

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



Order Instituting Rulemaking to Advance
Demand Flexibility Through Electric Rates.

Rulemaking 22-07-005
(Filed July 14, 2022)

FILED

05/15/26

04:59 PM

R2207005

**APPLICATION FOR REHEARING OF DECISION 26-04-017
BY THE UTILITY CONSUMERS' ACTION NETWORK**



May 15, 2026

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Pursuant to California Public Utilities Code section 1731(b)(1)¹ and Rule 16.1(c)² of the California Public Utilities Commission (Commission) Rules of Practice and Procedure (Rules), the Utility Consumers' Action Network (UCAN)³ submits this Application for Rehearing (AfR) of Commission Decision (D.) 26-04-017, *Decision Granting Compensation to Utility Consumer's Action Network for Substantial Contribution to Decisions (D.) 24-01-032 and (D.) 25-08-049* (the Decision). This application is timely filed within 30 days of April 15, 2026, the date of issuance of the Decision.⁴

I. INTRODUCTION

The Decision correctly finds that UCAN made a substantial contribution to D.24-01-032 and D.25-08-049, that UCAN is an eligible customer, and that UCAN demonstrated significant financial hardship.⁵ The Decision nonetheless reduces UCAN's requested award from \$99,361.60 to \$50,686.41—a cut of nearly forty-nine percent—on grounds that are arbitrary, capricious, and contrary to the intervenor compensation statutes.

The Decision's disallowance for "Excessive Hours – Internal Duplication" (Item 4) imposes a fifty percent (50%) across-the-board cut to *all* non-claim preparatory hours claimed by UCAN's staff attorney Jane Krikorian and expert consultant Samuel Golding for 2023, 2024, and 2025.⁶ The stated rationale — that the hours spent on "internal coordination" were excessively duplicative — is, by its terms, limited to a single category of work. Yet UCAN's line-item

¹All statutory references are to the California Public Utilities Code unless otherwise specified.

²Cal. Code Regs., tit. 20, § 16.1, subd. (c).

³UCAN is a 501(c)(3) non-profit public benefit corporation dedicated to protecting and representing the interests of residential and small business customers in the San Diego Gas & Electric service territory. UCAN has been active in Commission proceedings since 1983.

⁴§ 1731, subd. (b)(1); Cal. Code Regs., tit. 20, § 16.1, subd. (a).

⁵Decision at 1–2.

⁶Decision at 22–23 (Item 4).

timesheets show that only 28.67 hours (approximately eleven percent of the 262.17 substantive hours claimed) are categorized as “Internal Correspondence & Analysis.”⁷ The table below provides UCAN’s hourly totals by category as submitted for reference:

Allocation of Hours by Issue	Hours	Share
Admin & Procedural Tasks	2.25	1%
Internal Correspondence & Analysis	28.67	11%
Reviewing & Analyzing Materials	87.25	33%
Participation in Meetings	80.25	31%
Preparing Comments	61.50	23%
Preparing Data Requests / Responses	2.25	1%
Total	262.17	100%

Applying a 50% reduction to the remaining 89% of hours outside of Internal Correspondence & Analysis — covering reviewing and analyzing materials, attending Commission proceedings and workshops, preparing comments, and responding to data requests — has no basis in the rationale the Commission articulated and is, on its face, arbitrary and capricious.

The Decision compounds this error with three factual mischaracterizations of UCAN’s timesheets that this Application asks the Commission to correct on rehearing. *First*, the Decision asserts that UCAN’s timesheets reflect “frequent communications to discuss issues already addressed in prior exchanges” and “numerous emails, phone calls, and internal discussions between staff regarding the same subject matter, often on the same day, without a clear demonstration that such coordination produced unique or substantive work product.”⁸ The record refutes that characterization: almost every time sheet entry in the Internal Correspondence & Analysis category is tied to a discrete external event (an upcoming filing deadline, an ALJ ruling, a workshop, or a Proposed Decision), and the entries do not repeat one another’s subject matter. *Second*, the Decision asserts that UCAN’s timesheets reflect “repeated internal reviews of each other’s materials” and “editing each other’s work.”⁹ The time sheet entries refute this: under the Preparing Comments category, Mr. Golding drafted seventeen separate filings for UCAN; Ms. Krikorian recorded only three editorial passes on those drafts, totaling under 2.5 hours. There is

⁷Intervenor Compensation Claim of Utility Consumers’ Action Network (filed Oct. 27, 2025) (ICOMP Claim), Part III.A.c (Allocation of Hours by Issue) at 21.

⁸Decision at 22.

⁹Decision at 22, 25.

no record support for the notion that UCAN’s attorney and consultant repeatedly reviewed each other’s work product. *Third*, in responding to UCAN’s Opening Comments on the Proposed Decision (PD Comments), the Decision asserted at page 25 — for the first time and outside of Part III.D — that UCAN’s “internal staff” activities that were deemed excessively duplicative included “attending workshops.”¹⁰ That assertion is also contradicted by the timesheets, which show that of the thirty-five meetings in the proceeding attended by UCAN, Mr. Golding and Ms. Krikorian only jointly attended two meetings — which were the final two meetings, and were directly preceded by UCAN’s drafting and submittal of comments on the topics covered at the meetings.

In short, because UCAN’s staff attorney (Ms. Krikorian) and expert consultant (Mr. Golding) spent an average of approximately 2.6 hours per month coordinating internally (a total of 28.67 hours), jointly attended two critical meetings together (13.83 hours), and minimally collaborated on drafting three filings (2.5 hours on Ms. Krikorian’s part) — a total of 45 hours — the Decision disallowed 50% of the entire 262.17 hours recorded by Ms. Krikorian and Mr. Golding across all categories and issues — a total of nearly 130 hours.

These reductions are not technicalities. Together, they reflect a disallowance disconnected from record findings; an abuse of discretion, a failure to proceed in the manner required by law, and a set of findings unsupported by substantial evidence. Recently, in D.25-03-030, the Commission corrected an analogous situation in another intervenor compensation decision by *limiting* a percentage reduction to the specific hours implicated by the stated rationale, rather than spreading it across all hours.¹¹ The same principle, at a minimum, requires modification here.

Accordingly, UCAN respectfully requests rehearing and the following relief: *primary relief*, that the Commission vacate the 50% reduction imposed on the non-claim preparation hours of Ms. Krikorian and Mr. Golding under Item 4 in its entirety and adjust UCAN’s compensation accordingly; or, in the *alternative*, that the Commission limit any reduction under Item 4 to the hours categorized as Internal Correspondence & Analysis (28.67 hours), so that the disallowance is not misapplied to the 89% of UCAN’s substantive hours across all other categories of activities.

¹⁰Decision at 25.

¹¹D.25-03-030, Order Modifying D.24-09-048 and Denying Rehearing of the Decision, as Modified (issued March 14, 2025), at 6–7.

II. STANDARD OF REVIEW

Rule 16.1(c) requires an application for rehearing to “set forth specifically the grounds on which the applicant considers the order or decision of the Commission to be unlawful or erroneous.”¹² The purpose of an AfR is to alert the Commission to factual and legal error so that the Commission may correct it expeditiously.¹³

UCAN submits this AfR on the grounds that the challenged portions of the Decision are arbitrary and capricious, constitute an abuse of discretion, fail to proceed in the manner required by law, and rest on findings unsupported by substantial evidence.¹⁴ The Commission abuses its discretion—and acts arbitrarily and capriciously—when it “exceeds the bounds of reason.”¹⁵ It fails to proceed in the manner required by law when it takes actions which contradict legislative directives¹⁶ or “fail[s] to comply with required procedures, appl[ies] an incorrect legal standard, or commit[s] some other error of law.”¹⁷ The Commission’s failure to follow its own rules constitutes a failure to proceed as required by law and, if prejudicial, invalidates the decision.¹⁸

Findings are required by section 1705 and must be supported by substantial evidence in light of the whole record.¹⁹ Evidence is not “substantial” unless it is “reasonable, credible, and of solid value,” and conclusions or assumptions not supported by record evidence cannot satisfy that standard.²⁰ A disallowance imposed without identification of any specific time entry alleged to be unreasonable, and without engagement with the affirmative record showing efficiency, is arbitrary and capricious on its face.

III. THE INTERVENOR COMPENSATION STATUTES REQUIRE FULL COMPENSATION FOR REASONABLE TIME EXPENDED

Section 1803 mandates that the Commission “shall award reasonable advocate’s fees, reasonable expert witness fees, and other reasonable costs of preparation for and participation in a hearing or proceeding” to any customer that (i) complies with section 1804, (ii) makes a substantial

¹²Cal. Code Regs., tit. 20, § 16.1, subd. (c).

¹³Ibid.

¹⁴§ 1757, subd. (a).

¹⁵San Pablo Bay Pipeline Co. LLC v. Public Utilities Com. (2013) 221 Cal.App.4th 1436, 1460.

¹⁶Southern California Gas Co. v. Public Utilities Com. (1979) 24 Cal.3d 653, 659.

¹⁷Pedro v. City of Los Angeles (2014) 229 Cal.App.4th 87, 99.

¹⁸Southern California Edison Co. v. Public Utilities Com. (2006) 140 Cal.App.4th 1085, 1106.

¹⁹§ 1705; § 1757, subd. (a)(3)–(4).

²⁰Pedro, supra, 229 Cal.App.4th at p. 99.

contribution, and (iii) demonstrates significant financial hardship.²¹ As the Commission has repeatedly recognized, the use of “shall” makes the award mandatory for any customer that meets these requirements.²²

Section 1801.3, subdivision (b), instructs that the intervenor compensation program “shall be administered in a manner that encourages the effective and efficient participation of all groups that have a stake in the public utility regulation process.”²³ That directive is not aspirational; it instructs how the Commission must exercise its discretion when reviewing claims, and it guides the standards the Commission applies and how it applies them in particular cases.

Here, the Decision verified that UCAN satisfied each requirement for compensation under sections 1802–1804: timely filing of the Notice of Intent (NOI) and claim; eligible customer status; significant financial hardship; and substantial contribution to the two decisions identified.²⁴ Under section 1803, the Commission was required to award UCAN all of its reasonable costs of participation. The Commission does retain discretion to disallow time it finds to be unreasonable. But that discretion falls within the statutory framework: disallowances must be supported by substantial evidence, must be connected to specific record findings, and must be administered in a manner that encourages — not chills — effective and efficient participation by ratepayer advocates.²⁵

IV. THE DECISION ERRED IN TREATING EFFICIENT ATTORNEY–EXPERT COLLABORATION AS EXCESSIVE INTERNAL DUPLICATION

A. Necessary Coordination between UCAN’s Staff Attorney and an Independent Consultant is not “Internal Duplication”.

UCAN’s claim covers the work of two individuals occupying distinct and complementary roles: Ms. Krikorian, UCAN’s Staff Attorney, and Mr. Golding, an outside consultant retained for his expertise in demand flexibility, rate design, and the technical and economic foundations of the Working Group proposals. Ms. Krikorian and Mr. Golding do not perform the same work. Their collaboration is not a duplication of one another’s effort; it is the standard model of an attorney–

²¹ § 1803, subds. (a)–(b).

²² D.03-03-031 at 12–14 (“By making the award mandatory for any customer who makes a substantial contribution and meets the financial hardship requirement, the Legislature eliminated any other obstacles to participation, and to compensation for the costs of participation.”).

²³ § 1801.3, subd. (b).

²⁴ Decision at 1–2 (Procedural Issues B.1–16), 25 (Finding of Fact 1).

