



FORM A: BLANK NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION

FILED

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

09:28 AM

Order Instituting Rulemaking Regarding Revisions to the
California Teleconnect Fund Program.

Rulemaking 25-08-005
(Filed August 14, 2025)

**NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION
AND, IF REQUESTED (and ☐ ¹ checked), ADMINISTRATIVE LAW JUDGE'S
RULING ON THE UTILITY REFORM NETWORK'S SHOWING OF
SIGNIFICANT FINANCIAL HARDSHIP**

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

Icompcoordinator@cpuc.ca.gov.

**Customer or Eligible Local Government Entity (party intending to claim intervenor
compensation): The Utility Reform Network (TURN)**

Assigned Commissioner: John Reynolds

**Administrative Law Judge: Joanna Perez-
Green**

I hereby certify that the information I have set forth in Parts I, II, III and IV of this Notice of Intent
is true to my best knowledge, information and belief.

Signature:

/s/

Date: January 23, 2026

Printed Name:

Ryan Johnston

PART I: PROCEDURAL ISSUES

(To be completed by the party intending to claim intervenor compensation)

| A. Status as "customer" (see Pub. Util. Code § 1802(b))² The party claims "customer" status because the party is (check one): | Applies (check) |
|--|----------------------------|
| 1. A Category 1 customer is an actual customer whose self-interest in the proceeding arises primarily from his/her role as a customer of the utility and, at | <input type="checkbox"/> |

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

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

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| the same time, the customer must represent the broader interests of at least some other customers. See, for example, D.08-07-019 at 5-10). | |
| <p>2. A Category 2 customer is a representative who has been authorized by actual customers to represent them. Category 2 involves a more formal arrangement where a customer or a group of customers selects a more skilled person to represent the customer’s views in a proceeding. A customer or group of customers may also form or authorize a group to represent them, and the group, in turn, may authorize a representative such as an attorney to represent the group.</p> | <input type="checkbox"/> |
| <p>3. A Category 3 customer is a formally organized group authorized, by its articles of incorporation or bylaws to represent the interests of residential customers or small commercial customers receiving bundled electric service from an electrical corporation (§1802(b)(1)(C)). Certain environmental groups that represent residential customers with concerns for the environment may also qualify as Category 3 customers, even if the above requirement is not specifically met in the articles or bylaws. See D.98-04-059, footnote at 30.</p> | <input checked="" type="checkbox"/> |
| <p>4. The party’s detailed explanation of the selected customer category.</p> <p><u>The party’s explanation of its status as a Category 1 customer.</u> A party seeking status as a Category 1 customer must describe the party’s own interest in the proceeding and show how the customer’s participation goes beyond just his/her own self-interest and will benefit other customers. Supporting documents must include a copy of the utility’s bill.</p> <p><u>The party’s explanation of its status as a Category 2 customer.</u> A party seeking status as a Category 2 customer must identify the residential customer(s) being represented and provide authorization from at least one customer.</p> <p><u>The party’s explanation of its status as a Category 3 customer.</u> If the party represents residential and small commercial customers receiving bundled electric service from an electrical corporation, it must include in the Notice of Intent either the percentage of group members that are residential ratepayers or the percentage of the members who are receiving bundled electric service from an electrical corporation. Supporting documentation for this customer category must include current copies of the articles of incorporation or bylaws. If current copies of the articles and bylaws have already been filed with the Commission, only a specific reference (the proceeding’s docket number and the date of filing) to such filings needs to be made.</p> <p>TURN is a Category 3 “group or organization authorized pursuant to its articles of incorporation or bylaws to represent the interests of residential ratepayers.” TURN originally provided the relevant portion of our articles of incorporation in the NOI submitted in A.98-02-017, and again in A.99-12-024. On October 15, 2015, TURN’s Board of Directors adopted amendments to TURN’s bylaws and</p> | |

