

Decision 26-06-028 June 11, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for
Approval of Zonal Electrification Pilot Project (U 39G)

Application 22-08-003
(Filed August 10, 2022)

**DECISION GRANTING COMPENSATION TO THE UTILITY REFORM NETWORK
FOR SUBSTANTIAL CONTRIBUTION TO DECISION (D.) 25-11-004**

Intervenor: The Utility Reform Network (TURN)	For contribution to Decision (D.) 25-11-004
Claimed: \$133,691.88	Awarded: \$133,691.88
Assigned Commissioner: John Reynolds	Assigned ALJ: Camille Watts-Zagha

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	In D.25-11-004, the Commission granted Pacific Gas and Electric Company’s (PG&E’s) motion to withdraw this application for a zonal building electrification project at California State University Monterey Bay (CSU Monterey Bay), which would have allowed PG&E to retire, instead of replace, a gas distribution pipeline in need of repair. While granting PG&E’s motion, the Commission also recognized the value of the voluminous record developed before PG&E filed its motion to withdraw, and took steps to ensure the record will be made available for future use, if relevant to future proceedings. Further, the Commission ordered PG&E to prepare and file a “Lessons Learned” report, with input from all parties, to memorialize policy, cost and ratepayer impacts, and operational experiences with the CSU Monterey Bay project.
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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:	9/29/22	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	10/27/22	Verified
4. Was the NOI timely filed?		Yes
Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	A.21-12-007	Verified
6. Date of ALJ ruling:	5/31/22	Verified
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	A.21-12-007	Verified
10. Date of ALJ ruling:	5/31/22	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.25-11-004	Verified
14. Date of issuance of Final Order or Decision:	11/25/25	Verified
15. File date of compensation request:	1/23/26	Verified
16. Was the request for compensation timely?		Yes

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

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>TURN contributed to the Commission’s review of PG&E’s motion to withdraw its application in D.25-11-004.</p> <p>TURN articulated the standard of review when an applicant moves to withdraw its application. The Commission incorporated the legal standard TURN suggested nearly verbatim in D.25-11-004.</p> <p>TURN demonstrated that PG&E’s motion was poorly supported. TURN, and others, pointed to PG&E’s failure to explain why the procedural schedule adopted in July 2024 created new safety concerns, among other deficiencies. PG&E supplemented its explanation in subsequent filings defending its motion to withdraw. The Commission agreed with TURN et al. that PG&E’s motion was vague and unspecific, though it found PG&E’s expanded explanation adequate and ultimately concluded that PG&E should be permitted to withdraw its application.</p> <p>TURN, and others, argued that the electrification project offered benefits consistent with the public interest. The Commission agreed while granting PG&E’s motion.</p>	<ul style="list-style-type: none"> • TURN Resp. to PG&E Motion to Withdraw Application, 1/29/25, pp. 3-4 • D.25-11-004, pp. 7-8 • TURN Resp. to PG&E Motion to Withdraw Application, 1/29/25, pp. 5-7 • D.25-11-004, p. 11 • TURN Resp. to PG&E Motion to Withdraw Application, 1/29/25, p. 2 • D.25-11-004, p. 13 	<p style="text-align: center;">Verified</p> <p style="text-align: center;">Verified</p> <p style="text-align: center;">Verified</p>
<p>TURN demonstrated that the Commission should ensure the record of this proceeding will be made</p>	<ul style="list-style-type: none"> • TURN Resp. to PG&E Motion to Withdraw 	<p style="text-align: center;">Verified</p>

<p>available for use in relevant future proceedings.</p> <p>TURN argued that if the Commission granted PG&E’s motion to withdraw the application, the Commission should preserve the record here for use in other relevant proceedings. To this end, TURN specifically recommended that the Commission:</p> <ol style="list-style-type: none"> 1) Direct PG&E to disclose the existence of this application, the record developed here, and the Commission’s decision in all future PG&E zonal building electrification proposals, including but not limited to SB 1221 projects; 2) Clarify that the entire record of this proceeding shall be available for potential use in future Commission proceedings to which it may be relevant. <p>The Commission agreed in D.25-11-004 that the evidentiary record in this proceeding could be helpful to future Commission proceedings addressing zonal electrification projects or decarbonization policies. The Commission also agreed that parties should be permitted to seek to bring work done in this proceeding into other relevant proceedings. The Commission accordingly required PG&E to disclose the existence of the record of this proceeding in any future applications or comments on Orders Instituting Rulemaking relating to zonal electrification or decarbonization policy filed within three years of the issuance date of this decision.</p>	<p>Application, 1/29/25, p. 12</p> <ul style="list-style-type: none"> • D.25-11-004, pp. 15-16; Finding of Fact 2; Conclusion of Law 2; Ordering Paragraph 2 	<p>Verified</p>
<p>TURN demonstrated that the Commission should require PG&E to prepare and file a Lessons Learned</p>		

