



FORM A: BLANK NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION

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

02:17 PM

A2606014

Application of Southern California Gas Company (U904G) for Authority, Among Other Things, to Update its Gas Revenue Requirement and Base Rates Effective on January 1, 2028	Application 26-06-014 (Filed June 15, 2026)
And Related Matters.	Application 26-06-015 (Filed June 15, 2026)

**NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION
AND, IF REQUESTED (and ☒ ¹ checked), ADMINISTRATIVE LAW JUDGE'S
RULING ON UTILITY CONSUMERS' ACTION NETWORK'S SHOWING OF
SIGNIFICANT FINANCIAL HARDSHIP**

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

Customer or Eligible Local Government Entity (party intending to claim intervenor compensation): Utility Consumers' Action Network	
Assigned Commissioner: Karen Douglas	Administrative Law Judge: Elizabeth Fox, Sarah R. Thomas
I hereby certify that the information I have set forth in Parts I, II, III and IV of this Notice of Intent is true to my best knowledge, information and belief.	
Signature:	/s/Jane Krikorian
Date: August 21, 2026	Printed Name: Jane Krikorian

¹ DO NOT CHECK THIS BOX if a finding of significant financial hardship is not needed (in cases where there is a valid rebuttable presumption of eligibility (Part III(A)(3)) or significant financial hardship showing has been deferred to the intervenor compensation claim).

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

A. Status as “customer” (see Pub. Util. Code § 1802(b))² The party claims “customer” status because the party is (check one):	Applies (check)
1. A Category 1 customer is an actual customer whose self-interest in the proceeding arises primarily from his/her role as a customer of the utility and, at the same time, the customer must represent the broader interests of at least some other customers. See, for example, D.08-07-019 at 5-10).	☐
2. A Category 2 customer is a representative who has been authorized by actual customers to represent them. Category 2 involves a more formal arrangement where a customer or a group of customers selects a more skilled person to represent the customer’s views in a proceeding. A customer or group of customers may also form or authorize a group to represent them, and the group, in turn, may authorize a representative such as an attorney to represent the group.	☐
3. A Category 3 customer is a formally organized group authorized, by its articles of incorporation or bylaws to represent the interests of residential customers or small commercial customers receiving bundled electric service from an electrical corporation (§1802(b)(1)(C)). Certain environmental groups that represent residential customers with concerns for the environment may also qualify as Category 3 customers, even if the above requirement is not specifically met in the articles or bylaws. See D.98-04-059, footnote at 30.	☒
4. The party’s detailed explanation of the selected customer category. <u>The party’s explanation of its status as a Category 1 customer.</u> A party seeking status as a Category 1 customer must describe the party’s own interest in the proceeding and show how the customer’s participation goes beyond just his/her own self-interest and will benefit other customers. Supporting documents must include a copy of the utility’s bill. <u>The party’s explanation of its status as a Category 2 customer.</u> A party seeking status as a Category 2 customer must identify the residential customer(s) being represented and provide authorization from at least one customer. <u>The party’s explanation of its status as a Category 3 customer.</u> If the party represents residential and small commercial customers receiving bundled electric service from an electrical corporation, it must include in the Notice of Intent either the percentage of group members that are residential ratepayers or the percentage of the members who are receiving bundled electric service from an electrical corporation. Supporting documentation for this customer category must include current copies of the articles of incorporation or bylaws. If current copies of the articles and bylaws have already been filed with the Commission, only a specific	

