

Decision 26-05-029 May 14, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Advance Demand Flexibility Through Electric Rates.

Rulemaking 22-07-005
(Filed July 14, 2022)

DECISION GRANTING COMPENSATION TO THE UTILITY REFORM NETWORK FOR SUBSTANTIAL CONTRIBUTION TO ENERGY DIVISION DISPOSITION OF SAN DIEGO GAS AND ELECTRIC COMPANY ADVICE LETTERS 4572-E AND 4582-E, RESOLUTION E-5354, RESOLUTION E-5355, AND RESOLUTION E-5356

Intervenor: The Utility Reform Network	For contribution to Decision (D.): Energy Division disposition of SDG&E Advice Letters 4572-E and 4582-E, Resolution E-5354, Resolution E-5355, Resolution E-5356
Claimed: \$17,285	Awarded: \$16,732.50
Assigned Commissioner: John Reynolds	Assigned ALJ: Carolyn Sisto

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	<p>Energy Division disposition of SDG&E Advice Letters 4572-E and 4582-E</p> <p>Approves SDG&E’s Advice Letters relating to the implementation of California Alternative Rates for Energy (CARE) discounts pursuant to Ordering Paragraph 4 of Decision (D.) 24-05-028.</p> <p>Resolution E-5354, Resolution E-5355, Resolution E-5356</p> <p>Approved Income-Graduated Fixed Charge (IGFC) implementation proposals submitted by PG&E, SCE and SDG&E pursuant to Ordering Paragraph 3(c) of D.24-05-028.</p>
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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. Date of prehearing conference:	09/16/2022	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	09/27/2022	Verified
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:	May 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:	May 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.25-08-049, <i>See</i> Comment #1	Verified
14. Date of issuance of Final Order or Decision:	08/29/2025	Verified
15. File date of compensation request:	10/27/2025	Verified
16. Was the request for compensation timely?		Yes

¹ 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	<p>TURN’s compensation request involves hours related to the implementation Advice Letters filed by the three major Investor-Owned Utilities for the implementation of changes adopted in D.24-05-028 (in Rulemaking (R.) 22-07-005). The Commission resolved the concerns raised by TURN in an August 19, 2025 disposition letter of SDG&E AL 4582-E and in Resolution E-5354 (PG&E), Resolution E-5356 (SCE), and Resolution R-5355 (SDG&E). While TURN’s substantial contributions relate to the implementation of D.24-05-028, this work occurred too late to include in the filing of a compensation request on D.24-05-028.</p> <p>D.25-08-049 closed the proceeding (Ordering Paragraph 8). Pursuant to CPUC Rule 17.3, a request for an award of compensation shall be filed “in event later than 60 days after the issuance of the decision closing the proceeding.”</p> <p>Since these Resolutions all address issues within the scope of R.22-07-005 (and required by D.24-05-028), TURN submits that the closure of the proceeding represents an appropriate and lawful trigger for the filing of this compensation request.</p>	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
<p>1.SDG&E AVERAGE EFFECTIVE CARE DISCOUNT</p> <p>TURN filed protests to two Advice Letters filed by SDG&E implementing changes to the CARE discount methodology pursuant to D.24-05-028. The protests explained that SDG&E inappropriately sought to use the Advice Letter process reduce the average effective CARE discount from 35% (authorized in D.15-07-001) to 32.5%. TURN argued that SDG&E had not indicated an intent to reduce the CARE discount in R.22-07-005 and nothing in D.24-05-028 authorized SDG&E to reduce its CARE discount percentage. The protest explains that any changes to the “average effective CARE discount” should occur in a relevant Commission proceeding where parties can litigate the reasonableness of the proposal.</p> <p>In response to TURN’s protests, SDG&E agreed to revise its original proposal by retaining its previously authorized 35% CARE discount subject to the new</p>	<p><u>TURN protest to SDG&E Advice Letter 4572-E, December 30, 2024</u></p> <p><u>TURN protest to SDG&E Advice Letter 4582-E, January 17, 2025</u></p> <p><u>SDG&E Advice Letter 4572-E-A, January 24, 2025.</u></p>	<p>Verified</p>

