

Decision \_\_\_\_\_



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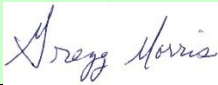
**A2507017**

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

Application of Green Power Institute for award of intervenor compensation for substantial contributions to Resolution Numbers SPD-35, SPD-36.	A.25-07-0xx (Filed July 25, 2025)
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**INTERVENOR COMPENSATION CLAIM OF GREEN POWER INSTITUTE  
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF GREEN  
POWER INSTITUTE**

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

<b>Intervenor: Green Power Institute</b>	<b>For contribution to Resolutions SPD-35, SPD-36</b>
<b>Claimed: \$ 74,290</b>	<b>Awarded: \$</b>
<b>Exec. Director: Rachel Peterson</b>	<b>Assigned ALJ: None Assigned</b>
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>	
<b>Date: July 25, 2025</b>	<b>Printed Name: Gregg Morris</b>

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

<b>A. Brief description of Decision:</b>	<b>SPD-35, Ratifies action of the OEIS on Liberty Utility's 2025 WMP Update</b> <b>SPD-36, Ratifies action of the OEIS on PacifiCorps's 2025 WMP Update</b>
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812<sup>1</sup>:**

	<b>Intervenor</b>	<b>CPUC Verification</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	None	
2. Other specified date for NOI:	None	
3. Date NOI filed:	Concurrent with this Request for Compensation (see Attachment 10).	
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:	R.22-10-010	
6. Date of ALJ ruling:	May 15, 2023	
7. Based on another CPUC determination (specify):		
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:	R.22-10-010 (see note below)	
10. Date of ALJ ruling:	May 15, 2023	
11. Based on another CPUC determination (specify):	D.24-08-054	

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

12. Has the Intervenor demonstrated significant financial hardship?	
<b>Timely request for compensation (§ 1804(c)):</b>	
13. Identify Final Decision:	SPD-36
14. Date of issuance of Final Order or Decision:	June 26, 2025
15. File date of compensation request:	July 25, 2025
16. Was the request for compensation timely?	

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

#	Intervenor's Comment(s)	CPUC Discussion
Line 9	The May 15, 2023, ALJ Ruling on GPI's NOI in R.22-10-010 requested additional financial information before making a finding of "significant financial hardship." On June 22, 2023, GPI submitted the requested additional information in our filed Supplement to the NOI. Decision D.24-08-054 made the final determination that GPI demonstrated significant financial hardship.	

**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
	(Please note that Attachment 2 includes a list of issue areas and GPI Pleadings relevant to this Claim.)	
<b>1. The Liberty Utility 2025 WMP Update.</b>  The GPI made substantial contributions to Resolution	<b>Resolution SPD-35</b>  The Green Power Institute (GPI) submitted comments indicating general support for Energy Safety's decision on	

