

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

December 19, 2025

**Agenda ID #23933**  
**Ratesetting**

**TO PARTIES OF RECORD IN APPLICATION 24-03-018:**

~~This is the proposed decision of Administrative Law Judge Nilgun Atamturk. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's February 5, 2026 Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.~~

~~Parties to the proceeding may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure. Electronic copies of comments should also be sent to the Intervenor Compensation Program at [icompcordinator@cpuc.ca.gov](mailto:icompcordinator@cpuc.ca.gov).~~

/s/ MICHELLE COOKE

Michelle Cooke

Chief Administrative Law Judge

MLC:nd3

Attachment

Decision **PROPOSED DECISION OF ALJ ATAMTURK (Mailed 12/19/2025)**

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

Application of Pacific Gas and Electric Company to Recover in Customer Rates the Costs to Support Extended Operation of Diablo Canyon Power Plant from September 1, 2023 through December 31, 2025 and for Approval of Planned Expenditure of 2025 Volumetric Performance Fees (U39E).

Application 24-03-018

**DECISION GRANTING COMPENSATION TO  
ALLIANCE FOR NUCLEAR RESPONSIBILITY  
FOR SUBSTANTIAL CONTRIBUTION TO DECISION 24-12-033**

<b>Intervenor:</b> Alliance for Nuclear Responsibility	<b>For contribution to Decision (D.) 24-12-033</b>
<b>Claimed:</b> \$381,664.52	<b>Awarded:</b> \$84,091.50
<b>Assigned Commissioner:</b> Karen Douglas	<b>Assigned ALJ:</b> Nilgun Atamturk

**PART I: PROCEDURAL ISSUES**

<b>A. Brief description of Decision:</b>	D.24-12-033 approved, after certain reductions and other modifications, PG&E's application for the 2023 – 2025 revenue requirement for Diablo Canyon's extended operation and PG&E's planned expenditure of 2025 Volumetric Performance Fees.
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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:	May 31, 2024	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	June 26, 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:	June 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:	June 14, 2023	July 3, 2025
11. Based on another CPUC determination (specify):		D.25-06-062
12. Has the Intervenor demonstrated significant financial hardship?		Yes
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.24-12-033	Verified
14. Date of issuance of Final Order or Decision:	December 20, 2024	Verified
15. File date of compensation request:	February 14, 2025	Verified
16. Was the request for compensation timely?		Yes

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

### C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
1	The boxes for Section B of A4NR's June 26, 2024 NOI appear to have been left blank. For Question B.1., the answer is "Yes." For Question B.2., the answer is "No."	Noted

### 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
1. A4NR challenged PG&E's failure to comply with D.22-12-005's direction to use government funding for certain transition costs "to the greatest extent possible" or explain why it had not done so. (Protest, pp. 5 – 6; Opening Brief, pp. 10 – 12, 20; Reply Brief, p. 5; Opening Comments on PD, pp. 4 – 5, 11).	D.24-12-033 (at pp. 15 – 16) acknowledges A4NR's position and, citing the D.22-12-005 language states (at p. 18 and in Finding of Fact 8) that "PG&E failed to provide in its application a detailed explanation why PG&E did not seek government funding, or was otherwise unable to anticipate the need for the investments and activities at the time government funding was being requested." D.24-12-033 directs PG&E (at pp. 23, 70), in its next application, to "provide a detailed account of why it did not seek government funding for the costs being requested to be recovered from ratepayers, or was otherwise unable to anticipate the need for the investments and activities at the time government funding was being requested."	Noted, however, the Commission acknowledged that A4NR was one of several parties to argue that PG&E's operations and maintenance (O&M) cost components "should not be recovered from ratepayers and should instead be covered by government funding." <sup>2</sup> The Commission then highlighted A4NR's position that PG&E should have sought government funding for the O&M Project Expense because it was in preparation for extended operations. <sup>3</sup> The Commission disagreed with A4NR and found "that A4NR's

<sup>2</sup> D.24-12-033 at 15.

<sup>3</sup> *Id.* at 15-16.

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
		interpretation of 'preparation' is overly broad resulting in precluding almost all costs as preparatory," <sup>4</sup> and "that PG&E's forecasted O&M costs comply with the applicable statute and Commission orders, are reasonable, and should be approved." <sup>5</sup>
2. A4NR objected to PG&E's VPF spending plan for featuring projects that duplicate what a public utility is already required to fund under Section 451, and specifically criticized PG&E's initial inclusion of five gas-related projects in its VPF spending plan as inconsistent with the "public purpose priorities" requirement of the statute (Protest, pp. 6 – 7).	Revising its proposal in response to intervenor objections, PG&E removed any expenditures from its VPF spending plan "that strictly benefit the gas line of business" (PG&E Rebuttal Testimony, p. 8-14, line 8), thereby removing the need for the Commission to address this issue. D.24-12-033 requires (in Ordering Paragraphs 5 and 6) PG&E to file a Tier 1 Advice Letter, a CFO attestation, and a third-party independent audit to ensure that VPF expenditures are incremental to existing authorizations, do not represent double recovery, and comply with Section 712.8(s).	PG&E's Rebuttal Testimony states that it removed expenditures "that strictly benefit the gas line of business" in response to California Community Choice Association's (CalCCA) recommendation and does not mention A4NR. <sup>6</sup> Also, nowhere in A4NR's Protest does it recommend the Commission subject PG&E to additional oversight regarding Volumetric Performance Fees (VPF) expenditures. Accordingly, we find that A4NR made minimal impact to the decision-making process on this claimed

<sup>4</sup> *Id.* at 17.<sup>5</sup> *Id.* at 23.<sup>6</sup> PG&E's Rebuttal Testimony at 8-14, lines 3-13 and 8-17, lines 5-6 ("with the removal of gas programs as discussed in response to CalCCA above").

