



Decision _____

FILED

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

02/20/26

03:56 PM

Rulemaking 18-07-006
SR1807006
(Filed July 12, 2018)

Order Instituting Rulemaking to Establish a Framework and Processes for Assessing the Affordability of Utility Service.

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.

Intervenor: CENTER FOR ACCESSIBLE TECHNOLOGY (CforAT)	For contribution to Decision D.25-12-044	
Claimed: \$ 78,285.75	Awarded: \$	
Assigned Commissioner: Darcie L. Houck	Assigned ALJ: Camille Watts-Zagha	
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).		
Signature:		/s/ Melissa W. Kasnitz
Date: February 20, 2026	Printed Name:	Melissa W. Kasnitz

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

A. Brief description of Decision:	D.25-12-044 (the Final Decision) made several adjustments to the Commission’s affordability framework to improve consideration of affordability for essential utility services. First, the Final Decision modified the requirement for the investor-owned energy utilities and Class A water utilities to provide updated affordability metrics in all applications
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	<p>where the revenue increase is estimated to exceed more than one percent of the currently authorized revenues, by narrowing this requirement to only General Rate Case applications. Second, the Final Decision transitioned the updates made to the affordability framework via the issuance of the annual Affordability Report to information postings on the Commission’s website, under the affordability page, that includes periodic staff updates to the affordability metrics, tools, and analyses on affordability issues, such as the Affordability Report provided in response to Executive Order N-5-24. Third, the Final Decision affirmed the requirement for the investor-owned energy utilities and Class A water utilities to continue to publicly release the Cost and Rate Trackers and eliminates the option to alternatively submit summaries. It also granted SDG&E and SCE motions for confidential treatment of certain data. Fourth, the Final Decision requires the Communications Division to prepare a staff report on affordability considerations unique to the communications industry, including the essential service level for broadband. Lastly, the Final Decision summarized the prior public hearings and party comments as well as progress to-date in in implementation of affordability proposals, recommended next steps for consideration by the Commission to further address affordability issues facing California ratepayers, and closed the proceeding.</p>
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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:	10/15/2018	
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	11/9/2018	
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:	See comment below	
6. Date of ALJ ruling:	See comment below	

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

	Intervenor	CPUC Verification
7. Based on another CPUC determination (specify):	D.20-06-046, see comment below.	
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:	See comment below	
10. Date of ALJ ruling:	See comment below	
11. Based on another CPUC determination (specify):	D.20-06-046, see comment below.	
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.25-12-044	
14. Date of issuance of Final Order or Decision:	12/22/2025	
15. File date of compensation request:	2/20/2026	
16. Was the request for compensation timely?		

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

#	Intervenor’s Comment(s)	CPUC Discussion
5-11	<p>D.21-09-034 awarded compensation to CforAT for work contributing to D.20-07-032, the Phase 1 Decision in this docket. D.21-09-034 included verification of CforAT’s eligible customer status and showing of significant financial hardship. <i>Id.</i> at p. 2.</p> <p>D.24-04-034 awarded compensation to CforAT for work contributing to D.22-08-023, the Phase 2 Decision in this docket. D.24-04-034 included verification of CforAT’s eligible customer status and showing of significant financial hardship. <i>Id.</i> at p. 2.</p>	

#	Intervenor's Comment(s)	CPUC Discussion
	“A party found eligible for an award of compensation in one phase of a proceeding remains eligible in later phases, including any rehearing, in the same proceeding.” Rule 17.2, Commission Rules of Practice and Procedure.	

