

Decision **PROPOSED DECISION OF COMMISSIONER KAREN DOUGLAS**
(Mailed 4/27/2026)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Establish Policies, Processes, and Rules to Ensure Safe and Reliable Gas Systems in California and Perform Long-Term Gas System Planning.

Rulemaking 24-09-012

DECISION GRANTING COMPENSATION TO UTILITY CONSUMERS' ACTION NETWORK FOR SUBSTANTIAL CONTRIBUTION TO DECISION 25-07-016

Intervenor: Utility Consumers' Action Network	For contribution to Decision (D.) 25-07-016
Claimed: \$65,288.88	Awarded: \$23,305.13
Assigned Commissioner: Karen Douglas	Assigned ALJ: Andrew Dugowson ¹

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	<p>This decision (D.25-07-016) authorizes Pacific Gas and Electric Company, Southwest Gas Corporation, Southern California Gas Company, San Diego Gas & Electric Company, and small gas utilities to establish a memorandum account to record expenses related to complying with mapping activities per Public Utilities Code Section 661.</p> <p>In the related proceeding, R.20-01-007, a Decision there, D.24-09-34, provided that parties who commented on the Phase 3 Scope and Schedule due on March 13, 2024, participated in the March 19, 2024 prehearing conference, and commented on the Joint Agency Staff White Paper due on April 15, 2024 (collectively, Phase 3 Issues) may carry over the hours they incurred to the new rulemaking and make a single claim for intervenor compensation in that</p>
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¹ This proceeding was reassigned to ALJ Andrew Dugowson on March 10, 2026.

	<p>proceeding. And that Decision directed that Parties claiming intervenor compensation in the new rulemaking for hours incurred on the Phase 3 issues shall reference this decision and R.20-01-007 in their claim.</p> <p>(UCAN is including such claims in this ICOMP submission. See Part II: Substantial Contribution - Phase 3 Issues.)</p>
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812²:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	1/9/2025	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	2/10/2025	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.21-12-006	R.23-12-008. <i>See</i> Part I. C [1] CPUC Discussion.
6. Date of ALJ ruling:	May 27, 2022	June 18, 2025
7. Based on another CPUC determination (specify):	D.25-01-022 D.25-03-027 D.25-02-024 D.25-05-026 D.25-06-028 D.25-08-048 (see comment 1)	<i>See</i> Part I. C [1] CPUC Discussion.
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.21-12-006	R.23-12-008. <i>See</i> Part I. C [1] CPUC Discussion.
10. Date of ALJ ruling:	May 27, 2022	June 18, 2025
11. Based on another CPUC determination (specify):	D.25-01-022 D.25-03-027	<i>See</i> Part I. C [1] CPUC Discussion.

² All statutory references are to California Public Utilities Code unless indicated otherwise.

	Intervenor	CPUC Verification
	D.25-02-024 D.25-05-026 D.25-06-028 D.25-08-048 (see comment 1)	
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.25-07-016	Verified
14. Date of issuance of Final Order or Decision:	August 1, 2025	Verified
15. File date of compensation request:	September 30, 2025	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Intervenor’s Comment(s)	CPUC Discussion
1	After the ALJ ruling on UCAN’s significant financial hardship and customers status exceeded the one-year threshold, UCAN has requested a new ALJ ruling on each NOI it has filed.	Noted. While A.21-12-006 does show eligibility and significant financial hardship for UCAN, it is not within one year of R.23-12-008’s filing date. We therefore utilize the ruling issued in R.23-12-008 on June 18, 2025 to verify UCAN’s eligibility and significant financial hardship in this proceeding.

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>These are the UCAN documents referenced in UCAN’s contributions below:</p> <p><u>UCAN 1:</u> Comments on Phase 3 Scope, dated March 13, 2024 (R.20-01-007)</p> <p><u>UCAN 2:</u> Comments on Staff White Paper, dated April 15, 2024 (R.20-01-007)</p> <p><u>UCAN 3:</u> Comments on OIR, dated December 16, 2024</p> <p><u>UCAN 4:</u> Reply on OIR, dated January 3, 2025</p> <p><u>UCAN 5:</u> Comments on Cost Recovery, dated May 2, 2025</p> <p><u>UCAN 6:</u> Reply on Cost Recovery, dated May 9, 2025</p> <p><u>UCAN 7:</u> Comments on PD, dated July 14, 2025</p> <p><u>UCAN 8:</u> Reply on PD, dated July 21, 2025</p>		<p>Noted</p>

