



Decision _____

FILED

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

11/21/25

11:25 AM

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)
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**INTERVENOR COMPENSATION CLAIM OF
SMALL BUSINESS UTILITY ADVOCATES
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF
SMALL BUSINESS UTILITY ADVOCATES**

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

Intervenor: Small Business Utility Advocates (SBUA)	For contribution to Decision (D.) 25-09-006
Claimed: \$212,308.88	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/ Jennifer Weberski
Date: November 21, 2025	Printed Name: Jennifer Weberski

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

A. Brief description of Decision:	D.25-09-006 (the Decision) addresses the 2024 General Rate Case Phase 2 proceeding of San Diego Gas & Electric Company (SDG&E). The Decision adopts three settlement agreements between the parties, including the Partial Settlement Agreement, which resolves cost allocation, creation of a Medium Commercial Class, base time-of-use rates, and most of the other contested issues in this proceeding; the Marginal Cost Settlement Agreement that includes proposals to set marginal costs used in cost allocation and rate design; and the Medical Baseline
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	Settlement Agreement that provides for a line-item medical baseline discount. The Decision also adopts the system percentage of change methodology to update rates, resolved a Power Charge Indifference Adjustment (PCIA) rate design and bill presentment issues, adopted a proposal to combine SDG&E's non-residential commodity and distribution tariffs, and approved SDG&E's other uncontested proposals.
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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 2, 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.22-02-005, et al.	
6. Date of ALJ ruling:	August 2, 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:	R.22-02-005, et al.	
10. Date of ALJ ruling:	August 2, 2022	
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		

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

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:	Nov. 20, 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
B.9-11	SBUA also received a ruling on its customer status and showing of significant financial hardship more recently in A.23-10-001 on June 3, 2024.	

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. Overall This GRC Phase 2 proceeding addressed SDG&E's rate design, marginal costs, and revenue allocation, including Time-of-Use (TOU) periods and Electric Vehicle (EV) rates. SBUA actively participated throughout the docket: engaging in discovery, submitting expert testimony on issues affecting small businesses, and participating extensively in the lengthy and ultimately successful settlement negotiations. This work reflects SBUA's broader effort to secure fair and	On May 8, 2024, SDG&E, SBUA, and several other parties filed motions to adopt the Marginal Cost Settlement Agreement and the Partial Settlement Agreement. Decision at 5. After considering these motions, the Commission adopted both agreements as "reasonable in light of the whole record, consistent with law, and in the public interest." <i>Id.</i> at 9–26 (discussion on Marginal Cost Agreement), 27–52 (discussion on Partial Settlement Agreement). As the Decision explains, "[t]he Partial Settlement Agreement (included as Attachment B to this decision) identifies the settlement conditions, states the settlement terms for each settled item,	

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
equitable rate design outcomes for small commercial customers across Phase 2 GRCs. The Commission approved several settlement agreements to resolve the scoped issues, including two agreements to which SBUA is a signatory: (1) the Partial Settlement Agreement, addressing rate design and revenue allocation, and (2) the Marginal Cost Settlement Agreement. In D.25-09-006, the Commission agreed with ALJ Rajan Mutialu that these settlements are reasonable in light of the record and should be adopted. SBUA submits that its participation in negotiation and execution of these settlements - - each of which resolves issues of direct importance to small businesses – substantially contributed to the outcome of the proceeding. The two Settlement Agreements provided a comprehensive resolution of the issues through compromise, avoiding unnecessary litigation. Across all stages of this proceeding, SBUA consistently advocated for small business customers, with particular emphasis on: • Monthly Service Fees (MSFs);	and includes proposed tariff language.” Decision at 27. SBUA is a party to the Partial Settlement Agreement. <i>Id.</i> at 7 (“Ten parties in this proceeding joined the Partial Settlement Agreement: [including] SBUA... The Partial Settlement Agreement terms propose continued use of the SAPC method for revenue allocation, updating base TOU periods, updating CPP event periods, the creation of a Medium Commercial and Large Commercial and Industrial Class, revising the collection of MSFs and allocation of distribution demand costs for the Small Commercial, Medium Commercial, Large Commercial and Agricultural classes, and changes to Schedules PUBLIC GIR and VGI.”); <i>see also id.</i> at 82 (Finding of Fact (FOF) #1). Similarly, the Decision states that “[t]he Marginal Cost Settlement Agreement (included as Attachment A to this decision) identifies the settlement conditions, states the settlement terms for each settled item, and includes proposed tariff language.” Decision at 10. SBUA is also a party to this agreement. <i>Id.</i> at 8 (“Nine parties in this proceeding joined the Marginal Cost Settlement Agreement: [including] SBUA...”); <i>see also id.</i> at 82 (FOF #3). In addition to the adopted settlement terms themselves, SBUA’s advocacy and representation of small business customers is reflected in its February 15, 2023 Response to SDG&E’s Application; its participation at the PHC (<i>see</i> PHC Reporter’s Transcript, May 10, 2023, at 8:22–23, 11:20–21, 30:6–7, 38:12–13, 47:17–18, 52:24–25, 55:20); and the Direct and Rebuttal Testimony	

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
• Splitting the Medium and Large C&I rate class; • Time-of-Use (TOU) periods; and • TOU differentials across all customer classes. These elements are further discussed below.	of SBUA expert Maureen Reno, admitted as Exhibits SBUA-01 and SBUA-02.	
2. <u>Monthly Service Fees</u> In its Direct Testimony, SBUA urged the Commission to reject SDG&E’s proposed 15 percent increase in MSFs. SBUA-01 at 4 (“[t]he proposed increases in MSFs are excessive and will impose an unacceptable burden on small businesses”). SBUA further explained that it does not support use of the Real Economic Carrying Charge (RECC) method because it violates marginal cost principles and serves only to inflate the cost of customer access equipment. <i>Id.</i> at 8-19. Instead, SBUA recommended the New Customer Only (NCO) method as the more appropriate approach for estimating MSFs, as it more accurately measures marginal customer costs and aligns with CPUC rate design principles. <i>Id.</i> at 4, 10-18; <i>see also</i> SBUA-02 at 2-9 (rebuttal testimony providing additional analysis in	The Partial Settlement Agreement includes a 5 percent increase of MSFs for small business customers, a 10 percent reduction from SDG&E’s initial proposal. Decision at 35. As the Decision explains, “We adopt the Partial Settlement Agreement provisions that resolve issues concerning MSF fees because it is reasonable in light of the whole record, consistent with the law, and in the public interest. It is reasonable to adopt the Partial Settlement Agreement term for SDG&E’s MSF to increase by the following percentages per year for four years: (a) 5 percent per year for small commercial customers...” <i>Id.</i> at 34-35, 85-86 (Conclusion of Law (COL) #10). The Decision also specifically references SBUA’s NCO recommendation and the settlement’s treatment of that issue, noting: “As suggested by Cal Advocates and SBUA, and in accordance with the Partial Settlement Agreement, we do not require SDG&E to use the NCO method to recalculate the MSF as this matter is addressed in our resolution of Marginal Customer Access Costs in the Marginal Cost Settlement Agreement.” Decision at 35.	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
support of SBUA's MSF recommendations).		
3. <u>Small / Medium Commercial Classes</u> SBUA supported SDG&E's proposal to split the medium/large commercial rate class into two distinct rate classes, subject to certain recommendations. SBUA-01 at 19-25. In its Rebuttal Testimony, SBUA further recommended that SDG&E (1) conduct a split study at different peak load levels (50 kW, 100 kW, 200 kW, and 500 kW), including bill impact analysis, and (2) provide shadow billing for informational purposes and bill protection to affected customers. SBUA-02 at 13-16.	The Partial Settlement Agreement adopted in the Decision "provides for the creation of a Medium Commercial Customer Class for SDG&E customers with demand ranging from 20 kW to 200 kW. SDG&E will conduct an analysis of the 20 kW and 200 kW demand threshold and assess the merits for setting the upper demand threshold for the Medium Commercial Customer Class at 100 kW or 500 kW. Based on the results from this analysis, SDG&E will consider revising the upper demand threshold for the Medium Commercial Customer class in its next GRC Phase 2 proceeding." Decision at 41. In evaluating the Partial Settlement Agreement's provisions on the creation of the Medium Commercial Customer Class, the Decision discusses SBUA's testimony and the reasonableness of the Agreement, stating: "SBUA supports SDG&E's proposal but recommends that it (1) recalculate MSF with the NCO method without EPMC scaling (2) study bill impacts for the newly created Medium Commercial Class and the Large Commercial and Industrial class at different peak loads ranging from 50 kW to 500 kW and (3) provide shadow billing and bill protection to impacted customers. SBUA also recommends a study of splitting the class by different peak load levels (e.g., 50 kW, 100 kW)." <i>Id.</i> (fns. omitted). The Decision concludes: "We adopt the Partial Settlement Agreement provisions that resolve issues concerning SDG&E's creation of a Medium Commercial Class	

