



Decision _____

FILED

08/17/26

04:59 PM

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

A2205022

Application of Pacific Gas and Electric Company (U 39 E) for Review of the Disadvantaged Communities – Green Tariff, Community Solar Green Tariff and Green Tariff Shared Renewables Programs	Application 22-05-022 (Filed May 31, 2022)
And Related Matters	Application 22-05-023 Application 22-05-024

**INTERVENOR COMPENSATION CLAIM OF SMALL BUSINESS UTILITY
ADVOCATES AND DECISION ON INTERVENOR COMPENSATION CLAIM OF
SMALL BUSINESS UTILITY ADVOCATES**

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: Small Business Utility Advocates	For contribution to Decision (D.) 26-06-006 and D.24-05-065
Claimed: \$69,729.75	Awarded: \$
Assigned Commissioner: John Reynolds	Assigned ALJ(s): Valerie Kao
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/ Ariel Strauss
Date: 08/17/2026	Submitted by: Ariel S. Strauss

PART I: PROCEDURAL ISSUES
(to be completed by Intervenor except where indicated)

A. Brief description of Decision:	Decision 24-05-065 modified the existing Green Access Program tariffs to comply with Public Utilities Code Section 769.3 and established a community renewable energy program by layering a customer subscription model and a non-ratepayer-funded adder onto identified standard supply-side tariffs and contract mechanisms.
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	D.26-06-006 modified the community renewable energy program in light of termination of EPA funding and also addressed issues related to funding, cost-recovery, reporting, evaluation and oversight.
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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:	10/27/2022	
2. Other specified date for NOI:		
3. Date NOI filed:	11/28/2022 (<i>See</i> Comment #1)	
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:	A.22-02-005, <i>et al.</i>	
6. Date of ALJ ruling:	08/2/22	
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	A.22-02-005, <i>et al.</i>	
10. Date of ALJ ruling:	08/2/22	
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.26-06-006	
14. Date of issuance of Final Order or Decision:	06/17/2026	

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

	Intervenor	CPUC Verification
15. File date of compensation request:	8/17/2026	
16. Was the request for compensation timely?		

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

#	Intervenor's Comment(s)	CPUC Discussion
1	30 days from the prehearing conference was Saturday, November 26, 2022. Pursuant to Rule 1.15, the Notice of Intent was timely filed on the next business day, which was Monday, November 28, 2022.	

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
1. Show that Existing Programs Do Not Meet the Goals of AB 2316 for Small Businesses (Scoping Memo Issue A(2)) SBUA presented testimony, briefing and comments, based on detailed discovery, that there are approximately 200,000 small commercial customers in DACs (SBUA-02, p.2; ² SBUA Opening Brief, p.2) ³ yet are virtually unrepresented as green tariff customers (approximately 90% of SCE small commercial customer participants are natural gas and water distribution and wireless facilities) (SBUA-02, p.3; SBUA	The Decision (D.24-05-065) concluded that the existing programs do not meet the goals of AB 2316. It recounts SBUA's position, among others, that the existing program fails to serve distinct customer groups and "is inefficient and has low participation because it offers an unpredictable product with rate volatility." (pp. 37, 39; <i>see also</i> p. 59 (SBUA states the Green Access Program fails to meet statutory goals).)	

² Available at

<https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2205022;A2205023;A2205024/5902/505656556.pdf>.

³ Available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M509/K793/509793867.PDF>.

Opening Brief, p.2) despite surveys showing high interest (SBUA-02, p.4; SBUA Opening Brief, pp. 2-3). Small commercial customers are not eligible to participate in the subsidized green tariff programs. (SBUA-02, pp. 3-4.) SBUA criticized the existing programs for not finding sufficient source of qualifying power and recommended strategies for engaging small business customers as generation site hosts. (SBUA-01, pp. 2-3;⁴ SBUA Opening Brief, p. 6-7.) SBUA criticized the 5MW size minimum for DAC-GT projects as an unnecessary barrier. (Id., p. 7.) Based on its discovery, SBUA identified price fluctuations as a primary impediment to commercial customer subscription to green tariff programs. (SBUA-02, p.9 (quoting SCE data responses); SBUA Opening Brief, pp. 5-6,9.) SBUA cautioned that imposing Public Purpose Program (PPP) charges to cover the costs of green tariff programs incurs cost shift to non-participating customers and must be eliminated, or at least further minimized, and also imposed fairly across all customers. (SBUA-02, pp. 11-13; SBUA Opening Brief, pp. 11-12; SBUA Opening Comments on PD, pp. 3-4;⁵ Reply Comments on PD, p. 3.⁶)		
2. Revise Program Elements to Serve Small Business Needs (Scoping Memo Issue B) A primary emphasis of SBUA’s preferred approach is to increase outreach, technical support and other aspects of facilitation to	The Decision (D.24-05-065) recounts several of SBUA’s positions: “SBUA recommends Green Access Program tariffs include small business customers.” (p. 24) “SBUA also supports the creation of a successor	

⁴ Available at <https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2205022/5752/501442056.pdf>.

⁵ Available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M528/K399/528399614.PDF>.