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

Revised March 2023

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
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<p>Overview: Phase 3 of this proceeding focused on a multi-year assessment of the affordability framework adopted in earlier phases and the use of the adopted affordability metrics for consideration in various proceedings. CforAT has long been active on the issue of affordability of essential supplies of utility service, and this has continued through Phase 3 of this proceeding. Specifically, CforAT participated actively in activities related to the Essential Usage Study (which informed the Commission’s affordability deliberations) and in Commission En Banc meetings concerning affordability and also submitted the following written comments (naming conventions based on Final Decision):</p> <ul style="list-style-type: none">• Comments on 2022 ACR Inviting Comments on Strategies (Comments on 2022 ACR Strategies), filed August 1, 2022;• Comments on 2022 ACR Seeking Annual Feedback (Comments on 2022 ACR), filed November 30, 2022;• Reply Comments on 2023 ACR Seeking Annual Feedback on the Implementation of the Affordability Framework (Reply Comments on 2023		
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<p>ACR), filed February 16, 2024;² and</p> <ul style="list-style-type: none"> • Comments on Proposed Decision (Comments on PD), filed December 3, 2025. 		
<p>Essential Usage Study: CforAT engaged in work regarding the Essential Usage Study, including participating in workshops and meetings and reviewing drafts and updates. Some of the hours we are claiming are for our work on the Essential Use Study in the A.19-11-009 proceeding which is now closed. CforAT has not previously requested time for those hours.</p> <p>In D.23-09-017 (the compensation decision based on CforAT’s contributions to D.21-11-016 in A.19-11-019), CforAT noted additional time on the Essential Usage Study not included in our request and reserved the right to seek compensation at an appropriate time. D.23-09-017, issued September 25, 2023, in A.19-11-019, at p. 7.</p>	<p>This proceeding included discussion of the Essential Use Study created in the 2019 Phase Two PG&E GRC Proceeding (A.19-11-009). <i>See</i> D.22-08-023 at pp. 11-12 (noting that the Phase 2 scoped issue regarding the Essential Usage Study is still in process).</p>	

² The Final Decision cites CforAT’s opening comments on page 9, but CforAT did not file opening comments. CforAT filed reply comments on February 16, 2024, which not cited in the Final Decision on page 10 in the list of parties that filed replies.

