

Decision 26-07-021 July 2, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Advance Demand Flexibility Through Electric Rates

Rulemaking 22-07-005
(Filed July 14, 2022)

DECISION GRANTING COMPENSATION TO CENTER FOR ACCESSIBLE TECHNOLOGY FOR SUBSTANTIAL CONTRIBUTION TO DECISION (D.) 25-08-049 AND IGFC IMPLEMENTATION PROCESS, INCLUDING ADVICE LETTERS AND RESOLUTION E-5354, RESOLUTION E-5355 AND RESOLUTION E-5356

Intervenor: Center for Accessible Technology (CforAT)	For contribution to Decision D.25-08-049 and IGFC Implementation Process, including Advice Letters and Resolution E-5354, Resolution E-5355 and Resolution E-5356
Claimed: \$79,543	Awarded: \$70,072.35
Assigned Commissioner: John Reynolds ¹	Assigned ALJ: Carolyn Sisto

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	<p>Decision 25-08-049 (the Track B Decision) addresses Track B of the proceeding and adopts guidelines for Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company to design demand flexibility rates and comply with the California Energy Commission’s Load Management Standards. The Track B Decision addresses the input from Working Group 1 authorized in the Scoping Memo issued in this proceeding and closes the proceeding.</p> <p>The IGFC Implementation Process resulted in the issuance of various Advice Letters (SDG&E AL 4572-E and SDG&E AL 4582-E) and Resolutions (Res. E-5354,</p>
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¹ R.22-07-005 was reassigned from Commissioner Alice Reynolds to Commissioner John Reynolds on March 3, 2026.

	Res. E-5355, Res. E-5356) which reflected work by stakeholders to support the introduction of the Base Services Charge for the IOUs, beginning with SDG&E in October of 2025 and proceeding with SCE and PG&E. The ongoing rollout of the charge also relied on the work of the BSC Implementation Working Group, created in D.24-05-028, in which CforAT served as an active member.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812²:

	INTERVENOR	CPUC VERIFICATION
Timely filing of notice of intent to claim compensation (NOI) (§1804(a)):		
1. Date of Prehearing Conference:	9/16/2022	Verified
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	10/11/2022	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:	See below	R.21-06-017
6. Date of ALJ ruling:	See below	11/8/2021
7. Based on another CPUC determination (specify):	See below	Noted
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:	See below	R.21-06-017
10. Date of ALJ ruling:	See below	11/8/2021
11. Based on another CPUC determination (specify):	See below	Noted
12. Has the Intervenor demonstrated significant financial hardship?		Yes

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

	INTERVENOR	CPUC VERIFICATION
Timely request for compensation (§1804(c)):		
13. Identify Final Decision:	D.25-08-049	Verified
14. Date of issuance of Final Order or Decision:	August 29, 2025	Verified
15. File date of compensation request:	October 28, 2025	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	INTERVENOR’S COMMENT(S)	CPUC DISCUSSION
	CforAT has previously been awarded compensation for work in this proceeding, including our substantial contribution to D.23-04-040, D.24-01-032 and D.24-05-028. <i>See</i> D.25-03-023. “A party found eligible for an award of compensation in one phase of a proceeding remains eligible in later phases, including any rehearing, in the same proceeding.” Rule 17.2, CPUC Rules of Practice and Procedure.	Noted
	<p>This compensation request includes time spent related to the implementation of the Income-Graduated Fixed Charge as authorized in D.24-05-028, which necessarily took place after that decision was issued. The Track B Decision which triggered the deadline for filing this compensation request also closes the proceeding. Rule 17.3 of the Commission’s Rules of Practice and Procedure authorizes intervenors to file a request for an award of compensation within 60 days after a decision closing a proceeding is issued. Because all of CforAT’s work on efforts to implement the initial version of the fixed charge are within the scope of this proceeding (and directed by the provisions of D.24-05-028), CforAT submits that the closure of the proceeding authorizes this request for compensation for time spent on these implementation issues. If the Commission determines that this time is not appropriate to consider for compensation in this proceeding, CforAT respectfully requests guidance on where it can properly be submitted, given that it was work done at the direction of a Commission decision for important policy actions.</p> <p>As noted below, CforAT is not seeking compensation at this time for work done in the Process Working Group, also formed in compliance with D.24-05-028, because we expect that the recommendations and proposals developed by that working group will be considered in a successor proceeding and that stakeholders will be authorized to seek compensation for time spent working with the Process Working Group in that successor proceeding.</p>	Noted; CforAT’s claimed implementation-related work conducted pursuant to D.24-05-028 falls within scope of this proceeding. The Commission finds that such efforts, including CforAT’s claimed RTP work, encompassing both Track B related and earlier RTP working group participation, are considered here and are compensable to the extent they reflect a substantial contribution and are reasonable and non-duplicative.

