



FORM A: BLANK NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION

FILED

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

02:45 PM

Order Instituting Rulemaking to Improve the California Climate Credit	R.25-07-013 (Filed July 24, 2025)	R2507013
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**NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION
AND, IF REQUESTED (and [X]¹ checked), ADMINISTRATIVE LAW JUDGE'S
RULING ON [Leadership Counsel for Justice and Accountability]'S SHOWING OF
SIGNIFICANT FINANCIAL HARDSHIP**

NOTE: AFTER ELECTRONICALLY FILING A PDF COPY OF THIS NOTICE OF INTENT, PLEASE EMAIL THE DOCUMENT IN AN MS WORD FORMAT TO THE INTERVENOR COMPENSATION PROGRAM COORDINATOR AT lcompcoordinator@cpuc.ca.gov.

Customer or Eligible Local Government Entity (party intending to claim intervenor compensation): Leadership Counsel for Justice and Accountability		
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/ Michael Claiborne
Date: December 19, 2025	Printed Name:	Michael Claiborne

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"/>

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>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 group, in turn, may authorize a representative such as an attorney to represent the group.</p>	<input type="checkbox"/>
<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>	<input checked="" type="checkbox"/>
<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>Leadership Counsel is a Category 3 customer by virtue of its status as a formally organized group authorized by its articles of incorporation or bylaws to represent the interests of residential customers. (Bylaws on file in R.15-03-010.) It is a nonprofit organization that partners with and/or legally represents community-based organizations (CBOs) in disadvantaged communities in pursuit of environmental justice and equitable community development. Its mission is to mobilize community</p>	

voice, advocate for sound policy, and eradicate injustice to promote equal access to opportunity regardless of wealth, race, income, and place.

Leadership Counsel is not a membership organization. However, the members of its partner-CBOs are exclusively residential ratepayers in low-income communities. Approximately 90 percent of its clients and partners reside within the San Joaquin Valley, while the remaining reside within the East Coachella Valley. Leadership Counsel represents customers and potential customers whose interests include the concerns that policies or programs do not disproportionately and negatively impact low-income, disadvantaged communities; that such communities receive just and equitable benefits from new regulations, policies, or programs; and that the program at issue in this proceeding improves environmental quality locally, regionally, and globally.

The CBOs that we provide legal representation to include, but are not limited to: Familias Addams por un Mejor Futuro (Fresno County), Concerned Citizens of West Fresno (Fresno County), Matheny Tract Committee (Tulare County), Tooleville Mutual Nonprofit Water Association (Tulare County), Pixley Residents for Environmental Justice (Tulare County), the Committee of Sunbird Residents (Riverside County), Lanare Community Services District (Fresno County), Community United in Lanare (Fresno County), Orange Cove United (Fresno County), Fairmead Community and Friends (Madera County), la Asociación de Gente Unida por el Agua (San Joaquin Valley), Protectores del Agua Subterránea (San Joaquin Valley), Defensores del Valle Central para el Aire y Agua Limpio (San Joaquin Valley), Semillas de la Resistencia (Eastern Coachella Valley), and Juntos por un Mejor Oasis (Eastern Coachella Valley). Leadership Counsel's non-client partners include, but are not limited to, the following CBOs: Lideres Campesinas (Merced County, Madera County, Riverside County), Comite Progreso de Lamont (Kern County), Committee for a Better Arvin (Kern County), and Greenfield Walking Group (Kern County).

Leadership Counsel is a category three customer for at least two reasons. First, as held in R.15-03-010, our "legal representation activities align it with a public interest law firm that we found eligible in D.88-05-028. [and as such,] Leadership Counsel has demonstrated it is a §1802(b)(1)(C) customer." (ALJ Ruling, October 18, 2016.)

Second, Leadership Counsel is an eligible environmental group as described in D.98- 04-059, p. 30 n.14: "With respect to environmental groups, we have concluded they were eligible in the past with the understanding that they represent customers whose environmental interests include the concern that, e.g., regulatory policies encourage the adoption of all cost-effective conservation measures and discourage unnecessary new generating resources that are expensive and environmentally damaging... They represent customers who have a concern for the environment which distinguishes their interests from the interests represented by Commission staff, for example."

Leadership Counsel does not derive any income from attorneys' fees paid by its clients. Additionally, while it has received attorney's fee awards in civil litigation and intervenor's compensation, that does not disqualify it as an environmental group or a public interest law firm. (See D.88-05-028, 1988 Cal. PUC LEXIS 460, ["Revenue Ruling 75-76 clarifies that the acceptance of fee awards from a court (or administrative agency such as this Commission) is not necessarily inconsistent with the basis of the IRC charitable exemption of public interest law firms."].)	
Do you have any direct economic interest in outcomes of the proceeding? ³ If "Yes", explain:	<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 type="checkbox"/> Yes <input checked="" 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 type="checkbox"/> No
C. Status as an Eligible Local Government Entity (§§1802(d), 1802.4, 1803.1)	
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.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<u>The party's explanation of its status as an eligible local government entity must include a description of</u> (1) The relevant triggering catastrophic event; (2) The impacts of the triggering catastrophic event on the residents within the entity's jurisdiction as a result of public utility infrastructure; and (3) The entity's reason(s) to participate in this proceeding.	
D. Timely Filing of Notice of Intent to Claim Intervenor Compensation (NOI) (§ 1804(a)(1)):	
1. Is the party's NOI filed within 30 days after a Prehearing Conference? Date of Prehearing Conference: 11/21/2025	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

³ See Rule 17.1(f).

