ALJ/RL8/abb **Date of Issuance 7/21/2026**

Decision 26-07-056 July 16, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application Of Southern California Edison Company (U 338-E) For Authority To Increase Its Authorized Revenues For Electric Service In 2025, Among Other Things, And To Reflect That Increase In Rates.	Application 23-05-010 (Filed May 12, 2023)

NOT CONSOLIDATED

Application of Southern California Edison Company (U 338-E) Regarding 2022 Risk Assessment Mitigation Phase.	Application 22-05-013 (Filed May 13, 2022)

DECISION GRANTING COMPENSATION TO MUSSEY GRADE ROAD ALLIANCE FOR SUBSTANTIAL CONTRIBUTIONS TO DECISIONS (D.) 23-11-007 AND D.25-09-030

Intervenor: Mussey Grade Road Alliance	**For contribution to Decision (D.) 25-09-030, D.23-11-007**
Claimed: $154,013[1]	**Awarded:** $147,592.92
Assigned Commissioner: Karen Douglas[2]	**Assigned ALJs:** Colin Rizzo, Ehren Seybert, and Rafael Lirag[3]

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	DECISION ON TEST YEAR 2025 GENERAL RATE CASE FOR SOUTHERN CALIFORNIA EDISON COMPANY DECISION CLOSING RISK ASSESSMENT MITIGATION PHASE

[1] MGRA's total request should be $154,055.12, as discussed in the footnotes of Part III.B.

[2] Commissioner Karen Douglas was assigned to A.22-05-013 on April 22, 2026.

[3] ALJ Rafael Lirag is the assigned ALJ to A.22-05-013.

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812[4]:

	INTERVENOR	CPUC VERIFICATION
Timely filing of notice of intent to claim compensation (NOI) (§1804(a)):		
1. Date of Prehearing Conference:	8/15/22 A.22-05-013 7/12/23 A.23-05-010	Verified: A.22-05-013 Verified: A.23-05-010
2. Other specified date for NOI:		
3. Date NOI filed:	9/7/22 A.22-05-013 8/5/23 A.23-05-010	Verified: A.22-05-013 8/8/23: A.23-05-010
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:	D.25-04-013 at 2-3 in A.24-01-023	A.22-05-015 et al
6. Date of ALJ ruling:	Issuance: 4/10/25	1/25/23
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:	D.25-04-013 at 2-3 in A.24-01-023	A.22-05-015, *see* Part I.C.2
10. Date of ALJ ruling:	Issuance: 4/10/25	3/19/26, *see* Part I.C.2
11. Based on another CPUC determination (specify):		D.26-03-041 *see* Part I.C.2
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§1804(c)):		
13. Identify Final Decision:	D.25-09-030 D.23-11-007	D.25-09-030. See Part I.C.1
14. Date of issuance of Final Order or Decision:	9/23/25 11/15/23	9/23/25, See Part I.C.1
15. File date of compensation request:	10/15/25	Verified
16. Was the request for compensation timely?		Yes

[4] All statutory references are to California Public Utilities Code unless indicated otherwise.

C. Additional Comments on Part I:

#	INTERVENOR'S COMMENT(S)	CPUC DISCUSSION
1	MGRA is consolidating the compensation claims for SCE's RAMP and GRC proceedings as has become practice for RAMP proceedings and has been specifically allowed in D.23-11-007 at p. 13.	Verified. D.23-11-007 states: "Regarding TURN's comment in its September 15, 2023 Response about allowing intervenors to carry forward hours and costs from this proceeding to SCE's GRC, the Commission has allowed this in prior RAMPs, and we find no reason to deviate from this practice."
2		On January 25, 2023, we issued a ruling in A.22-05-015 et al that found MGRA had not demonstrated significant financial hardship, but allowed MGRA to "demonstrate significant financial hardship in its next intervenor compensation claim filed before the Commission."[5] MGRA filed an intervenor compensation claim in A.22-05-015 et al on March 5, 2025, with the information requested by ALJ Lakhanpal's ruling. The Commission reviewed MGRA's new information and found in Decision (D.) 26-03-041 that MGRA had significant financial hardship and was eligible to claim intervenor compensation. It is reasonable to apply this finding to MGRA's eligibility in this proceeding.

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
1. **Note:** **For definition of contribution types, see Comment 1 in Section C.** **For definition of issue, see Comment 2 in Section C.**		Noted
2. MGRA provided technical data, analysis, and argument resulting in several different design scenarios showing that	FD; p. 363-4 – "MGRA asserts significant savings could be obtained by deploying covered conductor and advanced technologies in place of undergrounding, but similarly does	Verified

[5] A.22-05-015, "Administrative Law Judge's Ruling on Mussey Grade Road Alliance's Showing of Significant Financial Hardship" at 7-8, January 25, 2023.

