



STATE OF CALIFORNIA

GAVIN NEWSOM, Governor

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

**FILED**

01/23/26  
01:28 PM  
R1909009

January 23, 2026

**Agenda ID # 23996**  
**Ratesetting**

TO PARTIES OF RECORD IN RULEMAKING 19-09-009:

This is the proposed decision of Administrative Law Judge Debbie Chiv. 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 February 26, 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 to the proceeding may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure. Electronic copies of comments should also be sent to the Intervenor Compensation Program at [icompcoordinator@cpuc.ca.gov](mailto:icompcoordinator@cpuc.ca.gov).

/s/ MICHELLE COOKE

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Michelle Cooke  
Chief Administrative Law Judge

MLC:abb  
Attachment

Decision **PROPOSED DECISION OF ALJ CHIV (Mailed 1/23/2026)****BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding Microgrids Pursuant to Senate Bill 1339 and Resiliency Strategies.	Rulemaking 19-09-009 (Filed September 12, 2019)
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**DECISION GRANTING COMPENSATION TO SMALL BUSINESS  
UTILITY ADVOCATES FOR SUBSTANTIAL CONTRIBUTION  
TO DECISION (D.) 21-07-011, D.21-12-004 AND D.24-11-004**

<b>Intervenor:</b> Small Business Utility Advocates (SBUA)	<b>For contribution to Decision (D.) D.21-07-011, D.21-12-004, D.24-11-004 (rehearing of which was denied in D.25-06-067)</b>
Claimed: \$142,522.75	Awarded: \$64,325.95
<b>Assigned Commissioner:</b> Alice Reynolds	<b>Assigned ALJ:</b> Debbie Chiv

**PART I: PROCEDURAL ISSUES**

<b>A. Brief description of Decision:</b>	D.21-07-011 (Track 3) directed Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and Southern California Edison Company (SCE) to provide rate schedule(s) that suspend the capacity reservation component of their standby charge for eligible microgrids that meet the California Air Resources Board air pollution standards for generation.  D.21-12-004 (Track 4) adopted enhanced summer 2022 and summer 2023 requirements for PG&E and SDG&E.  D.24-11-004 (Track 5/Final Decision) adopts a ratepayer oriented multi-property microgrid tariff for PG&E, SCE, and SDG&E.
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812<sup>1</sup>:**

	Intervenor	CPUC Verification
<b>Timely filing of notice of intent to claim compensation (NOI) (§1804(a)):</b>		
1. Date of Prehearing Conference:	December 17, 2019	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	January 6, 2020	Verified. Amended NOI filed on 9/16/21
4. Was the NOI timely filed?		Yes
<b>Showing of eligible customer status (§1802(b) or eligible local government entity status (§§ 1802(d), 1802.4):</b>		
5. Based on ALJ ruling issued in proceeding number:	A.23-10-001	A.18-11-005
6. Date of ALJ ruling:	June 3, 2024	6/24/19
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
<b>Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):</b>		
9. Based on ALJ ruling issued in proceeding number:	A.23-10-001	A.18-11-005
10. Date of ALJ ruling:	June 3, 2024	6/24/19
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
<b>Timely request for compensation (§1804(c)):</b>		
13. Identify Final Decision:	D.24-11-004 for which the application for rehearing was by D.25-06-067 denied.	D.25-06-027
14. Date of issuance of Final Order or Decision:	Nov. 18, 2024, and June 27, 2025	6/27/25
15. File date of compensation request:	Aug. 26, 2025	Verified
16. Was the request for compensation timely?		Yes

<sup>1</sup> All statutory references are to California Public Utilities Code unless indicated otherwise.

**C. Additional Comments on Part I:**

#	Intervenor's Comment(s)	CPUC Discussion
B.9-10	<p>SBUA also received a ruling on its customer status and showing of significant financial hardship in A.18-11-005 on June 24, 2019, within one year prior to SBUA commencing activities in A.19-09-009. <i>See</i> Pub. Util. Code §1804(b)(1).</p>	Noted
B.13-15	<p>R.19-09-009 is currently open to consider the Petition for Modification of D.20-06-017 of the California Solar &amp; Storage Association. Rule 17.3 permits intervenors to file compensation requests while a proceeding is still open.</p> <p>In addition, Rule 17.3 provides that a compensation request is timely if filed within 60 days of an order denying rehearing on an issue to which the intervenor believes it contributed or upon closure of the proceeding. D.25-06-067, which denied the Application for Rehearing (AFR) of D.24-11-004 and closed the Track 5 portion of the proceeding, satisfies both triggers. Accordingly, SBUA's request is timely, both because the docket remains open and because the denial of rehearing independently triggered Rule 17.3. <i>See, e.g.</i>, D.23-04-033 at 3-4; D.11-06-016 at 2-3.</p> <p>In this proceeding, both SBUA and AMR advocated for broader eligibility under multi-property microgrid tariffs, specifically challenging SCE's restrictive tariff requirements and supporting eligibility for customers with multiple premises. <i>See</i> SBUA Opening Comments, Oct. 27, 2023, at 2-3; SBUA Reply Comments, Nov. 13, 2023, at 2 (supporting AMR arguments). Applied Medical Resources Corporation (AMR) raises the same issues in its AFR, seeking to expand eligibility of SCE's tariff to additional multiple property scenarios. The Commission's denial of the AFR in D.25-06-067 therefore directly implicates issues to which SBUA believes it contributed.<sup>2</sup></p> <p>Rule 17.3 is designed to avoid piecemeal, overlapping claims by allowing intervenors to defer until rehearing is resolved, thereby promoting Commission efficiency. Moreover, for a filing to be timely, the Commission need not agree that the contributions believed to be made by the intervenor were actually substantial; such a substantive determination is made on the merits of the claim and is unrelated to the threshold procedural question of timeliness. <i>See</i> D.23-04-033 at 3-4.</p> <p>SBUA also need not claim a substantial contribution to D.25-06-067 for this compensation request to be timely. <i>See</i> D.22-08-020 at 3 (holding that an intervenor's compensation request was timely under Rule 17.3 when filed within 60 days after a decision denying an AFR, even though the intervenor did not claim time for work on the AFR).</p>	Noted

