

Decision **PROPOSED DECISION OF ALJ S. GOLDBERG (Mailed 12/11/2025)**

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Green Power Institute
for award of intervenor compensation
for substantial contributions to
Resolutions SPD-29, SPD-30, SPD-31.

Application 25-02-022

**DECISION ON THE GREEN POWER INSTITUTE'S ELIGIBILITY AND
REQUEST FOR INTERVENOR COMPENSATION**

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DECISION ON THE GREEN POWER INSTITUTE'S ELIGIBILITY AND REQUEST FOR INTERVENOR COMPENSATION

Summary

This decision denies the intervenor compensation request submitted by the Green Power Institute (GPI) in Application 25-02-022 for claimed contribution to Resolutions SPD-29, SPD-30, and SPD-31. GPI fails to meet the statutory requirements set forth in Public Utilities Code Sections 1801-1812. Therefore, GPI is not eligible to receive intervenor compensation for its work on the three SPD resolutions.

The proceeding is closed.

1. Background

Public Utilities (Pub. Util.) Code Section 8386(b) requires each regulated electrical utility to annually prepare and submit a Wildfire Mitigation Plan (WMP) to the California Natural Resources Agency, Office of Energy Infrastructure Safety (Energy Safety). Pub. Util. Code Section 8386.3(a) requires Energy Safety to review and approve or deny each WMP within three months of submittal and for the Commission to ratify Energy Safety's actions. In rendering its approval, denial, or modification of the WMPs, Energy Safety is required to consider public comments submitted pursuant to subdivision (d) of Pub. Util. Code Section 8386.

Southern California Edison Company filed its 2025 WMP Update on April 2, 2024; San Diego Gas & Electric Company filed its 2025 WMP Update on

July 5, 2024;¹ and Pacific Gas and Electric Company filed its 2025 WMP Update on July 5, 2024. The Green Power Institute (GPI) was among several parties that provided comments on the utilities' WMP Updates before Energy Safety. On January 17, 2025, the Commission issued Resolution (Res.) SPD-29, SPD-30, and SPD-31 ratifying Energy Safety's approval of the utilities' 2025 WMP Updates.

On February 21, 2025, GPI filed Application (A.) 25-02-022, requesting intervenor compensation for its contributions to Res. SPD-29, SPD-30, and SPD-31.

On June 3, 2025, a prehearing conference was held to discuss the issues of law and fact, determine the need for hearing, and discuss the schedule for resolving A.25-02-022.

On September 9, 2025, the Assigned Commissioner issued a Scoping Memo and Ruling (Scoping Memo) confirming the scope of issues for this proceeding. The Scoping Memo directed GPI to file additional information supporting its eligibility to receive intervenor compensation pursuant to Pub. Util. Code Sections 1801-1812.

On September 16, 2025, an Assistant Chief Administrative Law Judge ruling was issued, directing GPI to file and serve the supplemental and missing information in numerous intervenor compensation claims, including the claim in this application. On September 24, 2025, GPI filed a motion for leave to file responsive confidential information under seal. The motion was granted on

¹ Resubmitted July 5, 2024, following a Notice on Supplemental Reportable Updates for San Diego Gas & Electric Company's 2025 Wildfire Mitigation Plan Update.

September 25, 2025. On October 27, 2025, GPI filed another motion for leave to file confidential information under seal.

Pursuant to the September 9, 2025, Scoping Memo, GPI submitted a supplement to its intervenor compensation claim on September 24, 2025. In the opening paragraph of the supplement, GPI notes “this document addresses issues related to the Pacific Institute’s eligibility to receive intervenor compensation.” The Scoping Memo additionally provided GPI the opportunity to file a brief in this matter, which GPI did not avail itself of.

2. Submission Date

This matter was submitted on September 24, 2025, upon GPI’s filing of supplemental information to its application.

