~~STATE OF CALIFORNIA~~ ~~GAVIN NEWSOM, *Governor*~~

~~PUBLIC UTILITIES COMMISSION~~
~~505 VAN NESS AVENUE~~
~~SAN FRANCISCO, CA 94102-3298~~

~~July 9, 2026~~ **~~Agenda ID #24355~~**
~~Quasi-Legislative~~

~~TO PARTIES OF RECORD IN RULEMAKING 20-02-008:~~

~~This is the proposed decision of President John Reynolds. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's August 13, 2026, Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.~~

~~Parties of record may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure.~~

~~/s/ MICHELLE COOKE~~

~~Michelle Cooke~~
~~Chief Administrative Law Judge~~

~~MLC:cg7~~
~~Attachment~~

Decision ~~**PROPOSED DECISION OF COMMISSINER JOHN REYNOLDS**~~
~~(Mailed 07/09/2026)~~

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Update the California Universal Telephone Service (California LifeLine) Program.	Rulemaking 20-02-008 (Filed February 27, 2020)

DECISION GRANTING COMPENSATION TO THE UTILITY REFORM NETWORK FOR SUBSTANTIAL CONTRIBUTION TO DECISIONS (D.) 24-12-006, D.25-06-003, D.25-08-050, D.25-10-025, D.25-11-008, AND D.23-06-003

Intervenor: The Utility Reform Network	**For contribution to Decisions (D.)** 24-12-006, D.25-06-003, D.25-08-050, D.25-10-025, D.25-11-008, and the implementation of D.23-06-003.
Claimed: $120,295.63	**Awarded:** $74,596.88
Assigned Commissioner: John Reynolds	**Assigned ALJ:** Robyn Purchia

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.23-06-003, in relevant part, approves LifeLine pilot programs to leverage Affordable Connectivity Program (ACP) funding to test LifeLine-supported standalone broadband and mobile broadband offerings. D.24-12-006 temporarily freezes the LifeLine specific support amount (SSA, i.e., the LifeLine subsidy) for wireless and wireline providers at $19.00 per month from January 1, 2025, through the earlier of December 31, 2026, or until the Commission establishes a new methodology for calculating the SSA.

	D.25-06-003 denies the petition to modify D.20-10-006 filed by the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) and TURN. D.25-08-050 approves a three-year, voluntary, technology-neutral, Home Broadband Pilot for eligible households to apply the California Universal Telephone Service Program subsidy to any Commission-approved internet plan meeting the minimum service standards. D.25-10-025 modifies D.24-05-003, which established the Foster Youth Pilot Program within the California Universal Telephone Service Program. D.25-11-008 adopts General Order (GO) 153-A, which incorporates substantive revisions that reflect changes authorized by the Commission in previous decisions, as well as non-substantive revisions.

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812[1]:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	March 10, 2020	Verified
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	August 11, 2006[2]	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:	R.06-05-028	Verified
6. Date of ALJ ruling:	August 29, 2006[3]	Verified. *See* Part I.C.
7. Based on another CPUC determination (specify):	N/A	

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

[2] *See* comment in Part 1.C (Additional Comments on Part 1) below.

[3] *See* comment in Part 1.C (Additional Comments on Part 1) below.

	Intervenor	CPUC Verification
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
Showing of "significant financial hardship" (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	R.04-04-003 A.05-02-027 R.19-01-011	R.19-01-011
10. Date of ALJ ruling:	July 27, 2004[4] November 4, 2005 July 26, 2019	July 26, 2019. *See* Part I.C.
11. Based on another CPUC determination (specify):	N/A	
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.25-11-008	Verified
14. Date of issuance of Final Order or Decision:	11/25/2025	Verified
15. File date of compensation request:	01/23/2026	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
B3, B6, B10	TURN relies on its NOI from R.06-05-028, which was the Commission's early LifeLine proceeding before the current proceeding (R.20-02-008) and the prior LifeLine proceeding (R.11-03-013). Since R.06-05-028, in subsequent orders instituting rulemakings, the Commission retained all intervenor compensation findings and filings. *See* OIR (R.11-03-013) at p. 15; OIR (R.20-02-008) at p. 7. *See also, e.g.,* Decisions 19-01-017 and 20-12-040 (R.11-03-013) (the Commission relied on TURN's NOI and showings from R.06-05-028).	Verified

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):

[4] *See* comment in Part 1.C (Additional Comments on Part 1) below.

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
0. General Introduction This compensation claim includes work on five final decisions in the LifeLine proceeding and the implementation of one other decision. Though there are shared issues, throughlines, or concepts between some of these decisions, most decisions represented in this claim addressed or built on a distinct facet of the program, and most resulted in direct benefits for LifeLine-eligible households. D.23-06-003 created LifeLine pilot programs that allowed subscribers to bundle state LifeLine, federal Lifeline, and federal ACP subsidies for a line of standalone broadband or wireless broadband service. The ACP Pilots, as their name implies, were dependent on the continuance of ACP funding and required the Commission to determine a process for concluding the pilot when the ACP exhausted its funding and began winding down in early 2024. D.24-12-006 temporarily froze the California LifeLine SSA to give the Commission time to calculate a new methodology while controlling costs for both surcharge-payers and LifeLine subscribers. D.25-06-003 denied a petition to modify the LifeLine program to temporarily allow LifeLine subscribers to apply their LifeLine subsidy to standalone broadband as a		We note this is a general introduction of TURN's claim and a summary of the underlying decisions for which they are requesting compensation.

replacement for the federal ACP. The Commission denied this petition on procedural grounds but continued to pursue the concept of a LifeLine subsidy for standalone broadband, which culminated in the LifeLine Broadband Pilot, enacted in D.25-08-050. D.25-10-025 modified the rules of the LifeLine Foster Youth Pilot in response to a Petition for Modification filed by Youth Law Center (YLC), resulting in increased access to the pilot program and the implementation of a non-usage policy. Finally, D.25-11-008 adopted a revised version of the General Order summarizing the LifeLine program rules to codify various prior changes the Commission enacted in the past few years.		
1. The 2022 LifeLine Program Assessment In 2022, the Commission released an assessment of the California LifeLine program in partnership with staff of California State University, Sacramento's Consensus and Collaboration Program (CCP). The Commission then solicited party comment based on the findings of the Program Assessment and how the Commission should update the LifeLine program. a. Applying Affordability Metrics to Subscriber Co-Payments In its reply comments on the Program Assessment, TURN, co-writing with	*See generally* California LifeLine Program Assessment & Evaluation (May 20, 2022).[5] Reply Comments of TURN and GLI on the ALJ's Ruling Requesting Comments on the Program	Public Utilities Code § 1802(j) states that a substantial contribution "has substantially assisted the commission in the making of its order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer." As the Commission has not made a decision on

[5] Available at https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M478/K367/478367564.PDF.

the Greenlining Institute (GLI), recommended that the Commission apply the affordability metrics it developed in R.18-07-006 to the co-payments of LifeLine subscribers, as not all LifeLine co-payments appear to be affordable. The Commission has since opened a new LifeLine Rulemaking, R.25-11-005, and released a staff proposal regarding updates to the California LifeLine SSA and minimum service standards (MSS). This staff proposal includes an affordability review of LifeLine plans with co-payments, in which Staff applies the Commission's affordability ratio metric to LifeLine co-payments varying from $5 to $25 and found that even a $5 co-payment would be unaffordable for some households. The Commission's review of the LifeLine SSA, including subscriber co-payments, remains ongoing, as discussed in further detail below. For an alternative proposal for compensation for the time spent on this issue, please refer to Part III(A)(b) (Reasonableness of hours claimed), below. <u>b. Defending LifeLine Minimum Service Standards</u> TURN responded to a proposal by another party, Cox California, recommending that the California LifeLine program model itself after the federal Affordable Connectivity Program (ACP) and turn LifeLine into	Assessment (TURN Program Assessment Reply Comments) (July 1, 2022) at pp. 6-7. Staff Proposal on LifeLine SSA and MSS, issued in R.25-11-005 (Nov. 3, 2025), at pp. 11-14. Comments of Cox California Telecom, LLC in Response to ALJ Ruling (June 17, 2022) at pp. 4-5. TURN Program Assessment Reply Comments at pp. 1-6.	this issue we deny all hours allocated to this issue without prejudice. *See* Part III.D [1].

a discount that could be applied to a service provider's retail plans. This proposal would effectively eliminate California LifeLine's minimum service standards (MSS) – the minimum amount of voice calling, text messaging, and mobile data a plan must offer to be eligible for the LifeLine subsidy. TURN noted that at the time, ACP was still a new program, and the Commission had previously implemented a pilot program (the Boost/CARE Pilot) hat had allowed subscribers to enroll in the retail plan of their choice. That pilot ended up being difficult to administer and did not accomplish its goals of facilitating LifeLine participation. Consistent with TURN's recommendation, the Commission did not adopt Cox's suggestion. The next year, the Commission issued a proposal for updating the California LifeLine MSS, and, as discussed above, is continuing to examine the issue in the new LifeLine rulemaking, R.25-11-005. For an alternative proposal for compensation for the time spent on this issue, please refer to Part III(A)(b) (Reasonableness of hours claimed), below.	*See generally* Staff Proposal on LifeLine SSA and MSS (Nov. 6, 2023); Staff Proposal on LifeLine SSA and MSS, issued in R.25-11-005 (Nov. 3, 2025).	
2. Wind-Down of the ACP Pilot In the decision establishing the ACP Pilots, the Commission determined the ACP pilots would end "on the date that is the sooner of (a) two years after the effective date of this decision, or (b) on the date that ACP concludes." D.23-06-003 established procedures for participating service providers to notify pilot subscribers of the end of	D.23-06-003 (June 9, 2023) at pp. 17-18.	Verified

ACP Pilot subsidies and, for wireless providers, to transfer their subscribers to standard California LifeLine service plans. In January 2024, the Federal Communications Commission announced that it was beginning to wind down the ACP due to projected exhaustion of funding after April 2024. In comments filed in mid-February 2024, TURN noted the impending end of ACP funding and recommended that the Commission take prompt action to wind down the ACP Pilots as well so that subscribers would receive adequate notice of the end of the Pilots. TURN also noted that the one participating wireline voice provider had not identified a replacement California LifeLine service plan to which it would transfer customers at the end of the ACP Pilots and recommend that it specify a replacement plan. On March 27, 2024, Judge Purchia issued a ruling clarifying that the ACP Pilots would continue through the end of May 2024 and that if the ACP received no further funding by the end of April 2024, participating service providers must begin informing their ACP Pilot subscribers of changes to their service by May 1, 2024.	Reply Comments of TURN on the ALJ's Ruling on Subsidy and Service Standard Staff Proposal (TURN SSA & MSS Replies) (Feb. 16, 2024) at pp. 1-3, 25. ALJ's Ruling Clarifying ACP Pilot Programs will Continue to May 31, 2024 (Mar. 27, 2024).	
3. Work and Advocacy Related to Updating the LifeLine Specific Support Amount and Minimum Service Standards In late 2023, the Commission issued a proposal to update the California LifeLine SSA and MSS. In response to the Commission's request for	Opening Comments of TURN on the ALJ's Ruling on Subsidy and Service Standard Staff Proposal (TURN SSA & MSS	Public Utilities Code § 1802(j) states that a substantial contribution "has substantially assisted the commission in the making of its order or decision because the order or decision has adopted in whole or in part one or

