



STATE OF CALIFORNIA

GAVIN NEWSOM, Governor

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

**FILED**

03/20/26

08:37 AM

A2205015

March 20, 2026

**Agenda ID #24100**  
**Ratesetting**

TO PARTIES OF RECORD IN APPLICATION 22-05-015, et al.:

This is the proposed decision of Administrative Law Judge John Larsen. 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 May 14, 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](mailto:icompcoordinator@cpuc.ca.gov).

/s/ MICHELLE COOKE

Michelle Cooke

Chief Administrative Law Judge

MLC:nd3

Attachment

Decision **PROPOSED DECISION OF ALJ LARSEN** (Mailed 3/20/2026)**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Application of Southern California Gas Company (U904G) for Authority, Among Other Things, to Update its Gas Revenue Requirement and Base Rates Effective on January 1, 2024.	Application 22-05-015
And Related Matter.	Application 22-05-016

**DECISION GRANTING COMPENSATION TO  
UTILITY CONSUMERS' ACTION NETWORK  
FOR SUBSTANTIAL CONTRIBUTION TO DECISION 24-12-074**

<b>Intervenor:</b> Utility Consumers' Action Network	<b>For contribution to Decision (D.) 24-12-074</b>
<b>Claimed:</b> \$1,943,711.74 <sup>1</sup>	<b>Awarded:</b> \$898,897.91
<b>Assigned Commissioner:</b> Darcie L. Houck	<b>Assigned ALJ:</b> John Larsen

**PART I: PROCEDURAL ISSUES**

<b>A. Brief description of Decision:</b>	<b><u>D.24-12-074:</u></b> In this decision, the Commission authorized general rate case (GRC) revenue requirements for San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas) for test year (TY) 2024 and post-test years (PTY) 2025, 2026 and 2027. UCAN is making a claim for time and substantial contributions to this decision as outlined below in Part II and explained further in Part III.
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<sup>1</sup> See footnote 14.

**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812<sup>2</sup>:**

	<b>Intervenor</b>	<b>CPUC Verification</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	July 27, 2022	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	August 26, 2022	Verified
4. Was the NOI timely filed?		Yes
<b>Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):</b>		
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
<b>Showing of “significant financial hardship” (§ 1802(h) or § 1803.1(b)):</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
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.24-12-074	Verified
14. Date of issuance of Final Order or Decision:	December 23, 2024	Verified
15. File date of compensation request:	February 21, 2025	Verified
16. Was the request for compensation timely?		Yes

<sup>2</sup> 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):**

<b>Intervenor's Claimed Contribution(s)</b>	<b>Specific References to Intervenor's Claimed Contribution(s)</b>	<b>CPUC Discussion</b>
<p><b>Sec. 5 - Affordability Customer Impacts/ Alternatives and Affordability Metrics</b></p> <p>UCAN argued that SDG&amp;E's GRC Application represented a serious affordability challenge to the Commission.</p> <p>The Commission cited to several of UCAN's arguments in the final decision.</p> <p>The Commission decided that it would "evaluate each cost request through the lens of affordability, allowing only reasonable and justified investments and costs and disallowing those that provide minimal safety and reliability benefits." UCAN's Testimony and Brief helped keep this issue front and center at the Commission.</p>	<p><b>UCAN Ex-01-E at 24, 30-34.</b></p> <p><b>UCAN Ex-02 at 5-9, 18-22.</b></p> <p><b>UCAN Opening Brief (OB), at 2-3, 22, 35, 37 and 39.</b></p> <p><b>D.24-12-074 at 31-32, and see fn's 66, 67, 68, 69 citing to UCAN's Opening Brief.</b></p> <p><b>D.24-12-074 at 40.</b></p>	<p>Verified</p>
<p><b>Sec. 8.6.3 - SoCalGas and SDG&amp;E Gas Distribution/ UCAN's Recommendation Related to Declining Gas Demand</b></p> <p>UCAN recommended a 30% reduction to SDG&amp;E's Gas Distribution total capital</p>	<p><b>UCAN Ex-01-E at 23.</b></p> <p><b>UCAN OB at 70 – 82.</b></p>	<p>Verified; however, the recommendation for a 30 percent reduction was not adopted in the final decision.</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>forecast based on declining gas demand.</p> <p>The Utilities disagreed with UCAN’s recommendation which is discussed in the Decision.</p> <p>While declining to adopt UCAN’s recommendation for a blanket 30% reduction, the Commission did reduce other categories mainly due to unsupported forecasting and other unexplained cost increases.</p> <p>UCAN’s Testimony contributed to the record and analysis of this issue and helped distinguish that declining gas demand did not proportionally reduce the necessity of maintaining the gas distribution infrastructure. Consequently, the Commission allowed some costs but at lower figures than requested by SDG&amp;E.</p>	<p><b>D.24-12-074 at 138.</b></p> <p><b>D.24-12-074 at 138-164 and see fn’s 404 and 411 citing to UCAN’s Testimony.</b></p> <p><b>D.24-12-074 at 139.</b></p> <p><b>See Findings of Fact #19 at 953 and #20(a) at 954 and see Conclusions of Law #19(a) at 1035.</b></p>	<p>Both references deny UCAN’s recommendation of a 30 percent reduction to projected declines in gas demand in SDG&amp;E’s 2024 gas distribution total capital forecast.</p>
<p><b>Sec. 17 - SDG&amp;E Clean Energy Innovations</b></p> <p>UCAN recommended denying the \$26.333 million 2024 capital cost budget for Clean Energy Innovations due to a lack of specific economic justifications for the proposed capital investments as well as issues of acquisitions that</p>	<p><b>UCAN Ex.-01-E at 12, 245-248, 279-280, 284.</b></p> <p><b>UCAN OB at 83-84, 104-105, 109.</b></p>	<p>Verified</p>

<b>Intervenor's Claimed Contribution(s)</b>	<b>Specific References to Intervenor's Claimed Contribution(s)</b>	<b>CPUC Discussion</b>
<p>would be outmoded, obsolete, and stranded within the GRC period.</p> <p>The Decision cited to UCAN's arguments.</p> <p>The Decision agreed with UCAN that SDG&amp;E's unique cost driver for Innovation Technology Development (ITD) lacked clarity and supporting evidence and declined SDG&amp;E's request for the ITD's \$5 million in O&amp;M costs.</p>	<p><b>D.24-12-074 at 332-333, and see fn's 1070, 1071, 1072, 1080 citing to UCAN Testimony and OB.</b></p> <p><b>See Section 17.1.1 Discussion D.24-12-074 at 334-338.</b></p> <p><b>D.24-12-074 at 337-338.</b></p>	
<p><b>Sec. 17.1.5 - Distributed Energy Resource (DER) Engineering Department - O&amp;M</b></p> <p>UCAN argued that SDG&amp;E's O&amp;M budget request for grid modernization, advanced interconnection, and modeling was outmoded, inconsistent with the Commission's priorities and unjustified.</p> <p>The Decision cited to UCAN's Testimony and Opening Brief.</p> <p>The Commission agreed with UCAN and other intervenors that there was no strong evidence supporting why costs should increase and authorized \$1.056 million instead of the \$2.316 million requested.</p>	<p><b>UCAN- Ex-01-E at 171-173, 213-214, 219, 221-222, 241, 248, 292-294.</b></p> <p><b>UCAN OB at 84-85, 145-146.</b></p> <p><b>D.24-12-074 at 347 and see fn's 1115, 1116 and 1117.</b></p> <p><b>D.24-12-074 at 348-349.</b></p>	Verified

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p><b>Sec. 17.2.1 - Advanced Energy Storage (20278A)</b></p> <p>UCAN recommended that the Commission deny SDG&amp;E’s funding requests for the Advanced Energy Storage (AES) project due to a lack of economic justification and properly defined scope of operation. UCAN included the hydrogen system in this recommendation (OB at 104).</p> <p>The Decision cited to UCAN’s Testimony and Opening Brief.</p> <p>The Decision allowed SDG&amp;E to complete the remaining AES project authorized in D.19-09-051 but declined cost recovery for the hydrogen energy storage system.</p>	<p><b>UCAN Ex-01-E at 284-287.</b></p> <p><b>UCAN OB at 101-105.</b></p> <p><b>D.24-12-074 at 351 and see fn’s 1129, 1130, 1131.</b></p> <p><b>D.24-12-074 at 351-352.</b></p>	<p>Verified</p>
<p><b>17.2.2 - Advanced Energy Storage (212690)</b></p> <p>UCAN recommended denying the AES 2.0 capital project due to SDG&amp;E’s lack of evidentiary support.</p> <p>The Decision cited to UCAN’s recommendation and Opening Brief.</p> <p>The Decision denied SDG&amp;E’s request for capital expenditures for AES 2.0.</p>	<p><b>UCAN Ex-01-E at 7 and 244.</b></p> <p><b>UCAN OB at 102-103.</b></p> <p><b>D.24-12-074 at 355-356 and see fn. 1146.</b></p> <p><b>D.24-12-074 at 357-358.</b></p> <p><b>See Findings of Fact #123 at 981.</b></p>	<p>Verified; however, both Cal Advocates and TURN also recommended denying the AES 2.0 capital project.</p> <p>The decision states, “The three intervenors’ collective comments suggest that SDG&amp;E has not met its burden of proof because the AES 2.0 proposal is vague, does not explain how it will achieve greater reliability</p>

