



STATE OF CALIFORNIA

GAVIN NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

FILED

07/08/26

11:33 AM

R1812006

July 8, 2026

Agenda ID#24358
Quasi-Legislative

TO PARTIES OF RECORD IN RULEMAKING 18-12-006:

This is the proposed decision of Administrative Law Judge Marcello Poirier and Administrative Law Judge Colin Rizzo. 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 August 13, 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: asf
Attachment

Decision **PROPOSED DECISION OF ALJ POIRIER AND ALJ RIZZO (Mailed 7/8/2026)****BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**Order Instituting Rulemaking to Continue the Development
of Rates and Infrastructure for Vehicle Electrification.Rulemaking 18-12-006
(Filed December 13, 2018)**DECISION GRANTING COMPENSATION TO GREEN POWER INSTITUTE FOR
CONTRIBUTION TO DECISION 22-11-040**

Intervenor: Green Power Institute	For contribution to Decision (D.) 22-11-040
Claimed: \$70,721 ⁹	Awarded: \$35,431.25
Assigned Commissioner: John Reynolds ¹	Assigned ALJs: Marcelo Poirier and Colin Rizzo ²

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	Decision D.22-11-040 adopts a transportation electrification policy and investment framework.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812³:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	March 1, 2019	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	March 29, 2019	Verified

¹ R.18-12-006 was assigned to Commissioner John Reynolds on March 25, 2026.² R.18-12-006 was assigned to ALJ Marcelo Poirier on June 29, 2022 and co-assigned to ALJ Colin Rizzo on February 15, 2023.³ All statutory references are to California Public Utilities Code unless indicated otherwise.

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:	R.20-05-002	A.18-06-015
6. Date of ALJ ruling:	November 20, 2020	January 23, 2019
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:	R.20-05-002	A.18-06-015
10. Date of ALJ ruling:	November 20, 2020	January 23, 2019
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.22-11-040	Verified
14. Date of issuance of Final Order or Decision:	November 21, 2022	Verified
15. File date of compensation request:	Jan. 13, 2023	Verified; amended claim filed on May 12, 2023.
16. Was the request for compensation timely?		Yes

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
	(Please note that Attachment 2 includes a list of issue areas, and of GPI Pleadings relevant to this Claim.)	Noted

<p>1. Process / Timelines / Budget.</p> <p>The state of California has set a policy favoring transportation electrification as an essential element of its efforts to fight climate change. For its part the Commission has been pursuing a range of programs supporting the development of the infrastructure needed to service the electric transportation sector. Decision D.22-11-040, which is a part of those efforts, adopts a transportation electrification policy and investment framework for the Commission. The GPI made multiple substantial contributions to the Decision by supplying a variety of proposals in the areas of process, timelines, and budget. Many of our arguments are cited in the Decision, as noted in the quotes in the column to the right. The Commission adopted many of our positions, and in cases where our positions were declined, we made substantial contributions by enriching the record underlying the Decision.</p>	<p>Decision D.22-11-040</p> <p>GPI suggests two different timelines: (1) five-year funding cycles for IOU ratepayer investment and (2) ten-year strategies for meeting TE goals, as described in the Draft TEF via the IOU TE plans or TEPs, updated every five years. Pg. 73.</p> <p>Several parties indicate that the Commission should allow the IOUs to propose additional programs and/or pilots during FC1, if merited, to meet California’s clean transportation goals. Pg. 75.</p> <p>GPI recommends a default one-year grace period with the option to submit a request for an additional one-year extension to wind down FC0. Pg. 77.</p> <p>ATE and GPI support adoption of FC2 guidance along with the adoption of FC1, with GPI indicating that this would help avoid any gaps between the programs. ... [new paragraph] We find it appropriate to adopt a timeline and process for the development of FC2 guidance. The development of FC2 shall be based on the evaluation of the FC1 program, additional BTM infrastructure needs, and an assessment of the continued role of IOUs in supporting BTM infrastructure. Pgs. 84-85.</p> <p>Several parties find the proposed budget level reasonable, ChargePoint, CSE and GPI support the \$1 billion budget. Pg. 88.</p> <p>GPI supports the eight percent cap but cautions that the Commission should clarify that programs costs are not automatically approved and must be justified. Pgs. 93-94.</p>	<p>Verified⁴</p>
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⁴ On April 25, 2022, Green Power Institute properly served its comments on the Assigned Commissioner's Ruling and Staff Proposal but did not submit them for filing on that date. After consultation with the assigned ALJs in this proceeding, the comments were submitted and accepted for formal filing as of April 25, 2022 – the date when they were served. As such, these comments are considered in the review of the Green Power Institute’s request for compensation.

