ALJ/DBB/jds **PROPOSED DECISION** **Agenda ID #24408**
Ratesetting

Decision __________

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Reforms and Refinements, and Establish Forward Resource Adequacy Procurement Obligations.	R.23-10-011 (Filed Oct. 12, 2023)

DECISION GRANTING COMPENSATION TO CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE FOR SUBSTANTIAL CONTRIBUTION TO DECISION 24-06-004, D.24-12-003, AND D.25-06-048

Intervenor: California Environmental Justice Alliance	**For contribution to Decision (D.) 24-06-004, D.24-12-003, and D.25-06-048**
Claimed: $120,208.50[12]	**Awarded:** $121,903.50
Assigned Commissioner: John Reynolds[1]	**Assigned ALJ:** Debbie Chiv

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.24-06-004 adopted Local Capacity Requirements for 2025-2027, Flexibility Capacity Requirements for 2025, and refinements to the Resource Adequacy program. D.24-12-003 adopted modifications to the central procurement entity ("CPE") framework, such as eliminating the non-compensated self-show option of the CPE framework and locking in CPE allocations to load-serving entities one year earlier. D.25-06-048 adopted Local Capacity Requirements for 2026-2028, Flexible Capacity Requirements for 2026, and refinements to the Resource Adequacy ("RA") program.

[1] Commissioner John Reynolds was assigned to this proceeding on April 9, 2026.

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812[2]:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	Nov. 21, 2023	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	Dec. 6, 2023** ** CEJA filed additional information in response the ALJ's Ruling on the NOI on May 10, 2024.	Verified
4. Was the NOI timely filed?		Yes
Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	A.22-05-015, et. al.	Verified; CEJA timely filed an NOI in proceeding A.22.05-015 and was subsequently found eligible for intervenor compensation.
6. Date of ALJ ruling:	Feb. 23, 2023	Verified; Although the ruling on CEJA's eligibility was filed on June 29, 2026, it was issued on February 23, 2023.
7. Based on another CPUC determination (specify):	*See* D.25-04-015 (relying on the ALJ decision in A.22-05-015 to find CEJA meets the requirements of eligible customer status).	Noted

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

	Intervenor	CPUC Verification
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
Showing of "significant financial hardship" (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	A.22-05-015, et. al.	Verified; CEJA timely filed an NOI in proceeding A.22.05-015 and was subsequently found eligible for intervenor compensation.
10. Date of ALJ ruling:	Feb. 23, 2023	Verified; Although the ruling on CEJA's eligibility was filed on June 29, 2026, it was issued on February 23, 2023.
11. Based on another CPUC determination (specify):	*See* D.25-04-015 (relying on the ALJ decision in A.22-05-015 to find CEJA meets the requirements for financial hardship).	Verified
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.25-06-048	Verified
14. Date of issuance of Final Order or Decision:	June 27, 2025	Verified
15. File date of compensation request:	July 29, 2025	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
	The California Environmental Justice Alliance ("CEJA") is an alliance of nonprofit, public interest, and grassroots environmental justice	Noted

#	Intervenor's Comment(s)	CPUC Discussion
	organizations working to achieve environmental justice for low-income communities and communities of color throughout the state of California. CEJA's member organizations represent utility customers throughout California that are concerned about their health and the environment. In particular, CEJA is advocating for policies at the federal, state, regional, and local levels that protect public health and the environment. CEJA is also working to ensure that California enacts statewide climate change policies that protect low-income communities and communities of color.	

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
Issue A: Slice of Day Program Implementation – In Track 1, CEJA urged the Commission to not delay the Slice-of-Day program, but rather to continue to refine it as necessary after the test year. In the Track 1 Decision, the Commission agreed to not delay the Slice-of-Day program, and it also agreed that "minor adjustments" to the rules may be necessary after the test year.	D.24-06-004, pp. 14-15 (discussing CEJA's position). D.24-06-004, p. 16 ("In considering the parties' concerns about moving forward with 2025 implementation, the Commission is not persuaded that delaying implementation of the SOD framework is warranted…However, as we stated in D.23-04-010, we 'anticipate that minor adjustments to the compliance tools and program rules may be necessary following the test year.") D.24-06-024[3], p. 17 ("The Commission expects that the first year of	Verified

