



Decision \_\_\_\_\_

**FILED****BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

04:46 PM

Application of Pacific Gas and Electric Company for  
Approval of Zonal Electrification Pilot Project (U 39G)Application 22-08-003-A2208003  
(Filed August 10, 2022)

**INTERVENOR COMPENSATION CLAIM OF THE UTILITY REFORM NETWORK  
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF  
THE UTILITY REFORM NETWORK**

**NOTE:** After electronically filing a PDF copy of this Intervenor Compensation Claim (Request), please email the document in an MS WORD and supporting EXCEL spreadsheet to the Intervenor Compensation Program Coordinator at [Icompcoordinator@cpuc.ca.gov](mailto:Icompcoordinator@cpuc.ca.gov).

<b>Intervenor:</b> The Utility Reform Network (TURN)	<b>For contribution to Decision (D.) 25-11-004</b>
<b>Claimed:</b> \$133,691.88	<b>Awarded:</b> \$
<b>Assigned Commissioner:</b> John Reynolds	<b>Assigned ALJ:</b> Camille Watts-Zagha
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
<b>Signature:</b>	/s/ Hayley Goodson
<b>Date:</b> 1/23/26	<b>Printed Name:</b> Hayley Goodson

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

<b>A. Brief description of Decision:</b>	In D.25-11-004, the Commission granted Pacific Gas and Electric Company's (PG&E's) motion to withdraw this application for a zonal building electrification project at California State University Monterey Bay (CSU Monterey Bay), which would have allowed PG&E to retire, instead of replace, a gas distribution pipeline in need of repair. While granting PG&E's motion, the Commission also recognized the value of the voluminous record developed before PG&E filed its motion to withdraw, and took steps to ensure the record will be made available for future use, if relevant to
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	future proceedings. Further, the Commission ordered PG&E to prepare and file a “Lessons Learned” report, with input from all parties, to memorialize policy, cost and ratepayer impacts, and operational experiences with the CSU Monterey Bay project.
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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:	9/29/22	
2. Other specified date for NOI:		
3. Date NOI filed:	10/27/22	
4. Was the NOI timely filed?		
<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.21-12-007	
6. Date of ALJ ruling:	5/31/22	
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		
<b>Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):</b>		
9. Based on ALJ ruling issued in proceeding number:	A.21-12-007	
10. Date of ALJ ruling:	5/31/22	
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.25-11-004	

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

	Intervenor	CPUC Verification
14. Date of issuance of Final Order or Decision:	11/25/25	
15. File date of compensation request:	1/23/26	
16. Was the request for compensation timely?		

**C. Additional Comments on Part I: (use line reference # as appropriate)**

#	Intervenor's Comment(s)	CPUC Discussion

**PART II: SUBSTANTIAL CONTRIBUTION**  
*(to be completed by Intervenor except where indicated)*

**A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059): (For each contribution, support with specific reference to the record.)**

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p><b>TURN contributed to the Commission's review of PG&amp;E's motion to withdraw its application in D.25-11-004.</b></p> <p>TURN articulated the standard of review when an applicant moves to withdraw its application. The Commission incorporated the legal standard TURN suggested nearly verbatim in D.25-11-004.</p> <p>TURN demonstrated that PG&amp;E's motion was poorly supported. TURN, and others, pointed to PG&amp;E's failure to explain why the procedural schedule adopted in July 2024 created new safety concerns, among other deficiencies. PG&amp;E supplemented its explanation in subsequent filings defending its motion to withdraw. The Commission agreed</p>	<ul style="list-style-type: none"> <li>• TURN Resp. to PG&amp;E Motion to Withdraw Application, 1/29/25, pp. 3-4</li> <li>• D.25-11-004, pp. 7-8</li> <li>• TURN Resp. to PG&amp;E Motion to Withdraw Application, 1/29/25, pp. 5-7</li> <li>• D.25-11-004, p. 11</li> </ul>	

<p>with TURN et al. that PG&amp;E's motion was vague and unspecific, though it found PG&amp;E's expanded explanation adequate and ultimately concluded that PG&amp;E should be permitted to withdraw its application.</p> <p>TURN, and others, argued that the electrification project offered benefits consistent with the public interest. The Commission agreed while granting PG&amp;E's motion.</p>	<ul style="list-style-type: none"><li>• TURN Resp. to PG&amp;E Motion to Withdraw Application, 1/29/25, p. 2</li><li>• D.25-11-004, p. 13</li></ul>	
<p><b>TURN demonstrated that the Commission should ensure the record of this proceeding will be made available for use in relevant future proceedings.</b></p> <p>TURN argued that if the Commission granted PG&amp;E's motion to withdraw the application, the Commission should preserve the record here for use in other relevant proceedings. To this end, TURN specifically recommended that the Commission:</p> <ol style="list-style-type: none"><li>1) Direct PG&amp;E to disclose the existence of this application, the record developed here, and the Commission's decision in all future PG&amp;E zonal building electrification proposals, including but not limited to SB 1221 projects;</li><li>2) Clarify that the entire record of this proceeding shall be available for potential use in future Commission proceedings to which it may be relevant.</li></ol> <p>The Commission agreed in D.25-11-004 that the evidentiary record in this proceeding could be helpful to future Commission proceedings addressing zonal electrification projects or</p>	<ul style="list-style-type: none"><li>• TURN Resp. to PG&amp;E Motion to Withdraw Application, 1/29/25, p. 12</li><li>• D.25-11-004, pp. 15-16; Finding of Fact 2; Conclusion of Law 2; Ordering Paragraph 2</li></ul>	

<p>decarbonization policies. The Commission also agreed that parties should be permitted to seek to bring work done in this proceeding into other relevant proceedings. The Commission accordingly required PG&amp;E to disclose the existence of the record of this proceeding in any future applications or comments on Orders Instituting Rulemaking relating to zonal electrification or decarbonization policy filed within three years of the issuance date of this decision.</p>		
<p><b>TURN demonstrated that the Commission should require PG&amp;E to prepare and file a Lessons Learned report with input from all interested parties.</b></p> <p>TURN argued that if the Commission granted PG&amp;E's motion to withdraw the application, the Commission should require PG&amp;E to publicly memorialize its lessons learned from experience with the CSUMB electrification project by preparing a report, with input from all interested parties, on this ambitious but ultimately unsuccessful zonal building electrification pilot program.</p> <p>When the proposed decision preceding D.25-11-004 required PG&amp;E to submit a Lessons Learned report without requiring PG&amp;E to obtain input from all interested parties, TURN (and others) advocated modification of the PD to make this requirement explicit.</p> <p>The Commission in D.25-11-004 modified the proposed decision as suggested by TURN et al. and ordered PG&amp;E to seek input from parties and collaboratively draft a 'lessons learned' report summarizing policy, cost and ratepayer impacts, and operational</p>	<ul style="list-style-type: none"><li>• TURN Resp. to PG&amp;E Motion to Withdraw Application, 1/29/25, p. 12</li><li>• TURN Reply Cmts. on PD, 10/27/25, pp. 1, 3</li><li>• Proposed Decision, Rev. 1, REDLINE, p. 16</li><li>• D.25-11-004, p. 16; Conclusion of Law 3; Ordering Paragraphs 3, 4</li><li>• Feedback of The Utility Reform Network (TURN) on PG&amp;E's Draft A.22-08-003 "Lessons Learned" Report, 1/14/26 (See</li></ul>	

<p>experiences with this project and to file the report in R.24-09-012 and in R.19-01-011.</p> <p>In compliance with D.25-11-004, PG&amp;E provided a draft Lessons Learned report to parties on December 23, 2005, for feedback. TURN provided written feedback to PG&amp;E to incorporate into the final Lessons Learned report, which will be filed by PG&amp;E by January 26, 2026 pursuant to Ordering Paragraph 4 of D.25-11-004. TURN's contribution to the Lessons Learned report contributes to the implementation of D.25-11-004, and specifically the Commission's recognition of the value of a Lessons Learned report reflecting the perspectives of all stakeholders, not just PG&amp;E.</p>	<p>Attachment 4 to this Claim)</p>	
<p><b>TURN contributed information and analysis to the record that the Commission recognized as valuable in D.25-11-004 and which informed the Commission's orders therein.</b></p> <p>The Commission's order requiring PG&amp;E to reference the record here in future related requests, discussed above, recognizes the value of parties' contributions, including TURN's. Similarly, the Commission's order requiring PG&amp;E to collaborate with the active parties in preparing and submitting a Lessons Learned report based on this proceeding, discussed above, recognizes the value of parties contributions to the proceeding learnings.</p> <p>TURN actively participated in this proceeding from its inception in September 2022 until its abrupt termination and contributed in</p>	<p><i>See, generally:</i></p> <ul style="list-style-type: none"><li>• D.25-11-004, pp. 15-16; Finding of Fact 2; Conclusion of Law 2; Ordering Paragraph 2</li><li>• D.25-11-004, p. 16; Conclusion of Law 3; Ordering Paragraphs 3, 4</li><li>• Ex. TURN-01 (TURN Testimony, 2/17/23), Ex. TURN-02 (TURN Rebuttal Testimony, 3/17/23), and Ex. TURN-03 (TURN Supplemental Testimony, 9/30/24) (identified in PG&amp;E Motion for Admission of Exhibits Into Evidence, 12/13/24, and admitted into</li></ul>	

