BEFORE THE PUBLIC UTILITIES COMMISSION OF

THE STATE OF CALIFORNIA

FILED
09/09/26
11:23 AM
R2204003

Order Instituting Rulemaking to review the existing guiding framework set forth in Decision 99-10-064 (consistent with the Public Water System Investment and Consolidation Act of 1997) regarding acquisitions involving water utilities under the Commission's jurisdiction.	Rulemaking 22-04-003 (Filed April 7, 2022)

CENTER FOR ACCESSIBLE TECHNOLOGY'S MOTION TO ACCEPT AMENDED REQUEST FOR COMPENSATION

Melissa W. Kasnitz
Center for Accessible Technology
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September 9, 2026

I. INTRODUCTION

In accordance with Rule 11 of the Commission's Rules of Practice and Procedure, Center for Accessible Technology (CforAT) files this motion requesting permission to file an amended Request for Compensation.

II. DISCUSSION

On September 8, 2026, at approximately 10:46 AM, CforAT timely filed a Request for Compensation for our substantial contributions to D.26-07-031, issued in this proceeding on July 10, 2026. The Commission's Docket Office accepted the filing at 12:42 PM. Shortly after filing, counsel for CforAT realized that we had inadvertently filed a non-final draft of the document, which omitted the written justification for the rate requested for CforAT Staff Attorney Rachel Sweetnam.

At 1:06 pm, CforAT sent an email to the docket office asking for the submitted document to be rejected so that we could replace it with the correct final version of the document. The email noted that reason for the request was that "the justification for Ms. Sweetnam's new rate was omitted." No response was issued from the docket office on September 8. On September 9, at 9:11 am, CforAT sent an additional email, again asking for the incorrect version of the document to be rejected so we could file the final version. At 9:21 am, the Docket Office responded saying that the rejection request was not possible because the document had already been accepted for filing when the initial request for rejection was sent.

A copy of the email chain setting out this sequence of events is attached as Exhibit A to this motion.

CforAT promptly realized our error in filing a non-final version of the document and took immediate steps to try to remedy it. No party will be prejudiced if CforAT is allowed to file an amended (final) version of our Request for Compensation that includes a rate justification for Ms. Sweetnam. A copy of the amended Compensation Request that we are seeking to file is attached to this Motion as Exhibit B. Other than the inclusion of the rate justification, there are no differences between the filed document and the amended document.

III. CONCLUSION

CforAT apologizes for the error in filing a non-final version of our request and respectfully requests permission to correct the error.

Respectfully submitted,
September 9, 2026

/s/ Melissa W. Kasnitz
MELISSA W. KASNITZ

Center for Accessible Technology
3075 Adeline Street, Suite 220
Berkeley, CA 94703
Phone: 510-841-3224
Fax: 510-841-7936
Email: service@c4at.org

Exhibit A

RE: [EXTERNAL] FW: Please reject receipt_0000237322 Today at 9:21 AM

You don't often get email from michael.oliveros@cpuc.ca.gov. Learn why this is important

Good Morning,

Your rejection request is not possible.

Receipt 0000237322 was already formally filed on 9/8/26 at 12:30 PM when your request for it to be rejected was received on 9/8/26 at 1:06 PM.

Regards.

Michael Oliveros (he,him,his)
Legal Support Supervisor II
California Public Utilities Commission
Administrative Law Judge Division
michael.oliveros@cpuc.ca.gov

From: eFile Help <Efile-Help@cpuc.ca.gov>
Sent: Wednesday, September 9, 2026 9:14 AM
To: ALJ Docket Office <ALJ_Docket_Office@cpuc.ca.gov>
Subject: FW: [EXTERNAL] FW: Please reject receipt_0000237322

From: Kate Woodford <kwoodford@c4at.org>
Sent: Wednesday, September 9, 2026 9:11:03 AM (UTC-08:00) Pacific Time (US & Canada)
To: eFile Help <Efile-Help@cpuc.ca.gov>
Subject: [EXTERNAL] FW: Please reject receipt_0000237322

Good morning.

Yesterday, we requested you to reject receipt 0000237322.

We filed an incorrect version of the main document. Please advise if this is not possible.

