



Decision _____

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

2026

01:12 PM

A2503015

Application of Pacific Gas and Electric Company to Recover in Customer Rates the Costs to Support Extended Operation of Diablo Canyon Power Plant from January 1 through December 31, 2026 and for Approval of Planned Expenditure of 2026 Volumetric Performance Fees (U 39 E)

Application 25-03-015
(Filed March 28, 2025)

**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.

Intervenor: The Utility Reform Network	For contribution to Decision (D.) 25-12-007
Claimed: \$196,265	Awarded: \$
Assigned Commissioner: Karen Douglas	Assigned ALJ: Jack Chang
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).	
Signature:	/s/
Date: 2/6/26	Printed Name: Matthew Freedman

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

A. Brief description of Decision:	Approves Pacific Gas and Electric Company's (PG&E's) 2026 Diablo Canyon Power Plant extended operations revenue requirement of \$382.233 million. The revenue requirement is allocated to PG&E, Southern California Edison Company, and San Diego Gas & Electric Company using the allocation factors 44.19 percent, 45.86 percent, and
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	9.95 percent, respectively. Also approves PG&E's Volumetric Performance Fees spending plan and addresses other matters relating to Diablo Canyon.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812¹:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	05/30/2025	
2. Other specified date for NOI:		
3. Date NOI filed:	06/06/2025	
4. Was the NOI timely filed?		
Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	A.25-03-015	
6. Date of ALJ ruling:	07/08/2025	
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	A.25-03-015	
10. Date of ALJ ruling:	07/08/2025	
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.25-12-007	
14. Date of issuance of Final Order or Decision:	12/09/2025	
15. File date of compensation request:	2/06/2026	
16. Was the request for compensation timely?		

¹ All statutory references are to California Public Utilities Code unless indicated otherwise.

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

#	Intervenor's Comment(s)	CPUC Discussion
PART II: SUBSTANTIAL CONTRIBUTION <i>(to be completed by Intervenor except where indicated)</i>		

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
1. TRANSITION COSTS TURN's testimony and briefs note that PG&E's application and testimony did not identify any Diablo Canyon transition costs recovered through funds provided under the \$1.4 billion Department of Water Resources (DWR) loan. TURN referenced PG&E's sworn statements in federal court including a "Transition and License Renewal Expenditure Summary" (TLRES) that indicated transition costs in excess of the DWR loan amount. As a result of PG&E's refusal to present these costs, or to respond to data requests on this topic, TURN pointed to the significant risk that some Diablo Canyon costs could have been double recovered or shifted from the DWR loan to ratepayers without any transparency. TURN urged the commission to require PG&E to identify the specific excess transition costs identified in the TLRES and clarify any	<u>Ex. TURN-1, Direct Testimony of William Monsen, pages 52-57</u> <u>TURN opening brief, pages 10-15</u> <u>TURN reply brief, pages 5-6</u> <u>TURN opening comments on Proposed Decision, pages 11-14</u>	

<p>intention to recover these costs in customer rates.</p> <p>The Decision finds that TURN and other intervenors “raise legitimate concerns that PG&E may be recovering, in this application, overspending on DCPP transition and renewal costs in excess of the \$1.4 billion DWR loan”. (page 25) The Decision further agrees that “the parties appropriately raise questions as to whether PG&E’s reprioritization of transition and renewal funds might be improperly shifting those costs to the current application as funding for DCPP extended operations.” Based on these concerns, the Decision requires PG&E, in future Diablo Canyon cost recovery proceedings, to “disclose whenever any transition and license renewal costs that were part of the amounts included in the TLRES are proposed for recovery in any future DCPP forecast proceedings for DCPP extended operations, along with explanations for why those costs were originally proposed as transition and license renewal costs and why those costs are now eligible for recovery for extended operations.” (pages 25-26)</p>	<p><u>D.25-12-007, pages 25-26, 77-78, Ordering Paragraph 5.</u></p>	
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<p>2. FIXED MANAGEMENT FEE</p> <p>TURN's testimony noted that PG&E failed to present any data that would permit the calculation of Fixed Management Fee (FMF) escalation using the generation capital escalation methodology approved in D.24-12-033. Because PG&E refused to respond to TURN's data requests on this topic, TURN calculated alternative escalation factors using relevant escalation values obtained from PG&E's General Rate Case application. When PG&E presented new generation capital escalators in response to a ruling from the ALJ, TURN identified significant discontinuities with historic data which raised serious questions about the reliability of the new dataset. TURN further expressed concerns with PG&E proposing a new escalation methodology only months after the adoption of D.24-12-033 and urged the Commission not to allow PG&E to continue to propose new methodologies and data sets in future proceedings. TURN also asked the Commission to prevent PG&E from recalculating multiple prior years of escalation in any future proceeding.</p> <p>TURN argued that PG&E's efforts to claim confidential treatment for publicly available</p>	<p><u>Ex. TURN-1, Testimony of William Monsen, pages 9-22</u></p> <p><u>TURN opening brief, pages 4-8.</u></p> <p><u>TURN reply brief, pages 1-5.</u></p> <p><u>TURN opening comments on PG&E Update Testimony, pages 1-2.</u></p> <p><u>Ex. TURN-5, Testimony of William Monsen</u></p> <p><u>TURN opening comments on Proposed Decision, pages 1-3</u></p> <p><u>TURN reply comments on Proposed Decision, pages 3-4.</u></p> <p><u>TURN opening brief, pages 7-8.</u></p>	
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<p>Consumer Price Index data was contrary to Commission policy and violated General Order 66-D. In response to TURN's concerns, PG&E made the CPI escalation data public in its Update Testimony.</p>	<p><u>PG&E Update Testimony, October 8, 2025, page 7.</u></p>	
<p>In response to TURN's prepared testimony noting the absence of any data that would allow the Commission to calculate Fixed Management Fee escalation consistent with the methodology approved in D.24-12-033, the ALJ issued two separate rulings. The first ruling directed PG&E to submit "a calculation of and workpapers for the 2026 fixed management fees using the escalation factor methodology authorized in Decision 24-12-033 by no later than September 8, 2025." (August 29 Ruling, page 2) In response to a TURN exhibit entered into the record during evidentiary hearings highlighting discontinuities in generation capital escalation data presented in A.24-03-018 and in PG&E's response to the August 29th Ruling, the ALJ issued a second ruling directing PG&E to include additional information explaining the "dramatic shift" between the escalation factors used in A.24-03-018 and those presented in PG&E's September 8th supplemental filing.</p>	<p><u>ALJ Ruling Directing Filing of Additional Information on September 8, 2025, August 28, 2025</u></p> <p><u>Evidentiary hearing transcript, September 9, 2025, pages 14-15</u></p> <p><u>Ex. TURN-4, PG&E workpapers from A.24-03-018</u></p> <p><u>ALJ Ruling Directing Filing of Additional Information on October 8, 2025, pages 2-3.</u></p>	
<p>Although the final Decision does not adopt TURN's recommended changes to PG&E's proposed calculation</p>	<p><u>D.25-12-007, pages 34-35.</u></p>	

<p>of the 2027 Fixed Management Fee using the cumulative CPI-U values, the Decision does require PG&E to limit any future escalation to incremental annual changes relative to “the Fixed Management Fee approved in the previous year’s DCPP application.” (page 35) This limitation rejects PG&E’s request to be allowed to revise prior year escalation based on newly discovered historical inflation values.</p>	<p><u>PG&E opening comments on Proposed Decision, pages 3-4.</u></p>	
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<p>3. RESOURCE ADEQUACY SUBSTITUTION COSTS</p> <p>TURN noted that PG&E's application and testimony calculated substitution capacity costs and capacity benefits of Diablo Canyon using 2025 Forecast Market Price Benchmark (MPB) for System Resource Adequacy (RA). TURN supported the use of this valuation method but noted that the 2025 forecast values were "wildly inflated" and pointed to the recently adopted changes in D.25-06-049 that would result in much lower 2025 System RA MPB values. TURN also urged the Commission to consider adopting monthly RA values once they are developed in R.25-02-005.</p> <p>The Decision approves the use of the revised RA MPB to calculate substitution capacity costs and takes note of the "substantial modifications to the RA MPB methodology" adopted in D.25-06-049 that lowered the requested Diablo Canyon revenue requirement by almost \$28 million.</p>	<p><u>Ex. TURN-1, Testimony of William Monsen, pages 22-32</u></p> <p><u>TURN opening brief, pages 8-10</u></p> <p><u>TURN opening comments on PG&E Update Testimony, pages 1-2.</u></p> <p><u>D.25-12-007, pages 44-45.</u></p>	
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<p>4. VOLUMETRIC PERFORMANCE FEES</p> <p>TURN identified significant concerns regarding PG&E's Volumetric Performance Fees (VPF) spending plan including the failure to demonstrate an alignment with the guiding principle of affordability adopted in D.25-06-002. TURN also identified opportunities for PG&E to use VPFs applied to "Safety and Risk" and Power Generation programs to benefit shareholders rather than support incremental work that benefits ratepayers. TURN additionally argued that the Commission has the authority to modify or reject PG&E's VPF spending plan, a position opposed by PG&E and the Coalition of California Utility Employees.</p> <p>In response to TURN's concerns about the use of VPFs to cover selective overspending, PG&E agreed to limit the application of VPFs for "Safety and Risk" programs where spending in both the Major Work Category and Maintenance Activity Type are above authorized imputed amounts. In its discussion of this issue, the Decision notes this commitment from PG&E.</p> <p>Consistent with TURN's arguments, the Decision affirms that the Commission has the ability to "modify or reject PG&E's proposed</p>	<p><u>Ex. TURN-1, Testimony of William Monsen, pages 33-52</u></p> <p><u>TURN opening brief, pages 15-31</u></p> <p><u>TURN reply brief, pages 7-14</u></p> <p><u>TURN opening comments on Proposed Decision, pages 3-11</u></p> <p><u>TURN reply comments on Proposed Decision, pages 1-3</u></p> <p><u>Ex. PG&E-3, PG&E rebuttal testimony, page 6-21.</u></p> <p><u>PG&E opening brief, page 50</u></p> <p><u>D.25-12-007, page 73</u></p>	
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<p>spending” of VPFs (page 71). The Decision found TURN’s concerns regarding potential shareholder benefits to be “well-intentioned but overly speculative” (page 72) The Decision agreed with TURN that PG&E failed to adequately explain how VPF spending aligns with the principle of reducing upward pressure on rates as required in D.25-06-002. Based on TURN’s critique, the Decision encourages PG&E “to provide more to provide more quantitative analysis and detail in future DCPP cost recovery applications making the case for how each VPF-funded program provides net benefit to ratepayers.” (page 73)</p>	<p><u>D.25-12-007, pages 71-74</u></p>	
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor’s Assertion	CPUC Discussion
<p>a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?²</p>	Y	
<p>b. Were there other parties to the proceeding with positions similar to yours?</p>	Y	
<p>c. If so, provide name of other parties:</p> <p>Energy Producers and Users Coalition (EPUC), the Alliance for Nuclear Responsibility (A4NR)</p>		
<p>d. Intervenor’s claim of non-duplication:</p> <p>TURN presented testimony on a wide range of issues in this proceeding and provided a detailed showing on each of these issues. In particular, TURN’s</p>		

