



PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

FILED

07/08/26

12:15 PM

A2404018

July 8, 2026

**Agenda ID #24364
Ratesetting**

TO PARTIES OF RECORD IN APPLICATION 24-04-018

This is the proposed decision of Administrative Law Judge Minh LeQuang. 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: sgu
Attachment

Decision **PROPOSED DECISION OF ALJ LEQUANG (Mailed 7/8/2026)****BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Application of Green Power Institute for award of intervenor compensation for substantial contributions to Resolution Numbers SPD-15, SPD-20, SPD-24, and SPD-25.

Application 24-04-018
(Filed April 2, 2024¹)

DECISION GRANTING COMPENSATION TO GREEN POWER INSTITUTE FOR SUBSTANTIAL CONTRIBUTION TO RESOLUTIONS SPD-20, SPD-24, AND SPD-25

Intervenor: Green Power Institute	For contribution to Resolutions SPD-15, SPD-20, SPD-24, and SPD-25
Claimed: \$ 97,770 ²	Awarded: \$46,396.60
Assigned Commissioner: Karen Douglas ³	Assigned ALJ: Minh LeQuang ⁴

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	SPD-15, Adopts the Commission's SB 884 Undergrounding Program SPD-20, Ratifying Action of OEIS on PG&E's 2023-2025 Wildfire Mitigation Plan SPD-24, Ratifying Action of OEIS on Liberty's 2023-2025 Wildfire Mitigation Plan SPD-25, Ratifying Action of OEIS on PacifiCorp's 2023-2025 Wildfire Mitigation Plan
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¹ A.24-04-018 was filed on April 2, 2024.

² The correct total request is \$98,275.00. For further clarification see the footnotes in Part III.B.

³ Commissioner Karen Douglas was assigned to this proceeding on May 10, 2024.

⁴ ALJ Minh LeQuang was assigned to this proceeding on May 10, 2024.

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812⁵:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	None	
2. Other specified date for NOI:	None	
3. Date NOI filed:	Concurrent with this Request for Compensation (see Attachment 19).	Since Resolutions (Res.) SPD-15, SPD-20, SPD-24, and SPD-25 are not “formal proceedings,” in which intervenor compensation claims can be filed (see Section 1801.3(a)), GPI, in accordance with our guidelines, ⁶ has initiated the subject application so that the claim pertaining to Res. SPD-15, SPD-20, SPD-24, and SPD-25 can be resolved. The NOI was filed timely as an attachment to the application, consistent with our requirements.
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.22-10-010	Verified
6. Date of ALJ ruling:	May 15, 2023	Verified

⁵ All statutory references are to California Public Utilities Code unless indicated otherwise.

⁶ See the Intervenor Compensation Program Guide at 27.

	Intervenor	CPUC Verification
7. Based on another CPUC determination (specify):	D.23-02-015	D.23-02-015 does not provide a finding of customer status for this proceeding.
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	R.22-10-010
10. Date of ALJ ruling:	November 20, 2020	8/29/2024
11. Based on another CPUC determination (specify):	D.23-02-015	D.24-08-054
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	SPD-25	Verified. Also, Resolutions (Res.) SPD-15, SPD-20, and SPD-24.
14. Date of issuance of Final Order or Decision:	March 22, 2024	Res. SPD-15 was issued on 3/7/2024. Res. SPD-20 was issued on 2/16/2024. Res. SPD-24 and SPD-25 were issued on 3/22/2024.
15. File date of compensation request:	April 1, 2024	4/2/2024
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 GPI Pleadings relevant to this Claim.)	Noted

