



Decision \_\_\_\_\_

**FILED**

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

06/26/26

02:11 PM

In The Matter of the Application of Southern California Gas Company (U904G) for Authorization to Implement Revenue Requirement for Costs to Enable Commencement of Phase 2 Activities for Angeles Link.	Application 24-12-011 (Filed December 20, 2024) A2412011
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**INTERVENOR COMPENSATION CLAIM OF CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE**

**NOTE:** After electronically filing a PDF copy of this Intervenor Compensation Claim (Request), please email the document in an MS WORD and supporting EXCEL spreadsheet to the Intervenor Compensation Program Coordinator at [Icompcoordinator@cpuc.ca.gov](mailto:Icompcoordinator@cpuc.ca.gov).

<b>Intervenor:</b> California Environmental Justice Alliance	<b>For contribution to Decision (D.)</b> 26-04-034
<b>Claimed:</b> \$28,262	<b>Awarded:</b> \$
<b>Assigned Commissioner:</b> President John Reynolds	<b>Assigned ALJ(s):</b> ALJ Joanna Perez-Green
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
<b>Signature:</b>	/s/ Shana Lazerow
<b>Date:</b> June 26, 2026	<b>Submitted by:</b> Shana Lazerow

**PART I: PROCEDURAL ISSUES**  
*(to be completed by Intervenor except where indicated)*

<b>A. Brief description of Decision:</b>	D.26-04-034 adopted an order of review of SoCalGas’ two open Angeles Link Project (“Project”) applications, denied SoCalGas’ application for cost recovery for \$266 million for Phase 2 of the Project, and closed the proceeding.
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812<sup>1</sup>:**

	<b>Intervenor</b>	<b>CPUC Verification</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	March 14, 2025	
2. Other specified date for NOI:	n/a	
3. Date NOI filed:	April 9, 2025	
4. Was the NOI timely filed?		
<b>Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):</b>		
5. Based on ALJ ruling issued in proceeding number:	A.22-05-015, et. al. (See D.25-04-015 (relying on the ALJ decision in A.22-05-015 to find CEJA meets the requirements of eligible customer status).	
6. Date of ALJ ruling:	Feb. 23, 2023	
7. Has the Intervenor demonstrated customer status or eligible government entity status?		
<b>Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):</b>		
8. Based on ALJ ruling issued in proceeding number:	A.22-05-015, et. al. See D.25-04-015 (relying on the ALJ decision in A.22-05-015 to find CEJA meets the requirements for financial hardship).	
9. Date of ALJ ruling:	Feb. 23, 2023	
10. Has the Intervenor demonstrated significant financial hardship?		

<sup>1</sup> All statutory references are to California Public Utilities Code unless indicated otherwise.

	Intervenor	CPUC Verification
<b>Timely request for compensation (§ 1804(c)):</b>		
11. Identify Final Decision:	D.26-04-034	
12. Date of issuance of Final Order or Decision:	May 7, 2026	
13. File date of compensation request:	June 26, 2026	
14. Was the request for compensation timely?		

**C. Additional Comments on Part I: (use line reference # as appropriate)**

#	Intervenor’s Comment(s)	CPUC Discussion
1	The California Environmental Justice Alliance (“CEJA”) is an alliance of nonprofit, public interest, and grassroots environmental justice organizations working to achieve environmental justice for low-income communities and communities of color throughout the state of California. CEJA’s member organizations represent utility customers throughout California that are concerned about their health and the environment. In particular, CEJA is advocating for policies at the federal, state, regional, and local levels that protect public health and the environment. CEJA is also working to ensure that California enacts statewide climate change policies that protect low-income communities and communities of color.	

**PART II: SUBSTANTIAL CONTRIBUTION**  
*(to be completed by Intervenor except where indicated)*

**A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059): (For each contribution, support with specific reference to the record.)**

