

**PUBLIC UTILITIES COMMISSION**505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298**FILED**

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R2207005

March 6, 2026

Agenda ID #24085
Ratesetting

TO PARTIES OF RECORD IN RULEMAKING 22-07-005:

This is the proposed decision of Administrative Law Judge Carolyn Sisto. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's **April 9, 2026**, Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties to the proceeding may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure. Electronic copies of comments should also be sent to the Intervenor Compensation Program at icompcoordinator@cpuc.ca.gov.

/s/ MICHELLE COOKE

Michelle Cooke

Chief Administrative Law Judge

MLC: smt

Attachment

Decision **PROPOSED DECISION OF ALJ SISTO** (Mailed 3/6/2026)**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**Order Instituting Rulemaking to Advance
Demand Flexibility Through Electric Rates.

Rulemaking 22-07-005

**DECISION GRANTING COMPENSATION TO UTILITY CONSUMER'S
ACTION NETWORK FOR SUBSTANTIAL CONTRIBUTION
TO DECISIONS (D.) 24-01-032 AND (D.) 25-08-049**

Intervenor: Utility Consumer's Action Network	For contribution to Decision (D.) D.24-01-032, D.25-08-049
Claimed: \$99,361.60	Awarded: \$50,686.41
Assigned Commissioner: John Reynolds	Assigned ALJ: Carolyn Sisto

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	<p>UCAN is making a claim for substantial contributions in the following two decisions:</p> <p><u>Decision (D.) 24-01-032 (January 26, 2024 – Expand Pilots)</u> This decision directed PGE and SCE to expand several demand flexibility pilots previously authorized in D.21-12-015 to provide summer reliability benefits between June 1, 2024 and December 31, 2027. The decision also listed additional requirements for the utilities including ME&O, benefit measurements, and some dual participation with other programs.</p> <p><u>D.25-08-049 (August 28, 2025 – DF Rate Design)</u> This decision adopted guidelines for PGE, SCE and SDG&E to design demand flexibility (DF) rates and comply with the CEC Load Management Standards. The decision also provided guidance for how various cost components should be incorporated into demand flexibility rate proposals to provide accurate price signals that promote economically efficient load shifting and support grid reliability. Also adopted in this decision was guidance for customer options that promote load shifting in response to flexible rates while minimizing bill impacts.</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:	September 16, 2022	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	October 17, 2022	Verified
4. Was the NOI timely filed?		Yes
Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	A.21-12-006	Verified
6. Date of ALJ ruling:	May 27, 2022	Verified
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	A.21-12-006	Verified
10. Date of ALJ ruling:	May 27, 2022	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.25-08-049	Verified
14. Date of issuance of Final Order or Decision:	August 29, 2025	Verified
15. File date of compensation request:	October 27, 2025	Verified
16. Was the request for compensation timely?		Yes

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

PART II: SUBSTANTIAL CONTRIBUTION

A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059):

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p><u>Note to IComp Coordinator:</u> This is UCAN’s third intervenor compensation request in this proceeding. UCAN previously made requests in D.23-04-040 (Rate Design Principles) and D.24-05-028 (IGFC). All hours related to the beginning of this proceeding – comments on the OIR, post-PHC statement, comments on scoping memo – all hours on Rate Design Principles, and all hours related to the IGFC, have been claimed (however, these previous IComps do not include the ongoing BSC work). This claim, as noted above, is for the decisions to expand system reliability pilots and adopt guidelines for PGE, SCE and SDGE on demand flexibility rate design proposals.</p> <p>UCAN starts by discussing the Working Group Report (WG Report) from D.25-08-049 as the work in this part of the proceeding also informed UCAN’s work in the expanding pilots proceeding and D.24-01-032. Some of the WG Report includes informal discussions between UCAN expert Samuel Golding and Energy Division Staff that informed the final Report. UCAN includes information to verify discussions, if necessary. All other work citations can be found on the Docket Card and CPUC DFOIR webpage.</p>		<p>Noted</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p><u>D.25-08-049: Working Group Report and Process</u></p> <p>UCAN participated actively in the Working Group workshops and process, and contributed feedback that was incorporated into the final Working Group Report:</p> <p>UCAN provided feedback and recommendations on various aspects of participant proposals and the draft Working Group Report.</p> <p>The Joint IOUs provided three clarifications regarding Scoping Questions 4a and 4b in response to UCAN’s comments, including acknowledging that the summary table describing Energy Division (“ED”) / TeMix’s proposal was inaccurate regarding transmission pricing and would be corrected in the final report.</p> <p>UCAN also undertook research to address questions posed by ED Staff at the Working Group meeting held on July 21, 2023 — which requested examples of hourly retail transmission pricing in other states — and documented its findings in comments that were included in the final Working Group Report.</p> <p>At the Working Group meeting held on October 17, 2023:</p> <p>(1) UCAN verbally summarized its findings addressing ED Staff’s prior questions seeking examples from other states where hourly retail transmission pricing had</p>	<p>See WG Report at 123-124, 164, 229, 252, 265-266, filed October 11, 2023 by SCE.</p> <p>See WG Report at 257, Section 4.6 Joint IOU WG 2 Proposal Addendum (Post Comment Period), Response #s 1, 2a, and 3.</p> <p>“UCAN correctly points out that the Joint IOU summary table included in Section 4.5 includes a misstatement regarding the ED / TeMix proposal’s characterization of Transmission as a fixed cost. It is correct that the ED / TeMix proposal potentially includes Transmission. The summary table should actually read (changes in red)...”</p> <p>See Working Group Report at 48-53 and 103-110.</p> <p>See DFOIR Workshop (Part 3 Recording), October 17, 2023, discussion at 1:46:17 to 1:54:37. Found on CPUC website at: https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-costs/demand-response-dr/demand-flexibility-rulemaking under “Background Workshops and Working Group Materials.”</p>	<p>Noted. The time claimed for emailing Energy Division staff regarding the omission and redistribution of CalCCA workshop slides reflects administrative coordination rather than substantive participation. Such procedural communications do not constitute compensable activity under the Intervenor Compensation Program and are therefore disallowed.</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>been implemented, and initiated a discussion regarding potential mechanisms to streamline FERC approval for state-authorized changes to retail transmission rates.</p> <p>(2) UCAN identified that PG&E and SCE had proposed different processes to gain Commission and FERC approval for changes to retail transmission rates, and initiated a discussion seeking clarifications regarding both proposed approaches; ED staff committed to following up with PG&E and SCE to understand their different processes, and thanked UCAN’s expert Samuel Golding for raising the issue for discussion.</p> <p>(3) UCAN initiated a discussion between SCE and ED Staff clarifying that the utility was intending to request a five-year delay in implementing LMS compliant rates from the CEC in the event that the Commission approved the utility’s proposed 3-year pilot extension timeline.</p> <p>After the workshop, UCAN identified that ED staff had inadvertently omitted CalCCA’s workshop presentation slides for follow-up distribution to participants for review, cc’ing CalCCA to provide the slide deck to ED staff, and followed up with ED staff to remind them to disseminate the slides; ED staff subsequently thanked UCAN for the reminder and distributed the slides to participants.</p>	<p>See DFOIR Workshop (Part 3 Recording), October 17, 2023, discussion at 1:36:54 to 1:42:29.</p> <p>See DFOIR Workshop (Part 2 Recording), October 17, 2023, discussion at 2:07:51 through 2:17:20.</p> <p>See if necessary email exchange from October 25, 2023 to October 31, 2023, between UCAN’s expert Samuel Golding and Energy Division Staff Parimalram Madduri, titled “Demand Flexibility OIR (R.22-07-005) Workshop on Track B Working Group Proposals - Recording and Slides.”</p>	
<p><u>D.24-01-032 Expand Pilots</u></p>		<p>Noted</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p><i>Issues:</i></p> <p><i>Sec 3.4 Whether to Authorize the Proposed Implementation Budgets & Section 4.4 Whether to Authorize the Proposed Implementation Budget</i></p> <p>UCAN strongly supported the extension and expansion of dynamic rate pilots, recommended that the Commission generally “<i>anticipate and allow for ongoing changes in pilots to be approved via an Advice Letter process</i>” to “<i>avoid ‘hard coding’ pilot requirements</i>” and — after utility pilot budget proposals were distributed for review — questioned whether the large pilot budgets proposed by PG&E / Joint Parties was in ratepayers’ interest, relative to the more modest budget proposal first advanced by ED Staff.</p> <p>The Decision noted UCAN’s general positions at multiple points along with other parties and voiced agreement.</p> <p>Ultimately, the Commission struck a balance between the position of the utilities and the parties who were concerned regarding cost effectiveness, by adopting a lower budget than proposed by the utilities, with a budget range tied to volumes of customer enrollment to mitigate risks to ratepayers, and allowing</p>	<p><i>See Utility Consumers’ Action Network Comments on the August 15, 2023 ALJ’s Ruling on Track B Proposal to Expand Existing Pilots (filed September 25, 2023), at 2 to 3, and see Utility Consumers’ Action Network Final Comments on the ALJ’s August 15, 2023 Ruling on Track B Proposal to Expand Existing Pilots (filed October 25, 2023) at 2 to 3.</i></p> <p><i>See D.24-01-032 at 12 and 13, incld. fn 14 citing to UCAN, incld. fn 38 citing to UCAN, at 23, at 37 and at 43, incld. fn 75 citing to UCAN’s comments, and at 22, stating:</i> “...we share the ratepayer impact concerns raised by CforAT, CEJA, Cal Advocates, and UCAN.”</p> <p><i>D.24-01-032 at 26-27 and 43-44, COL 7, 11 to 13 and 16 at 76-78, and COL 23 to 26 at 79-80, and Attachment A (“Adopted</i></p>	

