Decision 26-08-022 August 13, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Investigate and Design Clean Energy Financing Options for Electricity and Natural Gas Customers	Rulemaking 20-08-022 (Filed August 27, 2020)

DECISION GRANTING COMPENSATION TO CENTER FOR ACCESSIBLE TECHNOLOGY FOR SUBSTANTIAL CONTRIBUTION TO DECISION (D.) 25-12-021

Intervenor: CENTER FOR ACCESSIBLE TECHNOLOGY	**For contribution to Decision (D.)** 25-12-021
Claimed: $63,959.25	**Awarded:** $59,473.50
Assigned Commissioner: John Reynolds[1]	**Assigned ALJ:** Garrett Toy

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	Decision (D.) 25-12-0212[2] authorizes Southern California Edison's proposed Tariff On Bill Financing Pilot proposal, with modifications, and denies the proposals put forth by San Diego Gas & Electric Company, Southern California Gas Company, and Silicon Valley Clean Energy. It also closes the proceeding.

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812[3]:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	2/25/2021	2/5/2021
2. Other specified date for NOI:	Authorized in Amended Scoping Memo issued on 11/19/21, with deadline set for 30	The Amended Scoping Ruling in R.20-08-022, dated 11/19/2021 states, "Given the adjusted

[1] R.20-08-022 has been reassigned to Commissioner John Reynolds from Commissioner Alice Reynolds as of June 30, 2026.

[2] D.25-12-021.

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

	days later (12/19/21). *See* comment below.	scope of issues adopted…parties that have not yet filed and served a notice of intent to claim compensation may do so within 30 days of the issuance of the Amended Scoping Memo.”
3. Date NOI filed:	11/29/2021	Verified
4. Was the NOI timely filed?		Verified
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:	CforAT’s most recent finding of eligible customer status was issued on March 15, 2024 in R.22-11-013. *See also* comment below.	The ruling in R.21-06-017 dated 11/8/2021 created a rebuttable presumption for CforAT in this proceeding.
6. Date of ALJ ruling:	March 15, 2024	The ruling in R.21-06-017 dated 11/8/2021 created a rebuttable presumption for CforAT in this proceeding.
7. Based on another CPUC determination (specify):	CforAT has previously been found eligible and has been awarded compensation in this proceeding. *See* comment below.	Noted
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:	CforAT’s most recent finding of	The ruling in R.21-06-017 dated

	eligible customer status was issued on March 15, 2024 in R.22-11-013. *See also* comment below.	11/8/2021 created a rebuttable presumption for CforAT in this proceeding.
10. Date of ALJ ruling:	March 15, 2024	The ruling in R.21-06-017 dated 11/8/2021 created a rebuttable presumption for CforAT in this proceeding.
11. Based on another CPUC determination (specify):	CforAT has previously been found eligible and has been awarded compensation in this proceeding. *See* comment below.	Noted
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.25-12-021	Verified
14. Date of issuance of Final Order or Decision:	12/23/2025	Verified
15. File date of compensation request:	2/13/26	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
	"A party found eligible for an award of compensation in one phase of a proceeding remains eligible in later phases, including any rehearing, in the same proceeding." Rule 17.2, CPUC Rules of Practice and Procedure. CforAT has previously been awarded compensation for work in this proceeding, specifically for our contributions to D.23-08-	Noted; the ruling in R.21-06-017 dated 11/8/2021 created a rebuttable presumption for CforAT in this proceeding.

#	Intervenor's Comment(s)	CPUC Discussion
	026. *See* D.24-12-068. Accordingly, CforAT is eligible for an award of compensation in this phase of the proceeding.	

PART II: SUBSTANTIAL CONTRIBUTION

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

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
Overview: In the previous phase of this proceeding, the Commission considered a number of clean energy financing proposals, informed by the input of numerous stakeholders including CforAT (generally working in conjunction with NCLC). In D.23-08-026, issued in this proceeding on August 18, 2023, the Commission declined to adopt any of the residential proposals at that time and directed the IOUs, as well as other interested parties, to file a Joint Tariff On-Bill (TOB) Proposal in the next phase of the proceeding. This decision also directed the formation of a TOB Working Group and Equity Committee to discuss customer protections, equity concerns, and other outstanding issues highlighted in D.23-08-026. The Working Group and Equity Committee were subsequently formed and engaged in a series of meetings	The Final Decision on the Tariff On-Bill Pilot Proposals, D.25-12-021, is broadly consistent with the recommendations of CforAT and the other consumer advocates, noting important concerns about vulnerable customer groups and approving only one limited pilot proposal, conditional on the input of a separate state agency (DFPI) on the status of the financing element of the proposal. CforAT's direct contributions to the Final Decision are set out in detail below.	Noted

