

Decision \_\_\_\_\_

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

Order Instituting Rulemaking to Investigate and Design  
Clean Energy Financing Options for Electricity and Natural  
Gas Customers.

Rulemaking 20-08-022  
(filed August 27, 2020)

**DECISION GRANTING COMPENSATION TO SMALL BUSINESS UTILITY  
ADVOCATES FOR SUBSTANTIAL CONTRIBUTION TO DECISION 25-12-021**

|                                                               |                                                    |
|---------------------------------------------------------------|----------------------------------------------------|
| <b>Intervenor:</b> Small Business Utility<br>Advocates (SBUA) | <b>For contribution to Decision (D.) 25-12-021</b> |
| <b>Claimed:</b> \$22,293.00                                   | <b>Awarded:</b> \$19,033.00                        |
| <b>Assigned Commissioner:</b> John Reynolds <sup>1</sup>      | <b>Assigned ALJ:</b> Garrett Toy                   |

**PART I: PROCEDURAL ISSUES**

|                                          |                                                                                                                                                                                                                                                                                                                      |
|------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>A. Brief description of Decision:</b> | D.25-12-021 authorizes Southern California Edison's proposed Tariff On-Bill Financing Pilot proposal, with modifications, and denies the proposals put forth by San Diego Gas & Electric Company, Southern California Gas Company, and Silicon Valley Clean Energy. In addition, the Decision closes the proceeding. |
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util.  
Code §§ 1801-1812<sup>2</sup>:**

|                                                                                   | <b>Intervenor</b> | <b>CPUC Verification</b> |
|-----------------------------------------------------------------------------------|-------------------|--------------------------|
| <b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b> |                   |                          |
| 1. Date of Prehearing Conference:                                                 | February 5, 2021  | Verified                 |
| 2. Other specified date for NOI:                                                  |                   |                          |

<sup>1</sup> R.20-08-022 has been reassigned to Commissioner John Reynolds from Commissioner Alice Reynolds as of June 30, 2026.

<sup>2</sup> All statutory references are to California Public Utilities Code unless indicated otherwise.

|                                                                                                                             | Intervenor                  | CPUC Verification |
|-----------------------------------------------------------------------------------------------------------------------------|-----------------------------|-------------------|
| 3. Date NOI filed:                                                                                                          | March 8, 2021               | Verified          |
| 4. Was the NOI timely filed?                                                                                                |                             | Yes               |
| <b>Showing of eligible customer status (§ 1802(b))<br/>or eligible local government entity status (§§ 1802(d), 1802.4):</b> |                             |                   |
| 5. Based on ALJ ruling issued in proceeding number:                                                                         | R.22-02-005, <i>et. al.</i> | R.20-08-020       |
| 6. Date of ALJ ruling:                                                                                                      | August 2, 2022              | December 23, 2020 |
| 7. Based on another CPUC determination (specify):                                                                           |                             |                   |
| 8. Has the Intervenor demonstrated customer status or eligible government entity status?                                    |                             | Yes               |
| <b>Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):</b>                                                |                             |                   |
| 9. Based on ALJ ruling issued in proceeding number:                                                                         | R.22-02-005, <i>et. al.</i> | R.20-08-020       |
| 10. Date of ALJ ruling:                                                                                                     | August 2, 2022              | December 23, 2020 |
| 11. Based on another CPUC determination (specify):                                                                          |                             |                   |
| 12. Has the Intervenor demonstrated significant financial hardship?                                                         |                             | Yes               |
| <b>Timely request for compensation (§ 1804(c)):</b>                                                                         |                             |                   |
| 13. Identify Final Decision:                                                                                                | D.25-12-021                 | Verified          |
| 14. Date of issuance of Final Order or Decision:                                                                            | December 23, 2025           | Verified          |
| 15. File date of compensation request:                                                                                      | February 10, 2026           | Verified          |
| 16. Was the request for compensation timely?                                                                                |                             | Yes               |