comment on this staff proposal, TURN conducted and presented analysis of relevant wireless and broadband plans and provided recommendations regarding SSA and MSS for wireline and wireless California LifeLine service. With the exception of the SSA freeze, discussed below, the Commission ultimately decided to revisit updates to the SSA and MSS in the successor LifeLine rulemaking, R.25-11-005. In that docket, the Commission has already released and solicited comment on a new SSA and MSS staff proposal, which uses a methodology that reflects the research and advocacy TURN presented in its filings in R.20-02-008. Specifically, in its prior work in this docket, TURN advocated that non-discounted retail offerings from non-LifeLine wireless providers as the upper limit for the wireless SSA, as TURN's analysis of retail wireless plans found that LifeLine providers' retail plans tended to diverge from non-LifeLine providers' retail plans. TURN also presented data that California LifeLine providers had absorbed previous increases in subsidies without commensurate increases in their LifeLine service offerings. In terms of wireline offerings, TURN presented analysis based on data request responses from multiple wireline carriers on their broadband internet offerings and compared them to the proposed speed MSS of 100/20 Gbps and data MSS of 1280 GB, ultimately determining that these proposed broadband MSS were reasonable. TURN also defended the need for broadband MSS.	Opening), (Jan. 24, 2024) at pp. 6-27; TURN SSA & MSS Replies at pp. 5-36. OIR to Update the California LifeLine Program (Nov. 26, 2025) at pp. 5-6 (preliminarily scoping the issues of updating the SSA and updating GO 153 to "incorporate new technology"); November 2025 SSA & MSS Staff Proposal. TURN SSA & MSS Opening at pp. 9-12; TURN SSA & MSS Replies at pp. 10-13, 16-19. TURN SSA & MSS Opening at pp. 25-27; TURN SSA & MSS Replies at pp. 30-31. *See* November 2025 SSA & MSS Staff Proposal at pp. 8-10, 15-16, 20.	more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer." As the Commission has not made a decision on this issue we deny all hours allocated to this issue without prejudice. *See* Part III.D [1].

Accordingly, the new staff proposal reflects this advocacy. For the wireless SSA, the staff proposal analyzed retail plans, including from wireless service providers that do not participate in California LifeLine, and proposed tiers of LifeLine service that use those retail offerings as a ceiling for the new proposed SSA. For the wireline broadband, the speed and data MSS remain the same as the prior staff proposal. For an alternative proposal for compensation for the time spent on this issue, please refer to Part III(A)(b) (Reasonableness of hours claimed), below.		
4. SSA Freeze Introduction The LifeLine SSA is currently based on the most expensive Carrier of Last Resort's (COLR) rates for wireline basic service. AT&T California is the most expensive COLR in California and continues to raise its basic service rates every year, which causes the LifeLine SSA to also increase every year. The Commission announced its intent to revisit this methodology and update the LifeLine minimum service standards (MSS) for both wireline and wireless service in November 2023 with its Staff Proposal on LifeLine Specific Support Amount and Minimum Service Standards (November 2023 Staff Proposal). In comments on the Staff Proposal, TURN and other parties first broached the concept of freezing (i.e., not annually adjusting) the SSA if the Commission needed additional time to revise the SSA methodology.		We note TURN's support of the SSA Freeze and advocacy on behalf of wireline LifeLine subscribers. TURN does not provide specific citations to their claimed contribution here.

In June 2024, the Commission issued a ruling seeking comment on a proposal to freeze the SSA at $19/month until the Commission adopted a new methodology for calculating it. In November 2024, the Commission issued a narrow proposed decision that would do the same. In response, TURN continued to support the concept of an SSA freeze but advocated for limitations that would protect wireline LifeLine subscribers from having to pay unaffordable monthly co-payments. In addition, TURN cited public comments and analyzed LifeLine subscribership data to underscore the need for an SSA that makes wireline co-payments affordable and to support its policy recommendations. D.24-12-006 adopted several of TURN's recommendations to strike an appropriate balance between the need to steward surcharge-payer funds and the need to adequately subsidize LifeLine service.		
<u>4.1 Freezing the SSA as an Interim Solution</u> In response to the November 2023 Staff Proposal, TURN recognized the need to revise the SSA methodology but advocated for further stakeholder input on the LifeLine SSA and MSS before the Commission made any changes. Recognizing that this process and addressing stakeholder concerns could require additional time, TURN, among other parties, recommended freezing the SSA as an interim solution while the Commission developed a new methodology. However, TURN was the only party to	*Compare* TURN Staff Proposal Reply Comments (Feb. 16, 2024) at pp. 5-7 *with* National LifeLine Association (NaLA) Staff Proposal Reply Comments (Feb. 16, 2024) at p. 5 *and* TracFone Staff Proposal Reply Comments (Feb. 16, 2024) at p. 5.	Verified

offer an additional rationale for the freeze: to retain California LifeLine newcomer (and non-Eligible Telecommunications Carrier) Red Pocket and encourage other providers to offer LifeLine plans comparable to non-discounted offerings of non-LifeLine MVNOs. In response to TURN's proposal, the ALJ issued a ruling in May seeking comments on a potential SSA freeze. In response, TURN continued to support a freeze with while addressing affordability concerns of wireline LifeLine customers, discussed further below. The Final Decision froze the SSA for two years to give the Commission time to establish a new methodology.	TURN Reply Comments on ALJ Ruling (June 14, 2024) at p. 1. D.24-12-006 at p. 10, FOF 8, COL 2, OP 1.	
4.2 Distinguishing between the Wireless and Wireline SSA a. Impact of Basic Service Rate Increases on Wireline Customers In its comments on the ALJ Ruling and Proposed Decision, TURN illustrated the impact of basic service rate increases on LifeLine wireline subscribers, who must pay a monthly co-payment to receive LifeLine service. To this end, TURN presented its analysis of comments from AT&T wireline lifeline subscribers from Public Participation Hearings in other Commission proceedings and developed a graph and analysis comparing changes in basic service rates and wireline LifeLine subscribership over time. These unique contributions to the record on consumer perspectives supported TURN's advocacy on the	TURN Reply Comments on ALJ Ruling (June 14, 2024) at pp. 2-3; TURN Opening Comments on the Proposed Decision (Nov. 21, 2024) at pp. 1-3.	Verified

need to consider the impact on wireline LifeLine subscribers over time if AT&T, the largest wireline LifeLine provider, continued to increase its rates while the SSA was frozen. The Final decision expressed the Commission's own ongoing concerns about AT&T's rate increases and acknowledged TURN's concerns about affordability, though the Commission was not persuaded by them. Nonetheless, TURN's work enriched the Commission's deliberation on whether to freeze the SSA. <u>b. Separate Wireless and Wireline Freezes</u> To prevent the co-payments for wireline LifeLine subscribers from becoming unaffordable due to further rate increases by AT&T, TURN recommended that the Commission treat the wireless and wireline SSAs separately. Specifically, TURN recommended not freezing the wireline SSA so that it could increase in response to future rate increases or freezing it at a higher rate than the wireless SSA. AT&T and Cox also made a version of this recommendation, but AT&T did so because it believes that the current COLR methodology is working well for setting the wireline SSA. The Final Decision did not set separate SSAs for wireline and wireless SSAs, but TURN's work presented a solution with a unique rationale that informed the Commission's decision making on how to freeze the SSA.	D.24-12-006 at pp. 9-11. *Compare* TURN Reply Comments on ALJ Ruling (June 14, 2024) at pp. 3-4; TURN Opening Comments on the Proposed Decision (Nov. 21, 2024) at p. 3 *with* AT&T Opening Comments on ALJ Ruling (June 3, 2024) at pp. 2-4 *and* Cox California Reply Comments on ALJ Ruling (June 14, 2024) at pp. 1-2. D.24-12-006 at pp. 10-11.	

4.3 Frozen Subsidy Amount As referenced above, TURN was one of the parties to initially recommend freezing the SSA, and with that recommendation, TURN proposed an amount of $19 per month or 2023's SSA of $17.80 per month. TURN specifically recommended these numbers to encourage the continued LifeLine participation of providers like Red Pocket. The Final Decision adopted one of TURN's proposed amounts and froze SSA at $19.00 per month.		We note TURN's proposal to freeze the SSA at $19 per month. While TURN does not provide specific citations to their claimed contribution here, they stated "as referenced above." Therefore, we verify that the same citations in the above section apply to this issue, i.e. TURN Opening Comments on the Proposed Decision (Nov. 21, 2024) at 3 and D.24-12-006 at 10-11.
4.4 Duration and End of the SSA Freeze In comments on the Proposed Decision, TURN noted that if the Commission took over a year to establish a new SSA methodology, AT&T would have further opportunity to increase its basic service rate. To prevent LifeLine co-payments from becoming unaffordable due to rate increases, TURN recommended that the freeze end after two years or once the Commission establishes a new SSA methodology, whichever occurs first. TURN recommended a two-year freeze because it would give the Commission up to twice the length of the current annual interval for re-evaluating the SSA to establish a new methodology. The Commission modified Final Decision to adopt TURN's recommendation, setting the freeze to	TURN Proposed Decision Opening Comments (Nov. 21, 2024) at pp. 1, 3. "TURN recommends that the Commission modify the proposed decision to end the freeze after two years or when the Commission adopts a new SSA methodology, whichever is	Verified

end on December 31, 2026, or when the Commission establishes a new SSA methodology.	sooner. We are persuaded that a freeze of, at most, two years is reasonable and prudent." D.24-12-006 at p. 14.	
4.5 Suspension of General Order 153, Section 8.5 In comments on the Proposed Decision, TURN noted that the suspension of General Order (GO) 153, Section 8.5 could be overly broad, as Section 8.5 not only tasks Staff with annually setting the SSA but also requires COLRs to submit their basic service rates to the Commission for calculation of the SSA. TURN argued that this information was valuable even during the SSA freeze, as it could inform the Commission's future decisions about re-setting the SSA. The Commission did not adopt this specific recommendation, but TURN's work raised a potential issue with the implementation of the Final Decision that no other party noted.	TURN Proposed Decision Opening Comments (Nov. 21, 2024) at pp. 3-4. D.24-12-006 at COL 3.	Verified
5. Advocacy for an ACP Replacement After the end of the ACP, TURN and other consumer advocates recognized the need for a new program to subsidize standalone broadband. TURN had previously voiced concerns about widespread or unlimited subsidization of standalone broadband service supported by surcharges on only voice services but determined it could support such cross-subsidization on an interim basis to temporarily fill the void left by the ACP, which appeared on the brink of	*See, e.g.,* TURN SSA & MSS Replies at pp. 26-27. Cal Advocates and TURN Emergency Petition for	Verified

exhausting its funding and without hope of further appropriations. In its joint Petition for Modification of D.20-10-006 with Cal Advocates, TURN recommended that for two years, the Commission allow LifeLine subscribers to apply their state and federal subsidies to a standalone wireline broadband service offering that met proposed speed and data MSS. In its replies to other parties, TURN emphasized the limited scope of the proposed modification, describing it as "a temporary bridge akin to a pilot" and advocated against other parties' calls to eliminate proposed MSS for standalone broadband, with TURN emphasizing that LifeLine is a class of service and not a voucher program. In its decision addressing the Petition for Modification, the Commission "overall agree[d]" with TURN's goals, recognizing "that Californians require access to affordable, high-quality broadband service plans" and agreeing that "the Commission should explore ways to make broadband more affordable to Californians." However, the Commission denied the petition on two procedural grounds: the timing of the Petition and the fact that D.20-10-006 only set program SSA and MSS through November 2021. By the time of the issuance of D.25-06-003, the Commission had already released its April 2025 Home Broadband Adoption Report and Ruling Requesting Comments on Strategies to Address the Home Broadband Adoption Gap, discussed in more detail below, and encouraged parties to comment on them. While the	Modification of D.20-10-006 (Apr. 23, 2024). Reply Comments of TURN to Cal Advocates and TURN Emergency Petition for Modification of D.20-10-006 (June 3, 2024), at pp. 2-6. D.25-06-003 at pp. 6-7.	