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p><u>1. Order of Review of Applications</u></p> <p>CEJA urged the Commission to complete Phase 2A before deciding SoCalGas’s Phase 1 cost recovery application. In D.26-04-034, the Commission agreed with CEJA that it is reasonable to address Phase 2A before the Phase 1 cost recovery application.</p>	<p>D.26-04-034, p. 7 (discussing CEJA’s position).</p> <p>D.26-04-034, p. 7 (“We find that it is reasonable to review the Phase 2A threshold issues in the Phase 2 Application before the Commission resolves the Phase 1 Compliance Application.”)</p> <p>Relevant advocacy</p> <ul style="list-style-type: none"> <li>• CEJA/Sierra Club 9/3/25 opening Phase 2A brief (pp. 2-9);</li> <li>• CEJA/Sierra Club 10/17/25 reply Phase 2A brief (pp. 2-6).</li> </ul>	
<p><u>2. Reasonableness of SoCalGas’ Cost Recovery Proposal</u></p> <p>CEJA identified SoCalGas’ proposal to charge all its methane ratepayers for the costs of Angeles Link Phase 2 – rather than customers who would specifically benefit from the project – as a fatal flaw in the application that warranted immediate dismissal. CEJA supported this argument extensively in its protest of the application and successfully persuaded the assigned ALJ to include this issue in the first track of the proceeding, which addressed threshold matters that did not require the</p>	<p>D.26-04-034 recognizes several of CEJA’s positions related to SoCalGas’ cost recovery proposal:</p> <ul style="list-style-type: none"> <li>• “Air Products, Cal Advocates, CEJA/Sierra Club, EDF, First Public H2, Indicated Shippers, TURN, and UCAN oppose cost recovery from ratepayers for this application.” D.26-04-034 at 8 (emphasis added).</li> <li>• “In briefs, Air Products, Cal Advocates, CEJA/Sierra Club, First Public H2, TURN, and UCAN reject that the Project will directly benefit SoCalGas natural gas ratepayers.” (<i>Id.</i> at 9 (emphasis added).)</li> <li>• “CEJA/Sierra Club concur that SoCalGas does not identify ratepayers that would justify cost</li> </ul>	