**C. Additional Comments on Part I:**

| #   | Intervenor’s Comment(s)                                                                                                                                                                                                                                                     | CPUC Discussion |
|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| B.3 | Rule 17.1(a) of the Commission’s Rules of Practice and Procedure requires the NOI to be filed within 30 days of the prehearing conference. Pursuant to Rule 1.15, if the last day falls on a Saturday, Sunday, holiday or other day when the Commission offices are closed, | Noted           |

| #      | Intervenor's Comment(s)                                                                                                                                                                                                                                                                     | CPUC Discussion |
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|        | the time limit is extended to include the next business day thereafter. Thirty days from the prehearing conference was Sunday, March 7, 2021, and SBUA filed its NOI on the next business day thereafter, which is Monday, March 8, 2021.                                                   |                 |
| B.9-10 | SBUA also received rulings on its customer status and showing of significant financial hardship in A.18-11-005 on June 24, 2019 and R.20-08-020 on December 23, 2020, occurring before and slightly after SBUA commenced activities in R.20-08-022. <i>See</i> Pub. Util. Code §1804(b)(1). | Noted           |

## PART II: SUBSTANTIAL CONTRIBUTION

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

| Intervenor's Claimed Contribution(s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Specific References to Intervenor's Claimed Contribution(s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | CPUC Discussion |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| <p><b><u>1. Tariff On-Bill (TOB) Proposals – Small Business Inclusion</u></b></p> <p>SBUA made a substantial contribution by developing the evidentiary and policy record concerning the exclusion of small business customers from Tariff On-Bill (TOB) financing pilots. No other party addressed this customer class in connection with the TOB proposals. While the Decision ultimately limited participation to residential customers, SBUA's participation enriched the record and ensured that small business ratepayer</p> | <p>The Decision includes a dedicated Section 6.5 that addresses SBUA's request: "SBUA asks that all TOB pilots be opened to include small business customers, as they face similar challenges to obtaining financing for clean energy upgrades that residential customers face. SBUA states that additional workshops could be utilized to discuss concerns and explore modifications to the pilot proposals." Decision, at 56.</p> <p>The Decision only adopted the SCE TOB proposal (with modifications) and limited participation to residential customers, stating that "SCE's TOB Pilot Proposal is open to all residential</p> | Verified        |

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| <p>concerns were squarely before the Commission.</p> <p>On April 16, 2025, the ALJ issued a Ruling requesting parties' comment on the May 16, 2024 Joint TOB Proposals and the Report of Dunskey Energy + Climate Advisors regarding the Tariff On-Bill Proposal (Dunskey Report). SBUA analyzed both the Joint TOB Proposal and the Dunskey Report and submitted comments addressing the exclusion of small businesses and advocating for the TOB pilots to be expanded to include these customers. Opening Comments of Small Business Utility Advocates to the April 16<sup>th</sup> Ruling Regarding Tariff On-Bill Financing Proposals, May 14, 2025 (SBUA Opening Comments on TOB Proposals); Reply Comments of Small Business Utility Advocates to the April 16<sup>th</sup> Ruling Regarding Tariff On-Bill Financing Proposals, May 30, 2025 (SBUA Reply Comments on TOB Proposals).</p> <p>SBUA noted that small business customers face financial and structural barriers to clean energy adoption comparable to those of residential customers yet remain excluded from the current TOB pilot proposals, ongoing discussion, and analysis. SBUA Opening Comments on TOB Proposals, at 1-2; SBUA Reply</p> | <p>customers living in an individually metered unit in good standing with SCE,” while declining to adopt SBUA’s recommended expansion to small business customers. <i>Id.</i>, at 77.</p> <p>The Decision also expressly addressed SBUA’s continued advocacy for small business customers in the comments on the Proposed Decision, “SBUA requested that businesses be allowed to participate in the pilot.” <i>Id.</i>, at 90-91. While the Commission noted that “[n]o changes have been made pursuant to these recommendations,” SBUA submits that it was reasonable to advocate for changes to the decision on behalf of small business ratepayers.</p> |  |
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| <p>Comments on TOB Proposals at 2. SBUA also noted that small business participation in the pilots is feasible by citing existing programs identified in the Dunskey Report and proposing practical paths forward, including expanding pilot eligibility or establishing workshops and phased inclusion. SBUA Opening Comments on TOB Proposals at 4; Opening Comments of Small Business Utility Advocates on the Proposed Decision, Nov. 20, 2025, at 2-3.</p> <p>In addition, SBUA held an ex parte meeting with Syche Cai, Energy Advisor to President Reynolds on December 8, 2025 to discuss the Proposed Decision and advocate for the inclusion of small business customers in the TOB pilots. Small Business Utility Advocates' Three-Day Advance Ex Parte Notice, Dec. 3, 2025.</p> <p>SBUA submits that the foregoing advocacy was warranted and valuable even though its positions were not adopted. The standard for an award of intervenor compensation is whether SBUA made a substantial contribution to the Commission's decision, not whether SBUA prevailed on any particular recommendation. <i>See, e.g.</i>, D.08-04-004 at 5-6 (the Commission "may benefit</p> |  |  |
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| <p>from an intervenor's participation even where the Commission did not adopt any of the intervenor's positions or recommendations"); D.09-04-027 at 4 (intervenor made substantial contributions where its efforts "contributed to the inclusion of these issues in the Commission's deliberation"). Here, the residential-only limitation was a utility design choice embedded in the TOB Proposals, not a statutory or regulatory mandate that restricted TOB eligibility to residential customers.</p> |  |  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|

