

Decision \_\_\_\_\_

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

Implementing Senate Bill 846  
Concerning Potential Extension of  
Diablo Canyon Power Plant Operations.

Rulemaking 23-01-007

**DECISION GRANTING COMPENSATION TO ALLIANCE FOR NUCLEAR  
RESPONSIBILITY FOR SUBSTANTIAL CONTRIBUTION TO  
DECISION 25-06-002**

<b>Intervenor:</b> Alliance for Nuclear Responsibility	<b>For contribution to Decision (D.) 25-06-002</b>
<b>Claimed:</b> \$46,141.68	<b>Awarded:</b> \$34,835.55
<b>Assigned Commissioner:</b> Karen Douglas	<b>Assigned ALJ:</b> Nilgun Atamturk

**PART I: PROCEDURAL ISSUES**

<b>A. Brief description of Decision:</b>	D.25-06-002 completed Phase 2 of the SB 846 implementation rulemaking, which solicited party proposals on several issues that had not been conclusively resolved in Phase 1. D.25-06-002 determined that PG&E should consider affordability as a guiding principle for its annual Volumetric Performance Fee (“VPF”) spending plan; directed PG&E to follow certain reporting protocols in its annual Diablo Canyon cost recovery filings; and approved a new funding methodology for the Diablo Canyon Independent Safety Committee.
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:<sup>1</sup>**

	Intervenor	CPUC Verification
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	3/17/2023	Verified
2. Other specified date for NOI:	7/25/2024	Published ruling on 6/25/2024 specified A4NR as one of the eligible parties for IComp to file NOI within 30 days after the issuance of this Amended Scoping Memo
3. Date NOI filed:	7/24/2024	Verified
4. Was the NOI timely filed?		Yes
<b>Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):</b>		
5. Based on ALJ ruling issued in proceeding number:	R.23-01-007	Verified
6. Date of ALJ ruling:	6/14/2023	Verified
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
<b>Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):</b>		
9. Based on ALJ ruling issued in proceeding number:	R.23-01-007	Verified
10. Date of ALJ ruling:	6/14/2023	Verified
11. Based on another CPUC determination (specify):		D.24-04-039 (issued 4/18/24) satisfied the ruling requirement from 6/14/23
12. Has the Intervenor demonstrated significant financial hardship?		Yes

<sup>1</sup> All statutory references are to California Public Utilities Code unless indicated otherwise.

	Intervenor	CPUC Verification
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.25-06-002	Verified
14. Date of issuance of Final Order or Decision:	6/20/2025	Verified
15. File date of compensation request:		8/19/2025
16. Was the request for compensation timely?		Yes

**C. Additional Comments on Part I:**

#	Intervenor's Comment(s)	CPUC Discussion
B.2.	The June 25, 2024 Assigned Commissioner's Amended Scoping Memo and Ruling, at p. 4, set a deadline of July 25, 2024, for the NOI.	Verified

**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(s)	CPUC Discussion
<p>1. <u>Scoping Issue #1:</u> A4NR emphasized that PG&amp;E's forecast projected substantial annual deficits in each year from 2024 thru 2030 after netting operating costs against market revenues (Proposals, p. 2; Reply Comments on Proposals, p.2); urged that any "public purpose priorities" funded by VPFs prioritize capital expenditures, particularly those for the distribution and transmission systems (Proposals, pp. 4 – 5; Opening Comments on Proposals, p. 2; Reply Comments on Proposals, pp. 2, 4); and recommended that the Commission defer ruling on certain issues dependent upon statutory construction until after completion of judicial review of PG&amp;E's writ challenge to D.23-12-036 (Proposals, pp. 2 – 3).</p>	<p>D.25-06-002 acknowledges A4NR's proposals (at pp. 7, 9 – 11, Finding of Fact 5), including them among those that "deserve serious consideration by PG&amp;E in their VPF spending plans." D.25-06-002 (at p. 16) "strongly encourages PG&amp;E to take their underlying reasoning into account as a guiding principle during the VPF planning process," and specifically identifies focus on the distribution and transmission systems, and capital investments, as "benefitting ratepayers through the efficient spending of VPFs in ways that reduce upward pressure on rates." D.25-06-002 reiterates (at p. 17) its encouragement that PG&amp;E consider "VPF spending on capital projects, particularly distribution and transmission projects" as a means "to reduce upward rate pressure." D.25-06-002 adopts affordability as a guiding principle for VPF spending (at p. 17, Conclusions of Law 3 and 4, and Ordering Paragraph 2). Although not specifically addressing A4NR's recommendation to defer ruling on certain issues dependent upon statutory construction, D.25-06-002 was not issued until after PG&amp;E's petition for a writ of review of D23-12-036 had been rejected by both the Court of Appeal and the Supreme Court.</p>	<p>Verified</p>

