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A2601003

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Pacific Gas and Electric Company's
(U 39 M) Application for Approval of its
2028-2033 Income-Qualified Programs.

Application 26-01-003

And Related Matters.

Application 26-01-005

Application 26-01-010

Application 26-01-011

**ADMINISTRATIVE LAW JUDGE'S RULING
ON NATIONAL DIVERSITY COALITION'S NOTICE OF INTENT
TO CLAIM INTERVENOR COMPENSATION**

Summary

This ruling directs National Diversity Coalition, Inc. (NDC) to provide supplemental information to support its Notice of Intent to Claim Intervenor Compensation (NOI) within 30 days of the issuance of this ruling. The NOI is attached to this ruling as Attachment 1.

1. Eligibility for Intervenor Compensation

Public Utilities Code Sections 1801-1812¹ govern the Commission's Intervenor Compensation Program. To qualify for compensation, an intervenor must satisfy the following requirements: (a) file a timely NOI (Code

¹ All references to the "Code" shall be to the California Public Utilities Code.

Section 1804(a)(1)), (b) demonstrate customer status (Code Section 1802(b)(1)), and (c) demonstrate significant financial hardship (Code Section 1802(h)).²

1.1. Timely Notice of Intent Filing

NDC filed a timely NOI in this proceeding pursuant to Code Section 1804(a)(1).

1.2. Customer Status

Pursuant to Code Section 1802(b)(1)(C), 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.”

NDC’s bylaws dated April 27, 2023, state that per Article II, NDC has been created:

1. To empower our nation’s minority communities by advocating for public policies that benefit low-to-moderate income families, providing them increased opportunities of influence with Federal, State and local regulatory agencies on a broad range of consumer, business and environmental issues.
2. To develop and promote operational services for small business lending, including creating and managing small business lending capital funds...
3. To develop and preserve affordable housing in the states served by NDC by participating in programs and projects that benefit low moderate income and first-time homebuyers, and empowering communities; including, but not limited to supporting housing and shelter initiatives via alliances and advocacy, management and technical assistance, research and public policy analysis,

² A showing of significant financial hardship can be deferred to the intervenor compensation claim filed pursuant to Code Section 1804(c).

fundraising and distribution, supporting neighborhood empowerment, engaging in housing development, rehabilitation, homebuyer assistance, housing support, home improvement, home ownership expense reduction, and other beneficial activities; and

4. To develop, promote and support education and community awareness programs including, but not limited to, consumer financial literacy, access to vital utilities and services, ... to assist underserved persons and communities to improve their economic participation and societal well-being, by operating internal NDC programs, including technical assistance to NDC members, and engaging in constructive collaboration with government... and industry.

The bylaws further authorize NDC:

to actively participate and intervene before the California Public Utilities Commission, and all other state or federal regulatory body that can or could affect directly or indirectly minority consumer and ratepayer interest, including the interest minority small business community.

Based on this information, we find that NDC has demonstrated customer status as a “Category 3” customer, pursuant to Code Section 1802(b)(1)(C).

1.3. Financial Hardship

Code Section 1802(h) explains that in the case of a group or organization, significant financial hardship means that “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.” Code Section 1804(b)(2) allows a finding of significant financial hardship made in one proceeding to extend to the intervenor’s eligibility in “other commission proceedings commencing within one year of the date of that finding.” The NOI at 8 refers to this “rebuttable

presumption of eligibility”³ and mentions the May 26, 2022 ruling (Application 21-10-010). However, this ruling does not apply to NDC’s eligibility here as the finding was made more than a year prior to the commencement of the present proceeding. To help confirm NDC’s continued eligibility, NDC shall provide the following information:⁴

- (a) A list of all contributions and grants received by NDC during the last three years (2023, 2024, and 2025), including the names of the contributors and/or grantors, grant amount, and the purpose, terms, and conditions of each contribution and grant.
- (b) A list of all contracts for services provided by NDC to third parties during the years 2023, 2024, and 2025, with names of the parties, contract amounts, and each contract’s terms and conditions.
- (c) A statement attesting and certifying whether NDC has any directors or officers who are affiliated with entities (including commercial, industrial, non-profit, or government organizations), that participate in industries or markets regulated by the Commission or that provide services to participants in those industries or markets. If any such affiliations exist, NDC shall identify each entity and describe the role and decision-making authority exercised by the affiliated director or officer within that entity.
- (d) NDC’s income and expense statements (unaudited and audited), for the years 2023, 2024, and 2025.