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

reference (the proceeding's docket number and the date of filing) to such filings needs to be made. <u>Explanation for UCAN's status as a Category 3 customer:</u> UCAN is a 501(c) (3) non-profit public benefit corporation dedicated to protecting and representing the interests of residential and small business customers in San Diego County. UCAN has a forty-two year history of intervening in CPUC proceedings on behalf of ratepayers. UCAN's work also includes helping individuals resolve consumer disputes with utility service providers of electricity, gas, water and telecommunications. UCAN has approximately 10,000 members listed in our membership database, of which approximately 98% are residential customers. In D.98-04-059, the Commission directed intervenors to state in their NOIs which of three customer "categories" they fall within. UCAN is a "group or organization authorized pursuant to its articles of incorporation or bylaws to represent the interests of residential ratepayers." The decision also requires a group such as UCAN to include in their NOI a copy of the authorization in their articles of incorporation to represent residential customers, or to provide a reference to a previous filing (see D.98-04-059, p. 30). UCAN has previously provided to the Commission the relevant portion of our articles of incorporation. An ALJ Ruling filed on June 28, 2005, in A.05-02-019 noted that UCAN is a customer as that term is defined in §1802(b) and is a group or organization authorized by its bylaws or articles of incorporation to represent the interests of residential and small commercial customers (See Ruling, pp. 1-2). UCAN most recently included a copy of our articles of incorporation in a NOI filed in A.17-01-019 on April 3, 2017, (see Attachment 2 of that NOI filing) later consolidated under A.17-01-012. The articles of incorporation have not changed since the time of those earlier submissions.	
Do you have any direct economic interest in outcomes of the proceeding? ³ If "Yes", explain:	☐ Yes ☒ No
B. Conflict of Interest (§ 1802.3)	Check
1. Is the customer a representative of a group representing the interests of small commercial customers who receive bundled electric service from an electrical corporation?	☐ Yes ☒ No
2. If the answer to the above question is "Yes", does the customer have a conflict arising from prior representation before the Commission?	☐ Yes ☐ No
C. Status as an Eligible Local Government Entity (§§1802(d), 1802.4, 1803.1)	

³ See Rule 17.1(f).

The party claims “eligible local government entity” status because the party is a city, county, or city and county that is not a publicly owned public utility that intervenes or participates in a Commission proceeding for the purpose of protecting the health and safety of the residents within the entity’s jurisdiction following a catastrophic material loss suffered by its residents either in significant damage to infrastructure or loss of life and property, or both, as a direct result of public utility infrastructure.	☐ Yes ☒ No
The party’s explanation of its status as an eligible local government entity must include a description of (1) The relevant triggering catastrophic event; (2) The impacts of the triggering catastrophic event on the residents within the entity’s jurisdiction as a result of public utility infrastructure; and (3) The entity’s reason(s) to participate in this proceeding.	
D. Timely Filing of Notice of Intent to Claim Intervenor Compensation (NOI) (§ 1804(a)(1)):	
1. Is the party’s NOI filed within 30 days after a Prehearing Conference? Date of Prehearing Conference: 7/24/2026	☒ Yes ☐ No
2. Is the party’s NOI filed at another time (for example, because no Prehearing Conference was held, the proceeding will take less than 30 days, the schedule did not reasonably allow parties to identify issues within the timeframe normally permitted, or new issues have emerged)?	☐ Yes ☒ No
2a. The party’s description of the reasons for filing its NOI at this other time:	
2b. The party’s information on the proceeding number, date, and decision number for any Commission decision, Commissioner ruling, Administrative Law Judge’s ruling, or other document authorizing the filing of NOI at that other time:	

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

A. Planned Participation (§ 1804(a)(2)(A)):
The party’s statement of the issues on which it plans to participate: UCAN represents the interests of residential and small business ratepayers within the San Diego Gas & Electric (SDG&E) territory, advocating for safe and reliable electricity at affordable rates. In this current General Rate Case Application, SDG&E is asking for \$3.8 billion for its test-year (TY) 2028 to operate its electric and gas systems. UCAN has serious concerns about this amount because it is \$1.1 billion more than its authorized revenue requirement from just four years ago (\$3.8 billion request for 2028 vs. \$2.7 billion authorized for 2024), a 40% increase in just four years. ⁴

⁴ D.24-12-074 at 3.