<p>Note: UCAN document “UCAN 3 and UCAN 4” are comments on the OIR and is coded as general participation.</p>		
<p>Issue: Phase 3 Issues (per D.24-09-034)</p>		<p>Noted</p>
<p>The Commission requested parties carry over hours from the prior Rulemaking for “Phase 3 Scope and Schedule.” R.24-09-012 is the new rulemaking in which the Assigned Commissioner has issued the scope and schedule.</p> <p>In accordance with D.24-09-034, UCAN requests compensation for the Phase 3 work in this first compensation request in R.24-09-012. UCAN’s work on scope and schedule contributed to the scoping of issues in R.24-09-012.</p> <p>Contributions on Scope and Schedule include: UCAN 1, all pages</p> <p>Comments on Staff Whitepaper include: UCAN 2, all pages</p>	<p>The Commission authorized parties to request intervenor compensation for specific work completed in the prior cycle of the instant proceeding.</p> <p>“Additionally, parties who commented on the Phase 3 Scope and Schedule due on March 13, 2024, participated in the March 19, 2024 prehearing conference, and commented on the Joint Agency Staff White Paper due on April 15, 2024 (collectively, Phase 3 Issues) may carry over the hours they incurred to the new rulemaking and make a single claim for intervenor compensation in that proceeding. Parties claiming intervenor compensation in the new rulemaking for hours incurred on the Phase 3 issues shall reference this decision and R.20-01-007 in their claim.” D.24-09-034, p. 19.</p>	<p>Noted. As stated in the IComp Program Guide at 4, “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.” <i>See</i> Part III D. [1-4] CPUC Comments, Disallowances, and Adjustments.</p>
<p>Issue: SB 1221 Memorandum Acct</p>		<p>Noted</p>
<p>UCAN acknowledged that the Commission will direct the gas utilities in some aspects of the mapping work. However, UCAN noted that the utilities are ultimately in control of costs because the utilities will make many decisions</p>	<p>In alignment with UCAN’s position, the Commission found that the IOUs have some control but not complete control.</p> <p>“The Commission finds that while some aspects of SB 1221 mapping have a degree of utility control, such as internal processes, data sourcing, and integration</p>	<p>Verified</p>

<p>independent of the Commission’s direction, including mapping processes, use of contractors, level of map completeness, and map accessibility. UCAN 5, p. 3.</p>	<p>with other mapping and database activities in their GRCs, the fundamental tasks required of the gas utilities are directed by statute and the Commission. We, therefore, find that the gas utilities lack sufficient control of SB 1221 mapping costs.” D.25-07-016, p. 9.</p>	
<p>UCAN collected and provided to the Commission information regarding the ability of the IOUs to have included gas pipeline mapping and planning in their prior GRCs. UCAN also noted that the last cycle of the instant proceeding included planning and mapping activities in its scope. These data were only provided by UCAN. UCAN 05, p. 3. UCAN 06, pp. 3-4.</p>	<p>UCAN’s contribution enriched the proceeding’s record, and the data was used by the Commission in its decision. “Though the gas utilities have been involved in long-term gas planning both in this proceeding and in its predecessor proceeding (R.20-01-007), the issue here is the mapping requirements of SB 1221. This issue was not present in R.20-01-007, nor was it included in the initial scope shown in the OIR for this proceeding. It was first included in the Scoping Memo issued on January 31, 2025.” D.25-07-016, p. 12.</p>	Verified
<p>In response to the Commission’s question, UCAN noted that the costs for SB 1221 mapping would be incurred before the IOUs’ next GRCs. UCAN 05, p. 4.</p>	<p>The Commission agreed with UCAN. “The Commission agrees with all parties and finds that costs will be incurred prior to the resolution of gas utilities’ next GRC applications.” D.25-07-016, p. 13.</p>	Verified
<p>Regarding mapping cost estimates and whether costs incurred by the utilities would be substantial, UCAN provided the Commission with several data points to consider. UCAN highlighted that the IOUs’ claims lacked supporting documentation or specificity. Of particular note, UCAN supplied the Commission with data responses by the IOUs from other proceeding in which the IOUs admitted that their</p>	<p>The Commission agreed with UCAN that the IOUs’ unsupported cost assertions. “We agree with parties that it is currently unclear if the costs gas utilities may incur as a result of their SB 1221 mapping work will be substantial.” D.25-07-016, p. 17.</p>	Verified

<p>generalized, high-cost estimates (i.e., “immensely costly”) were unsupported with either data or calculations. UCAN noted that the generalized assertions in the instant proceeding mirrored the assertions that the IOUs have made previously. UCAN 05, p. 4-5. UCAN 05, Attachment 1 UCAN 05, Attachment 2 UCAN 05, Attachment 3</p>		
<p>UCAN requested that the Commission require the IOUs to adhere the Prudent Manager Standard. UCAN 07, p. 5-6.</p>	<p>At UCAN’s request, the Commission updated the PD and included the reference to the Prudent Manager Standard in D.25-07-016.</p> <p>“UCAN also requests the proposed decision explicitly highlight the importance of the Prudent Manager Standard... We highlight the importance of the Prudent Manager Standard per D.18-07-025.” D.25-07-016, p. 23-24.</p> <p>“In a utility’s request for cost recovery of funds spent on SB 1221 mapping activities, we require the applicant to demonstrate and quantify how it adhered to the Prudent Manager Standard.” D.25-07-016, p. 18.</p>	<p>Verified</p>
<p>UCAN requested the PD be clarified regarding the specifics of incremental cost recording that is allowed in the memorandum accounts. UCAN 08, p. 2.</p>	<p>The Commission stated: “UCAN agrees with comments from IS-AECA regarding comments clarifying incremental costs.” D.25-07-016, p. 25.</p> <p>In alignment with UCAN’s request, the Commission updated the PD to state that it would: “...provide further clarification that the memorandum accounts are</p>	<p>Verified</p>