National Diversity Coalition shall submit the requested information above by filing a supplement to the NOI within 30 days of the issuance date of this ruling. Information NDC considers confidential may be submitted under seal

³ Code Section 1804(b)(2).

⁴ A ruling of January 28, 2026 (Rulemaking 23-11-001) made a similar request, but NDC did not respond.

accompanied by a motion to file under seal, pursuant to Rules 11.1 and 1.4 of the Commission's Rules of Practice and Procedure.⁵ Questions regarding compliance with this ruling may be directed to the Intervenor Compensation Program coordinator at Icompcoordinator@cpuc.ca.gov.

IT IS SO RULED.

Dated October 27, 2026, at San Francisco, California.

/s/ GARRETT TOY
Garrett Toy
Administrative Law Judge

⁵ Instructions on submitting confidential information can be found on the Commission's website at www.cpus.ca.gov, Proceedings and Rulemaking, and E-file a Document, Step-by-Step Instructions.

ATTACHMENT 1

NATIONAL DIVERSITY COALITION'S NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Pacific Gas and Electric Company's (U39M) Application for Approval of 2028-2033 Income Qualified Programs	Application 26-01-003 ^{A2601003} (Filed on January 9, 2026)
CONSOLIDATED	
Application of Southern California Edison Company (U338E) for Approval of its Energy Savings Assistance (ESA) and California Alternate Rates for Energy (CARE) Programs and Family Electric Rate Assistance (FERA) And Budgets for Program Years 2028-2033.	Application 26-01-005 (Filed on January 9, 2026)
Application of SAN DIEGO GAS & ELECTRIC COMPANY (U902M) for Approval of Low-Income Assistance Programs and Budgets for Program Years 2028-2033.	Application 26-01-010 (Filed on January 15, 2026)
Application of Southern California Gas Company (U904G) for Approval of its Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets for Program Years 2028-2033.	Application 26-01-011 (Filed on January 16, 2026)

NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION AND, IF REQUESTED (and ☒ checked), ADMINISTRATIVE LAW JUDGE'S RULING ON [National Diversity Coalition]'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

Customer or Eligible Local Government Entity (party intending to claim intervenor compensation): National Diversity Coalition

Assigned Commissioner: Matthew Baker

Administrative Law Judge: Garrett Toy

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).

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/ Fnu Adhil
Date: 4/08/2026	Printed Name:	Fnu Adhil

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

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

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

The party's explanation of its status as a Category 2 customer. 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.

The party's explanation of its status as a Category 3 customer. 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.

Cal Public Utilities Code §1802(b)(1)(C) requires that organizations claiming

Category 3 customer status is authorized in their bylaws to represent the interests of residential customers. In its bylaws, NDC is authorized to actively participate and intervene before the California Public Utilities Commission on all matters that can affect directly or indirectly the interests of minority consumers, ratepayers, and small businesses. NDC's bylaws (filed February 5, 2018 in A.17- 10-007 et. al) reflect its "customer" status, as found most recently in a ruling by mention Administrative Law Judges Chiv and Korpics in A.21-10-010 dated May 26, 2022.