<sup>2</sup> In addition, SBUA more generally supported the Commission's re-examination of stakeholder proposals. Reply Comments of Small Business Utility Advocates to the September 17, 2024, Proposed Decision Comments, Oct. 7, 2024, at 2-3 ("SBUA supports the need for further consideration of stakeholder proposals that expand access to multi-property microgrids"). The AFR sought reconsideration of AMR's proposal to expand access to multi-property microgrids.

## 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><b>1. <u>Track 3 – Suspension of Capacity Reservation on Standby Charge</u></b></p> <p>To develop a record for Track 3, the Commission directed parties to answer a series of questions set forth by the February 9, 2021, Amended Scoping Memo and Ruling.</p> <p>SBUA contributed significantly to the development of this Track 3 record by advancing a balanced, evidence-based approach to standby charges for microgrids. In its March 10, 2021, Reply Comments, SBUA rebutted arguments from the six microgrid companies (Bloom Energy, Clean Coalition, CCDC, FuelCell Energy, MRC, and Unison) that sought a broad waiver or exemption of standby charges, emphasizing that these asserted benefits were unsubstantiated. SBUA urged the Commission to reject blanket exemptions unless parties could provide record evidence of quantifiable system benefits SBUA Reply Comments on Track 3, Mar. 10, 2021, at 2–5, 8–9; <i>see also</i> id. at 8 (“testimony and an evidentiary hearing may be necessary” to resolve disputed factual claims).</p> <p>In addition, SBUA generally agreed with the Proposed Decision but raised the need for consistent treatment of standby charges across both microgrid and net energy metering (NEM) contexts. SBUA recommended performance-based exemptions for both and coordination with the ongoing NEM successor tariff</p>	<p>Consistent with SBUA's advocacy, the Commission's Track 3 Decision, D.21-07-011, rejected a general waiver of standby charges for microgrids based on the failure of parties to provide sufficient factual support. D.21-07-011 at 25 (“the record upon which we consider the topic of waiving or reducing standby charges for microgrids shows that: (1) there are no facts to support a blanket waiver or reduction of standby charges...Therefore, we reject a blanket waiver of standby charges”). The Commission specifically analyzed the lack of substantiation for claimed benefits, <i>id.</i> at 22–24, consistent with SBUA's position that each benefit required evidence-based support.</p> <p>The Commission's determination that “[t]here is insufficient information at this time to support the arguments that standby charges do not accurately reflect the cost to provide service or the broad resiliency value,” <i>id.</i> at 27, also directly aligns with SBUA's challenge to</p>	<p>Verified</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>proceeding (R.20-08-020) to avoid regulatory conflicts. Reply Comments of Small Business Utility Advocates to the Proposed Decision Adopting a Suspension of the Capacity Reservation Component of the Standby Charge, July 6, 2021, at 1-3. While the Commission did not adopt SBUA's suggestion to coordinate standby charges with the NEM proceeding, SBUA's advocacy demonstrated comprehensive regulatory awareness and raised important considerations for future proceedings.</p>	<p>unsubstantiated microgrid party claims.</p> <p>Instead of a blanket waiver, the Commission adopted a limited suspension of only the capacity reservation component of standby charges, subject to strict performance standards including an 85% capacity factor and 95% availability requirement D.21-07-011 at 28-29. This performance-based approach reflects SBUA's advocacy for evidence-based, measurable criteria rather than blanket exemptions.</p>	
<p><b>2. <u>Track 4 – Summer 2022 &amp; 2023 Reliability</u></b></p> <p>In response to the August 17, 2021, Amended Scoping Memo and the August 23, 2021, Administrative Law Judge's ruling directing parties to submit microgrid and resiliency proposals, SBUA critically evaluated and commented on numerous party proposals, including those submitted by the Investor-Owned Utilities (IOUs), Cal Advocates, and Vote Solar.</p> <p>Comments of Small Business Utility Advocates to the August 23 Ruling on Potential Microgrid &amp; Resiliency Solutions for Commission Reliability Action to Address Governor Newsom's July 30, 2021, Proclamation of a State of Emergency, Sept. 24, 2021 (SBUA Comments on Proposals).</p> <p>SBUA distinguished between behind-the-meter (BTM) measures providing only single-customer resilience and proposals</p>	<p>D.21-12-004 considers SBUA's recommendations and encouraged SBUA and others to resubmit proposals in future tracks or related proceedings. D.21-12-004 at 23 ("SBUA [...] recommends expediting the development of front-of-the-meter (FOM) microgrids for co-located customers (i.e., buildings and strip malls)"), at 44 (encouraging parties to submit proposals at a later phase or another proceeding).</p> <p>D.21-12-004 also cites SBUA's opposition to Cal Advocates' dismissal of PG&amp;E's proposal, stressing that the capacity shortage was a "last-resort situation where all options should be on the table." <i>Id.