STATE OF CALIFORNIA GAVIN NEWSOM, Governor

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

FILED
07/08/26
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R1909009

July 8, 2026

Agenda ID #24363
Ratesetting

TO PARTIES OF RECORD IN RULEMAKING 19-09-009:

This is the proposed decision of Administrative Law Judge Debbie Chiv. 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 CHIV (Mailed 7/8/2026)**

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Microgrids Pursuant to Senate Bill 1339 and Resiliency Strategies.	Rulemaking 19-09-009 (Filed September 12, 2019)

DECISION DENYING COMPENSATION TO GREEN POWER INSTITUTE FOR LACK OF SUBSTANTIAL CONTRIBUTION TO DECISION 24-11-004

Intervenor: Green Power Institute	**For contribution to Decision D.24-11-004**
Claimed: $ 216,313	**Awarded:** $0.00
Assigned Commissioner: Karen Douglas[1]	**Assigned ALJ:** Debbie Chiv[2]

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.24-11-004 Adopts implementation rules for multi-property microgrid tariffs and other matters.

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812[3]:

	Intervenor	**CPUC Verification**
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	December 17, 2019	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	December 31, 2019	Verified
4. Was the NOI timely filed?		Yes

[1] This proceeding was reassigned to Commissioner Karen Douglas on March 30, 2026.
[2] This proceeding was reassigned to ALJ Debbie Chiv on July 25, 2025.
[3] All statutory references are to California Public Utilities Code unless indicated otherwise.

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
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.22-10-010 (see note below)	Verified
10. Date of ALJ ruling:	May 15, 2023	Verified
11. Based on another CPUC determination (specify):	D.24-08-054	The Administrative Law Judge's Ruling on GPI's showing of significant financial hardship issued on May 15, 2023, in R.22-10-010 required GPI to provide additional information to support its statements of significant financial hardship. On June 22, 2023, GPI filed a supplement to their NOI in accordance with the May 15, 2023 ALJ Ruling. D.24-08-054 awarded compensation to GPI in R.22-10-010 and established a finding of significant financial hardship.
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		

13. Identify Final Decision:	D.24-11-004	Verified
14. Date of issuance of Final Order or Decision:	November 18, 2024	Verified
15. File date of compensation request:	January 14, 2025	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
Line 9	The May 15, 2023, ALJ Ruling on GPI's NOI in R.22-10-010 requested additional financial information before making a finding of "significant financial hardship." On June 22, 2023, GPI submitted the requested additional information in our filed Supplement to the NOI. Decision D.24-08-054 made the final determination, finding that GPI had demonstrated significant financial hardship and was eligible to receive intervenor compensation.	The Administrative Law Judge's Ruling on GPI's showing of significant financial hardship issued on May 15, 2023, in R.22-10-010 required GPI to provide additional information to support its statements of significant financial hardship. On June 22, 2023, GPI filed a supplement to their NOI in accordance with the May 15, 2023 ALJ Ruling. D.24-08-054 awarded compensation to GPI in R.22-10-010 and established a finding of significant financial hardship.

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
GPI made substantial contributions to D.24-11-004 through multiple avenues: (1) providing detailed analysis that led to specific modifications in the adopted multi-property microgrid tariff framework, including the removal of the 20MW export cap and strengthened notice requirements; (2) conducting empirical analysis of existing	(Please note that Attachment 2 includes a list of issue areas and GPI Pleadings relevant to this Claim.)	Noted. However, GPI's proposal did not support the Decision. The Decision declined to adopt GPI's recommendation, and GPI does not point to any language in the Decision indicating that its participation constitutes a

microgrid program implementation that informed the Commission's evaluation of proposed tariff structures; (3) developing comprehensive recommendations on tariff standardization across utility territories; (4) offering detailed analysis of environmental and social justice implications; and (5) submitting our own proposal for a multi-property microgrid tariff. While the Commission ultimately adopted a more limited framework than GPI recommended, our extensive analysis helped develop a complete record for evaluating key policy issues including cost allocation, ratepayer protection, and grid safety considerations. We divide our description of GPI's Substantial Contributions to D.24-11-004 into five issue areas: 1. Development of Guiding Principles for Multi-Property Microgrid Tariff 2. Assessment of PG&E's Community Microgrid Enablement Tariff (CMET) Modifications 3. Creation of Multi-Property Tariffs for Statewide Application 4. Environmental and Social Justice (ESJ) Action Plan Alignment		substantial contribution to the Decision. GPI's contribution is not compensable.

