

Decision 26-07-020 July 2, 2026

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Application of San Diego Gas & Electric Company (U902E) for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design.

Application 23-01-008  
(Filed January 17, 2023)

**DECISION GRANTING COMPENSATION TO THE UTILITY REFORM NETWORK FOR SUBSTANTIAL CONTRIBUTION TO DECISION (D.) 25-09-006**

<b>Intervenor:</b> The Utility Reform Network (TURN)	<b>For contribution to</b> D.25-09-006
<b>Claimed:</b> \$188,148.44	<b>Awarded:</b> \$188,148.44
<b>Assigned Commissioner:</b> John Reynolds <sup>1</sup>	<b>Assigned ALJ:</b> Marcelo Poirier <sup>2</sup>

**PART I: PROCEDURAL ISSUES**

<b>A. Brief description of Decision:</b>	In D.25-09-006, the Commission adopted three settlement agreements in San Diego Gas & Electric Company’s 2024 General Rate Case Phase 2, resolving cost allocation, marginal costs, time-of-use rate design, and medical baseline issues. The decision also adopted the system percentage of change methodology, addressed Power Charge Indifference Adjustment rate design and bill presentment issues, and approved SDG&E’s uncontested proposals.
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<sup>1</sup> Application 23-01-008 was reassigned to President John Reynolds on May 27, 2026.

<sup>2</sup> Application 23-01-008 was reassigned from Administrative Law Judge (ALJ) Rajan Mutialu to Administrative Law Judge (ALJ) Marcelo Poirier on April 9, 2026.

**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812<sup>3</sup>:**

	<b>Intervenor</b>	<b>CPUC Verification</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	5/10/2023	Verified
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	6/9/2023	Verified
4. Was the NOI timely filed?		Yes
<b>Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):</b>		
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
<b>Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):</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
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.25-09-006	Verified
14. Date of issuance of Final Order or Decision:	9/22/2025	Verified
15. File date of compensation request:	11/20/2025	Verified
16. Was the request for compensation timely?		Yes

<sup>3</sup> 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><b><u>1. Marginal Distribution Customer Costs (MDCC)</u></b></p> <p>SDG&amp;E proposed using the Real Economic Carrying Charge (RECC) method to calculate marginal distribution customer costs.</p> <p>TURN proposed using the New Customer Only (NCO) method instead, arguing that marginal customer costs are driven by new customer additions rather than existing customers. TURN stated that using the NCO method more accurately reflected cost causation by linking transformer, service drop, and meter costs to incremental customer growth.</p> <p>The Marginal Cost Settlement Agreement did not adopt the RECC or NCO method and instead struck a balance by adopting a compromise position that for SDG&amp;E to set MDCCs based on results from its 2024 marginal cost study for all customer classes, which D.25-09-006 determined was reasonable.</p>	<ul style="list-style-type: none"> <li>• D.25-09-006, p.10.</li>   <li>• Ex. TURN-1E (TURN Opening Testimony), p.11 &amp; D.25-09-006, pp.11-12.</li>   <li>• D.25-09-006, p.13.</li> </ul>	<p>Verified</p>
<p><b><u>2. Marginal Distribution Demand Costs (MDDC)</u></b></p> <p>SDG&amp;E calculated MDDCs using the NERA regression model and proposed values based on its 2024 marginal cost study, asserting that only capacity-related distribution investments should be reflected in MDDCs. SDG&amp;E maintained that its forecast model appropriately accounted for actual maximum</p>	<ul style="list-style-type: none"> <li>• D.25-09-006, p.13.</li> </ul>	<p>Verified</p>

<p>peak loads and that forecasted peak loads are more appropriate for determining needed distribution infrastructure.</p> <p>TURN recommended including an adder in the MDDC calculation to recover costs associated with maintaining the distribution system. TURN argued that without a maintenance component, SDG&amp;E’s MDDCs would omit necessary distribution investments required to sustain system operations. SEIA also proposed expanding marginal distribution demand costs to include non capacity investments and stated that reliability and wildfire hardening costs should be reflected.</p> <p>TURN was active in settlement negotiations and signed onto to the Marginal Cost Settlement Agreement which the Commission adopted. The Settlement Agreement adopted a compromise position to use marginal distribution demand cost values from its 2024 marginal cost study for rate design purposes in this proceeding. The Commission also stated that interveners may propose updated marginal distribution demand cost values in future proceedings based on more recent data.</p>	<ul style="list-style-type: none"> <li>• Ex. TURN-1E at 16-17.</li> <li>• D.25-09-006, pp. 14-15.</li> </ul>	
<p><b><u>3. Marginal Commodity Costs</u></b>          Another aspect of the marginal cost settlement was adopting values for marginal commodity costs, which include marginal energy cost (MECs), that is the cost to provide an incremental unit of electricity consumption, and marginal generation capacity cost (MGCC), or the cost to provide an incremental unit of generation capacity or power. Regarding MECs, TURN proposed using an updated RPS adder, and also that the MEC should include an ancillary services adder.</p> <p>Regarding MGCCs, TURN’s proposed a higher Peak MGCC than SDG&amp;E on the basis</p>	<ul style="list-style-type: none"> <li>• Ex. TURN-1E, p. 31.</li> </ul>	<p>Verified</p>

