



Decision _____

FILED

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

06/26/26

02:59 PM

Application 24-03-019
A2403019
Filed March 29, 2024

Application of Southern California Edison Company (U 338-E) to Establish Marginal Costs, Allocate Revenues, and Design Rates	
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INTERVENOR COMPENSATION CLAIM OF CENTER FOR ACCESSIBLE TECHNOLOGY AND DECISION ON INTERVENOR COMPENSATION CLAIM OF CENTER FOR ACCESSIBLE TECHNOLOGY

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 lcompcoordinator@cpuc.ca.gov.

Intervenor: CENTER FOR ACCESSIBLE TECHNOLOGY	For contribution to Decision (D.26-04-033)	
Claimed: \$ 41,635.50	Awarded: \$	
Assigned Commissioner: Karen Douglas	Assigned ALJ: Marcelo Poirier	
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).		
Signature:		<i>/s/ Melissa W. Kasnitz</i>
Date: June 26, 2026	Printed Name:	Melissa W. Kasnitz

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

A. Brief description of Decision:	This decision addresses Southern California Edison Company’s 2024 General Rate Case Phase 2 proceeding and it approves nine settlement agreements. CforAT’s participation was focused on the Residential Rate Design Settlement Agreement, which was one of the nine settlements approved.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812¹:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	June 3, 2024	
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	July 3, 2024	
4. Was the NOI timely filed?		
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:	R.22-11-013	
6. Date of ALJ ruling:	June 14, 2023	
7. Based on another CPUC determination (specify):	CforAT's most recent ruling on eligible customer status was issued on 6/3/26 in R.24-04-010.	
8. Has the Intervenor demonstrated customer status or eligible government entity status?		
Showing of "significant financial hardship" (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	R.22-11-013	
10. Date of ALJ ruling:	June 14, 2023	
11. Based on another CPUC determination (specify):	CforAT's most recent ruling on eligible customer status was issued on 6/3/26 in R.24-04-010.	
12. Has the Intervenor demonstrated significant financial hardship?		

¹ 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.26-04-033	
14. Date of issuance of Final Order or Decision:	May 4, 2026	
15. File date of compensation request:	June 26, 2026	
16. Was the request for compensation timely?		

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

#	Intervenor's Comment(s)	CPUC Discussion

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

Revised March 2023

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>Overview: This Phase 2 General Rate Case broadly addresses SCE’s proposals regarding marginal costs, revenue allocation and rate design.</p> <p>CforAT’s participation was focused on issues of residential rate design to address issues of concern for our constituency of residential customers with disabilities and medical needs, including affordability and appropriate access to all offered rates.</p> <p>CforAT filed a protest addressing offered testimony on residential rate design issues (accepted into the record as Exhibit CforAT-01 via a ruling issued on October 29, 2025) and was a party to the Residential Rate Design Settlement Agreement submitted via motion on August 12, 2025 and approved in the final decision.</p>	<p>Decision 26-04-033 (the Final Decision) adopts multiple settlements, including the Residential Rate Design Settlement addressing issues of concern to CforAT. The discussion of the Residential Rate Design Settlement is at pages 23-28 of the Final Decision.</p>	

<p>Medical Discount:</p> <p>CforAT calls out the specific issue of the need for addressing the availability of a medical discount for any new opt-in rate because we were the party primarily responsible for consideration of this issue.</p> <p>CforAT addressed SCE’s obligation to include a medical discount in any untiered opt-in rate issue in our protest as well as our testimony. The testimony includes a discussion of discovery conducted by CforAT on this issue, with data requests and responses attached.</p> <ul style="list-style-type: none">• CforAT Protest at pp. 2-3• Exh. CforAT-01 at pp. 1-2 and attached DR responses. <p>Based on CforAT’s focus on this issue, the Medical Discount Requirement was addressed in the Residential Rate Settlement.</p>	<p>The Final Decision notes the application of the medical discount to any opt-in rate as part of its review of the settlement and confirms that the settlement is reasonable in light of the record, consistent with law and in the public interest. Final Decision at p. 26 (noting the medical discount provision) and at pp. 26-28 (analyzing and adopting the settlement).</p>	
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<p>Residential Rate Design: In addition to our targeted focus on the medical discount requirement, CforAT participated broadly on issues of residential rate design as reflected in our protest and testimony.</p> <p>This includes record development on the issue of seasonal differentials. <i>See</i> CforAT Protest at pp. 4-5; Exh. CforAT-01 at pp. 2-6 and attached DR responses and additional information.</p> <p>It also includes record development on the issue of SCE’s effective CARE discount (raised by SCE in its supplemental testimony). <i>See</i> Exh. CforAT-01 at p. 6.</p> <p>CforAT additionally addressed other issues of residential rate design during the course of the extensive settlement discussions resulting in the Residential Rate Design Settlement Agreement.</p>	<p>As noted in the Final Decision, the Residential Rate Design Settlement Agreement resolves party disputes about multiple items proposed by SCE, including baseline allowances for customers with heat pump water heaters, adjustment of TOU rate differentials, resolution of disputed issues on seasonal differentials (including a specific resolution on the seasonal differential for TOU-D-Prime), confirmation of the availability of the medical discount for all opt-in rate options, and an examination of customer enrollment in the residential heat pump water heater baseline allowance. Final Decision at pp. 23-25.</p> <p>The Final Decision adopts the proposed Residential Rate Design Settlement Agreement without modification, finding that it “is reasonable in light of the whole record, consistent with law, and in the public interest.” Final Decision at pp. 27-28.</p>	
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor’s Assertion	CPUC Discussion
a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?²	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	

