



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

04/07/26

Pacific Gas and Electric Company's (U39M) Application for Approval of its 2028-2033 Income-Qualified Programs.	<p style="text-align: right;">FILED 04:59 PM Application 26-01-003 A2601003 (Filing Date January 9, 2026)</p>
CONSOLIDATED	
Application Of Southern California Edison Company (U338E) for Approval of its Energy Savings Assistance (ESA) and California Alternate Rates for Energy (CARE) Programs and Family Electric Rate Assistance (FERA) And Budgets for Program Years 2028-2033.	Application 26-01-005 (Filing Date January 9, 2026)
Application of San Diego Gas & Electric Company (U902M) for Approval of Low-Income Assistance Programs and Budgets for Bridge Funding for Program Years 2028-2033.	Application 26-01-010 (Filing Date January 9, 2026)
Application of Southern California Gas Company (U904G) for Approval of its Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets for Program Years 2028-2033.	Application 26-01-011 (Filing Date January 9, 2026)

**NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION
AND, IF REQUESTED (and ¹ checked), ADMINISTRATIVE LAW JUDGE'S
RULING ON CENTER FOR ACCESSIBLE TECHNOLOGY'S SHOWING OF
SIGNIFICANT FINANCIAL HARDSHIP**

NOTE: AFTER ELECTRONICALLY FILING A PDF COPY OF THIS NOTICE OF INTENT, PLEASE EMAIL THE DOCUMENT IN AN MS WORD FORMAT TO THE INTERVENOR COMPENSATION PROGRAM COORDINATOR AT Icompcoordinator@cpuc.ca.gov.

Customer or Eligible Local Government Entity (party intending to claim intervenor compensation): Center for Accessible Technology (CforAT)	
Assigned Commissioner: Matthew Baker	Administrative Law Judge: Garrett Toy

¹ DO NOT CHECK THIS BOX if a finding of significant financial hardship is not needed (in cases where there is a valid rebuttable presumption of eligibility (Part III(A)(3)) or significant financial hardship showing has been deferred to the intervenor compensation claim).

I hereby certify that the information I have set forth in Parts I, II, III and IV of this Notice of Intent is true to my best knowledge, information and belief.		
Signature:		/ S/ Melissa W. Kasnitz
Date: April 7, 2026	Printed Name:	Melissa W. Kasnitz

PART I: PROCEDURAL ISSUES
(To be completed by the party intending to claim intervenor compensation)

A. Status as “customer” (see Pub. Util. Code § 1802(b)) ² The party claims “customer” status because the party is (check one):	Applies (check)
<p>1. A Category 1 customer is an actual customer whose self-interest in the proceeding arises primarily from his/her role as a customer of the utility and, at the same time, the customer must represent the broader interests of at least some other customers. See, for example, D.08-07-019 at 5-10).</p>	<input type="checkbox"/>
<p>2. A Category 2 customer is a representative who has been authorized by actual customers to represent them. Category 2 involves a more formal arrangement where a customer or a group of customers selects a more skilled person to represent the customer’s views in a proceeding. A customer or group of customers may also form or authorize a group to represent them, and the group, in turn, may authorize a representative such as an attorney to represent the group.</p>	<input type="checkbox"/>
<p>3. A Category 3 customer is a formally organized group authorized, by its articles of incorporation or bylaws to represent the interests of residential customers or small commercial customers receiving bundled electric service from an electrical corporation (§1802(b)(1)(C)). Certain environmental groups that represent residential customers with concerns for the environment may also qualify as Category 3 customers, even if the above requirement is not specifically met in the articles or bylaws. See D.98-04-059, footnote at 30.</p>	<input checked="" type="checkbox"/>
<p>4. The party’s detailed explanation of the selected customer category.</p> <p><u>The party’s explanation of its status as a Category 1 customer.</u> A party seeking status as a Category 1 customer must describe the party’s own interest in the proceeding and show how the customer’s participation goes beyond just his/her own self-interest and will benefit other customers. Supporting documents must include a copy of the utility’s bill.</p> <p><u>The party’s explanation of its status as a Category 2 customer.</u> A party seeking status as a Category 2 customer must identify the residential customer(s) being represented and provide authorization from at least one customer.</p>	

² All statutory references are to California Public Utilities Code unless indicated otherwise.