addressing numerous issues surrounding residential TOB. CforAT was an active participant in the Equity Committee, including efforts to more fully integrate the Equity Committee with the Working Group. Subsequently, the IOUs and SVCE jointly submitted TOB pilot proposals which were recognized as being informed by the input of the Working Group and Equity Committee. Because no clear pathway was provided for review of the proposals, CforAT (in conjunction with NCLC and TURN) filed a motion requesting procedural guidance on how the Commission would seek input. Subsequently, the Commission sought party comments on both the proposals and a third-party assessment of the proposals conducted by a consultant retained by Energy Division. Based on CforAT's review of the proposals, including the extent to which they met the standards proposed by the Equity Committee, as well as our review of the consultant analysis (the Dunsky Report), CforAT, working jointly with NCLC and other consumer advocates, opposed adoption of the various proposals and made recommendations on key provisions that would need to be addressed as part of any		

reasonable and equitable residential TOB proposal. Along with our active participation in the Equity Committee associated with the TOB Working Group, CforAT's input into this portion of the proceeding included the following filings: CforAT, NCLC and TURN Motion Seeking Procedural Guidance, filed on June 13, 2024; Opening Comments on the ALJ Ruling Seeking Comments on Tariff On-Bill Proposals, filed jointly with NCLC, TURN and NHLP on May 14, 2025; Reply Comments of Center for Accessible Technology, The Utility Reform Network, National Consumer Law Center, and National Housing Law Project on the Administrative Law Judges Ruling seeking comments on Tariff On-Bill Proposals, filed on May 30, 2025; Opening Comments on Proposed Decision, filed jointly with NCLC and NHLP on November 20, 2025; and Reply Comments On the ALJ"s Proposed Decision on Tariff On-Bill Pilot Proposals, filed on November 24, 2025.		
TOB Working Group/Equity Committee:	The Final Decision recognizes that "the Utilities consulted with a TOB Working Group and were advised by an Equity	Verified

Decision 23-08-026 required the creation of a TOB Working Group and "an equity committee within the TOB Working Group" that was established "to focus on customer protection and equity concerns." D.23-08-026 at p. 80. Once convened, CforAT was an active participant in the Equity Committee, including efforts to more fully integrate the Equity Committee with the Working Group, consistent with the requirements of D.23-08-026. While the Working Group refused to fully incorporate the Equity Committee, the Joint TOB Proposals that were developed by the Working Group and filed on May 14, 2024 note the key input from the Equity Committee, with the Proposal stating that "the Equity Committee's input has significantly shaped the Pilot proposals by highlighting the impact of energy costs on the customers and communities that their organizations represent, including low income. The Equity Committee also highlighted research on energy programs around the country and related policies and guidance related to housing and tenant issues. These insights have informed the Working Group process in significant ways and highlight the complexities in energy policy that impacts residential customers,	Committee in designing their TOB Pilots." Final Decision at p. 92, Finding of Fact #9. The participation of the Working Group and Equity Committee was crucial in developing the proposals that were the basis of this phase of the proceeding, essentially constituting the record under review. The participation of CforAT and other stakeholders in this process was foundational to the entire proceeding and appropriate for compensation.	