<p>SPD-35 by performing a detailed analysis of Liberty Utility's 2025 WMP Update and related documents, and providing OEIS and the Commission with the results of our analysis and our recommendations for fixing deficiencies in Liberty Utility's three-year plan, and in preparation for the coming three-year cycle, whose new three-year plan was recently filed. OEIS adopted many of our suggestions in responding to Liberty Utilities, and in drafting their decision on Liberty Utility's 2025 WMP Update, which SPD-35 ratifies. GPI is given credit in OEIS's decision on Liberty Utility's update for several important contributions, including recommending that Liberty strengthen its risk modeling efforts by establishing dates and milestones for modeling improvements, explain and further analyze its efforts to harden its system by various means including traditional hardening methods, installation of covered conductor, and implementation of Sensitive Relay Profiling, improve its grid inspection protocols, and update its resonant grounding pilot. The OEIS decision made several modifications to the text in order to incorporate GPI's recommendations, as noted in the decision and quoted in the righthand column of this claim. Most of our positions were adopted in the final OEIS decision. In</p>	<p>Liberty's 2025 WMP Update and the Commission's intent to ratify the action. [SPD-35, pg. 7.]</p> <p>The following individuals and organizations submitted comments that Energy Safety considered in this Decision: ... The Green Power Institute (GPI) ... [SPD-35, pg. A-12.]</p> <p>Energy Safety concurred with and incorporated the following stakeholder comments into Energy Safety's findings on Liberty's 2025 WMP Update: ... [SPD-35, pg. A-12.]</p> <p>GPI commented that Energy Safety require Liberty to: [SPD-35, pgs. A-12-13.]</p> <ul style="list-style-type: none"> <li>o Establish risk model implementation milestones and dates per the requirements in LU-23-04.</li> <li>o Provide and substantiate its method for assessing mitigation effectiveness of SRP, traditional overhead hardening, and covered conductor.</li> <li>o Assess the risk mitigation effectiveness of risk rank informed detailed inspection frequencies above GO95 standards via aerial or ground inspection methods.</li> <li>o Benchmark with other utilities' infrared and drone inspection programs as well as perform more meaningful pilots.</li> <li>o Provide an update on its resonant grounding pilot.</li> </ul> <p>Energy Safety made the following changes to the draft Decision as a result of comments received from stakeholders: [SPD-35, pg. A-14.]</p> <p>1. GPI commented that Section 6.2.2.1 should incorporate minor revisions to Energy Safety's evaluation of area for continued improvement "LU-23B-02:</p>	
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<p>instances where our positions were not adopted, we made substantial contributions by enriching the record underlying the decision.</p>	<p>PSPS and Wildfire Risk Trade-Off Transparency.”</p> <p>a. Energy Safety modified Section 6.2.2.1 to incorporate GPI’s recommendation for added clarity.</p> <p>2. GPI commented that Appendix D should reference GPI’s contribution provided in its comments on Liberty’s 2025 WMP Update, which recommended that Energy Safety require Liberty to provide an update on its resonant grounding pilot.</p> <p>a. Energy Safety modified Appendix D to include GPI’s comment on Liberty’s resonant grounding pilot.</p> <p>3. GPI commented that Energy Safety should update area for continued improvement “LU-23B-12. Additional Inspection Practices” to require Liberty to justify its pilot projects scopes of work.</p> <p>a. Energy Safety modified LU-23B-12 (LU-25U-06) to include additional required progress, requiring Liberty to provide and explain its pilot scope for each technology.</p> <p><b>Pleadings</b></p> <p>GPI supports this call to continued action and reporting in the 2026-2028 WMP. We are concerned that the expectation may inadvertently get overlooked in the 2026-2028 WMP preparation and review process, which is anticipated to entail a very heavy workload through 2025, in addition to other wildfire and WMP related activities (e.g. RMWG). Memorializing this specific call to action and reporting in an ACI would ensure that Liberty addresses it in the 2026-2028 WMP and that OEIS and stakeholders track and review progress over time. Areas of Continued Improvement identify</p>	
