



Decision \_\_\_\_\_

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

D.24-12-006

02:30 PM

California Universal Telephone Service  
(California LifeLine) Program.

R2002008  
Rulemaking 20-02-008  
(Filed February 27, 2020)

**INTERVENOR COMPENSATION CLAIM OF CENTER FOR ACCESSIBLE  
TECHNOLOGY AND DECISION ON INTERVENOR COMPENSATION CLAIM OF  
CENTER FOR ACCESSIBLE TECHNOLOGY**

**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> <b>CENTER FOR ACCESSIBLE TECHNOLOGY</b>	<b>For contribution to Decisions D.24-12-006, D.25-08-050, D.25-10-025; D.25-10-033; D.25-11-008; and Resolution T-17789.</b>
<b>Claimed:</b> \$62,155.50	<b>Awarded:</b> \$
<b>Assigned Commissioner:</b> Alice Reynolds	<b>Assigned ALJ:</b> Robyn Purchia
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/ <b>Paul Goodman</b>
<b>Date:</b> January 23, 2026	<b>Printed Name:</b> <b>Paul Goodman</b>

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

<b>A. Brief description of Decision:</b>	D.24-12-006 Froze the Specific Support Amount (SSA) for the LifeLine Program.  D.25-08-050 Approved the Home Broadband Pilot.  D.25-10-033 implemented an Enrollment Path for LifeLine-eligible customers without Social Security Numbers.
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	<p>D.25-11-008 adopted General Order 153-A, resolved all issues in the scoping memo, and closed the proceeding.</p> <p>Res. T-17789 adopted Federal recertification requirements to align California's LifeLine renewal process with the FCC's Lifeline program.</p>
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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:	3/10/2020	
2. Other specified date for NOI:	See Comment 1	
3. Date NOI filed:	See Comment 1	
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:	See Comment 2 below	
6. Date of ALJ ruling:	See Comment 2 below	
7. Based on another CPUC determination (specify):	D.20-06-046, see comment 2 below.	
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:	See Comment 2 below	
10. Date of ALJ ruling:	See Comment 2 below	
11. Based on another CPUC determination (specify):	D.20-06-046, see comment 2 below.	
12. Has the Intervenor demonstrated significant financial hardship?		

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

	Intervenor	CPUC Verification
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.25-11-008	
14. Date of issuance of Final Order or Decision:	11/25/2025	
15. File date of compensation request:	January 23, 2026	
16. Was the request for compensation timely?		

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

#	Intervenor's Comment(s)	CPUC Discussion
1	<p>In D.25-07-033 (addressing a different CforAT Compensation Request in this proceeding), the assigned ALJ found that CforAT's NOI was timely filed.</p> <p>D.25-07-033 contains a lengthy explanation of the timeliness of CforAT's NOI. For the interest of efficiency, we do not repeat that discussion here but incorporate it by reference.</p>	
2	<p>Rule 17.2 of the Commission's Rules of Practice and Procedure states that "A party found eligible in one phase of a proceeding remains eligible in other phases, including any rehearing, in the same proceeding."</p> <p>CforAT was first awarded compensation in this proceeding in D.22-02-021, which also confirmed CforAT's eligibility. CforAT has received additional awards of compensation for substantial contributions in this proceeding in D.23-06-048, D.24-03-025, and D.25-07-033.</p>	

