



STATE OF CALIFORNIA

GAVIN NEWSOM, Governor

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

FILED

12/11/25

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December 11, 2025

Agenda ID #23914
Ratesetting

TO PARTIES OF RECORD IN APPLICATION 22-04-008 et al.:

This is the proposed decision of Administrative Law Judge Jonathan Lakey. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's January 15, 2026, Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties of record may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure.

The Commission may hold a Ratesetting Deliberative Meeting to consider this item in closed session in advance of the Business Meeting at which the item will be heard. In such event, notice of the Ratesetting Deliberative Meeting will appear in the Daily Calendar, which is posted on the Commission's website. If a Ratesetting Deliberative Meeting is scheduled, *ex parte* communications are prohibited pursuant to Rule 8.2(c)(4).

/s/ MICHELLE COOKE

Michelle Cooke
Chief Administrative Law Judge

MLC:hma
Attachment

Decision **PROPOSED DECISION OF ALJ LAKEY (Mailed 12/11/2025)**

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for Authority to Establish Its Authorized Cost of Capital for Utility Operations for 2023 and to Reset the Cost of Capital Adjustment Mechanism (U39M).

Application 22-04-008

And Related Matters.

Application 22-04-009

Application 22-04-011

Application 22-04-012

**DECISION GRANTING COMPENSATION TO WILD TREE FOUNDATION
FOR SUBSTANTIAL CONTRIBUTION TO DECISION 24-10-008**

Intervenor: Wild Tree Foundation	For contribution to Decision (D.) 24-10-008
Claimed: \$138,872.00	Awarded: \$89,935.20
Assigned Commissioner: Alice Reynolds	Assigned ALJ: Jonathan Lakey

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.24-10-008 (“Decision”) modified the cost of capital mechanism.
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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:	7/6/2022	Verified
2. Other specified date for NOI:	n/a	

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

	Intervenor	CPUC Verification
3. Date NOI filed:	8/4/2022	Verified
4. Was the NOI timely filed?		Yes
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:	D.24-03-062	Verified; <i>see</i> Part I.C[7].
6. Date of ALJ ruling:	3/21/2024	Verified
7. Based on another CPUC determination (specify):	n/a	
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	D.24-03-062	Verified; <i>see</i> Part I.C[7].
10. Date of ALJ ruling:	3/21/2024	Verified
11. Based on another CPUC determination (specify):	n/a	
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D. 24-10-008	Verified
14. Date of issuance of Final Order or Decision:	10/22/2024	Verified
15. File date of compensation request:	12/13/2024	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Intervenor’s Comment(s)	CPUC Discussion
7.	The Wild Tree Foundation (Wild Tree) is a non-profit, 501(c)(3) tax exempt corporation registered with the State of California that advocates for the protection of the environment, climate, and wildlife. Wild Tree is eligible for intervenor compensation based upon rebuttable presumption of eligibility pursuant	D.24-03-062 awarded compensation to Wild Tree in A.22-04-008. Per Rule 17.2 of the Commission’s Rules of Practice and Procedure “[a] party found eligible for an award of compensation in one phase of a proceeding remains eligible in later phases, including any rehearing, in the same proceeding.”

#	Intervenor's Comment(s)	CPUC Discussion
	<p>to D.24-03-062 and because it has previously met and continues to meet the Commission's long-standing definitions of eligibility. Wild Tree meets the definition of a Category 3 customer under the Public Utilities Code section 1802(b)(1)(C) as "representative of a group or organization authorized pursuant to its articles of incorporation or bylaws to represent the interests of residential customers..." Article 3, Section 3.3 of Wild Tree's Bylaws specifically authorizes the organization to represent the interests of residential ratepayers and seek intervenor compensation for doing so. A copy of Wild Tree's bylaws was submitted to the Commission with Wild Tree Foundation's Notice of Intent to Claim Intervenor Compensation in R.19-07-017 on September 9, 2019. Wild Tree's Bylaws have not been amended. Wild Tree represents the interests of residential ratepayers (100 percent) and not small commercial customers receiving bundled electric service from an electrical corporation. Wild Tree also qualifies as a Category 3 customer as an environmental group that represents residential customers with concerns for the environment. (See D.98-04-059, footnote at 30.) The Commission has explained that, "With respect to environmental groups, we have concluded they were eligible [for intervenor compensation] in the past with the understanding that they represent customers . . . who have a concern for the environment which distinguishes their interests from the interests represented by Commission</p>	

