



Decision _____

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

08/12/26

08:17 AM

Order Instituting Rulemaking Proceeding to Consider
Changes to Licensing Status and Obligations of
Interconnected Voice over Internet Protocol Carriers

Rulemaking 22-08-008
R2208008
(Filed August 25, 2022)

**INTERVENOR COMPENSATION CLAIM OF CENTER FOR ACCESSIBLE
TECHNOLOGY**

NOTE: After electronically filing a PDF copy of this Intervenor Compensation Claim (Request), please email the document in an MS WORD and supporting EXCEL spreadsheet to the Intervenor Compensation Program Coordinator at Icompcoordinator@cpuc.ca.gov.

Intervenor: CENTER FOR ACCESSIBLE TECHNOLOGY	For contribution to Decisions D.26-06-009
Claimed: \$17,608.10	Awarded: \$
Assigned Commissioner: Christine Harada	Assigned ALJ(s): Camille Watts-Zagha
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
Signature:	/s/ Paul Goodman
Date: August 12, 2026	Submitted by: Paul Goodman

PART I: PROCEDURAL ISSUES

(to be completed by Intervenor except where indicated)

A. Brief description of Decision:	D.26-06-009 determines how previously unregistered fixed VoIP service providers should add the Digital Voice Fixed (DVF) designation to their existing operating authority or report DVF services, adopts definitions for VoIP service providers that apply only in the context of the Commission's interconnected VoIP licensing and registration framework, clarifies that all facilities-based fixed interconnected VoIP service providers are subject to the heightened requirements of D.20-08-01, establishes a second opt-out period for nomadic-only providers, authorizes Staff to periodically
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	make changes to the Certificate of Public Convenience and Necessity application form, updates the application instructions to streamline the application process, and makes some minor clarifications to D.24-11-003. A subsequent decision, D.26-07-039, corrected typographical or obvious errors in D.26-06-009. CforAT does not request any compensation related to D.26-07-039.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812¹:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	1/24/2023	
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	2/21/2023	
4. Was the NOI timely filed?		
Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	R.21-06-017	
6. Date of ALJ ruling:	Nov. 8, 2021	
7. Has the Intervenor demonstrated customer status or eligible government entity status?		
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
8. Based on ALJ ruling issued in proceeding number:	R.21-06-017	
9. Date of ALJ ruling:	Nov. 8, 2021	
10. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
11. Identify Final Decision:	D.26-06-009	
12. Date of issuance of Final Order or Decision:	6/19/2026	
13. File date of compensation request:	8/12/2026	

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

	Intervenor	CPUC Verification
14. Was the request for compensation timely?		

C. Additional Comments on Part I: (use line reference # as appropriate)

#	Intervenor's Comment(s)	CPUC Discussion
	In addition to the information provided above, CforAT notes that we have previously requested compensation and been awarded compensation for substantial contributions to D.24-11-003 in this proceeding. "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.	

PART II: SUBSTANTIAL CONTRIBUTION
(to be completed by Intervenor except where indicated)

A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059): (For each contribution, support with specific reference to the record.)

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
Background: In a previous decision issued in this proceeding, D.24-11-003, the Commission created a regulatory framework for telephone corporations providing Voice over Internet Protocol (VoIP) services to California customers. This framework included the creation of two new utility type designations, a registration process, and an automatic migration process for	This background description is intended to provide context for our direct contributions in this proceeding. The specific contributions advanced by CforAT through our participation in the proceeding are detailed below.	