5. GPI Multi-Property Microgrid Tariff Proposal Issue nos. 1-4 are the four issues included in the July 18, 2023, amended scoping memo for Track 5. Issue no. 5 was added by a Ruling issued on October 23, 2023.		
1. Guiding Principles for Multi-Property Microgrid Tariffs GPI made substantial contributions to the development of guiding principles in D.24-11-004 by providing detailed analysis of how to implement SB 1339's commercialization mandate while ensuring ratepayer protections and grid safety. Through extensive comments and analyses, GPI helped identify key technical and policy considerations for balancing multiple statutory objectives, including: 1. Analyzing specific operational requirements needed for microgrid viability. 2. Evaluating ratepayer protection mechanisms. 3. Assessing grid safety implications of different operational models. While the Commission ultimately adopted more restrictive parameters than GPI recommended, our analysis was integral to developing a	**Decision D.24-11-004** GPI attempts to avoid the power sale issue of Section 218 by having the IOU purchase electricity from the microgrid so that the microgrid is not actually selling power to end users but rather, the IOU. We reject GPI's proposal because it circumvents and contravenes Section 218 and D.21-01-018. [D.24-11-004, pg. 39.] **Pleadings** We also recommend inclusion of two key additional features to the tariffs: o An option for a combined interconnection study for all microgrid resources connecting through the Point of Common Coupling (PCC), under the rationale that the MG is required and designed to be a single controllable entity and as such any resources that are part of the MG connecting through the same PCC will act as one entity and therefore should be studied as one entity for interconnection purposes. o Without a compensation mechanism included in the tariffs they will almost certainly be ineffective for all but a handful of projects that are able to obtain large grants. With a compensation mechanism, the tariffs may actually help to "commercialize" microgrids, as is the mandate of SB	GPI's claim that it made substantial contributions to the development of guiding principles in D.24-11-004 is not supported by the Commission's findings. While GPI provided analysis and recommendations regarding SB 1339's commercialization mandate, its proposals were ultimately rejected for contravening Section 218 and D.21-01-018. The Commission specifically found that GPI's approach to power sales circumvented statutory requirements, and its recommendations on compensation mechanisms and interconnection studies were not adopted. The decision reflected that the guiding principles

complete record on these complex policy issues and helped inform the Commission's final framework.	1339. We suggest some key features for a compensation component to be included in the pro formas. [Comments 10/27/23, pgs. 2-3.] The limitations the CMET imposes on the operation of a multi-property microgrid ("MPMG") eliminates most of the microgrid's commercial value, and as a result, the CMET will be ineffective in facilitating the deployment of commercially viable MPMGs in the IOU service areas. This is contrary to the requirements of SB 1339, the Commission's Environmental and Social Justice ("ESJ") Action Plan, and other state agency guidance on the need to commercialize microgrids to provide customer benefits and help meet the State's climate and equity goals. In these comments we propose guiding principles for a MPMG tariff that will enable MPMGs to be commercially viable by providing clean energy and resilience benefits to participating customers and by participating as resources in the CAISO and retail markets, while contributing to California's energy and environmental goals and supporting reliable power system operation. [Joint Comments 10/27/23, pgs. 2-3.] It is important to emphasize also that MPMs focused on solar and storage technologies, which are GPI's preferred type of microgrid due to our focus on renewable energy, will need to "over-size" in order to provide reliable power and resilience in a manner worthy of being called resilience. Oversizing means building solar and storage beyond what is needed for most day-to-day use of the MPM. Oversizing requires export compensation because it will, by definition, exceed microgrid customer demand during blue sky	were shaped by statutory constraints rather than GPI's proposals. Therefore, GPI's participation, while acknowledged, did not result in substantial contribution as required for intervenor compensation.

