

Decision 26-09-023 September 3, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Green Power Institute for Award of
Intervenor Compensation for Substantial Contributions to
Resolution Numbers SPD-14, SPD-16, SPD-17, and
SPD-18.

Application 24-01-022
(Filed January 5, 2024)

**DECISION GRANTING COMPENSATION TO GREEN POWER INSTITUTE FOR
SUBSTANTIAL CONTRIBUTION TO
RESOLUTIONS SPD-14, SPD-16, SPD-17, AND SPD-18**

Intervenor: Green Power Institute	For contribution to Resolutions SPD-14, SPD-16, SPD-17, and SPD-18
Claimed: \$212,935	Awarded: \$105,599.80
Assigned Commissioner: Christine Harada ¹	Assigned ALJ: Carolyn Sisto

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	SPD-14, Ratifying Action of OEIS on the WMP Performance Metrics SPD-16, Ratifying Action of OEIS on SDG&E's 2023 WMP Update SPD-17, Ratifying Action of OEIS on SCE's 2023 WMP Update SPD-18, Ratifying Action of OEIS on BVES's 2023 WMP Update
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812²:

	Intervenor	CPUC Verification
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¹ Application 24-01-022 was reassigned from President John Reynolds to Commissioner Christine Harada on March 18, 2026.

² All statutory references are to California Public Utilities Code unless indicated otherwise.

Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	None	
2. Other specified date for NOI:	None	
3. Date NOI filed:	Concurrent with this Request for Compensation (see Attachment 16).	January 5, 2024. Since Resolutions (Res.) SPD-14, SPD-16, SPD-17, and SPD-18 are not “formal proceedings,” in which intervenor compensation claims can be filed (see Section 1801.3(a)), GPI, in accordance with our guidelines, ³ has initiated the subject application so that the claim pertaining to Res. SPD-14, SPD-16, SPD-17, and SPD-18 can be resolved.
4. Was the NOI timely filed?		Yes, the NOI was filed timely as an attachment to the application, consistent with our requirements.
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.22-10-010	Verified
6. Date of ALJ ruling:	May 15, 2023	Verified
7. Based on another CPUC determination (specify):	D.23-02-015	Not verified. D.23-02-015 referred to the earlier findings, pursuant to the rebuttable

³ See the Intervenor Compensation Program Guide at 27.

		presumption rule of §1804(b)(1) and did not make an independent finding on the customer status pursuant to §1802(b)(1)(C). Those findings have expired (see §1804(b)(1).
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.20-05-002	Not verified. The most recent finding of significant financial hardship was made in D.24-08-054, as adopted by the Commission in R.22-10-010.
10. Date of ALJ ruling:	November 20, 2020	Not verified. The most recent finding of significant financial hardship was made in D.24-08-054, as adopted by the Commission in R.22-10-010.
11. Based on another CPUC determination (specify):	D.23-02-015	D.23-02-015 did not make an independent finding on significant financial hardship pursuant to §1802(h). That decision relied on the earlier finding, pursuant to §1804(b)(1). That finding has expired. The applicable finding of significant financial hardship for the GPI was made in

		D.24-08-054 (R.22-10-010).
12. Has the Intervenor demonstrated significant financial hardship?		Yes, as described in the CPUC Verification sections above.
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	Resolution SPD-18	Verified. Also, Res. SPD-14, SPD-16, and SPD-17.
14. Date of issuance of Final Order or Decision:	December 15, 2023	Res. SPD-14 was issued on November 17, 2023. Res. SPD-16 and SPD-17 were issued on December 1, 2023. Res. SPD-18 was issued on December 15, 2023.
15. File date of compensation request:	January 5, 2024	Verified
16. Was the request for compensation timely?		Yes

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
	(Please note that Attachment 2 includes a list of issue areas and GPI Pleadings relevant to this Claim.)	Noted
1. 2023 WMP Performance Metrics The GPI made substantial contributions to Resolution SPD-14 and the OEIS <i>2023 Review of Performance Metrics for Electrical Corporations and Additional Requirements for Wildfire Mitigation Plans</i> document it	Resolution SPD-14 GPI supports the decision in Resolution SPD-14 to retain the WMP performance metrics, WMP requirements, and safety culture assessment process for the 2024 WMP annual filings, all of which reinforce the underlying Energy Safety documents (SPD-14, pg. 6). Pleadings	Verified, in part. GPI supported initial findings by OEIS and provided comments that led to changes in the items raised in item 2 and item 3.