UCAN plans to intervene in four major areas to identify expense reductions: electric distribution, wildfire mitigation, gas system maintenance, salaries and administrative costs. These areas, in particular distribution spending and wildfire mitigation costs, are continuously cited in affordability reports as the key drivers of escalating rates.⁵

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

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

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

UCAN filed a Protest to the SDG&E GRC TY 2028 Application, participated in a Joint PHC Statement and attended the prehearing conference. UCAN intends to fully participate in the proceeding including working with four experts to submit data requests, provide testimony, attend evidentiary hearings, provide expert witnesses for cross-examination, write briefs and comments on the proposed decision. UCAN's goal is to identify significant cost reductions and provide recommendations to the Commission to protect ratepayers from unreasonable utility spending.

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

Item	Hours	Rate \$	Total \$	#
ATTORNEY, EXPERT, AND ADVOCATE FEES				
Jane Krikorian – Attorney	225	\$525	\$118,125	
Jason Zeller - Attorney	85	\$820	\$69,700	
Tyson Siegle – Expert	150	\$360	\$54,000	
Samuel Golding – Expert	200	\$360	\$72,000	
Karl Pavlovic – Expert	75	\$915	\$68,625	
Subtotal: \$382,450				
OTHER FEES				
Courtney Cook-Sloane	25	\$215	\$5,375	
Subtotal: \$5,375				
COSTS				
Travel if EHs are in person			\$3,000	
Subtotal: \$3,000				
TOTAL ESTIMATE: \$390,825				

⁵ The Public Advocates Office Q2 2026 Electric Rates Report, slide 5; <https://www.publicadvocates.cpuc.ca.gov/-/media/cal-advocates-website/files/press-room/reports-and-analyses/260727-public-advocates-office-q2-2026-electric-rates-report.pdf>

Estimated Budget by Issues:

Issue:	Time:	Budget:
1. Distribution - Electric	35%	\$133,857.50
2. Wildfire Costs	20%	\$76,490
3. Gas System	25%	\$95,612.50
4. Salaries, Admin, Insurance	20%	\$76,490
Total:	100%	\$382,450

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

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

A. The party claims that participation or intervention in this proceeding without an award of fees or costs imposes a significant financial hardship, on the following basis:	Applies (check)
1. The customer cannot afford, without undue hardship, to pay the costs of effective participation, including advocate's fees, expert witness fees, and other reasonable costs of participation. (§ 1802(h))	☐
2. In the case of a group or organization, the economic interest of the Individual members of the group or organization is small in comparison to the costs of effective participation in the proceeding. (§ 1802(h))	☐
3. The eligible local government entities' participation or intervention without an award of fees or costs imposes a significant financial hardship. (§ 1803.1(b).)	☐
4. A § 1802(h) or § 1803.1(b) finding of significant financial hardship in another proceeding, made within one year prior to the commencement of this proceeding, created a rebuttable presumption in this proceeding (§ 1804(b)(1)).	☐
Commission's finding of significant financial hardship made in proceeding number:	
Date of Administrative Law Judge's Ruling (or CPUC Decision) in which the finding of significant financial hardship was made:	

B. The party's explanation of the factual basis for its claim of "significant financial hardship" (§ 1802(h) or § 1803.1(b)) (necessary documentation, if warranted, is attached to the NOI:

UCAN is a nonprofit 501(c)(3) consumer advocacy organization with a 42-year history dedicated to representing the interests of residential customers of SDG&E in Commission proceedings. UCAN has a long history of intervening in CPUC proceedings and has regularly been found to satisfy the § 1802(g) "significant financial hardship" requirement. The last such finding was made in a ruling for R.23-12-008 on June 18, 2025.

UCAN has approximately 10,000 members listed in our membership database, of which approximately 98% are residential customers. At the end of 2025, UCAN mailed almost 5,000 individuals annual membership information and received contributions from over 180 individuals. The comparison test requires that the economic interest of the individual members of the group or organization be small in comparison to the costs of UCAN's effective participation in this proceeding. UCAN notes that the cost of UCAN's participation in Commission proceedings substantially outweighs the potential economic benefit to the individual members we represent. UCAN members are residential customers of SDG&E whose individual interests in this proceeding are very small relative to the costs of our effective participation, and therefore, UCAN members will not see financial benefits that exceed the costs of our participation.

