



FORM A: BLANK NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION

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

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Order Instituting Rulemaking on California Advanced
Electric Rate DesignRulemaking 26-04-009
(Filed April 9, 2026)

R2604009

NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION

NOTE: AFTER ELECTRONICALLY FILING A PDF COPY OF THIS NOTICE OF INTENT, PLEASE EMAIL THE DOCUMENT IN AN MS WORD FORMAT TO THE INTERVENOR COMPENSATION PROGRAM COORDINATOR AT Icompcoordinator@cpuc.ca.gov.

Customer or Eligible Local Government Entity (party intending to claim intervenor compensation): Utility Consumers' Action Network

Assigned Commissioner: John Reynolds**Administrative Law Judge:** Joanna Perez-Green

I hereby certify that the information I have set forth in Parts I, II, III and IV of this Notice of Intent is true to my best knowledge, information and belief.

Signature: /s/ Jane Krikorian

Date: July 17, 2026

Printed Name: Jane Krikorian

PART I: PROCEDURAL ISSUES**(To be completed by the party intending to claim intervenor compensation)**

A. Status as "customer" (see Pub. Util. Code § 1802(b)) ¹ The party claims "customer" status because the party is (check one):	Applies (check)
1. A Category 1 customer is an actual customer whose self-interest in the proceeding arises primarily from his/her role as a customer of the utility and, at the same time, the customer must represent the broader interests of at least some other customers. See, for example, D.08-07-019 at 5-10).	☐
2. A Category 2 customer is a representative who has been authorized by actual customers to represent them. Category 2 involves a more formal arrangement where a customer or a group of customers selects a more skilled person to represent the customer's views in a proceeding. A customer or group of customers may also form or authorize a group to represent them, and the group,	☐

¹ All statutory references are to California Public Utilities Code unless indicated otherwise.

in turn, may authorize a representative such as an attorney to represent the group.	
3. A Category 3 customer is a formally organized group authorized, by its articles of incorporation or bylaws to represent the interests of residential customers or small commercial customers receiving bundled electric service from an electrical corporation (§1802(b)(1)(C)). Certain environmental groups that represent residential customers with concerns for the environment may also qualify as Category 3 customers, even if the above requirement is not specifically met in the articles or bylaws. <i>See</i> D.98-04-059, footnote at 30.	☑
4. The party’s detailed explanation of the selected customer category. <u>The party’s explanation of its status as a Category 1 customer.</u> A party seeking status as a Category 1 customer must describe the party’s own interest in the proceeding and show how the customer’s participation goes beyond just his/her own self-interest and will benefit other customers. Supporting documents must include a copy of the utility’s bill. <u>The party’s explanation of its status as a Category 2 customer.</u> A party seeking status as a Category 2 customer must identify the residential customer(s) being represented and provide authorization from at least one customer. <u>The party’s explanation of its status as a Category 3 customer.</u> If the party represents residential and small commercial customers receiving bundled electric service from an electrical corporation, it must include in the Notice of Intent either the percentage of group members that are residential ratepayers or the percentage of the members who are receiving bundled electric service from an electrical corporation. Supporting documentation for this customer category must include current copies of the articles of incorporation or bylaws. If current copies of the articles and bylaws have already been filed with the Commission, only a specific reference (the proceeding’s docket number and the date of filing) to such filings needs to be made. <u>Explanation for UCAN’s status as a Category 3 customer:</u> UCAN is a 501(c) (3) non-profit public benefit corporation dedicated to protecting and representing the interests of residential and small business customers in San Diego County. UCAN has a forty-two year history of intervening in CPUC proceedings on behalf of ratepayers. UCAN’s work also includes helping individuals resolve consumer disputes with utility service providers of electricity, gas, water and telecommunications. UCAN has approximately 10,000 members listed in our membership database, of which approximately 98% are residential customers. In D.98-04-059, the Commission directed intervenors to state in their NOIs which of three customer “categories” they fall within. UCAN is a “group or organization	

