

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Proceeding to
Consider Rules to Implement the
Broadband Equity, Access, and Deployment
Program.

Rulemaking 23-02-016
(Filed February 23, 2023)

**DECISION GRANTING COMPENSATION TO CENTER FOR
ACCESSIBLE TECHNOLOGY FOR SUBSTANTIAL CONTRIBUTIONS
TO DECISION (D.) 25-02-029, D.25-07-040, AND RESOLUTION T-17898**

Intervenor: Center for Accessible Technology	For contribution to Decision D.25-02-029, D.25-07-040, D.25-10-022, Resolution T-17898
Claimed: \$22,895.25	Awarded: \$18,343.50
Assigned Commissioner: Darcie L. Houck ¹	Assigned ALJ: Thomas J. Glegola ²

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	Decision (D.) 25-02-029 made minor changes to D.24-09-050 and denied USTelecom's Application for Rehearing. D.25-07-040 modified D.24-05-029 and D.24-09-050 to conform to the National Telecommunications and Information Administration's (NTIA) June 6, 2025 BEAD Policy Restructuring Notice. D.25-10-022 Awarded CforAT partial compensation for its substantial contribution to D.25-07-040 and D.24-09-050. Resolution T-17898 approved Communications Division Staff (Staff)'s request to submit the Broadband Equity, Access, and Deployment (BEAD) Final Proposal to NTIA.
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¹ Commissioner Houck was assigned to Rulemaking (R.) 23-02-016 on February 28, 2023.

² Administrative Law Judge (ALJ) Glegola was assigned to R.23-02-016 on February 28, 2023.

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812³:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	May 31, 2023	Verified
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	June 8, 2023	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:	D.25-10-022	Verified
6. Date of ALJ ruling:	Oct. 9, 2025	October 13, 2025
7. Based on another CPUC determination (specify):	See comment below.	D.25-10-022 found CforAT eligible to receive intervenor compensation, so CforAT remains eligible pursuant to Rule 17.2.
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.25-10-022	Verified
10. Date of ALJ ruling:	Oct. 9, 2025	October 13, 2025
11. Based on another CPUC determination (specify):	See comment below.	D.25-10-022 found CforAT eligible to receive intervenor compensation, so CforAT remains eligible pursuant to Rule 17.2.
12. Has the Intervenor demonstrated significant financial hardship?		Yes

³ 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.25-02-029 D.25-07-040 D.25-10-022 Resolution T-17898	Verified
14. Date of issuance of Final Order or Decision:	February 21, 2025 August 4, 2025 October 9, 2025 December 19, 2025	Verified with the exception that D.25-10-022 was issued on October 13, 2025.
15. File date of compensation request:	2/17/2026	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
	Rule 17.2 of the Commission's Rules of Practice and Procedure states that "A party found eligible in one phase of a proceeding remains eligible in other phases, including any rehearing, in the same proceeding." CforAT was first awarded compensation in this proceeding in D.25-10-022, which also confirmed CforAT's eligibility.	D.25-10-022 found CforAT eligible to receive intervenor compensation, so CforAT remains eligible pursuant to Rule 17.2.

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
Background: The Commission opened this proceeding to consider rules to determine grant funding, eligibility and compliance for		Noted

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
funds distributed to California under the federal Broadband Equity, Access, and Deployment Program (BEAD Program). The BEAD program is administered by the National Telecommunications and Information Association (NTIA), which required that states applying for BEAD grant funding draft a proposal detailing how they would determine eligibility for, and award funding to, subgrantees. In D.24-05-029 and D.24-08-050, the Commission approved California's BEAD grant proposal (the Commission has previously awarded compensation to CforAT related our substantial contributions to those decisions, and CforAT is not requesting additional compensation for our work leading to either of those decisions here). On October 31, 2024, USTelecom filed an application for rehearing of D.24-09-025. The Commission denied that Application on February 20, 2025 in D.25-02-029. On June 6, 2025, NTIA issued a Restructuring Policy Notice, which substantially revised the funding requirements for the BEAD Program. In response to that notice, the Commission		