<p>En Bancs: CforAT attended and participated in Affordability En Banc meetings held by the Commission on February 28-March 1, 2022 and February 7, 2023. Stakeholder input at these En Banc meetings contributed to the Commission's record on affordability, informing the Commission's deliberations.</p>	<p>The Final Decision acknowledges the input gained through parties' participation in the Affordability en bancs that the Commission has considered in this and other proceedings and which will continue to inform the Commission's consideration of affordability. Final Decision at pp. 72-73 and fn.126.</p>	
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<p>Comments on 2022 ACR Inviting Comments on Strategies (Comments on 2022 ACR Strategies)</p> <p>When an initial Assigned Commissioner’s Ruling requested party comment on issues identified as under review in Phase 3 of this proceeding, CforAT appropriately responded, providing input on the questions issued. <i>See</i> Comments on 2022 ACR Strategies at pp. 1-8, cited in Final Decision at p. 6.</p> <p>As directed by the ACR, CforAT provided recommendations regarding ways for the Commission to maximize public outreach and engagement and vet affordability issues impacting California ratepayers. Comments on 2022 ACR Strategies at pp. 2-8. These comments also recommended that “[t]he Commission should make wide use of its adopted affordability metrics” to obtain insight into challenges faced by households related to essential utility service. Comments on 2022 ACR Strategies at pp. 7-8.</p>	<p>The Final Decision includes the Comments on 2022 ACR Strategies, in the list of filings that “constitute the record that is the basis for this decision,” and does include this set of Comments within the scope of work for Phase 3 and directly cites this set of comments by CforAT and other parties in its discussion and decision-making. Final Decision at pp. 6, 11, 26, 71.</p> <p>CforAT’s Comments on 2022 ACR Strategies appropriately responded to the Commission’s solicitation of comments within this Phase and provided input to inform the Commission’s deliberation on affordability issues. While the Final Decision narrows the criteria for including affordability metrics in individual proceedings, the Final Decision affirms that affordability is an important issue to be considered across proceedings and industries and that analysis of affordability “will benefit from the utilization of the metrics developed in this proceeding,” consistent with CforAT’s recommendation advocating for the Commission to make wide use of its affordability metrics. Final Decision at p. 74.</p> <p>In addition, the Final Decision concludes that it is reasonable for Commission staff to continue producing affordability metrics, interactive maps displaying affordability metrics by industry, and forecasts of revenue and rate changes and post them on the Commission website where they are available to the public. Final Decision at p. 81.</p>	
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<p>CforAT noted that true affordability action must focus on lowering revenue requirements, rather than rate design and allocation issues which can only shift revenue collected among various customer classes. Comments on 2022 ACR Strategies at p. 8, cited in Final Decision at p. 26 footnote 38.</p> <p>CforAT recommended that the Commission make wide use of its adopted affordability metrics and noted that they provide a valuable method for understanding households' struggles to obtain essential services. Comments on 2022 ACR Strategies pp. 7-8.</p> <p>CforAT made recommendations regarding steps the Commission should take to vet affordability issues,</p>	<p>Consistent with CforAT's comments regarding addressing affordability through cost reduction strategies, the Final Decision requires greater context and consideration of revenue requirements and capital costs by requiring utilities to include comparisons of revenue and rate trends to inflation and to separate operational and capital expense components. Final Decision at pp. 27-32.</p> <p>These requirements provide more transparency and visibility into the affordability impacts of the utilities' revenue requirements, consistent with CforAT comments regarding the need to address revenue requirements.</p> <p>While the Final Decision narrows the number of proceedings in which metrics are required, it nevertheless confirms the usefulness of the metrics and requires energy and Class A water utilities to highlight metrics for vulnerable customer groups, consistent with CforAT's support for use of the metrics and consideration of households' ability to obtain essential utility service. Final Decision at pp. 38-42. It also noted that parties can request consideration of the affordability metrics in additional proceedings and encouraged parties to do so. Final Decision at pp. 77-78.</p> <p>Consistent with CforAT's recommendation that the Commission consider activities including coordination with other policymakers, cost reduction, and holistic consideration of budgetary pressures on households, the Final Decision states</p>	
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<p>including focusing on activities within its jurisdiction for action, considering factors that exacerbate energy affordability issues, making wide use of its metrics, making efforts to lower revenue requirements, being mindful of unintended impacts, and considering the development of affordability principles. CforAT noted that the Commission’s efforts should “certainly includ[e] options for making recommendations to the state legislature and other policymakers, and support for efforts to obtain external (non-ratepayer) funding for areas of broad public concern.” Comments on 2022 ACR Strategies at pp. 7-8, cited in Final Decision p.71 footnote 123.</p>	<p>that “It is critical that the Commission continue to consider a full range of options as to how to reduce electricity bills for customers through review of utility provider applications, rulemaking proceedings and through coordination and education of ratemaking mechanisms and principles with the legislature.” Final Decision at p. 71. Consistent with CforAT’s recommendation to consider affordability metrics widely, the Commission articulates that the metrics and information from this proceeding will inform its consideration of affordability in other proceedings. Final Decision at pp. 72-73.</p>	