<p>of the average of six years of new-battery-cost forecasts using the most current IRP RESOLVE model, which was moderated by TURN’s proposed modification of SDG&amp;E’s estimate of the Effective Load Carrying Capability (ELCC), which resulted in higher battery-related capital costs.</p> <p>The settlement agreement adopted a compromise position, whereby SDG&amp;E will update marginal distribution demand costs and marginal distribution customer costs based on the 2024 marginal cost study, and maintain marginal commodity costs (marginal energy costs and marginal generation capacity costs), based on the 2019 marginal cost study, for all customer classes, for purposes of electric rate design. It also included a provision based on TURN and Cal Advocates’ proposals requiring SDG&amp;E to update marginal commodity costs for purposes of future dynamic rate proposals, which will help ensure that dynamic rates are cost-based and rely on updated marginal costs.</p> <p>Decision 25-09-006 adopted the Marginal Cost Settlement Agreement terms that resolve issues concerning MECs and MGCCs “because it is reasonable in light of the whole record, consistent with the law, and in the public interest.” It noted that the settlement’s MGCC value “strikes a fair balance between MGCC proposals put forward by SDG&amp;E, Cal Advocates, TURN, and SEIA.” It also reiterated the importance of updating MEC and MGCC for the purpose of future dynamic rate proposals.</p>	<ul style="list-style-type: none"> <li>• Ex. TURN-1E, pp. 13-19 &amp; 21-27.</li>   <li>• Marginal Cost Settlement Agreement, pp. 14-15.</li>   <li>• D.25-09-006, p. 24.</li> <li>• D.25-09-006, pp. 25-26.</li> </ul>	
<p><b><u>4. Medical Baseline Cost Recovery Through the Public Purpose Program (PPP)</u></b></p> <p>SDG&amp;E noted that Medical Baseline Program costs were currently recovered through the distribution rate component and did not</p>		<p>Verified</p>

<p>propose to recover these costs through the Public Purpose Program (PPP) surcharge.</p> <p>TURN proposed recovering Medical Baseline Program costs through the PPP surcharge using an equal-cents-per-kWh allocator, explaining that PPP-based recovery would more fairly distribute the costs of a state-mandated program designed to serve the public interest. In rebuttal testimony, SDG&amp;E supported TURN’s proposal, recommending two modifications: using the Energy Savings Assistance Program allocator because the Medical Baseline Program is not a low-income program, and establishing a balancing account to track Medical Baseline Program costs.</p> <p>The Commission adopted the Partial Settlement Agreement provisions incorporating TURN’s PPP cost-recovery proposal. The Commission found it reasonable to establish a Medical Baseline Program Balancing Account and to recover Medical Baseline Program discount costs through the PPP rate component using an equal-cents-per-kWh allocator, with the exception of the Street Lighting class. The Commission concluded that PPP-based recovery aligned with the purpose of the Medical Baseline Program and the intent of the Public Purpose Program, adopting the cost-tracking and cost-recovery structure developed from TURN’s proposal.</p>	<ul style="list-style-type: none"> <li>• Ex. TURN-1E, p. 36.</li>   <li>• D.25-09-006, pp. 43-44.</li> </ul>	
<p><b><u>5. Wildfire-Related Costs Cost Allocation</u></b>          Wildfire-related costs are currently recovered through distribution revenues based on the EPMC methodology. In opening testimony, SDG&amp;E proposes to continue using this methodology to collect wildfire-related costs. TURN proposed that an equal cents per kilowatt-hour methodology should be used to collect wildfire-related costs because it</p>	<ul style="list-style-type: none"> <li>• Ex. TURN-2 (TURN Rebuttal</li> </ul>	<p>Verified</p>

