



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

FILED

Order Instituting Rulemaking To Improve the California Climate Credit.	12/19/25 Rulemaking 25-07-01303:11 PM R250701B
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**NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION
AND, IF REQUESTED (and [X]¹ checked), ADMINISTRATIVE LAW JUDGE'S
RULING ON SMALL BUSINESS UTILITY ADVOCATES' SHOWING OF
SIGNIFICANT FINANCIAL HARDSHIP**

Customer or Eligible Local Government Entity (party intending to claim intervenor compensation): Small Business Utility Advocates ("SBUA")	
Assigned Commissioner: Alice Reynolds	Administrative Law Judge: Maria Sotero
I hereby certify that the information I have set forth in Parts I, II, III and IV of this Notice of Intent is true to my best knowledge, information and belief.	
Signature: /s/ Britt Marra	
Date: December 19, 2025	Printed Name: Britt K. Marra

PART I: PROCEDURAL ISSUES
(To be completed by the party intending to claim intervenor compensation)

A. Status as "customer" (see Pub. Util. Code § 1802(b))² The party claims "customer" status because the party is (check one):	Applies (check)
1. A Category 1 customer is an actual customer whose self-interest in the proceeding arises primarily from his/her role as a customer of the utility and, at the same time, the customer must represent the broader interests of at least some other customers. See, for example, D.08-07-019 at 5-10).	<input type="checkbox"/>
2. A Category 2 customer is a representative who has been authorized by actual customers to represent them. Category 2 involves a more formal arrangement where a customer or a group of customers selects a more skilled person to represent the customer's views in a proceeding. A customer or group of customers may also form or authorize a group to represent them, and the	<input type="checkbox"/>

¹ DO NOT CHECK THIS BOX if a finding of significant financial hardship is not needed (in cases where there is a valid rebuttable presumption of eligibility (Part III(A)(3)) or significant financial hardship showing has been deferred to the intervenor compensation claim).

² All statutory references are to California Public Utilities Code unless indicated otherwise.

<p>group, in turn, may authorize a representative such as an attorney to represent the group.</p>	
<p>3. A Category 3 customer is a formally organized group authorized, by its articles of incorporation or bylaws to represent the interests of residential customers or small commercial customers receiving bundled electric service from an electrical corporation (§1802(b)(1)(C)). Certain environmental groups that represent residential customers with concerns for the environment may also qualify as Category 3 customers, even if the above requirement is not specifically met in the articles or bylaws. <i>See</i> D.98-04-059, footnote at 30.</p>	<p style="text-align: center;">☒</p>
<p>4. The party’s detailed explanation of the selected customer category.</p> <p><u>The party’s explanation of its status as a Category 1 customer.</u> A party seeking status as a Category 1 customer must describe the party’s own interest in the proceeding and show how the customer’s participation goes beyond just his/her own self-interest and will benefit other customers. Supporting documents must include a copy of the utility’s bill.</p> <p><u>The party’s explanation of its status as a Category 2 customer.</u> A party seeking status as a Category 2 customer must identify the residential customer(s) being represented and provide authorization from at least one customer.</p> <p><u>The party’s explanation of its status as a Category 3 customer.</u> If the party represents residential and small commercial customers receiving bundled electric service from an electrical corporation, it must include in the Notice of Intent either the percentage of group members that are residential ratepayers or the percentage of the members who are receiving bundled electric service from an electrical corporation. Supporting documentation for this customer category must include current copies of the articles of incorporation or bylaws. If current copies of the articles and bylaws have already been filed with the Commission, only a specific reference (the proceeding’s docket number and the date of filing) to such filings needs to be made.</p> <p>Small Business Utility Advocates (“SBUA”) is a California 501(c)(3) corporation that represents the interests of small businesses in California (and nationwide). SBUA’s mission and purpose are set forth in its Articles of Incorporation. “<i>The specific purpose of this corporation</i>” includes to “<i>represent, protect, and promote the interests of small businesses</i>” in their capacity “<i>as public utility customers of bundled electric, natural gas, water, and telecommunications services.</i>” SBUA Articles of Incorporation, Art. II (b). Current SBUA Articles of Incorporation and Bylaws are on file with the Commission. <i>See</i> SBUA Notice of Intent to Claim Intervenor Compensation in Application 16-09-003, filed January 6, 2017, amended with bylaws, filed January 23, 2017. These articles and bylaws</p>	

