



PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

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June 20, 2025

Agenda ID #23588
Ratesetting

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

This is the proposed decision of Administrative Law Judges David Van Dyken and 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 **7/24/2025** 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: smt

Attachment

Decision **PROPOSED DECISION OF ALJ VAN DYKEN AND ALJ PURCHIA**
(Mailed 6/20/2025)

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 INTERVENOR COMPENSATION TO
CENTER FOR ACCESSIBLE TECHNOLOGY FOR
SUBSTANTIAL CONTRIBUTION TO DECISIONS 23-12-003 AND 24-09-034**

Intervenor: Center For Accessible Technology (CforAT)	For contribution to Decisions (D.) 23-12-003 and D.24-09-034
Claimed: \$95,543.25 ¹	Awarded: \$34,879.75
Assigned Commissioner: Karen Douglas	Assigned ALJs: David Van Dyken and Robyn Purchia

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	<p>Decision (D.) 23-12-003 (the Phase 2 Decision) adopted review criteria and information requirements for gas utility applications proposing to repair or replace transmission pipeline infrastructure, including criteria to determine when declining demand can enable transmission pipelines to be derated or decommissioned without adversely impacting reliability. It also required gas utilities to provide an information-only submittal describing planned transmission pipeline derations.</p> <p>D.24-09-034 (the Final Decision) partially granted a Petition to modify D.22-12-021 (the General Order (GO) Decision) previously issued in this proceeding. It also noted additional issues relevant to the issue of long-term planning for the natural gas system in California which are not scoped in the proceeding and closed the proceeding to allow for a new rulemaking on natural gas planning.</p>
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¹ Arithmetic error detailed in Part III B footnotes. Correct total request is \$95,354.75.

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812²:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of prehearing conference:	March 24, 2020	Verified
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	April 15, 2020; <i>see</i> also comment below.	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:	Rulemaking (R.) 20-01-007; <i>see</i> also comment below	Verified
6. Date of ALJ ruling:	May 29, 2020	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.20-01-007; <i>see</i> also comment below	Verified
10. Date of ALJ ruling:	May 29, 2020	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:	October 2, 2024	Verified
15. File date of compensation request:	November 22, 2024	Verified
16. Was the request for compensation timely?		Yes

² All statutory references are to California Public Utilities Code unless indicated otherwise.

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
3	In addition to our initial NOI filed on April 15, 2020, CforAT filed an Updated NOI at the start of Track 2 on November 3, 2021.	Verified
5-7; 9-11	CforAT has previously been found eligible for compensation and has been awarded compensation in this proceeding for our substantial contributions to D.22-12-021. <i>See</i> D. 24-05-028. "A party found eligible for an award of compensation in one phase of a proceeding remains eligible in later phases...in the same proceeding." CPUC Rules of Practice and Procedure, Rule 17.2.	Verified in part. Decision granting compensation related to D.22-12-021 is D.24-05-018 not D.24-05-028.

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
Background/Phase 1 (consisting of Track 1A and Track 1B): CforAT joined this proceeding when it was first initiated, filing a Motion for Party Status on February 11, 2020. From the start, CforAT noted that the issues we expected to address on behalf of our constituency of gas utility customers with disabilities and medical vulnerabilities did not include Phase 1 (addressing	In keeping with our anticipated plan for participation, our time records show that CforAT appropriately kept track of general activity in the early stages of the proceeding, including initial comments, participation at the PHC, and other activity leading to the issuance of the Scoping Memo on April 3, 2020. While Phase 1 was active, CforAT appropriately continued to monitor the docket, expending only small amounts of time while conducting sufficient review to ensure that the interests of our constituency were not subject to	Noted. Pursuant to Rule 17.4(a), the request shall specify the pages, findings, conclusions and/or ordering paragraphs in the Commission decision which resolve the issue. As they did not cite any pages in the Commission decision, CforAT's claimed contributions