<p>assigns these costs to all customer classes more fairly instead of disproportionately burdening the residential customer class. In response to TURN and Cal Advocates' concerns, SDG&amp;E proposed the use of the equal percentage of total revenues (EPTR) methodology for non-securitized wildfire-related costs as it spread the costs more evenly to all customer classes than the EPMC method. The Partial Settlement Agreement provides for an EPTR Methodology which will allocate non-securitized wildfire-related revenue requirements annually to all SDG&amp;E customer classes with distribution rate design and allocations based on the present total revenue. TURN also investigated which memorandum and balancing accounts this treatment should apply to and primarily due to TURN's participation in settlement negotiations, all non-securitized wildfire-related accounts are subject to this treatment. SDG&amp;E also agreed to apply the EPTR methodology to any future non-securitized wildfire-related and vegetation management-related accounts. Decision 25-09-006 found this to be reasonable and approved this aspect of the settlement. This will benefit residential ratepayers by reducing the allocation to the residential class' of wildfire and vegetation related costs.</p>	<p>Testimony), pp. 35-36.</p> <ul style="list-style-type: none"> <li>• Partial Settlement Agreement, p. 17.</li> <li>• D.25-09-006, p. 51.</li> <li>• D.25-09-006, p. 51 &amp; 88, COL 24 &amp; 25.</li> </ul>	
<p><b><u>6. Revenue Allocation</u></b>  SDG&amp;E proposed to maintain System Average Percent Change (SAPC) for revenue allocations for the Distribution, Demand Response, Commodity, Competition Transition Charges (CTC), and Local Generation Charge (LGC) rate components with updates made to accommodate the proposed Medium Commercial customer class.</p>		<p>Verified</p>

<p>TURN did not oppose SDG&amp;E’s proposal to continue adjusting revenue allocations on an annual basis using the SAPC method in furtherance of the goal of rate stability. In the event the Commission declined to adopt the SAPC method, TURN made an alternative recommendation to adopt the Commission’s traditional revenue allocation method, the Equal Percentage of Marginal Cost (EPMC) method with revenue allocation based on TURN’s proposed marginal cost studies.</p> <p>The Partial Settlement Agreement adjusts the commodity allocations according to the Commission-approved SAPC methodology. The Commission adopted this provision and determined it was reasonable to levelize rate changes.</p> <p>Settling parties declined to incorporate SDG&amp;E’s proposal to use SAPC to allocate distribution revenue and instead relied on capped marginal costs to move distribution costs partially toward cost basis. While several parties recommended distribution marginal costs as alternatives, the Partial Settlement Agreement ultimately adjusted the distribution revenue allocations on the basis of the capped average of TURN- and SDG&amp;E-generated, distribution marginal-cost values.</p>	<ul style="list-style-type: none"> <li>• Ex. TURN-1E, p. 35.</li>   <li>• Partial Settlement Agreement, p. B-11.</li> <li>• D.25-09-006, p. 49.</li>   <li>• Partial Settlement Agreement, p. 26.</li> </ul>	
<p><b><u>7. Medical Baseline Discount Reform</u></b></p> <p>SDG&amp;E’s medical baseline program was structured differently than the other investor owned electric utilities in that it provided both a rate discount and a higher baseline allowance, which resulted in different discount levels based on which rate the customer is on and a significantly higher total subsidy than the other utilities. TURN recommended modifying the discount so the discounts provided would be harmonized for customers on tiered and non-tiered rates and</p>	<ul style="list-style-type: none"> <li>• Exhibit TURN-1E. p. 41.</li> </ul>	<p>Verified</p>

<p>to reduce impacts on other residential customers.</p> <p>The Medical Baseline (MB) Settlement adopted Cal Advocates proposal which TURN supported. In settlement negotiations, TURN advocated for enhanced data tracking and reporting measures which were ultimately adopted and will help the Commission evaluate the impact of the MB discount change on CARE and non-CARE MB customers.</p> <p>The Commission adopted the MB Settlement because it enables all SDG&amp;E Medical Baseline customers enrolled on untiered rates to receive a Medical Baseline Discount, aligns SDG&amp;E’s Medical Baseline Discount in the range of effective Medical Baseline Discounts offered by PG&amp;E and SCE, reduces the cost shift to SDG&amp;E’s non-Medical Baseline customers, and will be implemented during four-year glidepath to minimize rate impacts.</p>	<ul style="list-style-type: none"> <li>• Medical Baseline Settlement Agreement, pp. 7-9 &amp; D.25-09-006, p. 60.</li> <li>• D.25-09-006, p. 60 &amp; p.89 COL 27.</li> </ul>	
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**B. Duplication of Effort (§ 1801.3(f) and § 1802.5):**

