definition, Sierra Club commented on Staff’s proposal. Sierra Club June 28, 2024 Opening Comments on Phase 2 Staff Proposal at 8; Sierra Club July 15, 2024 Reply Comments on Phase 2 Staff Proposal at 11-12.</p>	<p>Commission Staff’s Phase 2 proposal included a proposed definition of “modification” that incorporated elements of Sierra Club’s proposed definition of that term. Staff Proposal for R.23-05-018 Phase 2 Updates to General Order 131-D (May 2024), at 18. Staff’s proposal repeatedly referenced Sierra Club’s comments regarding this definition. <i>Id.</i> at 27. Decision 25-01-055 referenced Sierra Club’s support for Staff’s proposed definition of “modification.” Decision 25-01-055 at 76. Decision 25-01-055 adopted a modified version of Staff’s proposed definition. <i>Id.</i> at 79. It appears that Sierra Club’s comments influenced the Staff proposal that was ultimately adopted in Decision 25-01-055.</p>	
<p><b>7. Definition of “existing electrical transmission facilities” in GO 131-D/ GO 131-E:</b> Sierra Club proposed a definition of the term “existing electrical transmission facility” in its initial Phase 2 comments. <i>See</i> Sierra Club Feb. 5, 2024 Opening Comments on Phase 2 Issues at 1-4; Sierra Club Feb. 26, 2024 Reply Comments on Phase 2 Issues at 2-4. After Staff issued a proposal incorporating elements of Sierra Club’s proposed definition, Sierra Club commented on Staff’s proposal. Sierra Club June 28, 2024 Opening Comments on Phase 2 Staff Proposal at 2-3; Sierra Club July 15, 2024 Reply Comments on Phase 2 Staff Proposal at 2-4.</p>	<p>Commission Staff’s Phase 2 proposal included a proposed definition of “existing electrical transmission facilities” that incorporated elements of Sierra Club’s proposed definition of that term. Staff Proposal for R.23-05-018 Phase 2 Updates to General Order 131-D (May 2024), at 15. Staff’s proposal repeatedly referenced Sierra Club’s comments regarding this definition. <i>Id.</i> at 22-25. Decision 25-01-055 referenced Sierra Club’s proposed modification to Staff’s proposed definition of “existing electrical transmission facilities,” and ultimately adopted Staff’s proposed definition. D.25-01-055 at 70-71. While Decision 25-01-055 did not adopt Sierra Club’s proposed changes to Staff’s proposal, it appears that Sierra Club’s initial comments influenced the Staff proposal that was ultimately adopted in Decision 25-01-055.</p>	



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

	<b>Intervenor's Assertion</b>	<b>CPUC Discussion</b>
<b>a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?<sup>2</sup></b>	Yes	
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	Yes	
<b>c. If so, provide name of other parties:</b> Environmental Defense Fund (EDF)		
<b>d. Intervenor's claim of non-duplication:</b> Sierra Club coordinated with EDF regarding proposed definitions of terms, and attempted to forge a broader consensus by consulting with other public-interest intervenors and utilities concerning the proposed settlement and definitions. However, Sierra Club ultimately developed a unique perspective on the questions presented to parties as compared with both EDF and other environmental organizations, raising distinctive concerns that garnered significant attention from Commission Staff.  Any duplication that did occur was either by design and part of Sierra Club's efforts to forge a stakeholder consensus for the benefit of the Commission, or unavoidable due to the large number of parties actively engaged in the case. Sierra Club's comments were productive because they provided original contributions that substantially assisted the Commission's deliberations and decision making. Sierra Club worked diligently to ensure that its involvement uniquely influenced the outcome of the final Decision.		

