



Decision _____

FILED

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

02/20/26

03:59 PM

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

R.18-07-006 R1807006
(File: July 12, 2018)

INTERVENOR COMPENSATION CLAIM OF UTILITY CONSUMERS' ACTION NETWORK AND DECISION ON INTERVENOR COMPENSATION CLAIM OF UTILITY CONSUMERS' ACTION 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: Utility Consumers' Action Network	For contribution to Decision (D.) D. 25-12-044, D.22-08-023
Claimed: \$110,532.50	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:	<i>/s/ Jason Zeller</i>
Date: 2/20/2026	Printed Name: Jason Zeller

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

A. Brief description of Decision:	<p>D.22- 08-023 directs when and how the affordability framework will be applied in Commission energy, water and communications proceedings and further develops the tools and methodologies used to calculate the three previously adopted affordability metrics (see D.20-07-032).</p> <p>D.25-12-044 makes several adjustments to the Commission's affordability framework to enhance its consideration of affordability issues for essential utility services and closes 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:	October 12, 2018	
2. Other specified date for NOI:		
3. Date NOI filed:	November 8, 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:	R.18-07-006	
6. Date of ALJ ruling:	May 30, 2019 ²	
7. Based on another CPUC determination (specify):	See also: D.21-08-015 ³	
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:	R.18-07-006	
10. Date of ALJ ruling:	May 30, 2019 ⁴	
11. Based on another CPUC determination (specify):	See also: D.21-08-015 ⁵	
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?		

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

² Ruling: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M296/K319/296319049.PDF>

³ D.21-08-015, p. 2, <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M398/K319/398319718.PDF>

⁴ Ruling: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M296/K319/296319049.PDF>

⁵ D.21-08-015, p. 2, <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M398/K319/398319718.PDF>

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

#	Intervenor’s Comment(s)	CPUC Discussion
	UCAN is requesting compensation for hours and work contributing to the two decisions listed above. UCAN previously filed an intervenor compensation claim for D.20-07-032 and has received compensation. The work and hours listed in this claim do not include hours already compensated in the previous claim.	

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

A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059): (For each contribution, support with specific reference to the record.)

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
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<p><u>D.22-08-023: Issues</u></p> <p>1. Affordability Ratio (AR) Calculator</p> <p>Parties examined the inputs and metrics in the AR Calculator offering additions or adaptations. UCAN argued that including certain data regarding disconnections in the AR Calculator would provide “an accurate metric to determine how a proposed increase in rates [would] affect the state’s most economically vulnerable communities.”</p> <p>The decision cited to UCAN’s argument and concerns.</p> <p>The Commission noted that some disconnection data are reported by IOUs in Rulemaking 18-07-005.</p> <p>While not including UCAN’s recommendation to include additional disconnection data in this decision, the decision acknowledged that refinements to the affordability framework are ongoing and will continue over time. UCAN contributed valuable information and insight for the record and believes that during the ongoing assessment period it could be determined that disconnection data is helpful to decision makers.</p>	<p>Opening Comments of UCAN on Staff Proposal on Implementation of Affordability Metrics (UCAN Comments on Staff Proposal), at 1-4.</p> <p>D.22-08-023 at 20.</p> <p>D.22-08-023 at 20, fn. 51.</p> <p><i>“Conforming to the standardized format of the affordability framework requires ongoing, methodical consideration of technical tools developed in this phase, Phase 2, of the proceeding...adhering to a standardized presentation of affordability impacts is still novel and will require review and refinement over time.”</i></p> <p>D.22-08-023 at 16.</p>	
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<p>2. Input: Income and Housing Costs From U.S. Census Bureau</p> <p>UCAN recommended that sewer and wastewater charges should be included in the utility costs used to determine the calculation of resource level for the Affordability Ratio. UCAN argued, “The Commission should recognize that utility services or utility-like services encompass expenses beyond those traditional regulated by the Commission.”</p> <p>The decision cited to UCAN’s argument and concerns.</p> <p>The Commission disagreed with UCAN’s recommendation.</p> <p>The Commission went on to clarify that taxes (argued by TURN) were likely more significant, acknowledging that taxes are not currently included in the calculation of the AR, they could be in Phase 3 of this proceeding.</p> <p>While not adopting UCAN’s recommendation, UCAN did help the Commission clarify and distinguish its position on current variables in the AR calculation and their significance. Additionally, as noted above, review and refinement of the affordability framework is ongoing over time. UCAN’s contribution to</p>	<p>UCAN Comments on Staff Proposal at 4-5.</p> <p>D.22-08-023 at 26, and see fn. 71, citing to UCAN Opening Comments at 6.</p> <p><i>“There is no indication that sewer and wastewater charges are a significant factor worth including.”</i> D.22-08-023 at 26.</p> <p>D.22-08-023 at 26.</p>	
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<p>the record of this proceeding could be re-visited and re-evaluated during this ongoing review.</p>		
<p>3. Water Tracker</p> <p>UCAN agreed with concerns expressed by the IOUs at the November/December 2021 working sessions regarding the “burden associated with modifying inputs into the rate tracker tool for every advice letter, water revenue adjustment mechanism, or other non-general rate case proceeding that may affect customer rates.”</p> <p>The decision cited to the agreement parties discussed at the working sessions.</p> <p>While UCAN recommended updating the rate tracker twice a year, the Commission agreed that rather than submission in quarterly proceedings as recommended in the Implementation Staff Proposal, water utilities should update and submit their Water Tracker quarterly.</p> <p>UCAN’s participation in the working sessions and highlighting that additional tracking requirements could result in higher rates helped the Commission make its final determination regarding updates to the water tracker.</p>	<p>UCAN Comments on Staff Proposal at 8.</p> <p>D.22-08-023 at 39, and see fn. 104, citing to UCAN Opening Comments at 8.</p> <p>D.22-08-023 at 40.</p>	