<b>Intervenor's Claimed Contribution(s)</b>	<b>Specific References to Intervenor's Claimed Contribution(s)</b>	<b>CPUC Discussion</b>
		and lacks basic information about the project's location, benefits, storage technology plan, and status.”
<p><b>17.2.3 Non-Lithium-Ion Energy Storage Technology (212710)</b></p> <p>UCAN recommended denying the project and its associated cost due to SDG&amp;E's lack of economic justification.</p> <p>The Decision cited to UCAN's recommendation.</p> <p>The Decision concurred with UCAN and two other intervenors ruling that SDG&amp;E had not met its burden of proof and denied its' capital funding request.</p>	<p><b>UCAN OB at 103.</b></p> <p><b>D.24-12-074 at 359.</b></p> <p><b>D.24-12-074 at 361.</b></p> <p><b>See Findings of Fact #124 at 981.</b></p>	<p>Verified; however, Cal Advocates and TURN also recommended denying the project and its associated cost.</p>
<p><b>17.2.4 Microgrid and Controls 17246A Borrego 3.0 Microgrid</b></p> <p>UCAN argued this project was unnecessary because SDG&amp;E's primary purpose for the Borrego Springs microgrid had already been achieved.</p> <p>The Decision cited to UCAN's recommendation and Opening Brief.</p> <p>The Commission approved the requested funds for the Borrego Microgrid 3.0 Project</p>	<p><b>UCAN Ex-01-E at 252-253.</b></p> <p><b>UCAN OB at 14-16, 103-104, 147.</b></p> <p><b>D.24-12-074 at 362 and see fn. 1170.</b></p>	<p>Verified; however, Cal Advocates also opposed SDG&amp;E's request for capital expenditure for Borrego 3.0 Microgrid.</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>noting that the project’s purpose would allow SDG&amp;E to connect additional DERs and SDG&amp;E had used a federal grant to lower ratepayer costs.</p> <p>While not agreeing with UCAN or adopting UCAN’s recommendation, the Commission did use UCAN’s position to distinguish why the project was necessary and reasonable.</p>	<p><b>D.24-12-074 at 363.</b></p> <p><b>D.24-12-074 at 362-363.</b></p>	
<p><b>17.2.8 Hydrogen Projects - 212680 Hydrogen Build Ready Infrastructure</b></p> <p>UCAN opposed this project arguing it was uneconomic and speculative.</p> <p>The Decision cited to UCAN’s Testimony.</p> <p>The Commission agreed with UCAN and other intervenors that due to the high cost and uncertainty of who would benefit from this project there was no direct benefit to ratepayers. Therefore, the Commission denied funding for this project.</p>	<p><b>UCAN Ex-01-E at 288-290.</b></p> <p><b>UCAN OB at 147-148.</b></p> <p><b>D.24-12-074 at 368 and see fn. 1187 [and should say “UCAN Ex-01-E not UCAN Ex-2.]</b></p> <p><b>D.24-12-074 at 368-369.</b></p> <p><b>See Findings of Fact #129 at 982.</b></p>	<p>Verified</p>
<p><b>17.2.8.2. Hydrogen Energy Storage System Expansion (212720)</b></p> <p>The Commission cited to UCAN’s argument that</p>		<p>Verified</p>

<b>Intervenor's Claimed Contribution(s)</b>	<b>Specific References to Intervenor's Claimed Contribution(s)</b>	<b>CPUC Discussion</b>
SDG&E had no track record in developing or operating a hydrogen electrolyzer and denied funding.	<b>D.24-12-074 at 371-372 and see UCAN Ex-01-E at 289-290.</b>	
<p><b>19.1.3.2 Distribution Substation Reliability Projects</b></p> <p>The Decision cited to UCAN's Testimony that SDG&amp;E had not provided enough information and its workpapers were too deficient to warrant any funding.</p> <p>SDG&amp;E disagreed with UCAN saying "Due to the reactive nature of the program, exact project descriptions cannot be provided and are based on a 3-year historical average."</p> <p>The Commission agreed with SDG&amp;E and adopted its' funding request. Although not adopting UCAN's recommendation the Decision did use UCAN's critique and SDG&amp;E's response to show SDG&amp;E had met its burden that the forecast was reasonable. UCAN's analysis therefore contributed to the Commission's final decision on this issue.</p>	<p><b>D.24-12-074 at 422 and see fn. 1322.</b></p> <p><b>SDG&amp;E EX-211 at 36.</b></p> <p><b>D.24-12-074 at 422-423.</b></p>	Verified
<p><b>19.1.4.1 Planned Investments</b></p> <p>The Decision cited to UCAN's Testimony that SDG&amp;E's</p>		Verified

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>forecasted projects were for the 2024-2027 period and outside the 2024 Test Year and that a more accurate forecast “planning and diagnosis process... [would] arise as a result of the DDOR/LCA.”</p> <p>In rebuttal, SDG&amp;E responded at length to UCAN’s criticisms by supporting its historical costs analysis and noting that the capital funds requested were identified through the annual DPP and would be documented in the GNA reports.</p> <p>The Commission found SDG&amp;E’s forecast to be reasonable in light of legislation requiring SDG&amp;E to upgrade its electrical distribution systems to speed up customer energizations and adopted the requested costs.</p> <p>While noting both UCAN’s DDOR/LCA argument and SDG&amp;E’s response regarding the DPP/GNA process, the Commission did not discuss these processes and instead directed SDG&amp;E to report the number of Planned Investment Projects and their unit costs in the next GRC. UCAN’s recommendation and SDG&amp;E’s response helped distinguish how and where to track these projects.</p>	<p><b>D.24-12-074 at 428 and see fn. 1344 [which should say “UCAN Ex-01-E instead of UCAN Ex-2.]</b></p> <p><b>UCAN Ex-01-E at 273.</b></p> <p><b>SDG&amp;E EX-211 at 41-45.</b></p> <p><b>D.24-12-074 at 428.</b></p> <p><b>D.24-12-074 at 428-429.</b></p>	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p><b>19.1.4.2 Future Capacity Projects</b></p> <p>The Decision cited to UCAN's Testimony that developers paid a large part of these costs under line-extension rules and that SDG&amp;E failed to account for customer cost contributions.</p> <p>In rebuttal, SDG&amp;E responded at length to UCAN's criticisms and disagreed that Rule 15 even applied.</p> <p>While noting both UCAN and SDG&amp;E's arguments, the Commission did not decide if Rule 15 applied in this situation and instead found SDG&amp;E's forecast to be reasonable in light of legislation requiring SDG&amp;E to upgrade its electrical systems so that customers can be energized without substantial delay and adopted the funding request.</p>	<p><b>D.24-12-074 at 429 and see fn. 1352 [should say "UCAN Ex-01-E"]</b></p> <p><b>SDG&amp;E EX-211 at 41-45.</b></p> <p><b>D.24-12-074 at 430.</b></p>	<p>Verified</p>
<p><b>19.1.4.3 Distribution System Capacity Improvement</b></p> <p>The Decision cited to UCAN's Testimony and recommendation that funding be reduced to zero because SDG&amp;E did not provide sufficient information and economic justifications. UCAN testified that a power-flow analysis should be performed along with the</p>	<p><b>D.24-12-074 at 431 and see fn. 1360.</b></p> <p><b>UCAN Ex-01-E at 274-279.</b></p>	<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>“economics of reliability” test in order to determine economic justifications for these grid investments.</p> <p>The Commission noted that SDG&amp;E’s response to intervenors’ arguments supported the economic value of the requested investments but nonetheless used Cal Advocates recommended reduction method and reduced SDG&amp;E’s request by nearly \$1M.</p> <p>While not using UCAN’s method to reduce the request, UCAN’s Testimony was cited and aided the Commission in its final decision on this issue by providing an alternative analysis for possible use.</p>	<p><b>D.24-12-074 at 431.</b></p>	
<p><b>19.2.1 Reliability and Capacity</b></p> <p>UCAN recommended denying funding for O&amp;M labor in Reliability and Capacity.</p> <p>The Decision cited to Sempra’s Opening Brief which cites to UCAN’s Testimony and recommendation that funding be denied.</p> <p>Sempra’s OB spent several pages explaining why it disagreed with UCAN’s recommendation and analysis.</p>	<p><b>UCAN Ex-01-E at 241-242</b></p> <p><b>UCAN OB at 148</b></p> <p><b>D.24-12-074 at 448-449 and see fn. 1421 citing to Sempra OB at 386 which cites to Ex. UCAN-01-E at 241-242.</b></p> <p><b>Sempra OB at 386-389 (listed as San Diego Gas &amp; Electric, Southern California Gas Company</b></p>	<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>The Commission disagreed with the costs that UCAN questioned finding them instead to be reasonable and adopted SDG&amp;E’s Reliability and Capacity funding request. While not adopting UCAN’s position, UCAN’s Testimony aided in the analysis and discussion of this issue.</p>	<p><b>Joint Opening Brief on the Docket Card, August 14, 2023.)</b></p> <p><b>D.24-12-074 at 449.</b></p>	
<p><b>22 SDG&amp;E’s Customer Services – Field Operation O&amp;M Expenses</b></p> <p>UCAN recommended that SDG&amp;E’s Smart Meter 2.0 O&amp;M funding request as well as its request for Field Service Delivery O&amp;M funding be denied in their entirety.</p> <p>The Decision cited to UCAN’s recommendations.</p> <p>SDG&amp;E disagreed with UCAN’s recommendations and spent considerable time arguing against them.</p> <p>The Commission agreed with UCAN and other advocates that the request for additional costs lacked sufficient justification and denied funding in part for CS-Field and Smart Meter Operations (see Table 22.4 at 526).</p>	<p><b>UCAN Ex. 01-E at 5, 13-15, 89-91, 217, 280, 294-298, 300.</b></p> <p><b>UCAN OB at 6, 15, 152-176.</b></p> <p><b>D.24-12-074 at 523 and see fn. 1695.</b></p> <p><b>Sempra OB at 489-498.</b></p> <p><b>D.24-12-074 at pp. 524-526.</b></p>	<p>Verified</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p><b>25 SDG&amp;E Clean Transportation -non-shared O&amp;M Expenses</b></p> <p>UCAN argued that SDG&amp;E's proposed IT related projects - including the CT Product Team - would either be obsolete or at best "interim" – useful for two years or less.</p> <p>The Decision cited to UCAN's Testimony.</p> <p>SDG&amp;E addressed UCAN's arguments in its Opening Brief stating the Product Team designed and deployed new software applications to support its business activities.</p> <p>The Commission agreed with UCAN and other intervenors and denied O&amp;M costs for additional marketing funds and two full-time positions on the CT Product Team saying SDG&amp;E had not provided enough evidence that either of these requests were needed.</p>	<p><b>UCAN Ex-01-E at 280-281</b></p> <p><b>UCAN OB at 176</b></p> <p><b>D.24-12-074 at 559 and see fn. 1821.</b></p> <p><b>Sempra OB at 575.</b></p> <p><b>D.24-12-074 at 560-561.</b></p>	<p>Verified</p>
<p><b>29.5 SDG&amp;E IT Capital Requests</b></p> <p>UCAN recommended denying multiple IT Capital requests including Smart Meter 2.0 for a variety of reasons.</p>	<p><b>UCAN Ex-01-E at 298-300, 311-321</b></p> <p><b>UCAN Ex-02 at 14 -20.</b></p> <p><b>TR Vol. 15: at 2645-2665.</b></p> <p><b>TR Vol. 18: at 3319-3335.</b></p> <p><b>TR Vol. 23: at 4037-4042.</b></p> <p><b>UCAN OB at 152 – 176.</b></p>	<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>The Decision cited to UCAN’s arguments in its Opening Brief.</p> <p>The Decision also noted that SDG&amp;E disagreed with UCAN and argued extensively against these recommendations in its Opening Brief.</p> <p>The Decision noted evidence raised by UCAN and TURN at evidentiary hearings regarding supply-chain issues that could delay implementation of the Smart Meter 2.0 project thus contributing to its quick obsolescence.</p> <p>Citing affordability concerns and concerns about SDG&amp;E’s stewardship of ratepayer funds, the Commission agreed with UCAN that SDG&amp;E failed to provide information on cost-reduction steps. The Commission also stated that “UCAN’s comments warrant further assessment and understanding [of the Smart Meter 2.0 system] in light of potential advancements like smart inverters.”</p> <p>The Commission declined to support the Smart Meter 2.0 project and other costs due to SDG&amp;E’s failure to provide sufficient evidence.</p>	<p><b>D.24-12-074 at 666-667, 677 and see fn’s 2149 – 2155.</b></p> <p><b>D.24-12-074 at 668-671 and see fn. 2160-2175 citing to Sempra OB.</b></p> <p><b>D.24-12-074 at 672 and see fn. 2184 citing to UCAN OB at 152. Also see UCAN OB at 158 fn. 483 citing to TR Vol. 23 (Thai/Exon/SDGE) at pg. 4029, L13-18, and pg. 4047, L 14-16.</b></p> <p><b>D.24-12-074 at 674 and see fn’s 2192 and 2193.</b></p> <p><b>D.24-12-074 at 675 and see fn’s 2195 and 2196.</b></p> <p><b>D.24-12-074 at 671 – 677.</b></p>	
<p><b>29.7.2 Field Service Delivery</b></p>		<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>UCAN recommended removing all costs for Field Service Delivery (FSD).</p> <p>SDG&amp;E disagreed with UCAN’s recommendation.</p> <p>The Commission noted “both sides of [this] argument have merit...” and agreed to fund SDG&amp;E’s request for FSD but reduced by 20% due to concerns about cost reasonableness.</p>	<p><b>D.24-12-074 at 667 and see fn. 2153 citing to UCAN OB at 169; 677 and see fn. 2202 citing to UCAN OB at 162.</b></p> <p><b>D.24-12-074 at 669 and see fn. 2162 citing to Sempra OB at 496.</b></p> <p><b>D.24-12-074 at 677-678.</b></p>	
<p><b>29.7.6 Clean Energy Innovation IT costs</b></p> <p>Regarding Clean Energy Innovation IT costs, the Decision agreed with UCAN that there was insufficient evidence on how local area distribution controller (LADC) software and hardware would be deployed and denied IT related costs.</p> <p><u>NOTE:</u> While the Decision declined to accept some of UCAN’s recommended cost reductions for some capital projects (D.24-12-074 at 686, fn. 2229; Conclusion of Law 223) the Commission did accept multiple recommendations by UCAN including denying O&amp;M costs for the Clean Transportation Product Team (see Sec. 25 above) and denying O&amp;M costs for the Clean Energy Innovation Technology</p>	<p><b>UCAN Ex-01-E at 248, 292-293.</b></p> <p><b>UCAN OB at 84, 145.</b></p> <p><b>D.24-12-074 at 686.</b></p>	<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>Development (see Sec. 17 above). Also see multiple other reductions based on UCAN recommendations listed above and below.</p>		
<p><b>32.1 Compensation and Benefits – Short-Term Incentive Compensation</b></p> <p>UCAN recommended denying ratepayer funding for all of SDG&amp;E’s Incentive Compensation Programs (ICPs).</p> <p>The Decision cited to UCAN’s recommendation and its analysis.</p> <p>The Commission highlighted and discussed UCAN’s recommendation to deny authorization for ICP unless Sempra designs a plan based on employee efforts to control costs and reduce customer rates.</p> <p>The Commission agreed with UCAN that there was little evidence that any Sempra incentives provide employees with the incentive to run the company more efficiently.</p> <p>The Commission did not adopt UCAN’s recommendation for zero funding for ICPs and instead adopted Cal Advocates recommendation for reduced funding. However, the Commission did include</p>	<p><b>UCAN Ex-02 at 21-23.</b></p> <p><b>UCAN OB at 179-183.</b></p> <p><b>D.24-12-074 at 736 and see Table 32.1 at 737, 738 and see fn. 2437, 739.</b></p> <p><b>D.24-12-074 at 741.</b></p> <p><b>And see UCAN Ex.-02 at 18-20 discussing the relationship between productivity, uncontrolled spending and rate increases.</b></p> <p><b>D.24-12-074 at 741-742.</b></p> <p><b>D.24-12-074 at 741-742.</b></p>	<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>UCAN’s argument about management inefficiencies and directed Sempra to perform an independent study to be filed in the next GRC to assess their management efficiency with specific recommendations for controlling costs. UCAN’s arguments regarding affordability, productivity and management efficiencies helped the Commission make its final determination on the ICPs.</p>		
<p><b>32.3 SDG&amp;E Total Compensation</b></p> <p>UCAN provided a detailed recommendation for reducing the ratepayer contribution to employee compensation.</p> <p>The Decision discussed UCAN’s recommendation and cited to its Testimony.</p> <p>The Commission agreed with UCAN stating, “The Commission finds UCAN’s recommendation to be reasonable and adopts an additional reduction of \$2.508 million from the amount of SDG&amp;E’s ICP of \$33.287 million.”</p>	<p><b>UCAN Ex-02 at 23-25.</b></p> <p><b>TR Vol. 15: 2754-2770.</b></p> <p><b>UCAN OB at 183-184.</b></p> <p><b>D.24-12-074 at 742 and see fn. 2455 [should say UCAN Ex-02 at 24-25]</b></p> <p><b>D.24-12-074 at 743.</b></p>	<p>Verified</p>
<p><b>48.2.1 Settlement Agreement on Insurance</b></p>	<p><b>UCAN Ex-02 at 9-13.</b></p>	<p>Verified; however, the decision also cited Cal Advocates and TURN in support of or arguing</p>