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
	and rates because they are reasonable in light of the whole record, consistent with the law, and in the public interest. It is reasonable to adopt the Partial Settlement Agreement term for SDG&E to create a new Medium Commercial Customer Class with appropriate rate schedules due to differences in cost of service.... Further, it is reasonable to adopt the Partial Settlement Agreement term for SDG&E to conduct a study that provides certain specified analyses before the next GRC Phase 2, and consider, based on these specified analyses, revising its upper demand threshold for the Medium Commercial Customer Class in its next GRC Phase 2 proceeding...” Decision at 42, 86 (COL # 14 & 15). The Decision similarly notes: “Per SBUA’s request, we do not require SDG&E to use the NCO method to recalculate the MSF for Medium Commercial customers as this matter is addressed in our resolution of Marginal Customer Access Costs in the Marginal Cost Settlement Agreement.” Decision at 42.	
3. <u>Time of Use</u> SBUA supported SDG&E’s proposal to extend its super off-peak period year-round and, in addition, supported Cal Advocates’ recommendation that the Commission require SDG&E to offer a new morning on-peak period and shift the evening on-peak period to better align with high-cost hours.	In the Partial Settlement Agreement, the parties, agreed to “maintaining SDG&E’s base TOU periods but extends the weekday Super Off-Peak period to include the hours 10AM to 2PM year-round. SDG&E will conduct a study to analyze the following: a one-hour shift in the on-peak period, a 5PM–10PM on-peak period, a 3PM–8PM on-peak period, and a weekday 6AM–10AM on-peak period.” Decision at 33 (fns. omitted).	

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
SBUA specifically recommended that the Commission: 1.SDG&E’s proposed extension of its super off-peak period of 10:00 am - 2:00 pm to all months of the year. 2.A new morning on-peak period of 6:00 am - 10:00 am. 3.Shift the current evening on-peak period of 4:00 pm - 9:00 pm to 5:00 pm - 10:00 pm. 4. All remaining hours are off-peak. SBUA-01 at 4, 25-33; SBUA-02 at 13-16.	With respect to the Partial Settlement Agreements TOU periods, the Decision held: “[W]e adopt the Partial Settlement Agreement provisions that resolve issues concerning base TOU periods because it is reasonable in light of the whole record, consistent with the law, and in the public interest. It is reasonable to adopt the Partial Settlement Agreement term for SDG&E to maintain its base Super Off-Peak TOU periods, except to expand the weekday Super Off-Peak period to include 10 AM to 2 PM year-round, because there are no material changes in the underlying costs, is supported by its marginal cost analysis, and will provide customers with greater opportunity to shift load to lower cost hours...” <i>Id.</i> at 32-33, 82 (FOF #7), 85 (COL #8). The Decision further states: “While not originally proposed by SDG&E, it is also reasonable to adopt the Partial Settlement Agreement provision for SDG&E to conduct an analysis to identify high and low cost hours to assess the merit for shifting the on-peak period from 4PM–9PM to 5PM–10PM and assess the creation of a 3PM–8PM on-peak period, and a weekday 6AM–10AM period. SDG&E states that results from these studies will be used to show high and low-cost hours to inform the development of TOU off-peak and Super Off-Peak periods.” Decision at 33; <i>see also id.</i> at 32 (“SBUA asserts that SDG&E’s proposed mid-day Super Off-Peak change is supported by its marginal cost analysis”) (fn. omitted). Finally, the Decision explains that SDG&E “intends to send these results to the service list and will further consider	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
	revision of on-peak periods in its next GRC Phase 2 proceeding.” Decision at 33, 85 (COL #9).	
<u>4. EV-HP Over/under Collection</u> Given the intent of Senate Bill (SB) 350 and Executive Order N-79-20, which establish the State’s goal of reducing carbon emissions through transportation electrification for the benefit of all Californians, SBUA recommended that all ratepayers should share the burden or benefit of any over- or under-collections resulting from the Electric Vehicle High Power (EV-HP) and interim EV-HP rates. SBUA testified that the Commission should approve SDG&E’s proposal to socialize such overages or under collections across all customer classes. SBUA-01 at 20, 23-25. SBUA’s recommendation to recover costs from all ratepayers contrasted with Cal Advocates’ recommendation to recover any over- or under-collection from medium/large customers only.	The Decision held that “it is reasonable to adopt the Partial Settlement Agreement term that any ongoing over/under-collection balances, if any, associated with the EV-HP will be recorded in the two-way HPRBA-E and collected from all customer classes in the distribution rate component. Our determination on this matter is based on prior Commission direction that transportation electrification benefits all customer classes through reduction in emissions and support of the State’s climate goals.” Decision at 46,87-88 (COL #20); <i>see also id</i> at 45 (SBUA agrees any over- or undercollection of EV-HP Rate costs tracked in the HPWBA-E should be paid for and benefit all customers due to the reduced emissions associated with transportation electrification).	
<u>5. Revenue Allocation</u> SBUA supported having the adopted revenue allocation percentages in this proceeding continue to be updated annually using the System	The Decision adopted the Partial Settlement Agreement, which “provides for maintaining the Energy Efficiency revenue allocations adopted in SDG&E’s 2019 GRC Phase 2 proceeding, except to reflect these allocations in the proposed Medium	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
Average Percentage Change (SAPC) method, beginning with 2024 approved determinants in SDG&E's pending 2024 Energy Resource Recovery Account (ERRA) proceeding. SBUA believes that applying CPUC-approved billing determinants on an annual basis is reasonable and in the public interest because it allows rates to adjust in response to changes in customer usage patterns over time. SBUA-02 at 16-21. SBUA further agreed with Cal Advocates' revenue allocation proposal, except with respect to the over/under-collections resulting from the EV-HP, as discussed above.	Commercial Customer Class, updating distribution revenue allocations to better reflect cost-of-service, and adjust the commodity and distribution revenue allocations according to the Commission-approved SAPC methodology, and based on the newest approved and implemented sales forecast." Decision at 48. The Commission further concluded that: "To levelize rate changes, it is reasonable to adopt the Partial Settlement Agreement term for SDG&E to use the SAPC methodology to adjust the distribution and commodity revenue allocations based on SDG&E's newest approved and implemented sales forecast with limited, specified adjustments to move SDG&E's agricultural customer class towards a cost-basis." Decision at 49 , 88 (COL #22 and 23).The Decision also recognizes: "SBUA generally supports Cal Advocates' revenue allocation method but recommends that over or under collection of EV-HP costs should be recovered from all customers." Decision at 47 (fn. omitted).	
6. <u>Marginal Costs</u> SBUA advocated for adoption of the Marginal General Capacity Cost (MGCC) set forth in the Marginal Cost Settlement Agreement and opposed the alternative proposal sponsored by the Solar Energy Industries Association (SEIA). The Settlement Agreement's adopted MGCC value of \$141.11 per kilowatt-year	Consistent with SBUA's advocacy, the Commission's adoption of the Marginal Cost Settlement Agreement resolves marginal cost issues in a manner that serves the public interest, including small business consumers. The Commission determined that the Marginal Cost Settlement Agreement "resolve[s] issues concerning MDCCs because it is reasonable in light of the whole record, consistent with the law, and in the public interest." Decision at 13.	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
(\$/kW-year), derived from the 2019 marginal commodity study, represents a compromise among the MGCC values proposed by the parties. SBUA also emphasized that the Marginal Cost Settlement Agreement does not preclude intervenors from submitting alternative marginal costs in future proceedings. Together with the California Farm Bureau Federation (Farm Bureau) and Cal Advocates, SBUA jointly advocated for adoption of the MGCC in the Marginal Cost Settlement Agreement rather than SEIA's proposal. <i>See</i> Joint Reply Comments of Cal Advocates, SBUA, and Farm Bureau in Support of the Marginal Cost Settlement Agreement, July 12, 2024.	The adoption of the Marginal Cost Settlement Agreement, despite opposition from SEIA, reflected the support of SBUA and the settling parties. As the Decision explains: "Counter to SEIA's argument, Cal Advocates, SBUA, and Farm Bureau state that interveners have the opportunity to submit alternative marginal costs, including MDDCs, in future proceedings that reflect more recent cost data and cost-of-service trends." Decision at 15, 84 (COL #1 & 3). "As noted by Cal Advocates, SBUA, and Farm Bureau, interveners may propose updated MDDC values based on more recent distribution load data." <i>Id.</i> at 15. In adopting this settlement, the Decision observes that: "Cal Advocates, SBUA, and FEA state that if SEIA's MGCC proposal is adopted it could 'significantly increase rates and bills for customers unable to shift their usage from more expensive on-peak periods to less expensive TOU periods.'" Decision at 24.	