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>1. Undergrounding – SB 884</p> <p>The GPI made substantial contributions to Resolution SPD-15 by providing detailed analysis and commentary into the issues of use of a multi-year rolling average for assessing compliance, timing of the adoption of PUC and OEIS actions, the use of reasonable and comparable assumptions, and the need to include a mechanism for continued surveillance of the program. The Commission adopted many of our suggestions, and in instances where our positions were not adopted, we made substantial contributions by enriching the record underlying the decision.</p>	<p>Resolution SPD-15</p> <p>GPI made a number of significant contributions to the development of the Commission’s undergrounding program, and supported the decision in Res. SPD-15 to implement the transmission line undergrounding program called for in SB 884. We offered a number of proposals for improvements in the program while endorsing the overall program.</p> <p>Pleadings</p> <p>It is therefore critical to establish a well-defined Program framework that is concrete, yet sufficiently adaptable to change. This includes the ability to adapt to factors including, but not limited to updated risk modeling methodologies, environmental and system inputs, and wildfire risk mitigation technologies and capabilities. [Reply, 1/11/24, pg. 1.]</p> <p>The Undergrounding Program must have a defined mechanism for periodically updating the Phase 1 Plan and Phase 2 Application, accompanied by a stakeholder review and agency approval process. Updates should minimally capture substantive changes to underlying assumptions, inputs, and models. [Reply, 1/11/24, pg. 4.]</p> <p>GPI recommends withdrawing Draft Resolution SPD-15 until the OEIS proposal for 10- year Undergrounding Plans and a method for determining undergrounding benefit is provided for comment. In addition to the justifications provided above, SPD-15 does not go far enough to synchronize the OEIS and CPUC filings and their interactions. GPI appreciates that Phase</p>	<p>GPI does not provide any citations or evidence to show where the Commission adopted any of GPI’s contentions in full or in part for SPD-15. SPD-15 mentions GPI’s only contribution as filing a reply comment. We find that GPI did not substantially contribute to decision-making process of Resolution SPD-15. See Part III.D, Item [3].</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
	<p>3 includes CPUC and OEIS coordination. However, SPD-15 falls well short of achieving true alignment between the OEIS and CPUC roles in the 10-year Undergrounding Program. [Reply, 1/11/24, pg. 13.]</p> <p>The significance of roll-over projects on the average annual unit cost cap will depend on how Undergrounding Projects are defined. For example, whether Projects are defined on a circuit segment, or circuit level granularity will affect the chunkiness of project completion as well as the annual unit cost and CBR average. A more granular definition of Undergrounding Projects, such as the circuit segment level could produce the same or similar annual average unit cost, but with a higher standard deviation that is less affected by Project completion roll-overs into future years on account of more Projects completed each year. [Reply, 1/11/24, pgs. 8-9.]</p> <p>GPI is further concerned that the provision for a one-time approval of a single 10-year Plan sets the stage for approving all downstream costs, since the Plan they are predicated on was independently deemed to substantially increase reliability and reduce wildfire risk largely independent of cost. GPI agrees with CalAdvocates and TURN that the Program’s siloed approach to first reviewing and approving risk reduction impact that is largely divorced from cost, plus the creation of the memorandum account for cost overruns, seems to offer utilities a free pass to increase costs above the original Plan. [Reply, 1/11/24, pg. 15.]</p>	

