Decision 26-08-032 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.	R.18-07-006 (Filed July 12, 2018)

DECISION GRANTING COMPENSATION TO UTILITY CONSUMER'S ACTION NETWORK FOR SUBSTANTIAL CONTRIBUTIONS TO DECISION (D.) 25-12-044 AND D.22-08-023

Intervenor: Utility Consumers' Action Network	**For contribution to Decision (D.) 25-12-044, D.22-08-023**
Claimed: $110,532.50	**Awarded:** $93,027.26
Assigned Commissioner: Darcie L. Houck	**Assigned ALJ:** Camille Watts-Zagha

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	**D.22-08-023** directs when and how the affordability framework will be applied in Commission energy, water and communications proceedings and further develops the tools and methodologies used to calculate the three previously adopted affordability metrics (see D.20-07-032). **D.25-12-044** makes several adjustments to the Commission's affordability framework to enhance its consideration of affordability issues for essential utility services and closes the proceeding.

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

Description	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:		

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

Description	Intervenor	CPUC Verification
3. Date NOI filed:	November 8, 2018	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.18-07-006	Verified
6. Date of ALJ ruling:	May 30, 2019 [2]	Verified
7. Based on another CPUC determination (specify):	See also: D.21-08-015 [3]	D.21-08-015 previously granted UCAN compensation in this proceeding.
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.18-07-006	Verified
10. Date of ALJ ruling:	May 30, 2019 [4]	Verified
11. Based on another CPUC determination (specify):	See also: D.21-08-015 [5]	D.21-08-015 previously granted UCAN compensation in this proceeding.
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:	12/22/2025	Verified
15. File date of compensation request:	2/20/2026	Verified
16. Was the request for compensation timely?		Yes

[2] Ruling: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M296/K319/296319049.PDF
[3] D.21-08-015, p. 2, https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M398/K319/398319718.PDF
[4] Ruling: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M296/K319/296319049.PDF
[5] D.21-08-015, p. 2, https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M398/K319/398319718.PDF

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
	UCAN is requesting compensation for hours and work contributing to the two decisions listed above. UCAN previously filed an intervenor compensation claim for D.20-07-032 and has received compensation. The work and hours listed in this claim do not include hours already compensated in the previous claim.	Noted D.21-08-015 granted UCAN compensation for substantial contribution to D.20-07-032.

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
<u>D.22-08-023: Issues</u>		Verified.
1. Affordability Ratio (AR) Calculator		
Parties examined the inputs and metrics in the AR Calculator offering additions or adaptations. UCAN argued that including certain data regarding disconnections in the AR Calculator would provide "an accurate metric to determine how a proposed increase in rates [would] affect the state's most economically vulnerable communities."	Opening Comments of UCAN on Staff Proposal on Implementation of Affordability Metrics (UCAN Comments on Staff Proposal), at 1-4.	
The decision cited to UCAN's argument and concerns.	D.22-08-023 at 20.	
The Commission noted that some disconnection data are reported by IOUs in	D.22-08-023 at 20, fn. 51.	

Rulemaking 18-07-005. While not including UCAN's recommendation to include additional disconnection data in this decision, the decision acknowledged that refinements to the affordability framework are ongoing and will continue over time. UCAN contributed valuable information and insight for the record and believes that during the ongoing assessment period it could be determined that disconnection data is helpful to decision makers.	*"Conforming to the standardized format of the affordability framework requires ongoing, methodical consideration of technical tools developed in this phase, Phase 2, of the proceeding…adhering to a standardized presentation of affordability impacts is still novel and will require review and refinement over time."* D.22-08-023 at 16.	
2. Input: Income and Housing Costs From U.S. Census Bureau UCAN recommended that sewer and wastewater charges should be included in the utility costs used to determine the calculation of resource level for the Affordability Ratio. UCAN argued, "The Commission should recognize that utility services or utility-like services encompass expenses beyond those traditional regulated by the Commission." The decision cited to UCAN's argument and concerns. The Commission disagreed with UCAN's recommendation. The Commission went on to clarify that taxes (argued by	UCAN Comments on Staff Proposal at 4-5. D.22-08-023 at 26, and see fn. 71, citing to UCAN Opening Comments at 6. *"There is no indication that sewer and wastewater charges are a significant factor worth including."* D.22-08-023 at 26.	Verified.

TURN) were likely more significant, acknowledging that taxes are not currently included in the calculation of the AR, they could be in Phase 3 of this proceeding. While not adopting UCAN's recommendation, UCAN did help the Commission clarify and distinguish its position on current variables in the AR calculation and their significance. Additionally, as noted above, review and refinement of the affordability framework is ongoing over time. UCAN's contribution to the record of this proceeding could be re-visited and re-evaluated during this ongoing review.	D.22-08-023 at 26.	
3. Water Tracker UCAN agreed with concerns expressed by the IOUs at the November/December 2021 working sessions regarding the "burden associated with modifying inputs into the rate tracker tool for every advice letter, water revenue adjustment mechanism, or other non-general rate case proceeding that may affect customer rates." The decision cited to the agreement parties discussed at the working sessions. While UCAN recommended updating the rate tracker twice a year, the Commission agreed that rather than submission in	UCAN Comments on Staff Proposal at 8. D.22-08-023 at 39, and see fn. 104, citing to UCAN Opening Comments at 8. D.22-08-023 at 40.	Verified.

quarterly proceedings as recommended in the Implementation Staff Proposal, water utilities should update and submit their Water Tracker quarterly. UCAN's participation in the working sessions and highlighting that additional tracking requirements could result in higher rates helped the Commission make its final determination regarding updates to the water tracker.		
4. Affordability Metrics in Water Applications In determining affordability metrics in water utility filings, UCAN recommended that the smaller Class A water companies should be required to "examine the cost of water offered by the nearest public or municipal provider." The final decision noted UCAN's recommendation. While noting UCAN's recommendation, the Commission clarified that comparisons to municipal water providers would be unworkable due to the burden of having to manually input the data causing an increase in the likelihood of error. The decision found it unnecessary for Class A water utilities to make comparisons and display trends in water affordability in individual proceedings.	UCAN Comments on Staff Proposal at 7. D.22-08-023 at 62, and see fn. 172, citing to UCAN Opening Comments at 7. D.22-08-023 at 62-63.	Verified.