| | |
|--|--|
| <p>articles of incorporation. TURN provided these revised bylaws and articles of incorporation in an amendment to the NOI submitted in A.15-09-001.</p> <p>TURN has approximately 15,000 dues-paying members, of whom we believe the vast majority are residential ratepayers. TURN does not poll our members in a manner that would allow a precise breakdown between residential and small business members, so a precise percentage is not available.</p> | |
| <p>Do you have any direct economic interest in outcomes of the proceeding?³</p> <p>If “Yes”, explain:</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| B. Conflict of Interest (§ 1802.3) | Check |
| 1. Is the customer a representative of a group representing the interests of small commercial customers who receive bundled electric service from an electrical corporation? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 2. If the answer to the above question is “Yes”, does the customer have a conflict arising from prior representation before the Commission? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| C. Status as an Eligible Local Government Entity (§§1802(d), 1802.4, 1803.1) | |
| <p>The party claims “eligible local government entity” status because the party is a city, county, or city and county that is not a publicly owned public utility that intervenes or participates in a Commission proceeding for the purpose of protecting the health and safety of the residents within the entity’s jurisdiction following a catastrophic material loss suffered by its residents either in significant damage to infrastructure or loss of life and property, or both, as a direct result of public utility infrastructure.</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <p><u>The party’s explanation of its status as an eligible local government entity</u> must include a description of</p> <p>(1) The relevant triggering catastrophic event;</p> <p>(2) The impacts of the triggering catastrophic event on the residents within the entity’s jurisdiction as a result of public utility infrastructure; and</p> <p>(3) The entity’s reason(s) to participate in this proceeding.</p> | |
| D. Timely Filing of Notice of Intent to Claim Intervenor Compensation (NOI) (§ 1804(a)(1)): | |
| 1. Is the party’s NOI filed within 30 days after a Prehearing Conference? Date of Prehearing Conference: 12/11/2025 | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 2. Is the party’s NOI filed at another time (for example, because no Prehearing Conference was held, the proceeding will take less than 30 days, the schedule did not reasonably allow parties to identify issues within the timeframe normally permitted, or new issues have emerged)? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

³ See Rule 17.1(f).

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

The Order Instituting Rulemaking states that Notices of Intent to claim intervenor compensation are due within 30 days of the release of the scoping memo. As of the time of this filing, the Commission has not released a scoping memo for this proceeding.

2b. The party's information on the proceeding number, date, and decision number for any Commission decision, Commissioner ruling, Administrative Law Judge's ruling, or other document authorizing the filing of NOI at that other time:

Order Instituting Rulemaking, issued Aug. 22, 2025, at pp. 26-27.

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

A. Planned Participation (§ 1804(a)(2)(A)):

The party's statement of the issues on which it plans to participate:

As discussed above, a scoping memo has not yet been issued for this proceeding. Based on the preliminary scope in the OIR, the issues raised at the pre-hearing conference by Judge Perez-Green, and TURN's advocated scope, TURN anticipates addressing the following issues:

1. Should the modifications discussed in Section 2.1 be made to specific participant categories, including CBOs, school districts and county education offices, HCBOs, government hospitals and healthcare districts, tribes, school annexes, library annexes, bookmobiles, program stakeholders, and eligible backbone services?
2. Should an audit and record retention policy for the program be implemented, as proposed in Section 2.1?
3. Should the reimbursement claims process be modified, as proposed in Section 2.3?
4. Should updates to the CTF Administrative Committee Charter be considered, as proposed in Section 2.4?
5. Will the CTF participant categories outlined in this OIR be impacted by changes in related federal programs or funding. If so, should changes to the program be considered to mitigate impacts to CTF participants?
6. Whether the CTF program discount percentage should be increased to support CTF eligible services that were recently removed from either the E-Rate program or Rural Health Care Program.
7. Whether a California Department of Education and Libraries-approved consortia should be allowed to apply to the CTF program on behalf of eligible schools and libraries that are outside that consortia's jurisdiction. If so, how?
8. Should the Commission reassess changes that resulted in a decrease in CBO participation?

