

Decision 26-06-027 June 11, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Update and Amend
Commission General Order 131-D.

Rulemaking 23-05-018
(Filed May 18, 2023)

**DECISION GRANTING COMPENSATION TO PROTECT OUR COMMUNITIES
FOUNDATION FOR SUBSTANTIAL CONTRIBUTION TO DECISIONS (D.) 23-12-035,
D.24-06-026, D.25-01-055 AND D.25-07-042**

Intervenor: The Protect Our Communities Foundation	For contribution to Decision (D.) 23-12-035, D.24-06-026, D.25-01-055, D.25-07-042
Claimed: \$182,820.75	Awarded: \$169,290.00
Assigned Commissioner: Karen Douglas	Assigned ALJ: Zhen Zhang

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.23-12-035 adopted limited modifications to General Order 131-D in light of Senate Bill 529; D.24-06-026 denied PCF’s application for rehearing of D.23-12-035 and clarified the Commission’s intent regarding the in lieu of language; D.25-01-055 adopted General Order (GO) 131-E and adopted revisions to GO-131-D; D.25-07-042 denied rehearing of D.25-01-055 and provided important clarifications with respect to the language adopted in D.25-01-055.
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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:	N/A	
2. Other specified date for NOI:	Within 30 days of July 31, 2023 as authorized by the	Verified. Scoping Ruling issued July 31, 2023 at page 9

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

	Scoping Memo and Ruling.	states “a customer who intends to seek an award of compensation must file and serve a notice of intent to claim compensation within 30 days after the issuance of this scoping memo.”
3. Date NOI filed:	8/30/2025	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:	R.18-12-005	R.22-11-013
6. Date of ALJ ruling:	4/27/2020	6/15/2023
7. Based on another CPUC determination (specify):	D.20-04-017	D.25-04-017 affirms 6/15/2023 ruling in R.22-11-013
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:	R.22-11-013	Verified
10. Date of ALJ ruling:	6/15/2023	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.25-07-042	Verified
14. Date of issuance of Final Order or Decision:	July 25, 2025	Verified
15. File date of compensation request:	September 23, 2025	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Intervenor’s Comment(s)	CPUC Discussion
5-7	<p>The Protect Our Communities Foundation (“PCF”) meets the definition of a Category 3 customer under the Public Utilities Code as a “representative of a group or organization authorized pursuant to its articles of incorporation or bylaws to represent the interests of residential customers...” (Pub. Util. Code § 1802, subd. (b)(1)(C).) Article 3, Section 3.3 of PCF’s Bylaws specifically authorizes the organization to represent the interests of Southern California residential utility ratepayers in proceedings before the Commission and to seek intervenor compensation for doing so. PCF advocates for just and reasonable rates and against unreasonably costly or unnecessary utility projects. PCF advocates for lawful implementation of statutory mandates, for the protection of communities and natural resources from the impacts of largescale energy and industrial infrastructure projects, and to maximize clean, local, affordable, and equitable energy solutions. PCF is a San Diego, California based nonprofit public benefit corporation organized for charitable and public purposes within the meaning of Section 501(c)(3) of the Internal Revenue Service Code. PCF also qualifies as an environmental group within the scope of Section 1802(b)(1)(C) because it represents the interests of customers with a concern for the environment. A copy of PCF’s current Bylaws are on file with the Commission in R.13-12-010. In R.13- 12-010, PCF was found to</p>	<p>Noted</p>

#	Intervenor’s Comment(s)	CPUC Discussion
	<p>have satisfied eligibility requirements in the September 26, 2014, Administrative Law Judge’s Ruling on Protect Our Communities Foundation’s Amended Showing of Significant Financial Hardship. A copy of PCF’s current Bylaws, as well as a copy of PCF’s current Articles of Incorporation, is also on file in A.15-09-013. In A.15-09-013, PCF was found to have satisfied eligibility requirements in D.19-04-031, Decision Granting Compensation to Protect Our Communities for Substantial Contribution to Decision 18-06-028 (April 25, 2019).</p>	
9-11	<p>PCF continues to meet the Commission’s longstanding definition of significant financial hardship. PCF is a nonprofit public benefit corporation organized exclusively for charitable, educational and public purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code. PCF represents the interests of a specific constituency: San Diego and other Southern California area residential utility ratepayers, the majority of whom do not have the financial ability to represent themselves and whose interests are often not adequately represented in Commission proceedings. Although PCF’s constituents’ rates are among the highest in the nation, the rates for any one household remains small when compared to the resources necessary to participate effectively before this Commission. Pursuant to Public Utilities Code section 1802(h), PCF certifies that the economic interest in the proceeding</p>	<p>Noted</p>

#	Intervenor’s Comment(s)	CPUC Discussion
	<p>of any individual PCF constituent is small compared to the cost of effective participation in this proceeding. Moreover, the Commission has repeatedly determined that PCF’s participation without an award of intervenor compensation imposes a significant financial hardship, including in proceeding A.21-05- 011/014 on October 28, 2021. PCF’s circumstances have not changed in any relevant respect since the above determination was made. Pub. Util. Code, § 1803, subd. (b)(1) (“A finding of significant financial hardship shall create a rebuttable presumption of eligibility for compensation in other commission proceedings commencing within one year of the date of that finding.”).</p>	

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><u>Ratepayer Costs</u> The Commission considered PCF’s arguments and evidence regarding the high expense of lower voltage electrical facility projects and the need to consider the costs to ratepayers when the Utilities build transmission facilities of any voltage, and clarified that whether or not a permit is required for a particular electrical facility or project, the Commission intends to consider the costs of CPUC</p>	<p>“POCF argues that ratepayers will be exposed to unjust and unreasonable rates if the exemption from the CPCN requirement in Pub. Util. Code Section 1001(b) is not accompanied with the commonsense guardrails required by Pub. Util. Code Section 564. POCF argues that the Commission cannot abdicate its authority under the Public Utilities Code, including Sections 451, 454, 701, and 747, to supervise public utilities and ensure just and reasonable rates, irrespective of whether an electrical transmission facility is above a 200-kV level...As is the case today,</p>	<p>Verified</p>

