Decision 26-08-023 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 ENVIRONMENTAL DEFENSE FUND FOR SUBSTANTIAL CONTRIBUTION TO DECISION 25-12-044

| | |
|---|---|
| **Intervenor:** Environmental Defense Fund | **For contribution to Decision (D.) 25-12-044** |
| **Claimed: $**13,061.50 | **Awarded:** $12,653.00 |
| **Assigned Commissioner:** Darcie L. Houck | **Assigned ALJ:** Camille Watts-Zagha |

## PART I: PROCEDURAL ISSUES

| | |
|---|---|
| **A. Brief description of Decision:** | Decision adopting metrics and methodologies for assessing the relative affordability of essential utility services. |

**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: | October 12, 2018 | Verified |
| 2. Other specified date for NOI: | See comment | Verified |
| 3. Date NOI filed: | February 17, 2022 | Verified. Pursuant to the instructions in the 1/18/2022 Scoping Memo, any customer who |

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

| | Intervenor | CPUC Verification |
|---|---|---|
| | | intends to seek an award of compensation must file and service a NOI within 30 days of issuance. |
| 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. 21-06-017 | Verified |
| 6. Date of ALJ ruling: | November 9, 2021 | Verified |
| 7. Based on another CPUC determination (specify): | N/A | |
| 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. 21-06-017 | Verified |
| 10. Date of ALJ ruling: | November 9, 2021 | Verified |
| 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. 25-12-044 | Verified |
| 14. Date of issuance of Final Order or Decision: | December 22, 2025 | Verified |
| 15. File date of compensation request: | 2/19/2025 | Verified |
| 16. Was the request for compensation timely? | | Yes |

### C. Additional Comments on Part I:

| # | Intervenor's Comment(s) | CPUC Discussion |
|---|---|---|
| 2/3 | A "customer who intends to seek an award of compensation must file and serve a notice of intent to claim | Verified. Pursuant to the instructions in the 1/18/2022 Scoping Memo, any customer who intends to seek an award of compensation must file and service a NOI within 30 days of |

| | | |
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| | compensation within 30 days after issuance of this scoping memo."<br><br>The NOI was filed by February 17, 2022, which is within 30 days after the issuance of the Scoping Memo on January 18, 2022. | issuance. EDF filed its NOI on 2/17/2022, which is within 30 days of the 1/18/2022 Scoping Memo. |
| 9/10 | In D.25-11-021, the CPUC found that EDF had demonstrated customer status and significant financial hardship. | Noted. D.25-11-021 granted substantial contribution to D.23-11-006 in the consolidated proceedings A.21-12-006 and A.21-12-008. |

## 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. EDF established record on Gas Ratemaking Strategies at the 2022 Affordability En Banc on Energy Costs and Rates from February 28, 2022 to March 1, 2022**<br><br>At the Commission's invitation to be en banc, EDF proposed ways the Commission could ensure affordability of existing infrastructure during the electrification transition. EDF stressed a clear path for the energy transition followed by targeted policy choices to ensure an affordable, clean and safe energy future. [2] | "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. The affordability metrics and the information gained through this proceeding helped inform the report provided to the Governor in response to Executive Order N-5-24 and will continue to inform the Commission's assessment of issues presented in proceedings consistent with this decision." (D. 25-12-044 at 73) | Verified |
| **2. The Decision Incorporates EDF's Suggestions on the** | The Decision incorporated EDF's suggestion to require utilities to include more contextual data alongside the | Verified |

[2] 2022 Affordability Rulemaking En Banc: Gas Ratemaking Strategies, https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/en-banc/colvin-slides---w-image-and-link-text.pdf

| | | |
|---|---|---|
| **Usefulness of the Affordability Framework**<br><br>EDF developed the record on this issue through comments reflected in the proceeding record and the final decision adopted by the Commission. EDF established that rates are unaffordable and argued that there are significant inaccuracies and gaps in the consideration of affordability, particularly in the calculations of gas affordability and the long-run ESJ and gas rate impacts of Commission decisions. (EDF comments at 4)<br><br>EDF provided comments to address gas rate and ESJ considerations in the Affordability Framework. (EDF comments at 2-4)<br><br>EDF recommended the Commission introduce revisions to the Affordability Framework that considers longer-term impacts of decarbonization programs from an affordability perspective. (EDF comments at 7) | metrics, which ultimately included tracking revenue requirement and rate changes against inflation (D. 25-12-044 at 30).While it did not adopt EDF's suggestions to introduce revisions to the Affordability Framework that considers longer-term impacts of decarbonization programs from an affordability perspective, the Commission rightfully acknowledged EDF's contribution and persuasion in the final Decision.<br><br>"Parties are concerned that 'without a discussion of how to act on affordability impacts, the Affordability Metrics will not advance the Commission's environmental and social justice goals.' Some parties [EDF] believe rates are unaffordable." (D. 25-12-044 at 22)<br><br>"Parties disagree on how to align affordability goals with statutory mandates for safe and reliable service… TURN and EDF both view the affordability framework as a means to identify the most vulnerable ESJ communities." (D. 25-12-044 at 22)<br><br>"EDF recommends that each gas utility discuss affordability impacts over a longer time horizon, correctly pointing out that the affordability metrics are a lagging indicator." (D. 25-12-044 at 24)<br><br>"EDF also argues that the Commission should address the dual risks of gas rates and stranded assets." (D. 25-12-044 at 26)<br><br>"The arguments presented by EDF, TURN and Joint Ratepayers were persuasive. These parties demonstrated that the revenue approvals associated with capital investments impact rates | |

