



STATE OF CALIFORNIA

GAVIN NEWSOM, Governor

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

FILED

06/09/26

01:37 PM

A2404005

June 9, 2026

Agenda ID #24281
Ratesetting

TO PARTIES OF RECORD IN APPLICATION 24-04-005:

This is the proposed decision of Administrative Law Judge Regina DeAngelis. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's July 16, 2026 Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties to the proceeding may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure. Electronic copies of comments should also be sent to the Intervenor Compensation Program at icompcoordinator@cpuc.ca.gov.

/s/ MICHELLE COOKE
Michelle Cooke
Chief Administrative Law Judge

MLC:nd3
Attachment

Decision **PROPOSED DECISION OF ALJ DeANGELIS** (Mailed 6/9/2026)**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Application of Southern California Edison Company (U 338-E) for Authorization to Recover Incremental Costs Related to Wildfire Mitigation, Vegetation Management, Catastrophic Events, and Wildfire Liability Insurance.

Application 24-04-005

**DECISION GRANTING, IN PART, COMPENSATION TO
SMALL BUSINESS UTILITY ADVOCATES
FOR LIMITED SUBSTANTIAL CONTRIBUTIONS TO DECISION 25-06-017**

Intervenor: Small Business Utility Advocates	For contribution to Decision (D.) 25-06-017
Claimed: \$53,260.00	Awarded: \$23,066.00
Assigned Commissioner: Karen Douglas	Assigned ALJ: Regina DeAngelis

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.25-06-017 (Decision) approved a Settlement Agreement between the Applicant Southern California Edison Company (SCE) and parties, including Public Advocates Office at the California Public Utilities Commission (Cal Advocates) and Small Business Utility Advocates (SBUA), resolving SCE's request for recovery of incremental costs related to wildfire mitigation, vegetation management, catastrophic events and wildfire liability insurance costs, principally incurred in 2023.
--	--

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:¹

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	May 22, 2024	Verified
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	June 21, 2024	Verified
4. Was the NOI timely filed?		Yes
Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	A.23-10-001	Verified
6. Date of ALJ ruling:	June 3, 2024	Verified
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes, see Part I.C.1, below, for discussion on this topic.
Showing of “significant financial hardship” (§ 1802(h) or § 1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	A.23-10-001	Verified
10. Date of ALJ ruling:	June 3, 2024	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes, see Part I.C.2., for discussion on this topic.
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.25-06-017	Verified
14. Date of issuance of Final Order or Decision:	June 19, 2025	Verified
15. File date of compensation request:	August 15, 2025	Verified
16. Was the request for compensation timely?		Yes

¹ All statutory references are to the Public Utilities Code (Pub. Util. Code), unless indicated otherwise.

C. Additional Comments on Part I:

#	CPUC Discussion (Part I.C.)
8	<p>Customer status has been established based on SBUA’s request in this proceeding for the Commission to rely on the Commission’s prior finding dated June 3, 2024 in A.23-10-001 to establish customer status under Category 3.</p> <p>NOIs include the following question on customer status applicable to SBUA:</p> <p><i>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</i></p> <p>SBUA’s June 21, 2024 NOI (Section 4, p. 3) filed in this proceeding responds to the above question, in relevant part, as follows: “<i>SBUA has a few members that are themselves nonprofit organizations that represent small businesses but estimates that 97% or more of its California members are small commercial customers</i>” and SBUA suggests that this 97% are receiving bundled service, per the statute. No further information on its membership is provided in SBUA’s supplemental filing dated December 17, 2025 filed in this proceeding.</p> <p>In a recent intervenor compensation filing by SBUA in a different proceeding (A.20-01-007 February 21, 2025 <i>Second Supplement to Intervenor Compensation Claim</i>), SBUA states, as follows:</p> <p><i>Additionally, Mr. Birkelund was previously an employee of SBUA, but in 2023 and 2024, he provided services as outside counsel at the law firm of E&E Law Corp. on a contingency and deferral basis. See D.25-02-025 (approving this outside counsel relationship at market rates). SBUA agreed to pay for Mr. Birkelund’s time at the market rates of \$770 per hour in 2023 and \$800 per hour in 2024, as detailed in the billing records in Attachment 3. As necessitated by the nonprofit, he continued with the same responsibilities and to provide the same General Counsel services to SBUA.</i></p> <p>The above statement, the Commission has “<i>approv[ed] this outside counsel relationship</i>” suggests SBUA has received Commission approval for what it describes as “its outside counsel relationship.” The Commission’s finding of customer status does not “approve” any aspects of SBUA’s outside counsel relationships or other business models relied upon and should not be cited as such.</p> <p>In reviewing documents related to customer status, SBUA’s outside attorneys and consultants sometimes identify themselves as part of SBUA and at other times as working for outside companies. In the future when signing pleading, filing documents, or otherwise representing themselves before the Commission, SBUA’s outside attorneys</p>

#	CPUC Discussion (Part I.C.)
	<p>and consultants, including those with E&E Law, shall identify themselves as associated with the consulting company or otherwise and are representing SBUA in the proceeding in the capacity as an outside consultant/attorney. This practice is consistent with other participants in Commission proceedings.</p>
12	<p>The Commission relies upon a prior showing of “significant financial hardship” dated June 3, 2024.</p> <p>In the above quoted statement from SBUA’s request in A.20-01-007 dated February 21, 2025, which providing, in part, the Commission has “<i>approv[ed] this outside counsel relationship...</i>,” SBUA suggests it received Commission approval for what it describes as “its outside counsel relationship.”</p> <p>SBUA makes the same claim in its December 17, 2025 Supplemental filing at 2 in this proceeding, stating “<i>With regard to using outside consultants, the Commission has explicitly approved of contingency agreements, acknowledging that such arrangements may be necessary due to financial hardships faced by intervenors. Decision (“D.”) 24-10-029 at 24.</i>”</p> <p>Past findings by the Commission of “significant financial hardship” do not “approve” any aspects of SBUA’s outside counsel relationships or other business models and should not be cited as such.</p>