<p>2. <u>Scoping Issue #2:</u> A4NR recommended that the Commission defer ruling on certain issues dependent upon statutory construction until after completion of judicial review of PG&amp;E's writ challenge to D.23-12-036 (Proposals, p. 6), but indicated that it found nothing objectionable in PG&amp;E's proposed review criteria for the annual compensation report (Opening Comments on Proposals, p. 4).</p>	<p>D.25-06-002 (at p. 22) acknowledges A4NR's recommendation to defer ruling on certain issues dependent upon statutory construction, while noting that "it does not object to PG&amp;E's proposal." D.25-06-002 was not issued until after PG&amp;E's petition for a writ of review of D23-12-036 had been rejected by both the Court of Appeal and the Supreme Court.</p>	<p>Verified</p>
<p>3. <u>Scoping Issue #3:</u> A4NR's response to the February 7, 2024 ALJ Ruling identified term limits for DCISC members as an issue that should be addressed in Phase 2 (Opening Comments on Phase 2 Issues, pp. 2 – 3). A4NR's discussion of the DCISC observed that the existing funding formula had resulted in a 27.8% decline (using CPI) in resources when compared to the 1996 approved amount (Proposals, p. 9).</p>	<p>The Assigned Commissioner's Amended Scoping Memo and Ruling included DCISC matters as Scoping Issue #3. While D.25-06-002 rejected A4NR's proposed term limits (despite agreeing at p. 32 that "there are benefits to structured turnovers"), it approved a revised DCISC funding methodology (at p. 31): "A4NR supports PG&amp;E's proposal to adjust the DCISC funding methodology, which, A4NR notes, addresses A4NR's concern about the 27.8 percent decrease in real-dollar funding for the DCISC from 1996 to 2023."</p>	<p>Verified</p>

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

	Intervenor's Assertion	CPUC Discussion
<p><b>a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?</b></p>	Yes	Verified
<p><b>b. Were there other parties to the proceeding with positions similar to yours?</b></p>	Yes	Verified
<p><b>c. If so, provide name of other parties:</b> TURN, CalCCA, and SBUA.</p>		Verified

	Intervenor's Assertion	CPUC Discussion
<b>a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?</b>	Yes	Verified
<b>d. Intervenor's claim of non-duplication:</b> As reflected in the party filings and D.25-06-002's discussion of them, areas of commonality were relatively limited and each party voiced a distinctly different perspective even when in broad agreement. Where positions were similar, they were more accurately described as complementary than duplicative.		Noted

### PART III: REASONABLENESS OF REQUESTED COMPENSATION

#### A. General Claim of Reasonableness (§ 1801 and § 1806):

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: Elevating affordability as "the guiding principle" by which to evaluate PG&E's future proposed VPF spending plans in the annual cost forecast proceedings will, as noted in D.25-06-002's Finding of Fact 5, "reduce upward pressure on rates." Modifying the funding methodology for DCISC budgets to correct a 27.8% inflation-adjusted decline since 1996 will provide resources to better evaluate the safety of future operations at the plant. Although uncertainties make these benefits impossible to quantify with precision, the qualitative benefit from even marginal success in either of these two Commission objectives would greatly exceed the modest cost of A4NR's intervention.	Noted
b. Reasonableness of hours claimed: A4NR submitted three rounds of Opening and Reply Comments (on the topics to be considered in Phase 2, on the Proposals sponsored by other parties, and on the Proposed Decision) as well as detailed Proposals of its own. Each A4NR filing was succinct and narrowly focused on specific aspects of the identified Scoping Issues. The time sought for reimbursement reflects an efficient application of knowledge gained by A4NR during the earlier Phase 1 of this proceeding.	Noted
c. Allocation of hours by issue: Scoping Issue #1, 37.3 hours (59.2%); Scoping Issue #2, 9.0 hours (14.3%); Scoping Issue #3, 9.5 hours (15.0%); General (including claim preparation) 7.25 hours (11.5%).	Noted

