



PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

FILED

08/13/26

03:44 PM

A2403018

August 13, 2026

Agenda ID #24447
Ratesetting

TO PARTIES OF RECORD IN APPLICATION 24-03-018:

This is the proposed decision of Administrative Law Judge Nilgun Atamturk. 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 17, 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 of record may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure.

The Commission may hold a Ratesetting Deliberative Meeting to consider this item in closed session in advance of the Business Meeting at which the item will be heard. In such event, notice of the Ratesetting Deliberative Meeting will appear in the Daily Calendar, which is posted on the Commission's website. If a Ratesetting Deliberative Meeting is scheduled, *ex parte* communications are prohibited pursuant to Rule 8.2(c)(4).

/s/ MICHELLE COOKE

Michelle Cooke

Chief Administrative Law Judge

MLC:abb

Attachment

Decision **PROPOSED DECISION OF ALJ NILGUN ATAMTURK** (Mailed 8/13/2026)**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric Company to Recover in Customer Rates the Costs to Support Extended Operation of Diablo Canyon Power Plant from September 1, 2023, through December 31, 2025, and for Approval of Planned Expenditure of 2025 Volumetric Performance Fees. (U39E)

Application 24-03-018

**DECISION GRANTING COMPENSATION TO CALIFORNIANS
FOR GREEN NUCLEAR POWER, INC. FOR SUBSTANTIAL
CONTRIBUTION TO DECISION 24-12-033**

Intervenor: Californians for Green Nuclear Power, Inc.	For contribution to Decision (D.) 24-12-033
Claimed: \$52,273.22 ¹	Awarded: \$13,871.50
Assigned Commissioner: Karen Douglas	Assigned ALJ: Nilgun Atamturk

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	This decision approves Pacific Gas and Electric Company's (PG&E's) 2024 Diablo Canyon Power Plant (DCPP) extended operations revenue requirement of \$722.6 million.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812²:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§1804(a)):		
1. Date of Prehearing Conference:	May 31, 2024	Verified

¹ The correct total request for Californians for Green Nuclear Power, Inc. is \$52,273.36.

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

	Intervenor	CPUC Verification
2. Other specified date for NOI:	June 30, 2024	Verified
3. Date NOI filed:	June 24, 2024 - Same date as Motion for Party Status.	Verified
4. Was the NOI timely filed?		Yes
Showing of eligible customer status (§1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	A.16-08-006	A.23-10-009
6. Dates of ALJ ruling:	April 5, 2017	September 18, 2025. <i>See</i> CPUC Discussion in Part I.C below.
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	A.16-08-006	A.23-10-009
10. Date of ALJ ruling:	April 5, 2017	September 18, 2025. <i>See</i> CPUC Discussion in Part I.C below.
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§1804(c)):		
13. Identify Final Decision:	D.24-12-033	Verified
14. Date of issuance of Final Order or Decision:	December 20, 2024	Verified
15. File date of compensation request:	February 14, 2025	February 18, 2025
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
B.3	The text of D.24-12-033 does not stipulate the date CGNP's Motion for Party Status was filed. The Docket shows CGNP's Motion for Party Status was granted on June 25, 2024, by ALJ Atamturk.	Noted
B.5 & 12		On September 18, 2025, a ruling in A.23-10-009 determined Californians for Green Nuclear Power, Inc. (CGNP) is eligible as a "Category 3" customer, pursuant to §1802 (b)(1)(C) and had demonstrated significant financial hardship pursuant to §1802 (h). Based on this ruling, we find that CGNP is eligible to receive intervenor compensation in this proceeding.

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
1. CGNP made numerous unique contributions that originated from its team of scientists who have doctoral degrees and decades of experience in precisely the issues considered in this application. CGNP's legal representation is highly experienced in CPUC matters. CGNP's testimony supported Ordering paragraph 1.	CGNP's October 1, 2024, Opening Brief pages 6 and 7 and CGNP's October 24, 2024, Reply Brief pages 4 through 9. CGNP also references these conclusions in our December 16, 2024 Oral Arguments, our testimony during the September 11-12, 2024 Evidentiary Hearings, and our July 29, 2024, Opening Direct Testimony.	Noted, however, the citations CGNP provided as their specific references to their claimed contributions toward D.24-12-033 all have the same sentiment: Diablo Canyon Power Plant (DCPP) is a cost-effective, reliable, and clean option for generating electrical power for Californians. However, there is only a minor correlation between DCPP being cost effective and Ordering Paragraph (OP) 1 in D.24-12-033

