



Decision _____

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

May 12, 2023

11:57 AM

Application 23-05-010
A2305010
Filed May 12, 2023

Application of Southern California Edison Company (U 338-E) For Authority to Increase Its Authorized Revenues for Electric Service In 2025, Among Other Things, and to Reflect That Increase in Rates.

INTERVENOR COMPENSATION CLAIM OF CENTER FOR ACCESSIBLE TECHNOLOGY AND DECISION ON INTERVENOR COMPENSATION CLAIM OF CENTER FOR ACCESSIBLE TECHNOLOGY

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.

Intervenor: CENTER FOR ACCESSIBLE TECHNOLOGY	For contribution to Decision (D.25-09-030)
Claimed: \$ 15,580.75	Awarded: \$
Assigned Commissioner: Karen Douglas	Assigned ALJ: Colin Rizzo, Ehren Seybert
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).	
Signature:	/s/ Melissa W. Kasnitz
Date: November 24, 2025	Printed Name: Melissa W. Kasnitz

PART I: PROCEDURAL ISSUES

(to be completed by Intervenor except where indicated)

A. Brief description of Decision:	This decision establishes ratepayer funding for SCE for its upcoming General Rate Case cycle and directs SCE on implementation of various programs and requirements. Among the many issues addressed, the decision authorizes and adopts a Joint Proposal between SCE and CforAT that addressing spending to advance accessibility of SCE's facilities and services.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812¹:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	July 12, 2023	
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	August 8, 2023	
4. Was the NOI timely filed?		
Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	R.22-11-013 (DER Issues)	
6. Date of ALJ ruling:	6/14/2023	
7. Based on another CPUC determination (specify):	N/A	
8. Has the Intervenor demonstrated customer status or eligible government entity status?		
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	D.25-09-006	
10. Date of ALJ ruling:	25-09-22	
11. Based on another CPUC determination (specify):	N/A	
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.25-09-030	
14. Date of issuance of Final Order or Decision:	September 25, 2025	
15. File date of compensation request:	November 24, 2025	
16. Was the request for compensation timely?		

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

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

#	Intervenor's Comment(s)	CPUC Discussion

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
1. CforAT's participation in this proceeding was extremely limited, focusing only on development of a new Accessibility Agreement (in the form of a Joint Proposal) for the new SCE GRC cycle and implementation of the Accessibility Joint Proposal that was in place during the prior cycle, including while this docket has been open. This is consistent with work that has been conducted and compensated in previous GRC cycles.	SCE submitted testimony jointly developed with CforAT concerning the Joint Proposal, which addresses SCE's spending over the 2025 GRC cycle for activities supporting and enhancing the accessibility of SCE's facilities, programs, communications, and services for customers with disabilities. Exhibit SCE-09. <i>See also</i> SCE Opening Brief, filed July 15, 2024, at p. 554 (discussing the Joint Proposal). SCE also met regularly with CforAT, consistent with its prior agreement, to discuss ongoing accessibility efforts, which assisted in developing the provisions of the new agreement.	