² 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.

Intervenor's Assertion	CPUC Discussion
<p>a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?²</p>	<p>Y</p>
<p>presentation on Fixed Management Fees and Volumetric Performance Fees was far more comprehensive than any other party and included extensive analysis that was not provided by other intervenors. In addition, TURN presented unique evidence and arguments on the major issues it addressed (RA Substitution Capacity costs, Fixed Management Fees, Transition Costs, Volumetric Performance Fees). TURN did engage in some coordination with Cal Advocates to ensure complementary alignment of positions.</p> <p>To the extent that any duplication between parties occurred, it was unavoidable due to the nature of the litigation process and the array of issues addressed. TURN worked diligently to ensure that its involvement uniquely influenced the outcome of the final Decision.</p>	

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):

Intervenor's Assertion	CPUC Discussion
<p>a. Intervenor's claim of cost reasonableness:</p> <p>As demonstrated in the substantial contribution section, TURN's participation had a material impact on the outcome of the final decision. TURN's contributions include the following:</p> <ul style="list-style-type: none"> - Requiring PG&E to disclose, in future proceedings, whether PG&E seeks to shift the burden of any license renewal or transition costs from taxpayers to ratepayers and why such costs are eligible for recovery in rates. - Preventing PG&E from proposing a new methodology for escalation of the Fixed Management Fee in future proceedings and limiting changes to escalation since the last adopted values. 	

CPUC Discussion	
<ul style="list-style-type: none">- Using updated Market Price Benchmarks to measure the cost of substitution capacity that lowered the revenue requirement by almost \$28 million.- Requiring PG&E to provide more quantitative analysis and detail in future cost recovery applications showing how expenditures of Volumetric Performance Fees are providing net benefits to ratepayers. <p>Given these specific contributions, the benefits associated with TURN's participation far exceed the cost of TURN's participation in this proceeding. TURN's claim should be found to be reasonable.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>TURN devoted the minimum number of hours to reviewing rulings, drafting pleadings, developing testimony, reading comments submitted by other parties, and evaluating proposed decisions. Given the level of success achieved by TURN in this proceeding, the amount of time devoted by staff to the process should be found to be fully reasonable.</p>	
<p>Reasonableness of Staffing</p> <p><u>Matthew Freedman</u></p> <p>TURN's lead attorney was Matthew Freedman. Mr. Freedman was responsible for the development of TURN's overall strategy in this proceeding. Mr. Freedman drafted all formal pleadings, assisted with discovery, worked with TURN's expert on the development of testimony, attended the Prehearing conference, represented TURN at evidentiary hearings, drafted TURN's briefs and comments, and participated in <i>ex parte</i> meetings.</p>	
<p><u>William Monsen</u></p> <p>Mr. Monsen, an external consultant to TURN, served as an expert witness on all issues covered by TURN in this proceeding. Mr. Monsen drafted discovery, sponsored two volumes of written testimony, and provided feedback to TURN's attorney on written pleadings addressing the issues within his scope. Mr. Monsen also represented TURN at the Oral Argument due to the unavailability of TURN's attorney.</p> <p><u>Time spent on Ex Parte communications</u></p> <p>TURN's request includes hours devoted to <i>ex parte</i> meetings. These hours include time spent making the initial request, preparing for the meetings,</p>	

CPUC Discussion
<p>participating in the meetings, and drafting the required post-meeting <i>ex parte</i> notices. These notices cannot reasonably be prepared by non-attorney staff due to the need to accurately summarize the topics addressed. The Commission should find that hours spent on these <i>ex parte</i> communications represent the “reasonable costs of preparation for and participation in a hearing or proceeding.” (Cal. Pub. Util. Code §1803) and that hours spent by advocates reflect costs “incurred by the customer in preparing or presenting” (§1802(j)) TURN’s arguments to the Commission.</p> <p>As noted in TURN’s <i>ex parte</i> notices, the primary subject of these meetings was to express concerns about elements of the Proposed Decision that addressed Fixed Management Fee escalation, Transition Costs, and the Volumetric Performance Fees. The final decision made adjustments favorable to TURN’s position to the sections on Fixed Management Fee escalation and Transition costs. (See Rev 1 Proposed Decision, December 2, 2025). The time devoted to drafting TURN’s notices relating to <i>ex parte</i> meetings are required by law, include information that is substantive in nature (description of topics discussed) and must be signed by the attorney representing the party (cannot be signed by other staff).</p> <p>The Commission has routinely approved compensation for <i>ex parte</i> activities by intervenors in decisions dating back for more than 20 years. A sampling of prior decisions awarding compensation for time devoted to <i>ex parte</i> communications include (but are not limited to) D.25-10-059, D.24-09-049, D.24-01-024, D.23-10-013, D.23-06-045, D.22-08-050, D.22-08-010, D.22-06-018, D.21-12-051, D.21-08-033, D.21-06-016, D.21-07-017, D.21-04-013, D.19-10-020, D.19-10-018, D.19-08-032, D.19-07-020, D.19-03-005, D.18-11-043, D.18-04-021, D.15-08-023, D.12-08-041.</p> <p><u>Compensation Request</u></p> <p>TURN’s request also includes 9.5 hours devoted to the preparation of compensation-related filings. The time devoted to this compensation request is appropriate and should be found to be reasonable.</p>
<p>c. Allocation of hours by issue:</p> <p>TURN has allocated all attorney time by issue area or activity, as evident on our attached timesheets. The following codes relate to specific substantive issue and activity areas addressed by TURN. TURN also provides an approximate breakdown of the number of hours spent on each task and the percentage of total hours devoted to each category.</p>
<p>General Participation (GP) – 37.75 hours – 11.43% of total</p> <p>General Participation work essential to participation that typically spans multiple issues and/or would not vary with the number of issues that</p>

	CPUC Discussion
<p>TURN addresses. This includes reviewing multi-issue pleadings, testimony submitted by PG&E and other tasks not allocable to a particular issue.</p> <p>Brief General (BRIEFGEN) – 15.5 hours – 4.69% of total</p> <p>Work developing TURN's opening and reply briefs, comments on fall update testimony, and comments on the Proposed Decision on issues not specifically captured by other codes.</p> <p>Coordination (COORD) – 2.5 hours – 0.76% of total</p> <p>Coordination with other parties to inform TURN's efficient and effective participation and minimize duplication. Includes preliminary outreach regarding possible settlement.</p> <p>CPUC-ordered activities (CPUC) – 22.75 hours – 6.89% of total</p> <p>Time devoted to reviewing CPUC rulings and Proposed Decisions, preparing for (and participating in) the Prehearing Conference, participating in CPUC-required meet-and-confer, and preparation and participation in the December 1 oral argument.</p> <p>Discovery (DISC) – 24.5 hours – 7.42% of total</p> <p>Development of discovery requests and responses by TURN staff. Review of discovery responses by PG&E and other parties.</p> <p>Evidentiary Hearings (EH) – 9.25 hours – 2.80% of total</p> <p>Preparation for, and participation in, CPUC evidentiary hearings in this proceeding.</p> <p>Ex Parte (EXPARTE) – 5.5 hours – 1.67% of total</p> <p>Preparation for, participation in, and reporting on Ex Parte meetings with Commissioner Advisors.</p> <p>Fixed Management Fee (FMF) – 85.00 hours – 25.74% of total</p> <p>Review of PG&E's Fixed Management Fee escalation proposal, development of alternative data to support the methodology adopted in D.24-12-033, evaluation of revised data presented by PG&E prior to (and after) evidentiary hearings and additional review of discontinuities in generation capital escalation data presented by PG&E.</p> <p>Resource Adequacy Capacity Substitution Costs (RA) – 24.50 hours – 7.42% of total</p> <p>Work relating to the use of the recently revised Resource Adequacy Market Price Benchmarks to value Diablo Canyon capacity substitution and capacity benefits.</p> <p>Testimony General (TESTGEN) – 21.00 hours – 6.36% of total</p>	