	Intervenor’s Assertion	CPUC Discussion
<b>a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?</b>	Yes.	Verified
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	Yes.	Verified
<b>c. If so, provide name of other parties:</b> SBUA & UCAN (for some issues)		Noted
<b>d. Intervenor’s claim of non-duplication:</b> TURN coordinated with Cal Advocates, SBUA and UCAN throughout the proceeding to avoid duplicative efforts. While each party opposed various aspects of SDG&E’s proposals, TURN presented unique analysis and many unique positions.		Noted

<p>For example, TURN &amp; Cal Advocates proposed that an equal cents per kilowatt-hour methodology should be used to collect wildfire-related costs because it assigns these costs to all customer classes that benefit from reduced life and property risks and reduced greenhouse gas emissions. TURN advocated strongly for this proposal in settlement negotiations and for the inclusion all non-securitized wildfire-related costs.</p> <p>For the partial settlement, the Settling parties declined to adopt SDG&amp;E’s litigation position that the Commission adopt SAPC methodology for cost allocation and instead elected to include TURN’s marginal-cost values, to the exclusion of several other intervenor values, for the purposes of moving the distribution allocation toward cost basis.</p> <p>TURN and Cal Advocates were the only intervenors to join the medical baseline settlement and the Commission relied on TURN’s analysis in finding that the settlement was reasonable in order to reduce impacts to other residential customers and to harmonize the discounts regardless of the rate schedule the MB customer chooses.</p> <p>The Commission should find that TURN’s participation was efficiently coordinated with the participation of Cal Advocates and other intervenors so as to avoid undue duplication and to ensure that to the extent duplication occurred, it served to supplement, complement, or contribute to the showing of the other intervenor. And consistent with such a finding, the Commission should determine that all of TURN’s work is compensable consistent with the conditions set forth in Section 1802.5.</p>	
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**PART III: REASONABLENESS OF REQUESTED COMPENSATION**

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

	<b>CPUC Discussion</b>
<p><b>a. Intervenor’s claim of cost reasonableness:</b></p> <p>TURN’s request for intervenor compensation seeks an award of approximately \$188,000 as the reasonable cost of our participation in this proceeding. TURN submits that these costs are reasonable in light of the importance of the issues TURN addressed.</p> <p>D.25-09-006 addressed three different settlements that collectively resolved all rate design, revenue allocation and marginal cost issues for SDG&amp;E’s 2024 GRC. TURN actively participated in multiple settlement</p>	<p>Noted</p>

<p>negotiations that resulted in more equitable rate design and cost allocation terms. TURN's participation led to meaningful benefits for residential ratepayers. TURN played a crucial role in helping to achieve a marginal cost/revenue allocation settlement that confers substantial economic benefits upon residential customers. For example, the adoption of TURN's distribution marginal costs for revenue allocation and proposal to allocate all wildfire related costs more equally across all customer classes will significantly reduce the burden of those costs on residential ratepayers as compared to the previous allocation using the distribution rate allocator. TURN's proposal to have the medical baseline program costs recovered through the public purpose program (PPP) charge that was adopted in the partial settlement will also reduces the amount of costs allocated to residential customers.</p> <p>TURN also played a key role in negotiating the medical baseline (MB) settlement, which resulted in rate and discount stability for MB customers and reduction of the overall subsidy for the MB Discount, which is significantly higher than the subsidies paid by either PG&amp;E or SCE's ratepayers. The enhanced data tracking and reporting measures TURN advocated for, and which were included in the settlement, will help the Commission evaluate the impact of the MB discount change on CARE and non-CARE MB customers.</p> <p>For these reasons, the Commission should find that TURN's efforts have been productive and the requested amount of compensation is reasonable in light of the benefits achieved through those efforts.</p>	
<p><b>b. Reasonableness of hours claimed:</b></p> <p>This Request for Compensation includes around 437 hours of TURN's attorney and expert time, the equivalent of about 11 weeks of full-time work for an individual attorney. TURN notes that this proceeding took over 2.5 years to resolve. TURN's efforts reflected herein resulted in significant contributions to D.25-09-006, detailed above, and encompass the preparation of testimony, rebuttal testimony, comments and other filings by TURN.</p> <p>TURN assigned this proceeding to Assistant Managing Attorney Elise Torres. This request for compensation includes approximately 217 hours of Ms. Torres' time. Consistent with her primary role as TURN's attorney, Ms. Torres represented TURN in interactions with the Commission and other parties, including at status conferences and various meet and confers required by the ALJs. Ms. Torres took primary responsibility for drafting TURN's protest to SDG&amp;E's application and portions of all three</p>	<p>Noted</p>

settlement agreements. Ms. Torres also oversaw Mr. Jones' work on discovery and the development of his testimonies.

