ALJ/KWZ/vhj **Date of Issuance 8/18/2026**

Decision 26-08-029 August 13, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Establish a Framework and Processes for Assessing the Affordability of Utility Service.	Rulemaking 18-07-006 (filed July 12, 2018)

DECISION GRANTING COMPENSATION TO SMALL BUSINESS UTILITY ADVOCATES FOR SUBSTANTIAL CONTRIBUTION TO DECISION 25-12-044

Intervenor: Small Business Utility Advocates (SBUA)	**For contribution to Decision (D.) 25-12-044**
Claimed: $78,513.63	**Awarded:** $65,340.13
Assigned Commissioner: Darcie L. Houck	**Assigned ALJ:** Camille Watts-Zagha

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.25-12-044 (the Decision) makes several adjustments to the Commission's affordability framework to improve consideration of affordability for essential utility services. One adjustment transitions the updates made to the affordability framework via the issuance of the annual Affordability Report to information postings on the Commission's website, under the affordability page, that includes periodic staff updates to the affordability metrics, tools, and analyses on affordability issues, such as the Affordability Report provided in response to Executive Order N-5-24. The Decision affirms the requirement for the investor-owned energy utilities and Class A water utilities to continue to publicly release the Cost and Rate Trackers and eliminates the option to alternatively submit summaries, known as Quarterly Revenue Reports. In addition, the Decision closes the proceeding but recommends next steps for consideration by the Commission to further address affordability issues facing California ratepayers.

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:		10/12/2018
2. Other specified date for NOI:	October 15, 2021	Verified
3. Date NOI filed:	October 15, 2021	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.20-08-020	Verified
6. Date of ALJ ruling:	December 23, 2020	Verified
7. Based on another CPUC determination (specify):		
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.20-08-020	Verified
10. Date of ALJ ruling:	December 23, 2020	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.25-12-044	Verified
14. Date of issuance of Final Order or Decision:	December 22, 2025	Verified
15. File date of compensation request:	February 20, 2026	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion

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

#	Intervenor's Comment(s)	CPUC Discussion
B.2-3	The NOI was filed pursuant to § 7 of the Fourth Amended Scoping Memo, which was issued on 9/15/2021. The Fourth Amended Scoping Memo required that NOIs be filed within 30 days, or on 10/15/2021.	Verified
B.5-12	SBUA is relying on the ruling on its customer status and showing of significant financial hardship in R.20-08-020 on December 23, 2020, within one year prior to SBUA commencing activities in R.18-07-006 and filing its NOI. SBUA also received a ruling on its customer status and showing of significant financial hardship in A.16-09-001 on October 27, 2017, within one year prior to the filing of R.18-07-006. *See* Pub. Util. Code § 1804(b)(1).	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):

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
1. Small Business Affordability Concerns SBUA's participation spanned from Phase 3 through the proceeding's conclusion and was focused primarily on (1) advocating for the inclusion of small business and non-residential customer classes in the affordability framework, and (2) actively engaging Commissioners and staff through ex parte	The Commission explains that the record supporting the Final Decision includes party comments in response to both the 2022 and 2023 Assigned Commissioner's Rulings. Decision at 11, The Commission also addresses SBUA's recommendations in those comments. Decision at 42 (noting that SBUA and Joint Ratepayers "emphatically request that the Commission develop, and require utilities to calculate affordability metrics	Verified

communications and joint advocacy with other ratepayer groups to advance affordability priorities. SBUA consistently argued for the Commission to address affordability concerns of small commercial customers. Although other parties supported non-residential metrics generally, SBUA's advocacy centered specifically on the needs of small business customers. In response to the December 13, 2023 Assigned Commissioner's Ruling seeking annual feedback on implementation of the Affordability Framework, SBUA submitted opening and reply comments emphasizing the need for a small business specific affordability framework and related metrics." Opening Comments of Small Business Utility Advocates to Assigned Commissioner's Ruling Seeking Annual Feedback on the Implementation of the Affordability Framework, Jan. 25, 2024 (SBUA Opening Comments on Affordability Framework);[2] Reply Comments of Small Business Utility Advocates to Assigned Commissioner's Ruling Seeking Annual Feedback on the Implementation of the Affordability Framework, Feb. 16, 2024 (SBUA Reply	for commercial, industrial and small commercial customer classes."). While the Decision finds it infeasible to develop full non-residential affordability metrics within this proceeding due to the residential design of the existing framework, the Decision does "recognize that affordability concerns cut across each of these customer classes and that the Commission should consider how best to address such concerns in the future." Decision at 43. Further, the Commission makes several critical concessions responsive to SBUA's advocacy: First, the Decision requires that the Trackers now produce sample bills for small commercial customers on a quarterly basis, a development SBUA actively supported and promoted. Decision at 42 ("in recognition of the affordability challenges faced by **small commercial ratepayers**, the Trackers now produce sample bills for small commercial customers on a quarterly basis") (emphasis added), at 50 ("In particular, the electric Trackers summarize rate and bill impacts of not just residential customers but also of small business customers."); *see also* Decision at 42, citing fn. 67 (Commission staff working with IOUs on revenue changes and bills for small commercial customers), Finding of Fact (FOF) # 13.	

[2] The Decision incorrectly lists SBUA as filing Opening Comments on November 30, 2022; however, the Docket Card of the proceeding correctly reflects SBUA's January 25, 2024 comments as part of the record.

