

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue
Electric Integrated Resource Planning and
Related Procurement Processes.

Rulemaking 20-05-003
(Filed May 7, 2020)

**DECISION GRANTING COMPENSATION TO L. JAN REID FOR
SUBSTANTIAL CONTRIBUTION TO RULEMAKING (R.) 20-05-003
AND PROCUREMENT REVIEW GROUPS**

Intervenor: L. Jan Reid	For contribution to Rulemaking (R.) 20-05-003
Claimed: \$48,364.00	Awarded: \$48,786.03
Assigned Commissioner: Alice Reynolds	Assigned ALJs: Julie A. Fitch, Colin Rizzo ¹

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	N/A ²
B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Codes §§ 1801-1812³:	

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§1804(a)):		
1. Date of Prehearing Conference:	July 14, 2020	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	N/A	

¹ ALJ Rizzo was co-assigned to this proceeding on March 19, 2025.

² Reid contributed to R.20-05-003 which continues the Commission's process for integrated resource planning.

³ All statutory references are to California Public Utilities Code unless indicated otherwise.

	Intervenor	CPUC Verification
4. Was the NOI timely filed? Yes. An NOI was filed in R.16-02-007 on May 25, 2016.		Yes. <i>See</i> part I.C [3,4].
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:		
6. Date of ALJ ruling:		
7. Based on another CPUC determination (specify):	<i>See</i> D.23-03-029, Part I.B.11, slip op. at 2.	Verified. D.23-03-029 awarded compensation to L. Jan Reid in R.20-05-003. Rule 17.2 of the Commission's Rules of Practice and Procedure states that "A party found eligible for an award of compensation in one phase of a proceeding remains eligible in later phases, including any rehearing, in the same proceeding.". <i>See</i> Part I.C [11].
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:		
10. Date of ALJ ruling:		
11. Based on another CPUC determination (specify):	The Commission has found that "L. Jan Reid has demonstrated significant financial hardship as set forth in Part I (C)(1)." (D.18-09-043, slip op. at 19, Finding of Fact 1)	Verified; D.18-09-043 found Reid eligible to request intervenor compensation and awarded compensation to Reid in R.16-02-007. The Order Instituting Rulemaking (OIR) for R.20-05-003 stated that "Parties who were previously found eligible to request compensation in Rulemaking (R.) 16-02-007 shall remain eligible in this

	Intervenor	CPUC Verification
		proceeding and do not need to file a notice of intent within 30 days, provided there are no material changes in their bylaws or financial status.” <i>See Part I.C. [3,4].</i>
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	N/A. <i>See comment below.</i>	Not issued in conjunction with Decision.
14. Date of issuance of Final Order or Decision:	N/A. <i>See comment below.</i>	
15. File date of compensation request:	March 7, 2025	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Intervenor’s Comment(s)	CPUC Discussion
3,4	<p>The Order Instituting Rulemaking (OIR) for R.20-05-003 ordered that “Parties who were previously found eligible to request compensation in Rulemaking (R.) 16-02-007 shall remain eligible in this proceeding and do not need to file a notice of intent within 30 days, provided there are no material changes in their bylaws or financial status.” (OIR, Ordering Paragraph 9, slip op. at 22)</p> <p>There was no material change to Reid’s by-laws or financial status. The Commission found that Reid was eligible to request intervenor compensation in R.16-02-007. As a result the Commission awarded Reid \$31,569.00 for contributions to D.20-03-028 in R.16-02-007. (See D.21-03-028)</p>	<p>Verified.</p> <p>D.21-03-038 found Reid eligible to request intervenor compensation and awarded compensation to Reid in R.16-02-007 for contributions to D.20-03-028.</p>
11	Rule 17.2 of the Commission’s Rules of Practice and Procedure states that “A party found eligible for an award of compensation in one phase of a proceeding remains eligible in later phases, including any rehearing, in the same proceeding.”	Verified