approves by providing detailed analysis and commentary into the issues of what compulsory metrics and specifications should be required for the WMPs, how to streamline the presentations in the WMPs, and other proposals to make the review process for updates in later years of the cycle more efficient. OEIS adopted many of our suggestions, and in instances where our positions were not adopted, we made substantial contributions by enriching the record underlying the decisions.	GPI appreciates the efforts by OEIS to develop a WMP Update format that manages plan length and review time by focusing on material changes to wildfire mitigation approaches. We provide comments on the proposed WMP Update schedule, filing format, and definitions of reportable changes as well as content limits. [8/18/23 Comments, pg. 1.] We therefore suggest eliminating the Pre-submission completeness check and distilling the annual cycle into one comprehensive Draft WMP review that provides utilities with one opportunity to update their WMP prior to issuing an OEIS Decision (8/18/23 Comments, pg. 3). In these comments we propose various streamlines and other mechanisms to further tighten the guidelines and distinguish between the full WMPs, which are due on a three-year cycle, and the mid-period Updates (8/18/23 Comments, pgs. 9-10). GPI supports the decision in Draft Resolution SPD-14 to retain the WMP performance metrics, WMP Requirements, and safety culture assessment process for the 2024 WMP Annual Update filings, all of which reinforce the underlying OEIS document. GPI supports the use of the two-month lag time between the submission of the IOU WMPs and the SMJU WMPs, the requirement for limited redline versions of the 2023 WMPs, and we support the adjustments made in the OEIS document that are designed to expedite the annual WMP review process for intervenors. [11/2/23 Comments, pg. 1.]	
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2. Review of 2023-2025 SDG&E WMP. The GPI made substantial contributions to Resolution SPD-16 by performing a detailed analysis of SDG&E's 2023-2025 WMP, and providing OEIS and the Commission with the results of our analysis and our recommendations for fixing deficiencies in SDG&E's three-year plan, and in preparation for the coming three-year cycle. OEIS adopted many of our suggestions in responding to SDG&E, and in drafting their decision, which SPD-16 ratifies. In instances where our positions were not adopted, we made substantial contributions by enriching the record underlying the decision.	Resolution SPD-16 SPD-16, Appendix D. Stakeholder Comments on the 2023-2025 Wildfire Mitigation Plans, details contributions made by GPI in the areas of concurrences and introduction of new information. SPD-16, Appendix E. Stakeholder Comments on the Draft Decision, details multiple comments made by GPI resulting in changes made to the Decision. Pleadings The GPI performed a review of the IOUs' 2022 WMP Updates with a general focus on Risk Methodology and Assessment (WMP Section 6), Wildfire Mitigation Strategy Development (WMP Section 7), Wildfire Mitigation (WMP Section 8), and the intersection of these risk management elements, particularly with respect to the electrical distribution system (5/26/23 Comments, pg. 1). OEIS issued Draft Decisions on the 2023-2025 Base Wildfire Mitigation Plans for Southern California Edison (SCE) and San Diego Gas and Electric (SDG&E) on August 30, 2023. We submit comments for both Draft Decisions in the same filing in order to address parallel issues while also specifying recommendations for each electric utility. [9/19/23 Comments, pg. 1.]	Verified. Appendix A-22 of SPD-16 includes several references to edits GPI recommended to clarify the outcome of the Resolution.
3. Review of 2023-2025 SCE WMP. The GPI made substantial contributions to Resolution SPD-17 by performing a	Resolution SPD-17 SPD-17, Appendix D. Stakeholder Comments on the 2023-2025 Wildfire Mitigation Plans, details contributions made by GPI in the areas of	Verified. Appendix A-18 to A-20 of SPD-17 includes several references to edits GPI recommended to

detailed analysis of SCE's 2023-2025 WMP, and providing OEIS and the Commission with the results of our analysis and our recommendations for fixing deficiencies in the three-year plan, and in preparation for the coming three-year cycle. OEIS adopted many of our suggestions in responding to SCE, and in drafting their decision, which SPD-17 ratifies. In instances where our positions were not adopted, we made substantial contributions by enriching the record underlying the decision.	concurrences, and introduction of new information. SPD-17, Appendix E. Stakeholder Comments on the Draft Decision, details multiple comments made by GPI resulting in changes to the Decision. Pleadings The GPI performed a review of the IOUs' 2022 WMP Updates with a general focus on Risk Methodology and Assessment (WMP Section 6), Wildfire Mitigation Strategy Development (WMP Section 7), Wildfire Mitigation (WMP Section 8), and the intersection of these risk management elements, particularly with respect to the electrical distribution system (5/26/23 Comments, pg. 1). OEIS issued Draft Decisions on the 2023-2025 Base Wildfire Mitigation Plans for Southern California Edison (SCE) and San Diego Gas and Electric (SDG&E) on August 30, 2023. We submit comments for both Draft Decisions in the same filing in order to address parallel issues while also specifying recommendations for each electric utility. [9/19/23 Comments, pg. 1.]	clarify the outcome of the Resolution.
4. Review of 2023-2025 BVES WMP. The GPI made substantial contributions to Resolution SPD-18 by performing a detailed analysis of BVES's 2023-2025 WMP, and providing OEIS and the Commission with the results of our analysis and our recommendations for fixing deficiencies in the three-year plan, and in preparation for the coming three-year cycle. OEIS	Resolution SPD-18 SPD-18, Appendix E. Stakeholder Comments on the 2023-2025 Wildfire Mitigation Plans, details contributions made by GPI in the area of concurrences. SPD-18, Appendix G. Stakeholder Comments on the Draft Decision, details multiple comments made by GPI resulting in changes to the Decision. Pleadings	Verified. As noted by GPI, it contributed to the record considered for Resolution SPD-18.

