

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of San Diego Gas & Electric Company (U 902-E) for Authority to Establish a Ratemaking Mechanism for Energization Projects Pursuant to Senate Bill 410.

A.25-04-015
(Filed April 25, 2025)

**DECISION GRANTING COMPENSATION TO
SMALL BUSINESS UTILITY ADVOCATES
FOR SUBSTANTIAL CONTRIBUTION TO DECISION (D.) 25-10-034**

Intervenor: Small Business Utility Advocates	For contribution to Decision (D.) 25-10-034
Claimed: \$25,413.50	Awarded: \$19,435.60
Assigned Commissioner: Matthew Baker	Assigned ALJ: Andrew Dugowson

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	Decision 25-10-034 approved San Diego Gas & Electric Company's (SDG&E) application for a ratemaking mechanism for energization projects pursuant to Senate Bill 410.
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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:	06/02/2025	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	07/01/2025	Verified
4. Was the NOI timely filed?		Yes

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

	Intervenor	CPUC Verification
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.23-10-001	Verified
6. Date of ALJ ruling:	06/03/2024	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.23-10-001	Verified
10. Date of ALJ ruling:	06/03/2024	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.25-10-034	Verified
14. Date of issuance of Final Order or Decision:	11/7/2025	Verified
15. File date of compensation request:	January 6, 2026	Verified
16. Was the request for compensation timely?		Yes

PART II: SUBSTANTIAL CONTRIBUTION

A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059):

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>1. Necessity for Reasonableness Review</p> <p>Contrary to SDG&E’s interpretation, SBUA argued that the Commission must conduct a level of reasonableness review prior to allowing SDG&E to record costs in the SB 410 memorandum account for interim rate recovery. (SBUA Opening</p>	<p>The Decision rejected SDG&E’s position and agreed with SBUA that despite recorded costs being subject to after-the-fact reasonableness review, the Commission must scrutinize the justifications for proposed costs and cost levels prior</p>	<p>Verified</p>

<p>Brief (OB) at 4-5; SBUA Reply Brief (RB) at 2-3; SBUA Opening Comments on Proposed Decision (OC) at 2-3; SBUA Reply Comments on Proposed Decision (RC) at 3.) SBUA further emphasized that SDG&E’s application lacked essential detail to satisfy such review and its forecast of rapid increase in spending was not consistent with historical spending, did not demonstrate a capacity to anticipate where investment would be efficiently deployed and nor did it take into consideration the elimination of federal electric vehicle-related subsidies and uncertainty in California’s economic outlook. (SBUA-01 at 4-7; OB at 5-6; RB at 3-4; RC at 2.)</p>	<p>to authorizing SDG&E to record such costs and obtain interim recovery. (Decision at 7, 55 (“SBUA notes, it is appropriate to apply <i>some</i> level of scrutiny to SDG&E’s application.”).) The Decision also reflects SBUA’s objections to the sufficiency of SDG&E’s factual justifications for the cost forecasts. (<i>See, e.g., Id.</i> at 7; FOF 18 (“SDG&E has not justified adopting a cost forecast with such sudden, sharp increases.”).)</p>	
<p>2. Denial of Miscellaneous Category Costs</p> <p>SBUA argued that “miscellaneous” costs were not defined or justified, did not comply with the requirements of SB 410 and should be disallowed. (SBUA-01 at 8; OB at 8.)</p>	<p>As argued by SBUA, the Commission rejected SDG&E’s request for “miscellaneous” costs. (Decision at 44; <i>see also</i> FOF No. 28; COL No. 21).</p>	<p>Verified</p>
<p>3. Denial of IT Costs</p> <p>SBUA presented testimony, briefing and comments in opposition to recording SDG&E’s proposed IT costs on account of the application lacking sufficient cost detail and justification of need to implement electrification projects. (SBUA-01 at 7-8; OB at 7; RB at 4-5; RC at 3.)</p>	<p>The Decision identified SBUA’s arguments supporting the Commission’s determination to deny all of SDG&E’s IT costs:</p> <p style="padding-left: 40px;">SBUA argues that SDG&E’s IT requests are underdeveloped and are a “black box.”[fn] SBUA alleges that when SDG&E states that “not all detailed requirements for Nexus have been developed at this time,” the Commission is required to extend trust to SDG&E that whatever product SDG&E ultimately purchases or</p>	<p>Verified. We note that the identified arguments belonged to UCAN; the citation in the Decision at 42 was a misattribution.</p>