<p>4. Affordability Metrics in Water Applications</p> <p>In determining affordability metrics in water utility filings, UCAN recommended that the smaller Class A water companies should be required to “examine the cost of water offered by the nearest public or municipal provider.”</p> <p>The final decision noted UCAN’s recommendation.</p> <p>While noting UCAN’s recommendation, the Commission clarified that comparisons to municipal water providers would be unworkable due to the burden of having to manually input the data causing an increase in the likelihood of error. The decision found it unnecessary for Class A water utilities to make comparisons and display trends in water affordability in individual proceedings.</p> <p>UCAN opposed this finding and recommended modifying Findings of Fact 5 and 6, Conclusions of Law and Ordering Paragraphs 1 and 2 to help better track the 86% of water customers served by public agencies. While not adopting UCAN’s recommendations in the final decision, UCAN believes it contributed to the record by helping the Commission clarify its final position on requirements for water utilities in their applications.</p>	<p>UCAN Comments on Staff Proposal at 7.</p> <p>D.22-08-023 at 62, and see fn. 172, citing to UCAN Opening Comments at 7.</p> <p>D.22-08-023 at 62-63.</p> <p>See UCAN Comments on Proposed Decision at 3-5.</p>	
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<p>5. Informing Communications Resources</p> <p>UCAN recommended that it was highly appropriate and necessary to monitor implementation of the California Advanced Services Fund to ensure that “high speed digital access to the internet becomes as ubiquitous as dial tone was at the beginning of the 21st Century.”</p> <p>The decision noted UCAN’s position.</p> <p>The Commission agreed with UCAN and other parties and required that the affordability metrics be considered in both the CASF and Broadband for All proceedings.</p>	<p>UCAN Comments on Staff Proposal at 9-10.</p> <p>D.22-08-023 at 67.</p> <p>D.22-08-023 at 68.</p>	
<p><u>End of</u> <u>D.22-08-023 Contributions</u></p>		

<u>D.25-12-044:</u>		
<p>These are the UCAN documents referenced in UCAN’s contributions described in the following rows regarding D.25-12-044 issues.</p> <p><u>UCAN 01:</u> Comments on Ruling Questions, dated November 30, 2022</p> <p><u>UCAN 02:</u> Comments on Affordability Framework, dated January 25, 2024</p> <p><u>UCAN 03:</u> Reply Comments on Affordability Framework, dated February 16, 2024</p> <p><u>UCAN 04:</u> Comments on PD, dated December 3, 2025</p> <p><u>UCAN 05:</u> Reply Comments on PD, dated December 8, 2025</p>		
Issue: Affordability Framework Usefulness		
<p>UCAN noted that SDG&E/SoCalGas’s claims regarding the record were inaccurate and cited to numerous UCAN contributions to the record. For example, UCAN asked that the Commission use graphical comparisons to provide the proper context to improve the usefulness of affordability metrics. UCAN 05, pp. 2-3</p>	<p>The Commission agreed with UCAN. “SDG&E/SoCalGas oppose the characterization to provide “additional context” in the form of graphical displays of revenue and rate trends, broken down by capital expenses and all other expenses, as required below, claiming these requirements are outside of scope and without record. The SDG&E/SoCalGas claims are faulty as a review of the record shows. We are persuaded by parties arguing that more contextual data alongside the metrics will improve the usefulness of the metrics.” D.25-12-044, p. 30</p>	

<p>UCAN recommended an affordability threshold (i.e., a high energy burden as previously defined by the Commission, or as a fixed dollar amount), UCAN 02, pp. 8-15, UCAN 03, pp. 2-3,</p> <p>...extensively discussed economic inflation and rate inflation, ... UCAN 01, p. 5-7, UCAN 02, pp. 2-3, UCAN 02, p. 6, UCAN 02, p. 17, UCAN 03, pp. 2-3, UCAN 04, p. 5, UCAN 04, p. 8-11, UCAN 05, p. 2-3, ...and recommended that the Commission require the IOUs to compare rates to inflation. UCAN 01, p. 5, UCAN 04, p. 8-11, UCAN 05, pp. 2-3.</p>	<p>The Commission adopted UCAN’s recommendation to give a proper context to rate increases by comparing them to overall inflation.</p> <p>“While we have yet to determine an absolute threshold, parties recommend a common and understandable inflation trend to compare to revenue and rate trends.” D.25-12-044, p. 30</p>	
<p>UCAN requested that the Commission require utilities to provide affordability metrics across a wide range of proceedings but highlighted some proceedings where metrics are not needed. UCAN 01, pp. 7-8.</p>	<p>The Commission’s nuanced approach generally aligns with UCAN’s recommendation.</p> <p>“This does not mean that the utilities are relieved from providing such information in other proceedings not required by this decision. ...we require all investor-owned energy utilities to supply more context alongside the metrics. We determine that tracking revenue requirement and rate changes against inflation is appropriate context to require with affordability metrics, when affordability metrics are required in GRC Phase 1 applications, or when an assigned Commissioner or ALJ</p>	

	<p>requires the utility to submit metrics in a specific proceeding.” D.25-12-044, pp. 30-31</p>	
<p>UCAN supported the affordability framework’s metrics that support disadvantaged customer groups:</p> <p>“The affordability framework can be used to concentrate the Commission’s efforts to achieve is social justice goals since it contains specific geographic data on neighborhoods in peril of a high rate of service terminations...” UCAN 02, p. 7.</p> <p>UCAN proposed that the AR20 metrics be compared to both minimum wage hours and Areas of Affordability Concern (see tables). UCAN 02, pp. 14-15.</p>	<p>The Commission’s decision aligned with UCAN’s recommendations by requiring disadvantage customer metrics.</p> <p>“The investor-owned energy utilities are required to also highlight the metrics of disadvantaged customer groups as recommended in the 2021/2022 annual Affordability Report.” D.25-12-044, p. 31</p>	
<p>UCAN requested that the Commission require context for the affordability metrics because the affordability metrics are not readily understandable.</p> <p>“UCAN has concerns that the annual affordability report (“AAR”) will be challenging for decision makers to understand much less make effective use of. For that reason, the metrics from the AAR and the data behind the AAR need to be summarized in a clear and straight forward</p>	<p>The Commission agreed with UCAN.</p> <p>“This decision requires a comparison of basic trends of revenue and rate changes to inflation whenever the utilities are required to submit affordability metrics in order to compare the rate and bill implications of utility requests to a common, understandable benchmark. An understandable benchmark is needed to help parties and decisionmakers have more context around relative changes in affordability, as suggested by parties.” D.25-12-044, p. 31</p>	