² The Office of Ratepayer Advocates was renamed the Public Advocate’s Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

	Intervenor’s Assertion	CPUC Discussion
a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?²	Yes	
c. If so, provide name of other parties: Other parties that focused on residential rate design issues and joined the Residential Rate Design Settlement Agreement include Cal Advocates, SEIA and TURN, as well as SCE. In reaching a negotiated resolution of these issues, all interested parties had a shared final position on issues of residential rate design.		
d. Intervenor’s claim of non-duplication: CforAT was the only party participating on issues of residential rate design with a specific focus on the interests of residential customers with disabilities and medical needs. While many of the interests of these customers are common to other residential customer groups, CforAT also represented certain unique concerns, such as the availability of a medical discount of all available opt-in rates. Where CforAT’s perspective overlapped with those of other consumer advocates and interested parties. CforAT worked effectively and cooperatively to minimize any duplication of effort. To the extent that there was any duplication, it reflects the importance of issues of concern and the need for all interested stakeholders to consider key issues so that parties could reach a negotiated resolution.		

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):

	CPUC Discussion
a. Intervenor’s claim of cost reasonableness:	

	CPUC Discussion
<p>CforAT’s overall cost of participation is reasonable. All residential customers are impacted by the issues of residential rate design that were addressed in this proceeding, and CforAT’s constituency of utility customers with disabilities and medical needs share the interests of all residential customers in ensuring that energy bills are affordable, while also facing unique issues such as the availability of medical discounts.</p> <p>While it is difficult to assign a monetary value to CforAT’s contributions in this proceeding, CforAT’s participation ensured that the interests of our constituency were reflected in SCE’s rate designs to be implemented through this GRC cycle. The value of this representation, including the specific issues for medical customers, exceeds CforAT’s reasonable cost of participation.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>CforAT’s work in this proceeding was led by Legal Director Melissa Kasnitz, who has substantial experience in the area of rate design. Specific tasks, including participation at the PHC and discovery issues, were delegated to junior attorney Rachel Sweetnam, with appropriate supervision by Ms. Kasnitz. This delegation of work achieves overall efficiency due to the lower hourly rate charged for work by Ms. Sweetnam. When work is delegated in this way, it appropriate for the supervising attorney to confer with the junior attorney and otherwise monitor their work; when both attorneys bill time to a task it is not a duplication of effort, but rather effective delegation with supervision.</p> <p>Additionally, CforAT Legal Counsel Paul Goodman attended two settlement meetings when Ms. Kasnitz was unavailable. It is appropriate to have a senior attorney participate in important activities in place of an absent colleague in this context.</p> <p>Overall, CforAT focused our activity specifically on issues relevant to residential rate design, plus modest time spent monitoring the overall course of the proceeding. This targeted focus allowed us to best represent the interests of our constituency while maintaining a limited role in the overall GRC Phase 2 proceeding.</p>	
<p>c. Allocation of hours by issue:</p> <p style="text-align: center;">Kasnitz Hours – 2024 (12.3 hours total)</p> <p>Discovery: 2.1 hours (17%) The issue area “Discovery” reflects time spent preparing, responding to, and reviewing responses to data requests as part of developing the factual</p>	

	CPUC Discussion
<p>record. While this is identified as a separate issue area, virtually all factual development and discovery conducted by CforAT addressed issues of residential rate design.</p> <p>General Participation: 2.3 hours (19%) The issue area “General Participation” reflects time necessarily spent to monitor and engage with the overall proceeding. This includes time spent at the Prehearing Conference and time spent monitoring activity (including settlements) in areas other than residential rate design.</p> <p>Procedural: 1.5 hours (12%) The issue area “Procedural” reflects time necessarily spent on addressing procedural matters over the course of the proceeding. This includes scheduling issues, issues of case management, and other activities required by the Commission for the effective management of the proceeding.</p> <p>Res Rates: 6.4 hours (52%) The issue area “Res Rates” reflects time spent developing CforAT positions on the pending residential rate design proposals and developing the factual record to address these issues. The time includes developing testimony, reviewing other party testimony relevant to residential rate design issues, and otherwise ensuring that the needs of our constituency of residential customers with disabilities and medical needs are appropriately represented.</p> <p style="text-align: center;">Sweetnam Hours – 2024 (8.1 hours total)</p> <p>Discovery: 5.8 hours (72%)</p> <p>General Participation: 2.3 hours (28%)</p> <p style="text-align: center;">Kasnitz Hours – 2025 (32.3 hours)</p> <p>Discovery: 2.2 hours (7%)</p> <p>General Participation: 2.1 hours (6.5%)</p> <p>Procedural: 2.1 hours (6.5%)</p> <p>Res Rates: 9.5 hours (29%)</p> <p>Settlement: 16.4 hours (51%) The issue are “Settlement” reflects time spent participating in settlement efforts and the presentation of the residential rate settlement before the</p>	