<p>The party’s explanation of its status as a Category 3 customer. If the party represents residential and small commercial customers receiving bundled electric service from an electrical corporation, it must include in the Notice of Intent either the percentage of group members that are residential ratepayers or the percentage of the members who are receiving bundled electric service from an electrical corporation. Supporting documentation for this customer category must include current copies of the articles of incorporation or bylaws. If current copies of the articles and bylaws have already been filed with the Commission, only a specific reference (the proceeding’s docket number and the date of filing) to such filings needs to be made.</p> <p>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, 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, small business owned by people with disabilities, including customers who receive bundled electric service from an electrical corporation.” CforAT is not a membership organization.</p> <p>The language cited above is taken from CforAT’s 2022 Restated Bylaws, a copy of which was submitted with CforAT’s Response to ALJ Ruling Requesting Supplemental Information in R.25-04-010, filed on April 7, 2026. A copy of a previous version of CforAT’s bylaws was submitted with our NOI in A.10-03-014, which was filed on August 29, 2011. The relevant provision of the Restated Bylaws has no substantive changes from the prior version. An additional copy of either version can be provided upon request.</p>	
<p>Do you have any direct economic interest in outcomes of the proceeding?³</p> <p>If “Yes”, explain:</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>B. Conflict of Interest (§ 1802.3)</p>	<p>Check</p>
<p>1. Is the customer a representative of a group representing the interests of small commercial customers who receive bundled electric service from an electrical corporation?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>2. If the answer to the above question is “Yes”, does the customer have a conflict arising from prior representation before the Commission?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>C. Status as an Eligible Local Government Entity (§§1802(d), 1802.4, 1803.1)</p>	

³ See Rule 17.1(f).

<p>The party claims “eligible local government entity” status because the party is a city, county, or city and county that is not a publicly owned public utility that intervenes or participates in a Commission proceeding for the purpose of protecting the health and safety of the residents within the entity’s jurisdiction following a catastrophic material loss suffered by its residents either in significant damage to infrastructure or loss of life and property, or both, as a direct result of public utility infrastructure.</p>	<p><input type="checkbox"/> Yes R No</p>
<p>The party’s explanation of its status as an eligible local government entity must include a description of</p> <ol style="list-style-type: none"> (1) The relevant triggering catastrophic event; (2) The impacts of the triggering catastrophic event on the residents within the entity’s jurisdiction as a result of public utility infrastructure; and (3) The entity’s reason(s) to participate in this proceeding. 	
<p>D. Timely Filing of Notice of Intent to Claim Intervenor Compensation (NOI) (§ 1804(a)(1)):</p>	
<p>1. Is the party’s NOI filed within 30 days after a Prehearing Conference? Date of Prehearing Conference: 3/12/2026</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>2. Is the party’s NOI filed at another time (for example, because no Prehearing Conference was held, the proceeding will take less than 30 days, the schedule did not reasonably allow parties to identify issues within the timeframe normally permitted, or new issues have emerged)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>2a. The party’s description of the reasons for filing its NOI at this other time:</p>	
<p>2b. The party’s information on the proceeding number, date, and decision number for any Commission decision, Commissioner ruling, Administrative Law Judge’s ruling, or other document authorizing the filing of NOI at that other time:</p>	

**PART II: SCOPE OF ANTICIPATED PARTICIPATION
(To be completed by the party intending to claim intervenor compensation)**

<p>A. Planned Participation (§ 1804(a)(2)(A)):</p>
<p>The party’s statement of the issues on which it plans to participate:</p> <p>No Scoping Memo has yet been issued in this proceeding, so this statement of issues on which CforAT plans to participate is subject to change. Based on the Draft Scoping Issues provided to parties in advance of the Prehearing Conference in the Administrative Law Judge Ruling Directing Parties to Consider Draft Scope and Schedule (issued on March 10, 2025), CforAT expects to participate as follows:</p> <ul style="list-style-type: none"> • CARE Issues: CforAT expects to participate broadly on all issues related to proposed CARE budgets, enrollment goals, design and implementation, and associated performance standards. CforAT also expects to participate on any review of the

CHANGES program and has proposed that the scope of the proceeding include potential consolidation of the CHANGES program with the CBO Pilot Program authorized in R.18-07-005. If this recommendation is accepted, CforAT anticipates active participation on the consideration of such consolidation.