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	<p>expectations for specific improvements to utility WMPs and track the progress of a utility towards fulfilling the expectation. Accordingly, GPI recommends tracking Liberty’s progress “to provide updates regarding [resonant grounding], such as the outcomes of the cost and resource assessments and how it is considering resonant grounding during substation design, in its 2026-2028 Base WMP” via a new ACI. [Comments, 2/18/25, pgs. 2-3.]</p> <p>LU-23B-12 addresses Additional Inspection Practices. The Energy Safety Evaluation finds deficits in Liberty’s response, including a lack of timelines and milestones, as well as issues with the scope of the pilot project and expected find rates.<sup>5</sup> The Draft Decision issues ACI LU-25U-06 to update expectations and track continued progress in this area.<sup>6</sup> GPI generally supports this ACI. We recommend updating LU-25U-06 to also require that Liberty justify (and revise as needed) the pilot projects scope of work, including how the work scopes are right sized to ensure timely and usable outputs that inform downstream program-level implementation and decision making. [Comments, 2/18/25, pg. 3.]</p> <p>GPI is concerned that this delay may be linked in part to a difference between academia-driven timelines versus wildfire mitigation application and compliance driven timelines. Academia is not beholden to Energy Safety expectations or utility wildfire mitigation requirements and liability. Consequently, academia-driven deadlines are not necessarily established, or conformed to, in alignment with utility wildfire mitigation application requirements and expected risk reduction timelines. And,</p>	
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	<p>while the prior delays were explained, the issue is not resolved. Liberty is still waiting for an updated proposal that will solidify if and when UNR HD cameras, and associated policy and procedures, are in place to result in a utility application that supports wildfire risk reduction. The timeline appears to hinge on an academic-driven timeline, such that it is not clear when UNR Principal Investigators, independent of OEIS oversight, will provide an updated proposal and whether their internal timeline considers Liberty's wildfire risk reduction requirements. Given years of delay, which is not resolved and is ongoing, GPI recommends keeping ACI LU-23B-20: Early Detection of Ignitions with HD Cameras open for the purpose of tracking progress on this proposed mitigation through the 2026-2028 WMP cycle. Keeping ACI open for the purpose of continued reporting on unresolved issues is a standard practice and should be applied in the case of LU-23B-20. [Comments, 2/18/25, pg. 4.]</p> <p>Ongoing development and clear agency guidance is critical to establish improved standards for wildfire and reliability risk tolerance thresholds, risk model design, risk model output reporting, model output application, and proposed mitigation portfolio reporting that also unify utility wildfire risk modeling across California. Establishing quantifiable top-down planning standards through state authority, instead of at each utilities discretion, will make strides towards clarifying suitable risk modeling approaches that inform least-cost best-fit wildfire and related reliability risk mitigations across California's HFTD. [Comments, 5/29/25, pg. 1.]</p>	
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<p><b>2. The PacifiCorp 2025 WMP Update.</b></p> <p>The GPI made substantial contributions to Resolution SPD-36 by performing a detailed analysis of PacifiCorp's 2025 WMP Update and related documents, and providing OEIS and the Commission with the results of our analysis and our recommendations for fixing deficiencies in PacifiCorp's three-year plan, and in preparation for the coming three-year cycle, whose new three-year plan was recently filed. OEIS adopted many of our suggestions in responding to PacifiCorp, and in drafting their decision on PacifiCorp's 2025 WMP Update, which SPD-36 ratifies. GPI is given credit in OEIS's decision on PacifiCorp's update for several important contributions, including