<p>report with input from all interested parties.</p> <p>TURN argued that if the Commission granted PG&E’s motion to withdraw the application, the Commission should require PG&E to publicly memorialize its lessons learned from experience with the CSUMB electrification project by preparing a report, with input from all interested parties, on this ambitious but ultimately unsuccessful zonal building electrification pilot program.</p> <p>When the proposed decision preceding D.25-11-004 required PG&E to submit a Lessons Learned report without requiring PG&E to obtain input from all interested parties, TURN (and others) advocated modification of the PD to make this requirement explicit.</p> <p>The Commission in D.25-11-004 modified the proposed decision as suggested by TURN et al. and ordered PG&E to seek input from parties and collaboratively draft a ‘lessons learned’ report summarizing policy, cost and ratepayer impacts, and operational experiences with this project and to file the report in R.24-09-012 and in R.19-01-011.</p> <p>In compliance with D.25-11-004, PG&E provided a draft Lessons Learned report to parties on December 23, 2005, for feedback. TURN provided written feedback to PG&E to incorporate into the final Lessons Learned report, which will be filed by PG&E by January 26, 2026 pursuant to Ordering Paragraph 4 of D.25-11-004. TURN’s contribution to the Lessons Learned report contributes to the implementation of D.25-11-004, and specifically the Commission’s recognition of the value</p>	<ul style="list-style-type: none"> • TURN Resp. to PG&E Motion to Withdraw Application, 1/29/25, p. 12 • TURN Reply Cmts. on PD, 10/27/25, pp. 1, 3 • Proposed Decision, Rev. 1, REDLINE, p. 16 • D.25-11-004, p. 16; Conclusion of Law 3; Ordering Paragraphs 3, 4 • Feedback of The Utility Reform Network (TURN) on PG&E’s Draft A.22-08-003 “Lessons Learned” Report, 1/14/26 (See Attachment 4 to this Claim) 	<p>Verified</p> <p>Verified</p> <p>Verified</p> <p>Verified</p> <p>Verified</p>
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<p>of a Lessons Learned report reflecting the perspectives of all stakeholders, not just PG&E.</p>		
<p>TURN contributed information and analysis to the record that the Commission recognized as valuable in D.25-11-004 and which informed the Commission’s orders therein.</p> <p>The Commission’s order requiring PG&E to reference the record here in future related requests, discussed above, recognizes the value of parties’ contributions, including TURN’s. Similarly, the Commission’s order requiring PG&E to collaborate with the active parties in preparing and submitting a Lessons Learned report based on this proceeding, discussed above, recognizes the value of parties contributions to the proceeding learnings.</p> <p>TURN actively participated in this proceeding from its inception in September 2022 until its abrupt termination and contributed in substantial ways to the proceeding record and lessons learned.</p> <p>TURN conducted extensive discovery on PG&E’s proposed CSU Monterey Bay electrification project and submitted three volumes of testimony addressing: (1) the need for the gas pipeline replacement project, which was not fully supported by PG&E’s application; (2) cost estimates for the gas pipeline project and electrification project; (3) PG&E’s Net Present Value (NPV) methodology for evaluating cost-effectiveness and impact of the proposed project on ratepayers, as well as other methodologies (Present Value of Revenue Requirements (PVRR); (4)</p>	<p><i>See, generally:</i></p> <ul style="list-style-type: none"> • D.25-11-004, pp. 15-16; Finding of Fact 2; Conclusion of Law 2; Ordering Paragraph 2 • D.25-11-004, p. 16; Conclusion of Law 3; Ordering Paragraphs 3, 4 • Ex. TURN-01 (TURN Testimony, 2/17/23), Ex. TURN-02 (TURN Rebuttal Testimony, 3/17/23), and Ex. TURN-03 (TURN Supplemental Testimony, 9/30/24) (identified in PG&E Motion for Admission of Exhibits Into Evidence, 12/13/24, and admitted into evidence via 12/22/24 <i>Email Ruling Addressing Evidentiary Issues</i>) • Motion of PG&E to Adopt Joint Parties’ Briefing Outline and Stipulations, 12/13/24, as clarified by PG&E on December 27, 2024, Attachment A • <i>Email Ruling of ALJ Camille Watts-Zagha Granting Motion to</i> 	<p>Verified</p> <p>Verified</p> <p>Verified</p> <p>Verified</p> <p>Verified</p>