[3] D.24-06-004 is the correct decision number.

	implementation of an entirely new RA framework will be imperfect and that there will be hurdles, just as could be expected for any major regulatory program rollout. The Commission will continue to monitor the readiness of the SOD showing tools throughout 2024 and monitor LSEs' compliance with the SOD requirements in 2025 and will consider adjustments to the program as needed."). CEJA March 22, 2024 Track 1 Reply Comments, pp. 7-8. CEJA June 6, 2024 PD Comments, pp. 2-3 (discussing need to continue to consider adjustments to the SOD program). ** CEJA also drafted informal comments on the Master Resource Database to ensure that disadvantaged community information was included. In response to CEJA's comments, disadvantaged community information was included.	
Issue B: Resource Counting: Track 1 Considerations *Energy Storage Counting* – CEJA urged the Commission to approve CESA's proposal to not derate hybrid and co-located resources, and to count the renewable component QC the same as other storage resources' QC. The Commission agreed with the proposal to not derate the QC of hybrid and co-located resources. *Exceedance Levels* – CEJA	D.24-06-004, p. 42 (discussing CEJA's position related to energy storage counting). D.24-06-004, p. 43 ("Accordingly, under the SOD framework, hybrid and co-located resources' QC counting methodology will be as follows: the renewable component's QC value will be calculated the same as other renewable resources' QC values, the storage component's QC value will be calculated the same as other storage resources' QC values, and the total QC value of the resource will be the sum of the two components limited by the POI limit and the compliance tool's state-of-charge test.")	Verified

urged the Commission to set exceedance levels on a monthly rather than an annual basis. The Commission agreed that monthly exceedance levels should be adopted. *Charging Sufficiency*: CEJA urged the Commission to allow energy only resources to help fulfill charging sufficiency requirements. The Commission agreed that energy only resources should be allowed to meet charging sufficiency requirements.	CEJA March 22, 2024 Track 1 Reply Comments, p. 3. ----- D.24-06-004, p.43 (discussing CEJA's support for proposal to transition to monthly exceedances). D.24-06-004, p. 44 ("The Commission agrees that adjusting exceedance levels for wind and solar resources to a monthly level from the current seasonal level would improve accuracy in exceedance levels and would not be burdensome on Commission Staff resources.") D.24-06-004, FOF 7, p. 81. CEJA March 22, 2024 Track 1 Reply Comments, p. 8. ---- D.24-06-004, p. 48 (discussing CEJA's position related to energy only charging sufficiency). D.24-06-004, p. 48 ("The Commission agrees …to allow both EO resources to provide charging sufficiency of paired storage resources in hybrid and co-located configurations.") D.24-06-004, FOF 8, p. 81. D.24-06-004, COLs 6-8, p. 83. CEJA March 22, 2024 Track 1 Reply Comments, p. 4.	
Issue B: Resource Counting – Track 3 Considerations	D.25-06-048, p. 53 (discussing CEJA's support for examination of probabilistic	Verified

Exceedance Methodology – CEJA urged the Commission to take another look at the exceedance methodology due to concerns about undercounting wind and solar resources. The Commission agreed to authorize the Energy Division to include this issue and a workshop on this issue in the successor RA proceeding. *Demand Response Hours*- CEJA supported consideration of allowing demand response resources to serve hours outside of AAHs. The Commission agreed that there was merit in this proposal and agreed to examine it further. *Hourly Trading* – CEJA generally supported the hourly trading proposal but recommended further development. The Commission decided that further development of the hourly trading proposal was necessary to fully evaluate it.	accounting methodologies for solar and wind energy). D.25-06-048, p. 55 ("Energy Division is authorized to include this topic in its analysis for submission into the successor RA proceeding. The Commission also authorizes Energy Division to hold a workshop in Fall 2025 on the QC accreditation for wind and solar resources and the QC methodology for CAISO showings."). D.25-06-048, p. 80 (discussing CEJA's support for proposal to allow DR resources to serve hours outside of the AAHs) D.25-06-048, p. 80 ("While the Commission sees merit in the proposal, there are several questions that need to be addressed before further consideration."). D.25-06-048, p. 83 (discussing how CEJA supported the proposal for hourly trading in concept but recommended that there is further development related to guardrails). D.25-06-048, p. 86 ("The Commission agrees with parties that state that the proposal fails to fully address critical issues…") D.25-06-048, pp. 86-87 (requiring an assessment of the need, benefits and feasibility of an hourly load obligation trading mechanism). D.25-06-048, p. 120, FOF 10. CEJA March 3, 2025 Track 3 Opening Comments, pp. 8-9, 10-12.	