<b>Intervenor's Claimed Contribution(s)</b>	<b>Specific References to Intervenor's Claimed Contribution(s)</b>	<b>CPUC Discussion</b>
<p>UCAN presented evidence in support of much lower insurance costs.</p> <p>The Decision cited to UCAN regarding its contribution to the record.</p> <p>The Decision found the Insurance Settlement Agreement reasonable in light of the whole record, consistent with the law, and in the public interest and adopted it without modification.</p>	<p><b>TR Vol. 17: at 3131-3147.</b></p> <p><b>UCAN OB at 177-179.</b></p> <p><b>D.24-12-073 at 917.</b></p> <p><b>D.24-12-073 at 911-919.</b></p>	<p>for much lower insurance costs.</p>
<p><b>51 Comments on Proposed Decision</b></p> <p>UCAN submitted detailed comments and reply comments on the proposed decision taking issue with the decision's treatment of SDG&amp;E's proposed capital investments and information technology.</p> <p>The Decision cited UCAN and other parties' comments saying, "...all comments were considered carefully. In response to comments, the proposed decision has been changed to clarify, correct inadvertent errors, maintain consistency, and update the revenue requirement."</p> <p>The Commission also responded to Sempra's Comments on the PD</p>	<p><b><i>See UCAN Comments on the PD filed November 7, 2024 and UCAN Reply Comments on the PD filed November 12, 2024.</i></b></p> <p><b>D.24-12-073 at 932-933.</b></p>	<p>Verified</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
clarifying that, "...ratepayer benefits are not a new consideration or evidentiary standard, as the cost of service to ratepayers is a fundamental aspect of the regulatory compact and in determining whether rates are just and reasonable," echoing a theme that UCAN argued throughout its filings in this GRC.	<b>D.24-12-073 at 933-934 and see rest of discussion through p. 938 regarding Commission ordered revenue reductions.</b>	

**B. Duplication of Effort (§ 1801.3(f) and § 1802.5):**

	Intervenor's Assertion	CPUC Discussion
<b>a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?</b>	Yes	Yes
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	Yes	Noted
<b>c. If so, provide name of other parties:</b>  TURN, SBUA (on Affordability issues), CEJA		Cal Advocates and EDF also shared similar arguments.
<b>d. Intervenor's claim of non-duplication:</b>  UCAN, along with many other Intervenors including Cal Advocates, CEJA, EDF, MGRA, PCF, and TURN, submitted prepared testimony in this proceeding addressing a variety and diverse number of issues. Early in the proceeding UCAN attempted to coordinate and minimize duplication by meeting and sharing concerns with attorneys and relevant experts of other parties. While it was nearly impossible to avoid duplication altogether, UCAN met with TURN and PCF to minimize duplication and to ensure that if such duplication occurred, UCAN's witnesses would conduct separate and distinct analyses and present unique arguments in support of common or overlapping recommendations. ( <i>See for example</i> timesheet entries on 7/19/2022 for UCAN Attorneys Mr. Lopez and Mr. Zeller meeting with San Diego Community Power; entries on 9/24/2022 and 11/7/2022 for Mr. Zeller		Noted

	Intervenor's Assertion	CPUC Discussion
<p>meeting with TURN and PCF respectively; entries on 5/15/23, 8/01/23 and 8/16/23 for Dr. Woychik.)</p> <p>UCAN devoted a significant level of effort arguing that SDG&amp;E's revenue request included significant amounts of investments in obsolete technology. UCAN's approach reflected its awareness that a high level of Distributed Energy Resources (DERs) are installed in SDG&amp;E's service territory. UCAN's technology proposals were based on its overall recommendation that SDG&amp;E's future capital investments should be capable of integrating customer DERs into its transmission and distribution infrastructure. The other intervenors that submitted testimony on the same cost issues relied on different logic. For example, Cal Advocates did not object to SDG&amp;E moving forward with a program to replace meters but instead argued that SDG&amp;E had not adequately justified the cost estimates for these meters (see Cal Advocates Opening Brief at 209). UCAN's position differed markedly from Cal Advocates', focusing instead on the capabilities of the meters that SDG&amp;E proposed to purchase. UCAN's testimony demonstrated the meters SDG&amp;E wanted to buy would quickly become obsolete.</p> <p>To further avoid duplication, UCAN examined the discovery responses from SDG&amp;E to gain further insight about issue focus and expected advocacy from other intervenors. (<i>See for example</i> entries on 10/24/2022 and 10/25/2022 for Mr. Lopez.) In addition, UCAN obtained information from TURN on at least four occasions on how to address smart metering and insurance issues to ensure UCAN would provide alternative and different analyses and avoid duplication. (<i>See for example</i> entry on 9/24/2022 for Mr. Zeller; entry on 3/24/2022 for Dr. Woychik; entries for Mr. Lopez on 7/11/2023 and 7/14/2023.) The result was complementary coverage on many issues but avoided duplication. UCAN believes the coordination efforts that it undertook helped ensure that the Commission had a more robust evidentiary record, one that aided its review and decisions on a multitude of complex issues.</p> <p>UCAN brought perspectives that were not addressed by other parties; for example, UCAN particularly focused on metering, as well as the use and integration of smart inverters. While other consumer intervenors and Cal Advocates presented testimony and conducted cross examination on Smart Meter 2.0 and related issues regarding cost justifications, UCAN's testimony and cross examination of SDG&amp;E's witnesses was tightly focused on the issue of technological obsolescence and the lack of functionality of SDG&amp;E's proposed Smart Meters 2.0. See for example TR Vol. 6 (Woychik/UCAN) pp. 1130-1135 and TR Vol. 10 (Woychik/UCAN)</p>		

