



Decision _____

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

11/21/25

12:18 PM

A2301008

Application of San Diego Gas & Electric Company (U 902 E) for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design.

Application 23-01-008
(Filed January 17, 2023)

INTERVENOR COMPENSATION CLAIM OF UTILITY CONSUMERS' ACTION NETWORK
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF UTILITY CONSUMERS' ACTION NETWORK

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: UTILITY CONSUMERS' ACTION NETWORK		For contribution to Decision (D.) 25-09-006
Claimed: \$107,732.25		Awarded: \$
Assigned Commissioner: Alice Reynolds		Assigned ALJ: Rajan Mutialu
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).		
Signature:		/s/ Jane Krikorian
Date: 11/21/2025	Printed Name:	Jane Krikorian

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

A. Brief description of Decision:	In D.25-09-006, the Commission adopted three settlement agreements including a Marginal Cost Settlement Agreement, a Partial Settlement Agreement, and the Medical Baseline Settlement Agreement. The decision also adopted the system percentage of change methodology to update rates and several other proposals made by parties.
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	All-party settlement discussions began in January of 2024 to find compromises in party positions, avoid litigation, and resolve differences among the parties regarding multiple GRC Ph 2 issues. UCAN actively participated in these discussions that resulted in three Settlements being presented to the Commission in May and June of 2024. While the details of these settlement discussions remain confidential, UCAN will cite to primary documents for our substantial contribution, wherever possible. UCAN was mentioned in the decision for several specific issues which are detailed below.
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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:	May 10, 2023	
2. Other specified date for NOI:		
3. Date NOI filed:	June 9, 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:	A.21-12-006	
6. Date of ALJ ruling:	May 27, 2022	
7. Based on another CPUC determination (specify):		
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:	A.21-12-006	
10. Date of ALJ ruling:	May 27, 2022	
11. Based on another CPUC determination (specify):		

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

	Intervenor	CPUC Verification
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.25-09-006	
14. Date of issuance of Final Order or Decision:	September 22, 2025	
15. File date of compensation request:	November 21, 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

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
<u>1. Marginal Cost Settlement Agreement</u> UCAN joined eight other parties on the Marginal Cost Settlement Agreement. The settlement reflects a compromise of positions held by the parties. UCAN had raised an issue regarding the shared service drop analysis used by SDG&E. The Settlement Agreement referenced UCAN's position.	D. 25-09-006 at 8. Ordering Paragraph (OP) #2 at 93. UCAN-1, Direct Testimony of Mary Neal, filed Jan. 8, 2024, at 2, 10-12. And see UCAN-SDGE-DR-001, Q4, UCAN-SDGE-DR-002, Q1 and Q2, attached to UCAN-1. Joint Motion for Adoption of Marginal Cost Settlement Agreement, filed May 28, 2024, at 11-12 and see fn. 50.	

By signing the MC Settlement Agreement, the MC Settling Parties agreed to resolve all contested marginal cost issues thereby avoiding the need to litigate and resolve the differences among the multiple marginal cost proposals from the parties. UCAN's participation in reaching the settlement agreement and avoiding litigation was a direct benefit to ratepayers by preventing extra litigation expenses.	Also see Attachment B, Comparison Exhibit, B2, attached to Joint Motion.	
<u>2. Partial Settlement Agreement</u> UCAN joined nine other parties on the Partial Settlement Agreement. The settlement reflects a compromise of positions held by the parties. UCAN recommended that SDGE conduct a full evaluation of NEM cost-of-service cross-subsidies in the next GRC Phase 2, noted in the decision. The Partial Settlement Agreement noted two of UCAN's positions. By signing the Partial Settlement Agreement, UCAN agreed all contested NEM issues were resolved. Agreeing on NEM data and studies for	D. 25-09-006 at 7. OP #1 at 92. D. 25-09-006 at 51, and see fn. 132 (referencing UCAN-2 at 8 but should reference UCAN-2 at 3-5 and UCAN-1 at 1-9). And see DR-001 Q5, Q6 attached to UCAN-1, Direct Testimony of Mary Neal, filed Jan. 8, 2024. Joint Motion for Adoption of Partial Settlement Agreement, filed May 28, 2024, at 29, fn. 103, and Attachment B, Comparison Exhibit at B16 attached to Joint Motion.	

the next GRC Ph 2 is important for ratepayers to avoid underpayments and disparate rate impacts. The decision adopted the provisions in the Partial Settlement Agreement in relation to providing NEM data.	D. 25-09-006 at 52. Conclusion of Law #26 at 88. OP #9 at 94.	
<u>3. Medical Baseline Settlement Agreement</u> UCAN joined CforAT and the City of San Diego in opposition to the Medical Baseline Settlement Agreement. The decision noted UCAN and the other opposing parties' positions. After thoroughly examining all of the participating parties' positions, the Commission adopted the Medical Baseline Settlement Agreement finding it reasonable, consistent with the law, and in the public interest. While not adopting the opposing parties' positions on the Medical Baseline Discount, by providing testimony and an opposition motion, UCAN believes the record was made more robust and complete by the opposing parties, enabling the Commission to thoroughly examine this issue in light of the whole record.	Opposition of CforAT, UCAN, City of SD to Motion of SDGE, CalPA and TURN for Adoption of Medical Baseline Settlement Agreement, filed July 3, 2024. D. 25-09-006 at 57, fn. 149 citing to UCAN-2, Rebuttal Testimony of Mary Neal, filed Feb. 7, 2024 at 12-13. <i>Also see</i> D. 25-09-006 at 58, fn's 152-155. D. 25-09-006 at 60. OP #3 at 93.	

<u>4. Whether SAPC Methodology Should be Modified</u> While UCAN was a Settling Party to the Partial Settlement Agreement filed May 28, 2024, numerous issues were not included in the Partial Settlement Agreement and remained contested. The SAPC Methodology was one of the unsettled issues contested by UCAN. The decision devoted multiple pages to discussing UCAN's position and SDG&E's response, referencing UCAN's Direct Testimony and Opening Brief. Based on a review of the record, the final decision agreed with UCAN and adopted its recommended SAPC methodology for SDG&E.	<i>See</i> Joint Motion for Adoption of Partial Settlement Agreement, filed May 28, 2024, at 2. <i>See</i> Opening Brief of UCAN on the Unsettled Issue of the SAPC Methodology, filed August 16, 2024. <i>And see</i> D. 25-09-006 at 61. <i>See</i> D. 25-09-006 at 61-64 <i>and see</i> fn's 159-169. D. 25-09-006 at 64.	

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?	Yes	
c. If so, provide name of other parties: CforAT		
d. Intervenor's claim of non-duplication: The GRC Ph 2 examines numerous complex issues regarding marginal costs, different types of rate design, customer classes, cost recovery, revenue allocation, and treatment of other unique costs. Multiple parties provided testimonies, analyses and recommendations. Naturally, some parties aligned on some issues and diverged on others. In this proceeding, UCAN focused on several unique issues including service drops, NEM data and cost-of-service studies, and the SAPC methodology, which the Commission adopted. Many issues analyzed by Cal Advocates were not examined by UCAN, such as Marginal Energy Costs and the New Customer Only (NCO) method to calculate the MDCC. Additionally, UCAN opposed Cal Advocates and TURN's positions on the Medical Baseline Settlement Agreement. In these ways, UCAN's work did not duplicate Cal Advocates' or TURN's. Additionally, in the settlement process, UCAN worked closely with all parties, providing unique perspectives on certain issues. UCAN coordinated with other parties throughout the proceeding to achieve a reasonable compromised outcome on most of the disputed issues. If the Commission does find any duplication of effort UCAN urges it to be found minor and therefore reasonable.		

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

#	Intervenor's Comment	CPUC Discussion

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.

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: UCAN seeks a total compensation award of \$107,732.25 as the reasonable cost of its participation. This amount includes time for UCAN’s representative, expert, and support staff. UCAN urges the Commission to find these costs reasonable in light of its substantial contribution to the decision detailed in Part II.A above. UCAN’s participation led to meaningful benefits for residential ratepayers. For example, by advocating for the NEM cost-of-service study in Direct Testimony, UCAN was able to keep this issue front-and-center. The Partial Settlement Agreement included compromised terms for NEM that addressed UCAN’s concerns about cross-subsidies created by NEM policy. The adoption of UCAN’s recommended SAPC methodology also addressed UCAN’s concerns about providing rate stability for customers as well as a smooth allocation of revenues for all customer classes. UCAN also participated in settlement negotiations with a good faith effort to settle as many issues as possible thereby reducing the need for litigation to resolve the differences among the parties. In these ways, UCAN believes the benefits gained for ratepayers far exceed the cost of its participation. UCAN urges the Commission to find these costs reasonable.	
b. Reasonableness of hours claimed: UCAN is claiming 109.64 hours for representative Jane Krikorian, 164 for expert Mary Neal, and 29.50 hours for support staff. The majority of these hours are for substantive work examining important cost issues in SDG&E’s GRC Ph 2 Application. UCAN’s recommendations and work in settlement discussions to craft compromises on those recommendations and other issues, reflected concerns for ratepayer savings. These savings were realized in the Settlement Agreements joined by UCAN and in the adoption of UCAN’s recommendation on the SAPC issue, detailed in Part II.A above. The majority of UCAN’s hours were spent on substantive issues including examining SDG&E’s Application and testimonies, writing data requests, preparing opening and rebuttal testimony in response, and filing opening and reply briefs on the unsettled SAPC issue. UCAN also attended the multiple settlement negotiation meetings. The settlement meetings require patience and attention to detail as issues are examined and party positions	