#	Intervenor's Comment(s)	CPUC Discussion
	Since Reid was found eligible for an award of compensation in D.23-03-029, he is eligible for an award of compensation throughout R.20-05-003.	
13,14	A final decision closing Rulemaking (R.) 20-05-003 has not been issued. Therefore, the request is timely pursuant to PUC §1804(c).	Verified
16	<p>This request is timely under PUC §1804(c) because of a standard previously established in D.11-03-019. In its decision on a compensation request filed by Reid, the Commission stated that: (D.11-03-019, slip op. at 6) “Reid filed his request for compensation on September 16, 2010.</p> <p>Considering that PRG and cost allocation mechanism group (CAMG) activities are ongoing and we have not established time-lines for requesting intervenor compensation for this work, we find this request timely.” The Commission should apply the same standard to the instant request by finding that Reid’s request is timely under PUC §1804(c).</p>	Noted

PART II: SUBSTANTIAL CONTRIBUTION

A. Did the Intervenor substantially contribute to the final decision (see §§ 1802(j), 803(a), 1803.1(a) and D.98-04-059):

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
1. Procurement Review Group (PRG) and Cost Allocation Mechanism Group (CAMG)	<p>Reid claims compensation for his participation in Pacific Gas and Electric Company’s (PG&E’s) Procurement Review Group (PRG) and PG&E’s Cost Allocation Mechanism Group (CAMG) for the period June 9, 2020, to January 22, 2025.</p> <p>Reid made a substantial contribution to the PRG and CAM process during the period reflected in the request through unique analysis, perspective, or work product, and through specific expertise or skills.</p> <p>The Commission has previously stated that: (D.11-03-019, slip op. at 7) “D.07-11-024 clarifies what information intervenors need to provide when they request compensation for participation in PRGs.” I address the requirements of D.07-11-024 in Attachment B of the instant pleading.</p>	Verified

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	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: The Utility Reform Network (TURN), Coalition of Utility Employees (CUE), Earth Justice, and Pacific Gas and Electric Company (PG&E).		Noted
d. Intervenor's claim of non-duplication: Reid collaborated with a number of PRG members during the period June 9, 2020, to January 22, 2025. Reid had private meetings or teleconferences with the following individuals: Rachel Koss of CUE, Matt Freedman of TURN, Independent Evaluators Lewis Hashimoto, Wayne Oliver, and Allan Taylor; and Bukowski and Patel of PG&E. Reid also collaborated with a number of parties at PRG and CAMG meetings. Although Reid does not seek compensation for all of these communications, they indicate reasonable collaboration with other parties.		Noted

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

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: My participation in PG&E's PRG allowed me to identify issues in advance of an application, and to focus on disputed cases that I believed were the highest priority for ratepayers. Ratepayers benefited because I was able to resolve many issues in the PRG process, thereby reducing the amount of protracted and expensive litigation. San Diego Gas & Electric Company (SDG&E) has pointed out: (R.06-02-013, Reply Comments of San Diego Gas & Electric Company On Proposed Decision Regarding Intervenor Compensation Related to Procurement Review Groups, Peer Review Groups and Public Advisory Groups, June 25, 2007, p. 2.) “Although the PRGs and PAGs are advisory in nature, they have greatly minimized potential litigation and contention in advance of filings being made because of the opportunity to confer at an early stage and on an ongoing basis.” PG&E has withdrawn or modified numerous proposals as a result of Reid's participation in the PRG process, thereby saving ratepayers millions of dollars. At a public workshop on June 11, 2007, Sandra	Noted