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
		contribution.
3. A4NR objected to PG&E's proposed use of a Tier 3 Advice Letter, rather than a formal Application, for review of future VPF spending plans because "PG&E's oscillating process for planning VPF expenditures lacks sufficient maturity to inspire confidence" (Opening Brief, pp. 28 – 29; Reply Brief, pp. 19 – 20).	D.24-12-033 (at p. 68) acknowledges A4NR's position and denies PG&E's request without prejudice, noting that "The VPF program is a new program. Until we gain a reasonable amount of experience with the program, it is appropriate to consider the program annually through an application process."	Verified
4. Noting the absence of a required specific authorization in SB 846, A4NR contested PG&E's request for a federal and state income tax gross-up of its fixed management fees and explained that PG&E's "in lieu of a rate-based return on investment" argument was misplaced because PG&E's shareholders are making no capital investment (Reply Brief, pp. 12 – 13).	D.24-12-033 (at p. 40) acknowledges A4NR's opposition to PG&E's request and states (at p. 43) that PG&E "is not authorized to recover any tax gross-up on the fixed management fee." D.24-12-033 reasons (at p. 42) that "the management fee is not the same as an authorized return on rate base. The Commission has no reason to think the management fee is akin to an income generating investment in capital expenditures."	The Commission acknowledges that A4NR made the same argument as Energy Producers and Users Coalition (EPUC), Small Business Utility Advocates (SBUA,) and The Utility Reform Network (TURN) in opposition to "authorizing PG&E to include federal and state income taxes and the related tax gross up." <sup>7</sup> The Commission does not mention A4NR again regarding this issue and mostly relies on TURN's comments that "PG&E is not authorized to recover any tax gross-up on the

<sup>7</sup> D.24-12-033 at 40.

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
		fixed management fee.” <sup>8</sup> A4NR also acknowledges its agreement with TURN in their reply brief on this issue. <sup>9</sup> We find that A4NR did not provide a unique perspective on this issue.
5. A4NR objected to PG&E's dysfunctional proposed schedule for the proceeding, refusing to waive its right to the time prescribed by Rule 14.3 for Opening and Reply Comments on a Proposed Decision (Protest, pp. 7 – 8) and later exercising its right under Rule 13.14 to request oral argument in a ratemaking proceeding (A4NR Motion for Oral Argument).	The Assigned Commissioner's Scoping Memo and Ruling (at p. 5) adopted a schedule that specified a Commission decision “no sooner than 30 days after PD” and the Commission allowed parties to make oral arguments before it adopted D.24-12-033.	Verified
6. A4NR opposed PG&E's proposed modification of D.23-12-036's method for allocating Diablo Canyon's RA and GHG attributes to jurisdictional	D.24-12-033 acknowledges A4NR's position, noting (at p. 52) that “A4NR criticizes PG&E for not seeking changes in the allocation of RA and GHG attributes by filing a Petition for Modification” and determining (at p. 54) that “PG&E's proposal does not comply with implementation of the RA allocation methodology adopted in D.23-12-036, and therefore, it is	Noted, however D.24-12-033 does not require PG&E to file a Petition for Modification if it wants to modify its greenhouse gas (GHG) and Resource Adequacy (RA) attributes. A4NR was also one of several parties objecting to

<sup>8</sup> *Id.* at 43.

<sup>9</sup> *Id.* at 12.

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
LSEs (Testimony, p. 17, line 10 – p. 18, line 16; Opening Brief, pp. 25 – 26; Reply Brief, pp. 15 – 16).	rejected.”	PG&E's proposal. <sup>10</sup>
7. A4NR identified issues concerning the DWR loan to PG&E that have the potential to increase costs to ratepayers (Testimony, p. 26, line 3 – p. 27, line 21; Opening Brief, pp. 6, 30, 37 – 38; Opening Comments on PD, pp. 14 – 15), alerting the Commission to a need for greater oversight.	D.24-12-033 (at p. 71) acknowledges that “PG&E’s testimony provides little information about this source of funding,” but declined to adopt a TURN proposal for increased scrutiny, observing (at p. 72 and Finding of Fact 26) that “There is already a public agency review process established and DWR and the Commission have the authority and capability of review of these expenses.”	D.24-12-033 does not acknowledge A4NR’s position on this issue and states that this proceeding is not the proper forum to review the California Department of Water Resources (DWR) loan’s cost to ratepayers. We therefore find that A4NR’s comments on this issue did not substantially contribute to the decision-making process.
8. A4NR observed that PG&E’s cost forecast omitted more than \$295 million in Diablo Canyon 2025 – 2026 Administrative and General (“A&G”) costs absorbed by PG&E ratepayers via the 2023 General Rate Case (Opening Brief, p. 6).	D.24-12-033 (at p. 69) notes “the missing A&G costs” and observes that “PG&E has no excuse for not accounting for A&G for 2025 and beyond in this application,” concluding that “PG&E must include the A&G costs in its next DCPP cost forecast application” (See also, p. 70, Finding of Fact 25, Conclusion of Law 24).	D.24-12-033 acknowledges TURN’s and Californians for Renewable Energy, Inc.’s (CARE) positions on this issue, but not A4NR’s. Additionally, A4NR’s claimed contribution on this issue cites the same section of TURN’s work as the Commission does in D.24-12-033. At 6, fn 27 (“TURN-01, p. 21, line 9 – p. 23, line 4”). We therefore find that A4NR did not

<sup>10</sup> D.24-12-033 at 52.

