



FORM A: BLANK NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION

FILED

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

06/18/26 04:59 PM

Application of Pacific Gas and Electric Company to Recover in Customer Rates the Costs to Support Extended Operation of Diablo Canyon Power Plant from January 1 through December 31, 2027, and for Approval of Planned Expenditure of 2027 Volumetric Performance Fees (U-39E)	Application 26-03-031 (Filed: March 27, 2026) A2603031
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WOMEN’S ENERGY MATTERS’ NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION AND, IF REQUESTED (and ¹ checked), ADMINISTRATIVE LAW JUDGE’S RULING ON WOMEN’S ENERGY MATTERS’ SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP

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

Customer or Eligible Local Government Entity (party intending to claim intervenor compensation): WOMEN’S ENERGY MATTERS	
Assigned Commissioner: KAREN DOUGLAS	Administrative Law Judge: JACK CHANG
I hereby certify that the information I have set forth in Parts I, II, III and IV of this Notice of Intent is true to my best knowledge, information and belief.	
Signature:	<i>Jean Merrigan</i>
Date: June 18, 2026	Printed Name: Jean Merrigan, Executive Director Women’s Energy Matters

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

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

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

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

<p><u>Explanation:</u> Women’s Energy Matters (WEM) is a Category 3 non-profit organization working for a rapid transition to a clean, efficient, renewable energy system that is responsive to local communities and sensitive to environmental and economic justice. As stated in its Articles of Incorporation, WEM's purpose includes “to represent the interests of consumers in administrative and judicial proceedings concerning public utilities matters.” WEM has been representing California ratepayers before the CPUC since 2001. WEM represents the perspectives of customers (particularly women and low-income customers) who tend to be underrepresented in CPUC proceedings. WEM estimates that more than 90% of its constituents are residential customers. WEM's Articles of Incorporation and Bylaws were previously submitted in I.1210013 with a filing date of 2-6-13 (published 5-9-13).</p>	
<p>Do you have any direct economic interest in outcomes of the proceeding?³</p> <p>If “Yes”, explain:</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>B. Conflict of Interest (§ 1802.3)</p>	<p>Check</p>
<p>1. Is the customer a representative of a group representing the interests of small commercial customers who receive bundled electric service from an electrical corporation?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>2. If the answer to the above question is “Yes”, does the customer have a conflict arising from prior representation before the Commission?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>C. Status as an Eligible Local Government Entity (§§1802(d), 1802.4, 1803.1)</p>	
<p>The party claims “eligible local government entity” status because the party is a city, county, or city and county that is not a publicly owned public utility that intervenes or participates in a Commission proceeding for the purpose of protecting the health and safety of the residents within the entity’s jurisdiction following a catastrophic material loss suffered by its residents either in significant damage to infrastructure or loss of life and property, or both, as a direct result of public utility infrastructure.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>The party’s explanation of its status as an eligible local government entity must include a description of</p> <p>(1) The relevant triggering catastrophic event;</p> <p>(2) The impacts of the triggering catastrophic event on the residents within the entity’s jurisdiction as a result of public utility infrastructure; and</p> <p>(3) The entity’s reason(s) to participate in this proceeding.</p>	
<p>D. Timely Filing of Notice of Intent to Claim Intervenor Compensation (NOI) (§ 1804(a)(1)):</p>	
<p>1. Is the party’s NOI filed within 30 days after a Prehearing Conference?</p>	<p><input checked="" type="checkbox"/> Yes</p>

³ See Rule 17.1(f).

Date of Prehearing Conference: 5/22/2026	<input type="checkbox"/> No
2. Is the party's NOI filed at another time (for example, because no Prehearing Conference was held, the proceeding will take less than 30 days, the schedule did not reasonably allow parties to identify issues within the timeframe normally permitted, or new issues have emerged)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2a. The party's description of the reasons for filing its NOI at this other time:	
2b. The party's information on the proceeding number, date, and decision number for any Commission decision, Commissioner ruling, Administrative Law Judge's ruling, or other document authorizing the filing of NOI at that other time:	