Comments on Affordability Framework). SBUA further argued that revising the affordability metrics is essential to ensuring small commercial ratepayers receive the benefits and protections afforded to all utility customers under the California Public Utilities Code. SBUA Opening Comments on Affordability Framework at 2. SBUA also emphasized that, absent affordability standards for non-residential customers, neither the utilities nor the Commission can effectively evaluate the economic consequences of rate increases on those ratepayers. SBUA Opening Comments on Affordability Framework at 4; Opening Comments of Small Business Utility Advocates on the Proposed Decision (Dec. 3, 2025) at 2–3. SBUA's participation enriched the record and ensured that small business ratepayer concerns were squarely before the Commission. SBUA's advocacy resulted in several improvements to the Decision, including to the Cost and Rate Trackers (Trackers) and quarterly sample bills for small commercial customers. *See* Reply Comments on the Proposed Decision Updating the Affordability Framework and Closing the Proceeding, Dec. 8, 2025.	Second, the Decision affirms that non-residential affordability "will continue to be addressed through GRC Phase 2 proceedings" and that the "definitions and concepts that were adopted in this proceeding can help guide the discussion of affordability concerns" for non-residential classes. Decision at 73. Third, in response to SBUA (and Joint Ratepayer) comments on the Proposed Decision, the Decision was revised to further explain the Commission's acknowledgment that affordability for non-residential customer classes "is important and deserves attention" and to clarify the path forward. Decision at 76-77. SBUA specifically requested the Final Decision correct the Proposed Decisions treatment of commercial customers as a monolith. *See* SBUA Opening Comments on Proposed Decision Updating the Affordability Framework and Closing the Proceeding, Dec. 3, 2025 (SBUA Opening Comments on PD), at 5. The Decision at 22 also acknowledges SBUA's comments regarding the affordability frameworks potential impact addressing small business customers, as they pertain to ESJ communities ("SBUA states that focusing on non-residential affordability can advance the Commission's ESJ plans").	

Environmental and Social Justice (ESJ) Impact. In its analysis on the need for affordability metrics for small business customers, SBUA discussed how commercial class ratepayers face distinctly different economic pressures than residential ratepayers, including related to supply chain challenges; the lingering effect of the pandemic on consumer demand, particularly in areas with high commercial vacancy rates; and the need to increase wages, a primary factor mitigating a utility's steadily rising rates on residential customers. The impact of rising energy costs also tends to disproportionately harm diverse small businesses in Environmental and Social Justice communities that already face capital constraints. Opening Comments of SBUA on Affordability Framework at 4-5. Ex Parte Communications and Affordability Meetings. SBUA substantially contributed to this proceeding through active participation in ex parte communications, Commission-requested meetings, and stakeholder affordability discussions that materially informed the record and the Commission's analysis. Several of these communications were solicited by the Commission. On June 8, 2023, Energy Division requested SBUA's	In recognition of the work of the intervenors, including participation in en banc meetings, the Decision at 72-73 states, "The record and recommendations of the parties presented in this proceeding has carried over to other proceedings where the Commission is examining and implementing proposals made during two Commission hosted Affordability en banc events." (fn. omitted).	

participation in a call regarding commercial and industrial customer affordability issues, and on November 19, 2024, Commissioner Houck's office requested that SBUA attend an ex parte meeting with the ratepayer affordability group. The Commission's direct requests for SBUA's participation reflect recognition of SBUA's unique expertise as the sole representative of small commercial customer interests in this proceeding. Throughout 2022, SBUA attended the February 28 and March 1 Affordability En Banc, participated in preparatory coordination calls with joint ratepayer parties, and engaged in ex parte meetings with Commissioner Rechtschaffen and President Reynolds's staff to advocate for inclusion of nonresidential affordability considerations in the rulemaking. The Decision expressly references the En Banc proceedings and party recommendations as informing the Commission's affordability work. Decision at 72-73. SBUA's advocacy during this period focused on the need to address commercial customer impacts within the affordability framework, an issue subsequently discussed in the Decision's treatment of business and commercial customer classes. In 2024 and 2025, SBUA participated in ex parte		

communications with Commissioners Houck, Reynolds, Baker, and Douglas, advocating alongside other ratepayer representatives for stronger affordability protections and consideration of cumulative rate impacts. The Decision ultimately requires energy utilities to compare rates and revenue trends to general inflation, separated by operational and capital spending. Decision at 31-37.		

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: Utility Consumers' Action Network (UCAN), California Large Energy Consumers Association (CLECA), Energy Producers and Users Coalition (EPUC), the Utility Reform Network (TURN), and California Farm Bureau Federation.		Noted
d. Intervenor's claim of non-duplication: SBUA's participation did not duplicate the efforts of other parties. SBUA is the sole representative of small commercial customer interests in this proceeding. While SBUA coordinated with the Joint Ratepayers (CLECA and EPUC) on certain positions, SBUA's perspective is distinct in that it focuses on the particular needs and affordability challenges facing California's small businesses, a constituency that is neither residential nor large commercial or industrial. No other party in this proceeding, including Cal Advocates, TURN, or CforAT, represents this customer class. To the extent SBUA's positions overlapped with those of other		Noted

parties, such participation served to supplement, complement, or contribute to the presentation of issues by those parties.	

C. Additional Comments on Part II:

#	Intervenor's Comment	CPUC Discussion
II.A.	Partial Success. Although the Commission declined to adopt SBUA's proposal to develop standalone small business affordability metrics, concluding that such metrics were infeasible within the residential design of the existing framework, SBUA nonetheless made a substantial contribution to the Decision. SBUA expanded the record regarding non-residential affordability, and the importance of the concerns raised by SBUA. The Decision further provides that the Cost and Rate Trackers now produce quarterly sample bills for small commercial customers, improving transparency regarding impacts on that customer class. Under the Commission's precedent, a party need not prevail on every issue to make a substantial contribution. A substantial contribution includes evidence or argument that supports part of a decision, even if the Commission does not adopt the party's position in full. *See* Intervenor Compensation Program Guide (2017) at 18; D.02-03-033 at 3, 5; Pub. Util. Code § 1802(j); D.08-04-004 at 5-6; D.09-04-027 at 4. The Decision also confirms that non-residential affordability will continue to be addressed in GRC Phase 2 proceedings using the concepts developed in this docket, establishing a forward-looking path consistent with SBUA's advocacy.	Noted

