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

Order Instituting Rulemaking to Continue
Oversight of Electric Integrated Resource
Planning and Procurement Processes.

Rulemaking 25-06-019

**SUPPLEMENT TO THE NOTICE OF INTENT TO CLAIM INTERVENOR
COMPENSATION**

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August 31, 2026

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I. INTRODUCTION

Pursuant to the Administrative Law Judges' (ALJ) Ruling issued on July 30, 2026 (Ruling), Small Business Utility Advocates (SBUA) respectfully submits this response providing the additional information requested regarding its notice of intent to claim intervenor compensation.¹

II. RESPONSE TO SPECIFIC QUESTIONS

A. Organizational Documents

The Ruling asks SBUA to provide its most recent bylaws and articles of incorporation and SBUA's Form 990 filings for the most recent three (3) years. Attached as Exhibit A and Exhibit B are SBUA's most recent articles of incorporation and bylaws. Attached as Exhibit C are SBUA's most recent three Form 990 filings (2023-2025). SBUA hires accountants at LWA LLP to compile and file its tax returns. Based on revenue received through the end of August 2026, SBUA's revenue is approximately \$787,997 on an annualized basis.

¹ The 30-day response deadline fell on Saturday, August 29, 2026; under the California Public Utilities Commission's (Commission) Rule 1.15, the deadline extends to Monday, August 31, 2026.

B. California Members

At the time SBUA began participating in this proceeding, SBUA had 171 California members: 169 businesses enrolled as small business members and two nonprofit organizations. SBUA's membership outreach focuses on small businesses located in investor-owned utilities' service territories and receiving bundled utility service. SBUA's membership records are based on each business member's representation, at enrollment, that it qualified as a small business. SBUA periodically reviews its membership and removes businesses when changes in their status render them ineligible. Based on this process, SBUA review indicates that 169 of its 171 California members at the outset of this proceeding qualified as small businesses. The two nonprofit organizational members are described separately below.

Based on SBUA's membership records, 52 of the 169 businesses received bundled electric service from Pacific Gas and Electric Company; 39 from Southern California Edison Company; 30 from San Diego Gas & Electric Company; 40 from Liberty Utilities; six from PacifiCorp; and two from Bear Valley Electric Service. Collectively, 121 businesses received service from one of California's three largest investor-owned electric utilities.

SBUA's current membership represents a broad array of small businesses, most of which operate in neighborhood commercial districts, retail centers, and local shopping areas. These members include, for example, retail businesses, such as boutiques, clothing stores, specialty shops, and small convenience stores; food and hospitality businesses, such as coffee shops, cafés, and small bakeries; personal care and wellness service providers, such as hair salons and barber shops; arts and galleries; professional and business services, such as real estate agents and consultants; and other small-business vendors.

Related to the energy sector, one SBUA member provides energy consulting services to architects, designers, builders, and homeowners seeking to comply with California Energy Standards related to residential construction and permitting. Another SBUA member supplies traffic signal equipment to public agencies, including municipalities, and to electrical contractors. Based on its current review, SBUA is not aware of other members, beyond these two, that provide services targeted to utilities, energy companies, or other participants in energy markets.

More generally, SBUA has advocated in Commission proceedings, including utility general rate cases, for supplier diversity initiatives and utility spending policies, incentives, and programs that expand contracting opportunities for small businesses. Most recently, in Pacific Gas and Electric Company' (PG&E) pending 2027 general rate case, SBUA negotiated a proposed settlement, still subject to Commission approval, under which PG&E would explore initiatives to increase its use of small-business suppliers, assist small businesses in navigating the bidding process and overcoming barriers to entry, and report in its next general rate case on direct spending with qualified small businesses. *See* A.25-05-009, Joint Motion of Pacific Gas and Electric Company and Small Business Utility Advocates for Adoption of Settlement Agreement, Aug. 12, 2026, Exh. A, §§ 4.1–4.2 (Contracting Opportunities for Small Businesses). In addition, SBUA shares bidding opportunities through its website, including opportunities it receives from PG&E, Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E); SBUA attends utility supplier-diversity events to remain informed about procurement programs and contracting opportunities relevant to small businesses; and SBUA has held listening sessions with small businesses outside its membership

to better understand the barriers and challenges they face in securing utility contracts and subcontracts and to inform SBUA's advocacy on those issues.