adopted many of our suggestions in responding to BVES, and in drafting their decision, which SPD-18 ratifies. In instances where our positions were not adopted, we made substantial contributions by enriching the record underlying the decision. .	The GPI performed a review of the SMJUs' 2023-2025 WMPs with a general focus on Risk Methodology and Assessment; Grid Design, Operations, and Maintenance; and Vegetation Management; particularly with respect to how these issues affect the electrical distribution system (6/29/23 Comments, pg. 1). GPI generally supports the Areas for Continued Improvement (ACI) issued in the Draft Decision. However, as previously discussed in our comments on the Draft Decision on the 2023-2025 WMP of SCE and SDG&E, we advocate for additional detail in the Draft Decision given the 3-year implementation timeline, and we recommend strengthening the operationalization expectations for studies and collaborations. These comments largely mirror our comments on the OEIS Draft Decisions on SCE and SDG&Es 2023-2025 Base WMPs. [10/10/23 Comments, pg. 1.]	
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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, Mussey Grade, PAO		Verified. The Commission notes that it is interpreting PAO as referenced in A.24-01-022 to

	reference Cal Advocates and not the Commission's Public Advisor's Office.
d. Intervenor's claim of non-duplication: This proceeding covers a wide variety of topics related to the state's program for wildfire mitigation. The Green Power Institute has been an active participant in the Commission's RPS and LTPP/IRP proceedings, and a number of related proceedings, including the wildfire mitigation proceeding, R.18-10-007. The Green Power Institute coordinated its efforts in this proceeding with other parties in order to avoid duplication of effort, and added significantly to the outcome of the Commission's deliberations through our own unique perspective. Some amount of duplication has occurred in this proceeding on all sides of contentious issues, but Green Power avoided duplication to the extent possible, and tried to minimize it where it was unavoidable.	Noted

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: The GPI is providing, in Attachment 2, a listing of all of the pleadings we provided in this Proceeding in the Wildfire Safety Division that are relevant to matters covered by this Claim, and in Attachment 3, a detailed breakdown of GPI staff time spent for work performed that was directly related to our substantial contributions to Resolutions SPD-14, SPD-16, SPD-17, and SPD-18. The hours claimed herein in support of Resolutions SPD-14, SPD-16, SPD-17, and SPD-18 are reasonable given the scope of the Proceeding, and the strong participation by the GPI. GPI staff maintained detailed contemporaneous time records indicating the number of hours devoted to the matters settled by this Decision in this case. In preparing Attachment 3, Dr. Morris reviewed all of the recorded hours devoted to this proceeding, and included only those that were reasonable and contributory to the underlying tasks. As a result, the GPI submits that all of the hours included in the attachment are reasonable, and should be compensated in full. Dr. Morris is a renewable energy analyst and consultant with more than 40 years of diversified experience and accomplishments in the energy and environmental fields. He is a nationally recognized expert on biomass and renewable energy, climate change and greenhouse-gas emissions analysis, integrated resources planning, and analysis of the environmental impacts of electric power generation. Dr. Morris holds a BA in Natural Science from the University of Pennsylvania, an	After the adjustments made to this claim, the remainder of the claimed costs are reasonable. <i>See</i> Part III.D.

MSc in Biochemistry from the University of Toronto, and a PhD in Energy and Resources from the University of California, Berkeley. Dr. Morris has been actively involved in electric utility restructuring in California throughout the past three decades. He served as editor and facilitator for the Renewables Working Group to the California Public Utilities Commission in 1996 during the original restructuring effort, consultant to the CEC Renewables Program Committee, consultant to the Governor’s Office of Planning and Research on renewable energy policy during the energy crisis years, and has provided expert testimony in a variety of regulatory and legislative proceedings, as well as in civil litigation. Dr. Harrold has worked for the Green Power Institute (GPI) for a total of more than 10 years, as a Research Assistant from 2006 to 2008, and again as a Scientist from 2015 to present. Through her work with the GPI she has been engaged with the development of the Renewable Portfolio Standard program (RPS), the Integrated Resources Planning (IRP) proceeding, and the Wildfire Mitigation Plan (WMP) proceeding. Dr. Harrold earned a Ph.D. in geomicrobiology from the University of Washington, Department of Earth and Space Science in 2014. Decision D.98-04-059 states, on pgs. 33-34, “Participation must be productive in the sense that the costs of participation should bear a reasonable relationship to the benefits realized through such participation. ... At a minimum, when the benefits are intangible, the customer should present information sufficient to justify a Commission finding that the overall benefits of a customer’s participation will exceed a customer’s costs.” This proceeding is concerned with the development and approval of the wildfire mitigation plans of the wires utilities. The cost reductions and environmental benefits of the WMPs overwhelm the cost of our participation.	
b. Reasonableness of hours claimed: The GPI made Significant Contributions to Resolutions SPD-14, SPD-16, SPD-17, and SPD-18 by actively participating in workshops and working groups, and providing a series of Commission filings on the various topics that were under consideration in the Proceeding and are covered by this Claim. Attachment 3 provides a detailed breakdown of the hours that were expended in making our Contributions. The hourly rates and costs claimed are reasonable and consistent with awards to other intervenors with comparable experience and expertise. The Commission should grant the GPI’s claim in its entirety.	After the Commission’s review of the documents provided in this application, including the party’s response to the July 8, 2026, proposed decision we find the remainder of hours described in Part III.D [4,5] to provide reasonable compensation for GPI’s participation in the Commission’s resolution of Res.