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>issues of system reliability (Track 1A) and regulatory coordination between gas utilities and gas-fired electric utilities (Track 1B)). Rather, CforAT anticipated participation in Phase 2 of the proceeding "in order to address issues concerning development of a long-term planning strategy to manage the state's transition away from natural gas-fueled technologies." CforAT Motion for Party Status at p. 1.</p> <p>CforAT further noted that our constituency is both disproportionately low-income and highly reliant on affordable and reliable energy service to support their ability to live independently, making representation of these customers in Phase 2 vital to ensure their protection.</p> <p>CforAT Motion for Party Status at pp. 1-2.</p> <p>CforAT reiterated these expectations in our NOI, filed on April 15, 2020, noting our intent to monitor Track 1 and then actively participate in Track 2.</p>	<p>negative impacts by ongoing activity in the proceeding.</p> <p>As discussed in greater detail below, this allocation of time is not memorialized in any decision, but it represents appropriate professional competence by counsel acting on behalf of a group of vulnerable customers. As part of our showing regarding reasonableness, CforAT details how our participation was productive and necessary for a fair determination of issues with regard to the needs of our constituency. <i>See</i> CPUC Intervenor Compensation Program Guide, available at https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/administrative-law-judge-division/documents/icompmaterials/updated-icompprogram-guide-april-2017.pdf, at p. 21. In order for CforAT to be productive in Track 2, it was necessary and appropriate to engage in limited monitoring of the initial activity in the proceeding as well as the work in Phase 1.</p>	<p>to Background/Phase 1 are not compliant with Rule 17.4(a) and Section 1802(j). <i>See</i> Part III. D [1].</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>CforAT NOI at pp. 4- 5 (Planned Participation). We expressly stated our expectation that we would engage in “basic monitoring of Track 1 to ensure that we do not miss opportunities to protect the interests of our constituency.” CforAT NOI at p. 5 (Estimated Budget by Issues).</p>		
<p>Phase 2 (also referred to as Track 2):</p> <p>Track 2 was scoped in an Assigned Commissioner's Amended Scoping Memo and Ruling issued on October 14, 2021. Phase 2 (referenced as Track 2 in the Scoping Memo) was further divided into Track 2a, 2b, and 2c. Track 2a included the question of whether the Commission should adopt a new General Order (GO) for gas infrastructure projects, which was resolved with the issuance of D.22-12-021 (the GO Decision).</p> <p>Outside of the GO Decision, parties participated in multiple workshops and submitted multiple rounds of written comments to address the range of issues raised in conjunction with Track 2.</p>	<p>CforAT's work on the issue of adopting a new GO for gas infrastructure projects was addressed in D.24-05-028, awarding compensation for CforAT's substantial contributions to the GO Decision. CforAT has not resubmitted any time that was previously claimed for work leading to the GO Decision.</p> <p>Following the submission of initial party comments on the scope of issues for Track 2, on January 5, 2022, the Commission issued an Amended Scoping Ruling addressing Track 2. The Phase 2 Decision notes that this Amended Scoping Ruling (which it calls the “October Ruling”) was issued “taking into account comments on the October Ruling.” Phase 2 Decision at p. 3. While the Amended Scoping Ruling does not specifically identify party input from comments on the initial scoping memo, it highlights the plan for the Commission to “consider equity challenges not in isolation, but as part of all decision-making relating to gas system planning, recognizing that these issues are interwoven with</p>	<p>Verified in part. CforAT's work was addressed in D.24-05-018 not D.24-05-028.</p> <p>As acknowledged in CforAT's Reply Comments filed on June 27, 2022, the statement on Amended Scoping Memo at p.3 addresses a concern supported by virtually all parties and stakeholders, so this is not a contribution unique to CforAT.</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>CforAT's written submissions addressing Track 2 issues other than adoption of a new GO include the following:</p> <ul style="list-style-type: none"> • Opening Comments on the scope of issues for Track 2, filed on November 2, 2021; • Opening Comments on Track 2A Scoping Questions (b)-(k), filed on June 15, 2022; and • Reply Comments on Track 2A Scoping Questions (b)-(k), filed on June 27, 2022. <p>CforAT also participated in the multiple workshops held on various Track 2 issues which informed the ultimate resolution of such issues by the Commission.</p> <p>CforAT's initial written submission in Track 2 focused primarily on the importance of promptly addressing natural gas affordability without delay</p>	<p>all aspects of gas system operations. These issues will also be the focus in a specific sub-track." Amended Scoping Memo at p. 3. This statement appears to respond to CforAT's concerns about the need to focus on equity in a clear and prompt manner, an important procedural contribution.</p> <p>Finally, the Phase 2 Decision explicitly recognizes CforAT's focus on the need to consider rate impacts and reliability, each of which are vital for our constituency of customers with disabilities and medical needs. <i>See</i> Phase 2 Decision at p. 18. While CforAT's input is not otherwise directly cited, the Phase 2 Decision seeks to balance reliability concerns with rate impacts. It also notes the value of consistency among all applications considering gas infrastructure projects. <i>See</i> Phase 2 Decision at p. 42, FOFs 9-10 and p.45, COLs 4-5. This need for consistency among proceedings was also stressed by CforAT.</p> <p>CforAT's ongoing input informed the Commission's consideration of these issues and its deliberations in reaching its Phase 2 Decision, while also reflecting the needs of a unique population. This input represents a substantial contribution sufficient to support an award of compensation.</p>	<p>Noted. The Phase 2 Decision cites CforAT's agreement with SDG&E/SoCalGas's emphasis on the need to consider reliability and resiliency and rate impacts. CforAT's</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>(11/2/21 Comments at pp. 1-2); the need to specifically consider impacts of any action taken by the Commission on decommissioning for the impacts on residential customer rates and bills (id. at p. 3); the need to maintain focus on issues impacting residential customers separate from industrial/commercial customers (pp. 3-5); and the need to focus on system cost reduction, not just rate design, in addressing bill impacts (p. 6).</p> <p>CforAT's subsequent written comments continued this focus on issues of affordability and bill impacts, particularly as they are likely to affect our vulnerable constituency who not only are disproportionately low-income but who are also highly impacted by health impacts from air pollution and risks of climate change.</p> <p>In comments filed on 6/15/22, CforAT noted our prior request for the Commission to take up equity issues separately from</p>		<p>contribution here is limited.</p> <p>Noted. The CPUC acknowledges CforAT's participation, but we remind CforAT that participation by itself is not a substantial contribution and compensation will be adjusted according to intervenor's impact on the decision.</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>the more technical issues and the Commission's determination instead to integrate equity and affordability into all aspects of the docket; CforAT continued to urge a diligent focus on these concerns as they are interwoven with other gas infrastructure issues. 6/15/22 Comments at pp. 2-3. Identified affordability issues include customers stranded on gas systems while forced to cover system costs; identified equity issues include public health impacts of air quality, pollution and gas leaks. 6/15/22 Comments at pp. 3-7. CforAT specifically recommended that equity criteria be part of any evaluation of whether infrastructure should be repaired or replaced, and that consideration of non-pipeline alternatives include review of equity benefits (such as improved public health) as well as direct dollar costs. 6/15/22 Comments at pp. 7-8; <i>see also id.</i> at pp. 9-12.</p> <p>In subsequent reply comments filed on June 27, 2022, CforAT continued to focus on the need to focus efforts on restructuring the</p>		

