



Decision _____

FILED

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

02/20/26

04:19 PM

R1807006

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

Rulemaking 18-07-006
(filed July 12, 2018)

INTERVENOR COMPENSATION CLAIM OF SMALL BUSINESS UTILITY ADVOCATES AND DECISION ON INTERVENOR COMPENSATION CLAIM OF SMALL BUSINESS UTILITY ADVOCATES

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: Small Business Utility Advocates (SBUA)	For contribution to Decision (D.) 25-12-044
Claimed: \$78,513.63	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/ Jennifer Weberski
Date: February 20, 2026	Printed Name: Jennifer Weberski

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

A. Brief description of Decision:	D.25-12-044 (the Decision) makes several adjustments to the Commission’s affordability framework to improve consideration of affordability for essential utility services. One adjustment transitions 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
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	Affordability Report provided in response to Executive Order N-5-24. The Decision affirms 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, known as Quarterly Revenue Reports. In addition, the Decision closes the proceeding but recommends next steps for consideration by the Commission to further address affordability issues facing California ratepayers.
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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:		
2. Other specified date for NOI:	October 15, 2021	
3. Date NOI filed:	October 15, 2021	
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.20-08-020	
6. Date of ALJ ruling:	December 23, 2020	
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	R.20-08-020	
10. Date of ALJ ruling:	December 23, 2020	
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		

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

	Intervenor	CPUC Verification
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.25-12-044	
14. Date of issuance of Final Order or Decision:	December 22, 2025	
15. File date of compensation request:	February 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
B.2-3	The NOI was filed pursuant to § 7 of the Fourth Amended Scoping Memo, which was issued on 9/15/2021. The Fourth Amended Scoping Memo required that NOIs be filed within 30 days, or on 10/15/2021.	
B.5-12	<p>SBUA is relying on the ruling on its customer status and showing of significant financial hardship in R.20-08-020 on December 23, 2020, within one year prior to SBUA commencing activities in R.18-07-006 and filing its NOI.</p> <p>SBUA also received a ruling on its customer status and showing of significant financial hardship in A.16-09-001 on October 27, 2017, within one year prior to the filing of R.18-07-006. <i>See</i> Pub. Util. Code § 1804(b)(1).</p>	

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

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

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p><u>1. Small Business Affordability Concerns</u></p> <p>SBUA’s participation spanned from Phase 3 through the proceeding’s conclusion and was focused primarily on (1) advocating for the inclusion of small business and non-residential customer classes in the affordability framework, and (2) actively engaging Commissioners and staff through ex parte communications and joint advocacy with other ratepayer groups to advance affordability priorities.</p> <p>SBUA consistently argued for the Commission to address affordability concerns of small commercial customers. Although other parties supported non-residential metrics generally, SBUA’s advocacy centered specifically on the needs of small business customers. In response to the December 13, 2023 Assigned Commissioner’s Ruling seeking annual feedback on implementation of the Affordability Framework, SBUA submitted opening and reply comments emphasizing the need for a small business specific affordability framework and related metrics.” Opening Comments of Small Business Utility Advocates to Assigned Commissioner’s Ruling Seeking Annual Feedback on</p>	<p>The Commission explains that the record supporting the Final Decision includes party comments in response to both the 2022 and 2023 Assigned Commissioner’s Rulings. Decision at 11, The Commission also addresses SBUA’s recommendations in those comments. Decision at 42 (noting that SBUA and Joint Ratepayers “emphatically request that the Commission develop, and require utilities to calculate affordability metrics for commercial, industrial and small commercial customer classes.”).</p> <p>While the Decision finds it infeasible to develop full non-residential affordability metrics within this proceeding due to the residential design of the existing framework, the Decision does “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.” Decision at 43. Further, the Commission makes several critical concessions responsive to SBUA’s advocacy:</p> <p style="padding-left: 40px;"><u>First</u>, the Decision requires that the Trackers now produce sample bills for small commercial customers on a quarterly basis, a development SBUA actively supported and promoted. Decision at 42 (“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”) (emphasis added), at 50 (“In</p>	

<p>the Implementation of the Affordability Framework, Jan. 25, 2024 (SBUA Opening Comments on Affordability Framework);² Reply Comments of Small Business Utility Advocates to Assigned Commissioner’s Ruling Seeking Annual Feedback on the Implementation of the Affordability Framework, Feb. 16, 2024 (SBUA Reply Comments on Affordability Framework).</p> <p>SBUA further argued that revising the affordability metrics is essential to ensuring small commercial ratepayers receive the benefits and protections afforded to all utility customers under the California Public Utilities Code. SBUA Opening Comments on Affordability Framework at 2. SBUA also emphasized that, absent affordability standards for non-residential customers, neither the utilities nor the Commission can effectively evaluate the economic consequences of rate increases on those ratepayers. SBUA Opening Comments on Affordability Framework at 4; Opening Comments of Small Business Utility Advocates on the Proposed Decision (Dec. 3, 2025) at 2–3.</p>	<p>particular, the electric Trackers summarize rate and bill impacts of not just residential customers but also of small business customers.”); <i>see also</i> Decision at 42, citing fn. 67 (Commission staff working with IOUs on revenue changes and bills for small commercial customers), Finding of Fact (FOF) # 13.</p> <p><u>Second</u>, the Decision affirms that non-residential affordability “will continue to be addressed through GRC Phase 2 proceedings” and that the “definitions and concepts that were adopted in this proceeding can help guide the discussion of affordability concerns” for non-residential classes. Decision at 73.</p> <p><u>Third</u>, in response to SBUA (and Joint Ratepayer) comments on the Proposed Decision, the Decision was revised to further explain the Commission’s acknowledgment that affordability for non-residential customer classes “is important and deserves attention” and to clarify the path forward. Decision at 76-77. SBUA specifically requested the Final Decision correct the Proposed Decisions treatment of commercial customers as a monolith. <i>See</i> SBUA Opening Comments on Proposed Decision Updating the Affordability Framework and</p>	
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² The Decision incorrectly lists SBUA as filing Opening Comments on November 30, 2022; however, the Docket Card of the proceeding correctly reflects SBUA’s January 25, 2024 comments as part of the record.