	SPD-14, SPD-16, SPD-17, and SPD-18.
c. Allocation of hours by issue: 1. WMP Performance Metrics 10% 2. Review of 2023-2025 SDG&E WMP 30% 3. Review of 2023-2025 SCE WMP 40% 4. Review of 2023-2025 BVES WMP 20%	According to GPI's submitted timesheets, our calculations are as follows: 1. 4.27% 2. 28.98% 3. 38.16% 4. 28.58%

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
G. Morris	2023	138.00 ⁴	485	See comment 1	66,930	74.84 [4,5]	\$460.00 [1]	\$34,426.40
Z. Harrold	2023	473.75 ⁵	300	See comment 2	142,125	349.73 [4,5]	\$260.00 [2]	\$90,929.80
Subtotal: \$209,055						Subtotal 1: \$125,356.20		
						Adjustment [7]: -\$23,436.40		
						Subtotal 2: \$101,919.80		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
G. Morris	2023	16.00	242.5	½ 2023 rate	3,880	16.00 [1]	\$230.00	\$3,680.00
Subtotal: \$3,880						Subtotal 3: \$3,680.00		
TOTAL REQUEST: \$212,935						TOTAL AWARD: \$105,599.80		
*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								

⁴ Timesheets reflect total hours of 138.14 hours.⁵ Timesheets reflect total hours of 474.11 hours.

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**

C. Attachments Documenting Specific Claim and Comments on Part III⁶:

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Allocation of effort by issue, list of pleadings
Attachment 3	Breakdown of hourly efforts by issue category
Attachments 4-7	Res. SPD-14, Res. SPD-16, Res. SPD-17, and Res. SPD-18
Attachments 8-15	The eight pleadings listed in Attachment 2
Attachment 16	NOI
Comment 1	Dr. Morris's approved rate for 2022 is \$465/hr (D.23-11-036). The Commission has adopted a 4.46 percent escalation factor for converting 2022 to 2023 values. This value can be found on the Escalation tab of the Hourly Rate Chart spreadsheet on the Commission's web site. We apply the 4.46 percent escalator to the approved 2022 hourly rate for Dr. Morris, and round to the nearest 5 percent per established Commission practice, producing a rate request for 2023 of \$485/hr.
Comment 2	Dr. Harrold's currently approved rate for 2021 is based on the old (pre-2021 Market Rate Study) system. As of the date of this Application she does not yet have an approved rate for 2022 or 2023. GPI is requesting that for 2022 and following years Dr. Harrold's rate be converted to a Market Rate Study basis. For 2021, the basis year in the Hourly Rate Chart, Dr. Harrold is qualified as a Level IV Public Policy Analyst (8 years of practice before the Commission plus 4 years credit for a PhD degree), the range in the table is \$263.72-\$493.98. We are asking for a rate for Dr. Harrold that is based on the Hourly Rate Chart's basis year of 2021 of \$280/hr. Applying the 3.31 and 4.46 escalators and rounding to the nearest five produces a 2023 rate of \$300/hr. That is the rate that we are requesting in this Application.

D. CPUC Comments, Disallowances, and Adjustments

On September 16, 2025, a ruling was issued requesting GPI to submit additional information for various intervenor compensation (IComp) claims because the Commission had identified several issues within each separate claim, including: omission of requested information, unclear or

⁶ Attachments not included in the final Decision.

inconsistent details, invoices that did not align with submitted timesheets or hours claimed, invoices that included work unrelated to the claim at issue, making it difficult to determine which rates / hours apply to the specific claim, invoices billed to other entities that did not identify GPI or the consultant, and other inconsistencies that hindered the Commission's ability to evaluate and resolve the claims.

GPI was provided with an opportunity to submit supplemental information, including resumes for all individuals for whom compensation is sought, invoices reflecting the actual billed rates for each consultant that sought IComp in this proceeding. The Commission also sought more details regarding any consultant agreements for those representatives, where payment of consulting fees may be deferred and contingent upon the receipt of an IComp award.

GPI filed its response for supplement information for this proceeding on October 3, 2025. In its response, GPI confirmed the following:

1. GPI is a program of the Pacific Institute and is not a separate or independent entity and does not conduct business outside of or apart from the Pacific Institute.
2. GPI is a registered fictitious business name of the Pacific Institute and is the renewable energy program of the Pacific Institute.⁷ (However, the Commission notes that this fictitious business name expired in 2018).
3. Gregg Morris' agreement with the Pacific Institute is that when intervenor compensation payments are made to GPI, the Pacific Institute retains their overhead charge and pays the rest to Morris via Future Resources Associates, his dba company.
4. Through Future Resources Associates, Morris pays "practitioners" an initial upfront payment, followed by a second payment once the intervenor compensation award is issued. The specifics of these agreed upon rates and payment terms were filed under seal.
5. GPI states that the remaining award is used to pay the carrying costs of participation in Commission proceedings, the cost of the risk that not all hours in a given claim will be approved for payment, and the salary of Morris.
6. GPI states that Morris works entirely on a contingency basis and does not issue monthly invoices.