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: SBUA's participation in this final phase of the proceeding was merited given the significance of the affordability issues and their impact on small commercial ratepayers. SBUA focused its efforts on reviewing implementation of the Affordability Framework, preparing targeted comments on small business inclusion, and engaging in substantive meetings and ex parte communications regarding non-residential affordability concerns. SBUA obtained party status in 2021, and this is SBUA's sole intervenor compensation claim in this proceeding. Although the Commission did not adopt SBUA's proposal to develop standalone small business affordability metrics, SBUA's advocacy materially contributed to the Decision by expanding the record regarding non-residential affordability and by prompting the Commission to address small commercial customer impacts within the Cost and Rate Trackers. The Decision recognizes that affordability concerns extend across customer classes and provides that the Trackers now produce quarterly sample bills for small commercial customers. Decision at 42, 50. These enhancements materially improve transparency regarding affordability impacts on small commercial ratepayers, a constituency that, absent SBUA's participation, would have gone unrepresented in this proceeding.	Noted
b. Reasonableness of hours claimed: SBUA efficiently directed its participation in this phase of the proceeding toward reviewing implementation of the Affordability Framework and providing advocacy and comments regarding the inclusion of small business customers. SBUA was represented by mid-level attorney Michael Raykher, who serves as outside counsel and led the effort to draft SBUA's comments on the Affordability Framework, and by SBUA Litigation Supervisor Jennifer Weberski, a SBUA employee, who coordinated SBUA's engagement in ex parte and affordability meetings and drafted comments on the Proposed Decision. Ms. Weberski has over 25 years of utility regulatory experience. Drawing on her extensive experience and SBUA's involvement in related	Noted

	CPUC Discussion
utility proceedings, she participated efficiently in this docket and devoted a reasonable amount of time to this phase of the proceeding.[3] SBUA utilized two experts. SBUA Senior Energy Policy Analyst Ted Howard, a SBUA employee with over 40 years of professional experience, attended several workshops and assisted in developing SBUA's positions. SBUA also secured input from outside expert Paul Chernick of Resource Insight, Inc. (RII). Mr. Chernick, President of RII, has over 40 years of experience in utility regulation and assisted in developing SBUA's positions on small business affordability in this proceeding. RII provided services as an outside consultant on a deferred and contingency basis. *See* <u>Attachment 3</u> (contract between SBUA and RII). In addition, SBUA's General Counsel, James Birkelund, provided strategic oversight, managed the legal team, and conducted high-level review of, and provided input on, SBUA's advocacy and positions. Mr. Birkelund was previously an employee of SBUA in 2021 and 2022, but beginning in 2023, he has been employed by E&E Law Corp., which represents SBUA in this matter on a contingency basis at prevailing market rates. Mr. Raykher was also employed by E&E Law Corp. *See* <u>Attachment 4</u> (Statement of Work detailing contractual terms). The Commission has previously approved this outside consultant relationship and its associated attorney-client agreement. *See, e.g.*, D.25-12-038, D.25-05-023, D.25-05-021, D.25-04-012, D.25-03-029, and D.25-02-025. Given the importance of this OIR and affordability for all ratepayers, including small business customers, SBUA submits that the time recorded reflects an appropriate level of engagement and effort in this phase of the proceeding. Accordingly, SBUA seeks compensation for all hours submitted by its attorneys and experts, as set forth in the attached timesheets.	
c. Allocation of hours by issue: SBUA has assigned the following issue codes: Issue 1 – Affordability Concerns and Small Business – 54.85 hrs/ 51.4% Issue 2 – Environmental & Social Justice - 2.95 hrs/ 2.8% Issue 3 – Ex Parte and Affordability Meetings – 42.35 hrs/ 39.7% Issue 4 – General Participation, including hearings and workshops – 6.5 hrs/ 6.1%	Noted. Totals 100%

[3] Attorney Jeffrey Winmill assisted in the proceeding as well, filing SBUA's NOI and attending a prehearing conference; however, due to his limited engagement SBUA is waiving his time.

B. Specific Claim:*

Claimed						CPUC Award		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Jennifer Weberski	2022	12.55	$675	D.23-12-031	$8,471.25	11.45 [1]	$675.00 [2]	$7,728.75
Jennifer Weberski	2023	7.5	$705	D.24-02-031	$5,287.50	5.65 [3]	$705.00 [2]	$3,983.25
Jennifer Weberski	2024	7.55	$735	D.25-06-029	$5,549.25	6.15 [4]	$735.00 [2]	$4,520.25
Jennifer Weberski	2025	15.55	$760	D.25-06-029, escalated by 3.46% for 2025	$11,818.00	12.80 [5]	$760.00 [2]	$9,728.00
Ted Howard	2023	5.3	$460	D.24-03-070	$2,438.00	5.30	$460.00 [6]	$2,438.00
Paul Chernick	2022	2.0	$505	D.23-11-031	$1,010.00	2.00	$505.00 [7,8]	$1,010.00
Michael Raykher	2024	19.2	$520	D.25-12-038 setting 2023 rate at $500, escalated by 4.07% for 2024	$9,984.00	19.20	$520.00 [8,9]	$9,984.00
James Birkelund	2021	3.75	$650	D.22-08-046	$2,437.50	3.10 [10]	$650.00 [8,11]	$2,015.00
James Birkelund	2022	2.75	$705	D.23-02-016	$1,938.75	2.10 [12]	$705.00 [8,11]	$1,480.50
James Birkelund	2023	9.75	$770	D.24-10-025	$7,507.50	8.75 [13]	$770.00 [8,11]	$6,737.50
James Birkelund	2024	7.25	$800	D.24-12-069	$5,800.00	6.35 [14]	$800.00 [8,11]	$5,080.00
James Birkelund	2025	13.5	$830	D.25-07-036	$11,205.00	8.60 [15]	$830.00 [8,11]	$7,138.00
					Subtotal: $73,446.75			***Subtotal: $61,843.25***
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
James Birkelund	2021	1.4	$325	50% of 2021 rate	$455.00	1.40	$325.00	$455.00