| | | |
|---|---|---|
| | over long period of time, over decades." (D. 25-12-044 at 36)<br><br>"We are persuaded by parties arguing that more contextual data alongside the metrics will improve the usefulness of the metrics. While we have yet to determine an absolute threshold, parties recommend a common and understandable inflation trend to compare to revenue and rate trends." (D. 25-12-044 at 30) | |
| **3. The Decision Reflects EDF's Recommendations on the Usefulness of the Cost and Rate Trackers**<br><br>EDF identifies that demand figures in GRCs do not adjust for the downward trajectory of gas demand and recommends improvements to these shorter-term rates analysis (EDF comments at 4-5). | The Decision considered EDF's argument to direct utilities to use the gas demand projections submitted to the Commission in their most recent California Gas Report. The Commission did not rule on this matter, however, EDF developed the record on this matter. The Decision ultimately adopted the continuation of quarterly served Trackers to the docket of this proceeding.<br><br>"EDF argues that gas demand forecasts in GRCs and in the affordability metrics inadequately account for reductions in gas customers and increased demand for electricity brought about by decarbonization policies. EDF asserts that these inadequacies create significant challenges to planning for affordability impacts over the long term." (D. 25-12-044 at 48-49)<br><br>"The Trackers will continue to be served quarterly to the docket of this proceeding, and for the most part, publicly, as described below. To the degree that cumulative revenue, rate and bill impacts are within the scope of any individual proceedings, the Trackers provide relevant data that may be introduced as determined by the | Verified |

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|---|---|---|
| | assigned Commissioner or ALJ." (D. 25-12-044 at 50) | |

**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:** TURN, Joint Ratepayers | | Noted |
| **d. Intervenor's claim of non-duplication:** EDF did not confer with any other parties regarding this proceeding and overlap in contribution is minimal. EDF provided unique analysis and discussion that helped shape the eventual Decision, particularly in its examination of gas planning and gas rates in the context of future decarbonization. | | Noted |

## PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

| | CPUC Discussion |
|---|---|
| **a. Intervenor's claim of cost reasonableness:** EDF requests a total intervenor compensation claim of $13,061.50. This is reasonable given the scale of the proceeding and EDF's contributions to the Decision. | Noted |
| **b. Reasonableness of hours claimed:**<br><u>Attorney Time:</u><br><br>EDF devoted a total of approximately 12.7 hours of attorney time for work performed by EDF's attorney, Elizabeth Kelly. This is reasonable for the scale of the proceeding and range of issues presented in the proceeding.<br><br><u>Expert Time:</u><br><br>EDF contributed approximately 8.5 hours of expert time of Michael Colvin, EDF's Director of Regulatory and Legislative Affairs, California Energy Program. This is reasonable given EDF's contributions to the issues presented in the proceeding, as detailed in Part II.A. | Noted |

| | CPUC Discussion |
|---|---|
| | |
| **c. Allocation of hours by issue:**<br><br>Gas planning and analysis of affordability framework: 90% of time<br><br>Analysis on usefulness of cost and rate trackers: 10% of time | Noted. |