Thank you

Kate Woodford
Center for Accessible Technology
3075 Adeline Street
Suite 220
Berkeley, CA 94703
(510) 841-3224
Please note that our domain name has changed. All email addresses now end in c4at.org.

From: Kate Woodford <kwoodford@c4at.org>
Date: Tuesday, September 8, 2026 at 1:06 PM
To: efile-help@cpuc.ca.gov <efile-help@cpuc.ca.gov>
Subject: Please reject receipt_0000237322

Please reject receipt_0000237322

The justification for Ms. Sweetnam's new rate was omitted.

Thank you.

Kate Woodford
Center for Accessible Technology
3075 Adeline Street
Suite 220
Berkeley, CA 94703
(510) 841-3224
Please note that our domain name has changed. All email addresses now end in c4at.org.

Exhibit B

Decision _______________

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to review the existing guiding framework set forth in Decision 99-10-064 (consistent with the Public Water System Investment and Consolidation Act of 1997) regarding acquisitions involving water utilities under the Commission's jurisdiction.	Rulemaking 22-04-003 (Filed April 7, 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 (CforAT)		**For contribution to Decision** (D.) 26-07-031
Claimed: ***$ 104,334.00***		**Awarded: $**
Assigned Commissioner: Darcie L. Houck		**Assigned ALJ(s):** Gerald F. Kelly
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: September 8, 2026	**Submitted by:**	**Paul Goodman**

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

A. Brief description of Decision:	Decision 26-07-031 (the Final Decision) adopts comprehensive reforms to the existing water utility acquisitions framework. These changes modernize the process for reviewing and approving acquisitions of water systems, with a focus on prioritizing failing at-risk, and potentially at-risk systems, safeguarding ratepayer interests, and ensuring transparency. The updated framework aligns policy with the Safe Drinking Water Act of 2021 and the State Water Resources Control Board's (SWRCB) Safe Affordable Funding for Equity and Resilience Program.

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812[1]:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	8/5/2022	
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	9/1/2022	
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:	See comment below	
6. Date of ALJ ruling:	See comment below	
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:	See comment below	
9. Date of ALJ ruling:	See comment below	
10. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
11. Identify Final Decision:	D.26-07-031	
12. Date of issuance of Final Order or Decision:	7/10/2026	
13. File date of compensation request:	September 8, 2026	
14. Was the request for compensation timely?		

C. Additional Comments on Part I: ***<u>(use line reference # as appropriate)</u>***

#	Intervenor's Comment(s)	CPUC Discussion
	At all times since CforAT began our representation of customers with disabilities and medical needs before the Commission, we have been found to be eligible for intervenor compensation. At the time this proceeding was initiated, in April of 2022, CforAT's then-current ruling establishing eligible	

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

#	Intervenor's Comment(s)	CPUC Discussion
	customer status and significant financial hardship was issued on 11/8/2021 in R.21-06-017. Our most current finding of eligibility and financial hardship was issued on 6/3/2026 in R.25-04-010.	

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 and Overview of Participation: This proceeding was opened to improve the process for water district acquisitions in California and specifically to develop a framework to better guide the Commission in reviewing water acquisitions for regulated water utilities. CforAT represents utility customers with disabilities and medical needs, who have a strong interest in ensuring access to clean water to protect their health and safety, and who are also disproportionately low income, which gives them heightened interest in the affordability impacts of water acquisitions. On behalf of our constituency, CforAT participated actively in this proceeding, attending the four scheduled workshops and commenting on the associated workshop reports, and commenting on the subsequent Water Division Staff Proposal that was developed with	This background and overview 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. The Final Decision's general description of CforAT's input on the Staff Proposal is at page 14 of the Final Decision.	

consideration of prior stakeholder input. As noted in the Final Decision, CforAT generally supported the Staff Proposal "with a focus on protecting ratepayers – particularly in vulnerable communities, while ensuring fair, just and reasonable rates." Final Decision at p. 14. CforAT's substantive filings in this proceeding included the following: Reply Comments on OIR, filed June 17, 2022; Comments on Workshop 1 Report. filed February 27, 2023; Comments on Workshop 2 Report, filed July 14, 2023; Comments on Workshop 3 Report (jointly with Rural Community Assistance Corporation and Union of Concerned Scientists), filed on October 4, 2023; Reply Comments on Workshop 3 Report (jointly with Rural Community Assistance Corporation and Union of Concerned Scientists), filed on October 11, 2023; Comments on Workshop 4 Report, filed on April 3, 2024; Comments on Water Division Staff Proposal, filed on January 31, 2025; Reply Comments on Water Division Staff Proposal, filed on February 7, 2025;		