²⁵ See fn. 19, *supra*; § 1801.3, subd. (b).

expert relationship expected of intervenors making substantive contributions to complex rulemakings.

The Decision’s interpretation of disallowed activities — “reviewing internal documents, having internal discussions, attending workshops, and editing each other’s work”²⁶— describes, almost by definition, *necessary* attorney–expert coordination and communication. The attorney must understand the technical proposals to ensure accurate comments; the expert must understand the procedural and legal rules to ensure the technical analysis comments don’t run afoul of these rules; thus the necessary coordination and communication between attorney and expert. Both must attend workshops to track an evolving record, but not necessarily every workshop together, as occurred in UCAN’s case. And both must review each other’s drafts to ensure the legal and technical analyses coherently come together. To treat these activities as presumptively duplicative is to require small intervenor organizations to operate in a manner unlike any well-functioning and effective advocacy team. It also compromises their ability to produce focused, substantial contributions. The subsections that follow demonstrate that, in addition to being legally incorrect, the Decision’s “duplication” characterization is factually wrong on this record.

B. The Decision’s Reliance on D.12-03-024 Is Misplaced.

The Decision invokes D.12-03-024 at pages 24–25 for the proposition that the Commission disallows “numerous internal communications, review of each other’s documents, working on the same materials, engaging in the same tasks and participating in the same events.”²⁷ But the cited passage of D.12-03-024 addressed a materially different fact pattern: a claim involving *multiple staff in similar roles* duplicating one another’s work on identical tasks. The standard applies to situations where two or more advocates with overlapping responsibilities (for example, two attorneys preparing the same brief, or two experts producing duplicative testimony) perform the same task and bill for it separately.²⁸

That is not UCAN’s case. Ms. Krikorian is the only attorney on the team, and Mr. Golding is the only expert. They occupy distinct, non-overlapping roles. The fact that they communicate with one another—because that communication is the current format by which legal and technical

²⁶Decision at 25.

²⁷Decision at 22, citing D.12-03-024 at 24–25.

²⁸ See D.12-03-024 p.24, fn.15, for examples of time entries from two attorneys for “tasks...that contained elements of inefficiencies.”

analysis becomes a comprehensible intervenor filing—is not duplication within the meaning of D.12-03-024. The Commission’s reliance on D.12-03-024 to support a categorical reduction across the work of two non-overlapping team members is a misapplied application of the legal standard.²⁹

C. The Record Affirmatively Demonstrates That Each Internal Coordination Entry Was Brief, Deadline-Oriented, and Tied to a Distinct Substantive Output.

UCAN bears the burden of demonstrating that its claimed hours are reasonable.³⁰ The detailed time entries attached to UCAN’s claim and its explanations of reasonableness in Part III.A (a & b) effectively satisfy this obligation. UCAN’s detailed time entries and thorough explanations also constitute a record that refutes each of the Decision’s factual assertions.

The Decision’s central factual assertion is that UCAN’s timesheets reflect “numerous internal reviews of each other’s materials and frequent communications to discuss issues *already addressed in prior exchanges*” and “numerous emails, phone calls, and internal discussions... *without a clear demonstration that such coordination produced unique or substantive work product.*”³¹ These assertions are contradicted by the record. Appendix B, Table B-1, provides a chronological listing of every entry categorized as Internal Correspondence & Analysis for Ms. Krikorian and Mr. Golding. The pattern visible in those tables refutes the Decision’s assertions in four respects.

First, the entries are short. Across the combined list of 53 entries, the median entry is approximately 0.50 hours (30 minutes), and a substantial portion of Mr. Golding’s entries are 0.08 hours (five minutes), reflecting Mr. Golding’s practice of recording the time he spent forwarding a key document or flagging a procedural development to Ms. Krikorian.³² These are not “frequent communications to discuss issues already addressed”; they are quick, targeted contacts between the attorney and the consultant in a complex, multi-year rulemaking.

Second, practically every entry is anchored to a discrete external event with a specific date or deadline. The descriptions in the timesheets speak for themselves: “Phone call w/ Samuel Golding re: *Comments due 8/25*”; “Phone call w/ Samuel Golding re: *Comments and strategy for Reply Comments due Oct 9th*”; “Phone call w/ Samuel Golding re: *working group report Comments due Nov 13th*”; “Conference call w/ expert Samuel Golding re: *PD on expanding*

²⁹Pedro, *supra*, 229 Cal.App.4th at p. 99.

³⁰§ 1804, subd. (c).

³¹Decision at 22 (emphasis added).

³²See Appendix B, Table B-1.

pilots”; “Conference call w/ expert Samuel Golding re: *ALJ Ruling from Apr 24th asking for Comments on WG 1 proposal and Issue 5.*”³³ Each entry corresponds to an identifiable filing deadline, ruling, or Commission event.

Third, many of Mr. Golding’s coordination entries are not internal “discussions” at all, but *transmittals* of substantive information that Mr. Golding identified through his own monitoring of the broader regulatory landscape. For example, on October 3, 2023, Mr. Golding billed 0.08 hours (5 minutes) to “Email to Jane flagging IOU LMS compliance plans in CEC docket 23-LMS-01,” and another 0.08 hours to “Email to Jane flagging PG&E’s misrepresentation of UCAN comments re: hourly retail transmission pricing examples in LMS plans.”³⁴ On September 29, 2023, he billed 0.33 hours to forward and explain the implications of a same-day ALJ ruling extending working group deadlines.³⁵ On June 12, 2024, Ms. Krikorian billed 0.25 hours to email Mr. Golding regarding SDG&E’s marginal-cost settlement agreement to use for comparison in UCAN’s reply comments.³⁶ These are not duplicative “internal discussions”; they are the mechanism by which Mr. Golding’s technical expertise was incorporated into UCAN’s comments. They are exactly the kind of efficient, substance-producing coordination that section 1801.3, subdivision (b) directs the Commission to encourage.

Fourth, the entries are paired and traceable to substantive output. For nearly every coordination call Ms. Krikorian recorded, Mr. Golding recorded a matching entry on the same date with a matching subject description.³⁷ That symmetry, far from indicating duplication, demonstrates the opposite: each call is a single, contemporaneously recorded event. And each grouping of coordination entries can be followed in the record to a corresponding UCAN filing—e.g., the August 2023 grouping of WG informal comment entries precedes UCAN’s informal comments on Working Group 1 and Working Group 2 proposals; the October 2023 grouping precedes UCAN’s reply comments on the pilot expansion; the November–December 2023

³³ICOMP Claim, Krikorian timesheet entries dated 8/16/2023, 9/25/2023, 11/2/2023, 12/20/2023, 5/13/2024 (emphasis added).

³⁴ICOMP Claim, Golding timesheet entries dated 10/3/2023.

³⁵ICOMP Claim, Golding timesheet entry dated 9/29/2023.

³⁶ICOMP Claim, Krikorian timesheet entry dated 6/12/2024.

³⁷ Compare, e.g., Krikorian entry of 9/25/2023 (“Phone call w/ Samuel Golding re: Comments and strategy for Reply Comments due Oct 9th,” 0.67 hours) with Golding entry of 9/25/2023 (“Call w/ Jane re: opening comments re: pilot expansions,” 0.67 hours). See Appendix B, Table B-1.

grouping precedes UCAN’s reply comments on the WG report; the May–June 2024 grouping precedes UCAN’s comments on the ALJ’s April 24 Track B/Issue 5 Ruling, and so on.

Lastly, and taking into consideration the full timesheets provided for reference in Appendix A, where Ms. Krikorian and Mr. Golding had more than one coordination touch concerning preparation of the same UCAN deliverable, their entries show substantial intervening review and analysis between those touches. Even where two calls bear similar descriptions, the record does not support the contention that they were “discussing issues already addressed in prior exchanges.” For example, the paired September 25, 2023 calls re: “Comments and strategy for Reply Comments due Oct 9th” and the paired October 6, 2023 calls re: “Reply Comments on expanding existing pilots” relate to the same UCAN reply comments due October 9, 2023. But between those two sets of calls, Mr. Golding billed approximately 7 hours to review PG&E and SCE’s expanded pilot proposals and opening comments (9/27), to participate in the PG&E webinar on revised pilot proposals (9/29), to review the ALJ ruling directing PG&E, SCE, and CCAs to submit pilot proposal budgets and allowing for additional reply comments (issued and reviewed on 10/3), to undertake an initial review of the IOU LMS compliance plans (10/3), and to review opening comments on pilot expansions (10/3 and 10/6), while Ms. Krikorian, in turn, spent approximately 4.75 hours attending PG&E’s pilot-expansion presentation (9/29) and reviewing other parties’ opening comments to inform UCAN’s reply comments (10/4 and 10/6).³⁸ The October 6, 2023 coordination calls were necessary to align UCAN’s reply-comment strategy with this substantial new record — and ruling expanding the procedural process and schedule — not to revisit ground already covered. The same pattern holds throughout the proceeding: the call-paired entries that the Decision treats as redundant are, on the record, separated by hours of independent review and analysis that necessitate further alignment between the attorney and the consultant.

On this record, the Decision’s description of UCAN’s coordination as “frequent communications to discuss issues already addressed in prior exchanges” and “numerous emails, phone calls, and internal discussions... without a clear demonstration that such coordination produced unique or substantive work product” is factually incorrect. UCAN has not only met its burden to show that its hours were reasonable; the record affirmatively shows that the coordination was efficient: it consisted of brief, deadline-oriented, substance-producing contacts between an

³⁸ See Appendix A, Table A-1, Golding timesheet entries dated 9/27/2023, 9/29/2023, 10/3/2023, and 10/6/2023 & Krikorian timesheet entries dated 9/29/2023, 10/4/2023, and 10/6/2023.

attorney and an expert in distinct roles. The Decision identifies no specific entry as duplicative or unproductive, and conclusory recitals that do not engage with the record do not constitute substantial evidence.³⁹

D. Spending Approximately 2.6 Hours per Month on Internal Coordination is Efficient — not Excessive.

Appendix B, Table B-2 shows the hours UCAN spent on internal coordination and all other issues on a monthly basis. Over the proceeding’s 35-month window, UCAN recorded hours spent on internal coordination in 11 separate months. The time spent for Ms. Krikorian and Mr. Golding’s internal coordination averages approximately 2.6 hours across these months, and in months without imminent filing deadlines, coordination hours are essentially zero. This cannot credibly be characterized as excessive internal coordination; it is the pattern one would expect of an efficient attorney–expert team that connects only when a deadline or an external development requires alignment, and otherwise works independently.

E. The Decision’s Assertion That UCAN’s Staff “Review[ed] Each Other’s Materials” and “Edit[ed] Each Other’s Work” Excessively Is Contradicted by UCAN’s Time Entries.

The Decision asserts that UCAN’s timesheets reflect “repeated internal reviews of each other’s materials”⁴⁰ and that UCAN’s internal staff engage in excessively “editing each other’s work.”⁴¹ The Preparing Comments category is where the Commission would find evidence of such reviewing and editing if it existed. The record shows the opposite.

In the Preparing Comments category, Mr. Golding recorded sixteen entries spanning the proceeding’s major filings—including outlines, initial drafts, finalizations, and submittals of UCAN’s opening and reply comments on the pilot expansion, the Working Group Report, the ALJ’s April 24, 2024 Ruling, and the final Proposed Decision.⁴²

Ms. Krikorian, by contrast, has only *three* Preparing Comments entries: a September 25, 2023 entry “Writing UCAN’s Comments on ALJ’s Ruling re: Staff Proposal to Extend Pilots” (1.25 hours), in which she helped to draft UCAN’s opening comments on the pilot expansion with

³⁹Pedro, *supra*, 229 Cal.App.4th at p. 99 (evidence “based upon conclusions or assumptions not supported by evidence in the record” does not constitute substantial evidence).