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	

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. If so, provide name of other parties: Additional parties to the Settlement Agreements signed by SBUA with potentially similar positions included the Utility Consumers' Action Network (UCAN), Farm Bureau, SEIA, and The Utility Reform Network (TURN).	
d. Intervenor's claim of non-duplication: SBUA participated exclusively on behalf of small business customers, a customer class not otherwise well represented in this proceeding. No other party focused exclusively on the interests of small business customers in the context of this General Rate Case Phase 2 proceeding. While other parties joined the two Settlement Agreements to which SBUA was a signatory, SBUA's advocacy throughout the proceeding and in settlement negotiations remained distinct and focused on the interests of small business customers, which, particularly in GRC Phase 2 proceedings, can conflict with the interests of other ratepayer classes. SBUA contributed to the development of the Settlement Agreements in ways not addressed by other parties. Throughout the proceeding, SBUA made reasonable efforts to minimize duplication and ensured that its participation supplemented and expanded, rather than repeated, the positions of other stakeholders. For these reasons, the Commission should find that SBUA's perspectives and goals were necessarily distinct from those of other parties and that SBUA's efforts supplemented and expanded, rather than duplicated, the efforts of parties on issues of common interest.	

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:	

SBUA actively participated in this proceeding from 2023 through 2025 to advance the interests of small business ratepayers. To that end, SBUA engaged in discovery, researched and drafted expert testimony, attended the pre-hearing conference, attended extensive settlement conferences, negotiated and executed two settlement agreements, and drafted and contributed to arguments for joint filings supporting the settlement agreements. SBUA submits that its expenditure of resources and costs, incurred to represent small business customers in this proceeding, were reasonable and merit an award of compensation. The Decision's adopted settlements provide meaningful benefits to small commercial customers by resolving complex marginal cost, rate design, and revenue allocation issues through reasonable compromise rather than litigation. As a result of SBUA's work, small business customers benefited, for example, from limiting SDG&E's proposed Monthly Service Fee increases to 5 percent per year rather than the originally proposed 15 percent; improvements to TOU periods and rates, including expansion of the super off-peak period and required analysis of additional on-peak refinements; and further analytical work, such as peak load threshold studies and TOU cost-hour analysis, to inform future GRC Phase 2 applications. Although not all of these benefits are quantifiable, the adoption of the SBUA-executed settlement agreements protects an important and often underrepresented customer class and advances the public interest. As discussed above, the Commission expressly cited, analyzed, and adopted settlement terms that reflect SBUA's testimony and negotiated positions. These substantive contributions warrant the requested compensation, given the significant implications for small business ratepayers who will benefit from SBUA's GRC Phase 2 advocacy and the adopted Settlement Agreements.	
b. Reasonableness of hours claimed: SBUA devoted the resources of two attorneys and one expert to this proceeding, and seeks the recovery of 341.2 hours of professional time, excluding compensation related hours. Given the importance of this docket to small business customers, SBUA submits that the hours these professionals dedicated reflect a reasonable and efficient use of resources. These hours were warranted given the proceeding's complexity and technical demands, which required significant expertise, detailed analysis, extensive negotiations, and active engagement across multiple contested issues. Additionally, because UCAN, TURN, and Cal Advocates primarily concentrate on residential customers, it is reasonable that SBUA, as the sole intervenor exclusively representing small commercial customers, devote the significant resources necessary to maintain a strong presence in settlement negotiations and to develop distinct positions from other ratepayer advocates on behalf of this customer class.	

SBUA Litigation Supervisor, Jennifer Weberski, an SBUA employee with approximately 25 years of regulatory experience, worked on legal filings and coordinated SBUA's settlement engagement. Drawing on SBUA's participation in related rate proceedings and her decades of legal expertise, Ms. Weberski efficiently engaged and devoted a reasonable amount of time. SBUA also retained outside expert Maureen Reno, who has over 25 years' experience in public utility regulation, including prior work involving rate design, marginal cost methodologies, revenue allocation, and bill impact analysis. Ms. Reno assisted in discovery, prepared SBUA's direct and rebuttal testimony, and helped refine SBUA's settlement positions. Her work was performed on a deferral basis, and her invoices are attached as <u>Attachment 3</u>. In addition, SBUA's General Counsel, James Birkelund, participated in this proceeding by analyzing party filings, developing litigation positions, providing strategic direction, and overseeing the legal team. Mr. Birkelund served on a contingency basis through E&E Law Corp. at prevailing market rates. <i>See Attachment 4</i> (attorney-client agreement, filed under seal). The Commission has previously approved this outside consultant arrangement. <i>See, e.g.</i>, D.25-05-023 (approving Mr. Birkelund's outside counsel relationship at market rates), D.25-05-021, D.25-03-029, D.25-04-012, and D.25-02-025. SBUA maintains that the time recorded represents an appropriate level of engagement and effort necessary to participate in this proceeding. Accordingly, SBUA seeks compensation for all hours submitted by its attorneys and expert, as set forth in the attached timesheets.	
c. Allocation of hours by issue: 1 Monthly Service Fees – 56.2 hrs. or 16.5% 2 Small/Medium Rate Classes – 30.5 hrs. or 8.9% 3 TOU Periods/Differentials – 56.7 hrs. or 16.6% 4 EV-HP over/under collection – 15.4 hrs. or 4.5% 5 Revenue Allocation – 49.65 hrs. or 14.6% 6 Marginal Costs – 109 hrs. or 31.9% 7 Hearings and Conferences – 8.75 hrs. or 2.6% 8 General Participation – 15 hrs. or 4.4%	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Jennifer Weberski	2023	44	\$705	D.24-02-031	\$31,020.00			
Jennifer Weberski	2024	110.7	\$735	D.25-06-029	\$81,364.50			
Jennifer Weberski	2025	5.5	\$760	As above, escalated by 3.46% for 2025	\$4,180.00			
Maureen Reno	2023	59.5	\$370	D.24-10-021	\$22,015.00			
Maureen Reno	2024	71	\$385	As above, escalated by 4.07% for 2024	\$27,335.00			
James Birkelund	2023	26	\$770	D.24-10-025	\$20,020.00			
James Birkelund	2024	22.25	\$800	D.24-12-069	\$17,800.00			
James Birkelund	2025	2	\$830	D.25-07-036	\$1,660.00			
Subtotal: \$205,394.50						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 \$
Subtotal: \$ 0						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
James Birkelund	2023	0.25	\$385	50% of 2023 Rate	\$96.25			