PART II: SUBSTANTIAL CONTRIBUTION

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

INTERVENOR’S CLAIMED CONTRIBUTION(S)	SPECIFIC REFERENCES TO INTERVENOR’S CLAIMED CONTRIBUTION(S)	CPUC DISCUSSION
<p><u>Overview of Participation:</u></p> <p>In this proceeding, CforAT has focused on the adoption and implementation of the income-graduated fixed charge (IGFC, subsequently renamed the Basic Services Charge or BSC), addressed in Track A of this proceeding, and the elements of Demand Flexibility Rates (DF Rates) that most directly impact issues of equity and customer understanding, addressed in Track B of this proceeding. This includes participation in the Track B Working Group 1.</p> <p>Our participation in Track B Working Group 1 is addressed and included in this compensation request. CforAT noted in our previous compensation request that time spent on DF Rates (also called RTP Rates, and the Working Group efforts were identified as RTP Working Group) was not included, as those issues had not yet been addressed in a Commission Decision.</p> <p>Since the adoption of the Fixed Charge Decision, D.24-05-028, CforAT has also participated in both the authorized BSC Implementation Working Group and the BSC Process Working Group, each of which was specifically authorized and charged with various tasks in that Decision. As detailed below, work with the BSC Implementation Working Group is included in this request for compensation, while work in the BSC</p>		<p>Noted</p>

<p>CforAT was an active participant in Working Group 1 of Track B, whose efforts are reflected throughout the Track B Decision. As noted, “Working Group 1 participants include[ed] representatives from investor-owned utilities (IOUs), community choice aggregators (CCAs), consumer advocacy groups, device manufacturers, third-party providers, and other potential stakeholders...” Track B Decision at p. 9. The work of this group was compiled into a report, including various rate design proposals and participant comments. <i>Id.</i></p> <p><i>Two Part Subscription Tariffs:</i> CforAT noted that low-income households, who move more frequently and have more fluid membership than non-low-income households, might be difficult to map to appropriate load-shape subscriptions, which might risk high bill volatility for such households on a DF rate. Track B Decision at p. 108, citing Working Group Report at p. 26.</p> <p><i>Customer Protections:</i> CforAT demanded increased bill protection options, particularly regarding third-party management of customer bills, and noted the risk of under-collection from customers selecting a DF rate due to self-selection, which would create challenges for expanding a program more broadly. Track B Decision at p. 110, citing Working Group Report at p. 93.</p> <p><i>Comments on Equity and Access:</i> As noted in the Track B Decision, CforAT expressed concern about the JOIN IOU proposal on ME&O, “calling into question how ‘specifically targeted ME&O’ and the potential for ‘targeted</p>	<p>liberally throughout the Track B decision, demonstrating that the work of the Working Group members substantially contributed to the decision. CforAT’s input to the Working Group Report can be found separately identified for each of the key issues impacting our constituency.</p> <p>The Track B Decision finds that “two-part subscription tariffs may provide an effective balance of customer protection, revenue recovery stability and preservation of price signals. Track B Decision at p. 113. At the same time, the Track B Decision “acknowledge[s] CforAT’s concerns that Staff’s two-part subscription tariff proposal relies heavily on historic usage data that may not reflect low-income customer characteristics such as variation in household number, customer mobility, inelastic demand, and inability to shift load.” Track B. Decision at p. 116. While finding that many customers, including vulnerable customers might benefit, “we do note that two-part subscriptions may not be a viable customer protection option for some low-income customers with higher mobility or that live in households with a variable number of residents. In these scenarios, it may be difficult to determine the historical load upon which a two-part subscription would be developed.” Track B. Decision at p. 116. For this reason, among others, “we do not find sufficient</p>	<p>Verified</p> <p>Verified. We note that CforAT raised concerns regarding the application of two-part subscription tariffs to low-income customers, including challenges related to household variability, customer mobility, and the use of historical usage data, and the need for adequate customer</p>
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<p>incentives’ would be implemented; and with the staff’s proposal because it does not address the challenges associated with the up-front cost of DERs and customer protections.” Track B Decision at p. 124, citing Working Group Report at pp. 32-33.</p> <p>CforAT also expressed concerns about DF Rate Proposal impacts on low-income communities, including the fact that such rates are unlikely to impact EV adoption or address landlord/tenant issues that need to be resolved before upgrades can be installed. Track B Decision at p. 124. The Decision further notes CforAT’s concern that neither the Microgrid RC’s proposal nor the Staff proposal adequately address DF challenges faced by low-income communities or methods to alleviate barriers to participation. Track B. Decision at pp. 124-125.</p>	<p>evidence from the record to require that Large IOUs must include two-part subscription tariffs as a part of their initial DF rate proposals. However, it is reasonable to require that the Large IOUs must include appropriate customer protection options that provide bill and revenue stability benefits for each customer class in their DF Rate Proposals.” Track B Decision at p. 117.</p> <p>In providing guidance on equity and access issues for DF rates, the Track B Decision noted the need to gather more information about how low-income and DAC customers might be served by DF rates, including study efforts to understand how to “increase their enrollment, enhance their usage behavior (i.e. conservation or load shifting), reduce bill impacts, and experience bill savings from DF rate programs.” Track B Decision at p. 129. To obtain more information, which will in part be used to consider concerns raised by CforAT, the Track B Decision directs PG&E and SCE to submit a plan for their expanded pilots to better allow them to identify and address the needs of low-income and DAC customers who may have an interest in subscribing to DF rates. Track B Decision at p. 130.</p>	<p>protections. While the Commission did not adopt CforAT’s specific recommendations, D.25-08-049 reflects these concerns, noting that such tariffs may not be viable for certain low-income customers. We find CforAT’s participation here substantially contributed to the record.</p> <p>Verified</p>
<p><u>IGFC Implementation:</u> <i>Advice Letters and Resolutions:</i> CforAT protested the various IOU Implementation Advice Letters in fall of</p>	<p>While the Commission declined to establish Tier 1 fixed charge enrollment by eligibility rather than enrollment in CARE, it did</p>	<p>Verified</p>