PART II: SUBSTANTIAL CONTRIBUTION

A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059):

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>1. SBUA Obtained Enhanced SCE Reporting on Small Commercial Customer Affordability Impacts</p> <p>SBUA presented testimony on the affordability impacts on small commercial customers and the lack of sufficient metrics evaluating this in SCE’s applications.</p>	<p>The Decision (pp. 20-21) approved the Settlement Agreement, which provides:</p> <p>In future after-the-fact reasonableness review applications seeking review of SCE’s WMPMA, FRMMA, or VMBA costs in 2024 and through the 2025-2028 GRC Period, including any future</p>	<p>As addressed in Part III.D, herein, SBUA’s “substantial contribution” was limited. SBUA’s substantive documents and analysis amounted to eight pages of direct testimony and two</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>SBUA-01, p. 2-3; see also, <i>Joint Motion by Southern California Edison Company (U 338-E), The Public Advocates Office, and Small Business Utility Advocates for Approval of Settlement Agreement</i> (March 21, 2025), p. A-5.</p>	<p>tracks or phases that may be established in connection with SCE’s 2025 GRC, SCE will identify (i) the forecasted average percentage and dollar bill impact for three National American Industry Classification System (NAICS) codes including Food Services and Drinking Places (NAICS 722), Ambulatory Health Care Services (NAICS 621), and Real Estate (Property Management, NAICS 531), as well as for “small retail store” building types; and (ii) total anticipated bill changes to small business customers. SCE will provide this information at the time the application is filed and in the event it seeks interim rate recovery, also during the pendency of the proceeding.</p> <p>This provision will ensure that SCE generates a clear record in each application of the affordability impacts on small commercial customers. This will enable improved review and evaluation of the reasonableness of the costs under Public Utilities Code section 451 and supports ESJ Action Plan 2.0 Goal 1.1.1 to “[c]onsider a designated section on ESJ impacts in decisions, resolutions, and advice letters that impact customers, residents, or small businesses in ESJ communities.”</p>	<p>pages of rebuttal testimony.</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>2. SBUA Reduced FRMMA and VMBA Ratepayer Costs and Enhanced Future Reasonableness Review of SCE Vegetation Management Cost Exceedances</p> <p>SBUA’s testimony and discovery argued that SCE had not demonstrated the reasonableness of its vegetation management costs contained in its Vegetation Management Balancing Account (VMBA) and associated environmental support costs contained in its Fire Risk Mitigation Memorandum Account (FRMMA) due to failing to explain and justify exceedances far beyond those approved in the GRC and presenting far less detail in its after-the-fact review than it did in its initial request in the GRC. SBUA-01, pp. 4-6; SBUA-02, pp. 1-2; SBUA-07; SBUA-08.</p> <p>Cal Advocates did not object to the manner that SCE presented or justified its cost exceedances in 2023 but rather sought disallowance of all costs requested for work performed in 2022 as out of</p>	<p>The Decision recognized that SBUA’s engagement and participation supported the foundation for approving the Settlement Agreement in the public interest: Decision at 24 (“SCE and Cal Advocates and SBUA, have extensive experience and expertise with Commission ratemaking applications”); see also, FOF No. 12, 14, 15 (parties represent interests of ratepayers).</p> <p>The Decision approved the Settlement Agreement, reducing the FRMMA and VMBA cost impact on customers by \$10.5 million, and also improved reasonableness review of future vegetation management costs:</p> <p>In future after-the-fact reasonableness review applications seeking recovery of incremental Vegetation Management Balancing Account (VMBA) costs in 2024 and through the 2025-2028 GRC Period, including any future tracks or phases that may be established in SCE’s 2025 GRC, SCE will include variance explanations identifying and explaining overspends or underspends of SCE’s recorded costs and, where feasible, variances in the quantity of activity, as compared to, the applicable categories of costs and quantities described in SCE’s testimony and workpapers submitted in the applicable</p>	<p>As addressed in Part III.D, herein, SBUA’s substantive analysis of its issues in this proceeding was limited.</p> <p>While SBUA cites here to the portion of the Decision that states SBUA has extensive experience and expertise, this statement refers to SBUA’s history of participation before the Commission and does not opine on the quality of SBUA’s contribution in this proceeding.</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>scope of the Application. CA-02, pp. 5-8.</p> <p>The Settlement Agreement reduced SCE's recovery by \$1 million for FRMMA and \$9.5 million for VMBA. See Joint Motion for Settlement, p. 19.</p> <p>The Settlement Agreement also, to a large extent, prospectively addressed SBUA's criticism of SCE's manner of presenting vegetation cost exceedances. See Joint Motion for Settlement, p. 11.</p>	<p>GRC filing for which funding for the activity or program was approved, to the extent that information is reasonably available and ascertainable to SCE.</p> <p>Decision, p. 20.</p> <p>This provision will protect ratepayers and facilitate Commission reasonableness review pursuant to Public Utilities Code Section 451.</p>	
<p>3. SBUA Reduced CEMA Ratepayer Costs</p> <p>SBUA argued that SCE's request for recovery of \$3.438 million in COVID-19-related personal protective equipment and sanitation supplies disposed of as salvage in 2023 in its Catastrophic Event Memorandum Account (CEMA) was unsupported and potentially wasteful. SBUA-01, p. 8; SBUA-02, p. 2. SBUA engaged in discovery, generating a record that was lacking in the Application and justifying part of SCE's disposal decision but questioning the necessity of disposing of equipment that</p>	<p>The Decision approved the Settlement Agreement, reducing the CEMA cost impact on customers by \$1.4 million. Decision, pp. 21-25 (approving Settlement Agreement); Settlement Agreement, A-7 (CEMA reduction).</p>	<p>As addressed in Part III.D, herein, SBUA's substantive analysis of the issues was limited, amounting to eight pages of direct testimony and two pages of rebuttal testimony.</p> <p>Based on this limited substantive participation, SBUA cannot be credited with the reduction to ratepayers of \$1.4 million, as implied by SBUA.</p>