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<p>PG&E and SCE to employ advice letters to propose modifications to pilot implementation plans as needed to ensure that minimum enrollment levels would be met before the pilots concluded.</p> <p>Sec. 4. SCE Expanded Pilot</p> <p>UCAN objected to SCE’s budget proposal to expand the SCE Dynamic Rates Pilot and identified specific budget elements regarding system and technology costs that were unreasonable.</p> <p>The Decision cited to UCAN, disallowed the specific budget line items identified by UCAN, and approved a lower budget to expand the SCE Dynamic Rates Pilot than the utility had requested.</p> <p>Sec. 9. Whether Other Modifications are Necessary</p> <p>UCAN identified that SCE had informed the CEC that the Commission’s anticipated approval of its pilot would result in the utility requesting from the CEC a ~10-year delay in implementing LMS compliant dynamic rates, observed that this had not been disclosed by SCE to the Commission, and urged the Commission to provide direction regarding “implementation of LMS-compliant RTP rates in a</p>	<p>Implementation Plan Budgets for the Expanded Pilots”).</p> <p>See Utility Consumers’ Action Network Final Comments on the ALJ’s August 15, 2023 Ruling on Track B Proposal to Expand Existing Pilots (filed October 25, 2023) at 2 to 3, including fn 4, citing to SCE’s Pilot Budget at 14.</p> <p>D.24-01-032 at 48-49, including fn 83 citing to UCAN’s comments, COL 26 at 80, and Attachment A at A-3. “We agree with UCAN that SCE’s proposed line items for research and business use case development are not reasonable pilot implementation costs... For the reasons above, it is reasonable to approve the systems and technology budget for the SCE Expanded Pilot described in Attachment A.”</p> <p>See Utility Consumers’ Action Network Reply Comments on the ALJ’s August 15, 2023 Ruling on Track B Proposal to Expand Existing Pilots (filed October 9, 2023) at 2 to 3.</p>	

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p><i>timely fashion.”</i></p> <p>After submitting the above comments, UCAN initiated a discussion with SCE and ED Staff clarifying this issue at the Working Group workshop held on October 17, 2023.</p> <p>UCAN summarized the workshop discussion in final comments and recommended that the Commission to “<i>clarify that extension of demand flexibility pilots should not be used as an excuse by SCE to delay implementation of LMS-compliant RTP rates past 2027.</i>”</p> <p>The Decision cited to UCAN and clarified that “<i>Utility and CCA obligations to offer optional dynamic rates to its electric customers by the deadlines in the CEC’s Amended Load Management Standards are not dependent on prior implementation of dynamic rate pilots or the assessment of pilot results.</i>”</p>	<p>See UCAN DFOIR Workshop (Part 2 Recording), October 17, 2023, discussion at 2:07:51 through 2:17:20. Found on CPUC website at: https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-costs/demand-response-dr/demand-flexibility-rulemaking under “Background Workshops and Working Group Materials.”</p> <p>See Utility Consumers’ Action Network Final Comments on the ALJ’s August 15, 2023 Ruling on Track B Proposal to Expand Existing Pilots (filed October 25, 2023) at 5 to 8.</p> <p>D.24-01-032 at 68 to 69, incl. fn 114 citing to UCAN comments.</p>	
<p><u>D.25-08-049 Demand Flexibility Rates</u></p> <p><i>Sec 3. Process for Compliance with California Energy Commission Load Management Standards & Sec. 4.5 Marginal Transmission Capacity Costs</i></p>		<p>Noted. While the April 24, 2024 Ruling and D.24-01-032 establish procedural direction for the large IOUs’ demand flexibility rate proposals, UCAN does not sufficiently connect its participation in the</p>

