

Decision \_\_\_\_\_

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

Order Instituting Rulemaking  
Regarding Emergency Disaster  
Relief Program.

Rulemaking 18-03-011  
(Filed March 22, 2018)

**DECISION GRANTING COMPENSATION TO THE UTILITY REFORM NETWORK  
FOR SUBSTANTIAL CONTRIBUTION TO RESOLUTION M-4857, AND  
DECISIONS (D.) 20-07-011, (D.) 25-04-006 AND (D.) 25-08-026**

<b>Intervenor:</b> The Utility Reform Network (TURN)	<b>For contribution to Resolution M-4857, the implementation of D.20-07-011, and Decisions D.25-04-006 and D.25-08-026</b>
<b>Claimed:</b> \$53,355.00	<b>Awarded:</b> \$38,622.50
<b>Assigned Commissioner:</b> Alice Reynolds	<b>Assigned ALJs:</b> Colin Rizzo & Sasha Goldberg

**PART I: PROCEDURAL ISSUES**

<b>A. Brief description of Decision:</b>	<p><u>Resolution M-4857</u> extended the moratorium on fees for late payment and disconnection for non-payment of voice service for residential (including LifeLine) and small business customers through September 30, 2021. Resolution M-4857 also approved an additional moratorium on fees for late payment and disconnection for non-payment of voice service for residential (including LifeLine) and small business customers through December 31, 2021, as part of the Commission’s efforts to assist consumers during coronavirus pandemic, and authorized the Executive Director to issue one or more extensions to the moratorium beyond December 31, 2021, if necessary.</p> <p><u>D.20-07-011</u> required California’s facilities-based wireless providers to develop comprehensive resiliency strategies to prepare for catastrophic disasters and power outages and adopted a 72-hour backup power requirement for the wireless providers’ facilities and to ensure minimum service coverage is maintained during disasters or commercial grid outages. D.20-07-011 requires facilities-based wireless providers to detail their ability to maintain a minimum level of service and coverage during a disaster or power outage in annual advice letter filings.</p> <p><u>D.25-04-006</u> closed the Disaster Relief proceeding, R.18-03-011, with the consideration that the Commission may open a successor proceeding, and addressed potentially outstanding issues raised by parties.</p> <p><u>D.25-08-026</u> addressed TURN’s Application for Rehearing of D.25-04-006 by modifying D.25-04-006 and denying rehearing.</p>
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:<sup>1</sup>**

	<b>Intervenor</b>	<b>CPUC Verification</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	May 7, 2018	Verified
2. Other specified date for NOI:	N/A	

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

3. Date NOI filed:	June 6, 2018	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:	I.15-08-019	Verified
6. Date of ALJ ruling:	November 8, 2017	Verified
7. Based on another CPUC determination (specify):	N/A	
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:	I.15-08-019	Verified
10. Date of ALJ ruling:	November 8, 2017	Verified
11. Based on another CPUC determination (specify):	N/A	
12. Has the Intervenor demonstrated significant financial hardship?		Yes
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.25-08-026	Verified
14. Date of issuance of Final Order or Decision:	August 18, 2025	Verified
15. File date of compensation request:	October 16, 2025	Verified
16. Was the request for compensation timely?		Yes

## 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
<u>1. Overview</u> This claim covers TURN’s varied work toward the end of the Commission’s Disaster Relief rulemaking. In the seven years this docket was open, the		Noted

<p>Commission addressed many issues, but the work and inquiries reflected in this claim reflect two distinct but related Commission initiatives: (1) creating measures to protect utility customers affected by disasters and (2) creating resiliency requirements for facilities-based telecommunications providers to ensure that their services remain operational during a power outage or disaster. Earlier in this docket, the Commission created interim, then permanent, protections for customers of many different types of utility services and created required resiliency measures for facilities-based wireless and wireline providers. The work presented in this claim is TURN’s efforts to build on this foundation: advocacy for specific pandemic-era protections for telecommunications customers, permanent measures for LifeLine subscribers, and the expansion of customer protections and resiliency requirements to new groups and areas. Additionally, this claim includes TURN’s protests of compliance filings related to telecommunications resiliency requirements, work done to ensure that the state’s largest wireless providers were complying or making progress toward compliance with relevant state and federal regulations.</p>		
<p><u>2. Commission Jurisdiction to Enact a Disconnection Moratorium During the COVID-19 Pandemic for Voice Services</u></p> <p>In opening comments on the Draft Resolution M-4857, TURN, co-writing with CforAT, correctly predicted that a resolution enacting a moratorium on disconnections for non-payment for voice service would receive jurisdictional challenges from voice</p>	<p>Opening Comments of The Utility Reform Network &amp; Center for Accessible Technology on Draft Resolution M-4857 (DR M-4857 Opening Comments), filed on Sept. 8, 2021, at p. 1; Reply Comments of The Utility Reform Network &amp; Center for Accessible Technology</p>	<p>Verified</p>