SCE's undergrounding proposal was cost-inefficient and arguing for a much larger fraction of covered conductor. One of MGRA's suggested scenarios was replace 2/3 of SCE's requested undergrounding with covered conductor, which is very close to what was decided in the Final Decision based on TURN's proposal. MGRA's analysis provided a rebuttal to SCE's assertion that the TURN results were dependent on its risk ranking method. **Type: Complimentary** **Issue: Hdn**	not recommend an alternative capital forecast for the TUG program.1361 1361 MGRA's projected, potential savings are based on different scenario analyses, including Severe Risk Areas mitigated by covered conductor; a scenario with covered conductor and REFCL; and a scenario where all of SCE's HFRAs are hardened. MGRA states these scenarios are designed to demonstrate the impact of changing system assumptions, and are not intended to be actual, implementable proposals. (Ex. MGRA-01 at 81-98). p. 379 – "we agree with TURN and other intervenors that the scope of SCE's TUG program should be scoped to address the highest risk miles, with remaining risk reductions achieved through more cost-effective grid hardening measures, mainly the deployment of covered conductor."	Verified
	p. 392-3 – "This more optimized mix of mitigations is also consistent with the cost-effectiveness concerns raised by TURN, Cal Advocates, SBUA, MGRA, and EPUC in this proceeding." GRC-MGRA-PD-Rpl; p. 1 – "As noted in MGRA's Comments, MGRA modeled a scenario with similar impacts to the TURN and PD proposals, changing roughly 2/3 of Edison's original proposed undergrounding to covered conductor. However, MGRA's model did not use any risk ranking to choose circuits for its example but rather drew from randomly selected CC and TUG circuits in order to avoid any selection bias." GRC-SCE-JCE; p. 171 – "MGRA proposes a variety of scenarios including a combination of various components: 1) a significant reduction in the TUG program (MGRA proposes 2/3) with circuits slated for TUG receiving covered conductor instead 2) that rather than ramping down the covered conductor program and replacing it with TUG as SCE plans, SCE continues its WCCP until	We verify this citation, however, the correct location is at 382-83. Verified We verify that this citation is from SCE-42, the Joint Comparison Exhibit (JCE).

	its entire HFRA is hardened by 2028 3) a more extensive deployment of REFCL and advanced technologies… (MGRA-01E; Tables 19-21) SCE (MGRA - Total to 2028, assumes $3M/mi TUG): 3,796,383 MGRA vs SCE (lowest cost option): (1,644,452) MGRA (lowest cost option): 2,151,931 MGRA vs SCE (greatest risk reduction option): (955,511) MGRA (greatest risk reduction option): 2,840,872 MGRA-01E1, pp. 89-97”	
3. MGRA extensively analyzed and opposed SCE’s Integrated Wildfire Mitigation Strategy (IWMS) framework, which SCE proposed using as an alternative to risk based-decision making when determining mitigations. MGRA had opposed SCE’s proposal in the RDF proceeding and brought it to the attention of other intervenors in the SCE RAMP and GRC proceedings. MGRA noted that IWMS was a qualitative heuristic model that in some cases (particularly for high wind areas) compensated for flaws in SCE’s MARS risk model. MGRA also observed that with IWMS SCE effectively adopts a “zero-tolerance” risk policy in contravention of Commission precedent. **Type: Initiator** **Topic: IWMS**	FD; p. 21 – “MGRA asserts that: (1) SCE’s Integrated Wildfire Mitigation Strategy (IWMS) has not been demonstrated to be a risk model, though in some cases it provides a heuristic that compensates for flaws in SCE’s MARS wildfire risk model..” FD; p. 375 – “SCE largely fails to demonstrate why its IWMS framework is necessary or an efficient use of party and Commission resources, especially given the extensive, ongoing refinements made to the RDF.” FD; p. 362 – “A common point of contention among intervenors in this proceeding concerns SCE’s use of SRAs to define the scope of its proposed TUG program. As argued by TURN, Cal Advocates, MGRA, and SBUA, SCE’s IWMS framework uses qualitative criteria to categorize the consequences of different risks, and consequently fails to consider the likelihood of ignition when assessing whether to use undergrounding in its wildfire-mitigation efforts.1354 1354 TURN OB at 184-194; Cal Advocates OB at 8-18; MGRA OB at 9-14; SBUA OB at 18.” “Further, these parties and EPUC observe that SCE’s decision tree concerning when to deploy undergrounding hinges on whether a circuit is in a SRA, giving no consideration to the cost-effectiveness or risk spend efficiency	Verified Verified Verified

	(RSE)1355 of undergrounding as compared to alternative wildfire mitigations.1356 1356 TURN OB at 186-187; Cal Advocates OB at 8-9; MGRA OB at 13-14; Ex. SBUA-01 at 18; EPUC OB at 10-14." p. 363 – "…in failing to consider, analyze, and select the most cost-effective wildfire grid hardening mitigation available, SCE's current mitigation-selection process effectively sets a zero risk-tolerance policy without any thresholds for affordability.1359 1359 Ex. TURN-12 at 5-11; Ex. CA-30 at 1-20; Ex. MGRA-01 at 15-22; Ex. SBUA-01 at 22-25; Ex. EPUC-01 at 24-33.	Verified However, this citation is also on page 362 of D.25-09-030.
4. MGRA and other intervenors noted that egress, PSPS and other factors included in SCE's IWMS model as presented in its RAMP should instead be incorporated into its MARS risk model. Egress and PSPS risk were in fact included in the MARS model presented by SCE in its GRC. **Type: Contributor** **Topic: IWMS, Rsk**	FD; p. 375 – "SCE already incorporates both egress risk and PSPS risk into its wildfire risk modeling and risk scores, two of the key criteria SCE uses to define SRAs." RAMP-SPD-Rpt; p. 23 - "MGRA points out that by introducing the concept of "T1-Severe Risk Areas", "T2-High Consequence Areas" and "T3-Other HFRA" reporting tranches, SCE has decoupled its actual mitigation planning from its risk scores. 12" 12 MGRA Informal Comments to the SPD re: SCE's RAMP Filing, 10/10/2022, page 14. 13 MGRA Informal Comments to the SPD re: SCE's RAMP Filing, 10/10/2022, pages 14-15. p. 28 – "SPD agrees with MGRA and TURN that SCE did not include all risks in its RSE calculations. Therefore, SPD recommends that SCE include all risks, such as egress, past historical fires, and wind, in its MAVF and RSE risk analysis."	Verified Verified Verified
5. MGRA notes that rate increases are impacting low-income ratepayers to the extent where there may be measurable impacts to health. This is acknowledged by the Commission to be a "useful backdrop" to evaluating SCE's revenue requests.	FD; p. 30 – "MGRA asserts the rate increases required to implement massive wildfire mitigation programs may be approaching the level where they are impacting public health, especially for the poorest and most vulnerable.96 96 Ex. MGRA-01 at 99; MGRA OB at 17-20	Verified

