

Decision 26-04-042 April 30, 2026

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

Application of Pacific Gas and Electric Company to Recover Helms Uprate Costs.

Application 23-12-014  
(Filed December 20, 2023)

**DECISION GRANTING COMPENSATION TO THE UTILITY REFORM NETWORK FOR SUBSTANTIAL CONTRIBUTION TO DECISION (D.) 25-09-016**

<b>Intervenor:</b> The Utility Reform Network	<b>For contribution to Decision (D.) 25-09-016</b>
<b>Claimed:</b> \$196,296.37 <sup>3</sup>	<b>Awarded:</b> \$196,486.37
<b>Assigned Commissioner:</b> Christine Harada	<b>Assigned ALJ:</b> Justin Regnier

**PART I: PROCEDURAL ISSUES**

<b>A. Brief description of Decision:</b>	Approves and adopts the Settlement Agreement between Pacific Gas and Electric Company (PG&E), the Public Advocates Office at the California Public Utilities Commission, The Utility Reform Network, and Californians for Green Nuclear Power, Inc. Under the settlement, PG&E is obligated to take steps throughout the Helms Uprate Project that ensure that ratepayer funds will not continue to be expended should the project cease to be cost-effective. The Settlement also adopts a lower cost cap for the project, a lower contingency, and requires PG&E to apply federal tax credits in a manner that achieves maximum benefits for ratepayers. The Decision resolves the Phase I issues in this proceeding.
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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:	04/15/2024	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	04/18/2024	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:	A.23-06-008	Verified
6. Date of ALJ ruling:	03/20/2024 (with retroactive application)	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:	A.23-06-008	Verified
10. Date of ALJ ruling:	03/20/2024 (with retroactive application)	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.25-09-016	Verified
14. Date of issuance of Final Order or Decision:	09/22/2025	Verified
15. File date of compensation request:	11/20/2025	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	In A.23-06-008, an ALJ Ruling issued on March 20, 2024 found TURN demonstrated significant financial hardship and applied this finding retroactively to proceedings starting on or after June 1, 2023.	Verified. The ruling in A.23-06-008 issued on March 20, 2024 found that TURN demonstrated significant financial hardship and stated that this finding also applies retroactively.

**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
<p><b>1. COST CAP</b></p> <p>TURN expressed concern about the significant risks associated with the Helms Uprate project and argued for risk-sharing mechanisms that share cost responsibility between ratepayers and shareholders if total costs exceed 110% of the cost cap.</p> <p>The adopted settlement would allow PG&amp;E to avoid reasonableness review only for costs incurred up to the identified cap. In the event that costs exceed that cap, PG&amp;E may seek recover of excess costs in an application where these costs would be subject to a reasonableness review to determine whether some or all of the excess costs may be recovered from ratepayers or assigned to shareholders.</p>	<p><u>Ex. TURN-1, Direct Testimony of William Monsen, pages 3-4, 20-27</u></p> <hr/> <p><u>D.25-09-016, page 15, Appendix A (Settlement Agreement), Items 1 and 11.</u></p>	Verified
<b>2. INVESTMENT TAX</b>		Verified

