



FORM A: BLANK NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION

FILED

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

04:59 PM

Application of the California Market Transformation Administrator (U-1399-E) for Approval of the Second Tranche of Statewide Energy Efficiency Market Transformation Initiatives.	A.26-07-004 (Filed July 7, 2026) A2607004
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**NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION
AND, IF REQUESTED (and ☒ ¹ checked), ADMINISTRATIVE LAW JUDGE'S
RULING ON [CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE]'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 Icompcoordinator@cpuc.ca.gov.

Customer or Eligible Local Government Entity (party intending to claim intervenor compensation): California Environmental Justice Alliance ("CEJA")	
Assigned Commissioner: Commissioner Karen Douglas	Administrative Law Judge: ALJ Julie A. Fitch and ALJ Valerie Kao
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/ Rebecca Barker
Date: October 1, 2026	Printed Name: Rebecca Barker

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)
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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).

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

1. A <u>Category 1</u> 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 <u>Category 2</u> 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 <u>Category 3</u> 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 reference (the proceeding's docket number and the date of filing) to such filings needs to be made.	

CEJA’s Category 3 Status

The California Environmental Justice Alliance (“CEJA”) is an alliance of grassroots environmental justice organizations situated throughout California. CEJA’s mission is to build the power of communities across California to create policies that will alleviate poverty and pollution through a statewide movement and advocacy for environmental health and social justice. CEJA’s member organizations work with low-income communities and communities of color throughout California, who are all residential ratepayers living in disadvantaged communities (“DACs”). These communities bear disproportionate energy burdens and utility debt, and are disproportionately harmed by the impacts of gas infrastructure, such as air pollution, explosions, and flaring. CEJA member organizations represent communities throughout the state, including in the Investor-Owned Utilities’ (“IOUs”) service territories.

For years, CEJA operated as a project of the Environmental Health Coalition (“EHC”), which was its the fiscal sponsor, and which was repeatedly adjudicated to be a Category 3 customer under Section 1802(b)(1)(C) of the Public Utilities Code.³

As of June 30, 2023, CEJA ceased to be a project of, or fiscally sponsored by EHC. Instead, CEJA now operates as an independent 501(c)(3) California nonprofit public benefit corporation. This change of corporate identity does not change CEJA’s mission, vision, goals, strategies, or work. Pursuant to its bylaws, which were filed in A.22-05-015/-016 on May 26, 2023, CEJA qualifies as a Category 3 customer.⁴ The Commission found that CEJA satisfied all requirements to be classified as a Category 3 customer in a June 29, 2026 ruling on that proceeding.⁵

In D.98-04-059 at 29, n. 14 (Intervenor Compensation Order), the Commission reaffirmed its “previously articulated interpretation that compensation be proffered only to customers whose participation arises directly from their interests as customers.”⁶ In that Order, the Commission further explained that:

³ See Agreement between EHC and CEJA, filed on July 3, 2018 in A.17-04-028, et. al. (describing CEJA as a “project” of EHC and establishing the terms for the relationship between EHC and CEJA).

⁴ A.22-05-015/016, Amended Notice of Intent to Claim Intervenor Compensation and, if Requested (and [X] checked), Administrative Law Judge’s Ruling on California Environmental Justice Alliance’s Showing of Significant Financial Hardship, Attach. 2: Amended and Restated Bylaws of California Environmental Justice Alliance (May 26, 2023) (“Bylaws”), <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M510/K287/510287184.PDF>.

⁵ A.22-05-015/016, Administrative Law Judges’ Ruling on California Environmental Justice Alliance’s Amended Notice of Intent to Claim Intervenor Compensation, <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M609/K658/609658295.PDF>.

⁶ D.98-04-059, *Interim Opinion Revising the Intervenor Compensation Program and Inviting Legislative Amendment Proposals*, at 29 n.14 (Apr. 23, 1998) (“D.98-04-059”).