It should be noted that MGRA did the analysis supporting its conclusion in a previous proceeding, and presented it in several other proceedings and in compensation claims. These contributions were not previously acknowledged or compensated. MGRA has persisted because it is our position that it is an important issue regardless of compensation potential. Nevertheless, with the acknowledgment offered by the Commission in the current proceeding, MGRA requests compensation on this issue for time spent in the current proceeding only and foregoes any claim to the previous work that established the basis for its position. **Type: Primary, Alternative** **Issue: Aff**	FD; p. 35 – "claims that SCE's rates are connected to homelessness, 107 and that utility rate increases are tied to reduced life expectancy,108 lack sufficient evidentiary support. Moreover, we recognize that affordability issues are also driven by factors such as wages not keeping pace with the costs of housing and other essential utility and non-utility expenses. However, given SCE's current and proposed rate levels, and considering our statutory obligations, we agree with intervenors that customer affordability is a critical factor to consider in this proceeding, and find the data and analysis presented by the parties to be a useful backdrop against which to evaluate SCE's individual GRC requests. 108 In testimony, MGRA acknowledges the evidence it presents in this proceeding concerning the potential health effects from SCE's rate increase on health and safety is not conclusory, and that it can be subject to a wide range of valid criticisms. (Ex. MGRA-01E at 99-100)."	Verified
6. MGRA obtained data from SCE allowing it to analyze SCE's risk buy-down over time and demonstrate that it had achieved significant risk reduction through the deployment of its covered conductor program and fast-curve settings. The Commission displays TURN's version of this data in the FD, which is appropriate since TURN additionally extrapolated the risk buy-down into future years, but the original data and plots can be found in the MGRA testimony and brief. MGRA's contribution was not acknowledged in the PD but	FD; p. 366 – "TURN argues SCE's proposed increase in undergrounding would be a poor use of ratepayer funds given the significant risk reduction that has already been achieved through covered conductor. The figure below shows SCE's estimated risk reduction due to grid hardening (i.e., covered conductor and undergrounding) and the implementation of fast curve settings.1369 1369 Ex. TURN-12-E, Figure 9 at 21; also, Ex. MGRA-01E at 57." GRC-MGRA-PD-Cmt; pp. 8-9 – "MGRA published a similar curve for historical data as Figure 4 of its Opening Brief 27 and Figure 12 of its testimony, which broke down SCE's risk buy-down curve into underground, covered conductor, and fast curve components. 28 27 MGRA Opening Brief; p. 43.	Verified Verified

was added to the FD in response to MGRA's PD Comments. **Type: Initiator** **Issue: Rsk**	28 MGRA-01-2E; p. 57. It should be emphasized that MGRA, TURN and Cal Advocates collaborated on technical and strategic matters and shared information, and it is entirely appropriate to use the TURN buydown curve due to its additional projections for the 2024-2028 period. However the citation should be modified to cite to the original source as well."	
7. MGRA analyzed all SCE advanced technologies throughout the RAMP and GRC proceedings and estimated their effectiveness in conjunction with covered conductor. MGRA recommended increases in funding for REFCL and for other SCE advanced technology programs, and the FD allows SCE an increase in REFCL funding if needed. Additionally, MGRA argued for REFCL risk reduction and RSE be included within the scope of the RAMP, and it was specifically included because of MGRA's intervention. That being said, the FD found MGRA's lack of commitment to specific funding targets for these programs unhelpful. While this has consequences, MGRA respectfully requests that the Commission consider the following when determining any disallowances: 1) MGRA was the sole party arguing for an increase in REFCL funding, which the Commission ultimately approved, and 2) An MGRA data request did provide information regarding the combination of covered	FD; p. 392-3 – "MGRA broadly recommends SCE "accelerate its evaluation and deployment" of REFCL projects and be provided "adequate funding to expand these programs." 1430 1430 Ex. MGRA-1 at 110; MGRA OB at 5." "It is generally accepted among the parties that covered conductor paired with REFCL technologies can provide significant risk reduction benefits. In light of these risk reduction benefits, and considering the reductions made to SCE's proposed TUG program, we authorize SCE to record in the Grid Hardening Balancing Account up to $20 million in capital expenditures for the installation of additional REFCL technologies above the amounts "approved in this decision. FD; p. 322 – "p. 322 - TURN points to the stand-alone risk reduction from fast curve settings,1225 which are expected to be deployed on a majority of SCE's HFRA circuits and may be combined with covered conductor; however, the record of this proceeding is unclear on the incremental risk reduction benefit of combining fast curve settings with covered conductor.1226 1226 During evidentiary hearing, SCE's witness testified that the incremental benefit of fast curve combined with covered conductor and REFCL is unknown (RT, Vol. 10 at 923:20-925:21; TURN OB at 170; SCE RB at 74). However, in an MGRA data request response, SCE estimates that fast curve setting provide an incremental ignition reduction of 1 percent over covered conductor plus	Verified Verified Verified

