

Decision 26-02-022 February 5, 2026

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

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

Rulemaking 23-01-007
(Filed January 12, 2023)

**DECISION GRANTING COMPENSATION TO THE UTILITY REFORM
NETWORK FOR SUBSTANTIAL CONTRIBUTION
TO DECISION (D.) 25-06-002**

Intervenor: The Utility Reform Network	For contribution to Decision (D.) 25-06-002
Claimed: \$56,463.75	Awarded: \$54,093.75
Assigned Commissioner: Karen Douglas	Assigned ALJ: Nilgun Atamturk

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	<u>D.25-06-002</u> Considers party proposals on Phase 2 issues and makes determinations regarding the general framework and definitions for the use of surplus performance-based fees. Directs PG&E to consider affordability as a guiding principle when developing and implementing its Volumetric Performance Fee (VPF) Spending plan. Approves data templates for reporting on spending. Requires PG&E to estimate the number of customers benefiting from each VPF project.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812¹:

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

¹ All statutory references are to California Public Utilities Code unless indicated otherwise.

1. Date of Prehearing Conference:	3/17/2023	Verified
2. Other specified date for NOI:	See comment #1	
3. Date NOI filed:	3/08/2023	Verified; second NOI filed on 7/2/2024 as directed by Amended Scoping Memo and Ruling for Phase 2 of R.23-01-007, issued on 6/25/2024.
4. Was the NOI timely filed?		Yes
Showing of eligible customer status (§ 1802(b) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	A.21-12-007	Verified
6. Date of ALJ ruling:	05/31/2022	Verified
7. Based on another CPUC determination (specify):		
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:	A.21-12-007	Verified
10. Date of ALJ ruling:	05/31/2022	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes

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

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
1	The Order Instituting Rulemaking states "Any party that expects to claim intervenor compensation for its participation in this Rulemaking must file its notice of intent to claim intervenor compensation within 30 days of the deadline for filing of reply comments, except that notice may be filed within 30 days of a prehearing conference in the event that one is held." (Ordering Paragraph 11) The deadline for filing reply comments was March 6, 2023 and TURN's Notice of Intent was filed on March 8, 2023.	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. FRAMEWORK / Submission of VPF Spending Plans via Application TURN urged the Commission to reject PG&E's proposal to use an Advice Letter for proposing VPF spending plans and reporting on recorded expenditures. TURN argued	<u>TURN opening comments on Proposals for the Use of Volumetric Performance Fees, September 19, 2024, pages 7-8</u>	Verified

<p>that the Advice Letter process is inappropriate because it would deny parties due process and prevent meaningful Commission review.</p> <p>The Decision upholds the prior determinations (from D.23-12-036 and D.24-12-033) that VPF spending plans and reporting should occur through an annual application.</p>	<p><u>TURN reply comments on Proposals for the Use of Volumetric Performance Fees, October 3, 2024, pages 18-21</u></p> <p><u>D. 25-06-002, pages 8-9, Conclusion of Law 1.</u></p>	
<p>2. FRAMEWORK / Escalation rate for VPFs</p> <p>TURN opposed SBUA’s proposal to escalate VPFs at 3% annually through 2030. TURN noted that the labor escalator relied upon by SBUA to support this rate is inappropriate and that changes in generation are more important to overall collections. TURN also explained that the escalator would raise VPFs above levels proposed by PG&E.</p> <p>The Decision agrees with TURN’s “valid concerns about SBUA’s proposal” and rejects the proposed escalation methodology.</p>	<p><u>TURN opening comments on Proposals for the Use of Volumetric Performance Fees, September 19, 2024, pages 1-2</u></p> <p><u>D. 25-06-002, pages 17-19</u></p>	Verified
<p>3. FRAMEWORK / SBUA proposals</p> <p>TURN urged the Commission to reject several SBUA VPF proposals including the treatment of VPFs as “pre-tax earnings” and the use of VPFs to support building decarbonization by small businesses.</p>	<p><u>TURN opening comments on Proposals for the Use of Volumetric Performance Fees, September 19, 2024, pages 2-4</u></p>	Verified