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
		substantially contribute to this issue as they were only reciting TURN's position and did not materially supplement, complement, or contribute to the presentation of another party. <i>See</i> § 1802.5.
9. A4NR joined other intervenors in voicing concern about PG&E's excessive use of confidentiality designations in its Application and supporting testimony (PHC transcript, p. 37, lines 18 – 20).	D.24-12-033 (at p. 71) notes, "PG&E states that it will strive to minimize the amount of confidential information in the next annual application, while still protecting any market-sensitive data," and directs that "PG&E must minimize the amount of confidential information in the next annual application and protect only market-sensitive data, as permitted by the Commission decisions" ( <i>See also</i> Conclusion of Law 25).	A4NR's claimed contribution on this issue is Mr. Geesman stating in the Pre-Hearing Conference that "I want to echo the concerns about confidentiality. I won't elaborate beyond that because they're self evident." We find that A4NR did not substantially contribute to the decision-making process on this issue because they were only agreeing with the position of other parties and did not materially supplement, complement, or contribute to the presentation of another party. <i>See</i> § 1802.5.
10. A4NR urged a significant enhancement, along the lines recommended in CalCCA's Opening Brief, of the information PG&E is required to provide in its annual true-up Tier 3 Advice Letter (Reply)	D.24-12-033 (at pp. 73 – 74) agrees, directing PG&E "to provide the same type of information and analysis" in its true-up filing that it does for ERRA compliance reviews, and specifying what will be expected.	A4NR's claimed contribution on this issue is a three-paragraph quote of CalCCA's position. A4NR does not provide any additional analysis that "materially supplements, complements, or

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
Brief, pp. 14 – 15).		contributes to the presentation of' CalCCA. § 1802.5. We therefore find that A4NR did not substantially contribute to the decision-making process on this issue.

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

	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>b. Were there other parties to the proceeding with positions similar to yours?</b>	Yes	Verified
<b>c. If so, provide name of other parties:</b> TURN, SLOMFP, CARE.		Noted
<b>d. Intervenor's claim of non-duplication:</b> Although portions of A4NR's cost concerns were shared by several other intervenors, A4NR consciously avoided duplication by not seeking to replicate TURN's development of an alternative VPF spending plan or SLOMFP's emphasis on omitted costs associated with seismic upgrades or reactor vessel embrittlement. A4NR instead framed its critique of PG&E's cost forecast as (1) impermissible variances from statutory limits established in SB 846 or (2) Commission direction established in D.23-12-035 and D.22-12-005. This framing enabled A4NR a breadth and depth of coverage of cost-related issues that complemented – rather than redundantly repeated – the evidentiary showings and arguments presented by other intervenors. A4NR also avoided duplication by close scrutiny of, and (for certain issues) reliance on, discovery conducted by other parties.		Noted

### PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
<b>a. Intervenor's claim of cost reasonableness:</b> A4NR's	Noted

	CPUC Discussion
<p>intervention produced tangible benefits to ratepayers by (1) preventing a federal and state income tax gross-up worth an annual \$33.63 million (as identified in D.24-12-033 at p. 41); (2) removing the unquantified costs of five gas-related projects from the VPF spending plan otherwise funded by the 2023 GRC; (3) blocking PG&amp;E's attempted post-D.23-12-036 reallocation to its own service area of some 3.6% of the RA and GHG attributes (valued at an annual average of some \$34.4 million over the extended operations period, based upon page 2-22, line 2 of PG&amp;E's Testimony and Table 2-3, lines 19 and 21, of PG&amp;E's Fall Update); (4) and requiring proper accounting for some \$295 million in 2025-2026 A&amp;G costs (as identified in A4NR's Opening Brief at p. 6) from PG&amp;E's forecast. These amounts are each many multiples of the cost of A4NR's participation in A.24-03-018 and – without attaching a monetary value to the several forward-looking procedural safeguards achieved by A4NR's intervention – reinforce the cost reasonableness of the effort.</p>	
<p><b>b. Reasonableness of hours claimed:</b> With the exception of tax normalization, A4NR litigated every issue identified in the Assigned Commissioner's Scoping Memo and Ruling. A4NR conducted six rounds of discovery, sponsored comprehensive testimony on these issues, submitted Opening and Reply Briefs, Opening and Reply Comments on PG&amp;E's Fall Update, Opening and Reply Comments on the PD, as well as oral argument. This required reasonable research and preparation, as contemplated by Pub. Util. Code Sections 1802(a) and 1803, to meet the standards of professionalism and accuracy expected by the Commission for both evidence and argument, including analyses of the cost-effectiveness of Diablo Canyon's contribution to system reliability and GHG emission reductions during extended operations. The tangible financial benefits to ratepayers attributable to A4NR's intervention confirm the reasonableness of the hours expended.</p>	Noted
<p><b>c. Allocation of hours by issue:</b> (1) PG&amp;E forecast revenue requirement, 211.828 hours, 36.01 %; (2) PG&amp;E proposed reallocation of RA and GHG attributes, 50.1105 hours, 8.52 %; (3) PG&amp;E proposed VPF spending plan, 58.8125 hours, 9.99 %; (4) compliance with D.23-12-036 and D.22-12-005, 207.199 hours, 35.23 %; and (5) general (including travel and claim preparation), 60.25 hours, 10.24 %. Percentages sum to 99.99 % due to rounding.</p>	Noted. However, the spreadsheet submitted by A4NR shows that the numbers here were rounded by their software. After moving the decimal point to the 10,000 <sup>th</sup> place for all