<p>substantial ways to the proceeding record and lessons learned.</p> <p>TURN conducted extensive discovery on PG&amp;E's proposed CSU Monterey Bay electrification project and submitted three volumes of testimony addressing: (1) the need for the gas pipeline replacement project, which was not fully supported by PG&amp;E's application; (2) cost estimates for the gas pipeline project and electrification project; (3) PG&amp;E's Net Present Value (NPV) methodology for evaluating cost-effectiveness and impact of the proposed project on ratepayers, as well as other methodologies (Present Value of Revenue Requirements (PVRR); (4) cost containment approaches to ensure ratepayer neutrality if not net benefit; (5) cost recovery and ratemaking; and (6) data collection and reporting requirements to ensure the electrification pilot provided important information to inform future policy and projects.</p> <p>Once PG&amp;E re-started proceeding activities in mid-2024 after the year-long hiatus during negotiations between PG&amp;E and CSU Monterey Bay, TURN joined PG&amp;E representatives, other intervenors, and Commission staff in a site visit to the CSU Monterey Bay campus on July 29, 2024, which helped to inform TURN's subsequent analysis and supplemental testimony.</p> <p>TURN participated in a series of meetings over the course of the two-year proceeding with PG&amp;E and other parties to explore potential settlement of disputed issues. Once a global settlement appeared unlikely, parties' focus shifted to the potential for factual stipulations. TURN actively</p>	<p>evidence via 12/22/24 <i>Email Ruling Addressing Evidentiary Issues</i>)</p> <ul style="list-style-type: none"><li>• Motion of PG&amp;E to Adopt Joint Parties' Briefing Outline and Stipulations, 12/13/24, as clarified by PG&amp;E on December 27, 2024, Attachment A</li><li>• <i>Email Ruling of ALJ Camille Watts-Zagha Granting Motion to Adopt Stipulations, 7/18/25</i></li></ul> <p><i>Gas Pipeline Project Costs</i></p> <ul style="list-style-type: none"><li>• See, e.g., Ex. TURN-03, pp. 1-3</li><li>• Joint Parties Stipulations, # 19</li></ul> <p><i>Electrification Project Costs</i></p> <ul style="list-style-type: none"><li>• Ex. TURN-03, pp. 1-2</li><li>• Joint Parties Stipulations, # 18, 20</li></ul> <p><i>Cost Cap</i></p> <ul style="list-style-type: none"><li>• Ex. TURN-01, p. 8; Ex. TURN-02, pp. 4-5; Ex. TURN-03, p. 1</li></ul>	
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<p>participated in the negotiation of 43 factual stipulations contained in parties' joint motion filed on December 13, 2024, to reduce the extent of disputes before briefing. These stipulations provide value to the record and lessons learned, as highlighted below.</p> <p>In Ex. TURN-01, TURN-02, and TURN-03, TURN demonstrated that PG&amp;E's cost estimate for the gas pipeline project was too high because it assumed a unit cost that blended plastic pipe and steel pipe, when a lower plastic pipe unit cost should be used. TURN recommended a unit cost of \$578/mile in TURN's Supplemental Testimony, which PG&amp;E ultimately stipulated to in the Joint Parties Stipulations.</p> <p>TURN also called into question PG&amp;E's cost estimate for the electrification project in Ex. TURN-03. PG&amp;E modified its electrification cost estimate several times, and ultimately, PG&amp;E stipulated to there being significant uncertainty in the cost estimate.</p> <p>In Ex. TURN-01, TURN-02, and TURN-03, TURN recommended a project cost cap tied to TURN's cost estimate for the gas pipeline replacement program, to ensure ratepayer neutrality from the electrification project, with any additional costs funded through the site owner. TURN's final cost cap was \$12.6 million, based on a \$578/mile unit cost. PG&amp;E ultimately stipulated to an even lower cost cap of \$11.267 million, based on its final electrification cost estimate, signaling PG&amp;E's willingness to be bound by its estimate, despite uncertainties.</p>	<ul style="list-style-type: none"><li>Joint Parties Stipulations, # 30</li></ul> <p><i>Electrification Project Cost-Effectiveness Evaluation</i></p> <ul style="list-style-type: none"><li>Ex. TURN-01, pp. 1-2; TURN-02, pp. 2-4</li></ul> <p><i>Data Collection and Reporting</i></p> <ul style="list-style-type: none"><li>Ex. TURN-01, p. 2; Ex. TURN-02, p. 6; Ex. TURN-03, pp. 2, 8</li><li>Joint Parties Stipulations #40, 42 (data collection and reporting requirements); #37-39 (indoor air quality monitoring)</li></ul> <p><i>Cost Recovery</i></p> <ul style="list-style-type: none"><li>TURN Protest, pp. 3, 6-7; Ex. TURN-01, pp. 7-16; Ex. TURN-02, pp. 5-6; Ex. TURN-03, pp. 7-8</li></ul>	
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<p>In Ex. TURN-01 and Ex. TURN-02, TURN addressed PG&amp;E's methodology for determining electrification project cost-effectiveness. TURN raised concerns with PG&amp;E's NPV analysis and also agreed with other intervenors that a PVRR analysis most closely reflects the project impact on utility ratepayers. Parties were unable to reach consensus on the best methodology for assessing electrification project cost-effectiveness, a cautionary tale for future zonal electrification projects.</p> <p>In Ex. TURN-01, Ex. TURN-02, and Ex. TURN-03, TURN addressed the importance of meaningful data collection and reporting to inform future zonal electrification projects. TURN specifically urged the inclusion of pre- and post-electrification participant bill impacts. TURN also supported calls by other intervenors for indoor air quality monitoring, but cautioned that such monitoring should be conducted by a qualified environmental consulting firm and paid for through PG&amp;E's RD&amp;D funds or third-party funding. PG&amp;E ultimately agreed to collect many data points recommended by intervenors, including bill impacts, for inclusion in a Final Project Report. PG&amp;E also agreed to propose the use of \$50,000 in RD&amp;D funding for third-party indoor air quality monitoring and seek contributions to cost from third parties. These efforts by TURN and other parties to develop data collection and reporting requirements can benefit future zonal electrification projects.</p> <p>The most contentious issue in this proceeding was cost recovery, which offers a lesson in itself. TURN demonstrated in its protest and all three volumes of testimony why the</p>		
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<p>Commission should reject PG&amp;E’s request for regulatory asset treatment for behind-the-meter (BTM) project costs on a policy basis. TURN also provided analysis comparing the impact on ratepayers of treating BTM costs as O&amp;M expense versus a regulatory asset, which showed better electrification project economics without regulatory asset treatment. Parties did not reach agreement on cost recovery issues, which underscores the importance of Commission resolution of this issue to allow stakeholders to focus on other aspect of zonal electrification in the future.</p> <p>The Commission recently recounted the California Court of Appeal’s interpretation of the intervenor compensation statutes in <i>New Cingular Wireless II</i>. As the Commission explained in D.25-12-045:</p> <p>“The <i>New Cingular Wireless II</i> court states that to show a substantial contribution: “[B]y the plain terms of the statute there must be some demonstrable link between a position the intervenor took and a specific ‘order or decision’ adopted by the CPUC.” (<i>New Cingular Wireless II</i>, <i>supra</i>, 21 Cal.App.5th at 1203.) The Public Utilities Code thus provides for compensation where the intervenor made a substantial contribution, in whole or in part, to the Commission’s order or decision (section 1803(a)). <i>New Cingular Wireless I</i> states that awards may be made based on procedural recommendations as well. (<i>New Cingular Wireless I</i>, <i>supra</i>, 246 Cal.App.4th at 819.)” [D.25-12-045, p. 4]</p>		
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TURN submits that TURN's analysis and recommendations, coupled with the Joint Parties Stipulations, highlighted above, contributed to the rich record in this proceeding that led the Commission to order in D.25-11-004 that this record be made available for future related proceedings, and the lessons learned by PG&E and other parties be memorialized through a formally filed Lessons Learned report. The Commission should accordingly find a demonstrable link between TURN's work and the Commission's orders in D.25-11-004.		
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**B. Duplication of Effort (§ 1801.3(f) and § 1802.5):**

	<b>Intervenor's Assertion</b>	<b>CPUC Discussion</b>
<b>a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?<sup>2</sup></b>	Yes.	
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	Yes.	
<b>c. If so, provide name of other parties:</b> Indicated Shippers		
<b>d. Intervenor's claim of non-duplication:</b>  Cal Advocates was much less active than TURN in this proceeding. Whereas TURN submitted three volumes of testimony, Cal Advocates offered a single volume, four pages long. Further, there was no overlap between Cal Advocates' recommendations and TURN's. Cal Advocates challenged PG&E's cost allocation entirely to gas customers; recommended a debt rate of return on PG&E's proposed regulatory asset; and suggested the addition of a stakeholder input process. TURN did not oppose allocating costs to gas ratepayers if cost-effective; opposed regulatory asset treatment; and was silent on stakeholder participation.		

<sup>2</sup> The Office of Ratepayer Advocates was renamed the Public Advocate's Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

<p>Indicated Shippers, like TURN, challenged PG&amp;E's cost-effectiveness calculations and the proposed project ratemaking. However, TURN and Indicated Shippers offered complementary analyses on these issues. TURN offered a lower cost cap than Indicated Shippers based on TURN's unique analysis of a reasonable estimate for the gas pipeline project. TURN focused on issues with PG&amp;E's NPV analysis, whereas Indicated Shippers provided a PVRR analysis to determine project cost-effectiveness. TURN supported cost recovery from gas ratepayers if the project was cost-effective (which would be achieved through a cost cap), while Indicated Shippers maintained that gas ratepayers should not pay for the CSU Monterey Bay project.</p> <p>For these reasons, TURN submits that the Commission should find no undue duplication between TURN's participation and that of other parties.</p>	
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**C. Additional Comments on Part II: (use line reference # or letter as appropriate)**

#	Intervenor's Comment	CPUC Discussion

**PART III: REASONABLENESS OF REQUESTED COMPENSATION**

**(to be completed by Intervenor except where indicated)**

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

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**a. Intervenor's claim of cost reasonableness:**

This request seeks an award of \$133,691.88 as the reasonable cost of our participation in this important proceeding. These costs are reasonable in light of the quality of TURN's work and TURN's contributions to this proceeding and the final decision, as document above. Further, as explained in Part III.b below, TURN has voluntarily excluded more than 100 hours of attorney and expert time that TURN devoted to this proceeding in order to keep costs reasonable under the circumstances here, where PG&E withdrew its application before the completion of litigation. TURN submits that the Commission should conclude that TURN's request is reasonable.

**b. Reasonableness of hours claimed:**

TURN requests compensation for approximately 260 hours of attorney and expert time, which covers TURN’s very active participation in this multi-year proceeding. TURN analyzed PG&E’s initial application and testimony and prepared a protest. TURN further analyzed PG&E’s amended testimony required by the Scoping Memo. Then TURN prepared Intervenor and Rebuttal Testimony on 2/17/23 and 3/17/23, respectively. Following PG&E’s restart of this proceeding after a year-long hiatus, TURN analyzed PG&E’s new agreement with CSUMB and supplemental testimony. TURN then submitted Supplemental Intervenor Testimony on 9/30/24, conducted discovery based on PG&E’s rebuttal, participated in further settlement negotiations which resulted in factual stipulations, and otherwise prepared for evidentiary hearings and briefing before PG&E’s decision to seek withdrawal of this application in early January 2025, just days before opening briefs were due.