	only to record SB 1221 mapping costs per Pub. Util. Code 661.” D.25-07-016, p. 23.	
UCAN supported SCE’s request that it be allowed to use its CETMA for cost tracking to save ratepayer costs. UCAN 08, p. 1-2.	The Commission updated the PD in alignment with UCAN’s comments. “We recognize that D.25-06-010 authorizes SCE to record in its CETMA SB 1221 mapping activities per Pub. Util. Code 661. SCE is not required to establish a new memorandum account and may use its CETMA for this purpose.” D.25-07-016, p. 23.	Verified

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

	Intervenor’s Assertion	CPUC Discussion
a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: TURN		Noted
d. Intervenor’s claim of non-duplication: UCAN is the only consumer advocate representing the interests of San Diego Gas and Electric residential ratepayers that provided comments to the Commission on the memorandum account issue covered in this compensation request (the other intervenors are in the Bay Area). In this proceeding UCAN has made several unique contributions. For example, UCAN provided unique information to the Commission in Attachments 1-3 to its May 2, 2025 comments which shared with the Commission previous examples of the IOUs asserting substantial costs without supporting calculations or analysis. It was also specifically on UCAN’s recommendation that the PD was updated to reference the Prudent Manager Standard. UCAN coordinates with other intervenors whenever possible. This coordination enables UCAN and other parties to minimize duplicative work and analyses. The Commission should find that UCAN’s participation was efficiently coordinated with the participation of other intervenors to avoid		Noted

<p>undue duplication and to ensure that, to the extent duplication occurred, it served to supplement, complement, or contribute to the showing of the other intervenor. And consistent with such a finding, the Commission should determine that UCAN’s work is compensable consistent with the conditions set forth in Section 1802.5.</p>	
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PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
<p>a. Intervenor’s claim of cost reasonableness: UCAN used a single attorney and a single expert in this proceeding. In doing so, UCAN was able to minimize coordination and maximize its ability to efficiently address the issues within the proceeding. While the dollar amount of UCAN’s contributions are difficult to quantify because the memorandum account will be evaluated in the future. UCAN successfully argued against a balancing account which would have shifted all risks onto ratepayers.</p>	<p>Noted</p>
<p>b. Reasonableness of hours claimed: UCAN only researched and commented on issues on which the Commission requested feedback. UCAN further restricted itself to sub-issues that are within its expertise and that affect residential customers. UCAN spent the minimum number of hours needed to address the issues in the proceeding.</p>	<p>Noted</p>
<p>c. Allocation of hours by issue: 39%, Issue 1: Phase 3 issues (per D.24-09-034) 27%, Issue 2: SB 1221 Memorandum Acct 34%, Issue 3: General Participation Note: Typically, UCAN’s General Participation allocation percentage is in the low single digits. However, because this is the first compensation claim in R.24-09-012, the claim includes time for OIR review, OIR comments, and PHC participation in addition to typical items for the GP category such as workshop participation and comments.</p>	<p>Noted</p>

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Edward Lopez	2024	11.25	\$475	D.25-06-028	\$5,343.75	0.00 [1]	\$475.00	\$0.00
Edward Lopez	2025	16.25	\$485	D.25-06-028 rate w CPUC escalation (see comment #1)	\$7,881.25	15.00 [2]	\$485.00 [5]	\$7,275.00
Tyson Siegele (Expert)	2024	96.3	\$345	D.25-03-028	\$33,223.50	0.00 [3]	N/A [6,8]	\$0.00
Tyson Siegele (Expert)	2025	45.8	\$360	D.25-03-028 rate w CPUC escalation (see comment #2)	\$16,488	38.60 [4]	\$355.00 [6,8]	\$13,703.00
Subtotal: \$62,936.50						Subtotal: \$20,978.00		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Edward Lopez	2025	1.75	\$245 ³	½ 2025 rate	\$424.38	1.75	\$242.50 [5]	\$424.38
Tyson Siegele	2025	10.1	\$180	½ 2025 rate	\$1,818.00	10.10	\$177.50 [6,8]	\$1,792.75
Courtney Cook-Sloan	2025	1	\$110	½ 2025 rate	\$110.00	1.00	\$110.00 [7]	\$110.00
Subtotal: \$2,352.38						Subtotal: \$2,327.13		
TOTAL REQUEST: \$65,288.88						TOTAL AWARD: \$23,305.13		
*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								

³ Typographic error. UCAN listed Edward Lopez's 2025 intervenor compensation preparation rate as \$242.50 not \$245.00 in their timesheets. The total request is correct.