previously-registered VoIP providers; it also required providers to submit a performance bond, CPUC User Fee, and annual affiliate transaction report requirements. D.24-11-003 also streamlined existing requirements for other wireline corporations. D.24-11-003 at pp. 2-3. The proceeding remained open after the issuance of D.24-11-003 in order to address implementation issues regarding the new regulatory framework in Phase 2. D.24-11-003 at p. 3. On January 22, 2025, the assigned ALJ issued a Ruling Setting Prehearing Conference and Inviting Prehearing Conference Statements on Second Phase of Proceeding. CforAT, jointly with TURN, filed a Prehearing Conference Statement. TURN and CforAT Prehearing Conference Statement, filed Feb. 10, 2025 (PHC Statement). Subsequently, the Commission issued an Assigned Commissioner's Amended Scoping Memo and Ruling (Phase 2 Scoping Memo), which asked for party input on a number of issues, including question on the types of facilities that are used to provide VoIP service (Phase 2 Scoping Memo at pp. 3-4), and how the Commission should		
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address the status of providers who had not added the DVF utility type to their existing operating authority. Phase 2 Scoping Memo at p. 4. The Phase 2 Scoping Memo also stated the Commission’s intent to consider clarifications, modifications, and corrections to specific parts of the framework. Phase 2 Scoping Memo at pp. 4-5. In response to the issuance of the Phase 2 Scoping Memo, CforAT, in conjunction with TURN, filed TURN and CforAT Joint Comments on the Assigned Commissioner’s Amended Scoping Memo and Ruling, filed Apr. 28, 2025 (Comments on Phase 2 Scoping Memo). On May 28, 2026, the Commission held a virtual workshop regarding “Definition of Facilities of Interconnected Voice Over Internet Protocol (VoIP) Service Providers.” <i>See</i> ALJ Email Ruling Confirming Technical Workshop and Providing Instructions for Participation (May 14, 2025). CforAT attended and participated in the workshop. On June 10, 2025, the assigned ALJ issued a ruling requesting comment on the definition of facilities of interconnected VoIP providers. CforAT’s filings regarding the definition of facilities include:		
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• CforAT and TURN Joint Opening Comments on the Administrative Law Judge’s Ruling Seeking Comment on the Definition of Facilities of Interconnected Voice over Internet Protocol Service Providers, filed July 15, 2025 (Comments on Facilities Definitions); and • CforAT and TURN Joint Reply Comments on the Administrative Law Judge’s Ruling Seeking Comment on the Definition of Facilities of Interconnected Voice over Internet Protocol Service Providers, filed July 29, 2025 (Reply Comments on Facilities Definitions). On December 1, 2026, the assigned ALJ issued a ruling seeking comment on a Staff Proposal on Phase 2 issues. CforAT’s filings regarding the Staff Proposal include: • TURN and CforAT Joint Comments on the Staff Proposal on Phase 2 Issues, filed Jan. 12, 2026. (Comments on Phase 2 Staff Proposal) Additionally, CforAT filed the following documents: • CforAT Comments on the Proposed Decision Updating Regulatory Framework for Telephone Corporations Providing		
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Interconnected Voice over Internet Protocol Service and Closing Proceeding, filed May 28, 2026 (Comments on the Phase 2 PD).		
Jurisdiction: In comments on the Phase II Scoping Memo, CforAT argued that D.24-11-003 expressly held that VoIP providers are telephone corporations and that federal law does not preempt the Commission’s regulation of fixed VoIP services; CforAT recommended that the Commission reject any industry attempts to relitigate those issues. Comments on Phase 2 Scoping Memo at p. 2. As predicted, the Cloud Communications Alliance argued that the federal law preempted the Commission’s regulation of VoIP providers. <i>See</i> Comments on Facilities Definition at pp. 4-5. CforAT argued that the Commission had already ruled on this issue and that the Commission is not preempted from regulating VoIP service providers. Comments on Facilities Definition at pp. 4-5.	D.26-06-009 does not expressly address the jurisdictional arguments made in Phase 2. However, in its discussion of the definition of a “facilities-based provider,” D.26-06-009 explains that distinctions between levels of control over the infrastructure used to provision VoIP service “should not narrow the Commission’s jurisdiction over telephone corporations or limit otherwise applicable telephone corporation obligations, including but not limited to service quality, outages, public safety, consumer protection, reporting, surcharges, user fees, or enforcement.” D.26-06-009 at pp. 28-29. The Commission would not have made this statement (or imposed requirements and enforcement mechanisms) if it did not believe that it had the jurisdiction to do so. Given this tacit rejection of providers’ jurisdictional arguments, consistent with CforAT’s recommendation to reject any attempts by industry to relitigate this issue, it is reasonable to determine that CforAT’s jurisdictional arguments substantially contributed to the decision.	
Facilities Definition - Background: In D.24-11-003, the Commission adopted provisional definitions for “facilities-based” providers (i.e., providers who owned the infrastructure used to provision	In Phase II, the Commission asked parties whether those then-current definitions were sufficient. D.26-06-009 at p. 21; Phase II Scoping Memo at pp. 3-4. This information is provided to	

