STATE OF CALIFORNIA GAVIN NEWSOM

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

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07/28/26
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R1807005

July 28, 2026

Agenda ID #24403
Quasi-Legislative

TO PARTIES OF RECORD IN RULEMAKING 18-07-005:

This is the proposed decision of Commissioner Darcie L. Houck. 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 September 3, 2026, Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties to the proceeding may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure. Electronic copies of comments should also be sent to the Intervenor Compensation Program at: **Icompcoordinator@cpuc.ca.gov.**

/s/ MICHELLE COOKE
Michelle Cooke
Chief Administrative Law Judge

MLC: asf
Attachment

Decision **PROPOSED DECISION OF COMMISSIONER HOUCK (Mailed 7/28/2026)**

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Consider New Approaches to Disconnections and Reconnections to Improve Energy Access and Contain Costs.	Rulemaking 18-07-005 (Filed July 20, 2018)[1]

DECISION GRANTING COMPENSATION TO CENTER FOR ACCESSIBLE TECHNOLOGY FOR SUBSTANTIAL CONTRIBUTION TO DECISIONS (D.) 24-11-005 AND D.25-06-012

Intervenor: Center for Accessible Technology	**For contribution to Decisions (D.) 24-11-005 and D.25-06-012**
Claimed: $60,401.00	**Awarded:** $37,410.51
Assigned Commissioner: Darcie L. Houck	**Assigned ALJ:** Andrew Dugowson

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.24-11-005 (the Disconnection Cap Decision) is an interim decision that directs Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and Southern California Gas Company to extend the residential disconnection rate caps established in Decision 20-06-003 and in place at the time of the decision until the date a final decision on this matter is issued. While it states that a final decision will be issued no later than July 1, 2025, no subsequent decision has yet been issued. D.25-06-012 (the Phase 2 Decision) addresses the requirements of Senate Bill 1142 (2024, Menjivar) and

[1] The correct file date is July 12, 2018.

	directs the California-jurisdictional energy utilities to develop proposals to reduce disconnections in areas that experience extreme heat events. Additional activity in the proceeding during the time covered by this compensation request includes work addressed in a number of advice letters, including implementation of the previously-authorized CBO Pilot; development of the Medical Baseline Study; work on IOU budget billing structures; and ongoing work addressing the IOUs' AMP and PIPP programs. As described below, CforAT's request includes time spent on budget billing and development of the Medical Baseline Study, and CforAT reserves the right to seek compensation for other issues at a later date.

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812[2]:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	8/15/2018	Verified
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	9/14/2018	9/13/2018
4. Was the NOI timely filed?		Yes

[2] All statutory references are to California Public Utilities Code unless indicated otherwise.

	Intervenor	CPUC Verification
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:	See below	D.21-07-025 granted CforAT compensation in this proceeding. Per Rules of Practice and Procedure (Rules) 17.2, parties found eligible in one phase of a proceeding remain eligible in later phases, including any rehearing, in the same proceeding.
6. Date of ALJ ruling:	See below	D.21-07-025 granted CforAT compensation in this proceeding. Per Rule 17.2, parties found eligible in one phase of a proceeding remain eligible in later phases, including any rehearing, in the same proceeding.
7. Based on another CPUC determination (specify):	CforAT has previously been found to be eligible for compensation and has been awarded compensation in this proceeding. *See* D.21-07-025, D.23-06-052, and D.24-10-028.	Verified
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes

	Intervenor	CPUC Verification
Showing of "significant financial hardship" (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	See below	D.21-07-025 granted CforAT compensation in this proceeding. Per Rule 17.2, parties found eligible in one phase of a proceeding remain eligible in later phases, including any rehearing, in the same proceeding.
10. Date of ALJ ruling:	See below	D.21-07-025 granted CforAT compensation in this proceeding. Per Rule 17.2, parties found eligible in one phase of a proceeding remain eligible in later phases, including any rehearing, in the same proceeding.
11. Based on another CPUC determination (specify):	CforAT has previously been found to be eligible for compensation and has been awarded compensation in this proceeding. *See* D.21-07-025, D.23-06-052, and D.24-10-028.	Verified
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.25-06-012	Verified
14. Date of issuance of Final Order or Decision:	6/17/2025	Verified

	Intervenor	CPUC Verification
15. File date of compensation request:	8/18/2025. See comment below	Verified. *See* Rule 1.15, “Computation of Time”.
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Intervenor’s Comment(s)	CPUC Discussion
	“A party found eligible for an award of compensation in one phase of a proceeding remains eligible in later phases, including any rehearing, in the same proceeding.” Commission Rules of Practice and Procedure, Rule 17.2	Verified
	The Phase 2 Decision was issued on 6/17. Compensation requests are generally due 60 days after a decision is issued, which would have been Saturday, 8/16. Rule 1.15 of the Commission’s Rules of Practice and Procedure addresses calculation of time when a deadline falls on a weekend or holiday, and extends the deadline to Monday, 8/18. *See* Rule 1.15 of the Commission’s Rules of Practice and Procedure)	Verified. Rule 1.15, “Computation of Time,” states that when a Commission decision, rule, order, or ruling sets a time limit for performance of an act, the time is computed by excluding the first day (i.e., the day of the act or event from which the designated time begins to run) and including the last day. If the last day falls on a Saturday, Sunday, holiday or other day when the Commission offices are closed, the time limit is extended to include the first day thereafter. If an act occurs after 5:00 p.m., it is deemed as having been performed on the next day.

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
Disconnection Caps: Disconnection caps were first established for the large IOUs in this proceeding through D.20-06-003, with an	**Disconnection Cap Decision (D.24-11-005):** The Commission declined to remove or increase the disconnection rate caps despite the recommendations of the	Verified

expiration date set for the end of 2024. The Commission sought comment on whether to extend or modify the disconnection rate caps and ordered production of data from the IOUs about the impact of caps on uncollectables and arrearages. CforAT's input on this issue included joint comments with other consumer advocates on the initial ruling advocating for maintaining or lowering the existing caps and urging more collection of data, including a study, on the impacts of the disconnection rate caps. Relevant filings include: • Joint Comments on the Administrative Law Judge's Ruling on Disconnection Caps and Past-Due Payment Allocation (with TURN and NCLC), filed April 19, 2024. • Joint Reply Comments on the Administrative Law Judge's Ruling on Disconnection Caps (with TURN and NCLC), filed October 4, 2024. • Joint Reply Comments on Proposed Decision (with TURN and NCLC), filed October 21, 2024. CforAT, NCLC, and TURN recommended that the	IOUs to do so, and instead took the interim action recommended by consumer advocates, including CforAT, to leave the caps in place. Disconnection Cap Decision at p. 7, Ordering Paragraph 1. While the Commission did not directly order a study as requested by the consumer advocates, it found that additional data and further record development is needed before it can make a final decision. Disconnection Cap Decision at p. 8, Ordering Paragraph 2. This determination is informed by the input of the consumer advocates. By providing information allowing the Commission to effectively consider an issue, an intervenor makes a substantial contribution sufficient to support an award of compensation. Consistent with the recommendations of CforAT and the other consumer	