							[8,11]	
Jennifer Weberski	2026	11.75	$392.5	50% of 2026 Rate ($785), reflecting a 3.3% escalation over 2025 rate	$4,611.88	7.75 [16]	$392.50 [17]	$3,041.88
					Subtotal: $5,066.88			***Subtotal: $3,496.88***
					TOTAL REQUEST: $78,513.63			***TOTAL AWARD: $65,340.13***

*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
James M. Birkelund	March 2000	206328	No
Jennifer L. Weberski	Connecticut, 1997; Washington D.C., 2003	Conn. Bar # 414546; D.C. Bar # 481853	No
Mikhail Raykher[5]	New York, 2013; Maryland, 2013	New York State Bar # 5130653; Maryland State Bar # 1306190253	No

C. Attachments Documenting Specific Claim and Comments on Part III[6]:

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Timesheets of Attorneys & Experts
Attachment 3	Contract with Resource Insight, Inc.

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

[5] Attorney Michael Raykher is also known professionally by the variant spelling Mikhail Raykher.

[6] Attachments not included in final Decision.

Attachment or Comment #	Description/Comment
Attachment 4	Statement of Work with E&E Law Corp.

D. CPUC Comments, Disallowances, and Adjustments

<table>
<tr><th>Item</th><th>Reason</th></tr>
<tr><td>[1]
Reduction of Hours for Jennifer Weberski in 2022</td><td><u>Administrative and Clerical Work</u>

The Commission does not compensate attorneys for time spent on clerical or administrative tasks, as such work is considered subsumed within professional fees. Administrative tasks typically include scheduling, communications with the Commission’s Docket Office regarding filing procedures, overseeing administrative staff, photocopying, scanning, and other similar clerical activities. (See D.11-07-024 at 18.) In line with this policy, we have adjusted the entries below for a total reduction of 1.10 hours:

<table>
<tr><th>Date</th><th>Activity</th><th>Hours</th></tr>
<tr><td>6/7/2022</td><td>Email attorneys re joint affordability call with parties</td><td>0.10</td></tr>
<tr><td>12/5/2022</td><td>Email regarding request for follow-up mtg with Comm. Houck</td><td>0.50</td></tr>
<tr><td>12/8/2022</td><td>Email regarding request for follow-up mtg with Comm. Houck</td><td>0.50</td></tr>
</table></td></tr>
<tr><td>[2]
Jennifer Weberski 2022-2025 Hourly Rate</td><td>D.23-11-031 approved the 2022 hourly rate of $675.00 for Jennifer Weberski as a Legal - Attorney - V.

D.24-02-031 approved the 2023 hourly rate of $705.00 for Jennifer Weberski as a Legal - Attorney - V.

D.25-06-029 approved the 2024 hourly rate of $735.00 for Jennifer Weberski as a Legal - Attorney – V.

D.26-02-056 approved the 2025 hourly rate of $760.00 for Jennifer Weberski as a Legal - Attorney - V.</td></tr>
<tr><td>[3]
Reduction of Hours for Jennifer Weberski in 2023</td><td><u>Vague Timesheet Entry</u>

We find that SBUA has multiple vague or undefined time entries, totaling 1.75 hours. Rule 17.4 requires that every time entry clearly identify the specific task performed. We suspect that some of these entries may be tasks within a larger task and could be related. However, SBUA should provide clearer descriptions so that Commission staff are not left to make assumptions. The entries listed below lack the necessary detail to determine their relevance or value to the</td></tr>
</table>

<table>
<tr><th>Item</th><th>Reason</th></tr>
<tr><td></td><td>
proceeding, and do not comply with program requirements. Accordingly, we reduce the entries below by a total of 1.00 hours. We further note that the following activities do not clearly demonstrate how they contributed to the Commission’s decision-making process. Intervenors bear the burden of proof to show that all claimed hours were spent efficiently and made a substantial contribution, as required under program guidelines.
<table>
<tr><th>Date</th><th>Activity</th><th>Hours</th></tr>
<tr><td>1/5/2023</td><td>Email communication with joint parties</td><td>0.50</td></tr>
<tr><td>4/13/2023</td><td>Email with Joint ratepayer group on Phase 3</td><td>0.25</td></tr>
<tr><td>5/24/2023</td><td>Email update with Joint ratepayer parties post-Scoping</td><td>0.75</td></tr>
</table>
<u>Internal Duplication</u>
The Commission compensates intervenors for reasonable and efficient participation that contributes to the development of the record and aids in decision-making. However, we find that SBUA's claimed hours reflect a significant duplication of effort. Specifically, multiple representatives, whether attorneys or experts—worked on the same issues, frequently emailed, conferred, and reviewed each other’s work, attended the same meetings, hearings, or workshops, and participated in activities where only one representative would have been sufficient, given the relative simplicity or limited scope of the issues involved.
This level of staffing resulted in unnecessary, redundant, and inefficient participation that did not provide added value to the proceeding. Accordingly, we find that the involvement of multiple representatives in these instances was not justified and resulted in excessive hours. As a result, we reduce the entries below by a total of 0.60 hours to ensure that only reasonable and non-duplicative efforts are compensated.
<table>
<tr><th>Date</th><th>Activity</th><th>Hours</th></tr>
<tr><td>2/2/2023</td><td>Internal discussion with J. Birkelund</td><td>0.25</td></tr>
<tr><td>2/8/2023</td><td>Review T. Howard notes on En Banc</td><td>1.00</td></tr>
</table>
<u>Administrative and Clerical Work</u>
The Commission does not compensate attorneys for time spent on clerical or administrative tasks, as such work is considered subsumed within professional
</td></tr>
</table>

<table>
<tr><th>Item</th><th>Reason</th></tr>
<tr><td></td><td>fees. Administrative tasks typically include scheduling, communications with the Commission's Docket Office regarding filing procedures, overseeing administrative staff, photocopying, scanning, and other similar clerical activities. (See D.11-07-024 at 18.) In line with this policy, we have adjusted the entry below for a total reduction of 0.25 hours:

<table>
<tr><th>Date</th><th>Activity</th><th>Hours</th></tr>
<tr><td>6/7/2023</td><td>Confirm availability to attend ED call</td><td>0.25</td></tr>
</table>

The total number of reductions for Jennifer Weberski is 1.85 hours, leaving 5.65 hours approved for compensation in 2023.</td></tr>
<tr><td>[4]
Reduction of Hours for Jennifer Weberski in 2024</td><td><u>Internal Duplication</u>

The Commission compensates intervenors for reasonable and efficient participation that contributes to the development of the record and aids in decision-making. However, we find that SBUA's claimed hours reflect a significant duplication of effort. Specifically, multiple representatives, whether attorneys or experts—worked on the same issues, frequently emailed, conferred, and reviewed each other's work, attended the same meetings, hearings, or workshops, and participated in activities where only one representative would have been sufficient, given the relative simplicity or limited scope of the issues involved.

This level of staffing resulted in unnecessary, redundant, and inefficient participation that did not provide added value to the proceeding. Accordingly, we find that the involvement of multiple representatives in these instances was not justified and resulted in excessive hours. As a result, we reduce the entries below by a total of 0.40 hours to ensure that only reasonable and non-duplicative efforts are compensated.

<table>
<tr><th>Date</th><th>Activity</th><th>Hours</th></tr>
<tr><td>1/17/2024</td><td>Discuss w/ J. Birkelund staffing and comments on ACR</td><td>0.25</td></tr>
<tr><td>1/30/2024</td><td>Crrspnd with M. Raykher about reply comments</td><td>0.50</td></tr>
</table>

<u>Administrative and Clerical Work</u>

The Commission does not compensate attorneys for time spent on clerical or administrative tasks, as such work is considered subsumed within professional fees. Administrative tasks typically include scheduling, communications with the Commission's Docket Office regarding filing procedures, overseeing administrative staff, photocopying, scanning, and other similar clerical</td></tr>
</table>

<table>
<tr><th>Item</th><th>Reason</th></tr>
<tr><td></td><td>activities. (See D.11-07-024 at 18.) In line with this policy, we have adjusted the entries below for a total reduction of 1.00 hours:

<table>
<tr><th>Date</th><th>Activity</th><th>Hours</th></tr>
<tr><td>11/1/2024</td><td>Email discussion on Houck request to meet with group</td><td>0.50</td></tr>
<tr><td>11/5/2024</td><td>Finalize discussion on Houck req. with group</td><td>0.50</td></tr>
</table>

The total number of reductions for Jennifer Weberski is 1.40 hours, leaving 6.15 hours approved for compensation in 2024.</td></tr>
<tr><td>[5]
Reduction of Hours for Jennifer Weberski in 2025</td><td><u>Administrative and Clerical Work</u>

The Commission does not compensate attorneys for time spent on clerical or administrative tasks, as such work is considered subsumed within professional fees. Administrative tasks typically include scheduling, communications with the Commission’s Docket Office regarding filing procedures, overseeing administrative staff, photocopying, scanning, and other similar clerical activities. (See D.11-07-024 at 18.) In line with this policy, we have adjusted the entry below for a total reduction of 0.25 hours:

<table>
<tr><th>Date</th><th>Activity</th><th>Hours</th></tr>
<tr><td>11/26/2025</td><td>Email request for ex parte to Comm. Houck staff</td><td>0.25</td></tr>
</table>

<u>Excessive Hours</u>

While SBUA’s arguments were helpful, the number of hours claimed is excessive relative to their impact. Excessive is when the Commission determines that the time claimed is disproportionate to the reasonable amount of effort required for that contribution. Furthermore, the burden of proof is on the intervenor to show that each of the hours claimed was spent productively making a substantial contribution to the decision. In this instance, SBUA failed to prove that. Accordingly, we have adjusted the entries below for a total reduction of 2.50 hours:

<table>
<tr><th>Date</th><th>Task</th><th>Hours</th></tr>
<tr><td>12/2/2025</td><td>Draft comments on PD</td><td>1.25</td></tr>
<tr><td>12/3/2025</td><td>Edit and finalize PD comments</td><td>1.25</td></tr>
<tr><td>12/4/2025</td><td>Review party comments on PD for reply</td><td>1.25</td></tr>
<tr><td>12/8/2025</td><td>Draft, edit and finalize reply comments on PD</td><td>1.50</td></tr>
</table>

The total number of reductions for Jennifer Weberski is 2.75 hours, leaving 12.80 hours approved for compensation in 2025.</td></tr>
</table>

Item	Reason
[6] Ted Howard 2023 Hourly Rate	D.24-03-070 approved the 2023 hourly rate of $460.00 for Ted Howard as an Expert - Public Policy Analyst - IV.
[7] Paul Chernick 2022 Hourly Rate	Upon further review, the Commission has determined that Paul Chernick is a consultant. Pursuant to Commission policy, the rate requested by an intervenor must not exceed the rate billed to that intervenor by any outside consultant it hires, even if the consultant's billed rate is below the floor for a given experience level.[7] Per the IComp Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). The Commission requested supplemental documentation be submitted by SBUA to confirm the rate charged by Paul Chernick. SBUA confirms that per the terms of their contract, Paul Chernick has been hired on a contingency basis, meaning that the consultant has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on Paul Chernick's experience. Given the 2022 Expert – Public Policy Analyst V rate range is $513.53 to $890.25 with a median of $672.43, we find the 2022 hourly rate of $505.00 to be reasonable and we apply it here. The award made herein for the consultant's contribution in this proceeding shall be passed through in full to the consultant, and no portion of this part of the award shall be kept by the intervenor. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission's policy on consultant compensation, and the understanding that the consultant has not billed or collected compensation for the work performed until the final award is given. We reiterate that it is the responsibility of the intervenor to be forthcoming about engaging consultants and the terms of the contract, to adhere to the Commission's policy on compensation for consultant fees, and to provide the appropriate documentation with the initial claim to ensure efficient processing and thus avoid the need for the Commission to request supplemental documentation. In this instance, SBUA did not provide all the documentation pertaining to the contract terms between SBUA and Paul Chernick in the initial