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
modified its proposal on July 24, 2025 in D.25-07-040. On December 2, 2025, the Commission issued Draft Resolution T-17898, which approved Communications Division's request for approval to submit California's BEAD Final Proposal to the NTIA. The Commission approved the resolution on December 19, 2025. In conjunction with the various Decisions addressed in this compensation request, CforAT has provided input on multiple issues including low-income programs and revised federal requirements. CforAT filed the following documents addressing those issues: CforAT and TURN Joint Response to Application for Rehearing of USTelecom (Nov. 15, 2024) (Joint Response to AFR); CforAT Reply Comments on ALJ's June 16, 2025 Ruling (June 24, 2025) (Reply Comments on ALJ Ruling); CforAT Comments on Proposed Decision Granting Compensation (Oct. 9, 2025) (Comments on Compensation PD).		

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
Comments on Resolution T-17898 (December 9, 2025) (Comments on Resolution).		
Application for Rehearing USTelecom's Application for Rehearing (filed October 31, 2024), raised various claims of legal error in D.24-09-040. These claims focused on D.24-09-040's requirements related to low-cost programs. CforAT, in conjunction with TURN, argued that D.24-09-040's requirement that BEAD subgrantees participate in low-cost service and middle-class affordability plans was not legal error. Joint Response to AFR at pp. 2-8. CforAT noted that the portions of USTelecom's Application regarding LifeLine applied only to the "rate modification" element of the BEAD Proposal's low-cost requirements. Joint Response to AFR at pp. 2-3. CforAT argued that applicants were not required to request an increase in the rate cap, and that an applicant had to commit to participating in LifeLine only if it wanted the ability to request a rate modification. Joint Response to AFR at pp. 3-4.	Consistent with the argument made by CforAT, the Decision held that USTelecom showed no legal error in the requirement that BEAD subgrantees participate in those programs. D.24-09-040 at pp. 3-8. "USTelecom's claim that the Decision makes 'federal lifeline or state equivalent participation...a precondition of receiving BEAD funding' is incorrect. Rather, participation in these programs is a precondition of receiving a rate modification for a low-cost program." D.24-09-040 at p. 4 (citations omitted). "If a subgrantee wishes not to participate in Lifeline or California LifeLine (or is ineligible to do so), nothing in the Decision requires it to do so to participate in the BEAD program. (Ibid.) A subgrantee may simply choose not to seek a modification to the low-cost program rate of \$30 per month." D.24-09-040 at p. 4 (citations omitted).	We note that D.24-09-040 was not a decision in R.23-02-016. Rather the decision on USTelecom's Application for Rehearing (AFR) was D.24-09-050. CforAT's citation to the decision on USTelecom's AFR should be D.25-02-029 and not D.24-09-050. With these modifications, we verify CforAT's claimed contributions.

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
CforAT argued that USTelecom had not shown legal error, because the Commission is not required to create identical requirements for different grant programs, especially considering that grant programs have different funding sources with different rules. Joint Response to AFR at pp. 7-8. CforAT argued that US Telecom had not shown legal error because the Commission's rules for the Federal Funding Account (FFA) and BEAT were not inconsistent. Joint Comments on AFH at p. 8. CforAT argued that US Telecom had not shown legal error because the BEAD requirements gave the Commission broad discretion to create low- and middle-income affordability programs. Joint Comments on AFH at p. 9.	“[T]here is no legal requirement for the Commission to perfectly align the two programs.” D.24-09-040 at p. 6. “[T]here is no conflict between the Commission's prior decision adopting the FFA rules and the Decision at issue here, and no legal error.” D.24-09-040 at p. 6. “USTelecom claims that the rate caps set by the Decision for the LowCost Plan and Middle-Class Affordability Plan (\$30/month and \$84/month, respectively) are legal error because they contravene the provisions of the IJA and federal BEAD policy, and are preempted. This, too, is incorrect.” D.24-09-040 at p. 10.	
BEAD Program Revisions: On June 6, 2025, NTIA issued a Restructuring Policy Notice (RPN), which substantially revised the funding requirements for the BEAD Program. In response to that notice, on June 17, 2025, the Commission issued a ruling requesting comments on what changes were necessary to California's BEAD Proposal to	As a threshold issue, the Commission requested party input and issued a PD in an unusually short period in order to conform with federal guidelines. The time between the June 17, 2025 ruling requesting input on modifications and the Commission's release of the Proposed Decision on July 10, 2025 was 23 days. Similarly, the Commission voted out the PD a mere 14 days after it issued the PD, and only 7 days after	We verify CforAT's claimed contributions to BEAD Program Revisions except for the final claim CforAT lists because CforAT did not provide a citation.