faulting PacifiCorp for failing to meet OEIS's reporting standards and failure to provide adequate redlines, demanding that PacifiCorp address serious deficiencies in its vegetation management program, improve its determination of where high fire treat are located, and require that PacifiCorp update their calculation of risk scores including PSPS risk analysis and improve their modeling QA/QC protocols. The OEIS decision made several modifications to the text in order to incorporate GPI's recommendations, as noted in the decision and quoted in the</p>	<p><b>Resolution SPD-36</b></p> <p>Comments on the draft Resolution were due by June 12, 2025. The Green Power Institute (GPI) submitted comments indicating general support for Energy Safety's decision on PacifiCorp's 2025 WMP Update and the Commission's intent to ratify the action. [SPD-36, pg. 7.]</p> <p>The following individuals and organizations submitted comments that Energy Safety considered in this Decision: ... The Green Power Institute (GPI) [SPD-36, pg. A-15.]</p> <p>Energy Safety concurred with and incorporated the following stakeholder comments into Energy Safety's findings on PacifiCorp's 2025 WMP Update: ... [SPD-36, pg. A-15.]</p> <p>GPI [SPD-36, pgs. A-15-16.]</p> <ul style="list-style-type: none"> <li>o PacifiCorp's 2025 WMP Update filing package fails to meet reporting standards and must be revised for internal consistency, including corrected tables and figures, and revision numbers.</li> <li>o PacifiCorp must ensure comprehensive redlined changes in revised WMP filings. A resubmittal should be required of both its 2025 WMP and its 2023-2025 WMP filing to include all technical corrections with clear redlining.</li> <li>o PacifiCorp should align its Update and 2023-2025 redlined Base WMP for its transmission intrusive pole inspection targets in Table 8-4.</li> <li>o PacifiCorp must address gaps in its Vegetation Management QA/QC program (VM-11), including extending it to HFRA and must require PacifiCorp</li> </ul>	
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<p>righthand column of this claim. Most of our positions were adopted in the final OEIS decision. In instances where our positions were not adopted, we made substantial contributions by enriching the record underlying the decision.</p>	<p>to include trackable completion date (in place of “deferred”).</p> <ul style="list-style-type: none"> <li>o Update and re-issue PC-23B-02, Calculating Risk Scores Using 95th Percentile Values, to re-scope the required progress for completion and add the requirement to provide the vendor’s plan and timeline.</li> <li>o For PC-23B-03, PSPS and Wildfire Risk Trade-Off Transparency, PacifiCorp should be continued to address delays in its PSPS risk model and provide a plan with milestones.</li> <li>o For PC-23-05, Independent Review Plan Transparency, PacifiCorp should report on its progress for implementing policies and procedures for reviewing internal planning models and expedite its third-party planning risk model review timeline.</li> <li>o For PC-23B-09, QA/QC Pass Rate Targets for Rural Areas, PacifiCorp should align QA/QC pass rates with industry standards and a contract re-negotiation to meet required standards.</li> <li>o For PC-23B-12, Priority A/Level 1 Remediation and Imminent Threat Designation, PacifiCorp must revise its definitions and timelines for Level 1 priority remediation including third-party audit milestones.</li> </ul> <p>Energy Safety made the following changes to the draft Decision as a result of comments received from stakeholders: [SPD-36, pg. A-17.]</p> <ol style="list-style-type: none"> <li>1. GPI commented that PacifiCorp’s wildfire risk model does not align with CPUC approved HFTD update methods and urged revising PC-25U-01, directing PacifiCorp to coordinate with CPUC.</li> </ol> <ol style="list-style-type: none"> <li>a. Energy Safety added language in Section 6.1.2.1, clarifying that the</li> </ol>	