<p>methodology adopted in D.24-05-028. This revision fully addressed TURN’s stated concerns. The Commission’s disposition letter explained that SDG&E initially “misinterpreted” the direction provided in D.24-05-028 and that Energy Division staff met with SDG&E after TURN’s protest “to help clarify SDG&E’s understanding of the correct formulation of the discount.” (ED disposition letter of SDG&E AL 4572-E, Attachment 1, page 3). After submitting a revised proposal made by SDG&E in response to TURN’s protest, the Energy Division approved SDG&E Advice Letters 4572-E-A and 4582-E-A.</p>	<p><u>SDG&E Advice Letter 4582-E-A, February 3, 2025.</u></p> <p><u>Energy Division disposition letter for SDG&E Advice Letter 4582-E/4582-E-A, August 19, 2025</u></p> <p><u>Energy Division disposition letter for SDG&E Advice Letter 4572-E/4572-E-A, August 19, 2025</u></p>	
<p>2.INCOME-GRADUATED FIXED CHARGE IMPLEMENTATION</p> <p>TURN and the Natural Resources Defense Council (NRDC) raised a number of specific concerns about the Advice Letters submitted by Pacific Gas & Electric (PG&E), Southern California Edison (SCE) and San Diego Gas & Electric (SDG&E) regarding Income-Graduated Fixed Charge (IGFC) implementation.</p> <p>First, TURN/NRDC urged PG&E to incorporate information explaining eligibility for a discount tier of the fixed charge into existing and planned CARE/FERA Marketing</p>	<p><u>TURN/NRDC protest to PG&E Advice Letter 7351-E, SCE Advice Letter 5358-E, and SDG&E Advice Letter 4492-E, September 3, 2024.</u></p>	<p>Verified</p>

<p>Education and Outreach (ME&O) communications. (TURN/NRDC protest, page 3)</p> <p>In response, PG&E “clarified its plan and provided a summary of its integrated campaign plans, including sample key messages and likely communications channels and tactics.” (Resolution E-5354, page 45, citing PG&E reply to protests, pages 21-22) The Commission relied on this additional information in adopting PG&E’s plan.</p> <p>Second, TURN/NRDC argued that PG&E’s ME&O plan should include customers potentially eligible for CARE/FERA but not already enrolled.</p> <p>PG&E agreed with TURN/NRDC that outreach plans “should prioritize segments, including HTR, low-income, and other customers who are deemed as priorities to receive information about the fixed charge.” The Commission found that PG&E’s proposed ME&O plan was reasonable as modified in the Resolution.</p> <p>Third, TURN/NRDC express concern at SCE’s proposed “IGFC Surcharge” of \$1.88/month per customer and noted that “it is unclear what costs the SCE surcharge</p>	<p><u>Resolution E-5354, pages 21-22, 52, 57.</u></p> <p><u>PG&E reply to Protests of Advice Letter 7351-E, September 10, 2025, page 23.</u></p> <p><u>TURN/NRDC protest to PG&E Advice Letter 7351-E, SCE Advice Letter 5358-E, and SDG&E Advice Letter 4492-E, September 3, 2024, page 3</u></p> <p><u>Resolution E-5354, pages 22, 52, 57.</u></p> <p><u>PG&E reply to Protests of Advice Letter 7351-E, September 10, 2025, page 23.</u></p> <p><u>TURN/NRDC protest to PG&E Advice Letter 7351-E, SCE Advice Letter 5358-E, and SDG&E Advice Letter 4492-E, September 3, 2024.</u></p>	
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<p>would be authorized to recover.” (page 4)</p> <p>The Commission ordered SCE to file a Tier 2 Advice Letter to provide additional details on the mechanism used for calculating this charge.</p> <p>Fourth, TURN/NRDC noted that, with respect to SDG&E’s “one-time change” to its volumetric distribution rate design methodology, “it is not clear how this change would affect rates for all residential schedules.” (page 6)</p> <p>TURN/NRDC urged the Commission to present the results of this approach for all rate schedules.</p> <p>The Commission found SDG&E’s approach to be reasonable but directed SDG&E to file a Tier 2 Advice Letter specifying the impacts of this change on “volumetric rate components of all residential tariffs.”</p>	<p><u>Resolution E-5356, page 20</u></p> <p><u>TURN/NRDC protest to PG&E Advice Letter 7351-E, SCE Advice Letter 5358-E, and SDG&E Advice Letter 4492-E, September 3, 2024.</u></p> <p><u>Resolution E-5355, page 30</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?	Y	Yes
b. Were there other parties to the proceeding with positions similar to yours?	Y	Yes
c. If so, provide name of other parties:		Noted