Over the course of this proceeding, TURN experienced a remarkable amount of staff turnover, which impacted staffing of this proceeding and TURN’s hours.

**TURN Attorneys:** TURN initially assigned senior Staff Attorney Marcel Hawiger to work with more junior Staff Attorney Camille Stough. However, Ms. Stough decided to seek employment elsewhere in the fall of 2022. With Ms. Stough’s departure, TURN assigned junior Staff Attorney Marna Paintsil Anning to work with Mr. Hawiger. Ms. Anning also left TURN during the pendency of this proceeding. While at the helm, Mr. Hawiger prepared TURN’s Testimony and Rebuttal Testimony in 2023. Then Mr. Hawiger left TURN in April 2023 (and subsequently returned, but that history does not impact this claim), around the time that PG&E sought suspension of the schedule. When the proceeding restarted in 2024, TURN assigned Legal Director Thomas Long to lead TURN’s work. Finally, Mr. Long handed this case over to TURN Managing Attorney Hayley Goodson in the fall of 2024 as a matter of reallocating workload. Ms. Goodson saw this proceeding through its surprising and eventful conclusion.

As TURN was developing its positions in this proceeding, TURN General Counsel Robert Finkelstein and Staff Attorney Elise Torres provided very limited assistance to Mr. Hawiger, Ms. Stough, and Ms. Anning. Both Mr. Finkelstein and Ms. Torres had relevant experience addressing ratemaking issues related to PG&E’s regulatory asset proposal for behind-the-meter costs. This claim includes 2.75 hours for Mr. Finkelstein and 1.25 hours for Ms. Torres.

**TURN Analysts:** From the outset of this proceeding, TURN’s various attorneys were assisted by experts, particularly in evaluating PG&E’s cost-effectiveness claims regarding the proposed CSUMB electrification project and otherwise in assessing ratepayer impacts associated with PG&E’s proposals. TURN Energy Policy Analyst Jennifer Dowdell provided in-house support. TURN also received early support from Jalal Awan, who was an outside consultant to TURN at the beginning of this proceeding. Mr. Awan joined TURN’s staff as an Energy & Climate Policy Analyst in late 2023. When Mr. Hawiger left TURN, Mr. Awan assumed the role of TURN’s expert witness and prepared TURN’s Supplemental Intervenor Testimony. Mr. Awan continued to assist TURN’s attorneys in participating in settlement negotiations and preparing for briefing, which TURN very reasonably assumed would take place according to the adopted procedural schedule.

<p><b>Voluntary Reduction in Hours:</b> Understandably, TURN's timesheets included a significant amount of time associated with transitions in staffing. Given this, as well as the proceeding's sudden conclusion without briefing, TURN has voluntarily removed more than 100 hours of attorney and expert time from this claim. TURN submits that the remaining hours are fully reasonable in light of the substantial contributions TURN made in this proceeding and the circumstances here.</p>			
<p><b>c. Allocation of hours by issue:</b></p>			
<p>The following codes relate to the issue and activity areas addressed by TURN in this proceeding.</p>			
Code	Description	Allocation of Time	Hours
Brief	Work related to the common briefing outline required by the Commission	0.51%	1.25
CE	Work related to evaluating the cost-effectiveness of the CSUMB electrification project relative to the alternative gas pipeline replacement project, including cost assumptions and valuation methodologies, like NPV and PVRR	28.92%	71.00
Coord	Work related to external coordination with other parties to inform TURN's efficient and effective participation	2.44%	6.00
CR	Work related to evaluating PG&E's cost recovery proposals, particularly regulatory asset treatment for behind-the-meter costs instead of O&M expense treatment	6.42%	15.75
GP	General work necessary for participation that cannot be allocated by issue	6.62%	16.25
LLR	Work related to the Lessons Learned report ordered by D.25-11-004	2.44%	6.00
PD	Work related to the PD preceding D.25-11-023	0.71%	1.75
Pipe	Work related to PG&E's gas pipeline replacement project that could be avoided by the CSUMB electrification project	3.67%	9.00
Proc	Review of CPUC rulings and time spent preparing for, and participating in the Prehearing Conference, required Meet & Confers and Status Conferences	3.16%	7.75
Restart	Work necessitated by PG&E's request to suspend the procedural schedule pending further negotiations with CSUMB	6.01%	14.75

Allocation of Work by Category				
Sett	Work related to settlement negotiations and the joint parties' factual stipulations filed with the Commission	13.03%	32.00	
Test	Work related to TURN's testimony that cannot be accurately allocated to one of the specific issue areas, as well as reviewing other parties' testimony	15.38%	37.75	
Withdraw	Work related to PG&E's decision to withdraw its application	10.69%	26.25	
<b>SUBTOTAL</b>	(excluding compensation-related time)	<b>100.00%</b>	<b>245.50</b>	
Comp	Work related to preparing TURN's notice of intent to claim compensation and this request for intervenor compensation.		15.25	
<b>TOTAL</b>			<b>260.75</b>	

TURN submits that under the circumstances this information should suffice to address the allocation requirement under the Commission's rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.

**B. Specific Claim:\***

CLAIMED					CPUC AWARD			
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Camille Stough, TURN Attorney	2022	11.75	\$380.00	D.23-10-017	\$ 4,465.00			
Elise Torres, TURN Attorney	2023	1.25	\$510.00	D.24-01-045	\$ 637.50			
Hayley Goodson, TURN Attorney	2024	14.00	\$680.00	D.24-09-017	\$ 9,520.00			
Hayley Goodson, TURN Attorney	2025	17.50	\$705.00	D.25-07-034	\$ 12,337.50			
Hayley Goodson, TURN Attorney	2026	2.25	\$730.00	See Comment #1	\$ 1,642.50			
Jalal Awan, TURN Energy Policy Analyst	2024	92.25	\$325.00	See Comment #3	\$ 29,981.25			

CLAIMED						CPUC AWARD					
Jalal Awan, TURN Energy Policy Analyst	2025	11.75	\$355.00	See Comment #3	\$ 4,171.25						
Jalal Awan, TURN Energy Policy Analyst	2026	2.50	\$365.00	See Comment #3	\$ 912.50						
Jennifer Dowdell, TURN Energy Policy Expert	2022	4.00	\$415.00	D.23-04-022	\$ 1,660.00						
Marcel Hawiger, TURN Attorney	2022	20.25	\$670.00	D.23-03-042	\$ 13,567.50						
Marcel Hawiger, TURN Attorney	2023	35.50	\$735.00	D.23-10-017	\$ 26,092.50						
Consultant - Marcel Hawiger	2026	1.25	\$250.00	Consultant billed rate. See Comment #2	\$ 312.50						
Marna Paintsil Anning, TURN Attorney	2022	6.00	\$275.00	D.23-11-120	\$ 1,650.00						
Robert Finkelstein, TURN General Counsel	2022	2.25	\$805.00	D.23-04-022	\$ 1,811.25						
Robert Finkelstein, TURN General Counsel	2023	0.50	\$840.00	D.24-02-040	\$ 420.00						
Thomas J. Long, TURN Director of Legal Strategy	2024	22.50	\$860.00	D.24-09-016	\$ 19,350.00						
<i><b>Subtotal: \$128,531.25</b></i>						<i><b>Subtotal: \$</b></i>					
<b>OTHER FEES</b>											
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):											
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$			
<i><b>Subtotal: \$</b></i>						<i><b>Subtotal: \$</b></i>					

CLAIMED						CPUC AWARD					
INTERVENOR COMPENSATION CLAIM PREPARATION **											
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$			
Hayley Goodson, TURN Attorney	2026	13.25	\$365.00	50% of 2026 Rate; See Comment #1	\$ 4,836.25						
Marcel Hawiger, TURN Attorney	2022	0.25	\$335.00	50% of 2022 Rate	\$ 83.75						
Marna Paintsil Anning, TURN Attorney	2022	1.75	\$137.50	50% of 2022 Rate	\$ 240.63						
<b>Subtotal: \$5,160.63</b>						<b>Subtotal: \$</b>					
COSTS											
#	Item	Detail			Amount	Amount					
1.											
2.											
<b>Subtotal: \$</b>						<b>Subtotal: \$</b>					
<b>TOTAL REQUEST: \$133,691.88</b>						<b>TOTAL AWARD: \$</b>					

\*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

#### ATTORNEY INFORMATION

Attorney	Date Admitted to CA BAR <sup>3</sup>	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Camille Stough	June 2016	309555	No
Elise Torres	December 2011	280443	No
Hayley Goodson	December 2003	228535	No
Marcel Hawiger	January 1998	194244	No

<sup>3</sup> This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

CLAIMED			CPUC AWARD
Marna Paintsil Anning	December 2021	339228	No
Robert Finkelstein	June 1990	146391	No
Thomas Long	December 1986	124776	No

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

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Timesheets for TURN Attorneys/Experts
Attachment 3	TURN hours allocated by issue
Attachment 4	TURN Feedback on PG&E Draft Lessons Learned Report
Attachment 5	Retainer Agreement with Consultant Marcel Hawiger for 2026 Work
Comment #1	<p><b>2026 Rate for Hayley Goodson</b></p> <p>TURN requests an hourly rate of \$730 for TURN Attorney Hayley Goodson in 2026. The requested rate is equal to the rate authorized by the Commission in D.25-07-034 for Ms. Goodson's work in 2025, \$705, adjusted by an estimated escalation rate of 3.3% for 2026.</p> <p>Calculation: <math>\\$705 \times [1.033 \text{ (est. COLA)}] = \\$728.27</math>, rounded to \$730</p> <p>TURN uses an estimated escalation rate of 3.3% because it is the percentage change in the Bureau of Labor Statistics Employment Cost Index (ECI), Table 5, for the Occupational Group "Management, Professional, and Related excluding Incentive Paid Occupations" for the 12-months ended Sept. 2025, which is the latest information available to TURN. TURN asks the Commission to apply the adopted escalation rate in determining Ms. Goodson's 2026 hourly rate.</p>
Comment #2	<p><b>2026 Rate for TURN Consultant Marcel Hawiger</b></p> <p>Marcel Hawiger was employed by TURN as a Staff Attorney for the majority of time he worked on this proceeding. However, in mid-December 2025, Mr. Hawiger ended his employment with TURN. Since that time, Mr. Hawiger has begun providing consulting services to TURN at an hourly rate of \$250, which is far below the Market Rates approved by the Commission for his work as a TURN Staff Attorney over many years.</p>