<p><b>CREDIT</b></p> <p>TURN noted that the economic value of the Helms Uprate project relies heavily on the assumption that the project is eligible for the federal Investment Tax Credit (ITC). Given the risk that the ITC may be repealed or that the Uprate project may be found ineligible, TURN expressed concern that the Net Market Value may become negative. TURN recommended a mechanism to share the risk of ITC reductions between shareholders and ratepayers.</p> <p>In the event that a change in tax law results in an expectation that the full ITC will not be available for the project, the adopted settlement requires PG&amp;E to submit a Tier 3 Advice letter to either continue the project (if it remains cost effective) or terminate the project (if it is no longer cost effective). If terminated, canceled project costs would be subject to the limitations on stranded cost treatment outlined in the settlement. If parties agree that it remains more likely than not that the Uprate project will qualify for the full ITC notwithstanding the change in tax law, PG&amp;E shall submit a Tier 1 Advice Letter. PG&amp;E is required to consult with TURN and Cal Advocates within 120 days of an applicable change in tax law.</p>	<p><u>Ex. TURN-1, Direct Testimony of William Monsen, pages 6, 27-29, 51-55</u></p> <p><u>D.25-09-016, pages 16, 47, Appendix A (Settlement Agreement), Item 3(a), Attachment 1 (Item 5).</u></p>	
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<p>TURN objected to PG&amp;E’s proposal to normalize the ITC which would share the benefits between shareholders and ratepayers. TURN argued that the ITC should be subject to flow-through treatment, if permitted by the federal government, so the entire value benefits ratepayers. TURN’s testimony calculates that this change would save ratepayers \$66.1 million (NPV) compared to normalization.</p> <p>The adopted settlement requires PG&amp;E to use flow through treatment of ITC realized for the Uprate project, rather than normalization, if allowed by the US Treasury Department.</p>	<p><u>Ex. TURN-1, Direct Testimony of William Monsen, pages 8, 60-64</u></p> <p><u>D.25-09-016, pages 19, 50, Appendix A (Settlement Agreement), Item 9.</u></p>	
<p><b>3. CONTINGENCY</b></p> <p>TURN opposed PG&amp;E’s use of a 50% contingency factor for the Helms Uprate project capital cost. Given the significant planning and time spent on the project to date, TURN argued that cost uncertainty is lower than claimed by PG&amp;E. TURN recommended the use of a 10% contingency factor for purposes of establishing any cost cap.</p> <p>The adopted settlement specifies that, for purposes of calculating the cost cap, a 30% contingency factor would be used. This level represents the midway point between the TURN and PG&amp;E recommendations. The</p>	<p><u>Ex. TURN-1, Direct Testimony of William Monsen, pages 6-7, 39-45</u></p> <p><u>D.25-09-016, page 15, Appendix A (Settlement Agreement), Item 1.</u></p>	<p>Verified</p>

<p>Decision additionally recognizes that it is not appropriate for PG&amp;E to rely on only a Class 5 estimate (which was used to justify the 50% contingency) for purposes of the Uprate Project.</p>	<p><u>D.25-09-016, pages 40-41.</u></p>	
<p><b>4. COST EFFECTIVENESS</b></p> <p>TURN expressed concern that, due to an optimistic schedule for completion of the Uprate project, and the use of a single set of cost and modeling assumptions, there are significant risks that the project will not be cost-effective for ratepayers. TURN noted that alternative resource options like lithium ion batteries may prove less expensive than the Helms Uprate, especially as batteries become less expensive over time. TURN recommended modeling various sensitivities to assess a range of scenarios. TURN recommended adopting measures to mitigate ratepayer risks if the project is no longer cost effective due to delays, higher costs, or lower-than-anticipated new capacity as envisioned. TURN noted that the Helms Uprate project could yield negative Net Market Values under some combination of these drivers. To address these concerns, TURN recommended “guardrails” to protect ratepayers.</p> <p>In the event of material changes in certain project costs (interconnection or licensing),</p>	<p><u>Ex. TURN-1, Direct Testimony of William Monsen, pages 3-4, 7-8, 18-20, 34-37, 45-51, 56</u></p>	<p>Verified</p>