<p>development of an evidentiary record. CEJA demonstrated that SoCalGas’ application is inconsistent with both the Commission’s duty to approve just and reasonable rates and D.22-12-055 because it would force methane ratepayers to bear the cost of a hydrogen pipeline project that does not benefit them. (<i>E.g.</i>, CEJA/Sierra Club opening brief (9/3/25) at pp. 12-19.) CEJA also rebutted SoCalGas’ arguments for broad cost recovery from methane customers (<i>E.g.</i>, <i>id.</i> at 19-24.) The Commission agreed with CEJA and denied the application based on the briefs in Track 2A.</p>	<p>recovery.” (<i>Id.</i> (emphasis added).)</p> <ul style="list-style-type: none"><li>• “Air Products, Cal Advocates, CEJA/Sierra Club, TURN, and UCAN disagree that the potential indirect benefits are sufficient for cost recovery. Furthermore, Air Products, Cal Advocates, CEJA/Sierra Club, EDF, First Public H2, Indicated Shippers, TURN, and UCAN note that D.22-12-055 requires SoCalGas to identify ratepayers who would receive direct benefits from whom the project’s costs could be recovered. (<i>Id.</i> at 10 (emphasis added) (footnote omitted).)</li><li>• Many parties note that if a hydrogen pipeline were paid for by natural gas ratepayers, it would not provide direct benefits and would lead to cross subsidization. (<i>Id.</i> (citing Sierra Club’s brief, among others).)</li><li>• Air Products, Cal Advocates, CEJA/Sierra Club, EDF, First Public H2, Indicated Shippers, TURN, and UCAN argue that cost recovery from ratepayers is unreasonable based on principles of cost causation and direction provided in D.22-12-055. (<i>Id.</i> (emphasis added).)</li><li>• “Cal Advocates, CEJA/Sierra Club, EDF, TURN, and UCAN express concern over the Project’s impacts on affordable rates.” (<i>Id.</i> at 12 (emphasis added).)</li><li>• “Cal Advocates and CEJA/Sierra Club are concerned that the Project, which is in the planning stage, may not be constructed nor dedicated to public use.” (<i>Id.</i> (emphasis added).)</li></ul>	
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	<p>The Commission’s agreement with CEJA on the unreasonableness of SoCalGas’ cost recovery request undergirded its decision to deny the application.</p> <ul style="list-style-type: none"><li>- “First, we agree with Cal Advocates, CEJA/Sierra Club, and TURN that the Project remains in the planning stage, and may not be constructed, used and useful, nor dedicated to public use.” (D.26-04-034 at 13 (emphasis added).)</li><li>- “With large increases in the projected costs of the studies alone, we share the concerns of Cal Advocates, CEJA/Sierra Club, EDF, TURN, and UCAN about the Project’s costs and impact on affordable rates.” (<i>Id.</i> (emphasis added).)</li><li>- “Second, we also agree with parties including Cal Advocates, CEJA/Sierra Club, and TURN that SoCalGas has not clearly identified ratepayers that would directly benefit from the Project to justify approval of cost recovery in the Phase 2 Application.” (<i>Id.</i> at 14 (emphasis added).)</li><li>- “We agree with Air Products, Cal Advocates, CEJA/Sierra Club, EDF, First Public H2, Indicated Shippers, TURN, and UCAN that D.22-12-055 directed SoCalGas to identify ratepayers that would receive direct benefits from the project and established cost causation principles in application for cost recovery.” (<i>Id.</i> at 14-15 (emphasis added).)</li></ul> <p>Relevant advocacy</p>	
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	<ul style="list-style-type: none"> <li>• Sierra Club/CEJA protest (1/23/25) at pp. 1-9;</li> <li>• Joint Prehearing Conference Statement (3/6/25) at p. 3;</li> <li>• CEJA/Sierra Club opening brief (9/3/25) at pp. 12-24;</li> <li>• CEJA/Sierra Club reply brief (10/17/25) at pp. 12-20;</li> <li>• CEJA/Sierra Club comments on PD (4/9/26) at pp. 2-5;</li> <li>• CEJA/Sierra Club reply comments on PD (4/14/26) at pp. 2-4;</li> <li>• Ex parte meetings with the office of all five Commissioners (see notices of ex parte communications filed 4/28/26).</li> </ul>	
<p><u>3. Jurisdiction</u></p> <p>The Commission invited parties to address two potential routes for exercising jurisdiction over SoCalGas’ application: whether the Commission can regulate the project as a “pipeline” under Pub. Util. Code Sections 227 and 228, or as a “gas plant under Sections 221 and 222. CEJA explained that the Commission does not have jurisdiction over Angeles Link’s Phase 2 activities because Angeles Link is still a hypothetical future utility at this stage; it is premature to decide whether Angeles Link is a “pipeline”; and that the Commission would have jurisdiction over system as a “gas plant” if it is built. In D.26-04-034, the Commission considered all CEJA’s arguments and agreed that</p>	<p>The Commission agreed with CEJA that it is premature to determine jurisdiction under Pub. Util. Code Sections 227 and 228.</p> <ul style="list-style-type: none"> <li>• D.26-04-034, p. 17 (discussing CEJA’s position that it is premature to determine whether the Commission has jurisdiction over Angeles Link as a pipeline under Pub. Util. Code Sections 227 and 228).</li> <li>• <i>Id.</i> at 18 (discussing CEJA’s position that the Commission lacks jurisdiction over a pipeline utility in the planning stages).</li> <li>• <i>Id.</i> (“We agree that we need not reach the question of whether the Project is subject to the Commissions [sic] pipeline jurisdiction.”).</li> <li>• <i>Id.</i> at 19 (“We agree with Cal Advocates, CEJA/Sierra Club, and TURN that the Project is in the planning stages and may not become operational, used and useful, and dedicated to public use.”) (emphasis added).</li> </ul>	

findings regarding Sections 227 and 228 are premature.	<p>CEJA’s arguments regarding the application of Sections 221 and 222 were helpful to Commission conclusion that at the planning stages, the Project would not be deemed to be a gas plant. On pages 19-20, the Commission summarizes CEJA’s arguments that a project must be beyond the planning stages to be treated as a gas plant, but that Angeles Link could be a gas plant if built. This type of Commission acknowledgement constitutes substantial contribution. <i>See e.g.</i> D.24-10-026 (finding substantial contribution even where recommendations are not adopted as final basis for decision.)</p> <p>Relevant advocacy</p> <ul style="list-style-type: none"> <li>• CEJA/Sierra Club opening brief (9/3/25) at pp. 9-12, 25-28;</li> <li>• CEJA/Sierra Club reply brief (10/17/25) at pp. 6-12, 21;</li> <li>• CEJA/Sierra Club comments on PD (4/9/26) at pp. 5-7;</li> <li>• Ex parte meetings with the office of all five Commissioners (see notices of ex parte communications filed 4/28/26).</li> </ul>	
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**B. Duplication of Effort (§ 1801.3(f) and § 1802.5):**

	Intervenor’s Assertion	CPUC Discussion
<b>a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?</b>	Yes	
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	Yes	
<b>c. If so, provide name of other parties:</b>	Given the similarity of positions, CEJA worked with Sierra Club on all filings and activities in this proceeding.	