	<p>develops will be useful, support energization, and otherwise appropriate to include in the SB 410 cap.</p> <p>(Decision at 42; <i>see also</i> p. 43.)</p> <p>The Decision denied all of SDG&E’s request for \$52.682 million in IT costs. (<i>Id.</i> at 3; FOF No. 26; COL No. 19.)</p>	
<p>4. Interpretation of SB 410 Annual Cap</p> <p>SDG&E’s request that: “For 2025 and 2026, SDG&E recommends the cap for each year be set equal to the highest forecasted year (2026), with the condition that any unused cap in 2025 be added to 2026’s cap. In other words, the cap for 2025 would be set at \$144,631,000 and the cap for 2026 would be \$144,631,000 <i>plus</i> any unused portion of the 2025 cap.” (SDGE-02 at 7.) However, SB 410 expressly “[r]equires the commission to establish an up-front annual cap on the amount that each electrical corporation can recover within the mechanism.” (Pub. Util. Code § 931(b)(2).) As a result, SBUA argued that allowing roll-over is inconsistent with the requirement of an “annual cap” and that the annual cap be set based on the forecast for that specific year. (SBUA-01 at 9-10; OB at 8-9.)</p>	<p>The Decision noted SBUA’s interpretation of “annual cap” and declined to adopt it, instead allowing SDG&E to roll over unused amounts from 2025 to 2026 but limited roll over to costs within each subcategory. (Decision at 48.) Additionally, the Decision rejected SDG&E’s request to set caps based on the highest year.</p> <p>SBUA submits that its analysis was appropriate and beneficial to the record in light of the language of SB 410 and SDG&E’s unreasonable interpretation of “caps” to allow maximum spending each year.</p>	<p>Verified</p>

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

	Intervenor’s Assertion	CPUC Discussion
<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>Verified</p>
<p>b. Were there other parties to the proceeding with positions similar to yours?</p>	<p>Yes.</p>	<p>Verified</p>

<p>c. If so, provide name of other parties: Cal Advocates, TURN and UCAN. (SBUA generally opposed the positions of SDG&E and CUE.)</p>	<p>Noted</p>
<p>d. Intervenor’s claim of non-duplication:</p> <p>SBUA took independent positions on issues and provided distinct analysis on numerous issues and provided independent opinions, evidence and arguments. In particular, SBUA provided distinct factual information regarding federal policy and economic changes that call into question the accuracy of SDG&E’s forecast, with a particular emphasis on establishing the correct interpretation of SB 410 and reasonableness review standards. The Decision recognizes SBUA’s contribution.</p>	<p>We note that there were instances of internal duplication in SBUA’s efforts. <i>See</i> Part III.D [1].</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:</p> <p>SBUA participated in the proceeding by attending the prehearing conference, submitting opening testimony and filing opening and reply briefs, and submitting opening and reply comments on the proposed decision. SBUA’s comments also corrected an error in the proposed decision. (<i>See</i>, OC at 3; redline of final decision at 10.)</p> <p>SBUA’s involvement significantly improved the record and outcome of the proceedings both quantitatively and qualitatively. On the financial side, SBUA’s participation in this regard helped to save ratepayers millions of dollars by supporting critical Commission review of costs that could be recorded in SDG&E’s memorandum account and the denial of SDG&E’s \$52.682 million in IT cost category.</p> <p>On a qualitative level, SBUA’s contributions identified in the decisions include, among other things: establishing an interpretation of SB 410 that requires reasonableness review of a utility’s requested annual cost that can be recovered from rates on an interim basis, protecting customers from rate shock and suffering from unreasonably high rates and prohibiting utilities from padding estimates with “miscellaneous” costs.</p> <p>SBUA’s participation was focused and the compensation request seeks an award of \$25,413.50 for approximately 60.8 hours of work, excluding compensation related time. This amount is reasonable in light of SBUA’s significant contribution to achieving significant cost savings in this proceeding and supporting the creation of important precedent for future SB 410 applications. SBUA’s contribution was substantial and justified</p>	<p>We note that SBUA’s opening comments do not appear on the A.25-04-015 Docket Card. After the adjustments made to this claim, the remainder of the claimed costs are reasonable. <i>See</i> Part III.D CPUC Comments, Disallowances, and Adjustments [1].</p> <p>According to SBUA’s timesheets, SBUA’s work excluding compensation time</p>