CPUC Discussion
<p>Burns of PG&E pointed out that PG&E considered certain transactions, but decided against executing them after consultation with its PRG. PG&E has recently stated that “More specifically, the PRG membership has provided valuable feedback on a variety of subjects, including but not limited to, renewable energy, greenhouse gas, resource adequacy, congestion revenue rights, and emerging technology policy and contracting considerations.</p> <p>PG&E finds the advice and opinions expressed by the PRG members thoughtful and insightful. PG&E always considers the advice of the PRG members prior to making any final procurement policy or contracting decisions. In the past, PG&E had modified or withdrawn certain procurement recommendations as the result of that advice.” (PG&E Response to Reid Discovery Request #1, August 26, 2014, p. 1⁴)</p> <p>Discovery in the PRG setting is more efficient than discovery conducted in a formal proceeding. In the PRG process, PG&E often provides requested data within 48 hours. There has been no instance where PG&E has refused to furnish information to Reid in a PRG setting. In a formal application, this is not always the case. Utilities may take up to two weeks to respond to discovery requests and can object, refuse to answer, or provide incomplete answers to discovery questions. Because discovery in the PRG process is more efficient than discovery in a formal proceeding, Reid was able to reduce ratepayer costs when he participated in a subsequent formal proceeding.</p> <p>In 2002, the Commission found that: (D.02-10-062, Finding of Fact 28, slip op. at 72) “Participation in the procurement review group makes a significant contribution to effective implementation of this decision and parties eligible to receive intervenor compensation awards in this proceeding should be eligible to seek compensation for their work in these groups and in the on-going review of procurement advice letters and expedited applications.”</p> <p>My contract analysis in the PRG process allowed me to determine whether I would formally protest subsequent application and advice letter filings. During the period covered by this pleading, I reviewed numerous advice letters. Based upon my review and analysis, I decided not to protest these PG&E advice letters. Thus, Reid’s PRG participation saved ratepayers the cost of Reid’s participation in the procedural process for these advice letters.</p> <p>The Commission can safely find that the participation of Reid in this</p>

⁴ Pacific Gas and Electric Company’s data response in R.13-12-010 was filed on June 5, 2020. This data response was sent on August 26, 2014.

		CPUC Discussion
proceeding was productive. Overall, the benefits of Reid's contributions to the PRG and CAM processes justify compensation in the amount requested. Reid contributed to the proceeding in a manner that was productive and that will result in benefits to ratepayers that exceed the cost of Reid's participation.		
b. Reasonableness of hours claimed:		<i>See Part III.D CPUC Comments, Disallowances, and Adjustments [2].</i>
c. Allocation of hours by issue: Due to the confidential nature of the PRG and CAMG, the Commission does not require intervenors to allocate hours by issue. The Commission has previously stated: “Compensation requests need not publicly disclose confidential information.” (D.07-11-024, slip op. at 6) “The intervenor must determine what information it can or will provide to support its request.” (D.07-11-024, slip op. at 7-8)		Noted

B. Specific Claim: *

CLAIMED					CPUC AWARD			
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
L. Jan Reid	2020	35.4	\$245.00	D.23-03-029, slip op. at 13, Item 2.	\$8,673.00	35.40	\$245.00 [1]	\$8,673.00
L. Jan Reid	2021	25.5	\$295.00	D.23-03-029, slip op. at 13, Item 2.	\$7,522.50	25.50	\$295.00 [1]	\$7,522.50
L. Jan Reid	2022	26.1	\$305.00	D.24-04-033, slip op. at 11, Hourly Fee Information.	\$7,960.50	26.10	\$305.00	\$7,960.50
L. Jan Reid	2023	40.2	\$320.00	D.24-04-033, slip op. at 11, Hourly Fee Information.	\$12,864.00	40.20	\$320.00	\$12,864.00
L. Jan Reid	2024	29.0	\$320.00	D.24-04-033, slip op. at 11,	\$9,280.00	29.00	\$335.00 [1]	\$9,715.00