	CPUC Discussion																								
are heard. It was important for both UCAN representative Jane Krikorian and expert Mary Neal to attend these meetings together so that issues could be monitored and procedural deadlines could be met. Due to UCAN’s success with the NEM and SAPC issues, as well as other settled issues which resulted in savings and rate stability for ratepayers, UCAN urges the Commission to find the number of hours claimed by UCAN reasonable. <u>Timesheets and Allocation of hours</u> – for representative Jane Krikorian and expert Mary Neal, an effort was made to break out their time by issues listed in Part II.A – Substantial Contribution. Time was also broken out by Initial Preparation (IP), Identifying Issues (II), Settling Issues (SI), and Preparing and Presenting – a “catch-all” for different proceeding-related tasks. These categories are to help reflect how UCAN spent its time and made its substantial contributions. <u>Additional Comments on Timesheets and hours</u> – UCAN worked diligently to comply with the IComp Program at 25 and avoid vagueness and/or combining tasks. UCAN asks that where there has been an oversight of this directive to find it minimal and therefore reasonable.																									
c. Allocation of hours by issue: <table><tr><td>Identifying Issues</td><td>29.76</td><td>10%</td></tr><tr><td>Initial Preparation</td><td>12.25</td><td>4%</td></tr><tr><td>Medical Baseline Settlement Agreement</td><td>29.68</td><td>10%</td></tr><tr><td>Partial Settlement Agreement - Net Energy Metering</td><td>29.19</td><td>10%</td></tr><tr><td>Preparing & Presenting</td><td>54.15</td><td>18%</td></tr><tr><td>System Average Percent Change (SAPC)</td><td>54.43</td><td>19%</td></tr><tr><td>Settlement Agreement - Shared Service Drops</td><td>13.94</td><td>5%</td></tr><tr><td>Settling Issues</td><td>70.50</td><td>24%</td></tr></table>	Identifying Issues	29.76	10%	Initial Preparation	12.25	4%	Medical Baseline Settlement Agreement	29.68	10%	Partial Settlement Agreement - Net Energy Metering	29.19	10%	Preparing & Presenting	54.15	18%	System Average Percent Change (SAPC)	54.43	19%	Settlement Agreement - Shared Service Drops	13.94	5%	Settling Issues	70.50	24%	
Identifying Issues	29.76	10%																							
Initial Preparation	12.25	4%																							
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Partial Settlement Agreement - Net Energy Metering	29.19	10%																							
Preparing & Presenting	54.15	18%																							
System Average Percent Change (SAPC)	54.43	19%																							
Settlement Agreement - Shared Service Drops	13.94	5%																							
Settling Issues	70.50	24%																							

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Jane Krikorian	2023	20.75	\$375	D.25-05-026	\$7,781.25			
Jane Krikorian	2024	77.15	\$390	D.25-05-026	\$30,088.50			
Jane Krikorian	2025	2.5	\$545	See Comment 1	\$1,363.50			
Mary Neal (Consultant)	2023	36.75	\$350	D.25-02-024	\$12,863.50			
Mary Neal (Consultant)	2024	111.50	\$365	See Comment 2	\$40,698.50			
Mary Neal (Consultant)	2025	15.75	\$380	See Comment 2	\$5,985.00			
Benjamin Kern (Consultant)	2023	21.5	\$220	D.25-05-026	\$4,537.50			
Benjamin Kern (Consultant)	2024	8	\$230	See Comment 3	\$1,840.00			
Subtotal: \$105,347.25						Subtotal: \$		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
[Person 1]								
[Person 2]								
Subtotal: \$						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Jane Krikorian	2023	1.75	\$180	D.25-08-048	\$341025			
Jane Krikorian	2025	7.5	\$272.5	See Comment 1	\$2,043.75			

CLAIMED				CPUC AWARD
<i>Subtotal: \$2,385.00</i>				<i>Subtotal: \$</i>
COSTS				
#	Item	Detail	Amount	Amount
1.				
2.				
<i>Subtotal: \$</i>				<i>Subtotal: \$</i>
<i>TOTAL REQUEST: \$107,732.25</i>				<i>TOTAL AWARD: \$</i>
*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				
ATTORNEY INFORMATION				
Attorney	Date Admitted to CA BAR ³	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation	
Jane Krikorian	January 3, 2025	359865	No	

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

Attachment or Comment #	Description/Comment
Attachments	Certificate of Service Jane Krikorian's Resume Mary Neal Resume MRW Invoices
Comment 1 Rate Request for Jane Krikorian	<u>Request for 2025 Hourly Rate Pursuant to Resolution ALJ-393</u> UCAN Representative: Jane Krikorian Labor Role: Legal – Attorney Level: III (5-10 yrs experience)

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

Attachment or Comment #	Description/Comment
	2025 Hourly Rate Range (estimated): \$379 - \$589 Requested Hourly Rate: \$545 Current Resume: See Attachments UCAN requests a new rate for Ms. Jane Krikorian in the Attorney category based on her recent admittance to the California Bar in January 2025. Ms. Krikorian's previous categorization was set in 2021 per D.21-12-050 as an Expert: Public Policy Analyst, Level III. Due to Ms. Krikorian's legal experience and years practicing before the Commission, UCAN requests Ms. Krikorian be placed in the Attorney category also at Level III. Ms. Krikorian has 17 years of legal experience, with the past 11 years at UCAN steadily increasing her responsibilities and practice experience before the Commission. Prior to joining UCAN and after receiving her Juris Doctorate in 2010, Ms. Krikorian spent several years as a law clerk at the Legal Aid Society of San Diego assisting in the administrative law areas of the Internal Revenue Service (IRS) and Social Security Administration (SSA). While in law school at California Western School of Law, Ms. Krikorian gained extensive legal research experience working as a law clerk for constitutional law professor Michael R. Belknap (2008-2010). In February 2014, Ms. Krikorian was hired at UCAN. Since then, she has increased her responsibilities and practice experience before the Commission. This includes increased involvement in UCAN's overall advocacy strategies and efforts to contain the increasing costs of electricity on behalf of ratepayers. Ms. Krikorian has helped develop UCAN's legal and policy positions in numerous energy-related proceedings including Integrated Resource Planning, Power Charge Indifference Adjustment, Transportation Electrification, and more recently the Rulemaking to Advance Demand Flexibility through Electric Rates and the Rulemaking to Modernize the Electric Grid for a High Distributed Energy Resources Future. Ms. Krikorian has been involved in several General Rate Cases and Cost-of-Capital proceedings. Ms. Krikorian's involvement in proceedings includes working with expert consultants and witnesses to develop and file testimony, preparing for evidentiary hearings and cross-examining witnesses, writing briefs and submitting comments on Commission rulings and proposed decisions. Ms. Krikorian continues to develop her expertise at the Commission with her recent involvement in proceedings on safety, reliability and ratesetting. The Market Rate Study Hourly Rate Chart lists that an Attorney in Level III should have a JD or equivalent degree, 5-10 years of experience, and be licensed to practice law. It also notes that, "Higher experience levels should have experience with areas of law and procedures relevant to CPUC

Attachment or Comment #	Description/Comment
	matters...” Due to Ms. Krikorian’s 11 years at UCAN and relevant experience of practicing in front of the Commission, her JD and recent admittance to the CA State Bar, UCAN requests Ms. Krikorian’s rate be established at \$545 which should be between the Median Range and High Range for 2025. (Current 2025 rates are not yet published on the Commission website so her 2025 rate in the Public Policy Analyst category with COLA’s is estimated at between \$415 and \$435). UCAN believes this is a just and reasonable rate based on the parameters of the Market Rate Study for an Attorney Level III and Ms. Krikorian’s education, higher experience level and recent admittance to the California State Bar. UCAN appreciates the Commission’s consideration of this request for Ms. Krikorian.
Comment 2 Mary Neal (Consultant) COLA Increase Request	UCAN requests a COLA rate increase for Mary Neal for the years 2023, 2024 and 2025. Ms. Neal’s rate for 2022 was established in D.25-02-024 at \$335. UCAN requests Ms. Neal’s rates be increased to \$350 for 2023 based on the 4.46% COLA increase, to \$365 based on the 4.07% COLA increase, and to \$380 for 2025 based on the 3.46% COLA increase. These COLA increase percentages come from the Market Research Study’s excel spreadsheet. The requested rates all fall within the Hourly Rate Chart’s range for a Level V Energy and Resources Expert with a Bachelor’s Degree and 15+ years of experience. Ms. Neal holds a Master’s Degree in Energy and Environmental Analysis from Boston University, and in 2023 had 14 years of experience in energy consulting (equivalent to a Bachelor’s Degree and 18 years of experience) plus an additional three years as an engineer at a natural gas combustion turbine manufacturer prior to becoming a consultant. Ms. Neal has submitted 17 written testimonies in proceedings before the California Public Utilities Commission and a total of 36 in the U.S. and Canada. Ms. Neal’s testimony and expertise helped raise and resolve important issues in each of the proceedings where she filed testimony on behalf of Utility Consumers’ Action Network. For example, in SDG&E’s previous General Rate Case Phase 2 (A.19-03-002) Ms. Neal’s testimony was the first to recommend adoption of the System Average Percentage Change (SAPC) method for rate changes in between GRCs, which was ultimately implemented. Then, in the most recent GRC Phase 2 (A.23-01-008), Ms. Neal submitted testimony outlining how SDG&E should improve its SAPC methodology to maximize the rate stability benefits of the method, which was adopted by the CPUC in the final decision. For SDG&E’s Power Your Drive Extension (A.19-10-012) application Ms. Neal’s testimony and analysis showed how SDG&E failed to justify cost assumptions and the proposed program size and budget; in SDG&E’s Seasonal Differentiation and High User Charge (A.19-09014) proceeding, Ms. Neal brought a