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
		which states that "Pacific Gas and Electric Company is authorized to recover a revenue requirement of \$723 million covering the extended operations costs from September 1, 2023 to December 31, 2025". We also note that CGNP did not testify during the September 11-12, 2024, evidentiary hearing.
2. CGNP's testimony supported Ordering paragraph 2.	CGNP's October 1, 2024 Opening Brief pages 6 and 7 and CGNP's October 24, 2024 Reply Brief pages 4 through 9. CGNP also references these conclusions in our December 16, 2024 Oral Arguments, our testimony during the September 11-12, 2024 evidentiary hearings, and our July 29, 2024 Opening Direct Testimony.	Noted, however, the citations CGNP provided as their specific references to their claimed contributions toward D.24-12-033 all have the same sentiment: DCPD is a cost-effective, reliable, and clean option for generating electrical power for Californians. However, there is only a minor correlation between DCPD being cost effective and OP 2 in D.24-12-033 which states that "The methodology for calculation of the Diablo Canyon Power Plant non-bypassable charge and rate proposals by Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas and Electric Company, complies with Decision 23-12-036 and is

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
		adopted. Final rates should reflect the revenue requirement adopted in this decision.” We also note that CGNP did not testify during the September 11-12, 2024, evidentiary hearing.
3. CGNP's testimony supported Conclusions of Law paragraph 13. Our testimony largely supports the other 29 paragraphs in the Commission's Conclusions of Law.	Pages 8 and 9 of CGNP's October 1, 2024, Opening Brief shows our unique analysis providing additional detail regarding the low cost of the nuclear fuel and, "back-calculated the line 3 average annual nuclear expense and amortization at only \$34.4 million per year, showed the six-year total at \$240.8 million" CGNP also references these conclusions in our December 16, 2024, Oral Arguments, our testimony during the September 11-12, 2024 evidentiary hearings, and our July 29, 2024, Opening Direct Testimony.	We verify that CGNP made a substantial contribution towards Conclusion of Law (COL) 13. However, we cannot verify CGNP's claim of contributions to supporting the other 29 COLs as CGNP is required to make a more specific reference as to how their filings and arguments were adopted in whole or in part by the other COLs in D.24-12-033. <i>See</i> Rule 17.4(a) and the Intervenor Compensation Program Guide at 20. We also note that CGNP did not testify during the September 11-12, 2024 evidentiary hearing and that CGNP's quotation does not appear in its Opening Brief but appears on the same pages of its Reply Brief.

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: CUE and SBUA. CalCCA Neither opposes or supports it.		Noted
d. Intervenor's claim of non-duplication: CGNP continues to focus on DCP's safe, reliable, abundant, cost-effective and zero-emission generation. The six bullet points below summarize our oral arguments. Our oral arguments in turn summarize our earlier testimony in A.24-03-018. 1. We showed that based on PG&E's revenue requirement of \$723 million for the first record period which ends on December 31, 2025 that DCP's net cost is an economical \$17.30 / MWh. 2. We also utilized a large spreadsheet in PG&E's public workpapers to quantify the ratepayer benefits of DCP's extended operations during times the California power grid is being stressed We prepared detailed charts and graphs to explain how if the California SB 846 rules had applied between 2021 and 2023, California ratepayers would have enjoyed \$1.313 billion in rebates. 3. We also showed that the fuel cost for nuclear power is substantially below the cost of fossil energy for replacement dispatchable generation. 4. We utilized a power engineering perspective which shows that DCP is the largest in-state supplier of synchronous grid inertia (SGI.) SGI is essential to maintain the stability of California's power grid during ever-present significant step changes in generation or load. DCP is further advantaged in providing SGI because its annual capacity factor or percentage of full-power ON time typically exceeds 90%. This is the highest capacity factor of any California in-state generator. 5. CGNP was critical of the environmental hypocrisy of allowing Warren Buffett's PacifiCorp to export almost a billion dollars of mostly coal-fired power since November, 2014 into California exploiting a loophole in California SB 1368 (Perata, 2006) with the blessing of the CPUC. We tied the approval to the gargantuan PacifiCorp lobbying budget directed to the CPUC between 2019-2023. 6. We provided the Commission with a reference to a December 5, 2024, letter from the U.S. Nuclear Regulatory Commission Petition Review Board directed to a trio of organizations alleging DCP safety concerns that there is <i>"no imminent safety concern that warrants immediate shutdown of DCP"</i>.		Noted