UCAN opposed this finding and recommended modifying Findings of Fact 5 and 6, Conclusions of Law and Ordering Paragraphs 1 and 2 to help better track the 86% of water customers served by public agencies. While not adopting UCAN's recommendations in the final decision, UCAN believes it contributed to the record by helping the Commission clarify its final position on requirements for water utilities in their applications.	See UCAN Comments on Proposed Decision at 3-5.	
5. Informing Communications Resources UCAN recommended that it was highly appropriate and necessary to monitor implementation of the California Advanced Services Fund to ensure that "high speed digital access to the internet becomes as ubiquitous as dial tone was at the beginning of the 21st Century." The decision noted UCAN's position. The Commission agreed with UCAN and other parties and required that the affordability metrics be considered in both the CASF and Broadband for All proceedings.	UCAN Comments on Staff Proposal at 9-10. D.22-08-023 at 67. D.22-08-023 at 68.	Verified.
<u>End of D.22-08-023 Contributions</u>		

<table>
<tr><td colspan="2"><u>D.25-12-044:</u>

These are the UCAN documents referenced in UCAN's contributions described in the following rows regarding D.25-12-044 issues.

<u>UCAN 01:</u>
Comments on Ruling Questions,
dated November 30, 2022

<u>UCAN 02:</u>
Comments on Affordability Framework,
dated January 25, 2024

<u>UCAN 03:</u>
Reply Comments on Affordability Framework,
dated February 16, 2024

<u>UCAN 04:</u>
Comments on PD,
dated December 3, 2025

<u>UCAN 05:</u>
Reply Comments on PD,
dated December 8, 2025</td><td></td></tr>
<tr><td>Issue:
Affordability Framework Usefulness</td><td></td><td></td></tr>
<tr><td>UCAN noted that SDG&E/SoCalGas's claims regarding the record were inaccurate and cited to numerous UCAN contributions to the record. For example, UCAN asked that the Commission use graphical comparisons to provide the proper context to improve the usefulness of affordability metrics.
UCAN 05, pp. 2-3</td><td>The Commission agreed with UCAN.

"SDG&E/SoCalGas oppose the characterization to provide "additional context" in the form of graphical displays of revenue and rate trends, broken down by capital expenses and all other expenses, as required below, claiming these requirements are outside of scope and without record. The SDG&E/SoCalGas claims are faulty as a review of the record shows. We are persuaded by parties arguing that more contextual data alongside the metrics will improve the usefulness of the metrics."
D.25-12-044, p. 30</td><td>Verified.</td></tr>
</table>

UCAN recommended an affordability threshold (i.e., a high energy burden as previously defined by the Commission, or as a fixed dollar amount), **UCAN 02, pp. 8-15,** **UCAN 03, pp. 2-3,** …extensively discussed economic inflation and rate inflation, … **UCAN 01, p. 5-7,** **UCAN 02, pp. 2-3,** **UCAN 02, p. 6,** **UCAN 02, p. 17,** **UCAN 03, pp. 2-3,** **UCAN 04, p. 5,** **UCAN 04, p. 8-11,** **UCAN 05, p. 2-3,** …and recommended that the Commission require the IOUs to compare rates to inflation. **UCAN 01, p. 5,** **UCAN 04, p. 8-11,** **UCAN 05, pp. 2-3.**	The Commission adopted UCAN's recommendation to give a proper context to rate increases by comparing them to overall inflation. "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, p. 30**	Verified.
UCAN requested that the Commission require utilities to provide affordability metrics across a wide range of proceedings but highlighted some proceedings where metrics are not needed. **UCAN 01, pp. 7-8.**	The Commission's nuanced approach generally aligns with UCAN's recommendation. "This does not mean that the utilities are relieved from providing such information in other proceedings not required by this decision. …we require all investor-owned energy utilities to supply more context alongside the metrics. We determine that tracking revenue requirement and rate changes against inflation is appropriate context to require with affordability metrics, when affordability metrics are required in GRC Phase 1 applications, or when an assigned Commissioner or ALJ requires the utility to submit metrics in a	Verified.

	specific proceeding." **D.25-12-044, pp. 30-31**	
UCAN supported the affordability framework's metrics that support disadvantaged customer groups: "The affordability framework can be used to concentrate the Commission's efforts to achieve is social justice goals since it contains specific geographic data on neighborhoods in peril of a high rate of service terminations…" **UCAN 02, p. 7.** UCAN proposed that the AR20 metrics be compared to both minimum wage hours and Areas of Affordability Concern (see tables). **UCAN 02, pp. 14-15.**	The Commission's decision aligned with UCAN's recommendations by requiring disadvantage customer metrics. "The investor-owned energy utilities are required to also highlight the metrics of disadvantaged customer groups as recommended in the 2021/2022 annual Affordability Report." **D.25-12-044, p. 31**	Verified.
UCAN requested that the Commission require context for the affordability metrics because the affordability metrics are not readily understandable. "UCAN has concerns that the annual affordability report ("AAR") will be challenging for decision makers to understand much less make effective use of. For that reason, the metrics from the AAR and the data behind the AAR need to be summarized in a clear and straight forward manner in any utility proposal	The Commission agreed with UCAN. "This decision requires a comparison of basic trends of revenue and rate changes to inflation whenever the utilities are required to submit affordability metrics in order to compare the rate and bill implications of utility requests to a common, understandable benchmark. An understandable benchmark is needed to help parties and decisionmakers have more context around relative changes in affordability, as suggested by parties." **D.25-12-044, p. 31**	Verified.

