

Decision 26-09-018 September 3, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Modernize
the Electric Grid for a High Distributed
Energy Resources Future.

Rulemaking 21-06-017

**DECISION GRANTING COMPENSATION TO
GREEN POWER INSTITUTE
FOR CONTRIBUTION TO DECISION 24-10-030**

Intervenor: Green Power Institute	For contribution to Decision (D.) 24-10-030
Claimed: \$403,164 ⁵	Awarded: \$121,478.90
Assigned Commissioner: Darcie L. Houck	Assigned ALJs: Justin Regnier and Jack Chang ¹

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.24-10-030 Adopts improvements to distribution planning and project execution process, data portals, and ICA maps.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812²:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	August 17, 2021	Verified
2. Other specified date for NOI:	None	
3. Date NOI filed:	September 10, 2021	Verified

¹ This proceeding was reassigned from ALJ Manisha Lakhanpal to ALJ Jack Chang on July 24, 2025.

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

	Intervenor	CPUC Verification
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.22-10-010	R.20-05-002
6. Date of ALJ ruling:	May 15, 2023	November 20, 2020
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
Showing of “significant financial hardship” (§ 1802(h) or § 1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	R.22-10-010 (see note below)	R.20-05-002
10. Date of ALJ ruling:	May 15, 2023	November 20, 2020
11. Based on another CPUC determination (specify):	D.24-08-054	R.20-05-002; November 20, 2020
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.24-10-030	Verified
14. Date of issuance of Final Order or Decision:	October 23, 2024	Verified
15. File date of compensation request:	December 20, 2024	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Intervenor’s Comment(s)	CPUC Discussion
Line 9	The May 15, 2023, ALJ Ruling on GPI’s NOI in R.22-10-010 requested additional financial information before making a finding of “significant financial hardship.” On June 22, 2023, GPI submitted the requested additional information in our filed Supplement to the NOI. Decision D.24-08-054 made the final determination, finding that GPI had demonstrated significant financial hardship and was eligible to receive intervenor compensation.	Verified

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

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
GPI made substantial contributions to D.24-10-030 with constructive proposals, by critiquing IOU DPEP and DIDF methods, consultant analyses and white papers, and staff proposals; by active participation in DIDF DPAG meetings and HDER workshops; and by providing informal comments as well as formal (filed) comments to Ruling questions and the Proposed Decision regarding DPEP and DIDF reform, since the current proceeding was initiated in 2021 (R.21-06-017). Since the original distributed resources OIR was issued in 2014 (R.14-08-013), GPI has also been an active participant in the Commission's deliberations regarding distributed energy resources (DERs).	(Please note that Attachment 2 includes a list of issue areas and GPI Pleadings relevant to this Claim.)	Noted, however we note that GPI simply provides a list of issues it commented on rather than citing where in the decision the Commission relied on its comments to make any final determinations. A reference to or summary of your own comments within a decision does not establish that those comments were considered, adopted, or relied upon by the Commission, either in whole or in part.
1. Improved Demand and Load Growth Forecasting The GPI made substantial contributions to Decision D.24-10-030 by advocating for improved demand forecasting methods and enhanced load growth estimations, essential to	Decision D.24-10-030 Extend the distribution planning forecast horizon to a minimum of 13 years and Utilities' planning horizons to 10 years but maintain the three-year minimum horizon for line section analysis (D.24-10-030, pg. 2).	Not Verified; The Commission's determinations in D.24-10-030 did not rely upon or reflect analysis or proposals from GPI on this issue, and GPI's submissions did not

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maintaining grid reliability amid rising DER adoption. Through detailed comments and recommendations, GPI supported the integration of bottom-up data approaches, scenario planning, and flexible forecasting horizons, including requiring utilities to expand the DPP forecast horizon to ten years to align with IEPR. GPI has strongly advocated for a decentralized and democratized energy system, the use of bottom-up, known load data as a tool for capturing more accurate and up-to-date, customer/market-driven granular transportation electrification and other electrification-adoption trends. These contributions align with the Commission's decision to require utilities to adopt reliable, data-driven load projections, as outlined in Decision D.24-10-030, which now mandates utilities use scenario-based forecasting to refine distribution planning. GPI's insights helped ensure that load forecasting better accommodates local, policy-driven electrification goals, as recognized in the decision's framework. GPI recommendations and queries regarding known load data applications capable of improving the DIDF and	Use reliable bottom-up data to estimate load growth in a given year, defining reliable bottom-up data as customer energization requests and potentially certain types of pending loads, and allowing the estimate to exceed the forecasted load growth that is based on the Integrated Energy Policy Report (IEPR) data, with guardrails. The decision allows Utilities to select a newer IEPR vintage to use in distribution planning. [D.24-10-030, pg. 3.] The Staff Proposal references previous comments from SCE that recommend a prior practice of reducing focus on disaggregation of a system level forecast and increasing focus on bottom-up forecasting methodologies. ... Other parties recommending the use of bottom-up forecasting include Clean Coalition, Green Power Institute, and Joint CCAs. The Staff Proposal asserts that the use of bottom-up known load that exceed the annual IEPR load growth meets requirement five of Pub. Util. Code § 936(a)(1), which directs Utilities to consider projections of load that exceed the IEPR forecast. [D.24-10-030, pgs. 39-40.] ... this decision adopts the requirement for Utilities to improve the method for setting caps on load growth from the IEPR data but specifies that Utilities should work with the CEC and Commission staff in developing proposals for the method and accounting for discrepancies between the system and circuit level. [D.24-10-030, pgs. 43-44.]	substantially contribute or materially enrich the record. GPI also points back to its own comments rather than citing to where in the decision the Commission relied on its comments to make any final determinations. <i>See</i> Part III.D CPUC Comments, Disallowances and Adjustments [6, 7].

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DPEP were included in the development of the Kevala+ Distribution Investment Deferral Framework: Evaluation and Recommendations Report (11/14/2022). GPI recommendations regarding the use of known-loads to both inform the IEPR and modify top-down IEPR-based distribution planning also informed the Kevala Report, which references GPI liberally. GPI's advocacy substantially contributed to the Decision, which orders Utilities to improve their load growth and DER disaggregation methods but declines to order a specific method. The Decision also creates transparency and oversight mechanisms via mandatory GNA and DFWG reporting. While not specifically managed via the DPAG, the required reporting and oversight via the DFWG provides equivalent oversight measures as those recommended by GPI. GPI has consistently advocated for improved data sharing between the DPP and other external load forecasting initiatives in support of preparing the distribution grid for current and future transportation and building electrification	To track progress toward improved disaggregation in the interim, Utilities shall report annually in the GNA on the development of advanced disaggregation methodologies and present these at the annual Distribution Forecast Working Group workshops or successor workshops. ... this serves as a singular directive for Utilities to improve disaggregation for load growth and distributed energy resources without the requirement for any specific disaggregation methodology. [D.24-10-030, pg. 65.] This decision adopts the proposal to require Utilities to track and report known load projects to the CEC. As discussed below, a prior ruling directed Utilities to coordinate with the CEC regarding all large known load projects. Hence, this decision modifies the proposal to omit the creation of a database and directs Utilities to supplement currently provided data to include all known load. Further, the record shows that this data is and should remain confidential. [D.24-10-030, pg. 130.] Pleadings In addition to the IEPR demand scenarios, each utility should continue to utilize methods to disaggregate total demand to reflect localized variations, from a "bottom up" perspective, to refine distribution investment planning. This will include full consideration of regional and local demand, by definition. Each utility may exercise its own discretion in this process as long as it conforms to Commission guidance and remains	

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adoption. This includes GPI comments recommending the use of known-load data, time-of-use information, and ultimately the in-progress FIP, now termed the TE Proactive Planning (TEPP) Framework, to inform distribution grid use and expansion capable of timely serving transportation electrification demand while balancing ratepayer cost.	subject to and responsive to independent review through the Distribution Planning Advisory Group (DPAG), and also by an Independent Evaluator (IE). [Comments, 5/22/2023, pgs. 4-5.] A five-year planning horizon is not sufficient for distribution grid planning. Distribution loads are anticipated to grow substantially across all areas as California vigorously pursues both building and transportation electrification over the next two or more decades, on its way to a 100% renewable electricity future by 2045 (or sooner) ... Yes, given the above considerations, it would be generally appropriate to utilize the IEPR 15-year demand forecasts consistently in the DPP and for coordination of all distribution planning activities, but subject to disaggregation and refinement within each local distribution planning area. To the extent that well-founded forecasts are available with information that would influence prudent upgrade investment plans and decisions, forecast data beyond five years should not be ignored. It may also make sense to include two different planning horizons, with different degrees of certainty, such as, for example: 1) the five-year horizon with a relatively high level of certainty; 2) the 15-year horizon with a relatively lower level of certainty. Any infrastructure investment decisions would then consider both time horizons before expenditures are made. [Comments, 5/22/2023, pg. 6-8.]	