</i> at 23. The decision partially reflects this by directing PG&amp;E to study</p>	<p>Not Verified; while D.21-12-004 recognizes SBUA's stance regarding this issue, it does not adopt their proposal.</p> <p>Additionally, D.21-12-004 at 44 states, "...SBUA seeks clarification on whether its proposal may be considered by the Commission at a future point in time... SBUA('s)...proposal indeed, may fit more appropriately within the future contours of a non-expedited phase of this proceeding or within</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>capable of broader system benefits. SBUA Comments on Proposals, at 1-3. SBUA urged the Commission to expedite front-of-the-meter (FOM) microgrids for co-located customers (e.g., multi-unit dwellings, office buildings, strip malls), <i>id.</i>, and described two feasible configurations for shared solar and storage resources. <i>Id.</i> at 2.</p> <p>SBUA further cautioned against Cal Advocates' dismissal of PG&amp;E's proposal, emphasizing that in a last-resort capacity shortfall all resource options should remain available. <i>Id.</i> at 3-4. SBUA warned that SDG&amp;E's circuit-level storage concepts had been previously rejected and should not be treated as substitutes for "real" microgrids capable of reducing system load. <i>Id.</i> at 3. SBUA generally supported Vote Solar's proposal to expand BTM storage but recommended more flexible dispatch requirements to ensure responsiveness to CAISO signals rather than fixed peak windows. <i>Id.</i> at 5-6.</p> <p>SBUA also filed comments on the Proposed Decision, requesting clarification that its FOM proposal for co-located customers remain open for future consideration. SBUA recommended modest revisions to explicitly note that such proposals could be considered in subsequent tracks or related proceedings. Opening Comments of Small Business Utility Advocates to the Proposed Decision Adopting Microgrid and Resiliency Solutions to Enhance Summer 2022 and Summer 2023 Reliability, Nov. 10, 2021, at 2-3.</p>	<p>expansion of its temporary generation program (largely fossil-fueled resources) for summer 2022 reliability. <i>Id.</i> at 27.</p> <p>Finally, while authorizing SDG&amp;E to pursue up to four circuit-level projects, D.21-12-004 conditions approval on providing peak and net-peak benefits, <i>id.</i> at 33-34, reflecting SBUA's concern that such projects, unlike true microgrids, must demonstrate measurable grid value rather than merely shifting load on a single circuit.</p>	<p>another proceeding, like R.20-05-012."</p> <p><i>See Part III.D CPUC Comments, Disallowances and Adjustments [6].</i></p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p><b><u>3. Track 5 – Multi-Property Microgrid Tariff</u></b></p> <p>SBUA participated in Track 5 and made substantial contributions to the development of the multi-property microgrid tariff through an analysis of both IOU and stakeholder proposals, with particular focus on protecting small businesses and ESJ communities from cost shifts while ensuring equitable access to microgrid benefits.</p> <p><i>Customer Eligibility</i></p> <p>SBUA identified inconsistencies in the IOUs' October 9, 2023, joint filing, particularly highlighting that each IOU filed separate proposals rather than one unified tariff as directed. Opening Comments of Small Business Utility Advocates to the IOU Multi-Property Tariff Filing on October 9th, Oct. 27, 2023, (SBUA Opening Comments on Multi-Property Tariff) at 1. SBUA specifically identified that SCE's eligibility criteria requiring two customers was more restrictive than the PG&amp;E and SDG&amp;E allowances for two premises, which would exclude single customers with multiple eligible premises. <i>Id.</i> at 2-3. SBUA also objected to PG&amp;E's arbitrary 20 MW cap when SCE and SDG&amp;E had no similar limitation. Reply Comments of Small Business Utility Advocates on IOU Multi-Property Tariff Proposals, Nov. 13, 2023, (SBUA Reply Comments on Multi-Property Tariff) at 2. Eligibility issues were also raised in the AFR of D.24-11-004, and the Commission's</p>	<p><i>Customer Eligibility</i></p> <p>With respect to SCE's proposal, "SBUA states SCE requires a minimum of two customers in the multi-property microgrid footprint while PG&amp;E and SDG&amp;E allow two customers or two premises, accounting for scenarios where a single customer controls multiple premises. We agree that SCE's eligibility criteria lack specificity and may imply that only SCE retail customers are allowed to be in the multi-property microgrid footprint, or that two premises controlled by the same customer are not eligible for the multi-property microgrid tariff. We find that SCE should be required to include a provision allowing wholesale distribution customers in the multi-property microgrid footprint at its discretion. We also find that SCE should be required to match the eligibility criteria proposed by PG&amp;E and SDG&amp;E to allow two premises to be the minimum eligibility requirement for a multi-property microgrid." D.24-11-004 at 70-71.</p> <p>With respect to PG&amp;E's proposal, "...SBUA, and Sunnova argue that a 20MW cap is arbitrary and</p>	<p>Verified; however, the language SBUA cites here in D.24-11-004 is at 73-74, not 70-71.</p> <p>Verified; however, the language SBUA cites here in D.24-11-004 is at 74, not 71.</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>denial of rehearing in D.25-06-067 confirms the finality of those issues.