<p>Solar Energy Industries Association (SEIA), Center for Accessible Technology (CforAT).</p>	
<p>d. Intervenor’s claim of non-duplication:</p> <p>TURN was the only party that protested SDG&E’s first Advice Letter seeking to modify the CARE discount (AL 4572-E). TURN reached out to, and coordinated with, Cal Advocates on protests to the second Advice Letter (AL-4582-E). Because TURN was the only party that initially protested SDG&E’s proposed methodology, SDG&E’s methodology would likely have remained unchallenged absent TURN’s participation.</p> <p>TURN’s protest to the IGFC implementation Advice Letters was done jointly with the Natural Resources Defense Council (NRDC). TURN did the primary work on this protest, limiting any time on this effort by NRDC. While other parties filed protests to the IGFC implementation Advice Letters, the concerns raised by TURN/NRDC were unique and did not generally overlap with the issues raised by other parties. 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 and NRDC worked diligently to ensure that its involvement uniquely influenced the outcome of final Commission resolutions.</p>	<p>Noted</p>

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	<p>CPUC Discussion</p>
<p>a. Intervenor’s claim of cost reasonableness:</p> <p>As demonstrated in the substantial contribution section, TURN’s participation had an impact on the final proposals submitted by the three IOUs and the Commission’s approval of various Advice Letter filings, including:</p> <ul style="list-style-type: none"> • Preventing SDG&E from unilaterally reducing its average effective CARE discount from 35% to 32.5%. • Ensuring that IGFC ME&O plans focus on hard to reach customers and customers eligible for, but not already enrolled in, CARE or FERA. • Requiring SCE and SDG&E to file additional Advice Letters detailing several elements of their proposals and impacts on different rate schedules. 	<p>Noted</p>

	CPUC Discussion
<p>Given these specific and substantial contributions, the benefits associated with TURN’s participation far exceed the cost of TURN’s participation. TURN’s claim should be found to be reasonable.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>TURN devoted the minimum number of hours to reviewing the IOU Advice Letters, drafting protests, and communicating directly with the IOUs and Energy Division staff.</p> <p>Reasonableness of Staffing</p> <p><u>Matthew Freedman</u></p> <p>TURN’s lead attorney was Matthew Freedman. Mr. Freedman took the lead in drafting TURN’s protest to SDG&E AL 4572-E and 4582-E (CARE discount methodology). Mr. Freedman also reviewed and revised TURN’s protest to the IGFC implementation Advice Letters submitted by PG&E, SCE and SDG&E.</p> <p><u>Sylvie Ashford</u></p> <p>Sylvie Ashford served as an expert witness on behalf of TURN and NRDC in R.22-07-005. Ms. Ashford was the primary TURN staffer responsible for reviewing the IGFC implementation advice letters and drafting the protest. Ms. Ashford also assisted Mr. Freedman in responding to the SDG&E CARE discount proposal.</p> <p><u>Compensation Request</u></p> <p>TURN’s request also includes 6 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>Noted</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>IGFC Implementation (IMPLEMENT) – 28 hours – 75.68% of total</p>	<p>Noted, totals 100%</p>

	CPUC Discussion
<p>Review of PG&E, SCE and SDG&E IGFC implementation Advice Letters and drafting a single joint protest addressing Marketing, Education and Outreach issues, the recovery of implementation costs, and the assessment of rate impacts. This work included coordination with NRDC on the development of a joint combined protest to all three Advice Letters.</p> <p>SDG&E CARE discount methodology (SDGE-CARE) – 9 hours – 24.32% of total</p> <p>Review of SDG&E proposal to reduce its average effective CARE discount from 35% to 32.5%, drafting of protest to SDG&E Advice Letters, meeting with Energy Division staff to discuss TURN’s concerns, review of Commission suspension notices and final disposition letters.</p> <p>Compensation – 6 hours 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 \$
Matthe w Freedm an, TURN Staff Attorne y	2024	8.00	\$740	D.24-09-015	\$5,920.00	8.00	\$740 [1]	\$5,920.00
Matthe w Freedm an, TURN Staff	2025	3.25	\$805	D.25-05-018	\$2,616.25	3.25	\$795 [1]	\$2,583.75

CLAIMED						CPUC AWARD		
Attorney								
Sylvie Ashford, TURN Energy Policy Analyst	2024	24.50	\$245	D.25-06-030	\$6,002.50	22.50 [2]	\$245 [3]	\$5,512.50
Sylvie Ashford, TURN Energy Policy Analyst	2025	1.25	\$265	Res. ALJ-393, 2024 rate plus 3.5% COLA plus 5% step increase	\$331.25	1.25	\$265 [3]	\$331.25
Subtotal: \$14,870						Subtotal: \$14,347.50		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Matthew Freedman, TURN Staff Attorney	2025	6.00	\$402.5	50% of 2025 authorized rate	2,415.00	6.00	\$397.50 [1]	2,385.00
Subtotal: \$2,415.00						Subtotal: \$2,385.00		
TOTAL REQUEST: \$17,285.00						TOTAL AWARD: \$16,732.50		
<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>								