<p>jurisdictional transmission projects in a Utilities’ general rate case or other application, and through the TPR process. Although the Commission did not adopt PCF’s recommendations in full, the Commission clarified that in using the language “in lieu of” in revisions to GO 131, the Commission was not intending to limit the project for which permits are required, but instead was maintaining permit requirements and only changing the process. In Phase 2, the Commission considered the cost concerns that had been raised by PCF initially, as well as by other parties, which led to the Commission rejecting proposals by the Utilities involving increased cost burdens. Additionally, the Commission adopted PCF’s recommendation that the Commission should implement the staff’s Section 3.2, Proposal 2 (which was developed having reviewed and considered PCF’s and others’ comments) to modify Appendix A of GO-131 to include additional items to the list of financial information that electric public utilities provide to the CPUC.</p>	<p>Commission review and approval of costs under the Commission’s jurisdiction would be required in a utility’s General Rate Case or other application prior to the costs being collected in rates. Furthermore, on April 27, 2023, the Commission adopted Resolution E-5252, which established the Transmission Project Review (TPR) Process for the state’s investor-owned electric utilities (IOUs) beginning January 1, 2024. The TPR Process will allow the Commission and stakeholders to receive robust and consistent data from the IOUs, and to inquire about and provide feedback on the IOUs’ historical, current, and forecast transmission projects with actual or forecast capital costs of \$1 million or more.” D.23-12-035, p. 14.</p> <p>“PCF argues that the Decision violates SB 529 because the opening clause of the new paragraph, <i>in lieu of complying with Section III.A</i>, results in the new procedures being applied only to above 200 kV facilities, in contravention of the statute....GO 131-D now authorizes each electrical corporation to use the PTC process or claim an exemption when extending or modifying existing facilities which are 50 kV to 200kV and those that are over 200kV” D.24-06-026, p. 4-5.</p> <p>“Given the concerns raised by several parties regarding ratepayer costs, and environmental impacts, we conclude that the record does not support adoption of the IOUs’ proposal at this time.” D.25-01-055, p. 88.</p> <p>“27. Staff proposals on certain financial reporting requirements which amend the list of financial information that must be reported by electric public</p>	<p>Verified</p>
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<p>The Commission adopted PCF’s² analysis that an authorized facility is not necessarily an existing facility. The Commission agreed with PCF that the Legislature did not intend to define the word “existing” as including facilities that do not yet exist, and deleted the statement in the PD that an existing electrical transmission facility is a facility that has been authorized. Additionally, in Phase 2 of the proceeding, the Commission adopted PCF’s recommendation that PCF recommended that the Commission include in the definition of existing electrical transmission facility only those facilities with an existing permit or certificate that are actually being used and include all facilities within the Commission’s jurisdiction, and the Commission adopted PCF’s recommendation to include all facilities within the Commission’s jurisdiction.</p>	<p>facility as a project that has been authorized, even if it has not been built or is not actually in existence. We agree that an authorized facility does not necessarily equate to an existing facility. Therefore, the statement in the PD indicating that an existing electrical transmission facility is a facility that has previously been authorized has been deleted. Development of definitions for an “extension, expansion, upgrade, or other modification” may produce additional clarification regarding whether “existing electrical transmission facility” requires further definition. Therefore, we direct that a definition of “existing electrical transmission facility” also be further considered during Phase 2 of this proceeding.” D.23-12-035, p. 15-16.</p> <p>“Several parties (EDF, PCF, CBD, IEP, California Farm Bureau Federation (CFBF), and Cal Advocates) support Staff’s proposed definition with modifications...Balancing these considerations, we adopt the modified Staff Proposal Section 1, Proposal 1 definition of “existing electrical transmission facility” as follows: ... an electrical transmission line, power line, substation, or switchyard that has been constructed for operation at or above 50 kV.” D.25-01-055, p. 70-71.</p> <p>“Applicants generally urging us to adopt narrower definitions of the terms... Applicants argued that the proposed definition of ‘existing electrical transmission facility’ could encompass all proposed transmission projects....In developing this staff proposal, staff</p>	<p>Verified and we remind PCF that simply supporting another party’s position is not, in and of itself, a substantial contribution.</p>
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² Throughout this claim, references to “PCF” also refers to parties with whom it filed comments jointly, which PCF did whenever possible to streamline the Commission’s analysis and consideration of the issues and to avoid any duplication of effort.

	<p>carefully reviewed and considered all party comments submitted during Phase 1 and Phase 2 of the R.23-05-018 proceeding...The Decision addressed the Staff Proposal and ‘carefully reviewed and considered all parties’ comments’ and incorporated any as warranted.” D.25-07-042, p. 6-7.</p> <p>PCF Comments on PD Addressing Phase 1 Issues (November 15, 2023), p. 8; Center, Clean Coalition, and PCF Opening Comments on Phase 2 Issues (February 5, 2024), p. 2-7; Center and PCF Reply Comments on Phase 2 Issues (February 26, 2024), p. 10, 13; Center and PCF Opening Comments on Phase 2 Staff Proposal (July 1, 2024), p. 3-4.</p>	
<p><u>Meaningful Consideration of IOU Settlement Needed</u> The Commission adopted the position by PCF and others that the proposed settlement involved Phase 2 issues and should not be subject to curtailed review in Phase 1. The Commission agreed with PCF and others that the settlement went beyond the scope of Phase 1 even though the record for Phase 2 had not yet been developed. The Commission agreed that parties should have adequate opportunity to comment and the Commission should have adequate time to consider Phase 2 issues before deciding whether to adopt the IOU’s proposed settlement agreement.</p>	<p>“The scope of Phase 1 of this proceeding is limited to consideration of changes to GO 131-D necessary to conform it to the requirements of SB 529 and the updating of outdated references. The scope of Phase 2 broadly encompasses consideration of all other changes to GO 131-D. The proposed settlement agreement addresses issues that are within the scope of both phases of this proceeding. ...The timing of the settlement agreement did not provide adequate time for other parties to comment on the settlement agreement and for the Commission to prepare and consider a proposed decision on the settlement agreement, which would have enabled implementation of SB 529 by the January 1, 2024 deadline. ...A record on Phase 2 issues has not yet been fully developed. The proposals in the settlement agreement that are outside the scope of Phase 1 should be considered during Phase 2.” D.23-12-035, p. 17-18.</p>	<p>Verified</p>