**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.)**

<b>Intervenor's Claimed Contribution(s)</b>	<b>Specific References to Intervenor's Claimed Contribution(s)</b>	<b>CPUC Discussion</b>
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<p><b>1. Background/Overview:</b> Throughout this proceeding (and its predecessor proceeding) CforAT has been an active participant in order to address ongoing issues of concern to our constituency of customers with disabilities, who are disproportionately low-income and who rely on the effective administration of the California LifeLine program. CforAT has regularly participated as part of a broad coalition of advocates as appropriate in order to efficiently advance the interests of our constituency.</p> <p>In conjunction with the various Decisions addressed in this compensation request, CforAT has provided input on multiple issues including revisions to the Specific Service Amount (SSA) and Minimum Service Standards (MSS) (including freezing the SSA), multiple petitions for modification, enrollment for individuals without social security numbers, and strategies to address the Home Broadband Gap. CforAT filed the following documents addressing those issues:</p> <ul style="list-style-type: none"><li>• Comments on Staff Proposal on LifeLine Specific Support Amount and Minimum Service Standards (Jan. 24, 2023) (Comments on SSA Staff Proposal)</li></ul>		
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<ul style="list-style-type: none"><li>• Reply Comments on Staff Proposal on LifeLine Specific Support Amount and Minimum Service Standards (Feb. 16, 2024) (Reply Comments on SSA Staff Proposal)</li><li>• Reply Comments on ALJ Ruling Requesting Comments on Staff Proposal on Enrollment for Individuals without Social Security Numbers (May 24, 2024) (SSN Reply Comments)</li><li>• Comments on ALJ Ruling Requesting Comments on Freezing the Specific Support Amount (June 3, 2024) (Comments on SSA Rate Freeze).</li><li>• Comments on Proposed Decision Implementing California LifeLine Enrollment Path for Californians Without Social Security Numbers (Aug. 12, 0224) (SSN PD Comments)</li><li>• Comments on Proposed Decision Freezing Specific Support Amount (Nov. 21, 2024) (Comments on SSA Freeze PD)</li><li>• Comments on Assigned Commissioner's Ruling Requesting Comments on Strategies to Address the Home Broadband Gap (May 16, 2025)</li></ul>		
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<p>(Comments on Home Broadband Gap).</p> <ul style="list-style-type: none"><li>• Reply Comments on Assigned Commissioner's Ruling Requesting Comments on Strategies to Address the Home Broadband Gap (May 28, 2025) (Reply Comments on Home Broadband Gap).</li><li>• Comments on Draft Resolution T-17889 (July 28, 2025).</li><li>• Reply Comments on Proposed Decision Approving Home Broadband Pilot (August 19, 2025) (Home Broadband PD)</li><li>• Joint Response of CforAT and TURN to AT&amp;T California's Application for Rehearing of Decision 25-08-050 (Oct. 21, 2025) (AT&amp;T PFM)</li><li>• Comments on PD Adopting General Order 153-A and Resolving Proceeding Issues (Nov. 4, 2025) (Comments on GO 153-A PD)</li><li>• Joint Comments of CforAT and TURN on PD Adopting General Order 153-A and Resolving Proceeding Issues (Nov. 13, 2025) (Reply Comments on GO 153-A PD)</li></ul>		
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<p><b>2. SSA/MSS</b></p> <p>Over the course of this proceeding, the Commission has considered and modified the Specific Support Amount (SSA, commonly referred to as the LifeLine subsidy) and the minimum standards for LifeLine service (known as the Minimum Service Standards, or MSS). The SSA and MSS were the subject of discussion throughout the proceeding. CforAT last received Intervenor Compensation for work related to the SSA/MSS in D.23-06-048, which compensated CforAT for work performed through November 22, 2021.</p>		
D.24-05-003 “temporarily freezes the specific support amount (SSA) for wireless and wireline providers at \$19.00 per month from January 1, 2025 through December 31, 2026, or until the Commission establishes a new methodology for calculating the SSA, whichever occurs first.” D.24-05-003 at p. 1. CforAT generally supported this outcome based on various arguments and analysis as addressed below.	CforAT’s input throughout the portions of the proceeding covered in this compensation request assisted the Commission in its decision to freeze the SSA D.24-12-006 Froze the Specific Support Amount (SSA) for the LifeLine Program. and contributed to the Commission’s determination that additional work was needed for a more comprehensive review of the SSA process. CforAT is continuing to work on this issue in R.25-11-005 (the successor proceeding to R.20-02-008), but it is appropriate for the Commission to award compensation at this time for our contributions supporting the Commission’s deliberative process in considering how to best evaluate the SSA.	

	<p>As a result of a scrivener's error, CforAT's February 10, 2025 Intervenor Compensation Claim requested compensation for work it had performed after the issuance of D.24-05-003 and D.24-12-006. In D.25-07-033 (which granted compensation to CforAT for contributions to those two decisions), the Commission stated that "Comments on the SSA/MSS Staff Proposal include both SSA/MSS and Foster Youth issues. Because the SSA/MSS issues have not been decided, those efforts are partially not compensable and are denied without prejudice." D.25-07-006. It is appropriate for CforAT to include time spent on SSA/MSS issues after the issuance of D.23-06-048 in this compensation request.</p>	
<p><b>Wireless Providers:</b></p> <p>CforAT argued that there was no nexus between the wireless LifeLine subsidy and providers' actual costs of offering LifeLine. Comments on SSA Staff Proposal at p.1; Comments on SSA Rate Freeze at pp. 1-2; Comments on SSA Freeze PD.</p>	<p>"As noted by the Staff Proposal and CforAT's comments, California LifeLine's SSA is an outlier among other states and untethered from providers' services." D.24-12-006 at p. 10.</p>	