<p>cost containment approaches to ensure ratepayer neutrality if not net benefit; (5) cost recovery and ratemaking; and (6) data collection and reporting requirements to ensure the electrification pilot provided important information to inform future policy and projects.</p> <p>Once PG&E re-started proceeding activities in mid-2024 after the year-long hiatus during negotiations between PG&E and CSU Monterey Bay, TURN joined PG&E representatives, other intervenors, and Commission staff in a site visit to the CSU Monterey Bay campus on July 29, 2024, which helped to inform TURN’s subsequent analysis and supplemental testimony.</p> <p>TURN participated in a series of meetings over the course of the two-year proceeding with PG&E and other parties to explore potential settlement of disputed issues. Once a global settlement appeared unlikely, parties’ focus shifted to the potential for factual stipulations. TURN actively participated in the negotiation of 43 factual stipulations contained in parties’ joint motion filed on December 13, 2024, to reduce the extent of disputes before briefing. These stipulations provide value to the record and lessons learned, as highlighted below.</p> <p>In Ex. TURN-01, TURN-02, and TURN-03, TURN demonstrated that PG&E’s cost estimate for the gas pipeline project was too high because it assumed a unit cost that blended plastic pipe and steel pipe, when a lower plastic pipe unit cost should be used. TURN recommended a unit cost of \$578/mile in TURN’s Supplemental Testimony,</p>	<p><i>Adopt Stipulations, 7/18/25</i></p> <p><i>Gas Pipeline Project Costs</i></p> <ul style="list-style-type: none"> • See, e.g., Ex. TURN-03, pp. 1-3 • Joint Parties Stipulations, # 19 <p><i>Electrification Project Costs</i></p> <ul style="list-style-type: none"> • Ex. TURN-03, pp. 1-2 • Joint Parties Stipulations, # 18, 20 <p><i>Cost Cap</i></p> <ul style="list-style-type: none"> • Ex. TURN-01, p. 8; Ex. TURN-02, pp. 4-5; Ex. TURN-03, p. 1 • Joint Parties Stipulations, # 30 <p><i>Electrification Project Cost-Effectiveness Evaluation</i></p> <ul style="list-style-type: none"> • Ex. TURN-01, pp. 1-2; TURN-02, pp. 2-4 <p><i>Data Collection and Reporting</i></p>	<p>Verified</p> <p>Verified</p> <p>Verified</p> <p>Verified</p>
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<p>which PG&E ultimately stipulated to in the Joint Parties Stipulations.</p> <p>TURN also called into question PG&E’s cost estimate for the electrification project in Ex. TURN-03. PG&E modified its electrification cost estimate several times, and ultimately, PG&E stipulated to there being significant uncertainty in the cost estimate.</p> <p>In Ex. TURN-01, TURN-02, and TURN-03, TURN recommended a project cost cap tied to TURN’s cost estimate for the gas pipeline replacement program, to ensure ratepayer neutrality from the electrification project, with any additional costs funded through the site owner. TURN’s final cost cap was \$12.6 million, based on a \$578/mile unit cost. PG&E ultimately stipulated to an even lower cost cap of \$11.267 million, based on its final electrification cost estimate, signaling PG&E’s willingness to be bound by its estimate, despite uncertainties.</p> <p>In Ex. TURN-01 and Ex. TURN-02, TURN addressed PG&E’s methodology for determining electrification project cost-effectiveness. TURN raised concerns with PG&E’s NPV analysis and also agreed with other intervenors that a PVRR analysis most closely reflects the project impact on utility ratepayers. Parties were unable to reach consensus on the best methodology for assessing electrification project cost-effectiveness, a cautionary tale for future zonal electrification projects.</p> <p>In Ex. TURN-01, Ex. TURN-02, and Ex. TURN-03, TURN addressed the importance of meaningful data collection and reporting to inform future</p>	<ul style="list-style-type: none"> • Ex. TURN-01, p. 2; Ex. TURN-02, p. 6; Ex. TURN-03, pp. 2, 8 • Joint Parties Stipulations #40, 42 (data collection and reporting requirements); #37-39 (indoor air quality monitoring) <p><i>Cost Recovery</i></p> <ul style="list-style-type: none"> • TURN Protest, pp. 3, 6-7; Ex. TURN-01, pp. 7-16; Ex TURN-02, pp. 5-6; Ex. TURN-03, pp. 7-8 	<p>Verified</p> <p>Verified</p> <p>Verified</p>
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<p>zonal electrification projects. TURN specifically urged the inclusion of pre- and post-electrification participant bill impacts. TURN also supported calls by other intervenors for indoor air quality monitoring, but cautioned that such monitoring should be conducted by a qualified environmental consulting firm and paid for through PG&E's RD&D funds or third-party funding. PG&E ultimately agreed to collect many data points recommended by intervenors, including bill impacts, for inclusion in a Final Project Report. PG&E also agreed to propose the use of \$50,000 in RD&D funding for third-party indoor air quality monitoring and seek contributions to cost from third parties. These efforts by TURN and other parties to develop data collection and reporting requirements can benefit future zonal electrification projects.</p> <p>The most contentious issue in this proceeding was cost recovery, which offers a lesson in itself. TURN demonstrated in its protest and all three volumes of testimony why the Commission should reject PG&E's request for regulatory asset treatment for behind-the-meter (BTM) project costs on a policy basis. TURN also provided analysis comparing the impact on ratepayers of treating BTM costs as O&M expense versus a regulatory asset, which showed better electrification project economics without regulatory asset treatment. Parties did not reach agreement on cost recovery issues, which underscores the importance of Commission resolution of this issue to allow stakeholders to focus on other aspect of zonal electrification in the future.</p>		
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<p>The Commission recently recounted the California Court of Appeal’s interpretation of the intervenor compensation statutes in <i>New Cingular Wireless II</i>. As the Commission explained in D.25-12-045:</p> <p>“The <i>New Cingular Wireless II</i> court states that to show a substantial contribution: “[B]y the plain terms of the statute there must be some demonstrable link between a position the intervenor took and a specific ‘order or decision’ adopted by the CPUC.” (<i>New Cingular Wireless II</i>, supra, 21 Cal.App.5th at 1203.) The Public Utilities Code thus provides for compensation where the intervenor made a substantial contribution, in whole or in part, to the Commission’s order or decision (section 1803(a)). <i>New Cingular Wireless I</i> states that awards may be made based on procedural recommendations as well. (<i>New Cingular Wireless I</i>, supra, 246 Cal.App.4th at 819.)” [D.25-12-045, p. 4]</p> <p>TURN submits that TURN’s analysis and recommendations, coupled with the Joint Parties Stipulations, highlighted above, contributed to the rich record in this proceeding that led the Commission to order in D.25-11-004 that this record be made available for future related proceedings, and the lessons learned by PG&E and other parties be memorialized through a formally filed Lessons Learned report. The Commission should accordingly find a demonstrable link between TURN’s work and the Commission’s orders in D.25-11-004.</p>		
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor’s Assertion	CPUC Discussion
a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?	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: Indicated Shippers		Verified
d. Intervenor’s claim of non-duplication:		
<p>Cal Advocates was much less active than TURN in this proceeding. Whereas TURN submitted three volumes of testimony, Cal Advocates offered a single volume, four pages long. Further, there was no overlap between Cal Advocates’ recommendations and TURN’s. Cal Advocates challenged PG&E’s cost allocation entirely to gas customers; recommended a debt rate of return on PG&E’s proposed regulatory asset; and suggested the addition of a stakeholder input process. TURN did not oppose allocating costs to gas ratepayers if cost-effective; opposed regulatory asset treatment; and was silent on stakeholder participation.</p> <p>Indicated Shippers, like TURN, challenged PG&E’s cost-effectiveness calculations and the proposed project ratemaking. However, TURN and Indicated Shippers offered complementary analyses on these issues. TURN offered a lower cost cap than Indicated Shippers based on TURN’s unique analysis of a reasonable estimate for the gas pipeline project. TURN focused on issues with PG&E’s NPV analysis, whereas Indicated Shippers provided a PVRP analysis to determine project cost-effectiveness. TURN supported cost recovery from gas ratepayers if the project was cost-effective (which would be achieved through a cost cap), while Indicated Shippers maintained that gas ratepayers should not pay for the CSU Monterey Bay project.</p> <p>For these reasons, TURN submits that the Commission should find no undue duplication between TURN’s participation and that of other parties.</p>		Noted