conductor and an advanced technology (fast curve) that was used in the FD. 3) MGRA's intervention during the RAMP was key to having REFCL risk reduction and RSE included in the RAMP scope. **Type: Contributing, Alternative** **Issue: AT**	REFCL. (Ex. MGRA-01E, Appendix B, Data Request Set MGRA-SCE-007)." FD p. 439; fn 1480 – "Including a scenario with covered conductor and advance technologies; a scenario where two-thirds of SCE's Severe Risk Areas are mitigated by covered conductor; a scenario with covered conductor and REFCL; and a scenario where all of SCE's HFRAs are hardened. MGRA's scenarios are designed to demonstrate the impact of changing system assumptions, and are not intended to be actual implementable proposals. (Ex. MGRA-01 at 81-98)." RAMP-MGRA-Scp-Bf; p. 3 – "MGRA requests that wildfire smoke health effects, power law model for catastrophic wildfire sizes, and Rapid Earth Fault Current Limiter (REFCL) be specifically listed for inclusion or protected from exclusion." p. 8 – "It is important to establish risk reduction and RSE for REFCL, particularly in combination with covered conductor, where it may provide protection approaching that of undergrounding." RAMP-Scp; pp. 2-3 – "Based on the application, PHC statements, discussion during the PHC, and briefs filed by several parties, the scope of issues to be addressed in this proceeding are as follows: … e. Whether risk reduction and risk-spend efficiency should be established for Rapid Earth Fault Current Limiter prototyping and developments in this RAMP and/or in its future RAMPs.	Verified However, this citation is on page 409 of D.25-09-030. Verified Verified Verified
8. MGRA continues to maintain that SCE's approach to the risk posed by high winds in its MARS risk model is inadequate, a view shared by SPD. MGRA noted that SCE's high wind SRA criterion used in its IWMS framework to some extent compensates for this flaw in the risk model, and therefore MGRA supported	FD; p. 379 – "while SCE did not sufficiently justify its full TUG proposal in this proceeding, undergrounding may be appropriate in high wind locations where covered conductor circuits would still be subject to high PSPS likelihood." GRC-MGRA-Brf; p. 71 – "Undergrounding should still be employed to address areas where particular attention is needed to risk reduction on either the probability side (such	Verified Verified

SCE's TUG program in extreme wind areas. This position is adopted by the FD. MGRA also pointed out that PSPS use in an area creates a bias in risk models which then underrepresent the risk in those areas, a position supported by SPD. **Type: Primary** **Issue: Wnd**	as high wind areas) or the consequence side (such as limited egress), or in specific cases where it is more efficient to implement than covered conductor and advanced technologies." RAMP-SPD-Rpt; p. 24 – "SPD agrees with MGRA that SCE's risk model fails to account for wind as an external risk driver and how it can increase outage rates. SCE's risk model fails to include conditional probabilities that correctly account for the increased likelihood of outages during the "extreme weather days" in the wildfire modeling.27 27 MGRA Informal Comments to SPD re: SCE's RAMP Filing, 10/10/2022, page 15. 28 MGRA Informal Comments to SPD re: SCE's RAMP Filing, 10/10/2022, pages 16-17. RAMP-SPD-Rpt; p. 40 – "as MGRA points out in their informal comments because SCE does not include PSPS damage events in its ignition risk model, this will bias the likelihood model (which is dependent on historical data), and result in underestimating the ignition risk in areas with frequent PSPS.58 SPD agrees with MGRA and recommends that SCE integrate PSPS damage and hazard reports into their likelihood calculations. 58 MGRA Informal Comments to SPD on SCE RAMP Report, 10/10/2022, page 26"	Verified However, this citation is on page 29 of D.25-09-030. Verified
9. MGRA raised a number of issues regarding SCE's risk analysis in the RAMP proceeding that were shared by SPD and included within the RAMP scope due to MGRA's support, including the importance of tail risk, catastrophic losses, and power laws, and also the health effects of wildfire smoke. **Type: Primary** **Issue: Rsk**	RAMP-SPD-Rpt; p. 22 – "1. SCE should revise its risk modeling to:… c. Improve modeling of catastrophic losses and the impacts of longer-lasting fires. d. Better reflect consequences of increased outage rates and "extreme weather" periods (i.e. adding a red flag warning day variable to better reflect the weighting of wind-driven drivers). e. Include estimates of health and safety consequences of wildfire smoke. FD-RAMP; pp. 8-9 – "MGRA states that SCE's risk modeling contains several deficiencies such as the lack of wind	Verified

	dependency in ignition models, not capturing extreme weather impacts, the limitations to the Technosylva consequence modeling, and the correlation between ignition and consequence. MGRA also recommends Technosylva is a wildfire science company that specializes in solutions for wildfire protection planning, risk analysis, simulation modeling, and operational response…. using power laws to model catastrophic events and including the impacts of wildfire smoke PSPS in SCE's risk modeling."	Verified However, this citation does not follow the phrasing from D.25-09-030 as MGRA inserts a footnote midsentence.