that would increase customers' costs." **UCAN 02, p. 8.** "The challenge is for CBOs, utility service representatives, and Commission decisionmakers is to understand the meaning of the AR figures and how to best incorporate the information into the decision-making process." **UCAN 02, p. 18.** "While the affordability framework provides a wealth of detail about utility rates, it is not readily accessible to the lay public." **UCAN 03, p. 3.** "Presenting graphical information comparing utility rates to the CPI will assist the public in understanding the outcomes of the Commission's various and complex processes of setting revenue requirements." **UCAN 05, p. 3.**		
UCAN recommended that the Commission expand affordability metrics beyond residential customers. **UCAN 01, p. 3.** **UCAN 04, p. 6-7.**	The Commission agreed with UCAN. "We 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." **D.25-12-044, p. 43**	Verified.
UCAN highlighted the need for context and plain language so that decisionmakers and	The Commission agreed with UCAN. "Some parties request that the annual	Verified.

ratepayers can better understand the affordability metrics. **UCAN 02, p. 8.** **UCAN 02, p. 18.** **UCAN 03, p. 3.**	Affordability Reports include different types of analysis, discuss affordability impacts in plain language, and explain how the Commission employs the affordability metrics in its considerations. [citing UCAN among others]… We agree with parties that the annual Affordability Report is useful but that the presentation of information can be improved. … we recognize the need for simplicity and clarity called for by many parties...” **D.25-12-044, pp. 44-45** “We require more context to be included with the filing of updated affordability metrics in individual proceedings, to generate more robust analysis of the affordability metrics.” **D.25-12-044, pp. 73-74**	
Issue: **Usefulness of the Cost and Rate Trackers**		
UCAN supported continued use of rate trackers. **UCAN 02, p. 18,** **UCAN 03, p. 10-11.**	The Commission agreed with UCAN. “Trackers provide valuable and timely information into the cumulative effects of all Commission approvals… The Trackers will continue to be served quarterly to the docket of this proceeding,… 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 assigned Commissioner or ALJ.” **D.25-12-044, p. 50**	Verified.
UCAN recommended that the Commission require utilities to include affordability metrics in several proceeding types. **UCAN 01, pp. 7-8.**	The Commission agreed with UCAN. “Affordability issues merit inclusion across a wide range of proceedings, including GRCs, and analysis of those issues will benefit from utilization of the	Verified.

	metrics developed in this proceeding." **D.25-12-044, p. 74**	
Regarding usefulness of cost and rate trackers, UCAN recommended that the Commission expand affordability metrics beyond residential customers. **UCAN 01, p. 3.** **UCAN 04, p. 6-7.**	The Commission agreed with UCAN. "Moreover, while the metrics developed in this proceeding will help advance consideration of affordability in an objective and data-driven manner, we also recognize that additional work may be appropriate to understand the specific affordability challenges affecting different customers, such as nonresidential customers, which should be considered in the context of future proceedings, including GRCs." **D.25-12-044, p. 74**	Verified.
UCAN stated that it "strongly supports these updates to affordability tracking which include (1) increasing access to the affordability metrics by making all metrics and data available through the Commission's website…" **UCAN 04, p. 1.** "…UCAN supports the increased availability of data and metrics on the Commission's website…" **UCAN 04, p. 11.**	The Commission will make the affordability metrics available on the CPUC website. "For efficiency, flexibility and transparency, we transition the production of the affordability metrics, maps, and analysis from a static annual report to the Commission's affordability webpages." **D.25-12-044, p. 74**	Verified.
UCAN supported continued use of rate trackers. **UCAN 02, p. 18,** **UCAN 03, p. 10-11.**	The Commission agreed with UCAN. "We affirm the prior order in this proceeding to require public release of the Trackers for electric, gas and Class A water utilities and eliminate the option to provide a summarized report." **D.25-12-044, p. 74**	Verified.
UCAN opposed use of system average rates: "What does not follow is SCE's proposed remedy for	The Commission agreed with UCAN. "We find SCE's recommendation to change the rate trend data from Residential Average Rates to System	Verified.

capital expenditures to use system average rates to track how utility rates are changing over time. No class of utility customers pays system average rates… Since this rulemaking is dedicated to examining how affordability issues are affecting residential customers, using a system average rate methodology for comparing customer rates to the CPI would be inaccurate and would fail to track actual customer bills." **UCAN 05, pp. 3-4.**	Average Rates inappropriate because the affordability framework has been developed for residential affordability." **D.25-12-044, p. 76**	
UCAN expressed support for continued development of affordability metrics beyond residential customers so that future affordability metrics are available for small business/commercial customers class and other customer classes. **UCAN 01, p. 3** **UCAN 04, pp. 6-7.**	The Commission's decision acknowledged the importance of non-residential affordability metrics in alignment with UCAN's position. "[W]e agree that affordability for non-residential customer classes is important and deserves attention. We further explain that while the metrics developed do not translate to non-residential classes for the reasons described in Section 3.3.4, the concepts of the affordability framework may provide guidance when addressing small commercial and other non-residential customer classes in other proceedings. Additionally, 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, which is a result of Commission staff having worked cooperatively with IOUs to develop the function of converting revenue changes into bills for small commercial customers." **D.25-12-044, p. 77**	Verified.

