



FORM A: BLANK NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION

FILED

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking Proceeding to Consider Service Quality Rules for Wireless Carriers.	Rulemaking 26-02-017 (Filed February 26, 2026)
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NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION AND, IF REQUESTED (and checked), ADMINISTRATIVE LAW JUDGE'S RULING ON THE UTILITY REFORM NETWORK'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 compcoordinator@cpuc.ca.gov.

Customer or Eligible Local Government Entity (party intending to claim intervenor compensation): The Utility Reform Network	
Assigned Commissioner:	Administrative Law Judge:
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:	
Date: May 5, 2026	Printed Name: Alexandra Green

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)
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	<input type="checkbox"/>

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

<p>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>	
<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> <p><u>The party’s explanation of its status as a Category 3 customer.</u> 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><i>TURN’s Explanation of the Selected Customer Category</i></p> <p>TURN is a Category 3 “group or organization authorized pursuant to its articles of incorporation or bylaws to represent the interests of residential ratepayers.” TURN provided the relevant portion of our articles of incorporation in the NOI submitted in</p>	

<p>A.98-02-017, and again in A.99-12-024. On October 15, 2015, TURN’s Board of Directors adopted amendments to TURN’s bylaws and articles of incorporation. TURN provided these revised bylaws and articles of incorporation in an amendment to the NOI submitted in A.15-09-001. TURN believes the vast majority of our members are residential ratepayers. TURN does not poll our members in a manner that would allow a precise breakdown between residential and small business members, so a precise percentage is not available. Similarly, TURN believes that the vast majority of our members receive bundled electric service from an electrical corporation. TURN does not poll our members in a manner that would allow a precise breakdown between those who receive bundled electric service from an IOU, those who receive electric service from a municipal utility and gas service from an IOU, and those who might be a CCA customer or Direct Access customer.</p>	
<p>Do you have any direct economic interest in outcomes of the proceeding? ³ 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 type="checkbox"/> Yes <input checked="" 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 type="checkbox"/> No</p>
<p>C. Status as an Eligible Local Government Entity (§§1802(d), 1802.4, 1803.1)</p>	
<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 <input checked="" type="checkbox"/> No</p>
<p>The party’s explanation of its status as an eligible local government entity must include a description of (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>	
<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: 4/8/2026</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

³ See Rule 17.1(f).

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)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2a. The party’s description of the reasons for filing its NOI at this other time:	
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:	

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

A. Planned Participation (§ 1804(a)(2)(A)):
<p>The party’s statement of the issues on which it plans to participate:</p> <p>At this time, the Commission has not adopted a final scope for this proceeding. Based on the preliminary scope of issues in the OIR and TURN’s advocated scope, TURN anticipates addressing the following issues:</p> <ul style="list-style-type: none"> • Are there any existing service quality metrics that should be extended to wireless voice services? • Should the Commission modify any of the existing service quality metrics and standards or develop new service quality standards and reporting requirements applicable to wireless voice services? Are there reporting requirements or metrics that the Commission should not mandate? • What service quality metrics and reporting requirements should apply to voice over fixed wireless? • Do the wireline service quality requirements sufficiently fulfill the requirements of Public Utilities Code Section 2899 and address the unique needs of IPCS end users? <ul style="list-style-type: none"> ○ If no, what specific service quality metrics and standards, reporting requirements, and enforcement framework should the Commission adopt? • Should the Commission adopt service quality metrics and standards and reporting requirements applicable to broadband Internet service? <ul style="list-style-type: none"> ○ If yes, what specific service quality metrics and standards, reporting requirements, and enforcement framework should the Commission adopt? • Should the Commission adopt a wireless mapping standard and require wireless carriers to provide coverage maps? • Are wireless devices accessible and compatible with accessibility equipment? • What service quality metrics and reporting requirements should apply to hybrid Mobile Virtual Network Operators? <p>The party’s explanation of how it plans to avoid duplication of effort with other parties:</p>

TURN anticipates collaborating and coordinating with other consumer advocates or public interest parties that participate in this proceeding to the extent that our interests align. Such coordination and collaboration may include the preparation of joint filings, collaboration on issue areas relevant to TURN and other parties, or coordination between parties for each to focus on certain issues in their respective filings. Where overlap on issues may occur, TURN will work to provide a distinct analysis by developing a position or presenting material that complements or supplements the work of other parties.

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).

Because the Commission has not released a final scope or schedule for this proceeding, TURN’s anticipated participation and time commitments are an estimate. TURN plans on fully participating in this proceeding, including responding to future opportunities to file comments or briefs, participation in workshops, if scheduled, participating in discovery, if needed, and commenting on the Commission’s proposed decisions. TURN’s itemized estimate provided below is preliminary, given the to-be-finalized scope and schedule.

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				
Alexandra Green, TURN Attorney	100	\$300	\$30,000	
Kori Cordero, TURN Managing Attorney	30	\$540	\$16,200	
Regina Costa, TURN Telecom. Policy Director	130	\$795	\$103,350	
Leo Fitzpatrick, TURN Telecom. Policy Analyst	50	\$360	\$18,000	
<i>Subtotal: \$</i>				
OTHER FEES				
[Person 1]				
[Person 2]				
<i>Subtotal: \$</i>				
COSTS				
[Item 1]				
[Item 2]				
<i>Subtotal: \$</i>				
TOTAL ESTIMATE: \$				

Estimated Budget by Issues:

Budget Allocation by Issue	% of Time	Budget
Are there any existing service quality metrics that should be extended to wireless voice services?	24.0%	\$ 40,212

Should the Commission modify any of the existing service quality metrics and standards or develop new service quality standards and reporting requirements applicable to wireless voice services? Are there reporting requirements or metrics that the Commission should not mandate?	24.0%	\$ 40,212
What service quality metrics and reporting requirements should apply to voice over fixed wireless?	14.0%	\$ 23,457
Do the wireline service quality requirements sufficiently fulfill the requirements of Public Utilities Code Section 2899 and address the unique needs of IPCS end users?	12.0%	\$ 20,106
Should the Commission adopt service quality metrics and standards and reporting requirements applicable to broadband Internet service?	14.0%	\$ 23,457
Should the Commission adopt a wireless mapping standard and require wireless carriers to provide coverage maps?	5.0%	\$ 8,378
Are wireless devices accessible and compatible with accessibility equipment?	3.0%	\$ 5,027
What service quality metrics and reporting requirements should apply to hybrid Mobile Virtual Network Operators?	4.0%	\$ 6,702
Total	100.0%	\$ 167,550

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 ½ 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)
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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))	<input type="checkbox"/>
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))	<input type="checkbox"/>
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"/>
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)). Commission’s finding of significant financial hardship made in proceeding number: A.25-03-015 Date of Administrative Law Judge’s Ruling (or CPUC Decision) in which the finding of significant financial hardship was made: July 8, 2025	<input checked="" 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:	

**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
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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,

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"/>
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

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).