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

	INTERVENOR'S ASSERTION	CPUC DISCUSSION
a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: TURN, SBUA		Noted
d. Intervenor's claim of non-duplication: MGRA's contribution is distinctive in the emphasis it puts on utility wildfire risk reduction and the importance of achieving this goal in a cost effective way. While other intervenors' positions are similar to MGRA's in some cases, there are differences. MGRA brings with it directional vision for utility fire safety. For example TURN's primary goal has been ratepayer protection, while SBUA's emphasis is on protecting the interest of small business utility customers. These lead to a difference in emphasis between MGRA's positions and those of the other intervenors. Some duplication was inevitable, and in fact facilitated by cooperation and sharing of information between MGRA, TURN, and Cal Advocates. This cooperation in the long run reduced the overall amount of time and effort spent by intervenors.		Noted

C. Additional Comments on Part II:

<table>
<tr><th>#</th><th>INTERVENOR’S COMMENT</th><th>CPUC DISCUSSION</th></tr>
<tr><td>1</td><td>
<table>
<tr><td>Contribution Types</td><td>There are various types and levels of contribution that the Alliance interventions provided. These are defined and explained below.</td></tr>
<tr><td>Primary</td><td>A Primary contribution is one in which the Alliance made a unique and definitive difference in supplying information not supplied by any other party. The Alliance can show that "but for" its intervention, the Decision would have likely reached a different conclusion.</td></tr>
<tr><td>Initiator</td><td>In instances where the Alliance was an "Initiator", it was the first to bring a particular issue or analysis to the Commission's attention. Other parties subsequently made additions or improvements that were accepted by the Commission.</td></tr>
<tr><td>Contributor</td><td>While not initiating an analysis or study, the Alliance made a significant contribution to it. Also, in decisions or conclusions which take into account many different factors, the Alliance's results contribute one or more of these factors.</td></tr>
<tr><td>Improvement</td><td>The Alliance commented on an existing process or measure and its suggestion was adopted in the final decision.</td></tr>
<tr><td>Complimentary</td><td>The Alliance chose a different method or analysis than that used in the Final Decision, but which is consistent with it and supports the same results.</td></tr>
<tr><td>Alternative</td><td>The Alliance reached a conclusion or presented an analysis at variance with the Decision but which raised important points.</td></tr>
</table>
</td><td>Noted</td></tr>
<tr><td>2</td><td>Abbreviations for issues that MGRA was involved in:

GPr: General/Procedural
Procedural issues, preambles, establishing record, scope, process. Review and meeting times were distributed according to the issue weighting for the specific phase to which the reviews contributed.

Rsk: Risk
Issues related to risk, costs, RSEs, MAVF, likelihood, consequences, wildfire smoke and power laws.

Wnd: Wind-Related Risks</td><td>Noted</td></tr>
</table>

#	INTERVENOR’S COMMENT	CPUC DISCUSSION
	Issues relating wind-related risk. Extreme events, high wind events, ignition-rate biases due to PSPS. **IWMS: IWMS** Issues related to SCE’s “IWMS” consequence-only risk framework and the risk tolerance policy supporting it. **Hdn: Hardening** Issues related to Covered Conductor and Undergrounding as wildfire mitigations. **Aff: Affordability** Issues related to affordability and risks to low income ratepayers due to rate increases. **AT: Advanced Technologies** Issues related to the effectiveness, development and deployment of advanced wildfire mitigation technologies such as REFCL, Fast Trip PSPS, EFD, Hi-Z, DOPD.	
3	**Abbreviations for documents** FD — D.25-09-030 DECISION ON TEST YEAR 2025 GENERAL RATE CASE FOR SOUTHERN CALIFORNIA EDISON COMPANY (9/23/2025) FD-RAMP — D.23-11-007 DECISION CLOSING RISK ASSESSMENT MITIGATION PHASE (11/2/2023) **A.23-05-013** GRC-MGRA-PD-Rpl — MUSSEY GRADE ROAD ALLIANCE REPLY TO COMMENTS ON THE PROPOSED DECISION OF ADMINISTRATIVE LAW JUDGES RIZZO AND SEYBERT FOR THE 2025 TEST YEAR GENERAL RATE CASE OF SOUTHERN CALIFORINA EDISON COMPANY (August 25, 2025) GRC-MGRA-PD-Cmt — MUSSEY GRADE ROAD ALLIANCE COMMENTS ON THE PROPOSED DECISION OF ADMINISTRATIVE LAW JUDGES RIZZO AND SEYBERT FOR THE 2024 TEST YEAR GENERAL RATE CASE OF SOUTHERN CALIFORINA EDISON COMPANY (August 18, 2025) GRC-MGRA-RpBf — MUSSEY GRADE ROAD ALLIANCE REPLY BRIEF SOUTHERN CALIFORNIA EDISON’S 2025 GENERAL RATE CASE (August 5, 2024)	Noted