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<p>During the Working Group process, UCAN advocated for implementation of hourly transmission pricing in DF rate designs, including by responding to ED Staff’s request for examples of other states that had already implemented hourly retail transmission pricing, and identified the need to clarify the utilities’ different processes and timelines anticipated for approval of hourly retail transmission rates by the Commission and FERC, which ED Staff acknowledged warranted clarification and thanked UCAN for raising.</p> <p>UCAN also elevated attention on this issue in formal comments, first on October 25, 2023, observing that <i>“PG&E’s LMS Compliance Plan assumes that the utility will propose LMS-compliant transmission rates to FERC, and subsequently to the CPUC for approval, whereas SCE’s LMS Compliance Plan assumes that the utility will propose LMS-compliant transmission rates first to the CPUC and subsequently to FERC”</i>, and urging the Commission to <i>“exercise additional oversight over this key issue throughout the remainder of this proceeding”</i>.</p> <p>Shortly thereafter, in Opening Comments on the WG Report, UCAN cautioned that <i>“[t]he timing of seeking FERC approval in relation to the timeline of complying with CEC LMS requirements is unclear...”</i>, and that there was <i>“a lack of clarity in the WG Report and divergent</i></p>	<p>See Track B, Working Group 1, July 21, 2023, at minute 51:00 to 52:23 of the recording (contact Energy Division for recordings) and see the Working Group Report at 48-53 and 103-110, and see DFOIR Workshop (Part 3 Recording), October 17, 2023, discussion at 1:36:54 to 1:42:29 and at 1:46:17 to 1:54:37.</p> <p>Found on CPUC website at: https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-costs/demand-response-dr/demand-flexibility-rulemaking under “Background Workshops and Working Group Materials.”</p> <p>See UCAN Final Comments on the August 15, 2023 Administrative Law Judge’s Ruling on Track B Proposal to Expand Existing Pilots (filed October 25, 2023), at 5.</p>	<p>proceeding to these aspects of the decision.</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p><i>process assumptions in the LMS Compliance Plans for PG&E and SCE that warrant the Commission’s attention and direction to mitigate.”</i> Citing to each utility’s CEC LMS Compliance Plans, UCAN provided additional detail regarding the different DF rate application approval processes planned by PG&E and SCE. UCAN objected to PG&E’s intent to submit retail transmission rate designs to FERC directly (instead of to the Commission first) and recommended that the Commission oversee the process of designing and incorporating transmission components into DF rates.</p> <p>In Reply Comments, UCAN noted that SDG&E had also clarified their intent follow PG&E’s proposed process of <i>“[filing] applications for approval of an hourly marginal cost transmission rate directly with FERC.”</i> UCAN reiterated its recommendation that the Commission exercise oversight over retail transmission rate design <i>“in response to SDG&E’s intent to also file an application with FERC directly.”</i></p> <p>A ruling was subsequently issued on directing each utility to respond separately to clarify <i>“[w]hen and in what procedural venue does each IOU propose to submit its application for marginal cost-based rates?”</i></p> <p>The Decision cited to the Joint IOU Comments filed in response</p>	<p>See Comments of the Utility Consumers’ Action Network (UCAN) on Phase 1 Track B Working Group Proposals (filed November 13, 2023) at 4 to 6, 8 and 10.</p> <p>See Reply Comments of the Utility Consumers’ Action Network (UCAN) on Phase 1 Track B Working Group Proposals (filed December 22, 2023) at 3 and 4.</p> <p>See Administrative Law Judge’s Ruling on Track B Working Group 1 Proposals and Issue 5, (issued April 24, 2024), Attachment A, Section 3 (“Compliance with CEC LMS Deadlines for Marginal Cost Hourly Rates”), Question 8.</p>	

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>to the April 24, 2024, ruling, and provided clarifying directions to each utility regarding procedural processes and timelines to submit applications for LMS-compliant DF rates, including the requirement that utilities disclose their intended retail transmission rate designs.</p> <p>UCAN also identified that SDG&E had failed to fully respond to the ALJ’s April 24, 2024, Ruling, Question 8, regarding the procedural venues and timing the utility intended to propose LMS-compliant DF rates, and clarified that the utility did not intend to meet LMS implementation deadlines. UCAN provided relevant excerpts from SDG&E’s CEC LMS Compliance Plan regarding its intent to delay proposing LMS-compliant transmission rates to FERC, cited to LMS tariff requirements (Cal. Code Regs. tit. 20 § 1623)</p>	<p>D.24-01-032 at 14-15, incld. fn 14, 15 and 17, COL 1 and 17.</p> <p>“In response to the April 24 Ruling, the Large IOUs identified when and in what procedural venue they planned to file applications.”</p> <p>“The Large IOUs should describe a plan to design MTCC [hourly transmission] price components that will be incorporated in their respective DF Rate Proposals.”</p> <p>“It is reasonable to (a) direct SDG&E to file a consolidated application for DF Rate Proposals to comply with the guidance in this decision for all customer classes, (b) direct PG&E to serve supplemental testimony in A.24-09-014 to comply with the guidance for DF Rate Proposals in this decision within 60 days of the issuance of this decision, and (c) direct SCE to serve supplemental testimony in A.24-12-008 to comply with the guidance for DF Rate Proposals in this decision within 60 days of the issuance of this decision.”</p> <p>See Reply Comments of the Utility Consumers’ Action Network (UCAN) to ALJ Ruling on Track B Working Group 1 Proposals and Issue 5 (filed June 13, 2024) at 3 to 5.</p>	