We make the following adjustments below based on the information at hand and a thorough assessment of GPI's contribution to the decision.

Item	Reason
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⁷ GPI states they are "a registered fictitious business name of the Pacific Institute." Public records found at Alameda County Clerk Recorder Office's (FBN) search (https://rechart1.acgov.org/BusinessLicense/SearchEntry.aspx?cabinet=LICENSES_FBN) reflect that fictitious business name Green Power Institute, was active from 6/11/2013 to 6/11/2018 and is currently expired.

[1] Gregg Morris' (Morris) 2023 Hourly Rate	GPI identifies Morris as the director of GPI and confirms that he is not an employee of GPI.⁸ Supplemental information confirms that Morris is dba Future Resources Associates, working on a contingency basis for the Pacific Institute, meaning that Morris has agreed to defer his 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 Morris' experience as an Advocate - Executive Director - Level V. The rate range for an Advocate - Executive Director - Level V for 2023 is \$191.49 - \$464.81. Given Morris' experience, we approve an hourly rate of \$460 for 2023. We apply one-half of Morris' approved 2023 rate of \$460.00 for an Intervenor Compensation Claim Preparation rate of \$230.00.
[2] Zoë Harrold's (Harrold) 2023 Hourly Rate	Although GPI continues to identify Harrold as a staff associate of GPI, or a "contract employee,"⁹ supplemental information provided confirms that Harrold works as a consultant, who in turn bills Future Resources Associates, (not GPI or the Pacific Institute), for work in this proceeding. The Commission requested supplemental documentation be submitted by GPI to confirm the rates charged by Harrold. GPI filed the "Associate Service Agreement Addendum"¹⁰ between Future Resources Associates (Morris) and Harrold under seal, but states that per the terms of the contract, Harrold has been hired on a contingency basis, where Harrold receives an initial payment upon invoicing, followed by a second payment contingent upon receipt of this intervenor compensation award. Based on these terms, we approve an hourly rate of \$260 for 2023. 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 full 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

⁸ GPI Comments on the July 8, 2026, proposed decision at 3.

⁹ *Id.* at 4.

¹⁰ GPI did not provide the existing Associate Services Agreement it references from October 2010 as part of its supplemental documentation. While the Commission will accept the Addendum as a contractual agreement between Future Resources Associates (Morris) and Harrold, for purposes of this proceeding, GPI is reminded that the Commission strictly requires full and accurate disclosure of all information material to request for intervenor compensation.

	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, GPI did not provide all the documentation pertaining to the contract terms between GPI and Harrold in the initial claim and waited until the Commission requested supplemental documentation, which significantly delayed the processing of this claim.
[3] Correction to Total Hours Awarded	GPI claims a total of 627.75 hours, including Intervenor Compensation Claim Preparation time. However, timesheets provided by GPI indicate a total of 628.25 hours, including preparatory hours. We adjust the hours accordingly. However, we remind GPI to properly substantiate billing to avoid the Commission's future reduction of hours.
[4] Lack of Substantial Contribution – Item 1	As discussed above, GPI supported initial findings by OEIS and provided comments that led to changes in the items raised in item 2 and item 3; however, in SPD-14 (item 1), GPI only supports the decision to retain the WMP performance metrics, WMP requirements, and safety culture assessment process for the 2024 WMP annual filings. We acknowledge that GPI did file comments in support of SPD-14 (item 1) but did not provide any unique perspectives or analysis that led to a contribution related to Issue 1. GPI requested over \$10,000 in compensation (\$5,941.25 for Morris and \$4,173 for Harrold) for this effort, which is excessive for the limited effort involved and the limited contribution made. Therefore, these hours are reduced accordingly. • Gregg Morris 2023 hours: 9 hours disallowed • Zoë Harrold 2023 hours: 10 hours disallowed We remind GPI, per the Intervenor Compensation Program Guide Part III(B)(3)(a)(i) at 21, that an intervenor’s claim of cost reasonableness “must demonstrate that your participation was necessary, productive, effective and efficient.” Additionally, as stated in Part III(B)(2)(a)(ii) at 20, an Intervenor’s claim must reference the “specific portion of the order or decision that indicates the CPUC has adopted in whole or in part your contentions or recommendations.” A mere reference to or summary of your own comments does not establish that those comments were considered, adopted, or relied upon by the Commission, either in whole or in part.