	<b>Intervenor’s Assertion</b>	<b>CPUC Discussion</b>
<p>pp. 1749-1765 and see Part II.A above, Sec. 29.5 “SDG&amp;E IT Capital Requests” for references to UCAN’s unique contribution.</p> <p>On the issue of insurance coverage UCAN joined parties to the Settlement Agreement. UCAN’s contribution uniquely addressed and proposed that SDG&amp;E should self-fund its wildfire liability coverage. UCAN’s analysis focused on the significant investments SDG&amp;E has made in fire suppression equipment, upgraded communications and monitoring equipment, and its history of avoiding utility-caused conflagrations since 2007 despite repeated cycles of drought. The settlement agreement includes provisions for expanded self-funding of liability exposure. UCAN’s analyses and recommendations were unique to the settlement agreement on insurance issues that was incorporated into the decision.</p> <p>UCAN also addressed several critical issues that were not discussed by other parties. UCAN was the only party that challenged SDG&amp;E’s proposed compensation plan and conducted its own analysis of employees on SDG&amp;E’s payroll that were being compensated well above market levels. The decision adopted UCAN’s recommendation to limit ratepayer funding of these individuals to market levels. Due to UCAN’s efforts at non-duplication and its unique contributions to a multitude of issues that were cited in the Decision, UCAN asks that the Commission find any duplication of efforts minor and therefore reasonable.</p>		

**PART III: REASONABLENESS OF REQUESTED COMPENSATION**

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

	<b>CPUC Discussion</b>
<p><b>a. Intervenor’s claim of cost reasonableness:</b></p> <p>UCAN seeks a total compensation award of \$1,943,711.74 as the reasonable cost of its participation in this proceeding. This amount includes time for UCAN’s attorneys, consultants 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. UCAN addressed numerous issues on behalf of ratepayers to reduce the Utilities revenue requests in multiple areas. UCAN articulated positions to ensure ratepayers were not burdened with obsolete and outmoded</p>	<p>Noted</p> <p><i>See Part III.D CPUC Comments, Disallowances, and Adjustments below.</i></p>

	CPUC Discussion
<p>technologies (UCAN Ex. 01-E). UCAN also addressed Insurance and Compensation issues to reduce costs for ratepayers (UCAN Ex. 02).</p> <p>UCAN estimates that its advocacy resulted in savings for ratepayers between a high figure of \$900M to a lower figure of \$550M depending on which figure is used for the Smart Meter 2.0 total program costs. (Through a data request, TURN identified a total cost of \$641M while SDG&amp;E used a figure of \$278.874 in testimony (see D.24-12-074 at 671- 672)). Adding this figure with a \$66M in Insurance savings from the Insurance Settlement, the \$190M in all other categories that UCAN participated in and listed in Part II.A above where the Commission reduced costs, gives the range of ratepayer savings. Regardless of which savings figure is used, the cost of UCAN participation was less than half a percent of total ratepayer savings.</p> <p>While not prevailing on all of the issues, UCAN’s participation offered unique insights on advanced technology and capital investments and highlighted ratepayers’ perspectives of costs and affordability so that these concerns could be at the forefront of the Commission’s decision making when reviewing the Utilities revenue requests in this GRC. UCAN urges the Commission to find UCAN’s requested amount of compensation reasonable in light of its advocacy and the overall savings it helped achieve for ratepayers.</p>	
<p><b>b. Reasonableness of hours claimed:</b></p> <p>UCAN seeks compensation for a total of 2,615.13 hours of substantive work in this proceeding. This includes time for UCAN Executive Director and Attorney Edward Lopez, UCAN Attorney Jason Zeller who also participated in this proceeding as an in-house Witness for UCAN, and Consultant and Witness Dr. Eric Woychik of Strategy Integration, LLC, who served as the main witness for UCAN. Minimal hours are included for other staff members who assisted in the beginning to determine the course of action. The hours are for substantive work examining the revenue requests of San Diego Gas &amp; Electric and Southern California Gas (Utilities) and determining where these Utilities should reduce costs and provide savings for ratepayers. Below are further detailed explanations regarding the roles and work of Mr. Lopez, Mr. Zeller and Dr. Woychik related to the reasonableness of hours claimed in order to make a substantial contribution.</p> <p><u>UCAN Executive Director and Attorney Edward Lopez</u> - Mr. Lopez was responsible for case management and directing activities for this proceeding. He coordinated and conferred with in-house witness</p>	<p>Noted. <i>See</i> Part III.D CPUC Comments, Disallowances, and Adjustments below.</p>

	CPUC Discussion
<p>Mr. Zeller and consultant/witness Dr. Woychik to determine the high priority issues for the protection of ratepayers. Mr. Lopez was responsible for the timely filing of responses, data requests, testimony, briefs and comments. His hours also include hours of initial preparation such as reading the Utilities initial application and testimony, attending the PHC and responding to motions. Mr. Lopez was also responsible for managing efforts at the evidentiary hearings by communicating with the Commission and Utilities about cross-examination schedules, monitoring the presentation of subjects and issues related to UCAN’s testimony and advocacy efforts and following through on any ALJ directives at the hearings (schedule changes, timely filing of exhibits, necessary motions). Throughout the proceeding Mr. Lopez communicated, coordinated and reviewed most filings while making an effort not to internally duplicate work but more to ensure the integrity, veracity and consistency of all legal arguments and analytical claims.</p> <p><u>UCAN Attorney and Witness Jason Zeller</u> – Mr. Zeller is employed at UCAN as an Attorney and in this proceeding also appeared as an in-house witness. Mr. Zeller submitted testimony on behalf of UCAN on the subjects of affordability, productivity, insurance and compensation. Mr. Zeller also helped coordinate legal work including his own testimony, opening brief and reply brief, a response to the joint motion of SDG&amp;E and SoCalGas, and comments on the proposed decision. Mr. Zeller attended all the hearings to ensure UCAN’s interests were being properly represented, and to track the testimony of SDG&amp;E’s witnesses when they were being cross-examined. Mr. Zeller is UCAN’s lead attorney on compensation and insurance and as such participated in settlement negotiations regarding insurance issues. Mr. Zeller conducted detailed analyses of the Utilities filed testimony in order to understand the issues and provide recommendations for revenue reductions that resulted in savings to ratepayers in the areas of compensation and insurance and also in the areas of Utilities productivity and affordability (See Part II.A above sections 32.1, 32.3, 48.2.1, and 51.) Mr. Zeller’s qualifications and resume are in the record in his testimony exhibit UCAN-02.</p> <p><u>Dr. Eric Woychik of Strategy Integration, LLC, Consultant and Expert Witness for UCAN</u> – Dr. Woychik conducted analyses and wrote major portions of the main documents filed by UCAN in this proceeding including: testimony, opening brief and reply brief, and comments on proposed decision. Dr. Woychik has an extensive background providing economic and technical studies in support of clients involved in regulatory and legislative proceedings. UCAN relied heavily on Dr. Woychik’s expertise to examine a multitude of issues and</p>	

	CPUC Discussion
<p>recommend how and where the Utilities could reduce costs to create savings for ratepayers. These recommendations are detailed in his testimony and in UCAN’s opening brief where the bulk of Dr. Woychik’s work and hours occurred. Due to Dr. Woychik’s extensive knowledge and expertise, he attended hearings and conducted cross-examinations under the supervision and in consultation with Executive Director and Attorney Mr. Lopez and Attorney Mr. Zeller. Dr. Woychik’s qualifications and resume are in the record in his testimony exhibit UCAN-01-E.</p> <p><u>Overall Participation, Coordination, Evidentiary Hearings, Insurance Settlement and Final Results</u> – UCAN participated in this rate case with a limited amount of people but an extensive amount of relevant experience and practice before the Commission. Mr. Zeller and Dr. Woychik each have over forty years of experience in utility regulation, energy systems, ratemaking and energy markets. Mr. Lopez is a licensed attorney with more than 15 years of active practice and six years as UCAN’s Executive Director. Between them they coordinated the extremely difficult task of reviewing nearly 50 Chapters of Utilities testimony and rebuttal testimony, analyzing relevant workpapers, preparing data requests, participating at evidentiary hearings, joining settlement discussions, and making cogent and cohesive arguments on behalf of ratepayers who do not have a voice when it comes to the price of their electricity. For example, UCAN capitalized on the vast experience of Dr. Woychik to provide over 300 pages of relevant testimony analyzing issues and providing recommendations for multiple capital and O&amp;M reductions. Mr. Zeller’s extensive experience in compensations and insurance issues resulted in testimony and recommendations that further reduced the Utilities revenue requests in these areas. Mr. Zeller was successful in negotiating the Insurance Settlement adopted in the final decision. Multiple UCAN recommendations were cited in the final decision as noted in Part II.A above.</p> <p>Additionally, in order to stay on top of important issues and make a strong showing in subsequent briefing, Mr. Lopez, Mr. Zeller and Dr. Woychik remotely attended evidentiary hearings. Each participant monitored the hearings daily, carefully flagging issues for further coordination and responses either in cross-examination or briefing. While Mr. Zeller and Dr. Woychik attended evidentiary hearings with the goal of tracking Utilities representations for cross-examination opportunities and briefing notes, Mr. Lopez monitored instructions from the ALJ regarding changes in the hearing schedule, timely filings of exhibits and responses, any necessary motions, confidentiality issues</p>	