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
comply with the RPN. ALJ Ruling (June 17, 2025). That Ruling set the date for responses to be due one week later (June 24, 2025), and reply comments one week after opening comments (July 1, 2025). On July 10, 2025, the Commission issued a Proposed Decision addressing changes required by the RPN. The PD set the date for comments on July 17, 2025. The Commission voted out the Proposed Decision on July 24, 2025, in D.25-07-040. CforAT acknowledged the need for the Commission to act quickly in order to secure California's BEAD funding. Reply Comments on ALJ Ruling at p. 1. CforAT argued that the NTIA's 90-day deadline for "meeting the revised requirements is ... unreasonable, and indicates that the Department of Commerce is likely setting the	party comments on the PD. The 31-page PD spends ten pages discussing party comments and barely more than a page discussing the actual changes to California's Proposal. Given this extremely short time frame, the final Decision lacks the robust discussion of its consideration of party input that one would normally expect to see. However, D.25-07-040 (and Resolution T-17898, which includes discussion of staff's implementation of California's BEAD application process) do contain language sufficient to support a finding that the Commission relied on CforAT's input in the prior decision. For this reason, CforAT refers to both Commission actions as they demonstrate our substantial contribution. Moreover, while lacking substantive discussion, the D.25-07-040 specifically states that the Commission declines "to waive the comment period entirely, due to the high value we place on public comments." D.25-07-040 at p. 27. The decision found that "a reduced public review and comment period appropriately balances the need for regulatory efficiency with the goal of public notice and comment." D.25-07-040 at p. 27 (citation omitted).	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
BEAD program up to fail.” Opening Comments on ALJ Ruling at p. 7 (citations omitted); D.25-07-040 at p. 18-19. CforAT argued that the Commission should provide a meaningful review of existing and new BEAD funding applications. Comments on ALJ Ruling at p. 5.	“Commission Staff will provide notice to parties regarding the mechanics of the application process, including dates for the opening of the prequalification window and the application window. Commission Staff will provide all necessary information to potential applicants regarding how to submit new or modified applications in the “Benefit of the Bargain” round, the last and final application window for the BEAD program. Commission Staff will provide application materials to potential applicants, answer questions, and provide FAQs.” D.25-07-040 at p. 27. “Over the course of BEAD 2.0, from June 6, 2025 to October 2, 2025, Staff received 140 BEAD 2.0 related questions through BEAD outreach channels and provided official responses to ensure all interested parties have access to the same information. These questions and responses were then incorporated into the BEAD 2.0 Subgrantee Selection Process FAQ. A total of nine iterations of the BEAD 2.0 Subgrantee Selection Process FAQ was published on the CPUC BEAD website and stakeholders were notified through the BEAD Constant Contact email list.” Resolution T-17898 at p. 14. “Staff scored and analyzed the applications for compliance with NOFO and RPN requirements, reviewed local feedback, and conducted financial,	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