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

Item	Reason
	claim and waited until the Commission requested supplemental documentation which delays the processing of the claim.
[8] Contingency Rate Disclaimer	The Commission takes this opportunity to remind all intervenors that they bear the burden of providing accurate, complete, and honest information in all compensation requests. The Commission relies on intervenors' good faith representations, particularly regarding consultant agreements and payments, as it does not have the resources to review every contract or non-standard arrangement in detail. Intervenor compensation is funded by ratepayers, and the Commission takes seriously any effort to mislead or obscure the financial basis for a claim. Although no violation of Rule 1.1 has been found in this instance, we remind intervenors that under Rule 1.1, intent to deceive is not required for a violation, misstatements may still be actionable. Dishonest or misleading claims not only risk denial of compensation but may also subject the intervenor to penalties. The Commission has clear authority to audit intervenors' books and records to verify the basis for any award. Intervenors must therefore ensure full transparency regarding actual time spent on issues, consultant fees, payment arrangements, and the actual disbursement of funds. Failure to meet this obligation undermines the integrity of the compensation process and may lead to denial of claims or further enforcement action.
[9] Michael Raykher 2024 Hourly Rate	Upon further review, the Commission has determined that Michael Raykher is a consultant. Pursuant to Commission policy, the rate requested by an intervenor must not exceed the rate billed to that intervenor by any outside consultant it hires, even if the consultant's billed rate is below the floor for a given experience level.[8] Per the IComp Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). The Commission requested supplemental documentation be submitted by SBUA to confirm the rate charged by Michael Raykher. SBUA confirms that per the terms of their contract, Michael Raykher has been hired on a contingency basis, meaning that the consultant has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on Michael Raykher's experience. Given that the 2024 rate range for Legal - Attorney - IV is $421.18 to $680.49, we find the requested 2024 hourly rate of $520 to be reasonable and we adopt it here.

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

<table>
<tr><th>Item</th><th>Reason</th></tr>
<tr><td></td><td> The award made herein for the consultant's contribution in this proceeding shall be passed through in full to the consultant, and no portion of this part of the award shall be kept by the intervenor. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission's policy on consultant compensation, and the understanding that the consultant has not billed or collected compensation for the work performed until the final award is given. We reiterate that it is the responsibility of the intervenor to be forthcoming about engaging consultants and the terms of the contract, to adhere to the Commission's policy on compensation for consultant fees, and to provide the appropriate documentation with the initial claim to ensure efficient processing and thus avoid the need for the Commission to request supplemental documentation. In this instance, SBUA did not provide all the documentation pertaining to the contract terms between SBUA and Michael Raykher in the initial claim and waited until the Commission requested supplemental documentation which delays the processing of the claim. </td></tr>
<tr><td>[10] Reduction of Hours for James Birkelund in 2021</td><td> <u>Internal Duplication</u> The Commission compensates intervenors for reasonable and efficient participation that contributes to the development of the record and aids in decision-making. However, we find that SBUA's claimed hours reflect a significant duplication of effort. Specifically, multiple representatives, whether attorneys or experts—worked on the same issues, frequently emailed, conferred, and reviewed each other's work, attended the same meetings, hearings, or workshops, and participated in activities where only one representative would have been sufficient, given the relative simplicity or limited scope of the issues involved. This level of staffing resulted in unnecessary, redundant, and inefficient participation that did not provide added value to the proceeding. Accordingly, we find that the involvement of multiple representatives in these instances was not justified and resulted in excessive hours. As a result, we reduce the entries below by a total of 0.65 hours to ensure that only reasonable and non-duplicative efforts are compensated. <table><tr><th>Date</th><th>Activity</th><th>Hours</th></tr><tr><td>10/5/2021</td><td>Confer w J. Winmill re positions re the same.</td><td>0.75</td></tr><tr><td>10/20/2021</td><td>Strategy call w J. Winmill re his attendance on behalf of SBUA at PHC</td><td>0.50</td></tr></table></td></tr>
</table>

Item	Reason
[11] James Birkelund 2021-2025 Hourly Rate	Upon further review, the Commission has determined that James Birkelund is a consultant. Pursuant to Commission policy, the rate requested by an intervenor must not exceed the rate billed to that intervenor by any outside consultant it hires, even if the consultant's billed rate is below the floor for a given experience level.[9] Per the IComp Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). The Commission requested supplemental documentation be submitted by SBUA to confirm the rate charged by James Birkelund. SBUA confirms that per the terms of their contract, James Birkelund has been hired on a contingency basis, meaning that the consultant has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on James Birkelund's experience. Given that the 2021 rate range for Legal - Legal Director - III is \$396.85 to \$673.25, we find the requested 2021 hourly rate of \$650 to be reasonable and we adopt it here. Given that the 2022 rate range for Legal - Legal Director - IV is \$489.85 to \$803.97, we find the requested 2022 hourly rate of \$705 to be reasonable and we adopt it here. Given that the 2023 rate range for Legal - Legal Director - IV is \$518.55 to \$832.67, we find the requested 2023 hourly rate of \$770 to be reasonable and we adopt it here. Given that the 2024 rate range for Legal - Legal Director - IV is \$545.91 to \$860.03, we find the requested 2024 hourly rate of \$800 to be reasonable and we adopt it here. Given that the 2025 rate range for Legal - Legal Director - IV is \$570.12 to \$884.24, we find the requested 2025 hourly rate of \$830 to be reasonable and we adopt it here. The award made herein for the consultant's contribution in this proceeding shall be passed through in full to the consultant, and no portion of this part of the award shall be kept by the intervenor. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission's policy on consultant compensation, and the understanding that

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

<table>
<tr><th>Item</th><th>Reason</th></tr>
<tr><td></td><td>the consultant has not billed or collected compensation for the work performed until the final award is given.