2. The new Accessibility Joint Proposal was negotiated directly between CforAT and SCE. No party opposed its adoption, and it was adopted by the Commission. D.25-09-030 at pp. 852-853 (authorizing and adopting the Joint Proposal between CforAT and SCE).	Both the current Joint Proposal and the prior Joint Proposal (adopted in D.21-08-036, issued August 20, 2021 in A.19-08-013, SCE's 2021 GRC) include requirements for SCE to provide annual reports to CforAT and any other interested parties regarding SCE's accessibility improvement activities and related spending and to meet with CforAT annually regarding planned accessibility improvement activities for the upcoming year. Exhibit SCE-09 at pp. 2-3; D.21-08-036 at pp. 551-552 (discussing Joint Proposal adopted for SCE's 2021 GRC). The Commission has regularly compensated CforAT for its reasonable participation in these annual meetings. <i>See, e.g.</i>, D.22-08-048, issued August 26, 2022 in A.19-08-013, at pp. 5-9 (awarding compensation for all time spent in annual meetings with SCE and reviewing SCE's annual reports); D.18-08-010, issued August 13, 2018 in A.15-09-001, at pp. 6, 9 (granting compensation to CforAT for its work in PG&E's 2017 GRC, including implementation of accessibility commitments). While the Commission disallowed some hours regarding the annual review as duplicative, it accepted the overall work participating in such activities as appropriate. <i>Id.</i> at p. 6 and p. 9.	
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3. The Accessibility Joint Proposal continues the ongoing commitment by SCE to meet annually with CforAT to discuss its accessibility spending for the past year and prioritize spending plans for the next year. It is appropriate for CforAT to participate in these meetings (which are open to other interested parties) in conjunction with ensuring that SCE meets its accessibility obligations.	While not specifically noted in the Decision, the regular meetings inform negotiations for subsequent agreements and ensure that the funds allocated for accessibility efforts are spent appropriately.	
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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?²	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	No	
c. If so, provide name of other parties: While other parties advocated for the interests of consumers generally, and while no party opposed the positions advocated by CforAT, no other party had a focus on accessibility concerns for customers with disabilities.		
d. Intervenor's claim of non-duplication: As stated above, there were multiple parties representing the interests of consumers in this proceeding, but there were no other parties addressing disability access issues or examining how SCE ensures that its services and communications are accessible. This was the focus of CforAT's participation. Because no other party addressed this issue, there was no duplication of effort.		

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

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
a. Intervenor's claim of cost reasonableness: The only substantive issues addressed by CforAT were those focused on the unique needs of people with disabilities, including ongoing efforts to institutionalize SCE's commitment to effectively serving customers with disabilities via improved physical access to its services and facilities and communication access for disabled customers who cannot access information presented in standard formats. These issues were within the scope of the proceeding and built on agreements reached in prior GRC cycles. The Joint Proposal developed by SCE and CforAT was not contested by any party and was adopted in the final decision. In addition to the work to develop the joint proposal, CforAT monitored the ongoing work by SCE required by the prior Joint Proposal negotiated in the prior GRC and approved by the Commission. CforAT also appropriately monitored the ongoing progress of the overall proceeding overall proceeding. Given the results obtained for CforAT's constituency and the fact that these results were part of an extended GRC proceeding, CforAT's costs were modest and reasonable. Specifically, CforAT's costs total a small fraction of the funding specifically allocated for the benefit of CforAT's constituency in the GRC.	
b. Reasonableness of hours claimed: The total amount of time claimed by CforAT is modest and reasonable given the scope and length of this proceeding. CforAT focused on developing the new Joint Proposal and monitoring work done under the prior Joint Proposal, with limited and appropriate work to monitor the ongoing progress of the overall proceeding.	

	CPUC Discussion
CforAT’s Legal Director, Melissa Kasnitz, has worked regularly with SCE and other IOUs overseeing development and implementation of accessibility commitments. She was appropriately assisted in this work by CforAT’s Policy Analyst, Kate Woodford, who has experience in work with utility reports and commitments, and whose billing rate is substantially lower than that of Ms. Kasnitz. Additionally, much of the work preparing this compensation request was delegated to junior Staff Attorney Rachel Sweetnam, whose billing rate is also substantially lower than that of Ms. Kasnitz. This delegation of work, with appropriate review by Ms. Kasnitz, was efficient and appropriate.	
c. Allocation of hours by issue: Kasnitz Time – 2023 (6.3 hours total) Agreement: 4.3 hours (68%) The issue area designated “Agreement” includes all time spent negotiating the Joint Testimony memorializing the SCE Accessibility Agreement for the new GRC cycle. General Participation: 2.0 hours (32%) The issue area designated “General Participation” includes all time spent monitoring the progress of the overall proceeding, including participation at the PHC and other necessary procedural steps. Woodford Time – 2023 (1.6 hours total) Accessibility: 0.2 hours (12%) The issue area designated “Accessibility includes all work negotiating the Joint Proposal addressing SCE’s commitments to provide accessible service to its customers with disabilities as well as time spent monitoring its implementation of new and existing accessibility commitments. Agreement: 1.4 hours (88%) Kasnitz Time – 2024 (1.7 hours total) Accessibility: 1.7 hours (100%)	