	CPUC Discussion
<p>SBUA’s hours on behalf of an underrepresented class of hundreds of thousands of small business ratepayers served by SDG&E. For these reasons, the Commission should find that SBUA’s efforts have been valuable and approve the request for fees.</p>	<p>was 45.8 hours, not 60.8 hours.</p>
<p>b. Reasonableness of hours claimed:</p> <p>SBUA relied on a strategic team of attorneys and experts for its advocacy related to this compensation request. These hourly amounts are reasonable given the demands of this proceeding and time required to participate.</p> <p>SBUA assigned primary responsibility for the proceeding to mid/senior-level attorney, Ariel Strauss who has represented SBUA in many energy-related proceedings and who handled review, analysis, briefing, and comments on the proposed decision.</p> <p>Matt Sheriff, an outside consultant for SBUA at Palo Verdes Advisors, LLC, provided data analysis and sponsored SBUA’s testimony. Mr. Sheriff has over seventeen years of experience as an analyst at Southern California Edison. His resume is included as <u>Attachment #3</u>. The Contract Agreement between Mr. Sheriff and SBUA is included as <u>Attachment #4</u>.</p> <p>SBUA’s General Counsel, James Birkelund, provided high-level strategic direction and critical feedback, leveraging his expertise to refine SBUA’s litigation positions while managing work efforts. His oversight ensured that SBUA’s involvement was focused, impactful, and aligned with the organization’s mission to advocate for small business interests. Mr. Birkelund and Mr. Strauss are employed by E&E Law Corp. (E&E Law), which represents SBUA in this matter on a contingency basis at prevailing market rates. <i>See Attachment #5</i> (attorney-client agreement, filed under seal); <i>Attachment #6</i> (Statement of Work reflecting requested hourly rates). The Commission has previously approved SBUA’s use of outside counsel at market rates. <i>See, e.g., D.25-05-023; D.25-05-021; D.25-03-029; D.25-04-012; and D.25-02-025.</i></p> <p>The coordinated approach between professionals enabled SBUA to submit high quality work product while maintaining a cost-effective and efficient legal strategy. SBUA also has weekly strategy meetings with outside counsel and in-house employees regarding litigation cases.</p> <p>SBUA submits that it made significant contributions to the proceeding and all of the recorded hours claimed were justifiably and efficiently expended given the level of effort required to participate in this case.</p>	<p>After the adjustments made to this claim, the remainder of the claimed hours are reasonable. <i>See Part III.D CPUC Comments, Disallowances, and Adjustments [1].</i></p>

	CPUC Discussion
<p>c. Allocation of hours by issue:</p> <p>Allocation of hours:</p> <ol style="list-style-type: none"> 1. Reasonableness Review – 15.5 hrs. or 24.9% 2. Denial of IT Cost Category – 13.75 hrs. or 22.6% 3. Denial of Miscellaneous Cost Category – 8.25 hrs. or 13.6% 4. Definition of Annual Caps – 11.8 hrs. or 19.4% 5. Other Issues, including Cost Recovery – 9.7 hrs. or 16.0% 6. General Participation – 2.15 hrs. or 3.5%% <p>Categories 1-4 all fall within Issue 4 of the June 25, 2025, Assigned Commissioner’s Scoping Memo and Ruling.</p> <p>SBUA asserts that the categories above are well defined to allow SBUA to accurately assign hours to various tasks in its time entries. Should the Commission wish to see different information on this point or some other breakdown of SBUA’s hourly work, SBUA requests that we be so informed and provided an opportunity to supplement this request accordingly. SBUA submits that all of the hours claimed were reasonably efficiently expended and should be fully compensated.</p>	<p>The corrected allocation of hours is 14.15 hours (30.9%) for Issue 1, 11.75 hours (25.7%) for Issue 2, 5.25 hours (11.5%) for Issue 3, 7.80 hours (17.0%) for Issue 4, 4.70 hours (10.3%) for Issue 5, and 2.15 hours (4.7%) for Issue 6. The percentages do not add up to 100.0% due to rounding.</p>