<p>SBUA’s participation enriched the record and ensured that small business ratepayer concerns were squarely before the Commission. SBUA’s advocacy resulted in several improvements to the Decision, including to the Cost and Rate Trackers (Trackers) and quarterly sample bills for small commercial customers. <i>See</i> Reply Comments on the Proposed Decision Updating the Affordability Framework and Closing the Proceeding, Dec. 8, 2025.</p> <p><u>Environmental and Social Justice (ESJ) Impact.</u> In its analysis on the need for affordability metrics for small business customers, SBUA discussed how commercial class ratepayers face distinctly different economic pressures than residential ratepayers, including related to supply chain challenges; the lingering effect of the pandemic on consumer demand, particularly in areas with high commercial vacancy rates; and the need to increase wages, a primary factor mitigating a utility’s steadily rising rates on residential customers. The impact of rising energy costs also tends to disproportionately harm diverse small businesses in Environmental and Social Justice communities that already face capital constraints. Opening Comments of SBUA on Affordability Framework at 4-5.</p>	<p>Closing the Proceeding, Dec. 3, 2025 (SBUA Opening Comments on PD), at 5.</p> <p>The Decision at 22 also acknowledges SBUA’s comments regarding the affordability frameworks potential impact addressing small business customers, as they pertain to ESJ communities (“SBUA states that focusing on non-residential affordability can advance the Commission’s ESJ plans”).</p> <p>In recognition of the work of the intervenors, including participation in en banc meetings, the Decision at 72-73 states, “The record and recommendations of the parties presented in this proceeding has carried over to other proceedings where the Commission is examining and implementing proposals made during two Commission hosted Affordability en banc events.” (fn. omitted).</p>	
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Ex Parte Communications and Affordability Meetings. SBUA substantially contributed to this proceeding through active participation in ex parte communications, Commission-requested meetings, and stakeholder affordability discussions that materially informed the record and the Commission’s analysis.

Several of these communications were solicited by the Commission. On June 8, 2023, Energy Division requested SBUA’s participation in a call regarding commercial and industrial customer affordability issues, and on November 19, 2024, Commissioner Houck’s office requested that SBUA attend an ex parte meeting with the ratepayer affordability group. The Commission’s direct requests for SBUA’s participation reflect recognition of SBUA’s unique expertise as the sole representative of small commercial customer interests in this proceeding.

Throughout 2022, SBUA attended the February 28 and March 1 Affordability En Banc, participated in preparatory coordination calls with joint ratepayer parties, and engaged in ex parte meetings with Commissioner Rechtschaffen and President Reynolds’s staff to advocate for inclusion of nonresidential affordability considerations in the rulemaking. The Decision

<p>expressly references the En Banc proceedings and party recommendations as informing the Commission’s affordability work. Decision at 72-73. SBUA’s advocacy during this period focused on the need to address commercial customer impacts within the affordability framework, an issue subsequently discussed in the Decision’s treatment of business and commercial customer classes.</p> <p>In 2024 and 2025, SBUA participated in ex parte communications with Commissioners Houck, Reynolds, Baker, and Douglas, advocating alongside other ratepayer representatives for stronger affordability protections and consideration of cumulative rate impacts. The Decision ultimately requires energy utilities to compare rates and revenue trends to general inflation, separated by operational and capital spending. Decision at 31-37.</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>	<p>Yes</p>	

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.

<p>b. Were there other parties to the proceeding with positions similar to yours?</p>	<p>Yes</p>	
<p>c. If so, provide name of other parties:</p> <p>Utility Consumers’ Action Network (UCAN), California Large Energy Consumers Association (CLECA), Energy Producers and Users Coalition (EPUC), the Utility Reform Network (TURN), and California Farm Bureau Federation.</p>		
<p>d. Intervenor’s claim of non-duplication:</p> <p>SBUA’s participation did not duplicate the efforts of other parties. SBUA is the sole representative of small commercial customer interests in this proceeding. While SBUA coordinated with the Joint Ratepayers (CLECA and EPUC) on certain positions, SBUA’s perspective is distinct in that it focuses on the particular needs and affordability challenges facing California’s small businesses, a constituency that is neither residential nor large commercial or industrial. No other party in this proceeding, including Cal Advocates, TURN, or CforAT, represents this customer class. To the extent SBUA’s positions overlapped with those of other parties, such participation served to supplement, complement, or contribute to the presentation of issues by those parties.</p>		

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

#	Intervenor’s Comment	CPUC Discussion
<p>II.A.</p>	<p><u>Partial Success.</u> Although the Commission declined to adopt SBUA’s proposal to develop standalone small business affordability metrics, concluding that such metrics were infeasible within the residential design of the existing framework, SBUA nonetheless made a substantial contribution to the Decision. SBUA expanded the record regarding non-residential affordability, and the importance of the concerns raised by SBUA. The Decision further provides that the Cost and Rate Trackers now produce quarterly sample bills for small commercial customers, improving transparency regarding impacts on that customer class.</p>	

