

Decision 24-04-030 April 18, 2024

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Consider New Approaches
to Disconnections and Reconnections to Improve Energy
Access and Contain Costs.

Rulemaking 18-07-005
(Filed July 12, 2018)

**DECISION GRANTING COMPENSATION TO THE UTILITY REFORM NETWORK
FOR SUBSTANTIAL CONTRIBUTION TO DECISION (D.) 23-08-049**

Intervenor: The Utility Reform Network (TURN)	For contribution to: Decision (D.)23-08-049
Claimed: \$30,828.75	Awarded: \$29,628.75
Assigned Commissioner: Darcie L. Houck ¹	Assigned ALJ: Stephanie Wang

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	In D.23-08-049, the Commission directed Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company to offer a 24-month payment plan to residential customers until October 1, 2026. Additionally, the decision extended the Arrearage Management Payment Plan program to October 1, 2026, and authorized a study of the eligible populations for the Medical Baseline program in the Large Utilities' service territories. Moreover, the Commission decided to continue their consideration of the Arrearage Management Payment Plan program issues in Phase 2.
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util.
Code §§ 1801-1812²:**

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		

¹ This proceeding was assigned to Commissioner Houck on February 23, 2021.

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

1. Date of Prehearing Conference:	8/15/2018	Verified
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	9/14/2018	Verified
4. Was the NOI timely filed?		Yes
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:	R.19-01-011	Verified
6. Date of ALJ ruling:	July 26, 2019	Verified
7. Based on another CPUC determination (specify):	N/A	
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	R.19-01-011	Verified
10. Date of ALJ ruling:	July 26, 2019	Verified
11. Based on another CPUC determination (specify):	N/A	
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.23-08-049	Verified
14. Date of Issuance of Final Order or Decision:	9/6/2023	Verified
15. File date of compensation request:	11/6/2023	Verified
16. Was the request for compensation timely?		Yes

PART II: SUBSTANTIAL CONTRIBUTION

A. Did the Intervenor substantially contribute to the final decision (*see* § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059):

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution	CPUC Discussion
<u>1. Inherent Problem of Automatic Enrollment</u>		Verified

<p>As noted by D.23-08-049, TURN strongly opposed automatic enrollment, arguing it limits ratepayers' agency and may reduce transparency for customers. Additionally, TURN recommended that the Commission continue to require the Large Utilities to offer 24-month payment plans to assist Californians with affordability challenges.</p> <p>CforAT/NCLC asserted that while automatic enrollment does create challenges, such challenges can be alleviated with robust consumer education.</p> <p>CalAdvocates urged that the Commission continue to require automatic enrollment in 24-month payment plans due to the increased participation in payment plans and residential arrearages remain high compared with pre-COVID-19 arrearages.</p> <p>The Commission agreed with TURN that automatic enrollment should not be required. Additionally, the Commission adopted TURN's recommendation to require the Large Utilities to offer 24-month payment plans.</p>	<ul style="list-style-type: none"> • D.23-08-049, pp. 6-7. • D.23-08-049, p. 8. • TURN's Reply Comments (August 19, 2022) p.1. <ul style="list-style-type: none"> • D.23-08-049, p. 7. <ul style="list-style-type: none"> • D.23-08-049, pp. 7-8. <ul style="list-style-type: none"> • D.23-08-049, p. 10. 	<p>Verified</p> <p>Verified</p> <p>Verified</p> <p>Verified</p> <p>Verified</p>
<p><u>2. Memorandum Account Treatment of Implementation Costs</u></p> <p>SCE, SDG&E and SoCalGas requested recovery of implementation costs of the 24-month payment plans through their residential disconnections memorandum accounts. In addition, SoCalGas requested cost recovery for implementation of the requirement to contact customers about missed payments.</p> <p>TURN strongly opposed the requests for memorandum account treatment of implementation costs, arguing that it does not meet the requirements for memorandum</p>	<ul style="list-style-type: none"> • D.23-08-049, p. 28. <ul style="list-style-type: none"> • D.23-08-049, p. 28. • TURN Reply Comments (August 	<p>Verified</p> <p>Verified</p>

