

BEFORE THE PUBLIC UTILITIES COMMISSION OF  
THE STATE OF CALIFORNIA



**FILED**

04/07/26

04:59 PM

R2504010

Order Instituting Rulemaking for Oversight  
of Energy Efficiency Portfolios, Policies,  
Programs, and Evaluation.

Rulemaking 25-04-010  
(Filed April 24, 2025)

**CENTER FOR ACCESSIBLE TECHNOLOGY'S RESPONSE TO  
ALJ RULING REQUESTING SUPPLEMENTAL INFORMATION**

Melissa W. Kasnitz  
Center for Accessible Technology  
3075 Adeline Street, Suite 220  
Berkeley, CA 94703  
Phone: (510) 841-3224  
Fax: (510) 841-7936  
E-mail: [service@c4at.org](mailto:service@c4at.org)

April 7, 2026

## I. INTRODUCTION

On March 12, 2026, the Administrative Law Judges assigned to this proceeding issued a ruling requesting supplemental information from Center for Accessible Technology (CforAT) regarding our Notice of Intent to claim intervenor compensation. The information requested in the ruling is as follows:

- a. A list of any Center for Accessible Technology's officers, directors, voting members, constituents or other decision-makers, who may be affiliated with entities, (including commercial, nonprofit, or government), that participate in industries or markets regulated by the Commission, or who are affiliated with market participants. Center for Accessible Technology shall include the name of each affiliated entity and describe the individual's role within that entity.
- b. A current copy of the Center for Accessible Technology's bylaws

## II. DISCUSSION

### A. Response to Request a:

Per the requirements of the Ruling, a list of the members of CforAT's Board of Directors, including officers, is provided as Attachment A to this filing. CforAT is providing information about the professional affiliations of all officers and directors.

As noted in CforAT's original NOI, CforAT is not a membership organization.<sup>1</sup> As such, we have no voting members. Rather, we represent a constituency of utility customers with disabilities, a population that is disproportionately low income and highly dependent on reliable and affordable access to utility services in order to support their ability to live independently. Because this constituency includes all Californians with disabilities who live within the service territory of a regulated energy IOU as well as all Californians with disabilities who obtain

---

<sup>1</sup> CforAT has routinely indicated this fact in our NOIs since the organization began participating as an intervenor before the Commission in 2011.

communications service from a provider under the Commission’s jurisdiction, and because estimates of the portion of the population that has a disability range from approximately 13% to over 28%, we believe it is necessarily the case that there are members of our constituency who are affiliated with entities that participate in industries or markets regulated by the Commission or who are affiliated with market participants. However, CforAT has no way to identify these constituents by either name or role. In our day-to-day work among our constituency, we are not aware of any direct industry participants or contacts.

**B. Response to Request b:**

A copy of CforAT’s current bylaws, marked as “Restated on June 24, 2022” is provided as Attachment B to this filing. In our original NOI filed in this proceeding July 17, 2025, CforAT stated as follows:

The Center for Accessible Technology (CforAT) is an organization that is authorized by its bylaws to represent the interests of residential customers with disabilities before the Commission; specifically, our bylaws state at Article 2.1(d) that CforAT is “involved in advocacy initiatives to enhance the lives of the disability community, including ways to improve access to technology and increase the ability of people with disabilities to live independently. In particular, CforAT is authorized and urged to actively participate and intervene before government entities, including but not limited to the California Public Utilities Commission, on all matters that it deems appropriate that will affect directly or indirectly the interests of residential customers with disabilities, ratepayers with disabilities, small businesses owned by people with disabilities, including customers who receive bundled electric service from an electrical corporation.” CforAT is not a membership organization.

A copy of CforAT’s bylaws were submitted with our NOI in A.10-03-014, which was filed on August 29, 2011. No relevant changes have been made since that time. An additional copy can be provided upon request.

Consistent with that representation, Article 2.1(d) of the Restated Bylaws describes the relevant element of the organization’s objectives and purposes as follows:

To be involved in advocacy initiatives to enhance the lives of the disability community, including ways to improve access to technology and increase the ability of people with disabilities to live independently. In particular, the Corporation is authorized and urged to actively participate and intervene before government entities, including but not limited to the California Public Utilities Commission, on all matters that it deems appropriate that will affect directly or indirectly the interests of residential customers with disabilities, ratepayers with disabilities, and small business owned by people with disabilities, including customers who receive bundled electric service from an electrical corporation.