#	Intervenor’s Comment	CPUC Discussion
	<p>Under the Commission’s precedent, a party need not prevail on every issue to make a substantial contribution. A substantial contribution includes evidence or argument that supports part of a decision, even if the Commission does not adopt the party’s position in full. <i>See</i> Intervenor Compensation Program Guide (2017) at 18; D.02-03-033 at 3, 5; Pub. Util. Code § 1802(j); D.08-04-004 at 5-6; D.09-04-027 at 4.</p> <p>The Decision also confirms that non-residential affordability will continue to be addressed in GRC Phase 2 proceedings using the concepts developed in this docket, establishing a forward-looking path consistent with SBUA’s advocacy.</p>	

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>SBUA’s participation in this final phase of the proceeding was merited given the significance of the affordability issues and their impact on small commercial ratepayers. SBUA focused its efforts on reviewing implementation of the Affordability Framework, preparing targeted comments on small business inclusion, and engaging in substantive meetings and ex parte communications regarding non-residential affordability concerns.</p> <p>SBUA obtained party status in 2021, and this is SBUA’s sole intervenor compensation claim in this proceeding.</p> <p>Although the Commission did not adopt SBUA’s proposal to develop standalone small business affordability metrics, SBUA’s advocacy materially contributed to the Decision by expanding the record regarding non-residential affordability and by prompting the Commission to address small commercial customer impacts within the Cost and Rate Trackers.</p>	

	CPUC Discussion
<p>The Decision recognizes that affordability concerns extend across customer classes and provides that the Trackers now produce quarterly sample bills for small commercial customers. Decision at 42, 50. These enhancements materially improve transparency regarding affordability impacts on small commercial ratepayers, a constituency that, absent SBUA’s participation, would have gone unrepresented in this proceeding.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>SBUA efficiently directed its participation in this phase of the proceeding toward reviewing implementation of the Affordability Framework and providing advocacy and comments regarding the inclusion of small business customers.</p> <p>SBUA was represented by mid-level attorney Michael Raykher, who serves as outside counsel and led the effort to draft SBUA’s comments on the Affordability Framework, and by SBUA Litigation Supervisor Jennifer Weberski, a SBUA employee, who coordinated SBUA’s engagement in ex parte and affordability meetings and drafted comments on the Proposed Decision. Ms. Weberski has over 25 years of utility regulatory experience. Drawing on her extensive experience and SBUA’s involvement in related utility proceedings, she participated efficiently in this docket and devoted a reasonable amount of time to this phase of the proceeding.⁴</p> <p>SBUA utilized two experts. SBUA Senior Energy Policy Analyst Ted Howard, a SBUA employee with over 40 years of professional experience, attended several workshops and assisted in developing SBUA’s positions. SBUA also secured input from outside expert Paul Chernick of Resource Insight, Inc. (RII). Mr. Chernick, President of RII, has over 40 years of experience in utility regulation and assisted in developing SBUA’s positions on small business affordability in this proceeding. RII provided services as an outside consultant on a deferred and contingency basis. <i>See Attachment 3</i> (contract between SBUA and RII).</p> <p>In addition, SBUA’s General Counsel, James Birkelund, provided strategic oversight, managed the legal team, and conducted high-level review of, and provided input on, SBUA’s advocacy and positions. Mr. Birkelund was previously an employee of SBUA in 2021 and 2022, but beginning in 2023, he has been employed by E&E Law Corp., which represents SBUA in this matter on a contingency basis at prevailing market rates. Mr. Raykher was also employed by E&E Law Corp. <i>See Attachment 4</i> (Statement of Work detailing contractual terms). The Commission has</p>	

⁴ Attorney Jeffrey Winmill assisted in the proceeding as well, filing SBUA’s NOI and attending a prehearing conference; however, due to his limited engagement SBUA is waiving his time.

	CPUC Discussion
<p>previously approved this outside consultant relationship and its associated attorney-client agreement. <i>See, e.g.</i>, D.25-12-038, D.25-05-023, D.25-05-021, D.25-04-012, D.25-03-029, and D.25-02-025.</p> <p>Given the importance of this OIR and affordability for all ratepayers, including small business customers, SBUA submits that the time recorded reflects an appropriate level of engagement and effort in this phase of the proceeding. Accordingly, SBUA seeks compensation for all hours submitted by its attorneys and experts, as set forth in the attached timesheets.</p>	
<p>c. Allocation of hours by issue: SBUA has assigned the following issue codes:</p> <p>Issue 1 – Affordability Concerns and Small Business – 54.85 hrs/ 51.4% Issue 2 – Environmental & Social Justice - 2.95 hrs/ 2.8% Issue 3 – Ex Parte and Affordability Meetings – 42.35 hrs/ 39.7% Issue 4 – General Participation, including hearings and workshops – 6.5 hrs/ 6.1%</p>	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Jennifer Weberski	2022	12.55	\$675	D.23-12-031	\$8,471.25			
Jennifer Weberski	2023	7.5	\$705	D.24-02-031	\$5,287.50			
Jennifer Weberski	2024	7.55	\$735	D.25-06-029	\$5,549.25			
Jennifer Weberski	2025	15.55	\$760	D.25-06-029, escalated by 3.46% for 2025	\$11,818.00			
Ted Howard	2023	5.3	\$460	D.24-03-070	\$2,438.00			
Paul Chernick	2022	2.0	\$505	D.23-11-031	\$1,010.00			
Michael Raykher	2024	19.2	\$520	D.25-12-038 setting 2023 rate at \$500,	\$9,984.00			