<p>service providers and preemptively countered arguments that such a moratorium would be rate regulation. In reply comments, TURN rebutted specific arguments from CTIA challenging the Commission’s jurisdiction by distinguishing CTIA’s cited authority. This work resulted in a successful defense of Resolution M-4857, reaffirmed Commission jurisdiction/authority, and the Commission’s enactment of a moratorium on disconnections for non-payment and fees for late payment.</p>	<p>on Draft Resolution M-4857 (DR M-4857 Reply Comments), filed Sept. 13, 2021, at p. 2. Resolution M-4857 at pp. 4-5.</p>	
<p><u>3. Extension of the Moratorium on Disconnections for Non-Payment and Fees for Late Payment</u></p> <p><u>(a) Executive Director’s Authority to Extend the Moratorium</u>                  In its opening comments, CTIA’s argued that the Commission’s Executive Director should not have the authority to extend the moratorium, arguing that it would not be a ministerial decision. In reply comments, TURN addressed this argument, citing the fact that the Commission’s Rules generally give the Executive Director the authority to extend deadlines and arguing that extending the moratorium would merely be a continuation of existing Commission policies and thus ministerial. This work resulted in a successful defense of the mechanism for extending the moratorium, which the final version of the resolution kept.</p> <p><u>(b) Notice to Voice Service Providers of an Extension</u>                  In reply comments, TURN agreed with CTIA that providers should receive more than one day’s notice of extension of the moratorium but argued that 30 days “would be excessive” and instead</p>	<p>DR M-4857 Reply Comments at p. 3. Resolution M-4857 at OP 1.</p> <p>DR M-4857 Reply Comments at p. 3; Resolution M-4875 at pp. 6-7 (“TURN and CforAT noted that CTIA’s request to require 30 days’ notice was excessive and instead</p>	<p>Verified</p>

<p>recommended “a requirement for at least two weeks[‘] notice.” The Commission accordingly adopted a 14-day notice period.</p>	<p>proposed a 14-day notification period. In response to parties’ comments, we amend Resolution M-4857 to require the Executive Director to give carriers 14-days’ notice of an extension of the moratorium.”)</p>	
<p><u>4. Handling of Late Fees and Arrearages Post-Moratorium</u></p> <p><u>(a) Arrearages</u>                  In opening comments, TURN recommended that the Commission modify Draft Resolution M-4857 to address how providers should handle arrearages after the lifting of the moratorium. In reply comments, TURN rebutted CTIA’s argument that concerns about the eventual collection of arrearages should prevent the extension of the moratorium, highlighting that providers never have a guarantee that they will collect all arrearages and the fact that service providers had been unwilling to share data on arrearages. The Commission did not expressly address issues related to arrearages in Resolution M-4857, but it did extend the moratorium despite CTIA’s concerns. TURN’s advocacy flagged this important implementation issue for the Commission to consider in the future.</p> <p><u>(b) Late Fees</u>                  TURN additionally called on the Commission to revisit the moratorium’s treatment of late payment fees and asked the Commission to require providers to waive them in light of the significant duration of the moratorium. The Commission did not require such a waiver but did “strongly encourage” providers subject to the moratorium to do so.</p>	<p><u>(a) Arrearages</u>                  DR M-4857 Opening Comments at pp. 3-4; DR M-4857 Reply Comments at pp. 2-3. Resolution M-4857 at pp. 4-5.</p> <p><u>(b) Late Fees</u>                  DR M-4857 Opening Comments at pp. 2-3. Resolution M-4857 at p. 5 (“While we do not mandate it here, we strongly encourage telephone corporations subject to this resolution to waive all late fees for customers facing</p>	<p>Verified</p>

	financial hardship during the pendency of this moratorium.”)	
<p><u>5. Compliance with and Enforcement of Existing Resiliency Requirements</u></p> <p><u>(a) Wireline Resiliency Filings</u> In D.20-07-011, the Commission required facilities-based wireless providers to make annual advice letter filings about their resiliency plans—measures designed to ensure those carriers’ ability to maintain communications services in a power outage or disaster. TURN reviewed facilities-based wireless providers’ 2024 resiliency plan filings and protested three (AT&amp;T, T-Mobile, and Verizon) when their filings contained material errors or omitted required elements.</p> <p><u>(1) Clean Power Generation</u> D.20-07-011 requires wireless providers to submit detailed information about “clean generation and diesel generation near and long term approaches,” which includes a timeline of when the carrier anticipates it will be able to switch to renewable power generation from fossil fuel-powered backup generators and a providers’ efforts to develop agreements to make clean backup power generation more feasible. TURN’s protests pointed out that AT&amp;T, T-Mobile, and Verizon were not providing required information, were not making significant progress toward clean power generation, refused to make progress toward clean power generation, or were not updating their timelines for their transition from fossil fuel generators.</p> <p><u>(2) Cooperative Agreements</u> D.20-07-011 requires facilities-based wireless providers’ resiliency plans to include “cooperative agreements which</p>	<p><u>(a) Wireline Resiliency Filings</u> D.20-07-011 at OP 1.</p> <p><u>(1) Clean Power Generation</u> D.20-07-011 at pp. 112-113.</p> <p>TURN Protest of AT&amp;T Mobility AL 216 (Attachment 6) at pp. 2-4; TURN Protest of T-Mobile AL 49 (Attachment 7) at pp. 2-3; TURN Protest of Verizon AL 393 (Attachment 8) at pp. 2-4.</p> <p><u>(2) Cooperative Agreements</u> D.20-07-011 at pp. 96-104, OP 1.</p>	<p>Verified</p>