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<p>Comments on 2022 ACR Seeking Annual Feedback (Comments on 2022 ACR) CforAT noted that some feedback could not be fully developed based on the limited experience of stakeholders in working with the affordability metrics and framework. Comments on 2022 ACR at pp. 1-5.</p> <p>CforAT recommended that the itemized lists of revenue requests include easy-to-understand, narrative summaries and recommended specific information that should be included. Comments on 2022 ACR at pp. 11-12.</p> <p>CforAT noted confusion from the time lag and “largely . . . retrospective review” provided by the Affordability Report and recommended that future reports clearly indicate the time periods covered and the basis for information provided. Comments on 2022 ACR at p. 10. These overall comments were referenced in the Final Decision at p. 8 (“Many parties indicated that the framework had not been implemented for long, limiting the value of the initial round of feedback. However, some parties did recommend methodological improvements to the affordability tools”).</p> <p>CforAT stated that AACs are a highly useful metric for focusing on areas of the state with the most serious</p>	<p>Consistent with CforAT’s recommendations for summaries and a better understanding of the time periods addressed in the Affordability Report, the Final Decision states that “[i]n response [to party feedback], Commission staff implemented several improvements, including adding summary overviews to Quarterly Revenue Reports, and improving the timeliness of the affordability metrics by producing two years’ worth of affordability reports in one report.” Final Decision at p. 8.</p> <p>Consistent with CforAT’s comments regarding the confusion over time periods covered in the Affordability Report, the Final Decision determines that the information can be better presented online, allowing for better clarity and for making updates and adjustments on an ongoing basis. Final Decision at pp. 44-45.</p> <p>Consistent with CforAT’s support for AACs, the Final Decision determines that “AACs should remain part of the analytic toolbox available to stakeholders.” Final Decision at p. 82.</p>	
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<p>affordability challenges and that it would be helpful to have this geographic targeting available as a tool. Comments on 2022 ACR at p. 4.</p> <p>CforAT stated that the Commission had not yet collected enough information to determine the affordability framework’s impact on closing the digital divide and supported the effective consideration of affordability in communications proceedings. Comments on 2022 ACR at pp. 7-8.</p> <p>CforAT identified providers’ repetitive arguments and unproductive opposition to consideration of affordability, and CforAT emphasized and supported the Commission’s authority to consider the affordability of communications services. Comments on 2022 ACR at pp. 7-8.</p> <p>CforAT raised concerns about the affordability of communications services, particularly for utility customers with disabilities, and supported the use of affordability metrics in communications proceedings. CforAT emphasized the importance of affordable and reliable communications services, particularly for our constituency and noting that dependence has increased since</p>	<p>Consistent with CforAT’s support for the consideration of affordability for communications services, the Final Decision directs Communications Division staff to gather and analyze information on affordability considerations for communications and to prepare a staff report on communications affordability, including the essential service level for broadband. Final Decision at pp. 66-67.</p> <p>Consistent with CforAT's refutation of providers’ arguments, the Final Decision rejects providers arguments regarding competition and jurisdiction and articulates the Commission’s authority to track affordability and require pricing obligations as a condition for accepting state funds. Final Decision at pp. 65-67.</p> <p>Consistent with CforAT’s arguments concerning the need for affordable and reliable communications services, the initial version of the proposed decision modified the essential service level for broadband by raising it to 100 Megabits per second (Mbps) download speed, and 20 Mbps upload speed. Proposed Decision, issued November 13, 2025, at p. 60.</p> <p>Consistent with CforAT’s arguments regarding customers’ increased dependence on communications services since the pandemic, the initial proposed decision determined that consumer broadband needs have evolved beyond</p>	
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<p>the pandemic. Comments on 2022 ACR at pp. 8-9.</p>	<p>the 25/3 Mbps standard. Proposed Decision at p. 60.</p> <p>The Commission has long held that contribution to a Proposed Decision is evidence of a substantial contribution to the proceeding overall, even if the Commission does not adopt the PD’s recommendations.</p> <p>Examples of prior proceedings where the Commission has determined that a party’s contribution to a proposed decision that was not eventually adopted was still sufficient to support an award of compensation include D.11-05-044, where the Commission awarded TURN substantially all of its requested compensation in a proceeding where it adopted an Alternate PD, which did not adopt TURN’s recommendations, over a PD which would have done so. In awarding compensation, the Commission specifically noted that “TURN’s participation ensured a thorough analysis on [the relevant issues], and their position was reflected in the PD, though not in the alternate PD, which was the final decision that was adopted. D.11-05-044 at p. 4. The Commission reached a similar outcome in D.13-09-041, awarding compensation to TURN based on its contributions to a proposed decision, even though it approved an alternate proposed decision which did not adopt TURN’s positions. See also D.06-09-008 at p. 10 (agreeing that TURN made a substantial contribution to a proceeding “because the decision addressed issues raised by TURN and an Alternate Decision relied on several of TURN’s proposals”).</p> <p>The fact that the Commission initially issued a proposed decision that would have taken a position strongly in</p>	