Reply Comments on Proposed Decision, filed on June 23, 2026.		
Legislative Intent and need for a revised Framework As summarized in the Final Decision, CforAT strongly opposed misrepresentations by the water IOUs about the need for a revised acquisitions framework, including legislative intent and regulatory obligations related to water system acquisitions. Reply Comments on Water Division Staff Proposal at pp. 1-2, referenced in Final Decision at p. 25. CforAT supported the goals of the Staff Proposal "to prioritize acquisitions that serve the public good, particularly in vulnerable communities," and ensure that "water system consolidations are conducted under a regulatory framework that balances utility sustainability with customer protection, fairness, and long-term affordability. Reply Comments on Water Division Staff Proposal at pp. 2-8, Final Decision at pp. 26-27.	Consistent with CforAT's recommendations and emphasis on the need for a revised framework, the Final Decision comprehensively updated the existing acquisitions framework to prioritize acquisitions involving failing, at-risk, or potentially at-risk systems, align policy with the Safe Drinking Water Act of 2021 and SWRCB's program, improve transparency, and enhance protections for ratepayers. Final Decision at pp. 31-32, 38-39, 42, 55-59, 63-64.	
Prioritizing Acquisitions of failing, at-risk, and potentially at-risk water systems. CforAT supported the Staff Proposal's focus on prioritizing acquisitions of failing, at-risk, and potentially at-risk water systems and efforts to redirect incentives to systems with the greatest need. Comments on Water Division Staff Proposal at pp. 1-2, referenced in Final Decision at p. 14.	Consistent with CforAT's recommendations, the Commission limited the use of memorandum accounts to failing, at-risk, and potentially at-risk systems in order to incentivize utility resources to systems with the greatest need. Final Decision at pp. 33, 35-36.	

CforAT opposed IOUs' arguments to preserve the status quo and explained that the existing framework has not achieved the Commission's goal of reducing the number of failed and failing water systems and that revisions are needed to prioritize acquisition of failed and failing water systems. Reply Comments on Water Division Staff Proposal at p. 2, referenced in Final Decision at pp. 25-27.	Consistent with CforAT's comments, the Commission rejected arguments from utilities seeking a broad application of memorandum accounts as the utilities failed to demonstrate clear benefits to the public or ratepayers. Final Decision at p. 36. Consistent with CforAT's recommendations, the Commission concluded that it is reasonable to prioritize acquisitions involving failing, at-risk, or potentially at-risk systems. Final Decision at p. 89 COL 1.	
Incentives, including use of Memorandum Accounts CforAT highlighted that the utilities have historically focused on stable systems and need stronger regulatory incentives to acquire distressed systems. CforAT supported the Staff Proposal's recommendation to restrict memorandum accounts to acquisitions of failing, at-risk, and potentially at-risk systems, to ensure that there is incentive to deploy utility resources where they are most needed. CforAT also supported the Staff Proposal's introduction of a new incentive to prioritize acquisitions of failing or at-risk water systems, in order to respond to troubled systems and align acquisitions with public interest goals. Comments on Water Division Staff Proposal at pp. 1-3, referenced in Final Decision at p. 14. CforAT supported the Staff Proposal's revision to disallow memorandum accounts for acquisitions of water systems that are neither failing nor at-risk and instead require acquiring companies to	 Consistent with CforAT's recommendations, the Commission agreed that memorandum accounts should be limited to acquisitions of failing, at-risk, and potentially at-risk systems to incentivize the use of utility resources in vulnerable areas where they are most needed. Final Decision at pp. 32-33. Consistent with CforAT's recommendations, the Commission adopted the Staff Proposal's recommendation to limit the use of memorandum accounts to acquisitions involving failing, at-risk, and potentially at-risk water systems. Consistent with	