especially those that are most vulnerable." Joint Proposal (attached to primary filing) at p. 7. The TOB Proposal also incorporates a separate Equity Committee Report, produced by facilitator Common Spark. Proposal at Appendix D. Overall, the input of Equity Committee members, including CforAT, substantially contributed to the development of the TOB proposals and the overall record in the proceeding. These contributions are reflected throughout the Joint TOB Proposal and subsequently in the various discussions in the Final Decision.		
Procedural Motion: While the Joint TOB Proposal and supporting documents set out a number of issues that remained to be resolved and included a number of competing recommendations, there was no mechanism set forth in D.23-08-026 or any subsequent ruling for obtaining stakeholder input on the proposals. Filing jointly as the Equity Advocates, CforAT, NCLC and TURN noted "various concerns about the proposal that has been submitted and request[ed] guidance from the Commission on the appropriate path to put forward their position for consideration." Motion	While the Commission never formally addressed the procedural motion, the ALJ issued a Ruling on April 16, 2025 asking for the parties' input on the proposals as well as the third-party Dunsky Report, noting that the Commission "determined that additional comment is needed from the parties" following review of the Joint Proposals. Ruling at p. 4. It is reasonable to assume that the ALJ considered the procedural motion when deciding to issue the Ruling. Procedural contributions are compensable through the intervenor compensation program. *New Cingular Wireless PCS, LLC v. Pub. Utils. Comm'n*, 21 Cal.App.5th 1197, 1203; 231 Cal. Rptr. 3d 91 (Cal. Ct. App. 2018).	As CforAT mentions here, the Commission did not formally address CforAT's procedural motion filed on May 29, 2024. The Ruling dated April 16, 2025 cites "After reviewing the submitted TOB proposals…" and "Parties shall consider the Joint TOB Proposals filed on May 14, 2024 in this proceeding as well as the attached Dunsky Report (Joint Tariff On-Bill Proposal Assessment)" as

Seeking Procedural Guidance at p. 1.		reasons why additional comment is needed from parties. CforAT's procedural motion is not cited as a reason for party comment in the Ruling and cannot be assumed to be a factor when deciding to issue the Ruling. As such, CforAT did not make a substantial contribution here to D.25-12-021. *See* Part III.D CPUC Comments, Disallowances, and Adjustments [2].
Review of Proposals: CforAT, in conjunction with other consumer advocates, provided detailed input on the various proposals and on the analysis provided in the Dunsky Report, broadly opposing the adoption of the pilots as proposed and questioning the recommendations of the consultant. Comments on TOB Proposals at pp. 3-4. • CforAT and the other consumer advocates opposed the recommendation in the Dunsky Report to open pilots to low and moderate	The recommendations of CforAT, as part of the Joint Consumer Advocates, are summarized in the Final Decision at pp. 54-56. The overall decision is broadly consistent with the recommendations of the consumer advocates in that it authorizes only one small-scale pilot, with modifications, and it includes most of the protections recommended by consumers. Specific provisions of the Final Decision in which the Commission agreed with most of the recommendations from the consumer advocates are identified below: • In authorizing a modified pilot program for SCE, the Final Decision declines to include low-income customers. Final Decision at p. 77.	Verified

income (LMI) customers. Comments on TOB Proposals at p. 8. • CforAT and the other consumer advocates opposed the recommendation in the Dunsky Report to remove requirements for bill neutrality. Comments on TOB Proposals at pp. 8-11.	 • In authorizing a modified pilot program for SCE, the Final Decision reiterates the requirement for bill neutrality. Final Decision at pp. 75, 79 (limiting charge to 90% of projected bill savings), and p. 93, FOF 19.	
• CforAT and the other consumer advocates disagreed with the Dunsky Report's assertion that issues regarding transferability of TOB to a successor occupant were fully addressed. Comments on TOB Proposals at pp. 12-13.	• In authorizing a modified pilot program for SCE, the Final Decision further addresses concerns about transferability and requires SCE to provide educational materials to subsequent tenants. It also directs SCE to include customer disconnection and partial payment provisions in its TOB Tariff. Final Decision at pp. 77-78.	
• CforAT and the other consumer advocates disagreed with the pilot proponents on whether TOB products are loans. Comments on TOB Proposals at pp. 13-18.	• In authorizing a modified pilot program for SCE, the Final Decision directed SCE to engage with DFPI on whether the pilot qualifies as a lending and/or debt program and allows SCE to cancel the approved pilot if it is determined to be subject to additional regulation. Final Decision at pp. 80-81.	
• CforAT and the other consumer advocates opposed the recommendation in the Dunsky Report that contractors be allowed to market any authorized pilot program. Comments on TOB Proposals at pp. 19-21.	• In authorizing a modified pilot program for SCE, the Final Decision declines to allow marketing by contractors, citing concerns provided by the consumer advocates based on past experience with the PACE program. Final Decision at pp. 81-82.	