#	Intervenor's Comment(s)	CPUC Discussion
	<p>staff, for example.” (D.88-04-066.) Wild Tree is such an environmental group because it represents customers with a concern for the environment that is different from other interests in this proceeding.</p>	
11.	<p>Wild Tree is eligible for intervenor compensation based upon rebuttable presumption of eligibility pursuant to D.24-03-062 and because it has previously met and continues to meet the Commission's long-standing definitions of eligibility. Participation in this proceeding without intervenor compensation would pose a substantial financial hardship for Wild Tree because the economic interest of the residential ratepayers Wild Tree represents is small in comparison to the costs of Wild Tree's effective participation. (See Pub. Util. Code § 1802, subd. (h)).</p> <p>The total sum involved in this proceeding - up to \$744.9 million - is large, for any individual residential ratepayer that Wild Tree represents. The costs of participating individually thus would far outweigh the individual impacts of the outcome of this proceeding. Wild Tree has shown significant financial hardship and should be allowed to recover its costs in this proceeding.</p>	<p>D.24-03-062 does not grant Wild Tree eligibility for compensation upon rebuttable presumption for A.22-04-008. Per Rule 17.2 of the Commission's Rules of Practice and Procedure “[a] party found eligible for an award of compensation in one phase of a proceeding remains eligible in later phases, including any rehearing, in the same proceeding.”</p>

PART II: SUBSTANTIAL CONTRIBUTION**A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059):**

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>Wild Tree provided significant testimony and legal argument that the CCM should be modified. The Decision adopted Wild Tree and other parties' position that the CCM should be modified.</p> <p>Wild Tree Direct Testimony at pp. 3-7, 9-16. Wild Tree Reply Testimony at pp. 4-7. Wild Tree Opening Brief at pp. 3-5, 8-18 Wild Tree Reply Brief at pp. 1-3.</p>	<p>"The intervenors to this proceeding are generally in favor of modifying or eliminating the CCM." (Decision at p. 19.)</p> <p>"We are persuaded that modifications to the CCM are warranted." (Decision at p. 24.)</p> <p>"Relatedly, and as noted by many parties,⁵⁹ there is a structural asymmetry in the implementation of the CCM that favors shareholders. ⁵⁹ TURN Opening Brief at 9; EPUC/IS Opening Brief at 8; UCAN Opening Brief at 8; and Wild Tree Opening Brief at 4." (Decision at p. 24.)</p>	<p>Noted; <i>see</i> Part III.D CPUC Comments, Disallowances, and Adjustments [1].</p>
<p>Wild Tree provided testimony and legal argument on proposed modifications to the CCM that the Commission could consider in further review. Wild Tree also provided testimony and legal argument analyzing other party proposals and countering the utilities' argument that no modifications were needed.</p> <p>While the Decision did not provide a specific analysis for Wild Tree or other intervenors' proposals, it did ultimately adopt intervenor Cal Advocate's proposal for modification and rejected the utilities' arguments that no modifications were necessary.</p>	<p>The Decision discusses party proposals for modification and utilities' argument that no modification are needed at pp. 19-27, 29. The Decision adopts Cal Advocates' proposal for modification.</p>	<p>Noted; <i>see</i> Part III.D CPUC Comments, Disallowances, and Adjustments [1].</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>Wild Tree believes that its participation ensured a thorough analysis on the issue of modifications to the CCM and assisted in providing for a complete record on this issue. Wild Tree has thus made a substantial contribution to the issue.</p> <p>Wild Tree Direct Testimony at pp. 17-28. Wild Tree Reply Testimony at pp. 8-15. Wild Tree Opening Brief at pp. 18-28. Wild Tree Reply Brief at pp. 3-8.</p>		