	CPUC Discussion
<p>and briefing schedules. The three worked together and coordinated weekly, sometimes daily, to ensure a strong showing at evidentiary hearings and later briefings. UCAN asks the Commission to find this effort productive and necessary for meaningful participation in this proceeding in order to make a substantial contribution to the final decision.</p> <p><u>UCAN Attorney/ Jane Krikorian</u> – Ms. Krikorian is submitting hours for her early participation in helping to determine the course of action for the 2024 GRC. She assisted by reading Utilities testimonies, editing the Protest, researching companies for consultants and expert help, attending team meetings to help determine issues, reading early drafts of UCAN testimony, and finally assisting in writing and preparing the Intervenor Compensation claim. While one of the companies that UCAN interviewed early on was not hired, UCAN requests the Commission determine these hours reasonable as the cost of narrowing down the appropriate consultants and expert help in order to make an efficient substantial contribution. In this claim, Ms. Krikorian is requesting a new rate in the Attorney category due to her recent admittance to the California State Bar. Ms. Krikorian includes her resume detailing her 17 years of legal experience and 11 years at UCAN practicing before the Commission in Attachment E.</p> <p><u>UCAN Paralegal Courtney Cook-Sloan</u> – Ms. Cook-Sloan assisted with all filings throughout the 2024 GRC and has submitted time for work on the intervenor compensation claim formatting and editing timesheets.</p> <p><u>Efficiency Efforts</u> - UCAN’s goal in the 2024 GRC proceeding was to provide meaningful examination on behalf of ratepayers regarding the huge revenue requests proposed by the Utilities. Within its limited budget and resources, UCAN made calculated decisions on what issues to examine, how to proceed as efficiently as possible, and where to find the most reductions to save ratepayer dollars. UCAN made diligent efforts to make efficient use of its time and resources by delineating issues carefully to each witness, dividing tasks and roles throughout the proceeding and in particular at the evidentiary hearings as described above. UCAN supports its substantial contribution in Part II.A with the many citations in the final decision to its pleadings and recommendations. Due to UCAN’s success in achieving significant revenue reductions on behalf of ratepayers, UCAN urges the Commission to find its total amount of hours in this proceeding reasonable.</p>	

			CPUC Discussion																																																									
<p><u>Timesheets and Allocation of hours</u> – for Mr. Lopez and Mr. Zeller’s timesheets, an effort was made to break out their time by issues listed in Part II.A – Substantial Contribution. Time was also broken out by Initial Investigation, Identifying Issues, and Preparing and Presenting Issues (a “catch-all” for multiple issues within certain tasks) in order to reflect how UCAN spent its time and made its substantial contribution. UCAN provided a separate timesheet for Dr. Woychik with a different coding method for each issue and time spent on those issues.</p> <p><u>Additional Comments on Timesheets and hours:</u> UCAN worked diligently to comply with IComp Program Guide at 25 and avoid vagueness and/or combining tasks. UCAN asks that where there has been an oversight on this directive to find it minimal and therefore reasonable.</p>																																																												
<p><b>c. Allocation of hours by issue:</b></p> <table border="1"> <tbody> <tr><td>Advance Storage</td><td>9.50</td><td>1%</td></tr> <tr><td>Affordability</td><td>29.30</td><td>3%</td></tr> <tr><td>Clean Energy Innovation</td><td>17.25</td><td>2%</td></tr> <tr><td>Compensation and Benefits-Short-Term Incentive Compensation</td><td>97.50</td><td>10%</td></tr> <tr><td>Coordination with Other Parties</td><td>7.50</td><td>1%</td></tr> <tr><td>Customer Services</td><td>2.46</td><td>0%</td></tr> <tr><td>Distributed Energy Resource (DER)</td><td>36.80</td><td>4%</td></tr> <tr><td>Distribution</td><td>24.30</td><td>2%</td></tr> <tr><td>Evidentiary Hearing Prep and Attending Hearings</td><td>232.00</td><td>23%</td></tr> <tr><td>Field Service Delivery</td><td>10.91</td><td>1%</td></tr> <tr><td>Hydrogen Project</td><td>3.00</td><td>0%</td></tr> <tr><td>Identifying Issues</td><td>51.25</td><td>5%</td></tr> <tr><td>Initial Preparation</td><td>25.25</td><td>3%</td></tr> <tr><td>Insurance</td><td>30.75</td><td>3%</td></tr> <tr><td>IT Capital</td><td>79.66</td><td>8%</td></tr> <tr><td>Microgrids</td><td>5.75</td><td>1%</td></tr> <tr><td>Non-Lithium Battery</td><td>12.25</td><td>1%</td></tr> <tr><td>Planned Investments</td><td>2.50</td><td>0%</td></tr> <tr><td>Policy Overview</td><td>0.30</td><td>0%</td></tr> </tbody> </table>			Advance Storage	9.50	1%	Affordability	29.30	3%	Clean Energy Innovation	17.25	2%	Compensation and Benefits-Short-Term Incentive Compensation	97.50	10%	Coordination with Other Parties	7.50	1%	Customer Services	2.46	0%	Distributed Energy Resource (DER)	36.80	4%	Distribution	24.30	2%	Evidentiary Hearing Prep and Attending Hearings	232.00	23%	Field Service Delivery	10.91	1%	Hydrogen Project	3.00	0%	Identifying Issues	51.25	5%	Initial Preparation	25.25	3%	Insurance	30.75	3%	IT Capital	79.66	8%	Microgrids	5.75	1%	Non-Lithium Battery	12.25	1%	Planned Investments	2.50	0%	Policy Overview	0.30	0%	<p>Noted; however, these hours do not include consultant Dr. Woychik’s total hours of 1634.90.</p> <p>See Part III.D CPUC Comments, Disallowances, and Adjustments below.</p>
Advance Storage	9.50	1%																																																										
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Policy Overview	0.30	0%																																																										

			CPUC Discussion
Preparing and Presenting Issues – includes tasks within which multiple issues are addressed	309.25	31%	
<b>Total for Issues:</b>	<b>987.48</b>	<b>100%</b>	

**B. Specific Claim:\***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Edward Lopez	2022	143.48 <sup>3</sup>	\$455.00	D.24-01-019	\$65,283.40 <sup>4</sup>	71.12 [7,10]	\$450.00 [1]	\$32,004.00
Edward Lopez	2023	345 <sup>5</sup>	\$475.00	D.24-01-019	\$163,875.00 <sup>6</sup>	171.63 [10]	\$460.00 [1]	\$78,949.80
Edward Lopez	2024	23.75 <sup>7</sup>	\$495.00	See Comment 2	\$11,756.25 <sup>8</sup>	13.13 [10]	\$475.00 [1]	\$6,236.75
Jason Zeller	2022	64	\$725.00	D.24-05-016	\$46,400.00	32.00 [10]	\$715.00 [2]	\$22,880.00
Jason Zeller	2023	362	\$745.00	D.24-10-023	\$273,310.00 <sup>9</sup>	180.00 [8,10]	\$745.00 [2]	\$134,100.00
Jason Zeller	2024	24.5	\$770.00	D.24-10-023	\$19,232.50 <sup>10</sup>	12.25 [10]	\$770.00 [2]	\$9,432.50
Jane Krikorian	2022	17.5	\$360.00	D.25-02-XXX (Pending Decision from 2/20/2025 Voting Meeting)	\$6,300.00	12.75 [9]	\$360.00 [3]	\$4,590.00
Eric Woychik (Consultant)	2022	611.1	\$815.00	See Comment 3	\$498,046.50	253.68 [6,10]	\$815.00 [4]	\$206,749.20

<sup>3</sup> Timesheets reflect a total of 142.73 hours for 2022.

<sup>4</sup> Total should reflect \$64,942.15.

<sup>5</sup> Timesheets reflect a total of 343.25 hours for 2023.

<sup>6</sup> Total should reflect \$163,043.75.

<sup>7</sup> Timesheets reflect a total of 26.25 hours for 2024.

<sup>8</sup> Total should reflect \$12,993.75.

<sup>9</sup> Total should reflect \$269,690.00.

<sup>10</sup> Total should reflect \$18,865.00.

CLAIMED						CPUC AWARD		
Eric Woychik (Consultant)	2023	1023.8	\$815.00	See Comment 3	\$834,397.00	480.83 [6,10]	\$815.00 [4]	\$391,876.45
<b>Subtotal: \$1,918,600.65<sup>11</sup></b>						<b>Subtotal: \$886,818.70</b>		
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 \$
Courtney Cook-Sloan	2022	.5	\$195.00	D.24-01-019	\$97.50	0.5	\$195.00 [5]	\$97.50
Courtney Cook-Sloan	2023	6.75	\$205.00	D.24-01-019	\$1,383.75	6.75	\$205.00 [5]	\$1,383.75
Edward Lopez (Travel)	2024	10	247.50	See Comment 2	\$3,952.00 <sup>12</sup>	10	\$237.50 [1]	\$2,375.00
<b>Subtotal: \$5,406.25<sup>13</sup></b>						<b>Subtotal: \$3,856.25</b>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Edward Lopez	2022	3	\$227.50	D.24-01-019	\$682.50	3	\$225.00 [1]	\$675.00
Edward Lopez	2024	1	\$237.50	See Comment 2	\$237.50	1	\$237.50 [1]	\$237.50
Edward Lopez	2025	18.25	\$247.50	See Comment 1	\$4,516.88	10 [12]	\$242.50 [1]	\$2,425.00
Jason Zeller	2025	8	\$392.50	See Comment 1	\$3,140.00	4 [12]	\$397.50 [2]	\$1,590.00
Jane Krikorian	2025	36.50	\$272.50	See Comment 4	\$9,946.25	10 [12]	\$260.00 [3]	\$2,600.00
Courtney Cook-Sloan	2025	8.5	\$107.50	See Comment 1	\$913.75	4.25 [12]	\$110.00 [5]	\$467.50
<b>Subtotal: \$19,436.88</b>						<b>Subtotal: \$7,995.00</b>		

<sup>11</sup> Subtotal should reflect \$1,914,678.15.

<sup>12</sup> Total should reflect \$2,475.00.

<sup>13</sup> Subtotal should reflect \$3,956.25.