</p> <p><i>ESJ Impacts</i></p> <p>SBUA was among the few parties to consistently raise concerns about ESJ impacts. Early on, SBUA emphasized that the IOUs failed to evaluate how their proposals align with and impact ESJ communities. SBUA Opening Comments on Multi-Property Tariff at 1-2; SBUA Reply Comments on Multi-Property Tariff at 1-2. In response to the Commission's specific request for ESJ alignment comments, SBUA provided analysis explaining how well-designed microgrid tariffs could advance ESJ goals while warning against excessive cost shifting that would harm ESJ communities. Opening Comments of Small Business Utility Advocates on Alignment of Microgrid Tariff Proposals with the Commission's Environmental and Social Justice Action Plan Goals, May 3, 2024, (SBUA Opening Comments on ESJ Issues) at 2-3. SBUA stressed the importance of addressing non-residential equity and small business needs in ESJ communities and concluded that "the stakeholders proposing microgrid tariff proposals, unfortunately, still do not provide concrete, tangible responses" to the ESJ Action Plan goals. Reply Comments of Small Business Utility Advocates on Alignment of Microgrid Tariff Proposals with the Commission's Environmental and Social Justice Action Plan Goals, May 17, 2024, (SBUA Reply Comments on ESJ Issues) at 3-4.</p>	<p>unnecessary and point to SCE and SDG&amp;E having no similar cap for their respective tariffs. We agree. Therefore, we modify the 20MW limit from PG&amp;E's tariff, for purposes of consistency and continuity." <i>Id.</i> at 71.</p> <p><i>ESJ Impacts</i></p> <p>The Commission rejected all stakeholder proposals, finding they could pose risks of adverse ratepayer impacts and may not deliver cost-effective or equitable benefits to ESJ communities. D.24-11-004 at 60-61; <i>see also id.</i> at 59 (recognizing SBUA's concerns about cost shifts)</p> <p><i>Specific Stakeholder Proposals</i></p> <p>With regard to the party proposals for a multi-property microgrid tariff, the Commission analyzed SBUA's support for complementary aspects of various stakeholder proposals, D.24-11-004 at 21, 26, 57, although the Commission ultimately rejected all stakeholder proposals. <i>Id.</i> at 31-32. SBUA's analysis, which, for example, supported proposal elements that avoided cost shifts, contributed valuable perspective to the record for the Commission's evaluation of cost-causation principles. <i>See, e.g., id.</i> at 57 (citing</p>	<p>Not Verified; while D.24-11-004 recognizes SBUA's stance regarding this issue, it does not adopt their proposal.</p> <p>Not Verified; also, the language SBUA cites here in D.24-11-004 is at 22, 27, and 59. Additionally, while D.24-11-004 at 59 does recognize SBUA's stance regarding this issue, it does not adopt their proposal.</p> <p>D.24-11-004 at 97 states, "SBUA recommends that the Commission consider the following recommendation: Due to the benefits of the multi-property microgrid tariff approved, the IOUs must adhere to the timelines contained in the Orders, barring extraordinary circumstances requiring a requested</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p><i>Specific Stakeholder Proposals</i></p> <p>SBUA analyzed party-proposed tariffs and supported MRC's proposal for having microgrids set energy prices for power produced within the microgrid, with safeguards requiring coordination with local government for residential and small business customers. Opening Comments of Small Business Utility Advocates to the Party-Proposed Multi-Property Tariff Filing on December 15th, Jan. 12, 2024, (SBUA Opening Comments on Party-Proposed Multi-Property Tariff) at 1-2. SBUA also supported Clean Coalition's Resilient Energy Subscription (RES) proposal as a complementary fee-based market mechanism that could provide financial compensation to community microgrids without shifting costs. <i>Id.</i> at 2; <i>see also</i> SBUA Opening Comments on Multi-Property Tariff) at 3 (Joint IOUs and Clean Coalition proposals avoid cost-shifting). After the PD was released, SBUA supported further consideration of stakeholder proposals to expand access to multi-property microgrids for ESJ communities, agreed with Clean Coalition that CMET remains narrowly focused on critical government facilities, and emphasized that the proposed RES could be a valuable complement to CMET. Reply Comments of Small Business Utility Advocates on Proposed Decision, Oct. 14, 2024, (SBUA Reply Comments on PD) at 3-5; <i>see also</i> Application for Rehearing (AFR) of D.24-11-004 (request to reconsider AMR stakeholder proposal).</p>	<p>SBUA's position that "both the Joint IOUs and Clean Coalition proposals have the benefit of avoiding prohibited cost shifting to non-benefiting customers").</p>	<p>delay. SBUA also states that it supports the positions of Clean Coalition in response to this Decision. We decline to adopt SBUA's recommendations. Our Decision clearly states the timelines that the Joint IOUs must comply with. SBUA's recommendation is duplicative of this Decision's, and our prior Decisions, requirements that are already in place. Finally, we reject SBUA's support of Clean Coalition's positions for the reasons discussed above, and throughout, this Decision."</p> <p><i>See Part III.D CPUC Comments, Disallowances and Adjustments [6].</i></p>