				escalated by 4.07% for 2024				
James Birkelund	2021	3.75	\$650	D.22-08-046	\$2,437.50			
James Birkelund	2022	2.75	\$705	D.23-02-016	\$1,938.75			
James Birkelund	2023	9.75	\$770	D.24-10-025	\$7,507.50			
James Birkelund	2024	7.25	\$800	D.24-12-069	\$5,800.00			
James Birkelund	2025	13.5	\$830	D.25-07-036	\$11,205.00			
Subtotal: \$73,446.75						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 \$
Subtotal:						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
James Birkelund	2021	1.4	\$325	50% of 2021 rate	\$455.00			
Jennifer Weberski	2026	11.75	\$392.5	50% of 2026 Rate (\$785), reflecting a 3.3% escalation over 2025 rate	\$4,611.88			
Subtotal: \$5,066.88						Subtotal: \$		
COSTS								
#	Item	Detail			Amount	Amount		
1.								
2.								
Subtotal: \$						Subtotal: \$		
TOTAL REQUEST: \$78,513.63						TOTAL 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</p>								

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 BAR⁵	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
James M. Birkelund	March 2000	206328	No
Jennifer L. Weberski	Connecticut, 1997; Washington D.C., 2003	Conn. Bar # 414546; D.C. Bar # 481853	No
Mikhail Raykher ⁶	New York, 2013; Maryland, 2013	New York State Bar # 5130653; Maryland State Bar # 1306190253	No

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

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Timesheets of Attorneys & Experts
Attachment 3	Contract with Resource Insight, Inc.
Attachment 4	Statement of Work with E&E Law Corp.

D. CPUC Comments, Disallowances, and Adjustments *(CPUC completes)*

Item	Reason

⁵ This information may be obtained through the State Bar of California’s website.

⁶ Attorney Michael Raykher is also known professionally by the variant spelling Mikhail Raykher.

PART IV: OPPOSITIONS AND COMMENTS
Within 30 days after service of this Claim, Commission Staff
or any other party may file a response to the Claim (see § 1804(c))

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

Party	Reason for Opposition	CPUC Discussion

B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?	
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If not:

Party	Comment	CPUC Discussion

(Green items to be completed by Intervenor)

FINDINGS OF FACT

1. **SMALL BUSINESS UTILITY ADVOCATES** [has/has not] made a substantial contribution to **D.25-12-044**.
2. The requested hourly rates for **SMALL BUSINESS UTILITY ADVOCATES'** 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. **SMALL BUSINESS UTILITY ADVOCATES** is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay **SMALL BUSINESS UTILITY ADVOCATES** the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay **SMALL BUSINESS UTILITY ADVOCATES** 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 is 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 **SMALL BUSINESS UTILITY ADVOCATES**’ 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
SMALL BUSINESS UTILITY ADVOCATES	February 20, 2026	\$78,513.63		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Jennifer	Weberski	Attorney	\$675	2022	
Jennifer	Weberski	Attorney	\$705	2023	
Jennifer	Weberski	Attorney	\$735	2024	
Jennifer	Weberski	Attorney	\$760	2025	
Jennifer	Weberski	Attorney	\$785	2026	
Ted	Howard	Expert	\$460	2023	
Paul	Chernick	Expert	\$505	2022	
Michael	Raykher	Attorney	\$520	2024	
James	Birkelund	General Counsel	\$650	2021	
James	Birkelund	General Counsel	\$705	2022	
James	Birkelund	General Counsel	\$770	2023	
James	Birkelund	General Counsel	\$800	2024	

Revised March 2023

James	Birkelund	General Counsel	\$830	2025	
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(END OF APPENDIX)

ATTACHMENT 2

Rulemaking No. 18-07-006 - Request for Intervenor Compensation
Attachment 2. Time Sheet Records with Allocation of Hours by Issue and Contribution to D.25-12-044

Time Sheet Entries for Jennifer Weberski

Issue Identification

- 1 Affordability Concerns and Small Business
- 2 Environmental & Social Justice
- 3 Ex Parte and Affordability Meetings
- 3 General Participation, including hearings and workshops