	conditions. [Comments 12/15/23, pg. 2.] The PD also omits consideration of the major potential wildfire mitigation and resilience benefits of a widespread adoption of community microgrids, which have been used by utilities such as PG&E to argue in favor of their own proposed community microgrids in remote areas. [Comments 10/7/24, pg. 3.]	
2. Assessment of Utility Community Microgrid Tariffs GPI made substantial contributions to the assessment of PG&E's CMET program in D.24-11-004 through detailed empirical analysis and discovery requests that directly informed several adopted modifications. GPI obtained and analyzed PG&E data showing that only one project had achieved commercial operation under CMET after 2½ years, with only one other project advancing past initial program stages. This empirical evidence was cited in party comments and helped demonstrate the need for specific tariff modifications. GPI's analysis directly contributed to several adopted changes: 1. The Commission's removal of PG&E's 20MW export cap limitation, explicitly citing GPI's argument that this restriction was 'arbitrary and unnecessary' (D.24-11-004, p.74).	**Decision D.24-11-004** GPI, PearlX, SBUA, and Sunnova argue that a 20MW cap is arbitrary and unnecessary and point to SCE and SDG&E having no similar cap for their respective tariffs. We agree. [D.24-11-004, pg. 74.] GPI recommends that "any such changes shall be noticed at least 60 days in advance and the CMG Aggregator shall be given an opportunity to object, request changes, or otherwise obtain further information about the proposed changes." We find that the IOUs should modify their proposed tariffs to provide the multi-property microgrid owner/operator advanced notice of permanent changes to the microgrid operating agreement being imposed by the IOU, and the microgrid owner/operator should have an opportunity to respond or request more information. Therefore, we modify the tariffs of PG&E, SCE, and SDG&E. [D.24-11-004, pg. 76.] **Pleadings** The proposed tariffs will not work in terms of enabling or commercializing community microgrids, for a variety of reasons discussed herein. Commercialization is required by SB 1339 and by various other state policies.	While GPI participated in the assessment of PG&E's CMET program and provided empirical analysis, its arguments and recommendations were not the sole or primary basis for the Commission's adopted modifications. The removal of PG&E's 20MW export cap, strengthened notice requirements, and standardization efforts were supported by multiple parties, and the decision does not attribute these changes exclusively to GPI. Furthermore, despite GPI's critiques, the Commission upheld the core structure of the utility microgrid tariffs, rejecting GPI's broader recommendations for

2. Adoption of strengthened notice requirements for changes to microgrid operating agreements, incorporating GPI's specific recommendation for advance notice and response opportunities (D.24-11-004, p.76). 3. Requirements for greater standardization across utility tariffs, responding to GPI's detailed comparison highlighting inconsistencies between utility proposals.	As such, GPI recommends that the Commission reject these tariffs in their proposed form, or in the alternative adopt our proposed changes to the tariffs. [Comments 10/27/23, pg. 2.] The PD adopts an essentially anti-empirical approach in approving the utilities' community microgrid tariffs by failing to discuss the three-year track record of PG&E's CMEP/CMET, which is the explicit model for the adopted utility tariffs, and the fact that during that time just one microgrid in PG&E territory has come online, the RCAM project, and that project received ~$6 million in funding from the Energy Commission. Just one other project has made it past stage 1 of PG&E's CMEP. Available data make it clear that the CMEP approach, even in the slightly modified form adopted in the PD, will not work to commercialize microgrids. [Comments 10/7/24, pg. 2.] GPI supports a number of the changes the PD adopts for the utility tariffs, but again advise that these changes do not go nearly far enough to create a tariff that would fulfill SB 1339's mandate to commercialize microgrids. [Comments 10/7/24, pg. 3.]	commercialization. Therefore, while GPI contributed to the record, its participation did not constitute a substantial contribution as required for intervenor compensation.
3. Creation of Multi-Property Tariffs for Statewide Application GPI made substantial contributions to the development of unified multi-property tariff requirements through detailed analysis of utility proposals and specific recommendations for harmonization in D.24-11-004. GPI's comments were the first to identify that the Joint IOUs	**Decision D.24-11-004** In conclusion, the new compensation mechanisms, pricing, and valuation proposals by GPI, MRC, PearlX, and Sunnova avoid the Commission's statutory duty to regulate rates and prohibit cost shifting to non-participating customers. [D.24-11-004, pg. 51.] **Pleadings** The Joint IOUs appear to have failed to follow the directions in the scoping	While GPI participated in the review of multi-property microgrid tariffs and identified inconsistencies among utility proposals, its recommendations were not the primary basis for the Commission's final decision. The Commission did not

