



PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

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June 9, 2026

Agenda ID #24280
Ratesetting

TO PARTIES OF RECORD IN APPLICATION 23-05-010 and APPLICATION 22-05-013:

This is the proposed decision of Administrative Law Judge's Colin Rizzo, ALJ Ehren Seybert, and ALJ Rafael Lirag. 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 2, 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: jds

Decision **PROPOSED DECISION OF ALJ’S RIZZO, SEYBERT, AND LIRAG**
(Mailed 6/9/2026)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (U 338-E) For Authority to Increase Its Authorized Revenues for Electric Service In 2025, Among Other Things, and to Reflect That Increase in Rates.	Application 23-05-010 (Filed May 12, 2023)
NOT CONSOLIDATED	
Application of Southern California Edison Company (U 338-E) Regarding 2022 Risk Assessment Mitigation Phase.	Application 22-05-013 (Filed May 13, 2022)

DECISION GRANTING COMPENSATION TO SMALL BUSINESS UTILITY ADVOCATES FOR SUBSTANTIAL CONTRIBUTION TO DECISION (D.) 23-11-007 AND D.25-09-030

Intervenor: Small Business Utility Advocates	For contribution to Decision (D.) 25-09-030 and D.23-11-007
Claimed: \$299,762.00	Awarded: \$151,100.50
Assigned Commissioner: Karen Douglas ¹	Assigned ALJs: Colin Rizzo, Ehren Seybert, Rafael L. Lirag

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	Decision 25-09-030 approved the 2025 test year base revenue and post-test year revenue requirements for Southern California Edison Company’s (SCE) General Rate Case (GRC). D.23-11-007 closed SCE’s 2022 Risk Assessment Mitigation Phase (RAMP) proceeding, a process that informed SCE’s 2025 GRC application. The RAMP submission relied on in the GRC provided a detailed presentation of SCE’s
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¹ Commissioner Karen Douglas was assigned to A.22-05-013 on April 22, 2026.

	enterprise-wide risks, its risk model, risk spend efficiency methodology, and its plans to mitigate these risks.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812²:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	08/15/22	Verified in A.22-05-013. In A.23-05-010 the PHC was held on 7/12/23.
2. Other specified date for NOI:		
3. Date NOI filed:	09/14/22	9/13/22 in A.22-05-013 and 7/31/23 in A.23-05-010.
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	A.22-02-005
6. Date of ALJ ruling:	06/03/24	8/2/22
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	A.23-10-001	A.22-02-005
10. Date of ALJ ruling:	06/03/24	8/2/22
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes

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

	Intervenor	CPUC Verification
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.25-09-030; D.23-11-007	Verified
14. Date of issuance of Final Order or Decision:	09/23/25; 11/15/23	Verified
15. File date of compensation request:	11/24/25	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Intervenor’s Comment(s)	CPUC Discussion
B.13-15	In the RAMP proceeding, D.23-11-007 provides that “[i]ntervenors in this proceeding should be allowed to carry forward hours and costs to A.23-05-010 [the General Rate Case].” D.23-11-007 at 16 (Conclusion of Law #9).	Noted. Ordering Paragraph 3 of D.23-11-007 stated “Intervenors are allowed to carry forward hours and costs in this proceeding to Application 23-05-010.”
B.15	60 days from the date of issuance of D.25-09-030, closing the GRC proceeding, is Saturday, 11/22/25, with the result, that per Rule 1.15, this claim is due on Monday, 11/24/25.	Noted

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
1. Targeted Undergrounding SBUA presented testimony and discovery objecting to SCE’s zero-risk tolerance approach to targeted undergrounding (TUG), unrealistic work	SBUA’s analysis and positions are cited to extensively in the Decision and identified as supporting the Commissions approach of approving a version of The Utility	We verify that SBUA’s citations are correct. However, we note that it is an

<p>timeline, cost estimates inconsistent with SCE’s own difficulty categorizations, costs far in excess of PG&E’s costs without justification, lack of prioritization of the highest risk and most de-energized segments and failure to consider less costly alternatives, while recommending that a two-balancing account be established to enable SCE to seek reasonableness review of additional undergrounding. (See SBUA-01 at 17-28; SBUA-02R at 3-5; SBUA-03 and SBUA-04 (data responses); SBUA Opening Brief (OB) at 17-28; SBUA Reply Brief (RB) at 7-11.) SBUA also opposed positions SCE espoused in response to the Proposed Decision (PD), including to approve undergrounding of 350 miles, underground additional miles in high-wind areas, 81 miles in the Altadena and Malibu fire-damaged areas and retain any unspent funds to perform additional undergrounding. (SBUA Reply Comments (RC) to PD at 2-7; Oral Argument Transcript at 1638-39.)</p>	<p>Reform Network’s (TURN) recommendation by undergrounding the 212 miles of the highest risk circuits in place of SCE’s requested 685 miles, at a cost savings of approximately \$2 billion (<i>id.</i> at 362-63, 383) and establishing a new two-way Grid Hardening Balancing Account for TUG as proposed by SBUA. (<i>Id.</i> at 449.) The Commission also rejected the proposals SCE made after release of the PD, which SBUA opposed. (<i>See, e.g., Id.</i> at 859.)</p> <p>Public Utilities Code section 1802.5 provides that an intervenor that “materially supplements, complements, or contributes to the presentation of another party, including the commission staff, may be fully eligible for compensation[.]”</p>	<p>overstatement for SBUA to claim that it was cited “extensively” regarding the targeted undergrounding (TUG) issue. This is evidenced by D.25-09-030 citing SBUA just three times in the TUG section. In two of those instances SBUA is mentioned along with other parties as having a similar position.</p> <p>We also note that D.25-09-030 took issue with “SBUA’s comparisons to PG&E’s unit cost forecast for undergrounding” because SBUA did “not account for location specific differences in topography, region, population density, and other factors, or speak to PG&E’s actual unit costs for undergrounding. Further, SBUA</p>
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		<p>[did] not provide an alternative TUG unit cost.”³</p> <p>We further note that SBUA’s main preference would have been for the Commission to deny Southern California Edison’s (SCE) TUG proposal but would “accept” an alternative such as The Utility Reform Network’s (TURN).⁴</p> <p>Based on the above discussion, we find that SBUA’s substantial contributions on the TUG issue were limited and the over 110 hours claimed on this issue are excessive. <i>See</i> Part III.D.</p>
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³ D.25-09-030 at 380.

⁴ *See* SBUA’s Opening Brief at 24 (“SCE’s TUG as proposed should be denied. If it is approved, it should be funded at a dramatically reduced cost.”) and SBUA’s Reply Brief at 11 (“While SBUA recommends that SCE’s application should be denied, in part because there is no indication that the 580 miles proposed for TUG are particularly not susceptible to mitigation through conventional means, SBUA, nevertheless, accepts an alternative that focus undergrounding on only the riskiest tier of miles is preferable.” (citations omitted)).