3. Issues Before the Commission

This decision addresses the issues outlined in the September 9, 2025 Scoping Memo.²

1. Is the application timely?
2. Does GPI qualify to receive intervenor compensation pursuant to Pub. Util. Code Sections 1801-1812?
3. Did GPI substantially contribute to Res. SPD-29, SPD-30, and SPD-31?

If GPI is found eligible to receive intervenor compensation, the Commission would then determine if GPI made a substantial contribution to the adoption of Res. SPD-29, SPD-30, and SPD-31.

² September 9, 2025 Assigned Commissioner’s Scoping Memo at 2.

4. Application Timeliness

Pub. Util. Code Section 1804 establishes timeliness standards for applications seeking intervenor compensation. A party who intends to seek compensation must file a notice of intent to claim compensation (NOI) within 30 days of the prehearing conference in the proceeding.³ In proceedings where no prehearing conference is held, the Commission may establish an alternate procedure for filing these requests. Parties may also seek compensation by filing a formal application for compensation, thereby initiating a new formal proceeding.⁴ Claims for compensation must be filed within 60 days of the Commission's final order or decision.⁵ Applications for intervenor compensation are subject to the same 60-day filing deadline.

Here, GPI filed an application seeking intervenor compensation. The Commission issued Res. SPD-29, SPD-30, and SPD-31 on January 17, 2025, and GPI filed its application on February 21, 2025. Pursuant to Pub. Util. Code Section 1804(c) and Section IV of the Intervenor Compensation Program Guide, GPI's application is timely.

5. Eligibility and Compliance with Pub. Util. Code Sections 1801 - 1812

Pub. Util. Code Sections 1801-1812 govern the Commission's intervenor compensation program, including the standards for demonstrating customer status, significant financial hardship, and substantial contribution.

³ Pub. Util. Code Section 1804(a)(1).

⁴ The Intervenor Compensation Program Guide, Section IV.

⁵ Pub. Util. Code Section 1804(c), and Rule 17.3.

In its application, GPI states it is a program of the Pacific Institute for Studies in Development, Environment and Security (Pacific Institute). It is not a separate or independent entity and does not conduct business outside of or apart from the Pacific Institute. GPI has no articles of incorporation, bylaws, board of directors, members, donors, or bank accounts of its own. Rather, GPI was a registered fictitious business name of the Pacific Institute, and GPI claims to simply be the name of the Pacific Institute's renewable energy program. GPI confirms that it is a part of the Pacific Institute.⁶ GPI also provided a "Letter of Attestation to Accompany Request for Additional Information for the Intervenor Compensation Application of the Green Power Institute," (Attestation Letter), signed by Peter Stanga, the Chief Operating Officer/Chief Financial Officer at the Pacific Institute, dated September 19, 2025. The Attestation Letter reiterated that GPI is a renewable energy program within the Pacific Institute and is not an independent organization. GPI operates under the Institute's oversight, with Gregory Morris serving as Program Manager and reporting to the Institute's COO/CFO, Peter Stanga. Peter Stanga also attests that all financial matters are managed through the Pacific Institute's finance department.⁷

Based on this description, GPI's own confirmation that it is part of the Pacific Institute, and given that all the information provided by GPI originates from the Pacific Institute (bylaws to establish customer status and financial statements to support a claim of significant financial hardship), we will evaluate

⁶ GPI Supplement to A.25-02-022 at 1.

⁷ Attestation Letter at 1.

GPI and the Pacific Institute as the same entity and will determine whether the Pacific Institute demonstrates customer status and significant financial hardship. We also note that per county records, the fictitious business name, Green Power Institute, expired in 2018.⁸

Separately, we note that Peter Stanga's signature on the Attestation Letter could not be verified. The document appears to contain a copied and pasted image of a signature rather than a traceable digital signature. Rule 1.8 of the Commission's Rules of Practice and Procedures (Rules) provides that a signature on a document certifies that the signer has read the document, knows its contents, believes the facts stated are true to the best of their knowledge, and has the authority to sign on behalf of the entity. The Rule also permits electronic signatures in e-filed documents, provided that the signer retains the signed original and can produce it upon request by the Administrative Law Judge. We have not been able to verify the signature, but in this instance, and in order to expedite this proceeding, we are not requesting GPI/ Pacific Institute to submit the original signed copy at this time.

