



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

**FILED**

02/06/26

03:27 PM

A2405004

Application of Pacific Gas and Electric  
Company (U 39 G) for Approval of Natural  
Gas Curtailment Procedures Pursuant to  
Decision 23-11-069.

Application 24-05-004  
(Filed May 14, 2024)

**SUPPLEMENT TO INTERVENOR COMPENSATION CLAIM  
OF THE UTILITY REFORM NETWORK**

Hayley Goodson  
Managing Attorney

February 6, 2026

**The Utility Reform Network**  
360 Grand Avenue, #150  
Oakland, CA 94610  
Telephone: (415) 929-8876  
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E-mail: [hayley@turn.org](mailto:hayley@turn.org)

**SUPPLEMENT TO INTERVENOR COMPENSATION CLAIM  
OF THE UTILITY REFORM NETWORK**

On December 18, 2025, The Utility Reform Network (TURN) filed an Intervenor Compensation Claim in this proceeding. On January 22, 2026, the Commission directed TURN to file a Supplement to the Intervenor Compensation Claim, providing “a copy of the contract(s) for Michel P. Florio that verifies the rate charged by this consultant to TURN for 2024 and 2025.” TURN included invoices documenting the hourly rates charged by Mr. Florio to TURN in 2024 and 2025 as Attachment 4 to TURN’s Intervenor Compensation Claim. Pursuant to the Commission’s directive, TURN hereby submits the requested additional documentation of Mr. Florio’s 2024 and 2025 billing rates.

Date: February 6, 2026

Respectfully submitted,

By: \_\_\_\_\_/s/ \_\_\_\_\_  
Hayley Goodson  
Managing Attorney

**The Utility Reform Network**  
360 Grand Avenue, #150  
Oakland, CA 94610  
Telephone: (415) 929-8876  
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**ATTACHMENT 1**

**Agreement for Legal and Consulting Services Between  
TURN and Michel Peter Florio**



785 Market Street, Suite 1400  
San Francisco, CA 94103

415.553.8876 • [www.turn.org](http://www.turn.org)

Mark Toney, Ph.D., Executive Director

March 11, 2021

Michel Peter Florio  
7823 Crest Avenue  
Oakland, CA 94605

**Re: Agreement for Legal and Consulting Services**

Dear Mr. Florio:

This letter is to confirm the terms of the agreement for legal and consulting services between The Utility Reform Network (“TURN”) and Michel Peter Florio (“Consultant”), for work that Consultant performs at TURN’s request in CPUC proceedings or other related matters.

**Scope and Nature of Work**

Working in conjunction with and under the direction of TURN’s attorneys, Consultant will provide legal and consulting services on issues related to TURN’s participation in designated CPUC proceedings or related matters, with the exact scope of services to be determined by mutual agreement between TURN and Consultant on a case-by-case basis. The services to be provided by Consultant include identification and analysis of issues, preparation of pleadings, preparation of data requests and analysis of data request responses, working with other TURN consultants, preparation and sponsorship of expert witness testimony, and cross examination of other parties’ witnesses, the exact nature of services to be determined by mutual agreement between TURN and Consultant on a case-by-case basis.

**Compensation and Billing**

Consultant agrees to provide these services at an **hourly rate of \$695 in 2021 for work by Mr. Michel Peter Florio**, with the rate to be updated periodically through an addendum to this agreement. In addition, Consultant will bill at cost for reasonable costs of travel outside of the Bay Area.

Upon receipt of a monthly invoice from Consultant, TURN will pay \$300 per hour for services performed in that month, within 30 days. The remaining portion of the invoiced amount will be

Michel Peter Florio

March 11, 2021

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deferred pending the receipt of TURN's intervenor compensation from the Commission. When and if intervenor compensation is received, TURN will promptly remit payment to Consultant.

Consultant and TURN understand that the Commission may not fully reimburse TURN for work performed by Consultant or may not approve the requested hourly rate. In that event, TURN will reimburse Consultant for all of the deferred invoiced amounts **except for** the deferred portion of the amount disallowed by the Commission. The parties will confer in good faith to determine the correct deferred payment amount in the event of any ambiguity.

In addition, Consultant may from time to time perform work for TURN that is not expected to be eligible for recovery under the intervenor compensation program. Consultant shall be paid \$350 per hour for such work, on a monthly basis with no deferral.

#### Time Sheets

Consultant will submit, along with any invoice, detailed daily timesheets for work on behalf of TURN and a detailed accounting of any expenses in a format suitable for our compensation requests. Timesheets shall include the sufficient detail to identify the nature of the work and the nature of the issues addressed.