⁴⁰Decision at 22.

⁴¹Decision at 25.

⁴²See Appendix B, Table B-3 (Preparing Comments).

Mr. Golding; an October 25, 2023 entry “Making substantial edits to final draft of Comments on ALJ Ruling 8/15/23” (0.50 hours); and an August 14, 2025 entry “Review and comments on draft Opening Comments on PD emailed to expert Samuel Golding” (0.67 hours).⁴³ Across the entire proceeding, Ms. Krikorian’s editorial review of Mr. Golding’s sixteen draft filings totaled approximately 1.17 hours (the 10/25/2023 and 8/14/2025 entries). That is well under five percent of Mr. Golding’s drafting time on those filings.

Appendix B, Table B-3 contains the time entries described above, excerpted from UCAN’s timesheets, for ease of reference.

Two conclusions follow. *First*, there is no record evidence of “repeated internal reviews of each other’s materials.” Materials moved in essentially one direction: Mr. Golding drafted, Ms. Krikorian reviewed. There is no reciprocal pattern of iterative review or back-and-forth editing. *Second*, far from being “excessive,” Ms. Krikorian’s editorial time was unusually efficient. It was made possible precisely because of the brief, deadline-anchored phone calls and emails recorded in the Internal Correspondence & Analysis category, which aligned Mr. Golding’s drafting with UCAN’s positions before he committed time to a draft. The internal coordination the Decision singles out is what *made possible* the otherwise notable efficiency the Preparing Comments entries reflect: Ms. Krikorian was able to review and approve Mr. Golding’s drafts with minimal editorial time because UCAN’s positions were already aligned through prior, targeted coordination.

This is the opposite of excessive duplication. It is the model of efficient division of labor that section 1801.3 directs the Commission to encourage. The Decision’s contrary characterization of UCAN’s timesheets as reflecting “repeated internal reviews of each other’s materials” and excessively “editing each other’s work” is unsupported by the record and cannot satisfy the substantial-evidence standard.⁴⁴

F. The Decision’s Assertion That Mr. Golding and Ms. Krikorian Duplicated Each Other by Attending Workshops Is Contradicted by the Record and Was Improperly Raised for the First Time in Response to PD Comments.

In responding to UCAN’s Comments on the Proposed Decision, the Final Decision broadened the rationale for Item 4 by asserting that UCAN’s “internal staff” activities “involve

⁴³See Appendix B, Table B-3.

⁴⁴Pedro, *supra*, 229 Cal.App.4th at p. 99.

activities such as reviewing internal documents, having internal discussions, *attending workshops*, and editing each other’s work.”⁴⁵

The inclusion of “attending workshops” as a basis for the disallowance is new. It does not appear in Part III.D, where the disallowance is detailed.⁴⁶ UCAN therefore had no opportunity to address this new basis through comments on the Proposed Decision. Raising a new factual ground for disallowance for the first time in the Commission’s response to comments on the Proposed Decision—after the close of party comment—deprives UCAN of fair notice and constitutes a failure to proceed in the manner required by law.⁴⁷

Additionally, the new assertion is not supported by the record. The Commission’s statement implies that Ms. Krikorian and Mr. Golding attended workshops together and thereby duplicated each other’s effort. The timesheets show the opposite: Mr. Golding attended only *the final three* meetings in the Participation in Meetings category over the proceeding’s entire substantive window, while Ms. Krikorian attended *thirty-four* (primarily the working group meetings themselves and related sessions).⁴⁸ Ms. Krikorian and Mr. Golding were *jointly* present at only *the final two* meetings — the September 29, 2023 PG&E pilot webinar and the October 17, 2023 Energy Division-led workshop on the Working Group Proposals — both of which were directly preceded by UCAN’s drafting and submission of comments regarding proposed pilot expansions and the Working Group proposals.

This division of labor is precisely what UCAN explained in its original claim: “UCAN representative Jane Krikorian attended the majority of these meetings in order to monitor the proceeding procedurally and flag issues for UCAN expert Samuel Golding. Mr. Golding attended certain WG meetings in order to analyze proposals from the Joint IOUs, Microgrid RC and Energy Division Staff and provide substantial comments.”⁴⁹ The timesheets bear this out: Ms. Krikorian’s 34 meeting entries are dominated by the recurring biweekly working group sessions (WG 1 and WG 2), tracked for procedural matters and issue identification; Mr. Golding’s three meeting entries are the targeted events at which his technical analysis was most needed (the pilot expansion workshop on August 24, the PG&E pilot webinar on September 29, and the WG Proposals

⁴⁵Decision at 25 (emphasis added).

⁴⁶Compare Decision at 22–23 (Item 4 rationale) with Decision at 25 (page-25 response).

⁴⁷Southern California Edison Co., *supra*, 140 Cal.App.4th at p. 1106.

⁴⁸ICOMP Claim, timesheets categorized as “Participation in Meetings.” See Appendix B, Table B-4.

⁴⁹ICOMP Claim, Part III.A (description of allocation of meeting attendance between Krikorian and Golding).

workshop on October 17, 2023). Mr. Golding’s separate role is also reflected in the Reviewing & Analyzing Materials category, where he billed four entries to review the recordings and transcripts of selected prior working group meetings rather than attending those meetings in real time: “Review of 7/21 WG1 meeting recording & transcript” (1.92 hours); “Review and notations re: 7/28 WG2 meeting recording & transcript” (1.92 hours); “Review and notations re: 7/14 WG2 meeting recording & transcript” (1.92 hours); and “Review and notations re: 7/17 WG1 meeting recording & transcript” (2.00 hours).⁵⁰ Appendix B, Table B-4 contains the time entries described above, excerpted from UCAN’s timesheets, for ease of reference.

UCAN provided Mr. Golding with written notes regarding prior WG meetings,⁵¹ and considered it necessary for him to review only four of the many prior meetings in this category to support his substantive technical input. This is the opposite of duplication. It reflects deliberate, *selective* allocation by Ms. Krikorian of Mr. Golding’s time to review the meetings deemed to be most relevant to his contribution.

On these facts, “attending workshops” cannot support the Item 4 disallowance. The record shows that Ms. Krikorian and Mr. Golding only jointly attended the final two meetings in this proceeding (out of thirty-five total meetings), which were additionally directly relevant to the subsequent preparation and submittal of comments by UCAN. The Decision’s assertion that workshop attendance constitutes internal duplication is unsupported by substantial evidence and is arbitrary and capricious on this record.⁵²

V. THE DECISION ARBITRARILY APPLIES A 50% REDUCTION TO ALL OF MS. KRIKORIAN’S AND MR. GOLDING’S NON-CLAIM PREPARATION HOURS

A. The 50% Reduction Is Mathematically and Logically Disconnected From the Stated Rationale and Is Arbitrary on Its Face.

The Decision’s stated rationale for Item 4 is that “a decent portion of the hours claimed by Jane Krikorian and Samuel Golding were spent on internal coordination,” that “the timesheets document numerous emails, phone calls, and internal discussions between staff,” and that some of

⁵⁰ICOMP Claim, Golding timesheet entries dated 8/24/2023 (two entries) and 8/25/2023 (two entries). See Appendix B, Table B-4.

⁵¹ICOMP Claim, Krikorian timesheet entry dated 8/17/23 (“Emailing Samuel Golding w/ WG 2 summaries for Comments due 8/25”). See Appendix B, Table B-1.

⁵²Pedro, *supra*, 229 Cal.App.4th at p. 99.

this “internal coordination” did not produce “unique or substantive work product.”⁵³ The rationale is, by its own terms, *internal coordination*. Yet the Decision applies a 50% cut to *every* hour Ms. Krikorian and Mr. Golding recorded in 2023, 2024, and 2025—including hours spent reviewing the IOUs’ filings, attending workshops, preparing comments, and responding to data requests.⁵⁴

Only 28.67 hours — approximately eleven percent of the substantive hours — were categorized as Internal Correspondence & Analysis in UCAN’s request. That is the universe of hours implicated by the Decision’s rationale. Applying a 50% reduction to the remaining 89% of hours is mathematically and logically disconnected from the stated basis for the disallowance. It is arbitrary and capricious on its face and exceeds the bounds of reason.⁵⁵

B. Commission Precedent in D.25-03-030 Requires That Any Reduction Be Limited to the Hours Implicated by the Stated Rationale.

Just over one year ago, the Commission addressed an analogous situation on rehearing of D.24-09-048. There, the Commission had applied an additional 5% across-the-board reduction to *all* of an intervenor’s non-claim-preparation hours on a rationale that addressed only the evidentiary hearings, which comprised 64% of the hours.⁵⁶ On rehearing the Commission expressly limited the 5% reduction to the 64% of hours implicated by the rationale:

“We uphold the statements in the Decision as to why an additional 5% reduction is warranted based on PCF’s unproductive and unnecessary participation as reflected in its testimony and during evidentiary hearings. ... However, *we agree that the rationale for the 5% reduction applies only to the time spent on the evidentiary showing. Therefore, we modify the Decision to apply the additional 5% reduction only to the 64% of PCF’s non-claim preparation hours spent on testimony and the evidentiary hearing rather than to all hours.*”

D.25-03-030 at 6–7 (emphasis added).

The same principle applies here. The Decision’s rationale for Item 4 is, on its face, limited to “internal coordination,” just as the rationale in D.24-09-048 was limited to evidentiary-hearing hours. Upon rehearing, D.25-03-030 required that the reduction be limited to the category of hours implicated by the rationale. This recent precedent supports UCAN’s alternative request that any

⁵³Decision at 22.

⁵⁴Decision at 22–23 (table reducing Krikorian and Golding hours by 50% across all years and categories).

⁵⁵San Pablo Bay, supra, 221 Cal.App.4th at p. 1460.

⁵⁶D.25-03-030 at 6.

reduction be applied only to the hours categorized as Internal Correspondence & Analysis hours (28.67 hours).

VI. THE REDUCTION CHILLS EFFECTIVE AND EFFICIENT PARTICIPATION CONTRARY TO SECTION 1801.3

Section 1801.3, subdivision (b) directs that the article “shall be administered in a manner that encourages the effective and efficient participation of all groups that have a stake in the public utility regulation process.”⁵⁷ A 50% reduction applied across the entire work product of a small intervenor’s attorney–expert team — on the rationale that they communicated with one another — cuts directly against that statutory directive. The IOUs are represented by departments of attorneys, in-house experts, and outside consultants who consult freely and frequently without any obligation to record or justify their internal coordination. To impose punitive cuts on a two-person ratepayer-advocate team for engaging in the same routine and necessary coordination is precisely the kind of double standard that discourages effective participation.

UCAN raised this concern in its Comments on the Proposed Decision.⁵⁸ The Final Decision does not respond to the policy directive of section 1801.3, subdivision (b), beyond reciting that the Commission “awards compensation for efficient efforts.”⁵⁹ Where, as here, a categorical reduction is applied to efficient, necessary coordination between an attorney and an expert in a complex rulemaking that lasted nearly three years, the Commission has not administered the code in a manner that encourages effective and efficient participation — and has therefore failed to proceed in the manner required by law.