Given the complexity of the issues presented in Phase 2 of a GRC, TURN retained the services of Garrick Jones to prepare testimony on a wide range of issues. Mr. Jones has extensive experience in related utility proceedings and was able to effectively analyze very challenging data and a plethora of issues. TURN relied heavily on Mr. Jones in this proceeding. He assisted TURN with reviewing SDG&E's application, and prepared testimony on Marginal Costs, Revenue Allocation, SDG&E's rate design proposals and other issues and rebuttal testimony responding to a number of issues raised by other parties.

TURN devoted substantial time to settlement negotiations on marginal costs and revenue allocation, sales forecast, rate design proposals and the medical baseline discount. Generally Ms. Torres represented TURN in settlement negotiations, but Mr. Jones also participated actively in the marginal cost settlement and revenue allocation settlement negotiations given the technical nature of the discussions. Given TURN's substantial contributions in this proceeding, as well as the role played by TURN's staff and expert consultant during settlement negotiations, the Commission should find that the number of hours claimed by TURN is reasonable.

This request also includes limited time (5.25 hours) for TURN General Counsel Robert Finklestein who represented TURN at the PHC because Ms. Torres was unavailable, and advised Ms. Torres on the specifics of TURN's wildfire related costs cost recovery proposal terms in the settlement as he has represented TURN in many wildfire cost recovery proceedings.

This request also includes limited time (3 hours) for TURN paralegal, Reina Yanagiba who assisted TURN's attorney and expert with discovery.

TURN is also requesting compensation for 17 hours of intervenor compensation-related efforts associated with preparation of this request for compensation, primarily by Ms. Torres. 3 of the total hours are for Ms. Yanagiba's drafting of Parts I and IV of the request for compensation. Ms. Torres also drafted TURN's notice of intent to claim compensation (NOI).

TURN suggests that the Commission should find that the number of issues addressed by TURN in this proceeding, the time necessary for preparing various pleadings and testimonies, and the time required by evidentiary hearings warrant finding that the hours spent were reasonable. However, should the Commission believe that more information is needed or that a different approach to discussing the reasonableness of the requested hours

is warranted here, TURN requests the opportunity to supplement this section of the request.			
<p><b>c. Allocation of hours by issue:</b></p> <p>TURN has allocated all of our attorney and expert time by issue area or activity, as is evident on our attached timesheets (Attachment 2) and in Attachment 3, which shows the allocation of TURN's time included in this request by attorney or expert and issue / activity area. The following codes relate to specific substantive issue and activity areas addressed by TURN.</p>			Noted, totals 100%
Code	Description	Allocation of Time	
Comm. MC	Work related to evaluating SDG&E's testimony regarding marginal commodity costs: marginal energy costs (MEC) & marginal gen capacity costs (MGCC), reviewing other parties' testimonies on these issues and researching and drafting TURN's testimony and rebuttal testimony addressing these issues	23.14%	
Proc	Procedural work required by ALJs, including meet and confers, status conferences, PHCs, reviewing & analyzing ALJ Rulings	3.14%	
Coord	Work related to external coordination with other parties to inform TURN's efficient and effective participation that was not specific to one of the major issue areas addressed by TURN	2.69%	
Disc	Work related to discovery, including researching and drafting data requests regarding SDG&E's & other parties' testimonies & SDG&E's supplemental testimony and researching and drafting responses to SDG&E's data requests regarding TURN's testimony	6.63%	
GP	General participation related to the proceeding, such as reviewing SDG&E's application, party testimonies, researching and	5.59%	

	drafting the protest, reviewing & analyzing other parties' protests & reviewing and analyzing PD		
MB	Work related to reviewing SDG&E's Medical Baseline program change proposal, other parties' testimonies on the issue and researching and drafting TURN's testimony on the issue	3.63%	
MDCC	Work related to evaluating SDG&E's testimony regarding Marginal Distribution Customer Costs, reviewing other parties' testimonies on these issues and researching and drafting TURN's testimony and rebuttal testimony addressing this issue	12.52%	
MDDC	Work related to evaluating SDG&E's testimony regarding Marginal Distribution Demand Costs, reviewing other parties' testimonies on these issues and researching and drafting TURN's testimony and rebuttal testimony addressing this issue	6.84%	
RA	Work related to evaluating SDG&E's Revenue Allocation proposals and other party testimonies and researching and drafting TURN's testimony and rebuttal testimony addressing this issue	6.25%	
RD	Work related to evaluating SDG&E's testimony regarding rate design, including TOU differential changes and its schedule VGI and public GIR rate design change proposal, reviewing other parties' testimonies on these issues and researching and drafting TURN's testimony and rebuttal testimony addressing these issues	1.99%	
Sett	General work on the settlement including participating in initial settlement meetings before the need for separate issue specific	8.08%	