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<p>CforAT identified that implementation of affordability metrics in various proceedings has helped to make questions of affordability a fundamental part of the record and supported this greater visibility of affordability considerations. Comments on 2022 ACR at pp. 2-3.</p> <p>CforAT noted the substantial affordability impacts of advice letter filings and requested that the Commission require the use of affordability metrics in any advice letter filing that crosses the 1% revenue requirement threshold. Comments on 2022 ACR at pp. 3-4.</p>	<p>keeping with the position advocated by CforAT indicates that CforAT's advocacy contributed to the Commission's consideration of these issues.</p> <p>While the Commission narrows the number of individual proceedings requiring metrics, it requires additional context alongside the affordability metrics in order to produce more robust information. Final Decision at pp. 79, 81. This is consistent with CforAT's support for improving visibility of affordability issues. In addition, the Final Decision confirms that assigned Commissioners and Administrative Law Judges retain the discretion to require affordability metrics in individual proceedings and "encourage[s] parties to request inclusion of affordability metrics as appropriate via existing mechanisms." Final Decision at pp. 30, 77-78.</p> <p>While the Final Decision "narrows the requirement to include affordability metrics in all applications meeting certain criteria to only GRC applications meeting certain criteria," it justifies this more limited submission of affordability metrics with the additional new requirements for greater context, responding to arguments that affordability metrics should be submitted more widely. Final Decision at p. 41. As one of the parties advocating for wider use of affordability metrics, CforAT's input nevertheless informed the Commission's deliberation on this issue.</p> <p>Consistent with CforAT's support for expanded use of the metrics and consideration of affordability, the Final Decision requires additional contextual</p>	
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<p>CforAT supported the ongoing use of affordability metrics and advocated for expanded use of affordability metrics into any activity that results in substantial bill increases for customers. In addition, CforAT noted the importance of Commission action in response to affordability metrics in order to alleviate burdens for customers. Comments on 2022 ACR at pp. 5-6.</p> <p>CforAT identified that the Affordability Report focuses on the most vulnerable geographic communities and discussed that not all highly burdened customers are clustered geographically in identifiable communities, including CforAT’s constituents. CforAT recommended that the Affordability Report better reflect that affordability challenges are not limited to the most burdened geographic areas. Comments on 2022 ACR at pp. 10-11.</p>	<p>data to inform a more robust understanding of affordability. Final Decision at p. 41. Consistent with CforAT’s call for Commission action to improve affordability, the Final Decision acknowledges that “[i]t is critical that the Commission continue to consider a full range of options as to how to reduce electricity bills for customers.” Final Decision at p. 72.</p> <p>While the Final Decision does not adopt this recommendation, it implicitly acknowledges the limitations of AACs and geographically-identified communities by stating that “AACs are <i>one</i> of several methods of identifying where to find and how to address the needs of the most vulnerable communities and ESJ communities” and that they are “<i>part</i> of the analytic toolbox.” Final Decision at p. 61 (emphasis added). By consistently raising considerations of vulnerable communities not identified geographically or included in the ESJ definition, CforAT brought these issues to the Commission’s attention, which the Commission noted and cited to a subsequent filing. Final Decision at pp. 61-62 footnote 102.</p>	
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<p>Reply Comments on 2023 ACR Seeking Annual Feedback (Reply Comments on 2023 ACR) CforAT refuted communications providers’ previously-rejected arguments that affordability metrics are not applicable to them and constitute rate regulation and recommended that the Commission reject them. CforAT explained that that gathering and presenting affordability data on broadband services is helpful to advancing the Commission’s analysis and within the Commission’s authority. Reply Comments on 2023 ACR at pp. 1-6, cited in Final Decision at p. 64 footnote 109.</p> <p>CforAT opposed the California Water Association’s arguments opposing the Commission’s review of affordability metrics in water ratemaking proceedings and supported the usefulness of affordability metrics for water. Reply Comments on 2023 ACR at p. 8.</p> <p>CforAT supported EDF’s recommendation that the Commission revise the Affordability Framework to consider the long-term impacts of decarbonization on affordability and give appropriate consideration to the affordability of natural gas going forward into California’s clean energy future. Reply</p>	<p>Consistent with CforAT’s refutation of providers’ arguments, the Final Decision states that tracking affordability does not constitute rate regulation. Final Decision at p. 66. Consistent with CforAT’s support for the use of affordability metrics and the Commission’s efforts to advance its understanding of broadband affordability, the Final Decision orders that Commission staff shall gather and analyze communication services affordability data and present recommendations in a report regarding how prices and plans including for broadband service affect Californians in different parts of the state. Final Decision at p. 82.</p> <p>Consistent with CforAT’s support for the use of affordability metrics, the Final Decision requires that Class A water utilities include additional contextual data as recommended by staff to highlight impacts on disadvantaged customers, along with the filing of affordability metrics when required in individual proceedings. Final Decision at pp. 38-40.</p> <p>While the Final Decision did not directly adopt these recommendations, it summarized parties’ concerns regarding the energy transition and affordability, evincing consideration of this concern held by CforAT and other parties. Final Decision at p. 26.</p> <p>Consistent with the need to consider disadvantaged customers who may be among the remaining natural gas customers, the Final Decision requires energy utilities to highlight impacts on</p>	