[w]ith respect to environmental groups, we have concluded they were eligible in the past with the understanding that they represent customers whose environmental interests include the concern that, e.g., regulatory policies encourage the adoption of all cost-effective conservation measures and discourage unnecessary new generating resources that are expensive and environmentally damaging. (D.88-04-066, mimeo at 3.) They represent customers who have a concern for the environment which distinguishes their interests from the interests represented by Commission staff, for example.⁷ CEJA’s bylaws meet this requirement by providing that: The purpose of this corporation is to achieve environmental and social justice by empowering impacted communities to make social change. This corporation organizes, educates, develops leadership and participates in regulatory and public proceedings to protect public health and the environment threatened by toxic pollution. This corporation supports broad efforts that create a just society and fosters a healthy and sustainable quality of life.⁸ As this language provides, CEJA works to empower impacted communities through its participation in “regulatory and public proceedings” to protect both public health and the environment threatened by pollution. In other words, just as it did when it was fiscally sponsored by EHC, CEJA continues to represent impacted communities that share a concern for public health and the environment. CEJA represents organizations whose members live in environmental justice communities and are customers that share a concern for public health and the environment. The concerns of these members distinguish their interests from Commission staff and other California ratepayers participating in this matter. This establishes that CEJA qualifies as a Category 3 customer. CEJA has previously been found eligible for intervenor compensation in multiple California Public Utilities Commission proceedings. Most recently, in its current independent form, CEJA was found eligible as a Category 3 customer in a September 17, 2026 Decision in A.22-05-015/016.⁹ Additional times CEJA has been found eligible for intervenor compensation include, but are not limited to:	
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⁷ See also D.09-09-045, *Decision Granting Intervenor Compensation to Sustainable Conservation for Substantial Contributions to Decision 07-07-27*, at 8 (Oct. 1, 2009).

⁸ A.22-05-015/016, Amended Notice of Intent to Claim Intervenor Compensation of California Environmental Justice Alliance, Attach. 2, Bylaws of California Environmental Justice Alliance (May 26, 2023), <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M510/K287/510287184.PDF>.

⁹ D.26-09-071, *Decision Granting Compensation to California Environmental Justice Alliance for Substantial Contribution to Decision 24-12-074* (Sep. 24, 2026), <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M620/K866/620866688.PDF>.

• A.22-05-015/016, Administrative Law Judge’s Ruling on California Environmental Justice Alliance’s Amended Notice of Intent to Claim Intervenor Compensation (June 29, 2026); • D.25-04-015, Decision Granting Compensation to California Environmental Justice Alliance for Substantial Contribution to D.24-05-028 (Apr. 7, 2025) (R.22-07-005) • D.24-03-022 (Mar. 14, 2024) (R.22-07-005); • D.24-01-050 (Feb. 1, 2024) (R.20-05-003); • R.23-10-011, Administrative Law Judge’s Ruling on California Environmental Justice Alliance’s Notice of Intent to Claim Intervenor Compensation (Apr. 5, 2024); • D.23-10-020 (Oct. 16, 2023) (R.21-02-014); • D.23-10-014 (Oct. 13, 2023) (R.19-01-011); and • D.23-08-016 (Aug. 15, 2023) (R.20-11-003). CEJA was also found eligible in its prior corporate form with fiscal sponsorship, but pursuant to identical EHC bylaws in: • R.19-11-009, Administrative Law Judge’s Ruling on California Environmental Justice Alliance’s Showing of Significant Financial Hardship (Mar. 13, 2020); • D.19-11-012 (Nov. 12, 2019) (A.17-04-028 et al.) • A.17-04-028, et. al., Administrative Law Judge’s Ruling on California Environmental Justice Alliance’s Amended Notice of Intent to Claim Intervenor Compensation (Oct. 11, 2018) CEJA has also been previously found eligible as a Category 3 customer in several older proceedings and decisions, including D.16-10-016, D.17-01-031, D.18-03-028, and D.18-10-051. Pursuant to Rule 17.1(d), a true and correct copy of CEJA’s bylaws were filed in A.22-05-015/A.22-05-016 on May 26, 2023. <u>Overview of CEJA and Its Members:</u> CEJA, consistent with its bylaws, has built an alliance of organizational members to organize and participate in regulatory and public proceedings on behalf of impacted communities and develop leadership to protect public health and the environment threatened by pollution. CEJA has two types of organizational memberships—core and partner memberships—to represent and advocate for impacted communities	
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throughout the state.¹⁰ Core members are base-building environmental justice organizations who are deeply engaged in CEJA’s work. Each core member has their Executive Director on CEJA’s steering committee and staff members sitting on program committees.