PART III: REASONABLENESS OF REQUESTED COMPENSATION**A. General Claim of Reasonableness (§§ 1801 and 1806):**

	CPUC Discussion
a. Intervenor’s claim of cost reasonableness: CGNP’s extensive contributions covered the full scope issues considered in the proceeding. CGNP scientists brought to attention a range of issues that would not otherwise have been part of the record. These were backed by extensive research of the literature and of previous regulatory filings. As outlined above CGNP’s participation influenced the proceeding and decision in several respects, so that the hours claimed are reasonable. CGNP showed that based on PG&E’s revenue requirement of \$723 million for the first record period which ends on December 31, 2025, that the net cost is an economical \$17.30 / MWh. No other in-state dispatchable generator operates as reliably and cost-effectively as DCPD. Furthermore, DCPD produces the equivalent of five Hoover Dams each year. DCPD achieves these feats without producing significant air or water pollution.	After the adjustments made to this claim, the remainder of the claimed costs are reasonable. <i>See</i> Part III.D.
b. Reasonableness of hours claimed: CGNP was vigorously involved in every aspect of the proceeding. CGNP was assiduous in ensuring that its participation in all stages of this proceeding was efficient, professional and cost-effective. Both the hourly rates and overall costs claimed are reasonable, and generally consistent with awards to other parties having comparable experience. CGNP divided the efforts efficiently according to the expertise of its experts. Michael Antony Gatto is CGNP’s lead attorney. He is a former four-term member of the California State Assembly. During his tenure he presided over Assembly sessions as Assistant Speaker, and chaired the Appropriations, Consumer Protections and Privacy, and Utilities and Commerce Committees. He has substantial experience in cases before the California Public Utilities Commission. Dr. Nelson has been involved in community and regulatory matters regarding the safe operation of Diablo Canyon Power Plant (DCPP) since he and his wife relocated to San Luis Obispo, California in 2006. He began participating in Diablo Canyon Independent Safety Committee (DCISC) meetings in 2007. He began collaborating with CGNP in 2013, helping to found the nonprofit . His community outreach includes numerous letters to the editor, "OpEds" and participation in radio and television interviews regarding DCPD. He has also been active in pro-DCPP outreach to relevant governmental and regulatory bodies and regularly mans the Californians for Green Nuclear Power booth at the downtown San Luis Obispo Downtown Farmer's Market. He serves in a volunteer capacity as the President and Senior Legal Researcher of CGNP. He strongly advocates for the continued safe operation of DCPD well beyond 2025. He has donated tens of thousands of <i>pro-bono</i> hours in support of DCPD extended operations. In 2022, the American Nuclear Society recognized Dr. Nelson for his tenacious pro-DCPP advocacy with a presidential citation. Dr. Marinak, who delivered CGNP's Oral Arguments on December 16, 2024, has over 32 years experience as a computational physicist in nuclear energy research. He is the recipient of numerous professional awards.	After the adjustments made to this claim, the remainder of the claimed hours are reasonable. <i>See</i> Part III.D.

	CPUC Discussion
CGNP also relied on the input of other nuclear power professionals and nuclear power advocates who donated their time or supplied information on a <i>pro-bono</i> basis. The Commission should find that the involvement of each of the aforementioned experts was necessary for CGNP to address completely the range of issues in the proceeding. The Commission should approve CGNP's claim in its entirety.	
c. Allocation of hours by issue: 100% of CGNP's hours were focused on extending the safe and reliable operation of Diablo Canyon Power Plant to 2030.	Noted

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
[Michael Anthony Gatto]	2024	1.9	\$804.24	Attorney Level V High, 11.84% Escalator from 2021	\$1,528.06	0.0 [1]	N/A [1]	\$0.00
[Gene Nelson, Ph.D.]	2024	122.8	\$361.75	Level V mid for Expert Ph.D. physicist rate, 11.84% Escalator from 2021	\$44,422.90	79.1 [4]	\$135.00 [2]	\$10,678.50
Marty Marinak,	2024	3.0	\$495.99	Level V high for Expert	\$1487.97	3.0	\$470.00 [3]	\$1,410.00
[Marty Marinak, Ph.D.]	2024			Ph.D. physicist rate, 11.84% Escalator from 2021				
Subtotal: \$47,438.93						Subtotal \$12,088.50		