CPUC Discussion
<p>Work developing TURN's testimony on issues not specifically captured by other codes.</p> <p>Transition Costs (TRANSITION) – 16.75 hours – 5.07% of total</p> <p>Work on determining whether PG&E's transition costs to be recovered via the \$1.4 billion taxpayer-funded loan were also being recovered in customer rates and developing recommendations for greater transparency and accountability.</p> <p>Volumetric Performance Fees (VPF) – 65.25 hours – 19.76% of total</p> <p>Evaluation of PG&E's 2026 Volumetric Performance Fees spending plan, development of recommendations to prevent impermissible shareholder enrichment, and proposals for ensuring that VPF spending aligns with affordability goals.</p> <p>Compensation – 9.5 hours</p> <p>Time spent on the preparation of compensation-related pleadings.</p> <p>-----</p> <p>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.</p>

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Matthew Freedman, TURN Attorney	2025	148.00	\$795	D.25-10-059	\$117,660.00			
William Monsen, MRW & Associates	2025	182.25	\$410	D.25-10-059 + Res ALJ-393; See Comment #1	\$74,722.50			
<i>Subtotal: \$192,382.50</i>						<i>Subtotal: \$</i>		

CLAIMED						CPUC AWARD					
OTHER FEES											
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):											
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$			
<i>Subtotal: \$</i>						<i>Subtotal: \$</i>					
INTERVENOR COMPENSATION CLAIM PREPARATION **											
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$			
Matthew Freedman, TURN Attorney	2025	1.00	\$397.5	50% of 2025 Hourly Rate	\$397.50						
Matthew Freedman, TURN Attorney	2026	8.50	\$410	50% of 2026 Hourly Rate; See Comment #2	\$3,485.00						
<i>Subtotal: \$3,882.50</i>						<i>Subtotal: \$</i>					
COSTS											
#	Item	Detail			Amount	Amount					
<i>Subtotal: \$0</i>						<i>Subtotal: \$</i>					
<i>TOTAL REQUEST: \$196,265.00</i>						<i>TOTAL AWARD: \$</i>					

*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate

ATTORNEY INFORMATION

Attorney	Date Admitted to CA BAR ³	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Matthew Freedman	March 29, 2001	214812	No

³ 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
Attachment 1	Certificate of Service
Attachment 2	Attorney and Experts Time Sheet Detail
Attachment 3	MRW consulting agreement and April 2025 invoice
Attachment 4	TURN hours Allocated by Issue
Comment #1	<p>2025 Hourly Rate for William Monsen</p> <p>TURN requests that the Commission adopt a 2025 hourly rate of \$410 for TURN External Consultant William Monsen. This rate is equal to the rate authorized by the Commission in D.25-10-059 for Mr. Monsen's work for 2024 (\$395) adjusted by the annual escalation methodology adopted in Resolution (Res.) ALJ-393.</p> <p>The annual escalation methodology adopted in Res. ALJ-393 is based on the annual percentage change in the Bureau of Labor Statistics Employment Cost Index, Table 5, for the Occupational Group "Management, Professional, and Related excluding Incentive Paid Occupations." (Res. ALJ-393, p. 4; Intervenor Compensation Market Rate Study, Final Report, p. 8). The percent change for this occupational group for the 12-months ended December 2024 is 3.46% (See https://www.bls.gov/news.release/eci.t05.htm). The application of this escalation to Mr. Monsen's 2024 rate yields \$408.67 which is rounded to \$410 (the nearest \$5 increment).</p> <p>Mr. Monsen charged TURN \$410 for his work in 2025. In attachment 3, TURN provides a written agreement for 2025 assigning Mr. Monsen a \$410 hourly rate and an invoice for April 2025 showing a \$410 hourly rate. These documents demonstrate that TURN was billed the rates being sought in this compensation request for Mr. Monsen's services in both years.</p>
Comment #2	<p>2026 Hourly Rate for Matthew Freedman</p> <p>TURN requests that the Commission adopt a 2026 hourly rate of \$820 for TURN Staff Attorney Matthew Freedman. This rate is equal to the rate authorized by the Commission in D.25-10-059 for Mr. Freedman's work in 2025 (\$795) adjusted by the annual escalation methodology adopted in Resolution (Res.) ALJ-393.</p> <p>The annual escalation methodology adopted in Res. ALJ-393 is based on the annual percentage change in the Bureau of Labor Statistics Employment</p>

Attachment or Comment #	Description/Comment
	<p>Cost Index, Table 5, for the Occupational Group “Management, Professional, and Related excluding Incentive Paid Occupations.” (Res. ALJ-393, p. 4; Intervenor Compensation Market Rate Study, Final Report, p. 8). The percent change for this occupational group for the 12-months ended September 2025 is 3.3% (See https://www.bls.gov/news.release/eci.t05.htm). At the time of filing this request, the latest 12-month data released by BLS ended with September 2025. The application of this escalation to Mr. Freedman’s 2025 rate yields \$821.23 which is rounded to \$820 (the nearest \$5 increment).</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))

A. Opposition: Did any party oppose the Claim?	
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If so:

Party	Reason for Opposition	CPUC Discussion

B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?	
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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.25-12-007
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 75th 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

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D.25-12-007		
Proceeding(s):	A.25-03-015		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	02/06/2026	\$196,265		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Matthew	Freedman	Attorney	\$795	2025	
Matthew	Freedman	Attorney	\$820	2026	
William	Monsen	Expert	\$410	2025	

(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))