**B. Specific Claim:***

| CLAIMED | | | | | | CPUC AWARD | | |
|---|---|---|---|---|---|---|---|---|
| **ATTORNEY, EXPERT, AND ADVOCATE FEES** | | | | | | | | |
| **Item** | **Year** | **Hours** | **Rate $** | **Basis for Rate*** | **Total $** | **Hours** | **Rate $** | **Total $** |
| Elizabeth Kelly | 2022 | 9.4 | 570 | D.23-11-064 | 5,358.00 | 8.90 [1] | 570.00 [2,3] | $5,073.00 |
| Elizabeth Kelly | 2024 | 1.9 | 650 | D.25-09-025 | 1,235.00 | 1.90 | 650.00 [2,3] | $1,235.00 |
| Elizabeth Kelly | 2025 | 1.4 | 675 | Rate not yet set, but 2025 is a COLA-only year (3.46%) | 945.00 | 1.40 | 670.00 [2,3] | $938.00 |
| Michael Colvin | 2022 | 6 | 520 | D.25-09-025 | 3,120.00 | 6.00 | 505.00 [4] | $3,030.00 |
| Michael Colvin | 2024 | 2.5 | 595 | D.25-12-015 | 1,487.50 | 2.50 | 595.00 [4] | $1,487.50 |
| ***Subtotal: $12,145.50*** | | | | | | ***Subtotal: $11,763.50*** | | |
| **INTERVENOR COMPENSATION CLAIM PREPARATION **** | | | | | | | | |
| **Item** | **Year** | **Hours** | **Rate $** | **Basis for Rate*** | **Total $** | **Hours** | **Rate $** | **Total $** |
| Elizabeth Kelly | 2022 | 1.10 | 285 | 2022 rate set in D.23-11-064 divided by 2 | 313.50 | 1.10 | 285.00 [2,3] | $313.50 |
| Elizabeth Kelly | 2025 | .6 | 337.5 | Rate not yet set, but 2025 is a COLA-only year (3.46%) divided by 2 | 202.50 | 0.60 | 335.00 [2,3] | $201.00 |

| CLAIMED | | | | | | CPUC AWARD | | |
|---|---|---|---|---|---|---|---|---|
| Dominic Peters | 2026 | 2.5 | 160 | ½ of requested rate based on experience | 400.00 | 2.50 | 150.00 [5] | $375.00 |
| | | | | | ***Subtotal: $916.00*** | | | ***Subtotal: $889.50*** |
| | | | | | ***TOTAL REQUEST: $13,061.50*** | | | ***TOTAL AWARD: $12,653.00*** |

*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[3] | Member Number | Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation |
|---|---|---|---|
| Elizabeth Kelly | 12/28/2009 | 268401 | No |

**C. Attachments Documenting Specific Claim and Comments on Part III[4]:**

| Attachment or Comment # | Description/Comment |
|---|---|
| 1 | Certificate of Service |
| 2 | Resume of Elizabeth Kelly |
| 3 | Resume of Michael Colvin |
| 4 | Resume of Dominic Peters |
| 5 | Biography of Expert and Attorney<br><br>**Rate for Elizabeth Kelly, Attorney**<br><br>Ms. Kelly's legal energy experience (15+ years) and expert energy economics and rate design experience prior to becoming an attorney are set forth on her resume, Attachment B.<br><br>Above the midpoint of the range is appropriate for Ms. Kelly due to her |

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

[4] Attachments not included in final Decision.

| Attachment or Comment # | Description/Comment |
|---|---|
| | unique and extensive energy and regulatory experience, including:<br><br>• Her economics degree which allows for a greater degree of understanding of financial and technical matters before the Commission;<br><br>• Her experience in energy economic and rate design consulting which contributes to her substantive knowledge in energy;<br><br>• The extent and depth of her experience in energy and project finance transactions;<br><br>• Her experience in launching MCE, California's first Community Choice Aggregator, which required extensive legal and regulatory advocacy, in many cases without specific precedent before the California Public Utilities Commission;<br><br>• Her experience serving clients specifically before the California Public Utilities Commission; and<br><br>• Her service within energy and legal groups that have advanced her knowledge and experience, including:<br><br>o Founder of the San Francisco Women General Counsel Circle<br><br>o 2018 National Association of Women Lawyers General Counsel Institute, Member of Planning Committee and Workshops Subcommittee<br><br>o 2017 National Association of Women Lawyers General Counsel Institute, Member of Planning Committee, Workshops Subcommittee, and Logistics Subcommittee.<br><br>o 2016 CAISO Energy Imbalance Market Governing Body Nominating Committee, Public Interest and Consumer Advocate Committee Member<br><br>o 2015 CAISO Board of Governors Nominee Review Committee, End User and Retail Provider Committee Member<br><br>**Rate for Michael Colvin, Expert** |

| Attachment or Comment # | Description/Comment |
|---|---|
| | Michael Colvin spent over 10 years at the California Public Utilities Commission and another 6 at Environmental Defense Fund. Given his experience he is classified as public policy analyst V<br><br>**Rate for Dominic Peters, Expert**<br><br>Dominic Peters has worked as a Senior Analyst at Environmental Defense Fund for 5 months. He received a Master's in International Affairs from UC San Diego focused on energy policy and has more than 2 years of relevant professional policy analysis experience. Given his academic qualifications and professional experience, he is classified as a public policy analyst III |