⁶ Available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M528/K400/528400291.PDF>.

enable more small businesses in DACs to host generation sites, such as feed-in tariffs like used by LADWP, thereby mitigating the DAC-proximate supply problems faced by existing programs. (SBUA-01, p. 3; SBUA-02, pp.7-11; SBUA-03, pp. 5-8;⁷ SBUA Opening Brief, pp. 8-9; SBUA Opening Comments on PD, pp. 2-3.) SBUA recommended that small commercial customers be eligible customers in successor programs, including in subsidized programs if they experience high utility cost burden. (SBUA-01, p. 2; SBUA-03, p.4; SBUA Opening Brief, p. 10; <i>see also</i> SBUA Opening Comments on PD Implementing California Shared Renewables Portfolio, pp. 1-2 (April 27, 2026).⁸) SBUA likewise recommended a target or minimum small commercial customer participation level. (SBUA Reply Brief, p. 6.⁹) SBUA opposed numerous aspects of other parties' proposals, such as PG&E's "topping off" approach and SCE's "synthetic" green tariff program that would use RECs, which SBUA opined would not meet the goals of AB 2838. (SBUA-02, p. 6; SBUA Reply Brief, pp. 2-3.) In response to post-briefing ALJ questions, SBUA continued to oppose PG&E and SCE top-off proposals as successor programs because they "do not develop new community-based clean energy projects in 'reasonable proximity to the enrolled participant'[" (SBUA Reply Comments on Cost-Effectiveness	program but one that encourages the participation of small businesses in disadvantaged communities and minimal program constraints (e.g., minimum size requirements) to encourage sufficient power supply and reduce barriers to entry." (pp. 59-60; <i>see also</i> p.110 (recounting SBUA support for a successor program).) In apparent response to SBUA's comments on the Proposed Decision, it was revised to state that small commercial customers are eligible for Community Renewable Energy Program. (Redline of PD at 131-32.¹³) The Decision notes SBUA position as relevant to the record, such listing it among the parties seeking such a 5MW cap for Community Renewable Energy Program projects, and explaining there are other means of meeting the objective of encouraging smaller projects. (Decision, p.122.) Ultimately, the Commission did not adopt the position of a single party but combined elements of multiple proposals. (<i>See</i> p.58, COL No. 19.) The Commission also adopted many positions that SBUA advocated for and for which SBUA provided a supporting record. For instance, while not referencing SBUA's filings, akin to core aspects of SBUA's recommendation, Commission adopted SCE's proposed feed-in tariff approach to	
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⁷ Available at <https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2205022/5984/507387512.pdf>.

⁸ Available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M606/K281/606281575.PDF>.

⁹ Available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M510/K287/510287180.PDF>.

¹³ Available at <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M532/K344/532344292.pdf>.

Considerations, p. 1 (Aug. 10, 2023);¹⁰ <i>see also</i> SBUA Reply Comments on PD, pp. 1-2.) SBUA opposed likely-impractical grid reliability support requirements, such as mandatory battery storage proposed by Cal Advocates and TURN (SBUA Reply Brief, p. 4; SBUA Opening Comments on Cost-Effectiveness Considerations, pp. 2-3 (July 31, 2023);¹¹ SBUA Reply Comments on Cost-Effectiveness Considerations, p. 2). SBUA instead recommended “limiting mandatory elements that will make projects significantly more expensive, novel or complicated while also building in a second phase re-evaluation to determine if further enhancements can be supported by the market.” (SBUA Opening Comments on ALJ Ruling Seeking Comments on NVBT Proposal, p. 2 (Nov. 27, 2023).¹²) In this vein, SBUA opposed as impractical CCSA’s proposal of requiring 51% of each <i>project’s</i> subscribers to be low-income (as opposed to 51% of the Community Renewable Energy Tariff consumption) (SBUA Reply Brief, pp. 5-6.) Similarly, SBUA opposed as speculative TURN’s proposal of limiting the siting of generation facilities in areas that would not be considered not to trigger transmission upgrades given that such segments frequently already require upgrades for independent reasons. (<i>Id.</i>, p. 3.) SBUA opposed continuation of a 5MW minimum project size for any Green Tariff programs, and instead recommended various means of prompting or requiring smaller projects. (<i>Id.</i>, pp. 2-3.) SBUA advocated for requirements that new resources be sited near end-users with	encourage small 3MW projects supported by \$33 million appropriated to the Commission for community energy renewable program that focuses on low-income customers but allows small businesses to subscribe as well. (pp.115-19.) The Commission declined to incorporate several program aspects that SBUA opposed but without discussing citing to an individual party as the source of the rationale. The Commission allowed voluntary storage but did not adopt Cal Advocate’s position requiring batteries (<i>see</i>, pp. 24, 128, COL No. 66); it recounts TURN’s position that projects should have to demonstrate they are sized and in a location to avoid distribution circuit upgrades (p.75) but does also not adopt this proposal. Finally, the Commission accepted PG&E’s topping off approach because it would be implemented in conjunction with customer procurement of incremental, additional renewable power. Consistent with SBUA’s comments, the Commission, however, declined to approve SCE’s Green Share Program Tariff where customers could buy power from RPS-certified facilities that exists in SCE’s portfolio. (<i>See</i> description at p.63.) The Decision does not cite to any party as a basis for the denial. (<i>See</i>, p. 146; COL No. 39.)	
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¹⁰ Available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M516/K795/516795921.PDF>.