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	GPI supports requiring that the IOUs provide a comparison on their known loads to the IEPR demand forecast...GPI recommends requiring that all IOUs provide known and economic load growth figures with comparisons to IEPR low-, mid-, and high annual and cumulative load growth.... Graphical data will inform the review of DIDF known load allocation methods, load forecast certainty, and will also increase transparency by displaying both bottom-up and top-down load forecast elements. These data will also facilitate the alignment of IEPR forecast selection and scenario modeling for DPP, Integrated Resources Planning (IRP), and Resource Adequacy (RA) purposes. [Comments 5/22/2023, pg. 26.] These data will inform bottom-up known load forecast certainty assessments as well as alignment with IEPR forecasts (energy forecasts) for the purpose of both DPP (including DIDF) and IRP planning (capacity planning). If any of these data are not currently tracked, GPI recommends requiring IOUs to begin to track these metrics given the necessity of efficient load interconnection and grid preparation to support the anticipated increased reliance on the electric system required to achieve statewide greenhouse gas reduction goals. [Comments 5/22/2023, pg. 29.] Towards risk hedging, a more unified bottom-up (known load data) and top-down (IEPR forecasting) forecast could reduce distribution development	

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	risk, however, care must be taken to simultaneously adjust both forecasting approaches in order to prevent double counting of load. [Comments 5/22/2023, pg. 32, cited in Staff Proposal for the High DER proceeding, 3/13/24, pg. 94.] GPI supports these additional recommendations and agree that adding a robust and data-based “pending loads” category to DPP could be an important way to accelerate proactive energization efforts for charging and similar loads. [Comments, 6/18/2024, pg. 4.] GPI supports this proposal. Increasing information exchange of IOU known load tracking with the CEC can support more robust and perhaps higher certainty load forecasting, which is critical to many CPUC proceedings, including but not limited to the Renewable Performance Standard and Integrated Resources Planning proceedings. This will also better connect bottom-up distribution planning processes with top-down system planning processes (e.g. the IRP and TPP) via the IEPR forecast. [Comments, 06/24/2024, pg. 20.]	
2. Integration Capacity Analysis (ICA) and Hosting Capacity Improvements. GPI played a pivotal role in advocating for updates and greater transparency in the ICA framework, going back to the beginning of the predecessor DRP proceeding,	Decision D.24-10-030 This decision adopts the proposal to incorporate more detail of limiting criteria into ICA results in the data portals. However, as explained below, the Commission finds that describing how an upgrade would affect a timeline is complex. Accordingly, the proposal is modified to omit the	Verified

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better aligning the ICA with current interconnection demands and DER growth. GPI's detailed proposals contributed to CPUC's adoption of requirements for ICA automation, regular updates, more accurate results, and inclusion of limiting criteria into ICA results. This work streamlines interconnection processes and site scoping by providing accessible, accurate hosting capacity data, thus allowing DER developers to bypass some redundant screening steps, and obtain quickly accurate and actionable interconnection and energization data. GPI's efforts also highlighted the need for ICA data integration within utility business processes, a recommendation adopted specifically for PG&E in the Decision. GPI has provided extensive comments on ongoing issues re ICA accuracy, inclusive of the pitfalls of ICA zero data. GPI provided comments on the criticality of ICA transparency and accuracy for ensuring its usefulness/actionability and application by third parties and utilities. These substantial contributions were cited in D.24-10-030 as contributing to the background and rationale for	requirement to provide typical timelines. [D.24-10-030, pg. 138.] In comments to the April 6 Ruling, Clean Coalition and GPI highlighted accuracy and transparency of ICA data as leading to overall improvement. ... GPI maintains accuracy is the number one critical improvement needed to the ICA. Pg. 141. ... The Commission agrees with parties that the adoption of this Staff Proposal recommendation will improve the accuracy of ICA results (D.24-10-030, pg. 143). GPI, EDF/NRDC, and IREC also support this proposal. ... It is the intention of the Commission to limit barriers to access to the data portals. Accordingly, the Commission finds that the elimination of registration requirements will eliminate another potential barrier. Accordingly, no later than 90 days after the issuance of this decision, PG&E and SDG&E shall complete removal of all registration requirements for data portal access. [D.24-10-030, pgs. 145-6.] Clean Coalition supports adoption of this proposal. Cal Advocates supports this recommendation, stating that the required use of the 15/15 Rule will provide stakeholders with access to a larger amount of valuable data. GPI and IREC also support this proposal. Pgs. 148-149. Accordingly, this decision adopts the 15/15 Rule for the ICA and, relatedly, the GNA and DDOR (or successor report). This decision also specifies that for purposes of the ICA, the GNA and DDOR (or successor report), the 15/15 Rule is defined as a data set containing	

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adopting the proposal to include Limiting Criteria into the ICA data portal results. GPI filed comments highlighting the barriers of Data Portal access posed by registration requirements and recommending the removal of such requirements. GPI's comments are cited in the Staff Proposal (3/13/2024) and D.24-10-030 as contributing to the origination of the proposal and adoption background and rational, respectively. GPI's comments made substantial contributions which led to the D.24-10-030 requirement to remove registration requirements for Data portal access. Similarly, GPI supported the staff proposal that requires all utilities to apply the 15/15 rule as proposed in the July 2018 Ruling. GPI's support contributed to the adoption of this proposal in D.24-10-030. GPI supported the staff proposal recommendations to enable downloadable generation ICA results that allowed for development of LGP and otherwise made substantial contributions that the proposal required complementary ICA improvements. GPI comments, cited in D.24-10-030, made substantial contributions	15 customers with no customer receiving no more than 15 percent of the load. [D.24-10-030, pg. 152.] This decision adopts the proposal to require Utilities to modify ICA maps to enable straightforward customer creation of Limited Generation Profiles. Pg. 152. GPI supports this proposal, noting that for the proposal to work, the ICA interface has to include the Limited Generation Profile options, at least for the download. [D.24-10-030, pg. 154.] GPI and EDF/NRDC support this proposal as part of the Limited Generation Profile actions necessary for viability. ... Accordingly, this decision directs Utilities to modify ICA methodology to make use of Limited Generation Profiles for queued and active export-limited distributed energy resources. [D.24-10-030, pgs. 158-9.] In comments to the proposed decision, Green Power Institute asserts that ICA quality assurance and quality control have decreased and requests that the workshops include a discussion of how ICA accuracy can be quantified and assessed in order to make ICA data actionable for users. Pg. 166. The Commission agrees that the original proposal is too narrow to achieve the objective of improved accuracy of the ICA data portals. The Commission also agrees that the proposed required data and interconnection data are not comparable and appending the proposed report to the quarterly interconnection report would be	

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leading to the adoption of this and related proposals in D.24-10-030. GPI has consistently advocated for an ICA capable of supporting targeted use cases that include generation and load interconnection (energization). GPI comments recommended improving ICA accuracy towards its application for utility energization interconnection processes, ICA load accuracy testing relevant to EV charging stations, developing actionable definition of accuracy that animate the application of ICA in utility business processes, and calls for additional guidance on the appropriate venue to address ongoing DER energization issues. While not all of GPIs recommendations were adopted, our support and recommendations to provide guidance on where energization interconnection issues fall into the scope of R.21-06-017, and for moving the ICA towards accurate and actionable interconnection use cases are addressed by D.24-10-030, Section 3.26.	complicated. However, the need to improve the accuracy of the ICA data portals remains an objective. [D.24-10-030, pg. 164.] Pleadings Registration requirements may present a significant hurdle to accessing the ICA maps and are unnecessary. SCE's map has no registration requirements and they've reported no issues as far as we are aware. This history suggests that other IOUs don't need to impose registration requirements. PG&E and SDG&E should mirror this approach and remove their registration requirements. [Comments, 5/22/2023, pg. 13.] GPI recommends that a number of proxy DER projects be developed to test the accuracy of ICA data with respect to Fast Track interconnection, as follows: • A 100 kW behind-the-meter solar project • A 3 MW front-of-meter solar project • A 100 kW behind-the-meter battery storage project • A 3 MW/12 MWh front-of-meter battery storage project • A 300 kW EV charging station • A 3 MW EV charging station To be considered accurate and actionable, the ICA data for these proxy projects should be within 90% of the Fast Track screening results – but for only the Fast Track screens that	

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	are included within the ICA data. As of 2022, the Rule 21 Fast Track screens were modified to substitute ICA results as the Screen M and Screen N results. [Comments, 5/22/2023, pg. 15-16.] The most critical improvements are, in order of importance: 1. Accuracy of ICA data – it needs to be “actionable,” which means it agrees at least roughly with Fast Track screen or detailed study results (but taking into account the fact that ICA only includes some of the Fast Track screens) 2. Ensure ongoing accuracy of ICA data with regular updates and ongoing evaluations [Comments, 5/22/2023, pg. 18] GPI recommends a different approach and a different definition of accuracy. We would define accuracy in this context as: “ICA data will be considered accurate when the analysis conducted by ICA matches reasonably well with the interconnection study process or Fast Track screens, taking into account the fact that ICA is only part of the overall interconnection study process.” To achieve accuracy per this meaning it may require that the ICA methodology is modified to include additional Fast Track screens. [Comments 6/5/2023, pg. 4] Green Power Institute GPI expressed support for this in their Ruling 2 Ques on 1 response: “Critical improvements, ordered by importance:	