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?	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: Wild Tree, TURN, UCAN, PCF, EPUC, EDF, and Cal Advocates shared the position that the CCM should be modified but did not share positions on the recommended process for modification or the recommended substance of modifications.		Noted
<p>d. Intervenor's claim of non-duplication: Efforts at coordination were curtailed by differences in the key positions of other intervenors.</p> <p>Among those parties with which Wild Tree shared the position that the CCM should be modified, each proposal varied widely. There was no other party whose views were aligned enough with Wild Tree that substantial</p>		Noted

	Intervenor's Assertion	CPUC Discussion
<p>coordination was possible. Intervenors that had been aligned in Phase 1 of this proceeding did meet and confer prior to filing of testimony to discuss positions and possible coordination but each party's proposal varied so widely that further coordination was not possible.</p> <p>Wild Tree did make an effort to avoid duplication of efforts by focusing its work on its areas of expertise and not attempting to address points well covered by other parties. For example, while Wild Tree provided significant testimony and argument on CCM modification but did not address blended return on equity or yield spread adjustment.</p>		

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
<p>a. Intervenor's claim of cost reasonableness:</p> <p>Wild Tree's request for intervenor compensation seeks an award of \$138,872.00 as the reasonable cost of participation in this proceeding. Wild Tree's request is reasonable given the number and complexity of issues. Wild Tree's costs are therefore reasonable in light of the amount of time, resources, and effort Wild Tree put into the proceeding as a party. Given the novelty of the issues presented, the quality of Wild Tree's work and the importance of the outcome, the Commission should be able to determine that Wild Tree's request is reasonable.</p> <p>Wild Tree's attorney fees are for a single attorney, April Maurath Sommer, who also acts as the Legal Director as an employee of Wild Tree. Wild Tree's expert fees are for two experts from Rothschild Financial Consultants, Aaron Rothschild and Edgar Bandera, that worked together to sponsor and defend testimony. The experts have contracted with Wild Tree to provide expert services on a contingency fee basis with the fees based upon the market rate determined by the Commission in its decision on this intervenor compensation claim. All expert fees that will be recovered as part of this claim are provided to the experts in fulfillment of the contingency fee contract.</p>	Noted

	CPUC Discussion															
<p>b. Reasonableness of hours claimed:</p> <p>Wild Tree seek compensation for a total of 185.8 hours of substantive work in this proceeding including 55.56 hours of attorney time and 157.24 hours of expert time. Wild Tree spent a reasonable and prudent amount of time on this matter, working diligently addressing highly complex and complicated issue in an efficient and expedient manner.</p> <p>A single in-house attorney, who is also Wild Tree Foundation’s Legal Director, experienced in practice before the Commission, drafted all filings for Wild Tree thereby leveraging many years of experience and expertise while limiting its attorney costs. Wild Tree’s experts are highly experienced in practice before the Commission and Wild Tree leveraged our experts’ many years of experience and expertise while limiting its expert costs.</p>	Noted															
<p>c. Allocation of hours by issue:</p> <table><tr><th>ISSUE</th><th>TIME (hrs)</th><th>%</th></tr><tr><td>General e.g. preparation and research, strategy and coordination, reviewing filed documents, meet and confer</td><td>7.98</td><td>4</td></tr><tr><td>Testimony preparation</td><td>174.45</td><td>82</td></tr><tr><td>Drafting and editing legal briefs</td><td>26.12</td><td>12</td></tr><tr><td>Comments on Proposed Decision</td><td>4.25</td><td>2</td></tr></table>	ISSUE	TIME (hrs)	%	General e.g. preparation and research, strategy and coordination, reviewing filed documents, meet and confer	7.98	4	Testimony preparation	174.45	82	Drafting and editing legal briefs	26.12	12	Comments on Proposed Decision	4.25	2	Noted; totals 100%. See Part III.D CPUC Comments, Disallowances, and Adjustments [2].
ISSUE	TIME (hrs)	%														
General e.g. preparation and research, strategy and coordination, reviewing filed documents, meet and confer	7.98	4														
Testimony preparation	174.45	82														
Drafting and editing legal briefs	26.12	12														
Comments on Proposed Decision	4.25	2														

B. Specific Claim: *

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
April Maurath Sommer	2024	55.56	\$650	See comment 1; D.24-03-062; Res. ALJ-393	\$36,114.00	38.90 [1]	\$585.00 [3]	\$22,756.50
Aaron Rothschild	2024	105.00	\$730	See comment 2; D.24-03-	\$76,650.00	73.50 [1]	\$710.00 [4,6]	\$52,185.00