The party's explanation of how it plans to avoid duplication of effort with other parties:

TURN will coordinate with the other active parties to limit duplication and ensure that each party offers a unique contribution. TURN expects to work closely with other intervenors in this proceeding with similar interests to coordinate efforts and ensure that the work is completed

efficiently without undue duplication. Where overlap may occur, TURN will work with these parties to ensure that TURN provides a distinct analysis by presenting material that complements or supplements the showing of other parties. TURN has already coordinated with the Center for Accessible Technology (CforAT) to file joint opening and reply comments on the OIR.

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

TURN has already actively participated in this proceeding by reviewing the OIR, submitting comments on the OIR, discussing the issues with other intervenors, preparing for the prehearing conference, and attending the prehearing conference. TURN expects to continue to participate in all aspects, tracks, and phases of this docket, including advocating for robust public and stakeholder participation, drafting comments, general fact-finding, and any other steps that the Commission deems necessary for this proceeding. TURN's estimated hours and total anticipated compensation estimates provided below are based on our general understanding of the Commission's plans for this docket as discussed in the OIR and Judge Perez-Green's proposed schedule. The nature and extent of TURN's participation may vary depending on the scope and schedule ultimately adopted by the Commission for this proceeding.

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

| Item | Hours | Rate \$ | Total \$ | # |
|--|-------|---------|-------------|---------------|
| ATTORNEY, EXPERT, AND ADVOCATE FEES | | | | |
| Ryan Johnston, TURN Attorney | 1 | \$450 | \$450 | |
| Kori Cordero, TURN Managing Attorney | 10 | \$500 | \$5,000 | |
| Ashley Salas, TURN Attorney | 9 | \$515 | \$4,635 | |
| Alexandra Green, TURN Attorney | 75 | \$275 | \$20,625 | |
| Subtotal: \$30,710 | | | | |
| OTHER FEES | | | | |
| [Person 1] | | | | |
| [Person 2] | | | | |
| Subtotal: \$ | | | | |
| COSTS | | | | |
| [Item 1] | | | | |
| [Item 2] | | | | |
| Subtotal: \$30,710 | | | | |
| TOTAL ESTIMATE: \$30,710 | | | | |
| Estimated Budget by Issues: | | | | |
| These estimates are preliminary, and they may change should the Commission broaden the scope of this proceeding or add other events or filings to the proceeding schedule. TURN plans to address the reasonableness of claimed compensation in our compensation request. | | | | |
| Budget Allocation by Issue Time Budget | | | Time | Budget |

| | | |
|--|-------------|-----------------|
| Should the modifications discussed in Section 2.1 be made to specific participant categories, including CBOs, school districts and county education offices, HCBOs, government hospitals and healthcare districts, tribes, school annexes, library annexes, bookmobiles, program stakeholders, and eligible backbone services? | 20% | \$6,142 |
| Should an audit and record retention policy for the program be implemented, as proposed in Section 2.1? | 18% | \$5,527.80 |
| Should the reimbursement claims process be modified, as proposed in Section 2.3? | 10% | \$3,071 |
| Should updates to the CTF Administrative Committee Charter be considered, as proposed in Section 2.4? | 10% | \$3,071 |
| Will the CTF participant categories outlined in this OIR be impacted by changes in related federal programs or funding. If so, should changes to the program be considered to mitigate impacts to CTF participants? | 20% | \$6,142 |
| Whether the CTF program discount percentage should be increased to support CTF eligible services that were recently removed from either the E Rate program or Rural Health Care Program. | 12% | \$3,685.20 |
| Whether a California Department of Education and Libraries-approved consortia should be allowed to apply to the CTF program on behalf of eligible schools and libraries that are outside that consortia's jurisdiction. If so, how? | 5% | \$1,535.50 |
| Should the Commission reassess changes that resulted in a decrease in CBO participation? | 5% | \$1,535.50 |
| Total | 100% | \$30,710 |
| <i>When entering items, type over bracketed text; add additional rows to table as necessary. Estimate may (but does not need to) include estimated Claim preparation time. Claim preparation time is typically compensated at ½ professional hourly rate.</i> | | |