CLAIMED		CPUC AWARD	
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 ½ of preparer’s normal hourly rate			
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ⁴	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Edward Lopez	12/20/1991	157052	No

C. Attachments Documenting Specific Claim and Comments on Part III:⁵

Attachment or Comment #	Description/Comment
Attachment #1	Certificate of Service
Attachment #2	Agreement between UCAN and UCAN’s consultant Mr. Siegele.
Comment #1 Rate Escalation Request for Edward Lopez	<p>2025: UCAN requests a 2025 rate for Mr. Lopez of \$485.</p> <p>This rate is derived by applying the proper escalation rate of 3.46% for 2025, as published by the Commission in the 2025 version of the hourly rate chart for intervenor compensation (see https://www.cpuc.ca.gov/-/media/cpucwebsite/divisions/administrative-law-judge-division/documents/icompmaterials/hourlyratechart-02132025.xlsm).</p> <p>The resulting 2025 rate is \$491.44 rounded up to the nearest \$5, equals \$495. [\$475 x 1.0346 = \$491.44 rounded up to the nearest \$5 increment = \$495].</p> <p>The CPUC approved rate category for Mr. Lopez is “Advocate – Executive Director – V.” Because rate for the category is capped at \$488 for 2025, UCAN requests the highest \$5 increment within the rate category of \$485 instead of the calculated escalation of \$495.</p>
Comment #2 Tyson Siegle	<p>2024: CPUC-approved rate for Mr. Siegele, \$345 in D.25-03-028 (https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M559/K848/559848673.PDF)</p> <p>2025: UCAN requests a 2025 rate for Mr. Siegele of \$360.</p>

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

⁵ Attachments not attached to final Decision.

Attachment or Comment #	Description/Comment
(Expert) Rate Justification	<p>This rate is derived by applying the proper escalation rate of 3.46% for 2025, as published by the Commission in the 2025 version of the hourly rate chart for intervenor compensation (see https://www.cpuc.ca.gov/-/media/cpucwebsite/divisions/administrative-law-judge-division/documents/icompmaterials/hourlyratechart-02132025.xlsm).</p> <p>The resulting 2025 rate is \$357 rounded up to the nearest \$5, equals \$360. [\$345 x 1.0346 = \$357 rounded up to the nearest \$5 increment = \$360]. The CPUC-approved rate category for Mr. Siegele is “Expert – Not Otherwise Classified – V” (D.25-03-028). The requested rate of \$360 remains within the 2025 range for this category.</p> <p>Note: Mr. Siegele is a consultant to UCAN. The agreement between Mr. Siegele and UCAN is Attachment #2.</p>
Comment Courtney Cook-Sloan #3 Rate Justification	<p>2025: UCAN requests a COLA rate increase for Courtney Cook-Sloan for the years 2025. Ms. Cook-Sloan’s rate in 2024 was established in D.25-02-024 at \$215. UCAN requests Ms. Cook-Sloan’s rate for 2025 to be increased to \$220 based on the 3.46% COLA increase.</p> <p>[\$215 x 1.0346 = \$222.44 rounded up to the nearest \$5 increment = \$220]. This COLA increase percentages come from the Market Research Study’s excel spreadsheet.</p>

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Reduction of 2024 Hours for Edward Lopez	<p>The IComp Program Guide at 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."</p> <p>This claim only seeks compensation for work related to D.25-07-016. Therefore, UCAN’s timesheets for Phase 3 Issues, Staff White Paper, and the OIR are disallowed without prejudice. The hours related to these issues are denied in this claim because D.25-07-016 does not resolve any Phase 3 issues. Hours related to Phase 3 Issues, Staff White Paper, and the OIR may be considered in Rulemaking 24-09-012 if the hours contribute to the resolution of the issue. Thus, UCAN can still seek compensation for these hours when the forthcoming decision addressing Phase 3 is issued.</p>