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>requiring inclusion of “<i>the marginal capacity cost of ... transmission</i>” varying at a time interval of “<i>no more than one hour</i>”, and warned the Commission that the DF rate SDG&E intended to propose to the Commission “<i>will not be an LMS-compliant rate.</i>”</p> <p>Over a year later, in opening comments on the Proposed Decision, SDG&E validated the concerns previously identified by UCAN. The utility asserted that because the utility’s “<i>most-recent</i>” LMS Compliance Plan approved by the CEC proposed to apply to FERC for Time-of-Use (TOU) transmission rates, “<i>even with a non-hourly, time-varying transmission rate, SDG&E will be LMS compliant</i>” and that “<i>[a]ccordingly, SDG&E seeks modification of the PD to require that SDG&E instead propose a plan for TOU [transmission rate] as a first step, while studies are being conducted on a potential hourly [transmission rate].</i>” Relatedly, the utility asserted that “<i>...FERC has exclusive jurisdiction over setting transmission rates...</i>” and requested that the Proposed Decision be modified to “<i>[s]pecify that the Commission does not have the authority to require SDG&E to file a transmission rate design at FERC, and allow SDG&E flexibility to allow for interim, time-varying transmission proposals while transmission cost studies are being conducted.</i>”</p> <p>UCAN replied in opposition to</p>	<p>See Comments of San Diego Gas & Electric Company (U 902 E) on Proposed Decision Adopting Guidelines on Demand Flexibility Rate Design Proposals (filed August 14, 2025), at 2 and 6, and Attachment A at A-2 (proposed amendments to p. 60), A-3 (proposed FOF 5 and 6), and A-4 (proposed amendments to COL 16).</p>	

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>SDG&E, analyzing and rebutting each of the utility’s relevant assertions. Notably, regarding SDG&E’s representation that “...FERC has exclusive jurisdiction over setting transmission rates...”, UCAN explained that “FERC’s jurisdiction pertains to setting wholesale transmission rates, which determine the costs required to be eventually recovered from retail customers, and FERC itself has recently clarified that states retain jurisdiction over retail rate design to recover FERC-authorized [transmission costs]”. UCAN provided a relevant excerpt from the FERC Order and concluded by recommending that the “PD’s requirement that SDG&E submit a proposal to implement DF rates inclusive of hourly marginal cost of transmission components” be left unchanged.</p> <p>The Final Decision did not adopt SDG&E’s proposed modifications re: transmission issues and instead maintained the requirement that all utilities include an hourly transmission component in DF rates, as UCAN had recommended.</p> <p>UCAN believes that its WG contributions and comments contributed to the record, as shown above, to help the Commission resolve issues related to inclusion of hourly transmission components in LMS-compliant DF rates.</p> <p><i>Note that page 66 of the Final</i></p>	<p>See Reply Comments of the Utility Consumers’ Action Network (UCAN) on the Proposed Decision Issued July 25, 2025, Adopting Guidelines for the Joint IOUs Demand Flexibility Rate Design Proposals (filed August 19, 2025) at 1 to 4, incl. fn 7, citing to 190 FERC ¶ 61,115, Federal Energy Regulatory Commission (February 20, 2025), at 36: “First and foremost, states retain exclusive jurisdiction over... the rate designs that determine how the costs of ... transmission... are allocated among... retail customers.”</p> <p>D.24-01-032 at 66 and COL 16. “It is reasonable to require the Large IOUs to include an hourly transmission capacity price component in DF Rate Proposals.”</p>	

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p><i>Decision mistakenly characterizes UCAN’s position as supporting TOU transmission rates, rather than hourly transmission rates; UCAN provided clarifying comments and citations confirming its position.</i></p>	<p>See Opening Comments of the Utility Consumers’ Action Network (UCAN) on the Proposed Decision Issued July 25, 2025, Adopting Guidelines for the Joint IOUs Demand Flexibility Rate Design Proposals (filed August 14, 2025) at 1 to 3.</p>	

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?</p>	<p>Yes</p>	<p>Verified</p>
<p>b. Were there other parties to the proceeding with positions similar to yours?</p>	<p>Yes</p>	<p>Verified</p>
<p>c. If so, provide name of other parties:</p> <p>Expanding Pilots decision:</p> <p>1) <u>Extend and Expand pilots</u>: UCAN, CalCCA, MRC, Polaris, SBUA, TeMix, 350 Bay Area.</p> <p>2) <u>Oppose PGE/Joint Parties expanded pilot budget</u>: UCAN, CalAdv., CEJA, CforAT.</p> <p>3) <u>Oppose SCE budget proposal</u>: UCAN, CalAdv., CEJA, CforAT.</p> <p>Demand Flexibility Rate Design Proposal Guidance decision:</p> <p>1) <u>Oppose Joint IOU’s request to establish two-way balancing accounts</u>: UCAN, CalCCA</p> <p>2) <u>Support hourly transmission rate component for demand flexibility rates</u>: UCAN, 350 Bay Area</p>		<p>Noted</p>
<p>d. Intervenor’s claim of non-duplication:</p> <p>UCAN and many other intervenors filed multiple rounds of comments and reply comments to ensure the Commission had a robust evidentiary record to review as it made decisions on many important issues regarding reliability and advancing</p>		<p>Noted</p>

<p>demand flexibility rates in California. While it is nearly impossible to avoid duplication altogether, UCAN succeeded in raising some unique analysis and recommendations for the Commission to consider. For example:</p> <p>(1) During the Working Group process, UCAN was the only party to research and respond to answer ED staff’s request to identify other states that had implemented hourly retail transmission pricing.</p> <p>(2) UCAN identified the need to better understand the utilities’ divergent approaches to submitting LMS-compliant DF rate proposals to the Commission and FERC; ED Staff thanked UCAN and recognized the need to investigate this issue, which UCAN also elevated to the Commission’s attention in three sequential filings. Subsequently, a ruling requesting clarification was issued, promulgating filings by each utility that were ultimately cited to and substantially formed the evidentiary record for Section 3 of D.25-08-049 (“<i>Process for Compliance with California Energy Commission Load Management Standards</i>”).</p> <p>(3) UCAN was also the only party to identify that SCE intended to ask the CEC for a nearly ten year long delay in implementing LMS compliant rates subsequent to the Commission’s approval of the SCE Dynamic Rates Pilot, which UCAN objected to, and which D.24-01-032 addressed directly by citing to and agreeing with UCAN.</p> <p>(4) UCAN was the only party to respond to and rebut SDG&E’s opening comments on the proposed decision on demand flexibility rates, in which the utility made various inaccurate assertions, notably including that the Commission lacked jurisdictional authority to require the utility to include hourly retail transmission rates as a component of LMS-compliant DF rate applications, and recommended various changes on that basis. UCAN successfully (and uniquely) defeated the utility’s various arguments, including by pointing out in PD Reply Comments that a recent FERC ruling clarified that while FERC does have exclusive jurisdiction over setting wholesale transmission rates (which determine overall transmission revenue requirements), it is the states that retain exclusive jurisdiction over the terms of retail sales including the rate designs that determine how the costs of the FERC-authorized transmission costs are allocated for recovery among customers via retail rates. The Commission subsequently declined to adopt SDG&E’s recommended changes in D.25-08-049.</p> <p>UCAN successfully made unique contributions to further the evidentiary record for the Commission to review. UCAN asks that the Commission find any duplication of effort minor and therefore reasonable.</p>	
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PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
<p>a. Intervenor’s claim of cost reasonableness:</p> <p>UCAN seeks a total compensation award of \$22,561.60 in D.24-01-032 (Expanding Pilots) and \$72,005.40 in D.25-08-049 (Demand Flexibility Rates - WG Report) as the reasonable cost of its participation. The work in these two decisions often intertwined as shown above in Part II.A (Substantial</p>	<p>Noted</p>