<p>The Decision “agrees with TURN’s and CUE’s comments on SBUA’s proposal and declines to adopt SBUA’s recommendations.” (page 28) Specifically, the Decision states that “The Commission agrees with TURN” that VPFs should not be treated as pre-tax earnings. The Decision also finds an “insufficient justification” for prioritizing VPFs to support behind-the-meter solar and building decarbonization.</p>	<p><u>D. 25-06-002, pages 28-29</u></p>	
<p>4. REPORTING / Total Expense Spending</p> <p>TURN noted problems with PG&E’s proposed VPF reporting template including a failure to identify the use of VPFs to relieve shareholders of cost obligations. TURN urged the Commission to require PG&E to report on VPF spending with respect to both Maintenance Activity Types (MATs) and Major Work Categories (MWCs) to determine whether PG&E actually engaged in underspending or overspending on all related and relevant work.</p> <p>Although the Decision does not adopt TURN’s primary recommendations with respect to the VPF reporting template, the Decision adopts TURN’s alternate recommendation to require PG&E to report on total expense spending for individual Major Work Categories related to work</p>	<p><u>TURN reply comments on Proposals for the Use of Volumetric Performance Fees, October 3, 2024, pages 21-23</u></p> <p><u>Opening comments of TURN on Proposed Decision of ALJ Atamturk on Phase 2 issues, March 20, 2025, pages 4-7.</u></p> <p><u>D. 25-06-002, pages 25, 36-37, Ordering Paragraph 3.</u></p>	<p>Verified</p>

<p>funded by VPFs. Consistent with TURN's recommendation, the Decision requires PG&E to provide this information for a historical period that covers the most recent five years of data to support a "more thorough review" of VPF expenditures.</p>		
<p>5. REPORTING / Shareholder Benefits</p> <p>Based on the statutory framework and the relevant precedents, TURN urged the Commission to affirm that SB 846 does not permit PG&E to use VPFs to benefit its shareholders. TURN identified three separate statutory prohibitions on shareholder enrichment and noted that PG&E's proposal could result in prohibited direct or indirect benefits to shareholders.</p> <p>The Decision "acknowledges TURN's concerns about the templates not adequately showing whether VPF spending benefits shareholders" but declines to require any demonstration to determine whether shareholders have benefited.</p> <p>The Concurrence of Commissioner Houck agrees with TURN's concerns regarding the fungibility of cash and the ability of PG&E to use VPFs to benefit shareholders. The Concurrence also agrees that a cursory review of VPF spending plans could result in a "benefit</p>	<p><u>Proposal of TURN on Phase 2 Issues, August 15, 2025, pages 3, 5</u></p> <p><u>TURN reply comments on Proposals for the Use of Volumetric Performance Fees, October 3, 2024, pages 2-4</u></p> <p><u>Opening comments of TURN on Proposed Decision of ALJ Atamturk on Phase 2 issues, March 20, 2025, pages 1-3</u></p> <p><u>D. 25-06-002, page 25</u></p> <p><u>D. 25-06-002, Houck Concurrence, pages 6-7.</u></p>	<p>Verified</p>