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

|                                                                                                                          | <b>Intervenor's Assertion</b> | <b>CPUC Discussion</b>                                                                                                                                                                            |
|--------------------------------------------------------------------------------------------------------------------------|-------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?</b> | Yes                           | Verified                                                                                                                                                                                          |
| <b>b. Were there other parties to the proceeding with positions similar to yours?</b>                                    | No                            | Noted; While TURN, CforAT and NCLC participated in this proceeding and filed for intervenor compensation, none addressed the issue of expanding the TOB pilot proposals to include small business |

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|                                                                                                                                                                                                                                                                                                                                                                                                                                   |  | customers as did SBUA.                                                                                                                                                                                                   |
| <b>c. If so, provide name of other parties:</b>                                                                                                                                                                                                                                                                                                                                                                                   |  | N/A                                                                                                                                                                                                                      |
| <p><b>d. Intervenor's claim of non-duplication:</b> SBUA provided the perspective of small business ratepayers and participated to advocate for the inclusion of these ratepayers in the TOB proposals. SBUA's participation was distinct from other parties that focused on matters related to residential customers.</p> <p>SBUA was the only advocate focusing exclusively on the interests of small commercial customers.</p> |  | Noted; While TURN, CforAT and NCLC participated in this proceeding and filed for intervenor compensation, none addressed the issue of expanding the TOB pilot proposals to include small business customers as did SBUA. |

### PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | CPUC Discussion |
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| <p><b>a. Intervenor's claim of cost reasonableness:</b> Given the importance of the Clean Energy Financing proceeding for non-residential customers, especially small commercial customers, it was reasonable for SBUA to dedicate continued resources on this case to represent and advocate on behalf of small business ratepayers in this last phase. SBUA actively participated in this docket by analyzing, researching and drafting comments on the IOU TOB proposals, submitting comments on the Proposed Decision and participating in an ex parte meeting.</p> <p>This phase of the docket focused exclusively on the TOB proposals of the investor-owned utilities (and ultimately only approved one modified proposal by Southern California Edison (SCE). Despite not adopting SBUA's recommendation for the inclusion of small business customers, the Commission should find SBUA substantially contributed to this phase of the proceeding by continuing to provide analysis and discussion of the</p> | Noted           |