<p>lower expected capacity uprate, or delays in receiving full capacity deliverability status, the adopted settlement directs PG&amp;E to either submit a Tier 3 Advice Letter to increase the cost recovery cap (if the project remains cost-effective) or terminate the project (if the project is no longer cost effective). The settlement further establishes a process for PG&amp;E to meet and confer with Cal Advocates and TURN relating to any such Advice Letter and identifies a “two-step cost effectiveness showing” required to evaluate whether continuation of the project is warranted based on a comparison of Net Market Value between the Uprate Project and alternatives. The settlement permits TURN and Cal Advocates to oppose the Advice Letter on the basis that the project “no longer provides net ratepayer benefits.” If terminated, canceled project costs would be subject to the limitations on stranded cost treatment outlined in the settlement.</p>	<p><u>D.25-09-016, pages 16-18; Appendix A (Settlement Agreement), Items 2(a), 2(b), 3(b), 3(c), 4, 5, 6, 10</u></p>	
<p><b>5. STRANDED COSTS</b></p> <p>TURN identified risks to ratepayers in the event that unamortized equipment at Helms is removed from service before the end of their useful lives due to the Uprate project. TURN recommended that PG&amp;E be allowed to recover any unamortized value but not earn a rate of return on assets</p>	<p><u>Ex. TURN-1, Direct Testimony of William Monsen, pages 9, 65-66</u></p>	<p>Verified</p>

<p>that are no longer used and useful.</p> <p>The adopted settlement would remove the treatment of abandoned investments at Helms due to the Uprate project and have the ratemaking treatment addressed in a future General Rate Case. Under the settlement, parties are free to argue for their preferred outcome in that General Rate Case.</p> <p>The adopted settlement also adopts a stranded cost framework that would allow PG&amp;E to recover canceled or abandoned costs for the Helms Uprate project over a three year timeframe with no rate of return if PG&amp;E demonstrates the costs were reasonably incurred.</p>	<p><u>D.25-09-016, pages 19, 46, Appendix A (Settlement Agreement), Item 8.</u></p> <p><u>D.25-09-016, page 21, Appendix A (Settlement Agreement), Item 10.</u></p>	
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**B. Duplication of Effort (§ 1801.3(f) and § 1802.5):**

	<b>Intervenor’s Assertion</b>	<b>CPUC Discussion</b>
<b>a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?</b>	Y	Verified
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	Y	Verified
<b>c. If so, provide name of other parties:</b>		Noted, Cal Advocates
<p><b>d. Intervenor’s claim of non-duplication:</b>                      Apart from Cal Advocates and CalCCA, no other party presented testimony in this proceeding. The testimony from CalCCA did not address any issues overlapping with TURN. While Cal Advocates and TURN did address some similar issues, TURN’s presentation and analysis was unique and covered additional topics not addressed by Cal Advocates.</p>		Noted

<p>Where TURN and Cal Advocates did take similar positions, the two organizations worked together as part of the settlement process. TURN and Cal Advocates coordinated on joint settlement positions and strategy. This approach minimized duplication and allowed both parties to work collectively towards achieving best results for ratepayers.</p> <p>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 Settlement and final Decision.</p>	
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**C. Additional Comments on Part II:**

#	Intervenor’s Comment	CPUC Discussion
1	<p>The issues in this proceeding were resolved via settlement rather than briefing. As is the case in a typical settlement, no party achieved specific and measurable outcomes on every recommendation contained in testimony. The Commission should recognize that the settlement process requires parties to compromise and forgo relief on one issue in exchange for a favorable outcome one or more other issues. These trade-offs are integral to the settlement process. To the extent that TURN raised any issue in testimony that was not explicitly addressed in the settlement, the Commission should find that the overall suite of concessions contained in the adopted Settlement support the conclusion that TURN made a substantial contribution on all of the disputed issues that were resolved by the Settlement.</p> <p>The Commission has consistently encouraged parties to pursue settlements in a wide range of</p>	Noted

#	Intervenor’s Comment	CPUC Discussion
	<p>proceedings. TURN’s willingness to enter into Settlement negotiations and compromise on a wide array of disputed issues should not be used as the basis for a finding that TURN failed to make a substantial contribution on any individual recommendation that was not expressly reflected in the final agreement.</p>	