The core members of CEJA are: Asian Pacific Environmental Network (“APEN”), the Center for Community Action and Environmental Justice (“CCA EJ”), Center on Race, Poverty & the Environment (“CRPE”), Communities for a Better Environment (“CBE”), Environmental Health Coalition (“EHC”), People Organizing to Demand Environmental and Economic Rights (“PODER”) and Physicians for Social Responsibility – Los Angeles (“PSR-LA”).¹¹ The bylaws of each of the core members were filed in A.11-05-023.

CEJA also has partner members that are doing environmental justice work but are not limited to environmental justice-identified organizations. Each partner organization sits on at least one of CEJA’s program committees. CEJA’s partner organizations are the Central Coast Alliance United for a Sustainable Economy (“CAUSE”), Leadership Counsel for Justice and Accountability (“LCJA”), Strategic Concepts in Organizing and Policy Education (“SCOPE”).¹²

CEJA has brought together these organizations to impact and change policy decisions throughout the state. Together, the member organizations of CEJA work to achieve environmental justice for low-income communities and communities of color throughout California. In particular, CEJA is pushing for policies at the federal, state, regional and local levels that protect public health and the environment. CEJA is also working to ensure that California enacts statewide climate change policies that protect low-income communities and communities of color.

One of CEJA’s primary initiatives is to transform California’s energy system into one that is just, democratic, equitable, and composed of genuinely clean energy. To accomplish this transformation, CEJA works to advance ESJ Communities’ access to efficient, zero-emission technologies and healthy, decarbonized buildings, in addition to decarbonizing the energy system generally. CEJA has been a party to numerous Commission proceedings to that end. For example, CEJA was an active participant in the Long Term Procurement Plan Proceeding and the 2024 General Rate Case (“GRC”) for the Sempra Utilities (A.22-05-015/016), and CEJA is currently active in a number of proceedings, including the Building Decarbonization Rulemaking (R.19-01-011), the Palomar Decarbonization Demonstration Project Proceeding (A.25-12-009) and the Sempra Utilities’ TY 2028 GRC (A.26-06-014/015). CEJA was also a party to the Demand Flexibility Proceeding (R.22-07-

¹⁰ California Environmental Justice Alliance, *Members and Partners*, <https://caleja.org/about-us/members/> (last accessed Sep. 14, 2026).

¹¹ *Id.*

¹² *Id.*

005), advocating for progressive income graduated fixed charges and demand flexibility studies which support energy affordability in DACs. CEJA further participated in the Wildfire Mitigation Plans Proceeding (R.18-10-007) advocating for community outreach and oversight of utility plans and the Long-Term Gas System Planning Proceeding (R.20-01-007) advocating for thoughtful gas system phase down and retirement, prioritizing the impacts to environmental justice communities.

Below are the descriptions of CEJA's members, which it advocates on behalf of through its Steering Committee and program committees.

CEJA CORE MEMBERS

As described above, the executive director of each CEJA core member sits on CEJA's Steering Committee, and core member staff participate in at least one committee.

Asian Pacific Environmental Network (APEN) - APEN is a non-profit environmental justice organization that focuses on Asian and Pacific Islander environmental and social justice issues through community organizing, policy initiatives, and civic engagement.¹³ APEN is based in California and seeks environmental justice for all people but focuses its work with Asian and Pacific Islander communities that are also located in California. The majority of APEN's approximately 800 members live in California. APEN represents ratepayers with environmental concerns in Asian and Pacific Islander communities in California. APEN's policy planks include equitable implementation of AB32, geographic targeting of environmental justice priority areas, increased penetration of Distributed Generation in environmental justice communities, promotion of Climate / Green Jobs and economic development, community choice energy, renewable energy and energy efficiency financing, and limiting dirty crude oil imports.¹⁴ For example, during the past several years, APEN has worked on the Oakland Energy and Climate Action Plan and the Richmond General Plan.