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

| A. The party claims that participation or intervention in this proceeding without an award of fees or costs imposes a significant financial hardship, on the following basis: | Applies (check) |
|--|--------------------------|
| 1. The customer cannot afford, without undue hardship, to pay the costs of effective participation, including advocate's fees, expert witness fees, and other reasonable costs of participation. (§ 1802(h)) | <input type="checkbox"/> |

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| 2. In the case of a group or organization, the economic interest of the Individual members of the group or organization is small in comparison to the costs of effective participation in the proceeding. (§ 1802(h)) | <input type="checkbox"/> |
| 3. The eligible local government entities' participation or intervention without an award of fees or costs imposes a significant financial hardship. (§ 1803.1(b).) | <input type="checkbox"/> |
| 4. A § 1802(h) or § 1803.1(b) finding of significant financial hardship in another proceeding, made within one year prior to the commencement of this proceeding, created a rebuttable presumption in this proceeding (§ 1804(b)(1)). | <input checked="" type="checkbox"/> |
| Commission's finding of significant financial hardship made in proceeding number: A.25-03-015 | |
| Date of Administrative Law Judge's Ruling (or CPUC Decision) in which the finding of significant financial hardship was made: 7/8/2025 | |
| B. The party's explanation of the factual basis for its claim of "significant financial hardship" (§ 1802(h) or § 1803.1(b)) (necessary documentation, if warranted, is attached to the NOI: | |
| | |

**PART IV: ATTACHMENTS DOCUMENTING SPECIFIC
ASSERTIONS MADE IN THIS NOTICE**

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

| Attachment No. | Description |
|----------------|------------------------|
| 1 | Certificate of Service |
| | |

**ADMINISTRATIVE LAW JUDGE RULING⁴
(Administrative Law Judge completes)**

| | Check all that apply |
|--|--------------------------|
| 1. The Notice of Intent (NOI) is rejected for the following reasons: | <input type="checkbox"/> |
| a. The NOI has not demonstrated the party's status as a "customer" or an "eligible local government entity" for the following reason(s): | <input type="checkbox"/> |

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

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| b. The NOI has not demonstrated that the NOI was timely filed (Part I(B)) for the following reason(s): | <input type="checkbox"/> |
| c. The NOI has not adequately described the scope of anticipated participation (Part II, above) for the following reason(s): | <input type="checkbox"/> |
| 2. The NOI has demonstrated significant financial hardship for the reasons set forth in Part III of the NOI (above). | <input type="checkbox"/> |
| 3. The NOI has not demonstrated significant financial hardship for the following reason(s): | <input type="checkbox"/> |
| 4. The Administrative Law Judge provides the following additional guidance (see § 1804(b)(2)): | <input type="checkbox"/> |

IT IS RULED that:

| | |
|---|--------------------------|
| 1. The Notice of Intent is rejected. | <input type="checkbox"/> |
| 2. The customer or eligible local government entity has satisfied the eligibility requirements of Pub. Util. Code § 1804(a). | <input type="checkbox"/> |
| 3. The customer or eligible local government entity has shown significant financial hardship. | <input type="checkbox"/> |
| 4. The customer or eligible local government entity is preliminarily determined to be eligible for intervenor compensation in this proceeding. However, a finding of significant financial hardship in no way ensures compensation. | <input type="checkbox"/> |
| 5. Additional guidance is provided to the customer or eligible local government entity as set forth above. | <input type="checkbox"/> |

Dated _____, at San Francisco, California.

Administrative Law Judge