<p>are used to pool resources with other providers.” TURN’s protests pointed out that AT&amp;T, T-Mobile had not discussed their plans for complying with new federal rules regarding roaming under disaster agreements or if they were already in compliance with the new rules. TURN additionally noted that T-Mobile failed to explain how its participation in a voluntary industry framework met state or federal requirements, or how the framework contributed to its individual planning and coordination with other California providers, as D.20-07-011 requires.</p> <p><u>(3) Backup Power Sources</u> D.20-07-011 requires facilities-based wireless providers to provide information about their facilities, backup power solutions, and plans for refueling backup power generators. In its resiliency plan filing, T-Mobile provided only vague information about its refueling practices, backup power solutions, and ability to mobilize additional power generators from one vendor, leaving its ability to obtain generators from other sources unclear. TURN argued that T-Mobile should supplement its filings to better assure the Commission about T-Mobile’s ability to field adequate backup power solutions in a disaster or power outage, and thus, compliance with D.20-07-011.</p> <p>Due in part to the deficiencies that TURN identified in its protests, Communications Division Staff (CD) rejected each carrier’s resiliency plan filing and required the carriers to submit new filings. TURN’s protests improved California’s three largest wireless carriers’ compliance with crucial</p>	<p>TURN Protest of AT&amp;T Mobility AL 216 at pp. 4-5; TURN Protest of T-Mobile AL 49 at pp. 4-7; TURN Protest of Verizon AL 393 at pp. 4-5.</p> <p><u>(3) Backup Power Sources</u> D.20-07-011 at p. 112, OP 1. TURN Protest of T-Mobile AL 49 at pp. 3-4.</p> <p>Attachment 9 (February 12, 2024, E-Mail from CD re Rejection of Protested Advice Letters) (“The rejections were due to several factors, some of which were also identified by TURN in its protest letters.”)</p>	
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<p>required components of their annual resiliency filings.</p> <p><u>(b) Outstanding Compliance and Enforcement Issues</u></p> <p>In its comments on the ALJ's ruling requesting comment on closing the docket, TURN raised a couple issues that were either not addressed in this proceeding or that should be revisited: (1) a review of the effectiveness of the backup power requirements the Commission established for wireline and wireless providers earlier in the docket, (2) a holistic review of providers' compliance with the measures in timelines instituted in those decisions, and (3) consideration of a citations or fines process for non-compliance with resiliency requirements.</p> <p>In response to a proposed decision that found compliance and enforcement issues "beyond the scope of the current proceeding," TURN filed comments highlighting its, Cal Advocates', and the Center for Accessible Technology's protests of the wireless resiliency plans of all three major carriers, the fact that compliance with telecommunications resiliency requirements was a scoped issue, and the ongoing need for a penalty mechanism.</p> <p>The Commission closed the proceeding without addressing enforcement of existing requirements. However, the Commission has subsequently opened another rulemaking, R.25-07-014, which has preliminarily scoped questions in line with TURN's recommendations about an enforcement mechanism for non-compliance and how Commission Staff should evaluate</p>	<p><u>(b) Outstanding Compliance and Enforcement Issues</u></p> <p>ALJ Ruling Opening Comments at pp. 3-6; Reply Comments of TURN on the ALJ's Ruling Requesting Comment on Closing Rulemaking 18-03-011, filed Apr. 15, 2022 at pp. 1-3.</p> <p>PD Opening Comments at pp. 7-9; Reply Comments of TURN on the Proposed Decision of Commissioner Alice Reynolds (PD Reply Comments), filed Mar. 25, 2025, at pp. 2-4.</p> <p>Order Instituting Rulemaking, issued in R.25-07-014 (R.25-07-014 OIR) on Aug. 1, 2025, at p. 7.</p>	<p>Noted. <i>See</i> Part III D. [1-5] CPUC Comments, Disallowances, and Adjustments.</p>
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<p>provider claims that implementing backup power at specific sites is infeasible.</p>		
<p><u>6. Permanent Disaster Relief Protections for LifeLine Subscribers</u></p> <p>In the final years of this proceeding, TURN became the leading voice prompting the Commission to re-visit the issue of disaster relief protections for LifeLine subscribers. Disaster relief protections specific to LifeLine subscribers, such as the waiver of certain rules, are vital to ensuring that these subscribers remain enrolled in the program and keep their phone number and service as they rebuild their lives after a disaster. In D.19-08-025, the Commission adopted interim protections for LifeLine subscribers and determined it would address the issue later in the proceeding. This follow-up did not occur.</p> <p>TURN first brought the outstanding nature of this issue to the Commission’s attention in its comments on the ALJ’s ruling requesting comment on closing the docket, arguing that the Commission should keep the Disaster Relief docket open to institute permanent LifeLine disaster relief measures. When the Proposed Decision dismissed the issue as “extend[ing] beyond the scope of the current proceeding,” TURN filed comments to emphasize the importance of permanent measures and the prior, relevant, but unfinished record development in this docket, arguing again that because this vital issue was scoped and developed, the Commission should keep the docket open to address it.</p>	<p>D.19-08-025 at p. 31.</p> <p>Comments of TURN on the ALJ’s Ruling Requesting Comment on Closing Rulemaking 18-03-011 (ALJ Ruling Opening Comments), filed Apr. 1, 2022, at pp. 2-3; Opening Comments of TURN on the Proposed Decision of Commissioner Alice Reynolds (PD Opening Comments), filed Mar. 20, 2025, at pp. 1-7.</p> <p><i>See</i> D.25-04-006 at pp. 4-5.</p>	<p>Verified</p>