**B. Duplication of Effort (§§ 1801.3(f) and 1802.5):**

	Intervenor's Assertion	CPUC Discussion
<b>a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?</b>	Yes	Verified
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	Yes	Verified
<b>c. If so, provide name of other parties:</b> Over 50 parties participate in various parts of Tracks 3-5 of this proceeding. These parties included, for example: California Energy Storage Alliance, Center for Sustainable Energy, Green Power Institute, Clean Coalition, Climate Center, Microgrid Resources Coalition, Vote Solar, and The Utility Reform Network.		Noted
<b>d. Intervenor's claim of non-duplication:</b> SBUA participated on behalf of small businesses, 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 microgrid adoption and deployment. While there were occasional overlaps with other parties, SBUA's rationale and emphasis were distinct. For example, in Track 4, both SBUA and Vote Solar supported expediting front-of-the-meter microgrids for co-located customers, but SBUA's advocacy was based on small business interests and our experts' particular analyses. Similarly, in Track 5, SBUA agreed with other parties on the need for a multi-property microgrid tariff but consistently highlighted how restrictive eligibility criteria and cost-shifting would affect small business customers in particular. In addition to formal filings, SBUA actively engaged in workshops and working groups, where it advanced perspectives specific to small business customers and contributed to the development of the record in ways not addressed by other parties. Throughout the proceeding, SBUA made reasonable efforts to minimize duplication and ensured that its participation supplemented, rather than repeated, the positions of other stakeholders. For these reasons, the Commission should find that SBUA's perspectives and goals were necessarily different from other parties and supplemented, not duplicated, any efforts on common issues.		Noted; however, <i>See Part III.D</i> CPUC Comments, Disallowances and Adjustments [6].

### PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
<p><b>a. Intervenor's claim of cost reasonableness:</b></p> <p>SBUA actively participated in Tracks 3-5 of this proceeding from 2021 through 2025, with the primary objective of protecting and advancing the interests of small business ratepayers, an often-overlooked yet essential customer class in the development of microgrid infrastructure, policies, and tariffs. To that end, SBUA engaged extensively in workshops, working groups, and submitted multiple rounds of substantive comments addressing complex technical and policy issues.</p> <p>SBUA's compensation request seeks an award for approximately 235.4 hours of professional work related to three Decisions and for work spanning numerous years, excluding compensation-related hours. The Commission should find this reasonable because SBUA dedicated considerable resources, with both internal staff and outside consultants, to analyze complex technical and regulatory issues, attend numerous time-intensive workshops and working groups, and draft substantive comments in response to Commission requests and to analyze numerous IOU and stakeholder proposals.</p> <p>As demonstrated above, the Commission explicitly cited, analyzed, and in multiple instances adopted SBUA's positions in its Decisions. These substantive contributions merit the requested compensation given the significant long-term implications for small business ratepayers who will benefit from microgrids and energy resiliency.</p>	Noted; however, <i>See Part III.D CPUC Comments, Disallowances and Adjustments [6].</i>
<p><b>b. Reasonableness of hours claimed:</b></p> <p>SBUA devoted the resources of several attorneys and experts to participate in Tracks 3, 4, and 5. Considering 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 are warranted given the proceeding's complexity and technical demands, which required significant expertise, detailed analysis, and active engagement across multiple working groups.</p> <p>SBUA Litigation Supervisor, Jennifer Weberski, an employee of SBUA with 25 years of regulatory experience, worked on legal filings and coordinated SBUA's engagement. Based on SBUA's participation in related rate proceedings and her decades of legal expertise, Ms. Weberski efficiently managed SBUA's participation and devoted a reasonable amount of time.</p> <p>SBUA Senior Energy Policy Analyst, Ted Howard, an employee of SBUA with over 40 years of professional experience, attended workshops and</p>	Noted; however, <i>See Part III.D CPUC Comments, Disallowances and Adjustments [6].</i>

assisted in developing SBUA's positions and comments on the wide range of microgrid issues under consideration. The significant expert hours devoted to workshops reflect their central role in this docket, as they served as the primary venues for developing proposals, testing eligibility criteria, and evaluating cost-shift and equity impacts.

SBUA also secured experts Paul Chernick and John Wilson of Resource Insight, Inc. (RII). Mr. Chernick, President of RII, brought over 40 years of experience in utility regulation and played a critical role in identifying and advancing SBUA's interests in this proceeding. He attended workshops and working groups and provided oversight and input into SBUA's comments. Senior expert Mr. Wilson, with more than 28 years of experience in utility regulation, assisted in developing positions in Track 3. RII provided services as an outside consultant on a deferred and contingency basis. *See Attachment 3* (contract between SBUA and RII).

In addition, SBUA's President and General Counsel, James Birkelund, participated in this proceeding by analyzing comments, developing litigation positions, providing strategic direction, and overseeing the legal team. Mr. Birkelund was previously an employee of SBUA, but in 2023 and onwards, he provided services as outside counsel at the law firm of E&E Law Corp. on a contingency and deferral basis. *See Attachment 4* (attorney-client agreement, filed under seal). The Commission has previously approved this outside consultant arrangement. *See, e.g.*, 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.

Given the magnitude of this OIR's impact on small business and other customers and the importance of microgrid deployment in California, SBUA submits that the time recorded represents an appropriate level of engagement and effort to participate in Tracks 3-5. Accordingly, SBUA seeks compensation for all hours submitted by its attorneys and experts, as set forth in the attached timesheets.