¹¹ Available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M515/K940/515940224.PDF>.

¹² Available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M521/K110/521110795.PDF>.

some flexibility, such as within 5 miles of DACs, to enable more potential site options. (SBUA Reply Brief, p. 4; SBUA Reply Comments on Cost-Effectiveness Considerations, p. 3; SBUA Reply Comments on PD, p. 2.) SBUA similarly recommended that subsidy levels for low-income-targeted programs could potentially be lower than 20% to increase the feasibility of offering low-income customers access to local, renewable energy. (<i>Id.</i>, pp.3-4.)		
3. Advocate for Fair Cost Recovery (D.26-06-006) Consistent with SBUA’s position leading up to the first decision (<i>see</i>, SBUA-02, pp. 11-12; SBUA Opening Brief, pp. 11-12; SBUA Opening Comments on Cost Effectiveness, pp. 1-2; SBUA Opening Comments on PD, p. 3; SBUA Reply Comments on PD, p. 2) SBUA recommended in connection with the second decision: “Stranded asset costs for which there are no active subscribers should be allocated to customer classes based on the class electricity utilization share, including unbundled customers, and then recovered from individual customers within each class via a PPP per-kilowatt-hour surcharge so that the individual’s cost scales volumetrically. This approach to class and individual customer allocation is most fair and least regressive.” (SBUA Opening Comments on ALJ Ruling Seeking Comments on Community Renewable Energy & Modified Green Tariff Programs, pp. 2-3 (April 28, 2025);¹⁴ <i>see also</i>, SBUA Reply Comments on ALJ Ruling Seeking Comments on Community Renewable Energy & Modified Green Tariff Programs (May 8,	Decision 26-06-006 (p.17) notes that “SBUA, and [other parties] generally agree that if a program closes before the full cost is recovered from participating customers, it is appropriate to recover outstanding costs from all ratepayers.” It then recounts that “SBUA argues that the Commission should allocate stranded asset costs to customer classes based on the class’s electricity utilization share, including unbundled customers, and then recover from individual customers in each class via a public purpose program per-kWh surcharge.” (<i>Id.</i>, p. 18.) The Commission concluded that, ultimately, “[b]ecause recovery of stranded legacy Green Tariff costs, as it relates to SDG&E, is being addressed in SDG&E’s 2023 ERRA compliance proceeding, this decision refrains from reaching a determination on that specific issue.” (<i>Id.</i>) In this instance, SBUA’s comments provided an important perspective recognized in the Decision 26-06-006. The Commission’s	

¹⁴ Available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M565/K140/565140057.PDF>.

2025) (accord); ¹⁵ SBUA Opening Comments on PD Implementing California Shared Renewables Portfolio, pp. 2-4 (objecting to PPP funding for non-subsidized aspects of the program and calling for uniform allocation methodology).)	determination to allow a resolution in another proceeding was not a rejection of SBUA's recommendation nor does it alter the value of SBUA's participation. (See D.09-04-027 at 4 (contribution was found where "final decision did add more discussion on the issue, in part to address TURN's comments.").)	
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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? ¹⁶	Yes.	
b. Were there other parties to the proceeding with positions similar to yours?	Yes.	
c. If so, provide name of other parties: Cal Advocates, TURN, Coalition for Community Solar Access		
d. Intervenor's claim of non-duplication: While not all parties actively participated, this proceeding included approximately three dozen parties, including the three large IOUs that filed applications, 15 renewable energy industry businesses or representatives, entities representing approximately a dozen CCAs or CCA-aligned organizations, four environmental groups, three community solar advocacy organizations, CAISO, the Coalition of Utility Employees, the City & County of San Francisco, the California Building Industry Association, Cal Advocates, TURN and SBUA. Representatives of the interests of bundled small commercial customers are specifically eligible for participation in the intervenor compensation program. (Pub. Util. Code § 1082(b)(1)(C).) SBUA was the only party focused specifically on the needs and interests of this segment and provided testimony and recommendations specific to them. SBUA documented that over 200,000 small business customers operate in DACs and barely participate in existing green tariff programs. (SBUA-02 at 2-3.) Public Utilities Code Section 1081.3(b) explains that the		

¹⁵ Available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M565/K498/565498474.PDF>.

¹⁶ The Office of Ratepayer Advocates was renamed the Public Advocate's Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

intervenor compensation program is intended to “encourage[] the effective and efficient participation of all groups that have a stake in the public utility regulation process.” In this environment, it was reasonable for SBUA to provide input. SBUA’s positions frequently overlapped, to an extent, with other parties but, as discussed in more detail above, but also diverged in important respects from the other ratepayer advocates, such by opposing TURN’s proposed solar storage requirements and grid placement constraints. (<i>See, e.g.</i>, SBUA Opening Comments on NVBT Proposal at 3.) SBUA also specifically opposed proposals by other parties, which the Commission rejected. The Commission, ultimately, adopted green tariff programs that drew on proposals from multiple parties. Likewise, SBUA made recommendations that contained a unique combination of elements. SBUA also identified potential common interest with Environmental Defense Fund and Center for Biological Diversity in increasing local power generation and conferred with those parties in an effort to support aligned proposals for a clearer record and more efficient outcome. SBUA notes that regarding overlap in positions, the statute declares: “Participation by a customer that materially supplements, complements, or contributes to the presentation of another party, including the commission staff, may be fully eligible for compensation if the participation makes a substantial contribution to a commission order or decision, consistent with Section 1801.3.” (Pub. Util. Code § 1802.5.)	
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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: SBUA participated in this proceeding on behalf of small business customers. In this proceeding, in 2022, SBUA filed a response to the applications of PG&E and SDG&E, filed a motion for party status on the proceeding associated with SCE’s application (prior to the consolidation of	