We reiterate that it is the responsibility of the intervenor to be forthcoming about engaging consultants and the terms of the contract, to adhere to the Commission’s policy on compensation for consultant fees, and to provide the appropriate documentation with the initial claim to ensure efficient processing and thus avoid the need for the Commission to request supplemental documentation. In this instance, SBUA did not provide all the documentation pertaining to the contract terms between SBUA and James Birkelund in the initial claim and waited until the Commission requested supplemental documentation which delays the processing of the claim.</td></tr>
<tr><td>[12] Reduction of Hours for James Birkelund in 2022</td><td><u>Internal Duplication</u>

The Commission compensates intervenors for reasonable and efficient participation that contributes to the development of the record and aids in decision-making. However, we find that SBUA's claimed hours reflect a significant duplication of effort. Specifically, multiple representatives, whether attorneys or experts—worked on the same issues, frequently emailed, conferred, and reviewed each other’s work, attended the same meetings, hearings, or workshops, and participated in activities where only one representative would have been sufficient, given the relative simplicity or limited scope of the issues involved.

This level of staffing resulted in unnecessary, redundant, and inefficient participation that did not provide added value to the proceeding. Accordingly, we find that the involvement of multiple representatives in these instances was not justified and resulted in excessive hours. As a result, we reduce the entries below by a total of 0.65 hours to ensure that only reasonable and non-duplicative efforts are compensated.

<table>
<tr><th>Date</th><th>Activity</th><th>Hours</th></tr>
<tr><td>2/23/2022</td><td>Strategy crrspnd w SBUA attorneys re affordability and coordination of efforts w other intervenors.</td><td>0.50</td></tr>
<tr><td>3/2/2022</td><td>Crrspnd to J. Weberski re affordability strategies.</td><td>0.25</td></tr>
<tr><td>4/13/2022</td><td>As above.</td><td>0.25</td></tr>
<tr><td>12/7/2022</td><td>Confer w J. Weberski re follow-up call w Cmmn Houck re affordability.</td><td>0.25</td></tr>
</table>
</td></tr>
<tr><td>[13] Reduction of Hours for</td><td><u>Internal Duplication</u></td></tr>
</table>

<table>
<tr><th>Item</th><th>Reason</th></tr>
<tr><td>James Birkelund in 2023</td><td>
The Commission compensates intervenors for reasonable and efficient participation that contributes to the development of the record and aids in decision-making. However, we find that SBUA's claimed hours reflect a significant duplication of effort. Specifically, multiple representatives, whether attorneys or experts—worked on the same issues, frequently emailed, conferred, and reviewed each other's work, attended the same meetings, hearings, or workshops, and participated in activities where only one representative would have been sufficient, given the relative simplicity or limited scope of the issues involved.
This level of staffing resulted in unnecessary, redundant, and inefficient participation that did not provide added value to the proceeding. Accordingly, we find that the involvement of multiple representatives in these instances was not justified and resulted in excessive hours. As a result, we reduce the entries below by a total of 1.00 hours to ensure that only reasonable and non-duplicative efforts are compensated.
<table>
<tr><th>Date</th><th>Activity</th><th>Hours</th></tr>
<tr><td>1/18/2023</td><td>Confer w J. Weberski re Cmmn Houck call and next steps.</td><td>0.25</td></tr>
<tr><td>1/25/2023</td><td>Confer w J. Weberski re party recommendations for Ph3, including addn attention and information on commercial customers.</td><td>0.25</td></tr>
<tr><td>2/2/2023</td><td>Confer w T. Howard re En Banc re gas market and gas prices on electricity markets.</td><td>0.25</td></tr>
<tr><td>6/16/2023</td><td>Confer w J. Weberski re ED call re ratepayer group in next en banc.</td><td>0.25</td></tr>
<tr><td>11/1/2023</td><td>Crrspnd w J. Weberski re SBUA positions and joining protest.</td><td>0.25</td></tr>
<tr><td>11/16/2023</td><td>Crrspnd w J. Weberski re SBUA ex parte w CLECA, and others</td><td>0.25</td></tr>
<tr><td>12/13/2023</td><td>Confer w J. Weberski re litigation strategy.</td><td>0.25</td></tr>
<tr><td>12/20/2023</td><td>Confer w J. Weberski re addn group ex parte meeting scheduled.</td><td>0.25</td></tr>
</table>
</td></tr>
<tr><td>[14] Reduction of Hours for James Birkelund in 2024</td><td>
<u>Internal Duplication</u>
The Commission compensates intervenors for reasonable and efficient participation that contributes to the development of the record and aids in decision-making. However, we find that SBUA's claimed hours reflect a significant duplication of effort. Specifically, multiple representatives, whether attorneys or experts—worked on the same issues, frequently emailed, conferred, and reviewed each other's work, attended the same meetings,
</td></tr>
</table>

<table>
<tr><th>Item</th><th>Reason</th></tr>
<tr><td></td><td>hearings, or workshops, and participated in activities where only one representative would have been sufficient, given the relative simplicity or limited scope of the issues involved.

This level of staffing resulted in unnecessary, redundant, and inefficient participation that did not provide added value to the proceeding. Accordingly, we find that the involvement of multiple representatives in these instances was not justified and resulted in excessive hours. As a result, we reduce the entries below by a total of 0.90 hours to ensure that only reasonable and non-duplicative efforts are compensated.