**PART III: REASONABLENESS OF REQUESTED COMPENSATION**

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

	CPUC Discussion
<p><b>a. Intervenor’s claim of cost reasonableness:</b></p> <p>As demonstrated in the substantial contribution section, TURN’s positions were extensively reflected in the all-party settlement ultimately adopted by the Commission. The settlement process involved TURN, Cal Advocates and PG&amp;E. No other parties actively participated in negotiations. The involvement of TURN was critical to the achievement of a final agreement that responds to, and reflects, TURN’s top priorities in this case.</p> <p>The Settlement results in the following modifications to PG&amp;E’s application that provide concrete benefits to ratepayers:</p> <ul style="list-style-type: none"> <li>- A reduction of the Uprate project cost cap from \$462 million to \$400 million due to the use of a 30% contingency factor rather than PG&amp;E’s proposed 50% contingency. Any costs in excess of the cap will be subject to a reasonableness review.</li> <li>- A requirement for PG&amp;E to update the Commission on any changes in the expected eligibility of the Uprate project for the federal Investment Tax Credit and assess whether the project remains cost-effective. If the project is no longer cost effective, the Settlement provides a process for canceling the project and limiting PG&amp;E’s ability to earn a return on any stranded costs.</li> <li>- A requirement for PG&amp;E to apply “flow through” treatment of the Investment Tax Credit as opposed to the normalization approach PG&amp;E sought. The use of “flow through” treatment will ensure that</li> </ul>	<p>Noted</p>

	CPUC Discussion
<p>100% of the value of the credit is passed through to ratepayers. TURN’s testimony calculates that this change is expected to save ratepayers \$66.1 million (NPV).</p> <ul style="list-style-type: none"> <li>- A process for evaluating whether certain changes in forecasted project costs or expected benefits trigger an Advice Letter filing in which continuation of the project would be compared to alternative resource options. In the event that alternative resource options provide better value to ratepayers, this process would result in a cancelation of the project with limits on PG&amp;E’s ability to earn any return on stranded costs.</li> </ul> <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>	
<p><b>b. Reasonableness of hours claimed:</b></p> <p>TURN devoted the minimum number of hours to reviewing rulings, drafting pleadings, developing testimony, reading comments submitted by other parties, and evaluating proposed decisions. 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> <p><b>Reasonableness of Staffing</b></p> <p><u>Matthew Freedman</u></p> <p>Staff attorney Matthew Freedman was TURN’s lead in this proceeding. Mr. Freedman represented TURN at all Commission hearings, directed overall case strategy, reviewed and edited data requests, assisted with the development of testimony, led TURN’s participation in settlement negotiations, and worked with other parties to draft and support a final agreement.</p> <p><u>William Monsen</u></p> <p>Outside consultant William Monsen served as TURN’s primary expert witness in this proceeding. Mr. Monsen was involved in the development of case strategy, was the primary drafter of discovery requests, and drafted extensive prepared testimony on all topics of concern to TURN. Mr. Monsen participated in settlement negotiations and advised TURN on both strategy and substance related to that process.</p>	<p>Noted</p>

	CPUC Discussion
<p><u>Jennifer Dowdell</u></p> <p>TURN Senior Policy Expert Jennifer Dowdell provided limited support on the sole issue of the Investment Tax Credit treatment for the Helms uprate project. Ms. Dowdell provided analysis to Bill Monsen for inclusion in testimony.</p> <p><u>Sylvie Ashford</u></p> <p>TURN Energy Policy Analyst Sylvie Ashford participated in the Helms site visit and assisted with discovery related to observations gained during the tour.</p> <p><u>Reina Yanagiba</u></p> <p>TURN legal assistant Reina Yanagiba provided limited assistance with discovery related to this proceeding.</p> <p><u>Travel costs</u></p> <p>TURN staff participated in a tour of the Helms Pumped Storage Facility in late August 2024 organized by PG&amp;E. The tour was focused on the proposed uprate project. The three staff members from TURN were Staff Attorney Matthew Freedman, Energy Policy Analyst Sylvie Ashford, and Energy Policy Analyst Jalal Awan. In addition to TURN, staff from the Public Advocates Office assigned to this proceeding and the CPUC’s Energy Division also participated. TURN staff incurred costs for travel (mileage) and lodging relating to the tour. Given that this tour occurred in connection with the Helms uprate proceeding, that all active parties were invited, and that Commission staff traveled to participate, the Commission should find that the modest expenditures related to this tour (including staff time) were fully reasonable. For lodging, TURN staff camped for a single night at Camp Edison which, due to the tour occurring during peak summer season, required a two-night minimum reservation. In addition to lodging and mileage, TURN requests compensation for travel time, and time at the tour, by Staff Attorney Matthew Freedman.</p> <p><u>Compensation Request</u></p> <p>TURN’s request also includes 13.5 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><b>c. Allocation of hours by issue:</b></p>	<p>Noted. Typographic error: DISC is</p>