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Ariel Strauss	2025	13.1	\$550	D.25-03-021 setting rate for 2024, escalated by 3.46% for 2025	\$7,205	10.62 [1]	\$520.00 [2,5]	\$5,522.40
James Birkelund	2025	9.2	\$830	D.25-07-036	\$7,636.00	7.08 [1]	\$830.00 [3,5]	\$5,876.40
Matt Sheriff	2025	23.5	\$365	See Comment #1 below.	\$8,577.50	16.82 [1]	\$365.00 [4,5]	\$6,139.30
Subtotal: \$23,418.50						Subtotal: \$17,538.10		

CLAIMED						CPUC AWARD		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
James Birkelund	2025	0.5	\$415	50% of 2025 rate.	\$207.50	0.50	\$415.00 [3,5]	\$207.50
Ariel Strauss	2025	6.5	\$275	50% of 2025 rate; see Comment #2 below.	\$1,787.50	6.50	\$260.00 [2,5]	\$1,690.00
Subtotal: \$1,995.00						Subtotal: \$1,897.50		
TOTAL REQUEST: \$25,413.50						TOTAL AWARD: \$19,435.60		

*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
Ariel S. Strauss	March 2012	282230	No
James M. Birkelund	March 2000	206328	No

C. Attachments Documenting Specific Claim and Comments on Part III:³

Attachment or Comment #	Description/Comment
Comment 1	<u>Hourly Rate for Expert Matt Sheriff</u> Pursuant to Resolution ALJ-393, SBUA requests approval of an hourly rate of \$365 for the work of expert Matt Sheriff for the period January 1, 2025 through December 31, 2025. Resolution ALJ-393 provides that an expert with more than 15 years of

² This information may be obtained through the State Bar of California’s website at <https://apps.calbar.ca.gov/attorney/LicenseeSearch/QuickSearch>.

³ Attachments not included in final Decision.

Attachment or Comment #	Description/Comment
	<p>professional experience performing complex cost estimation, financial analysis, and regulatory evaluation is appropriately classified at Level V. For 2025, the approved Level V hourly rate range for a Cost Estimation Analyst is \$284.43 (low), \$365.05 (median), and \$440.55 (high).</p> <p>Mr. Sheriff is a senior financial and regulatory policy expert with more than 25 years of professional experience, including over 17 years at Southern California Edison (SCE) and more than 10 years of direct experience supporting and sponsoring testimony in proceedings before the California Public Utilities Commission (CPUC). His work has focused extensively on cost estimation, revenue requirements, rate impacts, cost-effectiveness analysis, balancing accounts, and regulatory cost recovery—core competencies of a Cost Estimation Analyst.</p> <p>During his tenure at SCE, Mr. Sheriff spent seven years in financial analysis roles within the Treasurer’s Department, where he developed and reviewed cost-benefit analyses and financial workpapers for some of SCE’s largest capital and policy initiatives, including the San Onofre Nuclear Generating Station (SONGS) Steam Generator Replacement, the sale of the Four Corners Generating Station, and the SmartConnect (AMI 1.0) advanced metering program. His responsibilities included developing complex models for generation asset valuation, levelized cost of electricity, and revenue requirement impacts, including the effects of federal tax policy and FERC-related incentives.</p> <p>From 2014 through 2024, Mr. Sheriff held senior roles in SCE’s Regulatory Affairs organization, where he led and supported cost recovery efforts in numerous CPUC proceedings. In this capacity, he authored and sponsored testimony, prepared supporting workpapers, and provided expert analysis on revenue requirements, balancing accounts, rate impacts, cost effectiveness, and reasonableness reviews. His regulatory work spans energy storage, transportation electrification (Charge Ready), building electrification and decarbonization, wildfire mitigation and the Wildfire Fund Charge, demand response and energy efficiency, ERRA Review and Forecast proceedings, greenhouse gas allowance revenue and Climate Credit return, and securitization matters.</p> <p>Mr. Sheriff served for a decade as SCE’s lead expert for the greenhouse gas (GHG) revenue and Climate Credit return chapter, during which he developed enhanced reporting templates adopted by the Commission and the California Air Resources Board. He also developed the utility affordability reporting tool (Cost and Rate Tracker), now a required filing</p>