CLAIMED						CPUC AWARD		
				062; Res. ALJ-393				
Edgar Bandera	2024	52.24	\$450	See comment 3; D.24-03- 062; Res. ALJ-393	\$23,508.00	36.57 [1]	\$410.00 [5,6]	\$14,993.70
Subtotal: \$136,272.00						Subtotal: \$89,935.20		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
April Maurath Sommer	2024	8	\$325	See comment 1 (½)2024 rate of \$650	\$2,600.00	0.00 [2]	\$292.50 [3]	\$0.00
Subtotal: \$2,600.00						Subtotal: \$0.00		
TOTAL REQUEST: \$138,872.00						TOTAL AWARD: \$89,935.20		
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors’ records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer’s normal hourly rate</p>								
ATTORNEY INFORMATION								
Attorney		Date Admitted to CA BAR ²		Member Number		Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation		
April Maurath Sommer		2008		257967		No		

C. Attachments Documenting Specific Claim and Comments on Part III³:

Attachment or Comment #	Description/Comment
Comment 1	2024 Fair Market Rate for Attorney April Maurath Sommer

² This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

³ Attachments not included in final Decision.

Attachment or Comment #	Description/Comment
	<p>\$650 is a fair market rate for 2024 for April Maurath Sommer based upon D.24-03-062, Resolution ALJ-393 and 16 years of experience as an attorney and 9 years of experience as a Legal Director.</p> <p>As documented in the attached bio and resume, in 2024 Maurath Sommer had 16 years of experience as an attorney, all of them specifically in work either before the Commission or directly relevant to work at the Commission in environmental, regulatory, and energy law. Maurath Sommer is not only exceptionally qualified as an attorney practicing before the Commission, but also has additional experience and responsibility as a legal director of two organizations with significant experience as intervenors before the Commission.</p> <p>Resolution ALJ-393's hourly rate chart states, for the attorney role, "higher experience levels should have experience with areas of law and procedures relevant to CPUC matters, such as environmental law or utility regulation." All of Maurath Sommer's years experience meets this requirement and, in addition, as of 2024, 11 years of her experience has been in practice before the Commission, and 9 years of her experience as an attorney has also been as a legal director for ratepayer advocate organizations.</p> <p>Pursuant to D.24-03-062 granting Wild Tree Foundation intervenor compensation Maurath Sommer's 2023 rate was determined to be \$565 based upon escalation of rate determination in 2021 (D.22-11-036). In 2021, Maurath Sommer's rate was determined based upon Resolution ALJ-393's hourly rate chart Attorney IV, 10-15 years.</p> <p>For 2024, Maurath Sommer's rate should be based upon Resolution ALJ-393's hourly rate chart Attorney V, 15+ years experience due to Maurath Sommer's additional years' experience.</p> <p>The range for Attorney V for 2024 is \$560.95 - \$773.67. Maurath Sommer's rate should also take into account the market rate for Legal Director III, 5-10 years. The range for Legal Director III for 2024 is \$461.99 - \$738.39.</p> <p>Given Maurath Sommer's 16 years relevant experience as an attorney, and 9 years relevant experience as a legal director, a fair market rate would be \$650. This rate is below the median of the Attorney V (\$680.95) and below the high end for Legal Director III (\$738.39).</p>
Comment 2	Fair Market Rate for Expert Aaron Rothschild