- FERA Issues: CforAT expects to participate broadly on all issues related to proposed FERA budgets, enrollment goals, design and implementation, and associated performance standards. CforAT also expects to participate in consideration of FERA program reporting requirements.
- ESA Issues: CforAT expects to participate broadly on issues related to the ESA program with the exception of consideration of the cost-effectiveness of specific measures or proposed measures and any other similar technical assessments of program elements.
- Other Issues: CforAT expects to participate broadly on issues listed in the Draft Scoping Memo as “Other CARE/FERA/ESA Issues” with the exception of consideration of cost-effectiveness issues or other technical issues related to various program elements.
- Concurrent Application System: CforAT expects to continue its ongoing work addressing the implementation of the CAS and future enhancements.
- Data Sharing: CforAT expects to address policy issues regarding data sharing, but does not expect to participate in any technical process for implementation of data sharing systems that may be authorized.
- Definition Issues: CforAT expects to participate in briefing and any other actions scheduled by the Commission to address the identified definitional issues set forth in the Draft Scoping Memo.

The party’s explanation of how it plans to avoid duplication of effort with other parties:

As we have done in prior cycles addressing the utilities’ income-qualified program applications, CforAT will work with other consumer advocates to coordinate participation and avoid duplication of effort. We anticipate working with the Public Advocates Office, TURN, and any other consumer advocates where our positions and interests overlap. Additionally, CforAT will limit participation on certain issues where other advocates have greater levels of expertise, such as addressing technical program elements.

The party’s description of the nature and extent of the party’s planned participation in this proceeding (to the extent that it is possible to describe on the date this NOI is filed).

While no Scoping Memo has yet been issued, the draft schedule issued in advance of the PHC, the consensus schedule submitted by parties, and the discussion at the PHC indicate that evidentiary hearings may be held. The draft schedule also contemplates early briefing on definitional issues and further party testimony. Past experience with proceedings overseeing IQPs and party input at the PHC indicate that workshops are also likely.

CforAT anticipates submitting briefs, written comments and testimony as authorized by any schedule that may be set. We further anticipate participating actively at any workshops that may be set, as well as at evidentiary hearings. CforAT may work with other parties, separately or as part of a larger effort to narrow disputes and pursue resolution of various proposals.

B. The party’s itemized estimate of the compensation that the party expects to request, based on the anticipated duration of the proceeding (§ 1804(a)(2)(A)):

Item	Hours	Rate \$	Total \$	#
ATTORNEY, EXPERT, AND ADVOCATE FEES				
Melissa W. Kasnitz	160	\$805	\$128,800	
Rachel Sweetnam	80	\$300	\$24,000	
Kate Woodford	50	\$390	\$19,500	
[Expert 2]				
[Advocate 1]				
[Advocate 2]				
<i>Subtotal: \$172,300</i>				
OTHER FEES				
[Person 1]				
[Person 2]				
<i>Subtotal: \$</i>				
COSTS				
[Item 1]				
[Item 2]				
<i>Subtotal: \$172,300</i>				
TOTAL ESTIMATE: \$172,300				

Estimated Budget by Issues:

- CARE Issues: 20%**
- FERA Issues: 15%**
- ESA Issues: 15%**
- Other Issues: 20%**
- CAS Issues: 10%**
- Data Sharing Issues: 10%**
- Definition Issues: 10%**

When entering items, type over bracketed text; add additional rows to table as necessary. Estimate may (but does not need to) include estimated Claim preparation time. Claim preparation time is typically compensated at 1/2 professional hourly rate.

**PART III: SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP
(To be completed by party intending to claim intervenor compensation;
see Instructions for options for providing this information)**

A. The party claims that participation or intervention in this proceeding without an award of fees or costs imposes a significant financial hardship, on the following basis:	Applies (check)
1. The customer cannot afford, without undue hardship, to pay the costs of effective participation, including advocate’s fees, expert witness fees, and other reasonable costs of participation. (§ 1802(h))	x
2. In the case of a group or organization, the economic interest of the Individual members of the group or organization is small in comparison to the costs of effective participation in the proceeding. (§ 1802(h))	x
3. The eligible local government entities’ participation or intervention without an award of fees or costs imposes a significant financial hardship. (§ 1803.1(b).)	<input type="checkbox"/>
<p>4. A § 1802(h) or § 1803.1(b) finding of significant financial hardship in another proceeding, made within one year prior to the commencement of this proceeding, created a rebuttable presumption in this proceeding (§ 1804(b)(1)).</p> <p>Commission’s finding of significant financial hardship made in proceeding number:</p> <p>Date of Administrative Law Judge’s Ruling (or CPUC Decision) in which the finding of significant financial hardship was made:</p>	<input type="checkbox"/>

