FORM A: BLANK *NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION*

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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of San Diego Gas & Electric Company (U 902-E) for Authority to Establish a Ratemaking Mechanism for Energization Projects Pursuant to Senate Bill 410	Application 25-04-015 (Filed April 25, 2025)

NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION AND, IF REQUESTED (and [ ][1] checked), ADMINISTRATIVE LAW JUDGE'S RULING ON [SMALL BUSINESS UTILITY ADVOCATES]'S SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP

Customer or Eligible Local Government Entity (party intending to claim intervenor compensation): Small Business Utility Advocates ("SBUA")		
Assigned Commissioner: Matthew Baker	**Administrative Law Judge:** Andrew Dugowson	
I hereby certify that the information I have set forth in Parts I, II, III and IV of this Notice of Intent is true to my best knowledge, information and belief.		
	Signature:	*/s/ Ariel Strauss*
Date: June 1, 2025	Printed Name:	Ariel Strauss

PART I: PROCEDURAL ISSUES
(To be completed by the party intending to claim intervenor compensation)

A. Status as "customer" (*see* Pub. Util. Code § 1802(b))[2] The party claims "customer" status because the party is (check one):	**Applies (check)**
1. A **Category 1** customer is an actual customer whose self-interest in the proceeding arises primarily from his/her role as a customer of the utility and, at the same time, the customer must represent the broader interests of at least some other customers. See, for example, D.08-07-019 at 5-10).	☐
2. A **Category 2** customer is a representative who has been authorized by actual customers to represent them. Category 2 involves a more formal arrangement	

[1] DO NOT CHECK THIS BOX if a finding of significant financial hardship is not needed (in cases where there is a valid rebuttable presumption of eligibility (Part III(A)(3)) or significant financial hardship showing has been deferred to the intervenor compensation claim).

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

where a customer or a group of customers selects a more skilled person to represent the customer's views in a proceeding. A customer or group of customers may also form or authorize a group to represent them, and the group, in turn, may authorize a representative such as an attorney to represent the group.	☐
3. A **Category 3** customer is a formally organized group authorized, by its articles of incorporation or bylaws to represent the interests of residential customers or small commercial customers receiving bundled electric service from an electrical corporation (§1802(b)(1)(C)). Certain environmental groups that represent residential customers with concerns for the environment may also qualify as Category 3 customers, even if the above requirement is not specifically met in the articles or bylaws. *See* D.98-04-059, footnote at 30.	☒
4. The party's detailed explanation of the selected customer category. The party's explanation of its status as a Category 1 customer. A party seeking status as a Category 1 customer must describe the party's own interest in the proceeding and show how the customer's participation goes beyond just his/her own self-interest and will benefit other customers. Supporting documents must include a copy of the utility's bill. The party's explanation of its status as a Category 2 customer. A party seeking status as a Category 2 customer must identify the residential customer(s) being represented and provide authorization from at least one customer. The party's explanation of its status as a Category 3 customer. If the party represents residential and small commercial customers receiving bundled electric service from an electrical corporation, it must include in the Notice of Intent either the percentage of group members that are residential ratepayers or the percentage of the members who are receiving bundled electric service from an electrical corporation. Supporting documentation for this customer category must include current copies of the articles of incorporation or bylaws. If current copies of the articles and bylaws have already been filed with the Commission, only a specific reference (the proceeding's docket number and the date of filing) to such filings needs to be made. Small Business Utility Advocates ("SBUA") is a California 501(c)(3) corporation that represents the interests of small businesses in California (and nationwide). SBUA's mission and purpose are set forth in its Articles of Incorporation. *"The specific purpose of this corporation"* includes to *"represent, protect, and promote the interests of small businesses"* in their capacity *"as public utility customers of bundled electric, natural gas, water, and telecommunications services."* SBUA Articles of Incorporation, Art. II (b). Current SBUA Articles of Incorporation and Bylaws are on file with the Commission. *See* SBUA Notice of	