	CPUC Discussion
cases), participated in a joint-prehearing statement, attended the prehearing conference and filed a notice of intent to claim compensation. In 2023, SBUA propounded discovery (entered into the record as Appendix 1 to SBUA-02¹⁷ and Appendix C to SBUA-03), served opening (SBUA-01), rebuttal (SBUA-02) and surrebuttal (SBUA-03) testimony, made a motion seeking admission of testimony (granted by Administrative Law Judge's ruling of August 13, 2023), filed opening and reply briefs, opening and reply comments on cost effectiveness and comments on the net value benefit tariff proposal. In 2024, SBUA filed opening and reply comments on the proposed decision modifying green tariff programs. In 2025, SBUA filed opening and reply comments regarding Administrative Law Judge questions concerning cost recovery issues and, in 2026, filed opening comments on the proposed decision addressing cost recovery issues. As shown in Part B below, the vast majority of SBUA's time was dedicated to providing a detailed factual and policy record in 2023 and 2024 related to small business considerations applicable to problems with existing programs and recommendations for replacement programs. SBUA remained involved judiciously in the second phase of this proceeding—only 8.2 hours, 7.4% of the claim hours, were incurred in 2025 and 2026 in connection with D.26-06-006. SBUA's discovery-based testimony and comments provided essential data and perspective applicable to an otherwise, generally-ignored customer segment. SBUA's advocacy ensured that small commercial customers were clearly included in the Green Tariffs and Community Renewable Energy Tariff programs. SBUA's participation was focused, efficient and appropriately limited. The compensation request seeks an award of <u>\$66,205</u> for approximately <u>111 hours</u> of work, excluding compensation related time. This amount of cost and time is reasonable in light of the importance of this proceeding and the significance of the small commercial segment.	
b. Reasonableness of hours claimed: SBUA relied principally on two experienced attorneys for the work for which compensation is sought in this request. SBUA assigned primary responsibility to mid/senior-level attorney, Ariel Strauss. Mr. Strauss has represented SBUA in numerous Commission proceedings on a wide range of issues, including general rate cases and rulemakings, such pertaining to RPS (R.18-07-003; R.24-01-017) and decarbonization (R.19-01-011). Mr.	

¹⁷ Available at <https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2205022;A2205023;A2205024/5902/505807850.pdf>.

	CPUC Discussion
Strauss undertook discovery, participated in day-to-day activities, worked on discovery requests and expert testimony and drafted core filings, such as briefs. Expert Daniel Brennan provided technical analysis of discovery responses and policy recommendations reflected in SBUA's testimony. SBUA's General Counsel, James Birkelund, provided high-level strategic direction and critical feedback, leveraging his expertise to refine SBUA's litigation positions while managing work efforts. His oversight ensured that SBUA's involvement was focused, impactful, and aligned with the organization's mission to advocate for small business interests. SBUA also has weekly strategy meetings between Mr. Birkelund and in-house employees regarding litigation cases. SBUA is not seeking compensation for these conferrals or Mr. Brennan's time. Mr. Birkelund and Mr. Strauss are employed by E&E Law Corp. (E&E Law), which represents SBUA in this matter on a contingency basis at prevailing market rates. <i>See Attachment #3</i> (Statement of Work detailing contractual terms). SBUA submits that it made significant contributions to the proceeding and all of the recorded hours claimed were justifiably and efficiently expended given the level of effort required to participate in this case.	
c. Allocation of hours by issue: 1. Existing Programs Do Not Meet the Goals of AB 2316– 25.8hrs (23%) 2. Revise Program Elements to Meet Small Business Needs– 53.65hrs (48%) 3. Advocate for Fair Cost Recovery (D.26-06-006) – 23.25hrs (21%) 4. General Participation (including 1.5 hours attending Prehearing Conference)– 8.35hrs (8%) Category 1 above is within the scope of Issue A(2) of the Assigned Commissioner's Scoping Memo & Ruling, issued December 2, 2022. Category 2 is within the scope of Scoping Memo Issue B(1)(a),(b) and B(2). Category 3 is within the scope of Scoping Memo Issue B(1)(b). Each biller prepares his or her own timesheet entries. Due to familiarity with the proceeding, the primary attorney takes the lead in compiling the intervenor compensation claim and describing SBUA's contributions. The attorney(s) then confirm the proposed claim with SBUA's executive director.	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Ariel Strauss	2022	9.3	\$465	D.24-08-056	\$4,324.50			
Ariel Strauss	2023	45.8	\$510	D.24-08-056	\$23,358			
Ariel Strauss	2024	11.9	\$530	D.26-07-053	\$6,307			
Ariel Strauss	2025	3	\$550	D.26-07-053	\$1,650			
Ariel Strauss	2026	3.2	\$585	D.26-07-053 rate for 2025 escalated by 3.35% per Reso. ALJ- 393	\$1,872			
James Birkelund	2022	12.55	\$705	D.23-02-016	\$8,847.75			
James Birkelund	2023	18.55	\$770	D.24-08-056	\$14,283.50			
James Birkelund	2024	4.75	\$800	D.26-07-053	\$3,800.00			
James Birkelund	2025	2	\$830	D.26-07-053	\$1,660.00			
Subtotal: \$66,204.75						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: \$0						Subtotal: \$		