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

A. Planned Participation (§ 1804(a)(2)(A)):
<p>The party's statement of the issues on which it plans to participate: WEM plans to address the following issues:</p> <ul style="list-style-type: none"> • Whether PG&E's forecast cost of operations and requested revenue requirement over the Record Period for DCPD as presented in testimony and the Fall Update is reasonable; • Whether it is reasonable for PG&E to reclassify \$26 million in costs originally included in the Diablo Canyon Transition and Relicensing Memorandum Account to the Diablo Canyon Extended Operations Balancing Account, as described in PG&E's testimony; • Whether PG&E's application and testimony are in compliance with the Commission's prior decisions related to Diablo Canyon extended operations including D.23-12-036, D.24-12-033, D.25-06-002, and D.25-12-007. • Whether PG&E's Volumetric Performance Fees spending plan complies with the law and the Commission's prior orders; • The prudence of continued extended operations at Diablo Canyon. <p>The above issues are WEM's priorities but WEM reserves the right to address all issues in scope as the proceeding evolves.</p> <p>The party's explanation of how it plans to avoid duplication of effort with other parties: WEM will coordinate with other active parties who hold similar positions on issues in order to avoid duplication and increase the effectiveness of our advocacy. WEM's participation will be unique; WEM will complement and supplement others' efforts when appropriate but will not duplicate those efforts.</p> <p>The party's description of the nature and extent of the party's planned participation in this proceeding (to the extent that it is possible to describe on the date this NOI is filed). WEM intends to actively participate in this proceeding, including thoroughly reviewing and</p>

analyzing PG&E’s application and testimony; conducting discovery as appropriate; reviewing PG&E’s discovery responses to other parties; filing testimony, briefs and comments as appropriate; reviewing and analyzing the testimony and briefs filed by other parties; and participating in hearings and workshops. WEM will produce unique work product that addresses the issues identified above. As noted, WEM will closely follow other parties’ work product to expand its understanding of issues but WEM will not duplicate the original work of other parties.

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

Item	Hours	Rate \$	Total \$	#
ATTORNEY, EXPERT, AND ADVOCATE FEES				
Jean Merrigan	150	\$275		\$41,250
Expert 2 (if needed)	25	\$275		\$ 6,875
				\$48,125
Subtotal: \$				
[Person 1]				
[Person 2]				
Subtotal: \$				
COSTS				
None anticipated at this time				
Subtotal: \$				
TOTAL ESTIMATE: \$ 48,125				

Estimated Budget by Issues:
WEM provides the following estimate, noting this is only an estimate and may be revised as this proceeding evolves: reasonableness of PG&E’s 2027 forecast costs and requested revenue requirement: (50%); compliance with prior Commission decisions: (20%); VFP spending plan issues (15%); prudence of continued extended operations (15%).

When entering items, type over bracketed text; add additional rows to table as necessary. Estimate may (but does not need to) include estimated Claim preparation time. Claim preparation time is typically compensated at ½ professional hourly rate.

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

A. The party claims that participation or intervention in this proceeding without an award of fees or costs imposes a significant financial hardship, on the following basis:	Applies (check)
1. The customer cannot afford, without undue hardship, to pay the costs of effective participation, including advocate’s fees, expert witness fees, and other reasonable costs of participation. (§ 1802(h))	<input type="checkbox"/>

<p>2. In the case of a group or organization, the economic interest of the Individual members of the group or organization is small in comparison to the costs of effective participation in the proceeding. (§ 1802(h))</p>	<input checked="" type="checkbox"/>
<p>3. The eligible local government entities’ participation or intervention without an award of fees or costs imposes a significant financial hardship. (§ 1803.1(b).)</p>	<input type="checkbox"/>
<p>4. A § 1802(h) or § 1803.1(b) finding of significant financial hardship in another proceeding, made within one year prior to the commencement of this proceeding, created a rebuttable presumption in this proceeding (§ 1804(b)(1)).</p> <p>On June 27, 2025, Administrative Law Judge Nilgun Atamturk issued a Ruling finding that Women’s Energy Matters’ “has shown significant financial hardship” in proceeding A2403018. The date of ALJ Atamturk’s finding of significant financial hardship was less than one year from the filing of today’s NOI and represents a rebuttable presumption. In the event the Commission requires further information, WEM provides an explanation of its claim of significant financial hardship in section B below, and requests an ALJ Ruling on WEM’s showing of financial hardship in this proceeding.</p> <p>Commission’s finding of significant financial hardship made in proceeding number: A2403018</p> <p>Date of Administrative Law Judge’s Ruling ((or CPUC Decision) in which the finding of significant financial hardship was made: June 27, 2025</p>	<input type="checkbox"/>