<p>2024 and commented on the various resolutions.</p> <ul style="list-style-type: none"> • CforAT Protest to PG&E Advice Letter 7351-E SCE Advice Letter 5358-E, and SDG&E Advice Letter 4492-E, Pursuant to Ordering Paragraph 3(C) of D.24-05-028 Regarding Implementation of the Income-Graduated Fixed Charge, submitted on September 3, 2024; • CforAT Comments on Draft Resolution E-5355 (SDG&E), submitted December 5, 2024; • CforAT Comments on Draft Resolution E-5356 (SCE), submitted on December 5, 2024; and • CforAT Comments on Draft Resolution E-5354 (PG&E), submitted December 5, 2024. <p>These comments generally addressed CforAT’s recommendations for default customers who are eligible for CARE or FERA, but not enrolled in either program, to be defaulted to a low-income tier and our recommendations to make improvements in planned ME&O efforts to better reach and effectively educate vulnerable and hard-to-reach population groups.</p> <p><i>BSC Implementation Working Group Participation:</i></p> <p>The Implementation Working Group created in D.24-05-028 and repeatedly referenced in the various resolutions implementing the first iteration of the fixed charge for each of the large IOUs has been an important forum for the development of an implementation plan and for ongoing review of implementation efforts. CforAT submits that it is reasonable to seek compensation in this request for time spent in a Working Group formed at the Commission’s direction and repeatedly</p>	<p>note that the Fixed Charge Decision created an Implementation Working Group to evaluate the fixed charge implementation process to create and review metrics and evaluate lessons learned. “Stakeholders are strongly encouraged to further suggest modifications to Large Utilities’ fixed charge processes which can be incorporated into future phases of the fixed charge.” Res. E-5356 (SCE) at pp. 25-26; Res. E-5355 (SDGE) at pp. 31-32;</p> <p>The Commission indicated that the Resolutions direct the utilities to demonstrate compliance with accessibility standards in their ME&O presentations to the Implementation Working Group before initiating communications with customers and implementing the fixed charge. Res. E-5356 (SCE) at p. 55; Res. E-5355 (SDGE) at pp. 67-68. PG&E specifically responded to CforAT’s comments about its planned ME&O by clarifying its plan and providing a summary of its integrated campaign plan,</p> <p>Resolution E-5354 at p. 45, which the Commission accepted as reasonable. SCE specifically agreed to explore targeted messages to customers likely eligible for CARE or FERA and present finding in future working group meetings. Res. E-5356 at p. 16.</p> <p>While the Track B Decision closing the proceeding does not</p>	<p>Verified</p>
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<p>referenced as the appropriate forum for ongoing review and evaluation of the BSC implementation process. To the extent that the Commission disagrees that this compensation request is an appropriate forum for consideration of time spent in the Implementation Working Group Process, CforAT requests that the Commission expressly indicate that time spent in this working group should carry over to the planned successor proceeding on BSC issues.</p>	<p>directly address work of the Implementation Working Group, the ongoing efforts to roll out the BSC as ordered in D.24005-028³ have relied substantially on the input and participation of the working group members. Because this work was necessarily related to the scope of this proceeding and because the Track B decision closes the proceeding, it is appropriate for CforAT to seek compensation for this work here. To the extent that the Commission determines that this necessary work, which stakeholders were asked to participate in, is not appropriate for compensation here, we ask that the Commission provide guidance for the appropriate forum for seeking such compensation, as CforAT would experience financial hardship and be unable to participate in this type of stakeholder process without the availability of intervenor compensation.</p>	
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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: Track B Issues: CforAT worked collaboratively with all other members in Working Group 1 and specifically shared some <u>positions with other advocates</u> such as Cal Advocates, UCAN,</p>		<p>Noted</p>