	<p>“9. Proposals to modify GO 131-D, which are not within the scope of Phase 1, should be considered during Phase 2.” D.23-12-035, p. 20 (COL 9).</p> <p>Joint Response to Joint Motion for: 1) Modification Of The Scoping Memo And Setting Aside Submittal Of This Proceeding For Consideration Of A Phase 1 Settlement Proposal; And 2) An Order Shorting Time For Comments And Reply Comments On The Settlement Proposal (October 4, 2023), p. 2-7; PCF Opposition to Joint Motion for Adoption of Phase 1 Settlement Agreement (October 30, 2023), p. 2-6.</p>	<p>Verified</p> <p>Verified</p>
<p><u>Alternatives</u> From the beginning of the proceeding, PCF presented detailed legal and factual analysis demonstrating that CAISO does not have the jurisdiction or expertise to consider alternatives to transmission projects in a manner consistent with CEQA, and that the Legislature did not enact any requirements to the contrary or amend CEQA. The Commission considered PCF’s position, took responsibility for undertaking CEQA analysis, and clarified that despite adopting language about CAISO determinations, the Commission was not in fact limiting the Commission’s ability to consider alternatives to future transmission projects notwithstanding the CAISO analysis. PCF enriched the</p>	<p>“Under CEQA, public agencies must not approve a project as proposed if there are feasible alternatives or mitigation measures available that would substantially lessen any significant environmental effects of such a project. D.25-01-055, p. 15; <i>see also</i> D.25-01-055, p. 13, 14 (acknowledging Commission considers project alternatives pursuant to CEQA in both CPCN and PTC processes).</p> <p>“...we adopt the Staff Proposal Section 3.3, Proposal 1 with modifications to add new sections” D.25-01-055, p. 54; <i>see also</i> D.25-01-055, p. 63 (CAISO, CBD³), and DOW support Staff Proposal Section 3.3, Proposal 1, as proposed.”); <i>see also</i> D.25-07-042, p. 10 (clarifying that “[t]he Staff Report argued that certain party proposals would ‘artificially limit[] CEQA’s alternative requirements’ and opposed these options. [] The Decision concurred with the Staff Report.”).</p>	<p>Verified</p> <p>Verified</p>

³ References to “CBD” in D.25-01-055 refer to the comments filed jointly by PCF and the Center.

<p>record by showing that behind the meter solar plus storage provides a much less environmentally damaging alternative to the transmission lines that CAISO plans for without the benefit of CEQA review. Additionally, the Commission adopted PCF’s recommendation not to adopt Section 3.3, Proposal 2 of the Staff Proposal because it would limit the reasonable range of alternatives considered in the CPUC’s CEQA process for CAISO-approved projects. PCF’s participation and legal analysis of CEQA, AB 2292, and AB 1373 enriched the record and allowed the Commission to fully consider the impact of its decision. Ultimately, Commission made clear that the Commission must comply with CEQA, that the Commission will consider project alternatives notwithstanding the changes to GO 131, and that any determinations made by CAISO will constitute only the minimum analysis but will not limit the Commission’s consideration of alternatives under CEQA, each of which PCF had recommended.</p>	<p>“Despite the enactment of AB 2292, which repeals Pub. Util. Code Section 1002.3 that required the Commission’s consideration of cost-effective alternatives during the review of project applications, we find that the Settling Parties’ proposed language limits the range of reasonable and acceptable alternatives considered in an initial draft EIR per requirements in the CEQA Guidelines....To preserve the Commission’s role as lead agency entrusted with the responsibility to certify CPCNs that avoid or mitigate significant environmental impacts associated with proposed projects and adhere to AB 2292 and Pub. Util. Code requirements, we adopt Staff Proposal Section 3.3, Staff Proposal 1, with modifications to GO 131-E, Section VII.C.2, instead of adding the proposed sections to Section IX.C.” D.25-01-055, p. 64.</p> <p>“Further, we clarify that the range of reasonable alternatives to the proposed project in an initial draft EIR circulated for public comment may be limited to alternative routes or locations for construction of the relevant CAISO transmission plan-approved electric project and the “no action” alternative. This modification is necessary to preserve Staff’s discretion to determine that additional project alternatives should be considered based on information presented during the CEQA review process.” D.25-01-055, p. 65.</p> <p>“...the Commission must comply with CEQA and must ensure a thorough review of the record in each CPCN or PTC proceeding for decision-makers and stakeholders to deliberate on reasonable project alternatives during CEQA reviews.” D.25-01-055, p. 132.</p>	<p>Verified</p> <p>Verified</p>
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	<p>“...Section VII.C.2.c does not limit the Commission staff’s ability to consider other project alternatives if warranted.” D.25-07-042, p. 9.</p> <p>“...in its independent CEQA process, Commission staff may still consider other project alternatives as warranted.” D.25-07-042, p. 12.</p> <p>“Applicants allege that in utilizing the project need from CAISO TPP for the EIR’s statement of objectives [] and the range of reasonable alternatives [], we are ‘outsourcing’ our CEQA obligations to CAISO... CEQA Guidelines allow us to rely on a variety of sources and information in preparing an EIR so long as ‘[t]he draft EIR which is sent out for public review’ reflects our ‘independent judgment.’ (Code of Regs., tit. 14, § 15084.) We are ultimately ‘responsible for the adequacy and objectivity of the draft EIR.’ (<i>Ibid.</i>) GO 131-E explicitly recognizes our CEQA obligations.” D.25-07-042, p. 16-17.</p> <p>“According to Applicants, relying only on CAISO’s determination of project need erroneously ‘ensures that the only project alternatives which are considered in future EIRs are those that have characteristics which meet the project configuration that CAISO approves without any consideration of environmental impact.’ ...Section VII.C.2.a....does not limit the statement from including additional objectives if the Commission deems necessary- Section VII.C.2.a is the floor, not the ceiling. A lead agency may not ‘artificially narrow [the] approach for describing the project objectives, [such] that the results of its alternatives analysis would be a foregone conclusion.’” D.25-07-042, p. 13, 15.</p>	<p>Verified</p> <p>Verified</p>
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	<p>PCF Comments on OIR (June 22, 2023), p. 5-6; Center, Clean Coalition, and PCF Opening Comments on Phase 2 Issues (February 5, 2024), p. 15-16, 18-19; Center and PCF Reply Comments on Phase 2 Issues (February 26, 2024), p. 6-9; Center and PCF Opening Comments on Phase 2 Staff Proposal (July 1, 2024), p. 12-14, 31; Center and PCF Reply Comments on Phase 2 Staff Proposal (July 15, 2024), p. 2, 11-14, 19, 21-23; Center and PCF Opening Comments on PD Adopting GO 131-E (January 16, 2025), p. 1-6; 11-12; Joint AfR of D.25-01-055 (March 10, 2025), p. 13-28, 32-34.</p>	
<p><u>Definitions should reflect CEQA and §1001</u> PCF presented legal analysis and citations to show that CEQA’s purpose is to protect the environment, SB 529 was intended to encourage the development of environmentally responsible transmission projects, and the Commission should adopt definitions of extension, expansion, upgrade, modification, equivalent facilities, structures, and accessory construction to specify construction that does not have a significant effect on the environment or rates and in a manner consistent with CEQA and the Public Utilities Code. Although the Commission did not adopt PCF’s recommended definitions in full, the Commission clarified that it</p>	<p>“...we adopt the definition of “extension” (that revises the Staff Proposal Section 3.1, Proposal 2 definition of “extension” to be included in Section I.F., GO 131-E), definition of “expansion” (that applies only to projects that increase the “width, capacity, or capability” of an existing facility), definition of “upgrade” (as proposed by Staff Proposal Section 3.1, Proposal 2, Option 1 but with the deletion of three referenced examples (i.e., I.H.4, I.H.5, and I.H.6)), and definition of “modification” (that is limited by the caveat “without extending or expanding the physical footprint of the facility”)” D.25-01-055, p. 71.</p> <p>“DOW and CBD^[4] propose revising the definition of ‘extension’ to limit its length to prevent the construction of a ‘new’ transmission line that could span hundreds of miles. Pursuant to Pub. Util. Code Section 564 and Section III.A of GO 131-D, CBD suggests revising the definition to read, ‘policy-driven</p>	<p>Verified</p> <p>Verified</p>