Commission maintain disconnection rate caps and set a uniform disconnection rate cap at 2%. CforAT, NCLC, and TURN also recommended that the Commission undertake a comprehensive review of factors related to disconnection for considering further modifications to disconnection rate caps. Joint Comments on the Administrative Law Judge's Ruling on Disconnection Caps and Past-Due Payment Allocation at pp. 1-6, cited in Disconnection Cap Decision at pp. 3-4 ("These parties advocate for maintaining the current disconnection rate caps or to lower the current caps. Advocates for continuing disconnections rate caps assert that protections are necessary to address an acute and growing affordability crisis that will likely drive an increase in the number of customers in arrears and at risk of losing access to utility service.")	advocates, the Commission determined that the existing disconnection rate caps should be maintained while the Commission further develops the record and obtains more information to inform a future decision regarding whether disconnection rate caps should be extended and/or modified. Disconnection Caps Decision at p. 5.	
CforAT, NCLC, and TURN argued against the IOUs' unsupported recommendations to increase or eliminate disconnection caps. CforAT, NCLC, and TURN recommended that the Commission undertake a comprehensive review of disconnection-related factors to determine the impact of disconnection rate caps on	The Commission considered and acknowledged parties' disagreements on how and whether to address residential rate caps. Consistent with CforAT, NCLC, and TURN's recommendations, "[t]he Commission agree[d] that these [disconnection-related] factors should be considered and that more information is needed." To this end, the Commission stated its intentions to further develop the record and obtain more data before making a future	

arrearages. Joint Reply Comments on the Administrative Law Judge's Ruling on Disconnection Caps at pp. 1-4. CforAT, NCLC, and TURN recommended that the"[t]he Commission should extend the current disconnection caps for the duration of time required for a comprehensive study and evaluation to take place, and should only take further action on the basis of such a study and evaluation." Joint Reply Comments on Proposed Decision at pp. 1-3, cited in Disconnection Caps Decision at p. 6 ("CforAT, NCLC, and TURN also support extending the disconnection caps and encourage the Commission to undertake a detailed study of disconnections and not take action until the study is complete.")	decision on disconnection rate caps beyond the interim decision. This plan is consistent with CforAT, NCLC, and TURN's recommendation for a "comprehensive review" of disconnection-related factors that involves stakeholder input. Disconnection Caps Decision at pp. 4-5. Consistent with recommendations of CforAT and the other consumer advocates, the Commission found that additional information is needed regarding potential modification to the disconnection caps and ordered that the current disconnection caps be extended. Based on comments on the Proposed Decision, including those of CforAT, NCLC, and TURN, the Commission stated that "[it] may develop an additional record in the future on the commenters' recommendations but does not change the decision on those issues." Disconnection Caps Decision at pp. 5-6.	
SB 1142 and Extreme Heat Protections: Background On August 14, 2024, TURN filed an Emergency Motion to Modify Weather-Related Disconnection Protections to Better Address "Extreme Heat" Health and Safety Risks (TURN Emergency Motion). CforAT and NCLC filed a joint response in support of the TURN Emergency Motion. On October 14, 2024, the Assigned Commissioner issued	**Phase 2 Decision re: SB 1142 and Extreme Heat Protections (D.25-06-012)** Specific contributions are discussed in detail below, but the Phase 2 Decision overall provides increased consumer protections, consistent with the recommendations of CforAT and the other consumer advocates. Consistent with CforAT, NCLC, and TURN's recommendations to support reconnection of customers, the Commission determined that the Large	Verified

a ruling, denying the TURN Emergency Motion on procedural grounds but seeking comment on whether the issues raised should be added to the scope. CforAT and NCLC filed comments in support of adding these issues to the scope. On September 25, 2024, Governor Newsom signed into law SB 1142, which requires electric and gas companies to restore service to a disconnected customer who agrees to certain payment plans. SB 1142 requires the Commission to determine whether to set certain requirements for the utilities in order to implement the statute. The Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling added into the scope disconnection protections under extreme weather conditions and implementation of SB 1142. CforAT's input on this issue included joint comments with other consumer advocates and presenting at a workshop, advocating for assistance for disconnected customers and for disconnection protections during extreme heat conditions. Relevant filings include: • Joint Response in Support of TURN Emergency Motion (filed with NCLC), filed August 28, 2024	IOUs and SMJUs must: (1) restore service to first time disconnected customers with no conditions, other than enrollment in a payment plan; and (2) within a three month period following the first reconnection, reconnect a disconnected customer and allow them to maintain their payment plan, provided they pay the balance accrued or an agreed-upon amount. Phase 2 Decision at pp. 51-52 OP 1. Consistent with CforAT, NCLC, and TURN's recommendations for additional, more detailed disconnection reporting from the utilities, the Commission determined that the utilities must include additional information in their monthly disconnection reports. Phase 2 Decision at pp. 20-21, 52 OP 2. While the Commission did not adopt any new disconnection restrictions related to heat risk, it recognized the need for additional work to adjust temperature thresholds triggering disconnection suspensions and directed the Large IOUs to develop proposals with stakeholders including CforAT and to file them via a Tier 3 Advice Letter. The Commission directed SMJUs to subsequently file a Tier 3 Advice Letter, adopting the Large IOUs proposal or presenting a modified or alternative proposal. Phase 2 Decision at pp. 52, OP 4, 5. This determination is consistent with CforAT, NCLC, and TURN's recommendations for detailed analysis of these issues and protections to address the health risks of disconnection during extreme weather.	

• Joint Comments in Response to Ruling on TURN Emergency Motion (filed with NCLC), filed October 22, 2024 • Joint Opening Comments on Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling (filed with NCLC and TURN), filed November 22, 2024 • Reply Comments on Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling (filed with NCLC and TURN), filed January 31, 2025 • Joint Opening Comments on Proposed Decision (filed with NCLC and TURN), filed May 29, 2025 • Joint Reply Comments on Proposed Decision (filed with NCLC and TURN), filed June 03, 2025		
Payment Plan Options for Reconnected Customers: CforAT, NCLC, and TURN (Joint Consumers) recommended that the Commission require IOUs to offer the full spectrum of payment plans, to ensure that	**Payment Plan Options for Reconnected Customers pp. 6-7** While the Commission did not adopt specific requirements for which payment plans must be offered or which processes IOUs must use to inform customers, it nevertheless considered CforAT, NCLC, and TURN's	Verified

customers are enrolled in all discount and support programs they qualify for, and to engage in education, enrollment assistance, and reporting to promote use of payment plans and reduce disconnections. Joint Consumers recommended that requirements should apply equally to Large IOUs and SMJUs, as customers of all utilities experience harms and risks of disconnections. Joint Opening Comments on Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling at pp. 1-3, cited in Phase 2 Decision at pp. 6-7.	recommendations in its decision-making and decided that its determination is applicable to both the Large IOUs and SMJUs, consistent with CforAT, NCLC, and TURN's recommendations that proposed requirements should apply to all utilities. Phase 2 Decision at p. 7 ("This decision does not mandate the Large IOUs to implement specific payment programs. SB 1142 requires the utilities reconnect customers who enter into a payment plan, but does not dictate which types of plans must be offered. Accordingly, the Large IOUs may continue using their existing processes to inform customers of available options and determine which payment plan is best for them. This determination applies to both the Large IOUs and SMJUs.")	
Disconnection Conditions: CforAT, NCLC, and TURN (Joint Consumers) acknowledged that disconnection is permitted once a reconnected customer fails to comply with a payment plan but emphasized that utilities should first screen for health risks before disconnecting customers, should adhere with all existing requirements including clear and proper notice, should facilitate reconnection with payment caps, and should proactively educate and assist customers to avoid disconnections. Joint Opening Comments Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling at pp. 4-6,	**Disconnection Conditions Pursuant to PU Code Section 779.6(a) pp. 7-8** While the Commission did not adopt CforAT, NCLC, and TURN's recommendations regarding payment caps and assistance to reconnected customers, this discussion informed the Commission's inquiry of conditions for disconnection and potential additional assistance and protections for reconnected customers. Phase 2 Decision at p. 8 ("This decision does not change the existing conditions under which the Large IOUs may disconnect customers. SB 1142 does not require the Commission to provide additional disconnection protections to customers that are reconnected pursuant to the statute, and no party proposed such measures. This determination applies both to the Large IOUs and SMJUs.")	Verified