CLAIMED						CPUC AWARD		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Ariel Strauss	2022	1.7	\$232.50	50% of 2022 rate	\$395.25			
Ariel Strauss	2026	10.7	\$292.50	50% of 2026 rate	\$3,129.75			
Subtotal: \$3,525						Subtotal: \$		
COSTS								
#	Item	Detail		Amount	Amount			
Subtotal: \$0					Subtotal: \$			
TOTAL REQUEST: \$69,729.75					TOTAL AWARD: \$			
*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 ¹⁸	Member Number		Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation				
Ariel S. Strauss	March 2012	282230		No				
James M. Birkelund	March 2000	206328		No				

C. Attachments Documenting Specific Claim and Comments on Part III¹⁹:
(Intervenor completes; attachments not attached to final Decision)

¹⁸ This information may be obtained through the State Bar of California's website at <https://apps.calbar.ca.gov/attorney/LicenseeSearch/QuickSearch>.

¹⁹ Attachments not attached to final Decision.

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service (<i>see</i> attachment under separate cover)
Attachment 2	Time Sheet Records with Allocation of Hours by Issue
Attachment 3	Statement of Work with Contract Terms for E&E Law

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

Item	Reason

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. SMALL BUSINESS UTILITY ADVOCATES [has/has not] made a substantial contribution to D.26-06-006 and D.24-05-065

2. The requested hourly rates for **SMALL BUSINESS UTILITY ADVOCATES**'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. **SMALL BUSINESS UTILITY ADVOCATES** is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay **SMALL BUSINESS UTILITY ADVOCATES** the total award. [for multiple utilities: "Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay **SMALL BUSINESS UTILITY ADVOCATES** 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 **SMALL BUSINESS UTILITY ADVOCATES**'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.26-06-006 and D.24-05-065		
Proceeding(s):	A.22-05-022, A. 22-05-023, A.22-05-024		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
SMALL BUSINESS UTILITY ADVOCATES	8/17/2026	\$69,729.75		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Ariel	Strauss	Attorney	\$465	2022	
Ariel	Strauss	Attorney	\$510	2023	
Ariel	Strauss	Attorney	\$530	2024	
Ariel	Strauss	Attorney	\$550	2025	
Ariel	Strauss	Attorney	\$585	2026	
James	Birkelund	General Counsel	\$705	2022	
James	Birkelund	General Counsel	\$770	2023	
James	Birkelund	General Counsel	\$800	2024	
James	Birkelund	General Counsel	\$830	2025	

(END OF APPENDIX)

ATTACHMENT 1

Certificate of Service

(submitted under separate cover)

ATTACHMENT 2

Time Sheet Records with Allocation of Hours by Issue

A.22-05-022, et al. Request for Intervenor Compensation

Attachment 2. Time Sheet Records with Allocation of Hours by Issue and Contribution to D.24-05-065 and D.26-06-006

Time Sheet Entries for Attorney Ariel Strauss

Issue Identification

1. Existing Programs Do Not Meet the Goals of AB 2316 for Small Business
2. Revise Program Elements to Serve Small Business Needs
3. Advocate for Fair Cost Recovery
4. General Participation