Revised March 2023

Attachment 2

Attorney and Experts Time Sheet Detail

A.25-03-015 (Diablo Canyon) TURN Compensation Claim
Attorney Time Sheets

Staff	Case #	Code	Description	Date	Time
Matthew Freedman	A25-03-015	GP	Review of new PG&E DCPP cost recovery application	3/28/25	1.00
Matthew Freedman	A25-03-015	GP	Review of new PG&E DCPP cost recovery application, testimony, workpapers	3/31/25	1.00
Matthew Freedman	A25-03-015	GP	Review of new PG&E DCPP cost recovery application, testimony, workpapers	4/1/25	0.50
Matthew Freedman	A25-03-015	GP	Review of PG&E application, testimony and workpapers	4/18/25	1.00
Matthew Freedman	A25-03-015	GP	Review of PG&E application, testimony and workpapers	4/24/25	2.50
Matthew Freedman	A25-03-015	GP	Drafting of TURN protest to PG&E application	4/24/25	3.00
Matthew Freedman	A25-03-015	GP	Review and revise TURN protest	4/29/25	0.50
Matthew Freedman	A25-03-015	GP	Review of protests filed by other parties	5/6/25	0.75
Matthew Freedman	A25-03-015	GP	Review of PG&E testimony	5/21/25	1.00
Matthew Freedman	A25-03-015	GP	Review and execution of NDA	5/22/25	0.25
Matthew Freedman	A25-03-015	GP	Review of PG&E testimony	5/22/25	1.00
Matthew Freedman	A25-03-015	DISC	Drafting TURN DR1 to PG&E	5/22/25	3.50
Matthew Freedman	A25-03-015	FMF	Review of PG&E confidential workpapers	5/23/25	0.50
Matthew Freedman	A25-03-015	FMF	Email to PG&E re: confidential issues (conflict between workpapers and testimony)	5/23/25	0.25
Matthew Freedman	A25-03-015	DISC	Drafting TURN DR2 to PG&E	5/24/25	1.00
Matthew Freedman	A25-03-015	DISC	Drafting TURN DR2 to PG&E	5/27/25	2.50
Matthew Freedman	A25-03-015	DISC	Review and revise TURN DR2 to PG&E	5/28/25	0.25
Matthew Freedman	A25-03-015	CPUC	Review of ALJ PHC agenda handout	5/28/25	0.25
Matthew Freedman	A25-03-015	CPUC	Review case materials in preparation for PHC	5/30/25	0.50
Matthew Freedman	A25-03-015	CPUC	Participation in PHC (Includes joining Webex 15 minutes early for audio/video check as directed by ALJ)	5/30/25	1.50
Matthew Freedman	A25-03-015	DISC	Initial review of PG&E responses to TURN DR1	6/6/25	0.75
Matthew Freedman	A25-03-015	Comp	Drafting of compensation NOI and request for finding of significant financial hardship	6/6/25	1.00
Matthew Freedman	A25-03-015	DISC	Review of PG&E responses to TURN DR1	6/11/25	0.50
Matthew Freedman	A25-03-015	DISC	Initial review of PG&E responses to TURN DR2	6/11/25	0.50
Matthew Freedman	A25-03-015	TESTGEN	Meeting w/Bill Monsen to discuss testimony issues	6/16/25	1.00
Matthew Freedman	A25-03-015	DISC	Draft TURN DR3 to PG&E	6/24/25	0.50
Matthew Freedman	A25-03-015	RA	Correspondance with Bill Monsen re: RA MPB issues	6/30/25	0.25
Matthew Freedman	A25-03-015	DISC	Review and revise TURN DR4 to PG&E	7/1/25	0.25
Matthew Freedman	A25-03-015	FMF	Review of CPUC Confidentiality claims, email to PG&E requesting clarification	7/3/25	0.25
Matthew Freedman	A25-03-015	COORD	Meeting w/Cal Advocates to discuss case coordination and shared issues	7/3/25	0.50
Matthew Freedman	A25-03-015	COORD	Follow up call w/Bill Monsen to discuss coordination with Cal Advocates	7/3/25	0.50
Matthew Freedman	A25-03-015	TESTGEN	Call w/Bill Monsen re: Diablo testimony issues	7/3/25	0.50
Matthew Freedman	A25-03-015	DISC	Review and revise TURN DR5 to PG&E	7/7/25	0.50
Matthew Freedman	A25-03-015	DISC	Review PG&E questions re: TURN DR4, communication w/Bill Monsen re: DR4	7/8/25	0.25
Matthew Freedman	A25-03-015	VPF	Initial review of PG&E supplemental testimony and errata	7/8/25	0.50
Matthew Freedman	A25-03-015	DISC	Review of PG&E responses to TURN DR4	7/9/25	0.50
Matthew Freedman	A25-03-015	VPF	Drafting email to Bill Monsen re: VPF supplemental testimony issues	7/9/25	0.50
Matthew Freedman	A25-03-015	DISC	Request to PG&E to update TURN DR 1,013	7/14/25	0.25
Matthew Freedman	A25-03-015	FMF	Review and revise Monsen testimony - Fixed Management Fees	7/18/25	0.75
Matthew Freedman	A25-03-015	RA	Review and revise Monsen testimony - Resource Adequacy	7/18/25	0.75
Matthew Freedman	A25-03-015	VPF	Review and revise Monsen testimony - VPFs	7/18/25	1.50
Matthew Freedman	A25-03-015	TRANSITION	Review and revise Monsen testimony - Transition Costs	7/18/25	0.50
Matthew Freedman	A25-03-015	TRANSITION	Review and revise Monsen testimony - Transition Costs	7/21/25	1.00
Matthew Freedman	A25-03-015	VPF	Review and revise Monsen testimony - VPFs	7/21/25	1.00
Matthew Freedman	A25-03-015	TESTGEN	Call w/Bill Monsen to discuss testimony issues	7/21/25	0.50
Matthew Freedman	A25-03-015	CPUC	Review and revise draft exhibit list	7/22/25	0.25
Matthew Freedman	A25-03-015	TESTGEN	Review and revise Monsen testimony - total costs of DCPP operations	7/23/25	0.50
Matthew Freedman	A25-03-015	FMF	Review and revise Monsen testimony - Fixed Management Fees	7/23/25	1.25
Matthew Freedman	A25-03-015	RA	Review and revise Monsen testimony - Resource Adequacy	7/23/25	0.75
Matthew Freedman	A25-03-015	VPF	Review and revise Monsen testimony - VPFs	7/23/25	2.00
Matthew Freedman	A25-03-015	TRANSITION	Review and revise Monsen testimony - Transition Costs	7/23/25	0.50
Matthew Freedman	A25-03-015	VPF	Call w/Bill Monsen to discuss VPF issues	7/23/25	0.50
Matthew Freedman	A25-03-015	TESTGEN	Review and revise Monsen testimony - total costs of DCPP operations	7/24/25	0.50
Matthew Freedman	A25-03-015	FMF	Review and revise Monsen testimony - Fixed Management Fees	7/24/25	0.25
Matthew Freedman	A25-03-015	RA	Review and revise Monsen testimony - Resource Adequacy	7/24/25	0.50
Matthew Freedman	A25-03-015	VPF	Review and revise Monsen testimony - VPFs	7/24/25	1.25