	CEJA June 11, 2025 PD Comments, pp. 5-6.	
Issue C: Central Procurement Entity: Simplifying CPE Showing Requirement – CEJA urged the Commission to simplify the CPE showing requirement to ensure that all local resources are counted. In the Track 2 Decision, the Commission agreed with CEJA's concern that the CPEs do not have access to information about what resources are under contract and what the true needs are in local areas. The Commission also agreed with CEJA's concern about potential over-procurement due to this lack of information. The Commission agreed to a simplified showing proposal that CEJA supported to provide a more reliable way for the CPE to obtain information.	D.24-12-003, p. 34 ("CEJA/Sierra Club support PG&E's proposal with the modification that the information reported to Energy Division should be aggregated by type of resource and be made public, as this would be important for determining what procurement gaps exist for phasing out reliance on gas plants. CEJA/Sierra Club support SCE's proposal as important to ensuring all local resources are counted towards phasing out reliance on gas plants."). D.24-12-003, pp. 37-38 ("the Commission is concerned that the CPEs do not have access to critical information before initiating the CPE solicitation as to what local resources are under contract by LSEs, what the most effective local resources are to secure, and what the true needs are in designated local areas. Without this information, the CPEs cannot make effective procurement decisions and may under- or over-procure in local capacity areas, which increases costs to ratepayers and in the case of under-procurement, may result in backstop procurement."). D.24-12-003, p. 38 ("The Commission is persuaded that PG&E's proposal may provide a much more reliable, efficient way for the CPEs to obtain information about what local resources are under contract by LSEs, along with their expiration date."). D.24-12-003, p. 74, FOFs 2-4. D.24-12-003, p. 75, COL 4. D.24-12-003, p. 76-77, OP 3.	Verified

	CEJA/SC August 9, 2024 Comments on Track 2 Proposals, pp. 18-19.	
Issue C: Central Procurement Entity: Recognition of the need to achieve GHG reduction goals at the least cost – CEJA raised concerns about the value of the CPE and how well the CPE was procuring energy to transition away from gas plants. The Commission found that CEJA's concerns should be further explored in the context of the programmatic approach to procurement.	D.24-12-003, p. 45 ("CEJA/Sierra Club state that based on Energy Division's CPE Report, it is unclear that the CPE has provided any benefit over LSEs conducting their own procurement and the CPE has not generated the competitive conditions needed to reduce prices and meet local RA requirements. CEJA/Sierra Club recommend refocusing the CPE to only procure new clean resources in local areas to plan for the retirement of gas plants.") D.24-12-003, pp. 47-48 (The Commission finds that the issues raised by CEJA/Sierra Club's proposal – aligning procurement targets, incentive design, and locational targets – warrant further exploration in a coordinated effort between the IRP and RA proceedings. As the Commission creates a pathway for a programmatic approach for long-term procurement, it is essential that procurement ensures reliability and achieves greenhouse gas reduction goals at least cost. We encourage CEJA/Sierra Club to provide input and recommendations in those efforts, including in response to the upcoming Commission staff proposal on the RCPPP, which is expected to be released in the IRP proceeding in Q4 of 2024."). CEJA June 14, 2024 Track 2 Proposals, pp. 2-8. CEJA August 9, 2024 Track 2 Comments, pp. 2-9. CEJA August 23, 2024 Track 2 Reply Comments, pp. 5-7.	Verified