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>2. Review of 2023-2025 PG&E WMP.</p> <p>The GPI made substantial contributions to Resolution SPD-20 by performing a detailed analysis of PG&E’s 2023-2025 WMP, and providing OEIS and the Commission with the results of our analysis and our recommendations for fixing deficiencies in PG&E’s three-year plan, and in preparation for the coming three-year cycle. OEIS adopted many of our suggestions in responding to PG&E, and in drafting their decision, which SPD-20 ratifies. In instances where our positions were not adopted, we made substantial contributions by enriching the record underlying the decision.</p>	<p>Resolution SPD-20</p> <p>Energy Safety appreciates stakeholder involvement in the WMP evaluation process. The following stakeholder data requests and utility responses were reviewed, used, and cited in this Decision.</p> <p>GREEN POWER INSTITUTE DATA REQUEST:</p> <p>GPI-PGE-2023WMP-022</p> <p>PG&E RESPONSE</p> <p>Date Received: May 11, 2023</p> <p>Date Submitted: May 16, 2023 [SPD-20, pg. A-53.]</p> <p>Energy Safety found the following stakeholder comments to concur with topics already included in Energy Safety’s findings:</p> <p>GPI</p> <ul style="list-style-type: none"> o Accounting for mitigations in PSPS decision-making process. o Hardening decision-making process. [SPD-20, pg. A-57.] <p>The following stakeholder comments introduced new information that influenced Energy Safety’s findings:</p> <p>GPI</p> <ul style="list-style-type: none"> o Informed area for continued improvement on the continuation of effectiveness of enhanced clearances joint study. o PG&E's work order backlog plan must be revised. [SPD-20, pg. A-58.] <p>In addition to the above, Energy Safety’s evaluation of the utilities’</p>	<p>Verified, however the data request is actually GPI-PGE-2023WMP-02.</p> <p>Verified</p> <p>Verified</p> <p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
	<p>2023-2025 WMPs benefited from the discovery materials generated by data requests submitted to PG&E by the some of the stakeholders named above, in particular Green Power Institute (GPI) and Mussey Grade Road Alliance (MGRA), see Appendix D for associated stakeholder data requests. [SPD-20, pg. A-59.]</p> <p>Pleadings</p> <p>The GPI performed a review of PG&E’s 2023-2025 WMP with a general focus on Risk Methodology and Assessment (WMP Section 6), Wildfire Mitigation Strategy Development (WMP Section 7), Wildfire Mitigation (WMP Section 8), and the intersection of these risk management elements, particularly with respect to the electrical distribution system.</p>	<p>Noted, however GPI is required to provide “a citation to the specific portions of documents filed in the proceeding ... reflecting the intervenor’s testimony/arguments.” Intervenor Compensation Program Guide at 20.</p>
<p>3. Review of 2023-2025 Liberty WMP.</p> <p>The GPI made substantial contributions to Resolution SPD-24 by performing an analysis of Liberty’s 2023-2025 WMP, and providing the OEIS with a series of critiques and suggestions for improvements in order to bring the document up to OEIS standards. Res. SPD-24 acknowledges GPI’s contributions, including some that reinforced and broadened the conclusions of the OEIS, and some that added new insights and material that were incorporated into the Resolution.</p>	<p>Resolution SPD-24</p> <p>Energy Safety found the following stakeholder comments to concur with topics already included in Energy Safety’s findings:</p> <ul style="list-style-type: none"> • GPI. <ul style="list-style-type: none"> o Work order Backlog/Halting asset inspections. o SRP analysis. o Mitigation selection. o Mitigation Strategy Development. o Risk Modeling Software Use Cases. o Risk Modeling Development Timeline. o Risk Modeling Maturity Initiatives. o Inspection Scheduling and Planning. 	<p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
	<p>o Develop a plan to eliminate its vegetation management backlog. [Res. SPD-24, pg. A-19.]</p> <p>The following stakeholder comments introduced new information that influenced Energy Safety’s findings:</p> <ul style="list-style-type: none"> • GPI. <p>o Included in RN RN-LU-23-02 to further evaluate covered conductor as an alternative and justify decreased targets. [Res. SPD-24, pg. A-20.]</p> <p>Energy Safety found the following stakeholder comments to concur with topics already included in Energy Safety’s findings:</p> <ul style="list-style-type: none"> • GPI. <p>o Vendor role in risk modeling.</p> <p>o SRP analysis.</p> <p>o Repair back-log timeline.</p> <p>o Progress on expulsion fuse replacements. [Res. SPD-24, pg. A-21.]</p> <p>Pleadings</p> <p>The GPI performed a review of Liberty’s 2023-2025 WMP with a general focus on Risk Methodology and Assessment, Wildfire Mitigation Strategy Development, Wildfire Mitigation, and the intersection of these risk management elements, particularly with respect to the electrical distribution system.</p>	<p>Verified</p> <p>Verified</p> <p>Noted, however GPI is required to provide “a citation to the specific portions of documents filed in the proceeding ... reflecting the intervenor’s testimony/arguments.” Intervenor Compensation Program Guide at 20.</p>
<p>4. Review of 2023-2025 PacifiCorp WMP.</p>	<p>Resolution SPD-25</p> <p>Energy Safety issued a draft Decision approving PacifiCorp’s 2023-2025</p>	<p>Noted</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>The GPI made substantial contributions to Resolution SPD-25 by performing an analysis of PacifiCorp’s 2023-2025 WMP, and providing the OEIS with a series of critiques and suggestions for improvements in order to bring the document up to OEIS standards. Res. SPD-25 acknowledges GPI’s contributions, including some that reinforced and broadened the conclusions of the OEIS, and some that added new insights and material that were incorporated into the Resolution.</p>	<p>WMP on December 28, 2023. GPI provided comments to Energy Safety on January 17, 2024, on Energy Safety’s draft Decision.¹⁵ GPI recommended clarifications to Energy Safety’s Decision that Energy Safety made in the final Decision. [Res. SPD-25, pg. 6.]</p> <p>Energy Safety found the following stakeholder comments to concur with topics already included in Energy Safety’s findings:</p> <ul style="list-style-type: none"> • GPI <ul style="list-style-type: none"> o Target pass rates for vegetation management QA/QC program o PSPS and wildfire risk trade-off transparency o Risk model implementation milestones and dates o Risk-based approach to asset inspections <p>[Res. SPD-25, pg. A-23.]</p> <p>Energy Safety found the following stakeholder comments to concur with topics already included in Energy Safety’s findings:</p> <ul style="list-style-type: none"> • GPI <ul style="list-style-type: none"> o Continued tracking of 2022 areas for continued improvement (e.g., PC-22-06 and PC-22-09) o Level 1 conditions/work orders <p>[Res. SPD-25, pg. A-25.]</p> <p>The following stakeholder comments introduced new information that influenced Energy Safety’s findings:</p> <ul style="list-style-type: none"> • GPI 	<p>Verified</p> <p>Verified</p> <p>Verified</p>