**B. Specific Claim:\***

CLAIMED					CPUC AWARD			
<b>ATTORNEY, EXPERT, AND ADVOCATE FEES</b>								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
John Geesman (See Comment 4 below)	2025	13.37	795	D.25-05-017 plus 3.46% ALJ-393 COLA rounded to nearest \$5	10,629.15	9.87 [1]	\$795 [2,5]	\$7,846.65
John Geesman	2024	42.39	770	D.25-05-017	32,640.03	31.32 [3]	\$770 [4,5]	\$24,116.40
<i><b>Subtotal: \$43,269.18</b></i>						<i><b>Subtotal: \$31,963.05</b></i>		
<b>INTERVENOR COMPENSATION CLAIM PREPARATION **</b>								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
John Geesman	2025	6.5	397.50	one-half of COLA-adjusted rate approved in D.25-05-017	2,583.75	6.5	\$397.50 [2,5]	\$2,583.75
John Geesman	2024	.75	385	one-half of rate approved in D.25-05-017	288.75	0.75	\$385.00 [4,5]	\$288.75
<i><b>Subtotal: \$2,872.50</b></i>						<i><b>Subtotal: \$2,872.50</b></i>		
<i><b>TOTAL REQUEST: \$46,141.68</b></i>						<i><b>TOTAL AWARD: \$34,835.55</b></i>		

\*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

\*\*Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate

CLAIMED		CPUC AWARD	
<b>ATTORNEY INFORMATION</b>			
Attorney	Date Admitted to CA BAR <sup>2</sup>	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
John Geesman	June 28, 1977	74448	No

**C. Attachments Documenting Specific Claim and Comments on Part III<sup>3</sup>:**

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Time Records of John Geesman
3	John Geesman is a consultant to A4NR, not a staff member. His 2012 contingent fee retainer agreement with A4NR, which remains in full force and effect, was determined by D.25-05-017 to satisfy Commission policy on consultant compensation: "Geesman has been hired on a contingency basis, where the consultant has not billed or collected compensation for the work performed until the final award is given. Given this contingency, we therefore utilize the reasonable rates established by Resolution ALJ-393 based on Geesman's experience."

**D. CPUC Comments, Disallowances, and Adjustments**

Item	Reason
[1] Reductions of hours for John Geesman in 2025	<p><u>Excessive Hours</u></p> <p>Mr. John Geesman recorded 8.85 hours across three consecutive days for drafting Opening Comments on the Proposed Decision. While the task is compensable, the hours spent are high given the limited scope of revisions and overlap with prior Phase 2 filings.</p> <p>While these arguments were somewhat helpful, the number of hours claimed is excessive relative to their impact. Excessive is when the Commission determines that the time claimed is disproportionate to the reasonable amount of effort required for that contribution. Furthermore, the burden of proof is on the intervenor to show that each of the hours claimed were spent productively making a substantial contribution to the decision. In this instance A4NR</p>

<sup>2</sup> This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

<sup>3</sup> Attachments not included in the final decision.