Item	Reason																																																																
	<p>Accordingly, we reduce 11.25 hours from Edward Lopez’s 2024 hours for time associated with the following entries:</p> <table border="1" data-bbox="418 327 1360 1457"> <thead> <tr> <th data-bbox="418 327 591 369">Date</th> <th data-bbox="591 327 1149 369">Notes</th> <th data-bbox="1149 327 1255 369">Issues</th> <th data-bbox="1255 327 1360 369">Hours</th> </tr> </thead> <tbody> <tr> <td data-bbox="418 369 591 411">3/19/2024</td> <td data-bbox="591 369 1149 411">Attending PHC</td> <td data-bbox="1149 369 1255 411">1</td> <td data-bbox="1255 369 1360 411">1.00</td> </tr> <tr> <td data-bbox="418 411 591 495">4/8/2024</td> <td data-bbox="591 411 1149 495">Edit & Revise Draft Comments on White Paper</td> <td data-bbox="1149 411 1255 495">1</td> <td data-bbox="1255 411 1360 495">1.25</td> </tr> <tr> <td data-bbox="418 495 591 642">4/9/2024</td> <td data-bbox="591 495 1149 642">Communicate w/ Experts re: Revised Draft Comments, Directions on next round of review/edits, Request final draft for filing</td> <td data-bbox="1149 495 1255 642">1</td> <td data-bbox="1255 495 1360 642">0.25</td> </tr> <tr> <td data-bbox="418 642 591 684">4/15/2024</td> <td data-bbox="591 642 1149 684">Finalize Comments on White Paper</td> <td data-bbox="1149 642 1255 684">1</td> <td data-bbox="1255 642 1360 684">1.00</td> </tr> <tr> <td data-bbox="418 684 591 726">7/15/2024</td> <td data-bbox="591 684 1149 726">Review OIR</td> <td data-bbox="1149 684 1255 726">3</td> <td data-bbox="1255 684 1360 726">1.50</td> </tr> <tr> <td data-bbox="418 726 591 842">10/24/2024</td> <td data-bbox="591 726 1149 842">Review OIR & White Paper; Communicate w/ Expert re: UCAN Issues</td> <td data-bbox="1149 726 1255 842">3</td> <td data-bbox="1255 726 1360 842">1.00</td> </tr> <tr> <td data-bbox="418 842 591 926">10/24/2024</td> <td data-bbox="591 842 1149 926">Communicate w/ Expert re: UCAN Issues - White Paper</td> <td data-bbox="1149 842 1255 926">3</td> <td data-bbox="1255 842 1360 926">0.25</td> </tr> <tr> <td data-bbox="418 926 591 1041">11/12/2024</td> <td data-bbox="591 926 1149 1041">Review ALJ Email Ruling re: Scheduling PHC & Updating Scope & Categorization</td> <td data-bbox="1149 926 1255 1041">3</td> <td data-bbox="1255 926 1360 1041">0.25</td> </tr> <tr> <td data-bbox="418 1041 591 1083">11/12/2024</td> <td data-bbox="591 1041 1149 1083">Communicate w/ Expert re: PHC Issues</td> <td data-bbox="1149 1041 1255 1083">3</td> <td data-bbox="1255 1041 1360 1083">0.25</td> </tr> <tr> <td data-bbox="418 1083 591 1167">12/7/2024</td> <td data-bbox="591 1083 1149 1167">Email w/ Expert re: Reply Comments to Parties' OIR Comments</td> <td data-bbox="1149 1083 1255 1167">3</td> <td data-bbox="1255 1083 1360 1167">0.25</td> </tr> <tr> <td data-bbox="418 1167 591 1209">12/12/2024</td> <td data-bbox="591 1167 1149 1209">Outline and Draft OIR Comments</td> <td data-bbox="1149 1167 1255 1209">3</td> <td data-bbox="1255 1167 1360 1209">1.00</td> </tr> <tr> <td data-bbox="418 1209 591 1251">12/16/2024</td> <td data-bbox="591 1209 1149 1251">Revise OIR Comments</td> <td data-bbox="1149 1209 1255 1251">3</td> <td data-bbox="1255 1209 1360 1251">1.50</td> </tr> <tr> <td data-bbox="418 1251 591 1293">12/17/2024</td> <td data-bbox="591 1251 1149 1293">Review Parties' Comments on the OIR</td> <td data-bbox="1149 1251 1255 1293">3</td> <td data-bbox="1255 1251 1360 1293">0.25</td> </tr> <tr> <td data-bbox="418 1293 591 1377">12/23/2024</td> <td data-bbox="591 1293 1149 1377">Zoom Call w/ Expert re: OIR Reply Comments</td> <td data-bbox="1149 1293 1255 1377">3</td> <td data-bbox="1255 1293 1360 1377">0.50</td> </tr> <tr> <td data-bbox="418 1377 591 1457">12/30/2024</td> <td data-bbox="591 1377 1149 1457">Outline & Draft Reply to OIR Comments</td> <td data-bbox="1149 1377 1255 1457">3</td> <td data-bbox="1255 1377 1360 1457">1.00</td> </tr> </tbody> </table>	Date	Notes	Issues	Hours	3/19/2024	Attending PHC	1	1.00	4/8/2024	Edit & Revise Draft Comments on White Paper	1	1.25	4/9/2024	Communicate w/ Experts re: Revised Draft Comments, Directions on next round of review/edits, Request final draft for filing	1	0.25	4/15/2024	Finalize Comments on White Paper	1	1.00	7/15/2024	Review OIR	3	1.50	10/24/2024	Review OIR & White Paper; Communicate w/ Expert re: UCAN Issues	3	1.00	10/24/2024	Communicate w/ Expert re: UCAN Issues - White Paper	3	0.25	11/12/2024	Review ALJ Email Ruling re: Scheduling PHC & Updating Scope & Categorization	3	0.25	11/12/2024	Communicate w/ Expert re: PHC Issues	3	0.25	12/7/2024	Email w/ Expert re: Reply Comments to Parties' OIR Comments	3	0.25	12/12/2024	Outline and Draft OIR Comments	3	1.00	12/16/2024	Revise OIR Comments	3	1.50	12/17/2024	Review Parties' Comments on the OIR	3	0.25	12/23/2024	Zoom Call w/ Expert re: OIR Reply Comments	3	0.50	12/30/2024	Outline & Draft Reply to OIR Comments	3	1.00
Date	Notes	Issues	Hours																																																														
3/19/2024	Attending PHC	1	1.00																																																														
4/8/2024	Edit & Revise Draft Comments on White Paper	1	1.25																																																														
4/9/2024	Communicate w/ Experts re: Revised Draft Comments, Directions on next round of review/edits, Request final draft for filing	1	0.25																																																														
4/15/2024	Finalize Comments on White Paper	1	1.00																																																														
7/15/2024	Review OIR	3	1.50																																																														
10/24/2024	Review OIR & White Paper; Communicate w/ Expert re: UCAN Issues	3	1.00																																																														
10/24/2024	Communicate w/ Expert re: UCAN Issues - White Paper	3	0.25																																																														
11/12/2024	Review ALJ Email Ruling re: Scheduling PHC & Updating Scope & Categorization	3	0.25																																																														
11/12/2024	Communicate w/ Expert re: PHC Issues	3	0.25																																																														
12/7/2024	Email w/ Expert re: Reply Comments to Parties' OIR Comments	3	0.25																																																														
12/12/2024	Outline and Draft OIR Comments	3	1.00																																																														
12/16/2024	Revise OIR Comments	3	1.50																																																														
12/17/2024	Review Parties' Comments on the OIR	3	0.25																																																														
12/23/2024	Zoom Call w/ Expert re: OIR Reply Comments	3	0.50																																																														
12/30/2024	Outline & Draft Reply to OIR Comments	3	1.00																																																														
<p>[2] Reduction of 2025 Hours for Edward Lopez</p>	<p>The IComp Program Guide at 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 related to D.25-07-016. Therefore, UCAN’s timesheets for Phase 3 Issues, Staff White Paper, and the OIR are disallowed without prejudice. The hours related to these issues are denied in this claim because D.25-07-016 does not resolve any Phase 3 issues. Hours related to Phase 3 Issues, Staff White Paper, and the OIR may be considered in Rulemaking 24-09-012 if the hours contribute to the resolution</p>																																																																