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>gas system in ways that are cost effective and equitable, including the need to consider external costs and benefits, and to work across proceedings to ensure equitable decommissioning. <i>See generally</i> 6/27/22 Reply Comments.</p>		
<p>Staff Proposal on Decommissioning:</p> <p>In December of 2022, the Commission issued a Ruling and staff proposal identifying option to facilitate “pruning” of the gas distribution system and invited input from parties. On February 24, 2023, CforAT provided comments on the staff proposal, as did numerous other parties. <i>See</i> CforAT Comments on Staff Gas Infrastructure Decommissioning Proposal (CforAT Comments on Staff Proposal), filed on February 24, 2023.</p> <p>Among other recommendations made by CforAT in comments, we noted the need for additional thoughtful consideration of numerous decommissioning issues by the Commission, including the following:</p>	<p>In the Assigned Commissioner’s Ruling Scheduling Phase 3 Prehearing Conference, newly assigned Commissioner Karen Douglas noted the issuance of the staff proposal and the extensive party input provided in response, then stated, “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.” Phase 3 Ruling at pp. 2-3.</p> <p>To the extent that party input on the Staff Proposal, including the input of CforAT, informed the determination of the Assigned Commissioner to defer further consideration of the Staff Proposal at that time because more information was needed, this is a procedural contribution that warrants compensation. <i>See New Cingular Wireless PCS, LLC v. Public Utilities Commission</i>, 246 Cal.App.4th 784 (Cal. Ct. App. 2016); <i>New Cingular Wireless PCS, LLC v. Pub. Utils. Comm’n</i>, 21 Cal.App.5th 1197, 1203; 231 Cal. Rptr. 3d 91 (Cal. Ct. App. 2018) (time spent by intervenors making a procedural contribution is eligible for compensation)</p>	<p>Noted. However, as stated in the IComp Program Guide pp. 4, “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 issue of the staff proposal on decommissioning was not resolved in D.23-12-003 or D.24-09-034, so it is not compensable.</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<ul style="list-style-type: none"> • The need to address tensions between the various key goals of the Commissioning as articulated in the Staff Proposal, as well as the additional recommended goal of affordability. CforAT Comments on Staff Proposal at pp. 1-2; • The need to consider customer bill impacts in conjunction with consideration of system costs. CforAT Comments on Staff Proposal at pp. 2-3; • The need to consider indoor air quality as a factor for prioritization of projects among communities, in addition to consideration of other health variables such as asthma rates and ground-level ozone. CforAT Comments on Staff Proposal at p. 3; • The need to consider both short-term and long-term affordability impacts. CforAT Comments on Staff Proposal at p. 4; • The need to consider public health benefits along with direct financial costs and benefits while setting priorities. CforAT 	<p>If the Commission determines that this procedural contribution is not subject to compensation at this time, CforAT requests that time designated as work in response to the Staff Proposal be included with other work on Phase 3 for consideration in the successor proceeding to this docket, R. 24-09-012, presuming that the issues raised in the Staff Proposal will be revisited in that docket (even if the exact proposal is not reissued).</p>	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>Comments on Staff Proposal at pp. 4-5;</p> <ul style="list-style-type: none"> • The importance of community champions, especially in early decommissioning action, as well as the need to provide resources and support for those potential community champions to enable them to take on such work. CforAT Comments on Staff Proposal at pp. 6-9; • The need for a forum outside of complex GRCs to consider decommissioning projects to support participation by stakeholders without resources to participate in a GRC. CforAT Comments on Staff Proposal at p. 10 & p. 11; • The need to address legal issues regarding utility obligation to serve. CforAT Comments on Staff Proposal at p. 12 & p. 15; • The need to encourage a broad array of interested stakeholders in identifying potential non-pipeline alternatives as well as to explore all possible funding sources beyond ratepayers. CforAT Comments on 		