Item	Reason																		
	<p>failed to prove that. Accordingly, we reduce 2 hours from Mr. John Geesman for excessive hours from below:</p> <table border="1" data-bbox="421 375 1274 544"> <thead> <tr> <th data-bbox="453 384 600 413">Date</th><th data-bbox="600 384 1139 413">Task</th><th data-bbox="1139 384 1274 413">Total</th></tr> </thead> <tbody> <tr> <td data-bbox="453 424 600 454">3/16/2025</td><td data-bbox="600 424 1139 454">Draft Opening Comments on PD</td><td data-bbox="1139 424 1274 454">2.65</td></tr> <tr> <td data-bbox="453 464 600 494">3/15/2025</td><td data-bbox="600 464 1139 494">Draft Opening Comments on PD</td><td data-bbox="1139 464 1274 494">4.75</td></tr> <tr> <td data-bbox="453 506 600 536">3/14/2025</td><td data-bbox="600 506 1139 536">Draft Opening Comments on PD</td><td data-bbox="1139 506 1274 536">1.45</td></tr> </tbody> </table> <p>Mr. John Geesman claimed 2.90 hours for preparing the Reply Comments on the Proposed Decision. While this activity is compensable, the total time claimed is excessive in relation to the brevity of the filing, which consists of approximately one page.</p> <p>While these arguments were somewhat helpful, the number of hours claimed is excessive relative to their impact. Excessive is when the Commission determines that the time claimed is disproportionate to the reasonable amount of effort required for that contribution. Furthermore, the burden of proof is on the intervenor to show that each of the hours claimed were spent productively making a substantial contribution to the decision. In this instance A4NR failed to prove that. Accordingly, we reduce 1.5 hours from Mr. John Geesman for inefficient excessive hours from below</p> <table border="1" data-bbox="421 1100 1274 1184"> <thead> <tr> <th data-bbox="453 1108 600 1138">Date</th><th data-bbox="600 1108 1139 1138">Task</th><th data-bbox="1139 1108 1274 1138">Total</th></tr> </thead> <tbody> <tr> <td data-bbox="453 1148 600 1178">3/23/2025</td><td data-bbox="600 1148 1139 1178">Draft Reply Comments on PD</td><td data-bbox="1139 1148 1274 1178">2.90</td></tr> </tbody> </table> <p>The sum of Mr. John Geesman's total reduction is 3.50 hours in 2025.</p> <p>[2] 2025 hourly rate for John Geesman</p> <p>A4NR has confirmed that Mr. John Geesman is a consultant. Pursuant to Commission policy, the rate requested by an intervenor must not exceed the rate billed to that intervenor by any outside consultant it hires, even if the consultant's billed rate is below the floor for a given experience level.<sup>4</sup> Per the IComp Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§ 1804(d)).</p> <p>Based on the supplemental information A4NR provided, A4NR has confirmed that that per the terms of their contract, Mr. John Geesman has been hired on a contingency basis, where the consultant has not billed or collected compensation for the work performed until the final award is given. Given this contingency, we therefore utilize the reasonable rates established by Resolution ALJ-393 based on Mr. John Geesman's experience.</p>	Date	Task	Total	3/16/2025	Draft Opening Comments on PD	2.65	3/15/2025	Draft Opening Comments on PD	4.75	3/14/2025	Draft Opening Comments on PD	1.45	Date	Task	Total	3/23/2025	Draft Reply Comments on PD	2.90
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<sup>4</sup> D.07-01-009, D.08-04-010, and ALJ Resolution ALJ 235.