#	INTERVENOR'S COMMENT		CPUC DISCUSSION
	GRC-SCE-42	JOINT COMPARISON EXHIBIT (August 5, 2024)	
	GRC-MGRA-Bf	MUSSEY GRADE ROAD ALLIANCE OPENING BRIEF ON SOUTHERN CALIFORNIA EDISON'S 2025 GENERAL RATE CASE (July 15, 2024)	
	GRC-MGRA-01-2A	DIRECT TESTIMONY OF THE MUSSEY GRADE ROAD ALLIANCE SOUTHERN CALIFORNIA EDISON COMPANY 2025 GENERAL RATE CASE ERRATA 2A - CLEAN (February 29, 2024, Updated May 13, 2024, July 13, 2024)	
	GRC-MGRA-Prt	MUSSEY GRADE ROAD ALLIANCE PROTEST TO SOUTHERN CALIFORNIA EDISON COMPANY 2025 GENERAL RATE CASE APPLICATION (June 14, 2023)	
	A.22-05-013		
	RAMP-MGRA-Rpl	MUSSEY GRADE ROAD ALLIANCE REPLY TO COMMENTS ON SOUTHERN CALIFORNIA EDISON COMPANY'S RAMP FILING AND THE SAFETY POLICY DIVISION REPORT (January 4, 2023)	
	RAMP-MGRA-Cmt	MUSSEY GRADE ROAD ALLIANCE COMMENTS ON SOUTHERN CALIFORNIA EDISON COMPANY'S RAMP FILING AND THE SAFETY POLICY DIVISION REPORT (December 9, 2022)	
	RAMP-SPD-Rpt	Safety Policy Division Staff Evaluation Report on the Southern California Edison Company's 2022 Risk Assessment and Mitigation Phase (RAMP) Application (A.)22-05-013 (November 10, 2022)	
	RAMP-MGRA-InfCmt	MUSSEY GRADE ROAD ALLIANCE INFORMAL COMMENTS TO THE SAFETY POLICY DIVISION REGARDING SOUTHERN CALIFORINA EDISON COMPANY'S RAMP FILING (October 10, 2022)	
	RAMP-Scp	ASSIGNED COMMISSIONER'S SCOPING MEMO AND RULING (September 19, 2022)	
	RAMP-MGRA-ScBf	MUSSEY GRADE ROAD ALLIANCE BRIEF REGARDING SOUTHERN CALIFORNIA EDISON COMPANY 2022 RISK ASSESSMENT AND MITIGATION PHASE REPORT SCOPING (August 22, 2022)	
	RAMP-MGRA-Rsp	MUSSEY GRADE ROAD ALLIANCE RESPONSE TO SOUTHERN CALIFORNIA EDISON COMPANY 2022 RISK ASSESSMENT AND MITIGATION PHASE REPORT (June 13, 2022)	

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC DISCUSSION
a. Intervenor's claim of cost reasonableness: Over the past two decades, utility-caused wildfires have resulted in scores of deaths and damages over $30 billion. The primary goal of the Mussey Grade Road Alliance in its interventions since 2007 has been to identify utility wildfire risks and to identify cost-effective strategies to prevent them. In the context of wildfire risk, any strategy that reduces risk and does so at a reasonable cost provides a tremendous benefit to ratepayers. MGRA's expert, Joseph W. Mitchell, has been providing technical analysis of utility data and has published academic works on this subject, and has made numerous contributions to fire safety that have been recognized by the Commission. MGRA contributions were limited to areas in which we could provide unique, quantitative contributions. Dr. Mitchell's requested compensation rate reflects his 33 years of work as a Level V Physicist and his 18 years of work on Commission proceedings. While it is hard to accurately quantify the extent to which MGRA's contribution will decrease future risk and costs, even an incremental contribution, when multiplied by the avoided losses, vastly exceeds the compensation being requested by the Alliance. MGRA's technical input contributed substantially to the Commission's determination to substantially scale back SCE's requested undergrounding program, reducing their request from the original 685 miles to 212 miles and replacing it with covered conductor, at a savings of approximately $2 million per mile, or a total savings of $800 million. While it is not possible to estimate with certainty how much MGRA's contributions weighed into the Commission's Decision, even if the fraction were less than 10% this would still be equivalent of many millions of dollars, which far exceeds MGRA's compensation claim. MGRA's inputs during the RAMP phase also contributed to changes in the SDG&E risk analysis that improved safety and will lead to further safety improvements by allowing a more accurate assessment of geographical risk distribution. Given the potential for extreme losses, even a marginal improvement in safety provides substantial benefit. For 2025, MGRA requests an escalation of Dr. Mitchell's hourly rate of 3.46% based on the Hourly Rate Chart of 2/13/2025. This would increase Dr. Mitchell's rate for 2025 to $471.	After the adjustments made to this claim the remainder of the claimed costs are reasonable. *See* Part III.D.
b. Reasonableness of hours claimed:	After the adjustments made