<p>A number of parties opposed SoCalGas’ application on a variety of grounds including some grounds similar to those stated by CEJA. These parties were The Utility Reform Network (“TURN”), Utility Consumers’ Action Network (“UCAN”), Public Advocates’ Office (“PAO”), Environmental Defense Fund (“EDF”), Indicated Shippers (“IS”), and Air Products.</p>	
<p><b>d. Intervenor’s claim of non-duplication:</b></p> <p>CEJA filed a joint protest, briefs, and comments with Sierra Club to avoid duplication of efforts. CEJA also met with other intervenors to coordinate on issues where they were aligned. CEJA’s work on cost recovery issues was not duplicative because CEJA’s protest and other filings reflect more in-depth legal research on topics than the other parties contributed.</p> <p>While there was broad alignment among intervenors on issues related to cost recovery, CEJA and Sierra Club’s positions regarding jurisdiction were unique. Of the many intervenors who opposed the Commission’s exercise of jurisdiction over a project in the early planning stages, CEJA and Sierra Club were in a distinct minority of parties arguing that the Commission would have jurisdiction over Angeles Link as a gas plant if it were operational. Thus, CEJA and Sierra Club’s joint filings on jurisdiction were not duplicative of the work of other parties.</p>	

**C. Additional Comments on Part II: (use line reference # or letter as appropriate)**

#	Intervenor’s Comment	CPUC Discussion

**PART III: REASONABLENESS OF REQUESTED COMPENSATION**  
**(to be completed by Intervenor except where indicated)**

**A. General Claim of Reasonableness (§ 1801 and § 1806) to be completed by Intervenor:**

	CPUC Discussion
<p><b>a. Intervenor’s claim of cost reasonableness:</b></p> <p>CEJA’s advocacy in this proceeding was reasonably calculated to enable on-bill savings for ratepayers. The costs of CEJA’s participation in this proceeding is dwarfed by the \$266 million that SoCalGas requested to recover from ratepayers for the Phase 2 of the Angeles Link pipeline. Even if SoCalGas does construct Angeles Link in the future and eventually</p>	

	CPUC Discussion
<p>recovers Phase 2 costs, the Commission’s agreement with CEJA that the cost-causation principle applies to the costs of this project will protect residential and small business ratepayers from bearing these costs. (D.26-04-034 at 14-15.)</p>	
<p><b>b. Reasonableness of hours claimed:</b>            CEJA worked efficiently in its contributions to the Commission’s decision to deny SoCalGas’ request for \$266 million in cost recovery. CEJA contributed to the efficient management of the proceeding by recommending that the Commission reject SoCalGas’ application based on its unreasonable cost recovery request without expending stakeholder and Commission resources on an evidentiary process. (3/6/25 Joint Prehearing Conference Statement at 3; 1/23/25 Protest of Sierra Club and CEJA at 1-2.) The ALJ’s agreement with CEJA to include this issue in an early track of the proceeding on purely legal issues drastically reduced the number of hours that CEJA and other parties needed to devote to this proceeding.</p> <p>CEJA also reasonably managed its attorneys’ time by filing joint briefs and comments with Sierra Club. Through this strategy, CEJA was able to reduce the number of hours spent on issues where Sierra Club had special insight – particularly on issue 3, and to a lesser degree issue 2.</p> <p>In addition, CEJA’s attorneys were uniquely able to efficiently develop arguments and review the record because they had contributed to the Commission’s decision in D.22-12-055. Consequently, they were familiar with the Angeles Link project and the unreasonableness of broadly recovering Phase 2 costs from methane ratepayers. CEJA’s lead attorney, Theo Caretto, was also the lead attorney for Communities for a Better Environment in its complaint (C.24-11-013) regarding SoCalGas’s implementation of D.22-12-055, a further efficiency.</p>	
<p><b>c. Allocation of hours by issue:</b></p> <p>CEJA has allocated all its attorney time by issue area or activity, as evidenced by the attached time sheets. The following issues allocate hours by specific substantive issues and activity area addressed by CEJA. CEJA also provides an approximate breakdown of the number of hours spent on each task and the percentage of total hours devoted by each category.</p> <p>Issue 1 – Order of Review of Applications: 40% of hours.            Issue 2 – SoCalGas’ Cost Recovery Proposal: 21% of hours.            Issue 3 – Jurisdiction: 16% of hours.            Issue 4 - General: 12% of hours.</p> <p>Remaining hours were spent on NOI and intervenor compensation claim.</p>	