<b>Attachment or Comment #</b>	<b>Description/Comment</b>
	<p>This request for compensation includes 1.25 hours of Mr. Hawiger's time in January 2026, preparing feedback on PG&amp;E's draft Lessons Learned report to include in TURN's submission to PG&amp;E. TURN requests an hourly rate of \$250 for this work conducted in 2026. Attachment 5 to this claim includes the retainer agreement between TURN and Mr. Hawiger which specifies this hourly rate for work in 2026.</p>
Comment #3	<p><b>2024, 2025, and 2026 Hourly Rates for TURN Energy &amp; Climate Policy Analyst Jalal Awan</b></p> <p>On October 27, 2025, TURN filed an Intervenor Compensation Claim in R.20-07-013 that included TURN's first request for an hourly rate for TURN Energy Policy Analyst Jalal Awan. Mr. Awan joined TURN's staff in November 2023. In that claim, TURN requested an hourly rate of \$325 for Mr. Awan in 2024 based on the Commission's hourly rate range for the Public Policy Analyst – Level III labor role. TURN refers the Commission to TURN's showing in R.20-07-013 to support the proposed 2024 rate of \$325 for Mr. Awan rather than repeat it here. (See <a href="https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M585/K485/585485920.PDF">https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M585/K485/585485920.PDF</a>)</p> <p>For Mr. Awan's rate in 2025, TURN requests that the Commission adjust his 2024 rate by both (1) the annual escalation rate of 3.46% for 2025 and (2) the first 5% step increase for Mr. Awan in the Public Policy Analyst – Level III experience tier. TURN uses a 2025 rate of \$355 for Mr. Awan to prepare this claim. Calculation: <math>\\$325 \times [1.0346 (\text{COLA}) + 0.05 (\text{step increase})] = \\$352.50</math> rounded to \$355.</p> <p>For Mr. Awan's rate in 2026, TURN requests that the Commission adjust his 2025 rate by the annual escalation rate adopted for 2026. To calculate this claim, TURN uses an estimated escalation rate of 3.3% for 2026, which produces a 2026 rate of \$365.</p> <p>Calculation: <math>\\$355 \times [1.033 (\text{est. COLA})] = \\$366.72</math>, rounded to \$365</p> <p>TURN uses an estimated escalation rate of 3.3% because it is the percentage change in the Bureau of Labor Statistics Employment Cost Index (ECI), Table 5, for the Occupational Group "Management, Professional, and Related excluding Incentive Paid Occupations" for the 12-months ended Sept. 2025, which is the latest information available to TURN. TURN asks the Commission to apply the adopted escalation rate in determining Mr. Awan's 2026 hourly rate.</p>

**D. CPUC Comments, Disallowances, and Adjustments (*CPUC completes*)**

Item	Reason

**PART IV: OPPOSITIONS AND COMMENTS**

Within 30 days after service of this Claim, Commission Staff  
or any other party may file a response to the Claim (see § 1804(c))

<b>A. Opposition: Did any party oppose the Claim?</b>	
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If so:

Party	Reason for Opposition	CPUC Discussion

<b>B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?</b>	
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If not:

Party	Comment	CPUC Discussion

*(Green items to be completed by Intervenor)*

**FINDINGS OF FACT**

1. The Utility Reform Network [has/has not] made a substantial contribution to **D.25-11-004**.

2. The requested hourly rates for **The Utility Reform Network**'s representatives [, as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [, as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$\_\_\_\_\_.

### **CONCLUSION OF LAW**

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Pub. Util. Code §§ 1801-1812.

### **ORDER**

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

This decision is effective today.

Dated \_\_\_\_\_, at San Francisco, California.

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

<b>Compensation Decision:</b>		<b>Modifies Decision?</b>	
<b>Contribution Decision(s):</b>	D.25-11-004		
<b>Proceeding(s):</b>	A.22-08-003		
<b>Author:</b>			
<b>Payer(s):</b>			

**Intervenor Information**

<b>Intervenor</b>	<b>Date Claim Filed</b>	<b>Amount Requested</b>	<b>Amount Awarded</b>	<b>Multiplier?</b>	<b>Reason Change/Disallowance</b>
The Utility Reform Network	1/23/26	\$133,691.88		N/A	

**Hourly Fee Information**

<b>First Name</b>	<b>Last Name</b>	<b>Attorney, Expert, or Advocate</b>	<b>Hourly Fee Requested</b>	<b>Year Hourly Fee Requested</b>	<b>Hourly Fee Adopted</b>
Camille	Stough	Attorney	\$380.00	2022	
Elise	Torres	Attorney	\$510.00	2023	
Hayley	Goodson	Attorney	\$680.00	2024	
Hayley	Goodson	Attorney	\$705.00	2025	
Hayley	Goodson	Attorney	\$730.00	2026	
Marcel	Hawiger	Attorney	\$670.00	2022	
Marcel	Hawiger	Attorney	\$735.00	2023	
Marcel	Hawiger	Attorney - Consultant	\$250.00	2026	
Marna	Paintsil Anning	Attorney	\$275.00	2022	
Robert	Finkelstein	Attorney	\$805.00	2022	
Robert	Finkelstein	Attorney	\$840.00	2023	
Thomas	Long	Attorney	\$860.00	2024	

Revised March 2023

Jennifer	Dowdell	Expert	\$415.00	2022	
Jalal	Awan	Expert	\$325.00	2024	
Jalal	Awan	Expert	\$355.00	2025	
Jalal	Awan	Expert	\$365.00	2026	

**(END OF APPENDIX)**

**Attachment 1**  
**Certificate of Service**

(Filed electronically as a separate document pursuant to Rule 1.13(b)(iii))  
(Served electronically as a separate document pursuant to Rule 1.10(c))