NDC is a 501(c)(3) non-profit, made up of numerous separate and independent non-profits, community-based and faith-based organizations that each serve ratepayers in minority communities in different ways. NDC member organizations are united by their desire, expertise, and experience in bringing about greater social and financial equality and empowerment for underserved groups. NDC as a group and through its members has participated in numerous cases before the California Public Utilities Commission, including A.14-04-014, A.15-02-009, A.17-10-020 et al, A.18-06-015, and A.19-10-012, A.19.08.013, A.18.12.009, and among others. (NDC members have formerly organized under the name "Joint Minority Parties" and were represented by the National Asian American Coalition (NAAC) in prior CPUC proceedings). In the last year, NDC has participated in the A.24-03-009 proceedings to submit our comments on the ratepayer benefits program.

It is difficult to assign a percentage to the members of NDC who are or represent residential ratepayers and otherwise, for NDC does not have a traditional membership structure. NDC members provide direct services in their communities, primarily to residential ratepayers directly, but to some extent also supporting minority small business owners as well. NDC members and affiliate organizations include the Advancing the Seed, Inc., Asian Business Association, Clever Community Development, Filipino American Chamber of Commerce Cerritos, Filipino American Chamber of Greater Los Angeles, Island Pacific Supermarkets,

The Jesse Miranda Center for Hispanic Leadership, the Hmong Inc, Restore LA CDC, Network of Myanmar American Association, Santa Maria Group, Youth Business USA, California Journal For Filipino Americans, Diversity Biz Forum and New Beginnings.	
Do you have any direct economic interest in outcomes of the proceeding? ³ If “Yes”, explain:	☐ Yes ☒ No
B. Conflict of Interest (§ 1802.3)	Check
1. Is the customer a representative of a group representing the interests of small commercial customers who receive bundled electric service from an electrical corporation?	☐ Yes ☒ No
2. If the answer to the above question is “Yes”, does the customer have a conflict arising from prior representation before the Commission?	☐ Yes ☒ No
C. Status as an Eligible Local Government Entity (§§1802(d), 1802.4, 1803.1)	
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
<u>The party’s explanation of its status as an eligible local government entity</u> 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: 3/12/2026	☒ 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:	

³ See Rule 17.1(f).

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

The party's statement of the issues on which it plans to participate:

As the scoping memo and schedule have been released. The National Diversity Coalition's primary plans for participation are based on issues closely aligned with its mission to empower minority and low-income communities.

The NDC intends to address the following issues:

1. CARE Program: NDC expects to participate and submit comments on all sub-issues, including program budgets, enrollment goals, design and implementation, and associated performance standards.
2. FERA Program: NDC expects to participate and submit comments on all sub-issues, including FERA program budgets, enrollment goals, design and implementation, associated performance standards, and reporting requirements.
3. ESA Program: NDC expects to participate and submit comments on all sub-issues, including but not limited to ESA program budgets, enrollment goals, design and contracting implementation, associated performance standards, and the need for modifications related to targeted population and referral.
4. Other CARE/ESA/FERA programs: NDC expects to participate and submit comments on all sub-issues, including but not limited to upfront eligibility, enrollment processes, recertification, and post-enrollment verification, including modifications to existing post-enrollment verification limits
5. Concurrent Phase I: NDC expects to participate and submit comments on the implementation of the Concurrent Application System (CAS).
6. Data Sharing: NDC expects to participate and submit comments on data sharing with categorical and other utility-income-qualified programs, along with the policy framework the Commission should adopt to modernize the same.
7. Definitional Issues: NDC expects to participate and submit comments on the legal interpretation of "substantially the same" as used in Public Utilities Code Section 739.1(f)(1) and "income" as used in Public Utilities Code Section 739.1(a) and 739.12(a).

The NDC's arguments in these identified issues are intended to analyze the respective applications filed by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E); and review whether the intended applications to fund and implement changes in CARE, FERA and ESA are reasonable and beneficial to the low income and marginalized minority utility customers.

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

NDC represents constituencies that are not otherwise adequately represented in these proceedings or at this Commission, and has a grassroots perspective, distinct from other intervenors. NDC will also strive to coordinate with other ratepayer advocacy organizations with regard to submissions to the CPUC, utilizing joint comments when appropriate, and will meet and confer when possible.