We note as non-substantive changes from the prior version that our initial submission in 2011 referenced “small businesses owned by people with disabilities” while the Restated Bylaws references “small business owned by people with disabilities.” Additionally, our initial submission stated that “CforAT is authorized” to intervene before the Commission, while the Restated Bylaws refer to the organization as “the Corporation.” There are no other changes.

### **III. CONCLUSION**

CforAT appreciates the opportunity to provide up-to-date information to the Commission establishing our ongoing eligibility for intervenor compensation in accordance with the relevant statutory authority and Commission rules.

Respectfully submitted,  
April 6, 2026

/s/ Melissa W. Kasnitz  
MELISSA W. KASNITZ

Center for Accessible Technology  
3075 Adeline Street, Suite 220  
Berkeley, CA 94703  
Phone: 510-841-3224  
Fax: 510-841-7936  
Email: [service@c4at.org](mailto:service@c4at.org)

## **Attachment A**

BYLAWS  
OF  
THE CENTER FOR ACCESSIBLE TECHNOLOGY  
A California Nonprofit Corporation

*RESTATED JUNE 24, 2022*

**A. ARTICLE I - NAME, OFFICES, REGISTERED AGENT**

1.1. **Name.** The name of this corporation is The Center for Accessible Technology (the "Corporation").

1.2. **Offices.** The Board of Directors shall fix the location of the principal executive office of the Corporation at any place within or outside California. The Board of Directors may change the location of the principal office; this section may be amended to state the new location. The Corporation may have such other offices, either within or without the State of California, as the Board of Directors may determine or as the affairs of the Corporation may require.

1.3. **Registered Agent.** The Executive Director is the registered agent for the purpose of representing the Corporation to the California Secretary of State. Should there be no Executive Director, the President of the Board of Directors is the registered agent.

1.4. **Members.** This corporation has no members, so pursuant to Section 5310(b) of the Nonprofit Public Benefit Corporation Law of the State of California, any action which would otherwise require membership approval shall require only approval of the Board of Directors. All rights which would otherwise vest in members shall vest in the Board of Directors.

**ARTICLE II - PURPOSES**

2.1. **Objectives and Purposes.** The primary objectives and purposes of this Corporation shall be:

(a) To provide access to computers, adaptive equipment and other useful technology for people with disabilities.

(b) To provide services so children with disabilities can succeed in school, adults with disabilities can find (and keep) jobs and all people with disabilities can use the internet, email and equipment so that they can live an independent and desegregated life.

(c) To provide business consulting services to corporations, libraries, and government entities. The agency provides input on creating accessible websites and maintains a test bank of users with disabilities to test products and services.

(d) To be involved in advocacy initiatives to enhance the lives of the disability community, including ways to improve access to technology and increase the ability of people with disabilities to live independently. In particular, the Corporation is authorized and urged to actively participate and intervene before government entities, including but not limited to the California Public Utilities Commission, on all matters that it deems appropriate that will affect directly or indirectly the interests of residential customers with disabilities, ratepayers with disabilities, and small business owned by people with disabilities, including customers who receive bundled electric service from an electrical corporation.

## **B. ARTICLE III-BOARD OF DIRECTORS**

3.1. **General Powers.** The affairs, activities and property of the Corporation shall be managed, directed and controlled by and its power exercised by and vested in the Board of Directors of the Corporation (the "Board of Directors"). Directors need not be residents of the State of California.

3.2. **Number.** The authorized number of directors of this corporation shall be not less than three nor more than thirteen. The exact number of directors shall be fixed by resolution of the Board of Directors. The indefinite number of directors may be changed, or a definite number fixed, without provision for an indefinite number by an amendment to the Articles of Incorporation or these Bylaws.

3.3. **Composition.** The Board of Directors shall be composed of a majority of members who have disabilities themselves, or are family members of someone with a disability, or have an enduring interest in our mission.