	CPUC Discussion
<p>Contribution). This amount includes time for UCAN’s representative, expert and support staff. UCAN urges the Commission to find these costs reasonable in light of its substantial contribution to the decision detailed in Part II.A above.</p> <p>For example, in the expanding pilots decision, UCAN argued against the PGE/Joint Parties and SCE budget proposals and instead recommended aligning with the Staff Proposal recommendation (for a \$3 million dollar budget for both of the expanded pilots in the PGE service territory, and \$1.25 million for SCE’s pilot), while allowing for advice letters to propose changes to pilots to avoid “hard coding” requirements. The Commission ultimately approved an upfront budget of \$19 million for all three pilots, with an additional ~\$35 million authorized contingent upon achieving increasing levels of customer enrollment, while allowing PG&E and SCE to propose modifications to pilot implementation plans via advice letters as needed to ensure that minimum enrollment levels would be met before the pilots concluded. While the Commission allowed up to \$55 million for the three pilots, this was far less than the combined \$77 million requested by PGE/Joint Parties and SCE. UCAN’s concerns regarding ratepayer impacts were recognized in the final decision and the Commission approved much lower budgets than requested, thus saving ratepayers millions of dollars. Lastly, the decision cited to and agreed with UCAN in disallowing SCE’s proposed line items for research and business use case development of advanced software products for large commercial and industrial customers that would otherwise have been charged to ratepayers.</p> <p>Similarly, throughout the Working Group process and in the demand flexibility rate decision, UCAN successfully argued to include the development of hourly transmission capacity price components in any IOU demand flexibility rate proposals (see Comments on PD filed Aug. 14, 2025 for PD Corrections on this matter). UCAN also clarified FERC jurisdictional issues regarding the Commission’s authority to oversee the design of retail transmission rates, rebutting SDG&E’s assertions and recommended changes to the PD (which were not adopted by the Commission in the Final Decision; see Reply Comments on PD filed Aug. 19, 2025, for definitive FERC regulation and language on this issue). In this way, UCAN preserved future opportunities for ratepayer savings by providing a more accurate price signal that promotes economically efficient load shifting, a stated goal of this proceeding.</p> <p>For these and other reasons described in Part II.A above, UCAN believes its overall cost of participation is reasonable in relation to the impact it made on actual and potential ratepayer savings.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>UCAN is claiming 117.00 hours for representative Jane Krikorian and 145.17 hours for expert Samuel Golding. The majority of these hours are for substantive work examining important issues related to the expansion of demand flexibility pilots and crafting recommendations for guidance on demand flexibility rate applications from the IOUs. UCAN’s recommendations reflected concerns for ratepayer savings which were realized when the Commission adopted UCAN’s</p>	<p>Noted</p>

	CPUC Discussion
<p>positions in the two final decisions as noted above in Part II.A.</p> <p>As described in the final demand flexibility rate decision at p. 8, the Scoping Memo directed the Commission’s Energy Division staff to create and facilitate two working groups (WG1 and WG2) to address Track B, Scoping Items 3 and 4, with a kick-off meeting on Dec. 9, 2022. The WGs met from Jan-Aug 2023. UCAN representative Jane Krikorian attended the majority of these meetings in order to monitor the proceeding procedurally and flag issues for UCAN expert Samuel Golding. Mr. Golding attended certain WG meetings in order to analyze proposals from the Joint IOUs, Microgrid RC and Energy Division Staff and provide substantial comments. The hours invested in the WG meetings allowed UCAN to develop and contribute important observations and recommendations throughout the proceeding.</p> <p>UCAN fully participated in the working group process. This included several discussions on key issues initiated by UCAN expert Samuel Golding during WG meetings. UCAN filed informal comments to SharePoint on Aug. 25, 2023, on WG1 and WG2 proposals. The final Track B WG Report filed with the Commission on Oct. 11, 2023, included multiple references to UCAN’s comments and recommendations, which resulted in a proposal summary table clarification (regarding inclusion of transmission pricing in the ED / TeMix proposal) in the Final Report.</p> <p>UCAN subsequently filed opening, reply, and final comments to the ALJ’s ruling on Track B proposals to expand existing pilots, on Sept. 25, Oct. 9, and Oct. 25, 2023, respectively. Several of UCAN’s recommendations were incorporated into D.24-01-032, resulting in lowering and disallowing specific costs in pilot budgets, while providing utilities flexibility to amend pilot implementation plans via an advice letter process, and clarifying that utility obligations to implement DF rates by LMS deadlines are not dependent on pilot timelines or assessment of pilot results.</p> <p>UCAN also responded on Oct. 13, 2023 to a data request from SDG&E regarding UCAN’s comments included in the WG Report, and filed opening and reply comments on the Track B WG Report on Nov. 13, 2023 and Dec. 22, 2023.</p> <p>An additional ALJ Ruling was issued April 24, 2024 requesting party comments on Track B WG1 Proposals and Scoping Issue 5. The ruling included direction to each utility to clarify its proposed procedural venue and timeline to propose LMS-compliant DF rates, the need for which UCAN had previously identified at the WG meeting on Oct.17, 2023, and elevated to the Commission’s attention in final comments on proposed pilots as well as in opening and reply comments on the Track B WG Report. UCAN responded with reply comments on June 13, 2024 (with a motion to accept late-filed comments later accepted by ALJ Mutialu per email 9/18/24).</p> <p>Finally, UCAN filed opening and reply comments on the DF rate design PD on Aug. 14 and Aug. 19, 2025, respectively. As noted above, UCAN’s focus on</p>	