[5] Reduction of Hours – Internal Duplication	The Commission compensates intervenors for reasonable and efficient participation that contributes to the development of the record and aids in decision-making. A review of GPI’s timesheets shows significant overlap and internal duplication in Gregg Morris’ and Zoe Harrold’s time records. Specifically, both representatives dedicated over 330 hours¹¹ to working on the same issues, attending the same meetings and reviewing or revising the same drafts where only one representative would have been sufficient, given the limited scope of the issues involved. The records indicate that similar tasks were billed by both participants without clear delineation of individual responsibility or added substantive value. Such repeated internal review and joint editing is not reasonable, efficient, productive or always necessary. GPI failed to demonstrate why having multiple representatives doing this work provided significant additional value in assisting the Commission. GPI is reminded that the Commission awards compensation for efficient efforts that contribute to proceeding outcomes, and that GPI’s work should be sufficiently streamlined to prevent unproductive hours claimed. In the past, the Commission has disallowed inefficient activities and applied reductions to intervenor hours that reflect excessive internal duplicative efforts, such as “numerous internal communications, review of each other’s documents, working on the same materials, engaging in the same tasks and participating in the same events.” <i>See</i> D.12-03-024 at 24-25. For the internal duplication, excessive and unproductive hours claimed, and various tasks in timesheets that were deemed to have not significantly contributed to the decision-making process, we reduce 50% of the duplicative hours spent performing the same tasks, not previously reduced (Item 1), for Morris and Harrold in 2023. This reduction (54.30 hours for Morris and 114.38¹² hours for Harrold) is commensurate with the contribution made in these areas.
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¹¹ The exact total duplicative hours for similar tasks claimed by Morris and Harrold is 337.55.

¹² Rounded to the nearest hundredth.

[6] Intervenor Responsibility for Transparency and Accuracy in Compensation Requests	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. 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. Intervenor 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.
[7] Other Comments	Upon closer review of the Associate Service Agreement Addendum, we find that the compensation GPI is requesting for the consultant's time significantly exceeds the actual rate and compensation the consultant would receive under the contract terms. The Intervenor Compensation Program is funded by ratepayers and is intended to reimburse reasonable costs of participation. As established in D.07-01-009, D.08-04-010, and Resolution ALJ-235, the rate requested by an intervenor must not exceed the actual rate billed by the consultant.¹³ Because the consultant has agreed to be paid a percentage of the Commission approved rate and hours, the requested compensation in this claim does not accurately reflect the actual cost of the consultants' services. Compensating GPI the full request would result in an overpayment of the consultant's actual fees. GPI also admits that it pays its consultants only a set percentage of the amount it requests from the Commission, and that the remaining portion is used to cover carrying costs, the risk that not all claimed hours will be approved, and Morris' salary. Therefore, in instances where compensation to the intervenor for the consultant's time exceeds the amount the intervenor will actually pay the consultants under their contract terms, the Commission will reduce the award to match the actual cost incurred. Here, we reduce the award by \$23,436.40 to ensure that the amount awarded in this claim for the consultant's services aligns with the actual compensation

¹³ D.07-01-009 at 5, D.08-04-010 at 5, and Resolution ALJ-235 at 4.

	terms established in the Associate Service Agreement Addendums. Because the Associate Service Agreement Addendums between Future Resources Associates and the consultants were filed under seal, we do not disclose here how the reductions are specifically calculated.
Other Comments	The Commission finds the deficiencies in this filing to be concerning and expects a higher standard of transparency and diligence moving forward. The submission was not only missing essential documentation but also contained unclear information regarding consultant terms, missing invoices or errors throughout. This resulted in inefficient use of the intervenor's own time and an undue burden on Commission staff resources to reconcile these omissions. Please be advised that future claims lacking necessary supporting evidence will be assessed solely on the information provided; if the Commission cannot verify portions of the claim, those portions may be denied ensuring the program operates efficiently for all participants.

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 (<i>see</i> Rule 14.6(c)(6))?	No

GPI filed comments on this proposed decision on August 12, 2026. Some of these comments were broad, general, and addressed twelve other proposed decisions, some of which are not relevant to this proceeding. Under Rule 14.3(c), comments must focus on factual, legal, or technical errors. Accordingly, we address only those portions of GPI's comments that identify claimed errors pertaining to this proceeding.

1. The Governing Legal Standard

GPI comments that it is "Commission practice to give credit to a substantial contribution that enriches the record upon which a Decision was made, regardless of whether it was adopted by the Commission. An argument that effectively makes the case for a position that the Commission ultimately decides against, thus ensuring that all sides have been fully considered, is absolutely qualified as a substantial contribution. In addition, while the statutes require that an intervenor make a substantial contribution to a Decision, they do not limit compensation to only the hours that linearly led to the substantial contribution."¹⁴ GPI goes on to state that "there has been no announcement from the IComp program that its standards for evaluating IComp claims have changed, or that rules are now being interpreted differently than what was done in the past.

¹⁴ Comments of the Green Power Institute on the Proposed Decision at 2.