cited in Phase 2 Decision at p. 8. **Reconnection Conditions:** CforAT, NCLC, and TURN emphasized the essential nature of access to energy service, particularly for vulnerable populations, and recommended reconnection policies that recognize this vital resource, provide accommodation to customers with uncertain finances, and promote the opportunity for customers to restore service. Joint Consumers interpreted SB 1142 as requiring utilities to reconnect again customers who agree to a new payment plan because a "second-chance payment arrangement follows best practices" and recognizes the reality of customers' uncertain finances. Joint Consumers emphasized that "[r]econnection policies should prioritize humanity and fairness" and allow customers the opportunity to pay debts and restore service that is vital to health and safety, particularly for vulnerable populations. Joint Opening Comments on Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling at pp. 7-9, cited in Phase 2 Decision at p. 9.	**Reconnection Conditions Pursuant to PUC Section 779.6(a) pp. 9-12** Consistent with CforAT, NCLC, and TURN's recommendations for supporting reconnections, the Commission requires the Large IOUs to reconnect first-time customers without any conditions beyond enrolling in a payment plan and to reconnect a customer and allow them to maintain their payment plan for a customer who is disconnected for three months following the first reconnection, provided they pay an accrued balance or agreed-upon amount. Phase 2 Decision at pp. 10-11. Consistent with CforAT, NCLC, and TURN's recognition of the Consistent with CforAT, NCLC, and TURN's emphasis on customer needs, payment caps, and the essential nature of energy service, the Commission determines that the Large IOUs should set reconnection requirements that consider financial feasibility and the vital need for energy service. Phase 2 Decision at p. 12 ("The Large IOUs should set those requirements at a level that acknowledges the essential need of energy service and that customers with accrued arrearages may have accumulated them due to circumstances that have since changed. Accordingly, the Large IOUs should aim to set reconnection requirements that balance two goals: they should be high enough to mitigate the risk of cost-shifting to customers who are current on their payments, but low enough to remain financially feasible.")	Verified

	While the Commission does not adopt Joint Consumers' same interpretation of the statute, it considers this input in its decision-making and the implications of requiring infinite reconnections to articulate the balance it must strike in adopting reconnection requirements consistent with the statute. Phase 2 Decision at p. 11 ("If the Commission were to require utilities to allow customers to reconnect an infinite number of times without requiring a down payment (or some other demonstration of ability and intent to pay), disconnections would no longer serve any purpose. The issue of nonpayment also impacts other customers that are current on their bills, many of whom do not qualify for CARE or FERA but also struggle to make ends meet. Arrearages may continue to grow, driving customers deeper into debt and increasing the financial burden on non-participating customers, many of whom struggle to pay their monthly electric bills. At the same time, the clear intent of the statute is to mitigate the impact of disconnections and offer customers additional opportunities to pay down their debt. The Commission must balance providing opportunities for customers that have been disconnected or are at risk of disconnection with the potential for increased financial burdens falling on ratepayers who are current with their monthly bills.") Moreover, in its balancing, the Commission recognizes the importance of "providing opportunities for customers that have been disconnected or are at risk of disconnected," consistent with CforAT, NCLC, and TURN's recommendations for supporting reconnections. Phase 2 Decision at p. 11.	

Reconnection Timeline: CforAT, NCLC, and TURN stated that exceptions to the reconnection timeline should be permitted for scenarios that endanger health and safety and that the Commission should establish transparent criteria and reporting requirements for relevant data. Joint Consumers recommended that these rules should apply to both Large IOUs and SMJUs. Joint Consumers recommended that the Commission require utilities to promptly notify customers through all available communication channels when reconnection is not possible within the required timeframe and that documentation of reconnection outside of the specified timeframe be included in monthly disconnection reports. Joint Consumers recommended that the Commission impose penalties on utilities that fail to reconnect service within the required timeframe for reasons that are not specified exceptions and that the Consumer Affairs Branch should oversee complaints and compliance related to reconnection delays. Joint Opening Comments on Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling at pp. 10-11, cited in Phase 2 Decision at pp. 16-17.	**Reconnection Timelines pp. 15-17** Consistent with CforAT, NCLC, and TURN's recommendations regarding health and safety exceptions and documentation of instances falling outside of the required timelines, the Commission adopted a multi-part definition of exceptions to the timeline and required Large IOUs to report compliance metrics. In accordance with CforAT, NCLC, and TURN's recommendations for compliance measures to address untimely reconnections, the Commission stated "[i]f compliance levels are unreasonably low or begin a negative trend, Commission staff or intervenors may call for an investigation of the cause." Phase 2 Decision at p. 17.	Verified Verified

Notifications and Reporting: Joint Consumers recommended that the Commission require utilities to promptly notify customers through all available communication channels when reconnection is not possible within the required timeframe and that documentation of reconnection outside of the specified timeframe be included in monthly disconnection reports. Joint Consumers recommended that the Commission impose penalties on utilities that fail to reconnect service within the required timeframe for reasons that are not specified exceptions and that the Consumer Affairs Branch should oversee complaints and compliance related to reconnection delays. Joint Opening Comments on Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling at pp. 10-11, cited in Phase 2 Decision at pp. 19-20 ("TURN, CforAT, and NCLC ask the Commission to require utilities to document every instance where a reconnection does not occur within the specified timeframe. This should include the duration of the delay, cause of the delay, location of the customer, and a monthly count of all such incidents. The utilities should include this information in their monthly disconnection reports. CAB should receive and investigate complaints and be granted	**Reporting Requirements and Procedures pp. 19-22** Consistent with CforAT, NCLC, and TURN's recommendations, the Commission requires additional, more detailed reporting from utilities that are performing poorly or underperforming, including the specific narrative reporting suggested by Joint Consumers. The Commission also specified that staff may refer noncompliance issues to the Consumer Protection and Enforcement Division for investigation, just as Joint Consumers recommended that noncompliance should be escalated for investigation. Phase 2 Decision at p. 21 ("If after the initial monthly report the data shows, or after several reports the data shows a trend, that a utility has objectively poor performance or underperforms its peers, the utility will be required to provide more detailed reporting, including the type of narrative reporting requested by Cal Advocates and TURN, CforAT, and NCLC. If poor performance or under performance continues, Energy Division staff may refer to the matter to the Commission's Consumer Protection and Enforcement Division for investigation.") Consistent with CforAT, NCLC, and TURN's recommendation for customer notifications and for investigation of customer complaints, the Commission requires that whenever utilities notify customers of reconnection, they must also notify them of the required timelines and of the customer's ability to submit a complaint to the Commission if the utility does not meet the required timeline. Phase 2 Decision at pp. 21-22 ("Furthermore, the Commission requires that whenever any utility (i.e., both the Large IOUs and SMJUs) informs a customer that they will be reconnected, the utility must also	