<p>CforAT supported a freeze as reasonable and as a responsible stewardship of ratepayer funds. Comments on SSA Freeze at p. 2, <i>see also</i> Comments on SSA Staff Proposal at pp. 2, 5.</p>	<p>The Decision notes that the Commission is “concerned that allowing the current SSA methodology to continue unchecked and heavily dependent on one provider’s (AT&amp;T’s) rate increases places an unreasonable burden on Californians who pay a surcharge to fund the SSA. To protect this public interest, we agree with parties that the Commission should modify the SSA methodology established in D.10-11-033 so that the SSA is better aligned with the benefits Californians receive and more transparent.” D.24-12-006 at p. 10. Accordingly, the Commission froze the SSA while looking to revisit the existing methodology. <i>Id.</i></p>	
<p>CforAT recommended that the Commission regularly review and update the SSA. Comments on SSA/MSS Staff Proposal at pp. 6-7.</p>	<p>“While we authorize this temporary SSA freeze of \$19.00 per month for wireless and wireline providers, the Commission also commits to updating its SSA methodology.” D.24-12-006 at p. 12.</p>	
<p><b>Wireline Providers:</b></p> <p>CforAT argued that the Commission should move away from the existing COLR mechanism (which calculates the subsidy based on the highest basic service rate charged by an ILEC) because AT&amp;T’s (the provider that has consistently had the highest basic service rate) basic service rate is an outlier and AT&amp;T’s rate hikes over the years have been higher than those of other providers. Comments on SSA Staff Proposal at pp. 1, 6-7; Comments on SSA Rate Freeze at p. 1.</p>	<p>The Decision notes that the Commission is “concerned that allowing the current SSA methodology to continue unchecked and heavily dependent on one provider’s (AT&amp;T’s) rate increases places an unreasonable burden on Californians who pay a surcharge to fund the SSA. To protect this public interest, we agree with parties that the Commission should modify the SSA methodology established in D.10-11-033 so that the SSA is better aligned with the benefits Californians receive and more transparent.” D.24-12-006 at p. 10. Accordingly, the Commission froze the SSA. <i>Id.</i></p>	

<p>CforAT supported a freeze as reasonable and a responsible stewardship of ratepayer funds. Comments on SSA Staff Proposal at p. 2.</p>	<p>The Decision notes that the Commission is “concerned that allowing the current SSA methodology to continue unchecked and heavily dependent on one provider’s (AT&amp;T’s) rate increases places an unreasonable burden on Californians who pay a surcharge to fund the SSA. To protect this public interest, we agree with parties that the Commission should modify the SSA methodology established in D.10-11-033 so that the SSA is better aligned with the benefits Californians receive and more transparent.” D.24-12-006 at p. 10. Accordingly, the Commission froze the SSA while looking to revisit the existing methodology. <i>Id.</i></p>	
<p><b>Periodic Review of SSA:</b></p> <p>CforAT supported the SSA Staff Proposal but recommended that the Commission regularly review and update the SSA. Comments on SSA Staff Proposal at pp. 7-8; Comments on SSA Freeze at pp. 2-3.</p>	<p>“While we authorize this temporary SSA freeze of \$19.00 per month for wireless and wireline providers, the Commission also commits to updating its SSA methodology. For this reason, the temporary freeze of \$19.00 per month from January 1, 2025 through December 31, 2026, or until the Commission updates its SSA methodology, whichever occurs first, is justified and reasonable.” D.24-12-006 at p. 12.</p>	
<p>CforAT supported the Staff Proposal’s recommendation that the Commission consider a new SSA mechanism. Comments on SSA Proposal at pp. 3-4; Reply Comments on SSA Proposal at pp. 1-7.</p>	<p>While the Commission did not adopt the Staff Proposal’s specific recommendations, it agreed that a new SSA mechanism was necessary. D.24-12-006 at p. 11. “To protect this public interest, we agree with parties that the Commission should modify the SSA methodology established in D.10-11-033 so that the SSA is better aligned with the benefits Californians receive and more transparent.” D.24-12-006 at p. 10.</p>	

<p>CforAT argued that the Commission should reject Provider's arguments that competition was sufficient to ensure that the SSA and MSS were reasonable. Reply Comments on SSA Proposal at pp. 7-8.</p>	<p>While the Commission did not expressly address this issue, it did, (as described above), order a temporary freeze of the SSA. D.24-12-006 at p. 11. This decision implicitly rejects providers' arguments, and it is reasonable to assume that CforAT's discussion of competition issues contributed to the decision.</p>	
<p><b>4. Home Broadband Pilot:</b>  D.25-08-050 created a three-year, technology neutral, Home Broadband Pilot to test the viability of a broadband subsidy for low-income customers.</p>	<p>See discussion below.</p>	
<p>CforAT argued that home broadband is a necessity to allow Californians to fully and meaningfully participate in society. Comments on Home Broadband Gap at pp. 6-8.</p>	<p>D.25-08-050 explicitly notes that CforAT "produced data supporting the Report's findings," (D.25-08-050 at pp. 9, 11) and, citing that data, found that "home broadband, including fixed and wireless, is a necessary service for California households." D.25-08-050 at p. 11.</p>	
<p>CforAT argued that home broadband was unaffordable for many low-income households. Comments on Home Broadband Gap at pp. 4-6; Reply Comments on Home Broadband Gap at pp. 2-4.</p>	<p>"We also find that affordability is a significant barrier to home broadband for many California LifeLine-eligible households. This broadband affordability gap impacts the ability of low-income Californians to participate in telework, telelearning, telehealth, public safety, civic engagement, social media, website browsing, and streaming activities at the same level as higher-income Californians." D.25-08-050 at pp. 11-12.</p>	