Item	Reason																		
	<p>A4NR requested a 2025 hourly rate of \$795.00 for Mr. John Geesman. Given the 2025 Legal – Attorney – Level V rate range is \$584.51 to \$797.23 with a median of \$704.51, we find it reasonable to authorize the maximum allowable 2025 hourly rate of \$795.00 for Mr. John Geesman and adopt it here. The compensation for the preparation of claims is one-half the hourly rate. We apply one-half of Mr. John Geesman’s 2025 hourly rate of \$795.00 for a 2025 rate of \$397.50 for the preparation of claims. The award made herein for the consultant’s contribution shall be passed through in full to the consultant and no portion of this part of the award shall be kept by the intervenor.</p> <p>Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission’s policy on consultant compensation, and the understanding that the consultant has not billed or collected compensation for the work performed until the final award is given.</p>																		
<p>[3] Reduction of hours for John Geesman in 2024</p>	<p><u>Excessive Hours</u></p> <p>Between August 6–13, 2024, Mr. John Geesman claimed 14.43 hours for preparing draft proposals. Although proposal development was central to A4NR’s participation, the hours are excessive given parallel filings by similarly situated intervenors and internal overlap across issue areas.</p> <table border="1" data-bbox="412 1129 1277 1383"> <thead> <tr> <th data-bbox="412 1129 608 1184">Date</th><th data-bbox="608 1129 1130 1184">Task</th><th data-bbox="1130 1129 1277 1184">Total</th></tr> </thead> <tbody> <tr> <td data-bbox="412 1184 608 1220">8/6/2024</td><td data-bbox="608 1184 1130 1220">Draft Proposals</td><td data-bbox="1130 1184 1277 1220">4.07</td></tr> <tr> <td data-bbox="412 1220 608 1256">8/7/2024</td><td data-bbox="608 1220 1130 1256">Draft Proposals</td><td data-bbox="1130 1220 1277 1256">3.95</td></tr> <tr> <td data-bbox="412 1256 608 1292">8/8/2024</td><td data-bbox="608 1256 1130 1292">Draft Proposals</td><td data-bbox="1130 1256 1277 1292">3.02</td></tr> <tr> <td data-bbox="412 1292 608 1328">8/9/2024</td><td data-bbox="608 1292 1130 1328">Draft Proposals</td><td data-bbox="1130 1292 1277 1328">2.42</td></tr> <tr> <td data-bbox="412 1328 608 1383">8/13/2024</td><td data-bbox="608 1328 1130 1383">Draft Proposals</td><td data-bbox="1130 1328 1277 1383">0.97</td></tr> </tbody> </table> <p>As a result, we reduce 2 hours from John Geesman for inefficient excessive hours from above.</p> <p>Mr. John Geesman recorded 5.45 hours for drafting Opening Comments on the Party Proposals. While this activity is compensable, the total time claimed is excessive in relation to the brevity of the filing, which consists of approximately 5 pages.</p> <p>While these arguments were somewhat helpful, the number of hours claimed is excessive relative to their impact. Excessive is when the Commission determines that the time claimed is disproportionate to the reasonable amount of effort required for that contribution. Furthermore, the burden of proof is on the intervenor to show that each of the hours claimed were spent productively making a substantial contribution to the decision. In this instance A4NR</p>	Date	Task	Total	8/6/2024	Draft Proposals	4.07	8/7/2024	Draft Proposals	3.95	8/8/2024	Draft Proposals	3.02	8/9/2024	Draft Proposals	2.42	8/13/2024	Draft Proposals	0.97
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8/6/2024	Draft Proposals	4.07																	
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9/16/2024	Draft Opening Comments on Party Proposals	4.90													
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	<p>A total of 8.90 hours was recorded for drafting reply comments. These filings were brief and primarily reiterated positions from A4NR's earlier Opening Comments. Duplicative work should be reduced where no new substantive analysis was required.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;"><u>Date</u></th><th style="text-align: center;"><u>Task</u></th><th style="text-align: center;"><u>Total</u></th></tr> </thead> <tbody> <tr> <td style="text-align: center;">9/21/2024</td><td style="text-align: center;">Draft Reply Comments on Party Proposals</td><td style="text-align: center;">2.50</td></tr> <tr> <td style="text-align: center;">9/23/2024</td><td style="text-align: center;">Draft Reply Comments on Party Proposals</td><td style="text-align: center;">5.55</td></tr> <tr> <td style="text-align: center;">9/24/2024</td><td style="text-align: center;">Draft Reply Comments on Party Proposals</td><td style="text-align: center;">0.85</td></tr> </tbody> </table>			<u>Date</u>	<u>Task</u>	<u>Total</u>	9/21/2024	Draft Reply Comments on Party Proposals	2.50	9/23/2024	Draft Reply Comments on Party Proposals	5.55	9/24/2024	Draft Reply Comments on Party Proposals	0.85
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9/23/2024	Draft Reply Comments on Party Proposals	5.55													
9/24/2024	Draft Reply Comments on Party Proposals	0.85													
	<p>Accordingly, we reduce 3 hours from John Geesman for inefficient excessive hours from above.</p> <p><u>Limited Contribution</u></p> <p>Merely supporting the positions of other parties—without offering additional analysis, a distinct perspective, or unique factual or legal contributions—does not constitute a significant contribution. While an intervenor's alignment with a particular position can be helpful in informing the Commission's decision-making process, the hours claimed for such support must be reasonable. Ratepayers should not bear the cost of excessive time spent by an intervenor reiterating arguments that have already been presented by others in the proceeding. Given that A4NR's contribution was limited in addressing scoping issue #2, we reduce 2 hours from Mr. John Geesman's claim in 2024 to reflect the lack of substantial contribution on this issue.</p> <p><u>Out of Scope Efforts</u></p> <p>Mr. John Geesman logged 2.07 hours to review PG&amp;E's petition for writ of review of Commission decisions D.23-12-036 and D.24-05-068. Activities related to judicial appeals are outside the scope of this Commission proceeding and not compensable under Rule 17.4(b). Therefore, the full 2.07 hours are reduced.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;"><u>Date</u></th><th style="text-align: center;"><u>Task</u></th><th style="text-align: center;"><u>Total</u></th></tr> </thead> <tbody> <tr> <td style="text-align: center;">7/3/2024</td><td style="text-align: center;">Review PG&amp;E petition for writ of review</td><td style="text-align: center;">2.07</td></tr> </tbody> </table>			<u>Date</u>	<u>Task</u>	<u>Total</u>	7/3/2024	Review PG&E petition for writ of review	2.07						
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7/3/2024	Review PG&E petition for writ of review	2.07													