PART III: REASONABLENESS OF REQUESTED COMPENSATION
A. General Claim of Reasonableness (§ 1801 and § 1806)

	CPUC Discussion
<p>a. Intervenor’s claim of cost reasonableness:</p> <p>This request seeks an award of \$133,691.88 as the reasonable cost of our participation in this important proceeding. These costs are reasonable in light of the quality of TURN’s work and TURN’s contributions to this proceeding and the final decision, as document above. Further, as explained in Part III.b below, TURN has voluntarily excluded more than 100 hours of attorney and expert time that TURN devoted to this proceeding in order to keep costs reasonable under the circumstances here, where PG&E withdrew its application before the completion of litigation. TURN submits that the Commission should conclude that TURN’s request is reasonable.</p>	<p>Noted</p>
<p>b. Reasonableness of hours claimed:</p> <p>TURN requests compensation for approximately 260 hours of attorney and expert time, which covers TURN’s very active participation in this multi-year proceeding. TURN analyzed PG&E’s initial application and testimony and prepared a protest. TURN further analyzed PG&E’s amended testimony required by the Scoping Memo. Then TURN prepared Intervenor and Rebuttal Testimony on 2/17/23 and 3/17/23, respectively. Following PG&E’s restart of this proceeding after a year-long hiatus, TURN analyzed PG&E’s new agreement with CSUMB and supplemental testimony. TURN then submitted Supplemental Intervenor Testimony on 9/30/24, conducted discovery based on PG&E’s rebuttal, participated in further settlement negotiations which resulted in factual stipulations, and otherwise prepared for evidentiary hearings and briefing before PG&E’s decision to seek withdrawal of this application in early January 2025, just days before opening briefs were due.</p> <p>Over the course of this proceeding, TURN experienced a remarkable amount of staff turnover, which impacted staffing of this proceeding and TURN’s hours.</p> <p>TURN Attorneys: TURN initially assigned senior Staff Attorney Marcel Hawiger to work with more junior Staff Attorney Camille Stough. However, Ms. Stough decided to seek employment elsewhere in the fall of 2022. With Ms. Stough’s departure, TURN assigned junior Staff Attorney Marna Paintsil Anning to work with Mr. Hawiger. Ms. Anning also left TURN during the pendency of this proceeding. While at the helm, Mr. Hawiger prepared TURN’s Testimony and Rebuttal Testimony in 2023.</p>	<p>Noted</p>