The NDC has decades of grassroots experience working with ratepayers belonging to low-income and marginalized minority communities in California. The NDC's submission squarely provides a community perspective on the applications filed by the utility companies; and also analyzes whether these applications constitute a tangible benefit to low-income and marginalized minority groups, and whether the commission should adopt the same. The NDC's perspective and analysis will be unique compared to other parties, which may analyze strictly from a legal perspective. On the contrary, NDC submissions are a mixed perspective of legal, policy, and incorporate the direct voices of low-income communities into the proceedings of the commission.

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).

NDC plans to prepare filings, briefs, and testimony, conduct research, provide issue identification, case strategy, program design recommendations, and engage in negotiations and settlements as necessary, and participate in all hearings, conferences, workshops, etc. to the extent possible

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				
Fnu Adhil, Chief Legal Officer (Paralegal)	225	88.53	\$19,919.25	1
[Attorney 2]				
Faith Bautista, CEO	65	170	\$11,050.00	2
[Expert 2]				
[Advocate 1]				
[Advocate 2]				
Subtotal: \$30,969.25				
OTHER FEES				
[Person 1]				

[Person 2]																												
Subtotal: \$																												
COSTS																												
[Item 1]																												
[Item 2]																												
Subtotal: \$ 30,969.25																												
TOTAL ESTIMATE: \$																												
Estimated Budget by Issues:																												
At this point, NDC is unable to estimate with any certainty what it will cost to participate in this proceeding per issue. However, NDC will make every effort to diligently track and document all hours and expenses. The NDC estimated budget consists of the following:																												
<table border="1"> <thead> <tr> <th>Issue #</th> <th>Issue Name</th> <th>% of time</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>CARE Program</td> <td>30</td> </tr> <tr> <td>2.</td> <td>FERA Program</td> <td>20</td> </tr> <tr> <td>3.</td> <td>ESA Program</td> <td>15</td> </tr> <tr> <td>4.</td> <td>Other CARE/FERA/ESA</td> <td>10</td> </tr> <tr> <td>5.</td> <td>Concurrent Phase I</td> <td>10</td> </tr> <tr> <td>6.</td> <td>Date Sharing</td> <td>10</td> </tr> <tr> <td>7.</td> <td>Definitional Issue</td> <td>5</td> </tr> </tbody> </table>					Issue #	Issue Name	% of time	1.	CARE Program	30	2.	FERA Program	20	3.	ESA Program	15	4.	Other CARE/FERA/ESA	10	5.	Concurrent Phase I	10	6.	Date Sharing	10	7.	Definitional Issue	5
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<i>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.</i>																												

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.21-10-010 Date of Administrative Law Judge's Ruling (or CPUC Decision) in which the finding of significant financial hardship was made: May 26, 2022	☒
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:	
The Commission has previously ruled in numerous cases that NDC qualifies for significant hardship pursuant to §1802(g), most recently in A.21-10-010, in the ALJ Ruling on National Diversity Coalition's Showing of Significant Financial Hardship issued on May 26, 2022 by Administrative Law Judge Debbie Chev and Judge Brian Korpics. The "comparison test" to establish significant financial hardship found in §1802(h) requires that "the economic interest of the individual members of the group or organization is small in comparison to the cost of effective participation in the proceeding." The cost of NDC's participation in CPUC proceedings is estimated based on the number of hours likely necessary for effective participation, prior participation levels, and historical costs and fees. The estimated cost of participation substantially outweighs the small financial benefits that individual NDC members or community constituents might realize from the overarching reductions to program costs, changes to program design, and policy reforms that NDC advocates for. NDC's members represent low-income, minority ratepayers and small business owners. Accordingly, these economic interests are small relative to the costs of participation.	

**PART IV: ATTACHMENTS DOCUMENTING SPECIFIC ASSERTIONS MADE
IN THE NOTICE**

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

Attachment No.	Description
1	Certificate of Service

(END OF ATTACHMENT 1)