Jennifer Weberski	2023	2.75	\$337.5	50% of 2023 Rate	\$928.13			
Jennifer Weberski	2025	15.5	\$380	50% of 2025 Rate	\$5,890.00			
Subtotal: \$6,914.38						Subtotal: \$		
COSTS								
#	Item	Detail		Amount	Amount			
1.								
2.								
Subtotal: \$ 0						Subtotal: \$		
TOTAL REQUEST: \$212,308.88						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								
ATTORNEY INFORMATION								
Attorney		Date Admitted to CA BAR ³		Member Number		Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation		
James M. Birkelund		March 2000		206328		No		
Jennifer L. Weberski		Admitted (Connecticut, 1997; Washington D.C., 2003)		Conn. Bar No. 414546; D.C. Bar No. 481853.		No		

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

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

³ This information may be obtained through the State Bar of California's website.

Attachment 2	Timesheets of Attorneys & Experts
Attachment 3	Invoices for Maureen Reno
Attachment 4	Attorney-Client Agreement with E&E Law

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 (<i>see</i> Rule 14.6(c)(6))?	
--	--

If not:

Party	Comment	CPUC Discussion

(Green items to be completed by Intervenor)

FINDINGS OF FACT

1. **SMALL BUSINESS UTILITY ADVOCATES** [has/has not] made a substantial contribution to D.25-09-006

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

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	(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
SMALL BUSINESS UTILITY ADVOCATES	11/21/25	\$212,308.88		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Jennifer	Weberski	Attorney	\$705	2023	
Jennifer	Weberski	Attorney	\$735	2024	
Jennifer	Weberski	Attorney	\$760	2025	
Maureen	Reno	Expert	\$370	2023	
Maureen	Reno	Expert	\$385	2024	
James	Birkelund	General Counsel	\$770	2023	
James	Birkelund	General Counsel	\$800	2024	
James	Birkelund	General Counsel	\$830	2025	

(END OF APPENDIX)

ATTACHMENT 2

Excel Time Sheets of SBUA Attorney and Outside Experts

Application No. 23-01-008 - Request for Intervenor Compensation
Attachment 2. Time Sheet Records with Allocation of Hours by Issue and Contribution to Decision (D).25-09-006

Time Sheet Entries for Attorney Jennifer Weberski

Issue Identification

- 1 Monthly Service Fees
- 2 Small/Medium Rate Classes
- 3 TOU Periods/Differentials
- 4 EV-HP over/under collection
- 5 Revenue Allocation
- 6 Marginal Costs
- 7 Hearings and Conferences
- 8 General Participation

<u>Date</u>	<u>Activity</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>	<u>Issue 5</u>	<u>Issue 6</u>	<u>Issue 7</u>	<u>Issue 8</u>
1/19/23	Discuss Application with J. Birkelund	0.25	0.25	0.25					
1/20/23	Analyze SBUA issues.	0.75				0.25	0.25		
1/23/23	Strategy meeting w attorneys (internal) re SBUA response to application	0.2	0.2	0.1					
1/24/23	Strategy meeting with attorneys (internal) re SBUA response to application					0.25	0.25		
2/2/23	Review notice of disclosure of confidential information								0.25
2/14/23	Edit Response to Application	0.25				0.5	0.5		
2/15/23	Edit and finalize Response to Application		0.5	0.5					
2/28/23	Review party Protests/Responses	0.25	0.25	0.3		0.2	0.5		
3/9/23	Review SDG&E reply to Protests/Responses	0.25	0.25	0.25		0.25			
4/1/23	Review ALJ rulings on parties								0.25
4/12/23	Discuss staffing with J. Birkelund								0.25
4/26/23	Review email ruling re PHC							0.25	
5/1/23	Review ALJ notice of PHC for 5/10							0.25	
5/10/23	Review Agenda for PHC per ALJ email							0.5	
5/10/23	Attend PHC							1.5	
6/5/23	Review Scoping Memo & Ruling	0.25	0.25	0.25		0.25	0.25		
6/12/23	Email discussion w parties on need for schedule clarification	0.5							
									0.5
6/13/23	2nd email discussion with parties on need for Commission clarification	0.25							0.25
6/26/23	Email edits to clarify schedule ext request	0.75							0.75
8/2/23	Review ALJ ruling modifying schedule	0.25							0.25
9/29/23	Review Cal Adv request to ALJ regarding schedule issues	0.25							0.25
9/30/23	Analyze SDGE suppl. Testimony with bill impacts on small businesses		3.25						
10/6/23	Strategy discussion w/ expert on testimony		0.5						
11/16/23	Confer with J. Birkelund re discovery strategy	0.25	0.25						
11/17/23	Confer w M. Reno re discovery strategy	0.25	0.25						
11/17/23	Email with SDG&E and M. Reno to execute NDA								0.75
11/21/23	Call with M. Reno on marginal costs						1		
11/21/23	Email with SDG&E on discovery						0.25		
11/26/23	Finalize data requests to SDGE	1	1				1.25		
12/9/23	Analyze Cal Advocates testimony	0.5	0.5	1	0.5	1	1		
12/15/23	Draft DR for Cal Advocates	0.25	1			0.25	0.75		
12/15/23	Call with M. Reno regarding rate design		0.5						
12/15/23	Outline testimony for expert	1	0.75	0.75	0.25				
12/15/23	Begin analysis of Cal Advocates workpapers			0.25			1		
12/17/23	Continue analysis of Cal Advocates test and workpapers for DRs	1	0.25			1			
12/18/23	Call with M. Reno regarding rate design & cost studies.						1		
12/19/23	Finalize data requests to Cal Advocates on marginal costs						1.75		
12/21/23	Call with M. Reno on small/med customer class & TOU		0.25	0.25	0.25				
12/27/23	Email discussion with Cal Advocates and M. Reno re DR						0.75		
1/2/24	Analyze DR responses from Cal Advocates						2		
1/3/24	Edit direct testimony - MSF	1.75							
1/8/24	Finalize edits to M. Reno testimony - TOU			1.25					
1/8/24	Analyze parties Direct Testimony - TOU			2.75					
1/9/24	Analyze parties Direct Testimony - rate design	1	1.25						
1/10/24	Analyze parties Direct Testimony - marginal costs						3		
1/11/24	Review Cal Ad DR to SBUA for responses						1.5		