• CforAT and the other consumer advocates challenged the affordability and bill impact of the proposed pilots, including concerns about large co-payments. Comments on TOB Proposals at pp. 6-8, 11-12, 22-23.	• In authorizing a modified pilot program for SCE, the Final Decision allows "for the possibility of co-pays" but highlights the option of allowing a co-pay to come from a landlord. Final Decision at p. 75.	
• CforAT and the other consumer advocates specifically opposed adoption of the SoCalGas pilot proposal because it would either provide an incentive to retain customers on the fossil gas system or else it would not provide useful learnings as a pilot. Comments on TOB Proposals at pp. 5, 26; Reply Comments on TOB Proposals at pp. 2-3.	• The Final Decision "agree[s] with intervenors that it would not be fruitful to approve the SoCalGas Pilot at this time." Final Decision at p. 72.	
• CforAT and the other consumer advocates argued that the proposed pilot costs were not reasonable. Comments on TOB Proposals at pp. 29-31.	• The Final Decision acknowledges that multiple parties, including the consumer advocates, opposed adoption of any pilot based on affordability concerns and associated administration and implementation costs. Final Decision at p. 69. It also determines that there are potential benefits, and thus approved a single modified pilot as a way to test the concept while remaining "wary of unnecessary spending of ratepayer funds." Final Decision at pp. 74-75.	
• CforAT and the other consumer advocates opposed SVCE's request for cost recovery. Reply Comments on TOB Proposals at pp. 5-7.	• The Final Decision denies SVCE's request for cost recovery for multiple reasons, including agreement with the consumer advocates that SVCE's request for cost recovery would be retroactive	

	ratemaking. Final Decision at pp. 72-73.	
Following the release of a proposed decision, CforAT and the other consumer advocates provided additional input that was largely adopted in the Final Decision.	Revisions to the PD reflect approval of the input from CforAT and the other consumer advocates as follows:	
• CforAT and the other consumer advocates supported the requirement for SCE to consult with DFPI on whether the modified pilot is a lending program. Comments on PD at pp. 1-3.	• Revisions to the PD add specificity about the process for consulting with DPFI and authorize SCE to cancel the pilot if it is determined that the pilot is not exempt. PD Rev. 1 (Redline) at pp. 81-82.	
• CforAT and the other consumer advocates corrected the PD's characterization of Section 8375. Comments on PD at pp. 3-6.	• Revisions to the PD correct the reference to the statute. PD Rev. 1 (Redline) at p. 8; *see also id.* at p. 74.	
• CforAT and the other consumer advocates opposed recommendations by other parties to make terminology changes to try to avoid DFPI jurisdiction. Reply Comments on PD at pp. 1-4.	• Revisions to the PD specifically decline to adopt proposed changes in terminology. PD Rev. 1 (Redline) at p. 91.	

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?	Cal Advocates is listed as a party but only participated on a limited basis	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: National Consumer Law Center (NCLC), TURN, National Housing Law Project (NHLP): CforAT and NCLC worked closely together throughout this proceeding and jointly in coalition with the other consumer advocates on the responses to the TOB proposals. CforAT and the other consumer advocates held similar positions to other parties, including at times the IOUs, on various elements of the TOB proposals, even if those positions were reached based on different priorities and forms of analysis. For example, the IOUs shared many of the same concerns as the consumer advocates regarding the recommendations of the Dunsky Report.		Noted
d. Intervenor's claim of non-duplication: At all times in this proceeding, CforAT worked in close coalition with NCLC, an organization that has substantial expertise on TOB financing considerations throughout the country. CforAT and NCLC worked efficiently together, each applying their focus to their separate areas of expertise, as they did in earlier phases of this proceeding. CforAT and NCLC also worked jointly with TURN and NHLP to advocate for consumer protections in consideration of residential TOB pilots. In our coordinated efforts with other consumer advocates, the organizations worked jointly to allocate tasks and coordinate drafting efforts, with particular tasks assigned to the organization that had the most knowledge on the topic. For example, CforAT continued to retain procedural oversight of most joint filings, while NCLC continued to bring their expertise on the experiences of other states, and NHLP brought expertise on working with DFPI. These coordinated filings were more effective and efficient than the development of separate comments by each of the consumer organizations.		Noted; *See* Part III.D CPUC Comments, Disallowances, and Adjustments [2].