Attachment or Comment #	Description/Comment
	<p>\$730 is a fair market rate for 2024 for Aaron Rothschild based upon D.24-03-062, Resolution ALJ-393 and 24 years of experience. The Commission set Expert Aaron Rothschild's 2021 rate at \$630, and \$650 for 2022 in D.24-03-062 based upon the following findings:</p> <p>Based on the resume provided, Mr. Rothschild received his Master of Business Administration (MBA) in Finance from Vanderbilt University in 1996. He started at Rothschild Financial Consulting in November 2001 and filed his first testimony as an expert witness in March 2005 in the Northern States Power rate case before the North Dakota Public Service Commission. Rothschild's 20 years of experience includes 16 years - since 2005 - of sponsoring and defending expert witness testimony before state utility commissions in 86 different cases, including 4 years - since 2017 - of sponsoring and defending expert witness testimony before California's Commission in 25 different utility applications. With over 20 years of specialized experience working as an expert witness, as well as the utility regulatory authorities of 10 other states, and applicable experience in public policy and finance, we find the Public Policy Analyst, Level V, appropriate pursuant to Resolution ALJ-393. We find a 2021 hourly rate of \$630 reasonable given Mr. Rothschild years of experience and expertise.</p> <p>Given the rate of \$630 for 2021, we apply the 3.31% escalation factor for 2022 pursuant to Resolution ALJ-393. We approve a 2022 hourly rate of \$650, rounded to the nearest five dollars.</p> <p>$\\$630 \text{ (2021 rate)} * 1.0331 \text{ (2022 escalation factor)} = \\650.85, rounded to \$650 (rounded to the nearest five-dollar increment) (D.24-03-062 at p. 24.)</p> <p>In 2024, Mr. Rothschild has 24 years experience including 19 years - since 2005 - of sponsoring and defending expert witness testimony before state utility commissions in 104 different cases, including 7 years - since 2017 - of sponsoring and defending expert witness testimony before California's Commission in 31 different utility applications.</p> <p>Pursuant to Resolution ALJ-393 chart for 2024, a Public Policy Analyst, Level V, 15+ years experience range is \$572.11 - \$948.83. Applying the 2023 escalation factor (4.46%) and the 2024 escalation factor (4.07%) results in a rate of \$707.57 but Rothschild has gained significant experience since 2021 and should be, at the very least, in the median of the Public Policy Analyst, Level V, 15+ years category of \$731.01.</p>

Attachment or Comment #	Description/Comment
Comment 3	<p>Fair Market Rate for Expert Edgar Bandera</p> <p>\$450 is a fair market rate for 2024 for Edgar Bandera based upon D.24-03-062, Resolution ALJ-393 and 13 years of experience.</p> <p>The Commission set Expert Edgar Bandera's 2022 rate at \$380 in D.24-03-062 based upon the following findings:</p> <p style="padding-left: 40px;">Based on the resume provided and comments filed, we find Public Policy Analyst appropriate and ultimately adopt a rate of \$380. As of 2022, Mr. Bandera had 11 years' experience as a Public Policy Analyst/Economist testifying before the CPUC and on utility issues federally and in other states. According to the hourly rate chart implemented by Resolution ALJ 393, the rate range for Public Policy Analyst IV (10-15 years) is \$263-\$493. A rate near the median of the range is appropriate for Mr. Bandera. (D.24-03-062 at p. 26.)</p> <p>In 2024, Edgar Bandera has 13 experience as a Public Policy Analyst/Economist testifying before the CPUC and on utility issues federally and in other states. According to the hourly rate chart implemented by Resolution ALJ 393, the rate range for Public Policy Analyst IV (10-15 years) for 2024 is \$309.66 - \$539.92, median \$419.14.</p> <p>Applying the 2023 escalation factor (4.46%) and the 2024 escalation factor (4.07%) results in a rate of \$413.10. This is below the median and, given his additional years' experience, Banderas rate should be closer to the high end of the Public Policy Analyst IV (10-15 years). A 2024 rate of \$450 is between the median and high range and is a fair market rate.</p>
Attachment 1	Certificate of Service
Attachment 2	Timesheets of April Maurath Sommer, Edgar Bandera, Aaron Rothschild
Attachment 3	Bio and Resume of April Maurath Sommer

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Lack of Substantial Contribution	<p><u>Lack of Substantial Contribution (Wild Tree's Total: 63.83 hours):</u></p> <p>Public Utilities Code § 1802(j) states that a substantial contribution "has substantially assisted the commission in the making of its order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural</p>