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>was not expired and for which SCE did not compare their value with, or present information on, storage costs and alternatives in 2023. SBUA-05, pp. 1-2.</p> <p>In contrast with SBUA's position, Cal Advocates recommended a total reduction of \$784,000 from SCE's CEMA request for other reasons. CA-01, p. 2. The Settlement Agreement reduced SCE's CEMA recovery by \$1.4 million. Settlement Agreement, p. 19.</p>		
<p>4. SBUA Obtained Enhanced Future Review of SCE Ratepayer Funding of Aerial Firefight Assets Used by Public Safety Agencies for the General Public</p> <p>In 2023, SCE switched from funding stand-by costs for aerial firefighting assets operated by firefighting agencies during the six months with the greatest wildfire danger to year-around funding. SBUA objected that SCE had not established that non-ratepayers sources of funding were unavailable for these general public safety services or that ratepayer funding was need</p>	<p>The Decision approved SCE providing enhanced documentation of the need for ratepayer funding for aerial firefighting assets used by public safety agencies in future reasonableness review applications:</p> <p>In future after-the-fact reasonableness review applications seeking recovery of SCE's costs for the Quick Reaction Force (QRF):</p> <p>i. SCE will document the (1) firefighting agencies' efforts that it is aware of to find alternative sources of QRF funding and a (2) description of the firefighting agencies' efforts to secure other non-financial resources (e.g., through mutual aid agreements) for the period covered by the</p>	<p>As addressed in Part III.D, herein, SBUA's substantive analysis of these issues was limited.</p> <p>In addition, the adopted settlement provision referred to by SBUA did not reduce ratepayer costs in this proceeding but adopted future reporting requirements. The impact of these reporting requirements in terms of ratepayer savings is not clear.</p> <p>SBUA claims here that <i>"This reporting will protect ratepayers and enhance Commission reasonableness review</i></p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>to assure availability of helicopters year-around. SBUA-01, pp. 6-8; see also Joint Motion for Settlement, p. 11. SBUA engaged in discovery showing that SCE had not evaluated the availability of public sources of funding. See, e.g., SBUA-03; SBUA-06.</p> <p>Cal Advocates did not object to these costs or SCE’s documentation. SBUA-02, p. 2, ln. 1-6.</p> <p>The Settlement Agreement requires SCE to prospectively improve documentation that ratepayer funding is necessary.</p>	<p>application or for ongoing efforts for future years.</p> <p>ii. To demonstrate efforts to reduce firefighting agencies’ reliance on SCE customer funding, SCE will report on the firefighting agencies’ ongoing and planned efforts that it is aware of to obtain alternative funding or efforts to secure other non financial resources (e.g., through mutual aid agreements) for future years for which SCE has not entered into funding agreements with the firefighting agencies, such as by means of filing actual budget requests, grant applications, proposed legislation, etc., as appropriate to agencies actual budgeting/funding processes.</p> <p>iii. SCE will also report on the firefighting agencies’ budget for non SCE funded aerial suppression assets, to the extent that information is reasonably available to SCE and ascertainable, from the subject application year onward.</p> <p>Decision, pp. 19-20.</p> <p>This reporting will protect ratepayers and enhance Commission reasonableness review under Public Utilities Code section 451.</p>	<p><i>under Public Utilities Code section 451.</i>” It is more accurate to state that it “may” protect ratepayers.</p> <p>SBUA’s citation here to the <i>Joint Motion for Settlement</i> should be at 14-15 (not at 11).</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>5. Resolution of Department Overhead and Common Cost Charges</p> <p>After the case was submitted, SCE informed SBUA that it had discovered that between 2019 and 2023, SCE had inadvertently counted department overhead and common costs in its wildfire costs with the result that wildfire recovery amounts were overstated by approximately \$22.8 million. SBUA conferred with SCE and Cal Advocates to understand this issue and confirm that it did not impact the Settlement Agreement, and could be addressed in a more detail in a future proceeding without further discovery or briefing in this application. Consideration of this unexpected issue was necessary and SBUA addressed it efficiently. SBUA submits that time spent on this issue is within the scope of award allowed by Public Utilities Code section 1802(j) for “all reasonable advocate’s fees, reasonable expert fees, and other reasonable costs incurred by the customer in preparing or presenting that</p>	<p>The Decision (p. 26) describes the issue in detail, noting no parties opposed the motion, which was on account of SBUA determining that the adjustment was appropriate, and approves SCE reducing recovery by approximately \$5 million.</p>	<p>As addressed in Part III.D, herein, in evaluating the impact of SBUA’s contribution on this issue, which was an issue raised late in the proceeding, Cal Advocates was well-positioned to evaluate this issue since Cal Advocates presented a comprehensive analysis of the case. In contrast to SBUA’s substantive analysis, which was limited, amounting to eight pages of direct testimony and two pages of rebuttal testimony.</p> <p>In this situation, it would have been reasonable for SBUA to defer to Cal Advocates and, thereby, avoid unnecessary duplication to conserve ratepayer funding, rather than spend time at this late stage of the proceeding to address a new matter already covered by Cal Advocates.</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
contention or recommendation.”		

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

	Intervenor’s Assertion	CPUC Discussion
a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?	Yes.	Verified
b. Were there other parties to the proceeding with positions similar to yours?	No.	Noted
c. If so, provide name of other parties:		
<p>d. Intervenor’s claim of non-duplication:</p> <p>The Utility Reform Network was a formal party to the proceeding but did not file testimony or join the settlement. SBUA took complimentary positions with Cal Advocates on some issues but principally identified different deficiencies in SCE’s application and took unique positions on the non-financial issues that were addressed in the settlement.</p>		<p>The Commission finds unreasonable duplication.</p> <p>SBUA states here, in part, that it “<i>principally identified different deficiencies ...and took unique positions....</i>” in comparison to Cal Advocates. While SBUA focused on different (but also similar) issues versus Cal Advocates, SBUA’s substantive analysis of issues was limited.</p> <p>See Part III.D, for the Commission discussion and rationale for SBUA’s limited substantial contribution (including duplication).</p>