³ D.24-05-028.

<p>350 Bay Area, and SBUA. CforAT also shared positions such as concerns about customer understanding and complexity with other organizations such as CalCCA and CLECA. Even parties such as MRC that did not generally take similar positions to CforAT recognized the importance of the issues raised by CforAT’s input in the Working Group process.</p> <p>IGFC Implementation Issues: TURN and NRDC jointly raised important issues of ME&O regarding the fixed charge for hard-to-reach customers, which was similar to a key position taken by CforAT.</p>	
<p>d. Intervenor’s claim of non-duplication:</p> <p>As the proceeding has advanced, CforAT has continued to work diligently to avoid duplicating efforts of other parties, including by direct coordination where appropriate and by maintaining focus on those areas of particular concern to our unique constituency of utility customers with disabilities and medical needs.</p> <p>Even in areas where CforAT’s overall position was similar to that of other parties, CforAT’s focus on our specific constituency and their needs ensured that we provided a unique perspective and focus to ensure that the Commission directed appropriate attention to a vulnerable group of customers with concerns about energy use that are specific to their situation.</p> <p>In both the RTP Working Group and the Implementation Working Group, the Commission specifically sought a broad range of perspectives to best inform the policy decisions and consumer impacts under consideration.</p>	<p>Noted; CforAT’s claimed implementation-related work conducted pursuant to D.24-05-028 falls within scope of this proceeding. The Commission finds that such efforts, including CforAT’s claimed RTP work, encompassing both Track B related and earlier RTP working group participation, are properly considered here and are compensable to the extent they reflect a substantial contribution and are reasonable and non-duplicative.</p>

C. Additional Comments on Part II:

#	INTERVENOR’S COMMENT	CPUC DISCUSSION
	<p>If the Commission determines that certain issues addressed above were not yet fully addressed by the Commission and thus declines to consider the extent of CforAT’s contribution, CforAT requests a formal finding noting that work continues on various matters and direct instruction that the time spent on such issues may be carried over to a successor proceeding for</p>	<p>Noted; CforAT’s claimed implementation-related work conducted pursuant to D.24-05-028 falls within scope of this proceeding. The Commission finds that such efforts, including CforAT’s claimed RTP work, encompassing both Track B related and earlier RTP working group participation, are properly considered here and are compensable to the extent they reflect a substantial contribution and are reasonable and non-duplicative.</p>