	CPUC Discussion
<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><b>General Participation (GP) – 46.5 hours – 12.71% of total</b></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 multi-issue pleadings, testimony submitted by PG&amp;E and other tasks not allocable to a particular issue. Also includes negotiations over scheduling proposals, attendance at briefings held by PG&amp;E and preliminary meetings to discuss TURN litigation strategy.</p> <p><b>Commission-ordered activities (COMM) – 11.25 hours – 3.08% of total</b></p> <p>Time devoted to participation in Commission-required meet-and-confer sessions, status conferences, and prehearing conferences. Also involves time reviewing ALJ ruling and developing the Commission-mandated case management statement.</p> <p><b>Discovery (DISC) – 50.75 hours – 13.78% of total</b></p> <p>Development of discovery requests and responses by TURN staff. Review of discovery responses by PG&amp;E and other parties. TURN served PG&amp;E with 15 separate data request sets in this proceeding.</p> <p><b>Cost Cap (COST CAP) – 38.85 hours – 10.62% of total</b></p> <p>Analysis of PG&amp;E cost cap proposal and development of TURN alternative including risk sharing mechanism.</p> <p><b>Investment Tax Credit (ITC) – 33.50 hours – 9.16% of total</b></p> <p>Evaluation of Investment Tax Credit (ITC) benefits for Uprate Project, risks that Project may not fully benefit, and impacts on total cost effectiveness for ratepayers. Additionally, analysis of the benefits of flow-through treatment compared to normalization.</p> <p><b>Contingency (CONTINGENCY) – 21.50 hours – 5.88% of total</b></p> <p>Evaluation of PG&amp;E’s proposed 50% contingency factor for capital costs and development of TURN’s alternative 10% recommendation.</p> <p><b>Cost Effectiveness Analysis (CE) – 105.00 hours – 28.70% of total</b></p> <p>Evaluation of PG&amp;E cost effectiveness modeling assumptions, identification of potential delay and cost increases, comparison of Helms to</p>	<p>allocated 13.87% in their timesheets.</p>

	CPUC Discussion
<p>alternative resource options, and consideration of lower value due to smaller-than-anticipated capacity increases or delays in achieving full capacity deliverability status. Development of alternative measures to mitigate ratepayer risks if project is no longer cost-effective.</p> <p><b>Stranded Costs (STRAND) – 5.50 hours – 1.50% of total</b></p> <p>Assessment of risks relating to stranded costs if the Uprate project causes existing assets at Helms to be prematurely removed from service. Development of recommendations to minimize ratepayer risks and obligations.</p> <p><b>Settlement (SETTLE) – 45.00 hours – 12.30% of total</b></p> <p>Participation in Settlement negotiations, development of settlement positions, and coordination between TURN and Cal Advocates on settlement matters.</p> <p><b>Coordination (COORD) – 1.5 hours – 0.41% of total</b></p> <p>Coordination with other parties regarding various case matters and substantive positions.</p> <p><b>Helms Tour (TOUR) – 6.5 hours – 1.78% of total</b></p> <p>Participation in Helms site visit with PG&amp;E staff, CPUC Energy Division staff, and Cal Advocates staff.</p> <p><b>Travel – 10 hours</b></p> <p>Time spent by TURN staff Attorney Matthew Freedman driving to/from the Helms Pumped Storage Facility for the August 2024 site tour.</p> <p><b>Compensation – 13.5 hours</b></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>	