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| needs of small business customers for clean financing options. As a consumer advocate, SBUA ensures the perspectives of small business customers, an often overlooked customer class, are represented in Commission proceedings. For these reasons, SBUA asserts that the Commission should find that SBUA's efforts have been valuable and its request for compensation reasonable given the importance of this class being represented.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                    |
| <p><b>b. Reasonableness of hours claimed:</b> SBUA efficiently focused its limited involvement in this phase of the proceeding to its analysis of the Joint Utilities TOB Proposals and Dunskey Report for narrowly tailored comments on the inclusion of small business customers.</p> <p>SBUA Litigation Supervisor, Jennifer Weberski, a SBUA employee, coordinated SBUA's engagement during the proceeding. Ms. Weberski has over 25 years of utility regulatory experience. Based on SBUA's participation in related utility proceedings and decades of pertinent legal experience, Ms. Weberski efficiently participated in this docket and spent a reasonable amount of time on the proceeding.</p> <p>Experts Francis Wyatt and Theodore Love, employees of Green Energy Economics Group, Inc. (GEEG), undertook the main analysis of the Dunskey Report and proposals that would be necessary and beneficial for small business customers. <u>See Attachment 3 (contract between SBUA and GEEG).</u></p> | Noted              |
| <p><b>c. Allocation of hours by issue:</b> SBUA has assigned the following issue codes:</p> <p><u>Issue 1 – TOB Proposals – Small Business Inclusion</u> = 43.05 hrs/ 100%</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Noted; totals 100% |

**B. Specific Claim:\***

| CLAIMED                             |      |       |         |                                          |            | CPUC AWARD   |                 |            |
|-------------------------------------|------|-------|---------|------------------------------------------|------------|--------------|-----------------|------------|
| ATTORNEY, EXPERT, AND ADVOCATE FEES |      |       |         |                                          |            |              |                 |            |
| Item                                | Year | Hours | Rate \$ | Basis for Rate*                          | Total \$   | Hours        | Rate \$         | Total \$   |
| Jennifer Weberski                   | 2025 | 10.05 | \$760   | D.25-06-029, escalated by 3.46% for 2025 | \$7,638.00 | 10.05        | \$760.00<br>[1] | \$7,638.00 |
| Theodore Love                       | 2025 | 24    | \$370   | D.25-06-065 setting 2023                 | \$8,880.00 | 18.00<br>[4] | \$365.00<br>[2] | \$6,570.00 |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |      |                                                              |         |                                                                                                                     |            |                                                                            |                 |            |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|--------------------------------------------------------------|---------|---------------------------------------------------------------------------------------------------------------------|------------|----------------------------------------------------------------------------|-----------------|------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |      |                                                              |         | rate at \$340,<br>escalated by<br>4.07% for 2024,<br>escalated by<br>3.46% for 2025                                 |            |                                                                            |                 |            |
| Francis<br>Wyatt                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 2025 | 9                                                            | \$380   | D.24-03-070<br>setting 2023<br>rate at \$355,<br>escalated by<br>4.07% for 2024,<br>escalated by<br>3.46% for 2025  | \$3,420.00 | 6.50<br>[4]                                                                | \$380.00<br>[3] | \$2,470.00 |
| Subtotal: \$19,938.00                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |      |                                                              |         |                                                                                                                     |            | Subtotal: \$16,678.00                                                      |                 |            |
| INTERVENOR COMPENSATION CLAIM PREPARATION **                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |      |                                                              |         |                                                                                                                     |            |                                                                            |                 |            |
| Item                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Year | Hours                                                        | Rate \$ | Basis for Rate*                                                                                                     | Total \$   | Hours                                                                      | Rate \$         | Total \$   |
| Jennifer<br>Weberski                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 2026 | 6.0                                                          | \$392.5 | 50% of 2026<br>Rate (\$785),<br>reflecting a<br>3.3% escalation<br>over 2025 rate                                   | \$2,355.00 | 6.00                                                                       | \$392.50<br>[1] | \$2,355.00 |
| Subtotal: \$2,355.00                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |      |                                                              |         |                                                                                                                     |            | Subtotal: \$2,355.00                                                       |                 |            |
| TOTAL REQUEST: \$22,293.00                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |      |                                                              |         |                                                                                                                     |            | TOTAL AWARD: \$19,033.00                                                   |                 |            |
| <p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. 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.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer’s normal hourly rate</p> |      |                                                              |         |                                                                                                                     |            |                                                                            |                 |            |
| ATTORNEY INFORMATION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |      |                                                              |         |                                                                                                                     |            |                                                                            |                 |            |
| Attorney                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |      | Date Admitted to CA<br>BAR <sup>3</sup>                      |         | Member Number                                                                                                       |            | Actions Affecting Eligibility<br>(Yes/No?)<br>If “Yes”, attach explanation |                 |            |
| Jennifer L. Weberski                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |      | Admitted<br>(Connecticut, 1997;<br>Washington D.C.,<br>2003) |         | Conn. Bar No. 414546; D.C.<br>Bar No. 481853. Res. ALJ-<br>393, p. 6 (attorneys eligible<br>for compensation can be |            | No                                                                         |                 |            |