Therefore, the well-established standards for evaluating IComp claims should be applied to this claim, and most or all of the deductions in hours should be rescinded.”¹⁵

The Commission confirms that the process for evaluating IComp claims has not changed, nor have the rules governing the IComp program. We reiterate that Pub. Util. Code §1802(j) confirms that a substantial contribution means that the intervenor “has substantially assisted the commission in the making of its order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer.” The courts have addressed the requirement of substantial contribution in, for example, *TURN v. CPUC* 166 Cal.App. 4th 522 (2008), stating at 11: “[T]o be eligible for compensation, the statute requires that the customer have made a ‘substantial contribution’ to the PUC’s proceedings, as the PUC determines. “‘Substantial contribution’ means that, in the judgment of the commission, the customer’s presentation has substantially assisted the commission in the making of its order or decision....”

In this decision, the Commission assessed whether GPI’s claimed hours reasonably aligned with the contributions it asserted and made adjustments as appropriate based on its judgment. Pub. Util. Code §1803 states that the “The commission shall award *reasonable* advocate’s fees, *reasonable* expert witness fees, and other *reasonable* costs of preparation for and participation in a hearing or proceeding” to intervenors who have made a substantial contribution. We remind GPI that providing a substantial contribution does not, by itself, guarantee *full* reimbursement of *all* claimed fees and costs. Lastly, we confirm that compensation is awarded for contributions that are efficient and meaningfully advance the Commission’s work, even when the intervenor’s positions are not adopted. As GPI itself notes, a “finding of substantial contribution does not entitle a customer to every claimed hour, and the Commission may reduce hours that are genuinely excessive or unreasonable.”¹⁶ The Commission has explained that some of the hours requested by GPI were duplicative and/or did not meaningfully contribute to the outcome of the resolutions. Therefore, we make no changes to the decision.

GPI comments that TURN and the Center for Accessible Technology filed comments on July 28 in support of their claim in Rulemaking (R.) 19-09-009 “complaining that improper standards were being imposed.” GPI claims that their comments pertain to this decision as well.¹⁷

The Commission confirms that TURN and the Center for Accessible Technology did not file comments on the proposed decision in this proceeding, but they did file comments in a different proceeding (R.19-09-009). We do not address TURN and the Center for Accessible Technology’s comment here as they do not pertain to this proceeding, but we must correct GPI’s mischaracterization of them. TURN and the Center for Accessible Technology did not indicate that their comments in R.19-09-009 were intended to apply to other proposed decisions in other

¹⁵ *Ibid.*

¹⁶ *Id.* at 9.

¹⁷ *Ibid.*

proceedings, including this one as GPI claims. Their comments were specific to R.19-09-009; had they intended those comments to apply here, they would have filed comments in this proceeding as well. Additionally, their comments did not state support for GPI's claim. Instead, they requested clarification from the Commission that an intervenor may establish substantial contribution when it materially supplements or complements another intervenor's showing on the same issue, and that an intervenor may receive compensation even if its positions are not adopted, provided the Commission determines that the intervenor made a substantial contribution.¹⁸

2. Commission Policy on Consultant Compensation

In its comments, GPI asserts that the standard established in D.07-01-009 does not apply in this instance, where we state that "in no event should the rate requested by an intervenor exceed the rate billed to that intervenor by any outside consultant it hires." GPI claims that Harrold, who performs nearly all of her work for GPI, is not an outside consultant but functions more like a contract employee. According to GPI, classifying her as an outside consultant is incorrect and leads to inaccurate conclusions in the proposed decision.¹⁹

The Commission is not convinced by GPI's argument that Harrold is not a consultant, but a contract employee of GPI. Harrold was retained to provide services for GPI/Future Resources Associates and has a formal service agreement with GPI/Future Resources Associates outlining the terms and payment arrangements, all of which are consistent with a consultant relationship, regardless of the terminology GPI prefers. Harrold bills Future Resources Associates directly for her work in this proceeding, and although GPI chooses not to label her as a consultant, the Commission still applies the standard that intervenors may not request rates higher than those billed by their consultants. Therefore, we make no changes to the decision.

3. Hourly Rates for Morris

GPI objects to Morris' 2023 hourly rate of \$460 and argues that it should be increased to the requested rate of \$485.

As stated above, Morris is dba Future Resources Associates, working on a contingency basis for the Pacific Institute, where he has agreed to defer his consulting fee contingent upon receipt of this intervenor compensation award. Given that arrangement, we utilized the reasonable rates established by Resolution ALJ-393 based on Morris' experience as an Advocate - Executive Director - Level V. The rate range for an Advocate - Executive Director - Level V for 2023 is \$191.49 - \$464.81. We maintain Morris 2023 hourly rate of \$460 as it already reflects the upper limit for this level. We note that the previously approved rates that GPI references to

¹⁸ Comments of The Utility Reform Network and Center for Accessible Technology on the Proposed Decision Denying Compensation to Green Power Institute for Lack of Substantial Contribution to Decision 24-11-004 at 2-4.

¹⁹ Comments of the Green Power Institute on the Proposed Decision at 4.

were approved for a different role. Given Morris' clarification that he serves in the role of a director, this is the correct role to be used to establish his rates. Therefore, we make no changes to the decision.

4. Hourly Rates for Harrold

GPI objects to Harrold's awarded 2023 hourly rate of \$260 and argues that it should be increased to the requested rate of \$325.