<u>Date</u>	<u>Activity</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>
2/18/22	Participate in joint affordability call with parties			1	
2/25/22	Coordination w/ ratepayer group on En Banc talking points			1	
2/28/22	Attend the En Banc on affordability			5	
4/14/22	Prep call with joint parties on affordability			0.75	
4/14/22	Participate in ex parte with Cmr Rechtschaffen & joint ratepayer group			0.45	
4/14/22	Prep with joint parties for ex parte with Reynolds staff			0.5	
5/17/22	Prep with joint parties for ex parte with Reynolds staff			0.75	
5/18/22	Participate in joint affordability call with Pres. Reynolds staff & parties to advocate for nonresidential inclusion in rulemaking			0.75	
6/7/22	Email attorneys re joint affordability call with parties			0.1	
12/5/22	Email regarding request for follow-up mtg with Comm. Houck			0.5	
12/8/22	Email regarding request for follow-up mtg with Comm. Houck			0.5	
12/13/22	Prep call with joint parties on affordability			0.75	
12/14/22	Participate in Commissioner meeting			0.5	
1/5/23	Email communication with joint parties			0.5	
1/25/23	Review and approve filing post-Houck mtg			1	
2/2/23	Internal discussion with J. Birkelund				0.25
2/8/23	Review T. Howard notes on En Banc			1	
4/13/23	Email with Joint ratepayer group on Phase 3			0.25	
5/19/23	Review Phase 3 Scoping Memo	1	0.25		
5/24/23	Email update with Joint ratepayer parties post-Scoping			0.75	
6/7/23	Confirm availability to attend ED call			0.25	
6/8/23	Prep for call including Dec. slides prior to meeting			1.5	
6/8/23	Participate in call with ED per their request for C&I			0.75	
1/17/24	Discuss w/ J. Birkelund staffing and comments on ACR	0.25			
1/24/24	Edit opening comments on ACR	0.5	0.25		
1/30/24	Crrspnd with M. Raykher about reply comments	0.5			
2/14/24	Edit reply comments on ACR	0.75			
11/1/24	Email discussion on Houck request to meet with group			0.5	
11/5/24	Finalize discussion on Houck req. with group			0.5	
11/19/24	Prep for ex parte with ratepayer affordability group			1	
11/19/24	Attend ex parte in SF with Comm. Houck and affordability group			0.8	
12/4/24	Participate in ex parte with Commr. Reynolds on affordability			0.5	
12/13/24	Participate in call with Comm. Baker and affordability group			1	
12/17/24	Participate in meet & greet call with Comm. Douglas & affordability group			0.5	
12/18/24	Attend meeting with ratepayer advocates on affordability impact of rulemaking			0.5	
1/6/25	Prep for ex parte with ratepayer affordability group			1.25	
1/7/25	Participate in ex parte with Pres. Reynolds on affordability			0.5	
1/8/24	Followup email with group on Reynolds ex parte			0.75	
1/9/25	Edit followup ex parte notice for submission	1.25		1.25	

<u>Date</u>	<u>Activity</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>
1/24/25	Attend ratepayer advocates debrief on commission ex parte for next steps			0.8	
3/5/25	Coordination with ratepayer group on affordability			1	
4/6/25	Email coordination with ratepayer group on next steps			1.25	
11/25/25	Analyze PD	1.5			
11/26/25	Email request for ex parte to Comm. Houck staff			0.25	
12/2/25	Draft comments on PD	1.25			
12/3/25	Edit and finalize PD comments	1.25			
12/5/25	Attend ex parte with Comm. Houck and staff on PD in rulemaking			0.5	
12/4/25	Review party comments on PD for reply	1.25			
12/8/25	Draft, edit and finalize reply comments on PD	1.5			
	Totals:	11	0.5	31.4	0.25

Compensation Related Hours

2/14/26	Draft comp claim	3.25			
2/15/26	Draft comp claim	4.5			
2/16/26	Draft comp claim	3			
2/20/26	Finalize comp claim	1			
	Total:	11.75			

**Rulemaking No. 18-07-006 - Request for Intervenor Compensation
Attachment 2. Time Sheet Records with Allocation of Hours by Issue and Contribution to D.25-12-044**

Time Sheet Entries for Michael Raykher

Issue Identification

- 1 Affordability Concerns and Small Business
- 2 Environmental & Social Justice
- 3 Ex Parte and Affordability Meetings
- 3 General Participation, including hearings and workshops

<u>Date</u>	<u>Activity</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>
1/23/24	Detailed analysis of issues in Cmmn Houk's ruling seeking party comments on implmentation of affordability framework	3.3			
1/24/24	Conduct research re affordability of commercial utility rates in CA and review Affordability Report for 2021/2022	2.8			
1/24/24	Legal strategy crrspnd with attorneys about comments	1.4			
1/24/24	Draft and develop SBUA's comments	2	1.6		
1/25/24	Prepare final draft of comments	0.7			
2/10/24	Analyze opening comments filed by stakeholders	1.5			
2/11/24	Cont analyze opening comments filed by stakeholders	1.5			
2/13/24	Draft SBUA's reply comments	3.1			
2/14/24	Confer with attorneys about SBUA's draft reply comments	0.7			
2/16/24	Revise draft reply comments based on feedback received from attorneys	0.6			
	Totals:	17.6	1.6	0	0

**Rulemaking No. 18-07-006 - Request for Intervenor Compensation
Attachment 2. Time Sheet Records with Allocation of Hours by Issue and Contribution to D.25-12-044**

Time Sheet Entries for Ted Howard

Issue Identification

- 1 Affordability Concerns and Small Business
- 2 Environmental & Social Justice
- 3 Ex Parte and Affordability Meetings
- 3 General Participation, including hearings and workshops

<u>Date</u>	<u>Activity</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>
2/3/2023	Confer w SBUA Counsel re strategy on affordabitly and CPUC En Banc			0.3	
2/6/2023	Prep for En Banc on gas mkt impact on gas & elec. prices, incl current gas mkt & forecasts.			0.5	
2/7/2023	Participated in En Banc (9:15 am-1:10 pm), incl issues of high gas & elec prices & impacts on ratepayers, esp sm & diverse bus cstmr, & rate relief			4	
2/8/2023	FU from En Banc, incl issues of utility prices impact on IOU gas & elec rates of ratepayers, esp sm & diverse bus.			0.5	
	Totals:			5.3	