Attachment or Comment #	Description/Comment
	consumer-focused prospective to why the HUC should be eliminated and proposed changes to SDG&E seasonal rate differential proposal that were made part of the settlement. Given the experience and qualifications detailed above, UCAN believes that Ms. Neal qualifies as a Level V Energy and Resources Expert. We note that while D.25-02-024 set Ms. Neal's rate at \$345 for 2023, that decision used the Level IV Energy and Resources Expert range, which did not allow for the full COLA increase from Ms. Neal's 2022 rate. The Hourly Rate Chart calculates changes to the minimum and maximum values of the range by adding COLA increases calculated using the midpoint of the range (meaning that the high end of the Level IV range increased by 3.0% to \$349.53 for 2023 instead of by 4.46% to \$354.45). UCAN believes that full COLA increases in Ms. Neal's rate from \$335 in 2022 to \$350 in 2023, \$365 in 2024 and \$380 in 2025 are justified and consistent with the range of hourly rates for a Level V Energy and Resources Expert.
Comment 3 Benjamin Kern (Consultant) COLA Increase Request	UCAN requests the following rate adjustments for Mr. Kern to incorporate the appropriate COLA increases. D.25-05-026 set a 2023 rate of \$220 for Mr. Kern based on the Market Rate Study Hourly Rate Chart. COLA Increase Request 202: $\\$220 \times 4.07\% = \\228.95 (rounded to the nearest \$5=\$230)

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?		
If so:		
Party	Reason for Opposition	CPUC Discussion

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

Party	Comment	CPUC Discussion

(Green items to be completed by Intervenor)

FINDINGS OF FACT

1. **UTILITY CONSUMERS' ACTION NETWORK** [has/has not] made a substantial contribution to D.25-09-006.
2. The requested hourly rates for **UTILITY CONSUMERS' ACTION NETWORK**'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. **UTILITY CONSUMERS' ACTION NETWORK** is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay **UTILITY CONSUMERS' ACTION NETWORK** the total award. [for multiple utilities: "Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay **UTILITY CONSUMERS' ACTION NETWORK** 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 **UTILITY CONSUMERS' ACTION NETWORK**'s request, and continuing until full payment is made.

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

This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D.25-09-006		
Proceeding(s):	A.23-01-008		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
UTILITY CONSUMERS' ACTION NETWORK	11/21/2025	\$107,732.25		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Jane	Krikorian	Attorney	\$375	2023	
Jane	Krikorian	Attorney	\$390	2024	
Jane	Krikorian	Attorney	\$545	2025	
Mary	Neal	Expert	\$350	2023	
Mary	Neal	Expert	\$365	2024	
Mary	Neal	Expert	\$380	2025	
Benjamin	Kern	Expert	\$220	2023	
Benjamin	Kern	Expert	\$230	2024	

(END OF APPENDIX)

[illegible]

3/26/2024	Emailing SEIA w/ UCAN Settlement options on NEM issues	0.50						0.5			
3/27/2024	Attending all party settlement discussions-marginal costs, SAPC	1.25									1.25
4/15/2024	Attending all party settlement discussions final documents and settlement conference	0.75				0.75					
4/22/2024	Attending Google Meeting w/ expert Mary Neal re: marginal cost/ settlement agreement	0.25				0.25					
4/22/2024	Attending all party discussion; partial settlement agreements and status conference	1.00				1					
4/23/2024	Reading partial settlement agreement for UCAN issues	1.00				1					
4/24/2024	Attending All Party Settlement discussion to review partial settlement	0.50				0.5					
4/25/2024	Attending Status Conference w/ ALJ	1.00				1					
5/1/2024	Attending all party settlement discussion; revision partial settlement agreement. UCAN's NEM issue still outstanding	0.25				0.25					
5/2/2024	Discussion w/ SDG&E, SEIA, and UCAN re: NEM Settlement	0.75						0.75			
5/2/2024	Phone call w/ expert Mary Neal re: NEM settling issues	0.25						0.25			
5/7/2024	Reading motions to adopt partial settlement' marginal cost	1.00				1					
5/8/2024	Attending all party settlement discussion to discuss final settlement documents	0.50				0.5					
5/8/2024	Reading motion to adopt partial settlement	1.00				1					
5/8/2024	Emailing expert Mary Neal re: motion to adopt Settlement Agreement w/ edits to review	0.25				0.25					
5/10/2024	Phone call w/ expert Mary Neal re: SDG&E NEM settlement offer	0.50						0.5			
5/10/2024	Emailing SDG&E re: UCAN NEM Settlement position	0.25						0.25			
5/14/2024	Reading updated NEM settlement proposal from SDG&E	0.25						0.25			
5/15/2024	Phone call w/ expert Mary Neal re: UCAN edits to Marginal Cost Settlement Agreement	0.25					0.25				
5/15/2024	Emailing SDG&E w/ UCAN's position on NEM updated Settlement Proposal	1.25						1.25			
5/17/2024	Reading and reviewing motion to enter exhibits, stipulated facts and uncontested issues	0.25				0.25					
5/22/2024	Attending all party settlement discussion to finalize motions and settlement agreements	0.50				0.5					
5/23/2024	Reading and reviewing three documents for partial settlement agreement. 1. Agreement, 2. exhibits, 3. motion	1.00				1					
5/23/2024	Emailing SDG&E w/ UCAN approval to file all six documents on behalf of UCAN	0.25				0.25					
7/3/2024	Writing additions to CofAT opposition to Medical Baseline settlement	0.75							0.75		
7/31/2024	Reading draft of brief due 8/16/24	0.50								0.5	
7/31/2024	Attending Google Meeting w/ expert Mary Neal to discuss brief	0.25								0.25	
8/6/2024	Call with J. Krikorian re: Briefs and possible extension of time	0.25	0.25								
8/29/2024	Write reply brief on contested issue btwn SDG&E and UCAN regarding how to implement SAPC methodology	1.50								1.5	
8/29/2024	Send draft reply brief to expert Mary Neal for final review and edits	0.25								0.25	
8/30/2024	Finish writing reply brief due today	1.00								1	
8/30/2024	Send draft reply brief to expert Mary Neal with questions	0.25								0.25	
11/21/2024	Read and review ALJ Ruling issued 11/20/24 w/ Energy Division Staff Proposal	0.50				0.5					
11/22/2024	Read email from SDG&E w/ issues and possible response to ALJ	0.25				0.25					
11/22/2024	Write email to parties w/UCAN tentative postions on ALJ Ruling	0.25				0.25					
12/2/2024	Google meet w/MRW (Mary and Mark) to determine possible UCAN postions on SDG&E motion for reconsideration and Comments to ALJ Ruling	0.25				0.25					
12/2/2024	Email to SDG&E w/UCAN tentative position on motion for reconsideration	0.25				0.25					
12/3/2024	Read ALJ Ruling w/ED Staff Proposal to further analyze proposals and determine UCAN positions.	1.00				1					
12/3/2024	Read SDG&E Motion for Reconsideration for final determination of UCAN's positions	0.45	0.45								
12/4/2024	Email to SDG&E to confirm UCAN supports and joins Motion for Reconsideration	0.25	0.25								
12/5/2024	Begin writing Comments on ALJ Ruling from Nov. 19, 2024 w/ED Staff Proposal	0.45	0.45								
12/5/2024	Email to consultant Mary Neal re: comments on ALJ Ruling	0.25	0.25								
12/6/2024	Comments on ALJ Ruling and UCAN's position as Settling Party to MC Settlement Agreement	2.00	2								
8/13/2025	PD on GRC Ph 2 for UCAN issues	1.50	1.5								
8/28/2025	Substantive edits on UCAN PD Comments	1.00	1								
		100.40	7.90	6.00	8.25	40.75	4.75	9.17	9.17	14.42	
Intervenor Compensation											
Date	Issues	Hours									
6/5/2023	Writing NOI	1.50									
6/9/2023	Finalizing NOI	0.25									
11/16/2025	Drafting ICOMP	2.00									
11/17/2025	Drafting ICOMP	3.00									
11/18/2025	Drafting ICOMP	2.50									
11/19/2025	Finalizing ICOMP	3.00									
		9.25									
Hours by Year											
2023	20.75										
2024	77.15										
2025	2.50										
	100.40										
UCAN Expert Mary Neal											
Date	Issue	Hours	PP	IP	II	SI	1	2	3	4	
12/5/2022	SDG&E NEM Workshop	1.00			1.00						
11/15/2023	Begin review of revised testimony	1.00		1.00							
11/16/2023	Continue review of revised testimony	5.25		5.25							
11/17/2023	Call with J. Krikorian re: Issues to pursue	1.00			1.00						
11/17/2023	Draft first set of discovery questions for SDG&E	5.00			5.00						
11/27/2023	Download discovery from other parties	0.25			0.25						
12/1/2023	Call with J. Krikorian re: SDG&E phase 2 issues to pursue	1.00			1.00						
12/1/2023	Review prior testimony in relation to SDG&E Phase 2 GRC	0.50			0.50						
12/4/2023	Review discovery from other parties	0.50			0.50						
12/7/2023	Review SDG&E discovery responses to UCAN	1.50			1.50						
12/11/2023	Begin review of Cal Advocates testimony	0.50			0.50						
12/12/2023	Prepare follow up discovery questions for SDG&E	1.50					0.75	0.75			
12/12/2023	Continue review of Cal Advocates testimony	1.00			1.00						
12/14/2023	Call with J. Krikorian re: Direct testimony progress and response to Cal Advocates testimony	0.50					0.125	0.125	0.125	0.125	
12/15/2023	Draft discovery for Cal Advocates	2.50					2.50				
12/20/2023	Download and review confidential workpapers	1.00					0.25	0.25	0.25	0.25	
12/21/2023	Analyze SAPC methodology in SDG&E rate models	3.00									3.00
12/22/2023	Review discovery set 2 responses	0.25					0.25				
12/26/2023	Begin draft direct testimony	1.50					0.50	0.50			0.50
12/27/2023	Draft testimony on SAPC methodology	4.00									4.00
12/28/2023	Draft testimony on net energy metering issues	4.00								4.00	
1/3/2024	Continue drafting NEM section of direct testimony	6.00								6.00	
1/3/2024	Call with J. Krikorian re: Direct testimony progress	1.00					0.25	0.25	0.25	0.25	
1/4/2024	Complete draft of direct testimony	8.00					2.00	2.00	2.00	2.00	
1/5/2024	Call with J. Krikorian re: Draft direct testimony	1.00					0.25	0.25	0.25	0.25	
1/5/2024	Edit draft direct testimony	5.00					1.25	1.25	1.25	1.25	
1/8/2024	Prepare final edits and attachments to direct testimony	2.50					0.625	0.625	0.625	0.625	
1/9/2024	Prepare workpaper for direct testimony	1.00					0.25	0.25	0.25	0.25	
1/9/2024	Read direct testimony of other parties	1.00			1.00						
1/17/2024	Email to J. Krikorian re: Draft settlement terms	0.50				0.50					
1/19/2024	Call with City of San Diego re: SDG&E settlement	0.50				0.50					
1/22/2024	Call with J. Krikorian re: Settlement support and rebuttal testimony	0.50				0.50					
1/22/2024	Review settlement materials	1.00				1.00					