**B. Specific Claim:\***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Theo Caretto	2025	62.2	\$325	See Comment 1	\$20,215			
Theo Caretto	2026	8.3	\$335	See Comment 1	\$2,780			
Shana Lazerow	2025	2	\$755	See Comment 2	\$1,510			
Shana Lazerow	2026	.7	\$780	See Comment 2	\$546			
<i>Subtotal: \$25,051</i>						<i>Subtotal: \$</i>		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
<i>Subtotal: \$</i>						<i>Subtotal: \$</i>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Theo Caretto	2025	2	\$163	Half of requested 2025 rate (see Comment 1)	\$325			
Shana Lazerow	2026	7.4	\$390	Half of requested 2026 rate (see Comment 2)	\$2,886			
<i>Subtotal: \$3,211</i>						<i>Subtotal: \$</i>		
COSTS								
#	Item	Detail			Amount	Amount		
1.								
2.								

CLAIMED	CPUC AWARD
<i>Subtotal: \$28,262</i>	<i>Subtotal: \$</i>
<b>TOTAL REQUEST: \$28,262</b>	<b>TOTAL AWARD: \$</b>

\*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. 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.

\*\*Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate

**ATTORNEY INFORMATION**

Attorney	Date Admitted to CA BAR <sup>2</sup>	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Shana Lazerow	June 1998	195491	No
Theodore Caretto	December 2022	347221	No

**C. Attachments Documenting Specific Claim and Comments on Part III<sup>3</sup>:  
(Intervenor completes)**

Attachment or Comment #	Description/Comment
Attachment 1	<b>Certificate of Service</b>
Attachment 2	<p><b>Time records</b> A daily listing of the specific tasks performed by Theo Caretto and Shana Lazerow in connection with the work in this proceeding that contributed to D.26-04-034. Ms. Lazerow and Mr. Caretto maintained detailed contemporaneous time records indicating the number of hours devoted to work on this case. In preparing this attachment, Ms. Lazerow and Mr. Caretto reviewed all the hours they individually devoted to this proceeding and included only those that were reasonable for the underlying tasks that contributed to D.26-04-034.</p>
Attachment 3	<p><b>Memorandum of Understanding</b> CEJA submits its Memorandum of Understanding with its member organization Communities for a Better Environment to demonstrate that attorneys Caretto and Lazerow performed work for CEJA in this proceeding</p>

<sup>2</sup> This information may be obtained through the State Bar of California's website at <https://apps.calbar.ca.gov/attorney/LicenseeSearch/QuickSearch>.

<sup>3</sup> Attachments not attached to final Decision

Attachment or Comment #	Description/Comment
	<p>pursuant to a contingency fee agreement. The Commission “does not discourage” the practice of contingency agreements and “will apply the Market Rate Study per Resolution ALJ-393 to set forth rates for consultants on a contingency basis, if intervenors provide supplements and/or agreements to substantiate the rates.” D.24-10-029 at 24.</p>
<p>Comment 1</p>	<p>Theo Caretto is a Staff Attorney for Communities for a Better Environment (“CBE”), which is a CEJA member organization. Mr. Caretto graduated from the UCLA School of Law in May 2022 and was admitted to the California Bar in December 2022. He has over three years of experience representing community-based and environmental justice organizations before the Public Utilities Commission and other state and local agencies.</p> <p>Mr. Caretto began practicing at the Commission prior to Bar admission. In D.25-04-015, the Commission approved rates of \$305 and \$315 per hour for work performed in 2023 and 2024 respectively for Mr. Caretto. Curriculum vitae and descriptions required by Resolution ALJ-393 substantiating Mr. Caretto’s rate were submitted in R.22-07-005. For work performed in 2025, CEJA requests (and has requested in A.24-12-009 and in R.19-01-011) a rate of \$325, which represents a 3.46% increase from the 2024 rate rounded to the nearest \$5 increment, as published in the CPUC’s Hourly Rate Chart as the escalation rate for 2025. For work performed in 2026, CEJA requests a rate of \$335, which represents a 3.35% increase from the 2025 rate, as published in the CPUC’s Hourly Rate Chart as the escalation rate for 2026.</p> <p>Mr. Caretto is an employee of CBE, which represents CEJA in this proceeding on a contingency basis. Other than moneys recovered through intervenor compensation awards, CEJA does not pay CEJA member organizations such as CBE for the time spent by attorneys and experts who are employed by member organizations. CEJA has included further information about this contingency agreement as Attachment 3 to this filing. Since Mr. Caretto’s time was provided to CEJA solely on contingency, CEJA is requesting market rate for his work.</p>
<p>Comment 2</p>	<p>Shana Lazerow is a Legal Co-Director at Communities for a Better Environment (“CBE”). She graduated from law school at the University of California, Los Angeles in December 1997. She has practiced environmental and administrative law for more than 25 years, and she has held the position of Chief of Litigation and/or Legal Director at CBE since 2005. CEJA provided Shana Lazerow’s CV and the justification for the requested hourly rates for Ms. Lazerow, pursuant to the directions in Res. ALJ-393, in CEJA’s request filed in R.20-05-003 on July 15, 2021.</p>