CLAIMED				CPUC AWARD
COSTS				
#	Item	Detail	Amount	Amount
1.	Southwest Flight Receipt	Southwest Flight from San Diego to San Francisco for Oral Arguments	\$267.96	\$227.96 [11]
			<b>Subtotal: \$267.96</b>	<b>Subtotal: \$227.96</b>
			<b>TOTAL REQUEST: \$1,943,711.74<sup>14</sup></b>	<b>TOTAL AWARD: \$898,897.91</b>
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§ 1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate</p>				
ATTORNEY INFORMATION				
Attorney	Date Admitted to CA BAR <sup>15</sup>	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation	
Edward Lopez	December 20, 1991	157052	No	
Jason Zeller	March 21, 1989	139477	No	
Jane Krikorian	January 3, 2025	359865	No	

### C. Attachments Documenting Specific Claim and Comments on Part III<sup>16</sup>:

Attachment or Comment #	Description/Comment
1	Certificate of Service
Attachments	Attachment A-UCAN Staff Timesheets Attachment B-UCAN Consultant Dr. Eric Woychik Timesheet Attachment C- UCAN Consultant Dr. Eric Woychik Contract and Invoices Attachment D-Dr. Eric Woychik Resume Attachment E-Jane Krikorian Resume

<sup>14</sup> The correct total requested amount is \$1,938,339.24.

<sup>15</sup> This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

<sup>16</sup> Attachments not included in the final decision.

<b>Attachment or Comment #</b>	<b>Description/Comment</b>
	Attachment F-Airfare for Oral Arguments
Comment 1 COLA increase Rate Request	The Commission has yet to adopt a 2025 COLA increase. UCAN requests the Commission to apply the 2025 COLA increase to Jason Zeller, Edward Lopez and Courtney Cook-Sloan for hours preparing the ICOMP in 2025. For 2025 UCAN is using 2024 rates.
Comment 2 2024 Rate Request for Edward Lopez	Based on the approved \$475 2023 hourly rate, per D.24-01-019, the application of the Commission’s 4.07% escalation for 2024, and rounding to the nearest \$5 increment, UCAN requests the 2024 hourly rate for Mr. Lopez of \$495.
Comment 3 2022 and 2023 Rate Request for Dr. Eric Woychik (Consultant)	<p>UCAN requests a new rate for Dr. Eric Charles Woychik based on Resolution ALJ-393 Adopting Intervenor Compensation Market Rate Study and Addressing Related Matters issued December 22, 2020 and the Hourly Rate Chart (Effective January 1, 2021.) The Resolution directs intervenors to use the Hourly Rate Chart spreadsheet available on the Commissions ICOMP webpage to determine the appropriate hourly rate when completing claims for work performed on or after January 1, 2021. Consequently, Dr. Woychik needs to establish an appropriate rate according to the labor roles and rates established by this resolution and found in the hourly rate chart. Dr. Woychik’s responsibilities are consistent with the title of Top Economic Executive with 40 years of total experience with a B.S. degree (Environmental Planning and Policy Analysis), over 30 years of experience with a Master’s Degree in Regulatory Economics, and 16 years of experience with a Doctorate in Business Administration, working on advanced economics and policy projects in over 40 countries and extensively in North America.</p> <p>Dr. Woychik has 27+ years as policy-analytic and management executive, beginning as a CPUC Commissioner Advisor (for 6 years), and then a consulting executive with Synergic Resources Corporation, Strategy Integration, LLC, Comverge Inc., Black &amp; Veatch, Itron, and has been Senior Vice President of Willdan Group Inc for the last 5 years. In these roles Dr. Woychik has supervised numerous groups of experts to perform model development, data analytics, econometrics, production cost and capacity expansion projects, and cost-effectiveness analysis. Dr. Woychik was one of two primary authors of the CPUC/CEC California Standard Practice for Cost Effectiveness of Demand-Side Measures (1983), now used across most of North America and a number of other countries, a modeling system he continues to work with to this day. Dr. Woychik has been responsible for development of the economic</p>

Attachment or Comment #	Description/Comment
	<p>vision and strategy for energy development at Willdan Group Inc., which has a demand-side portfolio in California of over \$1 billion dollars. He excels at micro- and macro-economic forecasting and the development of advanced modeling efforts for same. Dr. Woychik has published over 150 papers and reports, including a number of book chapters, is former member of CAISO’s Board of Governors, and is currently a Fellow in Puerto Rico at both the Institute for Competitiveness and Sustainable Economy and Energy Justice.</p> <p>In addition, Dr. Woychik has practiced before more than 30 regulatory commissions in North America, lectured at prominent universities on energy economics and policy, and testified on over 50 occasions before regulatory bodies and courts. His involvement in recent UCAN’s proceedings includes the Procurement Cost Adjustment Charge (PCIA, R.17-06-026) where he provided overview testimony, Risk-Based Ratemaking Proceeding (R.20-07-013), the Gas OIR proceeding (R. 20-01-007), and the SDG&amp;E/SoCal Gas RAMP proceeding.</p> <p>Dr. Woychik’s last approved rate was for 2018 as an expert at \$305/hour in the PCIA proceeding (D.19-10-049). Finally, Dr. Woychik has been directly involved in a series of non-profit management efforts, most notably to develop and provide board leadership for Community Options for Families and Youth (COFY) a dedicated set of staff that offer critical services to foster-children and their parents.</p> <p>Due to Dr. Woychik’s education, experience and current responsibilities, UCAN is requesting a rate of <b>\$815</b> which is the median Level V rate with 15+ years’ experience and an education of Ph.D./Doctorate/Masters degree.</p>
<p>Comment 4 Rate Request for Jane Krikorian</p>	<p><b><u>Request for 2025 Hourly Rate Pursuant to Resolution ALJ-393</u></b></p> <p><b>UCAN Representative:</b> Jane Krikorian  <b>Labor Role:</b> Legal – Attorney  <b>Level:</b> III (5-10 yrs experience)  <b>2025 Hourly Rate Range (estimated):</b> \$379 - \$589  <b>Requested Hourly Rate:</b> \$545  <b>Current Resume:</b> See Attachment E</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</p>

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

Attachment or Comment #	Description/Comment
	<p>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>

**D. CPUC Comments, Disallowances, and Adjustments**

Item	Reason
<p>[1] Edward Lopez's 2022, 2023, 2024 &amp; 2025 Intervenor Compensation Rate</p>	<p>D.23-05-022 previously approved a 2022 hourly rate of \$455 for Lopez. However, the 2022 hourly rate for individuals classified as an Executive Director – Level V, for which Lopez is classified, is maxed at \$451.75. As such we correct Lopez's 2022 hourly rate to \$450 in this decision.</p> <p>With the application of the 4.46% escalation factor using Resolution ALJ-393, the 2023 hourly rate is \$470. However, given the 2023 hourly rate is maxed at \$464.81 for an Executive Director – Level V, we approve a 2023 hourly rate of \$460 for Lopez.</p> <p>With the application of the 4.07% escalation factor using Resolution ALJ-393, the 2024 hourly rate is \$475. We approve this 2024 rate for Lopez.</p> <p>With the application of the 3.46% escalation factor using Resolution ALJ-393, the 2025 hourly rate is \$485. We approve this 2025 rate for Lopez. As Intervenor Compensation Claim Preparation hours are compensated at ½ preparer's normal hourly rate, we apply the rate of \$242.50 for Lopez.</p>
<p>[2] Jason Zeller's 2022, 2023, 2024 &amp; 2025 Intervenor Compensation Rate</p>	<p>D.25-06-028 approved a 2022 hourly rate of \$715 for Zeller.</p> <p>D.24-10-023 approved a 2023 and 2024 hourly rate of \$745 and \$770 respectively for Zeller.</p> <p>With the application of the 3.46% escalation factor for 2025 using Resolution ALJ-393, we approve a 2025 hourly rate of \$795 for Zeller, rounded to the nearest five-dollar increment. As Intervenor</p>

Item	Reason
	<p>Compensation Claim Preparation hours are compensated at ½ preparer’s normal hourly rate, we apply the rate of \$397.50 for Zeller.</p>
<p>[3] Jane Krikorian’s 2022, 2025 Hourly Rate &amp; Intervenor Compensation Rate</p>	<p>D.25-02-024 approved a 2022 hourly rate of \$360 for Krikorian.</p> <p>D.25-03-027 approved a 2024 hourly rate of \$390 for Krikorian. UCAN requests a new 2025 rate for Krikorian in the Attorney category based on her recent admittance to the California Bar in January 2025. While 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 Kriokian’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. Per Resolution 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 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 Krikorian.</p>
<p>[4] Eric Woychik’s 2022 &amp; 2023 Hourly Rate</p>	<p>UCAN identified Woychik as an outside consultant.</p> <p>UCAN has confirmed that per the terms of their contract, Woychik has been hired on a contingency rate basis, meaning the consultant 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 Woychik’s experience. Given the 2022 Expert – Top Economic Executive – V rate range is \$756.06 to \$1,079.74, with a median of</p>

Item	Reason
	<p>\$943.00, we find the 2022 hourly rate of \$815 to be reasonable and we apply it here.</p> <p>Given the 2023 Expert – Top Economic Executive – V rate range is \$798.11 to \$1,121.79, with a median of \$985.05, we find the 2023 hourly rate of \$815 to be reasonable and we apply it here.</p>
<p>[5] Courtney Cook-Sloan's 2022 &amp; 2023 Hourly Rate &amp; 2025 Intervenor Compensation Rate</p>	<p>D.23-11-041 approved a 2022 hourly rate of \$195 for Cook-Sloan.</p> <p>D.24-01-019 approved a 2023 hourly rate of \$205 for Cook-Sloan.</p> <p>D.25-02-024 approved a 2024 hourly rate of \$215 and with the application of the 3.46% escalation factor for 2025 using Resolution ALJ-393, we approve a 2025 hourly rate of \$220, rounded to the nearest five-dollar increment. As Intervenor Compensation Claim Preparation hours are compensated at ½ preparer's normal hourly rate, we apply the rate of \$110 for Cook-Sloan.</p>
<p>[6] Eric Woychik's 2022 &amp; 2023 Hours</p>	<p><u>Multiple Timesheet Entries/Combined Tasks</u> (51.20 total hours, with 50% reduction = 25.6 total hours):</p> <p>UCAN improperly combined multiple vague or insufficiently described tasks in single time entries. Pursuant to Rule 17.4, each time record shall identify the specific task performed. We recognize that some entries may reflect related activities within a broader task; however, several entries combined what appears to be distinct tasks without adequate detail. While we are not disallowing all the entries submitted that combined multiple vague or insufficiently described tasks in this claim, we do identify a few, and caution UCAN that future claims containing vague or non-compliant entries may result in a reduction of all these hours.</p> <p>The select entries below reflect multiple separate tasks described in overly general terms. UCAN should provide clearer descriptions so that Commission staff are not left to make assumptions. Additionally, these entries lack the necessary detail to determine their relevance or value to the proceeding, and do not comply with program requirements. Intervenor bears the burden of proof to show that all claimed hours were spent efficiently and made a substantial contribution, as required under program guidelines.</p> <p>Therefore, the following hours below are reduced by 50% for failure to comply with program guidelines:</p> <p>2022 hours (10.50 hours, with 50% reduction = 5.25 hours):</p>