	<p>In contrast, PG&E, EDF, and GPI support alternatives to a rebate program such as on-bill financing. Pg. 107.</p> <p>Parties generally agree that the proposed scope is appropriate, but some parties recommend additions to the scope. Pg. 121.</p> <p>GPI also supports the proposal and recommends reassessing the allocation before the beginning of FC1 and during a Mid-Cycle Assessment. Pg. 153</p> <p>Several parties support one Program Administrator for both MDHD and LD components of the program to ensure simplicity, cost containment and a consistent customer experience. Pg. 163.</p> <p>GPI supports the proposal to leverage existing PAC meetings to host an annual or biennial roundtable discussion to identify program modifications. Pg. 186.</p> <p>Pleadings</p> <p>Given the request by parties for shorter planning cycles and more flexibility (ACR, p. 12), we suggest a default 1 year grace period with the option to submit a request for an additional 1 year extension (2 year grace period total if extension is approved) to wind down FC0. [Comments 4/25. Pg 4.]</p> <p>GPI suggests two different timelines. We recommend:</p> <ol style="list-style-type: none"> 1) Five-year funding cycles for IOU ratepayer investment 2) Ten-year strategies for meeting TE goals, as described in IOU TE plans (updated every 5 years) <p>[Comments 4/25. Pg 5.]</p> <p>GPI does not support an annual cap. The five-year budget should also be the funding cap in order to provide IOUs flexibility in determining the timing and extent of funding each year. [Comments 4/25. Pg 7.]</p>	
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	<p>GPI agrees that OBF [on-bill financing] should be considered as an additional financing option for the reasons offered by PG&E. [Reply 5/16. Pg 1.]</p> <p>The PD declines to adopt the draft Transportation Electrification Framework (TEF), developed by Energy Division staff with numerous rounds of written feedback from parties over the last two years ... While this new approach was a surprise to GPI and most other parties, GPI supports this new approach and much of the rest of the policy decisions in the PD. [Comments 11/3. Pg 1.]</p> <p>The PD proposes that public MUD-serving chargers must be open to the public 24 hours per day, seven days a week. While GPI understands the intent of this requirement, we are concerned that this could leave out some otherwise ideal sites. There may be some shopping centers, professional buildings or other destinations that may be the only commercial buildings adjacent to or close to MUDs but be closed at night. These sites may also be inexpensive to retrofit and should not be excluded. We instead recommend that a limited amount of sites be allowed in FC1 that offer reasonable opening hours. GPI suggests allowing up to 20% of sites that are open at least 14 hours/day, 7 days a week, with the other 80% requiring 24/7 access. [Comments 11/3. Pg 11.]</p> <p>GPI agrees with SCE that the Commission should set a December 2026 deadline for existing TE programs to accept applications or commitments. SCE writes persuasively that requiring all spending to be complete by December 2026 is likely to create customer confusion and lead to inefficiencies, as the utilities would need to forecast when to stop accepting applications in order to complete projects by December 2026. Construction schedule and permitting delays are common in charger installations, and it would be</p>	
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	<p>inefficient to have projects get almost to the finish line, only to then be disallowed if they don't make a strict deadline. SCE's proposal to require that all applications be completed by December 31, 2026 would ensure more certainty for participants that experience delays in their projects. [Reply 11/8. Pg 2.]</p>	
<p>2. Market Education and Outreach (ME&O).</p> <p>The GPI has long championed the need for strong ME&O in fostering the transition to electrified transportation, and we continued that effort during the development of the Staff Proposal and Proposed Decision that are the subject of this Claim. GPI made substantial contributions to Decision D.22-11-040 by advocating for more funding for ME&O, specifically for funding ME&O at the level of 10 percent of program costs, and for performing ME&O both pre- and post-opening of charging stations of all varieties. The Commission did not adopt our 10 percent minimum funding levels, but it did acknowledge the need for more robust ME&O, including after charging stations are commissioned, and it adopted our positions regarding bringing CBOs and CCAs into the ME&O process. All of this represents substantial contributions.</p>	<p>Decision D.22-11-040</p> <p>GPI asserts that ME&O efforts are critical to increase charger utilization and recommends the IOUs pursue a collaborative ME&O strategy with CBOs, customers, and EVSPs. ... We agree that ME&O efforts are critical to EV charger utilization and find that post-energization ME&O may help to increase charger utilization rates. Pgs. 62-63.</p> <p>GPI emphasizes the need for enhanced post-energization ME&O in underserved communities to drive higher EV adoption. Pg. 125.</p> <p>GPI and NDC advocate for a ten percent cap for ME&O due to concerns about low utilization rates for chargers as well as difficulty reaching low-income, minority, and other underserved communities. Pg. 95.</p> <p>GPI also contends that CBOs and CCAs should be able to compete for contracts for post-energization. Pg. 127.</p> <p>Several parties, including Auto Innovators, GPI, GRID, PG&E, and the Joint CCAs, advocate for direct CCA involvement in developing and administering the ME&O component, with a portion of the ME&O budget allocated to CCAs. Pg. 129.</p> <p>Pleadings</p> <p>IOUs should be required to consult with appropriate CBOs from throughout their territory at regular stakeholder meetings during program design and implementation. As the EV market matures, there are many</p>	<p>Verified⁴</p>