authority to enforce compliance.")	inform the customer that the law obligates the utility to restore service within a certain amount of time, unless safety or weather issues make that impossible. The utility should further inform the customer that, should the utility not meet this requirement, the customer may submit a complaint to the Commission. At the customer's request, the utility should provide information on how to submit a complaint in the format of the customer's choice (e.g., via phone, email, or text message), so long as the utility currently communicates with the customer via that medium.")	
Ability to Pay: CforAT, NCLC, and TURN defined ability to pay as "a customer's capacity to pay their utility bill in full and on time each month without sacrificing essential expenses that contribute to the health and well-being of all household members" and recommended that this determination include an individualized and comprehensive assessment of a customer's circumstances, including participation in an assistance program, financial aid received, and experience of financial hardship. Joint Consumers recommended that "[u]tilities should adopt a proactive and equitable approach in addressing financial hardship, balancing operational requirements with their responsibility to support customers during challenging times."	**Definition of "Ability to Pay" pp. 22-26** Consistent with Joint Consumers' analysis that relevant data for ability to pay includes participation in income-qualified programs, the Commission determines that eligibility or enrollment in CARE and FERA is the best current measure of ability to pay. Phase 2 Decision at p. 25. Consistent with Joint Consumers' recommendations for a thorough and comprehensive analysis of ability to pay, the Commission recognizes that "a detailed calculation of a customer's ability to pay is a complex, contentious, and customer-specific analysis that would take into account a wide array of data from disparate sources, most of which is sensitive or confidential." Phase 2 Decision at p. 25. While the Commission determines that CARE/FERA eligibility shall serve as the current proxy for ability to pay, it recognizes the need for a comprehensive analysis of ability to pay, identifies ongoing related work in other forums (such as R.22-07-005 as identified by Joint Consumers) that could inform an updated definition, and states that it may	Verified

Joint Opening Comments Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling at pp. 12-13, cited in Phase 2 Decision at pp. 22-24. Joint Consumers agreed that data such as enrollment in income-qualified programs, past payment history, and energy burden are relevant to determining ability to pay and should be incorporated into individualized discussions between utilities and customers who experience ongoing challenges paying bills. CforAT, NCLC, and TURN stated that the IOUs are authorized to make individualized determinations about payment plans and actions for customers and that these individualized determinations could include factors, such as recent financial events in a household, to inform a utility's actions. Joint Consumers pointed to other ongoing activity by the Commission, including future iterations of the fixed charge in R.22-07-005 that are expected to distinguish moderate-income and high-income households, and recommended that the Commission use any process developed in R.22-07-005 to inform ability to pay. Joint Reply Comments on Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling at pp. 7-8, cited in Phase 2 Decision at pp. 22-24.	revisit this definition. This recognition of the need for comprehensive analysis is consistent with Joint Consumers' recommendations and suggestion to coordinate with related work in R.22-07-005. Phase 2 Decision at pp. 25-26.	Verified

Additional Considerations: CforAT, NCLC, and TURN recommended that customers who are determined to meet a threshold of vulnerability as determined by an individualized determination of ability to pay should be offered an extended payment plan and that customer information collected through this assessment process should be anonymized and evaluated by the Commission to inform the ongoing PIPP pilots. Joint Consumers recommended that customers should be offered capped upfront payments to reconnect service as well as the opportunity to reconnect service with a payment plan and without a down payment, in certain instances. Joint Opening Comments on Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling at p. 14, cited in Phase 2 Decision at p. 26. Joint Consumers reiterated their position that utilities engage in meaningful and individualized discussions with customers facing challenges to pay their bills and identified that utilities do not currently have information on ability to pay for all customers. Joint Consumers recommended that data such as participation in support programs and receipt of financial aid be considered, in conjunction with information developed in other	**Considerations Before Terminating or Reconnecting Service pp. 26-28** While the Commission does not adopt the additional practices as suggested by Joint Consumers, it recognizes that taking into account ability to pay suggests providing financial assistance, in line with Joint Consumers recommendations for payment plans and capped down payments. Consistent with Joint Consumer's emphasis on the need for financial assistance for customers experiencing hardships, the Commission recognizes the potential for addressing customer need for financial assistance "by reviewing and refining its existing payment and assistance programs." Phase 2 Decision at p. 28.	

Commission activity. Joint Consumers recommended that customers with a lack of an ability to pay be offered extended payment plans, as well as the ability to reconnect service with capped down payments or a payment plan agreement in situations of financial hardship. Joint Reply Comments on Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling at p. 10, cited in Phase 2 Decision at p. 26. **Holistic Review:** CforAT, NCLC, and TURN recommended that customers who are determined to meet a threshold of vulnerability as determined by an individualized determination of ability to pay should be offered an extended payment plan and that customer information collected through this assessment process should be anonymized and evaluated by the Commission to inform the ongoing PIPP pilots. Joint Opening Comments on Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling at p. 14, cited in Phase 2 Decision at p. 26. Joint Consumers also recommended that "[t]he IOUs should report on the scope of different requirements adopted for customers, including the number of customers enrolled in various low-income programs, the number of	**Holistic Review of Payment Plans and Customer Assistance Programs p. 30** The Commission noted that "[m]ultiple parties encourage the Commission to conduct a holistic analysis of energy utility payment programs and assistance programs to understand the reasons for their successes and failures, the ways they work together, and to identify ways to refine the programs to their effectiveness as a whole." Phase 2 Decision at p. 30. This included input from Joint Consumers, such as CforAT, NCLC, and TURN's recommendation to collect data from assessments of customer ability to pay for use in evaluation of the PIPP pilots and for the utilities to report on information regarding payment assistance and customer finances.	Verified

customers who have received payment assistance, the number of customers who have previously faced disconnection, and the numbers of customers that self-report circumstances showing financial hardship" and that the Commission should oversee patterns to evaluate utilities' consideration of customers' ability to pay. Joint Reply Comments on Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling at pp. 12-13.		Verified
Payment Caps: CforAT, NCLC, and TURN recommended that the Commission adopt clear caps on the payment amounts that utilities can require from customers at risk of disconnection and customers seeking to reconnect after a service shutoff. Joint Consumers detailed that a standardized approach is necessary to avoid inconsistent and inequitable offering of payment plans or deposit requirements. Joint Opening Comments Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling at pp. 14-15, cited in Phase 2 Decision at p. 28.	**Caps on Payments pp. 28-29** While the Commission does not adopt the caps, it considers CforAT, NCLC, and TURN's input in its inquiry of whether caps should be applied; Joint Consumers' input enables the Commission to engage in informed decision-making and to articulate why it determines that it should not adopt these caps. Phase 2 Decision at p. 29 ("This decision does not impose any additional limits on the amount of money the utilities may collect from a customer before terminating service. Capping the amount a utility can collect prior to disconnection is the counterpart to capping the amount of money the utility may collect for reconnection services. The new reconnection policies imposed in this decision work toward the same goal as placing caps on payments before termination.")	Verified
HeatRisk Index: CforAT, NCLC, and TURN recommended that the	**HeatRisk Index: pp. 31-33** While the Commission does not adopt disconnection protections related to extreme heat, it recognizes the	

Commission expand the current temperature-related disconnection rule to prohibit disconnection when the NWS HeatRisk index for the customer's location is forecast to reach the "Major" (Red/3) risk-level over the next 72 hours. Joint Consumers emphasize the importance of supporting access to essential service during extreme heat, particularly for vulnerable and financially burdened households. Joint Opening Comments on Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling at pp. 19-27, cited in Phase 2 Decision at p. 31. Joint Consumers identify the need for more analysis of how the HeatRisk Index could impact disconnection weather protections. Joint Consumers recommend that the Commission further develop the record by directing the IOUs to analyze the potential impact of the HeatRisk tool and to engage the NOAA HeatRisk team to gather more information about the tool. Joint Reply Comments on Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling at pp. 13-16, cited in Phase 2 Decision at p. 32.	importance of thoughtfully and fully considering developing information, consistent with Joint Consumers' request for a detailed analysis and more developed record, and states that it may revisit this issue. Phase 2 Decision at p. 33 ("The HeatRisk index is still under development and its future is uncertain, so it would be imprudent to use it to guide decision making on an indefinite basis. As new information becomes available the Commission may revisit this issue.")	Verified
Reconnection During Heat Events: CforAT, NCLC, and TURN recommended that the	**Reconnection Requirements During "Major" HeatRisk Events pp. 33-34** While the Commission does not adopt requirements for the IOUs to contact recently disconnected customers and	