VII. CONCLUSION

The Decision’s 50% across-the-board reduction to Ms. Krikorian’s and Mr. Golding’s hours under Item 4 is arbitrary and capricious, constitutes an abuse of discretion, fails to proceed in the manner required by law, and rests on findings unsupported by substantial evidence.⁶⁰ The Decision mischaracterizes efficient attorney–expert collaboration as internal duplication; it mischaracterizes the record as reflecting “frequent communications to discuss issues already addressed in prior exchanges,” “repeated internal reviews of each other’s materials,” and “editing

⁵⁷§ 1801.3, subd. (b).

⁵⁸UCAN Comments on Proposed Decision at 3–4 (Sections II.B.1 and II.B.2).

⁵⁹Decision at 25.

⁶⁰§ 1757, subd. (a).

each other’s work,” when the timesheets show none of these things; and it invokes for the first time on page 25 — without notice to UCAN — the additional rationale that joint workshop attendance represented excessive internal duplication, a characterization affirmatively refuted by the meeting-attendance record. The disallowance also fails to comply with the common-sense principle the Commission itself adopted on rehearing in D.25-03-030: that a percentage reduction must be limited to the category of hours implicated by the stated rationale.

Accordingly, UCAN respectfully requests that the Commission grant rehearing of Decision 26-04-017 and modify the Decision as follows:

(1) *Primary relief.* Vacate the 50% reduction of non-claim preparation hours of Ms. Krikorian and Mr. Golding for 2023, 2024, and 2025 imposed under Item 4 (“Excessive Hours – Internal Duplication”) in its entirety and adjust UCAN’s compensation accordingly.

(2) *Alternative relief.* In the alternative, and consistent with the principle adopted on rehearing in D.25-03-030, limit any reduction imposed under Item 4 to Internal Correspondence & Analysis hours only (28.67 hours) so that the disallowance is not misapplied to reduce other categories of effort.

(3) *Conforming modifications.* Make any conforming modifications to the Decision’s findings of fact, conclusions of law, and ordering paragraphs necessary to give effect to the primary or alternative relief, including updating the “Awarded” amount and the per-utility allocation table accordingly.

These modifications are required to bring the Decision into conformity with sections 1801.3, 1803, 1804, and 1757; with the Commission’s own rehearing precedent in D.25-03-030; and with the substantial-evidence standard applicable to Commission findings. UCAN appreciates the Commission’s consideration of this Application.

Respectfully submitted,
/s/ Jane Krikorian
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Dated: May 15, 2026

APPENDIX A
UCAN TIMESHEETS
Table A-1. UCAN Timesheets — Jane Krikorian

R.22-07-005-Utility Consumers' Action Network's Timesheet						
POC	YEAR	DATE	ISSUE	CATEGORY	TASK	HOURS
UCAN Attorney Jane Krikorian						
JANE	2022	12/9/2022	WG	Participation in Meetings	Attend Working Group (WG) kick-off meeting to establish guidelines and goals for WG 1 and WG 2	1.50
JANE	2023	1/6/2023	WG	Participation in Meetings	Attending WG 1 Mtng 1 - Track B Issue 3: guidelines for all demand flexibility rate design applications	2.00
JANE	2023	1/10/2023	WG	Participation in Meetings	Attending Residential Rate Summit on TOU transitioning grid of the future	3.50
JANE	2023	1/13/2023	WG	Participation in Meetings	Attending WG 2 Mtng 1 - tour of Market Informed Demand Automation Server (MIDAS); "Prices to Devices"	2.00
JANE	2023	1/20/2023	WG	Participation in Meetings	Attending WG 1 Mtng 2- how wholesale rates could be incorporated into demand flexibility rates	2.00
JANE	2023	1/25/2023	WG	Reviewing & Analyzing Materials	Reading email w/ agenda and view SharePoint slides for mtng 2	0.75
JANE	2023	1/27/2023	WG	Participation in Meetings	Attending WG 2 Mtng 2 - Price Machine Proposal; review ED CalFUSE systems; PGE presentation - implementing dynamic rates	2.00
JANE	2023	2/2/2023	WG	Reviewing & Analyzing Materials	Reading LBNL In elastic Dynamic Price Study for WG1 meeting tomorrow	1.00
JANE	2023	2/3/2023	WG	Participation in Meetings	Attending WG 1 Mtng 3 - reviewing LBNL Inelastic Dynamic Price Study; how subscriptions alleviat price volality	2.00
JANE	2023	2/10/2023	WG	Participation in Meetings	Attending WG 2 Mtng 3 - reviewing more specifics on Price Machine for dynamic rates and upcoming proposals	2.00
JANE	2023	2/17/2023	WG	Participation in Meetings	Attending WG 1 Mtng 4 - exploring what real time prices should recover	2.00
JANE	2023	2/24/2023	WG	Participation in Meetings	Attending WG 2 Mtng 4 - reviewing core functions of Price Machine proposals	2.00
JANE	2023	3/3/2023	WG	Participation in Meetings	Attending WG 1 Mtng 4- presentations on RTP from Oklahoma gas and electric and Georgia Power	2.00
JANE	2023	3/10/2023	WG	Participation in Meetings	Attending WG 2 Mtng 5 - reviewing MIDAS, Energy Division and Joint IOU price machine proposals	2.00
JANE	2023	3/17/2023	WG	Participation in Meetings	Attending WG 1 Mtng 5 reviewing marginal cost breakdowns Lawrence Butely Lab Presentation on dynamic pricing bill control tool, SCE on generation pricing	2.00
JANE	2023	4/7/2023	WG	Participation in Meetings	Attending WG 2 Mtng 7 - transactive subscriptions and processes; reviewing 5 different sysyems and processes	2.00
JANE	2023	4/14/2023	WG	Participation in Meetings	Attending WG 1 Mtng 7 - ED Staff Proposal for Guidance for IOU rate design applications for dynamic rates	2.00
JANE	2023	4/21/2023	WG	Participation in Meetings	Attending WG 2 Mtng 8 - Scoping Memo Q4c - understand 3rd party barriers and possible solutions	2.00
JANE	2023	4/28/2023	WG	Participation in Meetings	Attending WG 1 Mtng 8 - E3 presentation: white paper on Rate Design for Energy Division	2.00
JANE	2023	5/5/2023	WG	Participation in Meetings	Attending WG 2 Mtng 9 - still reviewing 3rd party barriers and needs	2.00
JANE	2023	5/12/2023	WG	Participation in Meetings	Attending WG 1 Mtng 9 - Distribution Capacity Pricing; reviewing breakdown of residential rate components	2.00
JANE	2023	5/19/2023	WG	Participation in Meetings	Attending WG 2 Mtng 10 - Review five 3rd party proposals for WG Report	2.00
JANE	2023	6/2/2023	WG	Participation in Meetings	Attending WG 2 Mtng 11-Operational Capabilities of 3rd party and barriers	2.00
JANE	2023	6/9/2023	WG	Participation in Meetings	Attending WG 1 Mtng 11 - Berkeley Energy Institute vs. Kevala numbers; capacity needs on grid; TOU transmission study	2.00
JANE	2023	6/16/2023	WG	Participation in Meetings	Attending WG 2 Mtng 12 Review Price Machine Proposals	2.00
JANE	2023	6/23/2023	WG	Participation in Meetings	Attending WG 1 Mtng 12 LBNL Dynamic Pricing Tool presentation from Denmark Energy Infrastructure presentation	2.00
JANE	2023	6/23/2023	WG	Participation in Meetings	Attending PG&E Dynamic Rate Research presentation	2.00
JANE	2023	6/30/2023	WG	Participation in Meetings	Attending WG 2 Mtng 13 - CCA barriers to dynamic pricing	2.00
JANE	2023	7/7/2023	WG	Participation in Meetings	Attending WG 1 Mtng 13 CCA Presentation in Demand Flexability Rates, Microgrid Resourses, Coalition proposals for Demand Flexability Rate Design	2.00
JANE	2023	7/14/2023	WG	Participation in Meetings	Attending WG 2 Mtng 14 - reviewing party proposals and barriers for 3Ps in offering DF services; timeline for WG Report	2.00
JANE	2023	7/14/2023	WG	Participation in Meetings	Attending WG 1 Supplemental meeting- issues 3 of Track B guidance for DF	2.00
JANE	2023	7/20/2023	WG	Reviewing & Analyzing Materials	Reading WG 1 meeting notes for mtng and proposals	1.00
JANE	2023	7/21/2023	WG	Participation in Meetings	Attending WG 1 Mtng 14 - Reviewing RTP proposal from Joint Utilities, Energy Division, Microgrid Resource Coalition	1.75
JANE	2023	7/28/2023	WG	Participation in Meetings	Attending WG 2 mtng 15 - list of proposals and updates, deadlines, etc.	2.00
JANE	2023	8/4/2023	WG	Participation in Meetings	Attending WG 1 Mtn g 15 - Reviewing ED Staff proposal and guidance for utility DF rate application	1.75
JANE	2023	8/16/2023	WG	Internal Correspondence & Analysis	Phone call w/ Samuel Golding re: Comments due 8/25	0.67
JANE	2023	8/16/2023	WG	Reviewing & Analyzing Materials	Reading and reviewing WG 1 and WG 2 proposals for Comments due 8/25 and for discussion w/ expert Samuel Golding	0.50
JANE	2023	8/17/2023	WG	Reviewing & Analyzing Materials	Reading WG2 January-July notes to inform Comments; compile summary of mtng notes	2.50
JANE	2023	8/17/2023	WG	Internal Correspondence & Analysis	Emailing Samuel Golding w/ WG 2 summaries for Comments due 8/25	0.50
JANE	2023	8/20/2023	WG	Internal Correspondence & Analysis	Phone call w/ Samuel Golding re: WG 1 and WG 2 proposals and Comments due in Sharepoint 8/25 (so not on docket card)	0.58
JANE	2023	8/30/2023	WG	Internal Correspondence & Analysis	Call w/ Samuel Golding re: Working Group process and comments	0.58
JANE	2023	9/6/2023	WG	Reviewing & Analyzing Materials	Reviewing WG 1 proposals and Party Comments	1.00
JANE	2023	9/8/2023	WG	Reviewing & Analyzing Materials	Reading WG 1 Comments and CalFUSE PowerPoint from Energy Division	1.00
JANE	2023	9/11/2023	WG	Reviewing & Analyzing Materials	Reviewing ALJ's Ruling 8/15 w/ attachments A & B on expanding existing pilots and D.21-12-015 that authorized PG&E and SCE dynamic rate pilots	3.50
JANE	2023	9/14/2023	WG	Reviewing & Analyzing Materials	Reading CalFUSE proposal from Energy Division	1.00
JANE	2023	9/19/2023	PILOT	Internal Correspondence & Analysis	Phone call w/expert Samuel Golding re: comments on ALJ Ruling Aug. 15 2023 w/ Energy Division proposal to expand existing pilots - due Sept 25 2023	0.50