CLAIMED						CPUC AWARD		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
[Gene Nelson, Ph.D. Travel from home to Oral Arguments and return.]	2024	12	\$180.88	Half of Level V mid for Expert Ph.D. physicist rate, 11.84% Escalator from 2021	\$2,170.50 ³	12.0	\$67.50 [2]	\$810.00
Subtotal: \$2,170.56						Subtotal: \$810.00		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
[Gene Nelson, Ph.D.]	2025	13.9	\$180.88	Half of Level V mid for Expert Ph.D. physicist rate, 11.84% Escalator from 2021	\$2,514.16 ⁴	13.9	\$70.00 [2]	\$973.00
Attorney Michael Gatto	2025	0.3	\$402.12	Half of Attorney Level V High, 11.84% Escalator from 2021	\$120.64	0.0 [1]	N/A [1]	\$0.00
Subtotal: \$2,634.80 ⁵						Subtotal: \$973.00		
COSTS								
#	Item	Detail			Amount	Amount		
1	Parking 12/16/24	Dr. Nelson at Civic Center Plaza Garage, 355 McAllister			\$29.00	\$0.00 [5]		

³ The correct total for Nelson's claimed Other Fees should be \$2,170.56.

⁴ The correct total for Nelson's Intervenor Claim Preparation Claim Fee is \$2,514.23.

⁵ The correct subtotal for CGNP's Intervenor Claim Preparation Claim Fee is \$2,634.87.

CLAIMED			CPUC AWARD
<i>Subtotal: \$29.00</i>			<i>Subtotal: \$0.00</i>
<i>TOTAL REQUEST: \$52,273.22⁶</i>			<i>TOTAL AWARD: \$13,871.50</i>
*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 (§804(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. <i>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer’s normal hourly rate.</i>			
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ⁷	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Michael Anthony Gatto	12/01/2004	232674	No. License Status is Active on February 14, 2025 ⁸

C. Attachments Documenting Specific Claim and Comments on Part III:⁹

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	CGNP's Timesheet

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] 2024 and 2025 Michael Anthony Gatto	We reduce all hours CGNP claimed for Gatto's work in this request for compensation including Gatto's Intervenor Compensation Claim

⁶ The correct total request for CGNP is \$52,273.36.

⁷ This information may be obtained through the State Bar of California's website at <https://apps.calbar.ca.gov/attorney/LicenseeSearch/QuickSearch>.

⁸ The State Bar of California's website shows that the Gatto became inactive effective December 13, 2010. His status changed to active effective January 1, 2015.

⁹ Attachments are not included in the final decision.

Item	Reason
[Gatto] Reductions	Preparation time as explained below. Because we do not award Gatto any hours, we do not adopt an hourly rate for Gatto at this time. <u>Unnecessary or Vague Timesheet Entries (1.90 hours in Attorney, Expert, and Advocate Fees disallowed)</u> We find that CGNP has multiple vague or undefined time entries for Gatto's work, totaling 1.90 hours. Rule 17.4(b) requires that each time entry clearly identify the specific task performed. CGNP should provide clearer descriptions so that Commission staff are not left to make assumptions. The entries listed below lack the necessary detail to determine their relevance or value to the proceeding, and do not comply with program requirements. Accordingly, we reduce 1.90 hours from Gatto's work. We further note that the following activities do not clearly demonstrate how they contributed to the Commission's decision-making process. • 6/13/24: "Review CGNP Emails, Analyze Current Developments" • 6/21/24: "Review and Comment on CGNP's Proposed Submission" • 7/25/24: "Review CGNP Emails, Analyze Current Developments" • 7/30/24: "Review and analyze CGNP's upcoming filing, Brief Call with Gene Nelson, Ph.D." • 9/10/24: "Review CPUC Ruling" • 10/30/24: "Strategy and Update Call with Gene Nelson, Ph.D." 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. <u>Unnecessary Internal Duplication (0.30 hours in Intervenor Compensation Claim Preparation disallowed)</u> The Commission compensates intervenors for reasonable and efficient participation that contributes to the development of the record and aids in decision-making. However, we find that CGNP's claimed hours reflect duplication of efforts. Specifically, multiple representatives performed the same task (whether they worked on the same issues, attended the same meetings, hearings, or workshops, or participated in activities), where only one representative would have been sufficient, given the relative simplicity and limited scope of the issues involved. CGNP also failed to justify why multiple representatives were needed to perform this task. This level of staffing resulted in unnecessary, redundant, and inefficient participation that did not provide added value to the proceeding. Accordingly, we find that the involvement of multiple representatives in these instances was not justified and resulted in excessive hours. As a result, we reduce the claim by 0.30 hours in Intervenor Compensation Claim Preparation to ensure that only reasonable and non-duplicative efforts are compensated.