had submitted disparate proposals rather than the single pro forma tariff required by the ALJ ruling. This analysis led to specific improvements in the final decision: 1. Consistent cost and timelines for Microgrid Islanding Study. 2. Standardization of notice requirements across utilities for permanent changes to microgrid operating agreements. 3. Harmonization of timelines for review periods and application processing. 4. Consistent treatment of registration requirements for data portal access. While the Commission did not adopt all of GPI's proposed modifications, our systematic comparison of utility and party proposals and identification of inconsistencies directly informed the standardization requirements in the final decision. Regarding islanding studies, GPI identified that SCE's tariff provided specific timelines (90 business days) and cost estimates ($75,000) for completing the MIS, while PG&E and SDG&E's proposals lacked such clarity. We argued this uncertainty created unnecessary barriers for microgrid developers. The Commission agreed, directing all utilities to individually file Tier 2 Advice Letters within	memo and ALJ ruling regarding submitting a single "pro forma" tariff. Instead, they have each submitted different proposed tariffs with different names. GPI requests that the Commission reject these separate tariffs and require the IOUs to re-submit a single pro forma tariff, and that each of the utilities use the same name for their tariff once implemented. [Comments 10/27/23, pg. 2.] It is imperative that the Commission adopt a tariff that allows MPMs to operate in blue sky mode as well as islanded mode, and SB 1339 is clear that this was the intent of the Legislature; without being to operate as a single controllable entity in blue sky mode the economics of MPMs simply don't pencil. [Comments 1/25/24, pg. 2.] It is equally important that the Commission provide a new and predictable compensation mechanism in a new MPMT, without cost shifting, for the many reasons described by GPI and other parties. [Comments 1/25/24, pg. 2.] The PD, moreover, dismisses all third-party tariff proposals and in some cases, including with GPI's proposed tariff, ignores significant aspects of those proposals. For example, GPI's proposed compensation mechanism had two equally important components: 1) an internal sales mechanism; and 2) an export sales mechanism, based on a "resilience avoided cost" modification of existing PURPA tariffs, which is by definition not cost shifting because it would expressly only provide compensation for grid services from microgrid exported power. [Comments 10/7/24, pg. 2.]	adopt GPI's key proposals, including its request for a single pro forma tariff, and explicitly rejected its compensation mechanisms, pricing, and valuation due to concerns about regulatory compliance and cost shifting. While some standardization measures were adopted, these were supported by multiple parties and driven by the Commission's broader regulatory objectives. Therefore, GPI's participation, while noted, does not meet the standard for substantial contribution required for intervenor compensation.

two years updating their multi-property microgrid tariffs to include estimated timelines and costs for completing the MIS. This requirement will provide much-needed transparency and predictability for microgrid developers navigating the interconnection process. The Commission also adopted specific language requiring timely completion of the MIS, incorporating GPI's recommendations for clear timelines and process improvements.		
4. Environmental and Social Justice (ESJ) Action Plan Alignment GPI made substantial contributions to the consideration of environmental and social justice implications in D.24-11-004 through comprehensive analysis of how different tariff structures could advance ESJ Action Plan goals. The Decision specifically acknowledges GPI's analysis of ESJ implications (D.24-11-004, p.55), and engages with our arguments regarding ratepayer protections and oversight requirements (pp.61-62). While the Commission ultimately determined that additional oversight was needed to ensure ESJ benefits, GPI's detailed analysis of each ESJ Action Plan goal helped develop a complete record on equity considerations and	**Decision D.24-11-004** GPI states that its tariff proposal fulfills the Commission's ESJ Action Plan. GPI states that its tariff proposals align with all the Commission's ESJ Action Plan and Goals. [D.24-11-004, pg. 55.] Cal Advocates argues that MRC, Sunnova, PearlX, and GPI suggest their proposals support the Commission's ESJ Action Plan, particularly, ESJ Goal 2 on claims that third-party control of microgrid services and rates will facilitate financial viability of microgrids and increase the investment of clean energy resources in disadvantaged communities. [D.24-11-004, pg. 61.] **Pleadings** GPI is in full agreement with the objectives and stated goals in the ESJ Action Plan 2.0. In short summary, our tariff proposal is fully aligned with the nine ESJ Action Plan 2.0 goals, and furthers many of these goals, while some are not impacted by GPI's proposal. We describe each goal and	While GPI provided an analysis of how its tariff proposal aligned with the Commission's Environmental and Social Justice (ESJ) Action Plan, the Commission ultimately did not adopt GPI's recommendations. The decision explicitly found that additional oversight was necessary to ensure ESJ benefits and did not accept GPI's claims that its proposal sufficiently addressed ratepayer protections for disadvantaged communities. GPI's recommendations were not incorporated into the final decision, and did not