Communities for a Better Environment (CBE) - CBE's mission is to achieve environmental health and justice by building grassroots power in and with communities of color and working-class communities.¹⁵ CBE has participated independently from CEJA in proceedings before the Commission on previous occasions including: A.09-04-001, A.09-09-021, R.10-05-006 and A.13-11-006. CBE was determined eligible to receive, and did in fact receive, intervenor compensation in R.10-05-006.

¹³ See Asian Pacific Environmental Network, <https://apen4ej.org/> (last accessed Sep. 24, 2026). APEN's bylaws were filed in A.11-05-023.

¹⁴ Asian Pacific Environmental Network, *What We Do*, <https://apen4ej.org/our-work/> (last accessed Sep. 24, 2026).

¹⁵ Communities for a Better Environment, <http://www.cbecal.org/> (last accessed Sep. 24, 2026).

CBE’s bylaws provide that the mission of the organization is to conduct “education, research, litigation, fundraising and advocacy . . . promoting the protection of the environment and public health”¹⁶ The organization and its members have engaged in research, advocacy and litigation specifically directed at securing “cost effective conservation measures and discourag[ing] unnecessary new generating resources that are expensive and environmentally damaging.”¹⁷ CBE has thousands of members throughout the state of California. CBE’s members live, work, or engage with environmental justice issues in urban communities in Northern and Southern California. CBE represents ratepayers with environmental concerns in low-income communities of color throughout California. <i>The Center for Community Action and Environmental Justice (CCA EJ)</i> - CCA EJ is a non-profit organization that provides leadership training and skills development programs to educate and empower the community.¹⁸ CCA EJ’s mission is to organize local leadership and to build a base of community power to improve the social and natural environment. CCA EJ has worked on creating solutions for high pollution levels and land use problems in Latino communities in California. CCA EJ’s bylaws provide that it will “work within communities to develop and sustain democratically based, participatory decision-making that promote involvement of a diverse segment of the community in ways that empower and create safe, healthy, toxic free places to live, work, learn and play.” CCA EJ represents ratepayers with environmental concerns in communities in California. The majority of CCA EJ’s thousands of members reside in California. <i>Center on Race, Poverty & the Environment (CRPE)</i> - CRPE is a non-profit “public benefit” California corporation, authorized pursuant to its articles of incorporation to “perform advocacy on behalf of low-income communities and communities of color” and to assist those communities to build capacity to protect themselves from environmental hazards.¹⁹ CRPE’s mission is achieve environmental justice and healthy sustainable communities through collective action and the law.²⁰ CRPE aims to build the power of residents in California’s San Joaquin Valley, improve community health, and address environmental hazards in low-income and immigrant communities. CRPE is based in California and has approximately 500 members, the majority of whom reside in California. CRPE represents ratepayers with environmental concerns in low-income communities of color in California. <i>Environmental Health Coalition (EHC)</i> - Consistent with its bylaws, EHC has long advocated on behalf of impacted communities to protect public health and the	
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¹⁶ CBE’s bylaws were filed in R.10-05-006.

¹⁷ See D.88-04-066, mimeo at 3.

¹⁸ Center for Community Action and Environmental Justice, <http://ccaej.org/> (last accessed Sep. 24, 2026). CCA EJ’s bylaws were filed in A.11-05-023.

¹⁹ CRPE’s bylaws were filed in A.11-05-023.

²⁰ Center for Race, Poverty and the Environment, <https://crpe-ej.org> (last accessed Sep. 24, 2026).

environment threatened by toxic pollution. As a prior ruling already acknowledged, EHC brings a “wealth of experience” to a Commission proceeding.²¹

EHC has worked to reduce energy use, maximize local, small scale clean energy generation and create high-quality, career-track jobs in the area’s disadvantaged and heavily impacted communities. EHC is also committed to creating a home retrofit industry to meet greenhouse gas reduction goals and create employment. EHC is committed to pursuing pilot programs that push the policy envelope and increase awareness of energy use in buildings. EHC has also done in home peer-to-peer education programs for the U.S. Department of Housing and Urban Development’s Healthy Homes Program, SDG&E’s Smart Meter Program, and the City of San Diego’s Home Energy Retrofit program.