<p>2. Transportation Load Growth Capital</p> <p>SBUA opposed SCE’s request for \$200.42 million in Transportation Electrification Grid Readiness (TEGR) project spending and instead recommended that spending be kept at the base-level. Specifically, SBUA argued that SCE did not demonstrate its ability to forecast where projects will be needed or execute this level of spending efficiently. However, given that transportation electrification is occurring and small businesses will need ways of charging medium duty (MD) vehicles, SBUA proposed that SCE should be authorized to implement a balancing account to seek reasonableness review of expenditures beyond the base level. (SBUA-01 at 9-10; SBUA-01, Attach. 3 (<i>California Small Business EV Charging Needs Assessment Final Report</i>); SBUA RB at 2-5.) SCE had opposed a balancing account in briefing. (SCE Opening Br. at 143; SCE Reply Br. at 44-47.) In comments on the Proposed Decision, SBUA recommended that additional reporting be required to “a) Include expanded MDHD vehicle analysis population data; b) specifically demonstrate that the work is necessary to support appropriately forecasted TE load growth, competently selected in the right location and must be initiated prior to the next GRC; and c) report on lower cost alternatives non-wires mitigations, such as efficiency upgrades, increased</p>	<p>The Decision summarized SBUA’s positions (Decision at 232), which provided support for the Commission’s approach of approving 50% of SCE’s request (i.e., \$100.21 million) and allowing recovery by memorandum account. (<i>Id.</i> at 241).</p> <p>The PD did not include a discussion of the reporting that would be required in connection with advice letter reporting and reasonableness review. (PD at 242-43.) Consistent with SBUA’s recommendations in comments on the PD, the PD was revised to include specific reporting requirements, including “what customer types are anticipated to benefit from the project (e.g., LD public charging, MDHD public charging, port customers, etc.)” (Dec. at 242; FOF No. 148-49.)</p> <p>In line with SBUA’s arguments, the Commission declined to allow SCE to seek recovery for non-transportation energization investments.</p> <p>Substantial contribution includes where a “decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the</p>	<p>We verify SBUA’s citations are correct with the following exceptions:</p> <p>(1) SBUA-01 does not state that “small businesses will need ways of charging medium duty (MD) vehicles” in SBUA-01,⁵</p> <p>(2) SBUA’s citation to a transportation electrification balancing account are actually in reference to a vegetative management balancing account,⁶ and</p> <p>(3) SCE’s Opening Brief at 143 and Reply Brief at 44-47 do not state opposition to a balancing account proposed by SBUA.</p>
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⁵ “While SCE discusses the growing needs of medium and heavy-duty transportation electrification loads, a recent SBUA-sponsored survey indicates that small businesses predominantly utilize light duty vehicles and require significant technical and financial assistance to adopt [transportation electrification] infrastructure.” Direct Testimony of Theodore Love on Behalf of Small Business Utility Advocates (SBUA-01) at 10.

⁶ *Id.* at 29 and SBUA’s Opening Comments on the Proposed Decision at 8, filed on August 19, 2025.

<p>storage, education/outreach and super off peak TOUs.” (SBUA Opening Comments (OC) on PD at 6-8; <i>see also</i> Oral Argument Transcript, 1639, ln. 7-16.) SBUA also objected to SCE’s request, first presented at oral argument, to expand recovery beyond transportation electrification-specific investments. (SBUA OC on PD at 7.)</p> <p>In contrast with SBUA, industry-affiliated parties, Coalition of Utility Employees (CUE), Natural Resources Defense Council (NRDC) and SCE argued for approval of SCE’s request for \$200.42 million TEGR project funding. While opposing funding, TURN argued that if any funding was approved, it should be in a one-way balancing account. (Decision at 229, 231.)</p>	<p>[intervenor].” (Pub. Util. Code § 1802(j).)</p>	
<p>3. Vegetation Management</p> <p><u>Routine Inspections-Remote Sensing</u> SBUA opposed funding SCE’s request to rapidly shift to full remote sensing across its territory, arguing that SCE did not establish that it would be able to ramp up remote sensing at the proposed scale or that the shift to remote sensing would achieve the asserted savings. (SBUA-01 at 11-12; Evidentiary Hearings (EH) Transcript at 1350-51, 1355-56; RB at 8; SBUA OC on PD at 8.)</p> <p><u>Vegetation Management Vendor Practices and Rates</u> Given SCE’s significant history of massive VMBA vendor cost overruns in 2021 and 2022, SBUA engaged in discovery and cross examination</p>	<p><u>Routine Inspections-Remote Sensing</u> The Decision (p. 306) described approvingly SBUA’s position and adopted SBUA’s recommended approach: “we find it prudent to take a more cautious approach that will allow SCE to continue to explore and validate remote sensing as a substitute for traditional ground inspections at a much larger scale.” (Decision at 310-113.)</p> <p><u>Vegetation Management Vendor Practices and Rates</u> The Decision recounts SBUA’s investigation into SCE’s positive changes in vendor practices in light</p>	<p>We verify SBUA’s remote sensing citations are correct with the exception that SBUA did not present a unique recommendation for scaling back SCE’s remote sensing request.⁷</p> <p>We note that SBUA’s comments questioning SCE’s 15%</p>

⁷ The only recommendation mentioned in SBUA’s remote sensing claimed contributions is one from Cal Advocates, which SBUA stated it supported. SBUA’s Reply Brief at 8 (citing Cal Advocates’ Opening Brief at 225).

<p>regarding SCE’s VMBA vendor contracting practices. SBUA was able to show by information not included in SCE’s prepared testimony, that SCE had adopted important improvements to its contracting practices. (<i>See</i> SBUA-01 at 12-13, 14-15; SBUA-05; EH Transcript at 1363-68; SBUA OB at 13-14; SBUA OC on PD at 7.)</p> <p>However, SBUA developed the record regarding ongoing vendor unionization and SCE’s having not undertaken any market analysis to assess the potential impact of unionization; SBUA criticized SCE’s 15% escalation factor as unreliable due to a history of substantial cost increases following past unionization. (SBUA-01 at 13; EH Transcript at 1359-61; SBUA OB at 14-16; OC on PD at 7-8.) SBUA asserted that this created a significant risk that SCE did not account for foreseeable cost increases, and by raising this issue in the GRC, SBUA created a record that could avoid SCE establishing that cost overruns were “reasonable” in any future application, as occurred in 2021 and 2022. (SBUA OB at 13.)</p> <p>SBUA’s <i>ex parte</i> and opening comments on the PD resulted in the removal of erroneous endorsement of SCE’s contention that intervenors cannot raise legal or policy positions in opening briefs, such as that SCE failure to conduct a market study makes its vendor escalation unreliable. (SBUA <i>Ex Parte</i> Report, Aug. 27, 2025; SBUA OC on PD at 8-9.)</p>	<p>of its history of vegetation management vendor cost overruns. (<i>Id.</i> at 305-06, 308, 314.) While the Decision rejected SBUA position that a lack of a market study amid ongoing unionization indicated that SCE likely understated cost increases such that the Commission should question the reasonableness of future vendor cost overruns, the Commission cited to SBUA’s materials to support the conclusion that SCE did not establish the reliability of its 15% VMBA labor escalation rate and instead adopted TURN’s 6% proposal. (<i>Id.</i> at 340-41.) Additionally, the Commission utilized SBUA’s contribution regarding unionization to support its decision to continue to allow the VMBA to function as a two-way balancing account, contrary to TURN’s proposal. (<i>Id.</i> at 355 (“while no party presented evidence in this proceeding demonstrating the magnitude of vegetation management cost increases following possible unionization of the contract workforce, it is possible that such unionization could lead to future cost increases.”).) Contribution to a decision does not turn on whether or not the Commission approves the party’s preferred position but whether the Commission adopted any factual or legal contentions, in whole or in part, that support the decision.</p> <p>The Commission also revised the PD to eliminate statements that SBUA raising issue with SCE’s lack of a market study in opening</p>	<p>escalation factor did not propose a different factor but leaned towards increasing it instead of the 6% decrease adopted by D.25-09-030.⁸</p>
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⁸ “SBUA also asserts SCE’s near-term vendor labor costs are dramatically understated, since SCE’s proposed 15 percent escalation factor does not consider possible unionization.” D.25-09-030 at 306.