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

<b>#</b>	<b>Intervenor's Comment</b>	<b>CPUC Discussion</b>
	<b>Substantial Contribution.</b> Pursuant to Section 1802(j), "Substantial contribution" means that, in the judgment of the commission, the customer's presentation has substantially assisted the commission in the making of its order or decision because the order or decision has	

<sup>2</sup> 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 Comment	CPUC Discussion
	<p>adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer.”</p>	
	<p><b>Substantial Contribution Includes Enriching Deliberations and the Record.</b>  The Commission’s past decisions recognize that the Commission does not need to adopt an intervenor’s position on a particular issue for that intervenor to make a substantial contribution. D.08-04-004 at 4-5; D.19-10-019 at 3; D.03-03-031 at 6 (“substantial contribution includes evidence or argument that supports part of the decision even if the Commission does not adopt a party’s position in total”). Rather, intervenor substantially contribute when they have “provided a unique perspective that enriched the Commission’s deliberations and the record.” D.05-06-027 at 5. Intervenors also substantially contribute when they provide a full discussion of the matters at issue so as to allow the Commission “to fully consider the consequences of adopting or rejecting” the parties’ proposals, and when they “assist [] the Commission in the decision-making process.” D.08-04-004 at 5-6; D.19-10-019 at 4.</p>	
	<p><b>No Duplication.</b>  No reduction to Sierra Club’s compensation due to duplication is warranted given the standard adopted by the Commission in D.03-03-031 and consistent with Public Utilities Code Sections</p>	

#	Intervenor's Comment	CPUC Discussion
	<p>1801.3(b) &amp; (f), 1802(j), 1802.5, and 1803.</p> <p>Section 1803 sets forth the requirements for awarding intervenor compensation. Pub. Util. Code, § 1803; D.03-03-031 at 12-14. An award of compensation for reasonable fees for participation in a proceeding is required when an intervenor (1) complies with Section 1804 and (2) “satisfies both of the following requirements: (a) The customer’s presentation makes a substantial contribution to the adoption, in whole or in part, of the Commission’s order or decision. (b) Participation or intervention without an award of fees or costs imposes a significant financial hardship.” Pub. Util. Code. § 1803.</p> <p>Section 1801.3(f) seeks to avoid only (1) “unproductive or unnecessary participation that duplicates the participation of similar interests otherwise adequately represented” or (2) “participation that is not necessary for a fair determination of the proceeding.” Pub. Util. Code, § 1801.3(f); D.03-03-031 at 15-18. The “duplication language contained in the first dependent clause requires the compensation opponent to establish three elements – duplication, similar interests, and adequate representation.” D.03-03-031 at 18.</p> <p>Section 1802.5 provides for full compensation where participation “materially supplements,</p>	

#	Intervenor's Comment	CPUC Discussion
	<p>complements, or contributes to the presentation of another party.” Pub. Util. Code, § 1802.5; see also D.03-03-031 at 14.</p> <p>Additionally, the intervenor compensation statutory scheme is intended to “be administered in a manner that encourages the effective and efficient participation of all groups that have a stake in the public utility regulation process.” Pub. Util. Code § 1801.3(b).</p>	

**PART III: REASONABLENESS OF REQUESTED COMPENSATION**  
**(to be completed by Intervenor except where indicated)**

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

	CPUC Discussion
<b>a. Intervenor's claim of cost reasonableness:</b> Sierra Club's costs were reasonable in light of the scope and complexity of the numerous issues presented in this complex rulemaking proceeding.	
<b>b. Reasonableness of hours claimed:</b> Throughout the multiple rounds of comments in this proceeding, Sierra Club was careful to work efficiently and limit its participation on each phase to a reasonable and prudent amount of time that was proportional to the scope of the issues.	
<b>c. Allocation of hours by issue:</b> <ol style="list-style-type: none"> <li>1. Conformance with SB 529 and need to define key terms (17.7%)</li> <li>2. Settlement Process (22.0%)</li> <li>3. Definition of “extension” in GO 131-D/ GO 131-E (10.9%)</li> <li>4. Definition of “expansion” in GO 131-D/ GO 131-E (10.9%)</li> <li>5. Definition of “upgrade” in GO 131-D/ GO 131-E (10.9%)</li> <li>6. Definition of “modification” in GO 131-D/ GO 131-E (10.9%)</li> <li>7. Definition of “existing electrical transmission facilities” in GO 131-D/ GO 131-E (5.0%)</li> <li>8. General Participation (11.7%)</li> </ol>	