Item	Reason
	The sum of Mr. John Geesman's total disallowance is 11.07 hours in 2024.
<p>[4] 2024 hourly rate for John Geesman</p>	<p>A4NR has confirmed that Mr. John Geesman is a consultant. Pursuant to Commission policy, the rate requested by an intervenor must not exceed the rate billed to that intervenor by any outside consultant it hires, even if the consultant's billed rate is below the floor for a given experience level.<sup>5</sup> Per the IComp Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§ 1804(d)).</p> <p>Based on the supplemental information A4NR provided, A4NR has confirmed that that per the terms of their contract, Mr. John Geesman has been hired on a contingency basis, where the consultant has not billed or collected compensation for the work performed until the final award is given. Given this contingency, we therefore utilize the reasonable rates established by Resolution ALJ-393 based on Mr. John Geesman's experience.</p> <p>A4NR requested a 2024 hourly rate of \$770.00 for Mr. John Geesman. Given the 2024 Legal – Attorney – Level V rate range is \$560.95 to \$773.67 with a median of \$680.95, we find it reasonable to authorize the maximum allowable 2024 hourly rate of \$770.00 for Mr. John Geesman and adopt it here. The compensation for the preparation of claims is one-half the hourly rate. We apply one-half of Mr. John Geesman's 2024 hourly rate of \$770.00 for a 2024 rate of \$385.00 for the preparation of claims. The award made herein for the consultant's contribution shall be passed through in full to the consultant and no portion of this part of the award shall be kept by the intervenor.</p> <p>Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission's policy on consultant compensation, and the understanding that the consultant has not billed or collected compensation for the work performed until the final award is given.</p>
<p>[5] Intervenor Responsibility for Transparency and Accuracy in Compensation Requests</p>	<p>The Commission takes this opportunity to remind all intervenors that they bear the burden of providing accurate, complete, and honest information in all compensation requests. The Commission relies on intervenors' good faith representations, particularly regarding consultant agreements and payments, as it does not have the resources to review every contract or non-standard arrangement in detail.</p> <p>Intervenor compensation is funded by ratepayers, and the Commission takes seriously any effort to mislead or obscure the financial basis for a claim.</p>

<sup>5</sup> D.07-01-009, D.08-04-010, and ALJ Resolution ALJ 235.

Item	Reason
	<p>Although no violation of Rule 1.1 has been found in this instance, we remind intervenors that under Rule 1.1, intent to deceive is not required for a violation, misstatements may still be actionable. Dishonest or misleading claims not only risk denial of compensation but may also subject the intervenor to penalties.</p> <p>The Commission has clear authority to audit intervenors' books and records to verify the basis for any award. Intervenors must therefore ensure full transparency regarding actual time spent on issues, consultant fees, payment arrangements, and the actual disbursement of funds. Failure to meet this obligation undermines the integrity of the compensation process and may lead to denial of claims or further enforcement action.</p>

**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))**

<b>A. Opposition: Did any party oppose the Claim?</b>	No
<b>B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?</b>	Yes

**FINDINGS OF FACT**

1. Alliance for Nuclear Responsibility has made a substantial contribution to D.25-06-002.
2. The requested hourly rates for Intervenor's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services, and/or reflect the actual rates billed to, and paid by the intervenor, for consultant services rendered.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$34,835.55.

**CONCLUSION OF LAW**

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

**ORDER**

1. Alliance for Nuclear Responsibility is awarded \$34,835.55.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company shall pay Alliance for Nuclear Responsibility the total award. 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 November 2, 2025, the 75<sup>th</sup> day after the filing of Alliance for Nuclear Responsibility request, and continuing until full payment is made.
3. The comment period for today's decision is waived.

This decision is effective today.

Dated \_\_\_\_\_, at Sacramento, California.

**APPENDIX**  
**Compensation Decision Summary Information**

<b>Compensation Decision:</b>		<b>Modifies Decision?</b>	No
<b>Contribution Decision(s):</b>	D2506002		
<b>Proceeding(s):</b>	R2301007		
<b>Author:</b>	ALJ Nilgun Atamturk		
<b>Payer(s):</b>	Pacific Gas and Electric Company		

**Intervenor Information**

<b>Intervenor</b>	<b>Date Claim Filed</b>	<b>Amount Requested</b>	<b>Amount Awarded</b>	<b>Multiplier?</b>	<b>Reason Change/Disallowance</b>
Alliance for Nuclear Responsibility	8/19/25	\$46,141.68	\$34,835.55	N/A	<i>See Part III.D, CPUC Comments, Disallowances and Adjustments.</i>

**Hourly Fee Information**

<b>First Name</b>	<b>Last Name</b>	<b>Attorney, Expert, or Advocate</b>	<b>Hourly Fee Requested</b>	<b>Year Hourly Fee Requested</b>	<b>Hourly Fee Adopted</b>
John	Geesman	Consultant	\$795	2025	\$795
John	Geesman	Consultant	\$770	2024	\$770

**(END OF APPENDIX)**