UCAN supported Commission orders instead of broad delegation: “UCAN is also concerned about this apparent delegation of authority and believes that a better approach would be to continue this affordability rulemaking in another format… Simply delegating affordability issues to the Energy Division is inappropriate and an improper delegation of Commission authority to one of its operational divisions. Affordability concerns about customer rates are long standing and will continue to be so. However, the proper approach is to continue the affordability review process in a follow-on proceeding.” **UCAN 05, p. 2.**	The Commission agreed with UCAN. “Additional revisions are made to 1) remove the delegation of authority to Energy Division to revise the newly required graphical information, as it is too broad and not aligned with prior delegations, especially given that this proceeding is closing.” **D.25-12-044, p. 77**	Verified.
Issue: **Impacts on Environmental and Social Justice (ESJ) Communities**		
UCAN supported the use of Areas of Affordability Concern (“AAC”) data. The decision addressed AACs as the main topic of the ESJ issue. “[In response to ruling questions on AAC:] Yes. Affordability is statutorily and necessarily a key component of the Commission’s overall responsibility as a rate-setting agency.” **UCAN 02, p. 19.**	The Commission agreed with UCAN. “AACs are one of several methods of identifying where to find and how to address the needs of the most vulnerable communities and ESJ communities… Use of AACs will remain part of the analytic toolbox available to stakeholders and may help identify whether ESJ communities are being disproportionally impacted.” **D.25-12-044, p. 61**	Verified.

"Yes, the AAC areas should be of great concern to the Commission, and so should every other PUMA where AR20 customers are living under the stress of a high energy burden." **UCAN 03, pp. 9-10.** "UCAN strongly supports these updates to affordability tracking which include… (4) continued use of areas of affordability concern ("AAC") metrics." **UCAN 04, p. 1.**		

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

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?[6]	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: CforAT and TURN		Noted.
d. Intervenor's claim of non-duplication: <u>D.22-08-023</u>: UCAN uniquely noted the importance of both municipal water, sewer, and wastewater charges on household budgets in assessing the affordability of utility services in California. UCAN also noted that although the Commission does not regulate municipal water rates, 86% of California residential customers receive their water from municipal providers. While not adopting UCAN's position, the decision noted UCAN's unique contribution. UCAN also uniquely discussed disconnection data, also noted and discussed, but not adopted in the final decision. These are examples of UCAN providing distinctive contributions in this proceeding and contributing to the Commissions discussions and final decisions on multiple topics. While some		Noted.

[6] The Office of Ratepayer Advocates was renamed the Public Advocate's Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

contributions were similar to other parties (i.e. include affordability metrics in communication proceedings), UCAN was able to provide the Commission with helpful analyses and recommendations to clarify and determine its final positions. D.25-12-044: UCAN is the only consumer advocate representing the interests of San Diego Gas and Electric residential ratepayers that provided comments to the Commission on the issues in this Affordability proceeding (the other intervenors are in the Bay Area). In this decision, UCAN made several unique contributions. For example, UCAN detailed the need for graphic representations of inflation versus rate increases. UCAN provided the Commission with several examples of graphic (i.e., charts and graphs) contextual examples to highlight the importance and impact of contextual illustrations. UCAN also corrected the utilities' mistaken assertion that graphic representation of inflation versus rates was missing from the record of the proceeding. UCAN coordinates with other intervenors when reasonable and to support efficiency, often during workshops or by reading other parties' comments. This awareness of other parties' positions enables UCAN and other parties to minimize duplicative work and analyses. UCAN urges the Commission to find that its participation avoided undue duplication and to ensure that, to the extent duplication occurred, it served to supplement, complement, or contribute to the showing of the other intervenors.	

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: UCAN has been an active party in all phases of this rulemaking since its inception in 2018. UCAN has participated in workshops, submitted comments on proposed decisions and responses to a series of questions posed by the presiding administrative law judge. UCAN used a single attorney and a single expert in this proceeding. In doing so, UCAN was able to utilize team member coordination (see timesheet) thereby maximizing its ability to efficiently address the issues within the proceeding. Consequently, UCAN efficiently argued the merits of affordability and the need for clear and contextualized affordability metrics. While unable to provide an exact savings figure to ratepayers for its participation, UCAN believes its contribution, as described in Part II (A)	Noted.

	CPUC Discussion
above, directly benefited ratepayers by providing thoughtful and meaningful refinements to affordability metrics that will illuminate when costs are exceeding what ratepayers can afford. UCAN's contribution will help tackle the ongoing affordability crisis by providing the Commission with further refined tools to determine when rate increases exceed affordability ranges for ratepayers. UCAN's participation enhanced the record for future reference in the ongoing reviews of the affordability metrics, thereby giving a continuing voice to ratepayers on the issues of affordability.	
b. Reasonableness of hours claimed: UCAN strategically researched and commented on issues on which the Commission requested feedback. UCAN further restricted itself to sub-issues that are within its expertise and mostly to issues that affect residential customers. UCAN spent a conservative number of hours on the issues in the proceeding by utilizing one attorney and one expert to examine the issues. UCAN further divided work on filings into sections so as each person could work and write about the issues under their strengths and complement each other's contributions (see discussions in timesheet entries among attorney and expert, especially for D.25-12-044.) <u>Additional timesheet explanations:</u> For D.22-08-023, UCAN identified five issues for substantial contribution (see Part II (A) above). UCAN also utilized the additional categories of Identifying Issues (II) and Preparing and Presenting (PP) to capture tasks such as reading Rulings and identifying issues as well as spending time preparing a motion and beginning comments on the Staff Proposal or Proposed Decision. For D.25-12-044, UCAN listed three issue areas which were identified by the decision (see Part II (A) above). UCAN is also noticing that due to recent requests for more detailed time entries and breaking out tasks along with identifying more specific issues, the intervenor compensations claims and timesheets are taking more hours to prepare. UCAN is not opposed to these requests and is doing its best to follow and fulfill any requirements, and urges the Commission to find the additional time needed to produce intervenor compensation requests reasonable and not excessive.	Noted.
c. D.25-12-044 - Allocation of hours by issue:	Noted.