<p><u>Environmental Support Costs</u> SBUA demonstrated the factors that were and were not considered by SCE in order to create a record that would reduce the risk of SCE claiming the reasonableness of cost overruns in future years, as had occurred in the past. (SBUA-01 at 16; SBUA OB at 2, 11-13; SBUA RB at 7-8.) SBUA also confirmed that SCE’s Environmental Services costs stipulation (SCE-30) included “positions that provide oversight of O&M field work for vegetation management and programmatic activities related to vegetation management” and will “not be tracked or recorded in SCE’s various currently-established wildfire mitigation memorandum accounts or the Vegetation Management Balancing Account (VMBA) in the 2025 GRC rate case cycle.” (SBUA-08.)</p> <p><u>Balancing Account</u> SBUA argued that SCE should not be allowed to continue to automatically exceed its cost allowance with reasonableness review. (SBUA-01 at 9; SBUA OB at 33-34; SBUA RC on PD at 1-2.)</p>	<p>briefs was improper. (<i>See</i> PD at 501; PD Findings of Fact 204 and 431.) This change corrected an erroneous position regarding the burden of proof and standards of fairness.</p> <p><u>Environmental Support Costs</u> The Commission did not adopt SBUA’s request to take a position on the recovery of future environmental cost overruns. (Decision at 348-49.) The Decision did confirm SCE-30, which was supported by SBUA in briefs, noting that “no party opposed the stipulations[,]” which occurred because SBUA obtained appropriate clarification and assurances from SCE in SBUA-08 that SCE would not be seeking recovery of any cost overruns associated with environmental support, which achieved SBUA’s objective of protecting customers from what occurred in 2021 and 2022. (<i>Id.</i> at 676.) Given SCE’s history of massive environmental overruns, SBUA submits that its investigation and advocacy was appropriate and a valuable addition to the record.</p> <p><u>Balancing Account</u> SCE argued that the existing 115% reasonableness threshold should be retained or increased while TURN argued that the VMBA should be turned into a one-way balancing account. (<i>Id.</i> at 298.) “SBUA does not contest continuation of the VMBA but opposes SCE’s proposal to increase the reasonableness threshold.” (<i>Id.</i> at 353.) As requested by SBUA, the</p>	<p>We find that SBUA did not substantially contribute to the decision-making process on this sub-issue and was not a valuable addition to the record.</p> <p>We note that Cal Advocates also opposed an increase to the reasonableness threshold⁹ and that SBUA concurred with TURN’s</p>
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⁹ D.25-09-303 at 352.

	<p>Commission eliminated the 115% threshold, subjecting millions of dollars to reasonableness review and discouraging cost overruns. (<i>Id.</i> at 354-55; Finding of Fact No. 262; Conclusion of Law No. 180.)</p>	<p>position on this issue.¹⁰</p>
<p>4. Wildfire Management</p> <p>Given the size and safety significance of wildfire management, SBUA evaluated SCE’s grid hardening and wildfire management proposals (<i>see, e.g.</i>, SBUA-09) with a particular focus on aspects not sufficiently addressed by other parties, namely SCE’s remote grid pilot, aerial suppression program and balancing account treatment.</p> <p><u>Remote Grid Pilot</u> SBUA raised several objections to the scope, timing, lack of consideration of batteries and alternatives of SCE’s proposed remote grid pilot. (SBUA-01 at 25-27; SCE-24 (SBUA expert data response to SCE); EH Transcript at 975-77; SBUA OB at 27; SBUA RB at 10-11; SBUA OC on PD at 14-15; SBUA RC on PD at 8.)</p>	<p><u>Remote Grid Pilot</u> The Commission considered SBUA’s concerns, and while declining to implement several of SBUA’s recommendations, recognized SBUA contributions:</p> <p>“SBUA raises a valid potential concern regarding the general timing of the study. Given that over 90 percent of SCE’s HFRA’s are expected to be hardened by the end of 2028, one additional key consideration SCE should take into account when selecting the site locations is whether covered conductor is expected to be deployed at any of the remote grid study locations prior to the release of the study results, so that the study may be used to inform any further grid hardening activities at these locations. In addition, SCE states the remote grid study will indicate ‘whether remote grid is</p>	<p>D.25-09-030 found “many of SBUA’s arguments to be erroneous or without merit” regarding a remote grid pilot.¹¹</p>

¹⁰ SBUA’s Reply Comments on Proposed Decision at 2.

¹¹ D.25-09-030 at 405.

<p><u>Aerial Suppression</u> SBUA objected to SCE’s full funding of \$35 million annually in year-around fire suppression helicopters utilized by firefighting agencies without documenting the agencies’ inability to obtain funding from non-ratepayer sources. (SBUA OB at 16-17; SBUA RB at 5-6.)</p> <p><u>Balancing Account</u> SBUA objected to SCE’s proposal to increase or eliminate reasonableness threshold for wildfire balancing account. (SBUA-01 at 29.)</p>	<p>feasible and cost effective and determine the remote grid’s effectiveness as a mitigation strategy in lieu of undergrounding,’ and that the study locations are based, in part, on the locations where SCE found undergrounding to be infeasible. SCE does not explain how it intends to evaluate the cost-effectiveness of remote grids, but any cost-effectiveness evaluation should be based on actual, feasible alternatives (i.e., covered conductor and spacer cable).” (Decision at 404-06.)</p> <p><u>Aerial Suppression</u> While the Commission rejected SBUA’s proposals (Decision at 438-39), it was reasonable for SBUA to evaluate this program given that the Commission in D.24-03-008 (p. 42) directed that “[g]oing forward, SCE should thoroughly explain and justify its proposed use of ratepayer funds to fund standby leasing of helicopters[,]” and SBUA did not see that this had been done in SCE’s direct testimony.</p> <p><u>Balancing Accounts</u> Consistent with SBUA’s recommendation, the Decision shifts SCE’s two-way balancing account to a one-way account. (Decision at 449.)</p>	<p>We find that SBUA did not substantially contribute to the decision-making process of the aerial suppression sub-issue.</p> <p>SBUA’s listed citations do not state that it recommended a one-way balancing account.¹² We therefore find that SBUA did not substantially contribute to the decision-making</p>
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¹² “Given the size of the proposed TUG expenditure, I recommend that it be accounted for in 6 a separate two-way balancing.” Direct Testimony of Theodore Love on Behalf of Small Business Utility Advocates (SBUA-01) at 29.