<p>account treatment, including not being reasonably foreseen in the utility's last General Rate Case and being substantial enough to be worth the effort of processing a memorandum account.</p> <p>The Commission agreed with TURN in that these costs do not meet the Commission's criteria for cost recovery through a memorandum account. Thus, the Commission asked the utilities to request cost recovery for implementation costs through their General Rate Case applications.</p>	<p>14, 2023) on PD, pp. 1-2</p> <ul style="list-style-type: none"> • D.23-08-049, p. 28. 	<p>Verified</p>
<p><u>3. Consideration of Large Utilities' disconnection rate cap extension</u></p> <p>TURN was the only party who suggested that the Commission should consider whether to extend the Large Utilities' disconnection rate caps established in D.20-06-003 before the caps expire at the end of 2024.</p> <p>PG&E opposed to considering this issue, arguing that it is out of scope of this proceeding because SB 598 does not require reductions of disconnections after January 1, 2024.</p> <p>The Commission decided to consider whether to extend or modify the Large Utilities' disconnection rate caps established in D.20-06-003 as an issue in the scope of Phase 2 of this proceeding.</p>	<ul style="list-style-type: none"> • D.23-08-049, p. 25. • TURN Reply Comments (September 25, 2023) on PD, p. 5 • D.23-08-049, p. 25. • D.23-08-049, p. 25. 	<p>Verified</p> <p>Verified</p> <p>Verified</p> <p>Verified</p>

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	Yes
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Yes
c. If so, provide name of other parties: Center for Accessible Technology, PG&E, CalCCA, UCAN, SoCalGas		Noted
d. Intervenor's claim of non-duplication: TURN coordinated with Cal Advocates and Center for Accessible throughout the proceeding, including conferring on strategy, issue positions, and others. As a general matter, TURN either offered unique positions in this proceeding, or, where our positions overlapped with Cal Advocates, Center for Accessible Technology, PG&E, CalCCA, UCAN, or SoCalGas, unique analysis in support or opposition of those positions. For example, TURN was the only party to oppose the recording of implementation costs of the 24-month payment plans to memorandum accounts. In addition, TURN was also the only party to recommend that the Commission should consider whether to extend the Large Utilities' disconnection rate caps, which was established in D.20-06-003 before the caps expire at the end of 2024. (both were adopted by D.23-08-049). The Commission should find that TURN's participation was efficiently coordinated with the participation of Cal Advocates and other intervenors so as to avoid undue duplication and to ensure that to the extent duplication occurred, it served to supplement, complement, or contribute to the showing of the other intervenor. And consistent with such a finding, the Commission should determine that all of TURN's work is compensable consistent with the conditions set forth in Section 1802.5.		Noted

PART III: REASONABLENESS OF REQUESTED COMPENSATION**A. General Claim of Reasonableness (§ 1801 and § 1806):**

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: TURN's request for intervenor compensation seeks an award of approximately \$31,000 as the reasonable cost of our participation in this proceeding. TURN submits that these costs are reasonable in light of the importance of the issues TURN addressed.	Noted

<p>D.23-08-049 addressed important issues related to disconnections, such as whether IOUs should be required to offer 24-month payment plans, whether the AMP program should be extended, and whether the Commission should consider extending the disconnection caps. These are all important issues that have profound effects on many utility customers in California. Often times these policies are the only reasons that some customers are able to keep their lights on and continue to receive essential utility services.</p> <p>As such, the Commission should treat this compensation request as it has treated similar past requests with regard to the difficulty of establishing specific monetary benefits associated with TURN's participation (or that of another intervenor). (<i>See, e.g.</i> D.13-12-027, p. 11 (awarding Sierra Club California intervenor compensation for energy storage policy work in R.10-12-007); D.15-07-028, p.7 (awarding TURN intervenor compensation for energy storage policy work in A.14-02-006 et al.); and D.16-06-027 (awarding TURN intervenor compensation for energy storage policy work in the first Track of the proceeding.)</p> <p>For these reasons, the Commission should find that TURN's efforts have been productive and the requested amount of compensation is reasonable in light of the benefits achieved through those efforts.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>This Request for Compensation includes around 66 hours of TURN's attorney time, the equivalent of about one and half week of full-time work for an individual attorney. TURN's efforts reflected herein resulted in significant contributions to D.23-08-049, detailed above, and encompass the preparation of comments and other filings by TURN.</p> <p>TURN assigned this proceeding to Staff Attorney David Cheng. This request for compensation includes approximately 52 hours of Mr. Cheng's time and 14 hours of other TURN experts' time.</p> <p>TURN suggests that the Commission should find that the number of issues addressed by TURN in this proceeding, the time necessary for preparing various pleadings and testimonies, and the time required by evidentiary hearings warrant finding that the hours spent were reasonable. However, should the Commission believe that more information is needed or that a different approach to discussing the reasonableness of the requested hours is warranted here, TURN requests the opportunity to supplement this section of the request.</p>	<p>Noted</p>