			CPUC Discussion																					
<p>inclusion of hourly transmission components in DF rates and clarifications to the FERC and Commission process and timelines required for utilities to propose DF rates contributed to the record development that ultimately informed D.25-08-049, and UCAN’s rebuttal of SDG&E’s comments on and proposed changes to the PD — which were not adopted by the Commission — provided timely clarification regarding FERC jurisdictional matters and the Commission’s authority over the design of retail transmission rates.</p> <p>UCAN’s hours of participation, activities and filings helped better inform all stakeholders as well as the Commission on important issues that were developed and refined through the working group process. As described in Part II.A above, UCAN’s work was recognized in the Working Group Report, and UCAN’s recommendations resulted in savings for ratepayers in D.24-01-032 (Expanding Pilots) and a more accurate price signal in D.25-08-049 (DF Rate Design) allowing for more efficient and economical load shifting opportunities for ratepayers.</p> <p>All of UCAN’s participation and hours were necessary to provide meaningful and substantial contributions in both decisions. For all of the reasons described above, UCAN urges the Commission to find UCAN’s hours reasonable.</p> <p>Additionally, UCAN urges the Commission to find all Intervenor Compensation hours reasonable. The record of these proceedings included nearly three years of work and multiple rounds of filings, both informal and formal, conversations and emails with Energy Division Staff as well as IOU representatives, and a review of recordings from the Working Group meetings. The extensiveness of this work over a three year period required additional research to identify and include all of UCAN’s substantial contributions. UCAN therefore asks that the IC hours be recognized as reasonable and fully compensated.</p>																								
<p>c. Allocation of hours by issue:</p> <table border="1"> <tbody> <tr> <td>Admin & Procedural Tasks</td> <td>2.25</td> <td>1%</td> </tr> <tr> <td>Internal Correspondence & Analysis</td> <td>28.67</td> <td>11%</td> </tr> <tr> <td>Reviewing & Analyzing Materials</td> <td>87.25</td> <td>33%</td> </tr> <tr> <td>Participation in Meetings</td> <td>80.25</td> <td>31%</td> </tr> <tr> <td>Preparing Comments</td> <td>61.50</td> <td>23%</td> </tr> <tr> <td>Preparing Data Requests / Responses</td> <td>2.25</td> <td>1%</td> </tr> <tr> <td>Total</td> <td>262.17</td> <td>100%</td> </tr> </tbody> </table>			Admin & Procedural Tasks	2.25	1%	Internal Correspondence & Analysis	28.67	11%	Reviewing & Analyzing Materials	87.25	33%	Participation in Meetings	80.25	31%	Preparing Comments	61.50	23%	Preparing Data Requests / Responses	2.25	1%	Total	262.17	100%	Noted
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Preparing Data Requests / Responses	2.25	1%																						
Total	262.17	100%																						

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Jane Krikorian	2022	1.5	\$350	D.21-12-050	\$525.00	1.50	\$360 [1]	\$540.00
Jane Krikorian	2023	108.92	\$360	D.25-08-048	\$39,211.20	54.46 [4]	\$375 [1]	\$20,422.50
Jane Krikorian	2024	5.25	\$375	D.25-08-048	\$1,965.00	2.625 [4]	\$390 [1]	\$1,023.75
Jane Krikorian	2025	1.34	\$545	See Comment 1	\$730.30	0.67 [4]	\$520 [2]	\$348.40
Samuel Golding	2023	117.25	\$355	D.25-08-048	\$41,623.75	58.465 [4,5]	\$355 [3,6]	\$20,755.08
Samuel Golding	2024	15.93	\$370	D.25-08-048	\$5,857.10	7.965 [4]	\$370 [3,6]	\$2,947.05
Samuel Golding	2025	12.09	\$385	See Comment 2	\$4,654.65	6.045 [4]	\$385 [3,6]	\$2,327.33
Subtotal: \$94,567.00						Subtotal \$48,364.11		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Jane Krikorian	2025	12	\$272.50	See Comment 1	\$3,270.00	6.00 [7]	\$260 [2]	\$1,560.00
Samuel Golding	2025	7.92	\$192.50	See Comment 2	\$1,524.60	3.96 [7]	\$192.50 [3,6]	\$762.30
Subtotal: \$4,794.60						Subtotal: \$2,322.30		
TOTAL REQUEST: \$99,361.60						TOTAL AWARD: \$50,686.41		
<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>								

CLAIMED			CPUC AWARD
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ²	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Jane Krikorian	January 3, 2025	359865	No

C. Attachments Documenting Specific Claim and Comments on Part III³:

Attachment or Comment #	Description/Comment
1	Certificate of Service
Comment 1 Rate Request for Jane Krikorian	<p><u>Request for 2025 Hourly Rate Pursuant to Resolution ALJ-393</u></p> <p>UCAN Representative: Jane Krikorian Labor Role: Legal – Attorney Level: III (5-10 yrs experience) 2025 Hourly Rate Range (estimated): \$379 - \$589 Requested Hourly Rate: \$545 Current Resume: <i>See Attachment E</i></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</p>

² This information may be obtained through the State Bar of California’s website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

³ Attachments not included in the final Decision.

Attachment or Comment #	Description/Comment
	<p>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 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. (Current 2025 rates are not yet published on the Commission website so her 2025 rate in the Public Policy Analyst category with COLA’s is estimated at between \$415 and \$435). 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>Comment 2 Samuel Golding (Expert) COLA Increase Request</p>	<p>UCAN requests the following rate adjustments for Mr. Golding to incorporate the appropriate COLA increases. D.25-08-048 set a 2024 rate of \$370 for Mr. Golding based on the Market Rate Study Hourly Rate Chart. Based off the Chart’s yearly COLA increases UCAN requests the following rates for Mr. Golding: 2025: $\\$355 \times 3.46\% = \\382.80(rounded to the nearest \$5=\$385)</p>

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
<p>[1] Jane Krikorian 2022, 2023, 2024 Hourly Rates</p>	<p>UCAN requests an hourly rate of \$350 for work conducted by Jane Krikorian based on D.21-12-050 in 2022. Upon reviewing D.21-12-050, the hourly rate of \$350 was approved for 2021. D.25-02-024 established a 2022 rate of \$360 for Jane Krikorian therefore we adopt this approved rate for Jane Krikorian.</p> <p>UCAN requests an hourly rate of \$360 for work conducted by Jane Krikorian based on D.25-08-048 in 2023. Upon reviewing D.25-08-048, the hourly rate of \$360 was approved for 2022. D.25-08-048 established a 2023 rate of \$375 for Jane Krikorian therefore we adopt this approved rate for Jane Krikorian.</p> <p>UCAN requests an hourly rate of \$375 for work conducted by Jane Krikorian based</p>