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<p>Comments on 2023 ACR at pp. 7-8.</p> <p>CforAT opposed the Sempra Utilities' efforts to constrain the proceedings in which affordability metrics are considered and to raise the revenue threshold for inclusion of the metrics. Reply Comments on 2023 ACR at p. 7.</p>	<p>the most disadvantaged customers when filing the required affordability metrics. Final Decision at pp. 38-39.</p> <p>Consistent with CforAT's recommendations, the Final Decision did not adopt a heightened 3-4% revenue threshold as advocated by the Sempra Utilities. Final Decision at p. 41 footnote 65. While the Final Decision narrowed the proceedings requiring affordability metrics, it retained flexibility for consideration of metrics when directed by the assigned Commissioner or Administrative Law Judge, consistent with CforAT's position for wide usage of metrics. Final Decision at p. 30.</p>	
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<p>Comments on PD CforAT supported the Commission’s determination that “AACs will remain part of the analytic toolbox available to stakeholders and may help identify whether ESJ communities are being disproportionately impacted.” Comments on PD at pp. 3-4, citing PD. CforAT recommended that the Commission modify the PD to address impacts on vulnerable communities that are not specifically included in the definition of ESJ communities. Comments on PD at p. 4, cited in Final Decision at pp. 61-61 fn 102.</p> <p>CforAT supported the PD’s clarification that an Assigned Commissioner or Assigned Administrative Law Judge retain the authority to require affordability metrics in individual proceedings. Comments on PD at pp. 1-2. CforAT supported the PD’s requirement to separate rate impact drivers into operational and capital categories. Comments on PD at p. 2. CforAT supported the PD’s requirement that energy and Class A water utilities highlight affordability impacts on vulnerable customer groups. Comments on PD at p. 3. CforAT supported the PD’s careful review of SDG&E and SCE’s motion seeking confidential treatment and explanation of the Commission’s confidentiality</p>	<p>Consistent with CforAT’s support for the PD using AACs, the Final Decision retains consideration of this method. Final Decision at p. 61.</p> <p>Acknowledging CforAT’s input that ESJ communities do not include all vulnerable communities, the Final Decision directly cites CforAT’s Comments on PD in footnote 102, stating “As emphasized by CforAT in comments on the proposed decision, individuals with disabilities, including those with Access and Functional Needs and other medical vulnerabilities, are not included in the formal definition of ESJ communities in version 2.0 of the ESJ Action Plan.” Final Decision at pp. 61-62.</p> <p>Consistent with CforAT’s support for these aspects of the PD, the Final Decision retains: (1) clarification that Commissioners or Administrative Law Judges have discretion to require affordability metrics in individual proceedings; (2) separation of rate impact drivers into operational and capital categories; (3) requirement for energy and Class A water utilities to highlight metrics for vulnerable customer groups; (4) careful consideration of motions for confidential treatment and explanation of the Commission’s analysis. Final Decision at pp. 30, 37, 38, 50-58. While the Final Decision modifies the PD to grant SCE’s motion for confidential treatment based on additional information provided, the Final Decision retains careful analysis and explanation. Final Decision at p. 77.</p>	
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<p>analysis, noting that utilities often fail to provide fact-specific, well-reasoned explanations to support motions for confidentiality. Comments on PD at p. 3.</p> <p>CforAT supported the PD’s rejection of providers’ arguments that competition is sufficient to ensure affordability and recommended that the Commission include an acknowledgment that current levels of competition across California are insufficient to ensure the affordability of broadband for every household. Comments on PD at p. 5.</p> <p>CforAT supported the PD’s increase of the essential service level of broadband from 25/3 to 100/20. Comments on PD at pp. 5-6.</p> <p>CforAT emphasized the ongoing need to address affordability in future proceedings, by supporting the flexibility for Commissioners or Administrative Law Judges to require consideration of affordability metrics in individual proceedings and supporting the Commission’s ability to collect and analyze information on affordability</p>	<p>Consistent with CforAT’s support for this discussion, the Final Decision retained its discussion that many Californians lack access to multiple providers and that additional information on communications affordability should be gathered and analyzed in a staff report. Final Decision at pp. 65-67.</p> <p>While the Final Decision did not retain this requirement and determined that it would benefit from additional consideration, CforAT’s support for this requirement nonetheless informed the Commission’s deliberation on this issue, including the determination that this issue should be addressed within the anticipated staff report on communications affordability. Final Decision at pp. 75-76.</p> <p>The Final Decision acknowledges these points by CforAT and in response, “encourage[s] parties to request inclusion of affordability metrics as appropriate via existing mechanisms.” Final Decision at pp. 77-78.</p>	
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<p>impacts. Comments on PD at pp. 1-6, cited in Final Decision at p. 77 (“CforAT . . . highlight[s] the need to address affordability concretely in future proceedings”). p. 77.</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?³</p>	Yes	
<p>b. Were there other parties to the proceeding with positions similar to yours?</p>	Yes	
<p>c. If so, provide name of other parties:</p> <p>At times, CforAT’s positions on certain issues overlapped with those of various other parties, including CalCCA, Joint Ratepayers, UCAN, TURN, and EDF.</p>		
<p>d. Intervenor’s claim of non-duplication:</p> <p>CforAT’s specific focus on our constituency of utility customers with disabilities and medical needs elicited unique contributions. While CforAT’s positions at times overlapped with those of other parties, CforAT was the sole party focused on the representation of this vulnerable population. To the extent that parties shared positions, this was based on the importance of the issues raised by the proceeding’s focus on affordability and should not be the basis of a reduction in compensation.</p>		