People Organizing to Demand Environmental and Economic Rights (PODER) -

PODER is an organization that works to organize residents in San Francisco’s Mission neighborhood in order to find local solutions for low-income communities and communities of color.²² In particular, PODER has organized around reducing environmental hazards impacting immigrant communities.²³ PODER is funded by Tides Foundation, a non-profit organization that provides fiscal sponsorship to over 230 groups across the United States.²⁴ The Tides Foundation’s Articles of Incorporation provide that “[t]he specific purpose of this corporation includes, but is not limited to, the nurture and development of competently managed charitable and educational non-profit activities.”²⁵

Physicians for Social Responsibility – Los Angeles (PSR-LA) represents over 5,000 physician and health advocates in Southern California and works to protect public health from nuclear threats and environmental toxins by informing the medical community and policymakers about safer practices that strengthen engagement in meaningful public health and environmental advocacy.²⁶

PARTNER MEMBERS

As described above, these members participate in at least one committee, but they do not sit on the steering committee.

Central Coast Alliance United for a Sustainable Economy (CAUSE) builds grassroots power to invoke social, economic, and environmental justice for the people of California’s Central Coast region through policy research, leadership

²¹ R.09-11-014, Dec. 22, 2011 ALJ Ruling Granting Party Status to EHC.

²² PODER, <https://podersf.org> (last accessed Sep. 24, 2026).

²³ PODER, *Mission and Vision*, <https://podersf.org/mission/> (last accessed Sep. 24, 2026).

²⁴ The Tides Center, <http://www.tides.org/about> (last accessed Sep. 24, 2026).

²⁵ Tides Revised Articles of Incorporation 2006 at p.1, attached to Feb. 29, 2012 CEJA NOI in A.11-05-023.

²⁶ Physicians for Social Responsibility, Los Angeles, <https://www.psr-la.org/> (last accessed Sep. 24, 2026).

development, organizing, and advocacy.²⁷ CAUSE defines the Central Coast region as the counties of Ventura, Santa Barbara, San Luis Obispo, Santa Cruz, Monterey, and San Benito. <u>Leadership Counsel for Justice and Accountability (LCJA)</u> is based in the San Joaquin and East Coachella Valley and mobilizes community voices, advocates for sound policies, and eradicates injustice to promote equal access to opportunity regardless of race, income, and place.²⁸ Leadership Counsel has advocated for the communities that it represents before the Commission. <u>Strategic Concepts in Organizing and Policy Education (SCOPE)</u> builds grassroots power to create social and economic justice for low-income, female, immigrant, black, and brown communities in Los Angeles.²⁹ To do this, SCOPE organizes communities, develops leaders, collaborates through strategic alliances, builds capacity through training programs, and educates South LA’s residents to have an active role in shaping policies that affect the quality of life in our region. SCOPE-LA has been advocating for energy and water debt forgiveness at the Los Angeles Department of Water and Power.	
Do you have any direct economic interest in outcomes of the proceeding?³⁰ 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)	
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

²⁷ CAUSE, <https://causenow.org/> (last accessed Sep. 24, 2026).

²⁸ Leadership Counsel for Justice and Accountability, <https://leadershipcounsel.org> (last accessed Sep. 24, 2026).

²⁹ SCOPE-LA, <http://scopela.org/> (last accessed Sep. 24, 2026).

³⁰ See Rule 17.1(f).