**Attachment 2**

Timesheets for TURN Attorneys/Experts

**A.22-08-003 (PGE CSUMB) TURN Compensation Claim**  
**Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Marcel Hawiger	A22-08-003	GP	Skim application, testimony, notes from mtg w/ PG&E to write internal memo re issues for protest	9/1/22	0.75
Camille Stough	A22-08-003	GP	Read application and testimony	9/2/22	1.00
Marcel Hawiger	A22-08-003	CE	Close read of testimony ch. 1 and 3	9/2/22	0.5
Marcel Hawiger	A22-08-003	Pipe	write protest section re pipe replacement need	9/2/22	1.25
Marcel Hawiger	A22-08-003	Pipe	write DR 001 re. pipe data and replacement	9/2/22	0.75
Robert Finkelstein	A22-08-003	CR	Initial review of Ch. 3 and 4 of testimony to draft e-mail memo to CStough and MHawiger re: potential protest issues on Ch. 3 and 4	9/4/22	1.25
Camille Stough	A22-08-003	GP	Strategize on issues for protest	9/6/22	0.50
Camille Stough	A22-08-003	GP	Continue to read testimony	9/6/22	1.50
Camille Stough	A22-08-003	Pipe	Review data request 001 to PG&E on pipeline replacements	9/6/22	0.25
Robert Finkelstein	A22-08-003	CR	Further review of Ch. 3 and 4 to draft additional thoughts for CStough and MHawiger	9/6/22	1.00
Marcel Hawiger	A22-08-003	GP	T/c mtg w/ Bob and Camille re issues for protest, schedule, staffing of case	9/7/22	0.75
Camille Stough	A22-08-003	GP	Read testimony and strategize on protest	9/8/22	1.50
Camille Stough	A22-08-003	GP	Draft protest	9/9/22	5.00
Marcel Hawiger	A22-08-003	GP	T/c mtg w/ Jalal re issues in case	9/9/22	0.25
Marcel Hawiger	A22-08-003	GP	Read PG&E Testimony ch. 2 (costs), 3 (NPV analysis) and 4 (cost recovery)	9/9/22	0.50
Marcel Hawiger	A22-08-003	GP	Close edits of Camille's protest	9/9/22	1.25
Camille Stough	A22-08-003	GP	Review protest and compile attachments	9/12/22	2.00
Marcel Hawiger	A22-08-003	Proc	Read ALJ Ruling of 9/16/22 re PHC	9/19/22	0.25
Marcel Hawiger	A22-08-003	CE	Discuss assistance with NPV analysis with Jenn and Jalal	9/20/22	0.25
Marcel Hawiger	A22-08-003	GP	Read all protests and responses on docket card; take notes re. issues	9/20/22	0.75
Marcel Hawiger	A22-08-003	Pipe	Review data responses to DR 001	9/20/22	0.25
Marcel Hawiger	A22-08-003	Coord	T/c mtg w/ NRDC re issues in case	9/21/22	0.50
Marcel Hawiger	A22-08-003	Pipe	Write DR 002 - Qs re. various leak and pipe data related to fusion failures	9/23/22	0.75
Marcel Hawiger	A22-08-003	Pipe	Write DR 002 - Qs re. RRQs w/o reg asset; various leak and pipe data related to fusion failures	9/23/22	0.75
Marcel Hawiger	A22-08-003	Proc	All party M&C in advance of PHC per ALJ Ruling of 9/16	9/27/22	0.75
Marcel Hawiger	A22-08-003	Proc	Prep for M&C (review protests; review data requests; review ALJ Ruling)	9/27/22	0.25
Jennifer Dowdell	A22-08-003	CE	Discussion w/ Jalal re NPV	9/28/22	0.25
Jennifer Dowdell	A22-08-003	CE	Review and analyze PG&E testimony and NPV	9/28/22	2.00
Jennifer Dowdell	A22-08-003	CE	Discussion w/ Jalal and attorney MH regarding issues for DR and transmittal of notes to meeting participants	9/29/22	0.75
Jennifer Dowdell	A22-08-003	CE	prepare post-mtg notes to meeting participants re NPV of RRQ analyses assumptions	9/29/22	0.25
Marcel Hawiger	A22-08-003	CE	T/C mtg w/ jalal and jenn to discuss issues re. NPV of RRQ analyses assumptions	9/29/22	0.75
Marcel Hawiger	A22-08-003	Proc	Prep for PHC (review protest; write responses to ALJ questions; review application)	9/29/22	0.50
Marcel Hawiger	A22-08-003	Proc	Attend PHC re scope, schedule and ALJ questions	9/29/22	1.75
Jennifer Dowdell	A22-08-003	CE	prepare comments and edits for jalal to DR for costs and NPV information	10/3/22	0.75
Marcel Hawiger	A22-08-003	CE	research to continue developing next DR re costs, NPV analysis	10/4/22	2.00
Marcel Hawiger	A22-08-003	CE	TC mtg w/ jalal re next DR re costs, NPV analysis	10/4/22	0.25
Marcel Hawiger	A22-08-003	CR	T/c mtg w/ Marna re reg asset research	10/11/22	0.25
Marna P. Anning	A22-08-003	CR	Research on Regulatory Asset treatment	10/13/22	3.00
Marcel Hawiger	A22-08-003	Pipe	Skim PG&E responses to DR 002 re pipeline and fitting leaks	10/14/22	0.25
Marcel Hawiger	A22-08-003	GP	Review and complete NDA; NDC	10/19/22	0.25
Marna P. Anning	A22-08-003	CR	Continued research on CPUC cases of regulatory asset treatment for behind the meter projects	10/19/22	3.00
Marcel Hawiger	A22-08-003	CR	T/c mtg w/ Marna re reg asset discovery issues	10/24/22	0.25
Marcel Hawiger	A22-08-003	GP	work with TURN team on NDA/DNC execution	10/24/22	0.25
Marcel Hawiger	A22-08-003	Comp	Review and Finalize NOI	10/26/22	0.25
Marna P. Anning	A22-08-003	Comp	Initial drafting of TURN Notice of Intent for Intervenor Comp (NOI)	10/26/22	1.75
Marcel Hawiger	A22-08-003	CE	Review data responses to DR 002 and 003	11/16/22	0.50
Marcel Hawiger	A22-08-003	Coord	write email to PAO re reg asset analysis	11/17/22	0.25
Marcel Hawiger	A22-08-003	CR	Review Jalal reg asset analysis	11/17/22	0.25
Marcel Hawiger	A22-08-003	Sett	Attend all-party sett mtg re issues	11/17/22	0.50
Marcel Hawiger	A22-08-003	CE	Review responses to DR 003	12/5/22	0.25
Marcel Hawiger	A22-08-003	Proc	Close read of Scoping Memo of 11-22-2022	12/5/22	0.25
Marcel Hawiger	A22-08-003	CE	Review Jalal's NPV analyses to write internal memo	12/9/22	0.25
Marcel Hawiger	A22-08-003	Coord	Mtg w/ TURN and PAO to discuss all issues in case, esp NPV and reg asset	12/13/22	1.00
Marcel Hawiger	A22-08-003	Sett	Read through PG&E's position summary; outline TURN positions	1/12/23	0.50
Marcel Hawiger	A22-08-003	Sett	Internal emails re sett position to inform email to PG&E summarizing TURN positions re settlement document	1/18/23	0.75
Marcel Hawiger	A22-08-003	Sett	Attend all-party first sett meeting	1/18/23	0.75
Marcel Hawiger	A22-08-003	Coord	T/C mtg w/ Indicated Shippers to discuss NPV analysis and reg asset issue	1/26/23	0.50
Marcel Hawiger	A22-08-003	Coord	write f/u email re Indicated Shippers memo re TURN NPV analysis	1/26/23	0.25
Marcel Hawiger	A22-08-003	CE	Write DR 04 re dedicated pipeline issue and customer contribution	1/30/23	0.75
Marcel Hawiger	A22-08-003	CR	Research re. reg asset treatment	1/30/23	0.50
Marcel Hawiger	A22-08-003	Test	Outline testimony	1/30/23	0.50
Marcel Hawiger	A22-08-003	Coord	Zoom mtg w/ TURN and IS to discuss PG&E's NPV analysis of gas v. elec and concerns re assumptions	2/3/23	0.75
Marcel Hawiger	A22-08-003	CR	Additional research re. reg asset treatment	2/6/23	0.50
Marcel Hawiger	A22-08-003	CR	Draft testimony re. cost recovery and reg asset treatment	2/6/23	1.00
Marcel Hawiger	A22-08-003	CR	Resarch re. MHP D.14-03-021 and bases for reg asset treatment	2/8/23	0.75
Marcel Hawiger	A22-08-003	CR	Write testimony re reg asset	2/10/23	1.25
Marcel Hawiger	A22-08-003	Test	Write all sections of testimony	2/13/23	2.75
Marcel Hawiger	A22-08-003	Test	Write testimony on all issues (cost recovery, reg asset, NPV analysis, ratepayer impacts)	2/16/23	5.75
Marcel Hawiger	A22-08-003	Test	Continue writing testimony (review exhibits; finalize all sections of testimony; create tables; complete citations; compile attachments)	2/17/23	6.00
Marcel Hawiger	A22-08-003	Test	Read testimonies of CUE, EDF, IS, NRDC/SC, PAO and reports cited by NRDC/SC	2/28/23	1.75
Marcel Hawiger	A22-08-003	Pipe	Re. gas project costs - review responses to DR 05 and review ch 2 WP	3/2/23	0.50
Marcel Hawiger	A22-08-003	Pipe	Re. gas project costs - write email to PG&E re. Phase 2 costs	3/2/23	0.25
Marcel Hawiger	A22-08-003	Pipe	Write DR 06 re regulator station Phase 1 costs	3/2/23	0.50
Marcel Hawiger	A22-08-003	Test	Start drafting rebuttal testimony	3/2/23	0.75
Marcel Hawiger	A22-08-003	CE	Continue writing rebuttal testimony re costs	3/6/23	0.75

**A.22-08-003 (PGE CSUMB) TURN Compensation Claim**  
**Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Marcel Hawiger	A22-08-003	CR	Continue writing rebuttal testimony cost recovery	3/6/23	0.50
Marcel Hawiger	A22-08-003	CE	Analyze financial recommendations from other intervenors for rebuttal testimony re costs	3/7/23	0.75
Marcel Hawiger	A22-08-003	CR	Analyze financial recommendations from other intervenors for rebuttal testimony re cost recovery	3/7/23	0.50
Marcel Hawiger	A22-08-003	Test	Write rebuttal testimony re data collection	3/7/23	0.75
Marcel Hawiger	A22-08-003	Test	Finish writing all sections; complete citations	3/7/23	0.75
Marcel Hawiger	A22-08-003	Pipe	Incorporate DR 006 responses in to testimony; final review and corrections to testimony	3/16/23	1.50
Marcel Hawiger	A22-08-003	Sett	Attend M&C re settlement	3/23/23	0.50
Marcel Hawiger	A22-08-003	Proc	Read Status Report filed 4/4	4/5/23	0.25
Marcel Hawiger	A22-08-003	Sett	Close review of PG&E sett offer of 3/31	4/5/23	0.25
Marcel Hawiger	A22-08-003	CR	read portion of Decision in R.19-09-009 re cost recovery for microgrid BTM investments	4/6/23	0.50
Marcel Hawiger	A22-08-003	Sett	Write email to all non-IOU parties re response to PG&E offer	4/6/23	0.50
Robert Finkelstein	A22-08-003	Sett	Draft e-mail memo to TURN attys re: settlement strategies, treatment of reg asset element of proposal	4/6/23	0.50
Marcel Hawiger	A22-08-003	Sett	Intervenor sett mtg to discuss response to PG&E	4/7/23	0.50
Elise Torres	A22-08-003	CR	review EV charging decisions RE cost recovery to draft memo to MA & MH	4/10/23	0.75
Elise Torres	A22-08-003	CR	meet with MA & MH RE EV charging decisions RE cost recovery and implications for proceeding	4/11/23	0.50
Marcel Hawiger	A22-08-003	Sett	Mtg w/ Marna and Elise re. regulatory asset issue	4/11/23	0.50
Thomas Long	A22-08-003	Restart	Rev recent emails re revised CSUMB agreement from PGE	6/4/24	0.25
Thomas Long	A22-08-003	Restart	Prep email to PGE re meeting to discuss new agrmt with CSUMB	6/4/24	0.25
Thomas Long	A22-08-003	Restart	Meet w/A. Ward re revised agrmt between PG&E and CSUMB	6/5/24	0.50
Thomas Long	A22-08-003	Test	Prep email to Jalal re next steps for analysis for upcoming intervenor supplemental testimony	6/7/24	0.25
Thomas Long	A22-08-003	Restart	Prep email to JA re testimony schedule	6/10/24	0.25
Thomas Long	A22-08-003	Restart	Prep email to parties re schedule proposals	6/11/24	0.50
Thomas Long	A22-08-003	Restart	Prep email to PGE re its proposed schedule	6/12/24	0.25
Thomas Long	A22-08-003	Restart	Emails to Cal Adv, PGE re schedule	6/14/24	0.25
Jalal Awan	A22-08-003	Restart	Review additional documents for CSU Monterey Bay PG&E electrification project	6/15/24	3.50
Thomas Long	A22-08-003	Restart	Prep email to PGE re revised proposed schedule	6/17/24	0.25
Jalal Awan	A22-08-003	Test	Review Marcel's rebuttal review for CSU Monterey Bay PG&E Zonal Electrification Project in preparation for supplemental testimony	7/10/24	3.00
Jalal Awan	A22-08-003	Restart	Site Visit to CSUMB campus	7/29/24	8.00
Thomas Long	A22-08-003	Restart	Rev/analyze PGE suppl testimony	8/8/24	0.75
Jalal Awan	A22-08-003	CE	Research & draft follow-up Data Request 1 on CSUMB site visit re: lifecycle costs of gas appliances	8/9/24	3.00
Thomas Long	A22-08-003	CE	Rev/edit JA draft DRs	9/3/24	1.00
Thomas Long	A22-08-003	CE	Prep DR #7	9/4/24	0.50
Jalal Awan	A22-08-003	CE	Review and analyze CSU Monterey Zonal Electrification - PG&E's Response to TURN_007 Q002, 003, 005 and take notes for testimony	9/10/24	2.50
Jalal Awan	A22-08-003	CE	Review and analyze PG&E's Data Response to TURN_007 Q008, Q010 and draft notes for testimony	9/12/24	2.50
Thomas Long	A22-08-003	Test	Discuss testimony strategy w/JA	9/12/24	0.25
Jalal Awan	A22-08-003	CE	Review and analyze CSU Monterey Zonal Electrification - PG&E's Responses to TURN_007 Q001, Q004, Q006, Q014 and draft notes for testimony.	9/13/24	2.50
Jalal Awan	A22-08-003	CE	Review and analyze CSU Monterey Zonal Electrification - PG&E's Response to TURN_007 Q009Rev01, Q013 for key issues and take notes.	9/13/24	2.50
Jalal Awan	A22-08-003	CE	Draft Data Request for clarification on PG&E's response to TURN_007 and prepare notes for internal discussion.	9/13/24	1.50
Jalal Awan	A22-08-003	CE	Draft TURN's 8th data for Present Value (PV) analysis	9/16/24	2.50
Jalal Awan	A22-08-003	CE	Prepare and review NPV analysis and NPV of Revenue Requirements for the upcoming CSUMB Testimony.	9/17/24	4.00
Jalal Awan	A22-08-003	Coord	Discuss with EDF the "Summary of Project Net Benefits" from PG&E's latest amended testimony, focusing on economic and environmental impacts.	9/17/24	1.50
Thomas Long	A22-08-003	Test	Meet w/JA re strategy for TURN testimony	9/17/24	0.25
Thomas Long	A22-08-003	CE	Rev/edit JA draft DR 8	9/18/24	0.50
Jalal Awan	A22-08-003	CE	Conduct NPV (Net Present Value) analysis and review Revenue Requirements to prepare for the CSUMB Application Testimony.	9/19/24	2.50
Jalal Awan	A22-08-003	CE	Perform sensitivity analysis for the estimated impacts over 15 years versus 20 years on the lifecycle of electric appliances for potential use in testimony.	9/19/24	1.50
Jalal Awan	A22-08-003	CE	Preprocess data to compare NPV under regulatory versus non-regulatory treatment of appliances for use in testimony.	9/19/24	1.50
Jalal Awan	A22-08-003	CE	Review findings from the recent site visit and draft detailed notes to identify potential issues or confirmations that could influence testimony.	9/19/24	2.00
Jalal Awan	A22-08-003	CE	Evaluate the issue related to electrification unit costs using the TECH dataset and take notes for testimony.	9/20/24	3.00
Jalal Awan	A22-08-003	CE	Assess the distribution of electrification incentives for electric HPWHs using the TECH dataset and take notes for testimony.	9/20/24	3.50
Jalal Awan	A22-08-003	CE	Adjust the gas forecast downward based on actual unit costs recorded, and increase electric cost forecasts in response to findings from the TECH dataset and add resulting graphs in testimony.	9/20/24	2.00
Jalal Awan	A22-08-003	CE	Conduct a revised benefit-cost analysis incorporating the new cost data and evaluate how these revisions impact the overall cost-effectiveness of the project compared to PG&E's previous calculations, and add resulting graphs in testimony.	9/23/24	1.50
Jalal Awan	A22-08-003	Test	Review Marcel's testimony related to TURN-01 and TURN-02 to identify and document any issues or significant points highlighted in earlier testimony.	9/23/24	4.00
Jalal Awan	A22-08-003	Test	Write testimony based on data analysis to-date and findings from TURN's previous filings.	9/23/24	1.50
Thomas Long	A22-08-003	Test	Rev/edit JA draft testimony	9/26/24	2.25
Thomas Long	A22-08-003	Test	Meet w/JA draft testimony	9/26/24	1.00
Thomas Long	A22-08-003	Test	Edit JA revised testimony	9/29/24	2.50
Thomas Long	A22-08-003	Test	Discuss issues re revised testimony w/JA	9/29/24	0.25
Jalal Awan	A22-08-003	Test	Review and revise final testimony on CSUMB Building Decarbonisation.	9/30/24	2.00
Thomas Long	A22-08-003	Test	Rev/edit revised JA draft	9/30/24	1.50