CforAT argued that a pilot program was unnecessary, and that the Commission should proceed by adopting a permanent home broadband subsidy. Comments on Home Broadband Gap at p. 6; Reply Comments on Home Broadband Gap at p. 8.	While Commission did not adopt CforAT's recommendation, D.25-08-050 does indicate that the Commission considered CforAT's arguments. "While we recognize CforAT's and the Independent Small LECs' position that further statutory changes may be unnecessary for the Commission to adopt a permanent broadband program, we see value in adopting a pilot." D.25-08-050 at p. 13. The above language indicates that the Commission did consider CforAT's arguments. Accordingly, it is fair to conclude that CforAT's arguments assisted the Commission in making an order or decision. <i>See</i> D.25-07-031 at p. 29; D.05-04-049 at p. 7 ("[e]ven where the Commission does not adopt any of the customer's recommendations, compensation may be awarded if, in the judgment of the Commission, the customer's participation substantially contributed to the decision or order.")	
CforAT argued that the Home Broadband Pilot should use the same eligibility criteria as the telephone LifeLine program. Comments on Home Broadband Gap at p. 11.	The Commission adopted the same criteria for eligibility as the criteria in the telephone LifeLine program. D.25-08-050 at p. 18.	

<p>CforAT argued that the existing California and Federal subsidies for LifeLine services were sufficient to pay for both mobile telephone and broadband services (Comments on Home Broadband Gap at p. 9), but insufficient to cover the cost of both fixed (i.e., home) telephone and broadband service. Comments on Home Broadband Gap at p. 9.</p> <p>CforAT further argued that the Commission should create a broadband subsidy for fixed broadband service, and that an additional subsidy for mobile service was unnecessary. Comments on Home Broadband Gap at p. 9.</p>	<p>The Commission authorized an additional subsidy for fixed broadband service. D.25-08-050 at p. 53, Ordering Paragraph 3.</p>	
<p>CforAT cautioned that the abrupt termination of the federal ACP program had eroded customer trust in LifeLine and recommended that the Commission include sufficient notice to customers before any wind-down of the Home Broadband Pilot. Comments on Home Broadband Gap at p. 20.</p>	<p>D.25-08-050 explicitly requires that Home Broadband Pilot program participants receive at least 30 days' notice of changes to, or termination of, service. D.25-08-050 at p. 17.</p>	

<p>CforAT recommended a number of minimum service standards, including download and upload speeds of at least 100/20 Mbps and no data caps. Comments on Home Broadband Gap at pp. 11-12. CforAT further recommended that the Commission create a limited exception to the minimum service speeds for networks that are currently unable to meet the minimum standards. Comments on Home Broadband Gap at pp. 12-13.</p>	<p>The Commission set minimum download/upload speeds of 110/20 Mbps, with a limited exception where a provider's network is unable to meet the minimum standards. D.25-08-050 at pp. 25-26.</p> <p>The Commission did not prohibit data caps but did set a relatively high data cap of 1280 GB a month, and further directed staff to review the MSS at least once during the pilot to determine if those requirements are still sufficient. D.25-08-050 at p. 25.</p>	
<p>CforAT argued that the Commission should not provide an additional subsidy for providers who could, but choose not to, participate in the federal Lifeline program. Comments on Home Broadband Gap at pp. 14-15.</p>	<p>"[W]e will not make up the federal subsidy difference for providers participating in the Pilot. Providers that are eligible for California LifeLine, but not federal Lifeline, will receive only the California LifeLine subsidy amount. Similarly, service providers without ETC designation will receive only the California LifeLine subsidy amount." D.25-08-050 at p. 31.</p>	
<p>CforAT argued that the Commission should reject provider arguments that the Commission's minimum service standards somehow made the Pilot not "technologically neutral." Comments on Home Broadband PD at pp. 3-4.</p>	<p>"We, therefore, find that the Pilot is technology-neutral and decline to adopt NaLA's recommendations." D.25-08-050 at p. 38.</p>	