informed the Commission's final framework for evaluating ESJ impacts. Our analysis highlighted, in particular: 1. The intersection between microgrid deployment and community resilience needs. 2. Ratepayer protection considerations for disadvantaged communities. 3. The importance of transparent metrics for tracking ESJ outcomes.	how our tariff proposal impacts these goals in what follows. The goal language is reproduced in full in italics, with GPI responses after each goal. [Comments 1/25/24, pg. 2.]	meet the threshold for substantial contribution required for intervenor compensation.
5. GPI Multi-Property Microgrid Tariff Proposals GPI made substantial contributions to D.24-11-004 by developing and submitting a detailed alternative tariff framework, with two key compensation components, both defined in a manner that expressly avoided cost shifting, that helped develop a complete record on key policy issues the Commission needed to address. While the Commission ultimately did not adopt GPI's specific proposals, our detailed analysis of compensation mechanisms and ratepayer impacts helped frame critical policy questions requiring Commission resolution. The Decision extensively engages with GPI's proposal, demonstrating its importance in developing the record:	**Decision D.24-11-004** GPI Proposal: GPI proposes a framework that focuses on compensation. GPI proposes two compensation mechanisms for microgrids: (1) an internal microgrid sales option where the utility buys power from the microgrid and sells it back to microgrid customers; and (2) for microgrid power during blue sky conditions in excess of microgrid customer demand, an export sales option based on a resilience avoided cost under the Public Utility Regulatory Policies Act. [D.24-11-004, pg. 16.] GPI and MRC's compensation mechanisms would result in unfair cost shifts between ratepayers. Cal Advocates also points out that GPI's proposal "creates a risk that [community microgrid] Aggregators would receive extraneous or inapplicable compensation for capacity, energy, or grid services provided to the grid, which would be inconsistent with just and reasonable rates and prohibitions on cost-shifting." [D.24-11-004, pg. 48.]	While GPI's proposal contributed to the discussion by providing a detailed alternative tariff framework, the Commission ultimately rejected its approach due to statutory noncompliance and concerns over cost shifting. The decision explicitly found that GPI's proposed compensation mechanisms would result in unfair cost shifts and did not align with statutory requirements under Sections 451 and 454. While the GPI's proposal was not adopted, and therefore, GPI did not make a substantial contribution to the

1. The Decision provides detailed analysis of GPI's proposed two-part compensation structure (D.24-11-004, p.16), using it as a key example for examining ratepayer protection requirements. 2. The Commission's analysis of cost-shifting concerns directly responds to GPI's detailed arguments regarding avoided costs and ratepayer benefits (D.24-11-004, p.48), helping develop the record on these critical issues. 3. The Decision's examination of Section 218 requirements extensively analyzes GPI's proposed framework for utility power purchases (D.24-11-004, p.101), contributing to the Commission's final determination of statutory requirements. GPI's proposal particularly advanced the record by: 1. Providing detailed analysis of how renewable energy-focused microgrids could support grid resilience. 2. Developing specific metrics for evaluating ratepayer impacts. 3. Offering concrete suggestions for balancing commercial viability with consumer protection. While Finding of Fact 27 and Conclusion of Law 4 ultimately rejected aspects of	Finding of Fact no. 27. GPI’s proposed framework attempts to avoid the power sale issue of Section 218 by having the IOU purchase electricity from the microgrid so that the microgrid is not actually selling power to end users but rather, the IOU. [D.24-11-004, pg. 101.] Conclusion of Law no. 4. GPI’s proposal should not be adopted because Sections 451 and 454 confer substantial and non-delegable responsibility in the Commission to ensure the justness and reasonableness of rates for ratepayers. [D.24-11-004, pg. 109.] **Pleadings** GPI’s proposals seek to commercialize microgrids as commonly-occurring “donkeys” rather than the highly unusual “unicorns” that require large amounts of grant funding. To date, California’s community microgrids have been unicorns, but we need donkeys. [Comments 12/15/25, pg. 2.] GPI proposes two key compensation mechanisms to incentivize and commercialize microgrids: 1) an internal microgrid sales option similar to PG&E’s Green Savers program where the utility buys power from the microgrid and sells it back to microgrid customers, thus avoiding issues with PUC section 218; 2) for microgrid power during blue sky conditions in excess of microgrid customer demand an export sales option based on a new “resilience avoided cost” under the PURPA framework. [Comments 12/15/25, pg. 2.]	final decision as required for intervenor compensation.