Item	Reason																																												
	<p>of the issue. Thus, UCAN can still seek compensation for these hours when the forthcoming decision addressing Phase 3 is issued.</p> <p>Accordingly, we reduce 1.25 hours from Edward Lopez’s 2025 hours for time associated with the following entries:</p> <table border="1" data-bbox="418 436 1360 638"> <thead> <tr> <th>Date</th> <th>Notes</th> <th>Issues</th> <th>Hours</th> </tr> </thead> <tbody> <tr> <td>1/3/2025</td> <td>Revise & Finalize Reply Comments to OIR</td> <td>3</td> <td>1</td> </tr> <tr> <td>1/3/2025</td> <td>Communicate w/ Expert re: Revisions & Finalize Reply Comments to OIR</td> <td>3</td> <td>0.25</td> </tr> </tbody> </table>	Date	Notes	Issues	Hours	1/3/2025	Revise & Finalize Reply Comments to OIR	3	1	1/3/2025	Communicate w/ Expert re: Revisions & Finalize Reply Comments to OIR	3	0.25																																
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<p>[3] Reduction of 2024 Hours for Tyson Siegele</p>	<p>The IComp Program Guide at 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 related to D.25-07-016. Therefore, UCAN’s timesheets for Phase 3 Issues, Staff White Paper, and the OIR are disallowed without prejudice. The hours related to these issues are denied in this claim because D.25-07-016 does not resolve any Phase 3 issues. Hours related to Phase 3 Issues, Staff White Paper, and the OIR may be considered in Rulemaking 24-09-012 if the hours contribute to the resolution of the issue. Thus, UCAN can still seek compensation for these hours when the forthcoming decision addressing Phase 3 is issued.</p> <p>Accordingly, we reduce 96.30 hours from Tyson Siegele’s 2024 hours for time associated with the following entries:</p> <table border="1" data-bbox="418 1205 1386 1877"> <thead> <tr> <th>Date</th> <th>Notes</th> <th>Issues</th> <th>Hours</th> </tr> </thead> <tbody> <tr> <td>2/27/2024</td> <td>review ruling</td> <td>1</td> <td>0.80</td> </tr> <tr> <td>2/28/2024</td> <td>review whitepaper</td> <td>1</td> <td>3.40</td> </tr> <tr> <td>2/29/2024</td> <td>research near-term options for gas use/infrastructure reductions</td> <td>1</td> <td>2.80</td> </tr> <tr> <td>3/4/2024</td> <td>research near-term options for gas use/infrastructure reductions</td> <td>1</td> <td>2.10</td> </tr> <tr> <td>3/8/2024</td> <td>Draft Ruling comments</td> <td>1</td> <td>0.80</td> </tr> <tr> <td>3/11/2024</td> <td>Draft Ruling comments</td> <td>1</td> <td>4.50</td> </tr> <tr> <td>3/12/2024</td> <td>Draft Ruling comments</td> <td>1</td> <td>5.70</td> </tr> <tr> <td>3/17/2024</td> <td>research opportunities regarding gas reductions for whitepaper cmts</td> <td>1</td> <td>1.50</td> </tr> <tr> <td>3/18/2024</td> <td>research opportunities regarding gas reductions for whitepaper cmts</td> <td>1</td> <td>2.10</td> </tr> <tr> <td>3/22/2024</td> <td>research opportunities regarding gas reductions for whitepaper cmts</td> <td>1</td> <td>3.20</td> </tr> </tbody> </table>	Date	Notes	Issues	Hours	2/27/2024	review ruling	1	0.80	2/28/2024	review whitepaper	1	3.40	2/29/2024	research near-term options for gas use/infrastructure reductions	1	2.80	3/4/2024	research near-term options for gas use/infrastructure reductions	1	2.10	3/8/2024	Draft Ruling comments	1	0.80	3/11/2024	Draft Ruling comments	1	4.50	3/12/2024	Draft Ruling comments	1	5.70	3/17/2024	research opportunities regarding gas reductions for whitepaper cmts	1	1.50	3/18/2024	research opportunities regarding gas reductions for whitepaper cmts	1	2.10	3/22/2024	research opportunities regarding gas reductions for whitepaper cmts	1	3.20
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Item	Reason			
	3/24/2024	research opportunities regarding gas reductions for whitepaper cmts	1	2.00
	3/25/2024	research opportunities regarding gas reductions for whitepaper cmts	1	2.10
	3/28/2024	research opportunities regarding gas reductions for whitepaper cmts	1	2.60
	3/28/2024	review of claims made by parties in the PHC in comparison to info in whitepaper	1	0.60
	3/29/2024	research linear generators for whitepaper cmts	1	0.50
	3/29/2024	research opportunities regarding gas reductions for whitepaper cmts	1	0.90
	3/29/2024	research opportunities regarding gas reductions for whitepaper cmts	1	0.70
	3/31/2024	research opportunities regarding gas reductions for whitepaper cmts	1	2.20
	4/1/2024	write comments on White Paper	1	7.50
	4/2/2024	write comments on White Paper	1	4.40
	4/3/2024	write comments on White Paper	1	5.00
	4/4/2024	write comments on White Paper	1	3.40
	4/11/2024	write comments on White Paper	1	0.50
	4/12/2024	review and finalize White Paper comments	1	2.30
	4/12/2024	coordination w/ parties	1	1.10
	4/15/2024	review and finalize White Paper comments	1	0.50
	10/24/2024	GasSys: research for OIR comments	3	1.10
	10/30/2024	GasSys: research for OIR comments	3	1.80
	10/31/2024	GasSys: research for OIR comments	3	1.50
	11/4/2024	GasSys: research for OIR comments	3	4.50
	11/8/2024	GasSys: research for OIR comments	3	0.90
	11/13/2024	GasSys: research scope recommendations for OIR	3	0.40
	11/14/2024	GasSys: research CEC gas projections and data availability in preparation for workshop	3	1.20
	11/14/2024	GasSys: participate in workshop	3	1.90
	12/13/2024	Research for OIR comments	3	4.00
	12/15/2024	Research for OIR comments	3	3.20
	12/16/2024	Write comments on OIR	3	6.30
	12/19/2024	review comments on OIR	3	0.70