#	INTERVENOR’S COMMENT	CPUC DISCUSSION
	<p>consideration in a future compensation request.</p> <p>For Track B issues, this may include issues related to Working Group 2 (see Track B Decision at p. 13, noting that “the Commission may consider the new Staff recommendations related to Working Group 2 issues in a future proceeding) and issues related to the fixed charge.</p> <p>For the Fixed Charge, to the extent that the Commission determines that compensation for implementation work is not appropriate in this docket, this time should be expressly allowed to carry over to the anticipated successor proceeding on the BSC. CforAT also requests specific instructions about carrying over time spent on the Process Working Group authorized by the Fixed Charge Decision to the anticipated successor proceeding.</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>This proceeding continues to address fundamental changes in the ways that utility customers pay for electricity, with the intent of supporting fundamental changes in the way that they understand and use electricity in support of California’s clean energy goals. The issues under consideration in this portion of the proceeding, including implementation of the new fixed charge and ongoing movement toward the introduction of demand flexibility rates, are important for customer groups with particular challenges surrounding their relationship with energy use like CforAT’s constituency of customers with disabilities and medical needs, is extremely high. For this reason, and to ensure that the needs of this unique</p>	<p>Noted; CforAT’s claimed implementation-related work conducted pursuant to D.24-05-028 falls within scope of this proceeding. The Commission finds that such efforts, including CforAT’s</p>

	CPUC DISCUSSION
<p>constituency are addressed in all aspects of this Rulemaking, it is appropriate that CforAT has continued to expend substantial resources in participation, including active work in the ongoing working group processes and participation in the development of guidance for demand flexibility rates.</p> <p>While it is difficult to attribute a specific dollar value to any of CforAT’s contributions, the overall input of CforAT has been in support of ensuring that our constituency is not inappropriately burdened through the changes in the way that customers pay for electricity, that their needs are regularly given consideration, and that they are appropriately situated to participate in and benefit from the clean energy transition that is the goal of this proceeding. In this context, the support provided by CforAT for the Commission’s efforts to effectuate an appropriate and equitable change in the structure of energy use in California exceeds the amount of compensation we are requesting.</p>	<p>claimed RTP work, encompassing both Track B related and earlier RTP working group participation, are properly considered here and are compensable to the extent they reflect a substantial contribution and are reasonable and non-duplicative.</p>
<p>b. Reasonableness of hours claimed:</p> <p>CforAT’s ongoing work in this docket is reasonable based on the importance of the issues under consideration and their potential impact on our constituency of utility customers with disabilities and medical needs, particularly given that this group of customers is both disproportionately low-income and highly reliant on dependable and affordable access to electricity.</p> <p>CforAT’s work continued to be led by Legal Director Melissa W. Kasnitz, who has substantial experience in addressing issues of rate design and implementation of rate changes as they impact CforAT’s constituency. As appropriate, Ms. Kasnitz delegated specific tasks to junior attorneys, including first Legal Fellow Alexandra Green, then her successor Rachel Sweetnam. While Ms. Kasnitz appropriately supervised and reviewed the work of the junior attorneys, this type of delegation is appropriate and efficient, particularly in light of the substantial differences in the hourly rates for the junior attorneys and Ms. Kasnitz. For example, Ms. Sweetnam served as CforAT’s representative on the BSC Implementation Working Group, while Ms. Kasnitz served as CforAT’s representative on the Process Working Group (which is not included in the request).</p> <p>Overall, CforAT was effective and efficient in our participation in the various portions of this proceeding, and our work remained focused on the needs of our unique constituency. To the extent that our work overlapped to some degree with that of other parties, this reflects the shared effort of multiple stakeholders to provide vital input on the important issues under consideration. CforAT’s contributions should not be reduced on this basis.</p>	<p>Noted; CforAT’s claimed implementation-related work conducted pursuant to D.24-05-028 falls within scope of this proceeding. The Commission finds that such efforts, including CforAT’s claimed RTP work, encompassing both Track B related and earlier RTP working group participation, are properly considered here and are compensable to the extent they reflect a substantial contribution and are reasonable and non-duplicative.</p>