SBUA's mission is to represent the small business ratepayer community as a whole, rather than to advocate for individual members or their particular economic interests. Consistent with that mission, SBUA's advocacy related to supplier diversity and contracting opportunities is not undertaken on behalf of any individual member, and SBUA does not assist or participate in any small businesses' individual efforts to obtain contracts with utilities or other entities involved in the energy sector.

C. Employees, Board Directors, Volunteers

Employee Britt Marra is SBUA's Executive Director and serves on its Board of Directors. She manages SBUA's day-to-day operations, staff and payroll, organizational strategy, budgeting, and regulatory priorities. She leads statewide membership development, education, and outreach; engages with small business owners and organizations; serves as liaison to SBUA's attorneys and experts; and represents SBUA in lobbying, media, and other advocacy efforts. Ms. Marra also consults with counsel on strategy in Commission proceedings, assists with litigation and filings, and reviews intervenor compensation requests. In addition, she serves on the board of the National Small Business Utility Council, a nonprofit that advocates before the Oregon Public Utility Commission and Washington Utilities and Transportation Commission, and consults with Small Business Utility Alliance, a sister organization that intervenes before the Ontario Energy Board.

Employee Jennifer Weberski is SBUA's Litigation Supervisor. She works on SBUA's litigation and advocacy at the Commission across a wide range of cases. Her activities include case analysis, development of positions, drafting of briefs and pleadings, attending hearings,

engaging in settlement negotiations, and otherwise participating in Commission proceedings. She often supervises and advises other attorneys on hearing and discovery strategy.²

Employee Ted Howard is SBUA's Senior Energy Policy Analyst. He provides policy and technical analysis concerning energy, climate, telecommunications and other utility issues and assists in developing SBUA's positions on behalf of small business ratepayers. Mr. Howard submits testimony on behalf of SBUA and often engages in working groups and webinars related to SBUA cases. He spends significant time on energy efficiency cases, including participating for many years in the California Energy Efficiency Coordinating Committee (CAEECC) and Energy Efficiency Procurement Review Group (EE-PRG) matters.

Board Member Jesse Honig serves as a director and SBUA's Treasurer. He participates in Board governance and oversight, including review of SBUA's revenue, significant expenditures, and major organizational decisions. As Treasurer, he also reviews final intervenor compensation awards, reviews and approves payments to outside consultants, assists in processing those payments, and helps oversee SBUA's financial practices.

Board Member Nicholas Saloma serves as a director and SBUA's Secretary. He participates in Board governance and oversight, including participating of major organizational decisions. As Secretary, he performs duties associated with finalizing and signing off on Board minutes, resolutions, and the maintenance of SBUA's corporate records.

Board Member Christy McCreath serves as a director and advises SBUA on communications, outreach, organizational visibility, and engagement with small business

² Ms. Weberski gave notice in August of her resignation in September 2026. SBUA is actively interviewing candidates for additional in-house attorney and expert positions.

stakeholders. Before joining the Board, she volunteered on a grant funded project supporting SBUA's marketing and outreach.

Mr. Honig, Mr. Saloma, and Ms. McCreath serve on the Board in volunteer capacities.

In addition, Namya Ramalingam serves as SBUA's Policy Communications Associate in a volunteer capacity. Ms. Ramalingam supports SBUA's public facing communications, stakeholder engagement, and outreach to small business customers and other interested parties. Her work includes researching and drafting educational and policy related content, managing SBUA's social media communications, and supporting efforts to engage small businesses on energy and utility issues relevant to SBUA's mission and participation before the Commission.