JANE	2023	9/21/2023	PILOT	Reviewing & Analyzing Materials	Reviewing ALJ's Ruling w/ Questions on Energy Divisions proposal to expand existing pilots	1.25
JANE	2023	9/22/2023	PILOT	Reviewing & Analyzing Materials	Reviewing ALJ's Ruling w/ Questions on Energy Divisions proposal to expand existing pilots	1.00
JANE	2023	9/22/2023	PILOT	Internal Correspondence & Analysis	Emailing Samuel Golding re: UCAN's concerns about expanding pilots and answering ALJ's questions	0.25
JANE	2023	9/25/2023	PILOT	Internal Correspondence & Analysis	Phone call w/ Samuel Golding re: Comments and strategy for Reply Comments due Oct 9th	0.67
JANE	2023	9/25/2023	PILOT	Reviewing & Analyzing Materials	Reviewing D.21-12-015 on PG&E/SCE pilots	0.75
JANE	2023	9/25/2023	PILOT	Preparing Comments	Writing UCAN's Comments on ALJ's Ruling re: Staff Proposal to Extend Pilots	1.25
JANE	2023	9/28/2023	WG	Reviewing & Analyzing Materials	Reviewing WG SharePoint folder and Joint IOU proposal for Load Flexibility Rates	1.00
JANE	2023	9/29/2023	PILOT	Participation in Meetings	Attending Teams meeting for PG&E presentation on Proposals Expanding Existing Pilots filed w. Comments on 9/25/23 to ALJ's 8/15 Ruling w/ ED's expanding the pilots proposal attached	1.00
JANE	2023	9/29/2023	WG	Reviewing & Analyzing Materials	Reading ALJ's Ruling on deadlines for Track B Working Group proposals Oct 11th w/ dates for Comments Nov 13th and Reply Dec 22nd	0.25
JANE	2023	10/4/2023	PILOT	Reviewing & Analyzing Materials	Reading other Parties Comments on expanding pilots to help write UCAN's Reply Comments due Oct 9th	2.25
JANE	2023	10/6/2023	PILOT	Internal Correspondence & Analysis	Phone call w/ Samuel Golding re: Reply Comments on expanding existing pilots	0.67
JANE	2023	10/6/2023	PILOT	Reviewing & Analyzing Materials	Reading other parties comments for UCAN's reply Comments	1.50
JANE	2023	10/6/2023	WG	Admin & Procedural Tasks	Writing email to Jameel Pueblos at SCE regarding the utility's request to remove portion of UCAN's Comments on WG 1 Joint IOU proposal filed in SharePoint on Aug. 25, 2023	0.75
JANE	2023	10/9/2023	PILOT	Reviewing & Analyzing Materials	Reviewing other parties comments for UCAN's reply comments to confirm accuracy of party positions	2.00
JANE	2023	10/16/2023	PILOT	Reviewing & Analyzing Materials	Reviewing ALJ's 10/3 Ruling for due dates on expanding pilots	0.25
JANE	2023	10/16/2023	WG	Reviewing & Analyzing Materials	Reviewing ALJ's 9/29 Ruling for due dates on WG Proposals	0.25
JANE	2023	10/16/2023	WG	Reviewing & Analyzing Materials	Reading SCE WG report filed October 11th for Workshop on 10/17	2.00
JANE	2023	10/17/2023	WG	Internal Correspondence & Analysis	Phone call w/ expert Samuel Golding re: workshop and UCAN's Comments on WG Proposal due Nov 13	0.25
JANE	2023	10/17/2023	WG	Participation in Meetings	Attending Microsoft teams mtng workshop for WG Proposals	6.00
JANE	2023	10/24/2023	PILOT	Reviewing & Analyzing Materials	Reading SCE and VCE detailed budget detailed budget information for filing on proposal to expand pilots for 10/25 comments	1.00
JANE	2023	10/25/2023	PILOT	Internal Correspondence & Analysis	Phone call w/ Samuel Golding re: final comments on expanding pilots including IOU's budget requests	0.17
JANE	2023	10/25/2023	PILOT	Reviewing & Analyzing Materials	Reading pilot enabling decision D.21-12-015 for original authorized budgets and scope of pilots and reviewing ALJ's Ruling on 8/15 on whether to expand the pilots	1.25
JANE	2023	10/25/2023	PILOT	Preparing Comments	Making substantial edits to final draft of Comments on ALJ Ruling 8/15/23	0.50
JANE	2023	11/2/2023	WG	Internal Correspondence & Analysis	Phone call w/ Samuel Golding re: working group report Comments due Nov 13th	0.50
JANE	2023	11/21/2023	DF RATES	Internal Correspondence & Analysis	Phone call w/ Samuel Golding re: Reply Comments on WG proposals due Dec. 22 2023	0.75
JANE	2023	12/15/2023	PILOT	Reviewing & Analyzing Materials	Reviewing PD on Expanding Pilots	0.50
JANE	2023	12/20/2023	PILOT	Internal Correspondence & Analysis	Conference call w/ expert Samuel Golding re: PD on expanding pilots	0.33
JANE	2023	12/20/2023	DF RATES	Internal Correspondence & Analysis	Phone call w/ Samuel Golding re: reply comments on WG Proposals due Dec. 22 2023	1.00
JANE	2023	12/21/2023	DF RATES	Reviewing & Analyzing Materials	Reading Joint Utilities SEIA and Cal Advocates Comments filed on 11/13 for UCAN's reply comments re: Proposals and transmission rates	1.50
JANE	2024	1/3/2024	PILOT	Reviewing & Analyzing Materials	Reading PD on Expanding the Pilots for possible comments due 1/5/24	1.00
JANE	2024	1/4/2024	PILOT	Internal Correspondence & Analysis	Phone call w/ Samuel Golding re: possible PD Comments and after discussion decided not to file PD Comments	0.58
JANE	2024	1/4/2024	DF RATES	Internal Correspondence & Analysis	Phone call w expert Samuel Golding discussing possible exparte meeting w/ Commission staff and including Travis Kavulla who spoke about transmission issues at the May 26, 2023 WG meeting	0.50
JANE	2024	5/8/2024	DF RATES	Reviewing & Analyzing Materials	Reading ALJ Ruling from 4/24/24 with questions re: Track B WG 1 Proposals and Issue 5	0.50
JANE	2024	5/13/2024	DF RATES	Internal Correspondence & Analysis	Conference call w/ expert Samuel Golding re: ALJ Ruling from Apr 24th asking for Comments on WG 1 proposal and Issue 5	0.83
JANE	2024	6/12/2024	DF RATES	Internal Correspondence & Analysis	Emailing Samuel Golding re: SDG&E's marginal cost settlement agreement for comparison in reply comments	0.25
JANE	2024	6/12/2024	DF RATES	Internal Correspondence & Analysis	Phone call w/ Samuel Golding re: Reply Comments due today on ALJ 4/24/24 Ruling on Track B WG 1 Proposals and Issue 5	0.83
JANE	2024	6/12/2024	DF RATES	Admin & Procedural Tasks	Writing Motion to accept late Reply Comments	0.75
JANE	2025	8/1/2025	DF RATES	Internal Correspondence & Analysis	Call w/ expert Samuel Golding re: Opening Comments on PD	0.50
JANE	2025	8/14/2025	DF RATES	Preparing Comments	Review and comments on draft Opening Comments on PD emailed to expert Samuel Golding	0.67
JANE	2025	8/19/2025	DF RATES	Internal Correspondence & Analysis	Call w/ Samuel Golding re: Reply Comments on PD	0.17
					Total Hours for Jane Krikorian	117.00
Intervenor Compensation Hours						
JANE	2025	9/25/2025	IC	Preparing ICOMP Requests	ICOMP prep	1.50
JANE	2025	9/30/2025	IC	Preparing ICOMP Requests	ICOMP prep	1.00
JANE	2025	10/7/2025	IC	Preparing ICOMP Requests	ICOMP prep	1.00
JANE	2025	10/7/2025	IC	Preparing ICOMP Requests	ICOMP prep	2.25
JANE	2025	10/14/2025	IC	Preparing ICOMP Requests	ICOMP prep	2.00
JANE	2025	10/16/2025	IC	Preparing ICOMP Requests	ICOMP prep	2.00
JANE	2025	10/17/2025	IC	Preparing ICOMP Requests	ICOMP prep	0.75
JANE	2025	10/17/2025	IC	Preparing ICOMP Requests	ICOMP prep	0.50
JANE	2025	10/18/2025	IC	Preparing ICOMP Requests	ICOMP prep	0.50
JANE	2025	10/22/2025	IC	Preparing ICOMP Requests	ICOMP prep	0.50
					Total ICOMP Prep Hours for Jane Krikorian	12.00