<p><b>5. SSN:</b></p> <p>D.25-10-033 created a process for individuals without Social Security Numbers to enroll in the LifeLine program. CforAT supported the creation of this process, but limited its participation on this issue to discussing the importance of any process being accessible to people with disabilities.</p>	<p>See discussion below.</p>	
<p>CforAT argued that online materials must be accessible to people with disabilities and designed in accordance with web accessibility guidelines. Reply Comments on SSN Ruling at pp. 2, 4; Comments on SSN PD at pp. 2-3.</p>	<p>“We also recognize that the integration of web technologies into the California LifeLine program raises legitimate accessibility concerns. The Commission must address these concerns under the Moore Act’s mandate to make high-quality communications services available to the greatest number of Californians and Government Code Section 11546.7. Under Government Code Section 11546.7(a), the Commission must ensure that its public websites comply with the current Web Content Accessibility Guidelines. We also recognize that the identity verification software being considered affords applicants additional time to access and use technology resources than the current process.” D.25-10-003 at p. 25 (internal citations omitted).</p>	
<p>CforAT recommended that the program should include in-person application assistance. Reply Comments on SSN Ruling at pp. 2-3.</p>	<p>D.25-10-003 directs Commission Staff to create a proposal for a “trusted partner network” where applicants can get assistance in local spaces like community-based organizations, clinics, and schools. D.25-10-003 at p. 16.</p>	

<p>CforAT argued that requiring that applicants provide three months of bank statements or pay for notary service could be cost-prohibitive. Reply Comments on SSN Ruling at p. 3; Comments on SSN PD at p. 3.</p>	<p>The Commission was “sensitive to the concerns raised by Consumer Coalition, CforAT, and Low-Income Advocates and can see how eligible Californians would struggle to provide bank statements or a notarized affidavit/self-declaration.” D.25-10-003 at p. 22. Accordingly, the Commission eliminated those requirements (although it did clarify that applicants would still be required to demonstrate income-based eligibility as required by General Order 153). D.25-10-003 at p. 22.</p>	
<p><b>6. Resolution T-17889</b></p> <p>Resolution T-17889 aligns the California Lifeline annual renewal requirements with the FCC’s renewal requirements.</p> <p>CforAT raised concerns that many consumers do not routinely respond to the Commission’s standard communications channels, and recommended that the Commission give customers an additional 30 days beyond the federal deadline for renewal. Doing so would result in customers seeing that their bill had increased by \$9.25 a month (the amount of the federal subsidy), rather than increasing by both the state and federal subsidy. This would make it more likely that customers would respond by submitting the required renewal documents. CforAT Comments on Proposed Resolution T-17889 (July 28, 2025).</p>	<p>While Res. T-17889 declined to adopt CforAT’s recommendation, it did note that it reviewed and <i>considered</i> those recommendations. T-17889 at p. 9. Accordingly, it is fair to conclude that CforAT’s arguments assisted the Commission’s deliberations and thus contributed to its determinations while making an order or decision.</p>	

<b>7. GO153-A</b>  D.25-11-008 adopted revisions to General Order 153 (now General Order 153-A) to reflect changes made by the Commission in previous decisions. The decision further resolved all issues raised in the scoping memo and closed the proceeding.	See discussion below.	
CforAT recommended that the Commission anticipate future revisions to GO153-A, and specifically recommended that the Commission retain language requiring that providers comply with future decisions that supersede GO153. Comments on GO 153-A PD at pp. 2-3; Reply Comments on GO 153-A at pp. 3-4.	“We agree with TURN/CforAT that it is necessary to revise Section 11.1.1 to identify D.22-10-021 or any subsequent decision or order superseding D.22-10021 as the authority for the decision.” D.25-11-008 at p. 11.	
<b>8. Working Group:</b>  CforAT participated in the Renewals Working Group. Additionally, Kathryn (Kate) Woodford, CforAT’s Policy Analyst, is an ongoing participant in the LifeLine Working Group, broadly helping address issues as they arise. Topics discussed at these meetings included Social Security Number issues and the SSA/MSS. Ms. Woodford’s participation in these meetings (and CforAT’s review of information provided at these meetings) informed CforAT’s positions on the issues discussed above.	While not directly reflected in decisions, the Working Groups routinely support the effective management of the LifeLine program, and CforAT’s work in these Working Groups is appropriate and compensable. See D.24-03-025 at p. 14.	