	<p>Overall, SBUA’s evidence and analysis meaningfully contributed to the record and outcome concerning wildfire mitigation costs.</p>	<p>process on the balancing accounts sub-issue.</p> <p>We find that SBUA’s contributions to the wildfire management issue was minimal and make correlating reductions below in Part III.D.</p>
<p>5. Affordability & Equity</p> <p>SCE sought an increase of 22.15% over currently-authorized base rates. SBUA provided testimony on the impact of rate increases to small business customers, its equity implications the lack of current small business affordability metrics evaluating this problem and importance of SCE reporting the total bill impact of the application along with all in-process applications. (SBUA-01 at 2-5; SBUA OB at 7-8; SBUA RB at 1-2; SBUA OC on PD at 5; SBUA RC on PD at 1.)</p>	<p>The Decision discussed SBUA’s testimony and proposal and specifically recognized the relevance of SBUA’s contribution: “given SCE’s current and proposed rate levels, and considering our statutory obligations, we agree with intervenors that customer affordability is a critical factor to consider in this proceeding, and find the data and analysis presented by the parties to be a useful backdrop against which to evaluate SCE’s individual GRC requests.” (Decision. at 35.) Although the Decision declined to require SCE to implement a small commercial customer affordability metric in this proceeding or report on total bill impact (<i>see, id.</i> at 30-31, 44), SBUA submits that its advocacy on small business affordability is a valuable consideration and addition to the record.</p>	<p>D.25-09-030 found that SBUA’s comments on small business affordability metrics were outside the scope of the proceeding.¹³</p> <p>We find that SBUA’s other work on the affordability and equity issue did not amount to a substantial contribution to the decision-making process and was not a “valuable consideration and addition to the record.”</p>

¹³ D.25-09-030 at 34.

<p>6. Small Business Services</p> <p>SBUA evaluated SCE’s outreach to small businesses and small-business-focused program activities. (SBUA-01 at 5-7, 10-11; SBUA-03 at Q1-Q3; EH Transcript at 681-83.) SBUA confirmed Cal Advocates’ and TURN’s lack of consideration of small businesses when proposing cuts to small-business-serving programs. (SBUA-06 (confirming Cal Advocates did not do any analysis of small business needs before opposing small business-related program costs); SBUA-07 (accord for TURN); <i>see also</i> SBUA-02R at 2-3; SBUA OB at 9-11.) SBUA sought confirmation that SCE’s late stipulation with Cal Advocates and TURN to reduce Business Customer Services costs by \$2 million (SCE-26) would not reduce the level of service provided to small business customers. (<i>See</i> SBUA OB at 28-33; SBUA RB at 12; SBUA OC on PD at 11-14.)</p>	<p>The Decision rejected SBUA’s request that SCE conduct additional outreach activities to small business customers (Decision at 498-502) and that SCE implement a small business pilot in light of SCE having not documented outreach, surveying and analysis of small business needs: “we find SBUA’s proposed pilot would benefit from further development and stakeholder input in a separate application or rulemaking, and is premature to consider in this GRC proceeding.” (<i>Id.</i> at 508; <i>see also</i> 511.) However, the Decision confirmed that “we also agree with SBUA that the approximate \$2 million decrease stipulated to in Business Customer Services O&M, as compared to SCE’s rebuttal position, should not be seen as a corresponding reduction in the performance or provision of any of SCE’s Customer Service Activities.” (<i>Id.</i> at 501.)</p> <p>Significant SBUA’s time was expended in this proceeding reviewing and assessing SCE’s small business-related programming, which was necessary and appropriate to protect the interests of this customer segment, even if, ultimately, changes were not made to SCE’s expenditures.</p>	<p>We find that SBUA’s contributions to the small business services issue to be minimal. The majority of SBUA’s claimed contributions on this issue were found to be “without merit”¹⁴ or “premature to consider in this [General Rate Case] GRC proceeding.”¹⁵</p> <p>We therefore find that SBUA’s request for nearly 50 hours on this issue to be excessive and make a correlating reduction in Part III.D.</p>
<p>7. Risk Assessment Mitigation Phase</p> <p>SBUA analyzed SCE’s RAMP application, participated in workshops, and commented on the Safety Policy</p>	<p>D.23-11-007 (the RAMP Decision) recognizes that “SPD and intervenors identified deficiencies and areas for improvement,” (D.23-</p>	<p>We verify SBUA’s citations are correct. We note that SBUA</p>

¹⁴ *Id.* at 500.

¹⁵ *Id.* at 508.

<p>Division’s (SPD) evaluation report, focusing its advocacy on ensuring that RAMP issues adequately considered the interests of small business customers. SBUA made numerous recommendations, including, for example, on risk spend efficiency (RSE) methodology, discount rates, how “highly granular” risk tranches are aggregated into program-level risk mitigation evaluations, Public Safety Power Shutoff (PSPS) modeling, and integrating the RAMP recommendations into the GRC. (<i>See</i> SBUA Response to Application, June 13, 2022, at 3-4; SBUA Opening Comments on SPD Evaluation, Dec. 9, 2022, at 2-7; SBUA Response to ALJ Requested Briefing on Scoping, Aug. 22, 2022, at 1-3; SBUA Reply Comments on SPD Evaluation Report, Dec. 30, 2022, at 2-3, 7-8.)</p> <p>Overall, SBUA’s advocacy strengthened the record and ensured that small business customer interests were adequately addressed in SCE’s risk assessments and mitigation planning. The Commission’s final RAMP Decision ordered SCE to explicitly respond to concerns raised by parties, including SBUA, in its 2025 GRC Phase 1 application. SCE addressed SBUA’s RAMP concerns in its “RAMP Recommendations Roadmap” and in GRC testimony and workpapers, including testimony on RSE methodology, PSPS impacts by customer class, and risk-management practices.</p>	<p>11-007 at 1-2), and orders SCE to respond to issues raised by intervenors in its 2025 GRC Phase 1 application. (<i>Id.</i> at 16.) Attachment A to the RAMP Decision is SCE’s roadmap showing where in the GRC testimony each RAMP control or mitigation is discussed and where parties’ concerns, including those of SBUA, are addressed. (<i>Id.</i> at Att. A (RAMP Recommendations Roadmap). This roadmap identifies, for each recommendation, the corresponding “GRC Testimony Location Response.” (<i>Id.</i>; <i>see also</i> A.23-05-010, Ex. SCE-04, Vol. 5, Pt. 4 at 11-13, 37-38; Ex. SCE-01, Vol. 2, workpapers at 10-11.)</p>	<p>claimed over 100 hours for their work in the RAMP proceeding. However, SBUA’s work product consisted of four documents that consisted of 21 pages of substantive work product. We find that SBUA’s claimed time working in the RAMP proceeding was excessive in comparison to the limited substantive work product produced. <i>See</i> Part III.D.</p>
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1. 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?	Yes.	Noted
c. If so, provide name of other parties: TURN, Cal Advocates, Mussey Grade Road Alliance (MGRA)		Noted
d. Intervenor’s claim of non-duplication: In the 2025 GRC, MGRA, TURN and Cal Advocates also opposed SCE’s proposal for targeted undergrounding but took different approaches. Similarly, Cal Advocates, SBUA and TURN all took issue with SCE’s transportation electrification capital proposal but for different reasons, based on unique analysis, and with different proposed alternatives. SBUA took distinct positions on numerous other issues and provided independent opinions, evidence and arguments. Similarly, in the RAMP proceeding, SBUA sought to reduce overlap of efforts by presenting unique perspectives on the concerns of small business ratepayers as a distinct customer class. SBUA’s comments on the SPD Report offered independent analysis on many issues, and SBUA was the only party that specifically analyzed and presented the perspectives of small commercial customers in the RAMP proceeding.		Noted

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
a. Intervenor’s claim of cost reasonableness: SBUA participated in the GRC by filing a response to the application, attending conferences, submitting opening and rebuttal testimony (exhibits SBUA-01 and SBUA-02R), filing motions, propounding data requests and obtaining stipulated responses in lieu of cross examination of some SCE, Cal Advocates and TURN witnesses (exhibits SBUA-03 through SBUA-09), engaging cross examination at evidentiary hearings, participating in	Noted

party conferrals, exploring settlement, filing opening and reply briefs, participating in oral argument, engaging in an *ex parte* meeting concerning the proposed decision, and submitting opening and reply comments on the proposed decision, which resulted in meaningful revisions to the proposed decision. SBUA's *ex parte* meeting was directly related to the Commission revising the proposed decision as discussed in part II(A)(3) above.