<table>
<tr><th>Date</th><th>Activity</th><th>Hours</th></tr>
<tr><td>1/16/2024</td><td>Strategy direction w J. Weberski re SBUA cmmts on ALJ ruling.</td><td>0.25</td></tr>
<tr><td>1/18/2024</td><td>Confer w M. Raykher re cmmts on ALJ Qs.</td><td>0.25</td></tr>
<tr><td>1/26/2024</td><td>Confer w J. Weberski re strategy for SBUA reply cmmts.</td><td>0.25</td></tr>
<tr><td>2/15/2024</td><td>Emails w M. Raykher re the same.</td><td>0.25</td></tr>
<tr><td>11/5/2024</td><td>Confer w J. Weberski re mtg w Cmmr Houck.</td><td>0.25</td></tr>
<tr><td>11/27/2024</td><td>Confer w J. Weberski re ex parte w Cmmr Pr. Reynolds.</td><td>0.25</td></tr>
<tr><td>12/11/2024</td><td>Confer w J. Weberski re mtg w Exec Dir Peterson.</td><td>0.25</td></tr>
</table>
</td></tr>
<tr><td>[15] Reduction of Hours for James Birkelund in 2025</td><td><u>Internal Duplication</u>

The Commission compensates intervenors for reasonable and efficient participation that contributes to the development of the record and aids in decision-making. However, we find that SBUA's claimed hours reflect a significant duplication of effort. Specifically, multiple representatives, whether attorneys or experts—worked on the same issues, frequently emailed, conferred, and reviewed each other’s work, attended the same meetings, hearings, or workshops, and participated in activities where only one representative would have been sufficient, given the relative simplicity or limited scope of the issues involved.

This level of staffing resulted in unnecessary, redundant, and inefficient participation that did not provide added value to the proceeding. Accordingly, we find that the involvement of multiple representatives in these instances was not justified and resulted in excessive hours. As a result, we reduce the entries</td></tr>
</table>

Item	Reason
	below by a total of 0.65 hours to ensure that only reasonable and non-duplicative efforts are compensated. **Date** / **Activity** / **Hours** 1/8/2025 — Confer w J. Weberski re strategy after Cmmn mtgs. — 0.25 1/15/2025 — Confer w J. Weberski re mtgs w Cmmnrs and PUC Ex Director. — 0.25 3/12/2025 — Strategy w J. Weberski re affordability mtgs w other advocates. — 0.25 11/26/2025 — Confer w J. Weberski re ex parte mtgs. — 0.25 12/10/2025 — Strategy call W J. Weberski re ex parte w Cmmnr Houck. — 0.25 *Excessive Hours* While SBUA's arguments were helpful, the number of hours claimed is excessive relative to their impact. Excessive is when the Commission determines that the time claimed is disproportionate to the reasonable amount of effort required for that contribution. Furthermore, the burden of proof is on the intervenor to show that each of the hours claimed was spent productively making a substantial contribution to the decision. In this instance, SBUA failed to prove that. Accordingly, we have adjusted the entries below for a total reduction of 4.25 hours: **Date** / **Task** / **Hours** 12/2/2025 — Draft/edits SBUA op cmmts on PD. — 2.50 12/3/2025 — Addn edits to op cmmts. — 4.75 12/4/2025 — Rev other parties' op cmmts. — 1.25 The total number of reductions for James Birkelund is 4.90 hours, leaving 8.60 hours approved for compensation in 2025.
[16] Excessive IComp Claim Prep Hours	Jennifer Weberski claimed 11.75 hours in 2026 for preparation of the intervenor compensation request. While the claim was detailed, organized, and generally compliant with Commission requirements, we find the preparation hours excessive given the scope of issues and overall scale of the request. Jennifer Weberski has significant experience practicing before the Commission and preparing similar claims, and we would expect greater efficiency in compiling this request.

Item	Reason
	Accordingly, we reduce the claimed hours by 4.00 hours, awarding 7.75 hours for claim preparation in 2026. This adjustment better reflects the complexity and scale of the request.
[17] Jennifer Weberski 2026 Hourly Rate	SBUA requests an hourly rate of $785 for Jennifer Weberski in in the role of Attorney – V. We note that SBUA's requested hourly rate is based on the 2026 escalation. D.26-02-056 approved the rate of $760.00 in 2025. For 2026 hourly rate, the Commission applies the annual escalation methodology adopted in Resolution ALJ-393, which is a percent change of 3.35%. With a 2025 rate of $760.00 previously established, and based on the escalation factor of 3.35%, a 2026 rate of $785.00 is calculated, rounded to the nearest five dollars. As Intervenor Compensation Claim Preparation hours are compensated at ½ preparer's normal hourly rate, we apply the rate of $392.50 in 2026.

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. Small Business Utility Advocates has made a substantial contribution to D.25-12-044.

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

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

4. The total of reasonable compensation is $65,340.13.

CONCLUSION OF LAW

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

ORDER

1. Small Business Utility Advocates is awarded $65,340.13.

2. Within 30 days of the effective date of this decision, the California Public Utilities Commission shall pay Small Business Utility Advocates the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning May 6, 2026, the 75th day after the filing of Small Business Utility Advocates' request, and continuing until full payment is made.

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

This decision is effective today.

Dated 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:	D2608029	**Modifies Decision?**	No
Contribution Decision(s):	D2512044		
Proceeding(s):	R1807006		
Author:	ALJ Camille Watts-Zagha		
Payer(s):	California Public Utilities Commission		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Small Business Utility Advocates	February 20, 2026	$78,513.63	$65,340.13	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
Jennifer	Weberski	Attorney	$675	2022	$675
Jennifer	Weberski	Attorney	$705	2023	$705
Jennifer	Weberski	Attorney	$735	2024	$735
Jennifer	Weberski	Attorney	$760	2025	$760
Jennifer	Weberski	Attorney	$785	2026	$785
Ted	Howard	Expert	$460	2023	$460
Paul	Chernick	Consultant	$505	2022	$505
Michael	Raykher	Consultant	$520	2024	$520
James	Birkelund	Consultant	$650	2021	$650
James	Birkelund	Consultant	$705	2022	$705
James	Birkelund	Consultant	$770	2023	$770
James	Birkelund	Consultant	$800	2024	$800

James	Birkelund	Consultant	$830	2025	$830

(END OF APPENDIX)