CLAIMED					CPUC AWARD			
				Hourly Fee Information.				
L. Jan Reid	2025	1.4	\$320.00	D.24-04-033, slip op. at 11, Hourly Fee Information.	\$448.00	1.40	\$345.00 [1]	\$483.00
<i>Subtotal: \$46,748.00</i>					<i>Subtotal: \$47,218.00</i>			
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
L. Jan Reid	2025	10.1	\$160.00	D.24-04-033, slip op. at 11, Hourly Fee Information.	\$1,616.00	9.09 [2]	\$172.50 [1]	\$1,568.03
<i>Subtotal: \$1,616.00</i>					<i>Subtotal: \$1,568.03</i>			
<i>TOTAL REQUEST: \$48,364.00</i>					<i>TOTAL AWARD: \$48,786.03</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

ATTORNEY INFORMATION				
Attorney	Date Admitted to CA BAR ⁵	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation	
N/A				

⁵ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

C. Attachments Documenting Specific Claim and Comments on Part III:⁶

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Attachment A: Detailed List of Professional Hours Claimed
3	Attachment B: L. Jan Reid's Response To The Requirements of Decision 07-11-024

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Reid's 2020, 2021, 2024, & 2025 Hourly Rates	D.22-02-023 approved a 2020 hourly rate of \$245.00 for Reid. D.22-02-023 approved a 2021 hourly rate of \$295.00 for Reid. D.24-04-033 approved a 2023 hourly rate of \$320.00 for Reid. We apply the 2024 escalation factor of 4.07% to the 2023 rate, resulting in a 2024 rate of \$335.00 for Reid. We apply the 2025 escalation factor of 3.46% to the 2024 rate, resulting in a 2025 rate of \$345.00 for Reid.
[2] Reid's 2025 Intervenor Compensation Preparation Disallowance	<u>Failure to Comply With IComp Program Guidelines (1.01 hours):</u> Reid did not complete Part III.A.b. of the intervenor compensation claim. The Commission asks that all sections of the claim be completed with detailed explanation. As required by the Intervenor Compensation Program Guide at page 21, "You must explain why the claimed hours for the work performed are reasonable (the efficiency aspect)." We therefore disallow 10% of Reid's 2025 hours dedicated to intervenor compensation preparation. The Commission encourages Reid to provide thorough and complete claims in the future to avoid greater disallowances.

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 (see Rule 14.6(c)(6))?	Yes

⁶ Attachments not included in final Decision.

FINDINGS OF FACT

- 1.L. Jan Reid has made a substantial contribution to R.20-05-003.
- 2.The requested hourly rates for L. Jan Reid, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
- 3.The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
- 4.The total of reasonable compensation is \$48,786.03.

CONCLUSION OF LAW

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

ORDER

1. L. Jan Reid is awarded \$48,786.03.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company shall pay L. Jan Reid 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 May 21, 2025, the 75th day after the filing of L. Jan Reid's request, and continuing until full payment is made. The comment period for today's decision is waived.

This decision is effective today.

Dated _____, 2026, at Sacramento, California.

APPENDIX
Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	R2005003 Procurement Review Groups		
Proceeding(s):	R2005003		
Author:	ALJ Fitch & ALJ Rizzo		
Payer(s):	Pacific Gas and Electric Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
L. Jan Reid	March 7, 2025	\$48,364.00	\$48,786.03	N/A	<i>See Part III.D CPUC Comments, Disallowances, and Adjustments above.</i>

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
L. Jan	Reid	Expert/Advocate ⁷	\$245.00	2020	\$245.00
L. Jan	Reid	Expert/Advocate ⁷	\$295.00	2021	\$295.00
L. Jan	Reid	Expert/Advocate ⁷	\$305.00	2022	\$305.00
L. Jan	Reid	Expert/Advocate ⁷	\$320.00	2023	\$320.00
L. Jan	Reid	Expert/Advocate ⁷	\$320.00	2024	\$335.00
L. Jan	Reid	Expert/Advocate ⁷	\$320.00	2025	\$345.00

(END OF APPENDIX)

⁷ Reid is classified as an Economist V.