forecast acquisition costs in GRC applications instead of passing them onto ratepayers after the fact. CforAT noted that this requirement will increase transparency and opposed CWA's argument that memorandum accounts should be allowed for transaction costs. Reply Comments on Water Division Staff Proposal at pp. 6-7, referenced in Final Decision at p. 26.	CforAT's reasoning, the Commission agreed that limiting memorandum accounts will incentivize utilities to target priority systems and increase transparency by requiring utilities to forecast costs for not-at-risk systems through the GRC process. As in CforAT's comments, the Commission rejected CWA's arguments for broader use of memorandum accounts. Final Decision at pp. 35-36.	
Regulation of acquisition premiums CforAT supported strengthening the Commission's authority to regulate acquisition premiums, advocating that IOUs should be required to justify any markup before it can be included in rates. For valuation methods, CforAT supported using both FMV and RCNLD, requiring disclosure of system liabilities, and enabling alternative valuation proposals. CforAT also supported Water Division's authority to request a second valuation. CforAT supported a Pennsylvania-style third-party appraisal process and analysis of historical acquisition costs per connection to prevent inflated pricing. Comments on Water Division Staff Proposal at pp. 3-4, referenced in Final Decision at pp. 14, 37, 43, 44. CforAT opposed the IOUs' use of a self-serving definition of FMV, especially where pricing fails to account for future costs such as infrastructure repairs and regulatory compliance. CforAT endorsed the Staff Proposal's recommendations on Valuation Methods. Reply Comments on Water Division	Consistent with CforAT's recommendations, the Final Decision affirmed the Commission's authority to include all or part of the acquisition premium in the rate base and emphasized the acquiring utility's burden to justify the inclusion of any part of the premium in the rate base. The Commission articulated the need for strict proof requirements and its discretionary powers to ensure that acquisitions safeguard consumer interests and foster responsible financial planning. Final Decision at pp. 37-39. Consistent with CforAT's recommendations, the Commission adopted the Staff Proposal's recommendations to require the acquiring utility to provide valuations of both FMV and RCNLD to promote transparency and accountability and ensure a comprehensive assessment of the system's worth. Consistent with CforAT's recommendations, the Commission required the acquiring IOU to provide details of liabilities of the acquired system. Consistent with CforAT's recommendations, the Commission determined that parties other than the acquiring utility may present alternative valuation proposals and that Water Division may request a second valuation. Final Decision at pp. 41-42.	

Staff Proposal at pp. 3-4, referenced in Final Decision at p. 26. CforAT supported the Staff Proposal's use of multiple valuation methods, including reproduction cost, book value, and third-party appraisals, in order to achieve a more accurate and balanced assessment of acquisition costs. Reply Comments on Water Division Staff Proposal at pp. 5-6, referenced in Final Decision at p. 26.	While the Commission declined to require mandatory third-party appraisals as supported by CforAT, it nevertheless considered this issue and CforAT's input, so CforAT enhanced the Commission's deliberation. Final Decision at pp. 42-43. While the Commission declined to adopt a requirement for an analysis of the purchase price-per-connection as supported by CforAT, it nevertheless considered this issue and CforAT's input before determining that additional work is needed on this proposal. Therefore, CforAT enhanced the Commission's deliberation. Final Decision at pp. 43-46.	
Gain on Sale Rules CforAT supported the Staff Proposal's recommendations regarding changes to the gain on sale rules in order to appropriately allocate the financial outcomes of acquisitions between the IOUs and ratepayers and promote transparency. Reply Comments on Water Division Staff Proposal at p. 7, referenced in Final Decision at p. 26.	While the Commission did not adopt CforAT's recommendation to adopt the suggested changes to the gain on sale rules, it considered CforAT's input on this issue and overall emphasis on keeping rates affordable. Gain on sale final decision pp. 26, 46-49. Therefore, CforAT's input enhanced the Commission's deliberation.	
Water Rights CforAT supported the Staff Proposal's recommendation to include water rights as non-depreciable assets in the rate base in order to avoid the risk	Consistent with CforAT's recommendations, the Commission adopted the Staff Proposal's suggested changes to water rights with clarifications, finding it reasonable to	