	<p>CBOs with significant EV experience and/or experience reaching underserved communities. These CBOs should be engaged to help with effective program design and also provide feedback on implementation challenges and help with program iterations. [Comments 4/25. Pg 10.]</p> <p>CCAs should take the lead on ME&O development and implementation in their service territories. ME&O initiatives should be co-developed with CCAs working closely with IOUs to harness collective insights and to then present a unified message to ratepayers. We recommend allocating a proportionate share (based on population) of the ME&O budget to CCAs if the CCA agrees to accept funding. [Comments 4/25. Pg 11.]</p> <p>GPI is concerned that an increase in TA budget might come at the expense of the ME&O budget. We ask the Commission to be more explicit in how the TA and ME&O budgets are set, and to set specific percentages for each of these efforts. GPI has consistently called for higher funding for ME&O activities and does not support an unduly low combined 6% cap for ME&O and TE advisory services. [Reply 5/16. Pg 3.]</p> <p>GPI agrees with EDF that the Staff Proposal section on ME&O is both too short and lacking in detail. GPI has argued for years about the need to increase ME&O and utilize CBOs more effectively. A key area in which this could be done is post-energization ME&O at ratepayer- funded charger sites. This would allow many Californians that have new charging access to receive a crash course in electric vehicles. PG&E’s data from its EV Charge 2 application (A.21-10-010) cites three times the utilization rates at sites that received post-energization ME&O. [Reply 5/16. Pg 12.]</p> <p>While GPI supports no more than 50% of rebates being directed toward underserved</p>	
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	<p>communities, we support a higher level of ME&O funding going toward underserved communities, particularly for post-energization ME&O to encourage EV adoption and higher utilization of ratepayer funded sites. There is a real risk that massive IOU investment will go into building chargers in underserved communities, but due to additional barriers for these communities to use EVs, these chargers will remain underutilized. GPI has written extensively in this proceeding, A.21-10.010 (PG&E EV Charge2) and other proceedings on the need for robust post-energization ME&O. [Comments 11/3. Pg 7.]</p> <p>GPI has consistently argued for the importance of ME&O of various kinds, including targeted ME&O and post-energization ME&O, and we are gratified to see PG&E’s documentation that several site hosts in EVCN that performed post-energization ME&O saw three times higher utilization than the program average. [Comments 11/3. Pg 10.]</p> <p>Post-energization ME&O has a significant potential to increase EV adoption in underserved communities and to provide greater ratepayer return on charger investments. GPI would like the final decision to be more explicit about the budget dedicated to post-energization ME&O. [Reply 11/8. Pg 2.]</p>	
<p>3. Vehicle Grid Integration and Grid Stability.</p> <p>The GPI identified the absence of considerations of vehicle grid integration (VGI) in the TE framework as a major omission, arguing that VGI is the difference between making EVs a contributory component to grid stability, or letting EVs</p>	<p>Decision D.22-11-040</p> <p>GPI requests that the Commission require the IOUs to address SB 676 in their draft TEPs as soon as 2024. Pg. 60.</p> <p>Several parties submit comments regarding VGI strategy. Some parties emphasize the need for the Commission to better articulate a VGI strategy and create milestones in key areas of stakeholder concern, including</p>	<p>Verified</p>

<p>be a drag on the grid. The GPI made substantial contributions to Decision D.22-11-040 by arguing for making VGI a central component of the transportation electrification framework, and for the extensive use of TOU pricing at all kinds of commercial charging stations in order to provide customers with accurate price signals. The Decision expressly agrees with virtually all of our VGI-related arguments. In cases where the Commission did not adopt our positions, we made a substantial contribution by enriching the record underlying the Decision.</p>	<p>technology enablement and price signals. Pg. 171.</p> <p>For the first strategic focus area concerning rates and demand flexibility programs, parties have rightly noted that rates will be a core component of enabling VGI. Pg. 172.</p> <p>GPI and SBUA support the inclusion of incentives to encourage customers to participate in DR and implement other load management practices. Pg. 175.</p> <p>Pleadings</p> <p>GPI strongly recommends that all IOU-funded chargers should be required to take service under TOU tariffs, and that full TOU pricing is passed along to all public charging sites, including semi-private MUD charging sites. This would ensure that EVs help rather than hinder grid stability. [Reply 5/16. Pg 5.]</p> <p>GPI strongly agrees with these comments and the need for the Commission to develop more robust planning around EVs and grid integration, including mandating pass-through of TOU pricing in order to reduce costs at certain times of day and improve grid operations, and also doing far more on V1G, V2G and other VGI policies that will promote use of EVs as grid assets – a set of policies that have been needlessly delayed now for over a decade. [Reply 5/16. Pgs 10-11.]</p> <p>GPI agrees with VGIC that it is concerning that VGI strategies are almost entirely absent from the staff proposal. VGI has immense promise to lower the cost of deploying infrastructure, integrate more renewable energy into the grid, and provide other benefits. GPI urges the Commission to consider all of VGIC’s comments carefully. [Reply 5/16. Pg 13.]</p> <p>The PD does not mention renewables integration as a key goal of higher EV adoption, but this is a longstanding feature of higher EV adoption, and has been highlighted</p>	
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	<p>in previous Commission statements on potential benefits of EV adoption. Day-time EV charging, in particular, can turn the “problem” of too much solar energy on the grid during peak production hours around mid- day and early afternoon, into a major benefit in terms of very low-cost (or even no cost or negative cost) EV charging as well as stationary storage charging. [Comments 11/3. Pgs 7-8.]</p>	
<p>4. Environmental Justice.</p> <p>The GPI made substantial contributions to Decision D.22-11-040 by supporting social equity in the use of funds for transportation electrification (TE) investments, advocating for increased and better targeted use of funds for ME&O in DAC communities, and proposing initiatives to target investments to promote charging by disadvantaged customers. We note that we argued that funds for chargers in MFHs targeted at DACs should be limited to 35 percent, rather than the 50 percent level in the Staff Proposal and PD. The final Decision adopted most of our positions in the environmental justice area, and while it rejects our position on the 35 vs 50 percent funding issue for MFHs, we made a substantial contribution by enriching the record underlying the Decision.</p>	<p>Decision D.22-11-040</p> <p>GPI contends that IOUs should be required to consult with the appropriate CBOs at stakeholder meetings during program design and implementation. Pg. 126.</p> <p>Several parties [including GPI] support increased MDHD rebates for customers in DACs. Pg. 136.</p> <p>Only GPI argues for a lower amount—35 percent—in order to better balance competing public policy interests of encouraging EV adoption, promoting higher charger utilization, and a focusing on undeserved communities. Pg. 138.</p> <p>Pleadings</p> <p>We recommend a 35% level, rather than 50%, for investment in MFHs in underserved communities in order to achieve a better balance between the sometimes competing public policy interests of promoting EV adoption, higher charger utilization, and a focus on underserved communities. [Comments 4/25. Pg 12.]</p> <p>Yes, and such a roundtable [reviewing the program’s efficacy in addressing equity] should review the effectiveness of underserved community programs, charger utilization, EV purchases/leasing increases in these communities, and related issues. We also recommend</p>	<p>Verified⁴</p>