1/24/2024	All party settlement call	1.25				1.25				
1/30/2024	Call with J. Krikorian re: Rebuttal testimony	1.00						0.333	0.333	0.333
1/30/2024	Begin rebuttal testimony	3.25						1.08	1.08	1.08
1/30/2024	Review testimony of other intervenors	1.00			1.00					
1/31/2024	All party settlement call	0.50				0.50				
2/1/2024	Prepare draft rebuttal testimony	3.50						1.17	1.17	1.17
2/2/2024	Prepare draft rebuttal testimony	2.00						0.67	0.66	0.67
2/6/2024	J. Krikorian re: Rebuttal testimony	0.75						0.25	0.25	0.25
2/6/2024	Edit draft rebuttal testimony	1.50						0.5	0.5	0.5
2/7/2024	Complete final rebuttal testimony review	1.00						0.333	0.333	0.333
2/12/2024	Review SDG&E rebuttal testimony	3.75			3.75					
2/12/2024	All-party settlement call	1.50				1.50				
2/13/2024	Complete review of rebuttal testimony and response for status report	2.00						0.67	0.67	0.66
2/15/2024	Call with J. Krikorian re: SDG&E rebuttal testimony and settlement issues	0.75				0.75				
2/15/2024	Draft request for party report in settlement	0.50				0.50				
2/21/2024	All party settlement call	2.00				2.00				
2/21/2024	Draft response to parties for SDG&E settlement discussions	1.50				1.50				
2/22/2024	Respond to TURN re: SAPC methodology	0.75								0.75
2/22/2024	Review CCA testimony	0.50			0.50					
2/22/2024	Call with J. Krikorian re: Latest settlement discussions	0.75				0.75				
2/26/2024	All party settlement call	1.00				1.00				
2/27/2024	Call with J. Krikorian re: Medical baseline settlement, CPP, SAPC, NEM issues	0.75					0.187	0.187	0.187	0.187
2/28/2024	Call with J. Krikorian re: Settlement progress	0.25						0.25		
2/28/2024	All party settlement conference	1.00				1.00				
3/4/2024	All party settlement call	1.25				1.25				
3/4/2024	Call with J. Krikorian re: Settlement progress	0.25				0.25				
3/6/2024	All party settlement call	1.00				1.00				
3/6/2024	Call with J. Krikorian re: Settlement progress	0.25				0.25				
3/11/2024	All party settlement call	1.00				1.00				
3/15/2024	Research NEM analysis data needs and errors in SDG&E workpapers	5.75						5.75		
3/15/2024	Call with J. Krikorian re: SAPC methods	0.25								0.25
3/15/2024	Call with SDG&E reps and J. Krikorian re: SAPC methodology	0.50								0.50
3/18/2024	All party settlement call	1.25				1.25				
3/18/2024	Call with J. Krikorian to discuss settlement progress	0.50				0.50				
3/20/2024	All party settlement call	1.00				1.00				
3/21/2024	Call with J. Krikorian re: Settlement issues NEM, SAPC, MB	1.00						0.333	0.333	0.333
3/21/2024	Prepare offers for settlement negotiations	0.50				0.50				
3/25/2024	Call with J. Krikorian re: Settlement progress re: SAPC, NEM, Marginal Cost	1.00						0.50		0.50
3/25/2024	All party settlement conference	1.00				1.00				
3/27/2024	All party settlement call	1.25				1.25				
4/1/2024	All party settlement call	0.25				0.25				
4/3/2024	All party settlement conference	1.00				1.00				
4/22/2024	Call with J. Krikorian re: Partial settlement agreement support	0.50				0.50				
4/24/2024	Review settlement agreement language	0.50				0.50				
5/2/2024	Call with J. Krikorian, SDG&E representatives, SEIA representatives re: Settlement proposal NEM	0.50						0.50		
5/2/2024	Call with J. Krikorian re: Follow up to settlement calls re: NEM settlement	0.50						0.50		
5/8/2024	Review settlement motions	0.50				0.50				
5/8/2024	All party settlement call	0.50				0.50				
5/9/2024	Review new settlement documents	2.00				2.00				
5/10/2024	Call with J. Krikorian re: SDG&E settlement offer	0.50						0.50		
5/14/2024	Email to J. Krikorian re: Settlement offer	0.25						0.25		
5/15/2024	Review data requests for exhibits list	0.25	0.25							
5/15/2024	All party settlement call	1.50				1.50				
5/20/2024	Edit marginal cost settlement	0.50				0.50				
5/30/2024	Begin opening brief	5.00								5.00
6/18/2024	Complete draft brief	3.50								3.50
7/1/2024	Review order extending statutory deadline	0.50			0.50					
7/31/2024	Call with J. Krikorian re: Briefs	0.50								0.50
8/6/2024	Call with J. Krikorian re: Briefs and possible extension of time	0.25	0.25							
8/13/2024	Edit draft brief	1.00								1.0
8/14/2024	Continue to edit draft brief	2.00								2.0
8/15/2024	Review UCAN edits to brief	0.75								0.75
8/21/2024	Review SDG&E opening brief and prepare outline of reply brief	1.75								1.75
8/22/2024	Draft reply brief	2.50								2.50
8/23/2024	Edit reply brief	1.50								1.50
8/29/2024	Review new draft of reply brief	1.00								1.00
8/30/2024	Prepare final edit to reply brief	0.50								0.50
11/19/2024	Review new ruling from ALJ on marginal costs	0.50			0.50					
11/20/2024	Further review of ALJ ruling on marginal costs and deadline extension request	0.50			0.50					
11/21/2024	Email J. Krikorian re: ALJ Ruling and extension request	0.75	0.75							
11/26/2024	Email with J. Krikorian re: Potential joint motion in response to Staff marginal cost proposal	0.50			0.50					
12/2/2024	Call with J. Krikorian, MEF re: SDG&E motion for reconsideration of new ALJ Ruling on marginal costs	0.50			0.50					
12/6/2024	Draft comments on Staff marginal cost proposal	0.25	0.25							
7/7/2025	Review PG&E GRC data request responses	1.00	1.00							
7/7/2025	SCE re: GRC phase 2 settlement	1.00	1.00							
8/18/2025	Review proposed decision and outline responsive comments	1.50	1.50							
8/20/2025	Draft comments on PD	3.00	3.00							
8/29/2025	Edit comments on PD	1.00	1.00							
9/2/2025	Review comments on PD by other parties	1.00	1.00							
9/4/2025	Prepare reply comments on PD	5.25	5.25							
9/5/2025	Prepare reply comments on PD	1.50	1.50							
9/16/2025	Review agenda decision for errors or omissions of UCAN's positions	0.50			0.50					
		164.00	16.75	6.25	21.50	29.75	9.19	20.03	20.52	40.02
Hours by Year										
2023	36.75									
2024	111.50									
2025	15.75									
	164.00									
UCAN Expert Benjamin Kern										
Date	Issue	Hours	PP	IP	II	SI	I	2	3	4
12/1/2023	Research on SDG&E GRC phase 2 discovery; create discovery log	5.00	5.00							
12/5/2023	Add SDG&E responses to Cal Advocates Discovery in SDG&E GRC Phase 2 to discovery log	1.00	1.00							
12/6/2023	Continue to add SDG&E responses to Cal Advocates Discovery in SDG&E GRC Phase 2 to discovery log	2.00	2.00							
12/7/2023	Continue to add SDG&E responses to Cal Advocates Discovery in SDG&E GRC Phase 2 to discovery log	1.00	1.00							
12/8/2023	Continue to add SDG&E responses to Cal Advocates Discovery in SDG&E GRC Phase 2 to discovery log	2.00	2.00							
12/11/2023	Add TURN response to SDG&E GRC Phase 2 discovery log	4.00	4.00							
12/12/2023	Add City of San Diego Response to SDG&E GRC Phase 2 Discovery log	1.50	1.50							
12/13/2023	Add new TURN response to SDG&E GRC Phase 2 discovery log	1.00	1.00							

[illegible]

JANE KRIKORIAN

Attorney/Regulatory
Program Manager
jane@ucan.org

Legal professional with experience developing positions on energy and ratemaking policy before the California Public Utilities Commission (CPUC). Advance positions on reasonable, reliable and affordable rates before the CPUC.