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
<p>a. Intervenor’s claim of cost reasonableness:</p> <p>SBUA seeks compensation for contributing to the final decision, which reduced the total imposed on customers by \$12 million, including by \$11.9 million identified in the Settlement Agreement with the issues that SBUA submitted testimony and evidence.</p> <p>SBUA’s involvement significantly improved the record and outcome of the proceeding by, among other contributions identified in the Decision and Settlement Agreement, establishing new SCE reporting requirements to document need for ratepayer funding of aerial firefighting assets used for general public safety; requiring SCE to provide enhanced explanation of overspend in VMBA/FRMMA cost recovery applications filed during the next GRC period; and requiring SCE to report on the affordability and bill impact on small businesses from any wildfire-related cost recovery applications filed in the next GRC period.</p> <p>SBUA’s participation was focused and the compensation request seeks an award of <u>\$53,260.00</u> for <u>74.05</u> hours of work, excluding compensation related time. This amount is reasonable in light of the cost savings and important improvements to SCE’s applications going forward. SBUA’s contribution was substantial and clearly justified SBUA’s hours on behalf of an underrepresented class of ratepayers. For these reasons, the Commission should find that SBUA’s efforts have been valuable and approve the request for fees.</p>	<p>The Commission does not agree with SBUA’s statement here that it “<i>significantly improved the record...of the proceeding.</i>”</p> <p>SBUA submitted the following written documents in the proceeding: (1) a motion for party status (non-substantive), (2) eight pages of opening testimony, and (3) two pages of rebuttal testimony.</p> <p>The written testimony is limited and the content vague.</p> <p>As such, SBUA’s claim is inaccurate that it “significantly” improved the record. Rather, SBUA provided limited substantive contributions to the record of this proceeding.</p> <p>See Part III.D, herein, for discussion and rationale for SBUA’s limited substantial contribution.</p>
<p>b. Reasonableness of hours claimed:</p> <p>SBUA relied on two experienced attorneys for its advocacy related to this compensation request. SBUA assigned primary responsibility to mid/senior-level attorney, Ariel Strauss. Mr. Strauss has represented SBUA in several wildfire cost reasonableness review proceedings, including SCE’s equivalent application for the previous two years (2021 and 2022) and Pacific Gas & Electric’s wildfire-related cost</p>	<p>The Commission finds some of the hours claimed by SBUA unreasonable. SBUA submitted limited substantive materials and the input in their written materials was limited and the content vague.</p>

	CPUC Discussion
<p>recovery application (A.24-11-009), PacifiCorp’s CEMA application (A.24-09-004), San Diego Gas & Electric’s GRC Track II (A.22-05-016), and SCE’s 2025 GRC. Mr. Strauss brings extensive experience with the facts and issues in this application that allowed for efficient identification and resolution of issues here. SBUA minimized party and Commission time by entering discovery in-lieu of cross, avoiding the need for evidentiary hearings, and effectively settled the case without briefing. <i>See, e.g.</i>, Decision, FOF #29 (“In evaluating this Settlement Agreement, the Commission accepts that Cal Advocates and SBUA have the expertise and reasoned judgement to decide to settle a matter rather than litigate.”)</p> <p>SBUA’s General Counsel, James Birkelund, provided high-level strategic direction and critical feedback, leveraging his expertise to refine SBUA’s litigation positions while managing work efforts. His oversight ensured that SBUA’s involvement was focused, impactful, and aligned with the organization’s mission to advocate for small business interests. Both Mr. Birkelund and Mr. Strauss are employed by E&E Law Corp. (E&E Law), which represents SBUA in this matter on a contingency basis at prevailing market rates. <i>See Attachment 3</i> (attorney-client agreement, filed under seal). The Commission has previously approved this outside counsel arrangement. <i>See, e.g.</i>, D.25-05-023; D.25-05-021; D.25-03-029; D.25-04-012; and D.25-02-025.</p> <p>The coordinated approach between professionals enabled SBUA to submit high quality work product while maintaining a cost-effective and efficient legal strategy.</p>	<p>As such, SBUA’s decision to engage two outside attorney/consultants (E&E Law) with billing rates between approximately \$500 - \$800 per hour was unreasonable as the skill level commensurate with those rates is not reflected in the substantive input.</p> <p>See Part III.D, herein, for the Commission discussion and rationale for SBUA’s limited substantial contribution (including SBUA engagement of unnecessary outside attorney/consultant).</p>
<p>c. Allocation of hours by issue:</p> <p>SBUA has assigned the following issue codes:</p> <ol style="list-style-type: none"> 1. Small Commercial Customer Affordability (12.5 hours; 17.2%) 2. Reasonableness of SCE Vegetation Management Cost Exceedances (15.65 hours; 21.5%) 	<p>The descriptions here provided by SBUA imply that SBUA prepared the supporting timesheets, rather than E&E Law.</p> <p>SBUA states, “<i>SBUA asserts that the categories above are well defined to allow SBUA to accurately assign hours to</i></p>

	CPUC Discussion
<p>3. Reasonableness of COVID-19 CEMA Costs (7.55 hours; 10.4%)</p> <p>4. Reasonableness of Aerial Firefighting Costs (19.8 hours; 27.2%)</p> <p>5. Department Overhead Reduction (2.6 hours; 3.6%)</p> <p>6. Hearings, Meet and Confers, Conferences (8.25 hours; 11.3%)</p> <p>7. General Participation (6.4 hours; 8.8%)</p> <p>Categories #1-5 all fall within Issue 1 of the July 11, 2024, Assigned Commissioner’s Scoping Memo and Ruling: “Whether the Commission should find SCE’s requested cost recovery of approximately \$945 million (expense and capital) plus interest, mostly incurred in 2023 and recorded in SCE’s WMPMA, FRMMA, VMBA, or WRMBA incremental, just and reasonable, and properly recoverable as expense and capital in revenue requirement through distribution rates over a 12- month period (expense) and until included in the base rates (capital)”.</p> <p>SBUA asserts that the categories above are well defined to allow SBUA to accurately assign hours to various tasks in its time entries. Should the Commission wish to see different information on this point or some other breakdown of SBUA’s hourly work, SBUA requests that we be so informed and provided an opportunity to supplement this request accordingly. SBUA submits that all of the hours claimed were reasonably efficiently expended and should be fully compensated.</p>	<p><i>various tasks in its time entries.”</i></p> <p>SBUA also suggests that it passes through the timesheets of E&E Law.</p> <p>In the future, SBUA must clarify who prepares the timesheets and the level of involvement of SBUA. For example, SBUA must advise the Commission whether E&E Law “assigned hours to various tasks” or whether SBUA performed this timesheet input.</p>