	<p>performing an equity and environmental justice study using, for example, the TotalView Energy Platform mentioned above to leverage quantitative metrics how environmental and health externalities are expected to change with TE and electricity grid expansion initiatives to better assess and revise program impacts and efficacy. [Comments 4/25. Pg 15.]</p> <p>GPI/CEC recommended piloting dual workplace/MUD charging options to increase utilization of Level 2 EVSE at workplaces, with MUD tenants encouraged to use workplace charging infrastructure during non-business hours. TURN supported this proposal. [D.21-07-028, pg. 52).]</p> <p>This proposal not only ensures the equitable distribution of charging infrastructure, but removes the financial barrier to Level 2 EVSE installation that many homeowners and renters of single family homes face in underserved communities. Moreover, this proposal can assist “supercommuters” that have daily commutes that exceed the capability of Level 1 charging. [D.21-07-028, pg. 63, footnoted to GPI.)]</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?	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: TURN, Tesla, Alliance for Automotive Innovation, ChargePoint, Electric Vehicle Assoc., NRDC, UCS, Sierra Club, EDF, and the three large electric IOUs.		Noted
d. Intervenor’s claim of non-duplication: This proceeding covers a wide variety of topics related to California’s transportation electrification program. The Green Power Institute has been an active participant in the Commission’s clean energy proceedings and is continuing these efforts in the present proceeding (R.18-12-006).		Noted

<p>The Green Power Institute coordinated its efforts in this proceeding with other parties in order to avoid duplication of effort, and added significantly to the outcome of the Commission’s deliberations through our own unique perspective. Some amount of duplication has occurred in this proceeding on all sides of contentious issues, but Green Power avoided duplication to the extent possible, and tried to minimize it where it was unavoidable.</p>	
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PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
<p>a. Intervenor’s claim of cost reasonableness:</p> <p>The GPI is providing, in Attachment 2, a listing of all of the pleadings we provided in this Proceeding, R.18-12-006, that are relevant to matters covered by this Claim, and in Attachment 3 a detailed breakdown of GPI staff time spent for work performed that was directly related to our substantial contributions to Decision D.22-11-040.</p> <p>The hours claimed herein in support of Decision D.22-11-040 are reasonable given the scope of the Proceeding, and the strong participation by the GPI. GPI staff maintained detailed contemporaneous time records indicating the number of hours devoted to the matters settled by these Decisions in this case. In preparing Attachment 3, Dr. Morris reviewed all of the recorded hours devoted to this proceeding, and included only those that were reasonable and contributory to the underlying tasks. As a result, the GPI submits that all of the hours included in the attachment are reasonable, and should be compensated in full.</p> <p>Dr. Morris is a renewable energy analyst and consultant with more than 35 years of diversified experience and accomplishments in the energy and environmental fields. He is a nationally recognized expert on biomass and renewable energy, climate change and greenhouse-gas emissions analysis, integrated resources planning, and analysis of the environmental impacts of electric power generation. Dr. Morris holds a BA in Natural Science from the University of Pennsylvania, an MSc in Biochemistry from the University of Toronto, and a PhD in Energy and Resources from the University of California, Berkeley.</p> <p>Dr. Morris has been actively involved in electric utility restructuring in California throughout the past two decades. He served as editor and facilitator for the Renewables Working Group to the California Public Utilities Commission in 1996 during the original restructuring effort, consultant to the CEC Renewables Program Committee, consultant to the Governor’s Office of Planning and Research on renewable energy policy during the energy crisis years, and has provided expert testimony in a variety of regulatory and legislative proceedings, as well as in civil litigation.</p> <p>Mr. Hunt is a renewable energy law and policy expert with substantial experience in California, in local energy planning and in state energy-policy</p>	<p>After the adjustments made to this claim, the remainder of the claimed costs are reasonable. <i>See Part III.D.</i></p>