VoIP services) and “non-facilities-based” providers (i.e., providers that do not own telecommunications infrastructure necessary for transmitting telephone calls”). D.26-06-009 at pp. 20-21.	give context to CforAT’s discussion of our recommendations below.	
Facilities Definition - Recommendations: CforAT argued that “facilities” should include all of the equipment that a VoIP provider uses to provision service and asserted that “.... D.95-07-054 does not look only at last-mile infrastructure; instead, the facilities considered include the ‘instruments, switches, appurtenances, or appliances’ that a provider uses ‘in connection with or to facilitate communications.’ [citing D.95-07-054 at Appendix A, Section 3(M).] This language clearly indicates that there is more to facilities than the last mile connection between an end user and a physical network hub. In other words, physical technology used to route and process communications also falls under the ‘facilities’ umbrella.” D.26-06-009 at p. 23, citing Comments on Facilities Definition at p. 23.	D.26-06-009 acknowledges that facilities include more than just last-mile infrastructure, explaining that “an interconnected VoIP provider’s ‘facilities-based’ classification turns on whether it owns, operates, manages, or controls telecommunications infrastructure used to transmit its voice service, and whether that activity <i>involves new construction in public rights-of-way, equipment in existing structures, or no provider-controlled facilities at all.</i>” D.26-06-009 at p.29 (emphasis added). “We similarly find it reasonable to define ‘facilities’ based on the statutory definition of a telephone line in Pub. Util. Code Section 233, as the Commission had done in the CLEC context. Section 233 states that a telephone line ‘includes all conduits, ducts, poles, wires, cables, instruments, and appliances, and all other real estate, fixtures, and personal property owned, controlled, operated, or managed in connection with or to facilitate communication by telephone, whether such communication is had with or without the use of transmission wires.’” D.26-06-009 at p. 29.	
Facilities Definition - Recommendations: CforAT argued that the Commission’s definition of a “facilities-based provider”	“We find merit in Joint Consumers and SBUA’s recommendations not to define facilities-based too narrowly so as to	

should include providers that have control over the equipment used to provision their services. Reply Comments on Facilities Definition at pp 3-5; Comments on PD at p. 2. CforAT argued that some providers rely on third parties to handle interconnection or host telephone numbers, and some providers offer voice service through one affiliate while another affiliate owns the facilities used to provision that voice service. Reply Comments on Facilities Definition at p. 4. Comments on PD at p. 2.	exclude facilities that the provider ‘controls’ in providing voice service. We therefore revise the facilities-based definition adopted in D.24-11-003 to clarify that, for licensing and registration purposes, the relevant inquiry is whether the fixed interconnected VoIP telephone corporation owns, controls, operates, or manages facilities used to furnish voice service to California end users. Use of these other terms that demonstrate operational control over telecommunications facilities are consistent with Public Utilities (Pub. Util.) Code Section 234, which defines ‘telephone corporation’ as ‘every corporation or person owning, controlling, operating, or managing any telephone line in California for compensation within this state.’” D.26-06-009 at pp. 29-30.	
Operating Authority and Reporting - Background: On December 1, 2025, the assigned ALJ issued a ruling seeking comment on a Staff Proposal which recommended that the Commission require that certain wireline providers (i.e., fixed interconnected wireline providers) that received their operating authority prior to D.24-11-003): • Add the DVF type to their operating authority via a Tier 1 advice letter; • Create a new opt-out period for nomadic-only interconnected VoIP providers; • Correct and clarify D.24-11-003 to ensure that nomadic VoIP providers	This information is provided to give context to CforAT’s discussion of our recommendations, below	