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

WEM requests an Administration Law Judge ruling on its showing of significant financial hardship filed with this Notice of Intent to Claim Intervenor Compensation, and provides a factual explanation for its claim below:

WEM is a tax-exempt non-profit corporation, organized under the laws of the State of California. WEM represents the perspectives of customers, particularly women and low-income customers, who tend to be underrepresented in CPUC proceedings. WEM’s Articles of Incorporation specifically state that its purpose includes representing “the interests of consumers in administrative and judicial proceedings concerning public utilities matters.”

WEM has a long organizational history of reviewing and challenging utility costs related to California’s nuclear power plants. WEM will review PG&E’s cost projections for Diablo Canyon 2027 extended operations and proposals for VFP spending, and provide the Commission with evidence-based analysis and recommendations on scoped issues.

Women's Energy Matters cannot afford, without undue hardship, to pay the costs of effective participation in this proceeding, and the economic interest of the individual constituents of Women's Energy Matters are small in comparison to the costs of effective participation in the proceeding. WEM has not sought, nor has it received, grants or contributions from companies, agencies, or organizations either participating in the energy services markets or providing any services to such participants in the energy services markets or affiliated with such participants.

In recent years, intervenor compensation awards, granted in recognition of substantial contributions to Commission decisions, have made up a significant portion of WEM's budget, allowing WEM to pay advocates' and expert witness fees, and for other reasonable costs of participation in administrative proceedings. Absent eligibility for such awards, WEM's resources would be inadequate compared to the cost of effective participation in administrative and judicial proceedings and WEM's ability to advocate on behalf of consumers for sustainable energy policies and reasonable rates would be substantially impaired. WEM would suffer significant financial hardship if denied eligibility for compensation. Women's Energy Matters provided the Commission with copies of its Articles of Incorporation and Bylaws in the context of WEM's work in proceeding I.1210013, with a filing date of February 6, 2013, and a published date of May 9, 2013. The California Public Utilities Commission has consistently found that WEM qualifies as a customer suffering significant financial hardship. Representative decisions reflecting this finding are D2411023, D2401048, D2202019, D2005047 and D1807021. WEM requests the opportunity to supplement this NOI if the Commission has any further questions regarding WEM's significant financial hardship.

**PART IV: ATTACHMENTS DOCUMENTING SPECIFIC
ASSERTIONS MADE IN THIS NOTICE**

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

Attachment No.	Description
1	Certificate of Service

**ADMINISTRATIVE LAW JUDGE RULING⁴
(Administrative Law Judge completes)**

	Check all that apply
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⁴ A Ruling needs not be issued unless: (a) the NOI is deficient; (b) the Administrative Law Judge desires to address specific issues raised by the NOI (to point out similar positions, areas of potential duplication in showings, unrealistic expectations for compensation, or other matters that may affect the customer or eligible local government

1. The Notice of Intent (NOI) is rejected for the following reasons:	<input type="checkbox"/>
a. The NOI has not demonstrated the party’s status as a “customer” or an “eligible local government entity” for the following reason(s):	<input type="checkbox"/>
b. The NOI has not demonstrated that the NOI was timely filed (Part I(B)) for the following reason(s):	<input type="checkbox"/>
c. The NOI has not adequately described the scope of anticipated participation (Part II, above) for the following reason(s):	<input type="checkbox"/>
2. The NOI has demonstrated significant financial hardship for the reasons set forth in Part III of the NOI (above).	<input type="checkbox"/>
3. The NOI has not demonstrated significant financial hardship for the following reason(s):	<input type="checkbox"/>
4. The Administrative Law Judge provides the following additional guidance (see § 1804(b)(2)):	<input type="checkbox"/>

IT IS RULED that:

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

Dated _____, at San Francisco, California.

Administrative Law Judge

entity’s Intervenor Compensation Claim); or (c) the NOI has included a claim of “significant financial hardship” that requires a finding under § 1802(h).