<p>development. He has worked with local governments throughout Southern California, in his current role with Community Renewable Solutions LLC and in his previous role as Energy Program Director for the Community Environmental Council, a well-known non-profit organization based in Santa Barbara. Mr. Hunt was the lead author of the Community Environmental Council's A New Energy Direction, a blueprint for Santa Barbara County to wean itself from fossil fuels by 2030. Mr. Hunt also contributes substantially to state policy, in Sacramento at the Legislature, and in San Francisco at the California Public Utilities Commission, in various proceedings related to renewable energy, energy efficiency, community-scale energy projects, and climate change policy. Mr. Hunt is also a Lecturer in Climate Change Law and Policy at UC Santa Barbara's Bren School of Environmental Science & Management (a graduate-level program) from 2007-2014. He received his law degree from the UCLA School of Law in 2001, where he was chief managing director of the Journal for International Law and Foreign Affairs. Mr. Hunt is a regular columnist at GreenTechMedia.com.</p> <p>Mr. Chiacos is the Director of Climate Policy at Community Environmental Council and is a clean energy and electric vehicle expert and consultant with more than 20 years of experience and accomplishments in the electric vehicle and clean energy fields. In 2010, he founded ElectricDrive805, which is the official EV Readiness group for the Central Coast region of Ventura, Santa Barbara, and San Luis Obispo counties. Mr. Chiacos has led development of multiple regional EV Readiness Plans, funded by the California Energy Commission, and has worked with dozens of local businesses and governments to develop EV friendly policies and install charging stations. Mr. Chiacos has also led dozens of consumer facing EV education events annually such as National Drive Electric Week and the Santa Barbara Green Car Show, which attracts 35,000 people as part of Earth Day and features over 40 EVs and a Ride and Drive. Mr. Chiacos also has extensive lived experience with plug-in vehicles, having driven them since 2012.</p>							
<p>b. Reasonableness of hours claimed:</p> <p>The GPI made Significant Contributions to Decision D.22-11-040 by actively participating in workshops and working groups, and providing a series of Commission filings on the various topics that were under consideration in the Proceeding and are covered by this Claim. Attachment 3 provides a detailed breakdown of the hours that were expended in making our Contributions. The hourly rates and costs claimed are reasonable and consistent with awards to other intervenors with comparable experience and expertise. The Commission should grant the GPI's claim in its entirety.</p>	<p>After the adjustments made to this claim, the remainder of the claimed hours are reasonable. <i>See Part III.D.</i></p>						
<p>c. Allocation of hours by issue:</p> <table border="0" style="width: 100%;"> <tr> <td style="width: 60%;">1. Process / Timelines / Budget</td> <td style="width: 20%; text-align: right;">55%</td> </tr> <tr> <td>2. Market Education and Outreach</td> <td style="text-align: right;">25%</td> </tr> <tr> <td>3. Vehicle Grid Integration and Grid Stability</td> <td style="text-align: right;">15%</td> </tr> </table>	1. Process / Timelines / Budget	55%	2. Market Education and Outreach	25%	3. Vehicle Grid Integration and Grid Stability	15%	<p>Noted; hours total 100%.</p>
1. Process / Timelines / Budget	55%						
2. Market Education and Outreach	25%						
3. Vehicle Grid Integration and Grid Stability	15%						

4. Environmental Justice	5%	
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B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
G. Morris	2022	5.00	\$465	See comment 1	\$2,325	5.00	\$450.00 [1, 8]	\$2,250.00
T. Hunt	2021	4.50	\$585	D.22-06-041	\$2,633 ⁵	4.50	\$475.00 [2, 8]	\$2,137.50
T. Hunt	2022	85.25	\$605	See comment 2	\$51,576 ⁵	78.25 [4]	\$605.00 [2, 8]	\$47,341.25
M. Chiacos	2021	7.25	\$300	See comment 3	\$2,175	0 [5]	N/A [3]	\$0.00
M. Chiacos	2022	26.75	\$310	See comment 3	\$8,293 ⁶	0 [5]	N/A [3]	\$0.00
Subtotal: \$67,001⁷						Subtotal 1: \$51,728.75		
						Adjustment: -\$18,097.50 [7]		
						Subtotal 2: \$33,631.25		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
G. Morris	2022	16.00 ⁸	232.5	½ 2022 rate	3,720	8.00 [6]	\$225.00 [1, 8]	\$1,800.00
Subtotal: \$3,720						Subtotal 3: \$1,800.00		
TOTAL REQUEST: \$70,721⁹						TOTAL AWARD: \$35,431.25		

⁵ Hunt’s correct requested total for 2021 is \$2,632.50. Hunt’s correct requested total for 2022 is \$51,576.25.

⁶ Chiacos’ correct request total for 2022 is \$8,292.50.

⁷ GPI’s correct subtotal for attorney, expert, and advocate fees is \$67,001.25.

⁸ GPI’s submitted timesheet shows 21.00 hours in 2022 and 7.00 hours in 2023 dedicated to intervenor compensation claim preparation for Morris.

⁹ GPI’s correct total request is \$70,721.25. We remind GPI to not round their request to the nearest dollar amounts.