Matthew Freedman	A25-03-015	TRANSITION	Review and revise Monsen testimony - Transition Costs	7/24/25	0.50
Matthew Freedman	A25-03-015	VPF	Review and revise Monsen testimony - Transition Costs	7/24/25	0.50
Matthew Freedman	A25-03-015	TESTGEN	Review and revise Monsen testimony - Attachments	7/24/25	1.00
Matthew Freedman	A25-03-015	GP	Initial review of testimony served by other parties	7/25/25	1.00
Matthew Freedman	A25-03-015	VPF	Review of Monsen workpapers - VPF issues	7/30/25	0.50
Matthew Freedman	A25-03-015	COORD	Review and respond to settlement request from PG&E	8/18/25	0.25
Matthew Freedman	A25-03-015	GP	Review PG&E rebuttal testimony	8/19/25	0.25
Matthew Freedman	A25-03-015	FMF	Review PG&E rebuttal testimony - Fixed Management Fee Escalation	8/19/25	0.50
Matthew Freedman	A25-03-015	RA	Review and revise PG&E rebuttal testimony - RA costs	8/19/25	0.50
Matthew Freedman	A25-03-015	VPF	Review and revise PG&E rebuttal testimony - Volumetric Performance Fees	8/19/25	1.00
Matthew Freedman	A25-03-015	TRANSITION	Review PG&E rebuttal testimony - Transition/license renewal Costs	8/19/25	0.25
Matthew Freedman	A25-03-015	DISC	Draft TURN DR6 - completeness of showing	8/19/25	0.25
Matthew Freedman	A25-03-015	RA	Draft TURN DR6 - RA issues	8/19/25	0.25
Matthew Freedman	A25-03-015	DISC	Draft TURN DR6 - property taxes	8/19/25	0.25
Matthew Freedman	A25-03-015	FMF	Draft TURN DR6 - Fixed Management Fee	8/19/25	0.50
Matthew Freedman	A25-03-015	VPF	Draft TURN DR6 - VPF plan	8/19/25	1.75
Matthew Freedman	A25-03-015	CPUC	Review draft documents provided by PG&E in advance of Rule 13.9 meet and confer	8/20/25	0.25
Matthew Freedman	A25-03-015	CPUC	Participation in Rule 13.9 meet and confer with all parties	8/20/25	0.50
Matthew Freedman	A25-03-015	DISC	Review and revise TURN DR6	8/20/25	0.25
Matthew Freedman	A25-03-015	EH	Review and revise draft cross examination matrix and exhibit list	8/20/25	0.25
Matthew Freedman	A25-03-015	EH	Call w/Bill Monsen to discuss TURN case strategy and hearings	8/20/25	0.25
Matthew Freedman	A25-03-015	CPUC	Review Joint meet and confer report	9/4/25	0.25
Matthew Freedman	A25-03-015	DISC	Review PG&E responses to TURN DR6	9/4/25	1.00
Matthew Freedman	A25-03-015	EH	Provide information to CPUC staff re: upcoming hearing	9/4/25	0.25
Matthew Freedman	A25-03-015	EH	Review ALJ ruling re: hearing protocols	9/4/25	0.25
Matthew Freedman	A25-03-015	EH	Review of PG&E data responses and development of content for hearing exhibit in lieu of cross	9/5/25	2.00
Matthew Freedman	A25-03-015	FMF	Review of PG&E exhibit on FME escalation and workpapers (compare with prior forecast data)	9/8/25	1.00
Matthew Freedman	A25-03-015	EH	Final review and revise TURN exhibit in lieu of cross examination	9/8/25	0.50
Matthew Freedman	A25-03-015	EH	Attendance/participation at evidentiary hearing (including required attendance prior to 10am start time)	9/9/25	2.00
Matthew Freedman	A25-03-015	FMF	Review of additional TURN exhibit on FME escalation	9/9/25	0.25
Matthew Freedman	A25-03-015	EH	Attendance/participation at evidentiary hearing to admit TURN exhibits	9/10/25	0.50
Matthew Freedman	A25-03-015	FMF	Review Q from ED staff re: FME escalation rates, communication with Bill Monsen	9/10/25	0.25
Matthew Freedman	A25-03-015	CPUC	Review of ALJ ruling re: additional information for FME escalation	9/25/25	0.25
Matthew Freedman	A25-03-015	BRIEFGEN	Drafting of TURN opening brief - Costs not collected in rates	9/26/25	1.50
Matthew Freedman	A25-03-015	TRANSITION	Drafting of TURN opening brief - Transition costs and DWR loan	9/26/25	2.50
Matthew Freedman	A25-03-015	FMF	Drafting of TURN opening brief - Fixed Management Fee escalation	9/26/25	2.00
Matthew Freedman	A25-03-015	RA	Drafting of TURN opening brief - Resource Adequacy costs	9/29/25	1.50
Matthew Freedman	A25-03-015	VPF	Drafting of TURN opening brief - VPF spending plan	9/30/25	8.00
Matthew Freedman	A25-03-015	FMF	Review and revise TURN opening brief - FME escalation	10/1/25	1.00
Matthew Freedman	A25-03-015	RA	Review and revise TURN opening brief - RA costs	10/1/25	0.50
Matthew Freedman	A25-03-015	TRANSITION	Review and revise TURN opening brief - Transition/license renewal costs	10/1/25	0.50
Matthew Freedman	A25-03-015	VPF	Review and revise TURN opening brief - VPF plan	10/1/25	2.00
Matthew Freedman	A25-03-015	RA	Review of revised Market Price Benchmarks released by ED	10/1/25	0.25
Matthew Freedman	A25-03-015	GP	Initial review of opening briefs filed by various parties	10/2/25	1.50
Matthew Freedman	A25-03-015	CPUC	Review ALJ ruling re: additional testimony on FME escalation	10/3/25	0.25
Matthew Freedman	A25-03-015	FMF	Communication w/Bill Monsen re: ALJ ruling and TURN testimony	10/3/25	0.25
Matthew Freedman	A25-03-015	GP	Review of PG&E update testimony	10/8/25	1.50
Matthew Freedman	A25-03-015	RA	Review of PG&E update testimony workpapers - RA MPBs	10/8/25	0.25
Matthew Freedman	A25-03-015	FMF	Review of PG&E update testimony workpapers - FMF issues	10/8/25	0.25
Matthew Freedman	A25-03-015	RA	Drafting of TURN DR7 - RA values	10/8/25	0.75
Matthew Freedman	A25-03-015	RA	Drafting of TURN DR7 - RA values and Capacity Substitution costs	10/9/25	0.75
Matthew Freedman	A25-03-015	FMF	Drafting of TURN DR7 - FME escalation	10/9/25	0.75
Matthew Freedman	A25-03-015	FMF	Call w/Bill Monsen to discuss update testimony and case strategy re: FMFs	10/9/25	0.25
Matthew Freedman	A25-03-015	GP	Review PG&E opening brief	10/10/25	1.00
Matthew Freedman	A25-03-015	BRIEFGEN	Outline TURN reply brief	10/10/25	1.00
Matthew Freedman	A25-03-015	FMF	Drafting TURN reply brief - FMF escalation	10/14/25	1.50