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Ariel Strauss Consultant E&E Law	2024	7	\$530.00	D.25-03-021	\$3,710.00	7.00 [1] ²	\$530.00 [2]	\$3,710.00
Ariel Strauss Consultant E&E Law	2025	33	\$550.00	As above, escalated by 3.46% for 2025.	\$18,150.00	33.00 [1]	\$550.00 [2]	\$18,150.00
James Birkelund Consultant E&E Law	2024	8	\$800.00	D.25-03-021	\$6,400.00	0.00 [1]	N/A [1]	\$0.00
James Birkelund Consultant E&E Law	2025	24.75	\$830.00	D.25-07-036	\$20,542.50	0.00 [1]	N/A [1]	\$0.00
Subtotal: \$48,802.50						Subtotal: \$21,860.00		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
James Birkelund Consultant E&E Law	2024	0.25	\$400.00	50% of 2024 rate	\$100.00	0.00 [3]	N/A [3]	\$0.00
Ariel Strauss Consultant E&E Law	2024	0.4	\$275.00	50% of 2025 rate	\$110.00	0.40 [3]	\$265.00 [2]	\$106.00
James Birkelund Consultant E&E Law	2025	5	\$415.00	50% of 2025 rate	\$2,075.00	0.00 [3]	N/A [3]	\$0.00
Ariel Strauss Consultant E&E Law	2025	7.9	\$275.00	50% of 2025 rate	\$2,172.50	4.00 [3]	\$275.00 [2]	\$1,100.00
Subtotal: \$4,457.50						Subtotal: \$1,206.00		
TOTAL REQUEST: \$53,260.00						TOTAL AWARD: \$23,066.00		

² The bracketed numbers refer to the Commission's discussion in Part III.D, below.

CLAIMED		CPUC AWARD	
<p>*The Commission and staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§ 1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate.</p>			
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ³	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
James M. Birkelund	March 2000	206328	No
Ariel S. Strauss	March 2012	282230	No

C. Attachments Documenting Specific Claim and Comments on Part III:⁴

Attachment or Comment #	Description/Comment
Attachment 1	SBUA Certificate of Service (<i>see</i> attachment under separate cover)
Attachment 2	Time Sheet Records with Allocation of Hours by Issue (Note: No invoices are provided by SBUA. Internal timesheets by E&E Law are submitted.)
Attachment 3	SBUA Attorney-Client Agreement with E&E Law (redacted to remove attorney-client information; confidential version separately filed by motion under seal)

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Reduction of requested hours due to inadequate showing of "substantial contribution," including excessive, inefficient, duplicative, and unreasonable	Pub. Util. Code § 1802(j) states that a substantial contribution means that the intervenor "has substantially assisted the commission in the making of its order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer." The courts have addressed the requirement of substantial contribution in, for example, <i>TURN v. CPUC</i> 166 Cal.App. 4 th 522 (2008), stating at 11:

³ This information may be obtained through the State Bar of California's website at <https://apps.calbar.ca.gov/attorney/LicenseeSearch/QuickSearch>.

⁴ These noted attachments from the intervenor are not included in this decision.

Item	Reason
<p>requested compensation</p>	<p>“[T]o be eligible for compensation, the statute requires that the customer have made a ‘substantial contribution’ to the PUC’s proceedings, as the PUC determines. “‘Substantial contribution’ means that, in the judgment of the commission, the customer’s presentation has substantially assisted the commission in the making of its order or decision....”</p> <p>In evaluating whether SBUA made a substantial contribution here, the Commission evaluates whether the hours claimed were commensurate with the contributions claimed by the intervenor. Making a substantial contribution in and of itself does not entitle an intervenor to all its claimed fees and costs. Compensation is granted for efficient, meaningful contributions.</p> <p>SBUA submitted the following written documents in the proceeding: (1) a motion for party status, (2) eight pages of opening testimony, and (3) two pages of rebuttal testimony. The written testimony was of minimal impact as the reasoning was vague and not well-developed. SBUA also participated in settlement discussions/review of documents.</p> <p>SBUA claims approximately 68 hours for the above noted work. These hours reflect work by two attorneys from SBUA’s consultant, E&E Law, as follows: (1) approximately 32.75 hours for Birkelund’s work at approximately \$830 per hour and (2) approximately 36 hours by Strauss at approximately \$550 per hour. According to SBUA’s December 17, 2025 Supplement, work was also performed by unnamed SBUA employees. SBUA does not seek intervenor compensation for these unnamed SBUA employees.</p> <p>For the reasons set forth below, the Commission reduces SBUA’s claimed hours to reasonably reflect the hours necessary to prepare the documents and undertake the work performed that resulted in the substantial contribution provided. As stated above and as reflected in all recent decisions on intervenor compensation, making a substantial contribution in and of itself does not entitle an intervenor to all its claimed fees and costs.</p> <p style="text-align: center;">(1) SBUA’s Request for Compensation for Work by Multiple Attorneys at E&E Law Is Excessive, Inefficient, Duplicative, and Unreasonable</p> <p>SBUA claims hours for compensation based on timesheet entries from E&E Law of consultants Strauss and Birkelund. SBUA’s claim</p>