Commission adopt a requirement for utilities to contact and reconnect recently-disconnected customers when the HeatRisk Index criteria is met, upon agreement to a payment plan. Joint Consumers emphasize the importance of supporting access to essential service during extreme heat, particularly for vulnerable and financially burdened households. Joint Opening Comments on Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling at pp. 26-29, cited in Phase 2 Decision at p. 31. In reply comments, Joint Consumers requested detailed analysis and for the Commission to further develop the record on these issues. Joint Reply Comments on Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling at pp. 13-16, cited in Phase 2 Decision at p. 32. **Additional Protections:** CforAT, NCLC, and TURN recommended additional analysis and development of the record to determine how use of the HeatRisk Index could inform disconnection protections and suggested that the Commission adopt an interim measure to require disconnection suspensions at the request of local public health departments when the HeatRisk index forecasts a	offer reconnection, Joint Consumers' input on this issue nevertheless meaningfully informed the Commission's inquiry. The Commission states that this decision is consistent with its determination not to impose new disconnection restrictions "at this time"; therefore, Joint Consumers have contributed substantial input to an issue that is developing and that the Commission may revisit at another time. This also accords with Joint Consumer's request for more analysis and development of the record. Phase 2 Decision at p. 34 ("As the Commission has not directed the utilities to impose new disconnection restrictions at this time, it similarly will not impose the requirement to contact recently disconnected customers and offer reconnection.") **Additional Protections during Extreme Heat Risks pp. 34-36** Consistent with Joint Consumers' recommendations for further analysis and for the need to develop an approach for weather-related disconnection measures, the Commission directs the Large IOUs to develop proposals in collaboration with stakeholders to address disconnection suspensions in light of relative heat risks identified in the TURN Emergency Motion and directs the SMJUs to either adopt the	Verified

"Major" (Red/3) risk-level event. Joint Consumers opposed use of an alternative heat index that does not consider regional variation and employs a blanket approach, without considering indoor temperature, relative heat risks, or multi-day forecasts. Joint Reply Comments on Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling at pp. 15, 18-20, cited in Phase 2 Decision at pp. 34-35.	Large IOUs' proposals or present modifications or alternatives. The Commission specifically recognizes that these proposals should collaborate with TURN, CforAT, and NCLC as well as other interested parties. Consistent with Joint Consumers' opposition to a "blanket approach" and identification of variation across locations, the Commission directs the Large IOUs to propose region-specific thresholds. Phase 2 Decision at pp. 35-36.	Verified
Public Participation: Joint Consumers advocated for the Commission to hold Public Participation Hearings for the implementation of SB 1141 to gather input from customers regarding experiences working with utilities on arrearages, impacts of disconnections, and needs regarding individualized assistance and plans. Joint Reply Comments on Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling at pp. 1-2, cited in Phase 2 Decision at p. 36.	**Public Participation Hearings p. 26** The Commission acknowledged its appreciation for CforAT, NCLC, and TURN's "continued focus on the wellbeing and experience of the customers" and stated that it will consider scheduling Public Participation Hearings in this proceeding, consistent with CforAT, NCLC, and TURN's recommendations. Phase 2 Decision at p. 36 ("The Commission appreciates TURN's, CforAT's, and NCLC's continued focus on the wellbeing and experience of the customers. As the Commission considers development or refinement of the way utilities engage with customers, the Commission will consider scheduling one or more Public Participation Hearings in this phase of the proceeding.")	Verified
Proposed Decision: Joint Consumers advocated that the Commission should reject CASMU's request to	**Comments on Proposed Decision** Consistent with CforAT, NCLC, and TURN's argument that CASMU's request for reconnection fees or	

charge reconnection fees or increase the disconnection caps because this proposal goes against the statute's goal to reduce barriers to reconnection. Joint Reply Comments on Proposed Decision at pp. 4-5, cited in Phase 2 Decision at p. 40. Joint Consumers recommended that the Commission clarify that utilities are obligated to consider certain individualized factors impacting ability to pay when evaluating disconnection and reconnection decisions and when developing payment plans. Joint Opening Comments on Proposed Decision at pp. 2-4, cited in Phase 2 Decision at p. 41. Joint Consumers advocated that the ability to pay should include consideration of factors beyond eligibility or enrollment in CARE or FERA to develop a more appropriate understanding of what constitutes ability to pay utility to pay. Joint Opening Comments on Proposed Decision at p. 4, cited in Phase 2 Decision at p. 41.	elimination of disconnection caps, the Commission declined to adopt CASMU's recommendations using the same reasoning as CforAT, NCLC, and TURN. Phase 2 Decision at p. 40 ("CforAT, NCLC, TURN and UCAN oppose CASMU's request, arguing that the request contravenes the intent of SB 1142. The Commission does not adopt SCE's or CASMU's recommendations, as requiring a down payment for the first reconnection is inconsistent with the intent of SB 1142.") While the Commission did not adopt CforAT, NCLC, and TURN's recommendations to make these requirements, these recommendations informed the decision-making and gave the Commission the opportunity to clarify the intent of the decision. Phase 2 Decision at p. 41 ("The Commission does not adopt CforAT, NCLC, and TURN's recommendation, as the intent of this decision is to encourage but not mandate the utilities to take the identified factors into account.") While the Commission did not adopt this recommendation, it considered these suggestions and determined that it constituted reargument. Phase 2 Decision at p. 41 ("The Commission does not adopt this recommendation as it constitutes reargument.")	
To protect customers during the summer of 2025 and until the adoption of further protections, Joint Consumers advocated for interim protections based on the HeatRisk Index.	While the Commission does not require interim measures by Summer 2025, it considered the recommendations raised by CforAT, NCLC, and TURN and affirmed "the growing need for these protections" and declined to make the timeline of implementation follow advice letter approval as suggested by	

Joint Opening Comments on PD at pp. 6-7, cited in Phase 2 Decision at p. 46. Joint Consumers recommended that the Commission reject the utilities' request to record costs and seek recovery of implementation costs, based on unmet criteria for costs recovery through a memorandum account and the lack of justification for these requests outside of GRCs. Joint Reply Comments on Proposed Decision at pp. 1-4, cited in Phase 2 Decision at p. 47.	SCE. Phase 2 Decision at p. 46 ("The Commission does not require the utilities to adopt interim measures for Summer 2025 as there is no evidence such measures could be adopted that quickly. SCE recommends that the timeline for implementation of the extreme weather requirements be made dependent on the Tier 3 Advice Letter approval. The Commission declines to adopt SCE's recommendation, as there is growing need for these protections.") While the Commission allowed utilities to record these costs, it reflects consideration of CforAT, NCLC, and TURN's concerns by stating that the disconnection memorandum accounts "will be subject to future reasonableness review by application" and that "[n]othing in this decision should be interpreted to approve cost recovery at this time." Phase 2 Decision at p. 47.	
Additional Issues: <u>Medical Baseline Study:</u> CforAT worked with the IOUs at their request to provide repeated input and comment on the IOU proposal for a required study to estimate the eligible Medical Baseline population. This included informal comments to drafts posted to energydataweb and direct correspondence with the IOUs, containing work by CforAT's assistive technology specialist to help identify appropriate	<u>Medical Baseline Study:</u> The proposed study plan and the IOUs' Joint Advice Letter submitting the study plan for review reflect CforAT's input, including the proposals for additional devices and equipment. The IOUs specifically commended CforAT's participation, stating that "The study design will benefit from your expertise of the Medical Baseline Program!" *See* email correspondence with CforAT and PG&E (as the IOU Lead on study development) attached to this compensation request, along with the	CforAT worked with the IOUs, at their request, on the Medical Baseline Study and worked with PG&E, at their request, on the Budget Billing Advice Letter. CforAT does not show how their work at the request of the IOUs and PG&E substantially