				CPUC Discussion								
<p>Then Mr. Hawiger left TURN in April 2023 (and subsequently returned, but that history does not impact this claim), around the time that PG&E sought suspension of the schedule. When the proceeding restarted in 2024, TURN assigned Legal Director Thomas Long to lead TURN’s work. Finally, Mr. Long handed this case over to TURN Managing Attorney Hayley Goodson in the fall of 2024 as a matter of reallocating workload. Ms. Goodson saw this proceeding through its surprising and eventful conclusion.</p> <p>TURN Analysts: From the outset of this proceeding, TURN’s various attorneys were assisted by experts, particularly in evaluating PG&E’s cost-effectiveness claims regarding the proposed CSUMB electrification project and otherwise in assessing ratepayer impacts associated with PG&E’s proposals. TURN Energy Policy Analyst Jennifer Dowdell provided in-house support. TURN also received early support from Jalal Awan, who was an outside consultant to TURN at the beginning of this proceeding. Mr. Awan joined TURN’s staff as an Energy & Climate Policy Analyst in late 2023. When Mr. Hawiger left TURN, Mr. Awan assumed the role of TURN’s expert witness and prepared TURN’s Supplemental Intervenor Testimony. Mr. Awan continued to assist TURN’s attorneys in participating in settlement negotiations and preparing for briefing, which TURN very reasonably assumed would take place according to the adopted procedural schedule.</p> <p>Voluntary Reduction in Hours: Understandably, TURN’s timesheets included a significant amount of time associated with transitions in staffing. Given this, as well as the proceeding’s sudden conclusion without briefing, TURN has voluntarily removed more than 100 hours of attorney and expert time from this claim. TURN submits that the remaining hours are fully reasonable in light of the substantial contributions TURN made in this proceeding and the circumstances here.</p>												
<p>c. Allocation of hours by issue:</p> <p>The following codes relate to the issue and activity areas addressed by TURN in this proceeding.</p> <table border="1"> <thead> <tr> <th>Code</th> <th>Description</th> <th>Allocation of Time</th> <th>Hours</th> </tr> </thead> <tbody> <tr> <td>Brief</td> <td>Work related to the common briefing outline required by the Commission</td> <td>0.51%</td> <td>1.25</td> </tr> </tbody> </table>				Code	Description	Allocation of Time	Hours	Brief	Work related to the common briefing outline required by the Commission	0.51%	1.25	Noted
Code	Description	Allocation of Time	Hours									
Brief	Work related to the common briefing outline required by the Commission	0.51%	1.25									

				CPUC Discussion
CE	Work related to evaluating the cost-effectiveness of the CSUMB electrification project relative to the alternative gas pipeline replacement project, including cost assumptions and valuation methodologies, like NPV and PVRR	28.92%	71.00	
Coord	Work related to external coordination with other parties to inform TURN's efficient and effective participation	2.44%	6.00	
CR	Work related to evaluating PG&E's cost recovery proposals, particularly regulatory asset treatment for behind-the-meter costs instead of O&M expense treatment	6.42%	15.75	
GP	General work necessary for participation that cannot be allocated by issue	6.62%	16.25	
LLR	Work related to the Lessons Learned report ordered by D.25-11-004	2.44%	6.00	
PD	Work related to the PD preceding D.25-11-023	0.71%	1.75	
Pipe	Work related to PG&E's gas pipeline replacement project that could be avoided by the CSUMB electrification project	3.67%	9.00	
Proc	Review of CPUC rulings and time spent preparing for, and participating in the Prehearing Conference, required	3.16%	7.75	

				CPUC Discussion
	Meet & Confers and Status Conferences			
Restart	Work necessitated by PG&E's request to suspend the procedural schedule pending further negotiations with CSUMB	6.01%	14.75	
Sett	Work related to settlement negotiations and the joint parties' factual stipulations filed with the Commission	13.03%	32.00	
Test	Work related to TURN's testimony that cannot be accurately allocated to one of the specific issue areas, as well as reviewing other parties' testimony	15.38%	37.75	
Withdraw	Work related to PG&E's decision to withdraw its application	10.69%	26.25	
SUBTOTAL	(excluding compensation-related time)	100.00%	245.50	
Comp	Work related to preparing TURN's notice of intent to claim compensation and this request for intervenor compensation.		15.25	
TOTAL			260.75	
<p>TURN submits that under the circumstances this information should suffice to address the allocation requirement under the Commission's rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.</p>				

B. Specific Claim:

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Camille Stough, TURN Attorney	2022	11.75	\$380.00	D.23-10-017	\$4,465.00	11.75	\$380.00 [1]	\$4,465.00
Elise Torres, TURN Attorney	2023	1.25	\$510.00	D.24-01-045	\$637.50	1.25	\$510.00 [2]	\$637.50
Hayley Goodson, TURN Attorney	2024	14.00	\$680.00	D.24-09-017	\$9,520.00	14.00	\$680.00	\$9,520.00
Hayley Goodson, TURN Attorney	2025	17.50	\$705.00	D.25-07-034	\$12,337.50	17.50	\$705.00	\$12,337.50
Hayley Goodson, TURN Attorney	2026	2.25	\$730.00	See Comment #1	\$1,642.50	2.25	\$730.00 [3]	\$1,642.50
Jalal Awan, TURN Energy Policy Analyst	2024	92.25	\$325.00	See Comment #3	\$29,981.25	92.25	\$325.00 [4]	\$29,981.25
Jalal Awan, TURN Energy Policy Analyst	2025	11.75	\$355.00	See Comment #3	\$4,171.25	11.75	\$355.00 [4]	\$4,171.25
Jalal Awan, TURN Energy Policy Analyst	2026	2.50	\$365.00	See Comment #3	\$912.50	2.50	\$365.00 [4]	\$912.50
Jennifer Dowdell, TURN Energy Policy Expert	2022	4.00	\$415.00	D.23-04-022	\$1,660.00	4.00	\$415.00	\$1,660.00
Marcel Hawiger,	2022	20.25	\$670.00	D.23-03-042	\$13,567.50	20.25	\$670.00	\$13,567.50