<p>When the Commission did not modify its determination that permanent LifeLine disaster relief measures were outside the scope and closed the proceeding, TURN filed an Application for Rehearing of D.25-04-006, arguing that the Commission's determination about the proceeding scope was inaccurate and that it had closed the Disaster Relief Rulemaking without resolving a scoped issue. In response, the Commission did not grant rehearing of D.25-04-006 but did confirm that LifeLine disaster relief measures were within the scope of the proceeding. Moreover, the Commission specifically modified D.25-04-006 to explain why it no longer intended to address permanent LifeLine disaster relief measures in the Disaster Relief docket and to clarify that it would not keep the docket open to address them, but that the interim measures remained in effect.</p> <p>Though the Commission did not follow TURN's recommendation to keep the docket open, it did confirm that LifeLine disaster relief measures were in scope and that the interim protections still apply. The Commission indicated that if more was needed in the future, it would address LifLine disaster relief measures in the LifeLine proceeding or another proceeding.</p>	<p><i>See generally</i> Application for Rehearing of Decision 25-04-006, filed May 8, 2025.</p> <p>D.25-08-026 at p. 2 (“TURN is correct that the issue of permanent LifeLine disaster relief protections is not beyond the scope of the proceeding.”), p. 3-4 (“... D.24-04-006 did not discuss why we no longer intended to address this issue in this proceeding. Thus, . . . we modify the Decision to provide clarifying language to note that LifeLine subscribers benefit from the generally available disaster relief protections established in this proceeding, and the interim protections for California LifeLine participants adopted in Decision 18-08-004 remain in effect.”).</p>	
<p><u>7. Expansion of Telecommunications Resiliency Requirements</u></p> <p><u>(a) Expansion of Areas Where the Commission Should Require Backup Power</u></p> <p>In response to the Proposed Decision that would close the rulemaking, TURN highlighted that the existing wireline and wireless backup power requirements, which are limited to Tier</p>	<p><u>(a) Expansion of Areas Where the Commission Should Require Backup Power</u></p> <p>PD Opening Comments at p. 10; PD Reply Comments at p. 1.</p>	<p>Noted. <i>See</i> Part III D. [1-5] CPUC Comments, Disallowances, and Adjustments.</p>

<p>2 and Tier 3 High Fire Threat Districts (HFTDs), do not adequately cover all areas that are at risk of natural disasters and therefore need resilient communications. To support Cal Advocates’ recommendation that the Commission use a new source of data to capture areas at risk of fires, TURN provided examples of fires with non-utility causes to underscore the need for the Commission to use data that captures more general fire hazard. The Commission determined this docket was not the place to review existing resiliency requirements and closed the proceeding without addressing this issue but, as discussed above, opened R.25-07-014, which has preliminarily scoped the question of whether it should extend resiliency requirements beyond Tier 2 and Tier 3 HFTDs "to include other areas, such as those areas frequently impacted by disasters, other communities frequently impacted by PSPS events."</p> <p><u>(b) Protections for Broadband Customers</u></p> <p>Similarly, TURN called for or supported calls for the extension of disaster relief protections to specific types of telecommunications customers. In opening comments on the ruling closing the rulemaking, TURN argued the Commission should keep the docket open to create these protections and pointed out that the Commission itself had recognized the importance of broadband access during the COVID-19 pandemic and that outages during the 2017-2019 wildfires and subsequent public safety power shutoff events had affected facilities used to provide broadband service. In its comments on the Proposed Decision, TURN flagged</p>	<p>PD Reply Comments at p. 2.</p> <p>R.25-07-014 OIR at p. 7.</p> <p><u>(b) Protections for Broadband Customers</u></p> <p>ALJ Ruling Opening Comments at pp. 8-9.</p> <p>PD Opening Comments at pp. 10-12.</p>	
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<p>consumers’ increasing reliance on broadband access to receive public safety information and recover from disasters and again asked the Commission to address the matter in this or a subsequent docket. The Commission determined this docket was not the place to create new protections for broadband customers and closed the proceeding without addressing this issue. D.25-04-006 concluded that the Commission may consider protections for broadband customers in its future rulemaking or a different, ongoing proceeding.</p>	<p>D.25-04-006 at COL 2.</p>	
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**B. Duplication of Effort (§ 1801.3(f) and § 1802.5):**

	Intervenor’s Assertion	CPUC Discussion
<p><b>a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?</b></p>	<p>Yes.</p>	<p>Verified</p>
<p><b>b. Were there other parties to the proceeding with positions similar to yours?</b></p>	<p>Yes.</p>	<p>Verified</p>
<p><b>c. If so, provide name of other parties:</b>  Cal Advocates, Center for Accessible Technology (CforAT)</p>		<p>Noted</p>
<p><b>d. Intervenor’s claim of non-duplication:</b>  This claim involves two joint filings between TURN and CforAT: the comments on Draft Resolution M-4857. TURN and CforAT divided drafting and research for these filings, and the development of both sets of comments was an iterative process with both organizations involved in each step, with each organization taking the lead on areas where it had the most expertise.  TURN independently filed the other filings discussed in this claim. The Commission should view this work as complementary to the work of other intervenors. While TURN and other intervenors like CforAT may have raised similar issues at times, their different constituencies and areas of</p>		<p>Noted</p>

<p>expertise caused them to have different areas of focus. For example, Cal Advocates, CforAT, and TURN each argued that the Commission should keep this docket to address outstanding issues, but each identified different issues. CforAT raised the need for the Commission to oversee the transition to clean backup power generators, Cal Advocates raised the communications needs for customers with disabilities, and TURN advocated for protections for LifeLine and broadband customers. Where TURN and other intervenors discussed similar issues in separate filings, such as the expansion of backup power requirements to areas outside of HFTDs at risk of natural disasters, TURN offered unique research and analysis to support distinctive arguments and recommendations.</p> <p>In other cases, TURN offered different recommendations to the Commission than other intervenors, such as recommending that the Commission keep the docket open to address permanent LifeLine subscriber disaster relief measures, instead of moving them to the LifeLine docket, as CforAT did.</p> <p>TURN’s protests of wireless resiliency plans were also complementary to the work of other intervenors. Between 2022 and 2025, TURN, Cal Advocates, and CforAT have each protested these compliance filings, but they have protested <i>different</i> wireless and wireline resiliency plan filings, ensuring a broader review of resiliency plans than any one party could undertake on its own.</p> <p>In D.20-09-003, a prior TURN intervenor compensation claim filed in this docket, the Commission did not find duplication of effort between TURN and other intervenors, and TURN recommends that the Commission find the same here. Overall, TURN’s coordination and cooperation with other intervenors reduced the total cost of intervenor participation while still allowing for meaningful participation and high-quality work product. For these reasons, TURN submits that the Commission should find no undue duplication between TURN’s participation and that of other parties.</p>	
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**PART III: REASONABLENESS OF REQUESTED COMPENSATION**