A.25-03-015 (Diablo Canyon) TURN Compensation Claim
Attorney Time Sheets

Staff	Case #	Code	Description	Date	Time
Matthew Freedman	A25-03-015	VPF	Drafting TURN reply brief - VPF plan	10/14/25	1.50
Matthew Freedman	A25-03-015	VPF	Drafting TURN reply brief - VPF plan	10/15/25	3.50
Matthew Freedman	A25-03-015	RA	Discussion w/Bill Monsen re: testimony on MPB update	10/16/25	0.50
Matthew Freedman	A25-03-015	BRIEFGEN	Initial outline of opening comments on update testimony	10/16/25	0.50
Matthew Freedman	A25-03-015	TRANSITION	Drafting TURN reply brief - transition costs	10/16/25	1.00
Matthew Freedman	A25-03-015	GP	Review of draft PG&E motion to admit confidential exhibits under seal	10/16/25	0.25
Matthew Freedman	A25-03-015	DISC	Initial review of PG&E responses to TURN DR7	10/16/25	0.50
Matthew Freedman	A25-03-015	RA	Drafting TURN opening comments on update testimony - RA costs and benefits	10/17/25	3.00
Matthew Freedman	A25-03-015	FMF	Drafting TURN opening comments on update testimony - FMF escalation	10/19/25	1.25
Matthew Freedman	A25-03-015	RA	Drafting TURN opening comments on update testimony - RA costs and benefits	10/19/25	0.50
Matthew Freedman	A25-03-015	FMF	Review and revise Monsen supplemental testimony - FMF escalation	10/19/25	2.50
Matthew Freedman	A25-03-015	FMF	Review and revise Monsen supplemental testimony - FMF escalation	10/20/25	1.00
Matthew Freedman	A25-03-015	FMF	Drafting TURN reply brief - FMF escalation	10/20/25	1.00
Matthew Freedman	A25-03-015	RA	Review and revise TURN opening comments on update testimony - RA costs and benefits	10/20/25	0.50
Matthew Freedman	A25-03-015	FMF	Review and revise TURN opening comments on update testimony - FMF escalation	10/20/25	0.50
Matthew Freedman	A25-03-015	RA	Review and revise TURN opening comments on update testimony - RA costs and benefits	10/21/25	0.25
Matthew Freedman	A25-03-015	FMF	Review and revise TURN opening comments on update testimony - FMF escalation	10/21/25	0.25
Matthew Freedman	A25-03-015	GP	Review opening comments on fall update testimony filed by WEM, PAO, A4NR, CGNP, EPUC	10/21/25	0.50
Matthew Freedman	A25-03-015	FMF	Review and revise TURN reply brief - FMF escalation	10/22/25	0.50
Matthew Freedman	A25-03-015	VPF	Review and revise TURN reply brief - VPF plan	10/22/25	0.50
Matthew Freedman	A25-03-015	TRANSITION	Review and revise TURN reply brief - transition costs	10/22/25	0.50
Matthew Freedman	A25-03-015	GP	Review opening comments on update testimony filed by various parties	10/22/25	0.50
Matthew Freedman	A25-03-015	GP	Review reply briefs filed by PG&E and CUE	10/22/25	1.50
Matthew Freedman	A25-03-015	GP	Email to PG&E re: revised draft motion for admission of confidential exhibits	10/23/25	0.25
Matthew Freedman	A25-03-015	FMF	Review of revised TURN exhibit to address revisions to confidentiality	10/23/25	0.25
Matthew Freedman	A25-03-015	FMF	Drafting of TURN motion for admission of supplemental testimony	10/27/25	0.75
Matthew Freedman	A25-03-015	GP	Review of PG&E reply comments on update testimony	10/27/25	0.25
Matthew Freedman	A25-03-015	FMF	Review of PG&E October 27th reply testimony on FMF escalation	10/28/25	1.00
Matthew Freedman	A25-03-015	CPUC	Initial review of ALJ Chang PD	11/3/25	0.50
Matthew Freedman	A25-03-015	CPUC	Review of ALJ Chang PD	11/6/25	1.00
Matthew Freedman	A25-03-015	EXPARTE	Drafting of three-day advance notice of ex parte meetings	11/6/25	0.50
Matthew Freedman	A25-03-015	EXPARTE	Preparation for ex parte meetings with Commissioner Houck and Baker staff	11/12/25	2.00
Matthew Freedman	A25-03-015	EXPARTE	Preparation for ex parte meetings with Commissioner Houck and Baker staff	11/13/25	1.00
Matthew Freedman	A25-03-015	EXPARTE	Ex Parte meeting with Commissioner Houck staff	11/13/25	0.50
Matthew Freedman	A25-03-015	EXPARTE	Ex Parte meeting with Commissioner Baker staff	11/13/25	0.50
Matthew Freedman	A25-03-015	EXPARTE	Drafting of ex parte notice including description of meeting contents and TURN positions (attorney required)	11/13/25	0.75
Matthew Freedman	A25-03-015	TRANSITION	Drafting of TURN opening comments on ALJ PD - Transition Cost issues	11/14/25	1.75
Matthew Freedman	A25-03-015	FMF	Drafting of TURN opening comments on ALJ PD - FMF issues	11/14/25	1.50
Matthew Freedman	A25-03-015	VPF	Drafting of TURN opening comments on ALJ PD - VPF issues	11/16/25	4.00
Matthew Freedman	A25-03-015	VPF	Drafting of TURN opening comments on ALJ PD - VPF issues	11/17/25	1.50
Matthew Freedman	A25-03-015	FMF	Drafting of TURN opening comments on ALJ PD - FMF issues	11/17/25	1.00
Matthew Freedman	A25-03-015	TRANSITION	Drafting of TURN opening comments on ALJ PD - Transition Cost issues	11/17/25	1.00
Matthew Freedman	A25-03-015	VPF	Review and revise TURN opening comments on ALJ PD - VPF issues	11/20/25	0.50
Matthew Freedman	A25-03-015	FMF	Review and revise TURN opening comments on ALJ PD - FMF issues	11/20/25	0.50
Matthew Freedman	A25-03-015	TRANSITION	Review and revise TURN opening comments on ALJ PD - Transition Cost issues	11/20/25	0.50
Matthew Freedman	A25-03-015	GP	Review opening comments on the PD by all parties	11/20/25	1.50
Matthew Freedman	A25-03-015	VPF	Drafting of TURN reply comments on ALJ PD - VPF issues	11/20/25	1.00
Matthew Freedman	A25-03-015	FMF	Drafting of TURN opening comments on ALJ PD - FMF issues	11/20/25	0.50
Matthew Freedman	A25-03-015	TRANSITION	Drafting of TURN opening comments on ALJ PD - Transition Cost issues	11/20/25	0.50
Matthew Freedman	A25-03-015	VPF	Drafting of TURN reply comments on ALJ PD - VPF issues	11/22/25	1.50
Matthew Freedman	A25-03-015	EXPARTE	Drafting of ex parte reply comments on ALJ PD	11/25/25	1.00
Matthew Freedman	A25-03-015	GP	Review reply comments filed by other parties - required for oral argument preparation	11/25/25	0.75
Matthew Freedman	A25-03-015	CPUC	Drafting oral argument script	11/26/25	2.25
Matthew Freedman	A25-03-015	CPUC	Revisions to oral argument script	12/1/25	0.50
Matthew Freedman	A25-03-015	CPUC	Meeting with Bill Monsen to prepare for oral argument	12/1/25	1.00
Matthew Freedman	A24-03-018	comp	Drafting of compensation request	2/3/26	3.50
Matthew Freedman	A24-03-018	comp	Drafting of compensation request	2/4/26	3.00
Matthew Freedman	A24-03-018	comp	Drafting of compensation request	2/5/26	2.00
William Monsen	A25-03-015	GP	Note to M. Freedman re: New application from PG&E	3/31/25	0.25
William Monsen	A25-03-015	GP	Note to M. Freedman re: Review of testimony to identify issues for protest	4/15/25	0.25
William Monsen	A25-03-015	GP	Note to M. Freedman re: Confidential documents and work papers for proceeding	4/21/25	0.25
William Monsen	A25-03-015	GP	Notes to M. Freedman re: NDA (including signing NDA) and issues for protest	4/24/25	1.00
William Monsen	A25-03-015	GP	Review initial PG&E testimony	4/24/25	3.00
William Monsen	A25-03-015	GP	Note to M. Freedman re: Check-in call re: DCPP proceeding	6/12/25	0.25
William Monsen	A25-03-015	GP	Review PG&E testimony and work papers	6/15/25	2.50
William Monsen	A25-03-015	RA	Note to David Howarth re: Forecast of Resource Adequacy prices in CA	6/15/25	0.25
William Monsen	A25-03-015	DISC	Draft data request	6/15/25	1.25
William Monsen	A25-03-015	DISC	Note to M. Freedman re: Review of testimony and data request	6/15/25	0.25
William Monsen	A25-03-015	TESTGEN	M. Freedman re: Status and issues in proceeding; next steps for testimony	6/16/25	1.25
William Monsen	A25-03-015	DISC	Notes to M. Freedman re: Next data requests and status of review	6/24/25	0.50
William Monsen	A25-03-015	FMF	Review data requests re: capital escalators	6/24/25	0.50
William Monsen	A25-03-015	DISC	Review data request responses	6/24/25	2.25
William Monsen	A25-03-015	DISC	Note to M. Freedman re: PG&E data request responses	6/25/25	0.50
William Monsen	A25-03-015	TESTGEN	Analyze trends of spending by PG&E	6/25/25	3.50
William Monsen	A25-03-015	VPF	Note to David Howarth re: Volumetric Performance Fee issues	6/25/25	0.25
William Monsen	A25-03-015	DISC	Analyze PG&E responses to data requests	6/26/25	1.50
William Monsen	A25-03-015	TESTGEN	Note to M. Freedman re: Review of cost trends	6/26/25	0.75
William Monsen	A25-03-015	TESTGEN	Draft data request re: Historic costs	6/26/25	0.50
William Monsen	A25-03-015	VPF	Note to David Howarth re: VPFs	6/26/25	0.25
William Monsen	A25-03-015	VPF	Note to David Howarth re: VPF issues	6/27/25	0.25
William Monsen	A25-03-015	VPF	Note to M. Freedman re: Assistance with Volumetric Performance Fee issues	6/27/25	0.25
William Monsen	A25-03-015	COORD	Note to M. Freedman re: Meeting with Cal Advocates	6/27/25	0.25
William Monsen	A25-03-015	FMF	Model Fixed Management Fee proposal	6/27/25	1.50
William Monsen	A25-03-015	TESTGEN	Outline and begin to draft testimony	6/27/25	2.25
William Monsen	A25-03-015	FMF	Draft testimony - FMF issues	6/29/25	3.25
William Monsen	A25-03-015	VPF	Note to David Howarth re: Volumetric Performance Fee issues	6/30/25	0.75
William Monsen	A25-03-015	RA	Draft testimony - RA issues	6/30/25	4.00
William Monsen	A25-03-015	RA	Notes to M. Freedman re: RA prices	6/30/25	0.50
William Monsen	A25-03-015	TRANSITION	Draft testimony - Transition costs	7/2/25	2.50
William Monsen	A25-03-015	TESTGEN	Note to David Howarth re: Status of draft testimony	7/2/25	0.25
William Monsen	A25-03-015	CPUC	Review scoping memo	7/3/25	0.25
William Monsen	A25-03-015	FMF	Draft testimony - FMF issues	7/3/25	3.00
William Monsen	A25-03-015	COORD	M. Freedman, Cal Advocates re: Issues in proceeding	7/3/25	0.50
William Monsen	A25-03-015	TESTGEN	M. Freedman re: Follow-up to call with Cal Advocates; next steps	7/3/25	0.50
William Monsen	A25-03-015	TESTGEN	Note to David Howarth re: Scoping memo and issues in testimony	7/3/25	0.50
William Monsen	A25-03-015	FMF	Examine confidentiality of prior PG&E filings of CPI	7/3/25	0.50
William Monsen	A25-03-015	TRANSITION	Review transition costs	7/3/25	0.75
William Monsen	A25-03-015	TRANSITION	Draft data request re: transition costs	7/3/25	0.50
William Monsen	A25-03-015	VPE	Note to David Howarth re: Next steps on VPF analysis	7/6/25	0.25
William Monsen	A25-03-015	TESTGEN	Note to M. Freedman re: Draft testimony	7/7/25	0.25
William Monsen	A25-03-015	RA	Draft testimony - RA issues	7/7/25	2.00
William Monsen	A25-03-015	FMF	Draft testimony - FMF issues	7/7/25	1.00
William Monsen	A25-03-015	DISC	Notes to M. Freedman re: Questions from PG&E requesting clarification of TURN data request	7/8/25	0.50
William Monsen	A25-03-015	GP	Review supplemental and errata testimony	7/8/25	1.50
William Monsen	A25-03-015	VPF	Notes to M. Freedman re: PG&E's supplemental and errata testimony	7/8/25	0.25
William Monsen	A25-03-015	VPF	Notes to M. Freedman re: PG&E supplemental testimony and next steps on testimony	7/9/25	0.50
William Monsen	A25-03-015	FMF	Notes to B. Finkelstein re: Escalation factors in current GRC	7/11/25	0.50