**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	3.75	\$495	D.25-01-053	\$1,856.25	3.75	\$495.00	\$1,856.25
Matthew Freedman, TURN Attorney	2024	81.75	\$740	D.24-09-015	\$60,495.00	81.75	\$740.00	\$60,495.00
Matthew Freedman, TURN Attorney	2025	34.75	\$795	D.25-10-059	\$27,626.25	34.75	\$795.00	\$27,626.25
Reina Yanagiba, TURN Legal Assistant	2024	0.50	\$100	D.24-06-021	\$50.00	0.50	\$100.00	\$50.00
Sylvie Ashford, Energy Policy Analyst	2024	1.50	\$245	D.25-06-030	\$367.50	1.50	\$245.00	\$367.50
William Monsen, MRW & Associates	2024	222.6	\$395	D.25-10-059	\$87,927.00	222.60	\$395.00 [1,2]	\$87,927.00
William Monsen, MRW & Associates	2025	21.00	\$410	D.25-10-059 + Res ALJ-393; See Comment #1	\$8,610.00	21.00	\$410.00 [1,2]	\$8,610.00
<b>Subtotal: \$186,932</b>						<b>Subtotal: \$186,932.00</b>		
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 \$
Matthew Freedman, TURN Attorney	2024	10.00	\$370	50% of 2024 Hourly Rate	\$3,700.00	10.00	\$370.00	\$3,700.00

CLAIMED						CPUC AWARD		
<i>Subtotal: \$3,700</i>						<i>Subtotal: \$3,700.00</i>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Matthew Freedman, TURN Attorney	2024	1.00	\$370	50% of 2024 Hourly Rate	\$370.00	1.00	\$370.00	\$370.00
Matthew Freedman, TURN Attorney	2025	12.50	\$397.5	50% of 2025 Hourly Rate	\$4,968.75	12.50	\$397.50	\$4,968.75
<i>Subtotal: \$5,338.75</i>						<i>Subtotal: \$5,338.75</i>		
COSTS								
#	Item	Detail			Amount	Amount		
1.	Travel for Helms tour - mileage expense	SF Bay Area to Helms and return - 486 miles x \$0.67/mile			\$325.62	\$325.62		
2.	Lodging for Helms tour	1 night at Camp Edison (2 night minimum payment required)			\$190.00	\$190.00		
<i>Subtotal: \$325.62<sup>2</sup></i>						<i>Subtotal: \$515.62</i>		
<b><i>TOTAL REQUEST: \$196,296.37<sup>3</sup></i></b>						<b><i>TOTAL AWARD: \$196,486.37</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. 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.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate</p>								

<sup>2</sup> The correct subtotal request is \$515.62.

<sup>3</sup> The correct total request is \$196,486.37.

CLAIMED			CPUC AWARD
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR <sup>4</sup>	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Matthew Freedman	March 29, 2001	214812	No