*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 ¹⁰	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Tamlyn Hunt	November 2001 ¹¹	218673	No

C. Attachments Documenting Specific Claim and Comments on Part III:¹²

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Allocation of effort by issue, list of pleadings, travel receipts
Attachment 3	Breakdown of hourly efforts by issue category
Comment 1	Public Policy / Regulatory Affairs Expert Gregg Morris has an approved 2021 rate of \$450/hr (D.22-06-041). The Commission has adopted a 3.31 percent adjustment for rates in the Market Rate Study for converting the 2021 values in the study to 2022 values. This value can be found on the Escalation tab of the Hourly Rate Chart spreadsheet on the Commission's web site. We apply the 3.31 percent escalator to the approved 2021 hourly rate for Morris and round to the nearest 5 per regular Commission practice, which produces a 2022 rate of \$465/hr.
Comment 2	The Commission has adopted a 3.31 percent adjustment for rates in the Market Rate Study for converting the 2021 values in the study to 2022 values. This value can be found on the Escalation tab of the Hourly Rate Chart spreadsheet on the Commission's web site. We apply the 3.31 percent escalator to the approved 2021 hourly rate for Hunt, and round to the nearest 5 per regular Commission practice, which produces a 2022 rate of \$605/hr.
Comment 3	Energy and Resources Expert Michael Chiacos qualifies as Level V in the Commission's 2021 hourly rate chart, with more than 20 years of experience (see

¹⁰ This information may be obtained through the State Bar of California's website at <https://apps.calbar.ca.gov/attorney/LicenseeSearch/QuickSearch>.

¹¹ The State Bar of California's website shows the correct admission date for Hunt is January 29, 2002.

¹² Attachments are not included in the final decision.

	attachment 4, Chiacos resume). Energy and Resources Specialist Level V has an hourly rate range of \$169-357, with a median rate of \$241. Mr. Chiacos has an approved 2020 rate of \$280. We are asking for an hourly rate for Mr. Chicos for 2021 of \$300, which is well within the bounds of the Commission's adopted market rate study for practitioners with Mr. Chiacos' expertise and experience. We apply the 3.31 percent escalator to the requested 2021 hourly rate for Chiacos and round to the nearest 5 per regular Commission practice, which produces a 2022 rate of \$310/hr.
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D. CPUC Comments, Disallowances, and Adjustments

On September 16, 2025, a ruling was issued requesting GPI to submit additional information for various claims because the Commission had identified several issues within the claims, including: omission of required information, unclear or inconsistent details, invoices that did not align with submitted timesheets or hours claimed, invoices that included work unrelated to the claim at issue, making it difficult to determine which rates / hours apply to the specific claim, invoices billed to other entities that did not identify GPI or the consultant, and other inconsistencies that hindered the Commission's ability to evaluate and resolve the claims.

GPI was provided with an opportunity to submit supplemental information, including resumes for all individuals for whom compensation is sought, invoices reflecting the actual billed rates for each consultant (broken down by claim), and consultant agreements for those retained on a contingency basis, where payment of consulting fees is deferred and contingent upon the receipt of an IComp award.

GPI filed its response for supplement information for this proceeding on October 3 and 6, 2025. In its response, GPI confirmed the following:

1. GPI is a program of the Pacific Institute and is not a separate or independent entity and does not conduct business outside of or apart from the Pacific Institute.
2. GPI is a registered fictitious business name of the Pacific Institute and is the renewable energy program of the Pacific Institute.¹³ (However, the Commission notes that this fictitious business name expired in 2018).
3. Gregg Morris' agreement with the Pacific Institute is that when intervenor compensation payments are made to GPI, the Pacific Institute retains their overhead charge and pays the rest to Morris via Future Resources Associates, his dba company.
4. Through Future Resources Associates, Morris pays consultants an initial upfront payment (typically 25–50 percent of the approved rate), followed by a second payment (typically 15–40 percent of the approved rate) once the intervenor compensation award is issued).

¹³ Public records found at Alameda County Clerk Recorder Office's reflect that fictitious business name Green Power Institute, was active from 6/11/2013 to 6/11/2018 and is currently expired.

5. GPI states that the remaining award is used to pay the carrying costs of participation in Commission proceedings, the cost of the risk that not all hours in a given claim will be approved for payment, and the salary of Morris.
6. GPI states that Morris works entirely on a contingency basis and does not issue monthly invoices.

We make the following adjustments below based on the information at hand and an assessment of GPI’s contribution to the decision.