5.1. Customer Status

Pub. Util. Code Section 1802(b)(1) defines a "customer" as any of the following: (A) a participant representing consumers, customers, or subscribers of any electrical, gas, telephone, telegraph, or water corporation that is subject to

⁸ At page 1 of the filed supplemental statement, GPI states they are "a registered fictitious business name of the Pacific Institute." Public records found at Alameda County Clerk-Recorder Office's Fictitious Business Name (FBN) search (https://rechart1.acgov.org/BusinessLicense/SearchEntry.aspx?cabinet=LICENSES_FBN) reflect File Number 479408, Green Power Institute, was active from 6/11/2013 to 6/11/2018 and is currently expired.

the jurisdiction of the commission (customer category 1); (B) a representative who has been authorized by actual customers to represent them (customer category 2); and (C) 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 (customer category 3). A customer does not include any state, federal, or local government agency, any publicly owned public utility, or any entity that, in the commission's opinion, was established or formed by a local government entity for the purpose of participating in a commission proceeding.

In its application, GPI references a prior ruling issued in Rulemaking (R.) 22-10-010 (R.22-10-010 Ruling) to establish its Category 3 customer status under Pub. Util. Code Section 1802(b). The R.22-10-010 Ruling determined that GPI demonstrated status as a customer based on the information provided then but directed GPI to file supplemental information to support its statements of significant financial hardship. GPI filed their supplement on June 22, 2023.

In GPI's supplement filed on September 24, 2025 in this proceeding, GPI states that Article 2, Section 1 (d) in the Pacific Institute's bylaws authorizes the Pacific Institute "to participate in regulatory and public proceedings by providing information about scientific, technical, and economic implications of public-policy options on behalf of the environmental interests of citizens, including but not limited to community-based organizations, individual utility

customers, and individual end-use consumers.”⁹ GPI also claims that its bylaws “authorizes the Pacific Institute, including its renewable energy program, GPI, to represent the interests of residential customers.”¹⁰

However, upon reviewing Article 2, Section 1 (d) of the bylaws filed in this proceeding, the primary objectives and purposes of the Pacific Institute are stated as “to participate in regulatory and public proceedings by providing information about scientific, technical, and economic implications of public-policy options.”¹¹ Nowhere in the bylaws is there any indication that the Pacific Institute, and/or GPI, are authorized to represent the interests of residential customers or on behalf of the environmental interests of citizens, including but not limited to community-based organizations, individual utility customers, and individual end-use consumers. In fact, residential customers are not mentioned anywhere in the bylaws.

GPI also states in their NOI that “the Pacific Institute has more than *125 members* who are California residential customers of the regulated gas and electric utility companies. The Pacific Institute represents the interests of its members by conducting research into complex issues with important environmental implications, and applying that research in the public-policy arena.”¹² GPI also states that the donors to the Pacific Institute are their

⁹ GPI Supplement to A.25-02-022 at 2.

¹⁰ *Ibid.*

¹¹ Amended and Restated Bylaws of the Pacific Institute filed with the Commission on September 24, 2025, Article 2, Section 1(d).

¹² GPI NOI at 3-4.

“members.”¹³ However, Article 3, Section 1 of the Pacific Institute bylaws state that “This corporation shall have no “members” within the meaning of Section 5056 of the California Nonprofit Public Benefit Corporation Law. Pursuant to Section 5310(b) of the California Nonprofit Public Benefit Corporation Law, any action which would otherwise, under law or the provisions of the Articles of Incorporation of Bylaws of this corporation, require approval by a majority of all members or approval by the members, shall only require the approval of the Board of Directors.”¹⁴

Despite the discrepancies regarding whether the Pacific Institute or GPI are authorized to represent customers, or whether they have members as claimed in GPI’s application, we rely on the bylaws submitted with this application, and determine that the Pacific Institute, and GPI, do not have the authority to represent the interests of residential customers or the environmental interests of citizens, including but not limited to community-based organizations, individual utility customers, and individual end-use consumers. In addition, the bylaws confirm that they do not have any members¹⁵ (as further discussed below). Even assuming that GPI had members, it only provided evidence of one donor who is a California resident and potentially a customer of a Commission regulated

¹³ GPI Supplement to A.25-02-022 at 5.