Item	Reason
	<ul style="list-style-type: none"> <li>• Revise and send draft to UCAN; GRC check in conf call with Ed and Jason (3.20 hours)</li> <li>• Revise draft and send; GRC check in conf call with Ed and Jason (7.30 hours)</li> </ul> <p>2023 hours (40.70 hours, with 50% reduction = 20.35 hours):</p> <ul style="list-style-type: none"> <li>• Brief Valero and larger picture, review SDG&amp;E motion (4 July) (6.30 hours)</li> <li>• Risk Based Ratemaking (RBR) (R.2007013) research, email PCF re. Mr. Powers (1.10 hours)</li> <li>• History of rate increases, as demand declines, conf call w Ed/Jason (7.30 hours)</li> <li>• Finish corrections to testimony, compile draft x-exam Qs, times, send Ed/Jason (7.10 hours)</li> <li>• Unravel claims of Mr. Thai, email TURN (9.60 hours)</li> <li>• Public Advocates, use parts of their brief in Reply, email Public advocates, others (9.30 hours)</li> </ul> <p><u>Vagueness (170.3 total hours reduced):</u>            UCAN failed to provide adequate descriptions for the following time entries, leaving it unclear how this time contributed to the decision-making process. These entries appear to be statements or titles of issues, rather than descriptions of the tasks performed. It is the responsibility of the intervenor to provide adequate descriptions that clearly support how their time led to a decision. See Rule 17.4 of the Rules of Practice and Procedure, and D.10-02-010, Part III.D. The following are reduced as vague and lack the necessary detail to demonstrate how it contributed to the decision-making process:</p> <p>2022 hours (98.50 hours reduced):</p> <ul style="list-style-type: none"> <li>• SDG&amp;E lacks spending on innovation or more advanced technologies like DSO (8.50 hours)</li> <li>• Illuminate outmoded, obsolete tech, immediate DER opportunities, rate base (4.60 hours)</li> <li>• Requirements in R20-05-003, R21-06-035, customer infrastructure for DERs (7.10 hours)</li> <li>• Field Service Delivery, RAMP, and obsolescence with high DER scenario (6.80 hours)</li> <li>• Digital workspace, IT capital, virtual workspace, suitability for customer services (6.30 hours)</li> <li>• Explain minimal compliance, maximum rate base, with obsolete technology (7.00 hours)</li> <li>• CPUC monopoly concerns, recommendation on Contact Center for the Future (6.60 hours)</li> </ul>

Item	Reason
	<ul style="list-style-type: none"> <li>• Gordon-Exon likelihood of stranded assets; life-cycle review critique (8.40 hours)</li> <li>• Define 12 key concerns, research, write out (15.50 hours)</li> <li>• Major likelihood of stranded costs, not a priority for customer related assets (6.20 hours)</li> <li>• Risk with climate change, not climate change adaptation (4.80 hours)</li> <li>• SDG&amp;E lacks compliance, fails to recognize smart grid directions, CalFUSE (8.50 hours)</li> <li>• Major differences in Cross Functional Factors (CFF), RSEs only used partially (5.30 hours)</li> <li>• How AI will inform grid choices very soon; SDG&amp;E should refile RAMP inputs (2.90 hours)</li> </ul> <p>2023 hours (71.80 hours reduced):</p> <ul style="list-style-type: none"> <li>• Customer data needs, smart inverter services, Rule-21 resiliency benefits (15.40 hours)</li> <li>• Refine obsolete issue with limited timing, scale/scope of proposed projects (7.80 hours)</li> <li>• Customer service operations not justified, particularly with high DER future (2.90 hours)</li> <li>• Risks/uncertainty of distribution circuit control technology compared to DERs (8.40 hours)</li> <li>• Rate base growth vs. inflation, SB 695 Report, use/ explain graphics (7.80 hours)</li> <li>• Major issues with cost effectiveness, economic criteria; refine arguments (6.40 hours)</li> <li>• Environmental and GHG impacts, promises without compliance (9.20 hours)</li> <li>• Raise issues about unrecorded generation and battery storage rate base (4.00 hours)</li> <li>• Define each account and dollar recommendation, summarize (9.90 hours)</li> </ul>
<p>[7] Lopez’s 2022 hours</p>	<p><u>Lack of Contribution to Decision Making Process (0.50 hours reduced):</u>                      NDAs constitute preparatory work rather than an analysis or advocacy that shaped the Commission’s decision, and UCAN has not demonstrated a clear connection between NDA related hours and its substantive input. Furthermore, the reduced hours include entries that</p>

Item	Reason
	<p>similarly did not contribute to the final decision-making process and are therefore, disallowed:</p> <ul style="list-style-type: none"> <li>• 09/14/2022: Review NDA from SDG&amp;E re: Discovery; Communicate w/ Staff &amp; Dr. Woychik re: Compliance</li> </ul>
[8] Zeller's 2023 hours	<p><u>Public Participation Hearing (2.00 hours reduced)</u> PPHs are intended to provide an opportunity for presentations by the public at large instead of parties to the proceeding. Thus, the Commission does not award intervenors compensation for their time spent preparing for, or attending, PPHs. We therefore reduce 2.00 hours related to the PPH:</p> <ul style="list-style-type: none"> <li>• 03/23/2023: Appearance at Public Participation Hearing</li> </ul>
[9] Krikorian's 2022 hours	<p><u>Lack of Contribution to Decision Making Process (0.50 reduced):</u> NDAs constitute preparatory work rather than an analysis or advocacy that shaped the Commission's decision, and UCAN has not demonstrated a clear connection between NDA related hours and its substantive input. Furthermore, the reduced hours include entries that similarly did not contribute to the final decision-making process:</p> <ul style="list-style-type: none"> <li>• 09/14/2022: Reading SDG&amp;E NDA</li> </ul> <p><u>Lack of Contribution to Decision Making Process (4.25 hours reduced):</u> UCAN researched and interviewed Synapse Energy Economics for expert help but ultimately did not hire them. UCAN requests that the Commission determine the hours for researching companies for consultants and expert help reasonable as the cost of narrowing down the appropriate consultants and expert help in order to make an efficient substantial contribution. We understand the importance of experts in a GRC proceeding; however, we find these hours dedicated as preparatory work rather than an analysis that shaped the Commission's decision-making process.</p> <p>Therefore, we reduce the following hours:</p> <ul style="list-style-type: none"> <li>• 06/27/2022: Researching Synapse Energy economics for possible experts (0.50 hours)</li> <li>• 06/27/2022: Emailing Synapse Energy Economics re: expert help (0.25 hours)</li> </ul>

Item	Reason
	<ul style="list-style-type: none"> <li>• 07/11/2022: Phone call w/ Eric Borden at Synapse Energy (0.25 hours)</li> <li>• 07/20/2022: Responding to Eric Borden’s (Synapse Energy) to begin determining exhibits to work on (0.25 hours)</li> <li>• 08/09/2022: Reading Synapse Energy proposal (0.75 hours)</li> <li>• 08/10/2022: Teams meeting with Eric Borden re: Synapse Energy’s proposal (0.50 hours)</li> <li>• 08/30/2022: Emailing Tim Wolf at Synapse Energy re: GRC Testimony assistance (0.25 hours)</li> <li>• 09/01/2022: Emailing staff re: Synapse Energy Teams meeting information (0.25 hours)</li> <li>• 09/22/2022: Preparing for meeting w/ Synapse and proposed SDG&amp;E exhibits (0.50 hours)</li> <li>• 09/22/2022: Attending meeting w/ Eric Borden at Synapse Energy re: proposal and exhibits (0.50 hours)</li> <li>• 09/22/2022: Emailing Edward Lopez re: Synapse proposal (0.25 hours)</li> </ul>
<p>[10] Reduction for Excessive Hours</p>	<p><b><u>Duplication of Effort:</u></b></p> <p>UCAN’s consultant (Dr. Eric Woychik) claims a total of 1,634.90 hours in 2022 and 2023 for his work on D.24-12-074, while UCAN’s three experienced attorneys and one paralegal claimed a total of 987.48 hours. UCAN describes that Dr. Woychik conducted analyses and wrote major portions of the main documents filed by UCAN in this proceeding including testimony, opening brief and reply brief, and comments on the proposed decision. Additionally, UCAN identified that Mr. Zeller and Dr. Woychik coordinated the review of nearly 50 Chapters of Utilities testimony and rebuttal testimony, analyzing relevant workpapers, preparing data requests, participating at evidentiary hearings, joining settlement discussions, and making arguments on behalf of ratepayers. On March 27, 2023, 353 pages of direct testimony was produced by expert Dr. Woychik providing recommendations for multiple capital and O&amp;M reductions. Likewise, on March 27, 2023, 30 pages of testimony was provided by Zeller discussing compensation and insurance that ultimately led to negotiating the Insurance Settlement. Moreover, Mr. Lopez, Mr. Zeller and Dr. Woychik remotely attended evidentiary hearings, and each participant monitored the hearings daily, flagging issues for further coordination and responses either in cross-examination or briefing. The three worked together and coordinated weekly,</p>

Item	Reason
	<p>sometimes daily, to ensure a showing at evidentiary hearings and later briefings.</p> <p>Based on a review of the submitted timesheet and available filings, we find the total requested hours – not including Intervenor Compensation Claim Preparation time – to be excessive for Dr. Woychik,<sup>17</sup> Mr. Lopez and Mr. Zeller, given all members of UCAN aided in researching, analyzing, and reviewing substantive issues addressed in D.24-12-074, and when viewed in the context of the overall record of this proceeding. UCAN requests almost \$2,000,000 for work int his proceeding. In comparing other intervenors with comparable experience and size of contribution, we note that both EDF and CEJA requested compensation for work on the same or similar issues amounting to approximately one-third of UCAN’s total request. These comparisons reinforce our conclusion that UCAN’s requested hours are disproportionately high and not fully justified.</p> <p><b><u>Lack of Substantial Contribution:</u></b></p> <p>Additionally, as highlighted in Part II.A, merely supporting the positions of other parties—without offering additional analysis, a distinct perspective, or unique factual or legal contributions—does not constitute a significant contribution. While an intervenor’s alignment with a particular position can be helpful in informing the Commission’s decision-making process, the hours claimed for such support must be reasonable. Ratepayers should not bear the cost of excessive time spent by an intervenor reiterating arguments that have already been presented by others in the proceeding.</p> <p>In our determination that UCAN made a contribution, we also evaluate whether the hours claimed were commensurate with the contributions made. Making a substantial contribution in and of itself does not entitle an intervenor to all its claimed fees and costs. Compensation is granted for efficient, meaningful contributions. Because UCAN’s efforts were excessive and were not sufficiently contributory, we reduce the following hours from Dr. Woychik, Mr. Zeller and Mr. Lopez, as it appropriately</p>

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<sup>17</sup> The hours requested by Dr. Woychik is excessive given the total pages produced for the direct testimony (353 pages), Opening Brief (200 pages), Reply Brief (80 pages) and Comments on the PD (13 pages).