<b>c. Allocation of hours by issue:</b>	Noted; totals 100%
1. Standby Charges (D.21-07-011) – 28 hours / 12.2%	
2. Summer Reliability Measures (D.21-12-004) – 24.05 hours / 10.2%	
3. Customer Eligibility (D.24-11-004) – 20.75 hours / 8.8%	
4. ESJ Impacts (D.24-11-004) – 20.9 hours / 8.9%	
5. Stakeholder Proposals (D.24-11-004) – 36.95 hours / 15.7%	
6. Workshops, Webinars, Working Groups – 95.95 hours / 40.8%	
7. General Participation – 8 hours / 3.4%	

**B. Specific Claim:\***

CLAIMED					CPUC AWARD			
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Jennifer Weberski	2021	17.25	\$625.00	D.22-01-012	\$10,781.25	6.00 [6]	\$625.00	\$3,750.00
Jennifer Weberski	2023	15.5	\$705.00	D.24-02-031	\$10,927.50	4.00 [6]	\$705.00	\$2,820.00
Jennifer Weberski	2024	25.5	\$735.00	D.25-06-029	\$18,742.50	7.50 [6]	\$735.00	\$5,512.00
Ted Howard	2021	1.2	\$425.00	D.22-12-051	\$510.00	0.60 [7]	\$425.00	\$255.00
Ted Howard	2022	1.5	\$440.00	D.24-01-025	\$660.00	0.75 [7]	\$440.00	\$330.00
Ted Howard	2023	22.55	\$460.00	D.24-03-070	\$10,373.00	11.27 [7]	\$460.00	\$5,184.20
Ted Howard	2024	6.3	\$480.00	As above, escalated by 4.07% for 2024	\$3,024.00	2.25 [6, 7]	\$500.00 [2]	\$1,125.00
John Wilson	2021	13	\$380.00	D.22-08-046	\$4,940.00	13.00	\$380.00 [3]	\$4,940.00
Paul Chernick	2021	65.5	\$465.00	D.23-11-031	\$30,457.50	35.50 [6, 7]	\$465.00 [4]	\$16,507.50
Paul Chernick	2022	12.5	\$505.00	D.23-11-031	\$6,312.50	8.50 [7]	\$505.00 [4]	\$4,292.50
Paul Chernick	2023	5.5	\$530.00	D.25-06-029	\$2,915.00	2.75 [7]	\$530.00 [4]	\$1,457.50
Paul Chernick	2024	5	\$555.00	As above, escalated by 4.07% for 2024	\$2,775.00	0.00 [6]	\$555.00 [4]	\$0.00
James Birkelund	2021	5.7	\$650.00	D.22-08-046	\$3,705.00	3.70 [6, 7]	\$650.00 [5]	\$2,405.00
James Birkelund	2022	4.9	\$705.00	D.23-02-016	\$3,454.50	2.55 [6, 7]	\$705.00 [5]	\$1,797.75
James Birkelund	2023	14.25	\$770.00	D.24-10-025	\$10,972.50	8.60 [6, 7]	\$770.00 [5]	\$6,622.00
James Birkelund	2024	19.25	\$800.00	D.24-12-069	\$15,400.00	4.15 [6, 7]	\$800.00 [5]	\$3,320.00

James Birkelund	2025	0.25	\$830.00	D.25-07-036	\$207.50	0.25	\$830.00 [5]	\$207.50
<i><b>Subtotal: \$136,157.75</b></i>					<i><b>Subtotal: \$60,525.95</b></i>			
<b>INTERVENOR COMPENSATION CLAIM PREPARATION **</b>								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Jennifer Weberski	2025	16.75	\$380.00	50% of 2025 Rate of \$760.00 (i.e., 2024 rate of \$735.00, escalated by 3.46% and rounded to nearest \$5.00)	\$6,365.00	10.00 [8]	\$380.00 [1]	\$3,800.00
<i><b>Subtotal: \$6,365.00</b></i>					<i><b>Subtotal: \$3,800.00</b></i>			
<i><b>TOTAL REQUEST: \$142,522.75</b></i>					<i><b>TOTAL AWARD: \$64,325.95</b></i>			

\*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's 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

<b>ATTORNEY INFORMATION</b>			
Attorney	Date Admitted to CA BAR <sup>3</sup>	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

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

**C. Attachments Documenting Specific Claim and Comments on Part III:**

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Timesheets of Attorneys & Experts
Attachment 3	Contract with Resource Insight, Inc.
Attachment 4	Attorney-Client Agreement with E&E Law

**D. CPUC Comments, Disallowances, and Adjustments**

Item	Reason
[1] Jennifer Weberski (Weberski) 2025 Hourly Rate	<p>SBUA requests an hourly rate of \$760.00 for Weberski in 2025. For Weberski's 2025 hourly rate, the Commission applies the annual escalation methodology adopted in Resolution ALJ-393, which is a percent change of 3.46%. With a 2024 rate of \$735.00 previously established for Weberski, and based on the escalation factor of 3.46%, a 2025 rate of \$760.00 is calculated, rounded to the nearest five dollars.</p> <p>As Intervenor Compensation Claim Preparation hours are compensated at <math>\frac{1}{2}</math> preparer's normal hourly rate, we apply the rate of \$380.00 for Weberski in 2025.</p>
[2] Ted Howard (Howard) 2024 Hourly Rate	D.25-07-036 previously approved the rate of \$500.00 for Howard in 2024.
[3] John Wilson (Wilson) 2021 Hourly Rate	<p>Upon further review, we note that SBUA failed to identify Wilson as a consultant, instead of a full-time staff member of SBUA.</p> <p>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 level.<sup>4</sup> 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>The Commission requested supplemental documentation be submitted by SBUA to confirm the rate charged by Wilson. SBUA confirms that per the terms of their contract, Wilson has been hired on a contingency basis,</p>

<sup>4</sup> D.07-01-009, D.08-04-010, and ALJ Resolution ALJ 235.