Item	Reason
	<p>for compensation fails to support the need for two experienced attorneys to prepare and review the limited number of short documents offered by SBUA this proceeding. Either attorney, by themselves, could have handled this proceeding and, as such, SBUA’s request for compensation for two experienced attorneys is excessive, duplicative, inefficient, and unreasonable based on SBUA’s minimal level of work product, consisting of eight pages of opening testimony and two pages of rebuttal testimony plus participation in settlement discussions. In this respect, the Commission finds that SBUA’s contribution cannot in its entirety be reasonably found to be a “substantial contribution.”⁵</p> <p>To reasonably align SBUA’s limited substantial contribution to its limited substantive participation, the Commission removes the hours requested by SBUA on the timesheet entries from E&E Law by consultant Birkelund (32.75 hours for Birkelund’s work).⁶</p> <p style="text-align: center;">(1.1) Based on the Qualification of Lead Attorney Strauss, Compensation for Multiple Attorneys is Unreasonable</p> <p>SBUA relied upon a consultant, Strauss with E&E Law, as its lead attorney (36.25 hours) in this proceeding.</p> <p>In this claim, SBUA describes Strauss’ qualifications, as follows: “SBUA assigned primary responsibility to mid/senior-level attorney, Ariel Strauss. Mr. Strauss has represented SBUA in several wildfire cost reasonableness review proceedings, including SCE’s equivalent application for the previous two years (2021 and 2022) and Pacific Gas & Electric’s wildfire-related cost recovery application (A.24-11-009), PacifiCorp’s CEMA application (A.24-09-004), San Diego Gas & Electric’s GRC Track II (A.22-05-016), and SCE’s 2025 GRC. Mr. Strauss brings extensive experience with the facts and issues in this application that allowed for efficient identification and resolution of issues here.”</p> <p>According to SBUA, Strauss is well-versed in the topics presented in this proceeding and has worked on multiple similar proceedings. Based on Strauss’ experience and SBUA’s supportive statements regarding the qualifications of consultant Strauss, the Commission</p>

⁵ See, e.g., Pub. Util. Code § 1802(j), § 1803(a), § 1803.1(a), and D.98-04-059.

⁶ Because the Commission does not award compensation for Birkelund’s hours, it is not necessary to determine an hourly rate for Birkelund in this proceeding.

Item	Reason
	<p>finds that SBUA’s request for compensation for an additional attorney from E&E Law, Birkelund, for an additional 32.75 hours at approximately \$830 per hour, is unreasonable as unnecessarily duplicative.</p> <p style="text-align: center;">(1.2) Based on the Limited Level of SBUA’s Substantive Participation, Additional Compensation for E&E Law Consultant Birkelund is Unreasonable</p> <p>In reviewing the level of substantive participation by SBUA, i.e., SBUA presented a total of 10 pages of substantive documents in the form of written testimony, together with participation in settlement discussions/review of documents, the skill level of SBUA’s participation falls well within consultant Strauss’ capabilities, as described above by SBUA. As such, it is reasonable to find that the additional 32.75 hours by Birkelund represents inefficiencies because this work was not reasonably required to produce the limited substantive level of SBUA’s participation in this proceeding.</p> <p style="text-align: center;">(1.3) Compensation to SBUA for E&E Law Consultant Birkeland Was Not Reasonably Required for SBUA Management of E&E Law Consultant Strauss</p> <p>To the extent consultant Strauss needed to collaborate with SBUA’s management to, for example, obtain SBUA’s policy direction or seek direction/input from SBUA’s management, “SBUA has weekly calls between its employees and outside counsel to discuss case strategy and development.” (December 17, 2025 Supplement at 9.) Additionally, SBUA confirms that its executive director provides management of policy direction, stating “The Executive Director provided day-to-day strategic oversight over this proceeding and conferred with the other members of the board during regular board meetings, and as needed.” (December 17, 2025 Supplement at 10.)</p> <p>As such, SBUA directly and regularly provided management and policy direction to consultant Strauss during this proceeding, and it is reasonable for the Commission to find that it is excessive and unnecessary for SBUA to also seek compensation for consultant Birkeland to provide management or policy direction to Strauss. This additional compensation sought by SBUA reflects duplicate efforts by SBUA or duplicate efforts by consultant Strauss to communicate with SBUA.</p>

Item	Reason
	<p>For all these reasons in 1.1 through 1.3 above, the Commission finds SBUA’s request for compensation for the E&E Law consultant Birkelund for 32.75 hours unreasonable, excessive, and duplicative based on SBUA’s limited participation in this case and the reasonable expectation that SBUA should communicate policy and management directly with the lead attorney from E&E Law, Strauss (as indicated by the timesheets).</p> <p style="text-align: center;">(2) Total Reductions</p> <p>Based on the reasonings stated above, we make the following reductions:</p> <ul style="list-style-type: none"> • 2024 Birkelund: 8.00 hours reduced • 2025 Birkelund: 24.75 hours reduced
<p>[2] Strauss’ 2024 and 2025 Hourly Rates and Intervenor Compensation Claim Preparation Hourly Rates (consultant with E&E Law)</p>	<p>SBUA confirms that Strauss is a consultant (rather than an employee) with E&E Law. Pursuant to Commission policy, the rate requested by SBUA must not exceed the rate billed to that intervenor by any outside consultant it hires, even if the consultant’s billed rate is below the floor for a given experience level.⁷ Per the <i>IComp Program Guide</i> at page 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award.⁸ Moreover, a consultant contract cannot hinder the ability of the Commission to evaluate whether intervenors are fully complying with the law. At Part III.B, herein, the Commission states: “Intervenor’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.”</p> <p>While SBUA purports to provide all the information requested by the Commission pertaining to this claim, SBUA simultaneously objects to the provision of the request information, as detailed in its December 17, 2025 Supplement. SBUA’s objection lacks merit.</p>

⁷ D.07-01-009, D.08-04-010, and Resolution ALJ-235.

⁸ Pub. Util. Code § 1804(d).