<u>Date</u>	<u>Activity</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>
6/14/2022	Confer with J. Birkelund (JB) re response to SCE application				0.1
7/6/2022	Review SDGE application	0.1	0.1	0.1	
7/6/2022	Review SCE application	0.1	0.2	0.1	
7/6/2022	Review PG&E Application	0.1	0.1	0.1	
7/6/2022	Draft response to SDGE application	0.1	0.1	0.1	0.2
7/6/2022	Draft response to PGE application		0.1	0.1	0.2
7/8/2022	Draft motion for party status for SCE application				0.3
7/8/2022	Request testimony materials from IOUs				0.2
7/8/2022	Email to Cal Advocates in support of motion to consolidate				0.1
7/8/2022	Provide update to JB regard SBUA responses to applications				0.2
7/11/2022	Continue drafting SBUA motion for party status in SCE application				0.4
7/13/2022	Complete drafting motion for status in SCE proceeding				0.3
9/16/2022	Review IOU filings and confer with JB regarding proposed issues for scope	0.3	0.5	0.4	
9/29/2022	Review and comment on Joint PHC Statement				0.2
10/3/2022	Email to PG&E re eligibility of small businesses in GTSR	0.1			
10/3/2022	Revise Joint Prehearing Statement				0.2
9/28/2022	Respond to parties re scope of issues				0.3
10/4/2022	Case update to JB				0.1
10/24/2022	Review PHC agenda and submit speaker information				0.1
10/24/2022	Confer with JB regarding issues for PHC				0.3
10/25/2022	Confer with expert, D. Brennan, re issues for PHC	0.3	0.3		
10/26/2022	Receive preliminary outline from expert	0.1			
10/27/2022	Review expert's issue outline		0.1		
10/27/2022	Attend PHC				1.5
11/1/2022	Confer with JB regarding next steps from PHC				0.2
11/1/2022	Advise expert on next steps for propounding discovery	0.2			
11/4/2022	Confer with expert re research for data requests	0.2			
11/8/2022	Confer with JB re case status				0.1
11/22/2022	Confer with JB re submitting data request				0.1
12/2/2022	Receive scoping memo and input schedule dates				0.1
12/6/2022	Status update with JB				0.1
1/4/2023	Review and revise draft data request	0.7			
1/5/2023	Finalize data request to SCE	0.4			
1/5/2023	Finalize data requests to SDG&E and PG&E	0.4		0.2	
1/10/2023	Provide analysis of data responses to expert for review	0.4			
1/13/2023	Provide additional data to expert for review	0.1			
1/13/2023	Review intervenor motions for party status, NOIs, protests and response to identify potential partners/overlap for	0.3	0.3		
1/13/2023	Confer with JB re potential partnerships	0.1	0.1		
1/13/2023	Call and email to Center for Bio Div re potential partnership		0.3		
1/13/2023	Call with D. Brennan (DB) re testimony	1.1	1.1		
1/17/2023	Follow up with DB re testimony outline	0.1	0.1		

<u>Date</u>	<u>Activity</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>
1/17/2023	Email correspondence with expert inquiring compensation structure for small commercial-generated solar power in excess of NEM cap		0.5		
1/18/2023	Video call w/ Cent. for Bio. Div. and DB re potential collaboration on need to increase participation of small businesses, including as suppliers of green power		1.0		
1/18/2023	Follow up with DB re testimony rough draft and takeaway from call with CBD		0.1		
1/20/2023	Revise and finalize testimony	0.1	0.7		
1/22/2023	Follow up with JB re rebuttal testimony	0.1			
1/25/2023	Confer with JB re case status				0.2
1/25/2023	Send DB SDG&E data response			0.1	
2/28/2023	Confer with JB re next steps				0.1
3/9/2023	Call with D. Brennan re surrebuttal testimony	0.6	0.2		
3/10/2023	Review SDG&E CES advice letter		0.2		
3/10/2023	Update JB and DB re same		0.1		
3/13/2023	Review DB draft supplemental testimony	0.1	0.1		
3/13/2023	Confer with JB and DB re same	0.1	0.1		
3/14/2023	Further review of draft testimony in preparation for call with DB re same	0.1			
3/14/2023	Confer with DB re revisions to rebuttal testimony	0.1	0.1	0.1	
3/15/2023	Revised DB draft rebuttal testimony based on data responses	2	2	1.5	
3/15/2023	Confer with JB re rebuttal testimony	0.2	0.1	0.1	
3/20/2023	Email to DB re next steps for rebuttal testimony	0.1	0.1	0.1	
3/27/2023	Confer with DB re rebuttal testimony	0.1	0.1		
3/30/2023	Review SCE data response	0.1	0.1		
3/31/2023	Review DB revisions to rebuttal testimony	0.1	0.1		
4/5/2023	Revise rebuttal testimony based on review of IOU supplemental testimony	2.2	2.2	0.4	
4/5/2023	Call with JB re testimony	0.2	0.6		
4/10/2023	Confer with DB re drafting surreply testimony outline	0.1	0.1		
4/11/2023	Draft second data request to SCE for JB and DB for review		0.2		
4/11/2023	Respond party emails regarding request for extension of surreply testimony				0.1
4/17/2023	Provide JB analysis of SCE second data response	0.2	0.2		
4/28/2023	Draft surrebuttal testimony for DB review	0.5	4.8		
4/28/2023	Finalize surrebuttal testimony after D. Brennan feedback	0.2	0.6		
5/5/2023	Draft motion to enter exhibits into record for JB review				0.6
5/8/2023	Review JB edits to motion				0.1
5/9/2023	Confer with JB re case status				0.1
5/17/2023	Draft opening brief	1	2.1	0.8	
5/18/2023	Confer with EDF re EDF testimony				0.2
5/30/2023	Draft reply brief	1	5		
6/28/2023	Confer with James re cost effectiveness questions		0.1		
7/7/2023	Respond to procedural email from SEIA re workpapers				0.1
7/21/2023	Draft response to ALJ cost questions		0.5		
7/31/2023	Finish drafting response to ALJ questions		0.9		
8/10/2023	Draft reply comments on ALJ cost questions		2		
11/27/2023	Draft opening comments on ALJ questions		1.4		
3/4/2024	Review PD for JB comments	0.1	0.2	0.1	
3/25/2024	Draft opening comments on PD	0.3	2	0.7	
4/1/2024	Draft reply comments		1.5	0.4	
7/10/2024	Draft opening comment on ALJ implementation questions		0.3	3.9	
7/29/2024	Draft reply comments			2.4	
4/28/2025	Draft comments on ALJ questions			2.2	
5/8/2025	Draft reply comments			0.8	
4/27/2026	Draft comments on PD		0.4	2.8	
	Total:	14.8	34.1	17.5	6.8