<p>remain current, and pursuant to Commission Rule 17.1(d), SBUA has not attached another copy of SBUA's Articles with the Notice in this proceeding.</p> <p>Consistent with its governing mission, SBUA seeks members in California that are small commercial customers receiving bundled utility services and represents them as a community to protect their utility and energy-related concerns. SBUA has a few members that are themselves nonprofit organizations that represent small businesses but estimates that 97% or more of its California members are small commercial customers. SBUA's priorities include promoting reliable, cost-effective, and equitable utility services that support the success of small businesses. And small business ratepayers are an important stakeholder group in the Commission's consideration of the California Climate Credit.</p> <p>SBUA has been granted Category 3 customer status and intervenor compensation for contributions in numerous cases before the California Public Utilities Commission, including in R.22-02-005, A.19-07-006, R.19-01-11, A.18-11-005, R.18-07-003, A.18-01-012, A.17-09-006, A.17-06-031, A.17-02-008, A.17-01-020, A.16-09-001, A.16-06-013, A.15-09-001, A.13-02-011, and A.12-11-009.</p>	
<p>Do you have any direct economic interest in outcomes of the proceeding?³</p> <p>If "Yes", explain:</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B. Conflict of Interest (§ 1802.3)	Check

1. Is the customer a representative of a group representing the interests of small commercial customers who receive bundled electric service from an electrical corporation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2. If the answer to the above question is "Yes", does the customer have a conflict arising from prior representation before the Commission?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C. Status as an Eligible Local Government Entity (§§1802(d), 1802.4, 1803.1)	
<p>The party claims "eligible local government entity" status because the party is a city, county, or city and county that is not a publicly owned public utility that intervenes or participates in a Commission proceeding for the purpose of protecting the health and safety of the residents within the entity's jurisdiction following a catastrophic material loss suffered by its residents either in significant damage to infrastructure or loss of life and property, or both, as a direct result of public utility infrastructure.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p><u>The party's explanation of its status as an eligible local government entity must include a description of</u></p> <p>(1) The relevant triggering catastrophic event;</p>	

³ See Rule 17.1(e).

<p>(2) The impacts of the triggering catastrophic event on the residents within the entity's jurisdiction as a result of public utility infrastructure; and</p> <p>(3) The entity's reason(s) to participate in this proceeding.</p>	
<p>D. Timely Filing of Notice of Intent to Claim Intervenor Compensation (NOI) (§ 1804(a)(1)):</p>	
<p>1. Is the party's NOI filed within 30 days after a Prehearing Conference? Date of Prehearing Conference: November 21, 2025</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>2. Is the party's NOI filed at another time (for example, because no Prehearing Conference was held, the proceeding will take less than 30 days, the schedule did not reasonably allow parties to identify issues within the timeframe normally permitted, or new issues have emerged)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>2a. The party's description of the reasons for filing its NOI at this other time:</p>	
<p>2b. The party's information on the proceeding number, date, and decision number for any Commission decision, Commissioner ruling, Administrative Law Judge's ruling, or other document authorizing the filing of NOI at that other time:</p>	

PART II: SCOPE OF ANTICIPATED PARTICIPATION
(To be completed by the party intending to claim intervenor compensation)

<p>A. Planned Participation (§ 1804(a)(2)(A)):</p>
<p>The party's statement of the issues on which it plans to participate:</p> <p>SBUA intends to focus on the following issues in this proceeding:</p> <p>(1) Eligibility and allocation decisions affecting small businesses, including whether and how Climate Credit eligibility and allocation should change across customer classes (including small commercial customers).</p> <p>(2) Implementation details, including timing, bill impacts, and transparency.</p> <p>(3) Outreach and customer communications needed to make Climate Credit benefits accessible to small businesses.</p> <p>(4) Any revisions to guiding principles for the program, including ensuring those principles appropriately account for small business customers.</p> <p>Because the Scoping Memo has not yet been issued, SBUA may refine the focus of its participation based on the final scope adopted by the Commission.</p> <p>The party's explanation of how it plans to avoid duplication of effort with other parties:</p>

SBUA will focus on issues relevant to the small business class and engage with other stakeholders on common issues to avoid duplication.

The party's description of the nature and extent of the party's planned participation in this proceeding (to the extent that it is possible to describe on the date this NOI is filed).

SBUA has already participated with comments on the Rulemaking and attending the PHC. Moving forward, SBUA's participation may include, for example, attending workshops, submitting comments on staff proposals, and commenting on any proposed decisions, as needed to ensure the interests of small business ratepayers are considered.

B. The party's itemized estimate of the compensation that the party expects to request, based on the anticipated duration of the proceeding (§ 1804(a)(2)(A)):

Item	Hours	Rate \$	Total \$	#
ATTORNEY, EXPERT, AND ADVOCATE FEES				
Luke May	85	\$495	\$42,075	
Matt Sheriff	45	\$430	\$19,350	
James Birkelund	20	\$830	\$16,600	
Subtotal: \$78,025				
OTHER FEES				
Subtotal: \$0				
COSTS				
Subtotal: \$0				
TOTAL ESTIMATE: \$78,025				

Estimated Budget by Issues:

SBUA estimates its time to be spent on issues as follows:

1. Climate Credit eligibility and allocation for small business customers – 35%.
2. Implementation, including timing, bill impacts, and transparency – 30%.
3. Outreach and customer communications for small businesses – 20%.
4. Guiding principles as they relate to small business customers – 15%.