Item	Reason
[2] Nelson's 2024 and 2025 Hourly Rates	CGNP requested a 2024 hourly rate of \$361.75 for Nelson as an Expert – Physicist – Level V. CGNP filed a supplement to this request for compensation on November 18, 2025, which contained Nelson's resume and a statement saying that Nelson is a volunteer for CGNP. The resume provided shows that Nelson has been a Senior Legal Researcher for CGNP since 2016. This work includes advocating “in the public interest for the continued safe operation of Pacific Gas and Electric's (PG&E's) Diablo Canyon Power Plant (DCPP).” Nelson also is described as the “Lead author or editor for thousands of pages of written testimony before local, state, and federal decision makers.” Based on the submitted resume and the description of Nelson's role and responsibilities at CGNP, we find it reasonable to classify Nelson as an Advocate – Not Otherwise Classified – Level III with eight years of experience as of 2024. The rate range for this classification is \$97.18 to \$173.34 with a median of \$131.54. Given Nelson's experience, we adopt a 2024 hourly rate of \$135.00, and a 2025 rate of \$140.00. We apply one-half Nelson's 2024 hourly rate of \$135.00 for a travel time rate of \$67.50, and a 2025 Intervenor Compensation Claim Preparation rate of \$70.00.
[3] Marinak's 2024 Hourly Rate	CGNP requested a 2024 hourly rate of \$495.99 for Marinak as an Expert – Physicist – Level V. CGNP filed a supplement to this request for compensation on November 18, 2025, which contained Marinak's resume and a statement saying that Marinak is a volunteer for CGNP. The resume provided shows that Marinak has a Ph.D in Nuclear Engineering and has worked as a computational physicist since 1993. Based on the submitted resume we find it reasonable to classify Marinak as an Expert – Physicist– Level V with 30-plus years of experience as of 2024. This classification has a 2024 hourly rate range of \$299.50 to \$471.66, with a median rate of \$351.64. Based on CGNP's submitted information we find it reasonable to adopt a 2024 hourly of \$470.00 for Marinak.
[4] Nelson's 2024 Reductions	Public Utilities Code §1802(j) states that a substantial contribution “has substantially assisted the commission in the making of its order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer.” In our determination that CGNP made a contribution, we also evaluate whether the hours claimed were commensurate with the contributions made. Making a substantial contribution in and of itself does not entitle an intervenor to all its claimed fees and costs. Compensation must be reasonable and is granted for efficient, meaningful contributions. Because we find CGNP's efforts excessive and not sufficiently contributory, we reduce 43.70 hours from

Item	Reason
	Nelson’s work, as it appropriately acknowledges the value of CGNP’s contributions. <u>Rebuttal Testimony (23.30 hours in Attorney, Expert, and Advocate Fees reduced)</u> CGNP claimed 23.30 hours for Nelson’s work on their Rebuttal Testimony with tasks descriptions that included research, drafting, and filing. In Part II.A, CGNP does not cite their Rebuttal Testimony as one listed their claimed contributions to D.24-12-033. CGNP also does not list this document anywhere in this request for compensation. We reviewed CGNP’s rebuttal testimony and found that it provided arguments that Diablo Canyon Power Plant (DCPP) is cost-effective and reliable compared to other types of electric generation. This argument is minimally related to the issue in the Scoping Memo of whether Pacific Gas and Electric’s “forecast cost of operations and requested revenue requirement of \$418 million over the Record Period for DCPP is reasonable.” D.24-12-033 did not review other forms of electric generation when determining the reasonableness of DCPP’s revenue requirements. CGNP’s arguments from its Rebuttal Testimony were not adopted in full or in part by D.24-12-033 and did not supplement, complement, or contribute to the presentation of another party to the proceeding. We find that CGNP has not provided any explanation as to how their Rebuttal Testimony substantially contributed to the decision-making process, nor have we independently found a substantial contribution upon review of the document. We therefore find it reasonable to reduce 23.30 hours CGNP claimed for Nelson’s work on their Rebuttal Testimony. <u>Evidentiary Hearing (17.50 hours in Attorney, Expert, and Advocate Fees reduced)</u> CGNP claimed a total 21.70 hours for Nelson’s work related to the September 11 and 12, 2024, evidentiary hearing. This included: • 4.60 hours for preparing for the evidentiary hearing, • 14.20 hours for attending the evidentiary hearing, • 2.10 hours for filing and mailing CGNP’s exhibits, and • 0.80 hours for reviewing the evidentiary hearing’s transcript for accuracy. In Part II.A, CGNP’s claimed contributions relating to Nelson’s work at the evidentiary hearing is: “our testimony during the September 11-12, 2024 Evidentiary Hearings.” A review of the evidentiary hearing’s transcripts shows that Nelson was CGNP’s only representative present and the only time that Nelson spoke on the record was to offer CGNP’s exhibits into evidence. We find this insufficient to warrant an award 21.70 hours of work. We therefore find it reasonable to reduce Nelson’s time related to the evidentiary hearing from 21.70 hours to 4.20 hours. This reduction better