c. Allocation of hours by issue: TURN has allocated all of our attorney and expert time by issue area or activity, as is evident on our attached timesheets (Attachment 2) and in Attachment 3, which shows the allocation of TURN's time included in this request by attorney or expert and issue / activity area. The following codes relate to specific substantive issue and activity areas addressed by TURN.			Noted
Code	Description	Allocation of Time	
Implement	Work related to review of various utility advice letters, protests, resolutions, and others that implement Commission directives.	15.85%	
GP	Work related to general participation in this proceeding (document review, case review, and others)	18.49%	
Report	Work related to reviewing disconnection reports and other PG&E, SCE, SoCalGas and SDG&E's reports	10.19%	
PIPP	Work related to addressing issues regarding Percentage of Income Payment Plan	1.13%	
AMP	Work related to Arrearage Management Program	35.09%	
WS	Work related to participation and preparation of workshops	10.57%	
PD	Work related to the Proposed Decision where not easily allocated to specific issue areas	8.68%	

B. Specific Claim: *

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
David Cheng, TURN Staff Attorney	2022	15.50	\$440.00	D.23-04-22	\$6,820.00	15.50	\$440.00 [1]	\$6,820.00
David Cheng, TURN Staff Attorney	2023	36.25	\$480.00	Res. ALJ-393, 2022 Rate plus 4.5% COLA plus 5% step	\$17,400.00	33.75 [6]	\$480.00 [2]	\$16,200.00

				increase; See Comment 1				
Adria Tinnin, TURN Race Impact Policy Analyst	2022	3.50	\$225.00	D.23-05-031	\$787.50	3.50	\$225.00 [1]	\$787.50
Gabriela Sandoval, TURN Expert	2022	3.00	\$465.00	D.23-04-020	\$1,395.00	3.00	\$465.00 [1]	\$1,395.00
Gabriela Sandoval, TURN Expert	2023	2.25	\$510.00	Res. ALJ- 393, 2022 Rate plus 4.5% COLA plus 5% step increase; See Comment 2	\$1,147.50	2.25	\$510.00 [3]	\$1,147.50
Hayley Goodson, TURN Attorney	2023	1.75	\$625.00	Res. ALJ- 393, 2022 Rate plus 4.5% COLA plus 5% step increase	\$1,093.75	1.75	\$625.00 [4]	\$1,093.75
Jennifer Dowdell, TURN Energy Policy Expert	2022	4.00	\$415.00	D.23-04-022	\$1,660.00	4.00	\$415.00 [1]	\$1,660.00
Subtotal: \$30,303.75						Subtotal: \$29,103.75		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming: Claim Preparation								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Reina Yanagiba, TURN Legal Assistant	2023	6.00	\$47.50	Res. ALJ- 393; See Comment 3	\$285.00	6.00	\$47.50 [5]	\$285.00
David Cheng,	2023	1.00	\$240	½ of Res. ALJ-393, 2022 Rate	\$240.00	1.00	\$240 [2]	\$240.00

TURN Staff Attorney				plus 4.5% COLA plus 5% step increase			
Subtotal: \$525.00						Subtotal: \$525.00	
TOTAL REQUEST: \$30,828.75						TOTAL AWARD: \$29,628.75	
<p>*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.</p> <p>**Reasonable Claim preparation time are typically compensated at ½ of preparer’s normal hourly rate</p>							
ATTORNEY INFORMATION ³							
Attorney		Date Admitted to CA BAR ⁴		Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation		
Hayley Goodson		December 2003		228535	No		
David Cheng		June 2015		303794	No		

C. Attachments Documenting Specific Claim and Comments on Part III:

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Timesheets for TURN's Attorneys and Experts
Attachment 3	TURN Hours Allocated by Issue
Attachment 4	Resume for Reina Yanagiba

³ The Commission has verified the information submitted here.