Intent to Claim Intervenor Compensation in Application 16-09-003, filed January 6, 2017, amended with bylaws, filed January 23, 2017. These articles and bylaws remain current, and pursuant to Commission Rule 17.1(d), SBUA has not attached another copy of SBUA's Articles with the Notice in this proceeding. Consistent with its governing mission, SBUA seeks members in California that are small commercial customers receiving bundled utility services and represents them as a community to protect their utility and energy-related concerns. SBUA has a few members that are themselves nonprofit organizations that represent small businesses but estimates that 97% or more of its California members are small commercial customers. SBUA's high priorities include promoting and maintaining equitable and fair utility programs and expenditures that benefit small businesses. Small commercial customers will be directly impacted by SDG&E's request to recover substantial new energization costs above amounts authorized in its General Rate Case. SBUA is the only party in this proceeding focusing exclusively on the concerns of small businesses, whose interests diverge from residential ratepayers and large businesses on many issues. SBUA has been granted Category 3 customer status and intervenor compensation for contributions in numerous cases before the California Public Utilities Commission, including in A.22-06-003, R.22-02-005, A.19-07-006, R.19-01-11, A.18-11-005, R.18-07-003, A.18-01-012, A.17-09-006, A.17-06-031, A.17-02-008, A.16-06-013, A.15-09-001, A.13-02-011, and A.12-11-009.	
Do you have any direct economic interest in outcomes of the proceeding? [3] If "Yes", explain:	☐Yes ☒No
B. Conflict of Interest (§ 1802.3)	**Check**

1. Is the customer a representative of a group representing the interests of small commercial customers who receive bundled electric service from an electrical corporation?	☒Yes ☐ No
2. If the answer to the above question is "Yes", does the customer have a conflict arising from prior representation before the Commission?	☐Yes ☒No
C. Status as an Eligible Local Government Entity (§§1802(d), 1802.4, 1803.1)	
The party claims "eligible local government entity" status because the party is a city, county, or city and county that is not a publicly owned public utility that intervenes or participates in a Commission proceeding for the purpose of protecting the health and safety of the residents within the entity's jurisdiction following a catastrophic material	☐Yes ☒No

[3] See Rule 17.1(e).

loss suffered by its residents either in significant damage to infrastructure or loss of life and property, or both, as a direct result of public utility infrastructure.	
The party's explanation of its status as an eligible local government entity must include a description of (1) The relevant triggering catastrophic event; (2) The impacts of the triggering catastrophic event on the residents within the entity's jurisdiction as a result of public utility infrastructure; and (3) The entity's reason(s) to participate in this proceeding.	
D. Timely Filing of Notice of Intent to Claim Intervenor Compensation (NOI) (§ 1804(a)(1)):	
1. Is the party's NOI filed within 30 days after a Prehearing Conference? Date of Prehearing Conference: June 2, 2025	☒Yes ☐No
2. Is the party's NOI filed at another time (for example, because no Prehearing Conference was held, the proceeding will take less than 30 days, the schedule did not reasonably allow parties to identify issues within the timeframe normally permitted, or new issues have emerged)?	☐Yes ☒No
2a. The party's description of the reasons for filing its NOI at this other time:	
2b. The party's information on the proceeding number, date, and decision number for any Commission decision, Commissioner ruling, Administrative Law Judge's ruling, or other document authorizing the filing of NOI at that other time:	

PART II: SCOPE OF ANTICIPATED PARTICIPATION
(To be completed by the party intending to claim intervenor compensation)

A. Planned Participation (§ 1804(a)(2)(A)):
The party's statement of the issues on which it plans to participate: SBUA will focus on issues of significance to small businesses. SBUA plans to participate by providing input to the Commission on: 1. Compliance of SDG&E's annual cost caps with SB 410. 2. Compliance of SDG&E's cost categories with SB 410. 3. Compliance of SDG&E's ratemaking mechanism with SB 410. 4. Other issues that may arise in the proceeding.

SBUA reserves the right to address other issues that arise as the proceeding progresses that may impact small businesses.

The party's explanation of how it plans to avoid duplication of effort with other parties:

SBUA intends to engage with the applicant and the other parties as necessary to avoid duplication.

The party's description of the nature and extent of the party's planned participation in this proceeding (to the extent that it is possible to describe on the date this NOI is filed).

SBUA has attended the prehearing conference, submitted prepared direct testimony and intends to otherwise participate in this proceeding as an intervenor.