Skills & Expertise

- Drafting and filing legal pleadings
- Coordinating experts
- Managing CPUC participation
- Conducting legal and policy research
- Developing strategies
- Advancing policy positions

Professional Experience

Utility Consumers Action Network (UCAN)

2014-present

Regulatory Program Manager

- Legal advocacy on behalf of utility ratepayers before the California Public Utilities Commission (CPUC).
- Coordinate legal staff with CPUC proceedings and strategic direction for UCAN
- Provide representation on all aspects of regulatory litigation for assigned proceedings.
- Coordinate strategy with experts and other intervenors on CPUC proceedings.
- File protests, submit testimony, attend hearings and workshops, write briefs and submit comments on ratepayer protection issues to ensure reasonable, reliable and affordable rates.
- Managed finances and assisted in preparing yearly budgets of approximately \$600,000.

Legal Aid Society of San Diego – Social Security

2013

Law Clerk

- Review and compile medical records to develop and submit claim to Social Security Administration.
- Research and analyze pertinent laws, codes, and statutes of government agencies administering public benefits.

Legal Aid Society of San Diego – Low-Income Tax Clinic

2011-2012

Law Clerk

- Research and analyze statutes and case law to ascertain correct course of action.
- Draft complex tax documents to help resolve issues for clients before IRS.

California Western School of Law, San Diego, CA

2008-2010

Legal Research Assistant

- Conduct legal research for constitutional law professor for published books and papers.

Education

Juris Doctorate, California Western School of Law, San Diego

Bachelor's Degree, Communications, University of California, San Diego

MARY NEAL

PROFESSIONAL EXPERIENCE

Senior Project Manager MRW & Associates, LLC (2018)

Conduct technical analysis of electric and gas utility rate cases and other regulatory filings and serve as expert witness in regulatory proceedings. Perform integrated resource planning on behalf of Community Choice Aggregators and Electric Service Providers in California. Construct and critique models for utility cost allocation, rate design, retail rate forecasts, and benefits of distributed generation facilities. Evaluate energy procurement options and provide analytical and strategic support for business decisions and litigation on electric and gas issues.

Senior Consultant Daymark Energy Advisors, Inc. (2009-2017)

Advised electric and gas industry clients on resource planning, utility rates, and market design issues. Testified before multiple state and Canadian provincial regulatory agencies on issues related to electric market modeling, fuel cost forecasting, cost allocation, rate design, and electric utility capital planning. Prepared and critiqued numerous electric and gas utility allocated cost of service, revenue requirement and rate design models. Led modeling team for Daymark Energy Advisors' AURORAxmp Northeast electric market model.

Engineer Solar Turbines, Inc. (2005-2008)

Designed dry low-emission combustion systems for Mars SoLoNOx gas turbines. Led development of fuel injectors for landfill gas and aftermarket retrofit applications.

EDUCATION

M.A., Energy and Environmental Analysis, Boston University, 2010
B.S. Mechanical Engineering, University of California, Davis, 2005

Prepared Testimony

1. Nova Scotia Utility and Review Board Matter No. 04600
Direct Testimony of Mary Neal on Behalf of the Nova Scotia Small Business Advocate Concerning Nova Scotia Power's 2012 Annual Capital Expenditure Plan. January 13, 2012.
2. Public Service Commission of Wisconsin Docket No. 3270-UR-118
Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board of Wisconsin Concerning Madison Gas & Electric's Application for Authority to Change Electric and Natural Gas Rates. August 27, 2012.
3. Public Service Commission of Wisconsin Docket No. 6690-UR-123
Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board of Wisconsin Concerning Wisconsin Public Service Corporation's Application to Adjust Electric and Natural Gas Rates. August 13, 2014.
4. Nova Scotia Utility and Review Board Matter No. 06514
Direct Testimony of Mary Neal on Behalf of the Nova Scotia Small Business Advocate Concerning Nova Scotia Power's 2015 Annual Capital Expenditure Plan. January 16, 2015.
5. Public Service Commission of Wisconsin Docket No. 05-CE-145/05-CE-147
Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board of Wisconsin Concerning the Joint Application of Wisconsin Electric Power Company, Madison Gas and Electric Company, and WPPI Energy for a Certificate of Authority to Upgrade Various Power Block Equipment at Elm Road Generating Station Units to Facilitate the Use of Sub-Bituminous or Powder River Basin Coals as a Fuel Source/Construct a Site Bulk Material Handling Project at Oak Creek and Elm Road Generating Station. February 24, 2015.
6. Public Service Commission of Wisconsin Docket No. 6690-UR-124
Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board of Wisconsin Concerning Wisconsin Public Service Corporation's Application to Adjust Electric and Natural Gas Rates. September 2, 2015.
7. Nova Scotia Utility and Review Board Matter No. 07176
Direct Testimony of Mary Neal on Behalf of the Nova Scotia Small Business Advocate Concerning Nova Scotia Power's 2016 Annual Capital Expenditure Plan. February 17, 2016.
8. New York Public Service Commission Case No. 16-E-0060
Direct Testimony of the Electric Rate Panel on Behalf of the New York Utility Intervention Unit Concerning the Rates, Charges, Rules and Regulations of Consolidated

Edison Company of New York, Inc. for Electric Service (with Lee Smith and Danielle Panko). May 27, 2016.

9. Vermont Public Service Board
Testimony of Mary Neal on Behalf of Swanton Village Electric Concerning Swanton Village Electric's Proposed Electric Vehicle Charging Station Pilot Program (with assistance from Vermont Public Power Supply Authority). June 2016.
10. CPUC Application 18-07-024
Testimony on Behalf of The City of Long Beach, Energy Resources Department. April 12, 2019.
11. Public Service Commission of Wisconsin Docket No. 5-CE-146
Direct Testimony of Mary Neal on Behalf of Citizens Utility Board. April 26, 2019.
12. Public Service Commission of Wisconsin Docket No. 5-CE-146
Supplemental Direct Testimony of Mary Neal on Behalf of Citizens Utility Board. May 3, 2019.
13. Public Service Commission of Wisconsin Docket No. 5-CE-146
Rebuttal Testimony of Mary Neal on Behalf of Citizens Utility Board. May 28, 2019.
14. Public Service Commission of Wisconsin Docket No. 5-CE-146
Surrebuttal Testimony of Mary Neal on Behalf of Citizens Utility Board. May 28, 2019.
15. Public Service Commission of Wisconsin Docket No. 6690-UR-126
Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board, Clean Wisconsin & Wisconsin Industrial Energy Group. August 23, 2019.
16. Public Service Commission of Wisconsin Docket No. 6690-UR-126
Supplemental Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board, Clean Wisconsin & Wisconsin Industrial Energy Group. August 28, 2019.
17. Public Service Commission of Wisconsin Docket No. 6690-UR-126
Surrebuttal Testimony of Mary Neal on Behalf of the Citizens Utility Board, Clean Wisconsin & Wisconsin Industrial Energy Group. October 4, 2019.
18. CPUC Application 19-03-002
Direct Testimony of Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design. April 6, 2020.
19. CPUC Application 19-03-002
Rebuttal Testimony of Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design. May 4, 2020.

20. CPUC Application 19-10-012
Testimony of Substitute Witness Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application to Extend and Modify the Power Your Drive Pilot Approved by Decision 16-01-045. May 18, 2020.
21. CPUC Application 19-10-012
Rebuttal Testimony of Substitute Witness Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application to Extend and Modify the Power Your Drive Pilot Approved by Decision 16-01-045. June 19, 2020.
22. CPUC Application 19-09-014
Direct Testimony of Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Phase 2 Opening Testimony. August 21, 2020.
23. CPUC Application 19-11-019
Direct Testimony of Mary Neal on Behalf of the Western Manufactured Housing Communities Association in Pacific Gas & Electric's 2020 Electric Cost Allocation and Rate Design Proceeding. November 20, 2020.
24. CPUC Application 20-10-012
Direct Testimony of Mary Neal on Behalf of the Western Manufactured Housing Communities Association in Phase 2 of Southern California Edison's 2021 General Rate Case Application. July 26, 2021.
25. CPUC Application 21-08-010
Direct Testimony of Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application for Approval of its 2022 Electric Sales Forecast. October 1, 2021.
26. CPUC Application 21-08-010
Rebuttal Testimony of Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application for Approval of its 2022 Electric Sales Forecast. October 8, 2021.
27. CPUC Application 21-12-006
Direct Testimony of Mary Neal on Behalf of The Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application for Approval of Real Time Pricing Pilot Rate. December 30, 2022.
28. CPUC Application 21-12-006
Rebuttal Testimony of Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application for Approval of Real Time Pricing Pilot Rate. January 30, 2023.