**Rulemaking No. 18-07-006 - Request for Intervenor Compensation
Attachment 2. Time Sheet Records with Allocation of Hours by Issue and Contribution to D.25-12-044**

Time Sheet Entries for Paul Chernick

Issue Identification

- 1 Affordability Concerns and Small Business
- 2 Environmental & Social Justice
- 3 Ex Parte and Affordability Meetings
- 3 General Participation, including hearings and workshops

<u>Date</u>	<u>Activity</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>
5/10/22	outline SBUA positions in Phase 3 for attorneys	1			
5/24/22	outline SBUA positions in Phase 3 for attorneys	1			
	Total:	2			

Rulemaking No. 18-07-006 - Request for Intervenor Compensation

Attachment 2. Time Sheet Records with Allocation of Hours by Issue and Contribution to D.25-12-044

Time Sheet Entries for Jame M. Birkelund

Issue Identification

- 1 Affordability Concerns and Small Business
- 2 Environmental & Social Justice
- 3 Ex Parte and Affordability Meetings
- 3 General Participation, including hearings and workshops

<u>Date</u>	<u>Activity</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>
9/25/21	Analyze 4th Amended Scoping Memo and outline SBUA interests in intervening in case.	1.25	0.25		
10/5/21	Confer w J. Winmill re positions re the same.	0.75			
10/20/21	Strategy call w J. Winmill re his attendance on behalf of SBUA at PHC				0.5
10/27/21	Rev memo and results of PHC from J. Winmill and his appearance.				0.5
12/8/21	Rev Affordability Metrics Staff Proposal.	0.5			
1/19/22	Rev Commissioner Houck's Fifth Amended Scoping Memo and Ruling.	0.5			
2/23/22	Strategy crrespnd w SBUA attorneys re affordability and coordination of efforts w other intervenors.		0.1	0.4	
2/25/22	Rev PG&E Affordability Metrics Report.	0.25			
3/2/22	Crrspnd to J. Weberski re affordability strategies.	0.25			
4/13/22	As above.		0.25		
5/4/22	Rev Written Ex Parte on Affordability by Joint Intervenors.			0.25	
10/13/22	Rev Cmnrs Ruling Seeking cmmts on Use And Interpretation Of The Affordability Framework.	0.25			
10/21/22	Rev PG&E's Q3 CRT and Itemized List of Revenue Requirements.	0.25			
12/7/22	Confer w J. Weberski re follow-up call w Cmmn Houck re affordability.			0.25	
1/18/23	Confer w J. Weberski re Cmmn Houck call and next steps.			0.25	
1/25/23	Confer w J. Weberski re party recommendations for Ph3, including addn attention and information on commercial customers.	0.25			
1/31/23	Rev SJWC's submission of the Affordability Metrics.				0.25
2/2/23	Confer w T. Howard re En Banc re gas market and gas prices on electricity markets.			0.25	
2/8/23	Rev memo from expert re En Banc Meeting on Natural Gas Prices in California.			0.5	
2/14/23	Rev staff crrespnd on draft affordability ratio calculators.				0.5
2/22/23	Rev Ex parte communication from Joint Ratepayers.			0.25	
3/1/23	Rev IOUs' Q4 2022 Gas Itemized List Revenue Requirements.				0.5
3/1/23	Rev emails w IOUs' itemized list of rev reqs Q1 2023.				0.5
3/15/23	Rev PAO's Request for Feedback to ED on Draft 2021-2022 Affordability Ratio Calculator				0.25
5/19/23	Rev 6th Amended Scoping Memo and SBUA interests	0.5			

<u>Date</u>	<u>Activity</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>
6/1/23	Rev SJWC's submission of the Affordability Metrics.				0.25
6/1/23	Rev IOUs' Revenue Requirements Q2 2023.				0.75
6/16/23	Confer w J. Weberski re ED call re ratepayer group in next en banc.			0.25	
8/2/23	Rev parties' Quarterly Bill Trackers.	0.25			
9/1/23	Rev SCE Q3 2023 Itemized List of Electric Rev Req				0.25
10/27/23	Rev 2021/2022 Annual Affordability Report.	0.5			
11/1/23	Crrspnd w J. Weberski re SBUA positions and joining protest.			0.25	
11/16/23	Crrspnd w J. Weberski re SBUA ex parte w CLECA, and others			0.25	
11/28/23	Rev ALJ ruling granting extension on meet and confer.				0.25
12/13/23	Confer w J. Weberski re litigation strategy.			0.25	
12/13/23	Rev IOUs' Revenue Requirements Q4 2023.				0.25
12/13/23	Rev ACR re party feedback on affordability framework.	0.75			
12/15/23	Analyze ALJ ruling requesting party cmmt on affordability metrics.	1.25			
12/20/23	Confer w J. Weberski re addn group ex parte meeting scheduled.			0.25	
1/16/24	Strategy direction w J. Weberski re SBUA cmmts on ALJ ruling.	0.25			
1/18/24	Confer w M. Raykher re cmmts on ALJ Qs.	0.25			
1/25/24	Edits to SBUA cmmts re small business affordability metrics.	0.25			
1/26/24	Confer w J. Weberski re strategy for SBUA reply cmmts.	0.25			
1/29/24	Rev other parties' cmmts on afford framework.	0.5			
2/15/24	Emails w M. Raykher re the same.	0.25			
2/15/24	Rev SBUA 1st draft of reply cmmts.	0.5			
2/16/24	Rev parties' reply cmmts on afford framework.	0.75			
3/11/24	Rev PG&E Q1 2024 Revised - Gas Itemized List Revenue Reqs.				0.25
5/6/24	Rev IOUs revenue requirement filings.				0.5
8/1/24	Rev ALJ ruling requiring IOUs to file Cost and Rate Trackers (Trackers) quarterly.	0.5			
9/4/24	Rev SDG&E Q3 2024 Trackers	0.25			
9/4/24	Rev PG&E Q3 2024 Trackers	0.25			
9/5/24	Rev large IOUs' Q3 2024 Gas Itemized List Rev Req.				0.25
11/2/24	Rev numerous Trackers and Rev Listings	0.75			
11/5/24	Confer w J. Weberski re mtg w Cmmr Houck.			0.25	
11/20/24	Strategy w J. Weberski re small business affordability metrics.	0.5			
11/27/24	Confer w J. Weberski re ex parte w Cmmr Pr. Reynolds.			0.25	
12/6/24	Rev draft Affordability Ratio Calculator (ARC).				0.25
12/11/24	Confer w J. Weberski re mtg w Exec Dir Peterson.			0.25	
1/8/25	Confer w J. Weberski re strategy after Cmmn mtgs.			0.25	
1/15/25	Confer w J. Weberski re mtgs w Cmmnrs and PUC Ex Director.			0.25	
3/3/25	Rev IOUs' Rate Tracking Tools Q1 2025.	0.25			
3/12/25	Strategy w J. Weberski re affordability mtgs w other advocates.			0.25	