<p>manner in any utility proposal that would increase customers' costs.” UCAN 02, p. 8.</p> <p>“The challenge is for CBOs, utility service representatives, and Commission decisionmakers is to understand the meaning of the AR figures and how to best incorporate the information into the decision-making process.” UCAN 02, p. 18.</p> <p>“While the affordability framework provides a wealth of detail about utility rates, it is not readily accessible to the lay public.” UCAN 03, p. 3.</p> <p>“Presenting graphical information comparing utility rates to the CPI will assist the public in understanding the outcomes of the Commission’s various and complex processes of setting revenue requirements.” UCAN 05, p. 3.</p>		
<p>UCAN recommended that the Commission expand affordability metrics beyond residential customers. UCAN 01, p. 3. UCAN 04, p. 6-7.</p>	<p>The Commission agreed with UCAN.</p> <p>“We recognize that affordability concerns cut across each of these customer classes and that the Commission should consider how best to address such concerns in the future.” D.25-12-044, p. 43</p>	
<p>UCAN highlighted the need for context and plain language so</p>	<p>The Commission agreed with UCAN.</p>	

<p>that decisionmakers and ratepayers can better understand the affordability metrics. UCAN 02, p. 8. UCAN 02, p. 18. UCAN 03, p. 3.</p>	<p>“Some parties request that the annual Affordability Reports include different types of analysis, discuss affordability impacts in plain language, and explain how the Commission employs the affordability metrics in its considerations. [citing UCAN among others]... We agree with parties that the annual Affordability Report is useful but that the presentation of information can be improved. ... we recognize the need for simplicity and clarity called for by many parties...” D.25-12-044, pp. 44-45</p> <p>“We require more context to be included with the filing of updated affordability metrics in individual proceedings, to generate more robust analysis of the affordability metrics.” D.25-12-044, pp. 73-74</p>	
<p>Issue: Usefulness of the Cost and Rate Trackers</p>		
<p>UCAN supported continued use of rate trackers. UCAN 02, p. 18, UCAN 03, p. 10-11.</p>	<p>The Commission agreed with UCAN. “Trackers provide valuable and timely information into the cumulative effects of all Commission approvals... The Trackers will continue to be served quarterly to the docket of this proceeding,... To the degree that cumulative revenue, rate and bill impacts are within the scope of any individual proceedings, the Trackers provide relevant data that may be introduced as determined by the assigned Commissioner or ALJ.” D.25-12-044, p. 50</p>	
<p>UCAN recommended that the Commission require utilities to include affordability metrics in several proceeding types. UCAN 01, pp. 7-8.</p>	<p>The Commission agreed with UCAN. “Affordability issues merit inclusion across a wide range of proceedings, including GRCs, and analysis of those</p>	

	<p>issues will benefit from utilization of the metrics developed in this proceeding.” D.25-12-044, p. 74</p>	
<p>Regarding usefulness of cost and rate trackers, UCAN recommended that the Commission expand affordability metrics beyond residential customers. UCAN 01, p. 3. UCAN 04, p. 6-7.</p>	<p>The Commission agreed with UCAN. “Moreover, while the metrics developed in this proceeding will help advance consideration of affordability in an objective and data-driven manner, we also recognize that additional work may be appropriate to understand the specific affordability challenges affecting different customers, such as nonresidential customers, which should be considered in the context of future proceedings, including GRCs.” D.25-12-044, p. 74</p>	
<p>UCAN stated that it “strongly supports these updates to affordability tracking which include (1) increasing access to the affordability metrics by making all metrics and data available through the Commission’s website...” UCAN 04, p. 1. “...UCAN supports the increased availability of data and metrics on the Commission’s website...” UCAN 04, p. 11.</p>	<p>The Commission will make the affordability metrics available on the CPUC website. “For efficiency, flexibility and transparency, we transition the production of the affordability metrics, maps, and analysis from a static annual report to the Commission’s affordability webpages.” D.25-12-044, p. 74</p>	
<p>UCAN supported continued use of rate trackers. UCAN 02, p. 18, UCAN 03, p. 10-11.</p>	<p>The Commission agreed with UCAN. “ We affirm the prior order in this proceeding to require public release of the Trackers for electric, gas and Class A water utilities and eliminate the option to provide a summarized report.” D.25-12-044, p. 74</p>	
<p>UCAN opposed use of system average rates:</p>	<p>The Commission agreed with UCAN. “ We find SCE’s recommendation to change the rate trend data from</p>	

<p>“What does not follow is SCE’s proposed remedy for capital expenditures to use system average rates to track how utility rates are changing over time. No class of utility customers pays system average rates... Since this rulemaking is dedicated to examining how affordability issues are affecting residential customers, using a system average rate methodology for comparing customer rates to the CPI would be inaccurate and would fail to track actual customer bills.” UCAN 05, pp. 3-4.</p>	<p>Residential Average Rates to System Average Rates inappropriate because the affordability framework has been developed for residential affordability.” D.25-12-044, p. 76</p>	
<p>UCAN expressed support for continued development of affordability metrics beyond residential customers so that future affordability metrics are available for small business/commercial customers class and other customer classes. UCAN 01, p. 3 UCAN 04, pp. 6-7.</p>	<p>The Commission’s decision acknowledged the importance of non-residential affordability metrics in alignment with UCAN’s position.</p> <p>“[W]e agree that affordability for non-residential customer classes is important and deserves attention. We further explain that while the metrics developed do not translate to non-residential classes for the reasons described in Section 3.3.4, the concepts of the affordability framework may provide guidance when addressing small commercial and other non-residential customer classes in other proceedings. Additionally, in recognition of the affordability challenges faced by small commercial ratepayers, the Trackers now produce sample bills for small commercial customers on a quarterly basis, which is a result of Commission staff having worked cooperatively with IOUs to develop the function of converting revenue changes into bills for small commercial customers.” D.25-12-044, p. 77</p>	