**A.22-08-003 (PGE CSUMB) TURN Compensation Claim**  
**Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Jalal Awan	A22-08-003	CE	Review and analyze NPV analysis sections of Indicated Shippers' Supplemental Testimony, and perform alternative analyses based on IS assumptions.	10/1/24	2.50
Jalal Awan	A22-08-003	CE	Research re net present value analysis, use of various assumptions, and impact of depreciation timelines - included as part of TURN's critique of PG&E's NPV analysis.	10/11/24	1.00
Jalal Awan	A22-08-003	CE	Review, analyze and recalculate NPV cash flow calculations with latest data, and share notes w/ attorney (Tom Long) to inform settlement discussions	10/14/24	2.00
Hayley Goodson	A22-08-003	Sett	meeting with Jalal to discuss TURN's recs and possible issues to pursue in M&C next week	10/15/24	0.50
Jalal Awan	A22-08-003	Sett	Check-in with Hayley on CSUMB decarbonisation settlement.	10/15/24	0.50
Jalal Awan	A22-08-003	CE	Review and analyze CSU Monterey Zonal Electrification - PG&E's Response to TURN_007 and take notes for brief or settlement	10/16/24	1.00
Jalal Awan	A22-08-003	Sett	Prepare for and participate in CSUMB - Meet and Confer	10/17/24	2.50
Jalal Awan	A22-08-003	CE	Review and analyze PG&E's rebuttal and draft notes for potential inclusion in brief or settlement	10/21/24	2.00
Hayley Goodson	A22-08-003	CE	review memo from Jalal reacting to PG&E's rebuttal and provide feedback re litigation risk and strategy for M&C	10/22/24	1.00
Hayley Goodson	A22-08-003	CE	review add'l info from Jalal to inform analysis of strength of PG&E's rebuttal testimony in preparation for M&C	10/23/24	0.25
Hayley Goodson	A22-08-003	Sett	participate in M&C	10/24/24	1.00
Jalal Awan	A22-08-003	CE	Perform sensitivity analysis for the estimated impacts over 5 years versus 10 years on the lifecycle of electric appliances for potential use in briefing in settlement or briefing	10/24/24	2.00
Jalal Awan	A22-08-003	CE	Draft TURN Data Request Set 9 on NPV and PVRR analyses.	10/24/24	2.00
Jalal Awan	A22-08-003	CE	Review PG&E's erroneous upper quartile calculations for remediation costs to draft DR for clarification	10/25/24	0.75
Thomas Long	A22-08-003	CE	Rev JA summary, emails re analysis of PGE rebuttal	10/25/24	0.50
Hayley Goodson	A22-08-003	CE	review Jalal's draft DR 9 on PG&E's rebuttal testimony and communicate with PG&E re same	10/28/24	0.25
Thomas Long	A22-08-003	Sett	Review notes from M&C from JA, HG	10/28/24	0.50
Thomas Long	A22-08-003	Sett	Prep email to JA re prep for next M&C/ stlmt mtg	10/28/24	0.25
Thomas Long	A22-08-003	Sett	Analysis of party positions for M&C	10/28/24	0.50
Thomas Long	A22-08-003	Sett	Call w/ PGE (A.Ward) re M&C issues	10/28/24	0.50
Thomas Long	A22-08-003	Sett	Discuss M&C strategy w/HG	10/28/24	0.25
Jalal Awan	A22-08-003	Sett	Check-in with Tom on CSUMB other parties' positions and TURN's potential alignment.	10/29/24	1.00
Thomas Long	A22-08-003	Sett	Analysis re PGE proposed stip, stlmt offer for M&C	10/29/24	1.25
Thomas Long	A22-08-003	Sett	Meet w/JA to prep for M&C	10/29/24	1.00
Thomas Long	A22-08-003	Sett	Rev EDF edits to PGE proposed stip	10/29/24	0.25
Thomas Long	A22-08-003	Sett	Rev PGE revised stips	10/29/24	0.25
Thomas Long	A22-08-003	Sett	Meet w/EPUC-IS re positions for M&C	10/30/24	0.75
Thomas Long	A22-08-003	Sett	Participate in M&C	10/30/24	1.50
Jalal Awan	A22-08-003	CE	Review & analyze responses to PG&E's Response to TURN_009 Q003, and prepare analysis / plots for inclusion in briefing or to inform settlement	10/31/24	3.50
Jalal Awan	A22-08-003	Pipe	Analyze the revised position on the gas pipeline cost cap, reducing it from \$578/ft to \$397/ft based on the actual cost of plastic pipeline replacement for 9,846 feet of pipeline as reported by PG&E in TURN-007-Q08, and included in TURN-03 (TURN's rebuttal).	10/31/24	2.00
Jalal Awan	A22-08-003	Sett	Discuss draft stipulations on electrification vs. gas revised costs with attorney, and provide feedback in writing.	10/31/24	1.00
Thomas Long	A22-08-003	Proc	Rev PGE draft M&C report to CPUC	10/31/24	0.25
Jalal Awan	A22-08-003	Sett	Review and analyze previous decision D.06-07-027 to assess benefit-cost and present value analysis assumptions to assess settlement proposals	11/1/24	3.50
Jalal Awan	A22-08-003	Sett	Review PG&E cost recovery proposal and conduct three sensitivity analyses for Hayley for settlement discussions.	11/1/24	0.50
Jalal Awan	A22-08-003	Sett	Discuss and refine the CSUMB model displayed by PG&E during discussions; noted key areas for scrutiny / submitting errata re: Present Value and Benefit-Cost analyses.	11/6/24	2.50
Thomas Long	A22-08-003	Sett	Call w/ PGE re meet and confer issues	11/6/24	1.25
Hayley Goodson	A22-08-003	Sett	Discuss strategy re PG&E stlmt proposal w/ TLAs part of case handoff	11/7/24	0.25
Hayley Goodson	A22-08-003	CE	meeting with Jalal on stipulations and rebuttal DRs needed for briefing	11/12/24	0.25
Hayley Goodson	A22-08-003	Proc	prep for today's status conference	11/12/24	0.50
Hayley Goodson	A22-08-003	Proc	attend status conference	11/12/24	0.75
Hayley Goodson	A22-08-003	CE	confer with Jalal re evidentiary needs for briefing and review DR 9	11/14/24	0.25
Hayley Goodson	A22-08-003	CE	confer with Jalal on stipulations on BCE inc. review analysis provided by Jalal	11/14/24	0.25
Hayley Goodson	A22-08-003	Sett	begin reviewing next draft of PG&E proposed stipulations and provide edits, comments	11/14/24	1.00
Hayley Goodson	A22-08-003	Sett	call with A.Ward /PG&E re stips and potential next steps	11/14/24	0.25
Hayley Goodson	A22-08-003	Sett	confer with PG&E re stip in line of cross	11/14/24	0.25
Hayley Goodson	A22-08-003	Proc	attend meet and confer required by 11/20 ALJ ruling re schedule changes	11/22/24	0.25
Hayley Goodson	A22-08-003	Proc	review and react to PG&E's draft proposed schedule to file on Monday	11/22/24	0.25
Hayley Goodson	A22-08-003	Proc	review PG&E draft status conf report for filing today	11/25/24	0.25
Hayley Goodson	A22-08-003	Proc	prep for today's status conf per ALJ ruling directing parties to address specific issues	11/26/24	0.75
Hayley Goodson	A22-08-003	Proc	attend status conference	11/26/24	0.75
Hayley Goodson	A22-08-003	Sett	mtg with counsel for Indicated Shippers to explore respective positions on ratemaking and factual stipulations	12/3/24	0.50
Hayley Goodson	A22-08-003	Sett	review draft motion to enter stipulated exhibits into evidence from S. Hafez/IS and prepare exhibit TURN-04 to support same	12/5/24	0.25
Hayley Goodson	A22-08-003	Brief	evaluate PG&E draft briefing outline and prepare alternative outline per scoping memo requirement, extent of disputed issues	12/10/24	1.00
Hayley Goodson	A22-08-003	Brief	communicate with IS, PG&E, and other active parties re TURN's proposed briefing outline	12/10/24	0.25
Hayley Goodson	A22-08-003	Sett	evaluate IS proposed changes to PG&E draft stipulations	12/10/24	0.25
Hayley Goodson	A22-08-003	Sett	rsch, draft additional revisions to PG&E's proposed stips (on top of IS revisions)	12/11/24	1.50
Hayley Goodson	A22-08-003	Sett	review PG&E revisions to stipulations and confer with PG&E and other parties re same and additional edits	12/12/24	1.00
Hayley Goodson	A22-08-003	Sett	review near-final versions of motion to admit exhibits and motion re briefing outline and stipulations and provide edits to PG&E	12/13/24	0.25
Hayley Goodson	A22-08-003	Coord	mtg with counsel for PG&E, IS re PG&E developments	1/6/25	0.75
Hayley Goodson	A22-08-003	Withdraw	review PG&E letter withdrawing application	1/7/25	0.25
Hayley Goodson	A22-08-003	Withdraw	review PG&E request for suspension of briefing schedule and respond re same	1/7/25	0.25