pay all surcharges from when they first began operating in California; and • Fine nomadic-only VoIP providers that had failed to register beginning in May 2025. ALJ Ruling Seeking Comment on Staff Proposal on Phase 2 Issues at pp. 1-5, filed Dec. 1, 2025.		
Operating Authority and Reporting - Recommendations: CforAT supported the Staff Proposal’s recommendation that the Commission require that fixed interconnected VoIP providers report on “status and type of VoIP services offered, the number of fixed interconnected VoIP customers, and the number of VoIP access lines they are providing.” Comments on Phase 2 Staff Proposal at pp. 3-4; Comments on PD at p. 1.	D.26-06-009 requires that VoIP providers identify where in their service territory they offer VoIP services, their wireline facilities status, and the total number of fixed interconnected VoIP customers and access lines in California. D.26-029 at pp. 54-55, Ordering Paragraph 7.	
Operating Authority and Reporting - Confidentiality: CforAT recommended that information regarding access line counts should be available to the public. Comments on Phase 2 Staff Proposal at p. 4; Comments on PD at pp. 2-4.	While D.26-06-009 did not expressly find that information regarding access line counts should be available to the public, it did reject provider requests that the Commission pre-designate access line information as confidential. D.26-06-009 at pp. 19-20.	

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?	No	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	

c. If so, provide name of other parties: SBUA, TURN.	
d. Intervenor’s claim of non-duplication: Throughout the proceeding, CforAT worked diligently to avoid duplicating efforts of other parties, including by direct coordination and preparation of joint filings where appropriate and by maintaining focus, where appropriate, on those areas of particular concern to our unique constituency of utility customers with disabilities and medical needs, who are disproportionately low-income. Where CforAT had clear focus and/or expertise on particular issues, CforAT actively engaged on those issues. For example, CforAT’s Legal Counsel, Paul Goodman, has an extensive background in telecommunications jurisdictional issues and the Commission’s confidentiality requirements, and therefore took the lead on issues related to jurisdiction and confidentiality. Where another party had clear focus and/or expertise on an issue, CforAT minimized resources used to address that issue. Where CforAT and TURN contributed to comments on the same issue, we coordinated to ensure that each party’s work was additive rather than duplicative. CforAT notes that in recent decisions on intervenor compensation claims, the Commission has reprimanded parties for failing to sufficiently identify the individual efforts of parties who coordinate or file jointly. This apparently new requirement is troubling, not only because it is a significant shift from the Commission’s prior requirements because it fails to acknowledge the realities of both the mechanics of legal research and writing and the collaborative process. For example, the Commission has, on several occasions, reduced awards because intervenors filing jointly failed to sufficiently identify which sections of a document each intervenor “drafted.” This appears to be based on the assumption that each section of a document is drafted by only one intervenor, which is not the case. For example, CforAT and TURN consistently filed joint comments in this proceeding. For each of these documents, CforAT and TURN divided up responsibility for initial drafting of specific sections and issues. Once a draft was complete, CforAT and TURN engaged in a further, iterative process of exchanging and updating the original drafts. As a result, in successive drafts, CforAT and TURN each added additional research, analysis and language, raised issues or points of contention, and otherwise ensured that the final draft met CforAT and TURN’s mutual standards. As a result, it would be disingenuous for CforAT to claim that it was responsible, or “took the lead” in, drafting any particular section of CforAT and TURN’s joint filings, as both CforAT and TURN were equally responsible for the final quality of the documents. CforAT and TURN have engaged in this type	