**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> The Utility Reform Network, The Greenlining Institute  Additionally, a number of additional parties (Legal Aid Association of California, Maternal and Child Health Access, Neighborhood Legal Services of Los Angeles County, and Alameda County Homeless Action Center) shared CforAT's position on the need to create a process for individuals without Social Security numbers to participate in the LifeLine program specifically.		
<b>d. Intervenor's claim of non-duplication:</b>  As was the case in prior phases of this proceeding as well as its predecessor (R.11-03-013), CforAT has maintained our practice of working regularly with other consumer groups, including preparation of joint filings when appropriate. In preparing joint filings, we implement shared responsibilities, managed by conferring between the parties in order to work efficiently, and to avoid duplication. CforAT coordinated with TURN for most filings, whether or not we produced a joint document. When the organizations had different policy positions on specific issues, we still coordinated and addressed those issues where we agreed in collaborative fashion.  Additionally, CforAT deferred to other consumer advocates' expertise when appropriate. For example, CforAT's has requested minimal hours addressing issues related to use of customer Social Security Numbers because TURN focused substantially on those issues. In contrast, CforAT maintained our specific focus on impacts on people with disabilities and medical needs throughout the proceeding.		

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<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.

**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):**

	CPUC Discussion
<p><b>a. Intervenor's claim of cost reasonableness:</b></p> <p>The importance of the issues under consideration in this proceeding is extremely high for all low-income customers, and even greater for CforAT's constituency of customers with disabilities and medical needs who rely on affordable and accessible communications services to support their ability to live independently. For this reason, and to ensure that the needs of this unique constituency were addressed in all aspects of this proceeding, it is appropriate that CforAT expended substantial resources in our ongoing participation. As in prior phases, CforAT has continued to work diligently to ensure that the Commission appropriately takes into consideration the needs of vulnerable customers, whose health and safety are at risk when they lose access to communications services and who may have limited resources to take action on their own.</p> <p>While it remains difficult to assign a dollar value to the impact of the ongoing activity on de-energization issues, Customers with disabilities will benefit from CforAT's diligent oversight and ongoing input on their communications needs, and all customers will benefit from efforts to increase the availability of LifeLine services and manage the amount that ratepayers pay in subsidies.</p> <p>In light of the ongoing importance of issues surrounding affordability to customers with disabilities and low-income households, CforAT's request for compensation for our ongoing review and efforts to improve and protect the LifeLine program is reasonable.</p>	
<p><b>b. Reasonableness of hours claimed:</b></p> <p>In working with the other consumer advocates, the organizations generally split up assignments for separate research and drafting responsibilities and then conducted collaborative reviews and finalization of documents. In this way, the organizations work together effectively, while avoiding</p>	

CPUC Discussion
<p>duplication of effort. Through this coordination, the consumer groups were able to continue to effectively address the broad array of issues that have been raised in this docket more effectively and efficiently than if each organization had tried to work alone. As appropriate, CforAT also coordinated with other active parties to minimize disputes and find areas of agreement on various issues. Overall, CforAT worked effectively to avoid duplication and to ensure that our input served to complement or supplement the input of other parties that share similar interests to our own.</p> <p>CforAT's lead attorney in this proceeding, Paul Goodman, has worked on LifeLine issues for many years and was therefore efficient in his review of issues. While Mr. Goodman was preparing for and participating in evidentiary hearings in another proceeding, CforAT's Legal Director Melissa Kasnitz and CforAT's Legal Fellow/Staff Attorney Rachel Sweetnam appropriately stepped in to ensure that the interests of persons with disabilities were protected. Accordingly, the CforAT's requested time is reasonable.</p>
<p><b>c. Allocation of hours by issue:</b></p> <p><b>2023 Time—Goodman (5.4 hours total)</b></p> <p><b>Procedural: 0.5 hours, 9.26 percent</b></p> <p>The issue area “Procedural” includes time spent on procedural matters such as scheduling.</p> <p><b>Coordination: 0.9 hours, 16.67 percent</b></p> <p>The issue area “Coordination” includes time spent conferring and collaborating with other parties, coordinating filings, and otherwise avoiding duplication of effort.</p> <p><b>SSA/MSS: 1.8 hours, 33.33 percent</b></p> <p>The issue area “SSA/MSS” includes time spent on issues regarding the LifeLine specific support amount and minimum service standards, including the Commission’s SSA freeze.</p> <p><b>SSN: 2.2 hours, 40.74 percent</b></p> <p>The issue area “SSN” includes time spent on issues regarding eligibility for individuals without Social Security Numbers.</p>