Issue C: Central Procurement Entity - Expansion of CPE Reporting: CEJA urged the Commission to increase the transparency related to the CPE process and to expand the publication of additional CPE procurement information. Consistent with CEJA's arguments, the Commission agreed that expanding the publication of CPE information was reasonable and could benefit the stakeholders by providing more insight into the process.	D.24-12-003, p. 48 (discussion of CEJA's support of increased reporting). D.24-12-003, p. 48 (finding that the "expansion of the publication of CPE procurement information to be reasonable and agrees that providing additional granular information on the CPEs' procurement process could benefit the CPE framework by giving stakeholders more insight into the procurement process."). D.24-12-003, p. 75, FOF 7. D.24-12-003, p. 76, COL 6. D.24-12-003, p. 77-78, OP 4, 6 CEJA August 9, 2024 Track 2 Comments, pp. 18-19. CEJA/SC Nov. 18, 2024 PD Comments, p. 5.	Verified
Issue D: Reliability Requirements/Planning Reserve Margin – Track 2 - Additional Analysis Necessary – CEJA urged the Commission to delay setting the PRM due to concerns about the analysis that was conducted citing factual evidence that raised questions about the analysis. In the Track 2 Decision, the Commission agreed that additional vetting and further analysis of the PRM analysis was necessary.	D.24-12-003, p. 8 (discussing CEJA's opposition to the 23.5 and the 26.5 percent PRM). D.24-12-003, p. 9 ("CalCCA, Cal Advocates, CEJA/Sierra Club, and SCE express concern that calibrating LOLE by adding blocks of load may have material impacts in the SOD framework. Other parties, such as CEJA/Sierra Club, PCF, and Microsoft, express concern with artificially limiting the available imports in the translation, which appears to have artificially increased the PRM.") (citations omitted). D.24-12-003, p. 11 ("The Commission agrees that additional vetting and further	Verified

	analysis of the issues raised by parties is needed.”). D.24-12-003, p. 74, FOF 1. D.24-12-003, p. 75, COLs 1-2. D.24-12-003, p. 76, OP 1. CEJA August 23, 2024 Track 2 Reply Comments, pp. 3-4 (discussing need to evaluate affordability in PRM decision). CEJA September 9, 2024 Comments on Appendix A to LOLE Study. CEJA Nov. 25, 2024 PD Reply Comments, pp. 2-3.	
Issue D: Reliability Requirements/Planning Reserve Margin for 2026 and 2027 – CEJA urged the Commission to adopt a 17% PRM for 2026 and 2027 and to continue suing an effective PRM for summer months. CEJA also argued that a lower PRM did not violate AB 2368 or D.24-12-003. The Commission agreed with CEJA’s arguments for a lower PRM and adopted an 18% PRM and authorized the continued use of an effective PRM. Consistent with CEJA’s position, the Commission also agreed that a lower PRM did not violate AB 2368 or D.24-12-003.	D.25-06-048, pp. 22-23 (discussing CEJA’s support for Proposal A to adopt a 17% PRM). D.25-06-048, p. 22 (discussing how CEJA supports a lower PRM because it “best addresses affordability concerns by avoiding unnecessary procurement….”). D.25-06-048, pp. 25-26 (“CEJA disagrees that Proposal A contradicts AB 2368 or D.24-12-003 arguing that Energy Division used the 0.1 LOLE standard to come up with a reliability metric that best balances reliability and affordability issues.”). D.25-06-048, p. 26 (discussing CEJA’s assertions related to the calculation of LOLE). D.25-06-048, p. 38 (adopting an 18% PRM). D.25-06-048, p. 39 (“the Commisison disagrees that the PRM adopted in this	Verified