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

	<b>CPUC Discussion</b>
<p><b>a. Intervenor’s claim of cost reasonableness:</b></p> <p>This request seeks an award of approximately \$53,355.00 as the reasonable cost of its participation in the final years of this proceeding. Considering the</p>	<p>Noted. <i>See</i> Part III D. [1-5] CPUC Comments, Disallowances, and Adjustments.</p>

	CPUC Discussion
<p>issues presented and outcomes achieved, TURN respectfully requests that the Commission conclude that the amount requested is reasonable.</p> <p>In this docket, the Commission engaged in pathbreaking work to create protections for utilities and telecommunication customers affected by disasters and telecommunications resiliency requirements for facilities-based wireless and wireline service providers. TURN’s work presented in this claim resulted in policies that protected customers facing financial hardship during the COVID-19 pandemic, enhanced compliance with the Commission’s wireless resiliency plan requirements, and prompted the Commission to offer clarity on or address important outstanding issues in a successor rulemaking, which has set the Commission on a path to further expand and refine the resiliency requirements that keep telecommunications customers safe and connected during power outages and disasters.</p> <p>As is often the case for telecommunications proceedings in recent years, it is more difficult to quantify the dollar impacts of TURN’s work here than is the case in Commission proceedings addressing authorized revenue requirements or rates. Here, TURN’s advocacy contributed to outcomes with clear, substantial, and potentially life-saving benefits to telecommunications customers throughout California, though hard to quantify. TURN worked to protect customers’ access to telecommunications services during the COVID-19 pandemic, power outages, and during and after major disasters. TURN’s work directly contributed to building the record on specific disaster relief customer protections and telecommunications resiliency requirements—and also resulted increased provider compliance with those requirements.</p> <p>TURN strongly recommends that the Commission find TURN’s participation costs are reasonable, considering the consumer benefits.</p>	
<p><b>b. Reasonableness of hours claimed:</b></p> <p>TURN’s attorneys and advocates recorded a reasonable number of hours given the scope and scale of their work in this proceeding. This claim covers work on nine separate filings and related research, drafting, coordination, and preparation. The total hours of professional time included in this compensation request (approximately 117 hours of work, exclusive of compensation-related work) is equivalent to a little less than three weeks of full-time work by a single person.</p> <p>TURN reviewed its claimed hours for this proceeding and withheld hours spent on work that is arguably compensable. This cut time includes internal coordination, time reviewing other parties’ filings and conducting related</p>	<p>Noted. <i>See</i> Part III D. [1-5] CPUC Comments, Disallowances, and Adjustments.</p>

	CPUC Discussion
<p>research, negotiating relevant non-disclosure agreements, and time spent preparing this claim. The hours that TURN includes in this claim have a clear connection to TURN’s substantial contribution to this docket.</p> <p>TURN seeks compensation for approximately 10.75 hours that Christine Mailloux devoted to substantive issues in this proceeding. Ms. Mailloux was TURN’s sole drafter for comments on Draft Resolution M-4857. She led all TURN’s issue development for those filings and all coordination with co-filer CforAT.</p> <p>TURN seeks compensation for approximately 3.25 hours that Ashley L. Salas devoted to substantive issues in this proceeding. As a TURN staff attorney, Ms. Salas assisted Ms. Mailloux with research for TURN’s comments on Draft Resolution M-4857. As a LifeLine subject matter expert, she assisted Mrs. Villanueva with issue development of TURN’s opening comments on the Administrative Law Judge’s Ruling on closing the proceeding, drafted the section on LifeLine issues for those comments. Ms. Salas also contributed to the review and editing process on other issues in that filing and participated in strategy development for reply comments on the same ruling.</p> <p>TURN seeks compensation for approximately 27 hours that Brenda D. Villanueva devoted to substantive issues in this proceeding. As TURN’s lead attorney on this proceeding circa 2022 to 2024, Mrs. Villanueva was the main drafter of TURN’s opening and reply comments on the Administrative Law Judge’s Ruling on closing the proceeding. She also led drafting, research, and issue development of the protests of AT&amp;T’s, T-Mobile’s, and Verizon’s 2024 wireless resiliency plans. In all these filings, Mrs. Villaneuva leveraged her federal background in public safety and network reliability to offer a unique perspective and recommendations on disaster relief issues before the Commission.</p> <p>TURN seeks compensation for approximately 6.75 hours that Regina Costa devoted to substantive issues in this proceeding. Ms. Costa, as TURN’s Telecommunications Policy Director, assisted Mrs. Villanueva with research, issue development, drafting, and revisions of TURN’s reply comments on the Administrative Law Judge’s Ruling on closing the proceeding. Ms. Costa’s extensive background in Commission precedent and telecommunications networks complemented Mrs. Villaneuva’s efforts on that filing.</p> <p>TURN seeks compensation for approximately 20.25 hours that Leo Fitzpatrick devoted to substantive issues in this proceeding. Mr. Fitzpatrick, TURN’s Telecommunications Policy Analyst, supported Mrs. Villanueva by</p>	