of double-counting assets and protect ratepayers from unnecessary costs. Reply Comments on Water Division Staff Proposal at p. 8, referenced in Final Decision at pp. 26, 50.	treat water rights as non-depreciable assets included in the rate base in order to increase transparency and protect consumers from excessive charges. Final Decision at pp. 51-52.	
Enhanced transparency for ratepayers (existing and acquired customers) CforAT strongly supported enhanced ratepayer impact transparency. CforAT advocated that any application for an acquisition should require individual rate impact analyses for both acquiring and acquired companies and supported the Staff Proposal's recommendation for rate impact analyses. Comments on Water Division Staff Proposal at pp. 4-5, referenced in Final Decision at pp. 15, 54, 57. CforAT supported the ratepayer impact analysis requirement to increase transparency, ensure that applicants identify and assume the risks of inaccurate forecasts, and ensure that any rate increases are just and reasonable. Reply Comments on Water Division Staff Proposal at p. 8, referenced in Final Decision at p. 26. CforAT raised concerns about insufficient consideration of ratepayer impacts by acquiring companies and the lack of opportunity for ratepayers to participate in the acquisition process. CforAT supported the Staff Proposal's public notice requirements, which would address these concerns by working to increase community input and providing the Commission	 Consistent with CforAT's recommendations for ratepayer impact analyses for both new and existing customers, the Commission adopted a ratepayer impact analysis for both new and existing customers for all water acquisitions. Consistent with CforAT's advocacy for enhanced ratepayer impact transparency, the Commission acknowledged the importance of ratepayer impact analysis to enhance transparency and demonstrate potential impacts to ratepayers of both acquiring and acquired systems. Final Decision at pp. 54-56. Consistent with CforAT's support for public notice requirements to increase transparency and enable ratepayer participation in the acquisition process, the Commission adopted the Staff Proposal's notice requirements, with additional requirements for the public notice to identify planned public engagement or community meetings. The Commission agreed with CforAT that transparency in the acquisition process is fundamental and directed that proposed acquisitions should include	

with information about ratepayer impacts. Comments on Water Division Staff Proposal at p. 5, referenced in Final Decision at p. 15.	either community meetings or public participation hearings, depending on the type of acquisition. Final Decision at pp. 58-59.	
Coordination with SWRCB CforAT supported the development of shared documents and data to be used by the Commission and SWRCB. Comments on Water Division Staff Proposal at p. 6, referenced in Final Decision at p. 15.	Consistent with CforAT's recommendations, the Commission concluded that it is reasonable to improve coordination with SWRCB and to revisit the existing MOU between the Commission and SWRCB and establish a Joint Task Force for regular coordination. Final Decision at p. 89 COL 3, p. 95 COL 53.	
Acquisitions Involving Non-IOUs CforAT supported the Staff Proposal's recommendation that the revised framework require utilities to seek Commission authorization for the acquisition of mutual or municipal water systems by IOUs. Comments on Water Division Staff Proposal at p. 6, referenced in Final Decision at pp. 15, 83.	Consistent with CforAT's recommendations, the Commission adopted the Staff Proposal's revised framework for acquisitions involving non-IOUs for greater transparency and protection of ratepayers. Final Decision at p. 84.	

B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties: At times, CforAT's positions overlapped with those taken by UCS/RCAC, Cal Advocates, MPWMD, CWA.		
d. Intervenor's claim of non-duplication:		

As recognized in the Final Decision, CforAT provided ongoing and unique focus on the impact of proposed changes to the water acquisition framework to vulnerable customers and communities. Final Decision at pp. 14-15. While CforAT was an active participant throughout the proceeding, we did not address issues that were not directly related to our priorities, and we relied on other parties to address issues where we do not have expertise. For example, as noted in the Final Decision, CforAT expressed no opinion on issues such as rate deferment or reporting schedules. Final Decision at p. 14. In addition, CforAT coordinated with other parties as appropriate, including submitting joint filings. To the extent that parties shared positions, this consensus among advocates arose from the importance of the issues under consideration, meaningfully influenced the Commission's comprehensive modifications to the water utility acquisitions framework, and should not be a basis for a reduction in compensation.	