	settlements became evident, settlement meetings addressing multiple issues, participation in the settlement conference and reviewing & revising joint settlement filings, not specifically related to certain issues	
Sett (RD)	Work on the partial settlement regarding rate design issues and drafting reply comments on the settlement	1.39%
Sett (MB)	Work on the medical baseline partial settlement and drafting joint reply comments on the settlement	6.14%
Sett (MC)	General work on all Marg. Cost settlement issues, including Marginal Dist. Demand Costs, Marginal commodity costs & Marginal Dist. Customer Costs and drafting joint reply comments on the settlement	3.58%
Sett (RA)	Work on the partial settlement regarding rev. allocation, including the allocation of wildfire mitigation costs, and drafting reply comments on the settlement	8.40%

**B. Specific Claim:\***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Elise Torres, TURN Attorney	2023	68.75	\$510.00	D.24-01-045	\$35,062.50	68.75	\$510.00 [1]	\$35,062.50
Elise Torres, TURN Attorney	2024	146.25	\$555.00	D.25-03-022	\$ 81,168.75	146.25	\$555.00 [1]	\$81,168.75

CLAIMED						CPUC AWARD		
Elise Torres, TURN Attorney	2025	2.25	\$600.00	Res. ALJ-393, 2024 rate plus 3.46% COLA and additional increase for move to Attorney - Level IV experience tier. See Comment 1	\$1,350.00	2.25	\$600.00 [1]	\$1,350.00
Garrick Jones, InfraSMA RT Energy, LLC	2023	110.81	\$285.00	D.24-10-025, See Comment 2.	\$31,580.57	110.81	\$285.00 [2]	\$31,580.85
Garrick Jones, InfraSMA RT Energy, LLC	2024	101.30	\$295.00	Res. ALJ-393, 2023 Rate plus 4.07% COLA. See Comment 3.	\$29,883.50	101.30	\$295.00 [2]	\$29,883.50
Reina Yanagiba, TURN Legal Assistant	2023	2.75	\$95.00	D.24-04-030	\$261.25	2.75	\$95.00 [3]	\$261.25
Reina Yanagiba, TURN Legal Assistant	2024	0.25	\$100.00	D.24-06-021	\$25.00	0.25	\$100.00 [3]	\$25.00
Robert Finkelstein, TURN General Counsel	2023	3.25	\$840.00	D.24-02-040	\$2,730.00	3.25	\$840.00 [4]	\$2,730.00

CLAIMED						CPUC AWARD		
Robert Finkelstein, TURN General Counsel	2024	2.00	\$875.00	D.24-07-033	\$1,750.00	2.00	\$875.00 [3]	\$1,750.00
<b>Subtotal: \$183,811.57</b>						<b>Subtotal: \$183,811.57</b>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Elise Torres, TURN Attorney	2023	1.00	\$255.00	50% of 2023 Hourly Rate	\$255.00	1.00	\$255.00 [1]	\$255.00
Elise Torres, TURN Attorney	2024	0.25	\$277.50	50% of 2024 Hourly Rate	\$69.38	0.25	\$277.50 [1]	\$69.38
Elise Torres, TURN Attorney	2025	12.75	\$300.00	50% of 2025 Hourly Rate	\$3,825.00	12.75	\$300.00 [1]	\$3,825.00
Reina Yanagiba, TURN Legal Assistant	2025	3.00	\$62.50	50% of 2025 Hourly Rate	\$187.50	3.00	\$62.50 [3]	\$187.50
						<b>Subtotal: \$4,336.88</b>		
<b>TOTAL REQUEST: \$188,148.44</b>						<b>TOTAL AWARD: \$188,148.44</b>		

\*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

CLAIMED		CPUC AWARD	
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR <sup>4</sup>	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Elise Torres	December 2011	280443	No
Robert Finkelstein	June 1990	146391	No