C. Additional Comments on Part II: (use line reference # or letter as appropriate)

#	Intervenor’s Comment	CPUC Discussion

³ 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.

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>a. Intervenor’s claim of cost reasonableness:</p> <p>CforAT’s overall cost of participation is reasonable. Affordability of essential supplies of utility services is a key concern for our constituency of customers with disabilities and medical needs, and CforAT has been active in supporting Commission efforts in all industries to ensure such affordability. In this proceeding, CforAT provided input regarding the Commission’s use of affordability metrics and an affordability framework in order to support the consideration of overall utility affordability across industries. Utility customers with disabilities and medical needs are disproportionately low-income and also highly dependent on reliable and affordable utility service to support their ability to live independently in their community.</p> <p>While it is difficult to assign a monetary value to CforAT’s contributions in Phase 3 of this proceeding, CforAT’s efforts to support the consideration of utility affordability will support the ability of our constituency to access essential supplies of utility services at rates they can afford, and thus to maintain their independence. This value exceeds CforAT’s reasonable costs of participation.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>In this phase of the proceeding, the Commission addressed the assessment of the affordability framework and evaluated affordability across industries. CforAT’s Legal Director, Melissa Kasnitz, took the overall lead in the proceeding, while delegating work addressing communications issues to CforAT’s Legal Counsel, Paul Goodman. Mr. Goodman generally serves as CforAT’s lead on communications matters before the Commission, so this shared authority was appropriate and efficient. Ms. Kasnitz and Mr. Goodman are both experienced practitioners before the Commission and were able to minimize overlap in their responsibilities. Some amount of coordination and conferencing on the issues pending in this phase of the proceeding is appropriate and necessary, and CforAT’s claim should not be reduced based on the modest amount of time spent on such coordination.</p> <p>Additionally, Rachel Sweetnam, CforAT Staff Attorney, assisted in the preparation of this request for compensation. Ms. Sweetnam’s rate is</p>	

	CPUC Discussion
<p>substantially lower than the rate of either Ms. Kasnitz or Mr. Goodman, and this delegation was efficient.</p>	
<p>c. Allocation of hours by issue:</p> <p style="text-align: center;">Kasnitz Hours - 2020 (0.7 hours)</p> <p>Study (0.7 hours, 100 percent) The issue area “Study” includes time spent on issues involving the Essential Use Study, and includes unclaimed time spent on the Essential Use Study in A.19-11-009.</p> <p style="text-align: center;">Kasnitz Hours - 2021 (21.4 hours)</p> <p>Study (10.8 hours, 50.5 percent)</p> <p>Phase 3: (10.6 hours, 49.5 percent) The issue area “Phase 3” includes time spent on issues involving public outreach and engagement and affordability issues impacting California ratepayers.</p> <p style="text-align: center;">Kasnitz Hours - 2022 (45.6 hours)</p> <p>Procedural (0.9 hours, 2.0 percent) The issue area “Procedural” includes time spent on procedural matters such as scheduling and time spent on issues not covered by another issue area.</p> <p>Study (3.6 hours, 7.7 percent)</p> <p>Phase 3 (24.7 hours, 54.2 percent)</p> <p>ACR (16.5 hours, 36.2 percent) The issue area “ACR” includes time spent on issues involving the 2022 Affordability Report.</p> <p style="text-align: center;">Kasnitz Hours - 2023 (10.8 hours)</p> <p>Procedural (0.2 hours, 3.5 percent)</p> <p>Phase 3 (5.5 hours, 96.5 percent):</p> <p style="text-align: center;">Kasnitz Hours - 2024 (5.7 hours)</p> <p>Procedural (0.2 hours, 3.5 percent)</p>	