CforAT argued that the Commission should ensure that applicants bear the burden of demonstrating that their chosen technology will meet the minimum service requirements. Comments on ALJ Ruling at pp. 3-4; Reply Comments on ALJ Ruling at pp. 1-2. CforAT argued that the RPN's requirements would eliminate many of the consumer benefits that otherwise would have flowed to California consumers. Comments on ALJ Ruling at p. 3; Resolution T-17898 at p. 25. CforAT argued that "California's BEAD Program has been developed to advance state policy goals within the parameters of the BEAD	managerial, and technical evaluations of all applicants." Resolution T-17898 at p. 27. California's final plan was approved by the Commission in Resolution T-17898. That resolution includes links to application materials, including: • BEAD 2.0 Low-Earth Orbit (LEO) Evidence Submission Template and Instructions; • BEAD 2.0 Unlicensed Fixed Wireless (ULFW) Evidence Submission Template and Instructions; • BEAD 2.0 Licensed Fixed Wireless (LFW) Evidence Submission Template and Instructions; • BEAD 2.0 Hybrid Fiber-Coaxial (HFC) Evidence Submission Template and Instructions; and • BEAD 2.0 Fiber-to-the-Premises Evidence Submission Template and Instructions. Resolution T-17898 at pp. 15-16. Each of those templates requires that applicants provide detailed information about the planned technology, location, and capacity to be used in the project. In response to CforAT's comments, the Commission stated that "Staff acknowledges that the draft Resolution reflects the public interest considerations permissible under	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
statute, and the Commission should take all available steps to ensure that this continues to be the case.”	NTIA’s requirements.” Resolution T-17898 at p. 25.	
Intervenor Compensation: It is CforAT’s understanding that time spent on intervenor compensation issues are billed at 50 percent of an attorney or advocate’s rate. The 50% rate is reflected in the time records attached to this compensation request. On November 22, 2024, CforAT filed a Request for Compensation for \$125,187.25 for its work related to D.24-05-029 and D.24-09-050. On September 8, 2025, the Commission issued a proposed Decision awarding CforAT \$86,864.25. CforAT argued that the PD inconsistently and arbitrarily reduced CforAT’s hours for work on the Proposed Decision and the Five-Year Plan. Comments on Compensation PD at pp. 3-6. CforAT argued that the PD erred in denying CforAT	The Commission ultimately awarded CforAT \$109,008.75. D.25-10-022. While the Commission did not award CforAT compensation for all the time requested, “The Commission reviewed CforAT’s comments and finds it reasonable to award full compensation for CforAT’s work on its Comments on the Proposed Decision and Comments on the Five-Year Plan. We also find it reasonable to keep the reduction for CforAT’s work on the Challenge Process issue.” D.25-10-022 at p. 30. “The Commission reviewed CforAT’s comments and finds it reasonable to	CforAT was already compensated for its work in D.25-10-022. Intervenors also cannot receive Intervenor Compensation Claim Preparation hours for time spent on comments on Intervenor Compensation proposed decisions.⁴