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	1. Accuracy and actionable ICA data” – adding these data will help make the ICA more actionable and help guide accuracy improvements. [Staff Proposal, 3/13/2024, pg. 110.] Staff proposal 4: “Commission shall order IOUs to add functionality to the ICA maps enabling customers to download a file containing the subset of Generation ICA results needed to develop an LGP. The file for customers to download should mirror the structure of that which the IOUs propose for the customers to submit in their interconnection applications. The file should be filled in with all the data that is required, and then leave a column open for the customer-generated LGP.” GPI supports. We note also that an early-stage LGP option was recently adopted in final Resolution E-5296 (March 21, 2024), but that more work needs to be done to make this new LGP option viable, and some parties protested significant aspects of the draft resolution (CalSSA and IREC), with only some of their recommendations being adopted in the final resolution. For this solution to work, even on a pilot or exploratory basis, it will be necessary for the ICA interface to include the LGP options, at the least for download. [Comments, 5/28/2024, pg. 16; Comments, 6/22/2024, pgs. 22-23] The Proposed Decision does not go far enough in Section 3.24 to remedy the ongoing issue that the ICA is not functional for informing either generation or load DER interconnection. As verified by	

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	Verdant and stated in the PD, the ICA maps are known to be inaccurate to the point that they are unusable for their intended purpose. GPI has raised concerns about ICA accuracy since the beginning of R.14-08-013 and a working group was convened in that same proceeding to identify actionable tasks to remedy ICA issues. In 2019, GPI provided the following comments on improving ICA accuracy, which we reproduce here given how salient they remain today: ... [Comments 10/3/2024, pg. 8.]	
3. Streamlining the Distribution Planning and Execution Process (DPEP) GPI significantly influenced the CPUC's improvements to the DPEP by addressing the need for efficient distribution planning that accommodates DER integration and aligns with state electrification goals. Through its proposals, comments and collaboration, GPI supported specific procedural enhancements, such as prioritizing project execution, scenario-based project forecasting, and bridging strategies to address energization bottlenecks, among other recommendations. The Decision reflects these contributions by requiring utilities to establish prioritization methods, a long-term planning horizon,	Decision D.24-10-030 The purpose of Rulemaking 21-06-017 is to prepare the electric grid for a high number of distributed energy resources. In establishing this proceeding, the Commission recognized the need to review utility distribution planning processes. Track 1, Phase 1 of this proceeding has focused on near-term improvements to the distribution planning and execution process (DPEP). [D.24-10-030, pg. 2.] With respect to the DPEP, Utilities are directed to [only selected bullets shown]: • Use reliable bottom-up data to estimate load growth in a given year, defining reliable bottom-up data as customer energization requests and potentially certain types of pending loads, and allowing the estimate to exceed the forecasted load growth that is based on the Integrated Energy Policy Report (IEPR) data, with	Verified

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
and improved disaggregation methodologies to anticipate grid needs more accurately. GPI's contributions were instrumental in shaping the adopted DPEP improvements, emphasizing transparency and adaptability in the face of rising DER deployments. GPI provided substantial contributions in informal and formal opening comments that advocated for applying the most recently available IEPR forecasts in the DIDF and DPEP. GPI informal comments on the annual Joint Utility Request for IEPR Datasets supported the request to apply the most up-to-date available IEPR forecast to inform the DIDF and GNA/DDOR distribution planning processes therein. GPI provided substantial contributions advocating for bottom-up known load data usage in the DIDF and Distribution planning process (DPP or DPEP) in informal and opening and reply comments that contributed to its inclusion as a DPEP improvement in D.24-10-030.	guardrails. The decision allows Utilities to select a newer IEPR vintage to use in distribution planning. • Implement the use of scenario planning in the DPEP beginning with the 2025-2026 Distribution Planning Process (DPP) cycle. • Submit an annual community engagement plan to address equity in the DPEP. • Include metrics to evaluate equity in utility distribution plan reporting. [D.24-10-030, pgs. 2-4.] The DPEP is a ten-step process that can be divided into the five-step Distribution Planning Process (DPP) (where Utilities forecast future load on the distribution system and determine when and where upgrades will be needed) and the five-step Execution Process (where solutions are designed, prioritized, and constructed.) [D.24-10-030, pgs. 11-12.] Require Utilities to Create a Pending Loads Category in the DPP...The Staff Proposal recommends that the Commission require Utilities to develop and implement a pending loads category in their DPP that would be informed by existing coordination efforts, planning programs, and an aggregation of publicly available information. Explaining that pending loads are less certain than a known load (<i>e.g.</i>, a customer request for service) but more certain than economic disaggregation of the IEPR forecast based on trends, the Staff	

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	Proposal asserts that creating a pending loads category will inform scenario planning and increase utility awareness of where loads will likely appear in the mid-term years (<i>i.e.</i>, year two through year five) of the DPP. With a goal of balancing the reliability of current information with the importance of proactive planning and investment. [D.24-10-030, pgs. 65-66.] Pleadings We again recommend that the IOUs and Commission commit to a “proactive” approach in DPP and to the buildout of distribution capacity deemed required to meet the expected boom in growth in DERs of various kinds in each utility service area. This approach constitutes a “win/win” for IOUs and ratepayers because IOUs benefit from higher ratebase, and ratepayers benefit from higher deployment of cost-effective and local DERs that are able to interconnect more easily and in shorter timeframes. [Comments 5/22/2023, pg. 4.] GPI recommends requiring that all IOUs provide known and economic load growth figures with comparisons to IEPR low-, mid-, and high annual and cumulative load growth. These Figures should be equivalent to the 2023 IPE Post-DPAG Report Figure 2-3 SCE Annual Load Growth 2022 DIDF, Figure 2-4 SCE Cumulative Load Growth 2022 DIDF, and Figures 2-7 and 2-8 (Total known embedded and incremental loads in MW and percent, respectively). These graphical data will inform the review of DIDF	

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	known load allocation methods, load forecast certainty, and will also increase transparency by displaying both bottom-up and top-down load forecast elements. These data will also facilitate the alignment of IEPR forecast selection and scenario modeling for DPP, Integrated Resources Planning (IRP), and Resource Adequacy (RA) purposes. [Comments, 5/22/2023, pg. 26.] GPI also supports, due to similar reasoning, including in Part 2 a number of more realistic “sensitivity analyses” or different scenarios, including, for example: 1) a high TE case where TE takes place even faster than expected (data over the last two years suggests TE is accelerating); 2) a high BTM case where BTM DERs, primarily solar and battery storage, are installed at a faster pace than in the reference case; 3) a high demand case where, e.g., air conditioning and other appliance demands grow even faster than in the reference case; 4) others as appropriate. [Comments, 8/7/2023, pg. 3.] GPI supports these additional recommendations and agree that adding a robust and data-based “pending loads” category to DPP could be an important way to accelerate proactive energization efforts for charging and similar loads. [Comments, 6/18/2024, pg. 4.] Scenario Planning: ...GPI is especially concerned that a Utility Tier 3 AL summary of the workshop that determines the “outcomes”, a “proposed framework for	

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	implementation”, and “steps to be taken to facilitate the transition” should not be left up to the IOUs. The post-workshop implementation method proposed in the PD gives Utilities too much agency in determining how they choose to implement scenario planning in the DPP, fails to ensure the methods will be unified, and eliminates Commission guidance. The outcome is most likely to reflect Utility preference. A workshop is not the appropriate forum for providing IOUs the go-ahead to establish the requirements or guidelines for implementation. The PD should eliminate AL Tier 3 “summary” items 2-4 and instead the Commission should make a separate determination (Ruling or Decision) on implementation requirements followed by a subsequent utility filing detailing “the steps to be taken to facilitate the transition to using scenarios and a timeline for using them in the 2025-2026 DPP cycle.” [Comments, 10/3/2024, pg. 14.] The staff proposal and PD correctly identify a critical intersection between distribution system wildfire mitigation work and the application of improved longer forecasts for future proofing any and all DPP investments. We strongly support the intention to “Require Utilities to consider Distribution Planning Results in Other Distribution Work” This type of integrated planning is critical to concurrent and timely distribution system expansion, wildfire mitigation, and ratepayer cost considerations whether the driver is increasing	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
	customer demand in high wildfire risk areas (DPP initiated needs) or upgrades to the pre-existing Distribution system for wildfire mitigation proposes (Wildfire Mitigation Plan initiated needs). [Comments, 10/8/2024, pgs. 4-6.]	
4. Enhancements to the Distribution Investment Deferral Framework (DIDF) In its comments and proposals in R.21-06-017, GPI addressed critical updates needed within the DIDF to better leverage distributed energy resources for investment deferrals, and to improve utilities' distribution capacity planning. GPI advocated for data-sharing improvements and enhanced tracking of deferred investment outcomes, ultimately leading to CPUC's adoption of new reporting metrics for tracking distribution deferral projects and assessing community engagement impacts. These metrics now ensure that deferral opportunities are not only identified but actively monitored to maximize efficiency and stakeholder involvement. GPI provided substantial contributions to the Commission directed Track 1 Phase 1 effort to explore	Decision D.24-10-030 This decision adopts the Staff Proposal recommendation to refocus the entire DIDF process from a distribution investment deferral solicitation process to a process focused on the facilitation of improving transparency of the DPP and monitoring distribution planning improvements. [D.24-10-030, pg. 116.] Pleadings To what extent should this proceeding further examine the utility DPP, moving beyond the current DIDF focus? This proceeding should continue review of DPP procedures, including this review as a separate item in the final scoping memo, and should also move beyond the DIDF focus to look at all aspects of the DPP that may impact the high DER future that is the focus of this proceeding. Should the Commission evolve the DIDF into a broader DPP that captures additional value from DER services beyond distribution deferral and focuses more broadly on DER siting optimization? Yes. [Comments, 8/16/2021, pgs. 7-8.] GPI strongly agrees with the IPE that the EV charging load data and request latency revealed by SCE's known load	Not Verified; The Commission's determinations in D.24-10-030 did not rely upon or reflect analysis or proposals from GPI on this issue, and GPI's submissions did not substantially contribute or materially enrich the record. <i>See</i> Part III.D CPUC Comments, Disallowances and Adjustments [6, 7].