	CPUC Discussion
<table><tr><th>Issue</th><th>Hours</th><th>Percentage</th></tr><tr><td>**D.22-08-023**</td><td></td><td></td></tr><tr><td>Affordability Metrics in Water Applications</td><td>6.25</td><td>9%</td></tr><tr><td>Affordability Ratio (AR) Calculator</td><td>14.25</td><td>21%</td></tr><tr><td>Identifying Issues</td><td>18.50</td><td>28%</td></tr><tr><td>Informing Communications Resources</td><td>5.50</td><td>8%</td></tr><tr><td>Input: Income & Housing Costs</td><td>5.50</td><td>8%</td></tr><tr><td>Preparing and Presenting</td><td>8</td><td>12%</td></tr><tr><td>Water Tracker</td><td>9</td><td>13%</td></tr><tr><td>**D.25-12-044**</td><td></td><td></td></tr><tr><td>Affordability Framework Usefulness</td><td>72.15</td><td>63%</td></tr><tr><td>Usefulness of the Cost and Rate Trackers</td><td>27.00</td><td>23%</td></tr><tr><td>Impacts on ESJ Communities</td><td>15.80</td><td>14%</td></tr></table>	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Jason Zeller	2020	5	$410	D.19-11-014	$2,050.00	4.00 [1]	$410 [2]	$1,640.00
Jason Zeller	2021	25.50	$700	D.23-07-013	$17.850.00 [3]	19.50 [4]	$700 [2]	$13,650.00
Jason Zeller	2022	41	$725	D.24-05-016	$29,725.00	37.50 [5]	$715 [2]	$26,812.50
Jason Zeller	2024	28.25	$770	D.25-12-039 [7]	$21,752.50	28.25	$770 [2]	$21,752.50
Jason Zeller	2025	9	$795	D.25-12-039 [8]	$7,155.00	6.00 [6]	$795 [2]	$4,770.00
Jane Krikorian	2021	2	$350	D.21-12-050	$700.00	2.00	$350 [7]	$700.00

[7] https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M591/K808/591808684.PDF
[8] *Ibid.*

CLAIMED						CPUC AWARD		
Tyson Siegele	2024	45.3	$345	D.25-12-014 [9]	$15,628.50	39.30 [8]	$345 [9,10]	$13,558.50
Tyson Siegele	2025	25.9	$360	D.25-12-014 [10]	$9,324.00	19.90 [11]	$355 [9,10]	$7,064.50
					Subtotal: $104,185.00			***Subtotal: $89,948.00***
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Tyson Siegele	2026	12.3	$187.50	1/2 2026 Rate Request See Comme 3	$2,306.25	6.15 [12]	$182.50 [9,10]	$1,122.38
Jason Zeller	2026	4	$410	1/2 2026 Rate Request See Comme 1	$1,640.00	2 [12]	$410 [13]	$820.00
Jane Krikorian	2026	8.50	$282.50	1/2 2026 Rate Request See Comme 2	$2,401.25	4.25 [12]	267.50 [14]	$1,136.88
					Subtotal: $6,347.50			***Subtotal: $3,079.26***
					TOTAL REQUEST: $110,532.50			***TOTAL AWARD: $93,027.26***

*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[11]**	**Member Number**	**Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation**
Jason Zeller	March 21, 1989	139577[12] [15]	No

[9] https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M590/K650/590650560.PDF
[10] *Ibid.*
[11] This information may be obtained through the State Bar of California's website at https://apps.calbar.ca.gov/attorney/LicenseeSearch/QuickSearch.

[12] Typographic error: Correct member number is 139477.

CLAIMED			CPUC AWARD
Jane Krikorian	January 3, 2025	359865	No

C. Attachments Documenting Specific Claim and Comments on Part III[13]:

Attachment or Comment #	Description/Comment
1	Certificate of Service
Comment 1 COLA Increase for Jason Zeller	**2026:** UCAN requests a 2026 rate for Mr. Zeller of $820. This rate is derived by applying the proper escalation rates of 3.35% for 2026, as published by the Commission in the 2026 version of the hourly rate chart for intervenor compensation (see https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/administrative-law-judge-division/documents/icomp-materials/hourlyratechart-02102026.xlsm). The resulting 2026 rate is $821.63 rounded up to the nearest $5, equals $825. However that exceeds the hourly rate range for Mr. Zeller's rate category according to the Market Rate Study. Thus, UCAN limits the rate request for Mr. Zeller's 2026 rate to $820.
Comment 2 Rate Request for Jane Krikorian	**Request for 2025 Hourly Rate Pursuant to Resolution ALJ-393** **UCAN Representative**: Jane Krikorian **Labor Role:** Legal – Attorney **Level:** III (5-10 yrs experience) **2025 Hourly Rate Range (estimated):** $379 - $589 **Requested Hourly Rate:** $545 UCAN requests a new rate for Ms. Jane Krikorian in the Attorney category based on her recent admittance to the California Bar in January 2025. Ms. Krikorian's previous categorization was set in 2021 per D.21-12-050 as an Expert: Public Policy Analyst, Level III. Due to Ms. Krikorian's legal experience and years practicing before the Commission, UCAN requests Ms. Krikorian be placed in the Attorney category also at Level III. Ms. Krikorian has 17 years of legal experience, with the past 11 years at UCAN steadily increasing her responsibilities and practice experience before the Commission. Prior to joining UCAN and after receiving her Juris Doctorate in 2010, Ms. Krikorian spent several years as a law clerk at the Legal Aid Society of San Diego assisting in the administrative law areas of the Internal Revenue Service (IRS) and Social Security Administration (SSA). While in law school at California Western

[13] Attachments are not included in the final decision.