	decision is inconsistent with AB 2368.”). D.25-06-048, p. 41 (determining that the 18% PRM reasonably “balanced ratepayer costs, as mandated by Pub. Util. Code Section 380”). D.25-06-048, p. 108 (discussing CEJA’s comments in support of the 18% PRM in the proposed decision). D.25-06-048, p. 110 (“We agree with CEJA that AB 2368 also adds an objective to the RA program: “Consideration of mitigation measures, if the commission determines they are needed, to reduce costs to ratepayers.”) D.25-06-048, p. 110 (“We disagree that the effective PRM framework presents reliability concerns, and agree with CEJA that parties have provided no instance where the effective PRM (that has been in place since 2024) resulted in reliability issues.”) D.25-06-048, p. 119, FOFs 4-6. D.25-06-048, p. 121, COL 4. CEJA March 3, 2025 Track 3 Opening Comments, pp. 3-7. CEJA March 17, 2025 Track 3 Reply Comments, pp. 2-10. CEJA June 11, 2025 PD Comments, pp. 2-3. CEJA June 16, 2025 PD Reply Comments, pp. 1-5. *See also* CEJA April 2, 2024 Comments on Inputs and Assumptions, pp. 4-5	

	(discussing the need to consider affordability with relation to reliability).	

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: The Sierra Club was the primary intervenor taking positions similar to CEJA. Given the similarity of positions, CEJA worked with Sierra Club on the majority of filings in Track 1 and Track 2 of this proceeding.		Noted
d. Intervenor's claim of non-duplication: Throughout Track 1 and Track 2 of the proceeding, CEJA and Sierra Club ("CEJA/Sierra Club") extensively coordinated their efforts to avoid duplication. CEJA and Sierra Club drafted and filed joint comments on all matters when their positions were aligned, which was for nearly every set of formal and informal comments in the proceeding. CEJA and Sierra Club communicated to coordinate strategy, share resources, and complete filings in the proceeding. Collaborating significantly minimized time spent drafting, researching, and analyzing issues. The coordinated efforts of CEJA and Sierra Club also avoided the potential for duplication. CEJA focused many of its comments on issues that impact disadvantaged community within this proceeding because CEJA was one of the main parties focused primarily on these issues, and CEJA was the only active party directly representing environmental justice communities. CEJA's comments provided analysis, research and data that highlighted their own arguments from the perspectives of an alliance of environmental justice organizations and an environmental protection organization.		Noted

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: CEJA has participated in all major aspects of this time-intensive, complicated proceeding, including filing multiple comments related to the issues described above. CEJA's filings reflected detailed substantive analysis. CEJA took the lead on drafting most filings in this proceeding. Details related to how CEJA and Sierra Club split responsibilities are detailed in CEJA's timesheet for Ms. Behles, who led in this proceeding. When CEJA took the lead, it analyzed the materials, presented a detailed outline, and drafted the comments. Sierra Club helped provide feedback as well as additional resources to support core positions. When Sierra Club took the lead, CEJA provided feedback on the outline of issues, and CEJA read through initial party comments to provide feedback on the scope of reply comments. CEJA also provided feedback on the initial drafts of comments. The comments CEJA submitted in this proceeding included significant legal, policy, and technical research on the many topics raised by the Commission's rulings, workshops, and decision. CEJA's extensive participation and detailed filings ensured the Commission had sufficient information to make a determination based on the record. Importantly, the Commission was tasked with making determinations of requirements related to reliability and planning requirements, both of which are of great concern to the communities CEJA represents. The majority of the work that CEJA performed in the proceeding was focused on how the proposed actions would impact these communities. Many of the collaboration hours were spent discussing the importance of aspects of the proposals with other parties in the proceeding to develop alignment on these issues that are critical to the communities CEJA represents. CEJA spent significant time writing detailed comments to ensure that the Commission and the Energy Division staff had the information needed to make informed decisions. Developing these detailed comments required significant research and an analysis of technical information and filings by dozens of parties. CEJA's request for fees and costs is likely to be a very small portion of the benefits that utility customers are likely to ultimately realize due to the improvements in planning and procurement. In particular, here, CEJA spent the majority of its advocacy time focusing on the affordability of a	Noted