	CPUC Discussion
<p>Commission for review. The vast majority of this time is associated with the development and adoption of the residential rate design settlement, but it also includes a limited number of hours reviewing other settlements presented to the Commission.</p> <p style="text-align: center;">Goodman Hours – 2025 (2.0 hours)</p> <p>Settlement: 2.0 hours (100%)</p> <p style="text-align: center;">Sweetnam Hours – 2025 (2.6 hours)</p> <p>Settlement: 2.6 hours (100%)</p> <p style="text-align: center;">Kasnitz Hours – 2026 (1.1 hours)</p> <p>Res Rates: 0.8 hours (73%)</p> <p>General Participation: 0.3 hours (27%)</p>	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Melissa W. Kasnitz	2024	12.3	\$ 735	D.24-10-028	\$ 9,040.50			
Melissa W. Kasnitz	2025	32.3	\$ 755	D.25-10-060	\$ 24,386.50			
Melissa W. Kasnitz	2026	1.1	\$ 780	See comment below	\$ 858.00			
Paul Goodman	2025	2.0	\$ 680	See comment below	\$ 1,360.00			
Rachel Sweetnam	2024	8.1	\$ 240	D.25-04-041	\$ 1,944.00			
Rachel Sweetnam	2025	2.6	\$ 275	D.25-10-050	\$ 715.00			
Subtotal: \$ 38,304.00						Subtotal: \$		

CLAIMED						CPUC AWARD		
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 \$
[Person 1]								
[Person 2]								
<i>Subtotal: \$</i>						<i>Subtotal: \$</i>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Melissa W. Kasnitz	2024	1.0	\$ 367.50	½ standard rate	\$ 367.50			
Melissa W. Kasnitz	2026	7.6	\$ 390.00	½ pending rate	\$ 2,964.00			
<i>Subtotal: \$ 3,331.50</i>						<i>Subtotal: \$</i>		
COSTS								
#	Item	Detail			Amount	Amount		
1.								
2.								
<i>Subtotal: \$</i>						<i>Subtotal: \$</i>		
TOTAL REQUEST: \$ 41,635.50						TOTAL AWARD: \$		
<p>*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.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate</p>								

CLAIMED			CPUC AWARD
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ³	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Melissa W. Kasnitz	1992	162679	No
Paul Goodman	2002	219086	No
Rached Sweetnam	2023	350075	No

C. Attachments Documenting Specific Claim and Comments on Part III:
(Intervenor completes; attachments not attached to final Decision)

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Detailed Time Records (including time on merits and on compensation issues)
	2026 Kasnitz Rate and 2025 Goodman Rate: At the time of filing, the Commission has not formally adopted a 2026 rate for Ms. Kasnitz or a 2025 rate for Mr. Goodman. However, a pending proposed compensation decision in A.23-11-002, which is set to be addressed at the Commission's upcoming voting meeting on July 2, 2026, would set both of these rates at the rates requested here, namely \$780 for Ms. Kasnitz in 2026 and \$680 for Mr. Goodman in 2025.

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))

A. Opposition: Did any party oppose the Claim?	
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If so:

³ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

Party	Reason for Opposition	CPUC Discussion

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

Party	Comment	CPUC Discussion

(Green items to be completed by Intervenor)

FINDINGS OF FACT

1. **CENTER FOR ACCESSIBLE TECHNOLOGY** [has/has not] made a substantial contribution to D.26-04-033.
2. The requested hourly rates for **CENTER FOR ACCESSIBLE TECHNOLOGY**'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. **CENTER FOR ACCESSIBLE TECHNOLOGY** is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay **CENTER FOR ACCESSIBLE TECHNOLOGY** the total award. [for multiple utilities: "Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay **CENTER FOR ACCESSIBLE TECHNOLOGY** 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 75th day after the filing of **CENTER FOR ACCESSIBLE TECHNOLOGY**’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

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D.26-04-033		
Proceeding(s):	A.24-03-019		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
CENTER FOR ACCESSIBLE TECHNOLOGY	June 26, 2026	\$ 41,635.50		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Melissa	Kasnitz	Attorney	\$ 735	2024	
Melissa	Kasnitz	Attorney	\$ 755	2025	
Melissa	Kasnitz	Attorney	\$ 780	2026	
Paul	Goodman	Attorney	\$ 680	2025	
Rachel	Sweetnam	Attorney	\$ 240	2024	
Rachel	Sweetnam	Attorney	\$ 275	2025	

(END OF APPENDIX)