29. CPUC Application 22-09-015
Testimony of Mary Neal on Behalf of Long Beach Utilities. June 12, 2023.
30. CPUC Application 22-09-015
Rebuttal Testimony of Mary Neal on Behalf of the Western Manufactured Housing Communities Association in Southern California Gas Company (U 904 G) and San Diego Gas & Electric Company (U 902 G) Gas Cost Allocation Proceeding. July 28, 2023.
31. Public Service Commission of Wisconsin Docket No. 4220-CE-185
Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board and Clean Wisconsin. November 29, 2023.
32. Public Service Commission of Wisconsin Docket No. 4220-CE-185
Rebuttal Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board and Clean Wisconsin. December 21, 2023.
33. CPUC Application 23-01-008
Direct Testimony of Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design. January 8, 2024.
34. Public Service Commission of Wisconsin Docket No. 4220-CE-185
Surrebuttal Testimony of Mary Neal on Behalf of Citizens Utility Board and Clean Wisconsin January 16, 2024.
35. CPUC Application 23-01-008
Rebuttal Direct Testimony of Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design. February 7, 2024.
36. CPUC Application 24-03-019
Testimony of Mary Neal on Behalf of the Western Manufactured Housing Communities Association in Phase 2 of Southern California Edison's 2025 General Rate Case Application. January 8, 2025.



Invoice Date:	10/31/23
Total Amount:	\$335.00
Number:	7155
Terms:	Net 30
Project Code:	754.73
Project:	SDG&E 2024 GRC Phase 2

3405 Kenyon Street, Suite 401
San Diego, CA 92110

Description	Amount
Professional Fees	\$335.00
TOTAL:	\$335.00

UCAN pays MRW 50% of each invoice amount within 30 days. UCAN will pay 50% for all hours worked on the proceeding as so authorized and approved by UCAN, up to \$2,500 per month. If MRW's monthly fees exceed \$5,000 in any month, then the difference between 50% of the fees and \$2,500 will be tracked and carried forward. If the sum of 50% of a subsequent month's bill plus the carryover amount exceeds \$2,500, then UCAN will pay \$2,500 and continue to track the balance.

If you have any questions, please do not hesitate to contact David Howarth at bkp@mrwassoc.com or 510-834-1999.

Federal ID# 26-4500748



MRW & Associates, LLC
1736 Franklin Street
Suite 700
Oakland, CA 94612
510-834-1999
www.mrwassoc.com

INVOICE

Invoice Date: 10/31/23
Total Amount: \$335.00
Number: 7155
Terms: Net 30
Project Code: 754.73
Project: SDG&E 2024 GRC Phase 2

754 Utility Consumers' Action Network
3405 Kenyon Street, Suite 401
San Diego, CA 92110

Invoice Details

Source	Date	Code	Description	Hrs / Qnt	Rate	Amount
Professional Fees						
Mary Neal	12/5/22	Regulatory Monitoring - Workshops	SDG&E NEM Workshop	1.00	\$335.00	\$335.00
			Mary Neal	1.00		\$335.00
			Professional Fees	1.00		\$335.00
TOTAL FEES/EXPENSES				--		\$335.00



Invoice Date:	11/30/23
Total Amount:	\$4,375.00
Number:	7177
Terms:	Net 30
Project Code:	754.73
Project:	SDG&E 2024 GRC Phase 2

3405 Kenyon Street, Suite 401
San Diego, CA 92110

Description	Amount
Professional Fees	\$4,375.00
TOTAL:	\$4,375.00

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Federal ID# 26-4500748



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INVOICE

Invoice Date: 11/30/23
Total Amount: \$4,375.00
Number: 7177
Terms: Net 30
Project Code: 754.73
Project: SDG&E 2024 GRC Phase 2

754 Utility Consumers' Action Network
3405 Kenyon Street, Suite 401
San Diego, CA 92110

Invoice Details

Source	Date	Code	Description	Hrs / Qnt	Rate	Amount
Professional Fees						
Mary Neal	11/15/23	Research	Begin review of revised testimony	1.00	\$350.00	\$350.00
Mary Neal	11/16/23	Research	Continue review of revised testimony	5.25	\$350.00	\$1,837.50
Mary Neal	11/17/23	Telephone/Conference Calls	Call with J. Krikorian re: Issues to pursue	1.00	\$350.00	\$350.00
Mary Neal	11/17/23	Document Preparation and Editing	Draft first set of discovery questions for SDG&E	5.00	\$350.00	\$1,750.00
Mary Neal	11/27/23	Research	Download discovery from other parties	0.25	\$350.00	\$87.50
Mary Neal				12.50		\$4,375.00
Professional Fees				12.50		\$4,375.00
TOTAL FEES/EXPENSES				--		\$4,375.00



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INVOICE

Invoice Date: 12/31/23
Total Amount: \$12,867.50
Number: 7204
Terms: Net 30
Project Code: 754.73
Project: SDG&E 2024 GRC Phase 2

Invoice Summary

Description	Amount
Professional Fees	\$12,867.50
	TOTAL: \$12,867.50

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INVOICE

Invoice Date: 12/31/23
Total Amount: \$12,867.50
Number: 7204
Terms: Net 30
Project Code: 754.73
Project: SDG&E 2024 GRC Phase 2

754 Utility Consumers' Action Network
3405 Kenyon Street, Suite 401
San Diego, CA 92110

Invoice Details

Source	Date	Code	Description	Hrs / Qnt	Rate	Amount
Professional Fees						
Benjamin Kern	12/1/23	Research	Research on SDG&E GRC phase 2 discovery; create discovery log	5.00	\$220.00	\$1,100.00
Benjamin Kern	12/5/23	Research	Add SDG&E responses to Cal Advocates Discovery in SDG&E GRC Phase 2 to discovery log	1.00	\$220.00	\$220.00
Benjamin Kern	12/6/23	Research	Continue to add SDG&E responses to Cal Advocates Discovery in SDG&E GRC Phase 2 to discovery log	2.00	\$220.00	\$440.00
Benjamin Kern	12/7/23	Research	Continue to add SDG&E responses to Cal Advocates Discovery in SDG&E GRC Phase 2 to discovery log	1.00	\$220.00	\$220.00
Benjamin Kern	12/8/23	Research	Continue to add SDG&E responses to Cal Advocates Discovery in SDG&E GRC Phase 2 to discovery log	2.00	\$220.00	\$440.00
Benjamin Kern	12/11/23	Research	Add TURN response to SDG&E GRC Phase 2 discovery log	4.00	\$220.00	\$880.00
Benjamin Kern	12/12/23	Research	Add City of San Diego Response to SDG&E GRC Phase 2 Discovery log	1.50	\$220.00	\$330.00
Benjamin Kern	12/13/23	Research	Add new TURN response to SDG&E GRC Phase 2 discovery log	1.00	\$220.00	\$220.00
Benjamin Kern	12/18/23	Research	Research PG&E and SCE GRC proceeding to find decisions on the treatment of NEM customers	3.00	\$220.00	\$660.00
Benjamin Kern	12/19/23	Research	Continue research into PG&E and SCE GRC proceedings to find decisions on the treatment of NEM customers	1.00	\$220.00	\$220.00
Benjamin Kern				21.50		\$4,730.00
Mary Neal	12/1/23	Telephone/Conference Calls	Call with J. Krikorian re: SDG&E phase 2 issues to pursue	1.00	\$350.00	\$350.00
Mary Neal	12/1/23	Research	Review prior testimony in relation to SDG&E Phase 2 GRC	0.50	\$350.00	\$175.00
Mary Neal	12/4/23	Research	Review discovery from other parties	0.50	\$350.00	\$175.00
Mary Neal	12/7/23	Research	Review SDG&E discovery responses to UCAN	1.50	\$350.00	\$525.00
Mary Neal	12/11/23	Research	Begin review of Cal Advocates testimony	0.50	\$350.00	\$175.00
Mary Neal	12/12/23	Research	Continue review of Cal Advocates testimony	1.00	\$350.00	\$350.00



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INVOICE

Invoice Date: 12/31/23
Total Amount: \$12,867.50
Number: 7204
Terms: Net 30
Project Code: 754.73
Project: SDG&E 2024 GRC Phase 2

754 Utility Consumers' Action Network
3405 Kenyon Street, Suite 401
San Diego, CA 92110

Invoice Details

Source	Date	Code	Description	Hrs / Qnt	Rate	Amount
Mary Neal	12/12/23	Document Preparation and Editing	Prepare follow up discovery questions for SDG&E	1.50	\$350.00	\$525.00
Mary Neal	12/14/23	Telephone/Conference Calls	Call with J. Krikorian re: Direct testimony progress and response to Cal Advocates testimony	0.50	\$350.00	\$175.00
Mary Neal	12/15/23	Document Preparation and Editing	Draft discovery for Cal Advocates	2.50	\$350.00	\$875.00
Mary Neal	12/20/23	Research	Download and review confidential workpapers	1.00	\$350.00	\$350.00
Mary Neal	12/21/23	Research	Analyze SAPC methodology in SDG&E rate models	3.00	\$350.00	\$1,050.00
Mary Neal	12/22/23	Research	Review discovery set 2 responses	0.25	\$350.00	\$87.50
Mary Neal	12/26/23	Develop Testimony/Briefs/Protests	Begin draft direct testimony	1.50	\$350.00	\$525.00
Mary Neal	12/27/23	Develop Testimony/Briefs/Protests	Draft testimony on SAPC methodology	4.00	\$350.00	\$1,400.00
Mary Neal	12/28/23	Develop Testimony/Briefs/Protests	Draft testimony on net energy metering issues	4.00	\$350.00	\$1,400.00
Mary Neal				23.25		\$8,137.50
Professional Fees				44.75		\$12,867.50
TOTAL FEES/EXPENSES				--		\$12,867.50