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
Staff Proposal at pp. 13-14		
<p>GO 177 Implementation and PFM:</p> <p>Following the adoption of GO 177, CforAT appropriately participated in the process for review of the annual reports produced by the gas utilities, including reviewing materials, attending the scheduled annual workshop, and coordinating with other parties regarding the effectiveness of the reports and the workshop.</p> <p>CforAT did not participate in bringing the Petition for Modification regarding the implementation of various requirements of GO 177 but did participate by commenting in response to the PFM, informed by our experience in the annual report and review process. <i>See</i> CforAT Response in Support of PFM, filed on March 11, 2024.</p> <p>CforAT also addressed the Proposed Decision granting in part and denying in part the PFM (the PFM PD). CforAT Comments on the</p>	<p>The time spent by CforAT engaging with the annual reports and the workshop process was necessary for our understanding of the effectiveness of the new GO and our analysis supporting our ongoing input to the Commission, including our support for the PFM.</p> <p>Based on this work and CforAT's written input, CforAT demonstrates substantial contributions as follows:</p> <ul style="list-style-type: none"> • While the Final Decision does not directly cite to CforAT in its discussion on piecemealing and declines to modify the GO on the issue, it takes action consistent with CforAT's recommendation in comments on the PFM PD by adding a statement indicating even as it declines to grant the modification that the gas utilities should "not interpret this denial as permission to piecemeal." <i>See</i> PFM PD Rev. 1 (Redline) at p. 11. • While the Final Decision does not adopt changes to the reporting requirements sought in the PFM, it also cautions the gas utilities not to interpret the denial as permission to ignore party comments. Final Decision at p. 14. The Final Decision further recognizes the intent of GO 177 to 	<p>Verified, in part.</p> <p>Although the decision does reference CforAT, CforAT's comments primarily reiterated what petitioners argued and their contribution did not substantially affect the decision-making process (e.g. CforAT's 3/11/24 Response in Support of PFM).</p> <p>As stated in D.24-09-034, pg. 18, "we ... determine that the Center for Accessible Technology... do[es] not provide evidence to support the Petitioners' request."</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>Decision Partially Granting the Petition to Modify Decision 22-12-021 (Comments on the PFM PD), filed on September 12, 2024.</p> <p>In CforAT's Response in Support of the PFM, we addressed efforts to preclude "piecemealing," <i>id.</i> at pp. 2-3; revisions to reporting requirements, <i>id.</i> at pp. 3-4; and the need to identify a process for raising disputes. <i>Id.</i> at pp. 4-5.</p> <p>In CforAT's Comments on the PFM PD, CforAT further addressed the issue of piecemealing, <i>id.</i> at pp. 2-3, and the process for dispute resolution. <i>Id.</i> at pp. 3-5.</p>	<p>strengthen public participation and ensure stakeholder input, and notes appreciation for party participation in the reporting process. Final Decision at p. 14. This acknowledgement is directed toward Petitioners, but applies equally to CforAT, as does the direction to utilities to address stakeholder concerns to the extent feasible. <i>Id.</i></p> <ul style="list-style-type: none"> The Commission specifically noted CforAT's request for guidance with regard to any process for resolving disputes about a gas utility's safety exemption claim and provided clarification that dispute resolution is available through the Commission's complaint process. Final Decision at p. 9 	<p>The Commission notes that many of CforAT's inputs on piecemealing and safety exemption and process for dispute resolution reiterated what the petitioners argued, and its efforts did not substantially contribute to the proceeding's outcomes (e.g. CforAT's 9/12/24 Comments on the PFM PD).</p>
<p>Phase 3: CforAT worked actively in Phase 3 of this proceeding, including commenting on the proposed scope of Phase 3 (as set out in an Assigned Commissioner's Ruling), attending a Phase 3 PHC, and drafting comments on the Joint Agency White Paper and CARB Scoping Plan provided to parties. As authorized in the Final Decision, CforAT intends to</p>	<p>While CforAT's recommendations are not expressly cited, the Final Decision takes the actions requested, including specifying the filings and procedural activities identified by CforAT as appropriate for carrying over to the successor proceeding. Specifically, the Final Decision states: "[P]arties who commented on the Phase 3 Scope and Schedule due on March 13, 2024, participated in the March 19, 2023 prehearing conference, and commented on the Joint Agency Staff White Paper due on April 15, 2024</p>	<p>Noted.</p> <p>CforAT Comments on the PFM PD at pp.6-8 were addressed in the final decision.</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>carry this time over to the successor proceeding on gas planning, R.24-09-012.</p> <p>CforAT affirmatively sought this clarification in the Final Decision to ensure that effective work by intervenors in this proceeding will be considered for compensation, noting that “the new OIR will build on work completed in this proceeding.” CforAT Comments on PFM PD at p. 6. On this basis, CforAT requested that the PD be revised “to clearly state that any eligible intervenors, including but not limited to CforAT, who have conducted work on Phase 3 tasks and issues in this docket will be eligible to seek compensation for the time spent on this work in the new rulemaking, along with compensation for time spent on procedural matters such as attendance at the Phase 3 PHC.” CforAT Comments on PFM PD at p. 7. CforAT cited to other proceedings where similar transfers of time were authorized. CforAT Comments on PFM PD at pp. 7-8.</p>	<p>(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.” Final Decision at p. 19.</p> <p>Additionally, as discussed above, given the statement in the February 22, 2024 ACR that action on the Staff Proposal issued in December, 2022 would be taken up at a later date, time spent addressing the Staff Proposal should also be authorized to be carried over if it is not compensated now based on parties’ procedural contributions.</p>	

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

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?³	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: On Track 2 Issues: Multiple parties touched on equity concerns and bill impacts in ways that aligned with CforAT's position, including CEJA/Sierra Club, TURN, and NRDC. On the PFM: Petitioners (CEJA, EDF, Sierra Club, SCGC and TURN), and UCAN.		Noted; SBUA also shared a similar stance on PFM.
d. Intervenor's claim of non-duplication: While CforAT's position on various issues aligned with those of other parties, our input at all times reflected the concerns of our unique constituency of utility customers with disabilities, medical needs and chronic health conditions. These populations stand at an intersection of concerns impacted by this proceeding in that they are disproportionately low-income, making it difficult for them to move away from natural gas on their own while putting them at risk based on affordability impacts if they are among the last customers on a natural gas system with high costs. These customers are also more likely to deal with health impacts stemming from the natural gas system, including living in communities with higher rates of air pollution and living with asthma or other chronic health concerns. Finally, this population is highly dependent on affordable and reliable energy delivery to support their ability to live independently in their community. For all of these reasons, it is important for this vulnerable constituency to have direct representation in policy proceedings considering the best approach to planning for reductions in reliance on natural gas in California. The concerns of CforAT's constituency overlap concerns of other consumer advocates and environmental advocates, including environmental justice advocates. To the extent reasonable, CforAT coordinated with other parties in order to avoid duplication and promote efficiency. For example, as noted above, CforAT did not participate in the PFM on GO 177 issues, but we did respond in support of the petition on behalf of our constituency. Similarly, CforAT did not focus on the more technical aspects of this proceeding, but concentrated our resources on those issues that have the most direct impact on residential customers generally and our constituency in particular.		Noted

³ The Office of Ratepayer Advocates was renamed the Public Advocates Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