shareholders contrary to the statute” and that “the Commission’s obligation in this proceeding is to ensure that revenue collected in VPFs do not enrich shareholders.”		
<p>6. PRIORITIZATION / Authority to reject or modify VPF plan</p> <p>TURN noted the Commission previously decided that it has the authority to modify or reject VPF spending plans and urged the Commission to affirm its authority to exercise this power if PG&E’s plan is deficient.</p> <p>The Concurrence of Commissioner Houck agrees with TURN’s view that “the Commission has authority to direct the utility in how it prioritizes where it spends VPF dollars as to the 6 public purpose areas identified in the statute. If PG&E does not adequately support its plan the Commission, using information in the record of that proceeding, may revise or redirect PG&E’s plan.”</p>	<p><u>Proposal of TURN on Phase 2 Issues, August 15, 2025, pages 3-4.</u></p> <p><u>D. 25-06-002, Houck Concurrence, pages 2-3</u></p>	Verified
<p>7. PRIORITIZATION / Use of VPFs to Promote Affordability and Substitute for Capital Investment</p> <p>TURN outlined the statutory, policy and economic basis for requiring PG&E to apply VPFs to offset capital expenditures on wildfire mitigation and energization projects rather than being used to backstop expense spending that could</p>	<p><u>Proposal of TURN on Phase 2 Issues, August 15, 2025, pages 3-15.</u></p> <p><u>TURN reply comments on Proposals for the Use of Volumetric Performance Fees, October 3, 2024, pages 4-18</u></p>	Verified

<p>benefit shareholders. TURN noted the crisis of affordability faced by ratepayers that justifies the use of VPFs to benefit ratepayers. TURN provided calculations to support its position, noted the urgent need for VPFs to support capital spending, and urged the Commission to require PG&E to prioritize these uses of the funds to benefit ratepayers.</p> <p>The amended Scoping ruling invited parties to submit proposals in Phase 2 regarding whether to continue the previously adopted framework for VPF expenditures.</p> <p>While the Decision does not adopt TURN's specific proposals, it "strongly encourages PG&E to take their underlying reasoning into account as a guiding principle during the VPF planning process." (page 16) The Decision explains that TURN's recommendation shares "a common theme" with similar recommendations by A4NR and CalCCA, "benefiting ratepayers through the efficient spending of VPFs in ways that reduce upward pressure on rates" (page 16). Recognizing the value of this goal, the Decision "encourage[s] PG&E to look for opportunities to structure and plan expenditures in ways that provide additional benefits for ratepayers". (page 17) Specifically, the Decision states that "VPF spending on</p>	<p><u>Assigned Commissioner Amended Scoping Memo, August 15, 2024, page 2, Issue 1.</u></p> <p><u>D. 25-06-002, pages 16-17</u></p>	
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<p>capital projects, particularly distribution and transmission projects, and the acceleration of existing projects, are options PG&E could consider in its VPF plans in order to reduce upward rate pressure.”(page 17) To support this outcome, the Decision “adopt[s] affordability as a guiding principle in VPF spending that PG&E is encouraged to apply.” (page 17) The Decision requires PG&E to “explain this alignment” with affordability in VPF spending plan submittals.</p> <p>The Concurrence of Commissioner Houck agrees with TURN’s concerns regarding the fungibility of cash and the ability of PG&E to use VPFs to benefit shareholders. The Concurrence finds that the Commission “should be directing PG&E to prioritize spending of VPFs in a way that reduces rates such as offsetting capital costs for energization or wildfire mitigation costs. Doing so would provide a material benefit for ratepayers while eliminating cost that would otherwise go into rate base.” (page 7)</p>	<p><u>D. 25-06-002, Houck Concurrence, pages 6-7</u></p>	
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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	Noted
c. If so, provide name of other parties: Alliance for Nuclear Responsibility (A4NR), Small Business Utility Advocates (SBUA), Green Power Institute (GPI)		Noted
d. Intervenor's claim of non-duplication: TURN's positions did not consistently align with any other intervenor. TURN opposed many recommendations made by SBUA, did not take positions on most recommendations made by GPI, and made proposals that were supported (but not duplicated) by A4NR. Even where there was some overlap with positions taken by other parties, TURN presented unique analysis. TURN's participation focused on identifying the potential for prohibited shareholder benefits and proposing various remedies that would protect ratepayers. TURN was the only party to present a comprehensive proposal on alternative uses for VPFs including analysis on the ratepayer benefits of applying these funds to offset capital spending. To the extent that any duplication occurred, it was unavoidable due to the nature of the litigation process and the array of issues addressed. TURN worked diligently to ensure that its involvement uniquely influenced the outcome of the final Decision.		Noted