	CPUC Discussion
	<p>timesheet entries, we came to the following totals for the issues:</p> <ul style="list-style-type: none"> <li>(1) 211.8255 hours</li> <li>(2) 50.113 hours</li> <li>(3) 58.815 hours</li> <li>(4) 207.2015 hours</li> <li>(5) 60.25 hours</li> </ul> <p>This results in three separate total hours being requested by A4NR. Here the total is 588.200 hours, the total from the spreadsheet is 588.205 hours, and the total in Part III.B is 588.210 hours.</p> <p>We find that the difference between the total hours in A4NR's spreadsheet and Part III.B are due to a rounding difference in a timesheet entry for Weisman on 12/12/24 with the task description "ex parte w. Atty., A. Reynolds' and Douglas' staffs." When the spreadsheet is expanded to the 10,000<sup>th</sup> decimal point for this entry, Issue 1 shows a total of 0.1250 hours, instead of the 0.1300 hours in the PDF submitted as Attachment 3. This resulted in a difference of 0.0050 hours when adding up all the issues. Ultimately, we find that A4NR's request for 588.2100 hours to be the correct total.</p> <p>We also find that the appropriate allocation of</p>

		CPUC Discussion
		hours by issue for the purpose of calculating reductions in Part III.D is the totals found in A4NR's timesheet with the numbers in each cell expanded to the furthest decimal point such that rounding is not necessary.

**B. Specific Claim:\***

CLAIMED					CPUC AWARD							
ATTORNEY, EXPERT, AND ADVOCATE FEES												
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$				
John Geesman	2024	433.6	780	D.24-04-039 plus ALJ-339 escalation for 2024. See Comment below.	338,208.00	94.99 [3, 4]	\$770.00 [1]	\$73,142.30				
David Weisman	2024	106.32	230	D.24-04-039 plus ALJ-339 escalation for 2024.	24,453.60	22.82 [3, 4]	\$240.00 [2]	\$5,476.80				
<i>Subtotal: \$362,661.60</i>					<i>Subtotal: \$78,619.10</i>							
OTHER FEES												
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):												
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$				
John Geesman	2024	32.55	390	D.24-04-039 plus ALJ-339 escalation for 2024. See Comment below.	12,694.50	0.00 [3]	N/A [3]	\$0.00				
<i>Subtotal: \$12,694.50</i>					<i>Subtotal: \$0.00</i>							
INTERVENOR COMPENSATION CLAIM PREPARATION **												

CLAIMED						CPUC AWARD					
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$			
John Geesman	2024	0.74	\$390.00	D.24-04-039 plus ALJ-339 escalation for 2024. See Comment below.	\$288.60	0.74	\$385.00 [1]	\$284.90			
John Geesman	2025	12.5	\$390.00	D.24-04-039 plus ALJ-339 escalation for 2024, prior to application of any 2025 escalation. See Comment below.	\$4,875.00	12.50	\$390.00 [1]	\$4,875.00			
David Weisman	2025	2.5	\$115.00	D.24-04-039 plus ALJ-339 escalation for 2024, prior to application of any 2025 escalation.	\$287.50	2.50	\$125.00 [2]	\$312.50			
<i>Subtotal: \$5,451.10</i>						<i>Subtotal: \$5,472.40</i>					
COSTS											
#	Item	Detail			Amount	Amount					
1.	Hotel receipt	Geesman lodging for July 19, 2024 DCNPP tour			\$250.50	\$0.00 [3]					
2.	Hotel receipt	Geesman lodging for June 20-21, 2024 DCISC meeting			\$349.18	\$0.00 [3]					
3	Hotel receipt	Geesman lodging for Feb 21-22, 2024 DCISC meeting			\$257.64	\$0.00 [3]					
<i>Subtotal: \$857.32</i>						<i>Subtotal: \$0.00</i>					
<b><i>TOTAL REQUEST: \$381,664.52</i></b>						<b><i>TOTAL AWARD: \$84,091.50</i></b>					
<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</p>											

CLAIMED	CPUC AWARD		
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 <sup>11</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>12</sup>

Attachment or Comment #	Description/Comment
COMMENT	Please note A4NR's November 1, 2024 COMMENTS ON PROPOSED DECISION GRANTING COMPENSATION FOR SUBSTANTIAL CONTRIBUTION TO D.23-12-036 (filed in 2/14/202) for correct calculation of John Geesman's 2024 rate.
1	Certificate of Service
2	Time Records of John Geesman
3	Time Records of David Weisman
4	Hotel lodging receipts
5	Spreadsheet Verification of Calculations

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

Item	Reason
[1] Geesman's	Upon further review, the Commission has determined that 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

<sup>11</sup> This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

<sup>12</sup> Attachments are not included in final Decision.