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
possible improvements to DIDF efficacy as well as current grid needs forecasting and identification methods. GPI comments were extensively considered and incorporated into the contracted Kevala DIDF evaluation and recommendation report (11/14/2022). At the same time, GPI has consistently made substantial contributions advocating for moving beyond the DIDF to address broader DPEP implementation issues in support of widespread DER adoption and integration. GPI comments have specifically recommended retaining the most valuable and newly transparent components of the DIDF, namely the GNA and known load data, and expanding their application to improving the DPP beyond a singular focus on the DIDF.	data is highly valuable. These data indicate a need for scenario-based Distribution planning that includes application in the DIDF, but should also go beyond the DIDF to inform updated distribution planning process, tools (e.g. ICA-Load), and frameworks that facilitate EV charger interconnection requests via preemptive, versus reactive, grid readiness. We therefore recommend requiring scenario modeling in the 2023/2024 DIDF cycle. It should be anticipated that this process and its breadth of application will require multiple DIDF cycles for implementation/refinement and therefore should begin as soon as possible. [Comments 5/22/2023, pg. 30.] GPI supports the proposal to pause the DIDF DPAG meeting and project-specific candidate deferral opportunity (CDO) review process, in order to reallocate time for stakeholders and the CPUC to focus on reviewing the merits of broader DPP reform, in addition to the methods underlying the DIDF grid needs assessment and deferral opportunity identification and selection. [Comments 5/22/2023, pg. 32.] GPI supports pausing the DIDF but does not support the complete cancellation of DIDF reform at this time. The DIDF may have value in distribution planning at some point in the future. GPI therefore supports pausing and de-prioritizing DIDF reform in Track 1 Phase 2 in order to focus on other in scope Distribution	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
	Planning Process improvements. The potential transformation of the DIDF, or ground-up development of a DPP transparency program will require significant additional deliberation between the parties. [Comments, 6/18/2024, pg. 14] GPI supports the PD's recommendation to shift the focus of the DIDF from investment deferral to facilitating transparency in distribution planning. However, we suggest the following modifications: ... [Comments, 10/3/2024, pg. 15.] GPI agrees that alternative approaches to promoting DER integration and deferral should be explored. While GPI supports shifting the focus of the DIDF from investment deferral to facilitating transparency in distribution planning, we agree that DER integration should remain a priority. We recommend a phased transition for DIDF reform and the development of a new, more comprehensive distribution planning transparency framework that retains key reporting elements such as the Grid Needs Assessment. [Comments, 10/8/2024, pg. 4.]	
5. Strengthening Utility-Community Communications and Equity Considerations GPI emphasized the importance of community engagement in distribution planning and advocated for equity-focused distribution metrics. Its contributions	Decision D.24-10-030 In response, Green Power Institute and EDF/NRDC oppose the revision to the advice letter tier level and removal of project costs and risk-adjusted benefits language. Green Power Institute argues the workshops and Tier 3 advice letter will improve transparency. Improved transparency is a priority objective in this process.	Verified

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
included recommendations for public-access data portals, streamlined interconnection procedures and communications, and development of community engagement plans. The Decision incorporates these contributions by mandating utilities to submit annual community engagement plans and establishing metrics to evaluate equity within distribution planning. GPI's advocacy ensured that local communities are meaningfully involved in distribution planning decisions that affect their regions and that equity considerations are embedded within CPUC's regulatory approach. GPI has supported integrating specific equity metrics and analyses in DPP process and DER integration studies from the outset of the HDER proceeding. Substantive recommendations include analytical tools for measuring equity across different higher DER integration scenarios, consistent integration of equity consideration in guiding working papers (e.g. the EIS), and explicit support for the staff proposal to include equity metrics in the GNA report. GPI support for the staff proposal on equity metric reporting requirements	Hence, the Commission is not persuaded by the calls for less transparency. [D.24-10-030, pgs. 87-8.] This decision adopts the proposal to require Utilities to submit annual community engagement plans to address equity in the DPP. The Commission anticipates this proposal will facilitate Utilities in developing a standardized and consistent outreach program. As discussed below, the Commission clarifies that coordination and customer outreach efforts are a minimum requirement of the pending loads category. [D.24-10-030, pg. 106.] This decision adopts the proposal to require Utilities to include metrics to evaluate equity in utility distribution plan reporting. The record indicates value in exploring these metrics to analyze equity in the DPP. The Commission agrees that additional stakeholder details are required and directs Utilities to hold a workshop to develop these details. [D.24-10-030, pg. 119.] Tesla and GPI also support this proposal. ... Based on the support indicated by the record, this decision adopts the proposal to require Utilities to annually evaluate equity in distribution plan reporting. There is value in exploring these metrics to annually analyze equity in the DPP. [D.24-10-030, pg. 121.] Pleadings GPI agrees that equity should be a major focus in the finalized Part 1 and	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
in the GNA/DDOR process was indicated as a contributing factor for including this new reporting requirement in D.24-10-030.	Part 2. DERS have significant upside potential in helping mitigate historical inequities in green energy policies and access to clean power and clean transportation. While much of this mitigation will happen naturally without explicit discussion, given the nature of the debates around equity in other proceedings such as the EV proceeding and microgrids proceeding it is necessary also to explicitly address equity concerns in the High DER context. [Comments, 8/7/2023, pg. 4.] Another significant benefit from reconductoring may be improved wildfire mitigation, which mirrors a strong state policy push to harden the grid against wildfires. [Comments, 6/24/2024, pg. 15.] GPI supports the proposal to require utilities to include the proposed equity metrics in the GNA. The Staff Proposal recommends initiating this requirement in the 2025 GNA. If the Commission makes a timely decision (e.g. early to mid-June) to suspend DIDF solicitations in the 2024/2025 DIDF cycle, GPI recommends requiring the IOUs to include these metrics in the August 15, 2024 GNA filing, since utilities should have additional time due to the suspension. [Comments, 06/22/2024, pg. 19.] The staff proposal and PD correctly identify a critical intersection between distribution system wildfire mitigation work and the application of improved longer forecasts for future proofing any and all DPP investments. We strongly support the intention to	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
	“Require Utilities to consider Distribution Planning Results in Other Distribution Work” This type of integrated planning is critical to concurrent and timely distribution system expansion, wildfire mitigation, and ratepayer cost considerations whether the driver is increasing customer demand in high wildfire risk areas (DPP initiated needs) or upgrades to the pre-existing Distribution system for wildfire mitigation proposes (Wildfire Mitigation Plan initiated needs)....We have previously raised these concerns in the DRP, HDER, and WMP development processes and look forward to additional engagement via both the WMP and HDER proceeding to ensure that integrated planning supports distribution system future proofing in wildfire risk areas. [Comments, 10/8/2024, pg. 5.]	

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	Noted
c. If so, provide name of other parties: CalCCA, CCUE, Clean Coalition, EDF, IREC, NRDC, SBUA, UCAN, Vehicle-Grid Integration Council, Vote Solar.		Noted
d. Intervenor's claim of non-duplication: This proceeding covers a variety of topics related to the HDER program in California. The Green Power Institute has been an active participant in the Commission's RPS and LTPP/IRP proceedings, and a number of other		Noted; <i>See</i> Part III.D CPUC Comments, Disallowances

	Intervenor's Assertion	CPUC Discussion
	proceedings related to renewable energy, including distributed energy resources. 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. We held numerous individual calls and conference calls with fellow parties regarding various issues that were under consideration over the past three plus years in this proceeding. 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.	and Adjustments [6, 7].

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: GPI is providing, in Attachment 2, a listing of all of the pleadings that we provided in this Proceeding 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 Decision D.24-10-030. The hours claimed herein in support of Decision D.24-10-030 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	Noted; <i>See</i> Part III.D CPUC Comments, Disallowances and Adjustments [6, 7, 9].