authorized pursuant to its articles of incorporation or bylaws to represent the interests of residential ratepayers.” The decision also requires a group such as UCAN to include in their NOI a copy of the authorization in their articles of incorporation to represent residential customers, or to provide a reference to a previous filing (see D.98-04-059, p. 30). UCAN has previously provided to the Commission the relevant portion of our articles of incorporation. An ALJ Ruling filed on June 28, 2005, in A.05-02-019 noted that UCAN is a customer as that term is defined in §1802(b) and is a group or organization authorized by its bylaws or articles of incorporation to represent the interests of residential and small commercial customers (See Ruling, pp. 1-2). UCAN most recently included a copy of our articles of incorporation in a NOI filed in A.17-01-019 on April 3, 2017, (see Attachment 2 of that NOI filing) later consolidated under A.17-01-012. The articles of incorporation have not changed since the time of those earlier submissions.	
Do you have any direct economic interest in outcomes of the proceeding? ² If “Yes”, explain:	☐ Yes ☒ No
B. Conflict of Interest (§ 1802.3)	Check
1. Is the customer a representative of a group representing the interests of small commercial customers who receive bundled electric service from an electrical corporation?	☐ Yes ☒ No
2. If the answer to the above question is “Yes”, does the customer have a conflict arising from prior representation before the Commission?	☐ Yes ☐ No
C. Status as an Eligible Local Government Entity (§§1802(d), 1802.4, 1803.1)	
The party claims “eligible local government entity” status because the party is a city, county, or city and county that is not a publicly owned public utility that intervenes or participates in a Commission proceeding for the purpose of protecting the health and safety of the residents within the entity’s jurisdiction following a catastrophic material loss suffered by its residents either in significant damage to infrastructure or loss of life and property, or both, as a direct result of public utility infrastructure.	☐ Yes ☒ No
<u>The party’s explanation of its status as an eligible local government entity</u> must include a description of (1) The relevant triggering catastrophic event; (2) The impacts of the triggering catastrophic event on the residents within the entity’s jurisdiction as a result of public utility infrastructure; and (3) The entity’s reason(s) to participate in this proceeding.	

² See Rule 17.1(f).

D. Timely Filing of Notice of Intent to Claim Intervenor Compensation (NOI) (§ 1804(a)(1)):	
1. Is the party's NOI filed within 30 days after a Prehearing Conference? Date of Prehearing Conference: 6/18/2026	☒ Yes ☐ No
2. Is the party's NOI filed at another time (for example, because no Prehearing Conference was held, the proceeding will take less than 30 days, the schedule did not reasonably allow parties to identify issues within the timeframe normally permitted, or new issues have emerged)?	☐ Yes ☒ No
2a. The party's description of the reasons for filing its NOI at this other time:	
2b. The party's information on the proceeding number, date, and decision number for any Commission decision, Commissioner ruling, Administrative Law Judge's ruling, or other document authorizing the filing of NOI at that other time:	

PART II: SCOPE OF ANTICIPATED PARTICIPATION
(To be completed by the party intending to claim intervenor compensation)

A. Planned Participation (§ 1804(a)(2)(A)):
The party's statement of the issues on which it plans to participate: UCAN represents the interests of residential and small business ratepayers within the San Diego Gas & Electric (SDG&E) territory, advocating for safe and reliable electricity at affordable rates. This Rulemaking was opened to establish advanced electric rate design policies and update residential and non-residential rate structures, examining their underlying cost inputs to better align rates with the cost of providing electricity service. These new policies will also update rate structures to send price signals to customers that could optimize their demand based on actual costs and grid conditions. UCAN supports these types of rates that help customers use electricity when it is cheaper thus using grid assets more efficiently. In doing so, customers could also defer unnecessary and costly grid upgrades, thereby helping to drive down system costs and address ongoing affordability concerns. In this proceeding, UCAN plans to examine: • Whether existing time-of-use rates align with current system load patterns and/or grid cost drivers; • Whether existing rates accurately reflect cost-of-service; • Whether marginal cost inputs and methodologies should be modified to better reflect cost-of-service; • Whether certain charges should be classified as fixed costs; • Whether baseline tiers in time-of-use rates should be modified; • Whether demand charges are outdated and unnecessary; • Whether additional rate design requirements are needed for dynamic rates; • Whether the Commission should adopt funding for third-party consultant services to support the development of rate design and bill impact analysis tools.

The party's explanation of how it plans to avoid duplication of effort with other parties:

UCAN intends to work with other intervenors to coordinate efforts and avoid duplication where possible. UCAN intends to present material that is either unique or that compliments and supports the showing of other parties.

The party's description of the nature and extent of the party's planned participation in this proceeding (to the extent that it is possible to describe on the date this NOI is filed).

UCAN filed comments on the OIR and attended the prehearing conference. UCAN intends to fully participate in the proceeding including working with an expert or two to address the issues described above. UCAN plans to participate in all phases, tracks, attend workshops to provide feedback both formal and informal, and comment on any Energy Division Staff Proposals. UCAN will also submit responses to any ALJ Rulings as well as comment on any proposed decisions.