specific Petition for Modification itself was unsuccessful, during its pendency, the Commission was considering solutions like the one TURN advocated for in the Petition and took action to address the concerns expressed in the Petition regarding sunset of ACP.		
6. The LifeLine Home Broadband Pilot In April 2025, the Commission released the Home Broadband Adoption Report, finding that a "substantial and growing" number of California households cannot afford home broadband service. The report also surveyed the current landscape of telecommunications affordability programs, noting the "significant gap" left by the wind down of the ACP. A ruling soliciting comments for parties on ways to foster home broadband (as opposed to mobile broadband delivered through a smartphone) adoption among low-income households accompanied this report. Some of the questions for comment asked parties about a potential pilot program for subsidizing standalone home broadband and how such a pilot should work, including questions about provider participation, funding, the number of subsidies per household, and what services should be supported.	Home Broadband Adoption Report (Apr. 16, 2025), at pp. 2-3. Home Broadband Adoption Report (Apr. 16, 2025), at pp. 33-34.	Verified
6.1 Need for a Pilot TURN staunchly supported limited-duration support for standalone broadband, either through the main California LifeLine program or a pilot	Opening Comments of TURN on the Assigned Commissioner's Ruling Requesting Comments on	Verified

program—with particular preference for a pilot because of its inherently limited scope and duration.	Strategies to Address the Home Broadband Adoption Gap (TURN Broadband Report Opening Comments) (May 16, 2025), at pp. 2-4.	
Other parties, such as AT&T and CTIA, argued that the Commission should wait on the outcomes of pending legislation (Assembly Bill 535 and Senate Bill 716) before enacting a standalone broadband subsidy pilot. TURN preemptively addressed these concerns by pointing out that there was no guarantee that either would pass, and even if one or both did, a Pilot could complement those efforts by gathering relevant data.	*See, e.g.,* TURN Broadband Report Opening Comments at p. 1. Reply Comments of TURN on the Proposed Decision of Com'r Reynolds Approving Home Broadband Pilot (TURN Broadband PD Reply Comments) (Aug. 19, 2025) at p. 2.	
In response to industry parties' narrow interpretations of the April 2025 Home Broadband Adoption Report and related statistics, TURN argued that in addition to providing previously unconnected households with broadband, another critical benefit of the Home Broadband Pilot would be to keep households who could not consistently afford broadband connected.	Reply Comments of TURN on the Assigned Commissioner's Ruling Requesting Comments on Strategies to Address the Home Broadband Adoption Gap (Broadband Report Reply Comments) (May 28, 2025) at pp. 6-10; Reply Comments of TURN on the PD Approving Home Broadband Pilot (TURN Broadband PD Reply Comments) (Aug. 19, 2025) at pp.	Reply Comments of TURN on the PD Approving Home Broadband Pilot (Aug. 19, 2025) at 2.
After the Home Broadband Adoption Report, The Commission proceeded to issue a proposed decision establishing the Home Broadband Pilot. It and the final decision, D.25-08-050, recognized the need for a broadband subsidy program, as advocated for by	D.25-08-050 (Sept. 4, 2025) at p. 9 ("[W]e have identified a need for California LifeLine to subsidize affordable home broadband for low-income Californians. As such, we	

TURN, which could complement any related legislation the Legislature enacted.	authorize the Home Broadband Pilot."), FOFs 11-12, COL 1. D.25-08-050 at pp. 12-13 ("Cal Advocates and TURN encourage the Commission to 'act now' with a pilot, which may complement the Legislature's intent 'to support broadband services for low-income households through low-cost plans and subsidized plans . . . .' We agree with Cal Advocates and TURN. There is an immediate need for the California LifeLine program to expand to offer access to affordable home broadband for low-income Californians.").	
6.2 Broadband Pilot MSS & SSA a. Subsidy Amount TURN recommended a subsidy amount that would remain set for the entire pilot for stability and supported multiple tiers of service. TURN supported a subsidy amount of \$20/month for standalone broadband and noted other parties were converging on this number as well. The Commission adopted an SSA of \$20/month for standalone broadband and a separate SSA tier of \$30/month for bundled wireline broadband and voice. b. Federal Funding & ETC Designations TURN recommended that the Commission not require participating	TURN Broadband Report Opening Comments at pp. 11-12. TURN Broadband Report Reply Comments at pp. 12-13. D.25-08-050 at pp. 19-20, COL 8, OP 3. Broadband Report Opening Comments at pp. 12, 16. Opening Comments of TURN on the PD	Verified

service providers to have an ETC designation to maximize service provider participation. Additionally, TURN recommended that the Commission make up the lost federal subsidy for both (1) subscribers who qualify for LifeLine through the California-only eligibility criteria and (2) for Tribally-owned and -operated service providers that do not have an ETC designation. TURN argued that not making up the federal subsidy for California-only subscribers would effectively create a second class of service and make Pilot participation more difficult for those subscribers. For Tribal providers, TURN highlighted the unique situation of Tribally-owned service providers, high cost of broadband service on Tribal lands, and low rates of LifeLine participation in Tribal communities. The Commission decided to adopt TURN's recommendation and not require participating service providers to have an ETC designation but declined to make up lost funding for Tribal service providers, citing cost concerns. <u>c. MSS for Broadband</u> In its comments, TURN recommended that the Commission adopt MSS for Pilot-supported broadband that met or exceeded the current broadband MSS for federal Lifeline to guarantee that ETCs participating in the Home Broadband Pilot would be eligible for federal subsidies. TURN advocated for broadband MSS as means to steward LifeLine funds, facilitate Pilot administration, and meet subscriber needs while minimizing upselling.	Approving Home Broadband Pilot (TURN Broadband PD Opening Comments) (Aug. 14, 2025), at pp. 4-8. D.25-08-050 at p. 31, FOFs 27, 30, COLs 22-23. TURN Broadband Report Opening Comments at pp. 8-11. D.25-08-050 at p. 24, COL 13.	

The Commission adopted a technology-neutral broadband speed MSS of 100/20 Mbps and a data MSS of 1280 GB per month, consistent with the broadband MSS for federal Lifeline. d. MSS for Bundled Voice Service The Proposed Decision version of D.25-08-050 did not establish MSS for voice service bundled with home broadband service. TURN recommended that the Commission establish MSS for bundled voice service to ensure that subscribers who chose to receive bundled service would receive access to voice service robust enough to meet their needs and allow them to participate in modern society. Specifically, TURN recommended that the Commission adopt MSS that at least met the voice MSS for federal LifeLine. Commission declined to set MSS for bundled voice service. Nonetheless, TURN raised important consumer concerns to inform the Commission's decision-making on bundled service offerings. e. Cost of Equipment In its opening comments, Charter "recommended" that the Commission "confirm" that providers could pass on the costs of equipment like modems and routers. TURN opposed this recommendation, arguing that equipment costs could become hidden fees of pilot participation and a barrier to participation.	TURN Broadband Pilot PD Opening Comments at pp. 1-4. D.25-08-050 at p. 20, COL 7. TURN Broadband Pilot PD Reply Comments at pp. 4-5. D.25-08-050 at pp. 21-22, FOF 21.	

In the final decision, the Commission stopped short of requiring participating service providers to provide equipment for free but did partially adopt TURN's recommendation by encouraging providers to offer such equipment for free.		
6.3 Supported Technologies a. Essential Nature of Voice and Broadband In its opening comments on the Home Broadband Adoption Report, TURN emphasized the important role of voice and home broadband service and that households should not have to forgo one to access the other. As discussed above, the Commission authorized a bundled tier of Home Broadband Pilot service that includes voice service. b. Technology Neutrality The National LifeLine Association (NaLA), opposed the concept of limiting the Home Broadband Pilot to home broadband and instead advocated for a version of technology neutrality that included Home Broadband Pilot support for mobile broadband. TURN supported limiting the Home Broadband Pilot to technologies that provided home broadband and meet the Pilot's MSS to most directly advance the Pilot's goals of home broadband adoption. TURN also pointed out that wireless providers were already free to participate in California and federal Lifeline and receive comparable subsidies.	TURN Broadband Report Opening Comments at pp. 4-7. D.25-08-050 at pp. 19-20, COL 8, OP 3. NaLA PD Opening Comments (Aug. 14, 2025) at pp. 2-4, 6. TURN Broadband Pilot PD Reply Comments at pp. 2-3. D.25-08-050 at p. 38 ("[T]he MSS is designed to fulfill the Pilot's objective of making broadband	Verified

The Commission agreed with TURN and found the Home Broadband Pilot could be technology neutral without supporting mobile broadband.	services that reflect Californians' substantial data usage needs affordable . . . . We also agree with TURN's assertion that subscribers may already receive mobile broadband service through California LifeLine's existing combined state and federal subsidy of $28.25 a month.").	
6.4 Broadband Pilot Parameters a. Duration and Review TURN recommended a two-year pilot with regular analysis and presentation of pilot data. The Commission decided on a three-year duration for the Home Broadband Pilot, with Staff conducting analysis within 18 months of the Pilot's launch and sharing that analysis and related recommendations within 20 months of the Pilot's launch. b. Data Reporting TURN recommended that participating service providers should submit data on a monthly basis regarding subscribership rates, speed, and subscriber data consumption. TURN also supported a waiver for data consumption reporting for participating service providers that do not have systems to track subscriber data consumption. Finally, TURN defended the data reporting requirements in the proposed decision version of D.25-08-050 when other providers argued for reducing them.	TURN Broadband Report Opening Comments at p. 18. D.25-08-050 at p. 15, FOFs 14-15, COL 4. TURN Broadband Report Opening Comments at p. 18. TURN Broadband Pilot PD Reply Comments at pp. 3-4. D.25-08-050 at p. 42, COLs 5, 29-32, OP 2.	Verified Also, D.25-08-050 at 34.