Invoice Date:	1/31/24
Total Amount:	\$13,925.00
Number:	7219
Terms:	Net 30
Project Code:	754.73
Project:	SDG&E 2024 GRC Phase 2

3405 Kenyon Street, Suite 401
San Diego, CA 92110

Description	Amount
Professional Fees	\$13,925.00
TOTAL:	\$13,925.00

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Federal ID# 26-4500748



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INVOICE

Invoice Date: 1/31/24
Total Amount: \$13,925.00
Number: 7219
Terms: Net 30
Project Code: 754.73
Project: SDG&E 2024 GRC Phase 2

754 Utility Consumers' Action Network
3405 Kenyon Street, Suite 401
San Diego, CA 92110

Invoice Details

Source	Date	Code	Description	Hrs / Qnt	Rate	Amount
Professional Fees						
Benjamin Kern	1/24/24	Research	Review and take notes on SDG&E GRC Phase 2 Reply Comments	2.00	\$230.00	\$460.00
Benjamin Kern	1/25/24	Research	Review and take notes on SDG&E GRC Phase 2 Reply Comments	2.00	\$230.00	\$460.00
Benjamin Kern	1/30/24	Research	Read through TURN testimony and take notes on Medical Baseline Issues	1.00	\$230.00	\$230.00
			Benjamin Kern	5.00		\$1,150.00
Mary Neal	1/3/24	Telephone/Conference Calls	Call with J. Krikorian re: Direct testimony progress	1.00	\$365.00	\$365.00
Mary Neal	1/3/24	Develop Testimony/Briefs/Protests	Continue drafting NEM section of direct testimony	6.00	\$365.00	\$2,190.00
Mary Neal	1/4/24	Develop Testimony/Briefs/Protests	Complete draft of direct testimony	8.00	\$365.00	\$2,920.00
Mary Neal	1/5/24	Telephone/Conference Calls	Call with J. Krikorian re: Draft direct testimony	1.00	\$365.00	\$365.00
Mary Neal	1/5/24	Develop Testimony/Briefs/Protests	Edit draft direct testimony	5.00	\$365.00	\$1,825.00
Mary Neal	1/8/24	Develop Testimony/Briefs/Protests	Prepare final edits and attachments to direct testimony	2.50	\$365.00	\$912.50
Mary Neal	1/9/24	Document Preparation and Editing	Prepare workpaper for direct testimony	1.00	\$365.00	\$365.00
Mary Neal	1/9/24	Research	Read direct testimony of other parties	1.00	\$365.00	\$365.00
Mary Neal	1/17/24	E-mail - Review/respond	Email to J. Krikorian re: Draft settlement terms	0.50	\$365.00	\$182.50
Mary Neal	1/19/24	Telephone/Conference Calls	Call with City of San Diego re: SDG&E settlement	0.50	\$365.00	\$182.50
Mary Neal	1/22/24	Telephone/Conference Calls	Call with J. Krikorian re: Settlement support and rebuttal testimony	0.50	\$365.00	\$182.50
Mary Neal	1/22/24	Research	Review settlement materials	1.00	\$365.00	\$365.00
Mary Neal	1/24/24	Telephone/Conference Calls	All party settlement call	1.25	\$365.00	\$456.25



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Invoice Date: 1/31/24
Total Amount: \$13,925.00
Number: 7219
Terms: Net 30
Project Code: 754.73
Project: SDG&E 2024 GRC Phase 2

754 Utility Consumers' Action Network
3405 Kenyon Street, Suite 401
San Diego, CA 92110

Invoice Details

Source	Date	Code	Description	Hrs / Qnt	Rate	Amount
Mary Neal	1/30/24	Telephone/Conference Calls	Call with J. Krikorian re: Rebuttal testimony	1.00	\$365.00	\$365.00
Mary Neal	1/30/24	Research	Review testimony of other intervenors	1.00	\$365.00	\$365.00
Mary Neal	1/30/24	Develop Testimony/Briefs/Protests	Begin rebuttal testimony	3.25	\$365.00	\$1,186.25
Mary Neal	1/31/24	Telephone/Conference Calls	All party settlement call	0.50	\$365.00	\$182.50
Mary Neal				35.00		\$12,775.00
Professional Fees				40.00		\$13,925.00
TOTAL FEES/EXPENSES				--		\$13,925.00



Invoice Date:	2/29/24
Total Amount:	\$10,088.75
Number:	7261
Terms:	Net 30
Project Code:	754.73
Project:	SDG&E 2024 GRC Phase 2

3405 Kenyon Street, Suite 401
San Diego, CA 92110

Federal ID# 26-4500748



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INVOICE

Invoice Date: 2/29/24
Total Amount: \$10,088.75
Number: 7261
Terms: Net 30
Project Code: 754.73
Project: SDG&E 2024 GRC Phase 2

754 Utility Consumers' Action Network
3405 Kenyon Street, Suite 401
San Diego, CA 92110

Invoice Details

Source	Date	Code	Description	Hrs / Qnt	Rate	Amount
Professional Fees						
Benjamin Kern	2/1/24	Research	Fill in summaries from SDG&E GRC Phase 2 reply comments in draft testimony	1.00	\$230.00	\$230.00
Benjamin Kern	2/2/24	Research	Fill in summaries from SDG&E GRC Phase 2 reply comments in draft testimony	2.00	\$230.00	\$460.00
Benjamin Kern				3.00		\$690.00
Mary Neal	2/1/24	Develop Testimony/Briefs/Protests	Prepare draft rebuttal testimony	3.50	\$365.00	\$1,277.50
Mary Neal	2/2/24	Develop Testimony/Briefs/Protests	Prepare draft rebuttal testimony	2.00	\$365.00	\$730.00
Mary Neal	2/6/24	Telephone/Conference Calls	J. Krikorian re: Rebuttal testimony	0.75	\$365.00	\$273.75
Mary Neal	2/6/24	Develop Testimony/Briefs/Protests	Edit draft rebuttal testimony	1.50	\$365.00	\$547.50
Mary Neal	2/7/24	Develop Testimony/Briefs/Protests	Complete final rebuttal testimony review	1.00	\$365.00	\$365.00
Mary Neal	2/12/24	Telephone/Conference Calls	All-party settlement call	1.50	\$365.00	\$547.50
Mary Neal	2/12/24	Research	Review SDG&E rebuttal testimony	3.75	\$365.00	\$1,368.75
Mary Neal	2/13/24	Research	Complete review of rebuttal testimony and response for status report	2.00	\$365.00	\$730.00
Mary Neal	2/15/24	Telephone/Conference Calls	Call with J. Krikorian re: SDG&E rebuttal testimony	0.75	\$365.00	\$273.75
Mary Neal	2/15/24	Document Preparation and Editing	Draft request for party report in settlement	0.50	\$365.00	\$182.50
Mary Neal	2/21/24	Telephone/Conference Calls	All party settlement call	2.00	\$365.00	\$730.00
Mary Neal	2/21/24	Document Preparation and Editing	Draft response to parties for SDG&E settlement discussions	1.50	\$365.00	\$547.50
Mary Neal	2/22/24	Telephone/Conference Calls	Call with J. Krikorian re: Latest settlement discussions	0.75	\$365.00	\$273.75



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Invoice Date: 2/29/24
Total Amount: \$10,088.75
Number: 7261
Terms: Net 30
Project Code: 754.73
Project: SDG&E 2024 GRC Phase 2

754 Utility Consumers' Action Network
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Invoice Details

Source	Date	Code	Description	Hrs / Qnt	Rate	Amount
Mary Neal	2/22/24	E-mail - Review/respond	Respond to TURN re: SAPC methodology	0.75	\$365.00	\$273.75
Mary Neal	2/22/24	Research	Review CCA testimony	0.50	\$365.00	\$182.50
Mary Neal	2/26/24	Telephone/Conference Calls	All party settlement call	1.00	\$365.00	\$365.00
Mary Neal	2/27/24	Telephone/Conference Calls	Call with J. Krikorian re: Medical baseline settlement	0.75	\$365.00	\$273.75
Mary Neal	2/28/24	Telephone/Conference Calls	All party settlement conference	1.00	\$365.00	\$365.00
Mary Neal	2/28/24	Telephone/Conference Calls	Call with J. Krikorian re: Settlement progress	0.25	\$365.00	\$91.25
Mary Neal				25.75		\$9,398.75
Professional Fees				28.75		\$10,088.75
TOTAL FEES/EXPENSES				--		\$10,088.75



Invoice Date:	3/31/24
Total Amount:	\$6,478.75
Number:	7280
Terms:	Net 30
Project Code:	754.73
Project:	SDG&E 2024 GRC Phase 2