⁴ See D.24-12-067 at 12.

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
compensation for work completed prior to the opening of the proceeding. Comments on Compensation PD at pp. 6-7. CforAT argued that the PD erred in improperly characterizing some of CforAT's work as administrative or clerical. Comments on Compensation PD at pp. 7-9.	reinstate the 0.90 hours CforAT spent before the proceeding opened." D.25-10-022 at p. 30. "The Commission reviewed CforAT's comments and finds that the 11 timesheet entries in question were not administrative or clerical. We therefore reinstate the 1.70 hours for Goodman's work in 2023." D.25-10-022 at p. 30.	
On November 9 and November 11, CforAT, by email, requested that the ALJ provide CforAT with the opportunity to submit comments on the Proposed Decision on CforAT's November 22, 2024 Intervenor Compensation Request.	D.25-10-022 notes that the period for comments on the PD was waived but that "CforAT filed a motion to comment on the Proposed Decision, which was granted." D.25-10-022 at p. 30.	We verify CforAT's request to comment on the Proposed Decision was granted.

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: #OaklandUndivided California Community Foundation Communications Workers of America, District 9 Communities in Schools of Los Angeles (CISLA) Electronic Frontier Foundation Healing and Justice Center National Diversity Coalition		Noted

	Intervenor's Assertion	CPUC Discussion
Next Century Cities Schools, Health and Libraries Broadband Coalition Small Business Utility Advocates The Greenlining Institute The Utility Reform Network United Parents and Students UNITE-LA Yurok Tribe		
d. Intervenor's claim of non-duplication: As was the case in prior phases of this proceeding as well as its predecessor (R.11-03-013), CforAT has maintained our practice of working regularly with other consumer groups, including preparation of joint filings when appropriate. CforAT regularly coordinated with #OaklandUndivided, California Community Foundation, Communications Workers of America, District 9, Communities in Schools of Los Angeles (CISLA), Healing and Justice Center, The Utility Reform Network (TURN), United Parents and Students, and UNITE-LA. Throughout this proceeding, in preparing joint filings, we implemented shared responsibilities, managed by conferring between the parties in order to work efficiently, and to avoid duplication. CforAT coordinated with some or all of the above-listed parties for most filings, whether or not we produced a joint document. When the organizations had different policy positions on specific issues, we still coordinated and addressed those issues where we agreed in collaborative fashion. CforAT is requesting a minimal number of hours for time spent on CforAT and TURN's Joint Response to Application for Rehearing of USTelecom. TURN was the lead author of that document and did the bulk of the drafting. However, CforAT did coordinate with TURN on issues to address and did provide revisions to the document. Accordingly, the minimal hours claimed by CforAT represent contributions to the document, rather a repetition of another party's arguments. As discussed above, in portions of this proceeding, the Commission set very tight deadlines for party input. Accordingly, parties' ability to avoid duplication was more difficult. Given the number of parties and the schedule in this proceeding, any duplication was minimal.		Noted

PART III: REASONABLENESS OF REQUESTED COMPENSATION**A. General Claim of Reasonableness (§ 1801 and § 1806):**

	CPUC Discussion
a. Intervenor’s claim of cost reasonableness: The importance of the issues under consideration in this proceeding is extremely high for customers, and even greater for customer groups with specific challenges surrounding their relationship with communications services like CforAT’s constituency of customers with disabilities and medical needs. For this reason, and to ensure that the needs of this unique constituency were addressed in all aspects of this proceeding, it is appropriate that CforAT expended substantial resources in participation, including active work in support of the decisions addressed in this request for compensation. While it is difficult to attribute a specific dollar value to any of CforAT’s contributions, the overall input of CforAT has been focused on ensuring that our constituency is not inappropriately burdened by a lack of access to communications services, that their needs are regularly given consideration, and that they are able to access communications services, including during emergency situations. In this context, the support provided by CforAT for the Commission’s efforts to ensure that customers benefit from the Commission’s BEAD requirements exceeds the amount of compensation we are requesting. Additionally, CforAT notes that it exercised reasonable billing judgment in preparing this claim, i.e., made the decision to exclude certain hours spent on work that was arguably compensable.	Noted
b. Reasonableness of hours claimed: As noted above, CforAT’s 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 communications services. CforAT’s work was led and primarily conducted by Legal Counsel Paul Goodman, who has substantial experience in addressing issues the availability, affordability, and accessibility, of communications services. As appropriate, Mr. Goodman delegated specific tasks, including drafting of specific issues in the context of various filings, to CforAT’s junior attorney, Rachel Sweetnam. While Mr. Goodman appropriately supervised and reviewed Ms. Sweetnam’s work, this type of delegation is appropriate	After the adjustments made to this claim the remainder of the claimed hours are reasonable. <i>See</i> Part III.D.