⁴ References to “CBD” in D.25-01-055 refer to the comments filed jointly by PCF and the Center.

<p>considered PCF’s legal analysis and factual citations regarding the meaning of the term extension in pre-amendment 1001, and regarding the meaning of the other terms as they are used in CEQA, and adopting definitions more constrained than the Utilities and their allies had proposed. PCF’s participation enriched the Commission’s deliberations and the record and allowed the Commission to more fully consider the impact of the definitions ultimately adopted by the Commission. Additionally, the Commission adopted PCF’s recommendation that the Commission should protect ratepayers interests by rejecting the broad definitions proposed by the Utilities and their allies, and the Commission adopted PCF’s recommendation by rejecting the Utilities’ proposed broad definitions for modification, extension, expansion, and upgrade.</p>	<p>construction, within an existing easement, right of way, or franchise agreement, of an electric transmission or power line facility that connects an existing electric transmission facility to a service delivery point and does not have a significant effect on the environment or rates.” D.25-01-055, p. 73-74.</p> <p>“Upon consideration of Staff Proposal Section 3.1, Proposal 2 and party comments, we adopt a definition of ‘expansion’ that applies only to projects that increase the ‘width, capacity, or capability’ of an existing facility.” D.25-07-042, p. 77.</p> <p>“...broadening the language [as the IOUs proposed] to include modifications that ‘better serve an existing purpose,’ in addition to those that ‘serve a new or additional purpose’ would encompass nearly any conceivable purpose for such infrastructure. As such, it is not necessary to specify that modifications serve a particular purpose.” D.25-01-055, p. 79.</p> <p>D.25-07-042, p 5 (“We adopted the definitions in the Decision following extensive briefing, record development, and consideration of numerous contrary positions, including those of Appellants”).</p> <p>Center, PCF, Clean Coalition Comments on Phase 2 Issues (February 5, 2024), p. 7-12; Center and PCF Reply Comments on Phase 2 Issues (February 26, 2024), p. 1-5; Center and PCF Opening Comments on Phase 2 Staff Proposal (July 1, 2024), p. 4-10; Center and PCF Reply Comments on Phase 2 Staff Proposal (July 15, 2024), p. 3-6; Center</p>	<p>Verified</p> <p>Verified</p> <p>Verified</p> <p>Verified</p>
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	<p>and PCF Opening Comments on PD Adopting GO 131-E (January 16, 2025), p. 8-11; PCF, Center, Acton Town Council, California Farm Bureau Federation, Anza Borrego Foundation, and Defenders of Wildlife AfR of D.25-01-055 (March 10, 2025), p. 4-13.</p>	
<p><u>PTC exemptions cannot exceed CEQA exemptions</u> PCF enriched the Commission’s deliberations and the record and allowed the Commission to more fully consider the impact of the exemption provisions in GO 131, by providing detailed legal analysis showing that the exemptions to GO 131 do not reflect the exemptions to environmental review set forth in CEQA. The Commission clarified that it was not attempting to modify the CEQA exemptions, but rather that it was detailing the scenarios that CEQA does not apply at all. Exposing the Commission’s legal analysis provided transparency and could benefit the public should the Commission decline to require a PTC in the future where it would otherwise have been required under CEQA. Although the Commission did not adopt exemptions consistent with CEQA as PCF recommended, the Commission acknowledged its responsibility for ascertaining CEQA exemptions and that the Utilities cannot unilaterally decide not to conduct environmental review.</p>	<p>“The last paragraph of Section III.B.1 states that a notice of proposed construction must be issued for most PTC-exempt projects in compliance with Section IX.B, except for those that are statutorily or categorically exempt from CEQA. Reading these Section III.B.1 provisions together could lead a utility to initially determining that a project is statutorily or categorically exempt from CEQA, and subsequently determining that it is not subject to noticing requirements. Such reading is not consistent with the CEQA Guidelines that place responsibility for making these determinations with lead agencies.” D.25-01-055, p. 99.</p> <p>“Applicants allege that certain PTC exemptions adopted by the Decision improperly expand the project exemptions outlined in the CEQA Guidelines.” D.25-07-042, p. 17.</p> <p>“...none of these provisions modify CEQA. Instead, they govern which projects require our approval (and only then CEQA action). Whether GO 131-E’s exemptions are more or less broad than CEQA exemptions is irrelevant... Unlike <i>UMMP</i>, GO 131-E does not authorize any transmission projects. Instead, GO 131-E sets out the permitting requirements and our CEQA obligations for any future projects...GO 131-E explicitly subjects us to performing environmental review as necessary.” D.25-07-42, p. 18-20.</p>	<p>Verified, however, as noted by PCF, the Commission did not adopt PCF’s recommendations with D.25-07-042 stating “Whether GO 131-E’s exemptions are more or less broad than CEQA exemptions is irrelevant” at page 18. We remind PCF that “enriching the deliberations and record” does not, in and of themselves, constitute a substantial contribution, particularly when the record conveys the relevancy of the position. We, therefore, reduce the hours associated with the CEQA/GO-</p>