**C. Attachments Documenting Specific Claim and Comments on Part III:<sup>5</sup>**

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Attorney and Experts Time Sheet Detail
Attachment 3	TURN hours Allocated by Issue
Attachment 4	William Monsen (MRW) 2024 addendum to consulting agreement and 2025 invoice
Attachment 5	Expense Detail
Comment #1	<p><b>2025 Hourly Rate for William Monsen</b></p> <p>TURN requests that the Commission adopt a 2025 hourly rate of \$410 for TURN External Consultant William Monsen. This rate is equal to the rate authorized by the Commission in D.25-10-059 for Mr. Monsen’s work for 2024 (\$395) adjusted by the annual escalation methodology adopted in Resolution (Res.) ALJ-393.</p> <p>The annual escalation methodology adopted in Res. ALJ-393 is based on the annual percentage change in the Bureau of Labor Statistics Employment Cost Index, Table 5, for the Occupational Group “Management, Professional, and Related excluding Incentive Paid Occupations.” (Res. ALJ-393, p. 4; Intervenor Compensation Market Rate Study, Final Report, p. 8). The percent change for this occupational group for the 12-months ended December 2024 is 3.46% (See <a href="https://www.bls.gov/news.release/eci.t05.htm">https://www.bls.gov/news.release/eci.t05.htm</a>). The application of this escalation to Mr. Monsen’s 2024 rate yields \$408.67 which is rounded to \$410 (the nearest \$5 increment).</p> <p>Mr. Monsen charged TURN \$410 for his work in 2025. In attachment 3, TURN provides a written agreement for 2024 assigning Mr. Monsen a \$395</p>

<sup>4</sup> This information may be obtained through the State Bar of California’s website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

<sup>5</sup> Attachments not included in final Decision.

Attachment or Comment #	Description/Comment
	hourly rate and an invoice from 2025 showing a \$410 hourly rate. These documents demonstrate that TURN was billed the rates being requested in this compensation request for Mr. Monsen’s services in both years.

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

Item	Reason
[1] Monsen 2024 and 2025 Hourly Rates	<p>TURN has confirmed that William Monsen is a consultant. Pursuant to the Commission’s 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 the floor for a given experience level.<sup>6</sup> Per the Intervenor Compensation 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>TURN has confirmed that it paid William Monsen \$395.00 per hour for work in this proceeding in 2024. We find this rate reasonable given Monsen’s experience and approve this rate here.</p> <p>TURN has confirmed that it paid William Monsen \$410.00 per hour for work in this proceeding in 2025. We find this rate reasonable given Monsen’s experience and approve this rate here.</p> <p>The award determined herein for Monsen’s contribution in this proceeding shall be paid in full to Monsen, and no portion of this part of the award shall be kept by TURN. 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, TURN did not provide all the documentation pertaining to the contract terms between Intervenor and Consultant in the</p>

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<sup>6</sup> D.07-01-009, D.08-04-010, and ALJ Resolution ALJ 235.

Item	Reason
	initial claim and waited until the Commission requested supplemental documentation which delays the processing of the claim.
[2] Consultant Rate Disclaimer	<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.</p> <p>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. Intervenor 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>	Yes

**FINDINGS OF FACT**

1. The Utility Reform Network has made a substantial contribution to D.25-09-016.
2. The requested hourly rates for The Utility Reform Network’s representatives 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 are reasonable and commensurate with the work performed.

4. The total of reasonable compensation is \$196,486.37.

**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 \$196,486.37.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company 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 February 3, 2026, 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 April 30, 2026, at San Francisco, California.

JOHN REYNOLDS  
President  
DARCIE L. HOUCK  
KAREN DOUGLAS  
CHRISTINE HARADA  
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**

<b>Compensation Decision:</b>	D2604042	<b>Modifies Decision?</b>	No
<b>Contribution Decision(s):</b>	D2509016		
<b>Proceeding(s):</b>	A2312014		
<b>Author:</b>	Justin Regnier		
<b>Payer(s):</b>	Pacific Gas and Electric Company		

**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	11/20/25	\$196,296.37 <sup>3</sup>	\$196,486.37	N/A	Typographic error in request

**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>
Matthew	Freedman	Attorney	\$740	2024	\$740.00
Matthew	Freedman	Attorney	\$795	2025	\$795.00
Reina	Yanagiba	Legal Assistant	\$100	2024	\$100.00
Jennifer	Dowdell	Expert	\$495	2024	\$495.00
Sylvie	Ashford	Expert	\$245	2024	\$245.00
William	Monsen	Expert <sup>7</sup>	\$395	2024	\$395.00
William	Monsen	Expert <sup>7</sup>	\$410	2025	\$410.00

**(END OF APPENDIX)**


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<sup>7</sup> William Monsen served as a consultant to TURN.