Item	Reason
	<p>recommendations presented by the customer.” In our determination that Wild Tree made a contribution, we also evaluate whether the hours claimed were commensurate with the contributions made.</p> <p>The Administrative Law Judge’s 10/31/23 ruling outlining Phase 2 issues and schedule stated, “specific findings or orders that parties seek to have the Commission make related to these issues must be within the scope of this proceeding, and in this circumstance of proposed additional policy modifications for future Cost of Capital Applications, must lead to guidance that may be provided to the Applicants for future cost of capital cycles.” It also directed parties to “concisely state, in their opening testimony and opening briefs, any proposed ordering paragraphs that they seek the Commission to issue in the second phase of this proceeding.” Wild Tree did not do so, and its core recommendations were broadly focused beyond the proceeding.</p> <p>D.24-10-008 states, “Wild Tree argues that the Commission does not have sufficient information and has not provided an adequately robust process to be able to make an informed decision on changes to the CCM methodology in this phase of the present proceeding. Wild Tree recommends that the Commission make a determination in this proceeding that modifications to the CCM methodology and process are necessary and open a rulemaking to determine the CCM methodology and process. That is, Wild Tree recommends that no model for the CCM be adopted at this time.” Wild Tree focused its input on a recommendation beyond the scope of the proceeding, contrary to direction.</p> <p>Making a substantial contribution in and of itself does not entitle an intervenor to all its claimed fees and costs. Compensation is granted for efficient, meaningful contributions. Because Wild Tree’s efforts were not sufficiently contributory, we reduce 30% of hours from Wild Tree for this issue, as it appropriately acknowledges the value of Wild Tree’s contributions. The reduced hours are allocated as follows:</p> <p>Maurath Sommer (2024): 16.66 hrs. Rothschild (2024): 31.50 hrs. Bandera (2024): 15.67 hrs.</p>
[2] Maurath Sommer’s 2024 Intervenor Compensation (IComp) Claim	<p><u>IComp Claim Preparation (8.00 hours):</u> Maurath Sommer’s IComp claim preparation hours have been reduced by 8 hours, as time records do not account for these hours. To receive compensation for work performed, per the Intervenor Compensation Program Guide at 25, timesheets must include chronologically listed information detailing the date when the specific task was performed, the issue in the proceeding that the task addressed (including IComp), description of the task,</p>

Item	Reason
Preparation Disallowance	and amount of the time spent on the task. These requirements apply to IComp preparation hours as well.
[3] Maurath Sommer's 2024 Hourly Rate	D.25-01-047 approved a 2024 hourly rate of \$585.00 for Maurath Sommer.
[4] Rothschild's 2024 Hourly Rate	<p>Wild Tree has confirmed that Rothschild is a consultant. Pursuant to Commission policy, the rate requested by an intervenor must not exceed the rate billed to that intervenor by any outside consultant it hires, even if the consultant's billed rate is below the floor for a given experience level⁴. Per the IComp Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§ 1804(d)).</p> <p>Wild Tree confirmed that per the terms of their contract, Rothschild has been hired on a contingency rate basis, meaning that Rothschild has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on Rothschild experience as a Public Policy Analyst V. Given that the 2024 rate range for Public Analyst V is \$572.11 to \$948.83, we find the requested 2024 hourly rate of \$730.00 to be excessive based on Rothschild's experience. We determine that an hourly rate of \$710.00 is more reasonable, and approve it here.</p> <p>The award determined herein for Rothschild's contribution in this proceeding shall be paid in full to Rothschild, and no portion of this part of the award shall be kept by Wild Tree. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission's policy on consultant compensation, and the understanding that the consultant has not billed or collected compensation for the work performed until the final award is given.</p> <p>We reiterate that it is the responsibility of the intervenor to be forthcoming about engaging consultants and the terms of the contract, to adhere to the Commission's policy on compensation for consultant fees, and to provide the appropriate documentation with the initial claim to ensure efficient processing, and thus avoid the need for the Commission to request supplemental documentation. In this instance, Wild Tree did not provide all the documentation pertaining to the contract terms between Intervenor and</p>

⁴ D.07-01-009, D.08-04-010, and Resolution ALJ-235.