	CPUC Discussion
environmental impacts of electric power generation. Dr. Morris holds a BA in Natural Science from the University of Pennsylvania, an 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. Mr. Hunt is a renewable energy law and policy expert with substantial experience in California, in local energy planning and in state energy-policy development. He has worked with local governments throughout Southern California, in his current role with Community Renewable Solutions LLC and in his previous role as Energy Program Director for the Community Environmental Council, a well-known non-profit organization based in Santa Barbara. Mr. Hunt was the lead author of the Community Environmental Council's A New Energy Direction, a blueprint for Santa Barbara County to wean itself from fossil fuels by 2030. Mr. Hunt also contributes substantially to state policy, in Sacramento at the Legislature, and in San Francisco at the California Public Utilities Commission, in various proceedings related to renewable energy, energy efficiency, community-scale energy projects, and climate change policy. Mr. Hunt is also a Lecturer in Climate Change Law and Policy at UC Santa Barbara's Bren School of Environmental Science & Management (a graduate-level program) from 2007-2014. He received his law degree from the UCLA School of Law in 2001, where he was chief managing director of the Journal for International Law and Foreign Affairs. Mr. Hunt is a regular columnist at GreenTechMedia.com. 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.	

	CPUC Discussion
Dr. Harrold earned a Ph.D. in geomicrobiology from the University of Washington, Department of Earth and Space Science in 2014. Mr. Chiacos is the Director of Climate Policy at Community Environmental Council and is a clean energy and electric vehicle expert and consultant with more than 20 years of experience and accomplishments in the electric vehicle and clean energy fields. In 2010, he founded ElectricDrive805, which is the official EV Readiness group for the Central Coast region of Ventura, Santa Barbara, and San Luis Obispo counties. Mr. Chiacos has led development of multiple regional EV Readiness Plans, funded by the California Energy Commission, and has worked with dozens of local businesses and governments to develop EV friendly policies and install charging stations. Mr. Chiacos has also led dozens of consumer facing EV education events annually such as National Drive Electric Week and the Santa Barbara Green Car Show, which attracts 35,000 people as part of Earth Day and features over 40 EVs and a Ride and Drive. Mr. Chiacos also has extensive lived experience with plug-in vehicles, having driven them since 2012. Mr. White is an expert on emissions, air quality and energy issues. He has worked on these topics for over 25 years. For the past twelve years, Mr. White has been primarily engaged on policy matters related to transmission, distribution, and electric generation resources, and the intersection of the electric sector with climate, environmental, and equity issues. Prior to consulting for Sierra Club, Mr. White worked at the Clean Coalition as Director of Policy and Economic Analysis, where he developed regulatory and legislative analysis and proposals across a dozen states and an equal number of municipal utility jurisdictions, with a primary focus on California regulatory issues. Additionally, Mr. White has been the lead analyst for several U.S. Department of Energy, New York State Energy Research and Development Authority and the California Energy Commission Electric Program Investment Charge studies. Mr. White has a Bachelor of Science from the University of Michigan, two years of graduate level social studies of science and technology at the Massachusetts Institute of Technology, and an additional two years in Environmental Science at San Jose State University. 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	

	CPUC Discussion										
finding that the overall benefits of a customer's participation will exceed a customer's costs." This proceeding is concerned with the development of distributed energy resources in California, and the readying of the grid to accommodate that development. The cost reductions and environmental benefits of distributed renewable energy resources overwhelm the cost of our participation.											
b. Reasonableness of hours claimed: The GPI made Significant Contributions to Decision D.24-10-030 by providing a variety of filings on the topics under consideration, participated in meetings and workshops, and filed comments and replies on the PD. 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.	Noted; <i>See</i> Part III.D CPUC Comments, Disallowances and Adjustments [6, 7].										
c. Allocation of hours by issue: <table> <tr> <td>1. Improved Demand and Load Growth Forecasting</td><td>15%</td></tr> <tr> <td>2. Integration Capacity Analysis (ICA) and Hosting Capacity Improvements</td><td>35%</td></tr> <tr> <td>3. Streamlining the Distribution Planning and Execution Process (DPEP)</td><td>20%</td></tr> <tr> <td>4. Enhancements to the Distribution Investment Deferral Framework (DIDF)</td><td>20%</td></tr> <tr> <td>5. Strengthening Utility-Community Communications and Equity Considerations</td><td>10%</td></tr> </table>	1. Improved Demand and Load Growth Forecasting	15%	2. Integration Capacity Analysis (ICA) and Hosting Capacity Improvements	35%	3. Streamlining the Distribution Planning and Execution Process (DPEP)	20%	4. Enhancements to the Distribution Investment Deferral Framework (DIDF)	20%	5. Strengthening Utility-Community Communications and Equity Considerations	10%	Noted; totals 100%.
1. Improved Demand and Load Growth Forecasting	15%										
2. Integration Capacity Analysis (ICA) and Hosting Capacity Improvements	35%										
3. Streamlining the Distribution Planning and Execution Process (DPEP)	20%										
4. Enhancements to the Distribution Investment Deferral Framework (DIDF)	20%										
5. Strengthening Utility-Community Communications and Equity Considerations	10%										

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
G. Morris	2021	10.00	\$450	D.22-06-041	\$4,500	1.37 [6, 7]	\$440.00 [1]	\$602.80
G. Morris	2022	15.50	\$465	D.23-11-036	\$7,208	6.2 [6, 7]	\$450.00 [1]	\$2,790.00
G. Morris	2023	9.50	\$485	D.24-04-036	\$4,608	4.15 [6, 7]	\$460.00 [1]	\$1,909.00
G. Morris	2024	11.00	\$505	See comment 1	\$5,555	4.72 [6, 7]	\$475.00 [1]	\$2,242.00
T. Hunt	2021	63.50	\$585	D.22-06-041	\$37,148	22.38 [6, 7]	\$475.00 [2]	\$10,630.50
T. Hunt	2022	110.25	\$605	D.23-11-036	\$66,701	30.97 [6, 7]	\$605.00 [2]	\$18,736.85
T. Hunt	2023	139.75	\$630	D.24-04-036	\$88,043	45.12 [6, 7]	\$630.00 [2]	\$28,425.60
T. Hunt	2024	153.75	\$695	See comment 2	\$106,856	48.66 [6, 7]	\$655.00 [2]	\$31,872.30
Z. Harrold	2021	18.00	\$225	D.22-06-042	\$4,050	3.57 [6, 7]	\$225.00 [3]	\$803.25
Z. Harrold	2022	63.50	\$250	D.24-07-027	\$15,875	14.38 [6, 7]	\$250.00 [3]	\$3,595.00
Z. Harrold	2023	44.75	\$325	See comment 3	\$14,544	19.69 [6, 7]	\$260.00 [3]	\$5,119.40
Z. Harrold	2024	55.75	\$340	See comment 3	\$18,955	16.55 [6, 7]	\$325.00 [3]	\$5,378.75
M. Chiacos	2022	13.75	\$290	D.24-04-027	\$3,988	0.00 [6]	N/A [4]	\$0.00
M. Chiacos	2023	10.25	\$305	See comment 4	\$3,126	0.00 [6]	N/A [4]	\$0.00
M. Chiacos	2024	6.75	\$315	See comment 4	\$2,126	4.39 [6]	\$380.00 [4]	\$1,668.20
S. White	2021	2.00	\$550	See comment 5	\$1,100	1.65 [6]	\$375.00 [5]	\$618.75

CLAIMED						CPUC AWARD		
S. White	2022	7.50	\$570	See comment 5	\$4,275	7.5	\$375.00 [5]	\$2,812.50
S. White	2023	12.50	\$595	See comment 5	\$7,438	8.42 [6]	\$375.00 [5]	\$3,157.50
Subtotal: \$396,094 ³						Subtotal 1: \$120,362.40		
						Adjustment: -\$1,971.00 [9]		
						Subtotal 2: \$118,391.40		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
G. Morris	2024	28.00 ⁴	\$252.5	½ 2024 rate	\$7,070 ⁴	13.00 [8]	\$237.50 [1]	\$3,087.50
Subtotal: \$7,070 ⁴						Subtotal: \$3,087.50		
TOTAL REQUEST: \$403,164 ⁵						TOTAL AWARD: \$121,478.90		
*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 ⁶		Member Number		Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation			
Tamlyn Hunt	November 2001 ⁷		218673		No			

³ Per GPI's time records and information provided in Part III.B, GPI's subtotal amount equals \$396,093.75. We remind GPI to not round up in their calculations.

⁴ Per GPI's time records, Morris' Intervenor Compensation (IComp) Claim Preparation hours total 47.00 in 2024. Morris' total dollar amount requested for IComp Claim Preparation in 2024 equals \$11,867.50.

⁵ Per GPI's time records and information provided here in Part III.B, GPI's total request amount equals \$407,961.25. We request GPI to not round up in their dollar amount calculations.

⁶ This information may be obtained through the State Bar of California's website at <https://apps.calbar.ca.gov/attorney/LicenseeSearch/QuickSearch>.

⁷ The State Bar of California's website shows the correct admission date for Hunt is January 29, 2002.