Item	Reason
2024 and 2025 Hourly Rates and Intervenor Compensation (IComp) Preparation Rate	<p>the floor for a given experience level.<sup>13</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>A4NR has confirmed that per the terms of their contract, Geesman has been hired on a contingency rate basis, meaning that Geesman has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on Geesman's experience as a Legal – Attorney – Level V.</p> <p>Given that the 2024 rate range for Legal – Attorney – Level V is \$560.95 to \$773.67, we find the requested 2024 hourly rate of \$780.00 to be excessive. Based on Geesman's experience, we determine that an hourly rate of \$770.00 is more reasonable, and approve it here. We apply one-half of Geesman's approved 2024 hourly rate of \$770.00 for an Intervenor Compensation Claim Preparation rate of \$385.00.</p> <p>Given that the 2025 rate range for Legal – Attorney – Level V is \$585.41 to \$797.23, we find the requested 2025 hourly rate of \$780 to be reasonable, and approve it here. We apply one-half of Geesman's approved 2025 hourly rate for an Intervenor Compensation Claim Preparation rate of \$390.</p> <p>The award determined herein for Geesman's contribution in this proceeding shall be paid in full to Geesman, and no portion of this part of the award shall be kept by A4NR. 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>We reiterate that it is the responsibility of the intervenor to be forthcoming about engaging consultants and the terms of the contract, to adhere to the Commission's policy on compensation for consultant fees, and to provide the appropriate documentation with the initial claim to ensure efficient processing, and thus avoid the need for the Commission to request supplemental documentation. In this instance,</p>

<sup>13</sup> D.07-01-009, D.08-04-010, and ALJ Resolution ALJ 235.

Item	Reason
	A4NR did not provide all the documentation pertaining to the contract terms between Intervenor and Consultant in the initial claim and waited until the Commission requested supplemental documentation which delays the processing of the claim.
[2] Weisman's 2024 and 2025 Hourly Rates and 2025 Intervenor Compensation Preparation Rate	<p>D.25-05-017 approved a 2024 hourly rate of \$240.00 for Weisman as an Expert – Communication Specialist – Level III.</p> <p>We reviewed Weisman's experience and starting in 2025 we find that Weisman has enough experience to qualify as a Level IV (10-15 years of experience) as a Communications Specialist. The 2025 rate range for an Expert – Communication Specialist – Level IV is \$246.63 to \$368.67. We find a 2025 hourly rate of \$250.00 reasonable.</p> <p>We approve a 2025 intervenor compensation preparation rate of \$125.00 for Weisman, which is one-half of Weisman's 2025 hourly rate of \$250.00</p>
[3] Limited Contributions to the Decision-Making Process	<p>Public Utilities Code § 1802(j) states that a substantial contribution “has substantially assisted the commission in the making of its order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer.” In our determination that A4NR made a contribution, we also evaluate whether the hours claimed were commensurate with the contributions made. Making a substantial contribution in and of itself does not entitle an intervenor to all its claimed fees and costs. Compensation is granted for efficient, meaningful contributions. Because A4NR’s efforts were excessive and were not sufficiently contributory, we make the following reductions: 140.35 hours in Attorney, Expert, and Advocation Fees, 32.55 hours of driving time, and \$857.32 in lodging from A4NR. These reductions appropriately acknowledge the value of A4NR’s contributions as further explained below.</p> <p><u>Resolution E-5299 (9.94 hours reduced)</u></p> <p>Between 4/10/24 and 4/13/24, A4NR claimed four timesheet entries for 9.94 hours of Geesman’s time with the description of: “draft response to Draft Res. E-5299 on DCTRMA and DCEOBA accounting for extended operations.” However, A4NR does not claim substantial contribution towards Resolution E-5299 in this request for intervenor compensation. We therefore reduce these hours without prejudice. A4NR may file a request for compensation for their work</p>

Item	Reason
	<p>towards Resolution E-5299 if they are still eligible to do so.</p> <p><u>Tour of Diablo Canyon and attendance at NRC, IPRP, and DCISC Meetings (134.83 hours and \$857.32 in lodging reduced)</u>  A4NR claimed substantial contributions to the decision-making process for 134.83 hours of attending, and sometimes preparing for and participating in, the following events:</p> <ul style="list-style-type: none"> <li>• 2/21-22/24: DCISC meeting</li> <li>• 5/22/24: “webcast of NRC ASLB hearing on DCNPP license”</li> <li>• 5/30/24: “DCNPP IPRP Seismic Review”</li> <li>• 6/20-21/24: DCISC meeting</li> <li>• 7/19/24: Tour of DCNPP</li> <li>• 10/9-10/24: DCISC meeting</li> </ul> <p>A4NR also claimed 32.55 hours for Geesman driving to the June DCISC meeting and the July tour of DCNPP as well as \$857.32 for lodging. However, nowhere in this claim does A4NR describe how their attendance at these events were necessary or substantially contributed to the decision-making process. We therefore reduce all hours A4NR claimed for attending, driving to and from, and lodging at these events, which breaks down as follows:</p> <p><i>Attorney, Expert, and Advocate Fees:</i></p> <ul style="list-style-type: none"> <li>• Geesman: 47.63 hours</li> <li>• Weisman: 54.65 hours</li> </ul> <p><i>Other Fees:</i></p> <ul style="list-style-type: none"> <li>• Geesman: 32.55 hours driving</li> </ul> <p><i>Costs:</i></p> <ul style="list-style-type: none"> <li>• \$857.32 for lodging</li> </ul> <p><u>Documents with No Claimed Contributions in Part II.A (28.13 hours reduced)</u>  In Part II.A, A4NR did not provide any claimed contributions for their work on their Opening Comments on PG&amp;E’s Update to Prepared Testimony (Fall Update), Reply Comments on PG&amp;E’s Fall Update, and Reply Comments to the Proposed Decision (PD). Since A4NR did not claim any substantial contributions for their work on these three documents or identify how these efforts contributed to the decision making process, we reduce all hours A4NR requested for their work on them, which breaks down as follows:</p> <p><i>Opening Comments on PG&amp;E Fall Update (12.46 hours)</i></p>