Volunteers have played a central role in SBUA's formation and continued participation in Commission proceedings. SBUA began in 2011, before its incorporation, as a project involving former California Public Utilities Commissioner John Bohn, multiple attorneys, and several law students at UC Law San Francisco (formerly UC Hastings), all of whom volunteered their time. SBUA's current Executive Director likewise volunteered substantial time from 2013 through 2022 before becoming a paid employee.³ Volunteers continue to contribute through service on SBUA's Board and by supporting its policy, communications, and outreach activities.

D. Organizational Members

Nonprofit Members. SBUA's organizational members at the time this proceeding commenced included two nonprofit organizations: the National Association of Minority Companies Inc. (NAMC), based in San Diego, California, and the California Small Business

³ In 2022, for example, the Executive Director averaged approximately 20 hours per week of work entirely on a volunteer basis. *See* Response of SBUA to ALJ's Ruling Regarding Intervenor Compensation Claim in A.24-04-005, Dec. 22, 2025 (SBUA Response), Exh. A (2022 Form 990). SBUA endeavors to maintain competitive salaries; however, compensation, including for the Executive Director, varies significantly with SBUA's projected budget and revenue.

Association, based in Los Angeles, California. NAMC has since ceased its operations in 2026.⁴ Neither organization had, or currently has, a direct economic interest in the outcome of this proceeding that is comparable to the substantial cost of participating in the case.⁵ Rather, their interests arise from their respective general missions of representing and supporting minority-owned and small businesses. Any economic benefit these nonprofits may receive from SBUA's participation in this proceeding would therefore be indirect and only to the extent there are any benefits to their members or constituencies.

SBUA occasionally reaches out to, or receives and considers membership requests from, other nonprofit organizations. However, SBUA's primary membership focus is small business ratepayers.

These nonprofit members did not and do not have leadership or decision-making roles in SBUA's litigation. SBUA does not advocate for any specific positions on behalf of these entities or seek outcomes intended to provide any of them with any direct economic benefits.

Advisory Committee. SBUA presently has three advisors on its Advisory Committee and is seeking to expand the Committee by adding individuals with relevant policy or energy expertise and a strong interest in Commission matters and utility issues affecting small businesses. The Committee's purpose is to provide SBUA with feedback and insight, including being open to broader input from chambers of commerce and other organizations representing or

⁴There are larger entities with similar names, such as the National Association of Minority Contractors, that SBUA is not affiliated with.

⁵ SBUA understands that NAMC previously sought funding from California investor-owned utilities, including SCE, and received occasional, relatively small contract awards. SBUA was not involved in those efforts, and NAMC never requested that SBUA advocate or otherwise act directly in support of them.

serving small businesses. The Committee has no legal, governing, or decision-making authority over SBUA.

The current Committee includes: (1) Frank Montes. Mr. Montes serves as Chair of the Hispanic Coalition of Small Businesses, a role through which he has gained broad insight into issues affecting minority-owned small businesses. He is also the founder of Inland Body and Paint Center, serves on the boards of Farmworker Justice and the High Desert Hispanic Chamber of Commerce, and is a past Chair of the California Hispanic Chambers of Commerce; (2) Jarrod Koch. Mr. Koch is CEO, Managing Partner, and Co-Founder of DivergeIT, a managed information technology and cybersecurity services company based; and (3) Yusuf Arif. Mr. Arif is a founding partner of Arif International Corp., a small business providing engineering, industrial supply, information technology, software, permitting, architectural, structural, solar photovoltaic, and material supply services. The company provides products and services to utilities throughout the United States and bids on contracts. His experience provides practical insight into utility procurement and contracting issues affecting small businesses.

Committee participants are required to disclose any relevant relationships and actual or potential conflicts of interest to SBUA. Except for Mr. Arif, SBUA is not aware that any other participant, directly or through an affiliated business, currently provides services to an entity participating in or preparing to enter the energy, water, transportation, or telecommunications markets.