**A.22-08-003 (PGE CSUMB) TURN Compensation Claim**  
**Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Jalal Awan	A22-08-003	Withdraw	Review PG&E's Motion to Withdraw from CSUMB pipeline project and draft memo to attorney with suggestions for TURN's response	1/10/25	3.50
Hayley Goodson	A22-08-003	Withdraw	review PG&E withdrawal motion and memo from Jalal re potential responses	1/13/25	0.25
Hayley Goodson	A22-08-003	Withdraw	mtg with Jalal re potential responses to PG&E withdrawal motion and EDF motion re same	1/13/25	0.50
Jalal Awan	A22-08-003	Withdraw	Discuss January 21 responses to EDF/PG&E's Motions w/ attorney	1/13/25	1.50
Hayley Goodson	A22-08-003	Coord	call with Sierra Club/NRDC	1/14/25	0.25
Hayley Goodson	A22-08-003	Coord	f/u call with counsel for Indicated Shippers following M&C	1/15/25	0.25
Hayley Goodson	A22-08-003	Withdraw	work on response to PG&E motn to withdraw - legal rsch re standard of review	1/15/25	0.75
Hayley Goodson	A22-08-003	Withdraw	work on response to PG&E motn to withdraw - draft analysis of PG&E request in light of record evidence	1/15/25	2.50
Hayley Goodson	A22-08-003	Withdraw	attend M&C per Stip 9 - PG&E ending agreement with CSUMB	1/15/25	1.50
Hayley Goodson	A22-08-003	Withdraw	review and revise PG&E's draft status update following today's M&C	1/15/25	0.25
Jalal Awan	A22-08-003	Withdraw	Discuss January 21 responses to EDF/PG&E's Motions w/ attorney HG	1/15/25	0.25
Hayley Goodson	A22-08-003	Withdraw	mtg with Jalal re M&C and plan for response to mttn	1/16/25	0.25
Hayley Goodson	A22-08-003	Withdraw	continue work on response to PG&E motion to withdraw	1/27/25	6.25
Hayley Goodson	A22-08-003	Withdraw	review Jalal's feedback on draft response to PG&E motn	1/28/25	0.25
Hayley Goodson	A22-08-003	Withdraw	call with Jalal to discuss TURN's conditions	1/28/25	0.25
Hayley Goodson	A22-08-003	Withdraw	review and revise draft response to PG&E motn per discussion with Jalal	1/28/25	0.50
Jalal Awan	A22-08-003	Withdraw	Review and provide edits to response to PG&E motion to withdraw.	1/28/25	3.50
Hayley Goodson	A22-08-003	Withdraw	review other party responses to PG&E, EDF motions	2/3/25	0.50
Jalal Awan	A22-08-003	Withdraw	Examine PG&E's reply to parties' responses, citing safety as rationale for motion to withdraw; cross-check leaks/mile data for CSUMB scope	2/7/25	3.00
Hayley Goodson	A22-08-003	Withdraw	review Jalal's analysis of PG&E's reply highlighting safety	2/10/25	0.25
Hayley Goodson	A22-08-003	PD	review op cmts on PD for potential reply cmts	10/20/25	0.25
Hayley Goodson	A22-08-003	PD	draft reply cmts on PD	10/27/25	1.50
Hayley Goodson	A22-08-003	LLR	skim PG&E draft lessons learned report and solicit input from Jalal and Marcel re same	1/11/26	0.25
Jalal Awan	A22-08-003	LLR	Reviewed PG&E's Dec. 23, 2025 draft "Lessons Learned" report and relevant directions on Lessons Learned reporting in D.25-11-004	1/12/26	0.50
Jalal Awan	A22-08-003	LLR	Draft informal comments on PG&E's "Lessons Learned" report, including considerations re: policy, cost, and ratepayer impacts missing in PG&E's draft.	1/12/26	2.00
Consultant - Marcel Hawiger	A22-08-003	LLR	Review PG&E draft report on lessons learned	1/13/26	0.25
Consultant - Marcel Hawiger	A22-08-003	LLR	Review prior testimony and status reports for input on lessons learned draft	1/13/26	0.50
Consultant - Marcel Hawiger	A22-08-003	LLR	Draft input comments on lessons learned draft report	1/13/26	0.50
Hayley Goodson	A22-08-003	LLR	prepare TURN feedback on PG&E draft Lessons Learned report incorporating comments from Marcel and jalal	1/13/26	2.00
Hayley Goodson	A22-08-003	Comp	work on comp request	1/17/26	5.25
Hayley Goodson	A22-08-003	Comp	work on comp request	1/22/26	2.50
Hayley Goodson	A22-08-003	Comp	work on comp request	1/23/26	5.50
<b>Substantial Total</b>					<b>245.50</b>
<b>Comp Total</b>					<b>15.25</b>
<b>Grand Total</b>					<b>260.75</b>

**Attachment 3**

TURN Hours Allocated by Issue

		GP	CE	Pipe	CR	Proc	Coord	Sett	Test	Restart	Brief	Withdraw	PD	LLR	Substantive Hours	Substantive \$\$\$	Comp	Compensation (IComp)	Travel	Compensation (Travel)
		Billing Period	Hourly Rate															1/2 of hourly rate		
Camille Stough	2022	\$380	11.50	-	0.25	-	-	-	-	-	-	-	-	-	11.75	\$ 4,465.00	-	\$ -	\$ -	
Elise Torres	2023	\$510	-	-	-	1.25	-	-	-	-	-	-	-	-	1.25	\$ 637.50	-	\$ -	\$ -	
Hayley Goodson	2024	\$680	-	2.25	-	-	3.50	-	7.00	-	1.25	-	-	-	14.00	\$ 9,520.00	-	\$ -	\$ -	
Hayley Goodson	2025	\$705	-	-	-	-	-	1.25	-	-	-	14.50	1.75	-	17.50	\$ 12,337.50	-	\$ -	\$ -	
Hayley Goodson	2024	\$730	-	-	-	-	-	-	-	-	-	-	-	2.25	2.25	\$ 1,642.50	13.25	\$ 4,836.25	-	\$ -
Jalal Awani	2024	\$325	-	55.25	2.00	-	-	1.50	11.50	10.50	11.50	-	-	-	92.25	\$ 29,981.25	-	\$ -	\$ -	
Jalal Awani	2025	\$355	-	-	-	-	-	-	-	-	-	11.75	-	-	11.75	\$ 4,171.25	-	\$ -	\$ -	
Jalal Awani	2026	\$365	-	-	-	-	-	-	-	-	-	2.50	-	-	2.50	\$ 912.50	-	\$ -	\$ -	
Jennifer Dowdell	2024	\$375	-	-	-	-	-	-	-	-	-	-	-	-	1.00	\$ 662.50	-	\$ -	\$ -	
Marcel Hawiger	2022	\$670	4.75	4.75	4.00	0.75	3.75	1.75	0.50	-	-	-	-	-	20.25	\$ 13,567.50	0.25	\$ 83.75	\$ -	
Marcel Hawiger	2023	\$735	-	2.25	2.75	5.50	0.25	1.50	4.25	19.00	-	-	-	-	35.50	\$ 26,092.50	-	\$ -	\$ -	
Consultant - Marcel Hawiger	2026	\$250	-	-	-	-	-	-	-	-	-	-	-	1.25	1.25	\$ 312.50	-	\$ -	\$ -	
Mama P. Anning	2022	\$275	-	-	-	6.00	-	-	-	-	-	-	-	-	6.00	\$ 1,650.00	1.75	\$ 240.63	\$ -	
Robert Finkelstein	2022	\$805	-	-	-	2.25	-	-	-	-	-	-	-	-	2.25	\$ 1,811.25	-	\$ -	\$ -	
Robert Finkelstein	2023	\$840	-	-	-	-	-	-	0.50	-	-	-	-	-	0.50	\$ 420.00	-	\$ -	\$ -	
Thomas Long	2024	\$860	-	2.50	-	-	0.25	-	8.25	8.25	3.25	-	-	-	22.50	\$ 19,350.00	-	\$ -	\$ -	
<b>TOTAL</b>		16.25	71.00	9.00	15.75	7.75	6.00	32.00	37.75	14.75	1.25	26.25	1.75	6.00	245.50	\$ 128,531.25	15.25	\$ 5,160.63	-	\$ -
<b>TOTAL % HOURS ALLOCATED</b>		6.62%	28.92%	3.67%	6.42%	3.16%	2.44%	13.03%	15.38%	6.01%	0.51%	10.69%	0.71%	2.44%	100.00%					

Substantial Contribution	\$ 128,531.25
Intervenor/Comp Compensation	\$ 5,160.63
Travel/Time Compensation	\$ -
Expense Compensation	\$ -
<b>Grand Total</b>	<b>\$ 133,691.88</b>

**Attachment 4**

**TURN Feedback on PG&E Draft Lessons Learned Report**



Lower bills. Livable planet.