<p>UCAN supported Commission orders instead of broad delegation:</p> <p>“UCAN is also concerned about this apparent delegation of authority and believes that a better approach would be to continue this affordability rulemaking in another format... Simply delegating affordability issues to the Energy Division is inappropriate and an improper delegation of Commission authority to one of its operational divisions. Affordability concerns about customer rates are long standing and will continue to be so. However, the proper approach is to continue the affordability review process in a follow-on proceeding.” UCAN 05, p. 2.</p>	<p>The Commission agreed with UCAN.</p> <p>“Additional revisions are made to 1) remove the delegation of authority to Energy Division to revise the newly required graphical information, as it is too broad and not aligned with prior delegations, especially given that this proceeding is closing.” D.25-12-044, p. 77</p>	
<p>Issue: Impacts on Environmental and Social Justice (ESJ) Communities</p>		
<p>UCAN supported the use of Areas of Affordability Concern (“AAC”) data. The decision addressed AACs as the main topic of the ESJ issue.</p> <p>“[In response to ruling questions on AAC:] Yes. Affordability is statutorily and necessarily a key component of the Commission’s overall responsibility as a rate-setting agency.” UCAN 02, p. 19.</p>	<p>The Commission agreed with UCAN.</p> <p>“AACs are one of several methods of identifying where to find and how to address the needs of the most vulnerable communities and ESJ communities... Use of AACs will remain part of the analytic toolbox available to stakeholders and may help identify whether ESJ communities are being disproportionately impacted.” D.25-12-044, p. 61</p>	

<p>“Yes, the AAC areas should be of great concern to the Commission, and so should every other PUMA where AR20 customers are living under the stress of a high energy burden.” UCAN 03, pp. 9-10.</p> <p>“UCAN strongly supports these updates to affordability tracking which include... (4) continued use of areas of affordability concern (“AAC”) metrics.” UCAN 04, p. 1.</p>		
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor’s Assertion	CPUC Discussion
a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding? ⁶	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties: CforAT and TURN		
d. Intervenor’s claim of non-duplication: <u>D.22-08-023</u> : UCAN uniquely noted the importance of both municipal water, sewer, and wastewater charges on household budgets in assessing the affordability of utility services in California. UCAN also noted that although the Commission does not regulate municipal water rates, 86% of California residential customers receive their water from municipal providers. While not adopting UCAN’s position, the decision noted UCAN’s unique contribution. UCAN also uniquely discussed disconnection data, also noted and discussed, but not adopted in the final decision. These are examples of UCAN providing distinctive contributions in this proceeding and contributing to the		

⁶ 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.

<p>Commissions discussions and final decisions on multiple topics. While some contributions were similar to other parties (i.e. include affordability metrics in communication proceedings), UCAN was able to provide the Commission with helpful analyses and recommendations to clarify and determine its final positions.</p> <p><u>D.25-12-044</u>: UCAN is the only consumer advocate representing the interests of San Diego Gas and Electric residential ratepayers that provided comments to the Commission on the issues in this Affordability proceeding (the other intervenors are in the Bay Area). In this decision, UCAN made several unique contributions. For example, UCAN detailed the need for graphic representations of inflation versus rate increases. UCAN provided the Commission with several examples of graphic (i.e., charts and graphs) contextual examples to highlight the importance and impact of contextual illustrations. UCAN also corrected the utilities’ mistaken assertion that graphic representation of inflation versus rates was missing from the record of the proceeding.</p> <p>UCAN coordinates with other intervenors when reasonable and to support efficiency, often during workshops or by reading other parties’ comments. This awareness of other parties’ positions enables UCAN and other parties to minimize duplicative work and analyses. UCAN urges the Commission to find that its participation avoided undue duplication and to ensure that, to the extent duplication occurred, it served to supplement, complement, or contribute to the showing of the other intervenors.</p>	
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C. Additional Comments on Part II: (use line reference # or letter as appropriate)

#	Intervenor’s Comment	CPUC Discussion

PART III: REASONABLENESS OF REQUESTED COMPENSATION
(to be completed by Intervenor except where indicated)

A. General Claim of Reasonableness (§ 1801 and § 1806):

	CPUC Discussion
<p>a. Intervenor’s claim of cost reasonableness: UCAN has been an active party in all phases of this rulemaking since its inception in 2018. UCAN has participated in workshops, submitted comments on proposed decisions and responses to a series of questions posed by the presiding administrative law judge.</p>	

	CPUC Discussion
<p>UCAN used a single attorney and a single expert in this proceeding. In doing so, UCAN was able to utilize team member coordination (see timesheet) thereby maximizing its ability to efficiently address the issues within the proceeding. Consequently, UCAN efficiently argued the merits of affordability and the need for clear and contextualized affordability metrics.</p> <p>While unable to provide an exact savings figure to ratepayers for its participation, UCAN believes its contribution, as described in Part II (A) above, directly benefited ratepayers by providing thoughtful and meaningful refinements to affordability metrics that will illuminate when costs are exceeding what ratepayers can afford. UCAN’s contribution will help tackle the ongoing affordability crisis by providing the Commission with further refined tools to determine when rate increases exceed affordability ranges for ratepayers. UCAN’s participation enhanced the record for future reference in the ongoing reviews of the affordability metrics, thereby giving a continuing voice to ratepayers on the issues of affordability.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>UCAN strategically researched and commented on issues on which the Commission requested feedback. UCAN further restricted itself to sub-issues that are within its expertise and mostly to issues that affect residential customers. UCAN spent a conservative number of hours on the issues in the proceeding by utilizing one attorney and one expert to examine the issues. UCAN further divided work on filings into sections so as each person could work and write about the issues under their strengths and complement each other’s contributions (see discussions in timesheet entries among attorney and expert, especially for D.25-12-044.)</p> <p><u>Additional timesheet explanations:</u></p> <p>For D.22-08-023, UCAN identified five issues for substantial contribution (see Part II (A) above). UCAN also utilized the additional categories of Identifying Issues (II) and Preparing and Presenting (PP) to capture tasks such as reading Rulings and identifying issues as well as spending time preparing a motion and beginning comments on the Staff Proposal or Proposed Decision.</p> <p>For D.25-12-044, UCAN listed three issue areas which were identified by the decision (see Part II (A) above).</p>	