<u>Date</u>	<u>Activity</u>	<u>Issue 1</u>	<u>Issue 2</u>	<u>Issue 3</u>	<u>Issue 4</u>
5/1/25	Rev Electric and Gas Cost and Rate Tracking Tools Q4 2024	0.25			
6/4/25	Rev IOUs' Q1 2025 Revised List of Electric Rev Req.				0.25
8/5/25	Rev affordability rate tracker Quarterly Rpts.	0.5			
11/18/25	Analyze PD.	1	0.25		
11/26/25	Confer w J. Weberski re ex parte mtgs.			0.25	
12/2/25	Rev SBUA draft ex parte notice.			0.25	
12/2/25	Draft/edits SBUA op cmmts on PD.	2.5			
12/3/25	Addn edits to op cmmts.	4.75			
12/4/25	Rev other parties' op cmmts.	1.25			
12/9/25	Edits to SBUA reply cmmts on PD.	0.5			
12/10/25	Strategy call W J. Weberski re ex parte w Cmmnr Houck.			0.25	
12/16/25	Rev PD edits re small commercial customer bills.	0.25			
12/23/25	Edit to SBUA cmmts on PD.	0.25			
	Totals:	24.25	0.85	5.65	6.25
	Compensation Related Hours				
10/15/21	Draft/edit NOI.	1.4			
	Total:	1.4			

ATTACHMENT 3

CONSULTING SERVICES AGREEMENT

This **CONSULTING SERVICES AGREEMENT** (“Agreement”) is entered by and between **SMALL BUSINESS UTILITY ADVOCATES** (“Organization”) and **RESOURCE INSIGHT, INC.** (“Consultant”). Each of Organization and Consultant may be referred to herein as a “Party,” collectively, the “Parties.”

WHEREAS, the Parties have maintained an oral agreement for Consultant to provide expert services to Organization before the California Public Utilities Commission (“CPUC”), with compensation deferred and contingent on CPUC-awards at prevailing market rates; and

WHEREAS, both Parties wish to memorialize and formally document their agreement in writing.

THEREFORE, Organization and Consultant agree as follows:

1. Services. Consultant agrees to perform regulatory services as an expert on matters before the California Public Utilities Commission (the “Services”). Consultant will perform those duties customarily associated with a technical expert representing an intervenor before the CPUC, including providing technical analysis, preparing testimony, and serving as an expert witness.

2. Compensation. Consultant shall be compensated for Services on a deferred and contingent basis. Organization will seek intervenor compensation from the CPUC for Consultant’s time at market hourly rates consistent with Commission resolutions, prior decisions, market rate studies, and guidance, subject to cost-of-living adjustments and step-up increases. For the current year of 2025, the Parties agree to seek \$575 an hour as the market rate for Paul Chernick.¹

Consultant acknowledges that the CPUC has sole discretion to determine Consultant’s final hourly rates, compensable hours, and related compensation awards, which may result in partial or no payment for Services. Organization shall pay Consultant only from the actual amounts attributable to Consultant’s work that it receives from the CPUC. Consultant assumes the risk of the Commission cutting, denying, or delaying awards, for whatever reason, including Organization missing CPUC deadlines. In no event will Organization owe more than the amount actually awarded by

¹ This rate is derived from the Commission approved rate of \$505 for 2022, escalated by 4.46% to \$530 for 2023, by 4.07% to \$555 for 2024, and by 3.5% to \$575 for 2025. Because the CPUC’s published annual escalator for 2025 is not yet available, the Parties apply the 3.5% rate derived from Resolution ALJ-393 (p. 4), which bases annual escalation on the Bureau of Labor Statistics Employment

the CPUC and attributed to Consultant’s work. Consultant agrees to provide, in a timely fashion, all necessary time records, resumes, receipts, and other information needed for Organization to file all paperwork required by the CPUC for intervenor compensation requests.