	CPUC Discussion
lower planning reserve margin. By adopting a lower planning reserve margin, the RA decision, due to CEJA's advocacy, will likely save ratepayers millions of dollars.	
b. Reasonableness of hours claimed: As mentioned above, CEJA participated in all major aspects of the proceeding, including filing multiple comments, participating in ex parte meetings, and coordinating with multiple parties. CEJA's total filings are reflected in many pages of detailed substantive analysis. CEJA often had to analyze dozens and dozens of filings to develop comments and critiques of other parties. The amount of time CEJA spent on this portion of the proceeding is reasonable considering CEJA's extensive participation in and contribution to a wide range of outcomes. Furthermore, CEJA's hours are likely very low considering the number of filings, meetings, wide range of issues, and parties in this proceeding. CEJA's submitted significant legal, policy, and technical research on the topics raised by the Commission's ultimate decision. CEJA often took the lead on drafting many of the issues covered in joint comments. As one of the only parties directly representing disadvantaged communities, CEJA took the lead on all issues that directly impacted the communities we represent. CEJA was conscious of limiting hours and time spent on the proceeding. Deborah Behles, an experienced attorney and CPUC practitioner, took on the lead role in the proceeding. She coordinated with co-counsel, Shana Lazerow, to assure that internal duplication was avoided. Shana Lazerow also analyzed filings and issues to help develop positions in the proceeding and as an employee of one of CEJA's members, Ms. Lazerow was instrumental in ensuring that positions represented the goals of the alliance's members. Working together, Ms. Behles and Ms. Lazerow avoided duplication. When Ms. Behles was not lead, Ms. Lazerow, who is also an experienced attorney and CPUC practitioner, assumed the role of lead attorney. Ms. Behles' and Ms. Lazerow's extensive CPUC experience and leadership reduced the number of hours required to develop briefs and comments for their own work. CEJA is not requesting hours that its attorneys found to be duplicative or excessive, and they performed a thorough and detailed review of hours to ensure there is no unnecessary duplication or excessiveness. For example, CEJA removed all the hours discussing the issue internally with CEJA's	Noted

	CPUC Discussion
Energy Equity Committee and committee members. CEJA also removed all hours related to discussions with CEJA members related to the proceeding and its decision.	
c. Allocation of hours by issue: CEJA has allocated all its attorney and expert time by issue area or activity, as evident by the attached timesheets. The following issues allocate hours by specific substantive issues and activity areas addressed by CEJA. CEJA also provides an approximate breakdown of the number of hours spent on each task and the percentage of total hours devoted to each category. Issue A: Slice of Day Implementation, 8.6% of hours Work on slice of day implementation issues includes researching legal and factual issues, drafting technical and legal comments, and responding to critiques raised by other parties. Issue B: Resource Counting Issues, 9.5% of hours Work on issues related to resource counting includes time spent researching legal and factual issues, discussions with other groups, analyzing modeling, drafting technical and legal comments, and responding to critiques raised by other parties. Issues C: Central Procurement Entity Issues, 28.3% of hours Work on issues related to Central Procurement Entity issues includes time spent researching legal and factual issues, discussions with other groups, research of the CPUC's findings and documents, drafting technical and legal comments, and responding to critiques raised by other parties. Issue D: Reliability Requirements/Planning Reserve Margin, 46.3% of hours Work on issues related to the reliability requirements and the planning reserve margin includes researching legal and factual issues, analyzing modeling, drafting technical and legal comments, and responding to critiques raised by other parties. Issue E: General Participation, 1.5 % of hours General participation work is work that is essential to participation in the proceeding that typically spans multiple issues and/or is necessary for participating in the proceeding. This includes reviewing the initial	Noted; totals 100%.

	CPUC Discussion
Commission rulings, initial review of proposals by Staff, meetings, and work coordinating with other parties on general issues. If discussions with other parties were focused on a particular issue, those hours are allocated under that issue. Issue F: Intervenor Compensation, 5.8 % of hours Work preparing this request for compensation and analyzing the initial Commission decision related to compensation. CEJA submits that given the broad and extensive nature of this proceeding, this information should suffice to address the allocation requirement under the Commission's rules. If the Commission wishes to see additional or different information at this point, CEJA requests that the Commission inform it and provide a reasonable opportunity to supplement this showing accordingly.	