CPUC Discussion
<p><b>2024 Time—Goodman (27.4 hours total)</b></p> <p><b>General Participation: 0.7 hours, 2.55 percent</b></p> <p>The issue area “General Participation” includes time spent on activities that do not fall neatly into the other issue categories.</p> <p><b>Procedural: 0.1 hours, 0.36 percent</b></p> <p><b>Coordination: 0.8 hours, 2.92 percent</b></p> <p><b>SSA/MSS: 19.2 hours, 71.53 percent</b></p> <p><b>SSN: 2.2 hours, 8.03 percent</b></p> <p><b>Home Broadband: 3.5 hours, 12.77 percent</b></p> <p>The issue area “Home Broadband” includes time spent on issues related to solutions to the home broadband gap, including the Home Broadband Pilot. This issue area also includes time spent in stakeholder meetings with consumer, industry, and government representatives to find areas of consensus and discuss possible solutions to the home broadband gap. See, e.g., Comments on Home Broadband Gap at pp. 11-12.</p> <p><b>Working Group: 0.5 hours, 1.82 percent</b></p> <p>The issue area “Working Group” includes time spent participating in the LifeLine Working Group and reviewing materials and reports provided to the Group.</p> <p><b>2025 Time—Goodman (34 hours total)</b></p> <p><b>General Participation: 1.7 hours, 5.00 percent</b></p> <p><b>Procedural: 0.3 hours, 0.88 percent</b></p> <p><b>SSA/MSS: 0.2 hours, 0.59 percent</b></p> <p><b>Home Broadband: 27.5 hours, 80.88 percent</b></p> <p><b>T-17889: 4.3 hours, 12.65 percent</b></p> <p>The issue area “T-17889” includes time spent reviewing and drafting comments on Resolutions T-17889.</p>

CPUC Discussion
<p><b>2021 Time—Kasnitz (0.2 hours total)</b></p> <p><b>SSN: 0.2 hours, 100 percent</b></p> <p><b>2023 Time--Kasnitz</b></p> <p><b>SSA/MSS: 1.9 hours, 100 percent</b></p> <p><b>2024 Time--Kasnitz</b></p> <p><b>SSA/MSS: 3.7 hours, 64.91 percent</b></p> <p><b>SSN: 2 hours, 35.09 percent</b></p> <p><b>2025 Time--Kasnitz</b></p> <p><b>Home Broadband: 3.1 hours, 41.33 percent</b></p> <p><b>GO 153-A: 4.4 hours, 58.67 percent</b></p> <p>The issue area “GO 153-A” includes time spent on the Commission’s revisions to General Order 153 (now General Order 153-A).</p> <p><b>2023 Time--Sweetnam</b></p> <p><b>SSA/MSS: 0.2 hours, 100 percent</b></p> <p><b>2024 Time--Sweetnam</b></p> <p><b>SSA/MSS: 4.7 hours, 58.75 percent</b></p> <p><b>SSN: 3.3 hours, 41.25 percent</b></p> <p><b>2025 Time--Sweetnam</b></p> <p><b>GO 153-A: 1.4 hours, 100 percent</b></p> <p><b>2023 Time—Woodford</b></p>

CPUC Discussion
<p><b>SSN: 0.4 hours, 21.05 percent</b></p> <p><b>Working Group: 0.5 hours, 78.95 percent</b></p> <p style="text-align: center;"><b>2024 Time—Woodford</b></p> <p><b>Working Group: 0.8 hours, 100 percent</b></p> <p style="text-align: center;"><b>2025 Time—Woodford</b></p> <p><b>Working Group: 1.6 hours, 100 percent.</b></p>

**B. Specific Claim:\***

CLAIMED					CPUC AWARD			
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Goodman	2023	5.4	\$575	D.24-03-025	\$3,150.00			
Goodman	2024	27.4	\$625	D.25-04-018	\$17,125.00			
Goodman	2025	34	\$680	Comment 3	\$23,120.00			
Kasnitz	2021	0.2	\$670	D.22-07-018	\$134.00			
Kasnitz	2023	1.9	\$715	D.24-06-018	\$1,358.50			
Kasnitz	2024	5.7	\$735	D.24-10-028	\$4,189.50			
Kasnitz	2025	7.5	\$755	D.25-10-060	\$5,662.50			
Sweetnam	2023	0.2	\$220	D.24-06-022	\$44.00			
Sweetnam	2024	8	\$240	D.25-04-041	\$1,920.00			
Sweetnam	2025	1.4	\$275	D.25-10-050	\$385.00			
Woodford	2023	1.9	\$280	D.24-06-020	\$532.00			
Woodford	2024	0.8	\$290	Comment 4	\$232.00			
Woodford	2025	1.6	\$380	Comment 5	\$608.00			
<i><b>Subtotal: \$58,415.50</b></i>						<i><b>Subtotal: \$</b></i>		

CLAIMED						CPUC AWARD		
<b>OTHER FEES</b>								
<b>Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):</b>								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
[Person 1]								
[Person 2]								
<b><i>Subtotal: \$</i></b>						<b><i>Subtotal: \$</i></b>		
<b>INTERVENOR COMPENSATION CLAIM PREPARATION **</b>								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Goodman	2026	12	\$340	Comment 6	\$3,740.00			
[Preparer 2]								
<b><i>Subtotal: \$3,740.00</i></b>						<b><i>Subtotal: \$</i></b>		
<b>COSTS</b>								
#	Item	Detail			Amount	Amount		
1.								
2.								
<b><i>Subtotal: \$</i></b>						<b><i>Subtotal: \$</i></b>		
<b><i>TOTAL REQUEST: \$62,155.50</i></b>						<b><i>TOTAL AWARD: \$</i></b>		
<p>*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.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate</p>								
<b>ATTORNEY INFORMATION</b>								
Attorney		Date Admitted to CA BAR <sup>3</sup>		Member Number		Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation		
Melissa W. Kasnitz		1992		162679		No		
Paul Goodman		2002		219086		No		
Rachel Sweetnam		2023		350075		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>.