3.4. **Terms, Election of Directors, and Vacancies.** Directors of the corporation shall be elected by the Board to terms of one to three years. Each director, including a director elected to fill a vacancy, shall hold office until the expiration of the term for which the director was elected and until a successor has been elected. Vacancies on the Board of Directors, whether or not caused by removal, may be filled by a majority of the directors then in office, regardless of whether they constitute a quorum or by a sole remaining director. No reduction in the authorized number of directors shall have the effect of removing any director prior to the expiration of such director's term of office.

### **3.5. Removal of Directors.**

(a) **For Cause.** The Board of Directors may declare vacant the office of any director who has been declared to be of unsound mind by final court order, convicted of a felony, or found by a final court order or judgment to have breached any duty under Article 3 (relating to standards of conduct) of the California Nonprofit Corporation Law.

(b) Resignation. Any director may resign by giving notice to the Chairperson of the Board, the President, the Secretary or the Board of Directors. The resignation of a director shall be effective when notice is given unless the notice specifies a later time. The resignation shall be effective regardless of whether it is accepted by the corporation. Except upon notice to the Attorney General of the state of California, no director may resign when the corporation would then be left without a duly elected director or directors in charge of its affairs.

(c) Without Cause. Any director may be removed without cause if such removal is approved by a majority of the directors then in office.

**3.6. Directors Conflict of Interest.** Not more than 49% of the persons serving on the Board of Directors may be interested persons. For purposes of this Section, an interested person is either

(a) any person currently being compensated by the corporation for services rendered to the corporation within the previous 12 months, whether as a full-time or part-time employee, independent contractor or otherwise, excluding any reasonable compensation paid to a director as director; or

(b) any brother, sister, ancestor, descendant, spouse, brother-in-law, sister-in-law of any such person.

**3.7. Committees of the Board.** The Board of Directors may, by resolution adopted by a majority of the number of directors then in office, provided that a quorum is present, create one or more committees of the Board, each consisting of two or more directors, to serve at the pleasure of the Board. Appointments to any such committee shall be by a majority vote of the directors then in office. The Board may appoint one or more directors as alternate members of any such committee who may replace any absent member at any meeting of the committee. To the extent permitted in the resolution of the Board of Directors, any such committee may exercise all of the authority of the Board except:

(a) The approval of any action which, under the California Nonprofit Corporation Law, would also require approval by the members or by a majority of all members, were this a corporation with members.

(b) The filling of vacancies on the Board or any committee which has the authority of the Board.

(c) The fixing of compensation of the directors for serving on the Board or any committee.

(d) The adoption, amendment, or repeal of bylaws.

- (e) The amendment or repeal of any resolution of the Board which by its express terms is not so amendable.
- (f) The appointment of committees of the Board or the members of such committees.
- (g) The expenditure of corporate funds to support a nominee for director after there are more people nominated for director than can be elected.
- (h) The approval of any self-dealing transaction, except as provided in Section S233(d)(3) of the California Nonprofit Corporation Law.

3.8. **Remote Meetings.** Directors may participate in a meeting through use of conference telephone, electronic video screen communication or electronic transmission by and to the Corporation, so long as all of the following apply:

- (a) each director participating in the meeting can communicate with all the other directors concurrently;
- (b) each director is provided the means of participating in all matters before the Board of Directors, including the capacity to propose, or to interpose an objection to, a specific action to be taken by the Corporation; and
- (c) the Corporation has the ability and uses a means of verifying that a person communicating by telephone, electronic video equipment or other communications equipment is a director entitled to participate in the board meeting; and that all statements, questions, actions, or votes were made by that director and not by another person not permitted to participate as a director.

Participation in a meeting pursuant to this bylaw shall constitute presence in person at such meeting.

3.9. **Quorum.** A majority of the Board of Directors then in office shall constitute a quorum for the transaction of business at any meeting of the Board, but if less than a majority of the Directors then in office are present at such meeting, a majority of the Directors present may adjourn the meeting from time to time without further notice.

3.10. **Manner of Acting.** The act of a majority of the Board of Directors present at a meeting at which a quorum is present shall be the act of the Board of Directors, unless the act of a greater number of Directors is required by law or by these Bylaws.