A.25-03-015 (Diablo Canyon) TURN Compensation Claim
Attorney Time Sheets

Staff	Case #	Code	Description	Date	Time
William Monsen	A25-03-015	FMF	Review of prior confidentiality claims re: escalators from last DCPP and GRCs; review PG&E GRC testimony and workpapers for escalation factors	7/11/25	1.50
William Monsen	A25-03-015	FMF	Note to M. Freedman re: PG&E's confidentiality claims in prior DCPP and GRCs, next steps on testimony	7/11/25	0.50
William Monsen	A25-03-015	VPF	Draft testimony - VPF issues	7/11/25	3.50
William Monsen	A25-03-015	FMF	Escalators available from S&P under subscription	7/11/25	0.50
William Monsen	A25-03-015	DISC	Review PG&E responses to TURN data requests	7/11/25	1.00
William Monsen	A25-03-015	VPF	Draft testimony - VPF issues	7/12/25	1.75
William Monsen	A25-03-015	RA	RA credit and pricing for DCPP	7/13/25	1.25
William Monsen	A25-03-015	DISC	Note to M. Freedman re: New data request	7/14/25	0.25
William Monsen	A25-03-015	DISC	Draft data request	7/14/25	0.50
William Monsen	A25-03-015	FMF	Draft testimony - FMF issues	7/14/25	2.00
William Monsen	A25-03-015	VPF	Draft testimony - VPF issues	7/14/25	1.00
William Monsen	A25-03-015	TESTGEN	Note to M. Freedman re: Next draft of testimony and schedule to complete project	7/14/25	0.50
William Monsen	A25-03-015	TESTGEN	Note to M. Freedman re: Next steps on draft testimony	7/17/25	0.25
William Monsen	A25-03-015	FMF	Draft testimony - FMF issues	7/17/25	4.25
William Monsen	A25-03-015	VPF	Note to M. Freedman re: PG&E's tracking of VPFs in SAP	7/17/25	0.25
William Monsen	A25-03-015	TESTGEN	Note to M. Freedman re: Next draft of testimony	7/17/25	0.25
William Monsen	A25-03-015	VPF	M. Freedman re: Draft testimony and approach on VPFs	7/21/25	0.50
William Monsen	A25-03-015	TESTGEN	Note to M. Freedman re: Status of review of draft testimony	7/21/25	0.25
William Monsen	A25-03-015	VPF	Draft testimony - VPF issues	7/21/25	1.50
William Monsen	A25-03-015	VPF	Review prior spending on various MWCs for VPFs	7/21/25	2.25
William Monsen	A25-03-015	VPF	Notes to M. Freedman re: Historic spending on MWCs being proposed by PG&E for VPFs	7/21/25	0.75
William Monsen	A25-03-015	VPF	Draft testimony - VPF issues	7/22/25	3.25
William Monsen	A25-03-015	VPF	Evaluate under- and over-spending by PG&E on certain MWCs	7/22/25	3.00
William Monsen	A25-03-015	TESTGEN	M. Freedman re: Next steps on testimony and analyses	7/22/25	0.50
William Monsen	A25-03-015	VPF	Notes to M. Freedman re: Analysis of under- and over-spending on Electric Distribution and Power Supply	7/23/25	0.75
William Monsen	A25-03-015	VPF	Draft testimony - VPF issues	7/23/25	2.50
William Monsen	A25-03-015	TRANSITION	Draft testimony - Transition costs	7/23/25	2.00
William Monsen	A25-03-015	RA	Draft testimony - RA issues	7/23/25	1.00
William Monsen	A25-03-015	VPF	Analysis of RSAs and PG&E data request responses re: Under- and over-spending	7/23/25	2.50
William Monsen	A25-03-015	TESTGEN	Notes to M. Freedman re: Draft testimony and next steps	7/23/25	0.75
William Monsen	A25-03-015	TESTGEN	M. Freedman re: Testimony	7/23/25	0.50
William Monsen	A25-03-015	TESTGEN	M. Freedman re: Finalizing testimony	7/24/25	0.25
William Monsen	A25-03-015	TESTGEN	Various notes to M. Freedman re: Finalization of testimony	7/24/25	0.75
William Monsen	A25-03-015	VPF	Finalize testimony and attachments - VPF issues	7/24/25	2.50
William Monsen	A25-03-015	FMF	Finalize testimony and attachments - FMF issues	7/24/25	2.50
William Monsen	A25-03-015	RA	Finalize testimony and attachments - RA issues	7/24/25	1.75
William Monsen	A25-03-015	VPF	Develop and finalize workpapers - VPF issues	7/25/25	2.25
William Monsen	A25-03-015	FMF	Develop and finalize workpapers - FMF issues	7/25/25	2.25
William Monsen	A25-03-015	RA	Develop and finalize workpapers - RA issues	7/25/25	0.50
William Monsen	A25-03-015	TESTGEN	Notes to M. Freedman re: Workpapers	7/25/25	0.50
William Monsen	A25-03-015	FMF	Note to M. Freedman re: Confidentiality of CPI data for PG&E	7/31/25	0.25
William Monsen	A25-03-015	CPUC	Coordination with M. Freedman re: Meet and Confer with PG&E	8/4/25	0.50
William Monsen	A25-03-015	TESTGEN	Notes to M. Freedman re: Following up on TURN opening testimony	8/8/25	0.75
William Monsen	A25-03-015	CPUC	Note to M. Freedman re: Meet and confer with PG&E	8/15/25	0.25
William Monsen	A25-03-015	GP	Review and analyze PG&E rebuttal testimony	8/18/25	3.75
William Monsen	A25-03-015	GP	Notes to M. Freedman re: PG&E rebuttal testimony	8/18/25	0.75
William Monsen	A25-03-015	EH	Develop data requests and topics for possible cross-examination	8/18/25	1.00
William Monsen	A25-03-015	COORD	Notes to M. Freedman re: Potential settlement discussions and upcoming meet and confer	8/20/25	0.50
William Monsen	A25-03-015	DISC	Notes to M. Freedman re: PG&E rebuttal and data request	8/20/25	0.50
William Monsen	A25-03-015	TESTGEN	Review calculations in TURN testimony and tables in PG&E rebuttal	8/20/25	2.00
William Monsen	A25-03-015	CPUC	Meet and Confer re: Next steps following submission of rebuttal testimony	8/21/25	0.75
William Monsen	A25-03-015	CPUC	M. Freedman re: Follow-up to meet and confer	8/21/25	0.25
William Monsen	A25-03-015	EH	Note to M. Freedman re: Timing of cross exhibits and report on meet and confer	8/21/25	0.25
William Monsen	A25-03-015	EH	Notes to PG&E re: Report on meet and confer and exhibit lists	8/26/25	0.75
William Monsen	A25-03-015	EH	Notes to M. Freedman and PG&E re: Reserved exhibit numbers for TURN exhibits based on pending data request responses from PG&E	8/26/25	0.75
William Monsen	A25-03-015	DISC	Note to M. Freedman re: PG&E data request responses	9/4/25	0.25
William Monsen	A25-03-015	EH	Note to M. Freedman re: Protocols for hearings	9/4/25	0.25
William Monsen	A25-03-015	EH	Note to M. Freedman re: Data requests to PG&E and hearing issues	9/5/25	0.25
William Monsen	A25-03-015	DISC	Review data requests to PG&E	9/5/25	0.25
William Monsen	A25-03-015	FMF	Review PG&E supplemental filing on FMF escalators (in review and analysis of workpapers)	9/8/25	0.75
William Monsen	A25-03-015	FMF	Note to M. Freedman re: Issues with PG&E's supplemental filing on escalators for FMFs	9/8/25	0.75
William Monsen	A25-03-015	FMF	Note to M. Freedman re: Exhibit regarding supplemental escalation filing	9/9/25	0.75
William Monsen	A25-03-015	FMF	Review escalation factors from prior GRC	9/9/25	0.75
William Monsen	A25-03-015	FMF	Note to M. Freedman re: Information request from Energy Division re: Fixed Management Fee escalation	9/10/25	0.50
William Monsen	A25-03-015	FMF	Note to M. Freedman re: Note to Energy Division re: PG&E escalation factor submission	9/15/25	0.25
William Monsen	A25-03-015	FMF	Note to M. Freedman re: ALU ruling on additional information about escalation of FMFs and next steps	9/25/25	0.50
William Monsen	A25-03-015	GP	Note to M. Freedman re: Cal Advocates' proposed motion to delay briefing schedule (inc. review of draft)	9/25/25	0.50
William Monsen	A25-03-015	BRIEFGEN	Note to M. Freedman re: Review of portion of draft brief	9/29/25	0.25
William Monsen	A25-03-015	BRIEFGEN	Review and edit draft brief	9/29/25	1.75
William Monsen	A25-03-015	BRIEFGEN	Note to M. Freedman re: Comments on portion of draft brief	9/30/25	0.25
William Monsen	A25-03-015	RA	Updated market price benchmarks	9/30/25	0.50
William Monsen	A25-03-015	BRIEFGEN	Review and edit brief	9/30/25	1.00
William Monsen	A25-03-015	RA	Note to M. Freedman re: New Market Price Benchmarks (inc. review of MPBs)	10/1/25	0.50
William Monsen	A25-03-015	FMF	Various notes to M. Freedman re: Supplemental testimony re: escalation of Fixed Management Fees	10/3/25	0.50
William Monsen	A25-03-015	BRIEFGEN	Review and summarize PG&E opening brief	10/5/25	2.25
William Monsen	A25-03-015	BRIEFGEN	Note to M. Freedman re: Review of PG&E opening brief	10/6/25	0.25
William Monsen	A25-03-015	FMF	Notes to M. Freedman re: Testimony and workpapers from PG&E	10/8/25	0.50
William Monsen	A25-03-015	FMF	Review PG&E testimony and workpapers re: FMFs	10/8/25	1.25
William Monsen	A25-03-015	FMF	Draft data requests re: FMF escalation	10/8/25	1.00
William Monsen	A25-03-015	FMF	M. Freedman re: FMF testimony and next steps	10/16/25	0.50
William Monsen	A25-03-015	FMF	Begin drafting outline for testimony	10/16/25	1.00
William Monsen	A25-03-015	DISC	Review data request responses	10/16/25	1.50
William Monsen	A25-03-015	RA	MEF re: Impacts of change in RA benchmark on PCIA and bundled service customers	10/17/25	0.25
William Monsen	A25-03-015	RA	Note to M. Freedman re: Motion for submission of testimony and PCIA issues	10/17/25	0.25
William Monsen	A25-03-015	FMF	Draft supplemental testimony	10/17/25	5.50
William Monsen	A25-03-015	FMF	Draft supplemental testimony	10/18/25	6.75
William Monsen	A25-03-015	FMF	Notes to M. Freedman re: Draft testimony and comments on Update testimony	10/19/25	0.50
William Monsen	A25-03-015	FMF	Review Update testimony	10/19/25	2.00
William Monsen	A25-03-015	FMF	Draft supplemental testimony	10/19/25	4.00
William Monsen	A25-03-015	FMF	Finalize testimony and attachments	10/20/25	5.25
William Monsen	A25-03-015	FMF	Review calculations in Update testimony	10/20/25	1.00
William Monsen	A25-03-015	FMF	Draft comments on Comments on Update Testimony	10/20/25	1.00
William Monsen	A25-03-015	BRIEFGEN	Notes to M. Freedman re: Comments on draft brief	10/21/25	0.50
William Monsen	A25-03-015	BRIEFGEN	Comments on draft brief	10/21/25	0.75
William Monsen	A25-03-015	BRIEFGEN	Note to M. Freedman re: Reply brief	10/22/25	0.25
William Monsen	A25-03-015	FMF	Note to M. Freedman re: PAO testimony	10/27/25	0.25
William Monsen	A25-03-015	FMF	Review PG&E testimony re: FMF escalation	10/28/25	0.75
William Monsen	A25-03-015	FMF	Note to M. Freedman re: Potential response to PG&E testimony re: FMF escalation	10/28/25	0.25