<u>Date</u>	<u>Activity</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>	<u>Issue 5</u>	<u>Issue 6</u>	<u>Issue 7</u>	<u>Issue 8</u>
1/12/24	Drafted initial data response for M. Reno from SDGE	1	0.25						
1/12/24	Participate in Settlement discussion kick-off with parties	0.25		0.25		0.25	0.25		
1/12/24	Draft and finalize SBUA DR 1 to FEA	1				0.25			
1/12/24	Draft and finalize response to TURN on DR 1	0.5	0.25	0.25		0.25	0.25		
1/13/24	Discuss rate impact studies for SDGE to run for settlement		0.25				1		
1/16/24	Review TURN Errata					1			
1/16/24	Finalize SBUA response to SDGE on DR 2	0.5		0.5					
1/17/24	Call with M. Reno prior to discussion with SDGE on small business and marginal costs						0.5		
1/17/24	Participate in call with SDGE on sm. class costs						0.5		
1/17/24	Participate in settlement call - Class Cutoffs & Marginal costs				0.5		1		
			0.5						
1/22/24	Participate in settlement call - Class cutoffs; rate impacts		1		1				
1/23/24	Analyze DR set 3 responses	0.25				1	1		
1/24/24	Participate in settlement on bill impacts					1			
1/26/24	Analyze Cal Ad responses to set 3					1.75			
1/31/24	Call with M. Reno on revenue allocation					1.25			
1/31/24	Participate in settlement call - MSFs & TOU	0.75		0.75					
2/3/24	Edit M. Reno rebuttal testimony - rate design	1	0.5						
2/7/24	Finalize edits to M. Reno testimony - allocation					1.25			
2/8/24	Analyze parties Rebuttal Testimony - marginal costs						2.75		
2/9/24	Analyze parties Rebuttal Testimony - allocation					2.75			
2/12/24	Participate in settlement call - litigation dates and SAPC						2		
2/14/24	Participate in settlement call - MSFs, TOU, marginal costs	1		1			0.5		
2/14/24	Call with M. Reno re settlement discussions	0.5							
2/21/24	Participate in settlement call -MSFs, RA	1				1			
2/26/24	Participate in settlement call - EV-HP over/under				2				
2/28/24	Participate in settlement call -EV-HP over/under, rev all				1.5				
3/1/24	Call on MSFs for small commercial customers	1							
3/4/24	Participate in settlement call -revenue allocation					1.5			
3/6/24	Participate in settlement call - litigation check/finalize issues					1.5			
3/11/24	Participate in settlement call - revenue allocation					1.5			
3/13/24	Participate in settlement call -MC scenarios						1.5		
3/15/24	Analyze 3 marginal cost scenarios for settlement discussions						1.25		
							1.5		
3/18/24	Participate in settlement call - marginal cost scenarios						0.5		
3/18/24	Call with M. Reno re settlement discussions - marginal cost scenarios								
3/20/24	Conduct side settlement call with intervenors on MSFs	0.5							
3/20/24	Participate in settlement call on MSFs	1.5							
3/22/24	Analyze updated marginal scenarios for 3/25 call						1		
3/25/24	Participate in settlement call - marginal costs						1.5		
3/27/24	Participate in settlement call - small business MSFs & Marginal costs	0.75					0.75		
3/27/24	Review updated marginal cost docs for settlement						1		
4/1/24	Participate in settlement call - marginal costs & TOU			0.5			1		
4/3/24	Review updated docs for call w/ TOU and allocation updates based on 4/1 discussion			0.5		0.5			
4/3/24	Participate in settlement call - marginal costs						1.5		
4/15/24	Participate in settlement call on drafts for both Partial & MC settlements						1.5		
4/16/25	Edits to Partial Settlement for small business reflections	0.75							
4/16/24	Email discussion with SDGE atty on TOU periods			0.75					
4/17/24	Review SEIA edits to Partial Settlement - TOU section			1					
4/17/24	Review and edit 1st draft of Marginal Cost Settlement						1.25		
4/18/24	Edit to Partial Settlement on TOU			1.25					
4/18/24	Follow-up discussion with SDGE on SBUA position on TOU			1.25					
4/22/24	Participate in settlement call -drafting language			1					
4/22/24	Email discussion on TOU with M. Reno			0.75					
4/23/24	Discuss via email TOU edits with SEIA for editing			1					
4/24/24	Participate in settlement call -updates for STC							1.5	
4/25/24	Attend virtual STC	1						1	
4/29/24	Participate in settlement call - drafting language	0.25	0.25			1			
4/30/24	Edit Partial Settlement on M/L/TOU		0.25	1					
5/1/24	Edit for overall comparison	0.25	0.25	0.25					

<u>Date</u>	<u>Activity</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>	<u>Issue 5</u>	<u>Issue 6</u>	<u>Issue 7</u>	<u>Issue 8</u>
5/1/24	Participate in settlement call - drafting language			0.5		1			
5/8/24	Participate in settlement call to finalize settl. docs					1			
5/9/24	Edits to Partial Settlement for small business issues	0.75		0.5		0.5			
5/10/24	Email discussion w/ SDGE on blanket language needed					0.75			
5/15/24	Participate in settlement call to finalize settl. docs	0.5	0.5	0.5		0.5			
5/16/24	Finalize SBUA edits to Joint filing						0.5		
5/17/24	Emails to Company re Joint filing						0.2		
5/22/24	Participate in settlement call to finalize settl. Docs	1							
5/22/24	Review and edit final Partial Settlement Agreement docs	0.25	0.25	0.25	0.25				
5/23/24	Discuss final Partial Settlement Agreement w/ SBUA	0.25							
5/30/24	Email agreement with parties on briefing schedule								0.25
7/1/24	Email discussion w/ parties on SEIA's opposition filing to Marginal Cost Agreement						0.75		
7/11/24	Review and edit w/Cal Advocates on Joint Reply						0.75		
8/2/24	Email discussion with parties on need for schedule clarification								0.5
8/5/24	Review and edit Joint mtn to ALJ regarding briefing and filings								0.5
11/19/24	Review ALJ request for comments on Marginal Cost Settlement and Staff Report						0.5		
11/20/24	Email discussion with parties regarding ALJ ruling						0.75		
11/21/24	Email discussion on route to addressing ALJ ruling						1		
11/22/24	Additional discission w/ parties how to address ALJ ruling						1.25		
11/27/24	Edit Joint Motion for Reconsideration						0.75		
12/2/24	Edit and confirm SBUA joining Joint Mtn for Recon.						0.75		
2/3/25	Review ALJ ruling rescinding Nov. request						0.25		
8/13/25	Review PD for Settlement adoptions								0.5
8/26/25	Response to SDGE on Partial Settl. Agreement ext. to comply			0.25					
9/3/25	Review party comments on PD			1			1		
9/8/25	Review party reply comments on PD						0.75		
9/9/25	Review party reply comments on PD			1.25					
9/22/25	Review SDGE ex parte notice for concerns over stlmt adoption	0.25							0.25
	Totals:	27.95	15.70	24.15	6.25	25.45	50.20	5	5.5
Compensation Related Hours									
6/1/23	Draft NOI	1.25							
6/2/23	Edit and finalize NOI	1							
6/16/23	Review UCAN email on NOI extension	0.5							
10/23/25	Review final decision	0.75							
10/31/25	Begin drafting comp claim	2.25							
11/2/25	Draft comp claim	3.75							
11/5/25	Draft comp claim	3.25							
11/6/25	Draft comp claim	4.5							
11/21/25	Finalize comp claim	1							
	Total:	18.25							