3.11. **Inspection of Records and Properties.** Each director may inspect all books, records, documents and physical properties of the corporation at any reasonable time. The right of the inspection includes the right to copy and make extracts.

3.12. **Special Meetings.** The chairperson of the Board, the President, the Secretary, or any two directors may call a meeting of Board of Directors.

3.13. **Action without Meeting.** Any action required by law to be taken at a meeting of the Board of Directors, or any action which may be taken at a meeting of the Board of Directors, may be taken without a meeting if a consent in writing setting forth the action so taken is approved by all of the Directors. The written consent or consents shall be filed with the minutes of the proceedings of the Board and the action taken shall have the same force and effect as a unanimous vote of Directors. For purposes of this Section 3.13 only, "all of the Directors" shall not include an "interested director" as defined in Section 5233 of the California Nonprofit Corporation Law.

3.14. **Committee Meetings.** The principles set forth in section 3.12 and 3.13 of these bylaws shall apply to committees of the Board and to actions taken by such committees.

3.15. **Liability of Directors.** Except as provided in Section 5233 of the California Nonprofit Corporation Law, a person who performs the duties of a director in accordance with Section 5231(a) and (b) of the California Nonprofit Corporation Law shall have no liability based on any alleged failure to discharge that person's obligations as a director, including, without limiting the generality of the foregoing, any actions or omissions which exceed or defeat a public or charitable purpose to which the Corporation, or assets held by it, are dedicated.

3.15. **Duty of Loyalty.** The Directors shall act in the best interest the Corporation. In any case in which a potential or actual conflict of interest between a Director and the Corporation may arise, the Director shall inform the other Directors of the Corporation of such potential or actual conflict and the Board of Directors shall authorize, approve or ratify the transaction or agreement by a vote sufficient without counting the vote of such Director or Directors. The Directors whose votes are not counted may nonetheless be included in determining the presence of a quorum at a meeting.

3.16. **Roles and Responsibilities of the Board of Directors.** The Board of Directors of the Corporation shall have the following responsibilities:

- a. Provide continuity for the organization by setting up a corporation or legal existence, and to represent the organization's point of view through interpretation of its products and services, and advocacy for them.
- b. Select and hire an Executive Director to whom responsibility for the administration of the organization is delegated, including:
  - i. to review and evaluate his/her performance regularly on the basis of a specific job description, including executive relations with the board, leadership in the organization, in program planning and implementation, and in management of the organization and its personnel

- ii. to offer administrative guidance and determine whether to retain or dismiss the Executive Director.
- c) Govern the organization by broad policies and objectives, formulated and agreed upon by the Executive Director and employees, including to assign priorities and ensure the organization's capacity to carry out programs by continually reviewing its work.
- d) Ensure that sufficient resources for the Corporation's continued operation are identified and obtained.
- e) Account to the public for the products and services of the organization and expenditures of its funds, including:
  - i. to provide for fiscal accountability, approve the budget, and formulate policies related to contracts from public or private resources
  - ii. to accept responsibility for all conditions and policies attached to new, innovative, or experimental programs.

#### **ARTICLE IV - OFFICERS**

**4.0. Officers.** The officers of the corporation shall include a President, Secretary and a Treasurer. The Board of Directors may also appoint one or more Vice Presidents, Assistant Secretaries, Assistant Financial Officers or other officers. Any number of offices may be held by the same person, except that neither the Secretary nor the Treasurer may serve concurrently as the President or Chairperson of the Board. All

officers shall perform their duties and exercise their powers subject to the direction of the Board of Directors.

**4.1. Appointments, Terms of Office and Vacancies.** The Officers of the corporation shall be appointed by the Board of Directors. The Board may appoint officers or fill vacant offices at any time. The officers shall hold office until their successors are chosen except that Board of Directors may remove an officer at any time subject to such officer's rights, if any, under a contract of employment.

**4.2. Resignation.** Any officer may resign at any time upon written notice to the corporation without prejudice to the rights, if any, of the corporation under any contract to which the officer is a party. The resignation of the officer shall be effective when notice is given unless the notice specifies a later time. The resignation shall be effective regardless of whether it is accepted by the corporation.