SBUA's involvement significantly improved the record and outcome of the proceedings both quantitatively and qualitatively. On the financial side, SBUA's contributions identified in the Decision include:

(a) evaluating in detail SCE's TUG proposal and presenting testimony and argument supporting the Commission's approval of approximately \$940 million in expenditures, which is more than \$2 billion less than SCE's request, and subjecting any additional expenditures to reasonableness review;

(b) supporting reducing SCE's TEGR capital amount by approximately \$100 million compared to SCE's request, establishing TEGR advice letter reporting requirements and establishing a TEGR memorandum account; and

(c) in the Vegetation Management domain, confirming consideration of foreseeable environmental review cost drivers to reduce the risk of future overruns, reviewing vendor management practices, identifying lack of consideration of the magnitude of ongoing vendor unionization, showing the unreasonableness of SCE ramping up to remote sensing for its entire service territory to support the Commission reducing the routine inspection allocation by approximate \$20 million and opposing SCE's proposal to allow a 115% VMBA reasonableness threshold.

SBUA's participation in this regard helped to save ratepayers millions of dollars.

On a qualitative level, SBUA's contributions identified in the decisions include, among other things: (d) reviewing small business-serving programs, identifying small business customer needs and confirming that a stipulated reduction of \$2 million in Business Customer Services O&M did not significantly diminish existing level of service; (e) evaluating SCE's Wildfire Management forecasts, including its aerial suppression program, identifying timing issues with SCE's remote grid feasibility study and the need to consider alternatives, and opposing an increase of reasonableness review threshold; (f) showcasing the affordability and equity problems posed by the scale of SCE's revenue request and; and (g) evaluating the RAMP application and the Safety Policy Division Report to ensure completeness, especially as to key relevant factors impacting small

<p>business customers. Collectively, these qualitative contributions ensured that the interests of small business customers were considered in the Commission’s General Rate Case determinations, including on safety, reliability, and cost-effectiveness.</p> <p>SBUA’s participation was focused and the compensation request seeks an award of \$299,762 for <u>approximately 538</u> hours of work, excluding compensation related time. This amount is reasonable in light of the significance and complexity of the GRC and RAMP proceedings. SBUA’s contribution was substantial and justified SBUA’s hours on behalf of an underrepresented class of hundreds of thousands of small business ratepayers served by SCE. For these reasons, the Commission should find that SBUA’s efforts have been valuable and approve the request for fees.sd</p>	
<p>b. Reasonableness of hours claimed:</p> <p>SBUA relied on a strategic team of attorneys and experts for its advocacy related to this compensation request. These hourly amounts are reasonable given the demands of this proceeding and time required to participate.</p> <p>SBUA assigned primary responsibility for the GRC proceeding to mid/senior-level attorney, Ariel Strauss who has represented SBUA in many energy-related proceedings and who handled review, analysis, discovery, evidentiary hearings, briefing, an <i>ex parte</i> meeting, and comments on the proposed decision.</p> <p>SBUA assigned primary responsibility for the RAMP proceeding to mid-level attorney, Luke May who handled review, analysis, and commenting on SCE’s RAMP application and the SPD Safety Report. SBUA also secured input from expert Bill Steele on the RAMP application in an advisory capacity, and he attended the pre-RAMP workshop; however, given the limited scope of his involvement and time expended, SBUA is not seeking compensation for his hours.</p> <p>SBUA Litigation Supervisor, Jennifer Weberski, an employee of SBUA, has over 25 years of utility regulatory experience. She engaged particularly in the earlier parts of the proceedings drafting SBUA’s responses and SBUA’s GRC notice of intent, engaging in discovery with SCE, and researching and editing portions of SBUA testimony on affordability.</p> <p>Theodore Love, an outside consultant with Green Energy Economics Group, Inc. (GEEG), provided data analysis, particularly of SCE’s TUG proposal, and sponsored SBUA’s testimony. Mr. Love has approximately 19 years of professional experience and for the past 8 years has served as a partner at GEEG. The Contract Agreement between GEEG and SBUA is included as <u>Attachment 4</u>.</p>	<p>Noted</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. Mr. Birkelund, Mr. Strauss, and Mr. May 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. Mr. Birkelund was an employee of SBUA when these proceedings began (2021, 2022) but transitioned to serving as outside counsel in 2023.</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>SBUA submits that it made significant contributions to the proceeding and all of the recorded hours claimed were justifiably and efficiently expended given the level of effort required to participate in the complexities of this case.</p>	
<p>c. Allocation of hours by issue:</p> <p>Allocation of hours for D.25-09-030 and D.23-11-007:</p> <ol style="list-style-type: none"> 1. Targeted Undergrounding – 113.1 hrs. or 21.0% 2. Transportation Load Growth – 28.6 hrs. or 5.3% 3. Vegetation Management – 54.3 hrs. or 10.1% 4. Wildfire Management – 39.4 hrs. or 7.3% 5. Small Business Services – 47.9 hrs. or 8.9% 6. Affordability & Equity – 28.3 hrs. or 5.3% 7. Risk Assessment Mitigation Phase – 107.7 hrs. or 20% 8. Hearings and Oral Argument – 43.05 hrs. or 8.0% 9. Party Conferences, Workshops, and Settlement Efforts – 36.95 hrs. or 6.9% 10. General Participation – 38.35 hrs. or 7.1% <p>Categories 1-6 all fall within Issues 1 (TY 2025 request reasonableness) and 2 (post-TY reasonableness) of the September 5, 2023, Assigned Commissioner’s Scoping Memo and Ruling. Categories 1, 3, and 4 also implicate Issue 5 (reasonableness of SCE’s safety and risk presentations). Categories 1-3 also encapsulate Issue 3 (establishment, modification or elimination of balancing and memoranda accounts). Finally, Category 1 also addresses Issue 7 (consistency with the Commission’s Environmental</p>	<p>Noted</p>

and Social Justice Action Plan). Category 7 falls within the RAMP proceeding and its Scoping Memo Issue 1 (whether the RAMP submission is complete) and Issue 2 (any gaps in the RAMP report).

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.