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
	<p>o Level 1 condition remediation delays [Res. SPD-25, pg. A-25.]</p> <p>Pleadings</p> <p>The GPI performed a review of PacifiCorp’s 2023-2025 WMP with a general focus on Risk Methodology and Assessment, Wildfire Mitigation Strategy Development, Wildfire Mitigation, and the intersection of these risk management elements, particularly with respect to the electrical distribution system.</p>	<p>Noted, however GPI is required to provide “a citation to the specific portions of documents filed in the proceeding ... reflecting the intervenor’s testimony/arguments”. Intervenor Compensation Program Guide at 20.</p>

B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor’s Assertion	CPUC Discussion
<p>a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?</p>	<p>Yes</p>	<p>Verified</p>
<p>b. Were there other parties to the proceeding with positions similar to yours?</p>	<p>Yes</p>	<p>Verified</p>
<p>c. If so, provide name of other parties: TURN, Mussey Grade, PAO, the IOUs, and the SMJUs.</p>		<p>Noted</p>
<p>d. Intervenor’s claim of non-duplication: This proceeding covers a wide variety of topics related to the state’s program for wildfire mitigation. The Green Power Institute has been an active participant in the Commission’s RPS and LTPP/IRP proceedings, and a number of related proceedings, including the wildfire mitigation proceeding, R.18-10-007. The Green Power Institute coordinated its efforts in this proceeding with other parties in order to avoid duplication of effort, including participating in the monthly zooms organized by Cal Advocates for parties to coordinate their efforts, 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>		<p>Noted</p>

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

Intervenor’s Comments	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 in the Wildfire Safety Division 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 Resolutions SPD-15, SPD-20, SPD-24, and SPD-25.</p> <p>The hours claimed herein in support of Resolutions SPD-15, SPD-20, SPD-24, and SPD-25 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 this Decision in this case. We note that the hours that went into our evaluation of the 2023-2025 WMPs of the large IOUs, which we reported on in our 5/26/23 Comments (see Attachment 2), and which are intertwined for all three IOUs, have already been claimed in Application A.24-01-022, and are therefore not included in this claim for PG&E. Similarly, the hours that went into our evaluation of the 2023-2025 WMPs of the SMJUs, which we reported on in our 6/29/23 Comments (see Attachment 2), and which are intertwined for all three SMJUs, have already been claimed in Application A.24-01-022, and are therefore not included in this claim for Liberty and PacifiCorp.</p> <p>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 40 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 three 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</p>	<p>After the adjustments made to this claim, the remainder of the claimed costs are reasonable. <i>See Part III.D.</i></p>