Item	Reason
	<ul style="list-style-type: none"> <li>• Geesman: 12.46 hours <i>Reply Comments on PG&amp;E Fall Update (2.28 hours)</i></li> <li>• Geesman: 2.28 hours <i>Reply Comments on PD (13.39 hours)</i></li> <li>• Geesman: 12.42 hours</li> <li>• Weisman: 0.97 hours</li> </ul>
[4] Excessiveness, Duplication of Efforts, & Inefficient Hours	<p>We reduce 281.76 hours from A4NR's claimed work as described below for being excessive.</p> <p><b><u>Internal Duplication (26.76 hours reduced)</u></b></p> <p>The Commission compensates intervenors for reasonable and efficient participation that contributes to the development of the record and aids in decision-making. However, we find that A4NR's claimed hours reflect a significant duplication of effort. Specifically, multiple representatives—whether attorneys or experts—worked on the same issues, attended the same meetings, hearings, or workshops, and participated in activities where only one representative would have been sufficient, given the limited scope of the issues involved.</p> <p>Accordingly, we find that the involvement of multiple representatives in these instances was not justified and resulted in excessive hours that did not provide added value to the proceeding. We reduce Weisman and Geesman's work by 50%, or 26.76 hours, for each call, email, or event that they both participated at to ensure that only reasonable and non-duplicative efforts are compensated, which breaks down as follows:</p> <ul style="list-style-type: none"> <li>• Geesman: 13.88 hours reduced</li> <li>• Weisman: 12.88 hours reduced</li> </ul> <p><i>Calls</i></p> <p>A4NR claimed 16.05 hours across 14 timesheet entries for calls between Geesman and Weisman on 5/24/24, 6/11/24, 8/5/24, 8/29/24, 9/4/24, 10/29/24, and 12/4/24.</p> <p><i>Emails</i></p> <p>A4NR claimed 2.99 hours across 44 timesheet entries for emails between Geesman and Weisman. These entries were described as “email w. client” for Geesman and “email w/Atty” for Weisman. While some internal communications may be reasonable for compensation, the 46 entries, representation nearly 15% of all timesheet entries in this claim, appear excessive.</p>

Item	Reason
	<p><i>CPUC Meetings, Workshops, Evidentiary Hearings, Ex Partes, and Oral Arguments</i></p> <p>A4NR claimed 34.48 hours across 20 timesheet entries for meetings where both Geesman and Weisman attended (17.71 hours (Geesman) and 16.77 hours (Weisman)). This included:</p> <ul style="list-style-type: none"> <li>• 4/24/24: Workshop on PG&amp;E’s Application</li> <li>• 5/31/24: Prehearing Conference</li> <li>• 8/26/24: “All Party Meet-and-Confer”</li> <li>• 9/11-12/24: Evidentiary Hearings</li> <li>• 12/12-13/24: Ex Partes with Commissioners’ staff</li> <li>• 12/16/24: Oral Arguments</li> </ul> <p><u>Excessive Hours Claimed for Issues 1 – 4 Identified in Part III.A.c (255.00 hours reduced)</u></p> <p>Section 1801.3(b) states that it is the intent of the California Legislature that the Intervenor Compensation program is “administered in a manner that encourages the <i>effective</i> and <i>efficient</i> participation of all groups that have a stake in the public utility regulation process” (emphasis added). A4NR claimed 211.8255 hours on Issue 1: “PG&amp;E forecast revenue requirement”, 50.1105 hours on Issue 2: “PG&amp;E proposed reallocation of RA and GHG attributes”, 58.8125 hours on Issue 3: “PG&amp;E proposed VPF spending plan”, and 207.2015 hours on Issue 4: “compliance with D.23-12-036 and D.22-12-005.” This totals over 525 hours on these four issues.</p> <p>While A4NR’s arguments may have been helpful, the number of hours claimed is excessive relative to their impact on the underlying decision. The burden of proof rests with the intervenor to show that each hours claimed was spent productively and contributed substantially to the decision. In this instance, A4NR has not met that burden. Accordingly, we reduce 255.00 hours from A4NR on Issues 1 to 4 as explained below.</p> <p><i>Claimed Contributions as listed in Part II.A</i></p> <p>In Part II.A of this request for compensation, A4NR lists 10 contributions they made towards D.24-12-033. As discussed in Part II.A above, the Commission found that A4NR did not substantially contribute to the decision-making process for claimed contributions #4, 7, 8, 9, and 10. That leaves five claimed contributions that A4NR may receive compensation for:</p> <ul style="list-style-type: none"> <li>• Claimed contribution #1: A4NR challenged PG&amp;E’s failure to</li> </ul>