	CPUC Discussion
<p>Phase 3 (9.4 hours, 87.0 percent)</p> <p style="text-align: center;">Kasnitz Hours - 2025 (2.6 hours)</p> <p>PD (2.6 hours, 100%): The issue area “PD” includes time spent on reviewing and commenting on the Proposed Decision.</p> <p style="text-align: center;">Goodman Hours - 2022 (17.4 hours)</p> <p>Procedural (0.3 hours, 1.7 percent)</p> <p>Phase 3 (4 hours, 23.0 percent)</p> <p>ACR (13.1 hours, 75.3 percent)</p> <p style="text-align: center;">Goodman Hours – 2023 (0.3 hours)</p> <p>Phase 3 (0.3 hours, 100 percent)</p> <p style="text-align: center;">Goodman Hours - 2024 (3 hours)</p> <p>Phase 3 (3 hours, 100 percent)</p> <p style="text-align: center;">Goodman Hours - 2025 (6.8 hours)</p> <p>PD (6.8 hours, 100 percent)</p>	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Melissa W. Kasnitz	2020	0.7	\$ 495	D.22-07-023	\$ 346.50			
Melissa W. Kasnitz	2021	21.4	\$ 670	D.22-07-018	\$ 14,338.00			

CLAIMED						CPUC AWARD		
Melissa W. Kasnitz	2022	45.6	\$ 690	D.23-03-030	\$ 31,464.00			
Melissa W. Kasnitz	2023	10.8	\$ 715	D.24-06-018	\$ 7,722.00			
Melissa W. Kasnitz	2024	5.7	\$ 735	D.24-10-028	\$ 4,189.50			
Melissa W. Kasnitz	2025	2.6	\$ 755	D.25-10-060	\$ 1,963.00			
Paul Goodman	2022	17.4	\$ 550	D.23-03-030	\$ 9,570.00			
Paul Goodman	2023	0.3	\$ 575	D.24-03-025	\$ 172.50			
Paul Goodman	2024	3	\$ 625	D.25-04-018	\$ 1,875.00			
Paul Goodman	2025	6.8	\$680	See comments below	\$ 4,624.00			
Subtotal: \$ 76,264.50						Subtotal: \$		
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 \$
[Person 1]								
[Person 2]								
Subtotal: \$						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Rachel Sweetnam	2026	14.7	\$ 137.50	½ approved 2025 rate (D.25-10-050) See comments below	\$ 2,021.25			
Subtotal: \$ 2,021.25						Subtotal: \$		

CLAIMED				CPUC AWARD
COSTS				
#	Item	Detail	Amount	Amount
1.				
2.				
			<i>Subtotal: \$</i>	<i>Subtotal: \$</i>
			TOTAL REQUEST: \$ 78,285.75	TOTAL AWARD: \$

*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. Intervenors' 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 ⁴	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

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
A	Rate for Paul Goodman in 2025: 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

⁴ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

Attachment or Comment #	Description/Comment
	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.
B	Rates for Time Spent on Compensation Request: While this compensation request was drafted in 2026, all the recorded work on the merits took place in 2025 or earlier. For this reason, CforAT is requesting time spent on compensation at ½ the standard rates for 2025. We will request updated rates for 2026 rates in a later compensation request.

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 <i>(see Rule 14.6(c)(6))</i>?	
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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.25-12-044 .
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 75th 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

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D.25-12-044		
Proceeding(s):	R.18-07-006		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
CENTER FOR ACCESSIBLE TECHNOLOGY	FEBRUARY 20, 2026	\$ 78,285.75		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Melissa	Kasnitz	Attorney	\$ 495	2020	
Melissa	Kasnitz	Attorney	\$ 670	2021	
Melissa	Kasnitz	Attorney	\$ 690	2022	
Melissa	Kasnitz	Attorney	\$ 715	2023	
Melissa	Kasnitz	Attorney	\$ 735	2024	
Melissa	Kasnitz	Attorney	\$ 755	2025	
Paul	Goodman	Attorney	\$ 550	2022	
Paul	Goodman	Attorney	\$575	2023	
Paul	Goodman	Attorney	\$ 625	2024	
Paul	Goodman	Attorney	\$ 680	2025	
Rachel	Sweetnam	Attorney	\$ 275	2025	

Revised March 2023

(END OF APPENDIX)