⁴ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

Comment 1	<p>2023 Hourly Rate for David Cheng</p> <p>TURN requests that the Commission adopt a 2023 hourly rate of \$480 for David Cheng.</p> <p>In D.22-05-027, the Commission adopted a rate of \$425 for Mr. Cheng’s work in 2021, recognizing him as an Attorney – Level III. For 2022, TURN requests that the Commission adjust Mr. Cheng’s authorized 2021 rate by the annual escalation methodology adopted in Res. ALJ-393, which is based on the annual percentage change in the Bureau of Labor Statistics Employment Cost Index, Table 5, for the Occupational Group “Management, Professional, and Related excluding Incentive Paid Occupations.” (Res. ALJ-393, p. 4; Intervenor Compensation Market Rate Study, Final Report, p. 8). The percent change for this occupational group for the 12-months ended December 2021 is 3.3%. See https://www.bls.gov/news.release/eci.t05.htm. The resulting 2022 rate for Mr. Cheng is \$440.</p> <p>The 2023 rate requested by TURN is equal to the rate for Mr. Cheng’s work in 2022, adjusted by both the annual escalation methodology adopted in Resolution (Res.) ALJ-393 and the first 5% step increase for Mr. Cheng in the Attorney – Level III experience tier. The annual escalation rate for 2023 is 4.5%. See https://www.bls.gov/news.release/eci.t05.htm.</p> <p>Res. ALJ-393 permits intervenor representatives to claim up to two 5% annual “step increases” within each labor role experience tier, as long as their final requested rate does not exceed the maximum approved rate for that experience level. (Res. ALJ-393, p. 5). The maximum approved rate for an Attorney – Level III is \$519.48 for work conducted in 2021, which escalates to \$560.77 in 2023 by applying the 3.3% 2022 COLA and then the 4.5% 2023 COLA.</p> <p>The requested 2023 rate for David Cheng of \$480 is below the maximum 2023 rate for an Attorney – Level III.</p>
Comment 2	<p>2023 Hourly Rate for Gabriela Sandoval</p> <p>TURN requests that the Commission adopt a 2023 hourly rate of \$510 for TURN Policy Expert Gabriela Sandoval. This rate is equal to the rate authorized by the Commission in D23-04-020 for Dr. Sandoval’s work in 2022, \$465, adjusted by both the annual escalation methodology adopted in Resolution (Res.) ALJ-393 and the first 5% step increase for Dr. Sandoval in the Public Policy Analyst – Level IV experience tier.</p> <p>The annual escalation methodology adopted in Res. ALJ-393 is based on the annual percentage change in the Bureau of Labor Statistics Employment Cost Index, Table 5, for the Occupational Group “Management, Professional, and Related excluding Incentive Paid Occupations.” (Res. ALJ-393, p. 4;</p>