¹⁴ Amended and Restated Bylaws of the Pacific Institute filed with the Commission on September 24, 2025, Article 3, Section 1.

¹⁵ Amended and Restated Bylaws of the Pacific Institute filed with the Commission on September 24, 2025, Article 3, Section 1.

utility.¹⁶ Accordingly, we find that the Pacific Institute, and GPI, do not meet the customer status eligibility criteria established in Pub. Util. Code 1802(b)(1)(C).

5.2. Significant Financial Hardship

Although the failure to meet the customer status eligibility criteria is fatal to GPI's application, for completeness, the Commission will assess GPI's significant financial hardship claim. Pursuant to Pub. Util. Code Section 1802(h), "significant financial hardship" means either that 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, or that, 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.

To support its claim of significant financial hardship in this application, GPI submitted the Pacific Institute's financial records for years 2022-2024, and stated that "the Pacific Institute cannot afford, without undue hardship, to pay for the costs of the effective participation of our staff and professionals in this or other Commission proceedings without participating in the intervenor compensation program. Because the nature of our participation focuses on the technical and environmental impacts of the matters under consideration in this proceeding, the direct economic impacts on the Pacific Institute and its donors and members are anticipated to be negligible."¹⁷

¹⁶ GPI Supplement to A.25-02-022.

¹⁷ GPI Supplement to A.25-02-022 at 4.

Additionally, GPI checked all but one of the boxes on its NOI to claim significant financial hardship on the following basis:

- 1) “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,”
- 2) “The customer cannot afford, without undue hardship, to pay the costs of effective participation,” and
- 3) A “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,”¹⁸ referencing a ruling issued in R.22-10-010, in which GPI was found eligible for intervenor compensation.

5.2.1. Members

As mentioned in section 5.1 above, GPI provides conflicting and confusing statements regarding the customers it claims to represent and the organization’s membership.

In its NOI, GPI asserts that “[t]he Pacific Institute has more than 125 members who are California residential customers of the regulated gas and electric utility companies.”¹⁹ However, the bylaws filed with this application, confirm that the Pacific Institute has no “members.”²⁰

¹⁸ GPI NOI at 6.

¹⁹ GPI NOI at 3.

²⁰ Amended and Restated Bylaws of the Pacific Institute filed with the Commission on September 24, 2025, Article 3, Section 1.

In its supplement, GPI further states that it has no donors and members of its own, but acknowledges that while the Pacific Institute has donors, it “technically has no “Members,” as “Members” are prohibited by Pacific Institute bylaws.” GPI goes on to further claim that the bylaws specify that “The corporation’s individual financial contributors constitute its non-voting contributing membership.”²¹ We note, however, that the bylaws filed with this application on September 24, 2025 confirm that the Pacific Institute has no members and makes no reference to individual financial contributors being considered non-voting contributing members.

Despite the various conflicting and confusing statements made, we conclude that GPI has no members or donors of its own, as GPI itself has confirmed. The bylaws filed with this application also confirm that the Pacific Institute has no members.

5.2.2. California Residential Customers as Donors/Members

In its supplement, GPI claims that while both GPI and the Pacific Institute have no members, the donors to the Pacific Institute are essentially their “members.”²² While we have already determined that GPI and the Pacific Institute do not meet the customer status eligibility criteria, for the sake of thoroughness, we will also assess whether GPI would qualify under the alternative scenario where GPI/ Pacific Institute have the authority per their

²¹ GPI Supplement to A.25-02-022 at 5.