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: 9/11/2026	☒ 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: - Investigate each of the proposed Market Transformation Initiatives to determine whether they are best designed to benefit ESJ Communities and meet regulatory requirements. The party's explanation of how it plans to avoid duplication of effort with other parties: CEJA will coordinate with other parties with whom it has common interests to avoid unnecessary duplication and focus its efforts on issues not being covered by other parties or providing unique evidence and argument into the record of the proceeding 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). CEJA plans to participate in all elements of this proceeding, including filing testimony, post-hearing briefs and comments, and conducting discovery as necessary to develop the record.				
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				
Rebecca Barker (Attorney)	100	\$425	\$42,500	1
Anirudh Krishna (Attorney)	100	\$275	\$27,500	2
Kjellen Belcher (Expert)	100	\$300	\$30,000	3
Theodore Caretto (Attorney)	20	\$335	\$6,700	4
<i>Subtotal: \$106,700</i>				
OTHER FEES				
Celine Busnelli (Paralegal)	100	\$130	\$13,000	5
<i>Subtotal: \$13,000</i>				
COSTS				
<i>Subtotal: \$</i>				
<i>TOTAL ESTIMATE: \$119,700</i>				
Estimated Budget by Issues: - Heat Pump Water Heater MTI – 35% - Commercial Replacement and Attachment Window Solutions MTI – 35% - Commercial Rooftop Units MTI – 20% - General – 10%				
Support for Request for Market Rate for CEJA Attorneys and Experts CEJA can appear at the Commission because attorneys and experts represent it on a contingency basis, reimbursed only when determined to have made a substantial contribution, sometimes years after the fact through intervenor compensation awards. Other than moneys recovered through intervenor compensation awards, CEJA does not pay CEJA member organizations for attorneys and experts who are employed by member organizations to represent CEJA. Theodore Caretto is a staff member at Communities for a Better Environment (“CBE”). The agreement between CBE and CEJA for representing CEJA at the Commission is attached hereto. CBE only receives intervenor compensation from CEJA for time spent representing CEJA. Earthjustice staff, such as Rebecca Barker, Anirudh Krishna, Kjellen Belcher, and Celine Busnelli also participate in CEJA’s representation on a contingency basis, reimbursed only when determined to have made a substantial contribution and awarded intervenor compensation. Earthjustice will file its confidential retainer agreement under seal with any future claim for intervenor compensation for its staff’s hours in this proceeding, if required by the Commission.				
Comment #1 Rebecca Barker is a Senior Attorney in the Clean Energy Program at Earthjustice. She graduated from the University of Chicago Law School in 2019 and was admitted to the California Bar in 2020 (California Bar Number 331672). Ms. Barker has more than six years of experience representing clients in PUC proceedings in California and other states. Ms. Barker’s most recently approved rate is \$265 for work performed in 2025, which was granted in D.26-03-037.³¹				

³¹ *Id.*

CEJA anticipates seeking a recalculation of Ms. Barker's rate beginning in 2026 at \$425/hour to reflect her advancement to the low-medium range of the Attorney III category in the Commission's rate lookup tool.

Comment #2

Anirudh Krishna is a 2025 graduate of the University of California, Los Angeles School of Law and holds a Ph.D. in Mechanical and Aerospace Engineering from the University of California, Irvine. At Earthjustice, Dr. Krishna has focused on practicing energy law before the California Public Utilities Commission. Dr. Krishna has previously worked as a Climate Mitigation Fellow at the Georgetown Climate Center in Washington, D.C., as a clerk at the California Public Utilities Commission, and as a clerk at the California Energy Commission.

CEJA intends to request a first-time rate for Dr. Krishna for work performed in 2026. The requested rate is below the median rate for attorneys with 1 year of experience in the Level 1 Hourly Rate lookup tool on the Commission's iComp website. CEJA will provide documentation supporting establishment of Dr. Krishna's hourly rate at the time of a future claim.

Comment #3

Kjellen Belcher is a Senior Research & Policy Analyst at Earthjustice. Ms. Belcher has a B.S. and M.S. in Earth Systems from Stanford University and 9 years of experience in environmental and climate policy. CEJA requested a rate of \$335 for Ms. Belcher's work in 2026 in its intervenor compensation claim in A.24-12-009, which is currently still pending. CEJA will provide documentation supporting Ms. Belcher's hourly rate at the time of a future claim.

Comment #4

Theodore Caretto is a Staff Attorney at Communities for a Better Environment ("CBE"), which is a CEJA member organization. Mr. Caretto graduated from the UCLA School of Law and was admitted to the California Bar in 2022 (SBN 347221). He has over four years of experience representing community-based and environmental justice organizations before the Public Utilities Commission and other state and local agencies. The Commission approved rates of \$305 and \$315 per hour for work performed in 2023 and 2024, respectively, for Mr. Caretto in D.25-04-015. For work performed in 2025, CEJA has requested a rate of \$325, which represents a 3.46% increase from the 2024 rate rounded to the nearest \$5 increment, as published in the CPUC's Hourly Rate Chart as the escalation rate for 2025. For work performed in 2026, CEJA requests a rate of \$335, which represents a 3.35% increase from the 2025 rate, as published in the CPUC's Hourly Rate Chart as the escalation rate for 2026.