Application No. 23-01-008 - Request for Intervenor Compensation
Attachment 2. Time Sheet Records with Allocation of Hours by Issue and Contribution to Decision (D).25-09-006

Time Sheet Entries for Expert Maureen Reno

Issue Identification

- 1 Monthly Service Fees
- 2 Small/Medium Rate Classes
- 3 TOU Periods/Differentials
- 4 EV-HP over/under collection
- 5 Revenue Allocation
- 6 Marginal Costs
- 7 Hearings and Conferences
- 8 General Participation

<u>Date</u>	<u>Activity</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>	<u>Issue 5</u>	<u>Issue 6</u>	<u>Issue 7</u>	<u>Issue 8</u>
11/16/23	Read company filing regarding rate design (Ch 3 & 8)	1	1	1					
11/16/23	Call with client (James at SBUA) to discuss rate design	0.5	0.25	0.25					
11/17/23	Read company filing regarding Commodity and Distribution Cost Studies (Ch 4 & 5)	1					1		
11/19/23	Prepared discovery re testimony on Rate Design (Ch 3 & 8)	1	0.75	1					
11/21/23	Call with client (Jennifer at SBUA) to discuss rate design and cost studies						1		
11/22/23	Prepared discovery requests re testimony on Commodity and Distribution Cost Studies (Ch 4 & 5)						2.5		
11/26/23	Wrote discovery set 1						1		
12/13/23	Wrote sections of testimony: outline of topics: monthly service fees ("MSF") & time of use periods ("TOU").	2		2					
12/14/23	Research on new customer only ("NCO") method						3		
12/15/23	Read Cal Advocates filing & research commission precedent			1		2	2		
12/15/23	Call with client (Jennifer at SBUA) regarding rate design.		0.5						
12/17/23	Research commission precedent cost studies & rate design	1		1			2		
12/18/23	Read Cal Advocates filing Re cost studies & rate design			1		0.5	2		
12/18/23	Call with client (Jennifer at SBUA) regarding rate design & cost studies.						1		
12/18/23	Wrote discovery question on Cal Advocates filing Re NCO method and Monthly service fees	0.75					0.25		
12/19/23	Wrote sections of testimony RE NCO method and monthly service fees	1.5					0.5		
12/20/23	Conducted research & wrote testimony RE cost studies (NCO & equal percentage marginal costs.						4		
12/21/23	Research & wrote discovery re customer reclassification & time of use periods		1	3	2				
12/21/23	Call with client (Jennifer at SBUA) Re customer classes reclassification & time of use periods		0.25	0.25	0.25				
12/22/23	Wrote sections of testimony & wrote discovery questions Re Ch 1 integrated resource plan					2.5			
12/28/23	Research & wrote sections of testimony RE splitting C&I customer class proposal		2.5		2.5				
12/31/23	Research & wrote sections of testimony RE TOU periods and cost differentials			4					
1/1/24	Conducted research & wrote sections of testimony pertaining to Monthly Service Fees	4							
1/2/24	Conducted research and wrote section of testimony pertaining to dividing the M/L C&I class		1		3				
1/3/24	Conducted research and wrote testimony pertaining to TOU periods.			4					
1/4/24	Researched commodity cost study and rulemaking in 20-05-003 and conducted quality check on testimony tables & figures						4		
	Conducted quality check on data, tables, and testimony.			3		1	2		
1/13/24	Responded to interrogatory from company.	1					1		
1/13/24	Wrote new interrogatories for the company	0.5	0.5	0.5					
1/13/24	Analyzed intervenor testimony	0.5							
1/17/24	Participated in call with client to prepare for call with Company						0.5		
1/17/24	Participated in call with Company						0.5		
1/17/24	Prepared for settlement call.	0.5					0.5		
1/17/24	Attended settlement call with SDG&E and intervenors.		0.5		0.5		1		
1/22/24	Attended settlement call as SBUA expert on rate impacts		1				1		
1/23/25	Reviewed filing and interrogatory responses.	0.5				0.5	1		
1/24/24	Bill Impacts Discussion/Settlement					1	1		
1/30/24	read intervenor testimonies					1	1		
1/30/24	wrote sections of rebuttal testimony	1		1					

<u>Date</u>	<u>Activity</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>	<u>Issue 5</u>	<u>Issue 6</u>	<u>Issue 7</u>	<u>Issue 8</u>
1/31/24	Participated in calls with client regarding revenue allocation					1.25			
1/31/24	Participated in settlement call as SBUA expert on RA					1.5			
1/31/24	conducted research on revenue allocation and wrote section of rebuttal testimony					2			
2/1/24	Conducted research to write sections of rebuttal testimony pertaining to split class & TOU differentials		2	2					
2/2/24	Wrote section of rebuttal testimony on NCO-RECC method						4		
2/3/24	conducted research on RA					2			
2/3/24	wrote testimony on revenue allocation					3			
2/6/24	conducted quality check on testimony and attachments					0.5	0.5		
2/7/24	Conducted quality check on data, tables, and testimony.	1		1					
2/12/24	Participated in settlement call as SBUA expert on testimony						2		
2/14/24	Participated in settlement call as SBUA expert on MSFs/TOU	1		1					
2/14/24	Participated in call with client to discuss settlement	0.5							
2/14/24	Read rebuttal testimonies on rate design	0.5							
3/18/24	Read latest settlement documents and analyzed excel file				0		2		
3/18/24	Participated in settlement call as SBUA expert on marginal costs						1.5		
3/18/24	Participated in call with client to discuss settlement						0.5		
3/27/24	Participated in settlement call as SBUA expert on marginal costs	0.75					0.5		
	Totals:	20.5	11.25	27	8.25	18.75	44.75	0	0

Application No. 23-01-008 - Request for Intervenor Compensation
Attachment 2. Time Sheet Records with Allocation of Hours by Issue and Contribution to Decision (D).25-09-006

Time Sheet Entries for General Counsel James M. Birkelund

Issue Identification

- 1 Monthly Service Fees
- 2 Small/Medium Rate Classes
- 3 TOU Periods/Differentials
- 4 EV-HP over/under collection
- 5 Revenue Allocation
- 6 Marginal Costs
- 7 Hearings and Conferences
- 8 General Participation