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Ariel Strauss	2023	8.7	\$510	D.24-08-056	\$4,437.00	4.45 [7, 8]	\$510.00 [1]	\$2,269.50
Ariel Strauss	2024	147.4	\$530	D.25-03-021	\$78,122.00	78.15 [7, 8]	\$530.00 [1]	\$41,419.50
Ariel Strauss	2025	30.1	\$550	As above, escalated by 3.46% for 2025	\$16,555.00	18.85 [7, 8]	\$550.00 [1]	\$10,367.50
Luke May	2022	74.9	\$440	D.23-11-111	\$32,956.00	35.60 [6, 8]	\$440.00 [2]	\$15,664.00
Luke May	2023	5.1	\$460	D.25-05-023	\$2,346.00	3.90 [6, 8]	\$460.00 [2]	\$1,794.00
Theo Love	2023	13.25	\$340	D.25-06-065	\$4,505.00	7.25 [7, 8]	\$340.00 [3]	\$2,465.00
Theo Love	2024	82.5	\$355	As above, escalated by 4.07% for 2024	\$29,287.50	33.00 [7, 8]	\$355.00 [3]	\$11,715.00
Theo Love	2025	12	\$370	As above, escalated by 3.46% for 2025	\$4,440.00	8.25 [7]	\$365.00 [3]	\$3,011.25
Jennifer Weberski	2022	6	\$675	D.23-11-031	\$4,050.00	4.00 [8]	\$675.00	\$2,700.00

CLAIMED						CPUC AWARD		
Jennifer Weberski	2023	20.25	\$705	D.24-02-031	\$14,276.25	9.75 [7, 8]	\$705.00	\$6,873.75
Jennifer Weberski	2024	39.25	\$735	D.25-06-029	\$28,848.75	10.75 [7, 8]	\$735.00	\$7,901.25
Jennifer Weberski	2025	1.75	\$760	As above, escalated by 3.46% for 2025	\$1,330.00	0.75 [7, 8]	\$760.00 [4]	\$570.00
James Birkelund	2021	4.3	\$650	D.22-08-046	\$2,795.00	2.05 [8]	\$650.00 [5]	\$1,332.50
James Birkelund	2022	31.5	\$705	D.23-02-016	\$22,207.50	17.50 [8]	\$705.00 [5]	\$12,337.50
James Birkelund	2023	22.5	\$770	D.24-08-056	\$17,325.00	14.25 [7, 8]	\$770.00 [5]	\$10,972.50
James Birkelund	2024	30.95	\$800	D.25-03-021	\$24,760.00	15.20 [7, 8]	\$800.00 [5]	\$12,160.00
James Birkelund	2025	7.2	\$830	D.25-07-036	\$5,976.00	3.95 [7, 8]	\$830.00 [5]	\$3,278.50
Subtotal: \$294,217.00						Subtotal: \$146,831.75		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Luke May	2022	2	\$220	50% of 2022 rate	\$440.00	2.00	\$220.00 [2]	\$440.00
James Birkelund	2022	0.5	\$352.5	50% of 2022 rate	\$176.25	0.00 [9]	N/A [5]	\$0.00
Jennifer Weberski	2023	1.5	\$352.5	50% of 2023 rate	\$528.75	1.50	\$352.50	\$528.75
Ariel Strauss	2025	16	\$275	50% of 2025 rate	\$4,400.00	12.00 [9]	\$275.00 [1]	\$3,300.00
Subtotal: \$5,545.00						Subtotal: \$4,268.75		
TOTAL REQUEST: \$299,762.00						TOTAL AWARD: \$151,100.50		

*We remind all intervenors that Commission 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		CPUC AWARD	
<p>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 ¹⁶	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Ariel S. Strauss	March 2012	282230	No
Jennifer L. Weberski	Admitted (Connecticut, 1997; Washington D.C., 2003)	Conn. Bar No. 414546; D.C. Bar No. 481853.	No
James M. Birkelund	March 2000	206328	No
Luke May	Admitted (Oregon 2012)	OR Bar No. 121174	No

C. Attachments Documenting Specific Claim and Comments on Part III:¹⁷

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service (<i>see</i> attachment under separate cover)
Attachment 2	Time Sheet Records with Allocation of Hours by Issue
Attachment 3	Attorney-Client Agreement with E&E Law (redacted to remove attorney-client information; confidential version separately filed by motion under seal)
Attachment 4	Contract Agreement with Green Energy Economics Group

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Strauss’ 2023-2025 Hourly Rates	SBUA has confirmed that Strauss is a consultant. Pursuant to Commission policy, the rate requested by an intervenor must not exceed the rate billed to

¹⁶ This information may be obtained through the State Bar of California’s website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

¹⁷ Attachments are not included in the final decision.

Item	Reason
<p>and 2025 Intervenor Compensation Claim Preparation Rate</p>	<p>that intervenor by any outside consultant it hires, even if the consultant's billed rate is below the floor for a given experience level.¹⁸ Per the IComp Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award.¹⁹</p> <p>SBUA has confirmed that per the terms of their contract, Strauss has been hired on a contingency rate basis, meaning that Strauss has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on Strauss experience as a Legal – Attorney – Level III.</p> <p>Given that the 2023 rate range for Legal – Attorney – Level III is \$342.53 to \$552.25, we find the requested 2023 hourly rate of \$510.00 to be reasonable and we adopt it here.</p> <p>Given that the 2024 rate range for Legal – Attorney – Level III is \$360.71 to \$570.43, we find the requested 2024 hourly rate of \$530.00 to be reasonable and we adopt it here.</p> <p>Given that the 2025 rate range for Legal – Attorney – Level III is \$376.79 to \$586.51, we find the requested 2025 hourly rate of \$550.00 to be reasonable and we adopt it here. We apply one-half of Strauss's 2025 hourly rate for an 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.</p>
<p>[2] May's 2022 and 2023 Hourly Rates and 2022 Intervenor Compensation Claim Preparation Rate</p>	<p>SBUA has confirmed that May is a consultant. Pursuant to Commission policy, the rate requested by an intervenor 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. Per the IComp Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award.</p> <p>SBUA has confirmed that per the terms of their contract, May has been hired on a contingency rate basis, meaning that May has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by</p>

¹⁸ D.07-01-009, D.08-04-010, and Resolution ALJ-235.

¹⁹ § 1804(d).

Item	Reason
	<p>Resolution ALJ-393 based on May’s experience as a Legal – Attorney – Level III.</p> <p>Given that the 2022 rate range for Legal – Attorney – Level III is \$323.46 to \$533.18, we find the requested 2022 hourly rate of \$440.00 to be reasonable and we adopt it here. We apply one-half of May’s 2022 hourly rate for a 2022 intervenor compensation claim preparation rate of \$220.00.</p> <p>Given that the 2023 rate range for Legal – Attorney – Level III is \$342.53 to \$552.25, we find the requested 2023 hourly rate of \$460.00 to be reasonable and we adopt it here.</p> <p>The award determined herein for the May’s contribution in this proceeding shall be paid in full to May, 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.</p>
<p>[3] Love’s 2023-2025 Hourly Rates</p>	<p>SBUA has confirmed that Love is a consultant. Pursuant to Commission policy, the rate requested by an intervenor 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. Per the IComp Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award.</p> <p>SBUA has confirmed that per the terms of their contract, Love has been hired on a contingency rate basis, meaning that Love has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on Love’s experience as an Expert – Energy and Resources Expert.</p> <p>Given that the 2023 rate range for Expert – Energy and Resources Expert – Level IV is \$174.93 to \$349.53, we find the requested 2023 hourly rate of \$340.00 to be reasonable and we adopt it here.</p> <p>Given that the 2024 rate range for Expert – Energy and Resources Expert – Level V is \$198.74 to \$386.86, we find the requested 2024 hourly rate of \$355.00 to be reasonable and we adopt it here.</p> <p>Given that the 2025 rate range for Expert – Energy and Resources Expert – Level V is \$208.12 to \$396.24, we find the requested 2025 hourly rate of \$370.00 to be excessive. Based on Love’s experience, we determine that an hourly rate of \$365.00 is more reasonable, and approve it here.</p> <p>The award determined herein for Love’s contribution in this proceeding shall be paid in full to Love, 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</p>