Comment #5

Celine Busnelli is a Senior Litigation Assistant in Earthjustice's Clean Energy Program. Ms. Busnelli is a 2022 graduate of the University of California, Davis with B.A.s in History and International Relations. She has worked with Earthjustice in a specialized role on energy-related litigation teams, including administrative litigation at Public Utilities Commissions and the Federal Energy Regulatory Commission, in addition to litigation in state and federal courts, since 2022. CEJA requested a 2026 rate for Ms. Busnelli of \$130 in its intervenor compensation claim in

A.24-12-009, which is currently still pending. CEJA will provide documentation supporting establishment of Ms. Busnelli's hourly rate at the time of a future claim.

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: A.22-05-015/016	
Date of Administrative Law Judge's Ruling (or CPUC Decision) in which the finding of significant financial hardship was made: June 29, 2026	
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:	
CEJA has no economic interest in this proceeding. CEJA is focused on, and committed to, representing communities of color and low-income communities that are exposed to pollution, environmental contamination, and the effects of climate change in much higher capacity than their higher income neighbors. Further, the Commission has recently found, in a June 29, 2026 ruling, that CEJA has satisfied all requirements for a Category 3 customer in proceeding A.22-02-015/016.	

Under Section 1802(h), an organization can demonstrate significant financial hardship by showing that “the economic interest of individual members of the group or organization is small in comparison to the costs of effective participation.”³² Consistent with this statutory language, the Commission has found that groups that are authorized by their articles of incorporation or bylaws to represent the interests of residential customers—known as “Category 3 customers”—must meet the comparison test, while other groups must meet the “cannot afford” standard.³³ Accordingly, the Commission’s Intervenor Compensation Program Guide explains that the “comparison test” is the standard that applies to Category 3 customers and that they can meet this standard by, for example, stating that the \$25,000 cost of participating in a proceeding outweighs its members expected annual bill savings of about \$10.³⁴ In contrast, Category 1 and 2 customers must demonstrate that they cannot afford participation without undue hardship by submitting information about their income, expenses and assets.³⁵ Category 3 customers such as CEJA are not required to submit these financial disclosures.

If CEJA recovers intervenor compensation, that compensation will be used to compensate the advocates and attorneys for the time and resources spent to effectively participate in this proceeding. CEJA and its members will not individually economically benefit from its participation in this proceeding, thus the costs outweigh potential economic benefits to any individual member. To the extent that a member indirectly received economic benefits from adopting a technology advanced by one of the MTIs, such benefit would be far less than the estimated \$119,700 required for CEJA to participate fully in the proceeding.

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
2	Memorandum of Understanding Regarding Representation at the California Public Utilities Commission

³² Cal Pub Util Code § 1802(h).

³³ Decision 98-04-059, 79 CPUC 2d 628, 1998 WL 317562, COL #7. Previously, the Commission had interpreted the statute to give groups the option of employing either test. Decision (D.) 86-05-007, 1986 Cal. PUC LEXIS 287, *14, 21 CPUC 2d 99. The three categories of customer that are eligible for intervenor compensation are defined in Section 1802(b)(1). The complete statutory definition of a Category 3 customer is “[a] representative of a group or organization authorized pursuant to its articles of incorporation or bylaws to represent the interests of residential customers, or to represent small commercial customers who receive bundled electric service from an electrical corporation.” Section 1802(b)(1)(C).

³⁴ CPUC, *Intervenor Compensation Program Guide*, at 13–15 (Apr. 2017) <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/administrative-law-judge-division/documents/icmp-materials/updated-icmp-program-guide-april-2017.pdf>.

³⁵ *Id.* at 13–14.

ADMINISTRATIVE LAW JUDGE RULING³⁶
(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):	☐
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.	☐

³⁶ 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).

Dated _____, at San Francisco, California.

Administrative Law Judge