CLAIMED						CPUC AWARD		
TURN Attorney								
Marcel Hawiger, TURN Attorney	2023	35.50	\$735.00	D.23-10-017	\$26,092.50	35.50	\$735.00	\$26,092.50
Consultant - Marcel Hawiger	2026	1.25	\$250.00	Consultant billed rate. See Comment #2	\$312.50	1.25	\$250.00 [7,11]	\$312.50
Marna Paintsil Anning, TURN Attorney	2022	6.00	\$275.00	D.23-11-120	\$1,650.00	6.00	\$275.00	\$1,650.00
Robert Finkelstein, TURN General Counsel	2022	2.25	\$805.00	D.23-04-022	\$1,811.25	2.25	\$805.00	\$1,811.25
Robert Finkelstein, TURN General Counsel	2023	0.50	\$840.00	D.24-02-040	\$420.00	0.50	\$840.00 [9]	\$420.00
Thomas J. Long, TURN Director of Legal Strategy	2024	22.50	\$860.00	D.24-09-016	\$19,350.00	22.50	\$860.00 [10]	\$19,350.00
Subtotal: \$128,531.25						Subtotal: \$128,531.25		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Hayley Goodson, TURN Attorney	2026	13.25	\$365.00	50% of 2026 Rate; See Comment #1	\$4,836.25	13.25	\$365.00	\$4,836.25
Marcel Hawiger, TURN Attorney	2022	0.25	\$335.00	50% of 2022 Rate	\$83.75	0.25	\$335.00	\$83.75
Marna Paintsil Anning, TURN Attorney	2022	1.75	\$137.50	50% of 2022 Rate	\$240.63	1.75	\$137.50	\$240.63

CLAIMED	CPUC AWARD
<i>Subtotal: \$5,160.63</i>	<i>Subtotal: \$5,160.63</i>
<i>TOTAL REQUEST: \$133,691.88</i>	<i>TOTAL AWARD: \$133,691.88</i>

*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 ²	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Camille Stough	June 2016	309555	No
Elise Torres	December 2011	280443	No
Hayley Goodson	December 2003	228535	No
Marcel Hawiger	January 1998	194244	No
Marna Paintsil Anning	December 2021	339228	No
Robert Finkelstein	June 1990	146391	No
Thomas Long	December 1986	124776	No

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

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Timesheets for TURN Attorneys/Experts
Attachment 3	TURN hours allocated by issue
Attachment 4	TURN Feedback on PG&E Draft Lessons Learned Report
Attachment 5	Retainer Agreement with Consultant Marcel Hawiger for 2026 Work

² This information may be obtained through the State Bar of California’s website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

³ Attachments not attached to final Decision

Attachment or Comment #	Description/Comment
Comment #1	<p>2026 Rate for Hayley Goodson</p> <p>TURN requests an hourly rate of \$730 for TURN Attorney Hayley Goodson in 2026. The requested rate is equal to the rate authorized by the Commission in D.25-07-034 for Ms. Goodson’s work in 2025, \$705, adjusted by an estimated escalation rate of 3.3% for 2026.</p> <p>Calculation: $\\$705 \times [1.033 \text{ (est. COLA)}] = \\728.27, rounded to \$730</p> <p>TURN uses an estimated escalation rate of 3.3% because it is the percentage change in the Bureau of Labor Statistics Employment Cost Index (ECI), Table 5, for the Occupational Group “Management, Professional, and Related excluding Incentive Paid Occupations” for the 12-months ended Sept. 2025, which is the latest information available to TURN. TURN asks the Commission to apply the adopted escalation rate in determining Ms. Goodson’s 2026 hourly rate.</p>
Comment #2	<p>2026 Rate for TURN Consultant Marcel Hawiger</p> <p>Marcel Hawiger was employed by TURN as a Staff Attorney for the majority of time he worked on this proceeding. However, in mid-December 2025, Mr. Hawiger ended his employment with TURN. Since that time, Mr. Hawiger has begun providing consulting services to TURN at an hourly rate of \$250, which is far below the Market Rates approved by the Commission for his work as a TURN Staff Attorney over many years.</p> <p>This request for compensation includes 1.25 hours of Mr. Hawiger’s time in January 2026, preparing feedback on PG&E’s draft Lessons Learned report to include in TURN’s submission to PG&E. TURN requests an hourly rate of \$250 for this work conducted in 2026. Attachment 5 to this claim includes the retainer agreement between TURN and Mr. Hawiger which specifies this hourly rate for work in 2026.</p>
Comment #3	<p>2024, 2025, and 2026 Hourly Rates for TURN Energy & Climate Policy Analyst Jalal Awan</p> <p>On October 27, 2025, TURN filed an Intervenor Compensation Claim in R.20-07-013 that included TURN’s first request for an hourly rate for TURN Energy Policy Analyst Jalal Awan. Mr. Awan joined TURN’s staff in November 2023. In that claim, TURN requested an hourly rate of \$325 for Mr. Awan in 2024 based on the Commission’s hourly rate range for the Public Policy Analyst – Level III labor role. TURN refers the Commission to TURN’s showing in R.20-07-013 to support the proposed 2024 rate of \$325 for Mr. Awan rather than repeat</p>