**C. Attachments Documenting Specific Claim and Comments on Part III<sup>5</sup>:**

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	Documentation of Consultant Garrick Jones' 2023 and 2024 Hourly Rate
Comment #1	<p><b>2025 Rate for Elise Torres</b></p> <p>For Ms. Torres's work in 2025, TURN requests that the Commission adjust her 2024 rate of \$555, authorized in D.25-03-022, in two regards: (1) by applying the annual escalation adjustment authorized by Resolution ALJ-393, 3.46%; and (2) further adjusting Ms. Torres's hourly rate by 5% to recognize her move from Attorney - Level III (5-10 years) to Attorney - Level IV (10-15 years). In D.08-04-010, the Commission recognized moving to a higher experience tier as one of the circumstances that qualifies an intervenor representative for a rate increase, apart from annual COLA adjustments and "step" increases. (D.08-04-010, p. 8). The requested rate adjustment for Ms. Torres’s change in experience tier is consistent with the Commission’s adoption of a similar adjustment in setting TURN Attorney David Cheng’s 2024 hourly rate in D.24-07-030. (D.24-07-030, p. 11).</p> <p>Ms. Torres was admitted to the CA bar in December 2011. In D.21-12-049, which authorized the first rate for Ms. Torres pursuant to Resolution ALJ-393, the Commission recognized that Ms. Torres had worked in utility regulation for 9 years and practiced as an attorney for 7 ½ years in setting her 2021 rate in the Attorney – Level III labor role. (D.21-12-049, p. 25). By 2025, Ms. Torres has four more years of experience, putting her squarely in the Attorney – Level IV labor role, with 11 ½ years practicing law and 13 ½</p>

<sup>4</sup> This information may be obtained through the State Bar of California’s website at <https://apps.calbar.ca.gov/attorney/LicenseeSearch/QuickSearch>.

<sup>5</sup> Attachments not included in the final Decision.

Attachment or Comment #	Description/Comment
	<p>years of directly relevant experience working in utility regulation. TURN has not previously requested a rate that recognizes this change in Ms. Torres’ experience. Consistent with prior decisions, the Commission should continue to recognize that “professional experience gained by a practitioner ... while employed in a role other than an attorney can nonetheless confer directly relevant skills and expertise which warrant consideration in determining hourly rates for purposes of the Intervenor Compensation Program.” (D.24-07-030, p. 11, citing D.19-04-035, p. 13).</p> <p>TURN accordingly requests a 2025 rate for Ms. Torres of \$600. Calculation: \$555 x [1.0346 (COLA) + 0.05 (move to higher tier)] = \$601.95, rounded to \$600.</p>
Comment #2	<p><b>2023 Hourly Rate for Garrick Jones, InfraSMART Energy, Inc.</b></p> <p>TURN requests an hourly rate of \$285 for consultant Garrick Jones’s 2023 work in this proceeding. This is the rate charged by Mr. Jones to TURN in 2023. This rate is also consistent with the rate previously approved by the Commission in D.24-10-026 for Mr. Jones’s work in 2023 in the PG&amp;E TY 2023 GRC.</p>
Comment #3	<p><b>2024 Hourly Rate for Garrick Jones, InfraSMART Energy, Inc.</b></p> <p>TURN requests an hourly rate of \$295 for consultant Garrick Jones’s 2024 work in this proceeding. This is the rate charged by Mr. Jones to TURN in 2024. This rate is also consistent with the rate previously approved by the Commission in D.24-10-026 for Mr. Jones’s work in 2023, \$285, adjusted by the Commission’s 2024 escalation rate of 4.07% (Res. ALJ-393) and rounded to the nearest \$5 increment [<math>\\$285 * 1.0407 = \\$296.60</math>, rounds down to \$295].</p>

**D. CPUC Comments, Disallowances, and Adjustments**

Item	Reason
<p>[1] Elise Torres’ (Torres) 2023, 2024, and 2025 Hourly Rates &amp; Intervenor Compensation Rates</p>	<p>D.24-01-045 approved a 2023 rate of \$510.00 for Torres. As Intervenor Compensation Claim Preparation hours are compensated at ½ preparer’s normal hourly rate, we apply the rate of \$255 for Torres.</p> <p>D.25-03-022 approved a 2024 rate of \$555.00 for Torres. As Intervenor Compensation Claim Preparation hours are compensated at ½ preparer’s normal hourly rate, we apply the rate of \$277.50 for Torres.</p>