	CPUC DISCUSSION
MGRA was careful to limit its participation to areas in which its expert could make a unique and substantive contribution, and to procedural areas of vital interest to the success of the proceeding. In the case of the present phase of the proceeding, MGRA only engaged in a few topics, and thus presents a very modest compensation request. Dr. Mitchell has been intervening on fire safety issues before the Commission since 2007. He participated in the previous GRC and RAMP proceedings of PG&E, SDG&E, and SCE. He was therefore well-prepared for this proceeding and was able to efficiently identify and concentrate on key issues that needed attention.	to this claim the remainder of the claimed hours Are reasonable. *See* Part III.D.
c. Allocation of hours by issue: 2022: GPr: 11.6 Rsk: 38.0 IWMS: 2.3 Wnd: 8.7 Hdn: 8.1 Aff: 0.8 AT: 2.6 2023: GPr: 3.0 Rsk: 4.9 IWMS: 5.5 Wnd: 4.9 Hdn: 2.5 Aff: 3.2 AT: 2.5 2024: GPr: 14.3 Rsk: 32.2 IWMS: 43.2 Wnd: 26.1 Hdn: 58.2 Aff: 11.4 AT: 28.6 2025: GPr: 0.5 Rsk: 1.9 IWMS: 3.6 Wnd: 4.3 Hdn: 6.8 Aff: 0.1 AT: 1.9	Noted

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate $	Basis for Rate*	Total $	Hours	Rate $	Total $
Dr. Joseph Mitchell (Expert)	2022	71.9	$395.00	D.23-08-039	$28,412.00 [6]	69.3 [2]	$395.00 [1]	$27,373.50
Dr. Joseph Mitchell (Expert)	2023	26.5	$415.00	D.25-05-022	$10,998.00 [7]	24.4 [2, 3]	$415.00 [1]	$10,126.00
Dr. Joseph Mitchell (Expert)	2024	214.2	$455.00	D.25-05-022	$97,479.00 [8]	210 [2]	$455.00 [1]	$95,550.00

[6] Mitchell's 2022 total should be $28,400.50 (71.90 x $395.00 = $28,400.50).

[7] Mitchell's 2023 total should be $10,997.50 (26.50 x $415.00 = $10,997.50).

[8] Mitchell's 2024 total should be $97,461.00 (214.20 x $455.00 = $97,461.00).

CLAIMED						CPUC AWARD		
Dr. Joseph Mitchell (Expert)	2025	19.1	$471.00	D.25-05-022 Hourly Rate Chart 2/13/25	$8,996.00 [9]	19.1	$470.00 [1]	$8,977.00
					Subtotal: $145,885[10]			***Subtotal: $142,026.50***
OTHER FEES **Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):**								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Dr. Joseph Mitchell (Expert)[11]	2025	8	$235.50	D.25-05-022 Hourly Rate Chart 2/13/25	$1,884.00	8	$235.00 [1]	$1,880.00
					Subtotal: $1,884.00			***Subtotal: $1,880.00***
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Dr. Joseph Mitchell (Expert)	2022	1	198.00	D.23-08-039	$198.00	1	$197.50 [1]	$197.50
Dr. Joseph Mitchell (Expert)	2023	1	208.00	D.25-05-022	$208.00	1	$207.50 [1]	$207.50
Dr. Joseph Mitchell (Expert)	2025	19.5	236.00	D.25-05-022 Hourly Rate Chart 2/13/25	$4,592.00[12]	12 [4]	$235.00 [1]	$2,820.00
					Subtotal: $4,990[13]			***Subtotal: $3,225.00***
COSTS								
#	**Item**	**Detail**			**Amount**			**Amount**
1.	AK Airlines	GRC Oral Argument flight			$1196.60			$350.00 [5]
2.	SF Taxi	Airport to SF Taxi			$69.12			$69.12
3.	SF Uber	SF to Airport			$42.30			$42.30
					Subtotal: $1,308[14]			***Subtotal: $461.42***
					TOTAL REQUEST: $154,013[15]			***TOTAL***
*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. Intervenor's records should identify specific								

[9] Mitchell's 2025 total should be $8,996.10 (19.1 x $471.00 = $8,996.10).

[10] MGRA's Attorney, Expert, and Advocate Fees should be $145,855.10 ($28,400.50 + $10,997.50 + $97,461.00 + $8,996.10 = $145,855.10).

[11] The Commission added a line for Other Fees for Mitchell.

[12] Mitchell's Intervenor Compensation Claim Preparation total should be $4,602.00 (19.50 x $236 = $4,602.00).

[13] MGRA's Intervenor Compensation Claim Preparation subtotal should be $5,008.00 ($198.00 + $208.00 + $4,602.00 = $5,008.00).

[14] MGRA's total costs should be $1,308.02.

[15] MGRA's total request should be $154,055.12 ($145,855.10 + $1,884.00 + $5008.00 + $1,308.02 = $154,055.12).

CLAIMED	CPUC AWARD
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	

C. Attachments Documenting Specific Claim and Comments on Part III:[16]

ATTACHMENT OR COMMENT #	DESCRIPTION/COMMENT
1	Certificate of Service
2	Mitchell timesheet
3	Mitchell GRC Testimony
4	Receipts

D. CPUC Comments, Disallowances, and Adjustments

ITEM	REASON
[1] Mitchell's 2022, 2023, 2024 and 2025 Hourly Rates and 2022, 2023, and 2025 Intervenor Compensation Claim Preparation Hourly Rates	Upon further review, the Commission has determined that Mitchell is a consultant. Pursuant to Commission policy, the rate requested by an intervenor must not exceed the rate billed to that intervenor by any outside consultant it hires, even if the consultant's billed rate is below the floor for a given experience level.[17] 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.[18] MGRA has confirmed that it paid Mitchell \$395.00 per hour in 2022, \$415.00 per hour in 2023, \$455.00 per hour in 2024, and \$471.00 per hour in 2025 for work in this proceeding. We find these rates reasonable given Mitchell's experience; however, we round Mitchell's 2025 rate to \$470.00 in order to round to the nearest five-dollar increment, and approve the other rates as requested. We apply one-half of Mitchell's 2022, 2023, and 2025 rates to adopt travel time and Intervenor Compensation Claim Preparation hourly rates of \$197.50, \$207.50, and \$235.00, respectively.