	<p>PCF, Center, Clean Coalition Opening Comments on Phase 2 Issues (February 5, 2024), p. 4; Center and PCF Comments on Phase 2 Staff Proposal (July 1, 2024), p. 3, 21; PCF and Center Opening Comments on Phase 2 PD (January 16, 2025), p. 11-12; Joint AfR of D.25-01-055, p. 28-30.</p>	<p>131 exemptions. See Part III.D[6] for more details.</p>
<p><u>CEQA timeframes</u> The Commission adopted the recommendations by PCF and Center to approve Staff Proposal Section 3.8, Proposal 1, and to reject Section 3.8, Proposal 3, in compliance with the timeframes set forth in CEQA.</p>	<p>“Cal Advocates, CBD, and PCF agree with Staff’s determination that Staff Proposal Section 3.8, Proposal 1 is consistent with the time limits for EIR preparation listed in the CEQA Guidelines.” D.25-01-055, p. 44.</p> <p>“Staff Proposal Section 3.8, Proposal 1 and related GO 131-D revisions, as reflected in Attachment B to this decision (modifying GO 131-D Section XVI, which would be GO 131-E Section XIII, to clarify that the Commission is subject to the timeframes and deadlines set in CEQA and the CEQA Guidelines), should be adopted.” D.25-01-055, p. 147.</p> <p>“Based on review of recent proceedings, the time required to issue a permit for many projects subject to Commission review requiring an EIR, exceeds the 270-day deadline as proposed by Settling Parties. Therefore, we reject Staff Proposal Section 3.8, Proposal 3.” D.25-01-055, p. 52</p>	<p>Verified</p> <p>Verified</p> <p>Verified</p>

	<p>Comments on Phase 2 Staff Proposal (July 1, 2024), p. 15-16; Center and PCF Reply Comments on Phase 2 Issues (February 26, 2024), p. 14-15.</p>	<p>Verified</p>
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	<p>Intervenor’s Assertion</p>	<p>CPUC Discussion</p>
<p>a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?</p>	<p>Yes</p>	<p>Yes</p>
<p>b. Were there other parties to the proceeding with positions similar to yours?</p>	<p>Yes</p>	<p>Yes</p>
<p>c. If so, provide name of other parties: Center for Biological Diversity, Clean Coalition, Sierra Club, Acton Town Council, California Farm Bureau Federation, Anza Borrego Foundation, Defenders of Wildlife</p>		<p>Verified</p>
<p>d. Intervenor’s claim of non-duplication: PCF collaborated and coordinated with a number of parties throughout the proceeding, including Center for Biological Diversity, Acton Town Council, California Farm Bureau Federation, Anza Borrego Foundation, Defenders of Wildlife, Clean Coalition, Sierra Club, and Cal Advocates, to ensure efficient advocacy and avoid duplication of efforts. Each organization brought a distinct perspective and unique experience to the proceeding, which the Legislature recognizes provides great benefits for the Commission’s decision-making. PCF met with parties regularly, submitted filings jointly whenever possible to avoid duplication and instead to materially supplement each other’s advocacy. PCF and these parties shared their knowledge, expertise, and their distinct institutional perspectives with one another, to ensure the most effective, complementary, and streamlined advocacy.</p>		<p>Noted</p>

C. Additional Comments on Part II:

<p>#</p>	<p>Intervenor’s Comment</p>	<p>CPUC Discussion</p>
<p>II(A)</p>	<p>Substantial Contribution. Pursuant to Section 1802(j), “Substantial contribution” means that, in the judgment of the commission, the customer’s</p>	<p>Noted</p>

#	Intervenor’s Comment	CPUC Discussion
	<p>presentation has substantially assisted the commission in the making of its order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer.”</p>	
II(A)	<p>Substantial Contribution Includes Enriching Deliberations or the Record. Past Commission decisions instruct that intervenors substantially contribute when they have “provided a unique perspective that enriched the Commission’s deliberations and the record.” (D.05-06-027, p. 5); when they have “assisted the Commission in the decision-making process” (D.19-10-019, p. 3-4); when they provide a full discussion of the matters at issue so as to allow the Commission “to fully consider the consequences of adopting or rejecting” the parties’ proposals (D.08-04-004, p. 5-6); and when they offer alternative evaluations of the disputes addressed (D.19-10-019, p. 5-6).</p>	Noted
II(A)	<p>Substantial Contribution Includes Procedural Recommendations. The Commission recognizes that “[p]rocedural outcomes are statutorily recognized as substantial contribution.” (D.19-10-019, p. 7; p. 4 [adoption of “procedural recommendations related to scheduling and evidence.”].)</p>	Noted