B. The party's itemized estimate of the compensation that the party expects to request, based on the anticipated duration of the proceeding (§ 1804(a)(2)(A)):

Item	Hours	Rate \$	Total \$	#
ATTORNEY, EXPERT, AND ADVOCATE FEES				
Jane Krikorian - Attorney	150	\$520	\$78,000	
Samuel Golding - Expert	175	\$385	\$67,375	
TBD - Expert	100	\$385	\$38,500	
Courtney Cook-Sloan - Paralegal	25	\$225	\$5,625	
<i>Subtotal: \$189,500</i>				
OTHER FEES				
<i>Subtotal: \$</i>				
COSTS				
<i>Subtotal: \$</i>				
TOTAL ESTIMATE: \$189,500				

Estimated Budget by Issues:

Issue:	Time:	Budget:
1) Rates and Cost of Service	35%	\$66,325
2) Fixed Costs	10%	\$18,950
3) Modifying Baseline Tiers	10%	\$18,950
4) Demand Charges	15%	\$28,425
5) Requirements for Dynamic Rates	20%	\$37,900
6) 3 rd -Party Consultant	10%	\$18,950
Total:	100%	\$189,500

When entering items, type over bracketed text; add additional rows to table as necessary. Estimate may (but does not need to) include estimated Claim preparation time. Claim preparation time is typically compensated at ½ professional hourly rate.

PART III: SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP
(To be completed by party intending to claim intervenor compensation;
see Instructions for options for providing this information)

A. The party claims that participation or intervention in this proceeding without an award of fees or costs imposes a significant financial hardship, on the following basis:	Applies (check)
1. The customer cannot afford, without undue hardship, to pay the costs of effective participation, including advocate's fees, expert witness fees, and other reasonable costs of participation. (§ 1802(h))	☐
2. In the case of a group or organization, the economic interest of the Individual members of the group or organization is small in comparison to the costs of effective participation in the proceeding. (§ 1802(h))	☐
3. The eligible local government entities' participation or intervention without an award of fees or costs imposes a significant financial hardship. (§ 1803.1(b).)	☐
4. A § 1802(h) or § 1803.1(b) finding of significant financial hardship in another proceeding, made within one year prior to the commencement of this proceeding, created a rebuttable presumption in this proceeding (§ 1804(b)(1)). Commission's finding of significant financial hardship made in proceeding number: R.23-12-008; Order Instituting Rulemaking Regarding Transportation Electrification Policy and Infrastructure Date of Administrative Law Judge's Ruling (or CPUC Decision) in which the finding of significant financial hardship was made: June 18, 2025	☒
B. The party's explanation of the factual basis for its claim of "significant financial hardship" (§ 1802(h) or § 1803.1(b)) (necessary documentation, if warranted, is attached to the NOI:	

**PART IV: ATTACHMENTS DOCUMENTING SPECIFIC
ASSERTIONS MADE IN THIS NOTICE**

**(The party intending to claim intervenor compensation identifies and attaches documents;
add rows as necessary)**

Attachment No.	Description
1	Certificate of Service

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ADMINISTRATIVE LAW JUDGE RULING³
(Administrative Law Judge completes)

	Check all that apply
1. The Notice of Intent (NOI) is rejected for the following reasons:	☐
a. The NOI has not demonstrated the party's status as a "customer" or an "eligible local government entity" for the following reason(s):	☐
b. The NOI has not demonstrated that the NOI was timely filed (Part I(B)) for the following reason(s):	☐
c. The NOI has not adequately described the scope of anticipated participation (Part II, above) for the following reason(s):	☐
2. The NOI has demonstrated significant financial hardship for the reasons set forth in Part III of the NOI (above).	☐
3. The NOI has not demonstrated significant financial hardship for the following reason(s):	☐
4. The Administrative Law Judge provides the following additional guidance (see § 1804(b)(2)):	☐

IT IS RULED that:

1. The Notice of Intent is rejected.	☐
2. The customer or eligible local government entity has satisfied the eligibility requirements of Pub. Util. Code § 1804(a).	☐
3. The customer or eligible local government entity has shown significant financial hardship.	☐
4. The customer or eligible local government entity is preliminarily determined to be eligible for intervenor compensation in this proceeding. However, a finding of significant financial hardship in no way ensures compensation.	☐
5. Additional guidance is provided to the customer or eligible local government entity as set forth above.	☐

³ A Ruling needs not be issued unless: (a) the NOI is deficient; (b) the Administrative Law Judge desires to address specific issues raised by the NOI (to point out similar positions, areas of potential duplication in showings, unrealistic expectations for compensation, or other matters that may affect the customer or eligible local government entity's Intervenor Compensation Claim); or (c) the NOI has included a claim of "significant financial hardship" that requires a finding under § 1802(h).

Dated _____, at San Francisco, California.

Administrative Law Judge