We uphold the awarded 2023 hourly rate of \$260 based on the terms outlined in the service agreement and filed under seal (Attachment C, 2023 invoices from Zoe Harrold to the Green Power Institute for work on A.24-01-022 related to GPI's January 5, 2024 intervenor compensation claim). This rate is consistent with the Commission's policy on consultant compensation. Therefore, we make no changes to the decision.

5. Reduction in Hours

GPI objects to the reduction in hours, stating that the Commission cannot reduce an award because a customer's contribution overlapped that of others and that the intervenor compensation statute does not permit reductions to intervenor compensation awards on account of duplication once the Commission has determined that the participant made a substantial contribution.²⁰ GPI suggests that Decision 03-03-031 partially overruled D.98-04-059 with a finding that "the intervenor compensation statute does not permit a duplication discount based on Public Utilities Code §1801.3(f), once a substantial contribution has been made."²¹ GPI states that "a partial verification is sufficient to qualify for a substantial contribution, and should not engender a percentage reduction in hours."²² Specifically, GPI points out that even if the degree of "internal duplication" described in the proposed decision was legitimate, the proposed decision only identified 320 hours of duplicative effort, which would imply that no more than 160 hours might be reduced. The proposed decision reduced more than 290 hours, which is arbitrary and unjustified. GPI believes that there should be no reduction in hours for "internal duplication," because in fact there was no internal duplication, but if there is a reduction it should in any case not exceed 160 hours at the worst.

The Commission evaluated GPI's substantial contribution by determining whether the hours claimed were proportional to the value of the contributions provided. Under Pub. Util. Code §1803, the Commission awards reasonable fees and costs to intervenors who make a substantial contribution, but we remind GPI that such a contribution does not automatically guarantee full reimbursement of all claimed hours or expenses. Further, Pub. Util. Code §1801.3(f) requires the program to be administered in a manner that avoids unnecessary or

²⁰ *Id.* at 9.

²¹ *Id.* at 9.

²² *Id.* at 10.

duplicative participation, particularly where similar interests are already represented or additional participation is not needed for a fair outcome. GPI did not sufficiently justify why the additional participation of two representatives was productive or needed to perform the same tasks in support of the resolutions, or how it added significant value in assisting the Commission. Accordingly, we uphold the reduction percentages but correct the number of hours to which those reductions were applied. We also adjust GPI's hours for its limited contribution on Item 1. These changes result in additional hours being awarded to GPI. We also note that this increase in hours awarded results in an overpayment to the consultant, which is adjusted as described in Part III.D, Disallowance [7].

FINDINGS OF FACT

1. Green Power Institute has made a substantial contribution in some aspects related to the Commission's findings in Resolutions SPD-14, SPD-16, SPD-17, and SPD-18.
2. The requested hourly rates for Green Power Institute's representatives as adjusted herein, 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 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 reasonable compensation is \$105,599.80.

CONCLUSION OF LAW

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

ORDER

1. Green Power Institute is awarded \$105,599.80, to be paid by Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Liberty Utilities, Bear Valley Electric Service, and PacifiCorp.

2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Liberty Utilities, Bear Valley Electric Service, and PacifiCorp shall pay Green Power Institute \$2,430.87, their respective share of the 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 March 20, 2024, the 75th day after the filing of Green Power Institute's request, and continuing until full payment is made.
3. Within 30 days of the effective date of this decision, San Diego Gas & Electric Company shall pay Green Power Institute \$33,120.39, their respective share of the 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 March 20, 2024, the 75th day after the filing of Green Power Institute's request, and continuing until full payment is made.
4. Within 30 days of the effective date of this decision, Southern California Edison Company shall pay Green Power Institute \$40,692.07, their respective shares of the 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 March 20, 2024, the 75th day after the filing of Green Power Institute's request, and continuing until full payment is made.
5. Within 30 days of the effective date of this decision, Bear Valley Electric Service Company shall pay Green Power Institute \$29,356.48, their respective share of the 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 March 20, 2024, the 75th day after the filing of Green Power Institute's request, and continuing until full payment is made.
6. Application 24-01-022 is closed.

This decision is effective today.

Dated September 3, 2026, at Sacramento, California.

JOHN REYNOLDS
President
DARCIE L. HOUCK
KAREN DOUGLAS
MATTHEW BAKER
CHRISTINE HARADA
Commissioner

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:	D2609023	Modifies Decision?	No
Contribution Decision(s):	Resolutions SPD-14, SPD-16, SPD-17, and SPD-18		
Proceeding(s):	A2401022		
Author:	ALJ Carolyn Sisto		
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Bear Valley Electric Service Company, Liberty Utilities, and PacifiCorp		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Green Power Institute	Jan. 5, 2024	\$212,935	\$105,599.80	N/A	See Part III.D CPUC Comments, Disallowances, and Adjustments section above.

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Gregg	Morris	Expert ²³	\$485	2023	\$460.00
Zoë	Harrold	Scientist ²⁴	\$300	2023	\$260.00

(END OF APPENDIX)

²³ Morris is classified as a consultant to GPI.

²⁴ Harrold is classified as a consultant to GPI.