of collaborative process for over a decade, and we can say with confidence that CforAT's collaboration with TURN minimizes duplication of effort while producing work of high quality that appropriately and efficiently represents the interests of not only both parties, but also consumers. Even in areas where CforAT's overall position was similar to that of other parties, including in our collaborative work with TURN, CforAT's focus on our specific constituency and their needs ensured that we provided a unique perspective and focus to ensure that the Commission directed appropriate attention to a vulnerable group of customers with concerns about communications needs that are specific to their situation.	
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C. Additional Comments on Part II: (use line reference # or letter as appropriate)

#	Intervenor's Comment	CPUC Discussion

PART III: REASONABLENESS OF REQUESTED COMPENSATION
(to be completed by Intervenor except where indicated)

A. General Claim of Reasonableness (§ 1801 and § 1806) to be completed by Intervenor:

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: This proceeding had limited consumer representation, especially when compared to the number of better-resourced participating providers and industry associations. Notably, Cal Advocates did not participate in this proceeding. The importance of the issues under consideration in this proceeding is extremely high for customers, and even greater for customer groups with specific challenges surrounding their relationship with communications services like CforAT's constituency of customers with disabilities and medical needs. For this reason, and to ensure that the needs of this unique constituency were addressed in all aspects of this proceeding, it is appropriate that CforAT expended substantial resources in participation, including active work in support of the decision addressed in this request for compensation.	

	CPUC Discussion
While it is difficult to attribute a specific dollar value to any of CforAT's contributions, the overall input of CforAT has been in support for ensuring that our constituency is not inappropriately burdened by a lack of access to communications services, that their needs are regularly given consideration, and that they are able to access communications services, including during emergency situations. In this context, the support provided by CforAT for the Commission's efforts to ensure that customers benefit from the Commission's COLR requirements exceeds the amount of compensation we are requesting. Additionally, CforAT notes that we exercised reasonable billing judgment in preparing this claim, i.e., made the decision to exclude certain hours spent on work that was arguably compensable.	
b. Reasonableness of hours claimed: As noted above, CforAT's extensive work in this docket is reasonable based on the importance of the issues under consideration and their potential impact on our constituency of utility customers with disabilities and medical needs, particularly given that this group of customers is both disproportionately low-income and highly reliant on dependable and affordable access to communications services. CforAT's work was led and primarily conducted by Legal Counsel Paul Goodman, who has substantial experience in addressing issues the availability, affordability, and accessibility, of communications services. While Mr. Goodman engaged in day-to-day participation in the proceeding, modest amounts of time were also spent by Melissa Kasnitz, CforAT's Legal Director, who has greater expertise regarding the communications needs of people with disabilities and medical needs. Ms. Kasnitz's subject matter expertise and strategic supervision of activity in the proceeding was limited, appropriate and efficient. For the limited occasions where more than one attorney attended the same meeting or hearing, this was to support the ability of each attorney to focus on those issues where they had primary responsibility for drafting. These practices improved efficiency overall and were reasonable, particularly given the participation of at least seventeen industry parties, each of which often had multiple representatives present at events such as the Prehearing Conference and workshops to advance their concerns. Overall, CforAT was effective and efficient in our participation in the various portions of this proceeding, and our work remained focused on the needs of our unique constituency. To the extent that our work overlapped to some degree with that of other parties, this reflects the shared effort of	