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
<p>a. Intervenor’s claim of cost reasonableness:</p> <p>As demonstrated in the substantial contribution section, TURN’s participation had a significant impact on the outcome of the final decision in Phase 2. Although Phase 2 did not authorize any specific cost recovery in rates, TURN’s contributions resulted in the following elements of the final decision:</p> <ul style="list-style-type: none"> • Adopting affordability as a guiding principle, encouraging PG&E to use VPFs in a manner that reduces upward rate pressure including their use to offset capital expenditures, and requiring PG&E to explain the alignment between VPF spending and affordability in its spending plan submittals. • Rejecting a requirement to excessively escalate VPFs over time, an outcome that would increase costs to ratepayers. • Requiring PG&E to report on total expense spending across Major Work Categories as part of any reporting on VPF expenditures used to fund incremental work. • Affirming the requirement that the Commission will continue to review Volumetric Performance Fee spending plans, and recorded spending, through a formal application process rather than an informal Advice Letter. <p>Given these specific and substantial contributions, the benefits associated with TURN’s participation far exceed the cost of TURN’s participation in this proceeding. TURN’s claim should be found to be reasonable.</p>	Noted
<p>b. Reasonableness of hours claimed:</p> <p>TURN devoted the minimum number of hours to reviewing rulings, drafting pleadings, reading comments submitted by other parties, and evaluating proposed decisions. TURN’s pleadings were highly substantive given the amount of time devoted to the task.</p> <p>The number of hours devoted to the wide range of issues and process in this case demonstrates the efficiency of TURN’s staff. Moreover, the time devoted to each task was reasonable in light of the complexity of the issues presented. Given the level of success achieved by TURN in this proceeding, the amount of time devoted by staff to the process should be found to be fully reasonable.</p>	Noted

Reasonableness of Staffing

Matthew Freedman

TURN's lead attorney was Matthew Freedman. Mr. Freedman served as the lead drafter for comments and participated in TURN's single ex parte meeting.

Robert Finkelstein

TURN General Counsel Robert Finkelstein provided support for TURN's comments on the issue of prioritizing VPFs to offset wildfire mitigation capital and assessing potential overspending on wildfire mitigation expenses.

Thomas Long

TURN Director of Legal Strategy Tom Long provided limited support for TURN's Phase 2 proposal relating to the potential double recovery of wildfire mitigation costs.

Jennifer Dowdell

TURN Senior Policy Expert Jennifer Dowdell served as TURN's expert on the issue of prioritizing Volumetric Performance Fees to displace capital investment and identifying concerns regarding how PG&E may use VPFs to enrich shareholders.

Time spent on Ex Parte communications

TURN's request includes several hours devoted to an *ex parte* meeting with the office of Commissioner Houck. These hours include time spent making the initial request, preparing for the meetings, participating in the meetings, and drafting the required post-meeting *ex parte* notices. The Commission should find that hours spent on these *ex parte* communications represent the "reasonable costs of preparation for and participation in a hearing or proceeding." (Cal. Pub. Util. Code §1803) and that hours spent by advocates reflect costs "incurred by the customer in preparing or presenting" (§1802(j)) TURN's arguments to the Commission.

As noted in TURN's *ex parte* notice, the primary subject of the meeting was to identify flaws in the Proposed Decision relating to its failure to prioritize the use of VPFs to offset capital expenditures, the lack of any prohibition on PG&E using VPFs to benefit shareholders, and problems with the reporting template that did not require PG&E to disclose overall spending on Major Work Categories (MWC) receiving VPF funds (TURN