C. Additional Comments on Part II: ***<u>(use line reference # or letter as appropriate)</u>***

#	Intervenor's Comment	CPUC Discussion

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

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

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: CforAT's overall cost of participation is reasonable. Our efforts in this proceeding have focused on supporting the improvement of the Commission's framework for reviewing water acquisitions for regulated water utilities, including addressing failing, at-risk, and potentially at-risk water systems. In particular, CforAT has focused on protecting ratepayers, especially in vulnerable communities, and ensuring fair, just, and reasonable rates. CforAT represents utility customers with disabilities and medical needs, who have a strong interest in ensuring access to clean water to protect their health and safety, and who are also disproportionately low income, which gives them heightened interest in the affordability impacts of water acquisitions. While it is difficult to assign a monetary value to CforAT's contributions, CforAT's efforts to support an improved, transparent, accountable, and ratepayer-centered framework for water acquisitions provided a substantial benefit to this population.	
b. Reasonableness of hours claimed:	

	CPUC Discussion
CforAT's work in this proceeding was led by CforAT's Legal Counsel, Paul Goodman, who has substantial expertise in utility acquisitions and consumer advocacy. Mr. Goodman holds an LLM in intellectual property law and during these studies worked as an as a research assistant for Professor Catherine J.K. Sandoval, focusing on antitrust and intellectual property issues. He has substantial experience in reviewing mergers and transactions before the Commission and in representing CforAT's constituency of utility customers with disabilities and medical needs. As appropriate, Mr. Goodman delegated specific tasks, including drafting certain filings such as workshop comments, to CforAT's then-Legal Fellow Alexandra Green. As Mr. Goodman appropriately supervised and reviewed Ms. Green's work, this type of delegation is appropriate and efficient, particularly in light of the substantial differences in the hourly rates for Mr. Goodman and Ms. Green. Additionally, both Mr. Goodman and Ms. Green's work was supervised by Melissa W. Kasnitz, CforAT's Legal Director, who has greater experience representing the interests of CforAT's constituency of utility customers with disabilities and medical needs before the Commission. Ms. Kasnitz's supervision of Mr. Goodman and Ms. Green's work was appropriate and efficient.	
c. Allocation of hours by issue: **Hours of Paul Goodman, 2022: 39.6 hours** **Procedural: 6.8 hours, 17.2 percent** The issue area "Procedural" includes time spent on procedural matters such as preparing for and attending the pre-hearing conference, and includes activities that do not neatly fit into another category. **OIR: 24.6 hours, 24.6 percent** The issue area "OIR" includes time spent on reviewing and commenting on the Order Instituting Rulemaking (including the white paper attached to the OIR) in this proceeding. **Staff Proposal: 1.8 hours, 4.5 percent** The issue area "Staff Proposal" includes time spent reviewing and commenting on staff proposals and reports. **Workshop: 6.4 hours, 16.2 percent** The issue area "Workshop" includes time spent on preparing for, participating in, and commenting on workshops and workshop reports. **Hours of Paul Goodman, 2023: 79.9 hours** **Coordination: 4.6 hours, 5.8 percent** The issue area "Coordination" includes time spent conferring and collaborating with other parties, coordinating filings, and otherwise avoiding duplication of effort.	

	CPUC Discussion
Staff Proposal: 4 hours, 4.5 percent **Workshop: 71.3 hours, 89.2 percent** **Hours of Paul Goodman, 2024: 7 hours** **Workshop: 7 hours, 100 percent** **Hours of Paul Goodman, 2025: 11.6 hours** **Coordination: 0.2 hours, 1.7 percent** **Staff Proposal: 10.2 hours, 87.9 percent** **Law and Motion: 1.2 hours, 10.3 percent** The issue area "Law and Motion" includes time spent responding to motions from other parties. **Hours of Paul Goodman, 2026: 5.8 hours** **PD: 5.8 hours, 100 percent** **Hours of Melissa Kasnitz, 2022: 5.0 hours** **Procedural: 0.1 hours, 2.0 percent** **OIR: 4.9 hours, 98 percent** **Hours of Melissa Kasnitz, 2023: 5.0 hours** **Workshop: 5 hours, 100 percent** **Hours of Melissa Kasnitz, 2024: 7.5 hours** **Procedural: 0.2 hours, 2.7 percent** **Workshop: 7.3 hours, 97.3 percent** **Hours of Melissa Kasnitz, 2026: 2.0 hours** **PD: 2 hours, 100 percent** **Hours of Alexandra Green, 2023: 15.6 hours** **Coordination: 1.2 hours, 7.7 percent** **OIR: 0.3 hours, 1.9 percent** **Staff Proposal: 1.6 hours, 10.3 percent**	