**4.3. Removal.** Any officer elected or appointed by the Board of Directors may be removed by the Board of Directors whenever in its judgment the best interests of the Corporation would

be served thereby, but such removal shall be without prejudice to the contract rights, if any, of the officer so removed.

**4.4. Vacancies.** A vacancy in any office because of death, resignation, removal, disqualification or otherwise, may be filled by the Board of Directors for the unexpired term.

**4.5. President of the Board.** The President shall preside at all meetings of the Board of Directors of the Corporation, and shall have such other powers and duties not inconsistent with these Bylaws as may be assigned to him or her from time to time by the Board. In the absence of the President of the Board, the Executive Director of the Corporation shall preside at meetings of the Board. In all cases, the Executive Director will not be a voting member of the Board.

**4.6. Treasurer/Chief Financial Officer.** Unless the Board of Directors designates otherwise, the Treasurer will be considered the Chief Financial Officer of the corporation. The Treasurer shall:

- a. Be cognizant of all funds and securities of the corporation, and serve as a signer for bank accounts, mutual funds, and other depositories.
- b. Review monthly or quarterly financial statements and annual reports of the corporation's business transactions, including accounts of its assets, liabilities, receipts, disbursements, gains and losses.
- c. Review the annual audit, federal tax return, and state filings.
- d. Oversee the financial affairs of the corporation to ensure that appropriate checks and balances are in place, and to develop policies related to check signing authority, expense reimbursement, credit cards, investments, and petty cash.
- e. Work with the Executive Director to ensure that filing requirements are met.

**4.7. Secretary.** Unless otherwise determined by the Board of Directors or the Executive Director the Secretary shall have the following powers and duties:

- a) Record of Corporate Proceedings. The Secretary shall attend all meetings of the Board of Directors and its committees and shall record all votes and the minutes of such meetings in a book to be kept at the principal office in a format that is accessible to all members of the Board of Directors. The Secretary shall certify these Bylaws as amended or otherwise altered to date, and ensure that original copies of the corporation's Articles of Incorporation and Bylaws, as amended, are kept at the corporation's principal office in California, and are available to all members of the Board of Directors.

b) Notices. The Secretary shall give such notices as may be required by law or these Bylaws.

c) In general, perform all duties incident to the office of Secretary and such other duties as may be required by law, by the Articles of Incorporation of this corporation, or by these Bylaws, or which may be assigned to him or her from time to time by the Board of Directors.

**4.8. Salaries.** The Board of Directors shall fix the salary of the Executive Director and may fix the salaries of other employees of the corporation including the other officers. If the Board does not set the other employee salaries, the Executive Director shall fix such salaries.

### **C. ARTICLE 5- REPORTS**

a. Annual Report. The corporation shall furnish annually to all directors a report containing the following information, in appropriate detail and accompanied by a report of independent accountants or (if there is no report of independent accountants) the certificate of the Treasurer/Chief Financial Officer or other authorized officer that such information was prepared without audit from the books and records of the corporation.

(i) The assets and liabilities, including the trust funds, of the corporation as of the end of the fiscal year.

(ii) The principal changes in assets and liabilities, including trust funds, during the fiscal year.

(iii) The revenue or receipts of the corporation, both unrestricted and restricted to particular purposes, for the fiscal year.

(iv) The expenses or disbursements of the corporation, for both general and restricted purposes, during the fiscal year.

(v) Any information required by subsection (b) below.

b. Annual Statement. For purposes of this subsection (b), a "covered transaction" is a transaction in which the corporation, its parent or its subsidiary was a party, and in which either of the following "interested persons" had a direct or in direct or indirect material financial interest (other than a mere common directorship): (1) any director of officer of the corporation, its parent or its subsidiary (2) any holder of more than 10 percent of the voting power of the corporation, its parent or its subsidiary. The corporation shall include in the annual report to directors required by subsection (a) above a statement briefly describing:

(i) Any covered transaction during the previous fiscal year involving more than \$40,000, or which was one of a number of covered transactions in which the same interested person had a direct or indirect material financial interest, and which transactions in the aggregate involved more than \$40,000. The description shall include the names of the interested person or persons involved in such transaction, such person's relationship to the corporation, the nature of such person's interest in the transaction and, where practicable, the amount of such interest.