<u>Date</u>	<u>Activity</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>	<u>Issue 5</u>	<u>Issue 6</u>	<u>Issue 7</u>	<u>Issue 8</u>
	Initial rev of SDG&E Application and Supporting Testimony	0.5				0.5	0.5		
1/18/23	Crrspnd to Litigation Team re SBUA planned intervention.	0.25				0.25	0.25		
1/19/23	Analysis of SDG&E testimony and outline SBUA concerns.	1.5		1.5		1	1.75		
1/19/23	Call w J. Weberski re SBUA positions.	0.25	0.25	0.25					
1/20/23	Addn analysis and identification of SBUA issues.	0.5	0.25	0.25		0.5	0.5		
2/27/23	Rev protests of other parties.	0.75				0.75	0.75		
3/9/23	Rev SDG&E reply to protests and responses.	0.1	0.1	0.1		0.1	0.1		
4/12/23	Call w J. Weberski re experts.								0.25
4/27/23	Read ALJ ruling setting PHC.							0.25	
4/27/23	Read C4AT request to ALJ to reschedule PHC.							0.25	
5/8/23	Call w expert re strategy in case.	0.1					0.15		
5/9/23	Rev PHC agenda.							0.25	
5/11/23	Analysis of Joint CCAs cmmts on rate design principles.						0.5		
5/11/23	Emails w parties re PHC Agenda							0.5	
6/5/23	Rev Cmr Scoping Memo.	0.1	0.1	0.1		0.1	0.1		
6/9/23	Read PAO's request for agmt to schedule change for rebuttal and EH.								0.25
6/12/23	Read SDG&E counterproposal for scheduling changes.								0.25
6/19/23	Rev PAO's mt to amend Scoping Memo.						0.25		0.25
6/27/23	Read SDG&E proposed extension re Supp Test w 2023 Sales Forecast								0.25
6/27/23	Addn emails w parties re extension.								0.25
6/28/23	Rev SDG&E's Mt for Reconsideration of Ruling re sales forecast.						0.25		
6/29/23	Strategy crrspnd w J. Weberski re testimony.								0.25
7/11/23	Rev SDG&E's follow-up email to ALJ re Clarification of Ruling.								0.25
7/21/23	Read Ruling on SDG&E's Mt to Extend Deadline for Supp Test.								0.25
7/31/23	Rev CalAdv and SDG&E joint request to further modify schedule.								0.25
8/3/23	Read ALJ Ruling Revising Proc Schedule								0.25
9/6/23	Strategy call w J. Weberski re PCF, TURN opp to ext for test.								0.25
9/29/23	Rev ALJ ruling modifying proc schedule.								0.25
10/2/23	Rev SDG&E's revised testimony re rate design, small commercial customers.		0.5	0.5					
10/20/23	Rev ALJ ruling re PPH.							0.25	
11/13/23	Emails w expert M. Reno re legal strategy	0.1					0.15		
11/14/23	Rsch and outline potential areas of testimony for expert.	0.3	0.2	0.2			0.3		
11/14/23	Tew M. Reno re the same.	0.05	0.05	0.05			0.1		
11/16/23	Crrspnd w M. Reno re rate design.		0.5	0.5					
11/16/23	Crrspnd w J. Weberski re discovery.	0.25							
11/21/23	Rev M. Reno draft of SBUA 1st set of discovery.	0.25	0.25						
11/21/23	Strategy emails w J. Weberski re scope of direct testimony.	0.1	0.1	0.1			0.2		
11/29/23	Crrspnd w J. Weberski re direct testimony.	0.05	0.05	0.05			0.1		
12/20/23	As above.	0.25					0.25		
12/28/23	Confer w Litigation Team re SBUA DR set 2 to PAO.						0.25		
12/28/23	Crrspnd w PAO re the same.						0.25		
1/3/24	Rev SDG&E follow-up re request for extension.								0.25
1/3/24	Rev PAO response to SBUA-DR 2.						0.25		
1/5/24	Rev Joint Statement of PG&E, Cal Advocates, TURN, and CUE re Ph2 schedule.								0.25
1/5/24	Rev M. Reno draft of direct testimony.	0.5	0.25	0.25			0.25		
1/9/24	Rev ALJ's modification of procedural schedule.								0.25
1/9/24	Rev PAO's DR to SBUA.					0.25			
1/9/24	Confer w J. Weberski re first stlmt call w IOU and others.	0.05	0.05	0.05		0.05	0.05		
1/9/24	Analyze other parties' positions in direct testimony.	0.1	0.1	0.1		0.1	0.1		
1/16/24	Rev TURN errata testimony								0.25
1/26/24	Confer w J. Weberski re strategy for SBUA rebuttal test.				0.25				
2/2/24	Confer w J. Weberski re SBUA positions on Revenue Allocation.					0.25			
2/5/24	Rev SDG&E request for clarification re status conf.							0.25	
2/5/24	Rev M. Reno draft of rebuttal.	0.25	0.25	0.25	0.25	0.25			
2/6/24	Crrspnd w Litigation Team re the same.	0.1	0.1	0.1	0.1	0.1			
2/13/24	Rev other parties' rebuttal test.	0.1	0.1	0.1		0.1	0.1		
2/15/24	Confer w J. Weberski re stlmt strategies on rev alloc.					0.25			
2/16/24	Rev ALJ Ruling re Status Conference							0.25	
2/22/24	Confer w J. Weberski re stlmt positions.	0.05	0.05	0.05	0.05	0.05			
2/27/24	Rev Jt Status Report								0.25
2/29/24	Call w J. Weberski re fixed charges for small commercial customers.	0.25							
3/5/24	Rev ALJ ruling extending briefing schedule for stlmt discussions.								0.25
3/21/24	Analysis re stlmt scenarios impacting small commercial customers.					0.25			
3/28/24	Strategy call w J. Weberski re 5% cap for Sm Bus.					0.25			

<u>Date</u>	<u>Activity</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>	<u>Issue 5</u>	<u>Issue 6</u>	<u>Issue 7</u>	<u>Issue 8</u>
4/4/24	Confer w J. Weberski re SBUA position on Partial Stlmt.	0.05	0.05	0.05		0.1			
4/15/24	Rev SDG&E's inquiry re 2nd status confer.							0.25	
4/17/24	Rev ALJ Ruling re 2nd Status Conf.							0.25	
4/18/24	Confer w J. Weberski re marginal costs.						0.25		
4/25/24	Analysis re partial stlmt agreements (marginal cost).						0.25		
5/2/24	Cnslt w J. Weberski re stlmt on Marginal Cost Stlmt Agmt.						0.25		
5/7/24	Rev ALJ Ruling re Need for EH.							0.25	
5/9/24	Confer w J. Weberski final stlmt terms.						0.25		
5/10/24	Rev ALJ Direction to File Jt Mt to Admit Exhs into Record.								0.25
5/14/24	Rev Ruling re Setting Dates for EH							0.25	
5/15/24	Rev Jt mt to admit exhs.								0.25
5/15/24	Rev uncontested and stipulated facts, respectively, for stlmt.	0.2	0.1	0.1	0.1	0.1	0.15		
5/16/24	Strategy call w J. Weberski re stlmt terms.	0.05	0.05	0.05	0.05	0.05			
5/17/24	Rev SDG&E 2nd Revised Direct and Supp Test								0.25
5/18/24	Rev SDCP CEA Response to ALJ Ruling re EH.							0.25	
5/20/24	Rev SDG&E's reply re EH.							0.25	
5/21/24	Rev ALJ ruling removing EH.							0.25	
5/22/24	Rev revised terms in Partial Stlmt Agmt.	0.5							
5/22/24	Rev revised terms in Marginal Cost Stlmt Agmt.						0.5		
5/23/24	Call w J. Weberski re the same.						0.25		
5/24/24	Rev SDG&E mt to seal.								0.25
5/28/24	Rev Jt Mt to Adopt Marg Cost Stlmt.						0.25		
5/28/24	Rev SDG&E response to Jt CCA Mt re Exhs.								0.25
5/29/24	Rev CCAs Reply to SDG&E Response.								0.25
5/30/24	Rev ALJ crrespnd re briefing schedule.								0.25
6/5/24	Rev Jt Mt to approve Medical Baseline Stlmt								0.25
6/7/24	Rev ALJ Ruling Granting Jt Mt to Enter Exhs into Evid Record.								0.25
6/28/24	Rev SEIA Opposition to Marginal Cost Stlmt.						0.25		
7/3/24	Confer w J. Weberski re SBUA response (opp or reply cmmt) to SEIA.						0.25		
7/3/24	Rev Jt Cmmts in Opp to Medical Baseline Stlmt.								0.25
7/10/24	Confer w J. Weberski re SBUA joining Cal Advocates' reply cmmt to SEIA opp.						0.25		
7/12/24	Rev jt reply of PAO, SBUA, etc. ISO of marginal cost stlmt.						0.5		
7/13/24	Rev SDG&E reply cmmts ISO marginal cost stlmt.						0.5		
7/22/24	Conferral w SDCP and CEA re proposal for extension of deadlines for briefs.								0.25
7/23/24	Rev jt reply re medical services stlmt.								0.25
7/26/24	Rev Ruling Setting Dates for Op and Reply Briefs.								0.25
8/6/24	Rev PAO's email to ALJ re briefing instructions.								0.25
8/7/24	Rev ALJ Qs for Settling Parties re MC Stlmt Agmt						0.25		
8/7/24	Cnslt w J. Weberski re briefing issues.						0.25		
8/9/24	Rev SCE's email to ALJ re errors in marginal cost analysis						0.25		
8/30/24	Rev parties' reply briefs re unsettled issues.								0.25
11/19/24	Rev ALJs ruling requesting cmmts on Marginal Commodity Costs.						0.5		
11/20/24	Rev CalAdv proposal re cmmts schedule.								0.25
11/21/24	Rev CalAdv request to ALJ to modify schedule.								0.25
11/27/24	Confer w J. Weberski re staff report implications on stlmt agmt.						0.25		
12/3/24	Confer w J. Weberski re mt for reconsideration.						0.25		
12/6/24	Rev ALJ Direction re cmmts on Nov. 19 Ruling						0.25		
12/10/24	Rev PAO response ISO jt mt.						0.25		
12/11/24	Confer w J. Weberski re concerns on mt for reconsideration.						0.25		
2/5/25	Rev ALJ ruling vacating November ruling								0.25
5/28/25	Confer w J. Weberski re stlmt timing.								0.25
8/13/25	Rev PD.	0.15	0.1	0.1	0.1	0.1	0.2		
9/2/25	Rev parties' cmmts on PD.			0.5					
9/9/25	Rev parties' reply cmmts on PD.			0.25					
	Totals:	7.75	3.55	5.55	0.9	5.45	14.05	3.75	9.5
Compensation Related Hours									
5/31/23	Edits to NOI	0.25							
	Total:	0.25							