	<p>meaning that the consultant 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 Wilson's experience. Given the 2021 Expert – Public Policy Analyst IV rate range is \$263.72 to \$493.98 with a median of \$373.20, we find the 2021 hourly rate of \$380.00 to be reasonable and we apply it here.</p> <p>The award made herein for the consultant's contribution in this proceeding shall be passed through in full to the consultant, and no portion of this part of the award shall be kept by the intervenor. 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 <u>the terms of the contract</u>, to adhere to the Commission's policy on compensation for consultant fees, and to provide the appropriate documentation with the <i>initial</i> claim to ensure efficient processing, and thus avoid the need for the Commission to request supplemental documentation. In this instance, SBUA did not provide all the documentation pertaining to the contract terms between SBUA and Wilson in the initial claim and waited until the Commission requested supplemental documentation which delays the processing of the claim.</p>
<p>[4] Paul Chernick (Chernick) 2021, 2022, 2023 and 2024 Hourly Rates</p>	<p>Upon further review, we note that SBUA failed to identify Chernick as a consultant, instead of a full-time staff member of SBUA.</p> <p>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 level.<sup>5</sup> 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>The Commission requested supplemental documentation be submitted by SBUA to confirm the rate charged by Chernick. SBUA confirms that per the terms of their contract, Chernick has been hired on a contingency basis, meaning that the consultant 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 Chernick's experience. Given the 2021 Expert – Public Policy Analyst V rate range is \$491.99 to \$868.71 with a median of</p>

<sup>5</sup> D.07-01-009, D.08-04-010, and ALJ Resolution ALJ 235.

	<p>\$650.89, we find the 2021 hourly rate of \$465.00 to be reasonable and we apply it here.</p> <p>Given the 2022 Expert – Public Policy Analyst V rate range is \$513.53 to \$890.25 with a median of \$672.43, we find the 2022 hourly rate of \$505.00 to be reasonable and we apply it here.</p> <p>Given the 2023 Expert – Public Policy Analyst V rate range is \$543.52 to \$920.24 with a median of \$702.42, we find the 2023 hourly rate of \$530.00 to be reasonable and we apply it here.</p> <p>Given the 2024 Expert – Public Policy Analyst V rate range is \$572.11 to \$948.83 with a median of \$731.01, we find the 2024 hourly rate of \$555.00 to be reasonable and we apply it here.</p> <p>The award made herein for the consultant’s contribution in this proceeding shall be passed through in full to the consultant, and no portion of this part of the award shall be kept by the intervenor. 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 <u>the terms of the contract</u>, to adhere to the Commission’s policy on compensation for consultant fees, and to provide the appropriate documentation with the <i>initial</i> claim to ensure efficient processing and thus avoid the need for the Commission to request supplemental documentation. In this instance, SBUA did not provide all the documentation pertaining to the contract terms between SBUA and Chernick in the initial claim and waited until the Commission requested supplemental documentation which delays the processing of the claim.</p>
<p>[5] James Birkelund (Birkelund) 2021, 2022, 2023 and 2024 Hourly Rates</p>	<p>Upon further review, we note that SBUA failed to identify Birkelund as a consultant, instead of a full-time staff member of SBUA.</p> <p>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 level.<sup>6</sup> 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>

<sup>6</sup> D.07-01-009, D.08-04-010, and ALJ Resolution ALJ 235.

The Commission requested supplemental documentation be submitted by SBUA to confirm the rate charged by Birkelund. SBUA confirms that per the terms of their contract, Birkelund has been hired on a contingency basis, meaning that the consultant 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 Birkelund's experience. Given the 2021 Legal Director – III rate range is \$396.85 to \$673.25 with a median of \$529.19, we find the 2021 hourly rate of \$650.00 to be reasonable and we apply it here.

Given the 2022 Legal Director – IV rate range is \$489.85 to \$803.97 with a median of \$643.51, we find the 2022 hourly rate of \$705.00 to be reasonable and we apply it here.

Given the 2023 Legal Director – IV rate range is \$518.55 to \$832.67 with a median of \$672.21, we find the 2023 hourly rate of \$770.00 to be reasonable and we apply it here.

Given the 2024 Legal Director – IV rate range is \$545.91 to \$860.03 with a median of \$699.57, we find the 2024 hourly rate of \$800.00 to be reasonable and we apply it here.

Given the 2025 Legal Director – IV rate range is \$570.12 to \$884.24 with a median of \$723.78, we find the 2025 hourly rate of \$830.00 to be reasonable and we apply it here.

The award made herein for the consultant's contribution in this proceeding shall be passed through in full to the consultant, and no portion of this part of the award shall be kept by the intervenor. 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.

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, SBUA did not provide all the documentation pertaining to the contract terms between SBUA and Birkelund in the initial claim and waited until the Commission requested supplemental documentation which delays the processing of the claim.