The Commission struck a balance and decided that providers would report data every six months, which would include information on data consumption, subscribership, and plan information. The Commission declined to adopt a waiver on data consumption tracking, highlighting the need to granularly track data consumption to ensure the Pilot provides service that meet subscriber needs. However, the Commission noted that D.25-08-050 authorized Staff to revise the Home Broadband Pilot requirements if needed.	D.25-08-050 at p. 42, COL 3, OP 6. TURN Broadband Report Opening Comments at pp. 7-8.	
<u>c. Subscriber Eligibility</u> TURN recommended at a minimum, the Commission should use the existing California LifeLine eligibility criteria and consider expanding it, such using a more expansive metric for income eligibility. In response to the Proposed Decision applying the one per household rule to the Home Broadband Pilot, TURN recommend that the Commission modify the Proposed Decision to clarify that Pilot subscribers sharing the same address could each remain eligible for the Pilot or LifeLine by filling out the household economic worksheet.	TURN Broadband Pilot PD Opening Comments at pp. 8-9. D.25-08-050 at p. 18, FOF 19.	
The Commission decided to use the established California LifeLine eligibility criteria for the Home Broadband Pilot. D.25-08-050 did not provide clarification on the use of the household economic worksheet, but TURN's work raised an important administrative question for the Commission to consider.	TURN Broadband Report Reply Comments at pp. 18-19. TURN Broadband Pilot PD Reply Comments at p. 5.	
<u>d. Marketing Requirements</u>		

In response to providers' advocacy to limit them, TURN defended Home Broadband Pilot advertising requirements for participating providers, highlighting the general lack of awareness of the California LifeLine program. TURN also defended the requirement for service providers to warn standalone broadband customers about a lack of access to 911 from Charter's advocacy against it. TURN further recommended a requirement similar to one in the ACP pilot where providers were required to collect a phone number from standalone broadband subscribers. Ultimately, the Commission decided to require participating service providers to notify households of their affordable internet plans and submit a marketing plan with example materials to the Communication Division for review. The Commission did not require Home Broadband Pilot service providers to collect phone numbers of standalone broadband subscribers but did require providers to inform subscribers that standalone broadband plans do not include voice service for 911 access. <u>e. Provider Filings</u> TURN recommended that the Commission should require service providers participating in the Home Broadband Pilot to submit an advice letter with information about service offerings in order for those plans to be eligible for pilot subsidies. Specifically, TURN recommended that this type of advice letter should include information on the plan's minimum speed, data allowance, and	D.25-08-050 at p. 28, COLs 16-19. TURN Broadband Report Opening Comments at p. 9. D.25-08-050 at pp. 32-33, OP 2.	

information on included, additional services or benefits, and an accounting of costs and subsidies. D.25-08-050 requires providers wanting to participate in the Home Broadband Pilot to submit a Tier 2 advice letter that lists "all internet service plans and bundles that meet the minimum service standards including details of any promotional plan pricing that is scheduled to increase at a set interval."		
7. Foster Youth Pilot Introduction The Commission first authorized a California LifeLine pilot program dedicated to serving California's foster youth since May 2019, when it authorized the iFoster Pilot. The iFoster Pilot ran until July 31, 2024, when it was replaced by the current Foster Youth Pilot. The Foster Youth Pilot differed in some details from the iFoster Pilot in terms of eligibility, the participating service provider, and third-party administrator (TPA). The Foster Youth Pilot differs from the main California LifeLine program in many key respects. Unlike the California LifeLine program, the Foster Youth Pilot supports only wireless service, provides phones (devices) to subscribers, and upon inception was available only to youth currently in foster care. When launched, the Foster Youth Pilot also had no requirements for renewing eligibility or rules regarding disconnection for non-usage of service.		We note TURN's participation in commenting on Youth Law Center's Petition for Modification to modify the decision authorizing the Foster Youth Pilot. TURN does not provide specific citations to their claimed contribution here.

In February 2025, Youth Law Center (YLC) filed a Petition for Modification (PFM) to modify the decision authorizing the Foster Youth Pilot, in which it requested changes to the Pilot rules to expand eligibility and better align the program with the Foster Youth Bill of Rights and realities of the foster care system. The Commission solicited party comment on the petition and issued a staff proposal and proposed decision before voting out a final decision that enacted changes to the Foster Youth Pilot rules recommended by TURN and YLC.		
7.1 A Non-Usage Rule During the development of the Foster Youth Pilot, TURN had advocated for a non-usage rule or policy of downgrading service for inactive subscribers, as the prior iFoster Pilot had no service usage requirements and saw a large number of consistently inactive lines—service that the California LifeLine fund was paying for and going unused. The Commission ultimately approved the Foster Youth Pilot without a non-usage rule, citing the need to give staff the "flexibility to procure wireless service." However, by the time of YLC's Petition, the Foster Youth Pilot had a service provider (TracFone/Verizon Value), and TURN repeated its prior recommendation that the Commission revisit the question of a non-usage rule when the Foster Youth Pilot was more established. a. Triggering Period of Inactivity	D.24-05-003 at pp. 21-22. Response of TURN to the PFM of YLC to Modify D.24-05-003 (TURN YLC PFM Response) (Mar. 26, 2025), at pp. 4-5. TURN YLC PFM Response at p. 5.	Verified

TURN recommended that the Commission and parties use usage data from the Foster Youth Pilot to determine an appropriate non-usage rule. However, for a significant period of the Commission's consideration of the YLC PFM, delays in distributing activated devices to subscribers were resulting in falsely high rates of non-usage.	Opening Comments of TURN on the ALJ's Ruling Admitting Staff Proposal (TURN YLC PFM Staff Proposal Opening Comments) (June 27, 2025) at pp. 2-3. *See* D.24-05-003 at p. 21.	
In the Staff Proposal, Staff proposed that subscribers inactive for 90 days be de-enrolled from the Foster Youth Pilot. This was shorter than the 6-month period of inactivity TURN had previously contemplated, but Staff also proposed measures that would facilitate re-enrollment of previously de-enrolled subscribers, which TURN supported as striking an appropriate balance between maintaining service and de-enrolling inactive subscribers.	D.25-10-025 at p. 26, FOF 9, COL 3, OP 2.	
In D.25-10-025, the Commission enacted a non-usage rule that would result in termination of service for a Foster Youth Pilot subscriber on their 91st day of inactivity.	TURN YLC PFM Staff Proposal Opening Comments (June 27, 2025) at pp. 2-3.	
<u>b. Outreach to Inactive Subscribers</u> In response to the Staff Proposal's recommended non-usage rule and proposal for TPA outreach to inactive subscribers, TURN recommended that the TPA use multiple methods of contacting inactive subscribers when possible, such as e-mail, and not just outreach reliant on a subscriber's device, which could be lost or broken, resulting in that subscriber losing their service. TURN also recommended that TPA outreach include instructions on how to request a replacement device.	D.25-10-025 at pp. 25-26, COL 3, OP 2.	

In D.25-10-025, the Commission adopted TURN's recommendations.		
7.2 Expanding Pilot Eligibility to Former Foster Youth As part of its PFM, YLC advocated that the Commission expand Foster Youth Pilot eligibility to allow former foster youth under the age of 21 to remain eligible in the pilot if they had previously been in care when they were 13 or older. As support for this recommendation, YLC cited a University of Chicago study on foster-care re-entry and the expertise of its executive director. TURN supported this recommendation and in its response to YLC's PFM, TURN presented its own complementary analysis of California foster care statistics and other studies of foster care re-entry to support expanding eligibility. TURN also argued that maintaining eligibility would be more efficient for all parties in cases where subscribers re-entered foster care. Moreover, TURN reviewed Foster Youth Pilot enrollment statistics, enrollment in the prior iFoster Pilot, and the Foster Youth Pilot's unofficial enrollment goals to determine that expanding eligibility would not immediately trigger budgetary concerns. In D.25-10-025, the Commission expanded Foster Youth Pilot eligibility to include former foster youth under age 21 who were in foster care on or after their 13th birthday.	Petition of YLC to Modify D.24-05-003 (Feb. 24, 2025), at pp. 7-9. TURN YLC PFM Response at pp. 1-4. D.25-10-025 at pp. 10-11, COL 1, OP 1.	Verified The correct citation is D.25-10-025 at 8-9, COL 1, OP 1.

<u>7.3 The One Benefit Per Household Rule</u> In its opening comments on the Foster Youth Staff Proposal, YLC raised concerns with the application of the California LifeLine program's one benefit per household rule to households in cases where multiple siblings enrolled in the Foster Youth Pilot exit care to reunify with their parents. Because the Foster Youth Pilot was now poised to expand eligibility to *former* foster youth, the Commission needed to consider the implications of the standard one benefit per household rule to this type of scenario. TURN provided additional analysis explaining that the household economic worksheet, which is used to allow for multiple lines of LifeLine-supported service at the same address when each belongs to a *separate household*, would not be a solution for reunified families, who would presumably be one household sharing resources. Therefore, TURN recommended that the Commission waive the one benefit per household rule for the Foster Youth Pilot to prevent the unintentional creation of disincentives for otherwise feasible family reunification. TURN also advocated for the Commission to waive the one per household rule so that the same household could participate in both California LifeLine and the Foster Youth Pilot, highlighting that low-income families are disproportionately involved in the child welfare system and therefore disproportionately eligible for LifeLine.	YLC PFM Staff Proposal Opening Comments (June 27, 2025) at pp. 4-5. TURN PFM Staff Proposal Reply Comments (July 11, 2025), at pp. 1-3. D.25-10-025 at pp. 9-10, 32-33, COL 2, OP 2.	Verified

The Commission adopted TURN's specific recommendation to waive the one benefit per household rule for Foster Youth Pilot subscribers for the duration of the Foster Youth Pilot. However, the Commission determined that allowing the same household to simultaneously participate in the California LifeLine program and Foster Youth Pilot would be a waiver of the Moore Act's statutory requirements for the permanent California LifeLine program, which it could not do.		
<u>7.4 Database Eligibility Verification of Foster Youth Pilot Applicants</u> TURN supported a recommendation in the Foster Youth Staff Proposal for the Commission to enter data sharing agreements with California Department of Social Services databases to facilitate eligibility verification of Foster Youth Pilot applicants. These data sharing agreements would be an alternative to the then-accepted forms of eligibility verification, ward of court and county dependency letters. In its opening comments, TURN supported this recommendation and provided additional context and statistics on database matching agreements in the California LifeLine program and their positive impact on the enrollment and renewals processes. In D.25-10-025, the Commission agreed with TURN that database matching would be a reasonable alternative method of verifying eligibility for Foster Youth Pilot applicants and adopted decisions to	TURN PFM Staff Proposal Reply Comments at pp. 3-4. D.25-10-025 at pp. 14-15 ("Here, we agree with TURN and Staff that . . . developing a limited database matching agreement with CDSS are reasonable alternatives to the ward of court and county dependency letters."), COL 1, OP 1.	Verified The correct citation is TURN PFM Staff Proposal Opening Comments (June 27, 2025) at 1-3.

the Foster Youth Pilot rules that would allow through verification through "an established database match."		
7.5 Maintaining Caregiver-Initiated Enrollment for Minor Foster Youth The Foster Youth Staff Proposal Proposed redlines to D.24-05-003 to effectuate many of the recommendations in YLC's Petition for Modification. However, TURN noticed that some of these proposed redlines would remove "Authorized Applicants" as parties who can submit Foster Youth Pilot applications for minor foster youth, effectively eliminating caregiver-initiated applications as a way for minor foster youth to apply, which appeared contrary to the goals of the Petition for Modification and Foster Youth Staff Proposal. Instead, TURN recommended alternative language based on prior YLC-recommended terminology that would expand minor foster youth's options for applying to the Foster Youth Pilot. In D.25-10-025, the Commission modified the Foster Youth Pilot rules to expand the people who could sign a Foster Youth Pilot application on behalf of a minor foster youth without eliminating the option for caregiver-initiated applications.	TURN PFM Staff Proposal Opening Comments at pp. 1-2. *See also* TURN PFM Staff Proposal Reply comments at p. 4. *See* D.25-10-025 at p. 19, COL 1, OP 1.	Verified
7.6 Giving Pilot Subscribers the Ability to Transition to California LifeLine when They Turn 18 The Foster Youth Staff Proposal recommended that Foster Youth Pilot subscribers have the option to enroll in California LifeLine when they turn 18.	TURN PFM Staff Proposal Opening Comments at p. 3.	Verified