Table A-1 (continued). UCAN Timesheets — Samuel Golding

UCAN's Expert Samuel Golding						
SAMUEL	2023	7/20/2023	WG	Admin & Procedural Tasks	Email to SCE, UCAN confirming WG sharepoint access	0.08
SAMUEL	2023	7/20/2023	WG	Reviewing & Analyzing Materials	Initial review of Scoping Memo Ruling and WG sharepoint documentation	1.92
SAMUEL	2023	8/15/2023	WG	Reviewing & Analyzing Materials	Review and notations re: OIR and CPUC staff whitepaper 'Advanced Strategies for Demand Flexibility Management and Customer DER Compensation'	3.67
SAMUEL	2023	8/16/2023	WG	Internal Correspondence & Analysis	Call w/ Jane re: UCAN WG proposal informal comment strategy	0.67
SAMUEL	2023	8/16/2023	PILOT	Reviewing & Analyzing Materials	Initial review of 8/15 ALJ Ruling on expanding pilots	0.67
SAMUEL	2023	8/16/2023	PILOT	Reviewing & Analyzing Materials	Review and notations re: LMS materials (OAL Approval of Revisions to the Load Management Standards in CEC Docket 23-LMS-01, Compliance Assistance for LMS Plan report in CEC-400-2023-009, and LMS Compliance Timeline req.)	4.75
SAMUEL	2023	8/17/2023	WG	Internal Correspondence & Analysis	Review of Jane's email re: WG notes	0.25
SAMUEL	2023	8/19/2023	WG	Reviewing & Analyzing Materials	Review of ED staff WG1 and WG2 comment instructions and templates	0.33
SAMUEL	2023	8/19/2023	WG	Reviewing & Analyzing Materials	Review and notations re: WG1 Joint IOU Proposal and appendices	5.42
SAMUEL	2023	8/19/2023	WG	Reviewing & Analyzing Materials	Review and notations re: WG1 ED Proposal and appendices	2.25
SAMUEL	2023	8/20/2023	WG	Internal Correspondence & Analysis	Call w/ Jane re: UCAN informal WG proposal comment strategy	0.58
SAMUEL	2023	8/21/2023	WG	Reviewing & Analyzing Materials	Review and notations re: WG2 Joint IOU / CCA and ED / TeMix proposals and addendums	3.42
SAMUEL	2023	8/22/2023	WG	Reviewing & Analyzing Materials	Review and notations re: WG2 Third Party Needs proposal	0.67
SAMUEL	2023	8/22/2023	WG	Reviewing & Analyzing Materials	Review and notations re: WG2 MRC proposal	3.25
SAMUEL	2023	8/23/2023	WG	Preparing Comments	Compilation of notes / citations and identification of areas for UCAN comment / additional review or supporting research	2.50
SAMUEL	2023	8/24/2023	WG	Reviewing & Analyzing Materials	Review of 7/21 WG1 meeting recording & transcript	1.92
SAMUEL	2023	8/24/2023	WG	Reviewing & Analyzing Materials	Review and notations re: 7/28 WG2 meeting recording & transcript	1.92
SAMUEL	2023	8/24/2023	PILOT	Participation in Meetings	Remote participation in Pilot Expansion Proposal workshop	1.92
SAMUEL	2023	8/25/2023	WG	Admin & Procedural Tasks	Uploading of UCAN comments to SCE Sharepoint	0.08
SAMUEL	2023	8/25/2023	WG	Admin & Procedural Tasks	Emails to SCE requesting access to additional (>2 mo old) WG2 meeting recordings on sharepoint	0.08
SAMUEL	2023	8/25/2023	WG	Reviewing & Analyzing Materials	Review and notations re: 7/14 WG2 meeting recording & transcript	1.92
SAMUEL	2023	8/25/2023	WG	Reviewing & Analyzing Materials	Review and notations re: 7/17 WG1 meeting recording & transcript	2.00
SAMUEL	2023	8/25/2023	WG	Preparing Comments	Drafting of UCAN informal comments re: WG1 Joint IOU Proposal, WG1 ED Proposal, WG1 MRC Proposal, WG2 Joint IOU + CCA Proposals, and WG2 Third Party Needs Proposal	5.42
SAMUEL	2023	8/30/2023	WG	Internal Correspondence & Analysis	Call w/ Jane re: WG1/2 comments, WG report timeline, and procedural schedule	0.58
SAMUEL	2023	9/11/2023	PILOT	Admin & Procedural Tasks	Email to Jane recommending UCAN support PG&E 2nd extension request	0.08
SAMUEL	2023	9/17/2023	PILOT	Internal Correspondence & Analysis	Response to Jane re: call scheduling	0.08
SAMUEL	2023	9/19/2023	PILOT	Internal Correspondence & Analysis	Call w/ Jane re: UCAN WG opening comment strategy re: pilot expansions	0.83
SAMUEL	2023	9/21/2023	PILOT	Admin & Procedural Tasks	Email to Jane forwarding / flagging PG&E pilot proposal 9/29 webinar invitation	0.08
SAMUEL	2023	9/25/2023	PILOT	Internal Correspondence & Analysis	Call w/ Jane re: opening comments re: pilot expansions	0.67
SAMUEL	2023	9/25/2023	PILOT	Reviewing & Analyzing Materials	Review of Working Group Report Addendums	1.08
SAMUEL	2023	9/25/2023	PILOT	Internal Correspondence & Analysis	Email to Jane attaching / flagging IOU responses to UCAN informal comments	0.17
SAMUEL	2023	9/25/2023	PILOT	Internal Correspondence & Analysis	Review of Jane's email w/ UCAN comment suggestions re: pilots	0.17
SAMUEL	2023	9/25/2023	PILOT	Preparing Comments	Drafting and submittal to Jane of opening comments on Pilot Expansions	5.92
SAMUEL	2023	9/27/2023	PILOT	Reviewing & Analyzing Materials	Review of PG&E and SCE expanded pilot proposals and opening comments on pilots	3.17
SAMUEL	2023	9/29/2023	PILOT	Participation in Meetings	Participation in PG&E webinar re: revised pilot proposals	1.08
SAMUEL	2023	9/29/2023	WG	Internal Correspondence & Analysis	Email to Jane forwarding 9/29 ruling extending WG report / comment deadlines and noting UCAN strategy implications	0.33
SAMUEL	2023	10/3/2023	PILOT	Reviewing & Analyzing Materials	Review of 10/3 ruling directing PG&E, SCE, CCAs to submit pilot budget details and allowing for additional final reply comments	0.08
SAMUEL	2023	10/3/2023	PILOT	Reviewing & Analyzing Materials	Review of opening comments on pilot expansions	1.25
SAMUEL	2023	10/3/2023	PILOT	Internal Correspondence & Analysis	Email to Jane flagging IOU LMS compliance plans in CEC docket 23-LMS-01	0.08
SAMUEL	2023	10/3/2023	PILOT	Reviewing & Analyzing Materials	Initial review of IOU LMS compliance plans	2.33
SAMUEL	2023	10/3/2023	PILOT	Internal Correspondence & Analysis	Email to Jane flagging PG&E's misrepresentation of UCAN comments re: hourly retail transmission pricing examples in LMS plans	0.08
SAMUEL	2023	10/6/2023	PILOT	Internal Correspondence & Analysis	Call w/ Jane re: reply comments re: pilot expansions	0.67
SAMUEL	2023	10/6/2023	PILOT	Reviewing & Analyzing Materials	Review of opening comments re: pilot expansions	0.42
SAMUEL	2023	10/9/2023	PILOT	Preparing Comments	Drafting and submittal of UCAN reply comments re: pilots	3.25
SAMUEL	2023	10/9/2023	PILOT	Reviewing & Analyzing Materials	Initial review of reply comments on pilots	1.83
SAMUEL	2023	10/10/2023	PILOT	Reviewing & Analyzing Materials	Continued review of reply comments on pilots	1.25
SAMUEL	2023	10/13/2023	DF RATES	Preparing Data Requests / Responses	Drafting and submittal of responses to SDG&E Data Request UCAN#1	2.25
SAMUEL	2023	10/16/2023	PILOT	Reviewing & Analyzing Materials	Review of PG&E, SCE and VCE pilot proposal budgets and supplemental responses to inform comments	0.83
SAMUEL	2023	10/16/2023	PILOT	Preparing Comments	Citations and notations re: SCE and PG&E reply comments to UCAN positions and CEJA, CforAT, Cal Advocates comments to inform comments	0.17
SAMUEL	2023	10/17/2023	WG	Internal Correspondence & Analysis	Call w/ Jane re: workshop debrief	0.25
SAMUEL	2023	10/17/2023	WG	Participation in Meetings	Remote participation in workshop on DFOIR Track B Working Group Proposals	5.75

SAMUEL	2023	10/17/2023	WG	Internal Correspondence & Analysis	Call w/ Gail Slocum (PG&E) re: workshop discussion concerning transmission issues	0.17
SAMUEL	2023	10/24/2023	PILOT	Preparing Comments	Initial drafting of UCAN final comments	2.17
SAMUEL	2023	10/24/2023	PILOT	Preparing Comments	Review of DFOIR workshop recording and citations to UCAN contributions for UCAN final comments on pilots	0.25
SAMUEL	2023	10/25/2023	PILOT	Internal Correspondence & Analysis	Call w/ Jane re: UCAN final comments on pilots	0.17
SAMUEL	2023	10/25/2023	WG	Admin & Procedural Tasks	Email to ED Staff & CalCCA noting omission of CalCCA workshop slides from service list distribution and requesting slides for distribution	0.08
SAMUEL	2023	10/25/2023	PILOT	Preparing Comments	Finalization of UCAN final comments re: pilot expansions and submittal to Jane for review	5.17
SAMUEL	2023	10/31/2023	WG	Admin & Procedural Tasks	Email to ED staff reminding them to disseminate CalCCA slides to service list	0.08
SAMUEL	2023	11/2/2023	WG	Internal Correspondence & Analysis	Call w/ Jane re: WG report comments	0.50
SAMUEL	2023	11/10/2023	DF RATES	Preparing Comments	Outline and initial drafting of UCAN Opening Comments on P1 Track B WG Report	8.00
SAMUEL	2023	11/13/2023	DF RATES	Preparing Comments	Finalization and submission to Jane of UCAN Opening Comments on P1 Track B Working Group Report	3.42
SAMUEL	2023	11/20/2023	DF RATES	Admin & Procedural Tasks	Email to SCE (Jameel Pueblos) requesting access be restored to Demand Flex WG sharepoint and to access 5/26/23 WG meeting recording; follow-up emails to Jameel and Jane	0.17
SAMUEL	2023	11/21/2023	DF RATES	Internal Correspondence & Analysis	Call w/ Jane re: WG report reply comments	0.75
SAMUEL	2023	12/20/2023	PILOT	Internal Correspondence & Analysis	Call w/ Jane re: PD on expanding pilots	0.33
SAMUEL	2023	12/20/2023	DF RATES	Internal Correspondence & Analysis	Call w/ Jane re: reply comments on WG proposals	1.00
SAMUEL	2023	12/20/2023	DF RATES	Reviewing & Analyzing Materials	Initial review of opening comments on WG Report proposals	1.42
SAMUEL	2023	12/21/2023	DF RATES	Preparing Comments	UCAN reply comment initial drafting	7.75
SAMUEL	2023	12/22/2023	DF RATES	Internal Correspondence & Analysis	Call w/ Jane re: UCAN reply comment drafting	0.17
SAMUEL	2023	12/22/2023	DF RATES	Internal Correspondence & Analysis	Finalization and submission to Jane of UCAN Reply Comments on P1 Track B Working Group Report	5.25
SAMUEL	2024	1/4/2024	PILOT	Reviewing & Analyzing Materials	Review of Pilot expansion PD	1.25
SAMUEL	2024	1/4/2024	PILOT	Internal Correspondence & Analysis	Call w/ Jane re: Pilot expansion PD & UCAN comment strategy	0.58
SAMUEL	2024	1/4/2024	DF RATES	Internal Correspondence & Analysis	Call w/ Jane re: consideration of ex parte & UCAN strategy	0.50
SAMUEL	2024	1/11/2024	PILOT	Reviewing & Analyzing Materials	Review of party comments on Pilot Expansion PD	1.33
SAMUEL	2024	1/11/2024	PILOT	Internal Correspondence & Analysis	Email to Jane w/ excerpts of party comments on Pilot Expansion PD and confirmation that UCAN need not reply.	0.08
SAMUEL	2024	2/28/2024	PILOT	Internal Correspondence & Analysis	Email to Jane re: final decision on pilot expansions, adoption of UCAN recommendations, implications for CEC docket 23-LMS-01, and impacts on UCAN strategy	0.17
SAMUEL	2024	4/30/2024	DF RATES	Reviewing & Analyzing Materials	Review of ALJ ruling on Track B WG 1 proposals and issue 5 and PG&E AL 7243-E (cited to in ALJ Ruling)	0.67
SAMUEL	2024	4/30/2024	DF RATES	Internal Correspondence & Analysis	Email to Jane re: ALJ Ruling on Track B / issue 5	0.08
SAMUEL	2024	5/10/2024	DF RATES	Reviewing & Analyzing Materials	Review of 5/9 protest of PAO to PG&E AL 7243-E	0.25
SAMUEL	2024	5/13/2024	DF RATES	Internal Correspondence & Analysis	Call w/ Jane re: ALJ ruling / questions for parties and UCAN strategy	0.83
SAMUEL	2024	5/23/2024	DF RATES	Reviewing & Analyzing Materials	Review of opening comments on ALJ Ruling Track B WG1 proposals & issue 5	1.92
SAMUEL	2024	6/7/2024	DF RATES	Internal Correspondence & Analysis	Email to Jane confirming need to file reply comments	0.08
SAMUEL	2024	6/11/2024	DF RATES	Preparing Comments	Drafting of UCAN reply comments on ALJ Ruling Track B WG1 proposals & issue 5	5.17
SAMUEL	2024	6/12/2024	DF RATES	Internal Correspondence & Analysis	Call w/ Jane re: UCAN reply comments	0.83
SAMUEL	2024	6/12/2024	DF RATES	Preparing Comments	Finalization and submission to Jane of reply comments on ALJ Ruling	1.75
SAMUEL	2024	8/23/2024	DF RATES	Reviewing & Analyzing Materials	Review of 8/22 ALJ Ruling re: Track B scope expansion	0.17
SAMUEL	2024	12/20/2024	DF RATES	Reviewing & Analyzing Materials	Review of U 338-E (SCE application for LMS rates) and forwarding to Jane	0.17
SAMUEL	2025	8/1/2025	DF RATES	Reviewing & Analyzing Materials	Review of PD on DF rate design	1.75
SAMUEL	2025	8/1/2025	DF RATES	Internal Correspondence & Analysis	Call w/ Jane re: UCAN strategy for PD opening comments	0.50
SAMUEL	2025	8/1/2025	DF RATES	Preparing Comments	Drafting and submittal to Jane re: proposed redlines to PD for UCAN comments	0.67
SAMUEL	2025	8/14/2025	DF RATES	Preparing Comments	Drafting and submittal to Jane of UCAN opening comments on PD	0.50
SAMUEL	2025	8/18/2025	DF RATES	Reviewing & Analyzing Materials	Review of opening comments on PD	1.50
SAMUEL	2025	8/19/2025	DF RATES	Internal Correspondence & Analysis	Call w/ Jane re: PD reply comment finalization	0.17
SAMUEL	2025	8/19/2025	DF RATES	Preparing Comments	Drafting and submission of PD reply comments to Jane	7.00
					Total Hours for Samuel Golding	145.17
Intervenor Compensation Hours						
SAMUEL	2025	10/20/2025	IC	Preparing ICOMP Requests	ICOMP preparation (ICOMP review / editing / drafting of section 2a)	6.42
SAMUEL	2025	10/21/2025	IC	Preparing ICOMP Requests	ICOMP preparation (review, verification, and categorization of hours)	1.50
					ICOMP Prep Totals for Samuel Golding	7.92