	CPUC DISCUSSION
<p>c. Allocation of hours by issue:</p> <p style="text-align: center;">Kasnitz Time – 2022 (2.6 hours)</p> <p>RTP: 0.8 hours</p> <p>The issue area “RTP” includes time spent addressing issues of Real Time Pricing, also described as demand flexibility rates.</p> <p>RTP-WG: 1.8 hours</p> <p>The issue area “RTP-WG” includes time spent participating in Working Group 1 addressing RTP rate issues, including attending meetings, reviewing material, and commenting on material in the eventual Working Group Report.</p> <p style="text-align: center;">Green Time – 2022 (1.6 post-admission hours)</p> <p>RTP – WG: 1.6 hours (100%)</p> <p style="text-align: center;">Kasnitz Time – 2023 (40.6 hours)</p> <p>RTP: 1.6 hours (4%)</p> <p>RTP – WG: 39.0 hours (96%)</p> <p style="text-align: center;">Green Time – 2023 (23.6 hours)</p> <p>RTP – WG: 23.6 hours (100%)</p> <p style="text-align: center;">Woodford Time – 2023 (1.5 hours)</p> <p>RTP WG: 1.5 hours (100%)</p> <p style="text-align: center;">Kasnitz Time – 2024 (22.0 hours)</p> <p>General Participation: 1.3 hours (6%)</p> <p>The issue area “General Participation” includes time spent on procedural matters, review of material as needed to comply with requirements for professional responsibility to stay knowledgeable about activity taking place within the proceeding, and activity that does not otherwise fit into any specific issue area.</p> <p>Implementation: 13.6 hours (62%)</p> <p>The issue area “Implementation” includes time spent responding and otherwise participating in activity surrounding Advice Letters and Resolutions addressing implementation of the first generation income-graduated fixed charge or basic services charge.</p> <p>RTP: 7.1 hours (32%)</p> <p style="text-align: center;">Sweetnam Time – 2024 (6.6 hours)</p> <p>RTP: 6.6 hours (100%)</p>	<p>Noted, totals 100%</p> <p>CforAT’s claimed implementation-related work conducted pursuant to D.24-05-028 falls within scope of this proceeding. The Commission finds that such efforts, including CforAT’s claimed RTP work, encompassing both Track B related and earlier RTP working group participation, are properly considered here and are compensable to the extent they reflect a substantial contribution and are reasonable and non-duplicative.</p>

	CPUC DISCUSSION
Kasnitz Time – 2025 (17.2 hours)	
General Participation: 3.8 hours (22%)	
Implementation: 2.0 hours (12%)	
Implementation WG: 1.2 hours (7%)	
PD: 6.6 hours (38%)	
Rehearing: 2.2 hours (13%)	
RTP: 1.4 (8%)	
Sweetnam Time – 2025 (23.3 hours)	
General Participation: 0.1 hours (<1%)	
Implementation WG: 21.3 hours (91%)	
PD: 1.5 hours (6%)	
Rehearing: 0.4 hours (2%)	
Woodford Time – 2025 (2.0 hours)	
Implementation WG: 2.0 hours (100%)	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Melissa W. Kasnitz	2022	2.6	\$690	D.23-03-030	\$1,764 [7]	2.24 [5]	\$690.00	\$1,545.60
Melissa W. Kasnitz	2023	40.6	\$715	D.24-06-018	\$29,029	35.30 [5]	\$715.00	\$25,239.50
Melissa W. Kasnitz	2024	22	\$735	D.24-10-028	\$16,170	21.34 [4, 5]	\$735.00	\$15,684.90
Melissa W. Kasnitz	2025	17.2	\$755	See below	\$12,986	16.30 [4, 5]	\$755.00 [1]	\$12,306.50
Alexandra Green	2022	1.6	\$200	D.24-08-059 (setting post-admission rate)	\$320	1.28 [5]	\$200.00	\$256.00
Alexandra Green	2023	23.6	\$220	D.24-09-018	\$5,192	18.88 [5]	\$220.00	\$4,153.60

CLAIMED						CPUC AWARD		
Rachel Sweetnam	2024	6.4	\$240	D.25-04-041	\$1,536	6.40	\$240.00	\$1,536.00
Rachel Sweetnam	2025	23.4 [7]	\$275	See below	\$7,440 [7]	19.31 [5]	\$275.00 [2]	\$5,310.25
Kate Woodford	2023	1.5	\$280	D.24-06-020	\$420	1.50	\$280.00	\$420.00
Kate Woodford	2025	2.0	\$380	See below	\$760	2.00	\$300.00 [3]	\$600.00
Subtotal: \$75,617 [7]						Subtotal: \$67,052.35		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Melissa W. Kasnitz	2025	10.4	\$377.50	½ standard rate, see below	\$3,926	8.00 [6]	\$377.50 [1]	\$3,020.00
Subtotal: \$3,936						Subtotal: \$3,020.00		
TOTAL REQUEST: \$79,543 [7]						TOTAL AWARD: \$70,072.35		
<p>*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.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer’s normal hourly rate</p>								
ATTORNEY INFORMATION								
Attorney	Date Admitted to CA BAR ⁴		Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation				
Melissa W. Kasnitz	1992		162679	No				
Alexandra Green	12/2/2022		346771	No				
Rachel Sweetnam	2023		350075	No				