Attachment or Comment #	Description/Comment
	<p>Ms. Lazerow’s 2025 rate of \$755 was approved in D.25-07-027. CEJA requests a 2026 rate of \$780, which represents a 3.35% adjustment, as published in the CPUC’s Hourly Rate Chart as the escalation rate for 2026.</p> <p>Ms. Lazerow is an employee of CBE, which represents CEJA in this proceeding on a contingency basis. Other than moneys recovered through intervenor compensation awards, CEJA does not pay CEJA member organizations such as CBE for the time spent by attorneys and experts who are employed by member organizations. CEJA has included further information about this contingency agreement as Attachment 3 to this filing. Since Ms. Lazerow’s time was provided to CEJA solely on contingency, CEJA is requesting market rate for her work.</p>

**D. CPUC Comments, Disallowances, and Adjustments *(CPUC completes)***

Item	Reason

**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))**

<b>A. Opposition: Did any party oppose the Claim?</b>	
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If so:

Party	Reason for Opposition	CPUC Discussion

<b>B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?</b>	
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If not:

Party	Comment	CPUC Discussion

**(Green items to be completed by Intervenor)**

**FINDINGS OF FACT**

1. CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE [has/has not] made a substantial contribution to D.26-04-034.
2. The requested hourly rates for CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE's representatives [, as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [, as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$ \_\_\_\_\_.

**CONCLUSION OF LAW**

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Pub. Util. Code §§ 1801-1812.

**ORDER**

1. CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE is awarded \$ \_\_\_\_\_.
2. Within 30 days of the effective date of this decision, \_\_\_\_\_ shall pay CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE the total award. [for multiple utilities: "Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated. If such data are unavailable, the most recent [industry type, for example, electric] revenue data shall be used." ] 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 [date], the 75<sup>th</sup> day after the filing of CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE's request, and continuing until full payment is made.
3. The comment period for today's decision [is/is not] waived.

This decision is effective today.

Dated \_\_\_\_\_, at San Francisco, California.

**APPENDIX**

**Compensation Decision Summary Information**

<b>Compensation Decision:</b>		<b>Modifies Decision?</b>	
<b>Contribution Decision(s):</b>	D.26-04-034		
<b>Proceeding(s):</b>	A.24-12-011		
<b>Author:</b>			
<b>Payer(s):</b>			

**Intervenor Information**

<b>Intervenor</b>	<b>Date Claim Filed</b>	<b>Amount Requested</b>	<b>Amount Awarded</b>	<b>Multiplier?</b>	<b>Reason Change/Disallowance</b>
CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE	6/26/26	\$28,262		N/A	

**Hourly Fee Information**

<b>First Name</b>	<b>Last Name</b>	<b>Attorney, Expert, or Advocate</b>	<b>Hourly Fee Requested</b>	<b>Year Hourly Fee Requested</b>	<b>Hourly Fee Adopted</b>
Theodore	Caretto	Attorney	\$325	2025	
Theodore	Caretto	Attorney	\$335	2026	
Shana	Lazerow	Attorney	\$755	2025	
Shana	Lazerow	Attorney	\$780	2026	

**(END OF APPENDIX)**