	CPUC Discussion
<p>drafting, researching and revising discrete sections of the protests of AT&amp;T’s, T-Mobile’s, and Verizon’s 2024 wireless resiliency plans.</p> <p>TURN seeks compensation for approximately 38.25 hours that Alexandra Green, TURN’s Telecommunications Regulatory Attorney, devoted to substantive issues in this proceeding. Ms. Green was the lead drafter and researcher for TURN’s opening and reply comments on the Proposed Decision closing the proceeding, TURN’s application for rehearing of D.25-04-006, and this intervenor compensation claim. Ms. Green led issue development on those filings.</p> <p>TURN seeks compensation for approximately 10.75 hours that Thomas J. Long devoted to substantive issues in this proceeding. For the first half of 2025, Mr. Long served as both Director of Legal Strategy and interim managing attorney for TURN’s Telecommunications Team, where he supported Ms. Green with strategy and issue development on the filings she drafted and provided substantive feedback on the draft versions of those filings.</p> <p>In sum, the Commission should find that the number of hours claimed is fully reasonable in light of the substantial contributions TURN made in this proceeding.</p> <p><b><u>Alternative Proposal for Work on Issues Continued in Successor Rulemaking</u></b></p> <p>If the Commission does not find TURN’s claim for all hours in this proceeding to reasonably lead to a substantial contribution, TURN requests that the Commission not reject this compensation request out of hand or significantly reduce the hours eligible for compensation. Instead, TURN respectfully requests leave to submit claims for hours worked in this proceeding that can be applied to issues pending in the New Network Resiliency Rulemaking, R.25-07-014. As discussed in the Substantial Contribution section, above, TURN’s work coded as COMPLI and EXPSN can be applied to equivalent issues pending in that proceeding. TURN could rely on those hours to more efficiently develop parts of its advocacy in the New Network Resiliency Rulemaking.</p>	
<p><b>c. Allocation of hours by issue:</b></p>	<p>Noted. See Part III D. [1-5] CPUC Comments,</p>

				CPUC Discussion
The following codes relate to the substantive issues and activity areas addressed by TURN in this proceeding.				Disallowances, and Adjustments.
Code	Description	Hours	Allocation (other than)	
MORRS	Time spent drafting or preparing to draft opening and reply comments on Draft Resolution M-4857 that cannot be allocated to any other issue.	1.25	1.07%	
MORRS_EXTN	Time spent drafting or preparing to draft opening and reply comments on Draft Resolution M-4857 regarding the extension of the moratorium on late fees and disconnections for non-payment for voice service.	1.75	1.5%	
MORRS_JX	Time spent drafting or preparing to draft opening and reply comments on Draft Resolution M-4857 regarding the Commission's jurisdiction to instate a moratorium.	3.25	2.78%	
MORRS_AF	Time spent drafting or preparing to draft opening and reply comments on Draft Resolution M-4857 regarding arrearages and late fees.	3.25	2.78%	
RCR	Time spent drafting or preparing to draft opening and reply comments on the ALJ's Ruling Requesting Comment on Closing the Rulemaking that cannot be allocated to any other issue.	4.25	3.63%	
LLMES	Time spent advocating for and conducting relevant research regarding permanent disaster relief protections for LifeLine subscribers.	28.5	24.36%	
COMPLI	Time spent advocating for and conducting relevant research regarding potential measures (1) to ensure providers' compliance with existing telecommunications resiliency requirements and (2) regarding follow-up to relevant Commission enforcement actions.	18.25	15.6%	
EXPSN	Time spent advocating for and conducting relevant research	15.25	13.03%	

				CPUC Discussion
	regarding the expansion of disaster relief customer protections and telecommunications resiliency requirements.			
WSRP	Time spent drafting protests of or preparing to protest the 2024 wireless resiliency plan filings of AT&T, T-Mobile, and Verizon that cannot be allocated to another issue.	8.75	7.48%	
WSRP_CE	Time spent protesting or preparing to protest errors or omissions regarding clean backup power generation in the 2024 wireless resiliency plan filings of AT&T, T-Mobile, and Verizon.	7	5.98%	
WSRP_BACKUP	Time spent protesting or preparing to protest errors or omissions regarding backup power capabilities in the 2024 wireless resiliency plan filing of T-Mobile.	4.25	3.63%	
WSRP_COOP	Time spent protesting or preparing to protest errors or omissions regarding cooperative agreements with other providers in the 2024 wireless resiliency plan filings of AT&T, T-Mobile, and Verizon.	13	11.11%	
PD	Time spent drafting responses or preparing to respond to the Proposed Decision closing the proceeding that cannot be allocated to another issue.	3.5	2.99%	
Coord	Time spent communicating and coordinating with other intervenors.	4.75	4.06%	
Comp	Time devoted to preparation of compensation-related pleadings.	8.5	N/A	
<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>				

	CPUC Discussion

**B. Specific Claim:\***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Christine Mailloux, TURN Telecom. Managing Attorney	2021	10.75	\$695	D.24-09-010	\$7,471.25	10.75	\$695.00 [6]	\$7,471.25
Ashley L. Salas, TURN Attorney	2021	0.5	\$400	D.22-06-048	\$200.00	0.50	\$400.00	\$200.00
Ashley L. Salas, TURN Attorney	2022	2.75	\$415	D.23-04-020	\$1,141.25	2.25 [1]	\$415.00	\$933.75
Regina Costa, TURN Telecom. Policy Director	2022	6.75	\$620	D.23-05-031	\$4,185.00	2.25 [2]	\$620.00	\$1,395.00
Brenda D. Villanueva, TURN Telecom. Managing Attorney	2022	13.27 <sup>2</sup>	\$425	D.23-04-020	\$5,631.25	2.75 [3]	\$425.00	\$1,168.75
Brenda D. Villanueva, TURN Telecom.	2024	13.75	\$505	D.24-11-020	\$6,943.75	13.75	\$505.00	\$6,943.75

<sup>2</sup> Typographic error. TURN's timesheets confirm that Brenda Villanueva's 2022 hours total 13.25 not 13.27 hours.