E. Outside Consultants

In early 2026, SBUA migrated its website to a new platform and created a new “Team and Partners” section to help describe the role, expertise, and importance of its outside

consultants.⁶ The revised presentation reflects SBUA's longstanding relationships with many of its outside consultants; it does not itself mark a structural reorganization. The outside attorneys and experts SBUA works with are independent professionals that advise SBUA, primarily in litigation cases, but do not hold organizational decision-making authority. Many also serve clients in the energy, water, transportation, telecommunications, and related sectors.

Expert Matt Sheriff, through Palos Verdes Advisors, provides financial and regulatory analysis in Commission proceedings, including also on behalf of The Utility Reform Network, and previously held regulatory affairs and corporate finance positions at SCE from 2007 through 2024.

Expert Michael Brown previously worked for PG&E and California public utilities, including in program management, electric resource, and project analysis roles. He also currently works with Sierra Forestry Consulting in northern California, which has contracts with PG&E, but otherwise works only with SBUA in the energy field.

Expert Maureen Reno, through Reno Energy Consulting Services, in addition to working with SBUA, provides rate-case, market, and regulatory analysis involving electric, gas, and water utilities for governmental agencies, consumer advocates, local governments, and other clients.

Experts Theodore Love and Francis Wyatt, through Green Energy Economics Group, provide energy efficiency and distributed energy resource expert work to SBUA and also other

⁶ In fall 2025, malware attacks twice took SBUA's prior website offline. Because most content dating back to 2012 could not be recovered, SBUA migrated to a new platform and rebuilt its website. SBUA's mission and advocacy remained unchanged. An incomplete archive of earlier website materials remains available through the Internet Archive's Wayback Machine at <https://web.archive.org/web/20170322064101/http://utilityadvocates.org/category/uncategorized/> (last checked Aug. 28, 2026).

entities including the Massachusetts Attorney General, Maryland Office of People’s Counsel, Nova Scotia Consumer Advocate, UGI Utilities, Philadelphia Gas Works, PSE&G, and Columbia Gas, and perform work for Small Business Utility Alliance on matters at the Ontario Energy Board.

Expert William Steele, through Bill Steele & Associates, provides ratemaking and regulatory advisory services to SBUA and in the energy sectors, with clients including the New Mexico Department of Justice Consumer Advocate Division, the Washington Utilities and Transportation Commission, Colorado Office of the Utility Consumer Advocate, Southwest Power Pool, and water and electric utilities.

Expert James Wilson, through Wilson Energy Economics, provides economic and regulatory consulting regarding wholesale electricity and natural-gas markets and related matters to SBUA but also utilities, other consumer advocates, environmental organizations, and other market participants.

SBUA’s outside regulatory attorneys, including James Birkelund, Itzel Berrio Hayward, Ariel Strauss, and Luke May, practice through Energy & Environmental Law Corp. (“E&E Law”), an independent law firm. Related to energy matters, Mr. Birkelund is currently assisting a law firm, Elson Advocacy, with advice representing Small Business Utility Alliance intervening at the Ontario Energy Board. Mr. May volunteers as a member of the Board of Directors for National Small Business Utility Council. Ms. Hayward previously represented Greenlining Institute in proceedings before the Commission but does not currently do so.

Over the years, SBUA’s outside consultants have consistently brought substantial professional experience and specialized expertise to its Commission advocacy, contributing to outcomes that SBUA submits provide substantial benefits to small business ratepayers.

III. CONCLUSION

SBUA appreciates the opportunity to provide this additional information and respectfully requests that the Commission find, pursuant to Public Utilities Code section 1802(h), that SBUA's participation without an award of fees or costs would impose significant financial hardship and confirm SBUA's eligibility to seek compensation for the reasonable costs of its participation, including outside counsel and expert services.

Dated: August 31, 2026

Respectfully Submitted,

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