3. Invoices. Consultant may submit periodic statements or invoices, which may include the amount, rate, and basis of calculation or other method of determination of fees and costs. This Agreement prevails over any invoice terms, and all invoiced amounts remain deferred until Organization receives intervenor compensation. Organization will remit final payment to Consultant within 30 days after depositing any such funds.

4. Term and Termination. This Agreement will govern all Services performed by Consultant as of the date Consultant first performed services. This Agreement shall remain in effect until otherwise terminated by either party. The provisions of Sections 4 through 8 shall survive termination of this Agreement.

5. Limitation of Liability. Neither Party is liable for lost profits or indirect, special, incidental, consequential, or punitive damages. Each Party’s total liability is capped at the amounts paid and owed under this Agreement.

6. Confidentiality. Consultant may receive or access Organization’s confidential or proprietary information, including legal work-product. Consultant shall not disclose any confidential information to any third party, except with Organization’s written consent.

7. Relationship of the Parties. Consultant shall for all purposes be considered an independent contractor. Consultant shall have sole discretion and control of expert services and the manner in which they are performed. This Agreement shall not be deemed to create any relationship of agency, partnership, or joint venture.

8. Miscellaneous.

(a) Notices. All notices required or permitted hereunder shall be to the Parties’ respective addresses listed in the signature block. Notice may be given by electronic mail, provided that

Cost Index, Table 5, for “Management, Professional, and Related excluding Incentive Paid Occupations.” (Intervenor Compensation Market Rate Study, Final Report, p. 8; see www.bls.gov/news.release/eci.t05.htm). Consultant has no other staff members working with Organization in 2024 or 2025.

such notice is acknowledged by a return email or is also sent the same day via first class mail.

(b) Entire Agreement. This Agreement merges and supersedes all prior discussions, agreements, understandings, and prior course of dealing between the Parties, and constitutes the entire agreement between the Parties with regard to the subject matter hereof.

(c) Amendment and Waiver. No amendment or waiver of any provision of this Agreement will be binding on either of the Parties unless it is in writing and signed by the Party against which such amendment or waiver is sought to be enforced.

(d) Applicable Law. This Agreement shall be governed by and construed in accordance with the laws of the State of

California without reference to conflict of law principles thereof.

(e) Severability and Interpretation. If a court deems any provision invalid, the Parties intend the court to preserve their original intent, and all other provisions remain in effect. This Agreement is construed without presumption against the drafting Party. Headings are for convenience only and do not affect interpretation.

(f) Counterparts. This Agreement may be executed in counterparts and by the exchange of electronic facsimile or portable document format ("PDF") copies or counterparts of the signature page, which facsimile or PDF copies or counterparts shall be binding upon the Parties.

IN WITNESS WHEREOF, each of the Parties has caused this Agreement to be executed by its duly authorized representative.

SMALL BUSINESS UTILITY ADVOCATES

By:  _____

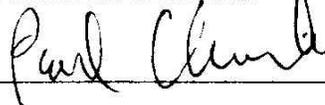
Name: Jesse Horng
Title: Treasurer

Date: February 20, 2025

Address for Notices:

Brittney K. Marra
Executive Director
Small Business Utility Advocates
548 Market St., #11200
San Francisco, CA 94104
Email: britt@utilityadvocates.org

RESOURCE INSIGHT, INC.

By:  _____

Name: Paul Chernick
Title: Senior Public Policy Expert

Date: February 20, 2025

Address for Notices:

Paul L. Chernick
Resource Insight, Inc.
10 Court Street
PO Box 232
Arlington, MA 02476
Email: pchernick@resourceinsight.com

ATTACHMENT 4

STATEMENT OF WORK

This Statement of Work (SOW) is issued pursuant to the Consultant and Fee Agreement dated on or around April 18, 2025 (Agreement), by and between Small Business Utility Advocates (Client) and E&E Law Corp. (Consultant) (collectively, the Parties). This SOW relates to the Parties' work in R.18-07-006 (Order Instituting Rulemaking to Establish a Framework and Processes for Assessing the Affordability of Utility Service) (Proceeding).

The Parties agree that Consultant is providing professional services to represent Client as an intervenor in the Proceeding before the California Public Utilities Commission (Commission). Pursuant to the Agreement, Consultant's compensation for services in the proceeding is contingent upon and limited to amounts awarded by the Commission through intervenor compensation, based on Commission-approved market rates. This SOW is contractually binding and further specifies the market rates the Parties intend to seek.

Pursuant to the Agreement, Client will seek, in any intervenor compensation claim, reimbursement for James Birkelund's services as General Counsel at market rates of \$770 per hour in 2023, \$800 per hour in 2024, and \$830 per hour in 2025, and for Michael Raykher's services at \$520 per hour in 2024. All requested hourly rates, time, and costs remain subject to review and approval by the Commission in accordance with applicable intervenor compensation statutes, rules, and Commission precedent.

In accordance with the Agreement, any consultant fees and costs recovered by Client in this proceeding for work performed by Consultant shall be paid and disbursed in full to E&E Law Corp. This does not include any compensation awarded for work performed by Client's in-house staff or other non-Consultant representatives.

All terms and conditions of the Agreement remain in full force and effect.

IN WITNESS WHEREOF, the Parties hereby execute this Statement of Work:

Client

By: Jennifer Weberski
Jennifer Weberski
Litigation Supervisor
Small Business Utility Advocates
Date: February 9, 2026

Consultant

By: James M. Birkelund
James M. Birkelund
Attorney
E&E Law Corp.
Date: February 17, 2026