TURN provided additional analysis and policy rationales to support this option, including the fact that non-minor foster youth would have a greater choice of service providers in the California LifeLine program. Moreover, as California LifeLine subscribers, non-minor foster youth and former foster youth would also be eligible for federal Lifeline subsidies. D.25-10-025 adopted this recommendation and expressly noted TURN's analysis about additional choices of service providers.	D.25-10-025 at pp. 29-30, COL 1, OP 1.	
8. Modifications to GO 153 Introduction In October 2025, the Commission issued a proposed decision to update GO 153, the general order codifying the California LifeLine rules, pursuant to prior Commission decisions. At that point, Commission had most recently modified GO 153 in September 2021, and in the intervening years, the Commission had issued other decisions affecting the LifeLine program rules, such as the changes to the registration framework for VoIP providers in D.24-11-003 and the Universal Service Public Purpose Program surcharge reporting and remitting requirements in D.22-10-021.		We note TURN's summary of the modifications to GO 153. TURN does not provide specific citations to their claimed contribution here.
8.1 VoIP Providers Participating in LifeLine as Wireline Providers In its opening comments, TURN noted that the GO 153 Proposed Decision and accompanying redlines to GO 153 would state that VoIP providers were	TURN GO 153 PD Opening Comments (Nov. 4, 2025) at pp. 1-2.	Verified

required to have a Certificate of Public Convenience and Necessity (CPCN) when in fact the new VoIP registration framework requires non-facilities-based providers of interconnected fixed VoIP to obtain Section 1013 operating authority in the form of a VoIP provider-specific designation. TURN recommended changes to GO 153 modifying the language used to describe the possible forms of VoIP providers' operating authority. Relatedly, in its opening comments, Charter raised the fact that some VoIP providers had been participating in LifeLine as wireline providers and that the redlines in the GO 153 Proposed Decisions would create confusion as to what set of LifeLine service elements those providers must offer to their LifeLine subscribers. Charter recommended that VoIP providers be required to offer the wireline LifeLine service elements instead. TURN, co-writing with CforAT, disagreed, and highlighted certain elements of wireline LifeLine service that VoIP providers may be unable to offer due to differences in underlying technology and VoIP-specific metrics VoIP providers were required to report. Instead, TURN recommended that the Commission allow VoIP providers participating in LifeLine as wireline providers to continue doing so. In D.25-11-008, the Commission updated GO 153 to specify that VoIP providers without a CPCN would continue to be required to provide the VoIP-specific service elements.	Charter GO 153 PD Opening Comments (Nov. 4, 2025), at pp. 3-6. TURN GO 153 PD Reply Comments (Nov. 10, 2025), at pp. 1-3. D.25-11-008, Appendix A, § 7.2, Appendix B.	

8.2 Description of initiating LifeLine service The GO 153 Proposed Decision would have updated the definition of a LifeLine "Application Date" to "The date a new or existing Customer communicates verbally with his/her California LifeLine Service Provider and requests LifeLine Service." TURN pointed out in its opening comments that this language too narrowly described the way LifeLine applicants may request service, as the Commission is creating a new enrollment pathway for applicants without Social Security Numbers (SSNs) that would not begin with service providers, and some providers accept California LifeLine applications through their websites. TURN proposed its own updated definition for "Application Date" as "The date a new or existing Customer requests LifeLine Service." In response to comments by other parties, the Commission declined to adopt TURN's specific recommendation, instead deciding that a change to the definition of "Application Date" required further record development. TURN raised important considerations regarding potential changes to the definition for this term, which the Commission may further examine when it considers future modifications to GO 153, which it may do as part of R.25-11-005.	TURN GO 153 PD Opening Comments at pp. 2-3. D.25-11-008 at p. 9. *See* OIR to Update the California LifeLine Program at p. 6 (preliminarily scoping the issue of "[u]pdating General Order 153 to reflect changes made through decisions issued in this proceeding, as well as to incorporate new technology, legislation, policies, and other developments.").	Verified
8.3 Removing References to the Social Security Number Requirement		Verified

In its opening comments, TURN noted that the proposed redlines to GO 153 did not modify portions of GO 153 that required applicants to provide SSNs, a requirement that had been eliminated in D.25-10-003. TURN recommended redlines to GO 153 to modify specific language stating or implying that SSNs are required to apply for or participate in LifeLine. The final version of D.25-11-008 implemented redlines that updated the language in GO 153 to no longer require SSNs in the sections TURN identified. Moreover, the final version of D.25-11-008 to include D.25-10-003 in the list of decisions and resolutions necessitating substantive changes to GO 153.	TURN GO 153 PD Opening Comments at pp. 3-4. *See* D.25-11-008 at Appendix A, §§ 5.4.2.2, 5.12.4. *Compare* GO 153 Proposed Decision (Oct. 15, 2025) at pp. 4-5 *with* D.25-11-008 at p. 5.	The correct decision reference is D.25-10-033 not D.25-10-003. The correct decision reference is D.25-10-033 not D.25-10-003.
<u>8.4 Accuracy of Updated Hyperlinks</u> The GO 153 Proposed Decision proposed redlines to update various hyperlinks that appeared in the text of GO 153. However, TURN noted in its opening comments that specific links led to a "Page not found" page on the Commission's website. In D.25-11-008, the Commission updated these links so that they lead to the intended webpages.	TURN GO 153 PD Opening Comments at p. 4. D.25-11-008 at p. 11 ("This decision adopts the other party recommendations, including ensuring hyperlinks are active . . . ."), Appendix A, §§ 5.9, 10.2.	Verified
<u>8.5 Decisions Superseding D.22-10-021</u> In its opening comments, AT&T recommended against the GO 153 Proposed Decision's added language of "and any subsequent decision or	TURN GO 153 PD Reply Comments at pp. 3-4.	Verified

order superseding D.22-10-021" to Section 11.1.1 of GO 153. TURN, co-writing with CforAT, defended the addition of this language, noting that future updates to California LifeLine could take time to be reflected in GO 153 and that the language "any subsequent decision or order superseding D.22-10-021" could be important in preventing confusion. In D.25-11-008, the Commission added the language "any subsequent decision or order superseding D.22-10-021" to GO 153.	D.25-11-008 at p. 11 ("We agree with TURN/CforAT that it is necessary to revise Section 11.1.1 to identify D.22-10-021 or any subsequent decision or order superseding D.22-10- 021 as the authority for the decision."), Appendix A, § 11.1.1.	

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

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: The Center for Accessible Technology (CforAT), Greenlining Institute (GLI), Cal Advocates, Youth Law Center (YLC), California Emerging Technology Fund (CETF)		Noted
d. Intervenor's claim of non-duplication: Because of the breadth of issues examined in this rulemaking, many parties, including other consumer advocates and public interest groups, participated in various aspects of R.20-02-008. TURN made efforts to coordinate with these other parties to the extent its interests and positions aligned with theirs. This coordination and cooperation reduced the total cost of TURN's intervenor participation. When TURN did not work jointly with other parties, TURN leveraged its wide-ranging expertise in the California LifeLine program to present unique analysis, recommendations, and research for the Commission to consider. The fact		Noted

that other parties shared TURN's perspective on various issues did not result in undue duplication with those parties. TURN argued in support of its independent perspective while supporting those of other intervenors, thereby contributing to a full record upon which the Commission could base its determinations in its final decisions. Both TURN and CforAT participated in the development of some of the final decisions represented in this claim; both organizations participated in the development of the SSA freeze, Home Broadband Pilot, and modifications to GO-153. As both groups are consumer advocates, concerns about affordable basic service for LifeLine subscribers and stewardship of LifeLine program funds guided both organizations' participation in this docket. However, at times TURN and CforAT recommended different approaches to address certain issues, and, as a result, decided to file separate comments to reflect those unique approaches. For example, TURN and CforAT both were concerned about how SSA Freeze Proposed Decision did not specify a timeline for the freeze and the impact an extended freeze could have on LifeLine subscribers. To address this concern, TURN proposed a two-year sunset to the freeze, and CforAT recommended that the Commission annually review the SSA and adjust it if needed.[6] As another example, both TURN and CforAT rebutted arguments regarding the technology neutrality of the Home Broadband Pilot, but TURN pointed out that the main California LifeLine program supported wireless service, and CforAT cited to Commission precendent on the concept of technology neutrality.[7] For TURN and CforAT's joint reply comments on the Proposed Decision modifying GO 153, TURN and CforAT jointly decided upon positions and which issues to prioritize, and TURN was the main drafter of the filing, with CforAT providing review and feedback. TURN and GLI worked jointly on the 2022 Program Assessment reply comments included in this compensation claim. In this case, TURN was the lead drafter on the issues covered, with GLI providing review and feedback. Cal Advocates is a party to this proceeding but did not participate in the development of every decision represented in this compensation claim. For example, Cal Advocates did not weigh in on the SSA freeze or proposed modifications to the Foster Youth Pilot or GO 153. In areas	

[6] *Compare* TURN Proposed Decision Opening Comments (Nov. 21, 2024) at pp. 1, 3. *with* CforAT Proposed Decision Comments (Nov. 21, 2024) at pp. 1-2.

[7] *Compare* TURN Broadband Pilot PD Reply Comments at pp. 2-3 *with* CforAT Reply Comments on Proposed Decision Approving Home Broadband Pilot (Aug. 19, 2025) at pp. 3-4.

where both TURN and Cal Advocates participated, the two groups often had different recommendations and approaches. For example, both TURN and Cal Advocates supported the creation of the Home Broadband Pilot. TURN made additional efforts to defend the idea of a broadband subsidy pilot by rebutting other parties' characterizations of the Home Broadband Adoption Report and arguments about the state of broadband availability, while Cal Advocates recommended mandating a low-income plan from internet service providers operating in California and presented analysis of the costs of doing so.[8] For another example, TURN and Cal Advocates both commented on the 2023 SSA and MSS Staff Proposal, but TURN conducted unique data analysis to support its recommendations. TURN and Cal Advocates sought opportunities to coordinate or work together where their interests and proposed solutions aligned, such as jointly filing the petition to modify D.20-10-006. YLC participated in this proceeding only on matters concerning the Foster Youth Pilot. YLC's and TURN's work on Foster Youth Pilot issues was complementary, with YLC using its expertise in the foster care system and related law to make recommendations on pilot program modifications, and TURN contributing its expertise on the California LifeLine program and prior iFoster Pilot to make recommendations about how to address administrative issues or ways to implement YLC's proposed modifications. For example, as discussed in the Substantial Contribution section, YLC noted concerns about continuing Foster Youth Pilot eligibility for siblings reunifying with their parents; TURN recommended that the Commission address this issue by waiving the one per household rule for the Foster Youth Pilot. TURN and YLC also coordinated on which substantive issues each organization would address in its filings. During the period covered in this compensation claim, CETF only participated in this docket on the Home Broadband Pilot. While both TURN and CETF both supported the adoption of the Home Broadband Pilot, TURN highlighted the benefits of connecting the subscription-vulnerable and rebutted of other parties' arguments and characterizations of the related staff report, and CETF provided unique support and insight as the sponsor of relevant legislation (SB 716).[9]	

[8] *Compare* TURN Broadband Report Reply Comments at pp. 1-2, 6-10, 13-14 *with* Opening Comments of Cal Advocates on the Assigned Commissioner's Ruling Requesting Comments on Strategies to Address the Home Broadband Gap (May 16, 2025), at pp. 2-3, Attachment A.