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>This proceeding is focused on ways to manage reduced demand for natural gas in a way that advances California’s climate goals and reduces the risk that vulnerable customers will bear disproportionate burdens supporting the system during the time of transition. This includes concerns about cost burdens as well as public health burdens. These efforts are critical for CforAT’s constituency of utility customers with disabilities, medical needs, and chronic health conditions. These customers are disproportionately low-income, so they are at risk of being unable to transition to clean energy sources, forcing them to support stranded assets. They are also more likely to live in communities that suffer public health impacts of natural gas, including air pollution and high incidents of asthma. An effective long-term plan to manage the clean energy transition will substantially benefit this population.</p> <p>While it is difficult to provide a direct dollar benefit associated with policies to support an equitable and affordable clean energy transition, the Commission’s efforts in this regard will directly impact CforAT’s constituency, and effective policies will support affordability and public health impacts for these customers. The support provided by CforAT to the Commission’s efforts will provide broad benefit to these customers, in the form of more affordable energy and improved public health, in an amount greater than the amount of compensation we are requesting.</p>	<p>Noted, but <i>see</i> CPUC disallowances and adjustments in Section III.D.</p>
<p>b. Reasonableness of hours claimed:</p> <p>General:</p> <p>Consistent with the showing made by CforAT in our prior request for compensation in this docket, our work has been led by Legal Director Melissa W. Kasnitz, an experienced practitioner who has worked before the Commission on affordability issues and matters of energy policy as they impact CforAT’s constituency for a number of years. Ms. Kasnitz’s experience allows her to participate effectively and efficiently. In addition, limited tasks were conducted by Paul Goodman, also an experienced practitioner based on conflicts with Ms. Kasnitz’s schedule. Specifically, Mr. Goodman attended several workshops on behalf of CforAT and assisted in drafting limited sections of comments. It was appropriate and reasonable for Mr. Goodman to assist in this manner.</p>	<p>Noted. <i>See</i> CPUC disallowances and adjustments in Section III.D.</p>

	CPUC Discussion
<p>To the extent that CforAT took positions that were the same as other parties, it is due to the significance of the issues under review for multiple constituencies, and CforAT retained our focus on the needs of our unique constituency of customers with disabilities and/or medical vulnerabilities. This perspective added to the record and provided important insights for the Commission to consider. For this reason, CforAT's compensation request should not be reduced based on duplication of effort.</p> <p>Additionally, as noted above, CforAT's input supported various procedural conclusions made by the Commission, including with regard to the Staff Proposal on Decommissioning. To the extent that the Commission declines to address these procedural contributions here, it would be reasonable for the Commission to authorize CforAT and other intervenors to carry time spent on this portion of the proceeding over to R.24.09-012. However, it is fully appropriate for these hours to be compensation now.</p> <p>Time on matters of overall professional responsibility:</p> <p>In its recent review of compensation requests, the Commission has indicated reluctance to provide compensation for activities that are matters of overall professional responsibility, even if there is no identifiable link between the activity and a specific element of a Commission decision. In some situations, such as CforAT's input on the Staff Proposal discussed above, there is a clear link to a procedural determination by the Commission, which supports an award of compensation. In other instances, such as CforAT's limited monitoring of Phase 1 in this docket, it is appropriate and reasonable for counsel to take action to ensure that the interests of our constituency are not overlooked or negatively impacted during the course of Commission consideration of matters where CforAT has determined it would not be an overall effective use of time to participate more actively. Additionally, it was necessary for CforAT to monitor Phase 1 to ensure that we remain in compliance with Rule 1.1 of the Commission's Rules of Practice and Procedure and to ensure that we were appropriately aware of matters addressed in Phase 1 as the proceeding advanced to Phase 2. Similarly in Phase 2, CforAT appropriately allocated a limited amount of time to keeping track of activity on issues where we were not actively participating to monitor for potential impact on our constituency and/or to determine if participation would be appropriate. If the Commission were to deny compensation for these activities, it would have the perverse effect of causing counsel to determine that it is best <i>not</i> to sit out of a particular phase of a proceeding, and to spend</p>	

	CPUC Discussion
<p>more time participating, in order to avoid a situation where limited monitoring might be more efficient overall.</p> <p>Finally, the Commission has also indicated reluctance to award compensation for other activities that are vital for effective representation, including for example time spent reviewing party reply comments on a proposed decision and time spent reviewing revisions to a PD before a vote is taken. While this time (which is generally modest) most frequently does not result in a direct contribution to a final decision, it is necessary to ensure that there are no errors introduced by other parties in reply comments or in the revision process. If an error is identified, as happens at times, this professional review allows a party such as CforAT to take appropriate action, whether that is ex parte activity to call attention to the error, a motion to strike or other procedural action to call attention to a problem or concern, or other appropriate advocacy. It would not be reasonable for the Commission to incentivize intervenors to avoid acting responsibly by adding to their (already determined) financial hardship thorough failure to provide reasonable compensation for necessary professional actions. Other parties such as the regulated utilities whose legal counsel are funded by ratepayers are not challenged for engaging in these fully appropriate professional activities.</p> <p>Time on Compensation:</p> <p>CforAT has not historically provided a discussion of our time spent on compensation matters in addressing our substantial contributions to a proceeding. However, the Commission has recently demanded increased specificity in identifying the specific contributions of particular tasks rather than relying on an overall determination of substantial contribution in a proceeding to support an award of compensation. Because of this increased demand for specificity, CforAT has had to expend time tracing contributions with a greater level of detail than has previously been required. Particularly for a complex compensation request such as this one, addressing several formal decisions as well as several requests from the Commission for party input that did not result in a final resolution of the issues put out for comment, CforAT has recorded more hours than our historical average in preparing this compensation request. This amount of time is reasonable in order to provide the information that the Commission is now indicating that it expects.</p> <p>CforAT also notes that our prior compensation request only included time spent on drafting that request and did not include time preparing the NOI and Amended NOI. Those hours are included here.</p>	