**B. Specific Claim:\***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Gregory Wannier	2023	29.0	536.52	Resolution ALJ-393 (Comment 1)	15,559.08			
Gregory Wannier	2024	31.5	558.35	Resolution ALJ-393 (Comment 1)	17,588.03			
Patrick Woolsey	2023	36.5	\$330.22	Resolution ALJ-393 (Comment 2)	12,053.03			
Patrick Woolsey	2024	44.0	\$343.66	Resolution ALJ-393 (Comment 2)	15,121.04			
Subtotal: \$60,321.18						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 \$
Leah Bahramipour	2023	6.0	122.56	Resolution ALJ-393 (Comment 3)	735.36			
Leah Bahramipour	2024	10.0	146.57	Resolution ALJ-393 (Comment 3)	1,465.70			
Subtotal: \$2,201.06						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Gregory Wannier	2025	3	288.84	Resolution ALJ-393 (Comment 1)	866.51			

CLAIMED						CPUC AWARD		
Patrick Woolsey	2025	4	177.78	Resolution ALJ-393 (Comment 2)	711.10			
Thomas Phillips	2025	3	65.98	Resolution ALJ-393 (Comment 4)	197.94			
<b>Subtotal: \$1,775.55</b>						<b>Subtotal: \$</b>		
COSTS								
#	Item	Detail		Amount	Amount			
1.								
2.								
<b>Subtotal: \$</b>						<b>Subtotal: \$</b>		
<b>TOTAL REQUEST: \$64,297.78</b>						<b>TOTAL AWARD: \$</b>		
<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>								
ATTORNEY INFORMATION								
Attorney		Date Admitted to CA BAR <sup>3</sup>		Member Number		Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation		
Gregory Wannier		1/25/2011		275349		No		
Patrick Woolsey		12/23/2019		329891		No		

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

<sup>3</sup> This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Timesheets
Comment 1	<p>Sierra Club requests an hourly rate of \$536.52 in 2023, \$558.35 in 2024, and \$577.67 in 2025 for Gregory Wannier.</p> <p>Mr. Wannier received his J.D. from Stanford Law School in 2010, and simultaneously earned an M.S. in environment and resources from Stanford’s School of Earth Sciences. He has been a practicing attorney for 14 years and an attorney with Sierra Club’s Environmental Law Program for approximately 11 years.</p> <p>The requested rates for Mr. Wannier are based on the Hourly Rate Chart adopted in Resolution ALJ-393, which places him at Level IV for attorneys with 10-15 years of experience. Mr. Wannier has over 14 years of experience in 2025. The Commission has not previously established a rate for Mr. Wannier.</p> <p>For claim preparation, Sierra Club proposes an hourly rate of \$288.84, representing half of Mr. Wannier’s 2025 rate.</p> <p>Mr. Wannier’s timesheet is included in Attachment 2.</p>
Comment 2	<p>Sierra Club requests an hourly rate of \$330.22 in 2023, \$343.66 in 2024, and \$355.55 in 2025 for Patrick Woolsey.</p> <p>Mr. Woolsey received his J.D. from Yale Law School in 2019, and simultaneously received a Master’s degree in Environmental Management from Yale School of the Environment. He has been a practicing attorney for 5.5 years and an attorney with Sierra Club’s Environmental Law Program for over 3 years, specializing in utility law and environmental law. Prior to Sierra Club, Mr. Woolsey worked at a private environmental law firm. He has represented Sierra Club in public utility litigation and other proceedings in Arizona, Nevada, Minnesota, and Florida.</p> <p>The requested rates for Mr. Woolsey are based on the Hourly Rate Chart adopted in Resolution ALJ-393, which places him at Level II for attorneys with 2-5 years of experience. Mr. Woolsey has over five years of experience in 2025. The Commission has not previously established a rate for Mr. Woolsey.</p> <p>For claim preparation, Sierra Club proposes an hourly rate of \$177.78, representing half of Mr. Woolsey’s 2025 rate.</p>