[9] *Compare* TURN Broadband Report Opening Comments at pp. 2-4 *and* TURN Broadband Report Reply Comments at pp. 1-2, 6-10, 13-14 *with* Comments of CETF on Proposed Decision Requesting Comments on the Home Broadband Adoption Pilot on R.20-02-008 (Aug. 14, 2025) at pp. 1-2.

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: TURN's request for intervenor compensation seeks an award of approximately $120,295.63 as the reasonable cost of TURN's participation in the proceeding. The savings to LifeLine surcharge-payers exceeds the cost of TURN's participation in the development of the SSA freeze. Had the freeze not taken effect, the SSA would have increased in 2025 from $19 to $20.65 per month, or an increase in expenditures of $1.65 per LifeLine subscriber per month (see Attachment 4). LifeLine subscribership varies from month to month, but it tends to increase. Multiplying the January 2025 LifeLine subscribership (1,659,822 subscribers – see Attachment 5) by the $1.65 in avoided SSA increases yields a savings of at least $2,738,706.30 per month for up to 24 months. At time of filing, the SSA freeze has been in effect for one year, meaning the SSA freeze has resulted in a savings of at least $32,864,475.60 for surcharge payers. The benefits of TURN's participation on other issues, as is often the case for telecommunications proceedings in recent years, is more difficult to quantify, as it does not pertain to rates, subsidies, or surcharges. On these issues, TURN's advocacy helped achieve an outcome with clear and substantial benefits to Californians in AT&T's service territory, though hard to quantify. It is hard, if not impossible, to attach a monetary amount to the value of a former foster youth being able to apply for their first job through their Foster Youth Pilot device, or the children of a low-income household being able to do their homework at home instead of in a fast food restaurant's parking lot[10] because the Home Broadband Pilot has made home internet affordable for their family. In this proceeding, TURN worked to expand the California LifeLine program—both main program offerings and pilot programs—while keeping surcharges affordable through its advocacy. TURN's work directly contributed to the development of one	After the adjustments made to this claim, the remainder of the claimed costs are reasonable. *See* Part III.D [1].

[10] *See, e.g.,* Alisha Ebrahimji, School sends California family a hotspot after students went to Taco Bell to use their free WiFi, CNN (Auh. 31, 2020), available at https://www.cnn.com/2020/08/31/us/taco-bell-california-students-wifi-trnd.

	CPUC Discussion
pilot program, updates to another, updates to GO 153, a temporary change to the LifeLine SSA, the foundation for further updates to the program SSA and MSS. TURN strongly recommends that the Commission find TURN's participation costs are reasonable, considering the benefits to both LifeLine subscribers and surcharge payers.	
b. Reasonableness of hours claimed: TURN's attorneys and advocates recorded a reasonable number of hours for their work in this proceeding. The total hours of professional time included in this compensation request (approximately 297 hours of substantive work, exclusive of compensation-related work) is equivalent to more than six and a half weeks of full-time work by a single person. TURN's efforts covered work on the portions of our work on the November 2023 SSA and MSS Staff Proposal; portions of work responding to the 2022 Program Assessment; reply comments on the June 2024 ALJ Ruling regarding the SSA freeze; opening comments on the Proposed Decision freezing the SSA; a petition for modification that assisted in laying the foundation for the Home Broadband Pilot; two sets of opening and comments on the Home Broadband Pilot; a response to YLC's Petition for modification and two sets of opening and reply comments on modifications to the Foster Youth Pilot; and a set of opening and reply comments on revisions to GO 153. TURN extensively reviewed its claimed hours for this proceeding and withheld hours spent on work that is arguably compensable. This cut time includes internal and external coordination, time spent reviewing other parties' filings, and time spent on drafting intervenor compensation-related filings. The hours that TURN includes in this claim have a clear connection to TURN's substantial contribution to this docket. TURN seeks compensation for approximately 165 hours that Ashley L. Salas devoted to substantive issues in this proceeding. Until October 2025, Ms. Salas was TURN's lead attorney on California LifeLine issues except for the Foster Youth Pilot. During this period, Ms. Salas led all other aspects of TURN's work covered in this claim, including the development of TURN's strategy, drafting of pleadings, and communication and coordination with other parties. TURN seeks compensation for approximately 151.25 hours that Alexandra Green devoted to substantive issues in this proceeding. Until October 2025,	After the adjustments made to this claim, the remainder of the claimed hours are reasonable. *See* Part III.D [1].

	CPUC Discussion
Ms. Green was TURN's lead attorney on all matters and strategy related to the Foster Youth Pilot and assisted Ms. Salas with research, the drafting of TURN's filings, and the review of other parties' filings. After October 2025, Ms. Green became TURN's lead attorney on all California LifeLine issues and led TURN's strategy and issue development, the drafting of all pleadings, and coordination with other parties on other issues in addition to her ongoing work with the Foster Youth Pilot. TURN seeks compensation for approximately 3 hours that Leo Fitzpatrick devoted to substantive issues in this proceeding. Mr. Fitzpatrick assisted Ms. Salas in negotiating NDAs with LifeLine service providers to obtain information that TURN sought to use to inform its recommendations on LifeLine SSA and MSS. TURN seeks compensation for approximately 1.75 hours that Brenda D. Villanueva devoted to substantive issues in this proceeding. Mrs. Villanueva was TURN's Telecommunications Managing Attorney from the beginning of the period covered in this claim until late June 2023 and again from January 2024 to July 2024. As managing attorney, Mrs. Villanueva assisted Ms. Salas and Ms. Green with strategy development, coordination with other parties, and revisions to TURN filings. TURN seeks compensation for approximately 2 hours that Christine Mailloux devoted to substantive issues in this proceeding. Ms. Mailloux served as interim Telecommunications Managing Attorney from July 2024 to January 2025 and during that period drew upon her extensive experience in California LifeLine matters to review draft filings and work with Ms. Salas and Ms. Green on strategy development on the LifeLine issues where they were the respective leads. TURN seeks compensation for approximately 1 hour that Thomas Long devoted to substantive issues in this proceeding. Mr. Long served as interim Telecommunications Managing Attorney from January 2025 to June 2025. During this period, he consulted on strategy matters with Ms. Green regarding the Foster Youth Pilot and provided feedback on related pleadings. TURN seeks compensation for approximately 1.25 hours that Robert Finkelstein devoted to substantive issues in this proceeding. Mr. Finkelstein served as interim Telecommunications Managing Attorney from June 2025 to September 2025. During this period, Mr. Finkelstein worked with Ms. Green with strategy development on Foster Youth Pilot matters and provided feedback on related pleadings.	

	CPUC Discussion
TURN seeks compensation for approximately 1.5 hours that Kori Cordero devoted to substantive issues in this proceeding. Mx. Cordero became Telecommunications Managing Attorney in late September 2025. During the period covered by this claim, Mx. Cordero provided review and feedback on TURN's draft comments on the Commission's proposed revisions to GO 153. **SSA-, MSS- and Program Assessment-Related Work** In this claim, TURN seeks compensation for hours spent on work related to the California LifeLine SSA, MSS, and recommendations stemming from the 2022 Program Assessment, coded as SSA_MSS_WLESS, SSA_MSS_WLINE, SSA_SP, PRGASSESS, and approximately half of the hours coded as FED. The Commission did not issue final decisions on these issues before it closed R.20-02-008 and opened R.25-11-005, where these issues are already being examined or are preliminarily scoped. If the Commission does not find TURN's claim for all hours in this proceeding to reasonably lead to a substantial contribution in R.20-02-008, TURN requests that the Commission not reject this compensation request out of hand or significantly reduce the hours eligible for compensation. Instead, TURN requests leave to submit claims for these hours in the new LifeLine Rulemaking, R.25-11-005. This category of hours *does not* include work on usage data analysis or recommendations for the MSS for the Foster Youth Pilot. TURN was awarded compensation for that work in D.24-11-020. **Recurring LifeLine Stakeholder Meetings** This compensation request includes claims for TURN's participation in two types of recurring meetings: monthly meetings between the California LifeLine third-party administrator (TPA) and consumer advocates, and recurring meetings between TURN, YLC, the TPA, and Commission staff regarding the Foster Youth Pilot. As is often the case with LifeLine matters, these meetings are examples of instances where Commission staff, the TPA, and stakeholders exchanged information and discussed issues and implementation of Commission decisions informally. TURN used these meetings as an opportunity to ask clarifying questions and gather information used in our filings to support TURN's	

	CPUC Discussion
recommendations and supplement the record.[11] TURN is not claiming all of these meetings or the entire duration of the meetings included in this claim but limiting is limiting claims to meetings that directly informed TURN's participation in the matters represented in this compensation claiming. **Meetings or Discussions Involving Multiple TURN Advocates** A relatively small percentage of hours and hourly entries reflect internal and external meetings involving two or more of TURN's advocates or attorneys. In past compensation decisions, the Commission has deemed such entries as reflecting internal duplication that is not eligible for an award of intervenor compensation. This is not the case here. For the meetings that were among TURN's advocates and attorneys, such meetings are essential to the effective development and implementation of TURN's strategy for R.20-02-008. None of the attendees are there in a duplicative role – each is an active participant, bringing their particular knowledge and expertise to bear on the discussions. As a result, TURN can identify issues and angles that would almost certainly never come to mind but for the collaboration achievable in such settings. There were also meetings with other parties at which TURN was represented by more than one advocate on occasion. The Commission should understand that this is often essential in LifeLine work, which represents a wide range of complex and detailed issues that no single person is likely to master. TURN's requested hours do not include any entries for TURN advocates where their presence at a meeting was not necessary to achieve the meeting's purpose. TURN submits that such meetings can be part of an intervenor's effective advocacy before the Commission, and that intervenor compensation can and should be awarded for the time of all participants in such meetings where, as here, each participant needed to be in the meeting to advance the intervenor's advocacy efforts. For both internal and external meetings, TURN advocates on occasion did not stay for the entire meeting because of a schedule conflict. In past compensation decisions, the Commission has	

[11] *See, e.g.,* TURN Broadband Report Opening Comments at p. 19 ("TURN recommends that the Commission iterate on the LifeLine customer portal it is developing for the general California LifeLine program to create a dedicated customer portal for a broadband pilot. Pilot subscribers should be able to register with the portal, apply for the pilot, and then select a participating provider."); TURN PFM Staff Proposal Reply Comments at pp. 3-4; Reply Comments of TURN on the Proposed Decision Modifying Decision 24-05-003 (Oct. 6, 2025), at p. 1 ("It is TURN's understanding that under the current Pilot processes, if a caregiver does not support a foster youth's Pilot application or refuses to provide their signature, the application proceeds anyway—in keeping with foster youth's right to access technology and the internet. Therefore, a caregiver signature or lack thereof has no practical effect." (internal citations omitted)).

<table>
<tr><th></th><th>CPUC Discussion</th></tr>
<tr><td>deemed such discrepancies in time entries as grounds to reduce all advocates’ time for such meetings. This is not the case here. TURN submits that any time difference listed for internal or external meeting reflects the fact that an advocate could not stay for the entire length of the meeting due to a schedule conflict, which resulted in an advocate arriving late to a meeting or leaving early.