	CPUC Discussion
and efficient, particularly in light of the substantial differences in the hourly rates for Ms. Sweetnam and Mr. Goodman. Additionally, both Mr. Goodman and Ms. Sweetnam’s work was supervised by Melissa Kasnitz, CforAT’s Legal Director, who has greater expertise regarding the communications needs of people with disabilities and medical needs. Ms. Kasnitz’s supervision of Mr. Goodman and Ms. Sweetnam, including specific input on issues of concern to the disability community, was appropriate and efficient. These practices improved efficiency overall and were reasonable, particularly in the context where providers and industry representatives often had multiple representatives present to advance their concerns. 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.	
c. Allocation of hours by issue: Hours for Paul Goodman, Legal Counsel, in 2024 (3 hours total): App for Rehearing: 2 hours, 66.7 percent The issue area “App for Rehearing” includes time spent on responding to USTelecom’s application for Rehearing. Revised NOFO: 1 hour, 33.3 percent The issue area “Revised NOFO” includes time spent on NTIA’s revised Notice of Funding Opportunity and Restructuring Policy Notice. Hours for Paul Goodman, Legal Counsel, in 2025 (19 hours total): Revised NOFO: 16.5 hours, 86.8 percent Resolution: 2.5 hours, 13.2 percent The issue area “Resolution” includes time spent on Resolution T-17898.	Noted

	CPUC Discussion
Hours for Melissa Kasnitz, Legal Director, in 2025 (1.7 hours total): Revised NOFO: 1.1 hours, 64.7 percent Resolution: 0.6 hours, 35.3 percent Hours for Rachel Sweetnam, Staff Attorney, in 2025 (1.7 hours total): Resolution: 0.2 hours, 100 percent	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Paul Goodman	2024	3	\$ 625	D. 25-04-018	\$ 1,875.00	3.00	\$625.00	\$1,875.00
Paul Goodman	2025	19	\$ 680	Comment A	\$ 12,920.00	19.00	\$680.00 [1]	\$12,920.00
Melissa W. Kasnitz	2025	1.7	\$ 755	D.25-10-060	\$ 1,283.50	1.70	\$755.00	\$1,283.50
Rachel Sweetnam	2025	0.2	\$ 275	D.25-10-050	\$ 55.00	0.20	\$275.00 [2]	\$55.00
Subtotal: \$ 16,133.50						Subtotal: \$16,133.50		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Paul Goodman	2025	9	\$ 340	Comment B	\$ 3,060.00	0.00 [3]	\$340.00	\$0.00
Paul Goodman	2026	6.3 ⁵	\$ 340	Comment B	\$ 2,210.00	6.50	\$340.00	\$2,210.00

⁵ The correct total hours CforAT requested for Goodman's 2025 Intervenor Compensation Claim Preparation is 6.5 as reflected in the submitted timesheets and total dollars requested (6.5 x \$340 = \$2,210).

CLAIMED						CPUC AWARD		
Melissa Kasnitz	2025	0.2	\$ 377.50	D.25-10-060	\$ 75.50	0.00 [3]	N/A [3]	\$0.00
Rachel Sweetnam	2026	10.3	\$ 137.50	Comment B	\$ 1,416.25	0.00 [3]	N/A [3]	\$0.00
Subtotal: \$ 6,761.75						Subtotal: \$2,210.00		
TOTAL REQUEST: \$ 22,895.25						TOTAL AWARD: \$18,343.50		

*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. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate

ATTORNEY INFORMATION

Attorney	Date Admitted to CA BAR ⁶	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Melissa W. Kasnitz	1992	162679	No
Paul Goodman	2002	219086	No
Rachel Sweetnam	2023	350075	No

C. Attachments Documenting Specific Claim and Comments on Part III:⁷

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Time Records, including merits and time on compensation
3	Resolution T-17898
4	Letter from Paul Goodman, Legal Counsel, Center for Accessible Technology, to Communications Division re: Resolution T-17898 (Dec. 9, 2025)
A	Rate for Paul Goodman in 2025:

⁶ This information may be obtained through the State Bar of California's website at <https://apps.calbar.ca.gov/attorney/LicenseeSearch/QuickSearch>.

⁷ Attachments are not included in the final Decision.