<p>notice of Ex Parte communication, April 21, 2025, page 1). Prior to the issuance of the final decision, the Proposed Decision was modified to include more comprehensive reporting requirements for spending across all MWCs. In addition, the Concurring Opinion of Commissioner Houck affirms many of TURN's critiques that were the subject of the Ex Parte meeting.</p> <p>The Commission has routinely approved compensation for <i>ex parte</i> activities by intervenors in decisions dating back for more than 20 years. A sampling of prior decisions awarding compensation for time devoted to <i>ex parte</i> communications include (but are not limited to) D.24-09-049 (in R.23-01-007), D.24-01-024, D.23-10-013, D.23-06-045, D.22-08-050, D.22-08-010, D.22-06-018, D.21-12-051, D.21-08-033, D.21-06-016, D.21-07-017, D.21-04-013, D.19-10-020, D.19-10-018, D.19-08-032, D.19-07-020, D.19-03-005, D.18-11-043, D.18-04-021, D.15-08-023, D.12-08-041.</p> <p><u>Compensation Request</u></p> <p>TURN's request also includes 9 hours devoted to the preparation of compensation-related filings. The time devoted to this compensation request is appropriate and should be found to be reasonable.</p>	
<p>c. Allocation of hours by issue:</p> <p>TURN has allocated all attorney time by issue area or activity, as evident on our attached timesheets. The following codes relate to specific substantive issue and activity areas addressed by TURN. TURN also provides an approximate breakdown of the number of hours spent on each task and the percentage of total hours devoted to each category (note that the numbers do not equal 100% due to rounding).</p> <p>General Participation (GP) – 7.5 hours – 10% of total</p> <p>General Participation work essential to participation that typically spans multiple issues and/or would not vary with the number of issues that TURN addresses. This includes reviewing Commission rulings and proposed decisions, case management, and reviewing pleadings submitted by other parties.</p> <p>General Framework and Definitions (FRAMEWORK) – 20.25 hours – 27.1% of total</p> <p>Work addressing whether the Commission should continue to use the general framework and definitions adopted in D.23-12-036 (Scoping issue #1) including the use of an application process for review of VPF plans, proposals for setting a VPF escalation rate and additional recommendations proposed by other parties.</p>	<p>Noted, totals 100%</p>

<p>Reporting on VPF Expenditures (REPORTING) – 9.25 hours – 12.4% of total</p> <p>Work addressing the reporting requirements for VPF spending including the scope of expense spending that must be included and efforts to identify whether prohibited shareholder benefits were realized by PG&E.</p> <p>Prioritization of VPF spending (PRIORITIZATION) – 31 hours – 41.5% of total</p> <p>Work to the development of alternative VPF spending priorities to lower rates and promote customer affordability, including displacing capital investment for energization and wildfire mitigation</p> <p>Discovery (DISC) – 4 hours – 5.3% of total</p> <p>Work devoted to performing discovery on PG&E and/or other parties relating to filings in this proceeding.</p> <p>Ex Parte (EX PARTE) – 2.75 hours – 3.7% of total</p> <p>Work devoted to participation in Ex Parte meetings with Commissioner offices relating to the Proposed Decision.</p> <p>Compensation – 9 hours</p> <p>Time spent on the preparation of compensation-related pleadings.</p> <p>-----</p> <p>TURN submits that under the circumstances this information should suffice to address the allocation requirement under the Commission’s rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.</p>	
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B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Jennifer Dowdell, TURN Energy Policy Expert	2024	15.50	\$495	D.25-01-053	\$7,672.50	13.50 [2]	\$495.00	\$6,682.50

Robert Finkelstein, TURN General Counsel	2024	2.50	\$875	D.24-07-033	\$2,187.50	2.50	\$875.00	\$2,187.50
Matthew Freedman, TURN Staff Attorney	2024	42.00	\$740	D.24-09-015	\$31,080.00	42.00	\$740.00	\$31,080.00
Matthew Freedman, TURN Staff Attorney	2025	14.25	\$805	D.25-05-018	\$11,471.25	14.25	\$795.00 [1]	\$11,328.75
Thomas Long, TURN Legal Director	2024	0.50	\$860	D.24-09-016	\$430.00	0.50	\$860.00	\$430.00
Subtotal: \$52,841.25						Subtotal: \$51,708.75		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Matthew Freedman	2025	9.0	402.50	50% of 2025 rate	\$3,622.50	6.00 [3]	\$397.50 [1]	\$2,385.00
Subtotal: \$3,622.50						Subtotal: \$2,385.00		
TOTAL REQUEST: \$56,463.75						TOTAL AWARD: \$54,093.75		
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer’s normal hourly rate</p>								

ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ²	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Matthew Freedman	March 29, 2001	214812	No
Robert Finkelstein	June 1990	124776	No
Thomas Long	December 1986	124776	No

C. Attachments Documenting Specific Claim and Comments on Part III³:

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Daily Time Records for Attorneys and Experts

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Matthew Freedman (Freedman) 2025 Hourly Rate	D.25-10-059 previously approved the 2025 rate of \$795 for Freedman. As Intervenor Compensation Claim Preparation hours are compensated at ½ preparer’s normal hourly rate, we apply the rate of \$397.50 for Freedman for 2025.
[2] Jennifer Dowdell (Dowdell) 2024 Hours	<u>Vague Hours (2.00 hours):</u> Time records for each individual included in the Claim must be provided and must chronologically list the following information, among other things, about each task included in the records: 1) date when the specific task was performed, 2) the issue in the proceeding that the task addressed (as identified in the Scoping Memo or by the ALJ), 3) description of the specific task, and 4) amount of the time spent on the task (in hours or hour fraction). See IComp Program Guide at 25. The following tasks are deemed as vague and are therefore disallowed:

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

³ Attachments not included in final Decision.

	<ul style="list-style-type: none"> 6/30/24, 2.00 hours claimed – “Draft DRs” TURN did not provide specific details to explain which issue area or for what purpose these data requests were prepared for. 2.00 hours are disallowed. <p>Minus the disallowance here of 2.00 hours, Dowdell’s 2024 hours now total 13.50.</p>
[3] Excessive IComp Claim Preparation	<p>Section 1801.3(f) provides that the Commission should administer the Intervenor Compensation Program “in a manner that avoids unproductive or unnecessary participation that duplicates the participation of similar interests otherwise adequately represented or participation that is not necessary for a fair determination of the proceeding.”</p> <p>We find the request for 9.00 hours to prepare TURN’s Intervenor Compensation Claim by Freedman to be unreasonable and excessive. Hours claimed must be reasonable, productive, effective, and efficient. We find that the hours claimed are excessive for the work produced and for breadth of this claim.</p> <p>As a result, we have reduced Freedman’s time spent preparing this IComp Claim by 3.00 hours, resulting in a total of 6.00 hours awarded.</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))

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

FINDINGS OF FACT

1. The Utility Reform Network has made a substantial contribution to D.25-06-002.
2. The requested hourly rates for The Utility Reform Network’s representatives, 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 \$54,093.75.

CONCLUSION OF LAW

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

ORDER

1. The Utility Reform Network is awarded \$54,093.75.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company shall pay The Utility Reform Network 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 October 29, 2025, the 75th day after the filing of The Utility Reform Network's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.
4. This decision is effective today.

Dated February 5, 2026, at Sacramento, California.

ALICE REYNOLD
President
DARCIE L. HOUCK
JOHN REYNOLDS
KAREN DOUGLAS
Commissioners

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

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:	D2602022	Modifies Decision?	No
Contribution Decision(s):	D2506002		
Proceeding(s):	R2301007		
Author:	ALJ Nilgun Atamturk		
Payer(s):	Pacific Gas and Electric Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	08/15/2025	\$56,463.75	\$54,093.75	N/A	See Part III D. CPUC Comments, Disallowances, and Adjustments.

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Jennifer	Dowdell	Expert	495	2024	\$495.00
Matthew	Freedman	Attorney	740	2024	\$740.00
Matthew	Freedman	Attorney	805	2025	\$795.00
Thomas	Long	Attorney	860	2025	\$860.00
Robert	Finkelstein	Attorney	875	2024	\$875.00

(END OF APPENDIX)