C. Attachments Documenting Specific Claim and Comments on Part III:⁸

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
Attachment 4	Resume for Sahm White
Comment 1	The Commission has adopted a 4.07 percent adjustment for rates in the Market Rate Study for converting the 2023 to 2024 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 4.07 percent escalator to the approved 2023 hourly rate for Dr. Morris, which is \$485/hr (D.24-04-036), and round to the nearest 5 percent for 2024 per established Commission practice to produce a rate of \$505/hr.
Comment 2	Mr. Hunt has had his status upgraded in 2024 to GPI Legal Director. The level V range in the Commission's Hourly Rate Chart for this category for 2024 is \$616-971/hr, with a median value of \$794/hr. We are requesting a 2024 rate for Mr. Hunt as GPI Legal Director of \$695/hr.
Comment 3	Dr. Harrold's most recently approved rate is \$250/hr for 2022 (D.24-07-027). D.24-07-027 notes that Dr. Harrold is eligible to move up in 2023 from level 3 to level 4 in the category of Public Policy Analyst. GPI currently has a request for Dr. Harrold's rate as a level 4 for 2023 on file, pending the first Decision rendered that includes hours for Dr. Harrold for 2023. The request is for \$325/hr. If our request is met in full, that would lead to a 2024 rate of 340/hr, applying the 4.07 percent escalator and rounding to the nearest five.
Comment 4	Mr. Chiacos has a Commission approved rate for 2022 of \$290/hr (D.24-04-027). For 2023 and 2024 rates we apply the 4.46 and 4.07 percent escalators from the Commission's Hourly Rate Chart for 2023 and 2024 and round to the nearest 5 per regular Commission practice, which produces a 2023 rate of \$305/hr, and a 2024 rate of \$315/hr.
Comment 5	Mr. White qualifies as a Level V Public Policy Analyst. The level V range in the Commission's Hourly Rate Chart for this category for 2021 is \$492-869/hr, with a median value of \$651/hr. We are requesting a 2021 rate for Mr. White of \$550/hr. For 2023 and 2024 rates we apply the 4.46 and 4.07 percent escalators from the Commission's Hourly Rate Chart for 2023 and 2024 and round to the nearest 5 per regular Commission

⁸ Attachments are not included in the final decision.

Attachment or Comment #	Description/Comment
	practice, which produces a 2022 rate of \$570/hr, and a 2023 rate of \$595/hr. Mr. White's resume is included as Attachment 4 to this claim.

D. CPUC Comments, Disallowances, and Adjustments

On September 16, 2025, a ruling was issued requesting GPI to submit additional information for various claims because the Commission had identified several issues within the claims, including: omission of requested information, unclear or 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 (broken down by claim), and consultant agreements for those retained on a contingency basis, where payment of consulting fees is deferred and contingent upon the receipt of an IComp award.

GPI filed its response for supplement information for this proceeding on October 20, 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.⁹ (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.

⁹ Public records found at Alameda County Clerk Recorder Office's reflect that fictitious business name Green Power Institute, was active from 6/11/2013 to 6/11/2018 and is currently expired.

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 an assessment of GPI's contribution to the decision.

Item	Reason
[1] Greg Morris' (Morris) 2021, 2022, 2023 and 2024 Hourly Rates	GPI identifies Morris as the director of GPI and confirms that he is not an employee of GPI. 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 is \$169.05-\$442.37 for 2021, \$178.43 - \$451.75 for 2022, \$191.49 - \$464.81 for 2023, and \$203.94 - \$477.26 for 2024. Given Morris' experience, we approve an hourly rate of \$440 for 2021, \$450 for 2022, \$460 for 2023, and \$475 for 2024. We apply one-half of Morris' adopted 2024 rate of \$475.00 for an Intervenor Compensation Claim Preparation rate of \$237.50.
[2] Tamyln Hunt' (Hunt) 2021, 2022, 2023, and 2024 Hourly Rates	Although GPI continues to identify Hunt as a staff associate of GPI, or a "contract employee," supplemental information provided confirms that Hunt works for Community Renewables Solutions LLC, 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 Hunt. GPI filed the "Associate Service Agreement Addendum"¹⁰ between Future

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 Community Renewables Solutions LLC (Hunt), 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.

Item	Reason
	Resources Associates (Morris) and Community Renewables Solutions LLC (Hunt) under seal, but states that per the terms of the contract, Hunt has been hired on a contingency basis, where Hunt receives an initial payment upon invoicing, followed by a second payment contingent upon this intervenor compensation award. Based on these terms, we approve an hourly rate of \$475 for 2021, \$605 for 2022, \$630 for 2023, and \$655 for 2024. 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 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 in the initial claim and waited until the Commission requested supplemental documentation, which significantly delayed the processing of this claim.
[3] Zoe Harrold’s (Harrold) 2021, 2022, 2023 and 2024 Hourly Rates	Although GPI continues to identify Harrold as a staff associate of GPI, or a “contract employee,” 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”¹¹ 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,

¹¹ Because the Associate Service Agreement Addendum between Future Resources Associates and Harrold was filed under seal, we do not disclose here how the reduction is specifically calculated.

Item	Reason
	followed by a second payment contingent upon this intervenor compensation award. Based on these terms, we approve an hourly rate of \$225 for 2021, \$250 for 2022, \$260 for 2023, and \$325 for 2024. 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 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 in the initial claim and waited until the Commission requested supplemental documentation, which significantly delayed the processing of this claim.
[4] Michael Chiacos’ (Chiacos) 2024 Hourly Rate	GPI identifies Chiacos as a staff associate of GPI or a “contract employee,” but supplemental information provided confirms that Chiacos works as a consultant, who in turn bills Future Resources Associates (not GPI or the Pacific Institute) for work in this proceeding. In response to the September 16, 2025, ruling directing GPI to submit additional information for various claims, GPI states that no written agreement exists for Chiacos’ consulting services. However, GPI claims that Chiacos has been hired on a contingency basis, where Chiacos receives an initial payment upon invoicing, followed by a second payment contingent upon this intervenor compensation award. GPI provided invoices for Chiacos’ consulting services for this proceeding. Based on these terms, we approve an hourly rate of \$380 for 2024. Because we do not award any hours for Chiacos’ work in 2022 and 2023, we do not establish an hourly rate for those years.

Item	Reason
	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 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 in the initial claim and waited until the Commission requested supplemental documentation, which significantly delayed the processing of this claim.
[5] Sahm White's (White) 2021, 2022, and 2023 Hourly Rates	Although GPI continues to identify White as a staff associate of GPI, supplemental information provided confirms that White works as a consultant, who in turn bills Future Resources Associates, (not GPI or the Pacific Institute) for work in this proceeding. In response to the September 16, 2025 ruling directing GPI to submit additional information for various claims, GPI states that no written agreement exists for White's consulting services. However, GPI claims that White has been hired on a contingency basis, where White receives an initial payment upon invoicing, followed by a second payment contingent upon this intervenor compensation award. GPI provided invoices for White's consulting services for this proceeding. Based on these terms, we approve an hourly rate of \$375 for 2021, 2022, and 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,

Item	Reason
	to adhere to the Commission’s policy on compensation for consultant fees, and to provide the appropriate documentation with the initial claim to ensure efficient processing, and thus avoid the need for the Commission to request supplemental documentation. In this instance, GPI did not provide all the documentation pertaining to the contract terms in the initial claim and waited until the Commission requested supplemental documentation, which significantly delayed the processing of this claim.
[6] Lack of Substantial Contribution – GPI Claimed Issues 1 and 4	Public Utilities Code § 1802(j) states that a substantial contribution “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 evaluating whether GPI made a substantial contribution here, the Commission evaluates whether the hours claimed were commensurate with the contributions claimed by the intervenor. Making a substantial contribution in and of itself does not entitle an intervenor to all its claimed fees and costs. Compensation is granted for efficient, meaningful contributions. In D.24-10-030, the Commission adopted several important reforms related to Improved Demand and Load Growth Forecasting (GPI’s claimed Issue 1), and the Distribution Investment Deferral Framework (DIDF) (GPI’s claimed Issue 4). While GPI participated in these issues, we find that its contributions towards Issue 1 and Issue 4 did not substantially contribute to this proceeding. The Commission finds that GPI did not make a substantial contribution to Issue 1. While GPI submitted comments addressing demand and load growth forecasting, the Commission’s determinations in D.24-10-030 did not rely upon the comments from GPI. GPI’s recommendations did not offer any materially distinct

Item	Reason
	forecasting methodologies, data, or analysis that enriched the record. Instead, GPI's submissions largely repeated general policy considerations and concerns on the issues that were already presented before the Commission by parties such as Cal Advocates, CalCCA, and Clean Coalition. As such, all hours claimed by GPI towards Issue 1 are reduced. The Commission finds that GPI did not make a substantial contribution to Issue 4. GPI's arguments to suspend or restructure DIDF, rename DIDF or eliminate its "deferral" focus, and to reframe DIDF outside its narrow use case were not adopted in D.24-10-030. D.24-10-030 neither relies on, nor reflects, GPI's proposed changes to DIDF, and broader DIDF reform was deferred to future phases of this proceeding. Additionally, GPI's recommendations here closely mirrored those of TURN and Cal Advocates without adding unique evidence or perspectives that enriched the record. As such, all hours claimed by GPI towards Issue 4 are reduced. In D.03-03-031, the Commission interpreted the duplication language contained in the first dependent clause to require "the compensation opponent to establish three elements – duplication, similar interests, and adequate representation." (D.03-03-031 at 18.) "[I]t is within the Commission's discretion to decide whether those interests are otherwise adequately represented, in determining whether an intervenor has made a substantial contribution." (D.04-07-039 at 8; see also Pub. Util. Code, §§ 1801.3(f), 1802(j), 1802.5). When there is parallel participation between parties, "[p]articipation by a customer that materially supplements, complements, or contributes to the presentation of another party, including the commission staff, may be fully eligible for compensation if the participation makes a substantial contribution." (Pub. Util. Code, § 1802.5; see also D.09-08-021 at 13). Merely supporting the positions of other parties, without offering additional analysis, a distinct perspective, or unique factual or legal contributions, does not constitute a significant contribution. While an intervenor's alignment with a particular position can be helpful in informing the Commission's decision-making process, the hours claimed for such support must be reasonable. Ratepayers should not bear the cost of excessive time spent by an intervenor reiterating arguments that have already been presented by others in the proceeding. As stated above, and given that GPI's contributions toward Issues 1 and 4 did not substantially contribute to this