Item	Reason
	<p>on D.25-08-048 in 2024. Upon reviewing D.25-08-048, the hourly rate of \$375 was approved for 2023. D.25-08-048 established a 2024 rate of \$390 for Jane Krikorian therefore we adopt this approved rate for Jane Krikorian.</p>
<p>[2] Jane Krikorian 2025 Hourly Rate</p>	<p>UCAN requests a new 2025 rate for Jane Krikorian in the Attorney category based on her recent admittance to the California Bar in January 2025. While Jane Krikorian received her Juris Doctorate (J.D.) in 2010, she was not licensed with any bar in the United States until 2025. Resolution ALJ- 393 modified the definition of labor roles for Legal Directors and Attorneys to include “licensing by any jurisdiction within the United States.”</p> <p>UCAN requests a rate of \$545 as Legal – Attorney – III; however, we find a role of Legal – Legal Director – III to better align with Jane Krikorian’s role at UCAN. The labor role is identified as a person who oversees the legal work of the organization, including providing strategic direction, responsible for coordinating and supervising a legal team, oversees all legal operations including case assignment, hiring, supervision and professional development of the legal staff, budgeting, and participates in the most complex legal actions. According to the hourly rate chart implemented by Res. ALJ-393, the 2025 rate range for Legal Director III (5-10 years) is \$482.55 to \$758.95. Based on Krikorian’s experience, we approve a rate of \$520 for Jane Krikorian as it acknowledges her 9+ years of Legal Director experience and her recent admittance to the bar. As Intervenor Compensation Claim Preparation hours are compensated at ½ preparer’s normal hourly rate, we apply the rate of \$260 for Jane Krikorian.</p>
<p>[3] Samuel Golding 2023, 2024 & 2025 Hourly Rates</p>	<p>Upon further review, the Commission has determined that Samuel Golding is a consultant. Pursuant to Commission policy, the rate requested by an intervenor must not exceed the rate billed to that intervenor by any outside consultant it hires, even if the consultant’s billed rate is below the floor for a given experience level⁴. Per the IComp Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§ 1804(d)).</p> <p>UCAN has confirmed that per the terms of their contract, Samuel Golding has been hired on a contingency rate basis, meaning that Samuel Golding has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on Samuel Golding’s experience as an Expert - Energy & Resources Expert - V.</p> <p>Given the 2023 Energy & Resources Expert - V rate range is \$188.14 to \$376.26 with a median of \$260.50, we find the 2023 hourly rate of \$355.00 to be reasonable and we apply it here.</p> <p>Given the 2024 Energy & Resources Expert - V rate range is \$198.74 to \$386.86 with a median of \$271.10, we find the 2024 hourly rate of \$370.00 to be reasonable and we apply it here.</p> <p>Given the 2025 Energy & Resources Expert - V rate range is \$208.12 to \$396.24</p>