²² GPI Supplement to A.25-02-022 at 5.

bylaws to represent residential customers, and where the Pacific Institute's donors are members as claimed.

GPI states in their NOI that "the Pacific Institute has more than 125 members who are *California residential customers of the regulated gas and electric utility companies*."²³ GPI provided, under seal, a list of the Pacific Institute's donors for years 2022 - 2024. For purposes of this analysis, and under the scenario where the Pacific Institute's donors are taken as their members, we will review the donor list and evaluate whether the economic interests of the Pacific Institute's donors are small in comparison to the cost of effective participation.

In reviewing the donor list, we found that despite claiming that the Pacific Institute has more than 125 members who are *California residential customers of the regulated gas and electric utility companies*, only one individual was listed as having a California address, (however that individual's affiliation was not identified). Many of the other remaining donors on the list were corporations and foundations, and even at that, only four had California addresses. None of the California entities had listed affiliations. Among those corporations, several are publicly traded companies.

In the case of a group or organization claiming to represent residential customers, Pub. Util. Code Section 1802(b)(1) specifies that such customers must be residential or commercial customers who receive bundled electric service from an electrical corporation. GPI misrepresents its "members" as California residents. Rather than having actual California residential customers of

²³ GPI NOI at 3-4.

regulated gas and electric utility companies, the majority of their “members” are comprised of large corporations, foundations and other publicly traded companies. Representing these types of entities before the Commission in proceedings does not qualify GPI or the Pacific Institute as a Category 3 customer.

Therefore, even assuming, *arguendo*, that GPI and the Pacific Institute’s bylaws give them authority to represent the interests of residential customers, or the environmental interests of citizens, and we consider the Pacific Institute’s donors to be “members,” the Commission would still find GPI and the Pacific Institute ineligible due to concerns over the membership being comprised of mainly large corporations, foundations and other publicly traded companies, rather than actual California residential customers.

5.2.3. Claims of Undue Hardship

Lastly, GPI points to their intervenor compensation award amounts received in 2022 – 2024 to support its claim of significant financial hardship. Specifically, GPI states that it was awarded \$591,942.58 in 2022, \$703,772.24 in 2023, and \$520,755.41 in 2024,²⁴ and claims that given these costs, the Pacific Institute cannot afford, without undue hardship, to pay for the costs of effective participation of their staff and professionals in this or other Commission proceedings without participating in the intervenor compensation program.²⁵

We note that in listing the awards received by year, GPI did not clarify that these yearly totals correspond to participation in proceedings that often span

²⁴ GPI Supplement to A.25-02-022 at 3-4.

²⁵ GPI Supplement to A.25-02-022 at 4.

multiple years, and the related work was not necessarily performed in the year the award was granted. As such, the yearly award totals reported above do not accurately reflect the extent of financial hardship in any specific year. To provide a more accurate picture of the “cost of participation,” each award should be allocated over the duration of GPI’s participation in the corresponding proceedings. For example, the \$591,942.58 amount awarded in 2022 should be allocated over the number of years during which those proceedings took place. The \$591,942.58 paid to GPI in 2022 actually covered four years of work in various proceedings that was paid out in the year 2022. Therefore, reflecting the entire award in the year it was paid does not provide an accurate representation of significant financial hardship.

Further, the Commission’s past awards of intervenor compensation do not evince a financial hardship, nor is the Commission bound by its prior actions. Indeed, GPI has provided new information in this proceeding which the Commission did not have available to it in its prior considerations of requests for intervenor compensation.