#	Intervenor’s Comment	CPUC Discussion
II(B)(d)	<p>No Duplication. No reduction to PCF’s compensation due to duplication is warranted given the standard adopted by the Commission in D.03-03-031 and consistent with Public Utilities Code Sections 1801.3(b) & (f), 1802(j), 1802.5, and 1803. Section 1803 sets forth the requirements for awarding intervenor compensation. Pub. Util. Code, § 1803; D.03-03-031, p. 12-14. An award of compensation for reasonable fees for participation in a proceeding is required when an intervenor (1) complies with Section 1804 and (2) “satisfies both of the following requirements: (a) The customer’s presentation makes a substantial contribution to the adoption, in whole or in part, of the commission’s order or decision. (b) Participation or intervention without an award of fees or costs imposes a significant financial hardship.” Pub. Util. Code, § 1803. Section 1801.3(f) seeks to avoid only (1) “unproductive or unnecessary participation that duplicates the participation of similar interests otherwise adequately represented” or (2) “participation that is not necessary for a fair determination of the proceeding.” Pub. Util. Code, § 1801.3, subd. (f); D.03-03-031, p. 15-18. The “duplication language contained in the first dependent clause requires the compensation opponent to establish three elements – duplication, similar</p>	<p>Noted</p>

#	Intervenor’s Comment	CPUC Discussion
	<p>interests, and adequate representation.” D.03-03-031, p. 18. Section 1802.5 provides for full compensation where participation “materially supplements, complements, or contributes to the presentation of another party.” Pub. Util. Code. § 1802.5; see also D.03-03-031, p. 14.</p>	

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
<p>a. Intervenor’s claim of cost reasonableness: PCF’s fees are small compared to the benefits California ratepayers will ultimately realize as the result of PCF’s contributions to this proceeding. PCF’s advocacy to preserve consideration of project alternatives to transmission lines facilitates consideration of far less expensive alternatives to transmission lines. Avoiding transmission lines significantly reduces the cost burden on ratepayers by not only avoiding the costs of the transmission lines themselves, but also by avoiding the profits that ratepayers are forced to pay the utilities on top of the costs of the transmission lines. PCF’s participation resulted in the Commission clarifying that it was not exempting projects from permitting and that the Commission expects the utilities to continue to comply with CEQA, which benefits ratepayers not only by leaving open the possibility that the Commission will reject expensive transmission lines in favor of least-cost alternatives, but also the possibility that the Commission will be able to prevent the environmental degradation that arises when decision-makers do not consider the environmental consequences of their decisions before those decisions are made. Although the actual dollar value of the benefit to ratepayers accruing from PCF’s participation will not be fully realized until subsequent projects are proposed and considered, the value of avoiding unnecessary transmission lines will benefit ratepayers in terms of avoiding both increased rates and the environmental harm inherent to expensive transmission lines.</p>	<p>Noted</p>
<p>b. Reasonableness of hours claimed: PCF’s hours are reasonable for its work in this proceeding because PCF used its attorneys efficiently and effectively. Ms. Dickenson’s extensive experience in other matters before the Commission and as a public agency</p>	

	CPUC Discussion														
<p>lawyer and litigator, including a background in CEQA and land use litigation, dramatically reduced the number of hours involved in PCF’s participation. In an effort to minimize costs, PCF staff attorney Jonathan Webster, whose rates are significantly lower than Ms. Dickenson’s, prepared the first drafts of documents. Additionally, PCF leveraged the unprecedented legal expertise of former CPUC Present Ms. Lynch, where utilizing Ms. Lynch’s knowledge would save PCF time, such as with respect to the details of CAISO review and jurisdiction. To further reduce costs, PCF staff attorney Andrea White, whose rate is significantly lower than Ms. Dickenson’s, performed the majority of the work to prepare this request. PCF does not claim time spent on any administrative matters, such as time spent filing and serving comments, or to prepare, serve, and submit exhibits. All of the hours claimed in this request were reasonably necessary to PCF’s participation in R.23-05-018.</p>	Noted														
<p>c. Allocation of hours by issue:</p> <table border="0"> <thead> <tr> <th><u>Description</u></th> <th><u>%</u></th> </tr> </thead> <tbody> <tr> <td>Phase 1: compliance with SB 529</td> <td>13.50%</td> </tr> <tr> <td>Phase 2: other changes to GO 131-D</td> <td>66.18%</td> </tr> <tr> <td>Procedural recommendations</td> <td>7.77%</td> </tr> <tr> <td>Coordination with Other Parties</td> <td>11.39%</td> </tr> <tr> <td>General Participation</td> <td>1.15%</td> </tr> <tr> <td></td> <td>100.00%</td> </tr> </tbody> </table>	<u>Description</u>	<u>%</u>	Phase 1: compliance with SB 529	13.50%	Phase 2: other changes to GO 131-D	66.18%	Procedural recommendations	7.77%	Coordination with Other Parties	11.39%	General Participation	1.15%		100.00%	Noted
<u>Description</u>	<u>%</u>														
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Procedural recommendations	7.77%														
Coordination with Other Parties	11.39%														
General Participation	1.15%														
	100.00%														

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Malinda Dickenson	2023	31.8	\$665	D.25-04-017	\$21,147	31.80	\$665.00 [1]	\$21,147.00
Malinda Dickenson	2024	71.65	\$700	D.25-04-017	\$50,155	70.35 [6]	\$725.00 [1]	\$51,003.75

CLAIMED						CPUC AWARD		
Malinda Dickenson	2025	66.3	\$725	Approved 2024 rate of \$700 *CPUC escalation of 1.0346 for 2025=\$725	\$48,068 ⁵	66.30	\$750.00 [2]	\$49,725.00
Jonathan Webster (Pre-Bar)	2023	45.0	\$250	D.24-12-064	\$11,575 ⁶	45.00	\$150.00 [3]	\$6,750.00
Jonathan Webster ⁷ (Post-Bar)	2023	1.3	\$250		\$325.00 ⁸	1.30	\$250.00 [3]	\$325.00
Jonathan Webster	2024	150	\$280	D.25-01-026	\$42,000	137.80 [6]	\$260.00 [3]	\$35,828.00
Loretta Lynch	2024	7	\$770	Approved 2023 rate of \$745 [from D.24-09-048]*CPUC escalation of 1.0407 for 2025=\$770 (rounded down so as not to exceed maximum)	\$5,390	0.00 [4]	N/A [4]	\$0.00
Subtotal: \$178,335⁹						Subtotal: \$164,778.75		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Malinda Dickenson	2023	1.5	\$332.50	½ hourly rate	\$498.75	1.50	\$332.50 [1]	\$498.75

⁵ Correct calculation totals \$48,067.50

⁶ Calculation Update: Due to addition of split for pre-bar and post-bar work, the updated total for pre-Bar is \$11,250.00.