Attachment or Comment #	Description/Comment
	School of Law, Ms. Krikorian gained extensive legal research experience working as a law clerk for constitutional law professor Michael R. Belknap (2008-2010). In February 2014, Ms. Krikorian was hired at UCAN. Since then, she has increased her responsibilities and practice experience before the Commission. This includes increased involvement in UCAN's overall advocacy strategies and efforts to contain the increasing costs of electricity on behalf of ratepayers. Ms. Krikorian has helped develop UCAN's legal and policy positions in numerous energy-related proceedings including Integrated Resource Planning, Power Charge Indifference Adjustment, Transportation Electrification, and more recently the Rulemaking to Advance Demand Flexibility through Electric Rates and the Rulemaking to Modernize the Electric Grid for a High Distributed Energy Resources Future. Ms. Krikorian has been involved in several General Rate Cases and Cost-of-Capital proceedings. Ms. Krikorian's involvement in proceedings includes working with expert consultants and witnesses to develop and file testimony, preparing for evidentiary hearings and cross-examining witnesses, writing briefs and submitting comments on Commission rulings and proposed decisions. Ms. Krikorian continues to develop her expertise at the Commission with her recent involvement in proceedings on safety, reliability and ratesetting. The Market Rate Study Hourly Rate Chart lists that an Attorney in Level III should have a JD or equivalent degree, 5-10 years of experience, and be licensed to practice law. It also notes that, "Higher experience levels should have experience with areas of law and procedures relevant to CPUC matters…" Due to Ms. Krikorian's 11 years at UCAN and relevant experience of practicing in front of the Commission, her JD and recent admittance to the CA State Bar, UCAN requests Ms. Krikorian's rate be established at $545 which should be between the Median Range and High Range for 2025. UCAN believes this is a just and reasonable rate based on the parameters of the Market Rate Study for an Attorney Level III and Ms. Krikorian's education, higher experience level and recent admittance to the California State Bar. UCAN appreciates the Commission's consideration of this request for Ms. Krikorian. **Rate Request for 2026:** UCAN requests a 2026 rate for Ms. Krikorian of $565. This rate is derived by applying the proper escalation rates of 3.35% for 2026, as published by the Commission in the 2026 version of the hourly rate chart for intervenor compensation (see https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/administrative-law-judge-division/documents/icomp-materials/hourlyratechart-02102026.xlsm). The resulting 2026 rate is $563.25 rounded up to the nearest $5, equals $565. [$545 x 1.0335 = $563.25 rounded up to the nearest $5 increment = $565].

Attachment or Comment #	Description/Comment
Comment 3 COLA Increase Request for UCAN's Expert Tyson Siegele	**Tyson Siegele Hourly Rate Justification** Mr. Siegele has been recognized as an expert before the Commission in numerous proceedings. See below for Commission-approved rates for 2024 and 2025. In this request, UCAN requests a 2026 rate of $375 for Mr. Siegele. See below for the rate calculation. **2024:** CPUC-approved rate for Mr. Siegele, $345 in D.24-11-021: https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M546/K024/546024533.PDF **2025:** CPUC-approved rate for Mr. Siegele, $360 in D.25-12-014: https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M590/K650/590650560.PDF **2026:** UCAN requests a 2026 rate for Mr. Siegele of $375. This rate is derived by applying the proper escalation rates of 3.35% for 2026, as published by the Commission in the 2026 version of the hourly rate chart for intervenor compensation (see https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/administrative-law-judge-division/documents/icomp-materials/hourlyratechart-02102026.xlsm). The resulting 2026 rate is $372.06 rounded up to the nearest $5, equals $375. [$360 x 1.0335 = $372.06 rounded up to the nearest $5 increment = $375].

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Reduction of Hours for Jason Zeller in 2020	*Excessive Hours* 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, while preparing a response in support of the Public Advocate Office's motion was a compensable activity, UCAN did not demonstrate that the full 3.00 hours claimed were reasonably necessary. The response consists of only 4 pages and primarily supports the motion without extensive factual or legal analysis. Accordingly, we reduce 1.00 hour from the following entries: **Date** / **Task** / **Hours** 9/16/2020 / Prepare Response in Support of Public Advocate's Motion later granted by the ALJ on Oct. 21, 2020 / 3.00

<table>
<tr><th>Item</th><th>Reason</th></tr>
<tr><td>[2]
2020-2022,
2024-2025
Jason Zeller
Hourly Rate</td><td>D.23-07-013 approved the 2020 hourly rate of $410 for Jason Zeller, we find the hourly rate reasonable and adopt it here.

D.23-07-013 approved the 2021 hourly rate of $700 for Jason Zeller, we find the hourly rate reasonable and adopt it here.

Pursuant to D.25-06-028, D.24-05-016 previous verified a 2022 rate of $725 for Mr. Zeller as a Legal – Attorney – V. However, according to the Hourly Rate Chart approved in Resolution ALJ-393, the maximum approved rate for 2022 is $719.10, for which the previous adopted rate exceeds. Considering this, we will correct Mr. Zeller's 2022 rate by taking the maximum approved rate of $719.10 and rounding down to the nearest $5. As a result, D.25-06-028 corrected and approved the 2022 hourly rate of $715 for Jason Zeller, we find the hourly rate reasonable and adopt it here.