⁴ D.07-01-009, D.08-04-010, and Resolution ALJ-235

Item	Reason															
	<p>with a median of \$280.48, we find the 2025 hourly rate of \$385.00 to be reasonable and we apply it here. IComp preparation is billed at 50%, therefore the basis of rate is \$192.50 an hour.</p> <p>The award determined herein for Samuel Golding’s contribution in this proceeding shall be paid in full to Samuel Golding and no portion of this part of the award shall be kept by UCAN. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission’s policy on consultant compensation, and the understanding that the consultant has not billed or collected compensation for the work performed until the final award is given.</p>															
<p>[4] Reduction of Hours – Internal Duplication</p>	<p><i>Excessive Hours - Internal Duplication</i></p> <p>A review of UCAN’s timesheets for work related to D.24-01-032 and D.25-08-049 reveals that a decent portion of the hours claimed by Jane Krikorian and Samuel Golding were spent on internal coordination. The timesheets document numerous emails, phone calls, and internal discussions between staff regarding the same subject matter, often on the same day, without a clear demonstration that such coordination produced unique or substantive work product.</p> <p>While attendance at working group meetings and other Commission events may appear appropriate, the timesheets reflect repeated internal reviews of each other’s materials and frequent communications to discuss issues already addressed in prior exchanges. Under the Intervenor Compensation Program’s standard of efficient participation, time spent on internal coordination is compensable only to the extent that it results in distinct contributions to the proceeding. Routine updates, repetitive reviews, or ongoing internal discussions of the same topics do not meet this standard.</p> <p>UCAN is reminded that the Commission awards compensation for efficient efforts that contribute to proceeding outcomes, and that UCAN’s work should be sufficiently streamlined to prevent an excess of hours claimed. In the past, the Commission has disallowed inefficient activities and applied reductions to intervenor hours that reflect excessive internal duplicative efforts, such as “numerous internal communications, review of each other’s documents, working on the same materials, engaging in the same tasks and participating in the same events.” (See D.12-03-024 at 24-25).</p> <p>Accordingly, based on the excessive hours claimed for internal coordination that did not produce distinct or substantive contributions to the record, we apply a 50% reduction to the total hours claimed by Jane Krikorian and Samuel Golding for 2023, 2024, and 2025.</p> <table border="1" data-bbox="461 1705 1377 1864"> <thead> <tr> <th>Name</th> <th>Year</th> <th>Hours Requested</th> <th>Hours Disallowed</th> <th>Hours Awarded</th> </tr> </thead> <tbody> <tr> <td>Krikorian</td> <td>2023</td> <td>108.92</td> <td>54.46</td> <td>54.46</td> </tr> <tr> <td>Krikorian</td> <td>2024</td> <td>5.25</td> <td>2.625</td> <td>2.625</td> </tr> </tbody> </table>	Name	Year	Hours Requested	Hours Disallowed	Hours Awarded	Krikorian	2023	108.92	54.46	54.46	Krikorian	2024	5.25	2.625	2.625
Name	Year	Hours Requested	Hours Disallowed	Hours Awarded												
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Item	Reason																				
	<table border="1"> <tr> <td data-bbox="459 264 659 306">Krikorian</td> <td data-bbox="659 264 802 306">2025</td> <td data-bbox="802 264 1005 306">1.34</td> <td data-bbox="1005 264 1196 306">0.67</td> <td data-bbox="1196 264 1373 306">0.67</td> </tr> <tr> <td data-bbox="459 306 659 348">Golding</td> <td data-bbox="659 306 802 348">2023</td> <td data-bbox="802 306 1005 348">117.25</td> <td data-bbox="1005 306 1196 348">58.625</td> <td data-bbox="1196 306 1373 348">58.625</td> </tr> <tr> <td data-bbox="459 348 659 390">Golding</td> <td data-bbox="659 348 802 390">2024</td> <td data-bbox="802 348 1005 390">15.93</td> <td data-bbox="1005 348 1196 390">7.965</td> <td data-bbox="1196 348 1373 390">7.965</td> </tr> <tr> <td data-bbox="459 390 659 432">Golding</td> <td data-bbox="659 390 802 432">2025</td> <td data-bbox="802 390 1005 432">12.09</td> <td data-bbox="1005 390 1196 432">6.045</td> <td data-bbox="1196 390 1373 432">6.045</td> </tr> </table>	Krikorian	2025	1.34	0.67	0.67	Golding	2023	117.25	58.625	58.625	Golding	2024	15.93	7.965	7.965	Golding	2025	12.09	6.045	6.045
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<p>[5] Reduction of hours for Samuel Golding in 2023</p>	<p><i>Administrative and Clerical Work</i></p> <p>The Commission does not compensate attorneys for time spent on clerical or administrative tasks, as such work is considered subsumed within professional fees. Administrative tasks typically include scheduling, communications with the Commission’s Docket Office regarding filing procedures, overseeing administrative staff, photocopying, scanning, and other similar clerical activities. (<i>See D.11-07-024 at p. 18.</i>) In line with this policy, we reduce 0.16 hours for time associated with the following entries:</p> <table border="1"> <thead> <tr> <th data-bbox="415 785 605 827">Date</th> <th data-bbox="605 785 1118 827">Task</th> <th data-bbox="1118 785 1273 827">Total</th> </tr> </thead> <tbody> <tr> <td data-bbox="415 827 605 961">10/25/2023</td> <td data-bbox="605 827 1118 961">Email to ED Staff & CalCCA noting omission of CalCCA workshop slides from service list distribution and requesting slides for distribution</td> <td data-bbox="1118 827 1273 961">0.08</td> </tr> <tr> <td data-bbox="415 961 605 1031">10/31/2023</td> <td data-bbox="605 961 1118 1031">Email to ED staff reminding them to disseminate CalCCA slides to service list</td> <td data-bbox="1118 961 1273 1031">0.08</td> </tr> </tbody> </table> <p>The sum of Samuel Golding’s total reduction is 58.785 hours in 2023, awarding Samuel Golding a total of 58.465 hours in 2023</p>	Date	Task	Total	10/25/2023	Email to ED Staff & CalCCA noting omission of CalCCA workshop slides from service list distribution and requesting slides for distribution	0.08	10/31/2023	Email to ED staff reminding them to disseminate CalCCA slides to service list	0.08											
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<p>[6] Intervenor Responsibility for Transparency and Accuracy in Compensation Requests</p>	<p>The Commission takes this opportunity to remind all intervenors that they bear the burden of providing accurate, complete, and honest information in all compensation requests. The Commission relies on intervenors' good faith representations, particularly regarding consultant agreements and payments, as it does not have the resources to review every contract or non-standard arrangement in detail.</p> <p>Intervenor compensation is funded by ratepayers, and the Commission takes seriously any effort to mislead or obscure the financial basis for a claim. Although no violation of Rule 1.1 has been found in this instance, we remind intervenors that under Rule 1.1, intent to deceive is not required for a violation, misstatements may still be actionable. Dishonest or misleading claims not only risk denial of compensation but may also subject the intervenor to penalties.</p> <p>The Commission has clear authority to audit intervenors' books and records to verify the basis for any award. Intervenor must therefore ensure full transparency regarding actual time spent on issues, consultant fees, payment arrangements, and the actual disbursement of funds. Failure to meet this obligation undermines the integrity of the compensation process and may lead to denial of claims or further enforcement action.</p>																				
<p>[7] Excessive</p>	<p>UCAN claimed a total of 19.92 hours in 2025 for preparation of the intervenor compensation request. While the claim was detailed and generally compliant with</p>																				

Item	Reason
Icomp Claim Prep Hours	<p>Commission requirements, we find the preparation hours excessive given the scope of issues and overall scale of the request.</p> <p>UCAN has significant experience practicing before the Commission and preparing similar claims, and we would expect greater efficiency in compiling this request.</p> <p>Accordingly, we reduce the claimed hours by 50%, awarding 6.00 hours to Jane Krikorian and 3.96 hours to Samuel Golding for claim preparation in 2025. This adjustment better reflects the complexity and scale of the request.</p>

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?	No
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B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?	No
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If not:

Party	Comment	CPUC Discussion

FINDINGS OF FACT

1. Utility Consumer’s Action Network has made a substantial contribution to D.24-01-032, D.25-08-049.
2. The requested hourly rates for Intervenor’s representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services, and/or reflect the actual rates billed to, and paid by the intervenor, for consultant services rendered.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$50,686.41.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. Utility Consumer's Action Network is awarded \$50,686.41.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall pay Utility Consumer's Action Network their respective shares of the award, based on their California-jurisdictional electric revenues for the 2023 calendar year, to reflect the year in which the proceeding was primarily litigated. If such data are unavailable, the most recent 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 January 10, 2026, the 75th day after the filing of Utility Consumer's Action Network's request, and continuing until full payment is made.
3. The comment period for today's decision is not waived.

This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D2401032, D2508049		
Proceeding(s):	R2207005		
Author:	ALJ Carolyn Sisto		
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Utility Consumer's Action Network	October 27, 2025	\$99,361.60	\$50,686.41	N/A	See Part III D. CPUC Comments, Disallowances, and Adjustments

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Jane	Krikorian	Advocate	\$350	2022	\$360
Jane	Krikorian	Advocate	\$360	2023	\$375
Jane	Krikorian	Advocate	\$375	2024	\$390
Jane	Krikorian	Attorney	\$545	2025	\$520
Samuel	Golding	Consultant	\$355	2023	\$355
Samuel	Golding	Consultant	\$370	2024	\$370
Samuel	Golding	Consultant	\$385	2025	\$385

(END OF APPENDIX)