



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

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R1812005

Order Instituting Rulemaking to Examine Electric
Utility De-Energization of Power Lines in
Dangerous Conditions.

Rulemaking 18-12-005
(Filed December 13, 2018)

REPORT ON EX PARTE COMMUNICATION

Britt K. Marra
Executive Director
Small Business Utility Advocates
548 Market St., #11200
San Francisco, CA 94104
T: (971) 417-9730
E: britt@utilityadvocates.org

October 2, 2026



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OF THE STATE OF CALIFORNIA**

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REPORT ON EX PARTE COMMUNICATION

Pursuant to Rule 8.4 of the California Public Utilities Commission’s Rules of Practice and Procedure, Small Business Utility Advocates (“SBUA”) reports that on Tuesday, September 29, 2026, from approximately 10:00 to 10:20 a.m., Britt Marra, Executive Director of SBUA, met by video conference with Drew Hodel, Senior Advisor to President John Reynolds, Nick Dahlberg, Advisor to President Reynolds, and Seina Soufiani, Advisor to President Reynolds.

The meeting concerned intervenor compensation matters in Rulemaking (“R.”) 25-06-019 and R.18-12-005, including SBUA’s pending request for a significant financial hardship determination in R.25-06-019 and the Proposed Decision concerning SBUA’s intervenor compensation request in R.18-12-005. The meeting was requested by SBUA, and no written or other materials were provided or used during the meeting. The substance of the conversation addressed matters raised in SBUA’s August 31, 2026 Supplement to the Notice of Intent to Claim Intervenor Compensation in R.25-06-019 and its September 15, 2026 Comments on the Proposed Decision in R.18-12-005, and is summarized at a high level as follows:

With respect to the significant hardship showing, Ms. Marra discussed SBUA’s organizational structure and history of representing small commercial customers and explained its reliance on volunteers, outside counsel, consultants, and experts to mitigate the financial risks inherent in intervenor advocacy. She explained that this structure, as reflected on SBUA’s updated website, has enabled SBUA to participate effectively in a broad range of Commission

proceedings despite its limited internal resource. She also discussed the importance of SBUA's reputation in attracting skilled professionals who believe in its mission and are willing to accept the significant risks of compensation reductions and delays.

With respect to the De-Energization proceeding, Ms. Marra discussed: (1) the importance of consistent treatment among intervenors; (2) SBUA's concerns regarding Resolution WSEB-1 and the denial of compensation notwithstanding filing practices SBUA understood to be commonly accepted; (3) the importance of PSPS post-event reporting to small commercial customers; (4) SBUA's concern regarding the characterization of its work as vague when SBUA had identified specific issues and recommendations; and (5) SBUA's concern that the four-hour allowance did not reflect the professional time reasonably require to prepare an intervenor compensation claim, including the detailed analysis and documentation required to demonstrate substantial contribution and support the requested compensation

Dated: October 2, 2026

Respectfully Submitted,

/s/ Britt Marra
Britt K. Marra
Executive Director
Small Business Utility Advocates
548 Market St., #11200
San Francisco, CA 94104