	<p>Intervenor Compensation Market Rate Study, Final Report, p. 8). The percent change for this occupational group for the 12-months ended December 2022 is 4.5%. See https://www.bls.gov/news.release/eci.t05.htm.</p> <p>Res. ALJ-393 permits intervenor representatives to additionally claim up to two 5% annual “step increases” within each labor role experience tier, as long as their final requested rate does not exceed the maximum approved rate for that experience level. (Res. ALJ-393, p. 5). The maximum approved rate for a Public Policy Analyst – Level IV is \$493.98 for work conducted in 2021, which escalates to \$533.24 in 2023 by applying the 3.3% 2022 COLA and then the 4.5% 2023 COLA.</p> <p>The requested 2023 rate for Dr. Sandoval of \$510 is below the maximum 2023 rate for a Public Policy Analyst – Level IV.</p> <p>TURN also notes that the requested rate is below the <i>minimum</i> rate for a Public Policy Analyst – Level V in 2023 of \$531.09 (escalated from the bottom rate of \$491.99 in 2021). As explained in TURN’s initial hourly rate request for Dr. Sandoval under the Commission’s new hourly rate framework adopted in Res. ALJ-393 (presented in R.21-02-014), as of January 1, 2021, Dr. Sandoval had roughly 15 years of professional experience directly relevant to her work before the Commission as a public policy expert, including 7 years as a Sociologist, nearly 3 ½ years at the Insight Center working on public policies impacting economic insecurity, and more than 4 ½ years working at TURN on utility public policy issues. By 2023, Dr. Sandoval had 2 additional years of public policy analysis experience, putting her in the Level V experience tier (7 years + 3 ½ years + 6 ½ years = 17 years). For this reason, TURN offers the comparison between the requested 2023 hourly rate and the range for a Public Policy Analyst – Level V.</p>
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Comment 3	<p>2023 Hourly Rate for Reina Yanagiba</p> <p>Pursuant to the requirements of ALJ-393, TURN hereby submits its request for a 2023 hourly rate for TURN’s Legal Assistant Reina Yanagiba.</p> <p>Intervenor Representative: Reina Yanagiba Labor Role: Paralegal Level: I 2021 Hourly Rate Range: \$88.53 - \$141.49 2023 Hourly Rate Range: \$95.56 - \$152.73 Requested Hourly Rate: \$95 Current Resume: See Attachment 4. Justification for the Requested Hourly Rate:</p> <p>Ms. Yanagiba joined TURN in October 2022. She supports TURN’s legal work by performing paralegal tasks, as well as by providing other types of support. While Ms. Yanagiba’s duties are not exclusively focused on paralegal duties, Ms. Yanagiba regularly works with TURN’s attorneys, experts, and consultants to assist with document review, discovery production and management, and preparation of expert testimony, briefs, and supporting tables. She has also begun assisting TURN with the preparation of ex parte notices and intervenor compensation requests. Prior to joining TURN, Ms. Yanagiba spent two summers working as a Legal Assistant in Japan.</p> <p>Ms. Yanagiba has a B.A. in English and Philosophy with a Legal Studies minor from Lake Forest College in Illinois. She is currently enrolled in the ABA Certified Paralegal Training Program at the University of California, Los Angeles.</p> <p>TURN requests an hourly rate of \$95 for Ms. Yanagiba, which is the bottom of the range for a Paralegal – Level I in 2023. A Level I Paralegal must have a Bachelor’s Degree and 0-1 year of experience according to the Market Rate Study adopted by Resolution ALJ-393. TURN submits that the requested rate is reasonable, given Ms. Yanagiba’s education and experience.</p>
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D. CPUC Comments, Disallowances, and Adjustments

Item	Reason								
[1] 2022 Hourly Rates for Cheng, Tinnin, Sandoval and Dowdell	<p>D.23-04-022 and D.23-05-031 established the following 2022 rates for these representatives:</p> <table> <tr> <td>Cheng</td><td>\$440</td></tr> <tr> <td>Tinnin</td><td>\$225</td></tr> <tr> <td>Sandoval</td><td>\$465</td></tr> <tr> <td>Dowdell</td><td>\$415</td></tr> </table>	Cheng	\$440	Tinnin	\$225	Sandoval	\$465	Dowdell	\$415
Cheng	\$440								
Tinnin	\$225								
Sandoval	\$465								
Dowdell	\$415								