CLAIMED						CPUC AWARD		
Managing Attorney								
Leo Fitzpatrick, TURN Telecom. Policy Analyst	2024	20.25	\$325	D.25-01-024	\$6,581.25	20.25	\$325.00	\$6,581.25
Thomas J. Long, TURN Director of Legal Strategy & Interim TURN Telecom. Managing Attorney	2025	10.75	\$885	Res. ALJ-393, 2024 Rate plus 3.46% COLA (See Comment 1)	\$9,513.75	7.00 [4]	\$880.00 [7]	\$6,160.00
Alexandra Green, TURN Attorney	2025	38.25	\$275	D.25-05-025	\$10,518.75	24.00 [5]	\$275.00	\$6,600.00
<b>Subtotal: \$52,186.25</b>						<b>Subtotal: \$37,453.75</b>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Alexandra Green, TURN Attorney	2025	8.5	\$137.50	Half of 2025 rate.	\$1,168.75	8.50	\$137.50	\$1,168.75
<b>Subtotal: \$1,168.75</b>						<b>Subtotal: \$1,168.75</b>		
<b>TOTAL REQUEST: \$53,355.00</b>						<b>TOTAL AWARD: \$38,622.50</b>		

\*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. Intervenors' 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 1/2 of preparer's normal hourly rate

CLAIMED		CPUC AWARD	
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR <sup>3</sup>	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Christine Mailloux	December 1993	167918	No
Ashley Salas	December 2015	308374	No
Brenda Villanueva	January 2021	334217	No
Thomas Long	December 1986	124776	No
Alexandra Green	December 2022	346771	No

### C. Attachments Documenting Specific Claim and Comments on Part III:<sup>4</sup>

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Timesheets for TURN Attorneys/Experts
Attachment 3	TURN hours allocated by issue
Attachment 4	TURN and CforAT Opening Comments on Draft Resolution M-4857
Attachment 5	TURN and CforAT Reply Comments on Draft Resolution M-4857
Attachment 6	TURN Protest of AT&T Mobility Advice Letter 216
Attachment 7	TURN Protest of T-Mobile Advice Letter 49
Attachment 8	TURN Protest of Verizon Advice Letter 393
Attachment 9	February 12, 2024, E-Mail from CD re Rejection of Protested Advice Letters
Comment #1	<p><u>2025 Rate for Thomas J. Long</u></p> <p>For Mr. Long's work in 2025, TURN requests that the Commission adjust his authorized 2024 rate of \$860 (D.24-09-016) by applying the annual escalation adjustment authorized by Resolution ALJ-393 for 2025 of 3.46%. TURN uses a 2025 rate of \$885 to prepare this claim.</p>

<sup>3</sup> This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

<sup>4</sup> Attachments not included in final Decision.

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

Item	Reason
<p>[1] Reduction of 2022 Hours for Ashley Salas</p>	<p>The IComp Program Guide page 4 states that "a request for an award of compensation may be filed after the issuance of a decision that resolves an issue on which the intervenor believes it made a substantial contribution." This claim only seeks compensation for work contributing to Resolution M-4857, the implementation of D.20-07-011, and D.25-04-006 and D.25-08-026.</p> <p>As TURN noted in Part II A., their work related to outstanding compliance and enforcement issues (coded as COMPLI) and expansion of telecommunications resiliency requirements (coded as EXPSN) was not addressed because the Commission determined that "these matters extend beyond the scope of the current proceeding" (D.25-04-006 at page 5).</p> <p>Therefore, all hours marked as "COMPLI" and "EXPSN" in TURN's timesheets are denied without prejudice and may be reconsidered in Rulemaking 25-07-014 if the hours contribute to the proceeding's resolution of the issues.</p> <p>Accordingly, we reduce 0.50 hours from Ashley Salas' 2022 hours for time associated with COMPLI and EXPSN.</p>
<p>[2] Reduction of 2022 Hours for Regina Costa</p>	<p>The IComp Program Guide page 4 states that "a request for an award of compensation may be filed after the issuance of a decision that resolves an issue on which the intervenor believes it made a substantial contribution." This claim only seeks compensation for work contributing to Resolution M-4857, the implementation of D.20-07-011, and D.25-04-006 and D.25-08-026.</p> <p>As TURN noted in Part II A., their work related to outstanding compliance and enforcement issues (coded as COMPLI) and expansion of telecommunications resiliency requirements (coded as EXPSN) was not addressed because the Commission determined that "these matters extend beyond the scope of the current proceeding" (D.25-04-006 at page 5).</p> <p>Therefore, all hours marked as "COMPLI" and "EXPSN" in TURN's timesheets are denied without prejudice and may be reconsidered in Rulemaking 25-07-014 if the hours contribute to the proceeding's resolution of the issues.</p> <p>Accordingly, we reduce 4.50 hours from Regina Costa's 2022 hours for time associated with COMPLI and EXPSN.</p>
<p>[3] Reduction of</p>	<p>The IComp Program Guide page 4 states that "a request for an award of compensation may be filed after the issuance of a decision that resolves an</p>