Item	Reason															
	12/30/2024	review parties OIR comments	3	1.40												
	12/31/2024	write reply to OIR comments	3	4.20												
<p>[4] Reduction of 2025 Hours for Tyson Siegele</p>	<p>The IComp Program Guide at 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 related to D.25-07-016. Therefore, UCAN’s timesheets for Phase 3 Issues, Staff White Paper, and the OIR are disallowed without prejudice. The hours related to these issues are denied in this claim because D.25-07-016 does not resolve any Phase 3 issues. Hours related to Phase 3 Issues, Staff White Paper, and the OIR may be considered in Rulemaking 24-09-012 if the hours contribute to the resolution of the issue. Thus, UCAN can still seek compensation for these hours when the forthcoming decision addressing Phase 3 is issued.</p> <p>Accordingly, we reduce 7.20 hours from Tyson Siegele’s 2025 hours for time associated with the following entries.</p> <table border="1" data-bbox="418 905 1365 1035"> <thead> <tr> <th>Date</th> <th>Notes</th> <th>Issues</th> <th>Hours</th> </tr> </thead> <tbody> <tr> <td>1/2/2025</td> <td>write reply to OIR comments</td> <td>3</td> <td>6.8</td> </tr> <tr> <td>1/3/2025</td> <td>write reply to OIR comments</td> <td>3</td> <td>0.4</td> </tr> </tbody> </table>				Date	Notes	Issues	Hours	1/2/2025	write reply to OIR comments	3	6.8	1/3/2025	write reply to OIR comments	3	0.4
Date	Notes	Issues	Hours													
1/2/2025	write reply to OIR comments	3	6.8													
1/3/2025	write reply to OIR comments	3	0.4													
<p>[5] Edward Lopez 2025 Hourly Rate and 2025 Intervenor Compensation (IComp) Preparation Rate</p>	<p>D.25-06-028 verified a 2024 rate of \$475.00 for Edward Lopez as an Advocate – Executive Director – V. To the 2024 rate of \$475.00, we apply the 2025 annual escalation factor of 3.46%. The maximum of the Executive Director V 2025 range is \$488.27, rounded down to the nearest \$5.00 yields a 2025 rate of \$485.00. We find this rate reasonable and adopt it here. We take ½ of Lopez’s 2025 rate for an IComp preparation rate of \$242.50.</p>															
<p>[6] Tyson Siegele’s 2024, 2025 Hourly Rates and 2025 Intervenor Compensation (IComp) Preparation Rate</p>	<p>UCAN has confirmed that Tyson Siegele is a consultant. Pursuant to Commission policy, the rate requested by an intervenor must not exceed the rate billed to that intervenor by any outside consultant it hires, even if the consultant’s billed rate is below the floor for a given experience level.⁶ Per the IComp Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§ 1804(d)).</p> <p>UCAN has confirmed that per the terms of their contract, Tyson Siegele has been hired on a contingency rate basis, meaning that Tyson Siegele has agreed</p>															