CLAIMED			CPUC AWARD
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ²	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Matthew Freedman	March 2001	214812	No

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

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Attorney and Experts Time Sheet Detail
3	TURN hours Allocated by Issue
4	<p>Sylvie Ashford Hourly Rate for 2025</p> <p>TURN requests that the Commission adopt a 2025 hourly rate of \$265 for TURN Energy Policy Analyst Sylvie Ashford. This rate is equal to the rate authorized by the Commission in D.25-06-030 for Ms. Ashford’s work in 2024 (\$245), adjusted by both the annual escalation methodology adopted in Resolution (Res.) ALJ-393 and the first 5% step increase for Ms. Ashford in the Public Policy Analyst – Level II experience tier.</p> <p>Res. ALJ-393 permits intervenor representatives to claim up to two 5% annual “step increases” within each labor role experience tier, as long as their final requested rate does not exceed the maximum approved rate for that experience level. (Res. ALJ-393, p. 5). The maximum approved rate for a Public Policy Analyst – Level II is \$348 for work conducted in 2025.</p>

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Matthew Freedman 2024, 2025	TURN requests an hourly rate of \$740 for work conducted by Matthew Freedman based on D.24-09-015 in 2024. D.24-09-015 established a 2024 rate of \$740 for Matthew Freedman therefore we adopt this approved rate for Matthew Freedman.

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 the final Decision.

Item	Reason																		
Hourly Rates & Intervenor Compensation Rate	<p>TURN requests an hourly rate of \$805 for work conducted by Matthew Freedman based on D.25-05-018 in 2025. However, the requested amount is over the maximum range for Legal – Attorney – V. D.25-10-059 established a 2025 rate of \$795 for Matthew Freedman therefore we adopt this approved rate for Matthew Freedman.</p> <p>As Intervenor Compensation Claim Preparation hours are compensated at ½ preparer’s normal hourly rate, we apply the rate of \$397.50 for Freedman in 2025.</p>																		
<p>[2] Reduction of hours for Sylvie Ashford</p>	<p><u>Excessive Hours</u></p> <p>Sylvie Ashford claimed a total of 8.25 hours between August 20 and August 21, 2024, for reading and analyzing the IGFC implementation advice letters submitted by PG&E, SCE, and SDG&E, as well as for follow-on analysis and comparison of those filings. While review of the utilities’ implementation proposals was necessary and contributed to TURN’s participation in the proceeding, the record reflects that these advice letters were highly similar in structure and content, as each utility was implementing the same Commission decision governing income-graduated fixed charges. Once Sylvie Ashford reviewed one or two of the implementation letters, some efficiencies would be expected in reviewing the remaining filings, particularly where the analytical framework, compliance questions, and core issues were largely overlapping. Although Sylvie Ashford’s analysis was helpful, the total number of hours claimed for this sequence of closely related review tasks is excessive relative to the reasonable amount of effort required. Excessive is when the Commission determines that the time claimed is disproportionate to the effort needed to make a substantial contribution, and the burden of proof rests with the intervenor to demonstrate that all hours claimed were spent productively. In this instance, TURN has not shown that the full amount of time claimed reflects reasonable efficiencies given the similarity of the advice letters.</p> <table border="1" data-bbox="418 1444 1276 1860"> <thead> <tr> <th data-bbox="418 1444 607 1486"><u>Date</u></th> <th data-bbox="610 1444 1130 1486"><u>Task</u></th> <th data-bbox="1133 1444 1276 1486"><u>Total</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="418 1491 607 1558">8/20/2024</td> <td data-bbox="610 1491 1130 1558">Read and analyze PG&E IGFC implementation letter</td> <td data-bbox="1133 1491 1276 1558">3.00</td> </tr> <tr> <td data-bbox="418 1562 607 1629">8/20/2024</td> <td data-bbox="610 1562 1130 1629">Read and analyze SCE IGFC implementation letter</td> <td data-bbox="1133 1562 1276 1629">1.25</td> </tr> <tr> <td data-bbox="418 1633 607 1701">8/20/2024</td> <td data-bbox="610 1633 1130 1701">Read and analyze SDG&E IGFC implementation letter</td> <td data-bbox="1133 1633 1276 1701">1.50</td> </tr> <tr> <td data-bbox="418 1705 607 1772">8/21/2024</td> <td data-bbox="610 1705 1130 1772">Identify concerns for ratepayers in IOU IGFC implementation plans</td> <td data-bbox="1133 1705 1276 1772">2.00</td> </tr> <tr> <td data-bbox="418 1776 607 1856">8/21/2024</td> <td data-bbox="610 1776 1130 1856">Compare implementation plans to IGFC decision requirements</td> <td data-bbox="1133 1776 1276 1856">0.50</td> </tr> </tbody> </table>	<u>Date</u>	<u>Task</u>	<u>Total</u>	8/20/2024	Read and analyze PG&E IGFC implementation letter	3.00	8/20/2024	Read and analyze SCE IGFC implementation letter	1.25	8/20/2024	Read and analyze SDG&E IGFC implementation letter	1.50	8/21/2024	Identify concerns for ratepayers in IOU IGFC implementation plans	2.00	8/21/2024	Compare implementation plans to IGFC decision requirements	0.50
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8/21/2024	Compare implementation plans to IGFC decision requirements	0.50																	