	CPUC Discussion
<p>c. Allocation of hours by issue:</p> <p style="text-align: center;">Kasnitz Time - 2020 (9.4 hours)</p> <p>General Participation: 8.0 hours (85%)</p> <p>The issue area “General Participation” includes time spent on procedural matters, including all time prior to the initial Prehearing Conference held in the proceeding. As the proceeding advanced, it also included appropriate review of activity where CforAT was not an active party to ensure that we remained aware of active matters and potential areas of importance to our constituency. This includes limited amount of time monitoring PG&E’s zonal electrification application, A.22-08-003, which has ongoing relevance for long-term gas planning. As discussed above, these activities may not be memorialized specifically in a final decision, but they are necessary for counsel to engage in as a matter of professional responsibility and to ensure compliance with Rule 1.1.</p> <p>Track 1/Monitoring: 1.4 hours (15%)</p> <p>As discussed above, the issue area “Track 1/Monitoring” includes time spent monitoring activity in Track 1 or Phase 1 of the proceeding to ensure that the interests of our constituency were not subject to negative impacts and that no issues requiring our input were raised.</p> <p style="text-align: center;">Kasnitz Time – 2021 (11.2 hours)</p> <p>General Participation: 0.3 hours (< 3%)</p> <p>Track 1 Monitoring: 1.9 hours (17%)</p> <p>Track 2: 9.0 hours (80%)</p> <p>The issue area “Track 2” includes time spent on all issues addressed within Track 2 (or Phase 2) of the proceeding, with the exception of time spent on the development of GO 177, which was the subject of a previous compensation request from CforAT. As discussed above, within Track 2, CforAT primarily focused on issues of affordability and equity.</p> <p style="text-align: center;">Goodman Time – 2021 (1.7 hours)</p> <p>Track 2: 1.7 hours (100%)</p>	Noted

	CPUC Discussion
<p>Kasnitz Time – 2022 (44.5 hours)</p> <p>General Participation: 1.8 hours (4%)</p> <p>Track 1 Monitoring: 0.2 hours (< 1%)</p> <p>Track 2: 42.1 hours (95%)</p> <p>Staff Proposal: 0.4 hours (< 1%)</p> <p>The issue area designated as “Staff Proposal” includes time spent addressing Staff Proposal on Decommissioning, issued in December of 2022. As discussed above, CforAT’s participation in response to the Staff Proposal made procedural contributions that support an award of compensation. However, if the Commission disagrees, CforAT requests a determination that work on the Staff Proposal be authorized to be considered for compensation in the successor proceeding, R.24-09-012.</p> <p>Goodman Time – 2022 (11.7 hours)</p> <p>Track 2: 11.7 hours (100%)</p> <p>Kasnitz Time – 2023 (30.4 hours)</p> <p>General Participation: 5.5 hours (18%)</p> <p>Track 2: 2.1 hours (7%)</p> <p>Staff Proposal: 15.2 hours (50%)</p> <p>GO 177/PFM: 7.6 hours (25%)</p> <p>The issue area “GO 177/PFM” includes time spent reviewing utility reports, participating in the workshop addressing the gas utilities’ first annual report issued under GO 177, the Petition for Modification, and comments on the PD addressing the Petition for Modification and closing the proceeding.</p> <p>Kasnitz Time – 2024 (21.9 hours)</p> <p>General Participation: 0.9 hours (4%)</p> <p>GO 177/PFM: 21.0 hours (96%)</p>	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Melissa W. Kasnitz	2020	9.4	\$495	D.22-07-023	\$4,653.00	1.12 [1,2]	\$495	\$554.40
Melissa W. Kasnitz	2021	11.2	\$670	D.22-07-018	\$7,504.00	2.56 [1,2]	\$670	\$1,715.20
Melissa W. Kasnitz	2022	44.5	\$690	D.23-03-030	\$30,705.00	17.98 [1,2]	\$690	\$12,406.20
Melissa W. Kasnitz	2023	30.4	\$715	D.24-06-018	\$21,736.00	6.18 [1,2]	\$715	\$4,418.70
Melissa W. Kasnitz	2024	21.9	\$735	D.24-10-028	\$16,096.50	6.48 [1,2]	\$735	\$4,762.80
Paul Goodman	2021	1.7	\$530	D,23-06-050	\$1,139.00 ⁴	0 [1]	\$530	\$0.00
Paul Goodman	2022	11.7	\$550	D.23-03-030	\$6,435.00	7.90 [1,2]	\$550	\$4,345.00
Subtotal: \$88,268.50 ⁵						Subtotal: \$28,202.30		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Melissa W. Kasnitz	2020	1.7	\$247.50	½ standard rate	\$371.25 ⁶	1.7	\$247.50	\$420.75
Melissa W. Kasnitz	2021	1.3	\$335	½ standard rate	\$435.50	1.3	\$335	\$435.50
Melissa W. Kasnitz	2024	17.6	\$367.50	½ standard rate	\$6,468.00	15.84 [3]	\$367.50	\$5,821.20
Subtotal: \$7,274.75 ⁷						Subtotal: \$6,677.45		
TOTAL REQUEST: \$95,543.25 ⁸						TOTAL AWARD: \$34,879.75		

⁴ Arithmetic error: 1.7 hours x \$530 = \$901.00.