devices and equipment for consideration in the survey. An effective study will benefit the constituency served by CforAT by allowing the Commission and the IOUs to develop meaningful benchmarks in ongoing efforts to increase enrollment in Medical Baseline. <u>Budget Billing Advice Letter:</u> Upon request by PG&E, CforAT worked with the utility on its development of proposals to modify its budget billing/level payment plan. By participating during the development of the Advice Letter, rather than filing a protest after submission, CforAT efficiently resolved potential issues in the most efficient way possible. This effort will benefit CforAT's constituency, which is disproportionately low-income, by improving the level-payment plan to avoid damaging "true ups" that require unanticipated payments by enrolled customers. <u>Additional ongoing issues</u> CforAT worked with the IOUs and the Commission on additional issues during the time covered in this compensation request, including work to implement the previously-approved CBO Pilots and ongoing work regarding the AMP and the PIPP. CforAT is not currently	Joint IOU Advice Letter seeking approval of the study plan (provided as Attachment 3, labeled "Documents regarding contributions to development of the MB Study Plan"). PG&E made modifications to its budget billing proposals based on its direct conversations with CforAT in spring of 2024.	assisted the Commission in the making of its order or decision. *See* Part III.D, CPUC Comments, Disallowances and Adjustments [4, 7].

seeking compensation for work on these issues as we anticipate that they will be addressed in a Commission Decision or Resolution in the future. We reserve our right to seek compensation for work done in these areas with a future compensation request.		

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

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: NCLC and TURN: As set forth in detail above, CforAT prepared the majority of our filings in conjunction with NCLC and TURN. CforAT at times also shared various positions with other consumer advocates, including Cal Advocates and UCAN. Finally, CforAT worked cooperatively with the IOUs in various contexts to best address issues of concern to our constituency, including in the development of the Medical Baseline Study Plan and the Budget Billing issues raised by PG&E. This allowed CforAT to express support for various IOU actions.		Noted
d. Intervenor's claim of non-duplication: Throughout the proceeding to date, CforAT has worked diligently to avoid duplicating efforts of other parties. To this end, CforAT coordinated with NCLC and TURN to prepare the majority of our filings. CforAT routinely collaborates with these organizations, and the work completed together is efficient and minimizes potential duplication. While CforAT and TURN contribute their substantial experience before the Commission, NCLC contributes its experience addressing utility consumer issues nationwide. CforAT's focus on our specific constituency also ensures that the interests of this vulnerable customer group are represented. By coordinating and filing joint comments, each consumer advocate group is more efficient and the overall work of representing consumers is completed effectively.		Noted

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: The importance of the issues that remain under consideration in this proceeding is high for customers and even greater for customers who are dependent on access to reliable and affordable energy, such as CforAT's constituency of customers with disabilities and medical needs. CforAT's constituency is also disproportionately low-income and more likely to experience challenges with affording energy bills and being disconnected from service. For Phase 2, CforAT's constituency is at extreme risk during periods of extreme heat and thus have a vital interest in extreme heat protections. While it is difficult to attribute a specific dollar value to any of CforAT's contributions, the overall input of CforAT remains focused on reducing the risk of customers experiencing disconnections and losing access to essential utility service. In Phase 2, this focus is on protecting customers during periods of extreme heat. In this context, the support provided by CforAT to the Commission's efforts to reduce disconnections and provide increased protections to vulnerable customers exceeds the amount of compensation we are requesting.	After the adjustments and disallowances made to this claim, the remainder of the claimed costs are reasonable. *See* CPUC disallowances and adjustments in Part III.D.
b. Reasonableness of hours claimed: CforAT continues to work efficiently in all efforts expended in this docket. CforAT's work was led by Legal Director Melissa Kasnitz, who has substantial experience with issues of affordability and customer support programs and with advocating on behalf of people with disabilities and medical needs regarding issues of before the Commission. Ms. Kasnitz's expertise enabled her to participate efficiently to advance the interests of CforAT's constituency, as well as to coordinate effectively with other parties. As discussed above, CforAT's routine coordination with NCLC and TURN also ensured efficient and effective participation. As appropriate, Melissa Kasnitz delegated specific tasks (namely work with PG&E on development of its **budget billing proposal)** to CforAT's junior Staff Attorney Rachel Sweetnam. As Ms. Kasnitz appropriately supervised and reviewed Ms. Sweetnam's work, this type	After the adjustments and disallowances made to this claim, the remainder of the claimed hours are reasonable. *See* CPUC disallowances and adjustments in Part III.D.

	CPUC Discussion
of delegation is appropriate and efficient, particularly in light of the substantial differences in the hourly rates for Ms. Sweetnam and Ms. Kasnitz. Finally, CforAT was able to benefit from in-house expertise from the lead of the organization's Assistive Technology program in order to improve the design of the Medical Baseline Study. This was beneficial to the IOUs as well as the population of MB-eligible customers, and it took advantage of CforAT's internal resources effectively.	
c. Allocation of hours by issue: **2024 Time - Kasnitz (41.2 hours total)** **Budget Billing: 0.7 hours (<2%)** The issue area "Budget Billing" **includes** time spent working with PG&E on PG&E's request to address proposed modifications to PG&E's budget billing/level payment plan to best serve the needs of enrolled customers. **Caps: 5.4 hours (13%)** The issue are "Caps" includes time spent working on the issues addressed in the Payment Cap Decision, including work coordinating with other consumer advocates on relevant issues. **General Participation: 1.6 hours (4%)** The issue area "General Participation" includes time spent on procedural issues and other matters impacting the development of the proceeding. As a matter of professional responsibility and ethics, it is important for CforAT's counsel to review filings and rulings and otherwise follow developments to make sure that the interests of the customers we represent are appropriately considered in all ongoing activity. **MB Study: 5.6 hours (14%)** The issue area "MB Study" includes time spent working with the IOUs and commenting on the draft Medical Baseline Eligibility Study Plan to best ensure that the study results effectively capture the eligible population, as required by prior Commission decision. **Phase 2: 27.9 hours (68%)** The issue area "Phase 2" includes time spent on issues relevant to expanded extreme heat protections, including the Emergency Motion filed by TURN that raised the issues later scoped into Phase 2, as well as the statutory issues raised by the adoption of SB 1142,	Due to rounding, we note Kasnitz' allocation of hours for 2024 is 101%. *See* Part III.D.

	CPUC Discussion
2024 Time - Sweetnam (6.2 hours total) **Budget Billing: 6.2 hours (100%)** **2024 Time - McDonald-Peltier (2.8 hours total)** **MB Study: 2.8 hours (100%)** **2025 Time - Kasnitz (18.8 hours total)** **General Participation: 0.2 hours (<1%)** **Phase 2: 18.6 hours (99%)**	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Melissa W. Kasnitz	2024	50.1	$735	D.24-10-028	$36,835.50[3]	31.80 [3,4]	$735.00	$23,373.00
Melissa W. Kasnitz	2025	22.50	$760	See below	$ 17,100.00	14.20 [3,4]	$755.00 [1]	$10,721.00
Rachel Sweetnam	2024	6.2	$240	D.25-04-041	$ 1,488.00	0.00 [3]	N/A [2]	$0.00
Jennifer McDonald-Peltier	2024	2.8	$300	See below	$ 840.00	0.00 [6]	N/A [6]	$0.00
					Subtotal: $56,263.50[4]			***Subtotal: $34,094.00***
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Melissa W. Kasnitz	2025	5.5	$ 380	½ requested rate	$ 2,090.00	4.95 [5]	$377.50 [1]	$ 1,868.63

[3] The correct total for Melissa W. Kasnitz in 2024 is $36,823.50.
[4] The correct subtotal is $56,251.50.