⁶ D.07-01-009, D.08-04-010, and ALJ Resolution ALJ 235.

Item	Reason
	<p>to defer the consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on Tyson Siegele’s experience as an Expert – Not Otherwise Classified - V.</p> <p>As noted in Part III.D.[3] above, no 2024 hours are awarded, we therefore do not determine a 2024 rate for Siegele at this time.</p> <p>Given that the 2025 rate range for Expert – Not Otherwise Classified - V is \$264.22 to \$401.60, we find a 2025 hourly rate of \$355.00 to be reasonable and we adopt it here. We take ½ of Siegele’s 2025 rate for an IComp preparation rate of \$177.50.</p> <p>The award determined herein for Tyson Siegele’s contribution in this proceeding shall be paid in full to Tyson Siegele, and no portion of this part of the award shall be kept by UCAN. 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>[7] Courtney Cook-Sloan’s 2025 Intervenor Compensation (IComp) Preparation Rate</p>	<p>At the time of filing, Courtney Cook-Sloan has 5+ years of experience and therefore qualifies as a Legal – Paralegal Manager III (5-10 years of experience) with a 2025 rate range of \$192.32 to \$314.88. Based on relevant experience, we find a 2025 hourly rate of \$220.00 to be reasonable and adopt it here. We take ½ of Cook-Sloan’s 2025 rate for an IComp preparation rate of \$110.00.</p>
<p>[8] Contingency Rate Disclaimer</p>	<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>

Item	Reason
	The Commission has clear authority to audit intervenors' books and records to verify the basis for any award. Intervenors must therefore ensure full transparency regarding actual time spent on issues, consultant fees, payment arrangements, and the actual disbursement of funds. Failure to meet this obligation undermines the integrity of the compensation process and may lead to denial of claims or further enforcement action.

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
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B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?	No
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If not:

Party	Comment	CPUC Discussion
	No comments filed.	

FINDINGS OF FACT

1. Utility Consumers’ Action Network has made a substantial contribution to D.25-07-016.
2. The requested hourly rates for Utility Consumers’ Action 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, and/or reflect the actual rates billed to, and paid by the intervenor, for consultant services rendered.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$23,305.13.

CONCLUSION OF LAW

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

ORDER

1. Utility Consumers' Action Network is awarded \$23,305.13.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Gas Company, and Southwest Gas Corporation shall pay Utility Consumers' Action Network their respective shares of the award, based on their California-jurisdictional gas revenues for the 2025 calendar year, to reflect the year in which the proceeding was primarily litigated. If such data is unavailable, the most recent gas 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 December 14, 2025, the 75th day after the filing of Utility Consumers' Action Network's request, and continuing until full payment is made.
3. The comment period for today's decision is not waived.

This decision is effective today.

Dated _____, at Sacramento, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D2507016		
Proceeding(s):	R2409012		
Author:	ALJ Andrew Dugowson		
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Gas Company, and Southwest Gas Corporation		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Utility Consumers' Action Network	September 30, 2025	\$65,288.88	\$23,305.13	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
Edward	Lopez	Attorney	\$475	2024	\$475.00
Edward	Lopez	Attorney	\$485	2025	\$485.00
Tyson	Siegele	Expert ⁷	\$345	2024	N/A ⁸
Tyson	Siegele	Expert ⁷	\$360	2025	\$355.00
Courtney	Cook-Sloan	Paralegal ⁹	\$220	2025	\$220.00

(END OF APPENDIX)

⁷ Tyson Siegele serves as a consultant to UCAN.

⁸ 2024 hours were not awarded for Siegele, we therefore do not adopt a 2024 hourly rate.

⁹ Courtney Cook-Sloan is a Paralegal Manager III in 2025.