Item	Reason
[1] Gregg Morris’ 2022 Hourly Rate	<p>Although GPI continues to identify Morris as an employee of GPI, serving as its director, supplemental information provides conflicting information and confirms that Morris is dba Future Resources Associates, working on a contingency basis for the Pacific Institute, where Morris has agreed to defer his consulting fee contingent upon receipt of this intervenor compensation award.</p> <p>Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on Morris' experience as an Advocate - Executive Director - Level V.</p> <p>Given Morris’ experience, we approve an hourly rate of \$450 for 2022. We apply one-half of Morris’ approved 2022 rate of \$450.00 for an Intervenor Compensation Claim Preparation rate of \$225.</p>
[2] Tamlyn Hunt’s 2021 & 2022 Hourly Rates	<p>Although GPI continues to identify Hunt as a staff associate of GPI, supplemental information provided confirms that Hunt works for Community Renewables Solutions LLC, who in turn bills Future Resources Associates, (not GPI or the Pacific Institute) for work in this proceeding.</p> <p>The Commission requested supplemental documentation be submitted by GPI to confirm the rates charged by Hunt. GPI filed the “Associate Service Agreement Addendum”¹⁴ between Future Resources Associates (Morris) and Community Renewables Solutions LLC (Hunt) under seal, but claims that per the terms of the contract, Hunt has been hired on a contingency basis, where Hunt receives an initial payment upon invoicing, followed by a second payment contingent upon this receipt of this intervenor compensation award.</p>

¹⁴ GPI did not provide the existing Associate Services Agreement it references from October 2010 as part of its supplemental documentation. While the Commission will accept the Addendum as a contractual agreement between Future Resources Associates (Morris) and Community Renewables Solutions LLC (Hunt), for purposes of this proceeding, GPI is reminded that the Commission strictly requires full and accurate disclosure of all information material to request for intervenor compensation.

	<p>Based on these terms, we approve an hourly rate of \$475 for 2021, and \$605 for 2022.</p> <p>The rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission’s policy on consultant compensation, and the understanding that the consultant has not billed or collected full compensation for the work performed until the final award is given.</p> <p>We reiterate that it is the responsibility of the intervenor to be forthcoming about engaging consultants and the terms of the contract, to adhere to the Commission’s policy on compensation for consultant fees, and to provide the appropriate documentation with the initial claim to ensure efficient processing and thus avoid the need for the Commission to request supplemental documentation. In this instance, GPI did not provide all the documentation pertaining to the contract terms in the initial claim and waited until the Commission requested supplemental documentation, which significantly delayed the processing of this claim.</p>
<p>[3] Michael Chiacos’ 2021 & 2022 Hourly Rates</p>	<p>Although GPI continues to identify Chiacos as a staff associate of GPI, supplemental information provided confirms that Chiacos is a consultant, who in turn bills Future Resources Associates, (not GPI or the Pacific Institute) for work in this proceeding.</p> <p>GPI did not provide any documentation supporting Chiacos’ requested rates in the initial claim but was provided with another opportunity to verify Chiacos’ rates and hours by providing invoices reflecting the actual billed rates, and / or consultant agreements for work in this proceeding.</p> <p>However, GPI still failed to provide invoices or a consulting agreement for Chiacos’ work in this proceeding. Therefore, we are unable to verify the requested rate, payment terms, or hours. Consequently, no hourly rate or hours are awarded for Chiacos for 2021 and 2022.</p> <p>We reiterate that it is the responsibility of the intervenor to be forthcoming about engaging consultants and the terms of the contract, to adhere to the Commission’s policy on compensation for consultant fees, and to provide the appropriate documentation with the initial claim to ensure efficient processing and avoid supplemental requests. In this instance, GPI did not provide the documentation pertaining to the contract terms between GPI and Chiacos in the initial claim, even after a subsequent opportunity to do so.</p>
<p>[4] Hunt’s 2022 Hours -</p>	<p>Pub. Util. Code §1802(j) states that a substantial contribution means that in the judgment of the commission, the intervenor “has substantially</p>

<p>Lack of Substantial Contribution</p>	<p>assisted the commission in the making of its order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer.” The courts have addressed the requirement of substantial contribution in, for example, TURN v. CPUC 166 Cal.App. 4th 522 (2008), stating at 11:</p> <p>“[T]o be eligible for compensation, the statute requires that the customer have made a ‘substantial contribution’ to the PUC’s proceedings, as the PUC determines. “‘Substantial contribution’ means that, in the judgment of the commission, the customer’s presentation has substantially assisted the commission in the making of its order or decision....”</p> <p>In evaluating whether GPI made a substantial contribution here, the Commission evaluates whether the hours claimed were commensurate with the contributions claimed by the intervenor. Making a substantial contribution in and of itself does not entitle an intervenor to all its claimed fees and costs. Compensation is granted for efficient, meaningful contributions.</p> <p>GPI claims 2.5 hours for Hunt in November and December 2022 for work related to reviewing the final decision, D.22-11-040. Because this work did not substantially contribute to the Commission decision, as the decision had already been issued, these hours are reduced.</p> <p>GPI claims 2.75 hours for work related to SCE Advice Letter 4776-E that did not have a bearing on D.22-11-040. Because this work did not substantially contribute to the Commission decision, these hours are reduced.</p> <p>GPI claims 1.75 hours for attending a PG&E clean energy financing seminar, which did not have a bearing on D.22-11-040. Because this work did not substantially contribute to the Commission decision, these hours are reduced.</p>
<p>[5] Chiacos’ 2021 & 2022 Hours - Lack of Substantial Contribution</p>	<p>Although we do not award any rates or hours to Chiacos for failure to provide the required documentation (see above), we note that the 34 hours claimed here were reviewed and were determined to have limited impact on the decision-making process. Therefore, even if GPI had filed the requested documentation to verify Chiacos’ rates and hours, these hours would have been reduced regardless.</p>
<p>[6] Inefficient IComp Claim Preparation Hours</p>	<p>Morris spent 21.00 hours dedicated to IComp claim preparation in 2022 and 7.00 hours in 2023.</p>