B. The party’s explanation of the factual basis for its claim of “significant financial hardship” (§ 1802(h) or § 1803.1(b)) (necessary documentation, if warranted, is attached to the NOI:

In our practice before the Commission since 2011, CforAT has routinely been found eligible for intervenor compensation based on a showing of significant financial hardship. CforAT’s last formal ruling on significant financial hardship supporting our eligibility for intervenor compensation was issued on March 15, 2024 in R.22-11-013, response to a submission of supplemental financial information filed on July 21, 2023. CforAT currently has multiple pending requests for a renewed finding.

On March 12, 2026, in R.25-04-010, the Commission issued a ruling requesting supplemental information from CforAT following submission of an NOI in that proceeding. CforAT’s response providing the requested supplemental information is being submitted concurrently with this NOI, on April 7, 2026. In that ruling, the Commission also noted a finding of eligibility made in D.24-10,028, issued on October 17, 2024 in R.22-07-005. CforAT has

also been awarded compensation, based on a finding of eligibility, in multiple additional proceedings since that time.

At all times during our work before the Commission, CforAT has represented our constituency of utility customers with disabilities (including many low-income customers) for no charge to the community. Our constituency is highly dependent on reliable and affordable access to utility services to support their ability to live independently in the community. CforAT relies on the intervenor compensation program to sustain our ability to represent this unique constituency before the Commission. CforAT has no other source of support for the work we do to represent these vulnerable consumers before the Commission, and few people with disabilities have the resources or awareness of utility issues to consider representation through private counsel.

While CforAT’s work provides value to our constituency, the value for each individual customer is small compared to the cost of representation; often this value comes in the form of improved accessibility of utility services and communications (and thus improved customers understanding of programs and services available) or improved reliability of service rather than in the form of monetary benefit. This interest cannot easily be expressed as an economic interest, but it remains crucial to a vulnerable customer group. If the intervenor compensation program were not available, CforAT would be unable to continue this work.

PART IV: ATTACHMENTS DOCUMENTING SPECIFIC ASSERTIONS MADE IN THIS NOTICE

(The party intending to claim intervenor compensation identifies and attaches documents; add rows as necessary)

Attachment No.	Description
1	Certificate of Service

ADMINISTRATIVE LAW JUDGE RULING⁴
(Administrative Law Judge completes)

	Check all that apply
1. The Notice of Intent (NOI) is rejected for the following reasons:	<input type="checkbox"/>
a. The NOI has not demonstrated the party’s status as a “customer” or an “eligible local government entity” for the following reason(s):	<input type="checkbox"/>

⁴ A Ruling needs not be issued unless: (a) the NOI is deficient; (b) the Administrative Law Judge desires to address specific issues raised by the NOI (to point out similar positions, areas of potential duplication in showings, unrealistic expectations for compensation, or other matters that may affect the customer or eligible local government entity’s Intervenor Compensation Claim); or (c) the NOI has included a claim of “significant financial hardship” that requires a finding under § 1802(h).

b. The NOI has not demonstrated that the NOI was timely filed (Part I(B)) for the following reason(s):	<input type="checkbox"/>
c. The NOI has not adequately described the scope of anticipated participation (Part II, above) for the following reason(s):	<input type="checkbox"/>
2. The NOI has demonstrated significant financial hardship for the reasons set forth in Part III of the NOI (above).	<input type="checkbox"/>
3. The NOI has not demonstrated significant financial hardship for the following reason(s):	<input type="checkbox"/>
4. The Administrative Law Judge provides the following additional guidance (see § 1804(b)(2)):	<input type="checkbox"/>

IT IS RULED that:

1. The Notice of Intent is rejected.	<input type="checkbox"/>
2. The customer or eligible local government entity has satisfied the eligibility requirements of Pub. Util. Code § 1804(a).	<input type="checkbox"/>
3. The customer or eligible local government entity has shown significant financial hardship.	<input type="checkbox"/>
4. The customer or eligible local government entity is preliminarily determined to be eligible for intervenor compensation in this proceeding. However, a finding of significant financial hardship in no way ensures compensation.	<input type="checkbox"/>
5. Additional guidance is provided to the customer or eligible local government entity as set forth above.	<input type="checkbox"/>

Dated _____, at San Francisco, California.

Administrative Law Judge