Item	Reason
	<p>comply with D.22-12-005's direction to use government funding for certain transition costs "to the greatest extent possible" or explain why it had not done so.</p> <ul style="list-style-type: none"> <li>• Claimed contribution #2: A4NR objected to PG&amp;E's VPF spending plan for featuring projects that duplicate what a public utility is already required to fund under Section 451, and specifically criticized PG&amp;E's initial inclusion of five gas-related projects in its VPF spending plan as inconsistent with the "public purpose priorities" requirement of the statute (Protest at 6 – 7).</li> <li>• Claimed contribution #3: A4NR objected to PG&amp;E's proposed use of a Tier 3 Advice Letter, rather than a formal Application, for review of future VPF spending plans because "PG&amp;E's oscillating process for planning VPF expenditures lacks sufficient maturity to inspire confidence"</li> <li>• Claimed contribution #5: A4NR objected to PG&amp;E's dysfunctional proposed schedule for the proceeding, refusing to waive its right to the time prescribed by Rule 14.3 for Opening and Reply Comments on a Proposed Decision (Protest at 7 – 8) and later exercising its right under Rule 13.14 to request oral argument in a ratemaking proceeding</li> <li>• Claimed contribution #6: A4NR opposed PG&amp;E's proposed modification of D.23-12-036's method for allocating Diablo Canyon's RA and GHG attributes to jurisdictional LSEs</li> </ul> <p>We find that for these five claimed contributions that they are related to the following issues A4NR identified in Part III.A.c:</p> <ul style="list-style-type: none"> <li>• Issue 1: "PG&amp;E forecast revenue requirement": claimed contribution #1.</li> <li>• Issue 2: "PG&amp;E proposed reallocation of RA and GHG attributes": claimed contribution #6.</li> <li>• Issue 3: "PG&amp;E proposed VPF spending plan": claimed contributions #2 and #3.</li> <li>• Issue 4: "compliance with D.23-12-036 and D.22-12-005": claimed contributions #1, #3, and #6 .</li> <li>• Issue 5: "general": claimed contribution #5.</li> </ul> <p><i>Issue 1: "PG&amp;E forecast revenue requirement" (100.00 Hours reduced)</i></p> <p>A4NR claimed 211.8255 hours of work on Issue 1. This was the primary issue in the proceeding and the Commission devoted more than 30 pages of D.24-12-033 to its discussion (see "6. PG&amp;E's Forecasted Cost and Requested Revenue Requirements" of D.24-12-033). The only references A4NR made to that section of the</p>

Item	Reason
	<p>decision are in claimed contributions #1 and #4. However, as explained above, A4NR did not make a substantial contribution to the decision-making process with respect to claimed contributions #4.</p> <p>A4NR claimed over 200 hours for work on Issue 1, which we find excessive considering their contributions here were limited. As discussed in the CPUC Discussion column of Part II.A.1 above, the decision rejected A4NR’s claimed contributions #1 as overly broad.</p> <p>A4NR focused on only two of the nine sub-issues of Issue 1: O&amp;M costs (claimed contribution #1) and Federal and State Income Tax Gross-Up on Fixed Management (claimed contribution #4).<sup>14</sup> Additionally, A4NR’s only recommendation on this issue was not adopted in full or in part by the Commission. None of the seven other sub-issues are mentioned.</p> <p>Consequently, we find that A4NR’s advocacy on Issue 1 was inefficient and ineffective, and the 211.8255 hours claimed for this issue were excessive, especially considering that they only touched upon two of the nine sub issues within Issue 1, and none of their recommendations were adopted. Accordingly, we reduce 100.00 hours from A4NR’s work on Issue 1 after all of the above reductions, which breaks down as follows.</p> <ul style="list-style-type: none"> <li>• Geesman: 95.00 hours reduced</li> <li>• Weisman: 5.00 hours reduced</li> </ul> <p><i>Issue 2: “PG&amp;E proposed reallocation of RA and GHG attributes” (25.00 hours reduced)</i></p> <p>A4NR claimed 50.113 hours of work on Issue 2. Above we found that claimed contribution #6 was A4NR’s only claimed contribution in Part II.A that substantially contributed to the decision-making process on Issue 2. Claimed contribution #6 also overlaps with Issue 4 as one of the main topics was compliance with D.24-12-033. In Part II.A, we found that A4NR was one of several parties to oppose PG&amp;E’s proposal to reallocate RA and GHG attributes.</p> <p>While A4NR’s position to not adopt PG&amp;E’s proposal was adopted,</p>

<sup>14</sup> Header 6 of D.24-12-033 was labeled “PG&E’s Forecasted Cost and Requested Revenue Requirement”, and included the following subheaders: 6.1: “Operations and Maintenance Costs”, 6.2 “Statutory Fees”, 6.3 “RA Substitution Capacity Costs”, 6.4 “Nuclear Costs”, 6.5 “The Internal Revenue Service (IRS) Tax Law Normalization”, 6.6 “Federal and State Income Tax Gross-up on Fixed Management”, 6.7 “PG&E’s Generation and Generation Revenue Forecasts”, 6.8 “Working Cash Adjustment”, and “6.9 “Netting of CAISO Revenues”. See D.24-12-033 at 12-46.