(ii) The amount and circumstances of any indemnifications or advances aggregating more than \$10,000 paid during the fiscal year to any officer or director of the corporation.

#### **IV. ARTICLE 6-AMENDMENT OF BY-LAWS**

Subject to any provision of law applicable to the amendment of Bylaws of public benefit nonprofit corporations, these Bylaws, or any of them, may be altered, amended, or repealed and new Bylaws adopted by approval of the Board of Directors.

#### **V. ARTICLE 7 - PROHIBITION AGAINST SHARING CORPORATE PROFITS AND ASSETS**

No director, officer, employee, or other person connected with this corporation, or any private individual, shall receive at any time any of the net earnings or pecuniary profit from the operations of the corporation, provided, however, that this provision shall not prevent payment to any such person of reasonable compensation for services performed for the corporation in effecting any of its public or charitable purposes, provided that such compensation is otherwise permitted by these Bylaws and is fixed by resolution of the Board of Directors; and no such person or persons shall be entitled to share in the distribution of, and shall not receive, any of the corporate assets on dissolution of the corporation.

---

#### **VI. CERTIFICATE OF THE SECRETARY**

I certify that I am the duly elected and acting Secretary of Center for Accessible Technology, a California nonprofit public benefit corporation; that these Bylaws, consisting of 9 pages, are the bylaws of this corporation as adopted by the Board of Directors on June 28, 2022; and that these bylaws have not been amended or modified since that date.

**E O** Berkeley, California.

Signature of Lisa Wahl, Secretary

## **Attachment B**

## CforAT Directors and Officers

<b>Name</b>	<b>Board Position</b>	<b>Joined</b>	<b>Employment</b>
Judi Rogers	President	1986	Retired, former occupational therapist, Through the Looking Glass
Sarah Stapleton-Gray	Secretary	2024	Webmaster, La Clinica de la Raza
Lisa Wahl	Treasurer	2021	Retired, former nonprofit consultant. Also former Executive Director at CforAT from 1990-2000 (until approximately 1995, the organization was known as the Disabled Children’s Computer Group)
Sara Armstrong		1999	Educator, Author, Storyteller
Ray Grott		2024	Retired, former Director of the Rehabilitation Engineering Technology (RET) Project at San Francisco State University
Todd Groves		2024	Retired, former school administrator
Katy Morsony*		2023	Director of Policy and Senior Counsel, California Community Choice Association (CalCCA)
Sharda Parajuli		2024	Human Resources Manager, Through the Looking Glass
Travis Winfrey		2025	Software Engineer, Bubble

\* Katy Morsony is CforAT’s only Board member who is “affiliated with entities...that participate in industries or markets regulated by the Commission.” Ms. Morsony works for the California Community Choice Association (CalCCA). Her title is Director of Policy and Senior Counsel. CalCCA is a policy organization that represents the interests of the various Community Choice Aggregators in California. While each CCA is a market participant, CalCCA is effectively a trade association, and is not a direct market participant.

In her role, Ms. Morsony works under the direction of the CalCCA executive team to support the organization’s policy team, and she provides coordination and support for the legislative affairs, regulatory affairs and data analytics teams. Her work includes conducting review and providing recommendations in coordination with the director of regulatory affairs on administrative filings. It also includes analysis and drafting of legislative proposals. Ms. Morsony also supports CalCCA’s General Counsel in managing governance matters.

CforAT’s Board of Directors generally has no involvement in overseeing the work of the Legal/Policy Team in its advocacy before the CPUC. To the extent that the CforAT Board of Directors might ever conduct any direct oversight of the Legal/Policy Team’s work, Ms. Morsony has committed to recuse herself from any discussion and/or vote that might be taken by the Board to direct Legal/Policy advocacy in a CPUC proceeding.

Prior to joining CalCCA (and at the time she joined CforAT's Board), Ms. Morsony was a Staff Attorney at The Utility Reform Network (TURN), where she worked on behalf of residential ratepayers on energy issues before the California Public Utilities Commission. As a member of CforAT's Board, Ms. Morsony can assist other Board members, who have no involvement with utility regulation, in understanding the unfamiliar aspects of CforAT's advocacy work.