Therefore, we find this argument unconvincing. Even despite this misrepresentation, our review of the audited yearly statements between end of year 2021 to 2024 submitted by GPI, indicates that the Pacific Institute maintains year-end cash flow and annual income levels sufficient to support GPI’s participation without undue hardship. Per their financial statements publicly

posted on their website, the Pacific Institute maintains an average year-end cash flow of over \$2.8 million and average annual revenues of over \$6.4 million.²⁶

5.3. Rebuttable Presumption

GPI also claims rebuttable presumption in this application to support its claim of significant financial hardship.²⁷ Pub. Util. Code Section 1804(b)(1) states that “[a] finding of significant financial hardship shall create a rebuttable presumption of eligibility for compensation in other commission proceedings commencing within one year of the date of that finding.”

GPI references a ruling issued in R.22-10-010, in which GPI was found eligible for intervenor compensation. That ruling directed GPI to file additional information to substantiate its claim of significant financial hardship. Although GPI filed a supplement in response to that ruling on June 22, 2023, GPI provided limited, self-reported numbers, and failed to submit any new or supporting financial information. Instead, GPI reiterated its position that they are “the renewable energy program of the Pacific Institute,” and not an independent entity. While the subsequent decision (D.24-08-054 issued in R.22-10-010) granted GPI intervenor compensation, we now have new facts and information before us in this application. Based on the record in this proceeding and the analysis above, we find that the Pacific Institute and GPI have not demonstrated

²⁶ Three year average (2022-2024) of Form 990 filings available at IRS Tax Exempt Organization Search (<https://apps.irs.gov/app/eos/>) and Pacific Institute website (<https://pacinst.org/financials/>).

²⁷ GPI NOI at 6.

significant financial hardship and therefore a rebuttable presumption claim does not apply here.

6. Substantial Contribution to Res. SPD-29, SPD-30, and SPD-31

Because we find that GPI and the Pacific Institute do not meet the requirements for intervenor compensation, we do not make a determination on their substantial contribution to Res. SPD-29, SPD-30, and SPD-31.

7. Conclusion

Although GPI filed this application timely, we find that GPI and the Pacific Institute do not meet the requirements for intervenor compensation pursuant to Pub. Util. Code Sections 1801–1812. Accordingly, because GPI and the Pacific Institute do not satisfy the criteria for intervenor compensation, we decline to make a finding regarding their substantial contribution to Res. SPD-29, SPD-30, and SPD-31.

These findings are specific to the instant application. GPI may submit new documentation in a future proceeding for Commission consideration should the circumstances addressed in this decision change. Nothing in this decision prevents GPI or the Pacific Institute from continuing to participate in Commission proceedings, at its own cost.

8. Summary of Public Comment

As of November 21, 2025, there are no public comments on the public comment portion of this proceeding’s docket card.

9. Procedural Matters

This decision affirms all rulings made by the Administrative Law Judge and assigned Commissioner in this proceeding. Pursuant to Rules 11.1 and 11.4,

this decision grants GPI's October 27, 2025 Motion for Confidential Treatment for attachments to a GPI Response (Attachments A, B, and C of the primary document, Green Power Institute Submission in Response to Section 2.16 of the September 16 Ruling of ALJ Tran). All other motions not ruled on in this matter are deemed denied.

10. Comments on Proposed Decision

The proposed decision of Administrative Law Judge (ALJ) Sasha Goldberg in this matter was mailed to the parties in accordance with Section 311 of the Pub. Util. Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. GPI filed comments on December 24, 2025. After review of the comments, no changes have been made to the outcome of the proposed decision.

Rule 14.3 of the Commission's rules of practice and procedure set forth the criteria for comments on a proposed or alternate decision. Rule 14.3(b) requires that comments include a subject index listing the recommended changes to the proposed or alternate decision, a table of authorities and an appendix setting forth changes to the proposed findings of fact and conclusions of law. Rule 14.3(c) requires that comments focus on factual, legal or technical errors in the proposed or alternate decision, and in citing such errors, the comments must make specific references to the record or applicable law. Comments which fail to do so would be given no weight.

On review, GPI's comments fail to meet the requirements of Rule 14.3(b) as they do not include a subject index, an appendix, or a table of authorities to support their recommended changes. Instead, their comments focus on "an

unfortunate clerical error” whereby GPI submitted outdated bylaws of the Pacific Institute to support its claim in the instant matter. The comments note that only upon review of the proposed decision that mailed did the seasoned intervenor become aware of this error.