<u>Intervenor Compensation-Related Time</u>
TURN is requesting compensation for 29.75 hours that it devoted to the substantial preparation of this request for compensation. This is a reasonable number of hours given the size and scope of this request due to the number of final decisions represented in this claim and TURN’s participation in their development. Moreover, TURN has voluntarily reduced a significant number of hours claimed for preparing a compensation request of this magnitude. In sum, the Commission should find that the number of hours claimed is entirely reasonable in light of the substantial contributions TURN made in R.20-02-008.</td><td></td></tr>
<tr><td>c. Allocation of hours by issue:
<table>
<tr><td>ACP_Pilot</td><td>ACP Pilot – research and advocacy related to the wind-down of the ACP pilot and compliance with D.23-06-003</td><td>1.18%</td></tr>
<tr><td>AEVS</td><td>Medi-Cal Automated Eligibility Verification System – Information-gathering related to the LifeLine program’s data sharing with Medi-Cal for subscriber eligibility verification and renewals</td><td>0.59%</td></tr>
<tr><td>CUSTPORT</td><td>LifeLine Customer Portal – Information-gathering related to the development of the online customer portals for LifeLine and Foster Youth Pilot subscribers</td><td>1.18%</td></tr>
<tr><td>FED</td><td>Federal Lifeline Subsidy – work, research, and advocacy regarding California LifeLine’s alignment with the federal program to maximize eligibility for federal funding where possible and to make up for lost federal funding where needed to prevent second class service for subscribers.</td><td>3.03%</td></tr>
</table></td><td>Noted. The percentages do not add up to 100.00% due to rounding.</td></tr>
</table>

			CPUC Discussion
FYP_APP	**Foster Youth Pilot: Applications** – Advocacy, work, and information-gathering related to proposed changes to the Foster Youth Pilot application process, including changes to the process for requesting replacement devices, and monitoring of the application process.	1.35%	
FYP_ELIG	**Foster Youth Pilot: Eligibility** – work and advocacy related to proposed changes to Foster Youth Pilot eligibility, eligibility documentation, and support for foster youth being able to transition to the main California LifeLine program when they become eligible at 18. Includes work/advocacy in support of database matching agreement to automate applicant eligibility verification.	3.28%	
FYP NON-USAGE	**Foster Youth Pilot: Non-Usage** – Analysis, advocacy, and information-gathering to support TURN's recommendations regarding the implementation of a non-usage policy for the Foster Youth Pilot	1.94%	
FYP_PFM	**Foster Youth Pilot: YLC Petition for Modification** – Work on TURN's response to YLC's Petition for Modification of D.24-05-003 that cannot be allocated to a more specific category.	0.42%	
FYP_PFMSP	**Foster Youth Pilot: PFM Staff Proposal** – Work on comments on the PFM Staff Proposal that cannot be allocated to a more specific category.	0.51%	
FYP_TRANSITION	**Foster Youth Program: Transition** – work, advocacy, and information gathering related to the transition from the iFoster Pilot to the Foster Youth Pilot that cannot be allocated to a more specific category.	3.54%	
FZ_AMT	**SSA Freeze: Amount** – Analysis and advocacy related to determining the amount at which to freeze the LifeLine SSA.	0.34%	

			CPUC Discussion
FZ_GO153	**SSA Freeze: GO 153** – Work and advocacy regarding modifications to GO 153 to implement the SSA freeze.	0.42%	
FZ_SUNST	**SSA Freeze: Sunset** – Analysis and advocacy related to determining the sunset date for the SSA freeze	0.42%	
FZ_WLESS/ WLINE	**SSA Freeze: Wireless versus Wireline** – Analysis and advocacy regarding different treatment of the wireless and wireline SSAs.	0.76%	
GO153_APP	**General Order 153:** – Work related to recommended modifications to GO 153 regarding the Commission's proposed modification to the term	0.34%	
GO153_LIN KS	**General Order 153: Hyperlinks** – Work related to recommended modifications to GO 153 regarding hyperlinks included in proposed redlines.	0.17%	
GO153_PD	**General Order 153: Proposed Decision** – Work related to recommended modifications to GO 153 that cannot be allocated to a more specific category.	0.51%	
GO153_SSN	**General Order 153: Social Security Numbers** – Work related to recommended modifications to GO 153 regarding language requiring Social Security Numbers.	0.42%	
GO153_SUP	**General Order 153: Decisions Superseding D.22-10-021** – Work related to recommended modifications to GO 153 regarding the Commission's surcharge authority.	0.25%	
GO153_VOI P	**General Order 153: VoIP Issues** – Work related to recommended modifications to GO 153 regarding VoIP providers and their operating authority.	1.09%	
LLBBAND_ DATA	**LifeLine Support for Standalone Broadband: Data** – work and advocacy related to determining data reporting requirements for service providers offering LifeLine-supported standalone broadband.	1.60%	

			CPUC Discussion
LLBBAND_ DUR	**LifeLine Support for Standalone Broadband: Duration** – Analysis and advocacy regarding the duration of LifeLine support for standalone broadband.	2.61%	
LLBBAND_ ELIG	**LifeLine Support for Standalone Broadband: Eligibility** – research and advocacy regarding consumer eligibility criteria for LifeLine-supported standalone broadband.	0.84%	
LLBBAND_ MSS	**LifeLine Support for Standalone Broadband: MSS** – research and advocacy regarding the MSS for LifeLine-supported standalone broadband.	4.88%	
LLBBAND_ PD	**LifeLine Support for Standalone Broadband: Proposed Decision** – Work on comments on the Home Broadband Pilot proposed decision that cannot be allocated to a more specific category.	1.26%	
LLBBAND_ PFM	**LifeLine Support for Standalone Broadband** – TURN/Cal Advocates Petition for Modification – Work on the Petition for Modification of D.20-10-006 and TURN's reply to other parties' responses to that Petition that cannot be allocated to a more specific category. This code includes ex parte work in support of the Petition.	3.70%	
LLBBAND_ PILOT	**LifeLine Support for Standalone Broadband: Home Broadband Pilot** – Work, research, and advocacy in support of the CPUC enacting a broadband pilot subsidy pilot, including addressing related legislative developments and defending the Commission's authority to enact a pilot.	4.29%	
LLBBAND_ PROVIDER	**LifeLine Support for Standalone Broadband: Providers** – includes work and research around the question of whether the Commission could mandate provider participation in a pilot.	3.54%	
LLBBAND_ SCHG	**LifeLine Support for Standalone Broadband: Surcharge** – work and	2.61%	

			CPUC Discussion
	advocacy related to cost and funding issues related to LifeLine support of standalone broadband, including potential impact on the Public Purpose Program surcharge.		
LLBBAND_SP	**LifeLine Support for Standalone Broadband: Staff Proposal** – Work on comments on the Home Broadband Adoption Report that cannot be allocated to a more specific category.	2.1%	
LLBBAND_SSA	**LifeLine Support for Standalone Broadband: SSA** – Work and advocacy regarding the appropriate monthly subsidy amount for standalone broadband service	2.02%	
MSS	**LifeLine Minimum Service Standards** – Work generally defending California LifeLine minimum service standards, as opposed to allowing LifeLine to become a discount on retail plans	2.36%	
PRGASSESS	**Program Assessment** – Work on comments on the LifeLine Program Assessment that cannot be allocated to a more specific category.	0.67%	
SSA_AFFORD	**SSA Affordability** – work, advocacy, and analysis related to keeping co-payments affordable for LifeLine subscribers	3.37%	
SSA_MSS_WLESS	**Wireline SSA & MSS** – work, advocacy, and data analysis regarding the SSA and MSS for wireline LifeLine service. Includes related discovery work, including related data requests to wireline providers.	22.9%	
SSA_MSS_WLINE	**Wireless SSA & MSS** – work, advocacy, and data analysis regarding wireless LifeLine service. Includes related discovery work, including data requests to wireless providers.	8.08%	
SSA_SP	**SSA & MSS Staff Proposal** – Work on comments on the November 2023 SSA and MSS Staff Proposal that cannot be allocated to a more specific category.	5.3%	
TRIBAL	**Tribal Participation** – outreach to Tribal contacts, work, and advocacy on measures to encourage Tribal participation in the	2.61%	

			CPUC Discussion
	California LifeLine program and Home Broadband Pilot.		
Coord	**Coordination** – time spent strategizing, coordinating, and communicating with other organizations that cannot easily be allocated to a specific issue.	3.54%	
TOTAL		**100%**	

B. Specific Claim:*

Claimed						CPUC Award		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Ashley Salas, TURN Attorney	2022	15.5	$415	D.23-04-020	$6,432.50	13.00 [1]	$415.00	$5,395.00
Ashley Salas, TURN Attorney	2023	6.5	$455	D.24-09-018	$2,975.50	0.50 [1]	$455.00	$227.50
Ashley Salas, TURN Attorney	2024	106.5	$475	D.24-09-018	$50,587.50	38.50 [1]	$475.00	$18,287.50
Ashley Salas, TURN Attorney	2025	36	$515	D.25-07-029	$18,540.00	36.00	$515.00	$18,540.00
Alexandra Green, TURN Attorney	2023	2.5	$220	D.24-09-018	$550.00	0.50 [1]	$220.00	$110.00
Alexandra Green, TURN Attorney	2024	57.5	$240	D.24-09-018	$13,800.00	24.25 [1]	$240.00	$5,820.00

CLAIMED						CPUC AWARD		
Alexandra Green, TURN Attorney	2025	62	$275	D.25-05-025	$17,050.00	62.00	$275.00	$17,050.00
Leo Fitzpatrick, TURN Telecom. Policy Analyst	2024	3	$325	D.25-01-024	$975.00	0.00 [1]	$325.00	$0.00
Brenda D. Villanueva, TURN Telecom. Managing Attorney	2024	1.75	$505	D.24-11-020	$883.75	1.50 [1]	$505.00	$757.50
Christine Mailloux, TURN Telecom. Managing Attorney	2024	2	$770	D.25-01-052	$1,540.00	2.00	$770.00	$1,540.00
Thomas Long, TURN Director of Legal Strategy & Interim Telecom. Managing Attorney	2025	1	$885	Res. ALJ-393, 2024 Rate plus 3.46% COLA (See Comment 1)	$885.00	1.00	$880.00 [2]	$880.00
Robert Finkelstein, TURN General Counsel & Interim Telecom. Managing Attorney	2025	1.25	$905	Res. ALJ-393, 2024 rate plus 3.46% COLA (See Comment 2)	$1,131.25	1.25	$905.00 [3]	$1,131.25

CLAIMED						CPUC AWARD		
Kori Cordero, TURN Telecom. Managing Attorney	2025	1.5	$500	Res. ALJ-393 (See Comment 3).	$750.00	1.50	$430.00 [4]	$645.00
					Subtotal: $ 116,082.50			***Subtotal:* $70,383.75**
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Ashley Salas, TURN Attorney	2025	.5	$257.50	Half of 2025 rate.	$128.75	0.50	$257.50	$128.75
Alexandra Green, TURN Attorney	2025	24.25	$137.50	Half of 2025 rate.	$3,334.38	24.25	$137.50	$3,334.38
Alexandra Green, TURN Attorney	2026	5	$150.00	Half of 2026 requested rate (See Comment 4).	$750.00	5.00	$150.00 [5]	$750.00
					Subtotal: $ 4,213.13			***Subtotal: $4,213.13***
					TOTAL REQUEST: $ 120,295.63			***TOTAL AWARD: $74,596.88***

*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

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

CLAIMED				CPUC AWARD
ATTORNEY INFORMATION				
Attorney	**Date Admitted to CA BAR**[12]	**Member Number**	**Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation**	
Ashley L. Salas	December 2015	308374	No	
Alexandra Green	December 2022	346771	No	
Brenda D. Villanueva	January 2021	334217	No	
Christine Mailloux	December 1993	167918	No	
Thomas J. Long	December 1986	124776	No	
Robert Finkelstein	June 1990	146391	No	
Kori Cordero	March 2017[13]	314319	No	

C. Attachments Documenting Specific Claim and Comments on Part III[14]**:**

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Timesheet for TURN's Advocates
Attachment 3	TURN Hours Allocated by Issue
Attachment 4	Commission Notice of Specific Support Calculation for 2025
Attachment 5	LifeLine Active Subscriber Statistics (January 1, 2025)
Attachment 6	Résumé of Kori Cordero
Comment 1	<u>2025 Rate for Thomas J. Long</u> For Mr. Long's work in 2025, TURN requests that the Commission adjust his authorized 2024 rate of $860 (D.24-09-016) by applying the annual escalation adjustment authorized by Resolution ALJ-393 for 2025 of 3.46%. TURN uses a 2025 rate of $885 to prepare this claim.