⁷ For clarity, the Commission has added a row to differentiate between pre-Bar and post-Bar hours.

⁸ Calculation Update: Due to addition of split for pre-bar and post-bar work, the updated total for post-Bar is \$325.00.

⁹ Calculation error described in footnote 6 brings correct requested subtotal to \$178,334.50.

CLAIMED						CPUC AWARD		
Andrea White	2025	15	\$145	½ of hourly rate (Approved 2024 rate of \$265 *CPUC escalation of 1.0346 for 2025 =\$275 + step increase =\$290)	\$2,175.00	15.00	\$142.50 [5]	\$2,137.50
Malinda Dickenson	2025	5	\$362.5	½ hourly rate	\$1,812.50	5.00	\$375.00 [2]	\$1,875.00
Subtotal: \$4,486.25						Subtotal: \$4,511.25		
TOTAL REQUEST: \$182,820.75						TOTAL AWARD: \$169,290.00		

*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate

ATTORNEY INFORMATION

Attorney	Date Admitted to CA BAR ¹⁰	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Malinda Dickenson	12/4/2002	222564	No
Jonathan Webster	12/5/2024 ¹¹	351823	No
Andrea White	12/5/2023	351824	No
Loretta Lynch	12/14/1990	151206	No

C. Attachments Documenting Specific Claim and Comments on Part III¹²:

Attachment or Comment #	Description/Comment

¹⁰ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

¹¹ Jonathan Freedman Webster (Attorney #351823) was accepted to the California State Bar 12/05/2023.

¹² Attachments not included in final Decision.

Attachment or Comment #	Description/Comment
Attachment #1	Certificate of Service
Attachment #2	Time Sheet and Categorization
Comment #1	PCF requests a rate of \$725 for Ms. Dickenson’s time in 2025, based on Ms. Dickenson’s approved 2024 rate times the adopted CPUC escalation rate for 2025 ($\$700 \times 1.0346 = \725). Ms. Dickenson remains on staff at PCF.
Comment #2	<p>PCF requests a rate for Ms. White for 2024 based on the rate that has already been approved by the Commission.</p> <p>PCF requests a rate of \$290 for Ms. White’s time in 2025, based on Ms. White’s approved 2024 rate times the adopted CPUC escalation for 2025, plus a step increase, as is permitted twice per category. ($\\$265 \times 1.05 \times 1.0346 = \\290). Ms. White remains on staff at PCF.</p>
Comment #3	<p>PCF requests a rate of \$745 for Ms. Lynch’s time in 2023, based on Ms. Lynch’s approved 2022 rate of \$715, times the CPUC adopted escalation rate of 1.0446 for 2023.</p> <p>PCF requests a rate of \$770 for Ms. Lynch’s time in 2024, based on Ms. Lynch’s 2023 rate of \$745, times the adopted CPUC escalation of 1.0407 for 2024, rounded down so as not to exceed the maximum attorney rate.</p> <p>PCF requests a rate of \$795 for Ms. Lynch’s time in 2025, based on Ms. Lynch’s 2024 rate of \$770, times the adopted CPUC escalation of 1.0346 for 2025.</p> <p>PCF agreed to pay Ms. Lynch the above rates for Ms. Lynch’s work performed in 2023 and 2024. PCF does not retain funds awarded to outside attorneys like Ms. Lynch.</p>

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Malinda Dickenson 2023 and 2024 Hourly Rates	<p>D.25-04-017 approved 2023 hourly rates of \$665.00. We apply the same rate here.</p> <p>Additionally, D.25-04-017 verified a 2024 hourly rate of \$700.00 for Malinda Dickenson but did not apply the escalation factor to that 2024 rate pursuant to Resolution ALJ-393. We therefore apply the applicable 2024 escalation factor</p>

Item	Reason
	<p>of 4.07% to the 2024 rate of \$700.00, and rounded to the nearest allowable five-dollar increment, we find:</p> <p>2024: $\\$700.00 \times 1.0407 = \\725.00</p> <p>We find the <i>updated</i> 2024 rate of \$725.00 reasonable and adopt it here.</p> <p>Intervenor Compensation Claim Preparation is compensated at ½ of the preparer’s normal rate, bringing the 2023 claim preparation rate to \$332.50.</p>
<p>[2] Malinda Dickenson 2025 Hourly Rate</p>	<p>Comment [1], see above, adopted an <i>updated</i> 2024 hourly rate of \$725.00 for Dickenson. For 2025, we apply the 2025 escalation factor, per Resolution ALJ-393, of 3.46% to Dickenson’s approved 2024 hourly rate for a 2025 hourly rate of \$750.00.</p> <p>Intervenor Compensation Claim Preparation is compensated at ½ of the preparer’s normal rate, bringing the 2023 claim preparation rate to \$375.00.</p>
<p>[3] Jonathan Webster 2023 and 2024 Hourly Rates</p>	<p>PCF requested 2023 and 2024 hourly rates of \$250.00 and 280.00 respectively for Jonathan Webster as a Legal – Attorney – I. We note PCF’s 2023 requested rate for Jonanathan Webster cited D.24-12-064 in the basis for rate column for 2023 and D.25-01-026 for a 2024 rate of \$280.00. Additionally, PCF did not provide rate justification for the requested rates in Part III.C.</p> <p>For work performed pre-Bar (12/5/2023), D.25-01-026 verified a 2023 hourly rate of \$150.00 for Webster as a Legal – Paralegal - I. We apply the same rate here.</p> <p>For work performed post-Bar, D.24-12-064 verified a 2023 hourly rate of \$250.00 for Webster. We apply the same rate here.</p> <p>Based on the approved 2023 hourly rate of \$250.00 established in D.24-12-064, we apply the 2024 escalation factor of 4.07% and round to the nearest \$5 increment, for the following 2024 rate:</p> <p>2024: $\\$250.00 \times 1.0407 = \\260.00</p> <p>We find the 2024 hourly rate of \$260.00 reasonable and correct this rate moving forward. We note this change does not affect previous decisions.</p>
<p>[4] Loretta Lynch Reduction of Hours for Lack of</p>	<p>Review of the submitted timesheets found 7.0 hours for Loretta Lynch, containing the following entries:</p> <p>7/12/2024 – Skim PCF, ATC opening comments & ALJ ruling (1.5) 7/12/2024 – Provide substantive feedback on reply comments (3.0)</p>