Item	Reason
	<p>2024 Hourly Rate</p> <p>The Commission utilizes the reasonable rates established by Resolution ALJ-393 based on consultant Strauss’ experience as a Legal — Attorney — Level III.</p> <p>Given that the 2024 rate range for a Legal — Attorney — Level III is \$360.71 to \$570.43, we find the requested 2024 hourly rate of \$530.00 to be reasonable and adopt it here.</p> <p>2024 Intervenor Compensation Claim Preparation Hourly Rate</p> <p>We apply one-half of consultant Strauss’ 2024 hourly rate of \$530.00 for a 2024 Intervenor Compensation Claim Preparation rate of \$265.00.</p> <p>2025 Hourly Rate</p> <p>Given that the 2025 rate range for a Legal — Attorney — Level III is \$376.79 to \$586.51, the Commission finds the requested 2024 hourly rate of \$550.00 to be reasonable and adopt it here.</p> <p>2025 Intervenor Compensation Claim Preparation Hourly Rate</p> <p>We apply one-half of Strauss’ 2025 hourly rate of \$550.00 for a 2025 Intervenor Compensation Claim Preparation rate of \$275.00.</p> <p>The award determined herein for Strauss’ contribution in this proceeding shall be paid in full to Strauss, and no portion of this part of the award shall be kept by SBUA. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission’s policy on consultant compensation, and the understanding that the consultant has not billed or collected compensation for the work performed until the final award is given.</p>
<p>[3] Claim for Intervenor Compensation -Inefficiency in Preparing the SBUA’s Claim</p>	<p>The Commission awards intervenor compensation to intervenors for reasonable and efficient participation that contributes to the development of the record and aids in decision-making. SBUA’s consultant, E&E Law, claimed hours/costs for preparing SBUA’s intervenor compensation claim filed in this proceeding. A review of E&E Law’s time entries for preparation of this intervenor compensation claim reflects inefficiency. Together consultants</p>

Item	Reason
	<p>Strauss and Birkelund spent approximately 15 hours on preparing SBUA’s intervenor compensation claim and NOI, with consultant Strauss recording 8.3 hours and consultant Birkelund recording 5.25 hours to edit the work of consultant Strauss.</p> <p>The Commission reduces these hours for the following reasons.</p> <p>Consultant Strauss has prepared numerous intervenor compensation claims over the years. Regarding this claim, the majority of the substantive portion of the claim involved the same text that was copied/pasted several times to complete the claim. Based on the copy/paste format of this intervenor compensation claim, it is reasonable to reduce the 8.3 hours of consultant Strauss that SBUA requests at approximately \$275 per hour to 4.4 hours.</p> <p>SBUA requests compensation for a second consultant from E&E Law, Birkelund, for 5.25 hours to “edit” the work of consultant Strauss. SBUA requests approximately \$415 per hour for consultant Birkelund’s work editing the work of consultant Strauss. Having prepared numerous intervenor compensation claims and NOIs, Strauss holds a high level of expertise in preparing intervenor compensation claims. As such, it is reasonable to expect that edits to his work would be minimal or unnecessary.</p> <p>As such, it is reasonable to find that the hours sought by SBUA for E&E Law consultant Birkelund of 5.25 hours to edit the intervenor compensation claim and NOI prepared by consultant Strauss reflects inefficiencies and is reduced to zero hours. Because the Commission does not award SBUA for any Birkelund hours for intervenor compensation work, it is unnecessary to determine an hourly rate for Birkelund’s intervenor compensation claim preparation work.</p> <ul style="list-style-type: none"> • 2024 and 2025 Strauss: 4.4 hours awarded (8.3 hours requested) • 2024 and 2025 Birkelund: 0.00 hours awarded (5.25 hours requested)
<p>The Commission’s requests for information regarding Intervenors</p>	<p>The Commission has authority to audit intervenors’ books and records to verify the basis for any intervenor compensation award. SBUA suggests that the authority of the Commission to request information is limited. (SBUA December 17, 2025 Supplement).</p> <p>At page 2 of its December 17, 2025 Supplement, SBUA responds, in part, to question by the Commission as follows: “to the extent the [Commission] inquiries seek information that is not legally required</p>

Item	Reason
	<p><i>under the Public Utilities Code or applicable intervenor compensation requirements, SBUA objects.”</i></p> <p>The Commission has consistently stated in decisions awarding intervenor compensation, intervenors must ensure full transparency regarding actual time spent on issues, consultant fees, payment arrangements, and the actual disbursement of funds. Failure to meet this obligation undermines the integrity of the compensation process and may lead to denial of claims or further enforcement action. Intervenors therefore must be truthful in all their representations to the Commission, including, but not limited to, their arrangements with outside consultants, the amounts billed by outside consultants, the amounts actually paid by the intervenors to outside consultants, that the intervenors will not derive any profit or retain any portion of an award given for outside consultants’ work, and that the intervenors have made their best efforts to require outside consultants to work efficiently and minimize ratepayer costs.</p>
<p>Intervenor Responsibility for Transparency and Accuracy in Compensation Requests</p>	<p>The Commission takes this opportunity to remind all intervenors that they bear the burden of providing accurate, complete, and honest information in all compensation requests. The Commission relies on intervenors’ good faith representations, particularly regarding consultant agreements and payments, as it does not have the resources to review every contract or non-standard arrangement in detail.</p> <p>Intervenor compensation is funded by ratepayers, and the Commission takes seriously any effort to mislead or obscure the financial basis for a claim. Although no violation of Rule 1.1 has been found in this instance, we remind intervenors that under Rule 1.1, intent to deceive is not required for a violation, misstatements may still be actionable. Dishonest or misleading claims not only risk denial of compensation but may also subject the intervenor to penalties.</p> <p>The Commission has clear authority to audit intervenors’ books and records to verify the basis for any award. Intervenors must therefore ensure full transparency regarding actual time spent on issues, consultant fees, payment arrangements, and the actual disbursement of funds. Failure to meet this obligation undermines the integrity of the compensation process and may lead to denial of claims or further enforcement action.</p>

PART IV: OPPOSITIONS AND COMMENTS
Within 30 days after service of this Claim, Commission Staff
or any other party may file a response to the Claim (see § 1804(c))

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

If not:

Party	Comment	CPUC Discussion

FINDINGS OF FACT

1. SBUA participated in settlement discussions and submitted the following written documents in the proceeding: (1) a motion for party status, (2) eight pages of opening testimony and (3) two pages of rebuttal testimony. The written testimony was of minimal impact as the reasoning was vague and not well-developed.
2. SBUA’s claimed hours are reduced for purposes of compensation to reasonably reflect the hours commensurate with the work produced.
3. The SBUA claim for compensation does not support the need for two experienced attorneys to prepare and review the same short documents offered in this proceeding.
4. SBUA’s requested hours are excessive for the limited level of substantive analysis and work products presented, and SBUA’s contribution cannot in its entirety be found reasonable.
5. Strauss’ experience and SBUA’s supportive statements regarding Strauss’ qualifications demonstrate that an additional attorney from E&E Law, Birkelund, for an additional 32.75 hours is unnecessarily duplicative.
6. The skill level of SBUA’s participation falls well within E&E Law consultant Strauss’ capabilities, as described by SBUA.
7. The 32.75 hours by E&E Law consultant Birkelund for which SBUA seeks compensation represents inefficiencies because this additional work was not reasonably required to produce SBUA’s limited participation in this proceeding.

8. SBUA directly and regularly provided management and policy direction to E&E Law consultant Strauss and it is excessive and unnecessary for SBUA to also seek compensation for E&E Law consultant Birkeland to provide management and policy direction because this additional compensation reflects duplicate efforts by SBUA or duplicate efforts by consultant Strauss to communicate with SBUA.
9. E&E Law consultant Strauss has prepared numerous intervenor compensation claims.
10. The majority of the substantive portion of SBUA's claim involved the same text that was copied/pasted several times to complete the claim.
11. Based on the copy/paste format of this SBUA intervenor compensation claim, it is reasonable to reduce the 8.3 hours charged by consultant Strauss for preparation of its claim and NOI to 4.4 hours.
12. SBUA requests compensation for a second consultant from E&E Law, Birkelund, for 5.25 hours to "edit" the work of consultant Strauss who prepared the intervenor compensation claim and NOI.
13. Having prepared numerous intervenor compensation claims and NOIs, E&E Law consultant Strauss holds a high level of expertise in preparing intervenor compensation claims and, such, it is reasonable to expect that edits to Strauss' work on claims and NOIs would be minimal or unnecessary.
14. SBUA made a substantial contribution in some aspects to D.25-06-017.
15. The requested hourly rates for SBUA's consultant is comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services, and/or reflect the actual rates billed to, and paid by the intervenor, for consultant services rendered.
16. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
17. The total of reasonable compensation is \$23,066.00.

CONCLUSION OF LAW

1. In evaluating whether SBUA made a substantial contribution to D.25-06-017, the Commission evaluates whether the hours claimed by SBUA were commensurate with the substantial contributions.
2. Making a substantial contribution in and of itself does not entitle an intervenor to all its claimed fees and costs. Compensation is granted for efficient, meaningful contributions.

3. It is reasonable that either of the two experienced attorneys, by themselves, could have handled this proceeding and, as such, SBUA's request for compensation of two experienced attorneys is excessive, duplicative, inefficient, and unreasonable based on SBUA's minimal level of work produced in this proceeding, consisting of eight pages of opening testimony and two pages of rebuttal testimony plus participation in settlement discussions.
4. Based on SBUA's minimal level of contribution in this proceeding, SBUA's requested hours for compensation are excessive.
5. Under the law, SBUA's contribution cannot reasonably be found in its entirety a "substantial contribution."
6. To reasonably align SBUA's limited substantial contribution to its limited substantive participation, the hours requested by SBUA for compensation on the timesheet entries from E&E Law by consultant Birkelund (32.75 hours for Birkelund's work at approximately \$830 per hour) should not be awarded.
7. SBUA's request for compensation for an additional attorney from E&E Law, Birkelund, for an additional 32.75 hours is unnecessarily duplicative.
8. The 32.75 hours by E&E Law Birkelund for which SBUA requests compensation represents inefficiencies because his additional work was not reasonably required to produce the limited level of SBUA's participation in this proceeding.
9. It is excessive and unnecessary to award SBUA compensation for E&E Law consultant Birkeland to provide management and policy direction because this additional compensation reflects duplicate efforts by SBUA or duplicate efforts by E&E Law consultant Strauss who was directly communicating with SBUA.
10. It is reasonable to expect that edits to consultant Strauss' work in preparing the intervenor compensation claim and NOI would be minimal or unnecessary based on Strauss' level of experience in preparing such documents and, as such, it is reasonable to find that the hours sought for compensation by SBUA for E&E Law consultant Birkelund of 5.25 hours to edit the intervenor compensation claim and NOI prepared by consultant Strauss reflects inefficiencies and should be reduced to zero hours.
11. Because SBUA is not awarded compensation for the hours requested for the work of Birkelund, it is unnecessary to determine an hourly rate for Birkelund in this proceeding.
12. The claim, with the reduction set forth above, satisfies the requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. Small Business Utility Advocates is awarded \$23,066.00.

2. Within 30 days of the effective date of this decision, Southern California Edison Company shall pay Small Business Utility Advocates the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning October 29, 2025, the 75th day after the filing of Small Business Utility Advocates' request, and continuing until full payment is made.
3. The comment period for today's decision is not waived.
4. Application 24-04-005 is closed.

This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX A

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D2506017		
Proceeding(s):	A2404005		
Author:	ALJ DeAngelis		
Payer(s):	Southern California Edison Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/ Disallowance
Small Business Utility Advocates	August 15, 2025	\$53,260.00	\$23,066.00	N/A	See Part III.D CPUC Comments, Disallowances and Adjustments

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Ariel	Strauss	Attorney/Consultant ⁹	\$530	2024	\$530.00
Ariel	Strauss	Attorney/Consultant ⁹	\$550	2025	\$550.00
James	Birkelund	General Counsel/ ¹⁰ Consultant	\$800	2024	N/A
James	Birkelund	General Counsel/Consultant	\$830	2025	N/A

(END OF APPENDIX A)

⁹ Strauss is a consultant as noted in Part III.D, Item [1].

¹⁰ Birkelund is a consultant as noted in Part III.D, Item [2].