APPENDIX B
TIME-ENTRY ANALYSIS
Table B-1. Internal Correspondence & Analysis Entries

PERSON	YEAR	DATE	ISSUE	CATEGORY	TASK	HOURS
KRIKORIAN	2023	8/16/2023	WG	Internal Correspondence & Analysis	Phone call w/ Samuel Golding re: Comments due 8/25	0.67
GOLDING	2023	8/16/2023	WG	Internal Correspondence & Analysis	Call w/ Jane re: UCAN WG proposal informal comment strategy	0.67
KRIKORIAN	2023	8/17/2023	WG	Internal Correspondence & Analysis	Emailing Samuel Golding w/ WG 2 summaries for Comments due 8/25	0.50
GOLDING	2023	8/17/2023	WG	Internal Correspondence & Analysis	Review of Jane's email re: WG notes	0.25
KRIKORIAN	2023	8/20/2023	WG	Internal Correspondence & Analysis	Phone call w/ Samuel Golding re: WG 1 and WG 2 proposals and Comments due in Sharepoint 8/25 (so not on docket card)	0.58
GOLDING	2023	8/20/2023	WG	Internal Correspondence & Analysis	Call w/ Jane re: UCAN informal WG proposal comment strategy	0.58
KRIKORIAN	2023	8/30/2023	WG	Internal Correspondence & Analysis	Call w/ Samuel Golding re: Working Group process and comments	0.58
GOLDING	2023	8/30/2023	WG	Internal Correspondence & Analysis	Call w/ Jane re: WG1/2 comments, WG report timeline, and procedural schedule	0.58
GOLDING	2023	9/17/2023	PILOT	Internal Correspondence & Analysis	Response to Jane re: call scheduling	0.08
KRIKORIAN	2023	9/19/2023	PILOT	Internal Correspondence & Analysis	Phone call w/expert Samuel Golding re: comments on ALJ Ruling Aug. 15 2023 w/ Energy Division proposal to expand existing pilots - due Sept 25 2023	0.50
GOLDING	2023	9/19/2023	PILOT	Internal Correspondence & Analysis	Call w/ Jane re: UCAN WG opening comment strategy re: pilot expansions	0.83
KRIKORIAN	2023	9/22/2023	PILOT	Internal Correspondence & Analysis	Emailing Samuel Golding re: UCAN's concerns about expanding pilots and answering ALJ's questions	0.25
GOLDING	2023	9/25/2023	PILOT	Internal Correspondence & Analysis	Review of Jane's email w/ UCAN comment suggestions re: pilots	0.17
KRIKORIAN	2023	9/25/2023	PILOT	Internal Correspondence & Analysis	Phone call w/ Samuel Golding re: Comments and strategy for Reply Comments due Oct 9th	0.67
GOLDING	2023	9/25/2023	PILOT	Internal Correspondence & Analysis	Call w/ Jane re: opening comments re: pilot expansions	0.67
GOLDING	2023	9/25/2023	PILOT	Internal Correspondence & Analysis	Email to Jane attaching / flagging IOU responses to UCAN informal comments	0.17
GOLDING	2023	9/29/2023	WG	Internal Correspondence & Analysis	Email to Jane forwarding 9/29 ruling extending WG report / comment deadlines and noting UCAN strategy implications	0.33
GOLDING	2023	10/3/2023	PILOT	Internal Correspondence & Analysis	Email to Jane flagging IOU LMS compliance plans in CEC docket 23-LMS-01	0.08
GOLDING	2023	10/3/2023	PILOT	Internal Correspondence & Analysis	Email to Jane flagging PG&E's misrepresentation of UCAN comments re: hourly retail transmission pricing examples in LMS plans	0.08
KRIKORIAN	2023	10/6/2023	PILOT	Internal Correspondence & Analysis	Phone call w/ Samuel Golding re: Reply Comments on expanding existing pilots	0.67
GOLDING	2023	10/6/2023	PILOT	Internal Correspondence & Analysis	Call w/ Jane re: reply comments re: pilot expansions	0.67
KRIKORIAN	2023	10/17/2023	WG	Internal Correspondence & Analysis	Phone call w/ expert Samuel Golding re: workshop and UCAN's Comments on WG Proposal due Nov 13	0.25
GOLDING	2023	10/17/2023	WG	Internal Correspondence & Analysis	Call w/ Jane re: workshop debrief	0.25
GOLDING	2023	10/17/2023	WG	Internal Correspondence & Analysis	Call w/ Gail Slocum (PG&E) re: workshop discussion concerning transmission issues	0.17
KRIKORIAN	2023	10/25/2023	PILOT	Internal Correspondence & Analysis	Phone call w/ Samuel Golding re: final comments on expanding pilots including IOU's budget requests	0.17
GOLDING	2023	10/25/2023	PILOT	Internal Correspondence & Analysis	Call w/ Jane re: UCAN final comments on pilots	0.17
KRIKORIAN	2023	11/2/2023	WG	Internal Correspondence & Analysis	Phone call w/ Samuel Golding re: working group report Comments due Nov 13th	0.50
GOLDING	2023	11/2/2023	WG	Internal Correspondence & Analysis	Call w/ Jane re: WG report comments	0.50

KRIKORIAN	2023	11/21/2023	DF RATES	Internal Correspondence & Analysis	Phone call w/ Samuel Golding re: Reply Comments on WG proposals due Dec. 22 2023	0.75
GOLDING	2023	11/21/2023	DF RATES	Internal Correspondence & Analysis	Call w/ Jane re: WG report reply comments	0.75
KRIKORIAN	2023	12/20/2023	PILOT	Internal Correspondence & Analysis	Conference call w/ expert Samuel Golding re: PD on expanding pilots	0.33
GOLDING	2023	12/20/2023	PILOT	Internal Correspondence & Analysis	Call w/ Jane re: PD on expanding pilots	0.33
KRIKORIAN	2023	12/20/2023	DF RATES	Internal Correspondence & Analysis	Phone call w/ Samuel Golding re: reply comments on WG Proposals due Dec. 22 2023	1.00
GOLDING	2023	12/20/2023	DF RATES	Internal Correspondence & Analysis	Call w/ Jane re: reply comments on WG proposals	1.00
GOLDING	2023	12/22/2023	DF RATES	Internal Correspondence & Analysis	Call w/ Jane re: UCAN reply comment drafting	0.17
GOLDING	2023	12/22/2023	DF RATES	Internal Correspondence & Analysis	Finalization and submission to Jane of UCAN Reply Comments on P1 Track B Working Group Report	5.25
KRIKORIAN	2024	1/4/2024	PILOT	Internal Correspondence & Analysis	Phone call w/ Samuel Golding re: possible PD Comments and after discussion decided not to file PD Comments	0.58
GOLDING	2024	1/4/2024	PILOT	Internal Correspondence & Analysis	Call w/ Jane re: Pilot expansion PD & UCAN comment strategy	0.58
KRIKORIAN	2024	1/4/2024	DF RATES	Internal Correspondence & Analysis	Phone call w expert Samuel Golding discussing possible ex parte meeting w/ Commission staff and including Travis Kavulla who spoke about transmission issues at the May 26, 2023 WG meeting	0.50
GOLDING	2024	1/4/2024	DF RATES	Internal Correspondence & Analysis	Call w/ Jane re: consideration of ex parte & UCAN strategy	0.50
GOLDING	2024	1/11/2024	PILOT	Internal Correspondence & Analysis	Email to Jane w/ excerpts of party comments on Pilot Expansion PD and confirmation that UCAN need not reply.	0.08
GOLDING	2024	2/28/2024	PILOT	Internal Correspondence & Analysis	Email to Jane re: final decision on pilot expansions, adoption of UCAN recommendations, implications for CEC docket 23-LMS-01, and impacts on UCAN strategy	0.17
GOLDING	2024	4/30/2024	DF RATES	Internal Correspondence & Analysis	Email to Jane re: ALJ Ruling on Track B / issue 5	0.08
KRIKORIAN	2024	5/13/2024	DF RATES	Internal Correspondence & Analysis	Conference call w/ expert Samuel Golding re: ALJ Ruling from Apr 24th asking for Comments on WG 1 proposal and Issue 5	0.83
GOLDING	2024	5/13/2024	DF RATES	Internal Correspondence & Analysis	Call w/ Jane re: ALJ ruling / questions for parties and UCAN strategy	0.83
GOLDING	2024	6/7/2024	DF RATES	Internal Correspondence & Analysis	Email to Jane confirming need to file reply comments	0.08
KRIKORIAN	2024	6/12/2024	DF RATES	Internal Correspondence & Analysis	Emailing Samuel Golding re: SDG&E's marginal cost settlement agreement for comparison in reply comments	0.25
KRIKORIAN	2024	6/12/2024	DF RATES	Internal Correspondence & Analysis	Phone call w/ Samuel Golding re: Reply Comments due today on ALJ 4/24/24 Ruling on Track B WG 1 Proposals and Issue 5	0.83
GOLDING	2024	6/12/2024	DF RATES	Internal Correspondence & Analysis	Call w/ Jane re: UCAN reply comments	0.83
KRIKORIAN	2025	8/1/2025	DF RATES	Internal Correspondence & Analysis	Call w/ expert Samuel Golding re: Opening Comments on PD	0.50
GOLDING	2025	8/1/2025	DF RATES	Internal Correspondence & Analysis	Call w/ Jane re: UCAN strategy for PD opening comments	0.50
KRIKORIAN	2025	8/19/2025	DF RATES	Internal Correspondence & Analysis	Call w/ Samuel Golding re: Reply Comments on PD	0.17
GOLDING	2025	8/19/2025	DF RATES	Internal Correspondence & Analysis	Call w/ Jane re: PD reply comment finalization	0.17

Table B-2. Monthly Internal Coordination Hours vs. Total Hours

Month	Krikorian (IC&A)	Golding (IC&A)	IC&A Subtotal	All Other Hrs	Total Hrs
12/1/2022				1.50	1.50
1/1/2023				12.25	12.25
2/1/2023				9.00	9.00
3/1/2023				6.00	6.00
4/1/2023				8.00	8.00
5/1/2023				6.00	6.00
6/1/2023				12.00	12.00
7/1/2023				12.75	12.75
8/1/2023	2.09	2.33	4.42	46.92	51.33
9/1/2023	2.25	1.42	3.67	24.42	28.09
10/1/2023	1.42	1.09	2.51	44.92	47.42
11/1/2023	1.25	1.25	2.50	11.58	14.08
12/1/2023	6.75	1.33	8.08	11.17	19.24
1/1/2024	1.16	1.08	2.24	3.58	5.83
2/1/2024	0.17		0.17		0.17
3/1/2024					-
4/1/2024	0.08		0.08	0.67	0.75
5/1/2024	0.83	0.83	1.66	2.67	4.33
6/1/2024	0.92	1.08	2.00	7.67	9.66
7/1/2024					-
8/1/2024				0.17	0.17
9/1/2024					-
10/1/2024					-
11/1/2024					-
12/1/2024				0.17	0.17
1/1/2025					-
2/1/2025					-
3/1/2025					-
4/1/2025					-
5/1/2025					-
6/1/2025					-
7/1/2025					-
8/1/2025	0.67	0.67	1.34	12.09	13.43
9/1/2025				2.50	2.50
10/1/2025				17.42	17.42
Total	17.58	11.08	28.66	253.43	282.09