CLAIMED						**CPUC AWARD**		
Rachel Sweetnam	2025	11.7	175.00	½ requested rate, see below	$ 2,047.50	10.53 [5]	$137.50 [2]	$1,447.88
					Subtotal: $ 4,137.50			***Subtotal: $3,316.51***
					TOTAL REQUEST: $ 60,401.00[5]			***TOTAL AWARD: $37,410.51***

*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

ATTORNEY INFORMATION	Date Admitted to CA BAR[6]	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Melissa W. Kasnitz	1992	162679	No
Rachel Sweetnam	2023	350075	No

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

Attachment or Comment #	Description/Comment
1	**Certificate of Service**
2	**Detailed Time Records (including Merits and time on compensation)**
3	**Documents regarding contributions to development of the MB Study Plan**
	2024 Rate Justification for Jennifer McDonald-Peltier In D.24-04-031, the Commission adopted a 2021 rate of $240.00 for Jennifer McDonald-Peltier. Based on review of her resume and background, verifying 20+ years of relevant experience as an Assistive Technology Specialist, the Commission found it reasonable to award this

[5] The correct total request is $60,389.00.
[6] This information may be obtained through the State Bar of California's website at http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch
[7] Attachments not included in final Decision.

Attachment or Comment #	Description/Comment
	2021 rate of $240, noting that it was near the median ($278.46) of the $219.12 -$356.50 rate range for an Expert -Not Otherwise Classified -V. Applying the relevant escalation rates for subsequent years, the Commission further awarded her a 2022 rate of $250 and a 2023 rate of $260. For 2024, CforAT requests a rate of $300, which would appropriately recognize Ms. McDonald-Peltier's substantial experience and place her rate near the median of the 2024 rate range ($312.74), as the Commission deemed appropriate in determining her original rate. In contrast, applying the 4.46% escalation factor to her 2023 rate of $260 would result in a rate of $271.60, which rounded to $270 is near the low end of the 2024 rate range, $253.40 to $390.78. In other words, using this method reaches the inconsistent result of dropping Ms. McDonald-Peltier's rate far below the 2024 median rate ($312.74) after three years more of experience, while the Commission found it reasonable for her original 2021 rate to be near the median of the rate range. Our requested $300 rate for 2024 is still below the median ($312.74), but more closely follows the original basis for her rate.
	2025 Rate Justification for Melissa W. Kasnitz CforAT Legal Director Melissa W. Kasnitz has not yet been assigned a rate for 2025. CforAT submitted a request for compensation in R.18-03-011 on June 6, 2025 requesting a 2025 rate of $760 per hour based on the application of the 2025 COLA to Ms. Kasnitz's 2024 rate of $735. We request that same rate here.
	2025 Rate Justification for Rachel Sweetnam CforAT Staff Attorney Rachel Sweetnam has not yet been assigned a rate for 2025. CforAT previously submitted a request for compensation in R.18-03-011 on June 6, 2025 requesting a 2025 rate for Ms. Sweetnam of $350, based on her move from the Attorney Level I category to the Attorney Level II category on the Commission's Hourly Rate Chart. CforAT requests that same rate here, with the specific request for ½ the requested rate for time spent preparing this request for compensation.

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Melissa W. Kasnitz (Kasnitz) 2024 & 2025 Hourly Rates	<u>2024 Hourly Rate for Kasnitz</u> D.24-10-028 verified a 2024 rate of $735 for Kasnitz as a Legal-Legal Director-III. We apply the same rate here. <u>2025 Hourly Rate for Kasnitz</u>

Item	Reason
	D.25-10-060 verified a 2025 rate of $755 for Kasnitz as a Legal-Legal Director-III. We apply the same rate here. Intervenor Compensation Claim Preparation is rated at ½ preparer's normal rate, bringing the 2025 claim preparation rate for Kasnitz to $377.50.
[2] Rachel Sweetnam (Sweetnam) 2024 & 2025 Hourly Rates	<u>2024 Hourly Rate for Sweetnam</u> Because we disallow all the hours claimed, we do not reach the issue of the reasonableness of the requested hourly rate. <u>2025 Hourly Rate for Sweetnam</u> D.25-10-060 verified a 2025 rate of $275 for Sweetnam as a Legal-Attorney - II. We apply the same rate here. Intervenor Compensation Claim Preparation is rated at ½ preparer's normal rate, bringing the 2025 claim preparation rate for Sweetnam to $137.50.
[3] Kasnitz & Sweetnam 2024 & 2025 Lack of Substantial Contribution	<u>Lack of Substantial Contribution (25.90 hours)</u> Public Utilities Code § 1802(j) states that a substantial contribution means that the intervenor "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." CforAT claimed 25.60 hours for time spent working on 'Additional issues' at PG&E's request, such as CBO Pilot and redesigning Budget Billing, reviewing PG&E's Level Pay Advice Letter, AMP & PIPP activities, and drafting a protest that was not submitted. These issues were not considered or addressed in D.24-11-005 or D.25-06-012. Because CforAT's efforts were not sufficiently contributory, we reduce 25.60 hours which breaks down as follows: <u>2024 Kasnitz (15.70 hours)</u> • 03/20/24 "Email exchange w/ D. Cheng (TURN) re: PG&E Advice Letter to transition customers to electronic billing" • 04/10/24 "Attend CBO Pilot Implementation Working Group Meeting • 04/10/24 "Review PG&E Level Pay Advice Letter; conf. w/R Sweetnam re: same & potential protest" • 04/17/24 "Conf. w/R. Sweetnam e: potential protest to PGE Budget Billing AL" • 04/29/24 "Follow up w/ PG&E re:budget billing advice letter" • 05/28/24 "Attend update call re: CBO Pilot development" • 07/01/24 "Review workshop notice re: Medical Baseline Study" • 07/22/24 "Email exchange w/ B. Smith (PG&E re: briefing on MB Study"