D.25-12-039 approved the 2024 hourly rate of $770 for Jason Zeller, we find the hourly rate reasonable and adopt it here.

D.25-12-039 approved the 2025 hourly rate of $795 for Jason Zeller, we find the hourly rate reasonable and adopt it here.</td></tr>
<tr><td>[3]
Typographical
Error</td><td>Requested total here contains a typo, a comma should replace the period to separate the thousands. The correct total amount should be labeled as $17,850.00.</td></tr>
<tr><td>[4]
Reduction of
Hours for
Jason Zeller
in 2021</td><td><u>Excessive Hours</u>

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, UCAN failed to prove that. Accordingly, we have adjusted the entries below for a total reduction of 6.00 hours:

<table>
<tr><th>Date</th><th>Task</th><th>Hours</th></tr>
<tr><td>11/8/2021</td><td>Begin reviewing ALJ Ruling and Staff Proposal on Affordability Metrics Implementation</td><td>2.50</td></tr>
<tr><td>11/9/2021</td><td>Continue reading Staff Proposal on Affordability Metrics Implementation in preparation for workshop Nov. 15, 2021</td><td>2.00</td></tr>
<tr><td>11/11/2021</td><td>Continue reading Staff Proposal on Affordability Metrics Implementation in preparation for workshop Nov. 15, 2021</td><td>2.00</td></tr>
</table></td></tr>
</table>

<table>
<tr><th>Item</th><th>Reason</th></tr>
<tr><td></td><td>
<table>
<tr><td>11/12/2021</td><td>Begin writing comments on scoping memo and Staff Proposal</td><td>3.00</td></tr>
<tr><td>11/14/2021</td><td>Continue writing comments on scoping memo and Staff Proposal</td><td>2.00</td></tr>
<tr><td>12/15/2021</td><td>Continue writing comments on scoping memo and Staff Proposal with post workshop information</td><td>2.00</td></tr>
</table>
</td></tr>
<tr><td>[5]
Reduction of Hours for Jason Zeller in 2022</td><td>
<u>Excessive Hours</u>

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, UCAN failed to prove that. A large portion of the filing consists of responses to the Administrative Law Judge’s questions and policy recommendations rather than factual development or legal analysis. Given the nature of this filing and the level of contribution reflected in the comments, the full 6.00 hours claimed has been shown to be excessive. Accordingly, we have adjusted the entries below for a total reduction of 2.00 hours:

<table>
<tr><th>Date</th><th>Task</th><th>Hours</th></tr>
<tr><td>1/6/2022</td><td>Continue writing comments on scoping memo and Staff Proposal with post workshop information</td><td>2.00</td></tr>
<tr><td>1/10/2022</td><td>Finalize comments on scoping memo and Staff Proposal due today Jan. 10, 2022</td><td>4.00</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 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 reduce 1.50 hours for time associated with the following entries:

<table>
<tr><th>Date</th><th>Task</th><th>Hours</th></tr>
<tr><td>2/24/2022</td><td>Review Agenda and Participant Bios attached to email to service list for upcoming webinar; email invite to service list</td><td>1.50</td></tr>
</table>

The total number of hours reduction for Jason Zeller is 3.50 hours, leaving 37.50 hours approved for compensation in 2022.
</td></tr>
</table>

<table>
<tr><th>Item</th><th>Reason</th></tr>
<tr><td></td><td></td></tr>
<tr><td>[6]
Reduction of Hours for Jason Zeller in 2025</td><td><u>Excessive Hours</u>

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, UCAN failed to prove that. Accordingly, we reduce 3.00 hours from the following entry:

<table><tr><th>Date</th><th>Task</th><th>Hours</th></tr><tr><td>12/3/2025</td><td>Writing final sections of Opening Comments on Proposed Decision due today</td><td>7.00</td></tr></table></td></tr>
</table>

[7] Jane Krikorian 2021 Hourly Rate	D.21-12-050 approved the 2021 hourly rate of $350 for Jane Krikorian, we find the hourly rate reasonable and adopt it here.
[8] Reduction of Hours for Tyson Siegele in 2024	*Excessive Hours* . 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, UCAN failed to prove that. Accordingly, we have adjusted the entries below for a total reduction of 6.00 hours: **Date** / **Task** / **Hours** 1/12/24 / Data analysis Annual Affordability Report analysis to support comments on ruling / 3.10 1/13/24 / Data analysis Annual Affordability Report analysis to support comments on ruling / 2.90 1/14/24 / Data analysis Annual Affordability Report analysis to support comments on ruling / 3.30 1/15/24 / Data analysis Annual Affordability Report analysis to support comments on ruling / 6.20 1/16/24 / Data analysis Annual Affordability Report analysis to support comments on ruling / 3.90
[9] Tyson Siegele 2024-2026 Hourly Rate	UCAN has confirmed that Tyson Siegele 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.[14] 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)). UCAN has confirmed that per the terms of their contract, Tyson Siegele has been hired on a contingency rate basis, meaning that Tyson Siegele 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 Tyson Siegele's experience as an Expert – Not Otherwise Classified - V. Given that the 2024 rate range for Expert – Not Otherwise Classified - V is