⁵ Correct subtotal after accounting for error with Mr. Goodman's total 2021 claim is \$88,030.50.

⁶ Arithmetic error. 1.7 hours x \$247.50 = \$420.75

⁷ Correct subtotal is \$7,324.25 (\$420.75+\$435.50+\$6,468.00).

⁸ Correct total request after addressing errors in Mr. Goodman's 2021 total and Ms. Kasnitz 2020 IComp total is \$95,354.75.

CLAIMED		CPUC AWARD	
<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 ⁹	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Melissa W. Kasnitz	1992	162679	No
Paul Goodman	2022	219086	No

C. Attachments Documenting Specific Claim and Comments on Part III:¹⁰

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Time Records, including time on merits and time on compensation

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Disallowances	<p>CforAT does not meet substantial contribution standards of Section 1802(j) or Section 1802.5 regarding all of its activities related to "Track 1 Monitoring" and "Staff Proposal" and parts of its activities related to "General Participation", "Track 2", and "GO 177/PFM" as CforAT's arguments regarding these issues were deemed to not have a considerable impact on the proceeding.</p> <p>Monitoring an issue does not substantially contribute to the Commission's decision-making process and is not verifiable, so therefore, it is not compensable. As noted in Part II above, the claim for Background/Phase 1 does not comply with Rule 17.4(a), Section 1802(j), and Section 1802.5. Therefore, all hours marked as "Track 1 Monitoring" in CforAT's timesheets for 2020, 2021, and 2022 are disallowed.</p>

⁹ This information may be obtained through the State Bar of California's website at: <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

¹⁰ Attachments not included in the final decision.

Item	Reason
	<ul style="list-style-type: none"> • Kasnitz 2020: 1.4 • Kasnitz 2021: 1.9 • Kasnitz 2022: 0.2 <p>As noted in Part II above, the issue of the staff proposal on decommissioning was not resolved in D.23-12-003 or D.24-09-034, so it is not compensable at this time. The claim on the issue of the staff proposal on decommissioning is denied without prejudice and can be reconsidered in Rulemaking 24-09-012 if the claim contributions adds to the resolution of the issue.</p> <p>Therefore, we reduce the hours marked as “Staff Proposal” in CforAT’s timesheets for 2022 and 2023.</p> <ul style="list-style-type: none"> • Kasnitz 2022: 0.4 • Kasnitz 2023: 15.2 <p>The below hours marked “General Participation” consisted of reviewing notices, instructions, agendas, documents not relevant to the claimed issues (i.e. “PG&E Definition of Transmission motion,” and “interim report re: tactical decommissioning”), and party comments. CforAT did not demonstrate how this led to a substantial contribution in the decision-making process; therefore these hours are disallowed.</p> <ul style="list-style-type: none"> • Kasnitz 2020: 2.4 • Kasnitz 2021: 0.3 • Kasnitz 2022: 1.6 • Kasnitz 2023: 5.3 • Kasnitz 2024: 0.3 <p>The below hours marked “Track 2” consisted of reviewing schedules, agendas, party comments, and party reply comments. CforAT did not demonstrate how this led to a substantial contribution in the decision-making process; therefore these hours are disallowed.</p> <ul style="list-style-type: none"> • Kasnitz 2021: 2 • Kasnitz 2022: 8 • Kasnitz 2023: 1 • Goodman 2021: 1.7 • Goodman 2022: 1 <p>The below hours marked “GO 177/PFM” consisted of reviewing notices, agendas, party replies, and phone calls with other intervenors. It also</p>

Item	Reason
	<p>consisted of GO 177 work that was not relevant to the record supporting the PFM because it occurred after the PFM was filed on February 9, 2024 and the record was submitted on March 21, 2024. These hours did not lead to a substantial contribution in the decision-making process and are therefore disallowed.</p> <ul style="list-style-type: none"> • Kasnitz 2023: 0.8 • Kasnitz 2024: 5.3 <p>With the disallowances noted here, the following are the new hourly totals:</p> <ul style="list-style-type: none"> • Kasnitz 2020: 5.6 • Kasnitz 2021: 7 • Kasnitz 2022: 34.3 • Kasnitz 2023: 8.1 • Kasnitz 2024: 16.3 • Goodman 2021: 0 • Goodman 2022: 10.7
[2] Lack of Substantial Contribution	<p>CforAT often repeated other parties' proposals and remarks or did not perform its own unique analysis. The Commission compensates efficient effort that contributes to the proceeding's outcomes; however, the Commission also disallows inefficient participation that is not contributory to the underlying issues. Given the volume of timesheet entries and the limited nature of CforAT's contribution, we apply percentile deductions to CforAT's hours to adjust their compensation to reflect their limited contributions to D.23-12-003 and D.24-09-034. We remind CforAT, per the Intervenor Compensation Program Guide at p.21, the Commission compensates "productive, effective and efficient" efforts that contribute to the proceeding's outcomes.</p> <p>The Commission notes that CforAT's inputs did not result in a substantial contribution to the final decision because they duplicated the positions taken by other parties in the proceeding without providing meaningful input to the positions advocated by other parties; or otherwise addressed issues that were not considered in the final decision.</p> <p>As noted in Part II above, CforAT's contribution to D.23-12-003 was limited and not unique. CforAT submitted comments on 11/2/2021, 6/15/2022, and 6/27/2022. The Amended Scoping Ruling did not adopt CforAT's suggestions in the 11/2/2021 comments, and the citation to the Amended Scoping Ruling provided by CforAT in their claim points to a position held by virtually all parties. While the Phase 2 Decision does acknowledge CforAT's position on</p>