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

[13] Comment 3 indicates Cordero was admitted to Pascua Yaqui Bar in 2013 and Yurok Tribal Bar subsequent to the CA Bar. The Pascua Yaqui Bar website indicates that the certification is expired (*See* View Profile – Pascua Yaqui Bar). The Yurok Tribal Bar website does not list Cordero (*See* Bar Members – Yurok Tribal Court).

[14] Attachments not attached to the final decision.

Attachment or Comment #	Description/Comment
Comment 2	<u>2025 Rate for Robert Finkelstein</u> TURN requests an hourly rate of $905 for work conducted by TURN General Counsel Robert Finkelstein in 2025. The requested rate is equal to the rate authorized by the Commission in D.24-07-033 for Mr. Finkelstein's work in 2024, $875, adjusted by the 2025 escalation rate of 3.46%. Calculation: $875 x [1.0346 (COLA)] = $905.28, rounded to $905.
Comment 3	<u>2025 Rate for Kori Cordero</u> This is TURN's first request for an hourly rate for TURN Telecom Advocacy Managing Attorney Kori Cordero. TURN accordingly presents the full justification required by Resolution ALJ-393 for a new market rate for Mx. Cordero and provides Mx. Cordero's resume as Attachment 6 to this claim. **Intervenor Representative:** Kori Cordero **Labor Role:** Legal - Attorney **Level:** III **2025 Hourly Rate Range:** $376.79 - $586.51 **Requested Hourly Rate:** $500 **Current Resume:** See Attachment 6. **Justification for the Requested Hourly Rate:** Kori Cordero is an attorney with more than a decade of law and policy experience, primarily focused on Tribal matters, including but not limited to telecommunications, energy, and environmental issues impacting Tribes. They received their JD from UCLA School of Law in 2014 and Bachelor of Arts in Political Science from UC Riverside in 2010. Mx. Cordero was admitted to the Pascua Yaqui Bar in 2013, the California Bar in March 2017, and subsequently, the Yurok Tribal Bar. In September 2025, Mx. Cordero joined TURN as TURN's Telecom Advocacy Managing Attorney, where they represent TURN in telecommunications proceedings before the Commission and oversee TURN's telecommunications regulatory practice. Mx. Cordero arrived at TURN with significant expertise around utility regulatory and environmental issues. Mx. Cordero's prior experience encompassed, in pertinent part, providing legal advice to tribal governments and tribal corporations related to the California Environmental Quality Act, energy projects, utility rights of way, utility company land transactions and negotiations with utility entities; advising the U.S. Environmental

Attachment or Comment #	Description/Comment
	Protection Agency on Tribal issues; serving as Associate and Deputy General Counsel for the Yurok Tribe and outside counsel for several Yurok Tribal owned corporations, including the Yurok Telecommunications Corporation, and even a short stint as the Chief Executive Officer of Yurok Telecommunications Corporation. When Mx. Cordero joined TURN in September 2025, Mx. Cordero had been licensed by the California bar for 8 ½ years. The Market Rate Study Hourly Rate Chart, as clarified by Resolution ALJ-393, instructs that an Attorney in Level III should have a JD or equivalent degree, 5-10 years of experience, and be licensed to practice law by any jurisdiction within the United States. The Hourly Rate Chart further suggests, "Higher experience levels should have experience with areas of law and procedures relevant to CPUC matters, such as environmental law or utility regulation." Mx. Cordero satisfies all of these requirements. They are an experienced litigator with specific knowledge of utility regulation, telecommunications law and policy issues, and energy and environmental issues. Because their employment history has extended beyond those topics most germane to Commission practice, TURN is conservatively requesting a rate only slightly above the midpoint of the market rate range established in Res. ALJ-393 for an Attorney - Level III, which is $480.91 for 2025. TURN submits that the requested rate of $500 is reasonable for Mx. Cordero's work in 2025.
Comment 4	<u>2026 Rate for Alexandra Green</u> TURN requests an hourly rate of $300 for TURN Attorney Alexandra Green in 2026. The requested rate is equal to the rate authorized by the Commission in D.25-05-025 for Ms. Green's work in 2025, $275, adjusted by both (1) an estimated escalation rate of 3.3% for 2026, and (2) the first 5% step increase in the Attorney – Level II experience tier. Calculation: $275 x [1.033 (est. COLA) + 0.05 (step increase)] = $297.83, rounded to $300 TURN uses an estimated escalation rate of 3.3% because it is the percentage change in the Bureau of Labor Statistics Employment Cost Index (ECI), Table 5, for the Occupational Group "Management, Professional, and Related excluding Incentive Paid Occupations" for the 12-months ended Sept. 2025, which is the latest information available to TURN. TURN asks

Attachment or Comment #	Description/Comment
	the Commission to apply the adopted escalation rate in determining Ms. Green's 2026 hourly rate. Res. ALJ-393 permits intervenor representatives to claim up to two 5% annual "step increases" within each labor role experience tier, as long as their final requested rate does not exceed the maximum approved rate for that experience level. (Res. ALJ-393, p. 5). The maximum approved rate for an Attorney – Level II is $453.79 for work conducted in 2025. The requested 2026 rate for Alexandra Green of $300 is well below the cap.

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Reductions - Denied without Prejudice	Public Utilities Code § 1802(j) states that a substantial contribution "has substantially assisted the commission in the making of its order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer." As explained by TURN in Part II.A, they seek compensation for hours spent on work related to the California LifeLine SSA, MSS, and recommendations stemming from the 2022 Program Assessment, coded as SSA_MSS_WLESS, SSA_MSS_WLINE, SSA_SP, PRGASSESS, and approximately half of the hours coded as FED. The Commission did not issue a decision on these issues before closing Rulemaking (R.) 20-02-008 and opening R.25-11-005, where these issues are already being examined and/or are preliminarily scoped. Therefore, all hours marked as SSA_MSS_WLESS, SSA_MSS_WLINE, SSA_SP, PRGASSESS, and approximately half of the hours coded as FED[15] in TURN's timesheets are denied without prejudice and may be considered in R.25-11-005 if the hours substantially contribute to the proceeding's resolution of the issues. The hours reduced are broken down as follows: • Salas 2022: 2.50 • Salas 2023: 6.00 • Salas 2024: 68.00 • Green 2023: 2.00

[15] *See* Salas's timesheet entries coded FED: 7/1/2022, 6/8/2023, 1/13/2024, 1/22/2024; Green's timesheet entries coded FED: 1/19/2024, 1/20/2024, 1/23/2024. These timesheet entries are denied without prejudice and may be considered in R.25-11-005.

Item	Reason
	• Green 2024: 33.25 • Fitzpatrick 2024: 3.00 • Villanueva 2024: 0.25
[2] Thomas Long 2025 Hourly Rate	D.26-03-038 verified a 2025 rate of $880.00 for Thomas Long as a Legal – Legal Director – IV. We find this rate to be reasonable and apply it here.
[3] Robert Finkelstein 2025 Hourly Rate	D.26-04-019 verified a 2025 rate of $905.00 for Robert Finkelstein as a Legal – Legal Director – V. We find this rate to be reasonable and apply it here.
[4] Kori Cordero 2025 Hourly Rate	At the time of filing, Cordero had over 5 years of experience and therefore qualifies for Legal – Attorney – III (5-10 years of experience) with a 2025 rate range of $376.79 to $586.51. Based on relevant experience, we find a 2025 hourly rate of $430.00 reasonable and adopt it here.
[5] Alexandra Green 2026 Hourly Rate and 2026 Intervenor Compensation (IComp) Preparation Rate	TURN requests that the Commission apply the 2026 escalation factor and the first of two 5% step increases for Alexandra Green as a Legal – Attorney – II. D.25-05-025 verified a 2025 rate of $275.00 for Alexandra Green as a Legal – Attorney – II. To this rate, we apply the 2026 escalation factor of 3.35% and the first 5.00% step increase (a total of 8.35%) for a 2026 rate of $300.00 (rounded to the nearest $5.00). We take one half of the approved rate for an IComp preparation rate of $150.00 and apply it here.

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

A. Opposition: Did any party oppose the Claim?	No

B. Comment Period: Was the 30-day comment period waived (*see* Rule 14.6(c)(6))?	No

If not:

Party	Comment	CPUC Discussion
	No comments filed.	

FINDINGS OF FACT

1. The Utility Reform Network has made a substantial contribution to Decision (D.) 24-12-006, D.25-06-003, D.25-08-050, D.25-10-025, D.25-11-008, and D.23-06-003.

2. The requested hourly rates for The Utility Reform Network's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.

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

4. The total of reasonable compensation is $74,596.88.

CONCLUSION OF LAW

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

ORDER

1. The Utility Reform Network is awarded $74,596.88.

2. Within 30 days of the effective date of this decision, California Public Utilities Commission shall pay The Utility Reform Network 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 April 8, 2026, the 75th day after the filing of The Utility Reform Network's request, and continuing until full payment is made.

3. The comment period for today's decision is not waived.

4. Rulemaking 20-02-008 is closed.

This decision is effective today.

Dated _____________, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		**Modifies Decision?**	No
Contribution Decision(s):	D2412006, D2506003, D2508050, D2510025, D2511008, and D2306003		
Proceeding(s):	R2002008		
Author:	ALJ Robyn Purchia		
Payer(s):	California Public Utilities Commission		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	01/23/2026	$120,295.63	$74,596.88	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
Ashley	Salas	Attorney	$415	2022	$415.00
Ashley	Salas	Attorney	$455	2023	$455.00
Ashley	Salas	Attorney	$475	2024	$475.00
Ashley	Salas	Attorney	$515	2025	$515.00
Alexandra	Green	Attorney	$220	2023	$220.00
Alexandra	Green	Attorney	$240	2024	$240.00
Alexandra	Green	Attorney	$275	2025	$275.00
Alexandra	Green	Attorney[16]	$300	2026	$300.00
Leo	Fitzpatrick	Advocate	$325	2024	$325.00
Brenda	Villanueva	Attorney	$505	2024	$505.00

[16] The first of two step increases was applied for Alexandra Green as a Legal – Attorney – II.

Christine	Mailloux	Attorney	$770	2024	$770.00
Thomas	Long	Attorney	$885	2025	$880.00
Robert	Finkelstein	Attorney	$905	2025	$905.00
Kori	Cordero	Attorney[17]	$500	2025	$430.00

(END OF APPENDIX)

[17] Kori Cordero is classified as a Legal – Attorney – III for 2025.

Summary report: Litera Compare for Word 11.6.0.100 Document comparison done on 8/12/2026 7:36:31 AM	
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Move To	0
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Embedded Excel	0
Format changes	0
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