[6] Lack of Substantial Contribution	<p>The Commission compensates for efficient efforts that contribute to the proceeding's outcomes; however, the Commission also disallows inefficient participation that does not contribute to the underlying issues. SBUA claims several hours for work related to Summer Reliability Measures (Issue 2), ESJ Impacts (Issue 4), and Stakeholder Proposals (Issue 5) that did not have a bearing on a Commission decision. Because this work did not substantially contribute to a Commission decision, the following hours are reduced.</p> <ul style="list-style-type: none"> <li>• Weberski - 40.75 hours for work related to these issues between 2021-2024.</li> <li>• Howard - 2.30 hours for work related to these issues in 2024.</li> <li>• Chernick - 17.50 hours for work related to these issues in 2021 and 2024.</li> <li>• Birkelund- 21.35 hours for work related to these issues between 2021-2024.</li> </ul>
[7] Excessive Hours Claimed - Workshops, Webinars, Working Groups	<p>SBUA claims a total of 95.95 hours for work and attendance related to multiple workshops, webinars, and working groups. While some of these hours are attributable to tasks that contributed to SBUA's work in this proceeding, many did not. These hours are directly related to issue areas in which SBUA was found to have made no or limited contribution, as mentioned above in item [6]. Furthermore, the 95.95 hours claimed for these activities represent 40.8% of all of SBUA's hours claimed, which we find excessive. We therefore determine that a 50% reduction of these hours is appropriate. The following hours are reduced:</p> <ul style="list-style-type: none"> <li>• Howard - 14.37 hours for work related to these issues between 2021-2024.</li> <li>• Chernick - 29.75 hours for work related to these issues between 2021-2023.</li> <li>• Birkelund - 3.85hours for work related to these issues between 2021-2024.</li> </ul>
[8] Excessive IComp Claim Preparation	<p>Section 1801.3(f) provides that the Commission should administer the Intervenor Compensation Program "in a manner that avoids unproductive or unnecessary participation that duplicates the participation of similar interests otherwise adequately represented or participation that is not necessary for a fair determination of the proceeding."</p> <p>We find the request for 16.75 hours to prepare SBUA's Intervenor Compensation Claim by Weberski to be unreasonable and excessive given the scope of issues and overall scale of the request. Hours claimed must be reasonable, productive, effective, and efficient. We find that the hours claimed are excessive for the work produced and for breadth of this claim.</p>

	As a result, we have reduced Weberski's time spent preparing this IComp Claim by 6.75 hours, resulting in a total of 10.00 hours awarded.
[9] Intervenor Responsibility for Transparency and Accuracy in Compensation Requests	<p>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.</p> <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))**

<b>A. Opposition: Did any party oppose the Claim?</b>	No
<b>B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?</b>	No

If not:

Party	Comment	CPUC Discussion

**FINDINGS OF FACT**

1. Small Business Utility Advocates has made a substantial contribution to D.24-11-004, D.21-12-004 and D.21-07-011.

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, 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 \$64,325.95.

**CONCLUSION OF LAW**

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

**ORDER**

1. Small Business Utility Advocates shall be awarded \$64,325.95.

2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall pay Small Business Utility Advocates their respective shares of the award, based on their California-jurisdictional electric revenues for the 2021 calendar year, to reflect the year in which the proceeding was primarily litigated. If such data is unavailable, the most recent 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 November 9, 2025, the 75<sup>th</sup> 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 not waived.

This decision is effective today.

Dated \_\_\_\_\_, 2026, at Santa Maria, California.

**APPENDIX**  
**Compensation Decision Summary Information**

<b>Compensation Decision:</b>		<b>Modifies Decision?</b>	No
<b>Contribution Decision(s):</b>	D2411004, D2112004, and D2107011		
<b>Proceeding(s):</b>	R1909009		
<b>Author:</b>	ALJ Debbie Chiv		
<b>Payer(s):</b>	Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company		

**Intervenor Information**

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
SMALL BUSINESS UTILITY ADVOCATES	8/26/25	\$142,522.75	\$64,325.95	N/A	<i>See Part III D. CPUC Comments, Disallowances, and Adjustments</i>

**Hourly Fee Information**

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Jennifer	Weberski	Attorney	\$625.00	2021	\$625.00
Jennifer	Weberski	Attorney	\$705.00	2023	\$705.00
Jennifer	Weberski	Attorney	\$735.00	2024	\$735.00
Jennifer	Weberski	Attorney	\$760.00	2025	\$760.00
Ted	Howard	Expert	\$425.00	2021	\$425.00
Ted	Howard	Expert	\$440.00	2022	\$440.00
Ted	Howard	Expert	\$460.00	2023	\$460.00
Ted	Howard	Expert	\$480.00	2024	\$500.00
John	Wilson	Expert	\$380.00	2021	\$380.00
Paul	Chernick	Expert	\$465.00	2021	\$465.00
Paul	Chernick	Expert	\$505.00	2022	\$505.00
Paul	Chernick	Expert	\$530.00	2023	\$530.00
Paul	Chernick	Expert	\$555.00	2024	\$555.00
James	Birkelund	Attorney	\$650.00	2021	\$650.00
James	Birkelund	Attorney	\$705.00	2022	\$705.00
James	Birkelund	Attorney	\$770.00	2023	\$770.00
James	Birkelund	Attorney	\$800.00	2024	\$800.00
James	Birkelund	Attorney	\$830.00	2025 <sup>7</sup>	\$830.00

<sup>7</sup> SBUA did not include this row for Birkelund's 2025 Hourly Rate Information. Information entered in this row is based on information provided by SBUA for Birkelund above in Part.III.B and in SBUA's submitted time records for Birkelund.