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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Bell Telephone Company d/b/a/ AT&T California (U1001C) for Targeted Relief from its Carrier of Last Resort Obligation and Certain Associated Tariff Obligations.

Application 23-03-003

ADMINISTRATIVE LAW JUDGE’S RULING ORDERING REFILING OF INTERVENOR COMPENSATION REQUESTS OF THE UTILITY REFORM NETWORK AND THE CENTER FOR ACCESSIBLE TECHNOLOGY

This ruling directs The Utility Reform Network (TURN) and the Center for Accessible Technology (CforAT) to refile by not later than April 17, 2026, their requests for intervenor fees and costs, including additional details, consistent with Decision (D.) 25-12-045. This ruling also provides for responses to the refiled requests to be filed and served by not later than April 24, 2026, and replies filed and served by not later than May 1, 2026.

1. Background

On March 3, 2023, Pacific Bell Telephone Company d/b/a AT&T California (AT&T) filed its application “for Targeted Relief from its Carrier of Last Resort [(COLR)] Obligation.” As ordered by the assigned Administrative Law Judge (ALJ), due to substantial incompleteness, on May 17, 2023, AT&T filed an amended application.

On April 6, 2023, CforAT and TURN filed a joint protest and the Public Utilities Commission’s Public Advocates Office (Cal Advocates) filed its protest

to the original application. On June 30, CforAT and TURN (jointly) and Cal Advocates filed protests to the amended application.

Decision 24-06-024 dismissed AT&T's Application with prejudice.

On August 23, 2024, CforAT filed an Intervenor Compensation (IComp) claim in the amount of \$105,800.00 for contributions to D.24-06-024. On September 16, 2024, AT&T filed a response, asserting that CforAT did not make a substantial contribution to D.24-06-024.¹

On July 30, 2025, the Commission issued D.25-07-031, awarding CforAT \$104,457.00 for substantial contributions to D.24-06-024, making minor reductions to CforAT's claim. On August 29, 2025, AT&T filed an application for rehearing, alleging among other arguments that the Commission erred in finding that CforAT substantially contributed to D.24-06-024.²

On August 26, 2024, TURN filed its IComp claim for \$295,597.88. On September 26, 2025, the Commission issued D.25-09-029, finding that TURN substantially contributed to D.24-06-024 and awarding TURN \$270,859.25, after making reductions for time spent on issues outside the scope of this proceeding.

¹ AT&T's Comments on Proposed Decision Granting Compensation to CforAT for Substantial Contribution to D.24-06-024, filed June 10, 2025, at 9. AT&T cites *New Cingular Wireless PCS, LLC v. Pub. Utils. Com.* (2016) 246 Cal.App.4th 784 (New Cingular Wireless I) and *New Cingular Wireless PCS, LLC v. Pub. Utils. Com.* (2018) 21 Cal.App.5th 1191 (New Cingular Wireless II) as support for its contention that CforAT had not substantially contributed to the final decision per Public Utilities Code Section 1802(j).

² AT&T, Application for Rehearing of D.25-07-031, filed August 29, 2025, at 2-12. AT&T argues that New Cingular Wireless II requires that for the Commission to find a substantial contribution and the intervenor's work to be compensable, the hours and costs must be traceable to "some 'order or decision'" to show advocacy success and a demonstrable link. AT&T contends that no such link was shown and that compensation should be denied.

On October 27, 2025, AT&T filed an application for rehearing of D.25-09-029, making similar arguments as were made in its rehearing application of D.25-07-031, regarding whether TURN substantially contributed to D.24-06-024.

In D.25-12-045, the Commission granted AT&T's rehearing applications, vacating both IComp decisions. In granting both applications for rehearing, the Commission stated the following:

"...in addition to reconsidering the reasoning in the IComp decisions and other issues that may arise on rehearing, the Commission will consider whether more specificity is necessary to demonstrate the links between the intervenors' work and the contentions, policy arguments, and recommendations adopted in D.24-06-024. As part of this exercise, we will adjust the compensation awards as necessary and issue revised compensation decisions. To aid this effort, the ALJ may issue rulings seeking additional information or conduct further proceedings as necessary. The remaining arguments raised in the applications for rehearing of D.25-07-031 and D.25-09-029 are moot with the issuance of this order."³

2. Discussion

While the Commission did not agree with AT&T's contention that TURN and CforAT made no substantive contributions to D.24-06-024, the Commission also determined that more information is needed to find that TURN and CforAT made substantial contributions to D.24-06-024.

By not later than April 17, 2026, TURN and CforAT shall each refile their request for intervenor compensation for their substantial contribution to D.24-06-024. These documents shall specify the fees and costs to which intervenors claim they are entitled for their substantial contribution to D.24-06-024. Intervenors'

³ D.25-12-045, at 5.

refiled requests for intervenor compensation, including all justification therefore, shall be consistent with D.25-12-045.

Intervenors shall:

1. Specifically (a) identify each order, decision or ruling adopted by the Commission (by document title, date, and page number) that adopted a contention or recommendation made by intervenors; and (b) shall then identify with specificity the evidence in the record that supports their claim that the order, decision or ruling adopting their contention or recommendation, again citing the evidence by document title (or event such as prehearing conference, workshop, etc.), date, and page number, if applicable. For example, if an answer to a question in the proceeding included recommendations that were adopted in a procedural ruling, intervenors shall identify the procedural ruling and the response containing the recommendation as specified above; and
2. Specifically identify all costs and fees associated with their contentions or recommendations that they claim were adopted pursuant to (1) above, including all attorneys fees, expert witness fees, clerical staff fees, and all other costs.
3. If it is not feasible to trace time and costs billed by TURN and CforAT with precision to an order, decision or ruling, intervenors shall make an effort to discount the claimed amount for that lack of precision - allocating the claimed time and cost in reasonable proportion to the amounts these intervenors claimed for the proceedings as a whole. If Intervenors present any fees and costs based on this section, intervenors shall explain why they cannot meet the standards set forth in Items (1) and (2) above, and fully justify their suggested discount.

Intervenors' refiled intervenor compensation requests shall be consistent with D.25-12-045 and this ruling, as specified in Items (1) - (3) above.

Intervenors' refiled intervenor compensation requests shall include documentation (attachments) that clearly identify all costs and fees associated

with each and every contention or recommendation that intervenors claim were adopted, consistent with Items (1) - (3) above, constituting their substantial contribution to D.24-06-024. Intervenors shall not simply refile their original intervenor compensation requests with original attachments in response to this ruling.

Parties may file responses and replies on the dates set forth below.

IT IS RULED that:

1. By not later than April 17, 2026, The Utility Reform Network and the Center for Accessible Technology each shall refile their requests for intervenor compensation for substantial contribution to Decision 24-06-024, consistent with Decision 25-12-045 and this ruling.

2. Responses to the refiled requests are due no later than April 24, 2026, and replies no later than May 1, 2026.

Dated March 16, 2026, at San Francisco, California.

/s/ THOMAS J. GLEGOLA

Thomas J. Glegola
Administrative Law Judge