Attachment or Comment #	Description/Comment
	<p>for all major California investor-owned utilities and used by Commissioners to evaluate the rate impacts of proposed decisions.</p> <p>Mr. Sheriff holds a Bachelor of Arts in Political Science from the University of Maryland, Baltimore County, and an MBA in Finance from the University of Southern California’s Marshall School of Business.</p> <p>Based on these qualifications, SBUA submits that it is reasonable for the Commission to classify Mr. Sheriff as a Level V Expert (Cost Estimation Analyst) and approve a 2025 hourly rate of \$365, which represents the median of the approved Level V range and is fully supported by his education, experience, and long-standing record of expert regulatory cost analysis before the Commission.</p> <p>A copy of Mr. Sheriff’s Statement of Qualifications is included herewith as Attachment 3.</p>
Comment 2	Compensation claim preparation occurred in 2026 as well as 2025 but, for administrative convenience and efficiency, SBUA requests that such time be compensated at 2025 rates.
Attachment 1	Certificate of Service (<i>see</i> attachment under separate cover)
Attachment 2	Time Sheet Records with Allocation of Hours by Issue
Attachment 3	Statement of Qualifications for Matt Sheriff
Attachment 4	Contract Agreement with Palo Verdes Advisors, LLC
Attachment 5	Attorney-Client Agreement with E&E Law (redacted in its entirety to preserve attorney-client information; confidential version separately filed under seal)
Attachment 6	Statement of Work for E&E Law

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
<p>[1] Reductions – Limited Contribution, Duplication of Efforts, Vagueness</p>	<p><u>Limited Contribution</u></p> <p>Pursuant to Public Utilities Code § 1802(j), substantial contribution means an eligible customer “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.” In our evaluation of whether SBUA made a substantial contribution, we also consider whether the hours claimed were commensurate with the contributions made. Making a</p>

Item	Reason
	<p>substantial contribution in and of itself does not entitle an intervenor to all its claimed fees and costs. Compensation is granted for efficient, meaningful contributions.</p> <p>SBUA’s contribution to D.25-10-034 on Information Technology System Enhancements was limited. As noted in Part II.A.3 CPUC comments, D.25-10-034’s citation of SBUA’s contributions was a typographic error. Analysis of their comments related to this issue finds that SBUA often supported the positions of other parties without offering a distinct perspective or additional analysis. Although the Commission may compensate intervenors regardless of whether their positions are adopted, SBUA’s input had minimal influence on the decision-making process. The award granted herein is commensurate with that level of contribution. Given that SBUA’s contribution was limited, we reduce 50% of the claimed hours coded as “2. Denial of IT Cost Category” in their timesheets.</p> <p>We therefore find it reasonable to reduce the following hours:</p> <ul style="list-style-type: none"> • Strauss 2025: 1.20 • Birkelund 2025: 0.88 • Sheriff 2025: 3.80 <p>In Part III.A, SBUA claimed that they submitted opening comments on the proposed decision that “corrected an error in the proposed decision.” We note that SBUA’s opening comments are not on the docket for this proceeding. Although the Commission may compensate intervenors regardless of whether their positions are adopted, SBUA’s input cannot be verified so it had no influence on the decision-making process. The award granted herein is commensurate with that level of contribution. We note that 0.15 hours related to “2. Denial of IT Cost Category” in the identified timesheet entries were reduced in the above section. Given that SBUA’s contribution cannot be verified, we reduce all remaining hours associated with their opening comments on the proposed decision in their timesheets.</p> <ul style="list-style-type: none"> • Strauss 2025: 1.00 • Birkelund 2025: 0.20 <p><u>Duplication of Efforts</u></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 9.90 hours of SBUA’s claimed hours reflect a significant duplication of effort.⁴ Specifically, multiple</p>