Item	Reason
	Consultant in the initial claim and waited until the Commission requested supplemental documentation which delays the processing of the claim.
[5] Bandera's 2024 Hourly Rate	<p>Wild Tree has confirmed that Bandera is a consultant. Pursuant to Commission policy, the rate requested by an intervenor must not exceed the rate billed to that intervenor by any outside consultant it hires, even if the consultant's billed rate is below the floor for a given experience level⁴. Per the IComp Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§ 1804(d)).</p> <p>Wild Tree confirmed that per the terms of their contract, Bandera has been hired on a contingency rate basis, meaning that Bandera has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on Bandera experience as a Public Policy Analyst IV. Given that the 2024 rate range for Public Policy Analyst IV is \$309.66 to \$539.92, we find the requested 2024 hourly rate of \$450.00 to be excessive based on Bandera's experience. We determine that an hourly rate of \$410.00 is more reasonable and approve it here.</p> <p>The award determined herein for Bandera's contribution in this proceeding shall be paid in full to Bandera, and no portion of this part of the award shall be kept by Wild Tree. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission's policy on consultant compensation, and the understanding that the consultant has not billed or collected compensation for the work performed until the final award is given.</p> <p>We reiterate that it is the responsibility of the intervenor to be forthcoming about engaging consultants and the terms of the contract, to adhere to the Commission's policy on compensation for consultant fees, and to provide the appropriate documentation with the initial claim to ensure efficient processing and thus avoid the need for the Commission to request supplemental documentation. In this instance, Wild Tree did not provide all the documentation pertaining to the contract terms between Intervenor and Consultant in the initial claim and waited until the Commission requested supplemental documentation which delays the processing of the claim.</p>
[6] Intervenor Responsibility for Transparency and Accuracy in	The Commission takes this opportunity to remind all intervenors that they bear the burden of providing accurate, complete, and honest information in all compensation requests. The Commission relies on intervenors' good faith representations, particularly regarding consultant agreements and payments, as it does not have the resources to review every contract or non-standard arrangement in detail.

Item	Reason
Compensation Requests	<p>Intervenor compensation is funded by ratepayers, and the Commission takes seriously any effort to mislead or obscure the financial basis for a claim. Although no violation of Rule 1.1 has been found in this instance, we remind intervenors that under Rule 1.1, intent to deceive is not required for a violation, misstatements may still be actionable. Dishonest or misleading claims not only risk denial of compensation but may also subject the intervenor to penalties.</p> <p>The Commission has clear authority to audit intervenors' books and records to verify the basis for any award. Intervenors must therefore ensure full transparency regarding actual time spent on issues, consultant fees, payment arrangements, and the actual disbursement of funds. Failure to meet this obligation undermines the integrity of the compensation process and may lead to denial of claims or further enforcement action.</p>

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?	No
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B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	No
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If not:

Party	Comment	CPUC Discussion

FINDINGS OF FACT

1. Wild Tree Foundation has made a substantial contribution to D.24-10-008.
2. The requested hourly rates for Wild Tree Foundation's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services, and/or reflect the actual rates billed to, and paid by the intervenor, for consultant services rendered.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.

4. The total of reasonable compensation is \$89,935.20.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. Wild Tree Foundation is awarded \$89,935.20.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company, and San Diego Gas & Electric Company shall pay Wild Tree Foundation their respective shares of the award, based on their California-jurisdictional gas and electric revenues for the 2024 calendar year, to reflect the year in which the proceeding was primarily litigated. If such data are unavailable, the most recent gas and 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 February 26, 2025, the 75th day after the filing of Wild Tree Foundation's request, and continuing until full payment is made.
3. The comment period for today's decision is not waived.
4. Application (A.) 22-04-008, A.22-04-009, A.22-04-11, and A.22-04-012 are closed.

This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D2410008		
Proceeding(s):	A2204008		
Author:	Judge Lakey		
Payer(s):	Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company, and San Diego Gas & Electric Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Wild Tree Foundation	12/13/2024	\$138,872.00	\$89,935.20	N/A	See Part III.D CPUC Comments, Disallowances, and Adjustments above.

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
April	Maurath Sommer	Attorney ⁵	\$650	2024	\$585.00
Aaron	Rothschild	Expert ⁶	\$730	2024	\$710.00
Edgar	Bandera	Expert ⁷	\$450	2024	\$410.00

(END OF APPENDIX)

⁵ Maurath Sommer is classified as a Legal Director III.

⁶ Rothschild serves Wild Tree as a consultant.

⁷ Bandera serves Wild Tree as a consultant.