Item	Reason																																								
	<p>acknowledges the value of UCAN’s contributions. The award granted herein is commensurate with that level of contribution.</p> <table border="1" data-bbox="516 396 1421 772"> <thead> <tr> <th data-bbox="521 401 708 470">Name</th> <th data-bbox="708 401 850 470">Year</th> <th data-bbox="850 401 1045 470">Hours Requested<sup>18</sup></th> <th data-bbox="1045 401 1265 470">Hours Disallowed</th> <th data-bbox="1265 401 1416 470">Hours Awarded</th> </tr> </thead> <tbody> <tr> <td data-bbox="521 470 708 583" rowspan="3"><b>Zeller</b></td> <td data-bbox="708 470 850 506">2022</td> <td data-bbox="850 470 1045 506">64.00</td> <td data-bbox="1045 470 1265 506">32.00</td> <td data-bbox="1265 470 1416 506">32.00</td> </tr> <tr> <td data-bbox="708 506 850 541">2023</td> <td data-bbox="850 506 1045 541">360.00</td> <td data-bbox="1045 506 1265 541">180.00</td> <td data-bbox="1265 506 1416 541">180.00</td> </tr> <tr> <td data-bbox="708 541 850 583">2024</td> <td data-bbox="850 541 1045 583">24.50</td> <td data-bbox="1045 541 1265 583">12.25</td> <td data-bbox="1265 541 1416 583">12.25</td> </tr> <tr> <td data-bbox="521 583 708 697" rowspan="3"><b>Lopez</b></td> <td data-bbox="708 583 850 619">2022</td> <td data-bbox="850 583 1045 619">142.23</td> <td data-bbox="1045 583 1265 619">71.12</td> <td data-bbox="1265 583 1416 619">71.12</td> </tr> <tr> <td data-bbox="708 619 850 655">2023</td> <td data-bbox="850 619 1045 655">343.25</td> <td data-bbox="1045 619 1265 655">171.63</td> <td data-bbox="1265 619 1416 655">171.63</td> </tr> <tr> <td data-bbox="708 655 850 697">2024</td> <td data-bbox="850 655 1045 697">26.25</td> <td data-bbox="1045 655 1265 697">13.13</td> <td data-bbox="1265 655 1416 697">13.13</td> </tr> <tr> <td data-bbox="521 697 708 772" rowspan="2"><b>Woychik</b></td> <td data-bbox="708 697 850 732">2022</td> <td data-bbox="850 697 1045 732">507.35</td> <td data-bbox="1045 697 1265 732">253.68</td> <td data-bbox="1265 697 1416 732">253.68</td> </tr> <tr> <td data-bbox="708 732 850 772">2023</td> <td data-bbox="850 732 1045 772">931.65</td> <td data-bbox="1045 732 1265 772">480.83</td> <td data-bbox="1265 732 1416 772">480.83</td> </tr> </tbody> </table>	Name	Year	Hours Requested <sup>18</sup>	Hours Disallowed	Hours Awarded	<b>Zeller</b>	2022	64.00	32.00	32.00	2023	360.00	180.00	180.00	2024	24.50	12.25	12.25	<b>Lopez</b>	2022	142.23	71.12	71.12	2023	343.25	171.63	171.63	2024	26.25	13.13	13.13	<b>Woychik</b>	2022	507.35	253.68	253.68	2023	931.65	480.83	480.83
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<p>[11] Claimed Travel Hours &amp; Travel Expenses</p>	<p>Section 1801.3(f) provides that the Commission should administer the Intervenor Compensation Program “in a manner that avoids unproductive or unnecessary participation that duplicates the participation of similar interests otherwise adequately represented or participation that is not necessary for a fair determination of the proceeding.”</p> <p>The following hours are reduced from Lopez’s 2024 travel hours:</p> <ul style="list-style-type: none"> <li>• 11/04/2024, 10.00 hours, “Round trip from San Diego to San Francisco for Oral Arguments.” Receipts provided by UCAN show the flight duration to be 2.60 hours, roundtrip. We acknowledge that the time claimed for travel is acceptable. However, regarding the flight details, Lopez has included a \$40.00 charge for Southwest Airlines EarlyBird Check-In. This is an optional feature that allows passengers automatic check-in 36 hours prior to departure and provides earlier boarding access. The Commission considers this charge avoidable, as it is a personal convenience rather than a necessary travel expense. As such, we reduce \$40.00 from Lopez’s travel fees.</li> </ul>																																								
<p>[12] Excessive IComp Preparation Hours</p>	<p>UCAN claimed 75.25 hours for preparation of the intervenor compensation request. While the claim was decently detailed (see Part III.D CPUC Comments, Disallowances, and Adjustments Item [6]), and generally compliant with Commission requirements,</p>																																								

<sup>18</sup> The values include the total after the disallowance made above [6, 7, 8].

Item	Reason
	<p>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. Accordingly, we reduce Krikorian’s IComp 2025 hours to 10 total hours, Lopez’s IComp 2025 hours to 10 total hours, Zeller’s IComp 2025 hours to 4 total hours and Cook-Sloan’s IComp 2025 hours to 4.5 total hours.</p> <p>This adjustment better reflects the complexity and scale of the request as comparable with other intervenors requesting compensation for D.24-12-074.</p>
<p>[13] 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>

**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))**

<b>A. Opposition: Did any party oppose the Claim?</b>	No
<b>B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?</b>	No

If not:

Party	Comment	CPUC Discussion

**FINDINGS OF FACT**

1. Utility Consumers’ Action Network has made a substantial contribution to D.24-12-074.
2. The requested hourly rates for Utility Consumers’ Action Network’s representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services, 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 \$898,897.91.

**CONCLUSION OF LAW**

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

**ORDER**

1. Utility Consumers’ Action Network is awarded \$898,897.91.
2. Within 30 days of the effective date of this decision, Southern California Gas Company and San Diego Gas & Electric Company shall pay Utility Consumers’ Action Network their respective shares of the award, based on their California-jurisdictional gas revenues

for the 2023 calendar year, to reflect the year in which the proceeding was primarily litigated. If such data is unavailable, the most recent gas 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 May 7, 2025, the 75<sup>th</sup> day after the filing of Utility Consumers' Action Network's request, and continuing until full payment is made.

3. The comment period for today's decision is waived.

This decision is effective today.

Dated \_\_\_\_\_, at San Francisco, California.

## APPENDIX

## Compensation Decision Summary Information

<b>Compensation Decision:</b>		<b>Modifies Decision?</b>	No
<b>Contribution Decision(s):</b>	D2412074		
<b>Proceeding(s):</b>	A2205015, et al.		
<b>Author:</b>	ALJ Larsen		
<b>Payer(s):</b>	Southern California Gas Company and San Diego Gas & Electric Company		

## Intervenor Information

<b>Intervenor</b>	<b>Date Claim Filed</b>	<b>Amount Requested</b>	<b>Amount Awarded</b>	<b>Multiplier?</b>	<b>Reason Change/ Disallowance</b>
Utility Consumers' Action Network	2/21/2025	\$1,943,711.74 <sup>14</sup>	\$898,897.91	N/A	See Part III.D CPUC Comments, Disallowances, and Adjustments above.

## Hourly Fee Information

<b>First Name</b>	<b>Last Name</b>	<b>Attorney, Expert, or Advocate</b>	<b>Hourly Fee Requested</b>	<b>Year Hourly Fee Requested</b>	<b>Hourly Fee Adopted</b>
Edward	Lopez	Attorney	\$455	2022	\$450
Edward	Lopez	Attorney	\$475	2023	\$460
Edward	Lopez	Attorney	\$495	2024	\$475
Edward	Lopez	Attorney	\$495	2025	\$485
Jason	Zeller	Attorney	\$725	2022	\$715
Jason	Zeller	Attorney	\$755	2023	\$745
Jason	Zeller	Attorney	\$785	2024	\$770
Jason	Zeller	Attorney	\$785	2025	\$795
Jane	Krikorian	Advocate	\$360	2022	\$360
Jane	Krikorian	Attorney <sup>19</sup>	\$545	2025	\$520
Courtney	Cook-Sloan	Advocate	\$195	2022	\$195
Courtney	Cook-Sloan	Advocate	\$205	2023	\$205
Courtney	Cook-Sloan	Advocate	\$215	2024	\$215 <sup>20</sup>
Courtney	Cook-Sloan	Advocate	\$215	2025	\$220

<sup>19</sup> The Commission classifies Krikorian as Legal – Legal Director – III for 2025.

<sup>20</sup> UCAN did not request a rate for 2024; however, this decision requests an intervenor compensation rate for 2025, therefore, we utilize the approved rate in D.25-02-024 to calculate the 2025 rate for Cook-Sloan.

<b>First Name</b>	<b>Last Name</b>	<b>Attorney, Expert, or Advocate</b>	<b>Hourly Fee Requested</b>	<b>Year Hourly Fee Requested</b>	<b>Hourly Fee Adopted</b>
Eric	Woychik	Expert <sup>21</sup>	\$815	2022	\$815
Eric	Woychik	Expert <sup>21</sup>	\$815	2023	\$815

(END OF APPENDIX)

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<sup>21</sup> Dr. Woychik has been identified as a consultant for UCAN.