	CPUC Discussion
Workshop: 12.5 hours, 80.1 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	2022	5.0	$ 690	D.23-03-030	$ 3,450.00			
Melissa W. Kasnitz	2023	5.0	$ 715	D.24-06-018 (CASF)	$ 3,575.00			
Melissa W. Kasnitz	2024	7.5	$ 735	D.24-10-028	$ 5,512.50			
Melissa W. Kasnitz	2026	2.0	$ 780	D. 26-07-022	$ 1,560.00			
Paul Goodman	2022	39.6	$ 550	D.23-03-030	$ 21,780.00			
Paul Goodman	2023	79.9	$ 575	D.24-03-025	$ 45,942.50			
Paul Goodman	2024	7.0	$ 625	D. 25-04-018	$ 4,375.00			
Paul Goodman	2025	11.6	$ 680	D. 26-07-022	$ 7,888.00			
Paul Goodman	2026	5.8	$ 705	D. 26-07-022	$ 4,089.00			
Alexandra Green	2023	15.6	$ 220	D.24-09-018	$ 3,432.00			
Subtotal: $ 101,604.00						***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]								

CLAIMED						CPUC AWARD		
[Person 2]								
					Subtotal: $			***Subtotal: $***
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Paul Goodman	2022	0.9	$ 275	½ regular rate	$ 247.50			
Paul Goodman	2026	3	$ 352.50	½ regular rate	$ 1,057.50			
Rachel Sweetnam	2026	9.5	$ 150.00	½ regular rate	$ 1,425.00			
					Subtotal: $ 2,730.00			***Subtotal: $***

COSTS				
#	**Item**	**Detail**	**Amount**	**Amount**
1.				
2.				
			Subtotal:	***Subtotal: $***
			TOTAL REQUEST: $ 104,334.00	***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. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

**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	62679	No
Paul Goodman	2002	219086	No
Alexandra Green	2022	346771	No
Rachel Sweetnam	2023	350075	No

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

C. Attachments Documenting Specific Claim and Comments on Part III[3]:
(Intervenor completes)

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Time Records
3	**Sweetnam Rate – 2026:** CforAT has previously requested a 2026 rate for Staff Attorney Rachel Sweetnam based on her experience as an Attorney Level II, including both the 2026 COLA increase and requested step increase from her authorized 2025 rate. See CforAT Compensation Request filed in A.24-10-006 on March 20, 2026, at p. 35. In D.26-08-028, issued in R.20-08-021, the Commission set a 2026 rate for Ms. Sweetnam of $285, based on application only of the COLA and no step increase. In that compensation request, CforAT requested compensation at Ms. Sweetnam's 2025 rate and had not addressed her 2026 rate because all work on the merits of that document had been finalized in 2025, and only compensation work took place in 2026. CforAT appreciates that the Commission still applied a 2026 rate, but now we request application of the appropriate step increase.

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?	

If so:

Party	Reason for Opposition	CPUC Discussion

B. Comment Period: Was the 30-day comment period waived (*see* Rule 14.6(c)(6))?	

[3] Attachments not attached to final Decision

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.26-07-007.

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.26-07-007		
Proceeding(s):	R.22-04-003		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
CENTER FOR ACCESSIBLE TECHNOLOGY	September 8, 2026	***$ 104,334.00***		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	$ 690	2022	
Melissa	Kasnitz	Attorney	$ 715	2023	
Melissa	Kasnitz	Attorney	$ 735	2024	
Melissa	Kasnitz	Attorney	$ 780	2026	
Paul	Goodman	Attorney	$ 550	2022	
Paul	Goodman	Attorney	$ 575	2023	
Paul	Goodman	Attorney	$ 625	2024	
Paul	Goodman	Attorney	$ 680	2025	
Paul	Goodman	Attorney	$ 705	2026	

Alexandra	Green	Attorney	$ 220	2023	
Rachel	Sweetnam	Attorney	$ 300	2026	

(END OF APPENDIX)