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	<p>CPUC’s process for considering an HFRA is not yet defined. Energy Safety referenced the latest CPUC decision and directed PacifiCorp to outline its plan to begin communicating with the CPUC about its proposed changes to the HFTD. The description of PC-25U-01 was also generalized to show the distinction between the two requirements.</p> <p>2. GPI commented that unresolved asset management issues from area for continued improvement PC-23B-14 should remain tracked to ensure PacifiCorp reports on its 2023 and 2024 inspection QA/QC pass rate.</p> <p>a. Energy Safety revised Section 8.1.3.1 to indicate that the area for continued improvement is modified rather than resolved.</p> <p>b. Energy Safety added an area for continued improvement in Section 11, requiring PacifiCorp to report on its data migration and update of asset information.</p> <p><b>Pleadings</b></p> <p>WMP Decisions must align to CPUC R.15-05-006 Decisions and should consider the nuance of SCE’s 2019 PFM wildfire risk area model approach and its CALFIRE IRT process that led to its approved HFTD update—which predate and diverge from the present WMP wildfire risk planning model approaches applied by utilities today. Consequently, GPI recommends revising PC-25U-01 at this time due to the methodological distinctions in D.20-12-030 and D.25-01-037, the pending status of SCE’s PFM, and the general lack of activity in R.15-05-006. [Comments, 3/17/25, pg. 3.]</p> <p>GPI also recommends that OEIS work directly with the CPUC to gain clarity</p>	
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	<p>on CPUC next steps for an HFTD update process and possible new proceeding. GPI anticipates that coordination between the CPUC and OEIS will clarify next steps as it pertains to updating the HFTD across California, including for all CPUC jurisdictional utilities, and the linkage to the modern day WMP and models therein. [Comments, 3/17/25, pg. 4.]</p> <p>PacifiCorp should be required to report on its 2023 and 2024 inspection pass rate regardless of whether it increases its pass rate target going forward. If PacifiCorp’s actual inspection QA/QC pass rate was below 95 percent (industry standard) in 2023 and 2024 then it should be required to report on the specifics of the inspection failures, investigate the root cause, and provide a solution to improve the pass rate, its inspection process, and/or QA/QC process accordingly. If PacifiCorp achieved a pass rate of 95 percent or above in 2023/2024, then it technically complies with current industry standards, though it is still permissible for PacifiCorp to continue to improve both its inspection and/or QA/QC process. In any case, pass rate transparency that supports WMP review should not be contingent on whether PacifiCorp increases its pass rate “target” in future years. [Comments, 3/17/25, pg. 5.]</p> <p>GPI is concerned that closing an ACI that is deemed not sufficiently addressed reduces the ability to clearly track when the issue is “sufficiently addressed.” This approach also further weakens the clout of ACI in general. If an ACI is not sufficiently addressed, it should remain open or be supplanted with an updated ACI until the issue is adequately resolved, clearly tracking both resolution completion and timing,</p>	
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	<p>regardless of whether reporting also occurs within a WMP and according to the WMP filing guidelines. [Comments, 3/17/25, pg. 6.]</p> <p>PacifiCorp made several significant risk model updates that represent real improvement in their modeling efforts since the beginning of their current three-year WMP (2023-2025). Improvements were made in the areas of implementing a new risk model for determining ignition risk levels, expansion of the modeling time framework from 8 hours to 24 hours, and establishment of a high fire risk zone for power lines that are outside of the state-established HFTD areas, but still represent substantial fire risk. OEIS endorses these modeling developments, and expects further model development in time for the new 2026-2028 WMP, which is due shortly. [Comments, 6/12/25, pg. 1.]</p>	
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**B. 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> TURN, Mussey Grade, PAO, the IOUs, and the SMJUs.		
<b>d. Intervenor's claim of non-duplication:</b> This proceeding covers a wide variety of topics related to the state's programs for wildfire mitigation. The Green Power Institute has been an active participant in the Commission's RPS and LTPP/IRP proceedings and a number of related proceedings, including the		