<u>Date</u>	<u>Activity</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>
<u>Compensation Claim Preparation Time</u>					
11/23/2022	Draft NOI for review by JB and DB	1.4			
11/28/2022	Revise NOI based on comments from JB and DB	0.3			
8/11/2026	Draft comp claim	1.2			
8/16/2026	Draft comp claim	4.9			
8/17/2026	Finalize comp claim	4.6			

A.22-05-022, et al. Request for Intervenor Compensation
Attachment 2. Time Sheet Records with Allocation of Hours by Issue and Contribution to D.24-05-065 and D.26-06-006

Time Sheet Entries for General Counsel James Birkelund

Issue Identification

1. Existing Programs Do Not Meet the Goals of AB 2316 for Small Businesses
2. Revise Program Elements to Serve Small Business Needs
3. Advocate for Fair Cost Recovery
4. General Participation

<u>Date</u>	<u>Activity</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>
6/1/2022	Initial analysis of application, outline SBUA interests in intervening.	0.5	0.5		
6/7/2022	Addn rev and analysis of applications.	0.5	0.5		
6/14/2022	Confer w A. Strauss re SBUA protest				0.1
7/8/2022	Rev parties' responses.	0.5	0.5		
7/26/2022	Crrspnd w A. Strauss re green tariffs for small commercial customers.		0.25		
9/12/2022	Rev Notice of PHC and ALJ Qs.				0.25
9/14/2022	Crrspnd w A. Strauss re PHC issues.				0.25
10/4/2022	Rev joint PHC statement and emails w PG&E and parties.	0.1	0.1	0.05	
10/20/2022	Crrspnd w A. Strauss re strategy w expert.	0.1	0.1	0.05	
10/24/2022	Emails w Litigation Team re expert development of SBUA positions.		0.25		
10/25/2022	Memo to D. Brannon re SCE's green tariff rate, community renewable program, and share rate.		1.5		
10/26/2022	Detailed strategy emails w D. Brennan to develop SBUA positions.	0.5	0.5		
10/27/2022	Rsrch re GTSR programs and small business participation; outline potential SBUA positions re improvements to GTSR program.		1.75		
11/1/2022	Confer w A. Strauss re expert rsch on small business interests in Applications.		0.25		
11/1/2022	Strategy direction to expert D. Brennan re research and SBUA data requests.	0.1	0.4		
11/3/2022	Rev quarterly GTSR program progress reports, notes re lack of info re small commercial customers.		0.5		
11/4/2022	Instructions to D. Brennan re rsch and development of data requests.	0.5	0.25		
11/8/2022	Internal call re rsch for SBUA data requests.	0.25			
11/22/2022	Strategy call w A. Strauss re discovery.				0.1
12/2/2022	Evaluate Scoping Memo and SBUA potential arguments for op testimony.	0.5	0.5		
12/6/2022	Tcw D. Brennan re op testimony.		0.25		
12/6/2022	Tcw A. Strauss re data requests.				0.1
1/6/2023	Rev SBUA data requests (PG&E, SCE, SDG&E)	0.25			
1/6/2023	Crrspnd w SCE re responses to SBUA data request.	0.25			
1/6/2023	Rev addn data responses from IOUs.	0.25			
1/20/2023	Rev PG&E Data Responses	0.25			
1/20/2023	Confer w Litigation Team re SBUA testimony.	0.1			
1/20/2023	Rev SCE responses to SBUA data requests.	0.25			
1/21/2023	Rev other parties' op testimony.	0.25			
1/27/2023	Rev SDG&E's response to SBUA Data Request.	0.25			
2/2/2023	Confer w expert re IOU data response to SBUA.	0.25			
2/6/2023	Confer w expert re addn testimony.		0.25		
2/8/2023	Analyze direct testimony and direction SBUA expert D. Brennan.	0.25	0.5		
3/13/2023	Rev expert memo w graph on small commercial customers in DACs.		0.5		
3/15/2023	Call w A. Strauss re the same.	0.2	0.1	0.1	
3/15/2023	Rev expert memo analyzing data responses and proposals to increase small commercial customers involvement.		0.75		
3/16/2023	Crrspnd w Litigation Team re rebuttal testimony.	0.1	0.2	0.2	
3/28/2023	Rev memo from D. Brennan re positions for rebuttal test.	0.3	0.1	0.1	
4/5/2023	Strategy call w A. Strauss re modifications to testimony.	0.2	0.6		
4/5/2023	Rev other parties' testimony.	0.5	0.5		
4/6/2023	Edits to draft testimony	0.5	1		
4/7/2023	Work w expert to edit and finalize positions in rebuttal testimony.	0.75	1		
4/11/2023	Rev to SBUA 2nd set of data requests.	0.25			
4/11/2023	Strategy w Litigation Team on revising testimony.	0.2	0.3		