Item	Reason
	reflects CGNP's contributions to the decision-making process for Nelson's work relating to the evidentiary hearing. <u>Vague Timesheet Entries (0.70 hours in Attorney, Expert, and Advocate Fees reduced)</u> We find that CGNP has multiple vague or undefined time entries for Nelson's work, totaling 0.70 hours. Rule 17.4(b) requires that each time entry clearly identify the specific task performed. CGNP should provide clearer descriptions so that Commission staff are not left to make assumptions. The entries listed below lack the necessary detail to determine their relevance or value to the proceeding, and do not comply with program requirements. Accordingly, we reduce 0.70 hours from Gatto's work. We further note that the following activities do not clearly demonstrate how they contributed to the Commission's decision-making process. • 7/30/24: "Talk with Mike Gatto" • 10/30/24: "Call with Mike Gatto" 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. <u>Attending Commission Voting Meeting (2.20 hours in Attorney, Expert, and Advocate Fees disallowed)</u> CGNP requested 2.20 hours for Nelson's attendance at the Commission's December 19, 2024, voting meeting where the Commission approved the Decision at issue. Since parties to proceedings are not allowed to comment at Commission voting meetings per ALJ-412, Rule 4(c), Nelson's attendance could not have substantially contributed to the decision-making process. We therefore find it reasonable to reduce all requested time for attending that Commission Voting Meeting.
[5] Costs Reduction	CGNP claimed \$29.00 for parking at the CPUC on 12/16/24. However, CGNP did not file a receipt for this cost with their request for compensation. The Intervenor Compensation Program Guide at 23 states that "Reasonable out-of-pocket expenses directly related to an intervenor's participation are awarded if the CPUC finds the intervenor made a substantial contribution. ... you must provide copies of the receipts or invoices for any item costing more than \$20." Since we cannot verify this cost, we find it reasonable to not award CGNP the \$29.00 requested.

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 (<i>see</i> Rule 14.6(c)(6))?	No

If not:

Party	Comment	CPUC Discussion

FINDINGS OF FACT

1. Californians for Green Nuclear Power, Inc. has made a substantial contribution to D.24-12-033 in some aspects.
2. The requested hourly rates for Californians for Green Nuclear Power, Inc.'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 \$13,871.50.

CONCLUSION OF LAW

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

ORDER

1. Californians for Green Nuclear Power, Inc. is awarded \$13,871.50.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company shall pay Californians for Green Nuclear Power, Inc. the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning May 4, 2025, the 75th day after the filing of Californians for Green Nuclear Power, Inc.'s request, and continuing until full payment is made.
3. The comment period for today's decision is not waived.
4. Application 24-03-018 is closed.

This decision is effective today.

Dated _____, 2026, at San Marcos California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D2412033		
Proceeding(s):	A2403018		
Author:	Nilgun Atamturk		
Payer(s):	Pacific Gas and Electric Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Californians for Green Nuclear Power, Inc.	February 14, 2025	\$52,273.22 ¹⁰	\$13,871.50	N/A	See CPUC comments, Disallowances, and Adjustments section above.

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Michael	Gatto	Attorney	\$804.24	2024	N/A
Michael ¹¹	Gatto	Attorney	\$804.24	2025	N/A
Gene	Nelson	Expert	\$361.75	2024	\$135.00
Gene ¹²	Nelson	Expert	\$361.76	2025	\$140.00
Marty	Marinak	Expert	\$495.99	2024	\$470.00

(END OF APPENDIX)

¹⁰ The correct total request for Californians for Green Nuclear Power, Inc. is \$52,273.36.

¹¹ The Commission added this row to break out CGNP's Hourly Fee Information for Gatto by year.

¹² The Commission added this row to break out CGNP's Hourly Fee Information for Nelson by year.