<sup>3</sup> This information may be obtained through the State Bar of California's website at <https://apps.calbar.ca.gov/attorney/LicenseeSearch/QuickSearch>.

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|  |  | licensed in any jurisdiction within the United States). |  |
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**C. Attachments Documenting Specific Claim and Comments on Part III<sup>4</sup>:**

| Attachment or Comment # | Description/Comment                        |
|-------------------------|--------------------------------------------|
| Attachment 1            | Certificate of Service                     |
| Attachment 2            | Timesheets of Attorneys & Experts          |
| Attachment 3            | Contract with Green Energy Economics Group |

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

| Item                                                      | Reason                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| [1] Jennifer Weberski (Weberski) 2025 & 2026 Hourly Rates | <p>D.26-02-056 previously approved the rate of \$760.00 for Weberski in 2025.</p> <p>SBUA requests a rate of \$785.00 for Weberski in 2026. We therefore apply the 3.35% escalation from Resolution ALJ-393 to establish a 2026 hourly rate of \$785.00. As Intervenor Compensation Claim Preparation hours are compensated at ½ preparer’s normal hourly rate, we apply the rate of \$392.50 for Weberski in 2026.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| [2] Theodore Love (Love) 2025 Hourly Rate                 | <p>SBUA has confirmed that Love 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.<sup>5</sup> 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.<sup>6</sup></p> <p>SBUA has confirmed that per the terms of their contract, Love has been hired on a contingency rate basis, meaning that Love 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 Love’s experience as an Expert – Energy and Resources Expert.</p> <p>Given that the 2025 rate range for Expert – Energy and Resources Expert – Level V is \$208.12 to \$396.24, we find the requested 2025 hourly rate of</p> |

<sup>4</sup> Attachments not included in final Decision.

<sup>5</sup> D.07-01-009, D.08-04-010, and ALJ Resolution ALJ 235.

<sup>6</sup> § 1804(d).

| Item                                                       | Reason                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|                                                            | <p>\$370.00 to be excessive. Based on Love’s experience, we determine that an hourly rate of \$365.00 is more reasonable, and adopt it here.</p> <p>The award determined herein for Love’s contribution in this proceeding shall be paid in full to Love, and no portion of this part of the award shall be kept by SBUA. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission’s policy on consultant compensation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <p>[3] Francis Wyatt<br/>(Wyatt) 2025<br/>Hourly Rate</p>  | <p>SBUA has confirmed that Wyatt 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.<sup>7</sup> 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.<sup>8</sup></p> <p>SBUA confirms that per the terms of their contract, Wyatt has been hired on a contingency basis, meaning that Wyatt 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 Wyatt’s experience as an Expert – Energy and Resources Expert.</p> <p>Given the 2025 rate range for Expert – Energy and Resources Expert – Level V is \$208.12 to \$396.24, we find the requested 2025 hourly rate of \$380.00 to be reasonable and we adopt it here.</p> <p>The award determined herein for Wyatt’s contribution in this proceeding shall be paid in full to Wyatt, and no portion of this part of the award shall be kept by SBUA. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission’s policy on consultant compensation.</p> |
| <p>[4] Excessive<br/>Hours<br/>Claimed –<br/>Reviewing</p> | <p>Pub. Util. Code Section 1801.3(f) provides that the Commission should administer the Intervenor Compensation Program “in a manner that avoids unproductive or unnecessary participation that duplicates the participation of</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

<sup>7</sup> D.07-01-009, D.08-04-010, and ALJ Resolution ALJ 235.