Attachment or Comment #	Description/Comment
	Mr. Woolsey's timesheet is included in Attachment 2.
Comment 3	<p>Sierra Club requests an hourly rate of \$122.56 in 2023 and \$146.57 in 2024 for Leah Bahramipour. Ms. Bahramipour joined Siena Club as a legal assistant in July 2022. She graduated from New York University with a B.A. in Environmental Studies and Politics in May 2022.</p> <p>Based on the Hourly Rate Chart adopted in Resolution ALJ-393 and Ms. Bahramipour's 2-5 years of experience, Sierra Club requests an hourly rate of \$122.56 in 2023 (the Median rate for a Level I paralegal). For Ms. Bahramipour's 2024 rate, Sierra Club requests \$146.57 (the Median Rate for a Level II paralegal).</p> <p>Ms. Bahramipour's timesheet is included in Attachment 2.</p>
Comment 4	<p>Sierra Club requests an hourly rate of \$131.96 in 2025 for Thomas Phillips. Mr. Phillips joined Siena Club as a legal assistant in February 2025. He graduated from University of California-Davis with a B.S. in Ecology in March 2023.</p> <p>Based on the Hourly Rate Chart adopted in Resolution ALJ-393 and Mr. Phillips' 0-1 year of experience, Sierra Club requests an hourly rate of \$131.96 in 2025 (the Median rate for a Level I paralegal).</p> <p>For claim preparation, Sierra Club proposes an hourly rate for Thomas Phillips of \$65.98, representing half of his 2025 rate. Mr. Phillips did not participate in any work on this project except for preparation of the claim, so claim preparation is the only work he should be compensated for.</p> <p>Mr. Phillips' timesheet is included in Attachment 2.</p>

**D. CPUC Comments, 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))**

<b>A. Opposition: Did any party oppose the Claim?</b>	
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If so:

Party	Reason for Opposition	CPUC Discussion

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

Party	Comment	CPUC Discussion

**(Green items to be completed by Intervenor)**

**FINDINGS OF FACT**

1. **Sierra Club** [has/has not] made a substantial contribution to D. 23-12-035 and D.25-01-055.
2. The requested hourly rates for **Sierra Club**'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. **Sierra Club** is awarded \$\_\_\_\_\_.
2. Within 30 days of the effective date of this decision, \_\_\_\_\_ shall pay **Sierra Club** the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay **Sierra Club** 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. If such data are unavailable, the most recent [industry type, for example, electric] 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 [date], the 75<sup>th</sup> day after the filing of **Sierra Club**’s request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.

This decision is effective today.

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

**APPENDIX****Compensation Decision Summary Information**

<b>Compensation Decision:</b>		<b>Modifies Decision?</b>	
<b>Contribution Decision(s):</b>	23-12-035, 25-01-055		
<b>Proceeding(s):</b>	R.23-05-018		
<b>Author:</b>			
<b>Payer(s):</b>			

**Intervenor Information**

<b>Intervenor</b>	<b>Date Claim Filed</b>	<b>Amount Requested</b>	<b>Amount Awarded</b>	<b>Multiplier?</b>	<b>Reason Change/Disallowance</b>
<b>Sierra Club</b>	April 8, 2025	<b>\$64,297.78</b>		N/A	

**Hourly Fee Information**

<b>First Name</b>	<b>Last Name</b>	<b>Attorney, Expert, or Advocate</b>	<b>Hourly Fee Requested</b>	<b>Year Hourly Fee Requested</b>	<b>Hourly Fee Adopted</b>
Gregory	Wannier	Attorney	\$536.52	2023	
Gregory	Wannier	Attorney	\$558.35	2024	
Gregory	Wannier	Attorney	\$577.67	2025	
Patrick	Woolsey	Attorney	\$330.22	2023	
Patrick	Woolsey	Attorney	\$343.66	2024	
Patrick	Woolsey	Attorney	\$355.55	2025	
Leah	Bahramipour	Paralegal	\$122.56	2023	
Leah	Bahramipour	Paralegal	\$146.57	2024	
Thomas	Phillips	Paralegal	\$131.96	2025	

Revised March 2023

**(END OF APPENDIX)**