B. Specific Claim:*

CLAIMED						**CPUC AWARD**		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Deborah Behles	2023	0.7	$645	D.24-05-062	$451.50	0.70	$645.00 [1,3]	$451.50
Deborah Behles	2024	96.3[4]	$670	D.25-04-015	$64,521.00	98.80	$670.00 [1,3]	$66,196.00
Deborah Behles	2025	57.3	$695	D.25-07-027	$39,823.50	57.30	$695.00 [1,3]	$39,823.50
Shana Lazerow	2024	8.5	$730	D.25-04-015	$6205.00	8.50	$730.00 [2,3]	$6,205.00
Shana Lazerow	2025	8.5	$755	D.25-07-027	$6,417.50	8.50	$755.00 [2,3]	$6,417.50
Subtotal: $117,418.50						***Subtotal:* $119,093.50**		

[4] 98.80 hours are the correct amount of hours for Behles, as recorded in the submitted timesheets.

Claimed						**CPUC Award**		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Deborah Behles	2024	0.7[5]	$645	½ of 2024 rate	$837.50[6]	0.00	$335.00 [1,3]	$0.00
Deborah Behles	2025	96.3[7]	$670	½ of 2025 rate	$2,415.00[8]	7.00	$347.50 [1,3]	$2,432.50
Shana Lazerow	2025	57.3[9]	$695	½ of 2025 rate	$375.00[10]	1.00	$377.50 [2,3]	$377.50
Subtotal: $2,790[11]						***Subtotal: $2,810.00***		
TOTAL REQUEST: $120,208.50[12]						***TOTAL AWARD: $121,903.50***		
*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 issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award. **Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate								

ATTORNEY INFORMATION			
Attorney	**Date Admitted to CA BAR[13]**	**Member Number**	**Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation**
Deborah Behles	December 2001	218281	No
Shana Lazerow	June 1998	195491	No

[5] No IComp preparation hours have been recorded for Behles, as shown in the submitted timesheet.

[6] The correct total requested is $451.50.

[7] 7.00 IComp preparation hours are the correct amount of hours for Behles, as recorded in the submitted timesheets.

[8] The correct total requested is $64,521.00.

[9] 1.00 IComp preparation hour is the correct amount of hours for Lazerow, as recorded in the submitted timesheets.

[10] The correct total requested is $39,823.50.

[11] The correct subtotal is $104,796.00.

[12] The correct total requested is $222,214.50.

[13] 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[14]:

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Timesheets
Attachment 3	Documentation of Contingency Arrangement with Behles and Lazerow
Comment 1	Deborah Behles has been practicing environmental law since 2001. Ms. Behles received a B.S. in civil engineering with an environmental and structural engineering emphasis from Purdue University and her J.D. from the University of Minnesota. She has served as a trial attorney for the U.S. Department of Justice in the Environmental Enforcement Section and as an associate professor and a staff attorney with the Environmental Law and Justice Clinic at Golden Gate University School of Law. Since 2016, Ms. Behles is a sole practitioner specializing in environmental law and policy. CEJA provided Deborah Behles' CV and the justification for Ms. Behles' hourly rate, pursuant to the directions in Res. ALJ-393 to CEJA's request filed in R.20-05-003 on July 15, 2021. Ms. Behles is an independent consultant working on a contingency basis. Ms. Behles' contract with CEJA to provide her services on a contingency basis was filed in Rulemaking 22-07-005. CEJA has included documentation of this agreement as Attachment 3 to this filing. Since Ms. Behles works solely on contingency, CEJA is requesting market rate for her work. Ms. Behles' 2023 rate of $645 was approved by the Commission in D.24-05-062. Ms. Behles' 2024 rate of $670 was approved in D.25-04-015. Ms. Behles' 2025 rate of $695 was approved in D.25-07-027.
Comment 2	Shana Lazerow is Legal Co-Director at Communities for a Better Environment. She graduated from law school at the University of California, Los Angeles in 1997. She has practiced environmental and administrative law for more than 20 years, and she has held the position of Chief of Litigation / Legal Director at CBE since 2005. CEJA provided Shana Lazerow's CV and the justification for the requested hourly rates for Ms. Lazerow, pursuant to the directions in Res. ALJ-393 in CEJA's request filed in R.20-05-003 on July 15, 2021. Ms. Lazerow represents CEJA on a contingency basis. A discussion of Ms. Lazerow's representation on a contingency basis was filed in Rulemaking

[14] Attachments not included in final Decision.