Item	Reason
	proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission's policy on consultant compensation.
[4] Weberski's 2025 Hourly Rate	D.26-02-056 approved a 2025 hourly rate of \$760.00 for Weberski, which we apply here.
[5] Birkelund's 2021-2025 Hourly Rates	<p>SBUA has confirmed that Birkelund is a consultant. Pursuant to Commission policy, the rate requested by an intervenor 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.²⁰ Per the IComp Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award.²¹</p> <p>SBUA has confirmed that per the terms of their contract, Birkelund has been hired on a contingency rate basis, meaning that Birkelund has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on Birkelund's experience as a Legal – Legal Director.</p> <p>Given that the 2021 rate range for Legal – Legal Director – Level IV is \$469.24 to \$783.36, we find the requested 2021 hourly rate of \$650.00 to be reasonable and we adopt it here.</p> <p>Given that the 2022 rate range for Legal – Legal Director – Level V is \$552.79 to \$907.47, we find the requested 2022 hourly rate of \$705.00 to be reasonable and we adopt it here.</p> <p>Given that the 2023 rate range for Legal – Legal Director – Level V is \$585.37 to \$940.05, we find the requested 2023 hourly rate of \$770.00 to be reasonable and we adopt it here.</p> <p>Given that the 2024 rate range for Legal – Legal Director – Level V is \$616.43 to \$971.11, we find the requested 2024 hourly rate of \$800.00 to be reasonable and we adopt it here.</p> <p>Given that the 2025 rate range for Legal – Legal Director – Level V is \$643.92 to \$998.60, we find the requested 2025 hourly rate of \$830.00 to be reasonable and we adopt it here.</p> <p>The award determined herein for Birkelund's contribution in this proceeding shall be paid in full to Birkelund, and no portion of this part of the award shall</p>

²⁰ D.07-01-009, D.08-04-010, and Resolution ALJ-235.

²¹ § 1804(d).

Item	Reason
	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.
[6] Time Adjustment	SBUA's submitted timesheet show that May worked 0.70 hours on December 30, 2023, on an activity described as "final review and edits to reply comments." We find that this activity should have been in 2022, and not 2023, because SBUA submitted its Reply Comments to SCE's Application in A.22-05-013 on December 30, 2022. We therefore add 0.70 hours to May's 2022 work and reduce 0.70 hours from May's 2023 work.
[7] Lack of Substantial Contribution	<p>Public Utilities Code § 1802(j) states that a substantial contribution "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."</p> <p>In our determination that SBUA made a contribution, we also evaluate whether the hours claimed were commensurate with the contributions made. 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. Because SBUA's efforts were excessive and were not sufficiently contributory, we reduce 140.00 hours from its work on claimed time on the Targeted Undergrounding, Wildfire Management, Small Business Services, and Affordability & Equity issues, as it appropriately acknowledges the value of SBUA's contributions.</p> <p>Although the Commission will compensate intervenors regardless of whether their positions are adopted, SBUA's input had minimal influence on the decision-making process. The award granted herein is commensurate with that level of contribution.</p> <p><u>Targeted Undergrounding (56.70 hours reduced)</u></p> <p>As described in Part II.A, we find that SBUA's efforts on the targeted undergrounding (TUG) issue had minimal influence on the decision-making process. SBUA's recommendation to deny SCE's TUG request was not adopted in whole or in part by D.25-09-030. SBUA also was only cited three times by D.25-09-030 regarding targeted undergrounding. In one of those instances the decision was critical of SBUA for comparing Southern California Edison's cost forecasting with Pacific Gas and Electric Company's.</p> <p>Based on these reasons, we find that SBUA's efforts did not substantially contribute to the outcome as described and/or SBUA did not provide any citation or explanation as to how its efforts substantially contributed to the outcome, which would justify their request for 113.10 hours of work. Given</p>

Item	Reason
	<p>that SBUA’s contribution was limited on the TUG issue, we reduce 56.70, or roughly 50%, of SBUA’s claimed time on this issue.</p> <p><u>Wildfire Management (30.00 hours reduced)</u></p> <p>As described in Part II.A, most of SBUA’s work on the wildfire management issue were either not adopted in full or in part by D.25-09-030 or were duplicative of other parties. The majority of SBUA’s work did not substantially contribute to the outcome as described and/or SBUA did not provide any citation or explanation as to how its efforts substantially contributed to the outcome, which would justify their request for 39.40 hours of work. Given that SBUA’s contribution on the wildfire management issue was limited, we reduce 30.00 hours, or roughly 75%, of SBUA’s claimed time on this issue.</p> <p><u>Small Business Services (25.00 hours reduced)</u></p> <p>As described in Part II.A, the majority of SBUA’s claimed contributions on the small business services issue were not adopted in whole or in part by D.25-09-030. The decision found that most of SBUA’s recommendations were either without merit or were premature to be discussed in A.23-05-010. A few of SBUA’s recommendations were adopted in part by D.25-09-030 so we find it reasonable to award SBUA part of the 47.90 hours requested on the small business services issue. We therefore find it reasonable to reduce 25.00 hours of SBUA’s work on this issue.</p> <p><u>Affordability and Equity (28.30 hours reduced)</u></p> <p>As described in Part II.A, we find that SBUA’s efforts on the affordability and equity issue did not substantially contribute to the proceedings’ outcomes. SBUA’s recommendations on small business affordability metrics were found to be outside the scope of the proceeding and their other comments on affordability and equity were either unhelpful or duplicative other parties’ positions. We therefore find it reasonable to reduce all 28.30 hours SBUA claimed for their work on the affordability and equity issue.</p> <p><u>Total Reductions by Representative:</u></p> <p><i>Strauss</i></p> <ul style="list-style-type: none"> • 2023: 4.00 hours • 2024: 40.50 hours • 2025: 9.25 hours <p><i>Love</i></p> <ul style="list-style-type: none"> • 2023: 5.50 hours • 2024: 37.50 hours • 2025: 3.75 hours

Item	Reason
	<p><i>Weberski</i></p> <ul style="list-style-type: none"> • 2023: 8.25 hours • 2024: 16.50 hours • 2025: 0.75 hours <p><i>Birkelund</i></p> <ul style="list-style-type: none"> • 2023: 5.00 hours • 2024: 6.75 hours • 2025: 2.25 hours
[8] Excessive Hours	<p>We reduce 130.00 hours from SBUA’s claimed work in A.22-05-013 and A.23-05-010 for excessive hours claimed for the following reasons.</p> <p><u>Excessive General Participation Hours (60.00 hours reduced)</u></p> <p>Per the Intervenor Compensation Program Guide at 26, timesheet records should not excessively categorize work under “General” participation. Normally intervenors may use the General Participation category for preliminary preparation and analysis required to gain general knowledge of a proceeding, however, this should not be a significant portion of the representative’s time. Most professional work can be, and must be tied to specific, substantive issues in the proceedings.</p> <p>In this case, the timesheet records show that SBUA dedicated 43.05 hours to “Hearings and Oral Argument,” 36.95 hours to “Party Conferences, Workshops, and Settlement Efforts,” and 38.35 hours to “General Participation.” Because SBUA failed to link its hours on the first two efforts to any specific, substantive issues, beyond mere attendance, these hours are categorized as general participation. We therefore find the 113.85 total general participation hours excessive. Accordingly, we reduce SBUA’s general participation time by 60 hours, (approximately 50%). These hours lack a clear nexus to any specific, substantive issues and failed to demonstrate a meaningful contribution to the Commission’s decision-making process.</p> <p><u>Excessive Hours Preparing Documents (70.00 hours reduced)</u></p> <p>The length of a document does not always indicate its depth, substance, and impact. Excessiveness is when the Commission determines that the time claimed is disproportionate to the reasonable amount of effort required for that contribution. Furthermore, the burden of proof is on the intervenor to show that each of the hours claimed were spent productively making a substantial contribution to the decision. In this instance SBUA failed to prove that. The reductions made here are not based on the length of the document, but due to inefficiencies and the excessive time spent producing it. Accordingly, we reduce 70.00 hours from SBUA’s work on the following seven documents.</p>