Item	Reason																																																																																	
	proceeding, the Commission finds it reasonable to reduce all hours dedicated to Issues 1 and 4. <u>Issue 1</u> <table><tr><th>Name</th><th>Year</th><th>Hours Requested</th><th>Hours Awarded</th></tr><tr><td rowspan="3">Morris</td><td>2021</td><td>6.45</td><td>0.00</td></tr><tr><td>2022</td><td>2.15</td><td>0.00</td></tr><tr><td>2024</td><td>0.15</td><td>0.00</td></tr><tr><td rowspan="4">Hunt</td><td>2021</td><td>5.36</td><td>0.00</td></tr><tr><td>2022</td><td>20.46</td><td>0.00</td></tr><tr><td>2023</td><td>15.40</td><td>0.00</td></tr><tr><td>2024</td><td>26.90</td><td>0.00</td></tr><tr><td rowspan="4">Harrold</td><td>2021</td><td>8.65</td><td>0.00</td></tr><tr><td>2022</td><td>3.64</td><td>0.00</td></tr><tr><td>2023</td><td>1.76</td><td>0.00</td></tr><tr><td>2024</td><td>7.50</td><td>0.00</td></tr><tr><td rowspan="3">Chiacos</td><td>2022</td><td>13.75</td><td>0.00</td></tr><tr><td>2023</td><td>10.25</td><td>0.00</td></tr><tr><td>2024</td><td>1.01</td><td>0.00</td></tr><tr><td rowspan="2">White</td><td>2021</td><td>0.15</td><td>0.00</td></tr><tr><td>2023</td><td>1.58</td><td>0.00</td></tr></table> <u>Issue 4</u> <table><tr><th>Name</th><th>Year</th><th>Hours Requested</th><th>Hours Awarded</th></tr><tr><td rowspan="4">Morris</td><td>2021</td><td>0.80</td><td>0.00</td></tr><tr><td>2022</td><td>0.95</td><td>0.00</td></tr><tr><td>2023</td><td>1.20</td><td>0.00</td></tr><tr><td>2024</td><td>1.40</td><td>0.00</td></tr><tr><td rowspan="2">Hunt</td><td>2021</td><td>13.38</td><td>0.00</td></tr><tr><td>2022</td><td>27.85</td><td>0.00</td></tr></table>	Name	Year	Hours Requested	Hours Awarded	Morris	2021	6.45	0.00	2022	2.15	0.00	2024	0.15	0.00	Hunt	2021	5.36	0.00	2022	20.46	0.00	2023	15.40	0.00	2024	26.90	0.00	Harrold	2021	8.65	0.00	2022	3.64	0.00	2023	1.76	0.00	2024	7.50	0.00	Chiacos	2022	13.75	0.00	2023	10.25	0.00	2024	1.01	0.00	White	2021	0.15	0.00	2023	1.58	0.00	Name	Year	Hours Requested	Hours Awarded	Morris	2021	0.80	0.00	2022	0.95	0.00	2023	1.20	0.00	2024	1.40	0.00	Hunt	2021	13.38	0.00	2022	27.85	0.00
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Item	Reason			
		2023	34.10	0.00
		2024	29.53	0.00
	Harrold	2021	2.20	0.00
		2022	31.10	0.00
		2023	3.60	0.00
		2024	15.13	0.00
	Chiacos	2024	1.35	0.00
	White	2021	0.20	0.00
		2023	2.50	0.00
[7] Internal Duplication – Excessive Hours Claimed	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 Morris’, Hunt’s and Harrold’s time records. Specifically, their time records dedicate over 376 hours 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 scope of the issues involved. The records indicate that similar tasks were billed by more than one participant without clear delineation of individual responsibility or added substantive value. Additionally, Morris’, Hunt’s and Harrold’s time records vary, conducting the same tasks for different time allocations. Such repeated internal review and joint editing exceed what is considered reasonable or efficient under the Intervenor Compensation Program’s standards. 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 an excess of 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.” (See D.12-03-024 at 24-25). For the unproductive and excessive 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 total hours, not previously reduced, for GPI’s representatives Morris, Hunt and			

Item	Reason																																											
	Harrold. This reduction is commensurate with the contribution made in these areas especially since GPI failed to demonstrate how this provided any significant additional value. We note that GPI’s \$403,164.00 request is approximately three times larger than the next highest intervenor request in this proceeding. By comparison, other intervenors seeking compensation for contributions to D.24-10-030 requested significantly lower amounts: UCAN requested \$134,182.10, EDF requested \$27,133.75, and TURN requested \$17,813.13. Given the substantial overlap between GPI’s positions and those advanced by other parties, the limited contributions made, as well as the markedly higher amount of GPI’s claim, the reductions applied to GPI’s hours are reasonable. <table><tr><th>Name</th><th>Year</th><th>Hours Requested¹²</th><th>Hours Awarded¹²</th></tr><tr><td rowspan="4">Morris</td><td>2021</td><td>2.75</td><td>1.38</td></tr><tr><td>2022</td><td>12.4</td><td>6.20</td></tr><tr><td>2023</td><td>8.3</td><td>4.15</td></tr><tr><td>2024</td><td>9.45</td><td>4.73</td></tr><tr><td rowspan="4">Hunt</td><td>2021</td><td>44.76</td><td>22.38</td></tr><tr><td>2022</td><td>61.94</td><td>30.97</td></tr><tr><td>2023</td><td>90.26</td><td>45.13</td></tr><tr><td>2024</td><td>97.32</td><td>48.66</td></tr><tr><td rowspan="4">Harrold</td><td>2021</td><td>7.15</td><td>3.58</td></tr><tr><td>2022</td><td>28.76</td><td>14.38</td></tr><tr><td>2023</td><td>39.39</td><td>19.70</td></tr><tr><td>2024</td><td>33.13</td><td>16.57</td></tr></table>	Name	Year	Hours Requested ¹²	Hours Awarded ¹²	Morris	2021	2.75	1.38	2022	12.4	6.20	2023	8.3	4.15	2024	9.45	4.73	Hunt	2021	44.76	22.38	2022	61.94	30.97	2023	90.26	45.13	2024	97.32	48.66	Harrold	2021	7.15	3.58	2022	28.76	14.38	2023	39.39	19.70	2024	33.13	16.57
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[8] Excessive IComp Claim Preparation Hours	GPI’s claims 47.00 hours dedicated to Intervenor Compensation (IComp) Claim Preparation in 2024. We find the hours submitted by GPI to be unreasonable and excessive given the scope of issues and overall scale of the request. Hours claimed must be reasonable, productive, effective, and efficient.																																											

¹² The hours requested here are the remaining total hours GPI claimed towards Issues 2, 3, and 5, and the hours awarded here are the remaining total hours after the disallowances made above in item [6] rounded to the nearest hundredth.

Item	Reason
	GPI did not provide an accurate amount of IComp Prep Hours in their timesheet. Additionally, we note that there were several issues with the claim, including omission of required information, unclear or inconsistent details, and other inconsistencies that hindered the Commission's ability to evaluate and resolve the claim. We therefore reduce Morris' 2024 Intervenor Compensation Claim Preparation Hours by 34.00 hours, approving a total of 13.00 hours of 2024 IComp Claim Preparation.
[9] Disallowance of Excess Compensation Exceeding Actual Consultant Costs	Upon closer review of the Associate Service Agreement Addendum, we find that the compensation GPI is requesting for the consultant's time 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 consultant's 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 a consultant's time exceeds the amount the intervenor will actually pay the consultant under their contract terms, the Commission will reduce the award to match the actual cost incurred. Here, we reduce the award by \$1,971.00 to ensure that the amount awarded in this claim for the consultant's services aligns with the actual compensation terms established in the Associate Service Agreement Addendum. Because the Associate Service Agreement Addendum between Future Resources Associates and White was

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

Item	Reason
	filed under seal, we do not disclose here how the reduction is specifically calculated.
[10] 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.
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 14, 2026. Some of these comments were broad, general, and addressed twelve other proposed decisions, 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 eloquently 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. 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....”

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

¹⁵ *Ibid.*

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 section 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 excessive, had limited substantive contribution to the decision-making process and did not meaningfully contribute to the outcome of the decision. 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

TURN and the Center for Accessible Technology did not file comments on the proposed decision in this proceeding, but the Commission confirms that 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 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

GPI asserts that the standard established in D.07-01-009 regarding compensation to consultants, 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," does not apply here. GPI claims that these practitioners, who performs nearly all of their work for GPI, are not outside

¹⁶ *Id.* at 9.