Attachment or Comment #	Description/Comment
	22-07-005. CEJA has included further information about this contingency agreement as Attachment 3 to this filing. Since Ms. Lazerow works solely on contingency, CEJA is requesting market rate for her work. Ms. Lazerow's 2024 rate of $730 was approved in D.25-04-015. Ms. Lazerow's 2025 rate of $755 was approved in D.25-07-027.

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Behles' 2023, 2024, and 2025 Hourly Rate	CEJA has confirmed that Behles 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.[15] 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). CEJA has confirmed that per the terms of their contract, Behles has been hired on a contingency rate basis, meaning that Behles has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on Behles' experience as an Attorney V. Given that the 2023 rate range for Attorney V is $534.32 to $747.04, the 2024 rate range is $560.95 to $773.67, and the 2025 rate range is $584.51 to $797.23, we find the requested 2023 hourly rate of $645.00, 2024 hourly rate of $670.00, and 2025 hourly rate of $695.00 to be reasonable and we adopt it here. The award determined herein for Behles' contribution in this proceeding shall be paid in full to Behles, and no portion of this part of the award shall be kept by CEJA. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission's policy on consultant compensation, and the understanding that the consultant has not billed or collected compensation for the work performed until the final award is given.
[2] Lazerow's 2024 and 2025 Hourly Rate	CEJA has confirmed that Lazerow 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.[15] Per the IComp

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

Item	Reason
	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). CEJA has confirmed that per the terms of their contract, Lazerow has been hired on a contingency rate basis, meaning that Lazerow has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on Lazerow's experience as an Attorney V. Given that the 2024 rate range for Attorney V is \$560.95 to \$773.67 and the 2025 rate range is \$584.51 to \$797.23, we find the requested 2024 hourly rate of \$730.00 and 2025 hourly rate of \$755.00 to be reasonable and we adopt it here. The award determined herein for Lazerow's contribution in this proceeding shall be paid in full to Lazerow, and no portion of this part of the award shall be kept by CEJA. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission's policy on consultant compensation, and the understanding that the consultant has not billed or collected compensation for the work performed until the final award is given.
[3] Intervenor Responsibility for Transparency and Accuracy in Compensation Requests	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

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. California Environmental Justice Alliance has made a substantial contribution to D.24-06-004, D.24-12-003, and D.25-06-048.

2. The requested hourly rates for CEJA's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services, and/or reflect the actual rates billed to, and paid by the intervenor, for consultant services rendered.

3. The total of reasonable compensation is $121,903.50.

CONCLUSION OF LAW

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

ORDER

1. California Environmental Justice Alliance is awarded $121,903.50.

2. Within 30 days of the effective date of this decision, the California Public Utilities Commission shall pay California Environmental Justice 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 October 12, 2025, the 75th day after the filing of California Environmental Justice 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 August __, 2026, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	[INSERT NEW DECISION #]	**Modifies Decision?**	No
Contribution Decision(s):	D2406004, D2412003, and D2506048		
Proceeding(s):	R2310011		
Author:	Judge Chiv		
Payer(s):	California Public Utilities Commission		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
California Environmental Justice Alliance	July 29, 2025	$120,208.50[12]	$121,903.50	N/A	N/A

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Deborah	Behles[16]	Attorney	$645	2023	$645.00
Deborah	Behles[16]	Attorney	$670	2024	$670.00
Deborah	Behles[16]	Attorney	$695	2025	$695.00
Shana	Lazerow[17]	Attorney	$730	2024	$730.00
Shana	Lazerow[17]	Attorney	$755	2025	$755.00

(END OF APPENDIX)

[16] Behles serves CEJA as a consultant.

[17] Lazerow serves CEJA as a consultant.