⁴ See Birkelund’s timesheet entries: 6/2/2025, 8/11/2025, 9/8/2025, 9/30/2025 compared with Sheriff’s timesheet entries: 6/24/2025, 8/15/2025, 9/9/2025, 9/30/2025 and compared with Strauss’s timesheet entry 9/9/2025.

Item	Reason
	<p>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.</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.</p> <p>We note that 1.40 hours related to “2. Denial of IT Cost Category” in the identified timesheet entries were reduced in the above section. As a result, we reduce the claim by 4.10 hours to ensure that only reasonable and non-duplicative efforts are compensated. We therefore find it reasonable to reduce the following hours from SBUA’s work for internal duplication, broken down as follows:</p> <ul style="list-style-type: none"> • Strauss 2025: 0.18 • Birkelund 2025: 1.04 • Sheriff 2025: 2.88 <p><u>Vagueness</u></p> <p>SBUA claimed 0.10 hours on 7/1/2025 for Strauss with a description of “Email communication with JB re filings.” This entry lacks specificity as to what filings were reviewed. We therefore find it reasonable to reduce the following hours from SBUA’s work as vague:</p> <ul style="list-style-type: none"> • Strauss 2025: 0.10
[2] Ariel Strauss’s 2025 Hourly Rate and 2025 Intervenor Compensation (IComp) Preparation Rate	<p>SBUA has confirmed that Ariel Strauss is a consultant. Pursuant to the Commission’s policy, the rate requested by an intervenor must not exceed the rate billed to that intervenor by any outside consultant it hires, even if the consultant’s billed rate is below the floor for a given experience level.⁵ Per the Intervenor Compensation Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)).</p> <p>SBUA has confirmed that per the terms of their contract, Ariel Strauss has been hired on a contingency rate basis, meaning that Ariel Strauss has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Per SBUA’s statement of work, SBUA is seeking reimbursement at market rates specifically in the amount of \$520.00 per hour for Strauss in 2025. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on Ariel Strauss’s experience as an</p>

⁵ D.07-01-009, D.08-04-010, and Resolution ALJ-235.

Item	Reason
	<p>Attorney – III. Given that the 2025 rate range for Legal – Attorney – III is \$376.79 to \$586.51, we find the requested 2025 hourly rate of \$520.00 to be reasonable and we adopt it here. We take one half the requested rate for a 2025 intervenor compensation claim preparation rate of \$260.00 and we adopt it here.</p> <p>The award determined herein for Ariel Strauss’s contribution in this proceeding shall be paid in full to Ariel Strauss, and no portion of this part of the award shall be kept by SBUA. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission’s policy on consultant compensation, and the understanding that Ariel Strauss has not billed or collected compensation for the work performed until the final award is given.</p>
<p>[3] James Birkelund’s 2025 Hourly Rate and 2025 IComp Preparation Rate</p>	<p>SBUA has confirmed that James Birkelund is a consultant. Pursuant to the Commission’s policy, the rate requested by an intervenor must not exceed the rate billed to that intervenor by any outside consultant it hires, even if the consultant’s billed rate is below the floor for a given experience level.⁵ Per the Intervenor Compensation Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)).</p> <p>SBUA has confirmed that per the terms of their contract, James Birkelund has been hired on a contingency rate basis, meaning that James Birkelund has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on James Birkelund’s experience as a Legal Director – IV. Given that the 2025 rate range for Legal – Legal Director – IV is \$570.12 to \$884.24, we find the requested 2025 hourly rate of \$830.00 to be reasonable and we adopt it here. We take one half the requested rate for a 2025 intervenor compensation claim preparation rate of \$415.00 and adopt it here.</p> <p>The award determined herein for James Birkelund’s contribution in this proceeding shall be paid in full to James Birkelund, and no portion of this part of the award shall be kept by SBUA. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission’s policy on consultant compensation, and the understanding that James Birkelund has not billed or collected compensation for the work performed until the final award is given.</p>