<u>Date</u>	<u>Activity</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>
4/17/2023	Strategy w A. Strauss re promoting small generation facilities that serve small businesses.		0.5		
4/17/2023	Rev SCE data responses to SBUA.	0.5			
4/25/2023	Crrspnd w A. Strauss re sur-rebuttal and small business interests in proposals.		0.25		
4/26/2023	Rscl re SB in equity projects and relevance for surreply test.	0.25	0.5		
5/5/2023	Revision to mt to admit exhs.				0.25
5/8/2023	Confer w staff re declaration to support mt to admit testimony into record.				0.25
5/12/2023	Rev D. Brennan executed declaration for testimony.				0.25
5/17/2023	Rev parties' op briefs.	0.5	0.5		
5/31/2023	Rev other parties' reply briefs.	0.25			
6/23/2023	Analyze ALJ Ruling Cost Effectiveness requesting party cmmt; notes on SBUA interests.	0.25	0.25	0.25	
6/28/2023	Confer w A. Strauss re cost impacts cmmts due July 31.			0.25	
7/31/2023	Rev SBUA cmmts on cost-effectiveness considerations.		0.5		
8/1/2023	Rev other parties' cmmts on cost-effectiveness Qs.		0.75		
8/10/2023	Rev to SBUA reply cmmts.		0.25	0.25	
12/13/2023	Rev parties' reply cmmts on ALJ ruling re Net Value Benefit Tariff Proposal.		0.25		
3/4/2024	Analyze PD.	0.25	0.25		
3/5/2024	Strategy emails w A. Strauss re SBUA cmmts on PD.	0.1	0.15		
3/25/2024	Rev SBUA op cmmts on PD.		0.25	0.25	
6/26/2024	Cnslt w A. Strauss re op cmmts on ALJ ruling.			0.25	
7/9/2024	Rscl re SBUA positions for op cmmts.		0.25	0.5	
7/10/2024	Rev SBUA op cmmts on ALJ Qs.		0.25	0.25	
7/11/2024	Analyze other parties' positions in op cmmts.		0.25	0.5	
7/29/2024	Crrspnd w A. Strauss re the same.			0.25	
7/29/2024	Rev SBUA reply cmmts.			0.5	
7/30/2024	Rev other parties' reply cmmts.		0.25	0.25	
4/2/2025	Rev ALJ ruling re modified green energy programs.			0.25	
4/25/2025	Analyze positions for potential SBUA cmmts on ALJ Ruling re modified CRE and modified Green Tariff programs		0.25	0.25	
4/29/2025	Rev other parties cmmts re the same.			0.5	
5/8/2025	Crrspnd w A. Strauss re SBUA reply cmmts.			0.25	
5/9/2025	Rev other parties' reply cmmts.			0.5	
	Totals:	11	19.55	5.75	1.55

ATTACHMENT 3

Statement of Work for SBUA Contract with E&E Law Corp.

STATEMENT OF WORK

This Statement of Work (SOW) is issued pursuant to the Consultant and Fee Agreement dated on or around April 18, 2025 (Agreement), by and between Small Business Utility Advocates (Client) and E&E Law Corp. (Law Firm) (collectively, the Parties). This SOW relates to the Parties' work in A.22-05-022, *et al.* (Application of Pacific Gas and Electric Company (U 39 E) for Review of the Disadvantaged Communities – Green Tariff, Community Solar Green Tariff and Green Tariff Shared Renewables Programs, and Related Matters) (Proceeding).

The Parties agree that Law Firm is providing professional services to represent Client as an intervenor in the Proceeding before the California Public Utilities Commission (Commission). Pursuant to the Agreement, Law Firm's compensation for services in the proceeding is contingent upon and limited to amounts awarded by the Commission through intervenor compensation, based on Commission-approved market rates. This SOW is contractually binding and further specifies the market rates the Parties intend to seek.

Pursuant to the Agreement, Client will seek, in any intervenor compensation claim, reimbursement for James Birkelund's services as General Counsel at the market rate of \$770 per hour in 2023, \$800 per hour in 2024, \$830 per hour in 2025, and \$860 per hour in 2026, and Ariel Strauss' services as Regulatory Attorney at the market rate of \$465 per hour in 2022, \$510 per hour in 2023, \$530 per hour in 2024, \$550 per hour in 2025, and \$570 per hour in 2026. All requested hourly rates, time, and costs remain subject to review and approval by the Commission in accordance with applicable intervenor compensation statutes, rules, and Commission precedent.

In accordance with the Agreement, any legal fees and costs recovered by Client in this proceeding for work performed by Law Firm shall be paid and disbursed in full to E&E Law Corp. This does not include any compensation awarded for work performed by Client's in-house staff or other non-consultant representatives.

All terms and conditions of the Agreement remain in full force and effect.

IN WITNESS WHEREOF, the Parties hereby execute this Statement of Work:

Client

By: Jennifer Weberski
Jennifer Weberski
Litigation Supervisor
Small Business Utility Advocates
Date: August 17, 2026

E&E Law Corp.

By: James M. Birkelund
James M. Birkelund
Attorney
E&E Law Corp.
Date: August 12, 2026