Additionally, GPI’s comments fail to meet the requirements of Rule 14.3(c) as they do not focus on factual, legal or technical errors in the proposed decision, nor do they make any specific references to the record or applicable law to support such “errors.” Instead, GPI uses this opportunity to introduce new information and evidence to correct their own “errors,” rather than identify where in the record or applicable law the proposed decision makes factual, legal or technical errors. GPI attempts to introduce new information (updated bylaws and new donor information) via comments to a proposed decision when they had multiple opportunities to provide this evidence prior to the issuance of the proposed decision and the submission of the record. This is procedurally inappropriate.

Rule 13.15 provides the rules for submission and reopening of the record. Pursuant to Rule 13.15(a), a proceeding shall stand submitted for decision by the Commission after the taking of evidence, the filing of briefs, and the presentation of oral argument as may have been prescribed. Pursuant to Rule 13.15(b), a motion to set aside submission for the taking of additional evidence or argument shall specify the facts claimed to constitute grounds in justification thereof, including material changes of fact or of law alleged to have occurred since the conclusion of the hearing. It shall contain a brief statement of proposed additional evidence and explain why such evidence was not previously adduced.

As reflected in section 2 of this decision, this matter was submitted on September 24, 2025, upon GPI's filing of supplemental information to its application, and no motion has been filed to set aside submission or reopen the record.

Lastly, we reiterate that while GPI repeatedly references its receipt of intervenor compensation over the past 20 years, prior eligibility and past awards do not confer any entitlement to continued eligibility or compensation. Eligibility for intervenor compensation must be periodically reassessed, including an evaluation of customer status and significant financial hardship, as organizational and financial circumstances may change over time. Moreover, intervenor compensation is awarded only when an intervenor makes a substantial contribution to a Commission decision. The suggestion that intervenors previously found eligible should automatically continue to be found eligible and receive intervenor compensation or should be awarded compensation in full for mere participation, is presumptuous and unfounded. Intervenor compensation is funded by ratepayers, and like all ratepayer-funded resources, it must be administered with care, restraint, and fiscal responsibility. We reiterate that the finding of ineligibility to receive intervenor compensation does not prevent GPI from continuing to participate in Commission proceedings, at its own cost.

11. Assignment of Proceeding

Matthew Baker is the assigned Commissioner and Sasha Goldberg is the assigned ALJ in this proceeding.

Findings of Fact

1. Res. SPD-29, SPD-30, and SPD-31 were adopted by the Commission on January 16, 2025.
2. GPI timely filed A.25-02-022 seeking intervenor compensation for its contributions to Res. SPD-29, SPD-30, and SPD-31 on February 21, 2025.
3. GPI was directed to provide supplemental information to support its request that it qualifies for intervenor compensation pursuant to Pub. Util. Code Sections 1801-1812.
4. GPI filed its supplemental information to support its request that it qualifies for intervenor compensation on September 24, 2025.
5. Based on the information GPI filed, we find that GPI and the Pacific Institute are the same entity.
6. GPI and the Pacific Institute have not demonstrated customer status pursuant to Pub. Util. Code Section 1802(b)(1)(c).
7. GPI and the Pacific Institute have not made a showing of significant financial hardship pursuant to Pub. Util. Code Section 1802(h).
8. GPI may submit new documentation in a future proceeding for Commission consideration should the circumstances addressed in this decision change.

Conclusion of Law

GPI and the Pacific Institute fail to satisfy all requirements of Pub. Util. Code Sections 1801-1812 and are not eligible to claim intervenor compensation.

O R D E R

IT IS ORDERED that:

1. Green Power Institute's request for intervenor compensation in Application 25-02-022 is denied.
2. Application 25-02-022 is closed.

This order is effective today.

Dated _____, at Sacramento, California