Item	Reason
	Accordingly, we reduce 2.00 hour from Sylvie Ashford’s claimed time in 2024 for inefficient and excessive hours from above.
<p>[3] Sylvie Ashford 2024 and 2025 Hourly Rates</p>	<p>TURN requests an hourly rate of \$245 for work conducted by Sylvie Ashford based on D.25-06-030 in 2024. D.25-06-030 established a 2024 rate of \$245 for Sylvie Ashford, therefore we adopt this approved rate in the role of Expert – Public Policy Analyst I for Ashford.</p> <p>TURN requests an hourly rate of \$265.00 for Ashford in 2025 in the role of Expert – Public Policy Analyst II. TURN also requests a first step increase applied to Ashford’s 2025 hourly rate in the role of Expert – Public Policy Analyst II.</p> <p>D.25-06-030 previously approved a 2024 rate of \$245.00 for Ashford in the role of Expert – Public Policy Analyst I. For Ashford’s 2025 hourly rate, the Commission applies the annual escalation methodology adopted in Resolution ALJ-393, which is a percent change of 3.46%, along with a 5% step increase, to Ashford’s 2024 rate of \$245.00 previously established. This results in a 2025 rate calculation of \$265.00, rounded to the nearest five dollars, and is applied here for Ashford in the role of Expert – Public Policy Analyst II.</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 (see Rule 14.6(c)(6))?	Yes

FINDINGS OF FACT

1. The Utility Reform Network has made a substantial contribution to Energy Division disposition of SDG&E Advice Letters 4572-E and 4582-E, Resolution E-5354, Resolution E-5355, and Resolution E-5356.
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 \$16,732.50.

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 \$16,732.50.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison Company, Bear Valley Electric Service, Inc., Liberty Utilities, and PacifiCorp shall pay The Utility Reform Network their respective shares of the award, based on their California-jurisdictional electric revenues for the 2024 calendar year, to reflect the year in which the proceeding was primarily litigated. If such data are unavailable, the most recent electric revenue data shall be used. 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 January 10, 2026, 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.

This decision is effective today.

Dated May 14, 2026, at San Francisco, California.

JOHN REYNOLDS
President
DARCIE L. HOUCK
KAREN DOUGLAS
Commissioners

Commissioners Matthew Baker and
Christine Harada recused themselves from
this agenda item and were not part of the
quorum in its consideration.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D2605029	Modifies Decision?	No
Contribution Decision(s):	Energy Division disposition of SDG&E Advice Letters 4572-E and 4582-E, Resolution E-5354, Resolution E-5355, and Resolution E-5356		
Proceeding(s):	R2207005		
Author:	ALJ Carolyn Sisto		
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Bear Valley Electric Service, Inc., Liberty Utilities, and PacifiCorp		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	10/27/25	\$17,285.00	\$16,732.50	N/A	See Part III D. CPUC Comments, Disallowances, and Adjustments

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Matthew	Freedman	Attorney	\$740	2024	\$740
Matthew	Freedman	Attorney	\$805	2025	\$795
Sylvie	Ashford	Expert	\$245	2024	\$245
Sylvie	Ashford	Expert	\$265	2025	\$265

(END OF APPENDIX)