360 Grand Avenue, #150  
Oakland, CA 94610

(415) 929-8876  
**TURN.org**

## **Feedback of The Utility Reform Network (TURN) on PG&E's Draft A.22-08-003 "Lessons Learned" Report**

January 14, 2026

On December 23, 2025, PG&E circulated a draft Lessons Learned report to the active parties in A.22-08-003 pursuant to D.25-11-004, which granted PG&E's motion to withdraw Application 22-08-003. Ordering Paragraph 3 of D.25-11-004 requires PG&E to circulate a draft "lessons learned" report summarizing "policy, cost and ratepayer impacts, and operational experiences" associated with the CSUMB Zonal Electrification Project. Ordering Paragraph 4 requires PG&E to "incorporate party input" and file the "lessons learned" report within 60 days of the issuance of D.25-11-004 in R.24-09-012 and R.19-01-011.

PG&E identifies three lessons learned from A.22-08-003 in its draft Lessons Learned Report (draft report). TURN offers feedback on each below.

As an initial matter, TURN observes that PG&E's draft report largely focuses on operational execution issues such as scheduling delays, tenant coordination challenges, and the difficulty of reaching settlement - while insufficiently addressing the required policy, cost, and ratepayer impact dimensions of lessons learned. TURN's feedback below helps to address the topics missing from PG&E's draft report.

### **Lesson #1 ("longer than expected project timeline")**

PG&E explains that the "lesson learned" is that "PG&E and decarbonization project participants must plan for longer than expected project planning, negotiation with customers even if only a single landlord/property owner customer, inspection and construction of building electrification projects, and avoid projects that do not align with the priority schedule for safety-related pipeline replacement projects."

TURN generally agrees with this lesson learned. To better illustrate the lesson learned, TURN recommends that the report include a high-level comparison between the original assumed design-build-construction timeline presented in PG&E's August 10, 2022 application and the actual or expected post-litigation and tenant-resolution timeline (prior to the cessation of efforts by PG&E).

TURN also notes, however, that any potential problems with tenant acceptance were not apparent to parties in the proceeding outside of PG&E and CSU Monterey Bay. In its testimony submitted in this proceeding, PG&E stated that "although resident outreach and buy-in are essential, the decision to cease gas service can be made solely by CSU Monterey Bay. Without

the need to obtain individual service termination contracts from 600 customers, the retrofit work can proceed with the certainty and expedience required to avoid pipeline replacement.” (A.22-08-003, PG&E Amended Testimony, Dec. 19, 2022, p. 1-6, lines 9-13.) PG&E reiterated in Status Reports filed in October 2023 and June 2024 that negotiations for a final agreement were continuing, without any hint of problems with tenant acceptance.

For future projects, especially SB 1221 projects, TURN thus suggests that a corollary lesson learned is that other local entities should be involved in conversations with property owners and tenants, so as to promote acceptance by all affected parties. Furthermore, TURN generally agrees that electrification projects should avoid priority pipeline replacement projects. For this reason, in Rulemaking 24-09-012, TURN recommended focusing potential non-pipeline alternative projects in areas where gas replacement/repair projects are forecast to be necessary at least three to five years out, or even longer.

### **Lesson #2 (cost recovery, cost sharing, and cost effectiveness)**

PG&E states that the inability to reach settlement reflected the difficulty of resolving contested issues on an expedited schedule. However, the draft report does not substantively describe what those contested issues were, why parties disagreed, or how those disagreements informed PG&E’s final litigation position prior to seeking leave to withdraw the application.

TURN recommends that PG&E revise this section to explicitly document party positions and rationales regarding, at minimum: whether gas or electric ratepayers should bear electrification costs, how costs should be recovered (straight-line vs. accelerated recovery); the appropriate CPUC-approved ratepayer impact and cost-effectiveness tests; methodological assumptions including discount rates (ranging from 0–10 percent), EUL time horizons (10–20 years), gas mains/services pipeline useful life, assumptions on panel upgrade needs/costs, and the appropriate comparison metrics between gas vs. electric alternatives (e.g. nominal benefit-cost ratios versus net present value of revenue requirements); the treatment and valuation of greenhouse gas benefits (including assumed \$/ton social cost of carbon ranges); and, most importantly, party positions regarding capitalization and regulatory treatment of behind-the-meter (BTM) assets. These issues were central to the proceeding and the issues (including a set of appropriate data sources provided by PG&E / intervenors in support of their respective positions) should be transparently memorialized.

Further, and consistent with Ordering Paragraph 3’s requirement to address cost and ratepayer impacts, PG&E should also include a concise table summarizing contested cost inputs and ranges drawn from intervenor testimony and its own original August 10, 2022 application vs. amended December 19, 2022 application, with brief explanations for changes. This should include, at a minimum, Tables 2-2 and 2-3 of the original application (pp. 2-3 and 2-4, in constant 2026 dollars) with a summary of intervenor concerns regarding specific line items—such as construction labor, corporate overheads, cross-bore remediation, heat pump installation costs, remediation costs, and water heater assumptions—along with PG&E’s final rebuttal positions. Having this information readily available in the Lessons Learned report will enhance the report’s

value for proponents and stakeholders of future decarbonization projects.

PG&E also concludes that “PG&E and interested parties should solicit, file for or support decarbonization projects requiring Commission approval based on a realistic schedule for Commission approval – including litigation and determination of contested issues associated with the proposed Project – as well as the priority for safety related pipeline repairs and replacement – that provides that all such Project scheduling issues are resolved prior to the safety-related priority schedule for replacement or repair of the pipeline facilities proposed to be avoided by the project.”

As discussed extensively in TURN’s comments submitted in R.24-09-012, TURN suggests that the lesson learned is that cost recovery issues should not be litigated separately for each and every potential proposed decarbonization project. Instead, the Commission should establish a uniform policy concerning cost recovery that provides proper incentives without unfairly burdening ratepayers. This issue has been squarely presented for Commission resolution in comments submitted in R.24-09-012 on December 3, 2025 and December 17, 2025.

### **Lesson #3 (“safety-related expedited schedule”)**

PG&E concludes that future schedule-dependent decarbonization projects, such as safety-related projects, should assume that parties will contest elements of the project, and that disputes will impact the schedule for Commission decision-making.

TURN agrees that disputes are likely to impact the schedule for Commission resolution of proposed decarbonization projects. But as noted by TURN in response to Lesson #2, some of those disputes, particularly cost recovery policy issues, should be resolved by the Commission through a uniform policy to avoid the need to litigate similar cost recovery issues for each potential decarbonization project.

Moreover, the Lessons Learned report should recognize that a key contributor to delay in A.22-08-003 was the late disclosure of foundational safety issues that necessitated abrupt withdrawal of this application. TURN recommends that the report explicitly state that, for safety-driven gas pipeline replacement projects, IOUs should provide core pipeline risk information (including, but not limited to, latest likelihood / consequence of failure data from DIMP, latest RAMP related relative risk ranking) and a time-based estimate of urgency for pipe replacement at the outset of decarbonization proceedings, rather than after multiple rounds of discovery and testimony. Including this information at the time of project proposal may save others from re-learning this lesson in the future.

TURN appreciates PG&E’s collaboration in completing the Lessons Learned report as anticipated by the Commission in D.25-11-004.

Submitted by: Jalal Awan, Marcel Hawiger, and Hayley Goodson for TURN

**Attachment 5**

**Retainer Agreement with Consultant Marcel Hawiger for 2026 Work**



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Oakland, CA 94610  
415-929-8876 • [www.turn.org](http://www.turn.org)  
Mark Toney, Ph.D., Executive Director

December 12, 2025

Marcel Hawiger

[REDACTED]

Re: Agreement for Legal Consulting Services

Dear Mr. Hawiger:

This letter is to confirm the terms of the agreement for legal and consulting services between The Utility Reform Network ("TURN") and Marcel Hawiger ("Hawiger"), for work that Hawiger performs at TURN's request related to two existing CPUC proceedings, or other related matters as may be agreed upon.

SCOPE OF WORK

Starting on December 15, 2025, Hawiger will complete certain work on behalf of TURN, unless TURN determines that this work is unnecessary. This work is summarized as follows:

A.25-05-009 (PG&E GRC):

[REDACTED]

[REDACTED]

[REDACTED]

A.22-04-004 (PG&E Hinkley Compressor Station)

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

Other Proceedings

- Hawiger may provide limited billable or non-billable work on other cases based on his prior case participation and/or expertise with issues.

COMPENSATION AND BILLING

Hawiger agrees to provide these services at an hourly rate of \$250 in 2026, with the rate to be updated periodically through an addendum to this agreement. In addition, Hawiger will bill at cost for reasonable costs of travel outside of the Bay Area.

Billing for Compensable Work

Upon receipt of a monthly invoice from Hawiger, TURN will **pay 50% of the amount invoiced** (i.e. at an hourly billing rate of \$125) for services performed in that month within 30 days.

TURN will request compensation for Hawiger's work at the billed rate, and will pay Hawiger any remaining amount after an award of compensation. Hawiger will bear the entire risk that any award of compensation is less than the full requested amount; though in no case would Hawiger be liable to repay any of the 50% amount already paid by TURN.

Billing for non-Compensable Work

[REDACTED]

**TIME SHEETS AND INVOICES**

Hawiger will submit an invoice and detailed daily timesheets for work on behalf of TURN, and a detailed accounting of any expenses, in a format suitable for TURN's compensation requests. Timesheets shall include sufficient detail to identify the nature of the work and the nature of the issues addressed. Any monthly billing will include a cover email invoice that includes the hourly rate, total hours by case, and total billed by case for the month.

We are pleased to have you consulting for TURN on an ongoing basis. The signatures on this letter signify agreement to the terms set forth in this letter.

Very truly yours,



Hayley Goodson  
Managing Attorney

Agreement to the terms described above:



Marcel Hawiger  
Consultant to TURN