<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.

<p>now closed wildfire mitigation proceeding, R.18-10-007. The Green Power Institute was the sole party that provided the OEIS with analysis and commentary on the WMPs of the SMJUs. Nevertheless, we coordinated our efforts in this and related proceedings with other parties in order to avoid duplication of effort, including participating in monthly zooms organized by Cal Advocates for parties to coordinate their efforts, and in numerous phone calls with other parties, especially Mussey Grade, TURN, and Cal Advocates, although none of those parties participated directly in the analysis of the 2025 WMP updates of the SMJUs. These bilateral contacts were conducted on an ad hoc basis as various issues came up. We have added significantly to the outcome of the Commission’s deliberations through our own unique perspective. Because we were the only party outside of the SMJUs participating in these proceedings, there was no duplication of effort in the analysis and comments on their WMPs.</p>	
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**C. Additional Comments on Part II: (use line reference # or letter as appropriate)**

#	Intervenor’s Comment	CPUC Discussion

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

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

	CPUC Discussion
<p><b>a. Intervenor’s claim of cost reasonableness:</b></p> <p>The GPI is providing, in Attachment 2, a listing of the pleadings we provided in this Proceeding in the Wildfire Safety Division of the OEIS that is relevant to matters covered by this Claim, and in Attachment 3, a detailed breakdown of GPI staff time spent for work performed that was directly related to our substantial contributions to Resolution nos. SPD-35 and SPD-36.</p> <p>The hours claimed herein in support of Resolution nos. SPD-35 and SPD-36 are reasonable given the scope of the Proceeding, and the strong participation by the GPI. GPI staff maintained detailed contemporaneous time records indicating the number of hours devoted to the matters settled by this Decision in this case. In preparing Attachment 3, Dr. Morris reviewed all of the recorded hours devoted to this proceeding, and included only those that were reasonable and contributory to the underlying tasks. As a result, the GPI submits that all of the hours included in the attachment are reasonable and should be compensated in full.</p> <p>Dr. Morris is a renewable energy analyst and consultant with more than 40 years of diversified experience and accomplishments in the energy and environmental fields. He is a nationally recognized expert on biomass and renewable energy,</p>	

<p>climate change and greenhouse-gas emissions analysis, integrated resources planning, and analysis of the environmental impacts of electric power generation. Dr. Morris holds a BA in Natural Science from the University of Pennsylvania, an MSc in Biochemistry from the University of Toronto, and a PhD in Energy and Resources from the University of California, Berkeley.</p> <p>Dr. Morris has been actively involved in electric utility restructuring in California throughout the past three-and-a-half decades. He served as editor and facilitator for the Renewables Working Group to the California Public Utilities Commission in 1996 during the original restructuring effort, consultant to the CEC Renewables Program Committee, consultant to the Governor’s Office of Planning and Research on renewable energy policy during the energy crisis of 2000-2001, and has provided expert testimony in a variety of regulatory and legislative proceedings, as well as in civil litigation.</p> <p>Dr. Harrold has worked for the Green Power Institute (GPI) for a total of more than 12 years, as a Research Assistant from 2006 to 2008, and again as a Scientist from 2015 to present. Through her work with the GPI she has been engaged with the development of the Renewable Portfolio Standard program (RPS), the Integrated Resources Planning (IRP) proceeding, and the Wildfire Mitigation Plan (WMP) proceeding. Dr. Harrold earned a Ph.D. in geomicrobiology from the University of Washington, Department of Earth and Space Science in 2014.</p> <p>Decision D.98-04-059 states, on pgs. 33-34, “Participation must be productive in the sense that the costs of participation should bear a reasonable relationship to the benefits realized through such participation ... At a minimum, when the benefits are intangible, the customer should present information sufficient to justify a Commission finding that the overall benefits of a customer’s participation will exceed a customer’s costs.” This proceeding is concerned with the development and approval of the wildfire mitigation plans of the wires utilities. The cost reductions and environmental benefits of the WMPs overwhelm the cost of our participation.</p>					
<p><b>b. Reasonableness of hours claimed:</b></p> <p>The GPI made Significant Contributions to Resolution nos. SPD-35 and SPD-36 and their underlying OEIS decisions by actively participating in workshops and working groups, and providing thoughtful and detailed comments to the OEIS on the topics that were under consideration in the Proceeding and are covered by this Claim. Attachment 3 provides a detailed breakdown of the hours that were expended in making our Contributions. The hourly rates and costs claimed are reasonable and consistent with awards to other intervenors with comparable experience and expertise. The Commission should grant GPI’s claim in its entirety.</p>					
<p><b>c. Allocation of hours by issue:</b></p> <table data-bbox="250 1738 963 1808"> <tr> <td>1. Liberty Utility WMP Update</td><td>50%</td></tr> <tr> <td>2. PacifiCorp 2025 WMP Update</td><td>50%</td></tr> </table>	1. Liberty Utility WMP Update	50%	2. PacifiCorp 2025 WMP Update	50%	
1. Liberty Utility WMP Update	50%				
2. PacifiCorp 2025 WMP Update	50%				