			CPUC Discussion																																							
<p>UCAN is also noticing that due to recent requests for more detailed time entries and breaking out tasks along with identifying more specific issues, the intervenor compensations claims and timesheets are taking more hours to prepare. UCAN is not opposed to these requests and is doing its best to follow and fulfill any requirements, and urges the Commission to find the additional time needed to produce intervenor compensation requests reasonable and not excessive.</p>																																										
<p>c. D.25-12-044 - Allocation of hours by issue:</p> <table border="1"> <thead> <tr> <th>Issue</th> <th>Hours</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td colspan="3">D.22-08-023</td> </tr> <tr> <td>Affordability Metrics in Water Applications</td> <td>6.25</td> <td>9%</td> </tr> <tr> <td>Affordability Ratio (AR) Calculator</td> <td>14.25</td> <td>21%</td> </tr> <tr> <td>Identifying Issues</td> <td>18.50</td> <td>28%</td> </tr> <tr> <td>Informing Communications Resources</td> <td>5.50</td> <td>8%</td> </tr> <tr> <td>Input: Income & Housing Costs</td> <td>5.50</td> <td>8%</td> </tr> <tr> <td>Preparing and Presenting</td> <td>8</td> <td>12%</td> </tr> <tr> <td>Water Tracker</td> <td>9</td> <td>13%</td> </tr> <tr> <td colspan="3">D.25-12-044</td> </tr> <tr> <td>Affordability Framework Usefulness</td> <td>72.15</td> <td>63%</td> </tr> <tr> <td>Usefulness of the Cost and Rate Trackers</td> <td>27.00</td> <td>23%</td> </tr> <tr> <td>Impacts on ESJ Communities</td> <td>15.80</td> <td>14%</td> </tr> </tbody> </table>			Issue	Hours	Percentage	D.22-08-023			Affordability Metrics in Water Applications	6.25	9%	Affordability Ratio (AR) Calculator	14.25	21%	Identifying Issues	18.50	28%	Informing Communications Resources	5.50	8%	Input: Income & Housing Costs	5.50	8%	Preparing and Presenting	8	12%	Water Tracker	9	13%	D.25-12-044			Affordability Framework Usefulness	72.15	63%	Usefulness of the Cost and Rate Trackers	27.00	23%	Impacts on ESJ Communities	15.80	14%	
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B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Jason Zeller	2020	5	\$410	D.19-11-014	\$2,050.00			
Jason Zeller	2021	25.50	\$700	D.23-07-013	\$17,850.00			
Jason Zeller	2022	41	\$725	D.24-05-016	\$29,725.00			
Jason Zeller	2024	28.25	\$770	D.25-12-039 ⁷	\$21,752.50			
Jason Zeller	2025	9	\$795	D.25-12-039 ⁸	\$7,155.00			

⁷ <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M591/K808/591808684.PDF>

⁸ *Ibid.*

CLAIMED						CPUC AWARD		
Jane Krikorian	2021	2	\$350	D.21-12-050	\$700.00			
Tyson Siegele	2024	45.3	\$345	D.25-12-014 ⁹	\$15,628.50			
Tyson Siegele	2025	25.9	\$360	D.25-12-014 ¹⁰	\$9,324.00			
Subtotal: \$104,185.00						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 \$
Tyson Siegele	2026	12.3	\$187.50	1/2 2026 Rate Request See Comme 3	\$2,306.25			
Jason Zeller	2026	4	\$410	1/2 2026 Rate Request See Comme 1	\$1,640.00			
Jane Krikorian	2026	8.50	\$282.50	1/2 2026 Rate Request See Comme 2	\$2,401.25			
Subtotal: \$6,347.50						Subtotal: \$		
COSTS								
#	Item	Detail			Amount	Amount		
1.								
2.								
Subtotal: \$						Subtotal: \$		
TOTAL REQUEST: \$110,532.50						TOTAL AWARD: \$		

⁹ <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M590/K650/590650560.PDF>

¹⁰ *Ibid.*

CLAIMED		CPUC AWARD	
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. 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.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate</p>			
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ¹¹	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Jason Zeller	March 21, 1989	139577	No
Jane Krikorian	January 3, 2025	359865	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
Comment 1 COLA Increase for Jason Zeller	<p>2026: UCAN requests a 2026 rate for Mr. Zeller of \$820. This rate is derived by applying the proper escalation rates of 3.35% for 2026, as published by the Commission in the 2026 version of the hourly rate chart for intervenor compensation (see https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/administrative-law-judge-division/documents/icompmaterials/hourlyratechart-02102026.xlsm).</p> <p>The resulting 2026 rate is \$821.63 rounded up to the nearest \$5, equals \$825. However that exceeds the hourly rate range for Mr. Zeller's rate category according to the Market Rate Study. Thus, UCAN limits the rate request for Mr. Zeller's 2026 rate to \$820.</p>
Comment 2 Rate Request for	<p><u>Request for 2025 Hourly Rate Pursuant to Resolution ALJ-393</u></p> <p>UCAN Representative: Jane Krikorian Labor Role: Legal – Attorney</p>

¹¹ 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
Jane Krikorian	<p>Level: III (5-10 yrs experience) 2025 Hourly Rate Range (estimated): \$379 - \$589 Requested Hourly Rate: \$545</p> <p>UCAN requests a new rate for Ms. Jane Krikorian in the Attorney category based on her recent admittance to the California Bar in January 2025. Ms. Krikorian’s previous categorization was set in 2021 per D.21-12-050 as an Expert: Public Policy Analyst, Level III. Due to Ms. Krikorian’s legal experience and years practicing before the Commission, UCAN requests Ms. Krikorian be placed in the Attorney category also at Level III.</p> <p>Ms. Krikorian has 17 years of legal experience, with the past 11 years at UCAN steadily increasing her responsibilities and practice experience before the Commission. Prior to joining UCAN and after receiving her Juris Doctorate in 2010, Ms. Krikorian spent several years as a law clerk at the Legal Aid Society of San Diego assisting in the administrative law areas of the Internal Revenue Service (IRS) and Social Security Administration (SSA). While in law school at California Western School of Law, Ms. Krikorian gained extensive legal research experience working as a law clerk for constitutional law professor Michael R. Belknap (2008-2010).</p> <p>In February 2014, Ms. Krikorian was hired at UCAN. Since then, she has increased her responsibilities and practice experience before the Commission. This includes increased involvement in UCAN’s overall advocacy strategies and efforts to contain the increasing costs of electricity on behalf of ratepayers. Ms. Krikorian has helped develop UCAN’s legal and policy positions in numerous energy-related proceedings including Integrated Resource Planning, Power Charge Indifference Adjustment, Transportation Electrification, and more recently the Rulemaking to Advance Demand Flexibility through Electric Rates and the Rulemaking to Modernize the Electric Grid for a High Distributed Energy Resources Future. Ms. Krikorian has been involved in several General Rate Cases and Cost-of-Capital proceedings. Ms. Krikorian’s involvement in proceedings includes working with expert consultants and witnesses to develop and file testimony, preparing for evidentiary hearings and cross-examining witnesses, writing briefs and submitting comments on Commission rulings and proposed decisions. Ms. Krikorian continues to develop her expertise at the Commission with her recent involvement in proceedings on safety, reliability and ratesetting.</p> <p>The Market Rate Study Hourly Rate Chart lists that an Attorney in Level III should have a JD or equivalent degree, 5-10 years of experience, and be licensed to practice law. It also notes that, “Higher experience levels should have experience with areas of law and procedures relevant to CPUC matters...” Due to Ms. Krikorian’s 11 years at UCAN and relevant experience of practicing in front of the Commission, her JD and</p>