Item	Reason
[4] Matt Sheriff's 2025 Hourly Rate	<p>SBUA has confirmed that Matt Sheriff is a consultant. Pursuant to the Commission's policy, the rate requested by an intervenor must not exceed the rate billed to that intervenor by any outside consultant it hires, even if the consultant's billed rate is below the floor for a given experience level.⁵ Per the Intervenor Compensation Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)).</p> <p>SBUA has confirmed that per the terms of their contract, Matt Sheriff has been hired on a contingency rate basis, meaning that Matt Sheriff has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on Matt Sheriff's experience as a Cost Estimation Analyst – V. Given that the 2025 rate range for Expert – Cost Estimation Analyst – V is \$284.43 to \$440.55, we find the requested 2025 hourly rate of \$365.00 to be reasonable and we adopt it here.</p> <p>The award determined herein for Matt Sheriff's contribution in this proceeding shall be paid in full to Matt Sheriff, and no portion of this part of the award shall be kept by SBUA. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission's policy on consultant compensation, and the understanding that Matt Sheriff has not billed or collected compensation for the work performed until the final award is given.</p>
[5] Consultant Rate Disclaimer	<p>The Commission takes this opportunity to remind all intervenors that they bear the burden of providing accurate, complete, and honest information in all compensation requests. The Commission relies on intervenors' good faith representations, particularly regarding consultant agreements and payments, as it does not have the resources to review every contract or non-standard arrangement in detail.</p> <p>Intervenor compensation is funded by ratepayers, and the Commission takes seriously any effort to mislead or obscure the financial basis for a claim. Although no violation of Rule 1.1 has been found in this instance, we remind intervenors that under Rule 1.1, intent to deceive is not required for a violation, misstatements may still be actionable. Dishonest or misleading claims not only risk denial of compensation but may also subject the intervenor to penalties.</p> <p>The Commission has clear authority to audit intervenors' books and records to verify the basis for any award. Intervenors must therefore ensure full transparency regarding actual time spent on issues, consultant fees, payment arrangements, and the actual disbursement of funds. Failure to meet this</p>

Item	Reason
	obligation undermines the integrity of the compensation process and may lead to denial of claims or further enforcement action.

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

A. Opposition: Did any party oppose the Claim?	No
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B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?	Yes
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FINDINGS OF FACT

1. Small Business Utility Advocates has made a substantial contribution to D.25-10-034.
2. SBUA's claimed hours are reduced for purposes of compensation to reasonably reflect the value of the substantive contribution provided.
3. The requested hourly rates for Small Business Utility Advocates' 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.
4. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
5. The total of reasonable compensation is \$19,435.60.

CONCLUSION OF LAW

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

ORDER

1. Small Business Utility Advocates is awarded \$19,435.60.
2. Within 30 days of the effective date of this decision, San Diego Gas & Electric Company shall pay Small Business Utility Advocates 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

March 22, 2026, the 75th day after the filing of Small Business Utility Advocates' request, and continuing until full payment is made.

3. The comment period for today's decision is waived.

This decision is effective today.

Dated _____, at Fort Bragg, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D2510034		
Proceeding(s):	A2504015		
Author:	ALJ Andrew Dugowson		
Payer(s):	San Diego Gas & Electric Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Small Business Utility Advocates	Jan. 6, 2026	\$25,413.50	\$19,435.60	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
Matt	Sheriff	Expert ⁶	\$365	2025	\$365.00
Ariel	Strauss	Attorney ⁷	\$520	2025	\$520.00
James	Birkelund	General Counsel ⁸	\$830	2025	\$830.00

(END OF APPENDIX)

⁶ Matt Sheriff serves as a consultant to SBUA.

⁷ Ariel Strauss serves as a consultant to SBUA.

⁸ James Birkelund serves as a consultant to SBUA.