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

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

ATTACHMENT OR COMMENT #	DESCRIPTION/COMMENT
1	Certificate of Service
2	Time Records
	Kasnitz Rate for 2025: CforAT has previously requested a 2025 hourly rate of \$760 for Legal Director Melissa W. Kasnitz. While no final decision has yet set a rate, a currently pending compensation PD in R.18-03-011 (set to be addressed at the Commission Voting Meeting scheduled for 10/30) would set the rate at \$755 per hour. CforAT presumes that this rate will be adopted and used for work performed by Ms. Kasnitz in 2025.
	Sweetnam Rate for 2025: CforAT has previously requested a 2025 hourly rate of \$350 for Staff Attorney Rachel Sweetnam. While no final decision has yet set a rate, a currently pending compensation PD in R.18-03-011 (set to be addressed at the Commission Voting Meeting scheduled for 10/30) would set the rate at \$275 per hour. CforAT presumes that this rate will be adopted and used for work performed by Ms. Sweetnam in 2025.

D. CPUC Comments, Disallowances, and Adjustments

ITEM	REASON
[1] Melissa Kasnitz (Kasnitz) 2025 Hourly Rate	D.25-10-060 previously approved the rate of \$755.00 for Kasnitz in 2025. As Intervenor Compensation Claim Preparation hours are compensated at ½ preparer’s normal hourly rate, we apply the rate of \$377.50 for Kasnitz in 2025.
[2] Rachel Sweetnam (Sweetnam) 2025 Hourly Rate	D.25-10-060 previously approved the rate of \$275.00 for Sweetnam in 2025.
[3] Kate Woodford (Woodford) 2025 Hourly Rate	D.25-07-028 adopted a 2024 hourly rate of \$290.00 for Woodford. In Part III.B, CforAT requested an hourly rate of \$380.00 with a basis for this rate of “see below.” However, CforAT does not provide any further explanation for this requested rate in this claim. We therefore apply the 3.46% escalation from Resolution ALJ-393 to establish a 2025 hourly rate of \$300.00
[4] Melissa Kasnitz (Kasnitz) 2024 & 2025 Hours	<u>Vague Hours (0.40 hours):</u> Time records for each individual included in the Claim must be provided and must chronologically list the following information, among other things, about each task included in the records: 1) date when the specific task was performed, 2) the issue in the proceeding that the task addressed (as identified in the Scoping Memo or by the ALJ), 3) description of the specific task, and 4) amount of the

ITEM	REASON
	<p>time spent on the task (in hours or hour fraction). See IComp Program Guide at 25.</p> <p>The following tasks are deemed as vague and are therefore disallowed:</p> <ul style="list-style-type: none"> • 9/30/24 - Review comments re: tool & budget, 0.20 hours. This entry is listed under the general participation issue area and is too vague and unclear to discern how it substantially contributed to the decision-making process. 0.20 hours are disallowed. <p>Minus the disallowance here of 0.20 hours, Kasnitz’s 2024 hours now total 21.80.</p> <p>The following tasks are deemed as vague and are therefore disallowed:</p> <ul style="list-style-type: none"> • 9/3/25 - Review & edit letter re: obvious error, 0.20 hours. This entry does not discern which letter was edited, and we cannot discern how it substantially contributed to the decision-making process. 0.20 hours are disallowed. <p>Minus the disallowance here of 0.20 hours, Kasnitz’s 2025 hours now total 17.00.</p>
<p>[5] Internal Duplication & Excessive Hours Claimed</p>	<p>CforAT claims a total of 79.94 hours for work in this proceeding relating to internal correspondence through conferring and internal updates, as well as attending workshops, working groups and webinars, and associated material preparation and review, which accounts for 56% of the hours claimed by CforAT and reflect internal duplication and excessive hours claimed. Such work should have been sufficiently streamlined to promote efficiency and to prevent an excess of hours claimed. <i>See</i> D.07-12-007.</p> <p>The Commission has previously stated, we “compensate [for] efficient effort that contributed to the proceeding’s outcomes . . . [and] disallow [] inefficient activities and appl[y]reductions to [intervenor’s] hours that reflected excessive internal duplicative efforts, such as numerous internal communications, review of each other’s documents, working on the same materials, engaging in the same tasks and participating in the same events.” <i>See</i> D.12-03-024 at 24.</p> <p>For the internal duplication and excessiveness noted here, we determine that a 20 percent reduction of these hours is appropriate.</p> <p>The following hours are reduced, representing the 20 percent reduction of hours claimed by CforAT:</p> <ul style="list-style-type: none"> • Kasnitz - 6.82 hours for work related to these issues between 2022-2025. • Green – 5.04 hours for work related to these issues between 2022-2023. • Sweetnam – 4.13 hours for work related to these issues in 2025.
<p>[6] Excessive IComp Claim Preparation Hours</p>	<p>Section 1801.3(f) provides that the Commission should administer the Intervenor Compensation Program “in a manner that avoids unproductive or unnecessary participation that duplicates the participation of similar interests otherwise adequately represented or participation that is not necessary for a fair determination of the proceeding.”</p> <p>We find the request for 10.40 hours to prepare CforAT’s Intervenor Compensation Claim by Kasnitz to be excessive given the scope of issues and overall scale of the request. Hours claimed must be reasonable, productive,</p>