Attachment or Comment #	Description/Comment
	<p>recent admittance to the CA State Bar, UCAN requests Ms. Krikorian’s rate be established at \$545 which should be between the Median Range and High Range for 2025. UCAN believes this is a just and reasonable rate based on the parameters of the Market Rate Study for an Attorney Level III and Ms. Krikorian’s education, higher experience level and recent admittance to the California State Bar. UCAN appreciates the Commission’s consideration of this request for Ms. Krikorian.</p> <p>Rate Request for 2026: UCAN requests a 2026 rate for Ms. Krikorian of \$565. This rate is derived by applying the proper escalation rates of 3.35% for 2026, as published by the Commission in the 2026 version of the hourly rate chart for intervenor compensation (see https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/administrative-law-judge-division/documents/icompmaterials/hourlyratechart-02102026.xlsm).</p> <p>The resulting 2026 rate is \$563.25 rounded up to the nearest \$5, equals \$565. [\$545 x 1.0335 = \$563.25 rounded up to the nearest \$5 increment = \$565].</p>
<p>Comment 3 COLA Increase Request for UCAN’s Expert Tyson Siegele</p>	<p>Tyson Siegele Hourly Rate Justification</p> <p>Mr. Siegele has been recognized as an expert before the Commission in numerous proceedings. See below for Commission-approved rates for 2024 and 2025. In this request, UCAN requests a 2026 rate of \$375 for Mr. Siegele. See below for the rate calculation.</p> <p>2024: CPUC-approved rate for Mr. Siegele, \$345 in D.24-11-021: https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M546/K024/546024533.PDF</p> <p>2025: CPUC-approved rate for Mr. Siegele, \$360 in D.25-12-014: https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M590/K650/590650560.PDF</p> <p>2026: UCAN requests a 2026 rate for Mr. Siegele of \$375. This rate is derived by applying the proper escalation rates of 3.35% for 2026, as published by the Commission in the 2026 version of the hourly rate chart for intervenor compensation (see https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/administrative-law-judge-division/documents/icompmaterials/hourlyratechart-02102026.xlsm).</p> <p>The resulting 2026 rate is \$372.06 rounded up to the nearest \$5, equals \$375. [\$360 x 1.0335 = \$372.06 rounded up to the nearest \$5 increment = \$375].</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?	
---	--

If so:

Party	Reason for Opposition	CPUC Discussion

B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	
--	--

If not:

Party	Comment	CPUC Discussion

(Green items to be completed by Intervenor)

FINDINGS OF FACT

1. **UTILITY CONSUMERS' ACTION NETWORK** [has/has not] made a substantial contribution to D.25-12-044, D.22-08-023.
2. The requested hourly rates for **UTILITY CONSUMERS' ACTION 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. **UTILITY CONSUMERS' ACTION NETWORK** is awarded \$ _____.
2. Within 30 days of the effective date of this decision, _____ shall pay **UTILITY CONSUMERS' ACTION NETWORK** the total award. [for multiple utilities: "Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay **UTILITY CONSUMERS' ACTION 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 **UTILITY CONSUMERS' ACTION 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.22-08-023, 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
UTILITY CONSUMERS' ACTION NETWORK	2/20/2026	\$110,532.50		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Jason	Zeller	Attorney	\$410	2020	
Jason	Zeller	Attorney	\$725	2022	
Jason	Zeller	Attorney	\$770	2024	
Jason	Zeller	Attorney	\$795	2025	
Jason	Zeller	Attorney	\$820	2026	
Jane	Krikorian	Advocate	\$350	2021	
Jane	Krikorian	Attorney	\$565	2026	
Tyson	Siegele	Expert	\$345	2024	
Tyson	Siegele	Expert	\$360	2025	
Tyson	Siegele	Expert	\$375	2026	

Revised March 2023

(END OF APPENDIX)

Utility Consumers' Action Network R.18-07-006 Timesheet

Issues	D.22-08-023
1	Affordability Ratio Calculator
2	Input: Income and Housing Costs from U.S. Census Bureau
3	Water Tracker
4	Affordability Metrics in Water Applications
5	Informing Communications Resources