Attachment or Comment #	Description/Comment
	On September 23, 2025, CforAT filed an intervenor compensation claim in A.19-11-003 that included a request that the Commission adopt an hourly rate of \$680 for CforAT's Legal Counsel, Paul Goodman, based on the Market Rate Study and guidance adopted in Resolution ALJ-393, issued on December 22, 2020. The Commission has not yet acted on that intervenor compensation claim. Rather than repeat the same showing here for the requested hourly rate for Mr. Goodman, CforAT refers the Commission to the showing presented in A.20-11-001.
B	Rates for Time Spent on Compensation Request: While this compensation request was drafted in 2026, all the recorded work on the merits took place in 2024 or earlier. For this reason, CforAT is requesting time spent on compensation at ½ the standard rates for 2025. We will request updated rates for 2026 rates in a later compensation request.

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Goodman's 2025 Hourly Rate and Intervenor Compensation Claim Preparation Hourly Rate	CforAT requested a 2025 hourly rate of \$680.00 for Goodman and cited its request for compensation in A.20-11-001 as its basis for the rate. There CforAT requested a 2025 hourly rate of \$680.00 for Goodman, which included a second, and final, step increase for the Legal – Attorney – Level V classification. D.25-04-018 approved a 2024 hourly rate of \$625.00 for Goodman. Per Resolution ALJ-393 we apply the 2025 escalation factor of 3.46% and the 5% step increase requested by CforAT to Goodman's 2024 hourly rate of \$625.00 to adopt a 2025 hourly rate of \$680.00 for Goodman after rounding to the nearest \$5 increment. We apply one-half of Goodman's 2025 hourly rate of \$680.00 for a 2025 Intervenor Compensation Claim Preparation rate of \$340.00 for all of Goodman claim preparation work in this claim per CforAT's request in Part III.C, Comment B.
[2] Sweetnam's 2025 Hourly Rate	CforAT cited D.25-10-050 as its basis for Sweetnam's 2025 hourly rate of \$275.00. However, that decision does not adopt an hourly rate for Sweetnam. D.25-10-060 adopted a 2025 hourly rate of \$275.00 for Sweetnam, which we apply here.
[3] Intervenor Compensation	CforAT was already compensated for its work in D.25-10-022. Intervenor also cannot receive Intervenor Compensation Claim Preparation hours for

Item	Reason
Claim Preparation Reduction	time spent on comments on Intervenor Compensation proposed decisions.⁸ We therefore find that CforAT is ineligible to receive further compensation for its work on D.25-10-022, which results in the following reductions: <u>2025 Intervenor Compensation Claim Preparation Reductions:</u> • Goodman: 9.00 hours • Kasnitz: 0.20 hours • Sweetnam: 10.30 hours <u>2025 Intervenor Compensation Claim Preparation Hourly Rates:</u> We find it reasonable not to adopt 2025 Intervenor Compensation Claim Preparation hourly rates for Kasnitz or Sweetnam because we do not award them any hours.

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 (<i>see</i> Rule 14.6(c)(6))?	Yes

FINDINGS OF FACT

1. Center for Accessible Technology has made a substantial contribution to D.25-02-029, D.25-07-040, and Resolution T-17898.
2. Center for Accessible Technology has not made a new substantial contribution to D.25-10-022.
3. The requested hourly rates for Center for Accessible Technology's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
4. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
5. The total of reasonable compensation is \$18,343.50.

⁸ See D.24-12-067 at 12.

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 \$18,343.50.
2. Within 30 days of the effective date of this decision, the California Public Utilities Commission shall pay Center for Accessible Technology 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 May 3, 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 _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D2502029, D2507040, and Resolution T-17898		
Proceeding(s):	R2302016		
Author:	ALJ Thomas Glegola		
Payer(s):	The California Public Utilities Commission		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Center for Accessible Technology	February 17, 2026	\$ 22,895.25	\$18,343.50	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
Paul	Goodman	Attorney	\$ 625	2024	\$625.00
Paul	Goodman	Attorney	\$ 680	2025	\$680.00
Melissa	Kasnitz	Attorney	\$ 755	2025	\$755.00
Rachel	Sweetnam	Attorney	\$ 275	2025	\$275.00

(END OF APPENDIX)