Intervenor’s Comments	CPUC Discussion								
<p>provided expert testimony in a variety of regulatory and legislative proceedings, as well as in civil litigation.</p> <p>Dr. Harrold has worked for the Green Power Institute (GPI) for a total of more than 10 years, as a Research Assistant from 2006 to 2008, and again as a Scientist from 2015 to present. Through her work with the GPI she has been engaged with the development of the Renewable Portfolio Standard program (RPS), the Integrated Resources Planning (IRP) proceeding, and the Wildfire Mitigation Plan (WMP) proceeding. Dr. Harrold earned a Ph.D. in geomicrobiology from the University of Washington, Department of Earth and Space Science in 2014.</p> <p>Decision D.98-04-059 states, on pgs. 33-34, “Participation must be productive in the sense that the costs of participation should bear a reasonable relationship to the benefits realized through such participation ... At a minimum, when the benefits are intangible, the customer should present information sufficient to justify a Commission finding that the overall benefits of a customer’s participation will exceed a customer’s costs.” This proceeding is concerned with the development and approval of the wildfire mitigation plans of the wires utilities. The cost reductions and environmental benefits of the WMPs overwhelm the cost of our participation.</p>									
<p>b. Reasonableness of hours claimed:</p> <p>The GPI made Significant Contributions to Resolutions SPD-15, SPD-20, SPD-24, and SPD-25 by actively participating in workshops and working groups, and providing a series of OEIS and 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 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</i> Part III.D.</p>								
<p>c. Allocation of hours by issue:</p> <table border="0" data-bbox="203 1407 933 1543"> <tr> <td>1. Undergrounding – SB 884</td> <td>20%</td> </tr> <tr> <td>2. Review of 2023-2025 PG&E WMP</td> <td>40%</td> </tr> <tr> <td>3. Review of 2023-2025 Liberty WMP</td> <td>20%</td> </tr> <tr> <td>4. Review of 2023-2025 PacifiCorp WMP</td> <td>20%</td> </tr> </table> <p>Note that some of the hours that were devoted to the evaluation of the PG&E WMP were intertwined with our evaluation of the WMPs of the other IOUs and were claimed in A.24-01-022. Similarly, some of the hours that were devoted to the evaluation of the Liberty and PacifiCorp WMPs were intertwined with our evaluation of the WMPs of the SMJUs and were claimed in A.24-01-022. These hours are not being charged in this claim, but they do boost the hours devoted to issue nos. 2 – 4 beyond the hours claimed in this Application, and are included in the allocation of hours by issue shown above. See note above – a. Intervenor’s claim of cost reasonableness.</p>	1. Undergrounding – SB 884	20%	2. Review of 2023-2025 PG&E WMP	40%	3. Review of 2023-2025 Liberty WMP	20%	4. Review of 2023-2025 PacifiCorp WMP	20%	<p>GPI’s timesheets show the following allocations per issue following adjustments described in Part III.D item [6]:</p> <ol style="list-style-type: none"> 1. 30.8%, 2. 41.5%, 3. 15.6%, and 4. 12.1%
1. Undergrounding – SB 884	20%								
2. Review of 2023-2025 PG&E WMP	40%								
3. Review of 2023-2025 Liberty WMP	20%								
4. Review of 2023-2025 PacifiCorp WMP	20%								

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
G. Morris	2023	38.50	485	See comment 1	18,673 ⁷	22.30 [3, 4]	\$460.00 [1]	\$10,258.00
G. Morris	2024	25.00	505	See comment 1	12,625	13.50 [3, 4]	\$475.00 [1]	\$6,412.50
Z. Harrold	2023	119.50	300	See comment 2	35,850	72.40 [3, 4]	\$260.00 [2]	\$18,824.00
Z. Harrold	2024	85.75	310	See comment 2	26,583 ⁸	47.65 [3, 4]	\$260.00 [2]	\$12,389.00
Subtotal: \$93,730						Subtotal 1: \$47,883.50		
						Adjustment: -\$3,624.40 [7]		
						Subtotal 2: \$44,259.10		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
G. Morris	2024	16.00 ⁹	252.5	½ 2024 rate	4,040 ¹⁰	9.00 [5]	\$237.50 [1]	\$2,137.50
Subtotal: \$4,040¹⁰						Subtotal: \$2,137.50		
TOTAL REQUEST: \$97,770¹¹						TOTAL AWARD: \$46,396.60		
<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</p>								

⁷ The correct total for Morris' 2023 fees is \$18,672.50.

⁸ The correct total for Harrold's 2024 fees is \$26,582.50.