UCAN Staff Attorney Jason Zeller

Date	Task	Hours	Issue 1	Issue 2	Issue 3	Issue 4	Issue 5	PP	II
D.22-08-023									
9/11/2020	Read Cal Adv Motion to Amend the Scope of the Second Phase of R.18-07-006	0.50							0.50
9/14/2020	Review of existing proceeding to prepare response to Cal Adv. Motion	1.50							1.50
9/16/2020	Prepare Response in Support of Public Advocate's Motion later granted by the ALJ on Oct. 21, 2020	3.00						3.00	
10/22/2021	PHC - attended by Jane Krikorian, hours listed below								
11/8/2021	Begin reviewing ALJ Ruling and Staff Proposal on Affordability Metrics Implementation	2.50							2.50
11/9/2021	Continue reading Staff Proposal on Affordability Metrics Implementation in preparation for workshop Nov. 15, 2021	2.00							2.00
11/11/2021	Continue reading Staff Proposal on Affordability Metrics Implementation in preparation for workshop Nov. 15, 2021	2.00							2.00
11/12/2021	Begin writing comments on scoping memo and Staff Proposal	3.00	1.50	0.75	0.75				
11/14/2021	Continue writing comments on scoping memo and Staff Proposal	2.00	0.75			0.75	0.50		
11/15/2021	Attend half-day workshop on Staff Proposal and Affordability Metrics	4.00	1.00	1.00	0.50	0.50	1.00		
11/30/2021	Attend workshop to discuss issues with Water Rate and Bill Tracker Template	2.00			2.00				
12/6/2021	Attend workshop to discuss issues with Water Rate and Bill Tracker Template	2.00			2.00				
12/13/2021	Attend workshop to discuss issues with Water Rate and Bill Tracker Template	2.00			2.00				
12/15/2021	Continue writing comments on scoping memo and Staff Proposal with post workshop information	2.00	1.00					1.00	
1/6/2021	Continue writing comments on scoping memo and Staff Proposal with post workshop information	2.00		1.00				1.00	
1/10/2022	Finalize comments on scoping memo and Staff Proposal due today Jan. 10, 2022	4.00	1.50	0.75	0.25	1.00	0.50		
2/24/2022	Review Agenda and Participant Bios attached to email to service list for upcoming webinar; email invite to service list	1.50							1.50
2/24/2022	Review reply comments on Staff Proposal in preparation for upcoming webinars	1.50							1.50
2/28/2022	Attending Commissioners webinar on Affordability	7.00	1.00	1.00	1.00	1.00	1.00		2.00
3/1/2022	Attending Commissioners webinar on Affordability	5.50	1.50	1.00	0.50	1.00	0.50		1.00
6/27/2022	Reviewing PD for drafting PD Comments	2.00							2.00
6/28/2022	Preparing Opening Comments on PD re affordability metrics	1.00						1.00	
6/29/2022	Writing Opening Comments on PD re affordability metrics	4.00	1.00			2.00		1.00	
6/30/2022	Finalizing Opening Comments on PD re affordability metrics due today, June 30, 2022	1.00						1.00	
7/1/2022	Review Opening Comments of Other Parties	2.00							2.00
7/5/2022	Writing Reply PD Comments	3.00	3.00						
7/6/2022	Finalizing Reply PD Comments due July 8, 2022	2.00	2.00						
	Total Hours for D.22-08-023	65.00	14.25	5.50	9.00	6.25	5.50	6.00	18.50

Issues	D.25-12-044
1	Affordability Framework Usefulness
2	Usefulness of the Cost and Rate Trackers
3	Impacts on ESJ Communities

Date	Task	Hours	Issue 1	Issue 2	Issue 3				
11/28/2022	Writing responses to ALJ questions from Ruling on Oct. 13, 2022	4.00	2.00	2.00					
11/29/2022	Writing responses to ALJ questions for Comments due Nov. 30, 2022	2.50	1.50	1.00					
1/11/2024	Review of Assigned Commissioner's Ruling. Preparation of UCAN Answers	2.00	0.70	0.70	0.60				
1/15/2024	Preparation of UCAN Answers to ALJ Ruling issued Dec. 14, 2023	4.00	2.00	2.00					
1/22/2024	Preparation of UCAN Answers to ALJ Ruling issued Dec. 14, 2023	6.00	3.00	2.00	1.00				
1/24/2024	Meeting with Tyson Siegle to discuss draft answers	1.00	0.50		0.50				
1/24/2024	Draft review and finalization of answers to ALJ Questions; Comments due Jan. 25, 2024	4.00	2.00	1.00	1.00				
2/1/2024	Review Opening Comments of Other Parties on ALJ Questions	4.00	2.00	1.00	1.00				
2/5/2024	Preparation of UCAN Reply Answers to ALJ Questions from Ruling issued Dec. 14, 2023	2.00	1.00	0.50	0.50				
2/7/2024	Preparation of UCAN Reply Answers to ALJ Questions	3.00	1.50	1.00	0.50				
2/8/2024	Preparation of Reply Answers to ALJ Questions	2.00	1.00	1.00					
2/12/2024	Meeting with Tyson Siegle on Reply Answers due Feb. 16, 2024	0.25	0.25						
12/3/2025	Writing final sections of Opening Comments on Proposed Decision due today	7.00	3.00	3.00	1.00				
12/8/2025	Write Reply Comments on Proposed Decision due today	2.00	1.00	1.00					
	Total Hours for D.25-12-044	43.75	21.45	16.20	6.10				
	Total Hours for D.22-08-023 & D.25-12-044	108.75							

Intervenor Compensation

Date	Task	Hours							
2/11/2026	Working on ICOMP form	4.00							
		4.00							

Hours by Year

Year	Hours
2020	5.00
2021	25.50
2022	41.00
2024	28.25
2025	9.00
	108.75

UCAN Representative Jane Krikorian

Issues	D.22-08-023
1	Affordability Framework Usefulness
2	Usefulness of the Cost and Rate Trackers
3	Impacts on ESJ Communities

Date	Task	Hours	Issue 1	Issue 2	Issue 3	Issue 4	Issue 5	PP	II
10/22/2021	Attend PHC in lieu of Mr. Jason Zeller who was on vacation	2.00						2.00	
	Total Hours for D.22-08-023	2.00						2.00	

Intervenor Compensation

Date	Task	Hours							
2/16/2026	Editing ICOMP form	1.00							
2/17/2026	Editing ICOMP form	6.50							
2/18/2026	Editing ICOMP form	1.00							
		8.50							

Hours by Year

Year	Hours
2021	2.00
	2.00

UCAN Expert Tyson Siegle

Issues	D.25-12-044
1	Affordability Framework Usefulness
2	Usefulness of the Cost and Rate Trackers
3	Impacts on ESJ Communities



404 Euclid Ave. Suite 377, San Diego, CA 92114
(619) 696-6966 • www.UCAN.org

Via email (tyson@cleanstrat.com)

January 31, 2024

Mr. Tyson Siegele
Clean Energy Strategies

RE: R.18-07-006 (“Affordability”)

Dear Tyson:

The Utility Consumers’ Action Network (UCAN) provides the following proposal for your consultant services in the Order Instituting Rulemaking to Establish a Framework and Processes for Assessing the Affordability of Utility Service.

Background

In this long-running proceeding before the California Public Utilities Commission (CPUC), UCAN is a Party and has intervened, participated, and contributed substantially to prior phases and decisions. Recently, the CPUC issued a Decision (D.22-08-023) implementing the affordability metrics, (Phase 2 Affordability Decision) and thereby established a multi-year period of assessment on the implementation of the affordability metrics, particularly how it informs consideration of utility requests to increase rates and helps stakeholders to consider affordability and equity when designing programs. Parties have been requested to share perspective on whether and how the affordability metrics informed consideration of the issues in these proceedings.