[16] Attachments are not included in the final decision.

[17] D.07-01-009, D.08-04-010, and Resolution ALJ-235.

[18] §1804(d).

ITEM	REASON
	The award determined herein for Mitchell's contribution in this proceeding shall be paid in full to Mitchell, and no portion of this part of the award shall be kept by MGRA. 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.
[2] Adjustment to Timesheet Entries	MGRA requested 71.90 hours in 2022 and 214.20 hours in 2024. However, MGRA's submitted timesheets show Mitchell worked 69.30 hours in 2022 and 210.00 hours in 2024. The Commission only compensates intervenors for *actual* time worked while substantially contributing to a Commission decision or order. We find it reasonable to award MGRA for the actual time Mitchell worked in A.22-05-013 and A.23-05-010, and make the following reductions: • 2022: 71.90 hours reduced to 69.30 hours • 2024: 214.20 hours reduced to 210.00 hours
[3] 2023 Disallowance for Vagueness	We find that MGRA has multiple vague or undefined time entries, totaling approximately 2.10 hours in 2023. Rule 17.4 requires that each time entry clearly identify the specific task performed. We suspect that some of these entries may be tasks within a larger task and could be related. However, MGRA should provide clearer descriptions so that Commission staff are not left to make assumptions. The entries listed below lack the necessary detail to determine their relevance or value to the proceeding, and do not comply with program requirements. Accordingly, we reduce 2.10 hours from Mitchell's 2023 work. We further note that the following activities do not clearly demonstrate how they contributed to the Commission's decision-making process. • November 9, 2023 – Activity: "Review", Description: "SCEGRC25 – Errata" • November 27, 2023 – Activity: "Review", Description: "SCEGRC25 – Review" • November 30, 2023 – Activity: "Review", Description: "SCEGRC25 – Review": Intervenors bear the burden of proof to show that all claimed hours were spent efficiently and made a substantial contribution, as required under program guidelines.
[4] Intervenor Compensation Claim Preparation	MGRA claimed 19.50 hours for preparation of the intervenor compensation request in their submitted timesheet. While the claim was generally compliant with Commission requirements, we find the preparation hours excessive given the scope of issues and overall scale of the request. Mitchell has significant experience practicing before the Commission and preparing

ITEM	REASON
Time Reduction	similar claims, and we expect greater efficiency in compiling this request. Accordingly, we reduce the claimed hours by 7.50 hours by awarding 12.00 hours for claim preparation. This adjustment better reflects the complexity and scale of the request.
[5] Cost Reductions	The Intervenor Compensation Program only provides compensation for reasonable costs incurred by intervenors as a result of their substantial contribution to CPUC proceedings in which they participated.[19] On July 14, 2025, ALJ Rizzo and ALJ Seybert issued a ruling setting oral arguments for August 11, 2025 in A.23-05-010. MGRA submitted receipts for $1,162.00 spent on a one-night first-class round-trip flight from San Diego to San Francisco for Mitchell on August, 6, 2025. We find it unreasonable for MGRA to take so long to book the flight and for it be first-class. After a review of similar flights booked in economy class, we find it reasonable to award MGRA $350.00 for Mitchell's flights to participate at the oral arguments.
[6] Consultant Disclaimer	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. 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. 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 obligation undermines the integrity of the compensation process and may lead to denial of claims or further enforcement action.

PART IV: OPPOSITIONS AND COMMENTS

[19] *See* §1802(a), (e) and Intervenor Compensation Program Guide at 4 and 23.

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. Mussey Grade Road Alliance has made a substantial contribution to D.23-11-007 and D.25-09-030.

2. The requested hourly rates for Mussey Grade Road Alliance 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.

3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.

4. The total of reasonable compensation is $147,592.92

CONCLUSION OF LAW

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

ORDER

1. Mussey Grade Road Alliance is awarded $147,592.92.

2. Within 30 days of the effective date of this decision, Southern California Edison Company shall pay Mussey Grade Road Alliance 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 December 29, 2025, the 75th day after the filing of Mussey Grade Road Alliance'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 16, 2026, at San Francisco, California.

JOHN REYNOLDS
President
DARCIE L. HOUCK
KAREN DOUGLAS
CHRISTINE HARADA
Commissioners

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

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D2607056	**Modifies Decision?**	No
Contribution Decision(s):	D2311007, D2509030		
Proceeding(s):	A2205013, A2305010		
Author:	ALJ Rafael Lirag, ALJ Colin Rizzo, ALJ Ehren Seybert		
Payer(s):	Southern California Edison Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Mussey Grade Road Alliance	10/15/25	$154,013[20]	$147,592.92	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
Joseph	Mitchell	Consultant	$395.00	2022	$395.00
Joseph	Mitchell	Consultant	$415.00	2023	$415.00
Joseph	Mitchell	Consultant	$455.00	2024	$455.00
Joseph	Mitchell	Consultant	$471.00	2025	$470.00

(END OF APPENDIX)

[20] MGRA's total request should be $154,055.12, as discussed in the footnotes of Part III.B.