Estimates of attorney and expert witness time and hourly rates are preliminary and will depend on how the case progresses. The reasonableness of the hourly rates for SBUA's representatives will be addressed in our Request for Compensation. SBUA is basing intervenor compensation rates by years of experience (Resolution ALJ-393) and based on Commission awards of intervenor compensation in recent decisions.

When entering items, type over bracketed text; add additional rows to table as necessary. Estimate may (but does not need to) include estimated Claim preparation time. Claim preparation time is typically compensated at ½ professional hourly rate.

PART III: SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP
(To be completed by party intending to claim intervenor compensation;
see Instructions for options for providing this information)

A. The party claims that participation or intervention in this proceeding without an award of fees or costs imposes a significant financial hardship, on the following basis:	Applies (check)
1. The customer cannot afford, without undue hardship, to pay the costs of effective participation, including advocate's fees, expert witness fees, and other reasonable costs of participation. (§ 1802(h))	<input type="checkbox"/>
2. In the case of a group or organization, the economic interest of the Individual members of the group or organization is small in comparison to the costs of effective participation in the proceeding. (§ 1802(h))	<input checked="" type="checkbox"/>
3. The eligible local government entities' participation or intervention without an award of fees or costs imposes a significant financial hardship. (§ 1803.1(b).)	<input type="checkbox"/>
4. A § 1802(h) or § 1803.1(b) finding of significant financial hardship in another proceeding, made within one year prior to the commencement of this proceeding, created a rebuttable presumption in this proceeding (§ 1804(b)(1)).	<input type="checkbox"/>
Commission's finding of significant financial hardship made in proceeding number:	
Date of Administrative Law Judge's Ruling (or CPUC Decision) in which the finding of significant financial hardship was made:	

B. The party's explanation of the factual basis for its claim of "significant financial hardship" (§ 1802(h) or § 1803.1(b)) (necessary documentation, if warranted, is attached to the NOI:
At the time of this filing, SBUA is waiting for a ruling on its showing of significant financial hardship with its NOI filed in A.25-06-017 on August 8, 2025. Pending a favorable ruling in that proceeding, the same showing of significant hardship will apply here. For purposes of this NOI, SBUA refers to the financial hardship showings presented in A.25-06-017.

PART IV: ATTACHMENTS DOCUMENTING SPECIFIC
ASSERTIONS MADE IN THIS NOTICE

**(The party intending to claim intervenor compensation identifies and attaches documents;
add rows as necessary)**

Attachment No.	Description
1	Certificate of Service

ADMINISTRATIVE LAW JUDGE RULING⁴
(Administrative Law Judge completes)

	Check all that apply
1. The Notice of Intent (NOI) is rejected for the following reasons:	<input type="checkbox"/>
a. The NOI has not demonstrated the party's status as a "customer" or an "eligible local government entity" for the following reason(s):	<input type="checkbox"/>
b. The NOI has not demonstrated that the NOI was timely filed (Part I(B)) for the following reason(s):	<input type="checkbox"/>
c. The NOI has not adequately described the scope of anticipated participation (Part II, above) for the following reason(s):	<input type="checkbox"/>
2. The NOI has demonstrated significant financial hardship for the reasons set forth in Part III of the NOI (above).	<input type="checkbox"/>
3. The NOI has not demonstrated significant financial hardship for the following reason(s):	<input type="checkbox"/>
4. The Administrative Law Judge provides the following additional guidance (see § 1804(b)(2)):	<input type="checkbox"/>

IT IS RULED that:

1. The Notice of Intent is rejected.	<input type="checkbox"/>
2. The customer or eligible local government entity has satisfied the eligibility requirements of Pub. Util. Code § 1804(a).	<input type="checkbox"/>
3. The customer or eligible local government entity has shown significant financial hardship.	<input type="checkbox"/>

⁴ A Ruling needs not be issued unless: (a) the NOI is deficient; (b) the Administrative Law Judge desires to address specific issues raised by the NOI (to point out similar positions, areas of potential duplication in showings, unrealistic expectations for compensation, or other matters that may affect the customer or eligible local government entity's Intervenor Compensation Claim); or (c) the NOI has included a claim of "significant financial hardship" that requires a finding under § 1802(h).

4. The customer or eligible local government entity is preliminarily determined to be eligible for intervenor compensation in this proceeding. However, a finding of significant financial hardship in no way ensures compensation.	<input type="checkbox"/>
5. Additional guidance is provided to the customer or eligible local government entity as set forth above.	<input type="checkbox"/>

Dated _____, at San Francisco, California.

Administrative Law Judge