Item	Reason
2022 Hours for Brenda Villanueva	<p>issue on which the intervenor believes it made a substantial contribution." This claim only seeks compensation for work contributing to Resolution M-4857, the implementation of D.20-07-011, and D.25-04-006 and D.25-08-026.</p> <p>As TURN noted in Part II A., their work related to outstanding compliance and enforcement issues (coded as COMPLI) and expansion of telecommunications resiliency requirements (coded as EXPSN) was not addressed because the Commission determined that "these matters extend beyond the scope of the current proceeding" (D.25-04-006 at page 5).</p> <p>Therefore, all hours marked as "COMPLI" and "EXPSN" in TURN's timesheets are denied without prejudice and may be reconsidered in Rulemaking 25-07-014 if the hours contribute to the proceeding's resolution of the issues.</p> <p>Accordingly, we reduce 10.50 hours from Brenda Villanueva's 2022 hours for time associated with COMPLI and EXPSN.</p>
[4] Reduction of 2025 Hours for Thomas Long	<p>The IComp Program Guide page 4 states that "a request for an award of compensation may be filed after the issuance of a decision that resolves an issue on which the intervenor believes it made a substantial contribution." This claim only seeks compensation for work contributing to Resolution M-4857, the implementation of D.20-07-011, and D.25-04-006 and D.25-08-026.</p> <p>As TURN noted in Part II A., their work related to outstanding compliance and enforcement issues (coded as COMPLI) and expansion of telecommunications resiliency requirements (coded as EXPSN) was not addressed because the Commission determined that "these matters extend beyond the scope of the current proceeding" (D.25-04-006 at page 5).</p> <p>Therefore, all hours marked as "COMPLI" and "EXPSN" in TURN's timesheets are denied without prejudice and may be reconsidered in Rulemaking 25-07-014 if the hours contribute to the proceeding's resolution of the issues.</p> <p>Accordingly, we reduce 3.75 hours from Thomas Long's 2025 hours for time associated with COMPLI and EXPSN.</p>
[5] Reduction of 2025 Hours for Alexandra Green	<p>The IComp Program Guide page 4 states that "a request for an award of compensation may be filed after the issuance of a decision that resolves an issue on which the intervenor believes it made a substantial contribution." This claim only seeks compensation for work contributing to Resolution M-4857, the implementation of D.20-07-011, and D.25-04-006 and D.25-08-026.</p>

Item	Reason
	<p>As TURN noted in Part II A., their work related to outstanding compliance and enforcement issues (coded as COMPLI) and expansion of telecommunications resiliency requirements (coded as EXPSN) was not addressed because the Commission determined that “these matters extend beyond the scope of the current proceeding” (D.25-04-006 at page 5).</p> <p>Therefore, all hours marked as “COMPLI” and “EXPSN” in TURN’s timesheets are denied without prejudice and may be reconsidered in Rulemaking 25-07-014 if the hours contribute to the proceeding’s resolution of the issues.</p> <p>Accordingly, we reduce 14.25 hours from Alexandra Green’s 2025 hours for time associated with COMPLI and EXPSN.</p>
[6] Christine Mailloux’s 2021 Rate	D.24-09-019 verified a 2021 rate of \$695.00 for Christine Mailloux as a Legal – Attorney – V. We apply the same rate here.
[7] Thomas Long’s 2025 Rate	D.24-09-016 verified a 2024 rate of \$860.00 for Thomas Long as a Legal – Legal Director – IV. To the 2024 rate of \$860.00, we apply the 2025 annual escalation factor of 3.46%. The maximum of the Legal Director – IV 2025 range is \$884.24, so we round down to the nearest \$5.00 for a 2025 rate of \$880.00. We find this rate reasonable and adopt it here.

**PART IV: OPPOSITIONS AND COMMENTS**  
**Within 30 days after service of this Claim, Commission Staff**  
**or any other party may file a response to the Claim (see § 1804(c))**

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

**FINDINGS OF FACT**

1. The Utility Reform Network has made a substantial contribution to Resolution M-4857, D.20-07-011, D.25-04-006, and D.25-08-026.
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 \$38,622.50.

**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 \$38,622.50.
2. Within 30 days of the effective date of this decision, the California Public Utilities Commission shall pay The Utility Reform Network 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 December 30, 2025, the 75<sup>th</sup> 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.

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>	Resolution M4857, D2007011, D2504006, and D2508026		
<b>Proceeding(s):</b>	R1803011		
<b>Author:</b>	ALJ Colin Rizzo and ALJ Sasha Goldberg		
<b>Payer(s):</b>	California Public Utilities Commission		

## Intervenor Information

<b>Intervenor</b>	<b>Date Claim Filed</b>	<b>Amount Requested</b>	<b>Amount Awarded</b>	<b>Multiplier?</b>	<b>Reason Change/Disallowance</b>
The Utility Reform Network	10/16/25	\$53,355.00	\$38,622.50	N/A	See Part III. D CPUC Comments, Disallowances, and Adjustments

## Hourly Fee Information

<b>First Name</b>	<b>Last Name</b>	<b>Attorney, Expert, or Advocate</b>	<b>Hourly Fee Requested</b>	<b>Year Hourly Fee Requested</b>	<b>Hourly Fee Adopted</b>
Christine	Mailloux	Attorney	\$695	2021	\$695.00
Regina	Costa	Advocate	\$620	2022	\$620.00
Ashley	Salas	Attorney	\$400	2021	\$400.00
Ashley	Salas	Attorney	\$415	2022	\$415.00
Brenda	Villanueva	Attorney	\$425	2022	\$425.00
Brenda	Villanueva	Attorney	\$505	2024	\$505.00
Leo	Fitzpatrick	Advocate	\$325	2024	\$325.00
Alexandra	Green	Attorney	\$275	2025	\$275.00
Thomas	Long	Attorney	\$885	2025	\$880.00

(END OF APPENDIX)