	We apply the same 2022 hourly rates to these representatives here without further discussion.
[2] 2023 Hourly Rate for Cheng	<p>TURN requests that the Commission adopt a 2023 hourly rate of \$480 for Cheng. TURN states that the rate request by TURN is equal to the 2022 rate of \$440 previously adopted by the Commission, applying Cheng's first 5% step increase authorized in Resolution ALJ-393; and then including the 2023 annual escalation rate of 4.5%.</p> <p>$\\$440 \times 1.0946 = \\481.62, rounded to nearest \$5 increment = \$480</p> <p>We approve the requested 2023 hourly rate of \$480 for Cheng.</p>
[3] 2023 Hourly Rate for Sandoval	<p>TURN requests that the Commission adopt a 2023 hourly rate of \$510 for Sandoval. TURN states that the rate request by TURN is equal to the 2022 rate of \$465 previously adopted by the Commission, applying Sandoval's first 5% step increase authorized in Resolution ALJ 393, and then including the 2023 annual escalation rate of 4.5%.</p> <p>$\\$465 \times 1.0946 = \\508.98, rounded to nearest to \$5 increment = \$510</p> <p>We approve the requested 2023 hourly rate of \$510 for Sandoval.</p>
[4] 2023 Hourly Rate for Goodson	<p>TURN requests that the Commission adopt a 2023 hourly rate of \$625 for Goodson. D.23-01-015 adopted a 2022 hourly rate of \$570 for Goodson. TURN states that the 2023 hourly rate of \$625 is equal to the 2022 rate of \$570 previously adopted by the Commission, applying Goodson's first 5% step increase authorized in Resolution ALJ 393, and then including the 2023 annual escalation rate of 4.5%</p> <p>$\\$570 \times 1.0946 = \\623.92, rounded to nearest \$5 increment = \$625</p> <p>We approve the requested 2023 hourly rate \$625 for Goodson.</p>
[5] 2023 Hourly Rate for Yanagiba	<p>Yanagiba has no previously approved rate for work before the Commission. Yanagiba has a B.A. in English and Philosophy with a Legal Studies minor from Lake Forest College in Illinois. Yanagiba is currently enrolled in the ABA Certified Paralegal Training Program at the University of California, Los Angeles. Yanagiba joined TURN two years ago. Prior to joining TURN, Yanagiba spent two summers working as a Legal Assistant in Japan.</p> <p>TURN requests an hourly rate of \$95 for Yanagiba. For a Level I Paralegal, one must have a Bachelor's Degree and 0-1 year of experience according to the Market Rate Study adopted by Resolution ALJ-393. According to the Market Rate Study, the 2023 Hourly Rate Range for Paralegals with 0-1 years of experience is \$97.52-\$150.48. Given Yanagiba's education and experience, we find the requested 2023 rate of \$95.00 reasonable and adopt the rate as requested.</p>
[6] 2023 Disallowances for Cheng	We disallow 2.50 hours from Cheng's 2023 hours for "reviewing parties reply comments" on the following dates: 1/10/23, 3/13/23, 5/4/23 and 8/14/23 as they did not make a substantial contribution to the final decision.

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?	No
B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	Yes

FINDINGS OF FACT

1. The Utility Reform Network has made a substantial contribution to D.23-08-049.
2. The requested hourly rates for The Utility Reforms Network representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$29,628.75.

CONCLUSION OF LAW

1. The Claim satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. The Utility Reform Network is awarded \$29,628.75.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Gas Company, Southern California Edison Company, and San Diego Gas & Electric Company shall pay The Utility Reform Network their respective shares of the award, based on their California-jurisdictional gas and electric revenues for the 2023 calendar year, to reflect the year in which the proceeding was primarily litigated. If sch data is unavailable, the most recent electric and gas 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 January 30, 2024, the 75th day after the filing of The Utility Reform Network's request, and continuing until full payment is made.

3. The comment period for today's decision is waived.

This decision is effective today.

Dated April 18, 2024, at Sacramento, California.

ALICE REYNOLDS

President

DARCIE L. HOUCK

JOHN REYNOLDS

KAREN DOUGLAS

Commissioners

Commissioner Matthew Baker recused himself from this agenda item and was not part of the quorum in its consideration.

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:	D2404030	Modifies Decision?	No
Contribution Decision:	D2308049		
Proceeding:	R1807005		
Author:	ALJ Stephanie Wang		
Payees:	Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company, and San Diego Gas & Electric Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	11-06-2023	\$30,828.75	\$29,628.75	N/A	See Part III D. CPUC Comments, Disallowances, and Adjustments

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
David	Cheng	Attorney	\$440	2022	\$440.00
David	Cheng	Attorney	\$480	2023	\$480.00 ⁵
Adria	Tinnin	Impact Policy Analyst	\$225	2022	\$225.00
Gabriela	Sandoval	Expert	\$465	2023	\$465.00
Gabriela	Sandoval	Expert	\$510	2023	\$510.00 ⁶
Hayley	Goodson	Attorney	\$625	2022	\$625.00 ⁷
Dowdell	Jennifer	Energy Policy Expert	\$415	2022	\$415.00
Reina	Yanagiba	Paralegal	\$ 95	2023	\$ 95.00 ⁸

(END OF APPENDIX)

⁵ This includes a first 5% step increase for Cheng.

⁶ This includes a first 5% step increase for Sandoval.

⁷ This includes a first 5% step increase for Goodson.

⁸ This is Yanagiba's first established rate before the Commission.