Item	Reason
	<p>we find that A4NR's work on claimed contribution #6 on Issue 2 was excessive for the reasons stated. We therefore find it reasonable to reduce A4NR's work on Issue 2 by 25.00 hours, which breaks down as follows:</p> <ul style="list-style-type: none"> <li>• Geesman: 22.50 hours reduced</li> <li>• Weisman: 2.50 hours reduced</li> </ul> <p><i>Issue 3: "PG&amp;E proposed VPF spending plan" (30.00 hours reduced)</i>  A4NR claimed 58.8125 hours of work on Issue 3 with claimed contributions described above in Part II.A (claimed contributions #2 and #3). As we found in the CPUC discussion above, A4NR made a minimal contribution to the decision making process on claimed contribution #2. We also verified A4NR's claimed contribution #3, however, this claimed contribution overlaps with Issue 4 as it dealt a modification to D.23-12-036. For these reasons we find that A4NR's claimed contributions on Issue 3 were excessive. We therefore find it reasonable to reduce A4NR's work on Issue 3 by 30.00 hours, which breaks down as follows:</p> <ul style="list-style-type: none"> <li>• Geesman: 27.50 hours reduced</li> <li>• Weisman: 2.50 hours reduced</li> </ul> <p><i>Issue 4: "compliance with D.23-12-036 and D.22-12-005" (100.00 hours reduced)</i>  A4NR claimed 207.2015 hours of work on Issue 4, with claimed contributions described in Part II.A above (claimed contributions #1, #3, and #6). A4NR's arguments related to claimed contributions #1, #3, and #6 amounted to roughly 30 pages across five separate filings. We find that A4NR was inefficient in its use of time, as over 200 hours was not reasonably required to develop and present arguments totaling roughly 30 pages. The time claimed is excessive and not commensurate with the quality and quantity of the work produced.</p> <p>A4NR was not effective in its advocacy on these claimed contributions, nor in its overall use of time on Issue 4. As noted above regarding claimed contribution #1, A4NR's argument was not adopted in whole. Similarly, in Part II.A.6, the Commission agreed with A4NR to deny PG&amp;E's proposed allocation, but the conclusion was not based on A4NR's proposition that PG&amp;E could only make such modifications through a petition for modification. Thus, A4NR's use of time on Issue 4 was ineffective, given that their substantial contributions were limited and the number of hours claimed was excessive.</p> <p>Accordingly, we find that the 207.2015 hours claimed by A4NR for</p>

Item	Reason
	<p>advocacy on Issue 4 were excessive. We therefore reduce 100.00 hours from A4NR's remaining work on Issue 4, which break down as follows:</p> <ul style="list-style-type: none"> <li>• Geesman: 95.00 hours reduced</li> <li>• Weisman: 5.00 hours reduced</li> </ul> <p>In summary, although A4NR made contribution to some of the issues in this proceeding, its compensation request was excessive, exceeding \$380,000, the highest among all intervenors for this decision. For context, TURN requested approximately \$292,000, another intervenor requested approximately \$189,000, and four others requested between \$11,000-\$86,000. While each intervenor's claim is evaluated on its own merits and the Commission recognizes that their levels of participation may vary, some reasonable comparisons can be made. Based on those comparisons and A4NR's actual impact on this decision, we find that the final award granted here is appropriate and commensurate with its contribution.</p>
[5] Intervenor Responsibility for Transparency and Accuracy in Compensation Requests	<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. Intervenor compensation is funded by ratepayers, and the Commission takes seriously any effort to mislead or obscure the financial basis for a claim. 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>	No

If not:

Party	Comment	CPUC Discussion
<a href="#">A4NR</a>	<a href="#">D.25-12-041 approved a 2025 hourly rate for John Geesman of \$795. The Alliance for Nuclear Responsibility requests that one-half of this rate (i.e., \$397.50) be applied to Geesman's 12.5 claim preparation hours in 2025 rather than the lower rate (which had not been adjusted for the applicable COLA) used in the Proposed Decision.</a>	<a href="#">We reviewed A4NR's Comment and find the 2025 hourly rate awarded to Geesman in the Proposed Decision to be reasonable.</a> <a href="#">We also remind A4NR to submit its Comments on proposed decisions in accordance with Rule 14.3(b).</a>

**FINDINGS OF FACT**

1. Alliance for Nuclear Responsibility has made a substantial contribution to D.24-12-033.
2. The requested hourly rates for Alliance for Nuclear Responsibility's representatives, as adjusted herein, 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 \$84,091.50.

**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 \$84,091.50.
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 April 30, 2025, the 75<sup>th</sup> day after the filing of Alliance for Nuclear Responsibility's request, and continuing until full payment is made.
3. The comment period for today's decision is not 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>	D2412033		
<b>Proceeding(s):</b>	A2403018		
<b>Author:</b>	ALJ Atamturk		
<b>Payer(s):</b>	Pacific Gas and Electric Company		

### Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/ Disallowance
Alliance for Nuclear Responsibility	Feb. 14, 2025	\$381,664.52	\$84,091.50	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
John	Geesman	Consultant/ Attorney <sup>15</sup>	780 plus any COLA	2025	\$780.00
John	Geesman	Consultant/ Attorney <sup>15</sup>	780	2024	\$770.00
David	Weisman	Advocate <sup>16</sup>	230 plus any COLA	2025	\$250.00
David	Weisman	Advocate <sup>17</sup>	230	2024	\$240.00

**(END OF APPENDIX)**

<sup>15</sup> Geesman is a consultant as described in Part III.D, Item [1].

<sup>16</sup> Weisman is classified as an Expert – Communications Specialist – Level III for 2024.

<sup>17</sup> Weisman is classified as an Expert – Communications Specialist – Level IV for 2025.

<b>Summary report:</b> <b>Litera Compare for Word 11.14.1.3 Document comparison done on Fri</b> <b>1/30/2026 2:55:26 p.m.</b>	
<b>Style name:</b> Default Style	
<b>Intelligent Table Comparison:</b> Active	
<b>Original filename:</b> Workshare ORIGINAL A2403018 A4NR IComp PD.docx	
<b>Modified filename:</b> Workshare MODIFIED A2403018 A4NR IComp PD.docx	
<b>Changes:</b>	
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<a href="#"><u>Move From</u></a>	0
<a href="#"><u>Move To</u></a>	0
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<a href="#"><u>Table moves to</u></a>	0
<a href="#"><u>Table moves from</u></a>	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
<b>Total Changes:</b>	29