⁹ GPI's submitted timesheets reflect 18.00 hours for Morris' 2024 Intervenor Compensation Claim Preparation hours.

¹⁰ The correct Subtotal for GPI's Intervenor Compensation Claim Preparation is \$4,545.00.

¹¹ The correct total request is \$98,275.00.

CLAIMED	CPUC AWARD
<p>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>	

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
Attachment 3	Breakdown of hourly efforts by issue category
Attachments 4-7	Res. SPD-15, Res. SPD-20, Res. SPD-24, and Res. SPD-25
Attachments 8-18	The eleven pleadings listed in Attachment 2
Attachment 19	NOI
Comment 1	The Commission has adopted a 4.46 percent adjustment for rates in the Market Rate Study for converting 2022 rates to 2023 values, and 4.07 percent for converting 2023 rates to 2024 values. These values can be found on the Escalation tab of the Hourly Rate Chart spreadsheet on the Commission’s web site. We apply the 4.46 percent escalator to the approved 2022 hourly rate for Dr. Morris, which is \$465/hr (D.23-11-036), and round to the nearest 5 percent for 2023 per established Commission practice, to produce a rate of \$485/hr. We apply the 4.07 percent escalator to the 2023 hourly rate for Dr. Morris, and round to the nearest 5 percent for 2024 per established Commission practice, to produce a rate of \$505/hr.
Comment 2	Dr. Harrold’s currently approved rate for 2021 is based on the old (pre-2021 Market Rate Study) system. As of the date of this Application she does not yet have an approved rate for 2022, 2023 or 2024. GPI is requesting that for 2022 and following years Dr. Harrold’s rate be converted to a Market Rate Study basis. For 2021, the basis year in the Hourly Rate Chart, Dr. Harrold is qualified as a Level IV Public Policy Analyst (8 years of practice before the Commission plus 4 years credit for a PhD degree), the range in the table is \$263.72-\$493.98. We are asking for a rate for Dr. Harrold that is based on the Hourly Rate Chart’s basis year of 2021 of \$280/hr. Applying the 3.31, 4.46 and 4.07 escalators and rounding to the nearest five each time produces a 2022 rate of \$285/hr, a 2023 rate of \$300/hr, and a 2024 rate of \$310/hr. Those are the rates that we are requesting in this Application.

D. CPUC Comments, Disallowances, and Adjustments

¹² Attachments are not included in the final decision.

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 9, 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, followed by a second payment once the intervenor compensation award is issued.
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] Morris' 2024 Hourly Rate	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

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.

	<p>Associates, working on a contingency basis for the Pacific Institute, meaning that 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 \$460 for 2023 and \$475 for 2024. We apply one-half of Morris' adopted 2024 rate of \$475.00 for an Intervenor Compensation Claim Preparation rate of \$237.50.</p>
<p>[2] Harrold's 2023 and 2024 Hourly Rates</p>	<p>Although GPI continues to identify Harrold as a staff associate of GPI, supplemental information provided confirms that Harrold works as a consultant, 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 Harrold. GPI filed the "Associate Service Agreement Addendum" between Future Resources Associates (Morris) and Harrold under seal, but states that per the terms of the contract, Harrold has been hired on a contingency basis where Harrold receives an initial payment upon invoicing, followed by a second payment contingent upon this intervenor compensation award.</p> <p>Based on these terms, we approve an hourly rate of \$260 for 2023 and 2024.</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 between GPI and Harrold in the initial claim and waited until the Commission requested supplemental documentation, which significantly delayed the processing of this claim.</p>