GPI's approach, our comprehensive analysis helped ensure a complete record on these complex policy issues and directly informed the Commission's final legal and policy determinations.		

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

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocates 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, Vote Solar, the Climate Center, Tesla, CESA, Clean Coalition, and the three large electric IOUs.		Verified
d. Intervenor's claim of non-duplication: This proceeding covers a variety of topics related to the microgrid development program in California. The Green Power Institute has been an active participant in the Commission's RPS and LTPP/IRP proceedings, and a number of other proceedings related to renewable energy, and is continuing these efforts in the present proceeding (R.19-09-009). 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. We held numerous individual calls and conference calls with fellow parties regarding various issues that were under consideration over the past couple of years in this proceeding. 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.		Noted

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
a. Intervenor's claim of cost reasonableness:	As GPI failed to demonstrate a substantial

GPI is providing, in Attachment 2, a listing of all of the pleadings that we provided in this Proceeding 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.24-11-004. The hours claimed herein in support of Decision D.24-11-004 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. 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. 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. 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 provided expert testimony in a variety of regulatory and legislative proceedings, as well as in civil litigation. Mr. Hunt is a renewable energy law and policy expert with substantial experience in California, in local energy planning and in state energy-policy 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,	contribution to D.24-11-004 we find all associated costs to be unreasonable. *See* Part III.D CPUC Comments, Disallowances and Adjustments.

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. Mr. White is an expert on emissions, air quality and energy issues. He has worked on these topics for over 25 years. For the past twelve years, Mr. White has been primarily engaged on policy matters related to transmission, distribution, and electric generation resources, and the intersection of the electric sector with climate, environmental, and equity issues. Prior to consulting for Sierra Club, Mr. White worked at the Clean Coalition as Director of Policy and Economic Analysis, where he developed regulatory and legislative analysis and proposals across a dozen states and an equal number of municipal utility jurisdictions, with a primary focus on California regulatory issues. Additionally, Mr. White has been the lead analyst for several U.S. Department of Energy, New York State Energy Research and Development Authority and the California Energy Commission Electric Program Investment Charge studies. Mr. White has a Bachelor of Science from the University of Michigan, two years of graduate level social studies of science and technology at the Massachusetts Institute of Technology, and an additional two years in Environmental Science at San Jose State University. 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 of microgrids in California, and the readying of the grid to accommodate that development. The cost reductions and environmental benefits of microgrids powered by renewable energy overwhelm the cost of our participation.	
b. Reasonableness of hours claimed: The GPI made Significant Contributions to Decision D.24-11-004 by providing a variety of filings on the topics under consideration, participated in meetings and workshops, and filed comments and replies on the PD. Attachment 3 provides a detailed breakdown of the hours that	We deny all hours for failure to demonstrate a substantial contribution to D.24-

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.	11-004. *See* Part III.D CPUC Comments, Disallowances and Adjustments.
c. Allocation of hours by issue: 1. Guiding Principles for Multi-Property Microgrid Tariffs 10% 2. Assessment of Utility Community Microgrid Tariffs 35% 3. Creation of Multi-Property Tariffs for Statewide Application 20% 4. Environmental and Social Justice (ESJ) Action Plan Alignment 5% 5. GPI Multi-Property Microgrid Tariff Proposals 30%	Noted

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	5.50	485	D.24-04-036	2,668	0.00 [1]	N/A [2]	$0.00
G. Morris	2024	12.50	505	See comment 1	6,313	0.00 [1]	N/A [2]	$0.00
T. Hunt	2023	138.50	630	D.24-04-036	87,255	0.00 [1]	N/A [2]	$0.00
T. Hunt	2024	140.75	695	See comment 2	97,821	0.00 [1]	N/A [2]	$0.00
S. White	2023	21.75	595	See comment 3	12,941	0.00 [1]	N/A [2]	$0.00
S. White	2024	5.25	620	See comment 3	3,255	0.00 [1]	N/A [2]	$0.00
Subtotal: $210,253						***Subtotal: $0.00***		
INTERVENOR COMPENSATION CLAIM PREPARATION **								

Item	Year	Hours	Rate $	Basis for Rate*	Total $	Hours	Rate	Total $
G. Morris	2024	24.00[4]	252.5	½ 2024 rate	6,060	0.00 [1]	N/A [2]	$0.00
					Subtotal: $6,060			***Subtotal: $0.00***
					TOTAL REQUEST: $216,313			***TOTAL AWARD: $0.00***