	<p>We note that in Part III.B., GPI did not list any 2023 IComp claim preparation hours for Morris. We find the hours submitted by GPI to be unreasonable and inefficient given the relatively small scope of the work produced. This inefficiency is particularly notable given that almost all hours and tasks, except for five hours for Morris in 2022, were performed by consultants who maintain their own detailed billing and time tracking records. Additionally, we note that there were several issues with the claim, including omission of required information, unclear or inconsistent details, and other inconsistencies that hindered the Commission’s ability to evaluate and resolve the claim.</p> <p>We therefore reduce 13 hours of IComp claim preparation in 2022 and 7 hours in 2023, for a total of 8.00 hours awarded.</p>
<p>[7] Disallowance of Excess Compensation Exceeding Actual Consultant Costs</p>	<p>Upon closer review of the Associate Service Agreement Addendum, we find that the compensation GPI is requesting for the consultant’s time significantly exceeds the actual rate and compensation the consultant would receive under the contract terms.</p> <p>The Intervenor Compensation Program is funded by ratepayers and is intended to reimburse reasonable costs of participation rather than generate profit from outsourced consultant services. As established in D.07-01-009, D.08-04-010, and Resolution ALJ-235, the rate requested by an intervenor must not exceed the actual rate billed by the consultant.¹⁵ Because the consultant has agreed to be paid a percentage of the Commission approved rate and hours, the requested compensation in this claim does not accurately reflect the actual cost of the consultant’s services. Compensating GPI the full request would result in an overpayment with the remaining balance retained by Morris, dba Future Resources Associates, instead of covering the consultant’s actual fees. Therefore, in instances where compensation to the intervenor for a consultant’s time exceeds the amount the intervenor will actually pay the consultant under their contract terms, the Commission will reduce the award to match the actual cost incurred.</p> <p>Here, we reduce the award by \$18,097.50 to ensure that the amount awarded in this claim for the consultant’s services aligns with the actual compensation terms established in the Associate Service Agreement Addendum. Because the Associate Service Agreement Addendum between Future Resources Associates and Community Renewables Solutions LLC was filed under seal, we do not disclose here how the reduction is specifically calculated.</p>

¹⁵ D.07-01-009 at 5, D.08-04-010 at 5, and Resolution ALJ-235 at 4.

<p>[8] Intervenor Responsibility for Transparency and Accuracy in Compensation Requests</p>	<p>The Commission takes this opportunity to remind all intervenors that they bear the burden of providing accurate, complete, and honest information in all compensation requests. The Commission relies on intervenors' good faith representations, particularly regarding consultant agreements and payments, as it does not have the resources to review every contract or non-standard arrangement in detail.</p> <p>Intervenor compensation is funded by ratepayers, and the Commission takes seriously any effort to mislead or obscure the financial basis for a claim. 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>
<p>Other Comments</p>	<p>The Commission finds the deficiencies in this filing to be concerning and expects a higher standard of transparency and diligence moving forward. The submission was not only missing essential documentation but also contained misleading information regarding consultant terms, missing invoices, and errors throughout. This resulted in inefficient use of the intervenor's own time and an undue burden on Commission staff resources to reconcile these errors. Please be advised that future claims lacking necessary supporting evidence will be assessed solely on the information provided; if the Commission cannot verify portions of the claim, those portions may be denied ensuring the program operates efficiently for all participants.</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))

<p>A. Opposition: Did any party oppose the Claim?</p>	<p>No</p>
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<p>B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?</p>	<p>No</p>
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If not:

Party	Comment	CPUC Discussion

FINDINGS OF FACT

1. Green Power Institute has made a substantial contribution in some aspects to D.22-11-040.
2. The requested hourly rates for Green Power Institute’s representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services, and/or reflect the actual rates billed to, and paid by the intervenor, for consultant services rendered.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work produced.
4. The total of reasonable compensation is \$35,431.25.

CONCLUSION OF LAW

1. The claim, with the adjustments set forth above, satisfies the requirements of Pub. Util. Code §§1801-1812.

ORDER

1. Green Power Institute is awarded \$35,431.25.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall pay Green Power Institute their respective shares of the award, based on their California-jurisdictional electric revenues for the 2022 calendar year, to reflect the year in which the proceeding was primarily litigated. If such data is unavailable, the most recent 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 July 26, 2023, the 75th day after the filing of Green Power Institute’s amended request, and continuing until full payment is made.

3. The comment period for today's decision is not waived.
4. Rulemaking 18-12-006 is closed.

This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D2211040		
Proceeding(s):	R1812006		
Authors:	ALJ Colin Rizzo & ALJ Marcelo Poirier		
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Green Power Institute	January 13, 2023	\$70,721.00 ⁹	\$35,431.25	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
Gregg	Morris	Expert	\$465	2022	\$450.00
Tamlyn	Hunt	Attorney	\$585	2021	\$475.00
Tamlyn	Hunt	Attorney	\$605	2022	\$605.00
Michael	Chiacos	Expert	\$300	2021	N/A
Michael	Chiacos	Expert Error! Bookmark not defined.	\$310	2022	N/A

(END OF APPENDIX)