3405 Kenyon Street, Suite 401
San Diego, CA 92110

Description	Amount
Professional Fees	\$6,478.75
TOTAL:	\$6,478.75

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Federal ID# 26-4500748



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INVOICE

Invoice Date: 3/31/24
Total Amount: \$6,478.75
Number: 7280
Terms: Net 30
Project Code: 754.73
Project: SDG&E 2024 GRC Phase 2

754 Utility Consumers' Action Network
3405 Kenyon Street, Suite 401
San Diego, CA 92110

Invoice Details

Source	Date	Code	Description	Hrs / Qnt	Rate	Amount
Professional Fees						
Mary Neal	3/4/24	Telephone/Conference Calls	All party settlement call	1.25	\$365.00	\$456.25
Mary Neal	3/4/24	Telephone/Conference Calls	Call with J. Krikorian re: Settlement progress	0.25	\$365.00	\$91.25
Mary Neal	3/6/24	Telephone/Conference Calls	All party settlement call	1.00	\$365.00	\$365.00
Mary Neal	3/6/24	Telephone/Conference Calls	Call with J. Krikorian re: Settlement progress	0.25	\$365.00	\$91.25
Mary Neal	3/11/24	Telephone/Conference Calls	All party settlement call	1.00	\$365.00	\$365.00
Mary Neal	3/15/24	Telephone/Conference Calls	Call with J. Krikorian re: SAPC methods	0.25	\$365.00	\$91.25
Mary Neal	3/15/24	Telephone/Conference Calls	Call with SDG&E reps and J. Krikorian re: SAPC methodology	0.50	\$365.00	\$182.50
Mary Neal	3/15/24	Research	Research NEM analysis data needs and errors in SDG&E workpapers	5.75	\$365.00	\$2,098.75
Mary Neal	3/18/24	Telephone/Conference Calls	All party settlement call	1.25	\$365.00	\$456.25
Mary Neal	3/18/24	Telephone/Conference Calls	Call with J. Krikorian to discuss settlement progress	0.50	\$365.00	\$182.50
Mary Neal	3/20/24	Telephone/Conference Calls	All party settlement call	1.00	\$365.00	\$365.00
Mary Neal	3/21/24	Telephone/Conference Calls	Call with J. Krikorian re: Settlement negotiations	1.00	\$365.00	\$365.00
Mary Neal	3/21/24	Document Preparation and Editing	Prepare offers for settlement negotiations	0.50	\$365.00	\$182.50
Mary Neal	3/25/24	Telephone/Conference Calls	All party settlement conference	1.00	\$365.00	\$365.00
Mary Neal	3/25/24	Telephone/Conference Calls	Call with J. Krikorian re: Settlement progress	1.00	\$365.00	\$365.00
Mary Neal	3/27/24	Telephone/Conference Calls	All party settlement call	1.25	\$365.00	\$456.25
Mary Neal				17.75		\$6,478.75
Professional Fees				17.75		\$6,478.75



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INVOICE

Invoice Date: 3/31/24
Total Amount: \$6,478.75
Number: 7280
Terms: Net 30
Project Code: 754.73
Project: SDG&E 2024 GRC Phase 2

Invoice Details

Source	Date	Code	Description	Hrs / Qnt	Rate	Amount
TOTAL FEES/EXPENSES				--		\$6,478.75



Invoice Date:	4/30/24
Total Amount:	\$821.25
Number:	7299
Terms:	Net 30
Project Code:	754.73
Project:	SDG&E 2024 GRC Phase 2

3405 Kenyon Street, Suite 401
San Diego, CA 92110

Description	Amount
Professional Fees	\$821.25
TOTAL:	\$821.25

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Federal ID# 26-4500748



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INVOICE

Invoice Date: 4/30/24
Total Amount: \$821.25
Number: 7299
Terms: Net 30
Project Code: 754.73
Project: SDG&E 2024 GRC Phase 2

754 Utility Consumers' Action Network
3405 Kenyon Street, Suite 401
San Diego, CA 92110

Invoice Details

Source	Date	Code	Description	Hrs / Qnt	Rate	Amount
Professional Fees						
Mary Neal	4/1/24	Telephone/Conference Calls	All party settlement call	0.25	\$365.00	\$91.25
Mary Neal	4/3/24	Telephone/Conference Calls	All party settlement conference	1.00	\$365.00	\$365.00
Mary Neal	4/22/24	Telephone/Conference Calls	Call with J. Krikorian re: Partial settlement agreement support	0.50	\$365.00	\$182.50
Mary Neal	4/24/24	Document Preparation and Editing	Review settlement agreement language	0.50	\$365.00	\$182.50
Mary Neal				2.25		\$821.25
Professional Fees				2.25		\$821.25
TOTAL FEES/EXPENSES				--		\$821.25



Invoice Date:	7/31/25
Total Amount:	\$760.00
Number:	7577
Terms:	Net 30
Project Code:	754.73
Project:	SDG&E 2024 GRC Phase 2

3405 Kenyon Street, Suite 401
San Diego, CA 92110

Description	Amount
Professional Fees	\$760.00
TOTAL:	\$760.00

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Federal ID# 26-4500748



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INVOICE

Invoice Date: 7/31/25
Total Amount: \$760.00
Number: 7577
Terms: Net 30
Project Code: 754.73
Project: SDG&E 2024 GRC Phase 2

754 Utility Consumers' Action Network
3405 Kenyon Street, Suite 401
San Diego, CA 92110

Invoice Details

Source	Date	Code	Description	Hrs / Qnt	Rate	Amount
Professional Fees						
Mary Neal	7/7/25	Research	Review PG&E GRC data request responses	1.00	\$380.00	\$380.00
Mary Neal	7/7/25	E-mail - Review/respond	SCE re: GRC phase 2 settlement	1.00	\$380.00	\$380.00
Mary Neal				2.00		\$760.00
Professional Fees				2.00		\$760.00
TOTAL FEES/EXPENSES				--		\$760.00



Invoice Date:	8/31/25
Total Amount:	\$2,090.00
Number:	7592
Terms:	Net 30
Project Code:	754.73
Project:	SDG&E 2024 GRC Phase 2

3405 Kenyon Street, Suite 401
San Diego, CA 92110

Description	Amount
Professional Fees	\$2,090.00
TOTAL:	\$2,090.00

UCAN pays MRW 50% of each invoice amount within 30 days. UCAN will pay 50% for all hours worked on the proceeding as so authorized and approved by UCAN, up to \$2,500 per month. If MRW's monthly fees exceed \$5,000 in any month, then the difference between 50% of the fees and \$2,500 will be tracked and carried forward. If the sum of 50% of a subsequent month's bill plus the carryover amount exceeds \$2,500, then UCAN will pay \$2,500 and continue to track the balance.

If you have any questions, please do not hesitate to contact David Howarth at bkp@mrwassoc.com or 510-834-1999.

Federal ID# 26-4500748



MRW & Associates, LLC
1736 Franklin Street
Suite 700
Oakland, CA 94612
510-834-1999
www.mrwassoc.com

INVOICE

Invoice Date: 8/31/25
Total Amount: \$2,090.00
Number: 7592
Terms: Net 30
Project Code: 754.73
Project: SDG&E 2024 GRC Phase 2

754 Utility Consumers' Action Network
3405 Kenyon Street, Suite 401
San Diego, CA 92110

Invoice Details

Source	Date	Code	Description	Hrs / Qnt	Rate	Amount
Professional Fees						
Mary Neal	8/18/25	Research	Review proposed decision and outline responsive comments	1.50	\$380.00	\$570.00
Mary Neal	8/20/25	Document Preparation and Editing	Draft comments on PD	3.00	\$380.00	\$1,140.00
Mary Neal	8/29/25	Document Preparation and Editing	Edit comments on PD	1.00	\$380.00	\$380.00
Mary Neal				5.50		\$2,090.00
Professional Fees				5.50		\$2,090.00
TOTAL FEES/EXPENSES				--		\$2,090.00



Invoice Date:	9/30/25
Total Amount:	\$3,135.00
Number:	7610
Terms:	Net 30
Project Code:	754.73
Project:	SDG&E 2024 GRC Phase 2

3405 Kenyon Street, Suite 401
San Diego, CA 92110

Federal ID# 26-4500748



MRW & Associates, LLC
1736 Franklin Street
Suite 700
Oakland, CA 94612
510-834-1999
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INVOICE

Invoice Date: 9/30/25
Total Amount: \$3,135.00
Number: 7610
Terms: Net 30
Project Code: 754.73
Project: SDG&E 2024 GRC Phase 2

754 Utility Consumers' Action Network
3405 Kenyon Street, Suite 401
San Diego, CA 92110

Invoice Details

Source	Date	Code	Description	Hrs / Qnt	Rate	Amount
Professional Fees						
Mary Neal	9/2/25	Research	Review comments on PD by other parties	1.00	\$380.00	\$380.00
Mary Neal	9/4/25	Document Preparation and Editing	Prepare reply comments on PD	5.25	\$380.00	\$1,995.00
Mary Neal	9/5/25	Document Preparation and Editing	Prepare reply comments on PD	1.50	\$380.00	\$570.00
Mary Neal	9/16/25	Research	Review agenda decision	0.50	\$380.00	\$190.00
				Mary Neal	8.25	\$3,135.00
				Professional Fees	8.25	\$3,135.00
TOTAL FEES/EXPENSES				--		\$3,135.00