<sup>8</sup> § 1804(d).

| Item                                                                                 | Reason                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| Opening Comments                                                                     | <p>similar interests otherwise adequately represented or participation that is not necessary for a fair determination of the proceeding.”</p> <p>Weberski spent 1.50 hours reviewing opening comments on Tarif On-Bill Proposals, which we find appropriate given the breadth of opening comments filed by other parties in this proceeding.</p> <p>However, Wyatt spent 4.00 hours reviewing the same opening comments, which we find excessive given the breadth of the comments filed. We therefore disallow 2.50 hours from Wyatt’s 2025 requested hours.</p> <p>Additionally, Love spent 9.00 hours reviewing the same opening comments, which we find excessive given the breadth of the comments filed. We therefore disallow 6 hours from Love’s 2025 requested hours.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| [5] Intervenor Responsibility for Transparency and Accuracy in Compensation Requests | <p>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.</p> <p>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.</p> <p>The Commission has clear authority to audit intervenors' books and records to verify the basis for any award. Intervenor 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.</p> |

#### PART IV: OPPOSITIONS AND COMMENTS

**Within 30 days after service of this Claim, Commission Staff or any other party may file a response to the Claim (*see* § 1804(c))**

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

1. Small Business Utility Advocates has made a substantial contribution to D.25-12-021.
2. The requested hourly rates for Small Business Utility Advocates' representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$19,033.00.

### **CONCLUSION OF LAW**

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

### **ORDER**

1. Small Business Utility Advocates is awarded \$19,033.00.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and Southern California Gas Company shall pay Small Business Utility Advocates their respective shares of the award, based on their California-jurisdictional electric and gas revenues for the 2025 calendar year, to reflect the year in which the proceeding was primarily litigated. If such data are unavailable, the most recent electric and gas revenue data shall be used. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning April 26, 2026, the 75<sup>th</sup> day after the filing of Small Business Utility Advocates' 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

|                                  |                                                                                                                                             |                           |    |
|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|----|
| <b>Compensation Decision:</b>    |                                                                                                                                             | <b>Modifies Decision?</b> | No |
| <b>Contribution Decision(s):</b> | D2512021                                                                                                                                    |                           |    |
| <b>Proceeding(s):</b>            | R2008022                                                                                                                                    |                           |    |
| <b>Author:</b>                   | ALJ Garrett Toy                                                                                                                             |                           |    |
| <b>Payer(s):</b>                 | Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and Southern California Gas Company |                           |    |

## Intervenor Information

| <b>Intervenor</b>                         | <b>Date Claim Filed</b> | <b>Amount Requested</b> | <b>Amount Awarded</b> | <b>Multiplier?</b> | <b>Reason Change/Disallowance</b>                                      |
|-------------------------------------------|-------------------------|-------------------------|-----------------------|--------------------|------------------------------------------------------------------------|
| SMALL<br>BUSINESS<br>UTILITY<br>ADVOCATES | February 10,<br>2026    | \$22,293.00             | \$19,033.00           | N/A                | See Part III.D, CPUC<br>Comments,<br>Disallowances and<br>Adjustments. |

## Hourly Fee Information

| <b>First Name</b> | <b>Last Name</b> | <b>Attorney, Expert,<br/>or Advocate</b> | <b>Hourly<br/>Fee Requested</b> | <b>Year Hourly<br/>Fee Requested</b> | <b>Hourly<br/>Fee Adopted</b> |
|-------------------|------------------|------------------------------------------|---------------------------------|--------------------------------------|-------------------------------|
| Jennifer          | Weberski         | Attorney                                 | \$760                           | 2025                                 | \$760.00                      |
| Jennifer          | Weberski         | Attorney                                 | \$785                           | 2026                                 | \$785.00                      |
| Theodore          | Love             | Expert                                   | \$370                           | 2025                                 | \$365.00                      |
| Francis           | Wyatt            | Expert                                   | \$380                           | 2025                                 | \$380.00                      |

(END OF APPENDIX)