Table B-3. Preparing Comments — All Entries

PERSON	YEAR	DATE	ISSUE	CATEGORY	TASK	HOURS
GOLDING	2023	8/23/2023	WG	Preparing Comments	Compilation of notes / citations and identification of areas for UCAN comment / additional review or supporting research	2.5
GOLDING	2023	8/25/2023	WG	Preparing Comments	Drafting of UCAN informal comments re: WG1 Joint IOU Proposal, WG1 ED Proposal, WG1 MRC Proposal, WG2 Joint IOU + CCA Proposals, and WG2 Third Party Needs Proposal	5.42
KRIKORIAN	2023	9/25/2023	PILOT	Preparing Comments	Writing UCAN's Comments on ALJ's Ruling re: Staff Proposal to Extend Pilots	1.25
GOLDING	2023	9/25/2023	PILOT	Preparing Comments	Drafting and submittal to Jane of opening comments on Pilot Expansions	5.92
GOLDING	2023	10/9/2023	PILOT	Preparing Comments	Drafting and submittal of UCAN reply comments re: pilots	3.25
GOLDING	2023	10/16/2023	PILOT	Preparing Comments	Citations and notations re: SCE and PG&E reply comments to UCAN positions and CEJA, CforAT, Cal Advocates comments to inform comments	0.17
GOLDING	2023	10/24/2023	PILOT	Preparing Comments	Initial drafting of UCAN final comments	2.17
GOLDING	2023	10/24/2023	PILOT	Preparing Comments	Review of DFOIR workshop recording and citations to UCAN contributions for UCAN final comments on pilots	0.25
KRIKORIAN	2023	10/25/2023	PILOT	Preparing Comments	Making substantial edits to final draft of Comments on ALJ Ruling 8/15/23	0.5
GOLDING	2023	10/25/2023	PILOT	Preparing Comments	Finalization of UCAN final comments re: pilot expansions and submittal to Jane for review	5.17
GOLDING	2023	11/10/2023	DF RATES	Preparing Comments	Outline and initial drafting of UCAN Opening Comments on P1 Track B WG Report	8
GOLDING	2023	11/13/2023	DF RATES	Preparing Comments	Finalization and submission to Jane of UCAN Opening Comments on P1 Track B Working Group Report	3.42
GOLDING	2023	12/21/2023	DF RATES	Preparing Comments	UCAN reply comment initial drafting	7.75
GOLDING	2024	6/11/2024	DF RATES	Preparing Comments	Drafting of UCAN reply comments on ALJ Ruling Track B WG1 proposals & issue 5	5.17
GOLDING	2024	6/12/2024	DF RATES	Preparing Comments	Finalization and submission to Jane of reply comments on ALJ Ruling	1.75
GOLDING	2025	8/1/2025	DF RATES	Preparing Comments	Drafting and submittal to Jane re: proposed redlines to PD for UCAN comments	0.67
KRIKORIAN	2025	8/14/2025	DF RATES	Preparing Comments	Review and comments on draft Opening Comments on PD emailed to expert Samuel Golding	0.67
GOLDING	2025	8/14/2025	DF RATES	Preparing Comments	Drafting and submittal to Jane of UCAN opening comments on PD	0.5
GOLDING	2025	8/19/2025	DF RATES	Preparing Comments	Drafting and submission of PD reply comments to Jane	7

Table B-4. Meeting Attendance & Related Meeting-Recording Review Entries

PERSON	YEAR	DATE	ISSUE	CATEGORY	TASK	HOURS
KRIKORIAN	2022	12/9/2022	WG	Participation in Meetings	Attend Working Group (WG) kick-off meeting to establish guidelines and goals for WG 1 and WG 2	1.5
KRIKORIAN	2023	1/6/2023	WG	Participation in Meetings	Attending WG 1 Mtng 1 - Track B Issue 3: guidelines for all demand flexibility rate design applications	2
KRIKORIAN	2023	1/10/2023	WG	Participation in Meetings	Attending Residential Rate Summit on TOU transitioning grid of the future	3.5
KRIKORIAN	2023	1/13/2023	WG	Participation in Meetings	Attending WG 2 Mtng 1 - tour of Market Informed Demand Automation Server (MIDAS); "Prices to Devices"	2
KRIKORIAN	2023	1/20/2023	WG	Participation in Meetings	Attending WG 1 Mtng 2 - how wholesale rates could be incorporated into demand flexibility rates	2
KRIKORIAN	2023	1/27/2023	WG	Participation in Meetings	Attending WG 2 Mtng 2 - Price Machine Proposal; review ED CalFUSE systems; PGE presentation - implementing dynamic rates	2
KRIKORIAN	2023	2/3/2023	WG	Participation in Meetings	Attending WG 1 Mtng 3 - reviewing LBNL Inelastic Dynamic Price Study; how subscriptions alleviat price volatility	2
KRIKORIAN	2023	2/10/2023	WG	Participation in Meetings	Attending WG 2 Mtng 3 - reviewing more specifics on Price Machine for dynamic rates and upcoming proposals	2
KRIKORIAN	2023	2/17/2023	WG	Participation in Meetings	Attending WG 1 Mtng 4 - exploring what real time prices should recover	2
KRIKORIAN	2023	2/24/2023	WG	Participation in Meetings	Attending WG 2 Mtng 4 - reviewing core functions of Price Machine proposals	2
KRIKORIAN	2023	3/3/2023	WG	Participation in Meetings	Attending WG 1 Mtng 4- presentations on RTP from Oklahoma gas and electric and Georgia Power	2
KRIKORIAN	2023	3/10/2023	WG	Participation in Meetings	Attending WG 2 Mtng 5 - reviewing MIDAS, Energy Division and Joint IOU price machine proposals	2
KRIKORIAN	2023	3/17/2023	WG	Participation in Meetings	Attending WG 1 Mtng 5 reviewing marginal cost breakdowns Lawrence Butely Lab Presentation on dynamic pricing bill control tool, SCE on generation pricing	2
KRIKORIAN	2023	4/7/2023	WG	Participation in Meetings	Attending WG 2 Mtng 7 - transactive subscriptions and proceesses; reviewing 5 different systems and processes	2
KRIKORIAN	2023	4/14/2023	WG	Participation in Meetings	Attending WG 1 Mtng 7 - ED Staff Proposal for Guidance for IOU rate design applications for dynamic rates	2
KRIKORIAN	2023	4/21/2023	WG	Participation in Meetings	Attending WG 2 Mtng 8 - Scoping Memo Q4c - understand 3rd party barriers and possible solutions	2
KRIKORIAN	2023	4/28/2023	WG	Participation in Meetings	Attending WG 1 Mtng 8 - E3 presentation: white paper on Rate Design for Energy Division	2
KRIKORIAN	2023	5/5/2023	WG	Participation in Meetings	Attending WG 2 Mtng 9 - still reviewing 3rd party barriers and needs	2
KRIKORIAN	2023	5/12/2023	WG	Participation in Meetings	Attending WG 1 Mtg 9 - Distribution Capacity Pricing; reviewing breakdown of residential rate components	2
KRIKORIAN	2023	5/19/2023	WG	Participation in Meetings	Attending WG 2 Mtng 10 - Review five 3rd party proposals for WG Report	2
KRIKORIAN	2023	6/2/2023	WG	Participation in Meetings	Attending WG 2 Mtng 11-Operational Capabilities of 3rd party and barriers	2
KRIKORIAN	2023	6/9/2023	WG	Participation in Meetings	Attending WG 1 Mtng 11 - Berkeley Energy Institute vs. Kevala numbers; capacity needs on grid; TOU transmission study	2
KRIKORIAN	2023	6/16/2023	WG	Participation in Meetings	Attending WG 2 Mtng 12 Review Price Machine Proposals	2
KRIKORIAN	2023	6/23/2023	WG	Participation in Meetings	Attending WG 1 Mtng 12 LBNL Dynamic Pricing Tool presentation from Denmark Energy Infrastructure presentation	2
KRIKORIAN	2023	6/23/2023	WG	Participation in Meetings	Attending PG&E Dynamic Rate Research presentation	2
KRIKORIAN	2023	6/30/2023	WG	Participation in Meetings	Attending WG 2 Mtng 13 - CCA barriers to dynamic pricing	2
KRIKORIAN	2023	7/7/2023	WG	Participation in Meetings	Attending WG 1 Mtng 13 CCA Presentation in Demand Flexibility Rates, Microgrid Resources, Coalition proposals for Demand Flexibility Rate Design	2
KRIKORIAN	2023	7/14/2023	WG	Participation in Meetings	Attending WG 2 Mtng 14 - reviewing party proposals and barriers for 3Ps in offering DF services; timeline for WG Report	2
KRIKORIAN	2023	7/14/2023	WG	Participation in Meetings	Attending WG 1 Supplemental meeting- issues 3 of Track B guidance for DF	2
KRIKORIAN	2023	7/21/2023	WG	Participation in Meetings	Attending WG 1 Mtng 14 - Reviewing RTP proposal from Joint Utilities, Energy Division, Microgrid Resource Coalition	1.75
KRIKORIAN	2023	7/28/2023	WG	Participation in Meetings	Attending WG 2 mtng 15 - list of proposals and updates, deadlines, etc.	2
KRIKORIAN	2023	8/4/2023	WG	Participation in Meetings	Attending WG 1 Mtn g 15 - Reviewing ED Staff proposal and guidance for utility DF rate application	1.75
GOLDING	2023	8/24/2023	PILOT	Participation in Meetings	Remote participation in Pilot Expansion Proposal workshop	1.92
GOLDING	2023	8/24/2023	WG	Reviewing & Analyzing Materials	Review of 7/21 WG1 meeting recording & transcript	1.92
GOLDING	2023	8/24/2023	WG	Reviewing & Analyzing Materials	Review and notations re: 7/28 WG2 meeting recording & transcript	1.92
GOLDING	2023	8/25/2023	WG	Reviewing & Analyzing Materials	Review and notations re: 7/14 WG2 meeting recording & transcript	1.92
GOLDING	2023	8/25/2023	WG	Reviewing & Analyzing Materials	Review and notations re: 7/17 WG1 meeting recording & transcript	2
KRIKORIAN	2023	9/29/2023	PILOT	Participation in Meetings	Attending Teams meeting for PG&E presentation on Proposals Expanding Existing Pilots filed w. Comments on 9/25/23 to ALJ's 8/15 Ruling w/ ED's expanding the pilots proposal attached	1
GOLDING	2023	9/29/2023	PILOT	Participation in Meetings	Participation in PG&E webinar re: revised pilot proposals	1.08
KRIKORIAN	2023	10/17/2023	WG	Participation in Meetings	Attending Microsoft teams mtng workshop for WG Proposals	6
GOLDING	2023	10/17/2023	WG	Participation in Meetings	Remote participation in workshop on DFOIR Track B Working Group Proposals	5.75