	CPUC Discussion
multiple stakeholders to provide vital input on the important issues under consideration. CforAT's contributions should not be reduced on this basis.	
c. Allocation of hours by issue: Hours of Paul Goodman, 2025: (12.3 hours) PHC 2: 1.1 hours, 8.9 percent The issue area "PHC 2" includes time spent preparing for and attending the Phase 2 Pre-Hearing Conference, including time spent on drafting the Joint PHC Statement. Scoping Memo: 1 hours, 8.1 percent The issue area "Scoping Memo" includes time spent on drafting comments on the Phase 2 Scoping Memo. Workshop: 9.5 hours, 77.2 percent The issue area "Working Hours" includes time spent preparing for and attending the May 26, 2025 workshop and drafting opening and reply comments on workshop issues. Staff Proposal: 0.7 hours, 5.7 percent The issue area "Staff Proposal" includes time spent reviewing and drafting comments on the Phase 2 Staff Proposal. Hours of Paul Goodman, 2026: (5 hours) Staff Proposal: 0.7 hours, 14.0 percent Ex Parte: 0.5 hours, 10.0 percent The issue area "Ex Parte" includes time spent on an ex parte meeting with Commissioner Harada's office. PD: 3.8 hours, 76.0 percent Hours of Melissa Kasnitz, 2025: (3.5 hours) PHC 2: 3.3 hours, 94.3 percent Workshop: 0.2 hours, 5.7 percent	

	CPUC Discussion
Hours of Melissa Kasnitz, 2026: (0.5 hours) Ex Parte: 0.5 hours, 100.0 percent.	

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	2025	3.5	\$ 755	D.25-10-060	\$ 2,642.50			
Melissa W. Kasnitz	2026	0.5	\$ 780	D. 26-07-022	\$ 390.00			
Paul Goodman	2025	12.3	\$ 680	D. 26-07-022	\$ 8,364.00			
Paul Goodman	2026	5	\$ 705	D. 26-07-022	\$ 3,525.00			
Subtotal: \$ 14,921.50						Subtotal: \$		
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 \$
[Person 1]								
[Person 2]								
Subtotal: \$						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Paul Goodman	2026	7.6	\$353.50	D.26-07-022	\$2,686.60			
[Preparer 2]								
Subtotal: \$2,686.60						Subtotal: \$		
COSTS								
#	Item	Detail			Amount	Amount		
1.								

CLAIMED				CPUC AWARD
2.				
<i>Subtotal: \$</i>				<i>Subtotal: \$</i>
<i>TOTAL REQUEST: \$17,608.10</i>				<i>TOTAL AWARD: \$</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 (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award. **Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate				
ATTORNEY INFORMATION				
Attorney	Date Admitted to CA BAR ²	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation	
Melissa W. Kasnitz	1992	162679	No	
Paul Goodman	2002	219086	No	

C. Attachments Documenting Specific Claim and Comments on Part III³:
(Intervenor completes)

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Detailed Time Records (Merits and Compensation)

D. CPUC Comments, Disallowances, and Adjustments (CPUC completes)

Item	Reason

² This information may be obtained through the State Bar of California's website at <https://apps.calbar.ca.gov/attorney/LicenseeSearch/QuickSearch>.

³ Attachments not attached to final Decision

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?	
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If so:

Party	Reason for Opposition	CPUC Discussion

B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	
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If not:

Party	Comment	CPUC Discussion

(Green items to be completed by Intervenor)

FINDINGS OF FACT

1. **CENTER FOR ACCESSIBLE TECHNOLOGY** [has/has not] made a substantial contribution to D.26-06-009.
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 \$_____.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. **CENTER FOR ACCESSIBLE TECHNOLOGY** is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay **CENTER FOR ACCESSIBLE TECHNOLOGY** the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay **CENTER FOR ACCESSIBLE TECHNOLOGY** their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated. If such data are unavailable, the most recent [industry type, for example, 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 [date], 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/is not] waived.

This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D.26-06-009		
Proceeding(s):	R.22-08-008		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
CENTER FOR ACCESSIBLE TECHNOLOGY	August 12, 2026	<i>\$17,608.10</i>		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Melissa	Kasnitz	Attorney	\$ 755	2025	
Melissa	Kasnitz	Attorney	\$ 780	2026	
Paul	Goodman	Attorney	\$ 680	2025	
Paul	Goodman	Attorney	\$ 705	2026	

(END OF APPENDIX)