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

<table>
<tr><th>Item</th><th>Reason</th></tr>
<tr><td>[1] Reduction of Hours for Elizabeth Kelly in 2022</td><td> <u>Excessive Hours</u> While these 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 to make a substantial contribution to the decision. In this instance, EDF failed to prove that. Accordingly, we have adjusted the entries below for a total reduction of 0.50 hours:
<table>
<tr><th>Date</th><th>Task</th><th>Action</th><th>Hours</th></tr>
<tr><td>7/26/2022</td><td>GP</td><td>Draft Comments on ALJ Ruling</td><td>1.20</td></tr>
<tr><td>7/27/2022</td><td>GP</td><td>Draft Comments on ALJ Ruling</td><td>1.70</td></tr>
<tr><td>7/31/2022</td><td>GP</td><td>Draft Comments on ALJ Ruling</td><td>0.30</td></tr>
</table></td></tr>
<tr><td>[2] Elizabeth Kelly 2022, 2024, 2025 Hourly Rate</td><td>EDF has confirmed that Elizabeth Kelly 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.[5] 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)).</td></tr>
</table>

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

| Item | Reason |
|---|---|
| | EDF has confirmed that per the terms of their contract, Elizabeth Kelly has been hired on a contingency rate basis, meaning that Elizabeth Kelly has agreed to defer the 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 Elizabeth Kelly's experience as an Legal - Attorney – V.<br><br>Given that the 2022 rate range for Legal - Attorney - V is \$506.38 to \$719.10, we find a 2022 hourly rate of \$570.00 to be reasonable and we adopt it here.<br><br>Given that the 2024 rate range for Legal - Attorney - V is \$560.95 to \$773.67, we find a 2024 hourly rate of \$650.00 to be reasonable and we adopt it here.<br><br>Given that the 2025 rate range for Legal - Attorney – V is \$584.51 to \$797.23, we find a 2025 hourly rate of \$670.00 to be reasonable and we adopt it here. We take ½ of Elizabeth Kelly's 2025 rate for an IComp preparation rate of \$335.00.<br><br>The award determined herein for Elizabeth Kelly's contribution in this proceeding shall be paid in full to Elizabeth Kelly, and no portion of this part of the award shall be kept by EDF. 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. |
| [3] 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.<br><br>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.<br><br>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 |

| Item | Reason |
|---|---|
| | 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. |
| [4] Michael Colvin 2022, 2024 Hourly Rate | D.24-05-026 approved the 2022 hourly rate of $505 for Michael Colvin as an Expert - Public Policy Analyst - IV.<br><br>D.25-12-013 approved the 2024 hourly rate of $595 for Michael Colvin as an Expert - Public Policy Analyst - V. |
| [5] Dominic Peters 2026 Hourly Rate | EDF requested a 2026 hourly rate of $320.00 as an Expert – Public Policy Analyst – III for Dominic Peters. Review of the submitted documents reflect 2+ years of relevant experience plus a master's degree in international affairs equivalent to 4 years of relevant experience as of 2026, qualifying him as an Expert – Public Policy Analyst – III. The corresponding 2026 hourly rate range is $297.91 - $503.43, placing EDF's requested rate within the valid range. We find the requested rate of $300.00 as an Expert – Public Policy Analyst – III reasonable and adopt it here. We take ½ of Dominic Peters's 2026 rate for an IComp preparation rate of $150.00. |

**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. Environmental Defense Fund has made a substantial contribution to D.25-12-044.

2. The requested hourly rates for Environmental Defense Fund's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services and/or reflect the actual rates billed to, and paid by Environmental Defense Fund, 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 $12,653.00.

## CONCLUSION OF LAW

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

## ORDER

1. Environmental Defense Fund is awarded $12,653.00.

2. Within 30 days of the effective date of this decision, the California Public Utilities Commission shall pay Environmental Defense Fund 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 5, 2026, the 75th day after the filing of Environmental Defense Fund'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:** | D2608023 | **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 |
|---|---|---|---|---|---|
| Environmental Defense Fund | 2/19/2026 | $13,061.50 | $12,653.00 | 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 |
|---|---|---|---|---|---|
| Elizabeth | Kelly | Attorney[6] | 570 | 2022 | $570 |
| Elizabeth | Kelly | Attorney | 650 | 2024 | $650 |
| Elizabeth | Kelly | Attorney | 675 | 2025 | $670 |
| Michael | Colvin | Expert | 520 | 2022 | $505 |
| Michael | Colvin | Expert | 595 | 2024 | $595 |
| Dominic | Peters | Expert | 320 | 2026 | $300 |

**(END OF APPENDIX)**

[6] Kelly serves as a consultant to EDF