	CPUC Discussion
Woodford Time -2024 (4.7 hours total) Accessibility: 4.7 hours (100%) Kasnitz Time – 2025 (4.7 hours total) Accessibility: 2.1 hours (45%) General Participation: 2.6 hours (55%) Woodford Time – 2025 (6.7 hours) Accessibility: 6.7 hours (100%)	

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	2023	6.3	\$ 715	D.24-06-018	\$ 4,504.50			
Melissa W. Kasnitz	2024	1.7	\$ 735	D.24-10-028	\$ 1,249.50			
Melissa W. Kasnitz	2025	4.7	\$ 755	D.25-10-060	\$ 3,548.50			
Kate Woodford	2023	1.6	\$ 280	D.24-06-020	\$ 448.00			
Kate Woodford	2024	4.7	\$ 290	See below	\$ 1,363.00			
Kate Woodford	2025	6.7	\$ 380	See below	\$ 2,546.00			
Subtotal: \$ 13,659.50						Subtotal: \$		

CLAIMED						CPUC AWARD		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
[Person 1]								
[Person 2]								
<i>Subtotal: \$</i>						<i>Subtotal: \$</i>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Melissa W. Kasnitz	2023	1	\$ 357.50	½ 2023 awarded rate	\$ 357.50			
Melissa W. Kasnitz	2025	1.5	\$ 377.50	½ 2025 awarded rate	\$ 566.25			
Rachel Sweetnam	2025	5.7	\$ 175	½ 2025 rate (awarded in D.25-10-060)	\$ 997.50			
<i>Subtotal: \$ 1,921.25</i>						<i>Subtotal: \$</i>		
COSTS								
#	Item	Detail			Amount	Amount		
1.								
2.								
<i>Subtotal: \$</i>						<i>Subtotal: \$</i>		
TOTAL REQUEST: \$ 15,580.75						TOTAL AWARD: \$		
*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. **Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate								

CLAIMED			CPUC AWARD
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ³	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Melissa W. Kasnitz	1992	162679	No
Rachel Sweetnam	2023	350075	No

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

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	

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))**

A. Opposition: Did any party oppose the Claim?	
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If so:

Party	Reason for Opposition	CPUC Discussion

B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?	
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³ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

If not:

Party	Comment	CPUC Discussion

(Green items to be completed by Intervenor)

FINDINGS OF FACT

1. **CENTER FOR ACCESSIBLE TECHNOLOGY** [has/has not] made a substantial contribution to D.25-09-030.
2. The requested hourly rates for **CENTER FOR ACCESSIBLE TECHNOLOGY**'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. **CENTER FOR ACCESSIBLE TECHNOLOGY** is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay **CENTER FOR ACCESSIBLE TECHNOLOGY** the total award. [for multiple utilities: "Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay **CENTER FOR ACCESSIBLE TECHNOLOGY** their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated. If such data are unavailable, the most recent [industry type, for example, electric] revenue data shall be used."] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75th day after the filing of **CENTER FOR ACCESSIBLE TECHNOLOGY**'s request, and continuing until full payment is made.

Revised March 2023

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

This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D.25-09-030		
Proceeding(s):	A.23-05-010		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
CENTER FOR ACCESSIBLE TECHNOLOGY	November 24, 2025	\$ 15,580.75		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Melissa	Kasnitz	Attorney	\$715	2023	
Melissa	Kasnitz	Attorney	\$735	2024	
Melissa	Kasnitz	Attorney	\$755	2025	
Kate	Woodford	Advocate	\$290	2024	
Kate	Woodford	Advocate	\$380	2025	
Rachel	Sweetnam	Attorney	\$275	2025	

(END OF APPENDIX)