<p>[3] Lack of Substantial Contribution</p>	<p>Public Utilities Code § 1802(j) states that a substantial contribution “has substantially assisted the commission in the making of its order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer.” 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. We reduce 107.10 hours for the following reasons:</p> <p><u>Resolution SPD-15 (82.90 hours reduced)</u></p> <p>GPI claimed 82.90 hours for its work on Resolution SPD-15. This work included attending workshops, drafting comments, research, internal communications, and reviewing related filings. To receive Intervenor Compensation, GPI is required to show how they substantially contributed to the decision-making process. § 1804(c) and Rule 17.4(a).¹⁴ The Intervenor Compensation Guide (Guide) at page 20 states that in Part II.A intervenors “must support each of your claimed contributions with both a citation to the specific portions of documents filed in the proceeding ... and a citation to the specific portion of the CPUC’s order or decision indicating that the CPUC has adopted in whole or in part your contentions or recommendations.”</p> <p>GPI failed to cite anywhere that Resolution SPD-15 adopted their contentions in full or in part as required by §§ 1802(j), 1803(a), and 1804(c) and the Guide. Instead, GPI merely references back to its own comments which does not establish that those comments were considered, adopted, or relied upon, either in whole or in part.</p> <p>The Commission gave GPI the benefit of the doubt by reviewing the Resolution and found that GPI was only mentioned once to reference the fact that they filed reply comments on Draft Resolution SPD-15. The</p>
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¹⁴ All rule references are to California Code of Regulations Title 20, Division 1, Chapter 1 unless indicated otherwise.

	<p>resolution makes no acknowledgement that those comments were considered, adopted, or relied upon, either in whole or in part. We note that filing comments alone is insufficient for GPI to receive Intervenor Compensation. GPI failed to substantiate how its comments contributed to the decision-making process. Accordingly reduce 82.90 hours GPI claimed relating to their work on Resolution SPD-15, which breaks down as follows.</p> <ul style="list-style-type: none"> • 2023 Harrold: 27.70 hours • 2024 Harrold: 34.80 hours • 2023 Morris: 10.40 hours • 2024 Morris: 10.00 hours <p><u>Comments on PG&E’s 2023 Wildfire Mitigation Plan Final Revision Notice Response (22.00 hours reduced)</u></p> <p>GPI requested 22.00 hours for Harrold’s and Morris’ work on their Comments on PG&E’s 2023 Wildfire Mitigation Plan Final Revision Notice Response that was filed on October 13, 2023. GPI’s claimed work on this document consisted of five timesheet entries for drafting their comments, reviewing PG&E’s Supplemental Revision Notice Response, and filing their comments. GPI fails to mention this document anywhere in this Intervenor Compensation claim or in their list of pleadings in Attachment 2. Therefore, we reduce all 22.00 hours GPI claimed for their work on this Comment for failing to show how it substantially contributed to the decision-making process, which breaks down as follows:</p> <ul style="list-style-type: none"> • 2023 Harrold: 18.00 hours • 2023 Morris: 4.00 hours <p><u>2024 OEIS Wildfire Mitigation Plan Guidelines (2.20 hours reduced)</u></p> <p>GPI claimed two timesheet entries for 2.75 hours on February 11 and 27, 2024, where Harrold reviewed the Office of Energy Infrastructure Security’s (OEIS) 2024 Wildfire Mitigation Plan guidelines. These dates come after GPI’s last filed their comments on every draft decision involved in this Intervenor Compensation claim. There is also no evidence on OEIS’ docket of such a guideline for the 2023-2025 Wildfire Mitigation Plans.¹⁵ Therefore, we reduce the 2.20 hours not relating to SPD-15 from Harrold’s 2024 work on the 2024 OEIS Wildfire Mitigation Plan Guidelines for failing to substantially contribute to the decision-making process.</p>
<p>[4] Internal Duplication</p>	<p>The Commission compensates intervenors for reasonable and efficient participation that contributes to the development of the record and aids in decision-making. However, we find that GPI’s claimed hours reflect a significant duplication of effort. Specifically, multiple representatives</p>

¹⁵ See <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?doctetnumber=2023-2025-WMPs>.