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: This proceeding is looking to advance California's clean energy goals by considering opportunities for utility customers to finance energy upgrades; while laudable, the expansion of on-bill financing to residential customers presents risks, particularly for low-income customers. CforAT's participation in this phase of the proceeding has been focused on ensuring that residential customers in general, and low-income customers in particular, are not placed at risk based on programs that require them to take on payment obligations for energy upgrades that may not result in lower bills. The impacts of CforAT's efforts on any individual customer are hard to quantify. However, CforAT's overall efforts to ensure that residential TOB pilot programs are reasonable and to reduce the risk that efforts to advance clean energy goals result in bills that are unaffordable or increase customer risks of service disconnection, provide value for the constituency we represent. In light of the importance of these benefits, CforAT's request for intervenor compensation is reasonable.	Noted; *See* Part III.D CPUC Comments, Disallowances, and Adjustments [2].
b. Reasonableness of hours claimed: CforAT worked efficiently and reasonably in all efforts expended in this docket. As noted above, CforAT appropriately worked with other consumer advocates throughout this phase of the proceeding to efficiently and effectively provide joint input as appropriate. This coordination was more efficient than filing separate comments on all issues. Within CforAT, all work was conducted by Melissa Kasnitz, CforAT's Legal Director, who has substantial experience addressing energy issues and programs as they impact CforAT's constituency of residential utility customers with disabilities and medical needs. Ms. Kasnitz was able to work effectively and efficiently with representatives of the other consumer advocate organizations.	Noted; *See* Part III.D CPUC Comments, Disallowances, and Adjustments [2].
c. Allocation of hours by issue: **Kasnitz Hours – 2023 (10.3 hours total)** **General Participation: 0.5 hours (5%)**	Noted; totals 100%

	CPUC Discussion
The issue area "General Participation" includes time spent on procedural matters, review of advice letters and other materials, and time spent on activities that do not fall into the other issue categories. **Working Group: 9.8 hours (95%)** The issue area "Working Group" includes time spent participating with the Working Group and associated Equity Committee in developing parameters for the eventual TOB Proposals. **Kasnitz Hours – 2024 (33.6 hours total)** **General Participation: 1.7 hours (5%)** **Proposal: 16.1 hours (48%)** The issue area "Proposal" includes review of the Joint TOB Proposals, coordination with other consumer advocates in response to the Joint TOB Proposals, work on the procedural motion seeking an opportunity to provide input on the Joint TOB Proposals and otherwise conducting analysis and preparing comments in response to the proposals. **Working Group: 15.8 hours (47%)** **Kasnitz Hours – 2025 (36.8 hours total)** **General Participation: 4.2 hours (11%)** **PD: 8.4 hours (23%)** The issue area "PD" includes time spent responding to the Proposed Decision, including time coordinating with other consumer advocates regarding our joint responses. **Proposal: 24.2 hours (66%)**	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Melissa W. Kasnitz	2023	10.3	$715	D.24-06-018	$7,364.50	10.30	$715.00	$7,364.50
Melissa W. Kasnitz	2024	33.6	$735	D.24-10-028	$24,696.00	29.50 [2]	$735.00	$21,682.50
Melissa W. Kasnitz	2025	36.8	$755	D.25-10-060	$27,784.00	36.80	$755.00 [1]	$27,784.00
Subtotal: $ 59,844.50						***Subtotal: $56,831.00***		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Melissa W. Kasnitz	2026	10.9	$377.50	½ authorized 2025 rate; see comment below	$ 4,114.75	7.00 [3]	$377.50 [1]	$2,642.50
Subtotal: $ 4,114.75						***Subtotal: $2,642.50***		
TOTAL REQUEST: $ 63,959.25						***TOTAL AWARD: $59,473.50***		

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

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

ATTORNEY INFORMATION			
Attorney	**Date Admitted to CA BAR[4]**	**Member Number**	**Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation**
Melissa W. Kasnitz	1992	162679	No

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

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

Attachment or Comment #	Description/Comment
1	**Certificate of Service**
2	**Detailed Time Records (Merits & Compensation)**
Comments	Because all work on the merits of this proceeding was completed in 2025, CforAT is requesting compensation for work on this request at ½ of the approved 2025 rate of Legal Director Melissa W. Kasnitz, who was CforAT's sole representative in this proceeding. CforAT will seek an updated 2026 rate for Ms. Kasnitz in a future compensation request.