Attachment or Comment #	Description/Comment
	<p>it here. (See https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M585/K485/585485920.PDF)</p> <p>For Mr. Awan’s rate in 2025, TURN requests that the Commission adjust his 2024 rate by both (1) the annual escalation rate of 3.46% for 2025 and (2) the first 5% step increase for Mr. Awan in the Public Policy Analyst – Level III experience tier. TURN uses a 2025 rate of \$355 for Mr. Awan to prepare this claim. Calculation: $\\$325 \times [1.0346 \text{ (COLA)} + 0.05 \text{ (step increase)}] = \\352.50 rounded to \$355.</p> <p>For Mr. Awan’s rate in 2026, TURN requests that the Commission adjust his 2025 rate by the annual escalation rate adopted for 2026. To calculate this claim, TURN uses an estimated escalation rate of 3.3% for 2026, which produces a 2026 rate of \$365.</p> <p>Calculation: $\\$355 \times [1.033 \text{ (est. COLA)}] = \\366.72, rounded to \$365</p> <p>TURN uses an estimated escalation rate of 3.3% because it is the percentage change in the Bureau of Labor Statistics Employment Cost Index (ECI), Table 5, for the Occupational Group “Management, Professional, and Related excluding Incentive Paid Occupations” for the 12-months ended Sept. 2025, which is the latest information available to TURN. TURN asks the Commission to apply the adopted escalation rate in determining Mr. Awan’s 2026 hourly rate.</p>

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Camille Stough 2022 Hourly Rate	D.23-09-018 verified a 2022 hourly rate of \$380.00. We apply the same rate here.
[2] Elise Torres 2023 Hourly Rate	D.24-01-045 verified a 2023 hourly rate of \$510.00. We apply the same rate here.
[3] Hayley Goodson 2024 -2026 Hourly Rates	<p>D.24-09-017 verified a 2024 hourly rate of \$680.00. We apply the same rate here.</p> <p>D.25-07-034 verified a 2025 hourly rate of \$705.00. We apply the same rate here.</p>

Item	Reason
	<p>For 2026, TURN requested the adopted 2025 hourly rate and application of the 2026 escalation factor. Using our calculation methodology, based on the approved 2025 rate of \$705.00, application of the 2026 escalation factor of 3.35% and rounding to the nearest \$5 increment, we find:</p> <p>2026: $\\$705.00 \times 1.0335 = \\730.00</p> <p>We find the 2026 hourly rate of \$730.00 reasonable and adopt it here. Intervenor Compensation Claim Preparation is rated at ½ preparer’s normal rate, bringing the 2026 claim preparation to \$365.00.</p>
<p>[4] Jalal Awan 2024 – 2026 Hourly Rate</p>	<p>Awan previously served TURN as a consultant but joined TURN as staff in 2023. TURN requests a 2024 rate of \$325.00 for Awan as a Turn staff member in the role of Expert – Public Policy Analyst Level III.</p> <p>Awan began work for TURN in November 2023 as an Energy and Climate Policy Analyst after working for RAND Corporation as an Assistant Policy Analyst from September 2017 to October 2023, giving them approximately six years of work experience as a policy analyst. While working for TURN, Awan has sponsored testimonies for various proceedings which protected ratepayer interests. Additionally, Awan graduated from Rand School of Public Policy with a Ph.D. in Public Policy Analysis in 2023, USC with a M.S. in Energy Systems in 2015, and earned a B.E. in Electrical Engineering from The University of Lahore in 2010.</p> <p>For 2024, Resolution ALJ-393 lists a range of \$272.21 - \$477.73 for Public Policy Analyst - Level III with 5 -10 years’ experience, with the median range being \$371.11. Given Awan’s work experience and educational background, an hourly rate of \$325.00 for 2024 is found to be reasonable and adopted here.</p> <p>For 2025, using our calculation methodology, using the 2024 rate of \$325.00 adopted above, application of the 2025 escalation factor of 3.46%, application of the first available 5% step-increase, and rounding to the nearest allowable \$5 increment, we find:</p> <p>2025: $\\$325.00 \times 1.0846 = \\355.00</p> <p>We find the requested 2025 hourly rate of \$355.00 reasonable and adopt it here. For 2026, based on the adopted 2025 rate of \$355.00, application of the 3.35% escalation factor and rounding to the nearest \$5 increment, we find:</p> <p>2026: $\\$355.00 \times 1.0335 = \\365.00</p> <p>We find the 2026 hourly rate of \$365.00 reasonable and adopt it here.</p>