Item	Reason
	<p><i>Documents Filed in A.22-05-013 (47.50 hours reduced):</i></p> <ul style="list-style-type: none"> • <u>Response to Southern California Edison’s (SCE) Application Regarding 2022 Risk Assessment Mitigation Phase (RAMP)</u>: SBUA claimed 13.90 hours for three and one-half pages of substantive work product. We reduce SBUA’s claimed time by 7.50 hours. • <u>Opening Comments on SCE’s RAMP Application and Safety Policy Division’s (SPD) Evaluation</u>: SBUA claimed 40.30 hours for seven pages of substantive work product. We reduce SBUA’s claimed time by 27.50 hours. • <u>Reply Comments on SCE’s RAMP Application</u>: SBUA claimed 26.55 hours for eight pages of substantive work product produced. We reduce SBUA’s claimed time by 12.50 hours <p><i>Documents Filed in A.23-05-010 (22.50 hours reduced)</i></p> <ul style="list-style-type: none"> • <u>Direct Testimony of Theodore Love</u>: SBUA claimed 91.60 hours for 28 pages of substantive work product produced. After reducing over 30.00 hours related to the direct testimony in the above failure to substantially contribute to the decision-making process reduction, we find it reasonable to further reduce SBUA’s claimed time by 4.00 hours. • <u>Rebuttal Testimony of Theodore Love</u>: SBUA claimed 51.15 hours for four pages of substantive work product produced.²² After reducing over 25.00 hours related to the rebuttal testimony in the above reduction for failure to substantially contribute to the decision-making process, we find it reasonable to further reduce SBUA’s claimed time by 18.50 hours. <p><u>Total Reductions by Representative:</u></p> <p><i>Strauss</i></p> <ul style="list-style-type: none"> • 2023: 0.25 hours • 2024: 28.75 hours • 2025: 2.00 hours <p><i>May</i></p> <ul style="list-style-type: none"> • 2022: 40.00 hours • 2023: 0.50 hours <p><i>Love</i></p> <ul style="list-style-type: none"> • 2023: 0.50 hours

²² SBUA’s original version of Love’s Rebuttal Testimony (SBUA-02) was 16 pages. However, SBUA revised the document to only four pages of substantive work product after SCE’s motion to strike the Rebuttal Testimony was granted in part. See ALJ’s Ruling Addressing SCE’s Motion to Strike, May 7, 2024, and Rebuttal Testimony of Theodore Love on Behalf of SBUA Revised Pursuant to ALJ’s Ruling on May 7, 2024 (SBUA-02R), May 17, 2024.

Item	Reason
	<ul style="list-style-type: none"> • 2024: 12.00 hours <p><i>Weberski</i></p> <ul style="list-style-type: none"> • 2022: 2.00 hours • 2023: 2.25 hours • 2024: 12.00 hours • 2025: 0.25 hours <p><i>Birkelund:</i></p> <ul style="list-style-type: none"> • 2021: 2.25 hours • 2022: 14.00 hours • 2023: 3.25 hours • 2024: 9.00 hours • 2025: 1.00 hours
<p>[9] Excessive Intervenor Compensation Claim Preparation Hours</p>	<p>SBUA claimed 20.00 hours for preparation this intervenor compensation request and its Notices of Intent (NOI) in A.22-05-013 and A.23-05-010. While the NOIs and this claim were detailed, organized, and generally compliant with Commission requirements, we find the preparation hours excessive given the scope of issues and overall scale of the request. We particularly take issue with the 0.50 hours that Birkelund requested for revising the NOI in A.22-05-013 and the excessive hours Strauss took preparing this claim.</p> <p>Regarding the NOI, SBUA also requested 2.00 hours for May to draft that NOI. We find that Birkelund’s involvement in revising the NOI was unnecessarily duplicative given May’s many years of experience as an attorney. Since we do not grant Birkelund any intervenor compensation claim preparation hours, we will not award Birkelund an intervenor compensation claim preparation hourly rate.</p> <p>Regarding this claim, we take note of Strauss’ significant experience practicing before the Commission and preparing similar claims, and we expect greater efficiency in compiling this request. Additionally, SBUA did not provide a rationale explaining why this particular claim required this level of effort. Accordingly, we reduce Strauss’ 2025 intervenor claim preparation hours by 4.50 hours.</p> <p>Overall, we find awarding 15.50 hours for preparation of the NOIs and this claim better reflects the complexity and scale of the request.</p>
<p>[10] Intervenor Responsibility for Transparency</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,</p>

Item	Reason
and Accuracy in Compensation Requests	<p>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. Intervenor 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. Small Business Utility Advocates has made a substantial contribution to D.25-09-030 and D.23-11-007.
2. The requested hourly rates for Small Business Utility Advocates’ representatives, as adjusted herein, are comparable to market rates paid to experts/advocates having comparable training and experience and offering similar service, and/or reflect the actual rates billed to, and paid by the intervenor, for consultant services rendered.

3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$151,100.50.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. Small Business Utility Advocates is awarded \$151,100.50.
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 February 7, 2026, 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 22-05-013 is closed.
5. Application 23-05-010 is closed.

This decision is effective today.

Dated July __, 2026, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D2509030, D2311007		
Proceeding(s):	A2305010, A2205013		
Author:	ALJ Colin Rizzo, ACALJ Ehren Seybert, ALJ Rafael L. Lirag		
Payer(s):	Southern California Edison Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Small Business Utility Advocates	Nov. 24, 2025	\$299,762.00	\$151,100.50	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	\$510	2023	\$510.00
Ariel	Strauss	Attorney	\$530	2024	\$530.00
Ariel	Strauss	Attorney	\$550	2025	\$550.00
Theo	Love	Expert	\$340	2023	\$340.00
Theo	Love	Expert	\$355	2024	\$355.00
Theo	Love	Expert	\$370	2025	\$365.00
Luke	May	Attorney	\$440	2022	\$440.00
Luke	May	Attorney	\$460	2023	\$460.00
Jennifer	Weberski	Attorney	\$675	2022	\$675.00
Jennifer	Weberski	Attorney	\$705	2023	\$705.00
Jennifer	Weberski	Attorney	\$735	2024	\$735.00
Jennifer	Weberski	Attorney	\$760	2025	\$760.00

James	Birkelund	General Counsel	\$650	2021	\$650.00
James	Birkelund	General Counsel	\$705	2022	\$705.00
James	Birkelund	General Counsel	\$770	2023	\$770.00
James	Birkelund	General Counsel	\$800	2024	\$800.00
James	Birkelund	General Counsel	\$830	2025	\$830.00

(END OF APPENDIX)