ATTACHMENT 3

Invoices of Maureen L. Reno



Invoice

Maureen L. Reno
Reno Energy Consulting Services, L.L.C.
EIN: 81-4397873

Date: December 1, 2023
Invoice # SBUA-2023-003
Project Number(s): SDG&E Rate Case
23-01-008

To: Britt K. Marra
Executive Director
Small Business Utility Advocates
548 Market Street, #11200
San Francisco, CA 94104
britt@utilityadvocates.org

Total Hours	Hours per Project	Description	Unit Price	Line Total
		Consulting services during the billing period November 1, 2023 to November 31, 2023.		
	13.25	Project No.SDG&E Rate Case 23-01-008: Work included the following: read company filing; attended calls with client; and drafted first set of discovery questions on company testimony regarding rate design.	\$370.00	\$4,902.50

Subtotal	\$4,902.50
Sales Tax	
Total	\$ 4,902.50

Make all checks payable to Reno Energy Consulting Services, L.L.C.
Thank you for your business!

19 Hope Hill, Rd., Derry, NH 03038 (603)391-6308 mreno@reno-energy.com



Invoice

Maureen L. Reno
Reno Energy Consulting Services, L.L.C.
EIN: 81-4397873

Date: January 1, 2024
Invoice # SBUA-2023-004
Project Number(s): SDG&E Rate Case
23-01-008

To: Britt K. Marra
Executive Director
Small Business Utility Advocates
548 Market Street, #11200
San Francisco, CA 94104
britt@utilityadvocates.org

Total Hours	Hours per Project	Description	Unit Price	Line Total
		Consulting services during the billing period December 1, 2023 to December 30, 2023.		
	46.25	Project No.SDG&E Rate Case 23-01-008: Work included the following: wrote discovery on Cal Advocates' filing; attended calls with client; conducted research on commission precedent, and wrote sections of testimony regarding cost allocation and rate design.	\$370.00	\$17,112.50

Subtotal	\$17,112.50
Sales Tax	
Total	\$ 17,112.50

Make all checks payable to Reno Energy Consulting Services, L.L.C.
Thank you for your business!

19 Hope Hill, Rd., Derry, NH 03038 (603)391-6308 mreno@reno-energy.com



Invoice

Maureen L. Reno
Reno Energy Consulting Services, L.L.C.
EIN: 81-4397873

Date: February 2, 2024
Invoice # SBUA-2024-001
Project Number(s): SDG&E Rate Case
23-01-008

To: Britt K. Marra
Executive Director
Small Business Utility Advocates
548 Market Street, #11200
San Francisco, CA 94104
britt@utilityadvocates.org

Total Hours	Hours per Project	Description	Unit Price	Line Total
		Consulting services during the billing period January 1, 2024 to January 31, 2024.		
	44.75	SDG&E Rate Case 23-01-008: Work included the following: conducted research and analysis: wrote testimony; and participated in settlement discussions with client, intervenors, and the Company.	\$385.00	\$17,228.75

Subtotal	\$17,228.75
Sales Tax	
Total	\$ 17,228.75

Make all checks payable to Reno Energy Consulting Services, L.L.C.
Thank you for your business!

19 Hope Hill, Rd., Derry, NH 03038 (603)391-6308 mreno@reno-energy.com



Invoice

Maureen L. Reno
Reno Energy Consulting Services, L.L.C.
EIN: 81-4397873

Date: March 1, 2024
Invoice # SBUA-2024-002
Project Number(s): SDG&E Rate Case 23-01-008

To: Britt K. Marra
Executive Director
Small Business Utility Advocates
548 Market Street, #11200
San Francisco, CA 94104
britt@utilityadvocates.org

Total Hours	Hours per Project	Description	Unit Price	Line Total
		Consulting services during the billing period February 1, 2024 to February 29, 2024.		
	21.00	SDG&E Rate Case 23-01-008: Work included the following: wconducted research and analysis: wrote testimony; and participated in settlement discussions with client, intervenors, and the Company..	\$385.00	\$8,085.00

Subtotal	\$8,085.00
Sales Tax	
Total	\$ 8,085.00

Make all checks payable to Reno Energy Consulting Services, L.L.C.
Thank you for your business!

19 Hope Hill, Rd., Derry, NH 03038 (603)391-6308 mreno@reno-energy.com



Invoice

Maureen L. Reno
Reno Energy Consulting Services, L.L.C.
EIN: 81-4397873

Date: April 1, 2024
Invoice # SBUA-2024-003
Project Number(s): SDG&E Rate Case 23-01-008

To: Britt K. Marra
Executive Director
Small Business Utility Advocates
548 Market Street, #11200
San Francisco, CA 94104
britt@utilityadvocates.org

Total Hours	Hours per Project	Description	Unit Price	Line Total
		Consulting services during the billing period March 1, 2024 to March 31, 2024.		
	5.25	SDG&E Rate Case 23-01-008: Work included the following: read and analyzed settlement proposals; provided settlement proposal to client; and participated in settlement discussions with client, intervenors, and the Company..	\$385.00	\$2,021.25

Subtotal	\$2,021.25
Sales Tax	
Total	\$ 2,021.25

Make all checks payable to Reno Energy Consulting Services, L.L.C.
Thank you for your business!

19 Hope Hill, Rd., Derry, NH 03038 (603)391-6308 mreno@reno-energy.com

ATTACHMENT 4

PUBLIC VERSION

Attorney-Client Agreement Between Small Business Utility Advocates and E&E Law Corp.
The contents of this attachment are confidential in their entirety.