Item	Reason
[5] Jennifer Dowdell 2022 Hourly Rate	D.23-04-022 verified a 2022 hourly rate of \$415.00. We apply the same rate here.
[6] Marcel Hawiger 2022 and 2023 Hourly Rate	<p>D.23-03-042 verified a 2022 hourly rate of \$670.00. We apply the same rate here.</p> <p>D.23-10-017 verified a 2023 hourly rate of \$735.00. We apply the same rate here.</p> <p>Intervenor Compensation Claim Preparation is rated at ½ preparer’s normal rate, bringing the 2022 claim preparation rate to \$335.00.</p> <p>We confirm Marcel Hawiger served as a consultant to TURN beginning May 2023 to December 2024 and the hours claimed in 2023 end April 2023, therefore awarded non-consultant rates.</p>
[7] Marcel Hawiger 2026 Consultant Rate	<p>TURN has confirmed that Marcel Hawiger 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 level⁴. 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>TURN has confirmed that it paid Marcel Hawiger \$250.00 per hour for work in this proceeding. We find this rate reasonable given Marcel Hawiger’s experience, and approve this rate here.</p> <p>The award determined herein for Marcel Hawiger’s contribution in this proceeding shall be paid in full to Marcel Hawiger, and no portion of this part of the award shall be kept by TURN. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission’s policy on consultant compensation.</p>
[8] Marna Paintsil Anning 2022 Hourly Rates	<p>D.23-11-120 verified a 2022 hourly rate of \$375.00. We apply the same rate here.</p> <p>Intervenor Compensation Claim Preparation is rated at ½ preparer’s normal rate, bringing the 2022 claim preparation rate to \$137.50.</p>
[9] Robert Finkelstein	D.23-04-022 verified a 2022 hourly rate of \$805.00. We apply the same rate here.

⁴ D.07-01-009, D.08-04-010, and Resolution ALJ-235.

Item	Reason
2022 and 2023 Hourly Rates	D.24-03-036 verified a 2023 hourly rate of \$840.00. We apply the same rate here.
[10] Thomas Long 2024 Hourly Rate	D.26-02-022 verified a 2024 hourly rate of \$860.00. We apply the same rate here.
[11] Intervenor Responsibility for Transparency and Accuracy in Compensation Requests	<p>The Commission takes this opportunity to remind all intervenors that they bear the burden of providing accurate, complete, and honest information in all compensation requests. The Commission relies on intervenors' good faith representations, particularly regarding consultant agreements and payments, as it does not have the resources to review every contract or non-standard arrangement in detail.</p> <p>Intervenor compensation is funded by ratepayers, and the Commission takes seriously any effort to mislead or obscure the financial basis for a claim. Although no violation of Rule 1.1 has been found in this instance, we remind intervenors that under Rule 1.1, intent to deceive is not required for a violation, misstatements may still be actionable. Dishonest or misleading claims not only risk denial of compensation but may also subject the intervenor to penalties.</p> <p>The Commission has clear authority to audit intervenors' books and records to verify the basis for any award. Intervenor must therefore ensure full transparency regarding actual time spent on issues, consultant fees, payment arrangements, and the actual disbursement of funds. Failure to meet this obligation undermines the integrity of the compensation process and may lead to denial of claims or further enforcement action</p>

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

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

- The Utility Reform Network has made a substantial contribution to D.25-11-004.

2. The requested hourly rates for The Utility Reform Network’s representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services, and/or reflect the actual rates billed to, and paid by the intervenor, for consultant services rendered. The claimed costs and expenses are reasonable and commensurate with the work performed.
3. The total of reasonable compensation is \$133,691.88.

CONCLUSION OF LAW

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

ORDER

1. The Utility Reform Network is awarded \$133,691.88.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company shall pay The Utility Reform Network the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning April 8, 2026, the 75th day after the filing of The Utility Reform Network’s request, and continuing until full payment is made.
3. The comment period for today’s decision is waived.

This decision is effective today.

Dated 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:	D2606028	Modifies Decision?	No
Contribution Decision(s):	D2511004		
Proceeding(s):	A2208003		
Author:	ALJ Watts-Zagha		
Payer(s):	Pacific Gas and Electric Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	1/23/26	\$133,691.88	\$133,691.88	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
Camille	Stough	Attorney	\$380.00	2022	\$380.00
Elise	Torres	Attorney	\$510.00	2023	\$510.00
Hayley	Goodson	Attorney	\$680.00	2024	\$680.00
Hayley	Goodson	Attorney	\$705.00	2025	\$705.00
Hayley	Goodson	Attorney	\$730.00	2026	\$730.00
Marcel	Hawiger	Attorney	\$670.00	2022	\$670.00
Marcel	Hawiger	Attorney	\$735.00	2023	\$735.00
Marcel	Hawiger	Attorney - Consultant	\$250.00	2026	\$250.00
Marna	Paintsil Anning	Attorney	\$275.00	2022	\$275.00
Robert	Finkelstein	Attorney	\$805.00	2022	\$805.00
Robert	Finkelstein	Attorney	\$840.00	2023	\$840.00
Thomas	Long	Attorney	\$860.00	2024	\$860.00
Jennifer	Dowdell	Expert	\$415.00	2022	\$415.00

Jalal	Awan	Expert	\$325.00	2024	\$325.00
Jalal	Awan	Expert	\$355.00	2025	\$355.00
Jalal	Awan	Expert	\$365.00	2026	\$365.00

(END OF APPENDIX)