	<p>worked on the same issues and participated in activities where only one representative would have been sufficient, given the relative simplicity or limited scope of the issues involved.</p> <p>Both Morris and Harrold requested time for the following meetings:</p> <ul style="list-style-type: none"> • 2/24/23 Undergrounding Workshop • 12/7/23 Monthly Wildfire Stakeholder Call • 12/13/23 Monthly RMWG Call • 1/4/24 Call with each other • 1/4/24 Monthly Wildfire Stakeholder Call • 1/18/24 Call with each other • 2/1/24 Monthly Stakeholder Call <p>This level of staffing resulted in unnecessary, redundant, and inefficient participation that did not provide added value to the proceeding. Accordingly, we find that the involvement of multiple representatives in these instances was not justified and resulted in excessive hours. As a result, we reduce the claim by 5.80 hours to ensure that only reasonable and non-duplicative efforts are compensated.</p> <ul style="list-style-type: none"> • 2023 Harrold: 1.40 hours • 2024 Harrold: 1.10 hours • 2023 Morris: 1.80 hours • 2024 Morris: 1.50 hours
<p>[5] Morris' 2024 Intervenor Compensation Claim Preparation</p>	<p>GPI claimed 18.00 hours for preparation of the intervenor compensation request, which is excessive given the scope of issues and overall scale of the request.</p> <p>GPI's submitted Intervenor Compensation claim included several errors and missing information that the Commission had to rectify, which included:</p> <ul style="list-style-type: none"> • In Part II.A.2-4, not providing "a citation to the specific portions of documents filed in the proceeding ... reflecting the intervenor's testimony/arguments" as required by the Intervenor Compensation Program Guide at 20; • In Part II.A.2, providing an incorrect data request label; • In Part III.B, entering multiple incorrect numbers; and • In the submitted timesheet, labeling the following entries with the "2. Review of 2023 PG&E WMP Update" issue despite the descriptions clearly belonging to the "3. Review of 2023 Liberty WMP Update" issue: <ul style="list-style-type: none"> ○ June 8, 2023: "Review the 2023-2025 Liberty Utility WMP" ○ October 20, 2023: "Draft comments on Liberty response to Revision Notices" ○ October 23, 2023: "Draft and file comments on Liberty response to Revision Notices"

	<p>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>Morris also has significant experience practicing before the Commission and preparing similar claims, and we would expect greater efficiency in compiling this request. Additionally, GPI did not provide a rationale explaining why this particular claim—smaller in scale than some of their previous submissions—required this level of effort. Accordingly, we reduce the claimed hours by 9.00 hours, or 50%, awarding 9.00 hours for claim preparation.</p>
<p>[6] 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>[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</p>

	<p>consultant.¹⁶ 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 consultants' 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 the 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 \$3,624.40 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 Addendums. Because the Associate Service Agreement Addendum between Future Resources Associates and the consultant was filed under seal, we do not disclose here how the reductions are specifically calculated.</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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¹⁶ D.07-01-009 at 5, D.08-04-010 at 5, and Resolution ALJ-235 at 4.

B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	No
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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 SPD-20, SPD-24, and SPD-25.
2. Green Power Institute did not made a substantial contribution to SPD-15.
3. 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.
4. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
5. The total of reasonable compensation is \$46,396.60.

CONCLUSION OF LAW

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

ORDER

1. Green Power Institute is awarded \$46,396.60.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company shall pay Green Power Institute \$25,798.12, their respective share of the award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning June 16, 2024, the 75th day after the filing of Green Power Institute’s request, and continuing until full payment is made.
3. Within 30 days of the effective date of this decision, Liberty Utilities shall pay Green Power Institute \$11,920.76, their respective share of the award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial

commercial paper as reported in Federal Reserve Statistical Release H.15, beginning June 16, 2024, the 75th day after the filing of Green Power Institute's request, and continuing until full payment is made.

4. Within 30 days of the effective date of this decision, PacifiCorp shall pay Green Power Institute \$8,677.72, their respective share of the award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning June 16, 2024, the 75th day after the filing of Green Power Institute's request, and continuing until full payment is made.
5. The comment period for today's decision is not waived.
6. Application (A.) 24-04-018 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):	Resolutions SPD-20, SPD-24, and SPD-25		
Proceeding(s):	A2404018		
Author:	ALJ LeQuang		
Payer(s):	Pacific Gas and Electric Company, Liberty Utilities, and PacifiCorp		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Green Power Institute	Apr. 1, 2024	\$97,770 ¹⁷	\$46,396.60	N/A	See Part III.D CPUC Comments, Disallowances, and Adjustments section above.

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Gregg	Morris	Expert	485	2023	\$460.00
Gregg	Morris	Expert	505	2024	\$475.00
Zoë	Harrold	Scientist	300	2023	\$260.00
Zoë	Harrold	Scientist	310	2024	\$260.00

(END OF APPENDIX)

¹⁷ The correct total request is \$98,275.00. For further clarification see the footnotes in Part III.B.