A.25-03-015 (Diablo Canyon) TURN Compensation Claim
Attorney Time Sheets

Staff	Case #	Code	Description	Date	Time
William Monsen	A25-03-015	CPUC	Notes to M. Freedman re: Oral arguments	10/30/25	0.50
William Monsen	A25-03-015	CPUC	Note to M. Freedman re: PD in proceeding and next steps	11/3/25	0.25
William Monsen	A25-03-015	CPUC	Review proposed decision	11/3/25	0.50
William Monsen	A25-03-015	GP	Notes to M. Freedman re: Motion to disqualify ALJ	11/4/25	0.25
William Monsen	A25-03-015	EXPARTE	Note to M. Freedman re: Ex parte meetings	11/7/25	0.25
William Monsen	A25-03-015	BRIEFGEN	Note to M. Freedman re: Draft comments on PD	11/17/25	0.25
William Monsen	A25-03-015	BRIEFGEN	Begin review of TURN draft comments on PD	11/17/25	0.50
William Monsen	A25-03-015	BRIEFGEN	Note to M. Freedman re: Draft comments on PD	11/17/25	0.25
William Monsen	A25-03-015	BRIEFGEN	Review draft comments on PD	11/18/25	1.25
William Monsen	A25-03-015	BRIEFGEN	Note to M. Freedman re: Status of review of comments on PD	11/18/25	0.25
William Monsen	A25-03-015	BRIEFGEN	Finalize review and comments on TURN opening comments on PD	11/19/25	0.75
William Monsen	A25-03-015	BRIEFGEN	Notes to M. Freedman re: Draft comments on PD	11/19/25	0.50
William Monsen	A25-03-015	BRIEFGEN	Note to M. Freedman re: Opening comments and next steps	11/20/25	0.25
William Monsen	A25-03-015	BRIEFGEN	Note to M. Freedman re: Revised reply comments on PD	11/23/25	0.25
William Monsen	A25-03-015	FMF	Draft reply comments	11/23/25	0.50
William Monsen	A25-03-015	CPUC	Note to M. Freedman re: Preparation for oral arguments	11/28/25	0.25
William Monsen	A25-03-015	CPUC	Review briefs, comments and ex parte notices in advance of oral argument	11/28/25	1.25
William Monsen	A25-03-015	CPUC	Develop talking points and details for oral arguments	11/30/25	4.00
William Monsen	A25-03-015	CPUC	Note to M. Freedman re: Presentation for oral arguments	11/30/25	0.25
William Monsen	A25-03-015	CPUC	M. Freedman re: Preparation for oral arguments	12/1/25	1.00
William Monsen	A25-03-015	CPUC	Prepare for oral arguments	12/1/25	1.50
William Monsen	A25-03-015	CPUC	Represent TURN at oral arguments	12/1/25	2.00
Substantial Total					330.25
Comp Total					9.50
Grand Total					339.75

Revised March 2023

Attachment 3

MRW consulting agreement and April 2025 invoice



Lower bills. Livable planet.

April 1, 2025

Mr. David Howarth
MRW & Associates, LLC
1736 Franklin Street, Suite 700
Oakland, CA 94612

Re: Consulting Agreement for work on PG&E 2026 DCPP Cost Recovery (A.25-03-015)

Dear Mr. Howarth:

This letter will confirm the terms of the consulting agreement between The Utility Reform Network ("TURN") and MRW & Associates, LLC.

All work will be performed by Bill Monsen with assistance from MRW staff as needed. Mr. Monsen will provide assistance in the development of case strategy and expert witness testimony regarding the issues to be mutually discussed and agreed upon with TURN. Mr. Monsen will be asked to sponsor testimony and appear as an expert witness on issues raised in PG&E's 2026 DCPP Cost Recovery Application (A.25-03-015). In addition, Mr. Monsen may be asked to help draft data requests, review the data requests and responses of other parties to the case, review other parties' testimony, assist with settlement strategy and negotiations, participate in hearing preparation, provide technical support with the drafting and review of filings made by TURN in this proceeding including opening and reply briefs and comments on rulings and proposed decisions in this proceeding. The scope of issues to be addressed by Mr. Monsen is subject to reconsideration and amendment based on further discussion between Mr. Monsen and TURN's representatives in this case.

Mr. Monsen proposes to charge an hourly rate of \$410 for work performed in 2025. Mr. Monsen's hourly rate for 2026 and subsequent years will be adjusted to reflect the CPUC's adopted market rate escalator. TURN and MRW will discuss and mutually agree on the treatment of any substantial expenses.

MRW will submit (on a monthly basis) detailed, daily timesheets for work on behalf of TURN and detailed accounting of any expenses. Upon receipt of a bill from MRW, TURN will pay one-half of the hourly billing and all billed expenses in accordance with

the billing terms. The remaining one-half of the hourly billing will be deferred pending the receipt of TURN's intervenor compensation from the California Public Utilities Commission. MRW and TURN understand that the Commission may not fully reimburse TURN for work performed by Mr. Monsen or may not approve Mr. Monsen's requested hourly rate. In that event, TURN will reimburse MRW for all of the deferred invoiced amounts except half of the amount disallowed by the Commission. When and if intervenor compensation is received, TURN will promptly remit payment to MRW.

Mr. Monsen will perform all work on this project and will function as an expert witness on the areas TURN and Mr. Monsen mutually discuss. TURN and MRW understand that work will begin in March 2025 and will end once the Commission adopts a final decision, or upon mutual agreement of both TURN and MRW.

We are very pleased to have you performing services for TURN in this case. Please signify your agreement to the terms outlined in this letter by signing below.

Very truly yours,

DocuSigned by:

Richard Perez

298D4FD8E92B4F5...

Richard Perez

Chief Financial Officer

Agreement to the terms described above:

DocuSigned by:

David J. Monson

3EC67BD920EE4E0...
MRW & Associates



MRW & Associates, LLC
1736 Franklin Street
Suite 700
Oakland, CA 94612
510-834-1999
www.mrwassoc.com

INVOICE

Invoice Date: 4/30/25
Total Amount: \$1,845.00
Number: 7523
Terms: Net 30
Project Code: 727.17
Project: 2026 Diablo Canyon (A.25-03-015)

TURN

Matthew Freedman
268 Bush Street, #3933
San Francisco, CA 94104

Invoice Summary

Description	Amount
Professional Fees	\$1,845.00
TOTAL AMOUNT DUE	\$1,845.00

Intervenor comp: 50% upfront, 50% intervenor

If you have any questions, please do not hesitate to contact David Howarth at
b kp@mrwassoc.com or 510-834-1999.

Federal ID# 26-4500748



MRW & Associates, LLC
1736 Franklin Street
Suite 700
Oakland, CA 94612
510-834-1999
www.mrwassoc.com

INVOICE

Invoice Date: 4/30/25
Total Amount: \$1,845.00
Number: 7523
Terms: Net 30
Project Code: 727.17
Project: 2026 Diablo Canyon (A.25-03-015)

TURN

Matthew Freedman
268 Bush Street, #3933
San Francisco, CA 94104

Invoice Details

Source	Date	Code	Description	Hrs / Qnt	Rate	Amount
Professional Fees						
William Monsen	4/15/25	E-mail - Review/respond	Note to M. Freedman re: Review of testimony to identify issues for protest	0.25	\$410.00	\$102.50
William Monsen	4/21/25	E-mail - Review/respond	Note to M. Freedman re: Confidential documents and workpapers for proceeding	0.25	\$410.00	\$102.50
William Monsen	4/24/25	E-mail - Review/respond	Notes to M. Freedman re: NDA (including signing NDA) and issues for protest	1.00	\$410.00	\$410.00
William Monsen	4/24/25	Technical Analysis	Review initial PG&E testimony	3.00	\$410.00	\$1,230.00
				William Monsen	4.50	\$1,845.00
				Professional Fees	4.50	\$1,845.00
TOTAL FEES/EXPENSES					--	\$1,845.00

Attachment 4

TURN Hours Allocated by Issue

	GP	CPUC	DISC	COORD	EH	EXPARTE	BRIEFGEN	FMF	RA	VPF	TESTGEN	TRANSITION	Substantive Hours	Substantive \$\$\$	Comp	Compensation (IComp)	Travel	Compensation (Travel)
	Billing Period	Hourly Rate														1/2 of hourly rate		1/2 of hourly rate
Matthew Freedman	1-2025	\$795	23.25	9.25	13.50	1.25	6.00	5.25	4.00	24.25	11.75	34.50	4.00	11.00	148.00	\$ 117,660.00	1.00	\$ 397.50
Matthew Freedman	2-2025	\$820															8.50	\$ 465.00
William Monsen	2025	\$410	14.50	13.50	11.00	1.25	3.25	0.25	11.50	60.75	12.75	30.75	17.00	5.75	182.25	\$ 74,722.50	-	\$ -
TOTAL			37.75	22.75	24.50	2.50	9.25	5.50	15.50	85.00	24.50	65.25	21.00	16.75	330.25	\$ 192,382.50	9.50	\$ 3,882.50
TOTAL % HOURS ALLOCATED			11.43%	6.89%	7.42%	0.76%	2.80%	1.67%	4.69%	25.74%	7.42%	19.76%	6.36%	5.07%	100.00%			

Substantial Contribution	\$ 192,382.50
Intervenor Comp Compensation	\$ 3,882.50
Travel Time Compensation	\$ -
Expenses Compensation	\$ -
Grand Total	\$ 196,265.00