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Melissa Kasnitz (Kasnitz) 2025 Hourly Rate	D.25-10-060 previously approved the rate of $755.00 for Kasnitz in 2025. As Intervenor Compensation Claim Preparation hours are compensated at ½ preparer's normal hourly rate, we apply the rate of $377.50 for Kasnitz in 2025. We note that Kasnitz's IComp Claim Preparation hours were claimed in 2026. However, above in Part III.C, CforAT states, "Because all work on the merits of this proceeding was completed in 2025, CforAT is requesting compensation for work on this request at ½ of the approved 2025 rate…" and "CforAT will seek an updated 2026 rate for Ms. Kasnitz in a future compensation request." As such, Kasnitz's awarded IComp Claim Prep hours will be compensated at her approved 2025 hourly rate, and we do not award a 2026 hourly rate for Kasnitz here.
[2] Lack of Substantial Contribution – Procedural Motion	Pub. Util. Code § 1802(j) states that a substantial contribution means that the intervenor "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." The courts have addressed the requirement of substantial contribution in, for example, TURN v. CPUC 166 Cal.App. 4th 522 (2008), stating at 11: "[T]o be eligible for compensation, the statute requires that the customer have made a 'substantial contribution' to the PUC's proceedings, as the PUC determines. "Substantial contribution' means that, in the judgment of the commission, the customer's presentation has substantially assisted the commission in the making of its order or decision.…"

Item	Reason
	In evaluating whether CforAT made a substantial contribution here, the Commission evaluates whether the hours claimed were commensurate with the contributions claimed by the intervenor. Making a substantial contribution in and of itself does not entitle an intervenor to all its claimed fees and costs. Compensation is granted for efficient, meaningful contributions. CforAT claims 8.20 hours for Kasnitz in May and June 2024 for work related to researching, drafting, revising, finalizing and reviewing their Procedural Motion filed on May 29, 2024. The Motion mainly summarized the proceeding status. Eight hours is an excessive amount for a motion that could have been addressed through a procedural e-mail. Because this work did not substantially contribute to D.25-12-021, 4.10 hours or 50% of the hours for this motion are disallowed.
[3] Excessive IComp Claim Preparation Hours	Section 1801.3(f) provides that the Commission should administer the Intervenor Compensation Program "in a manner that avoids unproductive or unnecessary participation that duplicates the participation of similar interests otherwise adequately represented or participation that is not necessary for a fair determination of the proceeding." We find the request for 10.90 hours to prepare CforAT's Intervenor Compensation Claim by Kasnitz to be excessive given the scope of issues and overall scale of the request. Hours claimed must be reasonable, productive, effective, and efficient. We find that the hours claimed are excessive for the work produced and for breadth of this claim. As a result, we have reduced Kasnitz's time spent preparing this IComp Claim by 3.90 hours, resulting in a total of 7.00 hours awarded.

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

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

B. Comment Period: Was the 30-day comment period waived (*see* Rule 14.6(c)(6))?	Yes

FINDINGS OF FACT

1. Center for Accessible Technology has made a substantial contribution to D.25-12-021.

2. The requested hourly rates for Center for Accessible Technology's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.

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

4. The total amount for reasonable compensation is $59,473.50.

CONCLUSION OF LAW

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

ORDER

1. Center for Accessible Technology is awarded $59,473.50.

2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and Southern California Gas Company shall pay Center for Accessible Technology their respective shares of the award, based on their California-jurisdictional electric and gas revenues for the 2025 calendar year, to reflect the year in which the proceeding was primarily litigated. If such data are unavailable, the most recent electric and gas revenue data shall be used. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning April 29, 2026, the 75th day after the filing of Center for Accessible Technology's request, and continuing until full payment is made.

3. The comment period for today's decision is waived.

This decision is effective today.

Dated August 13, 2026, at San Francisco, California.

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

Commissioner Matthew Baker recused himself and did not participate in the vote of this item.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D2608022	**Modifies Decision?**	No
Contribution Decision(s):	D2512021		
Proceeding(s):	R2008022		
Author:	ALJ Garrett Toy		
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and Southern California Gas Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Center for Accessible Technology	February 13, 2026	$63,959.25	$59,473.50	N/A	*See* Part III.D, CPUC Comments, Disallowances and Adjustments.

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Melissa	Kasnitz	Attorney	$715	2023	$715.00
Melissa	Kasnitz	Attorney	$735	2024	$735.00
Melissa	Kasnitz	Attorney	$755	2025	$755.00

(END OF APPENDIX)