*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. Intervenor's 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[5]	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Tamlyn Hunt	November 2001[6]	218673	No

C. Attachments Documenting Specific Claim and Comments on Part III:[7]

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
Attachment 4	Resume for Sahm White
Comment 1	The Commission has adopted a 4.07 percent adjustment for rates in the Market Rate Study for converting the 2023 to 2024 values. This value can be found on the Escalation tab of the Hourly Rate Chart spreadsheet on the

[4] Per GPI's time records, Morris spent a total of 32 hours on Intervenor Compensation Claim Preparation between 2024 and 2025 (8 hours in 2024 and 24 hours in 2025).

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

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

[7] Attachments are not included in the final decision.

	Commission's web site. We apply the 4.07 percent escalator to the approved 2023 hourly rate for Dr. Morris, which is $485/hr (D.24-04-036), and round to the nearest 5 percent for 2024 per established Commission practice, to produce a rate of $505/hr.
Comment 2	Mr. Hunt had his status upgraded in 2024 to GPI Legal Director. The level V range in the Commission's Hourly Rate Chart for this category for 2024 is $616-971/hr, with a median value of $794/hr. We are requesting a 2024 rate for Mr. Hunt as GPI Legal Director of $695/hr.
Comment 3	Mr. White qualifies as a Level V Public Policy Analyst. The level V range in the Commission's Hourly Rate Chart for this category for 2023 is $544-920/hr, with a median value of $702/hr. We are requesting a 2023 rate for Mr. White of $595/hr, which is consistent with our recent claim (December 20, 2024) in R.21-06-017. For Mr. White's 2024 rate we apply the 4.07 percent escalator from the Commission's Hourly Rate Chart for 2024 and round to the nearest 5 per regular Commission practice, which produces a 2024 rate of $620/hr. Mr. White's resume is included as Attachment 4 to this claim.

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 24, 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.[8] (However, the Commission notes that this fictious business name expired in 2018).

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

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] Lack of Substantial Contribution	A 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 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." *See* Intervenor Compensation Program Guide at 17 and Pub. Util. Code § 1802(j). As noted in Part II and Part III Section A of this claim, we conclude that GPI did not substantially contribute to D.24-11-004. We reduce all of GPI's hours for failure to make a substantial contribution to D.24-11-004 as outlined in Pub. Util. Code § 1802(j), and therefore, this claim is denied in its entirety.
[2] Hourly Rates	Because we reduce all the hours requested, we do not reach the issue of the reasonableness of the requested hourly rates.
Other Comments	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.

PART IV: OPPOSITIONS AND COMMENTS

Within 30 days after service of this Claim, Commission Staff or any other party may file a response to the Claim (*see* § 1804(c))

A. Opposition: Did any party oppose the Claim?	No
B. Comment Period: Was the 30-day comment period waived (*see* Rule 14.6(c)(6))?	No

If not:

Party	Comment	CPUC Discussion

FINDINGS OF FACT

1. Green Power Institute has not made a substantial contribution to D.24-11-004 as described herein.

2. The total of reasonable compensation is $0.00.

CONCLUSION OF LAW

1. The Claim fails to satisfy all requirements of Pub. Util. Code §§ 1801-1812.

2. The Claim should be denied.

ORDER

1. The intervenor compensation claim of Green Power Institute for contributions to D.24-11-004 is denied.

2. The comment period for today's decision is not waived.

3. This decision is effective today.

4. Rulemaking 19-09-009 is closed.

Dated _____________, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		**Modifies Decision?**	No
Contribution Decision(s):	D2411004		
Proceeding(s):	R1909009		
Author:	ALJ Debbie Chiv		
Payer(s):	N/A		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Green Power Institute	Jan. 14, 2025	$216,313	$0.00	N/A	*See* CPUC Comments, Disallowances, and Adjustments section.

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	N/A[9]
Gregg	Morris	Expert	505	2024	N/A[9]
Tamlyn	Hunt	Attorney	630	2023	N/A[9]
Tamlyn	Hunt	Attorney	695	2024	N/A[9]
Sahm	White	Expert	595	2023	N/A[9]
Sahm	White	Expert	620	2024	N/A[9]

(END OF APPENDIX)

[9] *See* Part III.D.2.