**B. Specific Claim:\***

CLAIMED						CPUC AWARD		
<b>ATTORNEY, EXPERT, AND ADVOCATE FEES</b>								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
G. Morris	2024	1.50	505	See comment 1	758			
G. Morris	2025	38.00	520	See comment 1	19,760			
Z. Harrold	2024	61.25	340	See comment 2	20,825			
Z. Harrold	2025	82.25	350	See comment 2	28,788			
<i>Subtotal: \$70,130</i>						<i>Subtotal: \$</i>		
<b>OTHER FEES</b>								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
<i>Subtotal: \$0</i>						<i>Subtotal: \$</i>		
<b>INTERVENOR COMPENSATION CLAIM PREPARATION **</b>								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
G. Morris	2025	16.00	260	½ 2025 rate	4,160			
<i>Subtotal: \$4,160</i>						<i>Subtotal: \$</i>		
<b>COSTS</b>								
#	Item	Detail			Amount	Amount		
<i>Subtotal: \$0</i>						<i>Subtotal: \$</i>		
<b>TOTAL REQUEST: \$74,290</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>								

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

### ATTORNEY INFORMATION

Attorney	Date Admitted to CA BAR <sup>3</sup>	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation

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

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	List of issues with substantial contributions, list of pleadings
Attachment 3	Breakdown of hourly efforts by issue category
Attachment 4	Resolution SPD-35
Attachment 5	Resolution SPD-36
Attachment 6-9	Pleadings to OEIS (see Attachment 2)
Attachment 10	NOI
Comment 1	The Commission has adopted a 4.07 percent for converting 2023 rates to 2024 values, and 3.46 percent for converting 2024 rates to 2025 values. These values can be found on the Escalation tab of the Hourly Rate Chart spreadsheet on the Commission’s web site. We apply the 4.07 percent escalator to the approved 2023 hourly rate for Dr. Morris, which is \$485/hr (D.24-04-036), and round to the nearest 5 percent for 2024 per established Commission practice, to produce a rate of \$505/hr. We apply the 3.46 percent escalator to the 2024 hourly rate and round to the nearest 5 percent for 2025 per established Commission practice, to produce a rate of \$520/hr.
Comment 2	Dr. Harrold’s most recently approved rate is \$250/hr for 2022 (D.24-07-027). D.24-07-027 notes that Dr. Harrold is eligible to move up in 2023 from level 3 to level 4 in the category of Public Policy Analyst. GPI currently has a request for Dr. Harrold’s rate as a level 4 for 2023 on file, pending the first Decision rendered that includes hours for Dr. Harrold for 2023. The request is for \$325/hr. If our request is met in full, that would lead to a 2024 rate of \$340/hr applying the 4.07 percent escalator and rounding to the nearest five, and a 2025 rate of \$350/hr applying the 3.46 percent escalator and rounding to the nearest five.

<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> .

**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>		

If not:

Party	Comment	CPUC Discussion

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

**FINDINGS OF FACT**

1. **Green Power Institute** [has/has not] made a substantial contribution to **SPD-35, SPD-36.**
2. The requested hourly rates for **Green Power Institute**'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. **Green Power Institute** shall be awarded \$\_\_\_\_\_.
2. Within 30 days of the effective date of this decision, \_\_\_\_\_ shall pay **Green Power Institute** the total award. [for multiple utilities: "Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay **Green Power Institute** 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 is 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 **Green Power Institute**'s request, and continuing until full payment is made.
3. The comment period for today's decision [is/is not] waived.
4. This decision is effective today.

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

## APPENDIX

### Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	Resolutions SPD-35 and SPD-36		
Proceeding(s):	A.25-07-0xx		
Author:			
Payer(s):			

### Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Green Power Institute	July 25, 2025	\$74,290		N/A	

### Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Gregg	Morris	Expert	505	2024	
Gregg	Morris	Expert	520	2025	
Zoë	Harrold	Expert	340	2024	
Zoë	Harrold	Expert	350	2025	

**(END OF APPENDIX)**