As noted in UCAN's Articles of Incorporation (see section IV) all net income that UCAN receives will be irrevocably dedicated for a charitable purpose:

"The property of this corporation is irrevocably dedicated to charitable purposes and no part of the net income or assets of this organization shall ever inure to the benefit of any private persons".

UCAN also notes how valuable intervenor compensation is and how without it our ability to represent SDG&E residential ratepayers in Commission proceedings would be significantly impaired. UCAN expects to rely on intervenor compensation awards for the bulk of its operating income in the next year. Without being eligible for intervenor compensation UCAN would not have the ability to effectively participate in CPUC proceedings.

For FY21/22, UCAN's income was \$429,803 with \$413,332 from Intervenor Compensation, and expenses of \$636,057 for a negative net income of (\$206,253). At the end of FY21/21 UCAN's Assets were \$122,72 with Liabilities totaling \$57,389 for a total Equity of \$65,340.

For FY22/23, UCAN's income was \$658,121 with \$638,206 from Intervenor Compensation, and expenses of \$474,508 for a net income of \$183,612. At the end of FY 22/23 UCAN's Assets were \$287,824 with Liabilities totaling \$46,737 for a total Equity of \$241,088.

For FY23/24, UCAN's income was \$1,227,054 with \$1,207,999 from Intervenor Compensation, and expenses of \$886,331 for a net income of \$340,722. At the end of FY 23/24 UCAN's Assets were \$595,773 with Liabilities totaling \$25,664 for a total Equity of \$570,108.

For FY24/25, UCAN's income was \$326,497 with \$313,371 from Intervenor Compensation, and expenses of \$573,307 for a net income of (\$246,810). At the end of FY 24/25 UCAN's Assets were \$369,807 with Liabilities totaling \$45,771 for a total Equity of \$323,274.

For FY25/26, UCAN's income was \$1,255,793 with \$1,244,487 from Intervenor Compensation, and expenses of \$1,174,397 for a net income of \$81,395. At the end of FY 25/26 UCAN's Assets were \$414,585 with Liabilities totaling \$7,914 for a total Equity of \$406,670.

The Commission, for the past 42 years, has found that UCAN qualified for a finding of significant financial hardship given that the economic interest of UCAN's individual members is small in comparison to the costs of our effective participation. What was true for the last 40 years remains true today. Given the showing in this NOI, UCAN believes that we have satisfied the requirements found in Public Utilities Code section 1802 (g) and we therefore ask for a finding of "significant financial hardship."

PART IV: ATTACHMENTS DOCUMENTING SPECIFIC ASSERTIONS MADE IN THIS NOTICE

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

Attachment No.	Description
1	Certificate of Service

ADMINISTRATIVE LAW JUDGE RULING⁶ **(Administrative Law Judge completes)**

	Check all that apply
1. The Notice of Intent (NOI) is rejected for the following reasons:	☐
a. The NOI has not demonstrated the party's status as a "customer" or an "eligible local government entity" for the following reason(s):	☐
b. The NOI has not demonstrated that the NOI was timely filed (Part I(B)) for the following reason(s):	☐

⁶ A Ruling needs not be issued unless: (a) the NOI is deficient; (b) the Administrative Law Judge desires to address specific issues raised by the NOI (to point out similar positions, areas of potential duplication in showings, unrealistic expectations for compensation, or other matters that may affect the customer or eligible local government entity's Intervenor Compensation Claim); or (c) the NOI has included a claim of "significant financial hardship" that requires a finding under § 1802(h).

c. The NOI has not adequately described the scope of anticipated participation (Part II, above) for the following reason(s):	☐
2. The NOI has demonstrated significant financial hardship for the reasons set forth in Part III of the NOI (above).	☐
3. The NOI has not demonstrated significant financial hardship for the following reason(s):	☐
4. The Administrative Law Judge provides the following additional guidance (see § 1804(b)(2)):	☐

IT IS RULED that:

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

Dated _____, at San Francisco, California.

Administrative Law Judge