Item	Reason
	<p>the need for reliability on pg. 18, CforAT's citations to p.42, FOFs 9-10, and p.45, COLs 4-5 points to a position held by multiple parties. D.23-12-003 cites parts b, c, and g, of which CforAT only addresses part b, which is a minor portion of their 6/15/2022 submission. In their 6/27 reply comments, CforAT mainly reiterates other parties' positions. Therefore, for lack of substantial contribution to this decision, we apply a 60% reduction related to drafting these documents:</p> <ul style="list-style-type: none"> • Kasnitz 2021: 5.8 hours • Kasnitz 2022: 20.4 hours <p>Given that CforAT's inputs had a limited contribution to the decisions, most of their timesheet entries marked "Track 2" including reviewing documents in this proceeding, reviewing other parties' comments, reviewing documents from workshops, and discussing with other intervenors are deemed excessive, inefficient efforts. We apply a reduction of 80% to the following hours, which are less attributable to a decision than drafting comments:</p> <ul style="list-style-type: none"> • Kasnitz 2021: 1.2 hours • Kasnitz 2022: 4.9 hours • Kasnitz 2023: 1.1 hours • Goodman 2022: 1.7 hours <p>As noted in Part II above, CforAT's contribution to D.24-09-034 on the GO 177/PFM issue was limited and not unique. In their comments submitted on 3/11/24 and 9/12/24, CforAT primarily reiterated what the petitioners argued without providing substantial evidence. We apply a 60% reduction to the hours related to drafting these documents:</p> <ul style="list-style-type: none"> • Kasnitz: 3/5 - 9/11/2024: 14.5 hours <p>Given that CforAT's comments were not substantial, their timesheet entries marked "GO 177/PFM," including reviewing documents in this proceeding, reviewing other parties' comments, and discussing with other intervenors are deemed excessive, inefficient efforts. We apply a reduction of 80% to the following hours, which are less attributable to a decision than drafting comments:</p> <ul style="list-style-type: none"> • Kasnitz 2023: 1.1 • Kasnitz 2024: 0.8 <p>As noted in Part II above, CforAT's contribution to both decisions were limited and not unique. The following hours marked as "General</p>

Item	Reason
	<p>Participation” are deemed unproductive and excessive as they did not lead to a substantial contribution. We apply a reduction of 80% to the following hours, which are less attributable to a decision than drafting comments:</p> <ul style="list-style-type: none"> • Kasnitz 2020: 5.6 • Kasnitz 2022: 0.2 • Kasnitz 2023: 0.2 • Kasnitz 2024: 0.6 <p>With the disallowances noted here and above in item [1], the following are the new hourly totals:</p> <ul style="list-style-type: none"> • Kasnitz 2020: 1.12 • Kasnitz 2021: 2.56 • Kasnitz 2022: 17.98 • Kasnitz 2023: 6.18 • Kasnitz 2024: 6.48 • Goodman 2021: 0 • Goodman 2022: 7.90
Intervenor Compensation	<p>CforAT requests 20.6 hours for the preparation of the intervenor compensation claim. CforAT claims that these hours are higher than they have requested historically because the Commission has recently requested higher specificity, which has required more time of them. However, in the past year, CforAT has had at least two IComp decisions of similar claim sizes to this one¹¹ that represent more efficient efforts. Additionally, we note that the explanations of claimed contribution were inefficient, and the timesheets consisted of over 170 entries which were excessive and largely unsubstantial, and do not justify CforAT’s time-consuming efforts. To reflect our findings, we reduce the requested hours of 17.6 hours from Kasnitz 2024 for drafting the compensation request by 10%. With this disallowance, Kasnitz 2024 IComp hours now total 15.84.</p>

¹¹ D.24-03-025 in the amount of \$104,181.15 awarded in 3/14/2024; CforAT claimed 12.2 hours for IComp claim preparation. D.24-03-064 in the amount of \$107,163.50 awarded in 10/22/2024; CforAT claimed 17 hours for IComp claim preparation, though it should be noted that the formal record supporting the claim was more voluminous.

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
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B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	No
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If not:

Party	Comment	CPUC Discussion

FINDINGS OF FACT

- Center for Accessible Technology has made a substantial contribution to D.23-12-003 and D.24-09-034.
- The requested hourly rates for Center for Accessible Technology's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
- The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
- The total of reasonable compensation is \$34,879.75.

CONCLUSION OF LAW

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

ORDER

- Center for Accessible Technology is awarded \$34,879.75.
- Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Gas Company, and Southwest Gas Corporation shall pay Center for Accessible Technology 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 is 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 5, 2025, the 75th day after the filing of Center for Accessible Technology's request, and continuing until full payment is made.

3. The comment period for today's decision is not waived.

This decision is effective today.

Dated _____, at San Francisco, California

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D2312003 and D2409034		
Proceeding(s):	R2001007		
Author:	ALJ Van Dyken and ALJ Purchia		
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Gas Company, and Southwest Gas Corporation		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Center for Accessible Technology	11/22/2024	\$95,543.25 ¹	\$34,879.75	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
Melissa	Kasnitz	Attorney	\$495	2020	\$495
Melissa	Kasnitz	Attorney	\$670	2021	\$670
Melissa	Kasnitz	Attorney	\$690	2022	\$690
Melissa	Kasnitz	Attorney	\$715	2023	\$715
Melissa	Kasnitz	Attorney	\$735	2024	\$735
Paul	Goodman	Attorney	\$530	2021	\$530
Paul	Goodman	Attorney	\$550	2022	\$550

(END OF APPENDIX)

¹ Arithmetic error detailed in Part III B footnotes. Correct total request is \$95,354.75.