We are pleased to have you consulting for TURN on an ongoing basis. The signatures on this letter signify agreement to the terms set forth in this letter. The effective date of this agreement is January 1, 2021.

Very truly yours,

\_\_\_\_\_  
/s/\_\_\_\_\_

Thomas J. Long  
Legal Director

Agreement to the terms described above:

  
\_\_\_\_\_  
Michel Peter Florio, Consultant

**ATTACHMENT 2**

**Addendum to Agreement for Legal and Consulting Services Between  
TURN and Michel Peter Florio re: 2024 Billing Rate**

**Subject:** Memorialization of Addendum to Retainer Agreement - 2024 Billing Rate

**From:** Hayley Goodson <hayley@turn.org>

**Date:** 2/6/26, 11:40 AM

**To:** Mike Florio <mikeflorio@rocketmail.com>

**CC:** Richard Alan Perez <rap@turn.org>

Mike,

I'm writing to memorialize the ***oral addendum*** to our March 11, 2021, Agreement for Legal and Consulting Services, adjusting your billing rate for work performed at TURN's request in CPUC proceedings in 2024.

This written expression of our oral addendum is necessary to address the CPUC's January 22, 2026, request for "a copy of the contract(s) for Michel P. Florio that verifies the rate charged by this consultant to TURN for 2024 and 2025" for the purpose of determining the hourly rate to include in TURN's award of Intervenor Compensation. TURN already submitted copies of your invoices to TURN for work in 2024 and 2025 to verify your billing rates for those years and did not anticipate the CPUC's new request for a second source of written verification.

As you know, in early 2024 the U.S. Bureau of Labor Statistics published its update to Table 5 - Employment Cost Index (ECI) providing the percent change for the 12-months ended Dec. 2023 for the Occupational Group "Management, Professional, and Related, excluding Incentive Paid Occupations". This is the index that the Commission relies on pursuant to Resolution ALJ-393 to escalate Intervenor Compensation Hourly Rates. The percent change shown in Table 5 for this time period was 4.1%. Shortly after this update to ECI Table 5, you and I agreed that your 2023 hourly billing rate of \$750 would increase by this same escalation rate of 4.1% for work performed at TURN's request in CPUC proceedings in 2024, producing a 2024 hourly billing rate of \$780.

Thank you again for your work on behalf of TURN in 2024.

Hayley

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Hayley Goodson  
The Utility Reform Network (TURN)  
360 Grand Avenue, #150  
Oakland, CA 94610  
(415) 929-8876 ext. 320  
[hayley@turn.org](mailto:hayley@turn.org)

Pronouns: she, her, hers

**ATTACHMENT 3**

**Addendum to Agreement for Legal and Consulting Services Between  
TURN and Michel Peter Florio re: 2025 Billing Rate**

**Subject:** Memorialization of Addendum to Retainer Agreement - 2025 Billing Rate

**From:** Hayley Goodson <hayley@turn.org>

**Date:** 2/6/26, 11:40 AM

**To:** Mike Florio <mikeflorio@rocketmail.com>

**CC:** Richard Alan Perez <rap@turn.org>

Mike,

I'm writing to memorialize the ***oral addendum*** to our March 11, 2021, Agreement for Legal and Consulting Services, adjusting your billing rate for work performed at TURN's request in CPUC proceedings in 2025.

This written expression of our oral addendum is necessary to address the CPUC's January 22, 2026, request for "a copy of the contract(s) for Michel P. Florio that verifies the rate charged by this consultant to TURN for 2024 and 2025" for the purpose of determining the hourly rate to include in TURN's award of Intervenor Compensation. TURN already submitted copies of your invoices to TURN for work in 2024 and 2025 to verify your billing rates for those years and did not anticipate the CPUC's new request for a second source of written verification.

As you know, in early 2025 the U.S. Bureau of Labor Statistics published its update to Table 5 - Employment Cost Index (ECI) providing the percent change for the 12-months ended Dec. 2024 for the Occupational Group "Management, Professional, and Related, excluding Incentive Paid Occupations". This is the index that the Commission relies on pursuant to Resolution ALJ-393 to escalate Intervenor Compensation Hourly Rates. The percent change shown in Table 5 for this time period was 3.5%. Shortly after this update to ECI Table 5, you and I agreed that your 2024 hourly billing rate of \$780 would increase by this same escalation rate of 3.5% for work performed at TURN's request in CPUC proceedings in 2025, producing a 2025 hourly billing rate of \$805.

Thank you again for your work on behalf of TURN in 2025.

Hayley

--

Hayley Goodson

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