ITEM	REASON
	<p>effective, and efficient. We find that the hours claimed are excessive for the work produced and for breadth of this claim.</p> <p>As a result, we have reduced Kasnitz’s time spent preparing this IComp Claim by 2.40 hours, resulting in a total of 8.00 hours awarded.</p>
<p>[7] Incorrect Hours/Dollar Amounts Provided</p>	<p>CforAT has made calculation errors above in Part III.B. Based on time records provided by CforAT, the correct dollar amounts and hours claimed are as follows:</p> <ul style="list-style-type: none"> • Kasnitz’s 2022 total dollar amount claimed was \$1,794.00. • Sweetnam’s 2025 total dollar amount claimed was \$6,446.00. Sweetnam’s 2025 time records indicate a total of 23.44 hours for 2025. <p>CforAT’s subtotal for non-IComp Claim Preparation claimed hours was \$74,653.00. CforAT’s total request for compensation should have added to \$78,579.00. Upon review of the CforAT documents filed in support of its ICOMP Claim, the Commission is reducing CforAT’s requested amount to \$70,072.35, to reflect the adjusted hourly rates and disallowances assessed here in Part III.D.</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

1. Center for Accessible Technology has made a substantial contribution to D.25-08-049, Advice Letters and Resolution E-5354, Resolution E-5355 and Resolution E-5356.
2. Center for Accessible Technology’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 \$70,072.35.

CONCLUSION OF LAW

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

ORDER

1. Center for Accessible Technology is awarded \$70,072.35.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Bear Valley Electric Service, Inc., Liberty Utilities, and PacifiCorp shall pay Center for Accessible Technology their respective shares of the award, based on their California-jurisdictional electric revenues for the 2023 calendar year, to reflect the year in which the proceeding was primarily litigated. If such data are unavailable, the most recent electric revenue data shall be used. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning January 11, 2026, the 75th day after the filing of Center for Accessible Technology'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 and did not participate in the vote of this item. Commissioner Christine Harada being absent did not participate in the vote of this item.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D2607021	Modifies Decision?	No
Contribution Decision(s):	D2508049 and IGFC Implementation Process, including Advice Letters and Resolution E-5354, Resolution E-5355 and Resolution E-5356		
Proceeding(s):	R2207005		
Author:	ALJ Carolyn Sisto		
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Bear Valley Electric Service, Inc., Liberty Utilities, and PacifiCorp		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Center for Accessible Technology	October 28, 2025	\$79,543 [7]	\$70,072.35	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
Melissa	Kasnitz	Attorney	\$690.00	2022	\$690.00
Melissa	Kasnitz	Attorney	\$715.00	2023	\$715.00
Melissa	Kasnitz	Attorney	\$735.00	2024	\$735.00
Melissa	Kasnitz	Attorney	\$755.00	2025	\$755.00
Alexandra	Green	Attorney	\$200.00	2022	\$200.00
Alexandra	Green	Attorney	\$220.00	2023	\$220.00
Rachel	Sweetnam	Attorney	\$240.00	2024	\$240.00
Rachel	Sweetnam	Attorney	\$255.00 ⁵	2025	\$275.00
Kate	Woodford	Analyst	\$280.00	2023	\$280.00
Kate	Woodford	Analyst	\$380.00	2025	\$300.00

⁵ While CforAT lists an Hourly Fee Requested here of \$255.00 for Sweetnam, CforAT requests an hourly rate of \$275.00 for Sweetnam above in Parts III.B and III.C.