Item	Reason
	• 07/24/24 "Attend workshop on MB Study Plan" • 07/30/24 "Review MB Study Plan…" • 07/30/24 "Conf. w/ Jen M-P re: feedback on list of eligible conditions…" • 08/05/24 "Review SDGE Extension request re: CBO Pilot" • 08/06/24 "Draft informal feedback on MBL Study Plan" • 08/06/24 " Email exchange w/ Jen M-P re: finalized list of conditions and devices…" • 08/28/24 "Review draft MB Study Research Plan…" • 08/30/24 "Draft informal response re: MB Study Plan…" • 09/03/24 "Review IOU PIPP Metric Reports…" • 09/04/24 "Draft informal comments on MB draft study…" • 09/30/24 "Review Joint Advice Letter…" • 10/14/24 "Review IOU Als re: CBO Pilot…" • 10/19/24 "Email exchange w/NCLC re: potential comments on AMP research plan" • 10/15/24 "Draft response to Joint IOU AL seeking approval of MBL Study" • 10/30/24 " Review notice of workshop re: AMP evaluation study plan" • 11/12/24 "Review AMP Study Plan materials…" • 11/12/24 "Attend AMP Evaluation Workshop" • 11/13/24 "Email exchange w/ consumers re:…AMP study plan" • 11/13/24 "Email exchange w/ NCLC re:…AMP" • 10/19/24 "Email exchange w/ NCLC re: potential comments on AMP research plan" • 12/05/24 "Review notice of workshop re: CBO pilot evaluation plan" • 12/05/24 "Review notice of Working Group meeting re: CBO Pilot" • 12/09/24 "Attend CBO Pilot Working Group meeting…" • 12/17/24 "Review Joint IOU request for extension on deadlines re: PIPP…" • 12/19/24 "Attend workshop re: CBO Pilot Study Plan" 2025 Kasnitz (3.70 hours) • 02/14/25 "Review invitation to PIPP draft evaluation report…" • 02/28/25 "Attend presentation of PIPP Pilot findings…" • 03/03/25 "Review IOU PIPP Pilot Metric reports" • 03/04/25 "Review presentation slides for webinar (PIPP)" • 04/01/25 "Review final PIPP Evaluation Report…" • 04/03/25 "Review SoCalGas update re: CBO Pilot" • 04/03/25 "Email exchange w/ D. Cheng (TURN) re …PIPP evaluation" • 04/21/25 "Review notice of CBO Pilot WG Meeting" • 04/24/25 "Attend CBO Pilot WG meeting" • 04/24/25 "Review poll results (Ipsos)…" 2024 Sweetnam (6.20 hours) • 04/10/24 "Review PGE's advice letter"

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<tr><th>Item</th><th>Reason</th></tr>
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04/10/24 “Conf. with M. Kasnitz re: PGE’s Advice Letter”
04/12/24 “Review PGE Advice Letter”
04/17/24 “ Conf with M. Kasnitz re: concerns with PG&E Budget Billing Proposal”
04/17/24 “Draft protest”
04/19/24 “Draft protest”
04/22/24 “Draft protest”
04/24/24 “Draft protest”
04/26/24 “Attend call with PG&E re: AL”
04/29/24 “Draft Advice Letter (did not ultimately submit)…”
04/29/24 “Conf with M. Kasnitz re: PG&E AL”

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<tr><td>[4] Kasnitz 2024 & 2025 Disallowances</td><td>
<u>Administrative/Clerical (0.90 hour)</u>
The Commission does not compensate attorneys for time spent on clerical or administrative tasks, as such work is considered subsumed within professional fees. Administrative tasks typically include scheduling, communications with Commission’s Docket Office regarding filing procedures, overseeing administrative staff, photocopying, scanning and other similar clerical activities (See D.11-07-024 at 18). In line with this policy, we reduce 2.60 hours of time associated with the following entries:

<u>2024 (0.70 hour)</u>

10/14/24 “Email exchange w/consumers re: waiting for reply comments on PD continuing caps”
10/17/24 “Review various filings & rulings; email exchange w/ consumers re: coordination & task allocation”

<u>2025 (0.20 hours)</u>

01/07/25 “Review party email exchange re: request for extension on comment deadline”

<u>Lack of Substantial Contribution (0.70 hours)</u>
Kasnitz’s timesheet entries listed tasks performed on or after the required deadline to submit documents. These tasks could not have contributed to the decision-making process; therefore, we reduce 0.70 hours which breaks down as follows:

<u>2025 (0.70 hours)</u>

06/03/25 “Review party reply commends on Phase 2 PD”
06/09/25 “Review Phase 2 PD Rev. 1”

<u>Excessive Hours (5.60 hours)</u>
The length of a document does not always indicate its depth, substance, and impact. The reductions made here are not based on the length of the
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Item	Reason
	document, but due to excessive time spent producing it. Accordingly, we reduce 5.60 hours of time associated with the following entries: 2024 (1.90 hours) • Filed 08/28/24 "RESPONSE OF CENTER FOR ACCESSIBLE TECHNOLOGY AND NATIONAL CONSUMER LAW CENTER IN SUPPORT OF TURN EMERGENCY MOTION" 2025 (3.70 hours) • Filed 05/29/25 "JOINT COMMENTS OF CENTER FOR ACCESSIBLE TECHNOLOGY, THE UTILITY REFORM NETWORK, AND NATIONAL CONSUMER LAW CENTER ON PROPOSED PHASE 2 DECISION" • Filed 06/03/25 "JOINT REPLY COMMENTS OF THE UTILITY REFORM NETWORK, CENTER FOR ACCESSIBLE TECHNOLOGY, AND NATIONAL CONSUMER LAW CENTER ON THE PROPOSED DECISION OF ADMINISTRATIVE LAW JUDGE ANDREW DUGOWSON"
[5] Kasnitz and Sweetnam 2025 Claim Preparation Disallowance	2025 Excessive Hours (1.72 hours) In 2025, CforAT claimed 17.20 hours drafting the compensation claim request. The length of a document does not always indicate its depth, substance, and impact. The reductions made here are not based on the length of the document, but due to excessive time spent producing it. Accordingly, we reduce Sweetnam's hours by 10% (1.17 hours) and Kasnitz' hours by 10% (0.55 hour). Intervenors bear the burden of proof to show that all claimed hours were spent efficiently and made a substantial contribution, as required under program guidelines.
[6] McDonald-Peltier 2024 Reductions and Hourly Rate	Lack of Substantial Contribution (2.80 hours) Public Utilities Code § 1802(j) states that a substantial contribution means that the intervenor "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." In evaluating whether CforAT made a substantial contribution here, the Commission evaluates whether the hours claimed were commensurate with the substantial contribution. 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. CforAT claimed 2.80 hours for time spent performing tasks and research for the Medical Baseline study, including researching conditions to include survey modeling, lists of eligible devices, and feedback from outreach on

Item	Reason
	potential conditions and devices. Because CforAT's efforts were not sufficiently contributory, we reduce 2.80 hours, as it appropriately acknowledges the value of CforAT's contributions. 2024 Hourly Rate Because we disallow all the hours claimed, we do not reach the issue of the reasonableness of the requested hourly rate.

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. Center for Accessible Technology has made a substantial contribution to D.25-06-012 and D.24-11-005.

2. The requested hourly rates for Center for Accessible Technology's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.

3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.

4. The total of reasonable compensation is $37,410.51.

CONCLUSION OF LAW

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

ORDER

1. Center for Accessible Technology is awarded $37,410.51.

2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company, and San Diego Gas & Electric Company shall pay Center for Accessible Technology their respective shares of the award, based on their California-jurisdictional gas and electric revenues for the 2024 calendar year, to reflect the year in which the proceeding was primarily litigated. If such data is unavailable, the most recent gas and electric revenue data shall be used. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning November 1, 2025, the 75th day after the filing of Center for Accessible Technology's request, and continuing until full payment is made.

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

This decision is effective today.

Dated _____________, at Sacramento, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		**Modifies Decision?**	No
Contribution Decision(s):	D2411005 and D2506012		
Proceeding(s):	R1807005		
Author:	ALJ Dugowson		
Payer(s):	Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company, and San Diego Gas & Electric Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Center for Accessible Technology	August 18, 2025	$60,401.00	$37,410.51	N/A	See Part III. D CPUC Comments, Disallowances, and Adjustments

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Melissa	Kasnitz	Attorney	$735	2024	$735.00
Melissa	Kasnitz	Attorney	$760	2025	$755.00
Rachel	Sweetnam	Attorney	$240	2024	N/A
Rachel	Sweetnam	Attorney	$350	2025	$275.00
Jennifer	McDonald-Peltier	Expert	$300	2024	N/A

(END OF APPENDIX)