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

	$253.40 to $490.78, we find a 2024 hourly rate of $345.00 to be reasonable and we adopt it here. Given that the 2025 rate range for Expert – Not Otherwise Classified - V is $264.22 to $401.60, we find a 2025 hourly rate of $355.00 to be reasonable and we adopt it here. Given that the 2026 rate range for Expert – Not Otherwise Classified - V is $275.06 to $412.44, we find a 2026 hourly rate of $365.00 to be reasonable and we adopt it here. We take ½ of Siegele's 2026 rate for an IComp preparation rate of $182.50. The award determined herein for Tyson Siegele's contribution in this proceeding shall be paid in full to Tyson Siegele, and no portion of this part of the award shall be kept by UCAN. 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.
[10] 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.
[11] Reduction of Hours for	*Excessive Hours* . Excessive is when the Commission determines that the time claimed is disproportionate to the reasonable amount of effort required for that

<table>
<tr><td>Tyson Siegele in 2025</td><td>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, UCAN failed to prove that. Accordingly, we have adjusted the entries below for a total reduction of 6.00 hours:

<table>
<tr><th>Date</th><th>Task</th><th>Hours</th></tr>
<tr><td>11/25/25</td><td>Research and analyze PD citations</td><td>5.70</td></tr>
<tr><td>11/26/25</td><td>Write sections of cmts on PD</td><td>6.00</td></tr>
<tr><td>11/29/25</td><td>Write sections of cmts on PD</td><td>2.30</td></tr>
<tr><td>12/01/25</td><td>Write sections of cmts on PD</td><td>7.50</td></tr>
</table></td></tr>
<tr><td>[12]
Reduction of Claim Preparation Hours</td><td>UCAN claimed 24.80 hours for preparation of the intervenor compensation request. While the claim was detailed, well-organized, and generally compliant with Commission requirements, we find the preparation hours excessive given the scope of issues and overall scale of the request.

UCAN has significant experience practicing before the Commission and preparing similar claims, and we would expect greater efficiency in compiling this request. Additionally, UCAN did not provide a rationale explaining why this particular claim—smaller in scale than some of their previous submissions—required this level of effort.

Accordingly, we reduce the claimed hours by 50%, awarding a total of 12.40 hours for claim preparation. Please see the table below for each claim preparer's deduction.
<table>
<tr><th>Staff</th><th>Requested IComp Prep Hours</th><th>Approved IComp Prep Hours</th></tr>
<tr><td>Tyson Siegele</td><td>12.30</td><td>6.15</td></tr>
<tr><td>Jason Zeller</td><td>4.00</td><td>2.00</td></tr>
<tr><td>Jane Krikorian</td><td>8.50</td><td>4.25</td></tr>
</table>
This adjustment better reflects the complexity and scale of the request.</td></tr>
<tr><td>[13]
Jason Zeller 2026 Hourly Rate</td><td>D.25-12-039 verified a 2025 hourly rate of $795.00 as a Legal – Attorney – V for Jason Zeller. Using our calculation methodology, based on the verified 2025 hourly rate of $795.00, 2026 escalation factor of 3.35%. 2026: $795.00 x 1.0335 = $821.63. After rounding to the nearest $5, Jason Zeller's 2026 hourly rate should be $820.00.

Given that the 2026 rate range for Legal – Attorney – V is $608.11 to $820.83, $820.00 does not exceed the hourly rate range for Mr. Zeller's rate category according to the Market Rate Study. As a result, we find it reasonable to adopt UCAN's requested rate for Mr. Zeller of $820.00 in 2026. We take ½ of Jason Zeller's 2026 rate for an IComp preparation rate of $410.00.</td></tr>
</table>

[14] Jane Krikorian 2026 Hourly Rate	UCAN requests a 2026 hourly rate for Jane Krikorian of $565.00 as Legal – Attorney - III. However, D.26-04-017 determined and verified a 2025 rate for Jane Krikorian of $520.00 as Legal - Legal Director – III. Using our calculation methodology, based on the verified 2025 hourly rate of $520.00, 2026 escalation factor of 3.35%. 2026: $520.00 x 1.0335 = $537.42. After rounding to the nearest $5, Jane Krikorian's 2026 hourly rate should be $535.00. We find the hourly rate of $535 reasonable and adopt it here. We take ½ of Jane Krikorian's 2026 rate for an IComp preparation rate of $267.50.
[15] Jason Zeller BAR Member Number	The record is corrected to reflect that UCAN inadvertently entered the Jason Zeller's State Bar member number as 139577; the correct member number should be 139477.

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. Utility Consumer's Action Network has made a substantial contribution to D.25-12-044 and D.22-08-023.

2. The requested hourly rates for Utility Consumer's Action Network'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 Utility Consumer's Action Network, 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 $93,027.26.

CONCLUSION OF LAW

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

ORDER

1. Utility Consumer's Action Network is awarded $93,027.26.

2. Within 30 days of the effective date of this decision, the California Public Utilities Commission shall pay Utility Consumer's Action Network the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning May 6, 2026, the 75th day after the filing of Utility Consumer's Action Network'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 from this agenda item and was not part of the quorum in its consideration.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D2608032	**Modifies Decision?**	No
Contribution Decision(s):	D2208023, 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
Utility Consumer's Action Network	2/20/2026	$110,532.50	$93,027.26	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
Jason	Zeller	Attorney	$410	2020	$410
Jason	Zeller	Attorney	$725	2022	$715
Jason	Zeller	Attorney	$770	2024	$770
Jason	Zeller	Attorney	$795	2025	$795
Jason	Zeller	Attorney	$820	2026	$820
Jane	Krikorian	Advocate	$350	2021	$350
Jane	Krikorian	Attorney	$565	2026	$535
Tyson	Siegele	Expert	$345	2024	$345
Tyson	Siegele	Expert	$360	2025	$355
Tyson	Siegele	Expert	$375	2026	$365

(END OF APPENDIX)