¹⁷ *Id.* at 2.

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.

consultants but function more like contract employees. According to GPI, classifying them as outside consultants is incorrect and leads to inaccurate conclusions in the proposed decision.¹⁹

The Commission is not convinced by GPI's argument that Hunt, Harrold and the other practitioners are not consultants, but contract employees of GPI. They all work for separate entities, (law and/or consultancy firms), and were retained to provide services for GPI/Future Resources Associates. They have formal service agreements in place 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. These practitioners separately bill Future Resources Associates directly for work in this proceeding, and although GPI chooses not to label them as consultants, 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' 2021, 2022, 2023 and 2024 hourly rates of \$440, \$450, \$460, and \$475 respectively and argues that it should be increased to the requested rates of \$450, \$465, \$485 and \$505.

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. The rate range for an Advocate - Executive Director - Level V is \$169.05-\$442.37 for 2021, \$178.43 - \$451.75 for 2022, \$191.49 - \$464.81 for 2023, and \$203.94 - \$477.26 for 2024. Therefore, we uphold Morris' 2021 - 2024 hourly rates, as they already reflect the upper limits for this level. We note that the previously approved rates that GPI references to were approved for a different role. Given Morris' clarification that he is the 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 Hunt

GPI does not challenge Hunt's awarded rates for 2022 and 2023 but does object to the awarded rates for 2021 and 2024.²⁰ GPI argues that it should be increased to \$585 for 2021 and \$695 for 2024.

We uphold the awarded hourly rates based on the terms outlined in the service agreement filed under seal. This rate is consistent with the Commission's policy on consultant compensation.

5. Hourly Rates for Harrold

GPI does not challenge Harrold's awarded rates for 2021 and 2022 but does object to the awarded rates for 2023 and 2024.²¹ GPI argues that it should be increased to \$325 for 2023 and \$340 for 2024.

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

²⁰ *Id.* at 7.

²¹ *Id.* at 7-8.

We uphold the awarded hourly rates based on the terms outlined in the service agreement filed under seal. This rate is consistent with the Commission's policy on consultant compensation.

6. Hourly Rates for White

GPI objects to White's awarded 2021, 2022, and 2023 rate of \$375 and argues that they should be awarded at \$550, \$570 and \$595 respectively.²²

We uphold the awarded hourly rates based on the terms outlined in the service agreement filed under seal. This rate is consistent with the Commission's policy on consultant compensation.

7. Reduction in Hours

GPI argues that an intervenor need not prevail on every recommendation to make a substantial contribution and may be compensated where its participation assists the Commission, enriches the record, or materially supplements another party's presentation.²³ GPI requests that most or all reductions be rescinded. Regarding reductions made for excessive or duplicative efforts, 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 section 1801.3(f), once a substantial contribution has been made. Additionally, they state that there is no authority that GPI is aware of, that permits the Commission to reduce an award because an intervenor's practitioners "collaborated with one another." Lastly, GPI challenges the reduction of claim-preparation time from 28.00 to 13.00 hours.²⁴

The Commission agrees that an intervenor need not prevail on every recommendation. However, under Pub. Util. Code section 1802(j), substantial contribution is determined in the Commission's judgment based on whether the intervenor substantially assisted in making the decision. That finding does not entitle an intervenor to all claimed fees and costs. The Commission may separately determine whether the hours and costs are reasonable and commensurate with the contribution made. The proposed decision determined that GPI's recommendations on Issue 1 did not provide materially distinct forecasting methodologies, data, or analysis and that its recommendations on Issue 4 closely mirrored those of other parties without adding unique evidence, perspectives or significant value. GPI's general assertion that participation may enrich the record does not demonstrate error in those determinations or provide a basis to grant all hours.

Further, Pub. Util. Code section 1801.3(f) requires the program to be administered in a manner that avoids unnecessary or duplicative participation, particularly where similar interests are already represented or additional participation is not needed for a fair outcome. The Commission evaluated GPI's substantial contribution by determining whether the hours claimed were proportional to the value of the contributions provided. The proposed decision identified more than 376 hours in which Morris, Hunt, and Harrold worked on the same issues, attended the same meetings, or reviewed or revised the same drafts, without a clear delineation of separate responsibilities or how it provided additional substantive value. The Commission may determine

²² *Id.* at 8.

²³ *Id.* at 9.

²⁴ *Id.* at 10-13.

that such overlapping time exceeds what was reasonably necessary even where it is determined that the underlying work may have contributed to the decision.

We note that GPI's request for \$403,164.00 is approximately three times larger than the next-highest intervenor request in this proceeding. By comparison, other intervenors seeking compensation for contributions to D.24-10-030 requested significantly lower amounts: UCAN requested \$134,182.10, EDF requested \$27,133.75, and TURN requested \$17,813.13. Given the overlap between GPI's positions and those of other parties, the limited nature of its contributions, and the overall excessive size of its claim, the reductions to GPI's hours are justified.

With regards to claim-preparation time, GPI's characterization of the work required does not establish that all 28.00 hours claimed were reasonable. The proposed decision considered the scope and supporting documentation for this claim and determined that 13.00 hours constituted reasonable claim-preparation time. Therefore, we find the hours award here are reasonable and commensurate with the contributions made and make no changes to the decision.

8. Reductions for Excess Compensation Exceeding Actual Consultant Costs

GPI further claims that they do not understand the additional reduction of \$1,971, which the decision makes to align the consultants' compensation with the terms set in the Associate Service Agreement Addendums. They state that "all of GPI's practitioners are compensated in exact accordance with their Associate Service Agreement." Lastly, GPI argues that because the Commission did not disclose how the reduction is specifically calculated, they cannot accept a reduction it cannot examine. They further state that the reduction is unjustified, and should be eliminated.²⁵

GPI itself acknowledges that the compensation it seeks for its practitioners is higher than the amounts it pays them. Specifically, GPI admits that a portion of the award attributed to the consultants' work is used to cover carrying costs, the risk that not all claimed hours will be approved, and Morris' salary.²⁶ We reiterate the Commission's policy on consultant compensation, which prohibits intervenors from requesting consultant rates that exceed what they actually pay those consultants.

Also, because GPI filed its payment arrangement with its consultants under seal, the decision does not disclose the calculation. The calculation reflects the rates and hours the Commission is awarding GPI's consultants for work in this proceeding, minus the payments the consultants would receive from Morris, dba Future Resources Associates, for the same work, so that the Commission's award aligns with the consultants' billed amounts. That overpayment for the consultants' work is then deducted from the total award to GPI. GPI can rely on the payment terms in the Associate Service Agreements and its Addendums to arrive at this calculation.

Accordingly, we disagree with GPI's contention that the adjustment stems from a misunderstanding of their business practices. It is based on the contractual terms GPI submitted, including the Associate Service Agreements and Addendums governing the consultants' compensation. Therefore, we make no changes.

²⁵ *Id.* at 13.

²⁶ Green Power Institute Submission in Response to Section 2.3 of the September 16 Ruling and Comments of the Green Power Institute on the Proposed Decision at 13.

FINDINGS OF FACT

1. Green Power Institute has made a substantial contribution in some aspects to D.24-10-030.
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 of reasonable compensation is \$121,478.90.

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 \$121,478.90.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall pay Green Power Institute their respective shares of the award, based on their California-jurisdictional electric revenues for the 2023 calendar year, to reflect the year in which the proceeding was primarily litigated. If such data is unavailable, the most recent electric revenue data shall be used. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in

Federal Reserve Statistical Release H.15, beginning March 5, 2025, the 75th day after the filing of Green Power Institute's request, and continuing until full payment is made.

This decision is effective today.

Dated September 3, 2026, at Sacramento, California.

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

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

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D2609018	Modifies Decision?	No
Contribution Decision(s):	D2410030		
Proceeding(s):	R2106017		
Author:	ALJ Regnier, ALJ Chang		
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/ Disallowance
Green Power Institute	Dec. 20, 2024	\$403,164 ⁵	\$121,478.90	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	450	2021	\$440.00
Gregg	Morris	Expert	465	2022	\$450.00
Gregg	Morris	Expert	485	2023	\$460.00
Gregg	Morris	Expert	505	2024	\$475.00
Tamlyn	Hunt	Attorney	585	2021	\$475.00
Tamlyn	Hunt	Attorney	605	2022	\$605.00
Tamlyn	Hunt	Attorney	630	2023	\$630.00
Tamlyn	Hunt	Attorney	695	2024	\$655.00
Zoë	Harrold	Expert	225	2021	\$225.00
Zoë	Harrold	Expert	250	2022	\$250.00
Zoë	Harrold	Expert	325	2023	\$260.00
Zoë	Harrold	Expert	340	2024	\$325.00
Michael	Chiacos	Expert	290	2022	N/A
Michael	Chiacos	Expert	305	2023	N/A
Michael	Chiacos	Expert	315	2024	\$380.00
Sahm	White	Expert	550	2021	\$375.00

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Sahm	White	Expert	570	2022	\$375.00
Sahm	White	Expert	595	2023	\$375.00

(END OF APPENDIX)