2a. The party's description of the reasons for filing its NOI at this other time: N/A
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: N/A

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

A. Planned Participation (§ 1804(a)(2)(A)):				
The party's statement of the issues on which it plans to participate:				
<p>Leadership Counsel intends to participate in all aspects of this proceeding, and to provide relevant factual and legal information regarding the needs, experiences and perspectives of residents of low-income communities, disadvantaged communities and communities of color in the San Joaquin and Coachella Valleys. In particular, Leadership Counsel will conduct outreach in, and advocate on behalf of, disadvantaged communities to ensure that residents who we work with have the opportunity to inform strategies to improve the Climate Credit.</p>				
The party's explanation of how it plans to avoid duplication of effort with other parties:				
<p>Leadership Counsel will coordinate with other parties to avoid duplication and, where appropriate, will utilize joint comments and resolve issues ahead of hearings and submissions. Leadership Counsel is a partner organization of the California Environmental Justice Alliance (CEJA), which is a party to this action. Leadership Counsel also often works closely with Central California Environmental Justice Network (CCEJN), which is a party to this action. Leadership Counsel intends to, and already has, coordinated with CEJA and CCEJN to file joint comments, where appropriate, particularly on issues of statewide concern, and will advocate separately where appropriate on issues that are more acutely felt in the San Joaquin Valley and Eastern Coachella Valley. While the interests of CEJA, CCEJN, and Leadership Counsel are likely to be aligned on many issues in this proceeding, Leadership Counsel works with many communities that are unique and distinct with respect to geography and other characteristics.</p>				
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).				
As noted above, Leadership Counsel intends to participate in all aspects of this proceeding, with an estimated budget and allocation by issue included below.				
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				
Michael Claiborne	40	707.20	\$28,288	
Jamie Zweifler-Katz	80	622.90	\$49,832	

Mariela Loera	20	330.43	\$6,608.60	
Mariana Alvarenga	20	330.43	\$6,608.60	
Subtotal: \$91,337.20				
OTHER FEES				
[Person 1]				
[Person 2]				
Subtotal: \$0				
COSTS				
[Item 1]				
[Item 2]				
Subtotal: \$0				
TOTAL ESTIMATE: \$91,337.20				
Estimated Budget by Issues:				
<p>Leadership Counsel preliminarily estimates that its participation will be allocated as follows:</p> <ul style="list-style-type: none"> • Inform outreach and engagement generally: 10% • Outreach and engagement of disadvantaged communities: 30% • Inform Climate Credit policies related to disadvantaged communities and low-income household in the San Joaquin and East Coachella Valleys: 40% • Inform and evaluate policies with respect to the Climate Credit generally: 20% 				
<p><i>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.</i></p>				

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"/>

<p>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)).</p> <p>Commission’s finding of significant financial hardship made in proceeding number:</p> <p>Date of Administrative Law Judge’s Ruling (or CPUC Decision) in which the finding of significant financial hardship was made:</p>	<input type="checkbox"/>
<p>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:</p> <p>Leadership Counsel is a nonprofit organization that works with, and/or legally represents, community-based organizations (CBOs) in disadvantaged communities throughout the San Joaquin and East Coachella Valleys (see Part I(A) above). Although Leadership Counsel is not a member organization, the members of its partner-CBOs are exclusively residential ratepayers in low-income communities. Thus, the cost of Leadership Counsel’s effective participation in this proceeding substantially outweighs the anticipated financial benefit to any individual person it represents. (<i>See</i> Pub. Util. Code § 1802(g).)</p> <p>A preliminary finding of significant financial hardship was made in Rulemaking 15-03-010 on October 18, 2016, which required for a final determination that Leadership Counsel include on its compensation claim(s) a statement regarding whether it derives any income from attorney’s fees. On Leadership Counsel’s October 5, 2017 request for compensation in that proceeding, it noted that it does not in fact receive any income from attorney’s fees. In Decision 18-01-019 in that proceeding, issued on January 11, 2018, the Commission granted Leadership Counsel’s request for intervenor compensation and noted that it had “complied with item 3 wherein Administrative Law Judge Tsen provided additional guidance to include in a §1804(c) compensation claim a statement on whether the intervenor derives any income from attorney fees.”</p> <p>Then, in Decision 23-11-028, issued November 7, 2023, Administrative Law Judge Watts-Zagha ruled that Leadership Counsel demonstrated significant financial hardship.</p> <p>Leadership Counsel has not received any funding to support its participation in this proceeding, except that it received an award from the Commission’s Equity and Access (E&A) Grant Program to support retention of experts to aid Leadership Counsel’s engagement in Commission proceedings. The E&A award is solely for retention of experts and does not fund Leadership Counsel’s staff time or costs for engagement in this proceeding. Leadership Counsel will ensure that it does not claim compensation for any expert time or costs that is otherwise funded by the E&A Grant Program.</p>	

**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"/>
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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).

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. 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