Item	Reason
<p>Substantial Contribution</p>	<p>7/14/2024 – Provide substantive feedback on intro & first 3 sections of draft 2 of reply brief (1.0) 7/14/2024 – Provide substantive feedback on Secs IV-VI of reply draft 2 & send email explaining remaining issues to address (1.5)</p> <p>The Commission compensates intervenors for reasonable and efficient participation that contributes to the development of the record and aids in decision-making. However, we find that Loretta Lynch's claimed hours reflect a significant duplication of effort. Specifically, multiple representatives - whether attorneys or experts - worked on the same issues, attended the same meetings, hearings, or workshops, and participated in activities where only one representative would have been sufficient, given the relative simplicity or limited scope of the issues involved. Given Malinda Dickenson and Jonathan Webster, the former serving as Legal Director for PCF, both contributed efforts to the reply comments, we find the requested hours for Loretta Lynch unreasonable, duplicative in nature, and did not substantially contribute to the underlying decisions. We, therefore, reduce 7.0 hours for Loretta Lynch for the reasons listed above. As such, no rate determination is necessary for Loretta Lynch’s 2024 hourly rate.</p> <p>This level of staffing resulted in unnecessary, redundant, and inefficient participation that did not provide added value to the proceeding. Accordingly, we find that the involvement of multiple representatives in these instances was not justified and resulted in excessive hours. As a result, we reduce the claim by hours to ensure that only reasonable and non-duplicative efforts are compensated.</p> <p>Additionally, we note that Loretta Lynch served as an outside consultant and the intervenor compensation claim filing did not contain supporting documentation to substantiate Loretta Lynch’s requested rate.</p>
<p>[5] Andrea White 2025 Hourly Rate</p>	<p>PCF requested a 2025 hourly rate of \$290.00 for White. We note the request includes the second requested step-increase for Andrea White as Legal – Attorney – I.</p> <p>D.24-04-017 approved a 2024 hourly rate of \$265.00 for White. Using our calculation methodology based on the established 2024 hourly rate of \$265.00, application of the 2025 escalation factor of 3.46% and second 5% step-increase and rounding to the nearest allowable \$5 increment, we find:</p> <p>2025: $\\$265.00 \times 1.0846 = \\285.00</p> <p>We find the 2025 rate of \$285.00 reasonable and adopt it here. Intervenor Compensation Claim Preparation is compensated at ½ the preparer’s normal rate, bringing the 2025 claim preparation rate to \$142.50.</p>

Item	Reason
	We note that this is White’s second, and last, step increase for the Legal – Attorney – Level I classification. Additionally, Andrea White passed the bar on 12/5/2023, therefore, qualify for a level increase to Legal – Attorney – II beginning 12/5/2025.
[6] Reduction of Hours for Work Associated with CEQA/GO 131-E Exemptions	As noted in Part II, we find the claimed contribution re: CEQA/GO 131-E Exemptions did not substantially contribute to the decision. Therefore, we reduce 13.5 hours associated with the following timesheet entries: Malinda Dickenson – 1.30 2/23/2024 – Review JW memo re CEQA exemptions 7/12/2024 – Research re and draft CEQA exemption section Jonathan Webster – 12.20 1/9/2024 - Research CEQA definitions of "existing", categorical exemptions, etc. 2/13/2024 – CEQA exemption research for phase 2 issues 2/14/2024 – Research CEQA exemptions and how they interact with proposed definitions by parties 2/20/2024 – Review cal adv proposal with special attention environmental review and CEQA requirements 7/12/2024 – Research CEQA exemption regulations

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. Protect Our Communities Foundation has made a substantial contribution to D.23-12-035, D.24-06-026, D.25-01-055 and D.25-07-042.
2. The requested hourly rates for Protect Our Communities Foundation’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 \$169,290.00.

CONCLUSION OF LAW

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

ORDER

1. Protect Our Communities Foundation is awarded \$169,290.00.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Bear Valley Electric Service, Inc., Liberty Utilities (CalPeco Electric) LLC, and PacifiCorp d.b.a. Pacific Power shall pay Protect Our Communities Foundation their respective shares of the award, based on their California electric revenues for the 2024 calendar year, to reflect the year in which the proceeding was primarily litigated. If such data is 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 December 7, 2025, the 75th day after the filing of Protect Our Communities Foundation'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 June 11, 2026, at Sacramento, 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**

Compensation Decision:	D2606027	Modifies Decision?	No
Contribution Decision(s):	D2312035, D2406026, D2501055, D2507042		
Proceeding(s):	R2305018		
Author:	ALJ Zhang		
Payer(s):	Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Bear Valley Electric Service, Inc., Liberty Utilities (CalPeco Electric) LLC, and PacifiCorp d.b.a. Pacific Power		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Protect Our Communities Foundation	September 23, 2025	\$182,820.75	\$169,290.00	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
Malinda	Dickenson	Attorney	\$665	2023	\$665.00
Malinda	Dickenson	Attorney	\$700	2024	\$725.00
Malinda	Dickenson	Attorney	\$725	2025	\$750.00
Jonathan	Webster	Attorney	\$250	2023	\$250.00
Jonathan	Webster	Attorney	\$280	2024	\$260.00
Loretta	Lynch	Attorney ¹³	\$770	2024	N/A
Andrea	White	Attorney	\$290	2025	\$285.00

(END OF APPENDIX)

¹³ Loretta Lynch is identified as a Consultant.