B. The party's itemized estimate of the compensation that the party expects to request, based on the anticipated duration of the proceeding (§ 1804(a)(2)(A)):

Item	Hours	Rate $	Total $	#
ATTORNEY, EXPERT, AND ADVOCATE FEES				
Ariel Strauss, Regulatory Counsel	50	$550	$27,500	
James Birkelund, General Counsel	20	$830	$16,600	
Matt Sheriff, Expert	30	$430	$12,900	
Subtotal: $57,000				
OTHER FEES				
Subtotal: $0				
COSTS				
Subtotal: $0				
TOTAL ESTIMATE: $57,000				

Estimated Budget by Issues:

1. Annual cost caps: 40%
2. Cost categories: 25%
3. Ratemaking mechanism: 25%
4. Other issues that may arise in the proceeding: 10%

Estimates of attorney and expert witness time and hourly rates are preliminary and will depend on how the case progresses, including whether evidentiary hearings are held. The reasonableness of the hourly rates for SBUA's representatives will be addressed in our Request for Compensation. SBUA is basing intervenor compensation rates by years of experience (Resolution ALJ-393) and based on Commission awards of intervenor compensation in recent decisions.

When entering items, type over bracketed text; add additional rows to table as necessary. Estimate may (but does not need to) include estimated Claim preparation time. Claim preparation time is typically compensated at ½ professional hourly rate.

PART III: SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP
(To be completed by party intending to claim intervenor compensation; see Instructions for options for providing this information)

A. The party claims that participation or intervention in this proceeding without an award of fees or costs imposes a significant financial hardship, on the following basis:	**Applies (check)**
1. The customer cannot afford, without undue hardship, to pay the costs of effective participation, including advocate's fees, expert witness fees, and other reasonable costs of participation. (§ 1802(h))	☐
2. In the case of a group or organization, the economic interest of the Individual members of the group or organization is small in comparison to the costs of effective participation in the proceeding. (§ 1802(h))	☐
3. The eligible local government entities' participation or intervention without an award of fees or costs imposes a significant financial hardship. (§ 1803.1(b).)	☐
4. A § 1802(h) or § 1803.1(b) finding of significant financial hardship in another proceeding, made within one year prior to the commencement of this proceeding, created a rebuttable presumption in this proceeding (§ 1804(b)(1)). Commission's finding of significant financial hardship made in proceeding number: A.23-10-001 Date of Administrative Law Judge's Ruling (or CPUC Decision) in which the finding of significant financial hardship was made: June 3, 2024	☒

B. The party's explanation of the factual basis for its claim of "significant financial hardship" (§ 1802(h) or § 1803.1(b)) (necessary documentation, if warranted, is attached to the NOI:

PART IV: ATTACHMENTS DOCUMENTING SPECIFIC ASSERTIONS MADE IN THIS NOTICE
(The party intending to claim intervenor compensation identifies and attaches documents; add rows as necessary)

Attachment No.	Description
1	Certificate of Service

ADMINISTRATIVE LAW JUDGE RULING[4]
(Administrative Law Judge completes)

	Check all that apply
1. The Notice of Intent (NOI) is rejected for the following reasons:	☐
a. The NOI has not demonstrated the party's status as a "customer" or an "eligible local government entity" for the following reason(s):	☐
b. The NOI has not demonstrated that the NOI was timely filed (Part I(B)) for the following reason(s):	☐
c. The NOI has not adequately described the scope of anticipated participation (Part II, above) for the following reason(s):	☐
2. The NOI has demonstrated significant financial hardship for the reasons set forth in Part III of the NOI (above).	☐
3. The NOI has not demonstrated significant financial hardship for the following reason(s):	☐
4. The Administrative Law Judge provides the following additional guidance (see § 1804(b)(2)):	☐

IT IS RULED that:

1. The Notice of Intent is rejected.	☐
2. The customer or eligible local government entity has satisfied the eligibility requirements of Pub. Util. Code § 1804(a).	☐
3. The customer or eligible local government entity has shown significant financial hardship.	☐
4. The customer or eligible local government entity is preliminarily determined to be eligible for intervenor compensation in this proceeding. However, a finding of significant financial hardship in no way ensures compensation.	☐

[4] A Ruling needs not be issued unless: (a) the NOI is deficient; (b) the Administrative Law Judge desires to address specific issues raised by the NOI (to point out similar positions, areas of potential duplication in showings, unrealistic expectations for compensation, or other matters that may affect the customer or eligible local government entity's Intervenor Compensation Claim); or (c) the NOI has included a claim of "significant financial hardship" that requires a finding under § 1802(h).

5. Additional guidance is provided to the customer or eligible local government entity as set forth above.	☐

Dated _____, at San Francisco, California.

_____

Administrative Law Judge