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

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Time Records, including merits and time on compensation
3	<p><b>Rate for Paul Goodman in 2025:</b></p> <p>On September 23, 2025, CforAT filed an intervenor compensation claim in A.19-11-003 that included a request that the Commission adopt an hourly rate of \$680 for CforAT's Legal Counsel, Paul Goodman, based on the Market Rate Study and guidance adopted in Resolution ALJ-393, issued on December 22, 2020. The Commission has not yet acted on that intervenor compensation claim. Rather than repeat the same showing here for the requested hourly rate for Mr. Goodman, CforAT refers the Commission to the showing presented in A.20-11-001.</p>
4	<p><b>Rate for Kate Woodford in 2024:</b></p> <p>On February 6, 2025, CforAT filed an intervenor compensation claim in R.18-12-005 that included a request that the Commission adopt an hourly rate of \$290 for CforAT's Policy Analyst, Kate Woodford, based on the Market Rate Study and guidance adopted in Resolution ALJ-393, issued on December 22, 2020. The Commission has not yet acted on that intervenor compensation claim. Rather than repeat the same showing here for the requested hourly rate for Ms. Woodford, CforAT refers the Commission to the showing presented in R.18-12-005.</p>
5	<p><b>Rate for Kate Woodford in 2025:</b></p> <p>On August 8, 2025, CforAT filed an intervenor compensation claim in A.25-08-002 that included a request that the Commission adopt an hourly rate of \$380 for CforAT's Policy Analyst, Kate Woodford, based on the Market Rate Study and guidance adopted in Resolution ALJ-393, issued on December 22, 2020. The Commission has not yet acted on that intervenor compensation claim. Rather than repeat the same showing here for the requested hourly rate for Ms. Woodford, CforAT refers the Commission to the showing presented in A.25-08-002.</p>
6	<p><b>Rates for Time Spent on Compensation Request:</b> While this compensation request was drafted in 2026, all the recorded work on the merits took place in 2024 or earlier. For this reason, CforAT is requesting time spent on compensation at <math>\frac{1}{2}</math> the standard rates for 2025. We will request updated rates for 2026 rates in a later compensation request.</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</b> <b>(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. **CENTER FOR ACCESSIBLE TECHNOLOGY** [has/has not] made a substantial contribution to D.24-12-006, D.25-08-050, D.25-10-025; D.25-10-033; D.25-11-008; Resolution T-17789..
2. The requested hourly rates for **CENTER FOR ACCESSIBLE TECHNOLOGY**'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. **CENTER FOR ACCESSIBLE TECHNOLOGY** is awarded \$\_\_\_\_\_.
2. Within 30 days of the effective date of this decision, \_\_\_\_\_ shall pay **CENTER FOR ACCESSIBLE TECHNOLOGY** the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay **CENTER FOR ACCESSIBLE TECHNOLOGY** 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 **CENTER FOR ACCESSIBLE TECHNOLOGY**’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.24-12-006, D.25-08-050, D.25-10-025; D.25-10-033; D.25-11-008; Resolution T-17789.		
<b>Proceeding(s):</b>	R.20-02-008		
<b>Author:</b>			
<b>Payer(s):</b>			

**Intervenor Information**

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
CENTER FOR ACCESSIBLE TECHNOLOGY	January 23, 2026	62,155.50		N/A	

**Hourly Fee Information**

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Paul	Goodman	Attorney	\$575	2023	
Paul	Goodman	Attorney	\$625	2024	
Paul	Goodman	Attorney	\$680	2025	
Melissa	Kasnitz	Attorney	\$670	2021	
Melissa	Kasnitz	Attorney	\$715	2023	
Melissa	Kasnitz	Attorney	\$735	2024	
Melissa	Kasnitz	Attorney	\$755	2025	
Rachel	Sweetnam	Attorney	\$220	2023	
Rachel	Sweetnam	Attorney	\$240	2024	
Rachel	Sweetnam	Attorney	\$275	2025	
Kate	Woodford	Analyst	\$280	2023	
Kate	Woodford	Analyst	\$290	2024	

Revised March 2023

Kate	Woodford	Analyst	\$380	2025	
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**(END OF APPENDIX)**