Item	Reason
	<p>D.26-04-043 approved a 2025 rate of \$600.00 for Torres. As Intervenor Compensation Claim Preparation hours are compensated at ½ preparer’s normal hourly rate, we apply the rate of \$300.00 for Torres.</p>
<p>[2] Garrick Jones’ (Jones) 2023 and 2024 Hourly Rates</p>	<p>TURN requests a rate of \$285.00 in 2023 and a rate of \$295.00 in 2024 for Jones. Jones’ resume and information provided by TURN in this claim confirms that he is a consultant. Hourly rates claimed for consultants must be the same rates paid to consultants for work performed in the proceeding pursuant to Resolution ALJ-235 at 4. 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 provided invoices for Jones’ consulting services for this proceeding and has confirmed that Jones was paid \$285.00 per hour in 2023, and \$295.00 per hour in 2024. We therefore approve the 2023 rate of \$285.00 and the 2024 rate of \$295.00 for Jones here.</p> <p>The award determined herein for the consultant’s contribution in this proceeding shall be paid in full to the consultant, and no portion of this part of the award shall be kept by the intervenor. 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>
<p>[3] Reina Yanagiba’s (Yanagiba) 2023 and 2024 Hourly Rates and 2025 Intervenor Compensation Rate</p>	<p>D.24-04-030 approved a 2023 hourly rate of \$95.00 for Yanagiba.</p> <p>D.24-06-021 approved a 2024 hourly rate of \$100.00 for Yanagiba.</p> <p>D.26-03-040 approved a 2025 hourly rate of \$125.00 for Yanagiba, As Intervenor Compensation Claim Preparation hours are compensated at ½ preparer’s normal hourly rate, we apply the rate of \$62.50 for Yanagiba.</p>
<p>[4] Robert Finkelstein’s (Finkelstein) 2023 and 2024 Hourly Rates</p>	<p>D.24-03-036 approved a 2023 hourly rate of \$840.00 for Finkelstein.</p> <p>D.26-02-022 approved a 2024 hourly rate of \$875.00 for Finkelstein.</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))**

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

1. The Utility Reform Network has made a substantial contribution to D.25-09-006.
2. The requested hourly rates for The Utility Reform Network’s representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$188,148.44.

**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 \$188,148.44.
2. Within 30 days of the effective date of this decision, San Diego Gas & 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 February 3, 2026, the 75<sup>th</sup> 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 July 2, 2026, at Fort Bragg, California.

JOHN REYNOLDS

President

DARCIE L. HOUCK

KAREN DOUGLAS

Commissioners

Commissioner Matthew Baker recused himself from this agenda item and was not part of the quorum in its consideration.

Commissioner Christine Harada being absent did not participate in the vote of this item.

## APPENDIX

## Compensation Decision Summary Information

<b>Compensation Decision:</b>		<b>Modifies Decision?</b>	No
<b>Contribution Decision(s):</b>	D2509006		
<b>Proceeding(s):</b>	A2301008		
<b>Author:</b>	ALJ Marcelo Poirier <sup>2</sup>		
<b>Payer(s):</b>	San Diego Gas & Electric Company		

## Intervenor Information

<b>Intervenor</b>	<b>Date Claim Filed</b>	<b>Amount Requested</b>	<b>Amount Awarded</b>	<b>Multiplier?</b>	<b>Reason Change/Disallowance</b>
The Utility Reform Network	November 20, 2025	\$188,148.44	\$188,148.44	N/A	See Part III.D CPUC Comments, Disallowances and Adjustments

## Hourly Fee Information

<b>First Name</b>	<b>Last Name</b>	<b>Attorney, Expert, or Advocate</b>	<b>Hourly Fee Requested</b>	<b>Year Hourly Fee Requested</b>	<b>Hourly Fee Adopted</b>
Elise	Torres	Attorney	\$510	2023	\$510
Elise	Torres	Attorney	\$555	2024	\$555
Elise	Torres	Attorney	\$600	2025	\$600
Robert	Finkelstein	Attorney	\$840	2023	\$840
Robert	Finkelstein	Attorney	\$875	2024	\$875
Garrick	Jones	Consultant	\$285	2023	\$285
Garrick	Jones	Consultant	\$295	2024	\$295
Reina	Yanagiba	Legal Assistant <sup>6</sup>	\$95	2023	\$95
Reina	Yanagiba	Legal Assistant <sup>6</sup>	\$100	2024	\$100
Reina	Yanagiba	Legal Assistant <sup>7</sup>	\$125	2025	\$125

(END OF APPENDIX)

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<sup>6</sup> Yanagiba is classified as a Paralegal I.

<sup>7</sup> Yanagiba is classified as a Paralegal II.