Scope of Services

1. Respond to all technical research and analysis requests made by UCAN related to the proceeding;
2. Prepare questions and requests for data for use in the discovery process;
3. Review responses to discovery and provide technical expertise in “meet and confer” events as required to obtain requested data;
4. Attend proceeding workshops or other proceeding events;
5. Aid UCAN attorneys/staff in preparing filings by:
 - a. providing technical advice and recommendations,
 - b. writing technical memos (research and analysis),

- c. and/or drafting of formal comments.
- 6. Complete research verifying or refuting other parties' claims;

Estimated Budget

The table below estimates the budget for Consultant's work on the proceeding.

Budget Estimate: Proceeding: R.18-07-006 Affordability		
Task	Time Est. (hrs)	Total (Including pre-IC payments)
Review and analyze data submitted in the record	10	\$3,300
Review parties' comments	40	\$13,200
Research claims made by parties	40	\$13,200
Provide calculations, analysis, and technical memos refuting false claims and supporting UCAN's positions	60	\$19,800
Estimated total	150	\$49,500

Compensation:

Consultant will provide UCAN with timesheets each month.

The intervenor compensation rates are below:

Tyson Siegele	Intervenor Compensation Rate
2023 Icomp rate	\$330
2024 Icomp rate	TBD (2023 rate w CPUC escalation applied)
2025 Icomp rate	TBD (2024 rate w CPUC escalation applied)

All work during this proceeding will be performed in consultation with, and by authorization of, UCAN. Work will be performed in a timely and professional manner.

UCAN will pay Consultant \$1,000 per month for the proceeding covered in this agreement. The remaining hourly billings will be deferred pending the receipt of UCAN's intervenor compensation from the CPUC. UCAN will file an intervenor compensation request for all hours worked by Consultant on the proceeding. When the CPUC issues a decision awarding intervenor compensation, Consultant and UCAN will reconcile payments consistent with the CPUC's intervenor compensation decision. UCAN will pay Consultant the amount that the CPUC awards for Consultant's hours minus UCAN's prior payments to Consultant under this agreement that

were not previously recouped by UCAN through a prior CPUC intervenor compensation award for Consultant's work. In accordance with the structure detailed in this paragraph, UCAN will issue payment to Consultant for intervenor compensation within 30 days of receiving intervenor compensation.

Consultant understands that the Commission may not fully reimburse UCAN for work performed by Consultant or may not approve the requested hourly rates. In that event, UCAN will reimburse Consultant in the amount, and at the rate, awarded by the CPUC. This compensation shall be considered full and final payment on all Consultant invoices provided and associated with the matter. Consultant acknowledges that the final billing rate for purposes of intervenor compensation will be determined by the CPUC.

Agreement Status

At the signing of the agreement, the agreement enters active status.

Parties to the agreement may, by mutual written agreement, move the agreement to inactive status. When the agreement is in inactive status, Consultant will not receive monthly payments, will not provide work on the proceeding, and will not track or submit timesheets to UCAN.

Parties to the agreement may, by mutual written agreement, return the agreement to active status. When the agreement returns to active status, all parties will resume their responsibilities under each section of the agreement.

Termination of Agreement

This Agreement is terminable by either party at any time, effective upon 30 days written notice to the other party.

Continuing Obligations

UCAN shall file for intervenor compensation for Consultant for all hours that Consultant submits to UCAN prior to the effective end data of this agreement. The intervenor compensation request shall be filed in accordance with CPUC rules. Consultant will be paid by UCAN in accordance with "Compensation" section of this agreement.

This letter, and the terms and conditions set forth within, constitute the Consultant Agreement based on this scope of work and proposal as reviewed and discussed to date. Please feel free to contact us if you have questions or comments about the terms and conditions set forth. If, however, you agree to the Consultant Agreement, please sign, and return to UCAN.

We look forward to working with you on this proceeding.

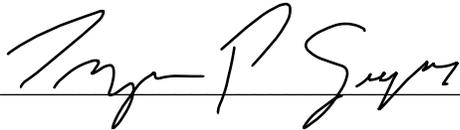
Sincerely,



Edward Lopez
Executive Director
UCAN

AGREED:

For Tyson Siegele, Clean Energy Strategies:



Name

February 28, 2024

Date

JANE KRIKORIAN

Attorney/Regulatory
Program Manager
jane@ucan.org

Legal professional with experience developing positions on energy and ratemaking policy before the California Public Utilities Commission (CPUC). Advance positions on reasonable, reliable and affordable rates before the CPUC.

Skills & Expertise

- Drafting and filing legal pleadings
- Coordinating experts
- Managing CPUC participation
- Conducting legal and policy research
- Developing strategies
- Advancing policy positions

Professional Experience

Utility Consumers Action Network (UCAN)
Regulatory Program Manager

2014-present

- Legal advocacy on behalf of utility ratepayers before the California Public Utilities Commission (CPUC).
- Coordinate legal staff with CPUC proceedings and strategic direction for UCAN
- Provide representation on all aspects of regulatory litigation for assigned proceedings.
- Coordinate strategy with experts and other intervenors on CPUC proceedings.
- File protests, submit testimony, attend hearings and workshops, write briefs and submit comments on ratepayer protection issues to ensure reasonable, reliable and affordable rates.
- Managed finances and assisted in preparing yearly budgets of approximately \$600,000.

Legal Aid Society of San Diego – Social Security
Law Clerk

2013

- Review and compile medical records to develop and submit claim to Social Security Administration.
- Research and analyze pertinent laws, codes, and statutes of government agencies administering public benefits.

Legal Aid Society of San Diego – Low-Income Tax Clinic
Law Clerk

2011-2012

- Research and analyze statutes and case law to ascertain correct course of action.
- Draft complex tax documents to help resolve issues for clients before IRS.

California Western School of Law, San Diego, CA
Legal Research Assistant

2008-2010

- Conduct legal research for constitutional law professor for published books and papers.

Education

Juris Doctorate, California Western School of Law, San Diego
Bachelor's Degree, Communications, University of California, San Diego