Decision 26-09-031 September 3, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of San Diego Gas & Electric Company (U902E) for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design.	Application 23-01-008

DECISION GRANTING COMPENSATION TO CALIFORNIA FARM BUREAU FEDERATION FOR SUBSTANTIAL CONTRIBUTION TO DECISION (D.) 25-09-006

Intervenor: California Farm Bureau Federation	**For contribution to Decision (D.) 25-09-006**
Claimed: $72,498.17 (95% of $76,313.86)	**Awarded: $48,605.00**
Assigned Commissioner: John Reynolds[1]	**Assigned ALJ: Marcelo Poirier[2]**

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	In this proceeding, San Diego Gas & Electric Company (SDG&E) submitted proposals for revenue allocation, time-of-use (TOU) rate design, and miscellaneous tariff and rate design changes for all customer classes. Following the submission of opening and rebuttal testimony by parties and extensive settlement negotiations, most issues were resolved by settlement agreement with a few left for briefs. This decision adopts the three proposed settlement agreements: a. The Partial Settlement Agreement, which resolves cost allocation, creation of a Medium Commercial Class, base time-of-use rates, and most of the other contested issues in this proceeding; b. The Marginal Cost Settlement Agreement that includes proposals to set marginal costs used in cost allocation and rate design; and

[1] Application 23-01-008 was reassigned from President Alice Reynolds to President John Reynolds on May 27, 2026.

[2] Application 23-01-008 was reassigned from Administrative Law Judge (ALJ) Rajan Mutialu to ALJ Marcelo Poirier on April 9, 2026.

	c. The Medical Baseline Settlement Agreement that provides for a line-item medical baseline discount. California Farm Bureau Federation (Farm Bureau) signed on to both the Partial Settlement Agreement and the Marginal Cost Settlement Agreement which resolved nearly all of our issues. This decision also adopted the system percentage of change methodology to update rates, resolved a Power Charge Indifference Adjustment rate design, and Farm Bureau's final issue of bill presentment issues, which adopts a proposal to combine SDG&E's non-residential commodity and distribution tariffs.

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812[3]:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§1804(a)):		
1. Date of Prehearing Conference:	May 10, 2023	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	June 9, 2023	Verified
4. Was the NOI timely filed?		Yes
Showing of eligible customer status (§1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	A.23-01-008	Verified
6. Date of ALJ ruling:	April 11, 2024	Verified
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
Showing of "significant financial hardship" (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	A.23-01-008	Verified
10. Date of ALJ ruling:	April 11, 2024	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes

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

	Intervenor	**CPUC Verification**
Timely request for compensation (§1804(c)):		
13. Identify Final Decision:	D.25-09-006	Verified
14. Date of issuance of Final Order or Decision:	September 22, 2025	Verified
15. File date of compensation request:	November 20, 2025	Verified
16. Was the request for compensation timely?		Yes

PART II: SUBSTANTIAL CONTRIBUTION

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

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
1. **Overall Outcome** In this GRC Phase 2 proceeding, the Commission's final decision adopted the revenue allocation settlement agreement to which Farm Bureau was a party as well as the marginal cost settlement agreement. The partial settlement agreement covered revenue allocation as well as the issue regarding Monthly Service Fees (MSFs) that were directly tied to agricultural rate design. Farm Bureau was the only party representing agricultural customers in developing these settlement agreements. The Commission's decision also agreed with Farm Bureau and the City of San Diego in adopting the proposal to combine SDG&E's non-residential commodity and distribution tariffs. Farm Bureau's specific contributions to the partial settlement and the elements contained within as well as the additional contributions to tariff presentation and marginal cost are described below.	The Joint Motion for Approval of the 2024 General Rate Case Phase 2 Partial Settlement Agreement filed by San Diego Gas & Electric Company, the Public Advocates Office at the California Public Utilities Commission, Utility Consumers' Action Network, Federal Executive Agencies, California Farm Bureau Federation, Small Business Utility Advocates, Solar Energy Industries Association, California City County Street Light Association, The Utility Reform Network, and City of San Diego is granted. **D.25-09-006, Ordering Paragraph 1, p. 92** The Joint Motion for Approval of the 2024 General Rate Case Phase 2 Marginal Cost Settlement Agreement filed by San Diego Gas & Electric Company, the Public Advocates Office at the California Public Utilities Commission, Utility Consumers' Action Network, Federal Executive Agencies, California Farm Bureau Federation, Small Business Utility Advocates, California City County	Verified

	Street Light Association, The Utility Reform Network, and City of San Diego is granted. **D.25-09-006, Ordering Paragraph 2, p. 93** San Diego Gas & Electric Company must submit a Tier 1 Advice Letter that seeks Commission to combine its Electric Energy Commodity Cost tariffs and Utility Distribution Company tariffs for non-residential customers no later than 180 days after effective date of the final decision **D.25-09-006, Ordering Paragraph 11, p. 95**	
2. **Revenue Allocation** In opening testimony, Farm Bureau generally supported SDG&E's revenue allocation proposal outside of the proposal to update Energy Efficiency (EE) costs. SDG&E had not proposed any other revisions to Public Purpose Program (PPP) cost allocations, with the exception of EE costs. SDG&E had proposed to update the currently in effect allocation factors based upon forecasted 2022 EE expenditures. Farm Bureau expressed a concern in its direct testimony that SDG&E's new proposed EE cost allocation factor for the Agricultural class had inexplicably been significantly increased from its current value of 1.83% to 2.77% (an increase of 51.6%). Additionally, while the Company represented that the only change it was making to the EE cost allocations were to incorporate the updated 2022 dataset of forecasted EE expenditures, Farm Bureau raised the issue that the large increase in the Agricultural classes' allocation factor might also be due to a change in the allocation methodology.	Farm Bureau recommends that SDG&E maintain its current revenue allocation factors for all classes because SDG&E's proposed (1) commodity revenue allocation factor for the agricultural class is 58% above cost of service, and (2) Energy Efficiency revenue allocation would increase the allocation factor for the agricultural class from 1.83% to 2.77% even though only 1.73% percentage of Energy Efficiency funds were spent on the agricultural class from 2019-2021. **D. 25-09-006, p. 47-48** We adopt the Partial Settlement Agreement provisions that resolve issues concerning revenue allocation because they are reasonable in light of the whole record, consistent with the law, and in the public interest. It is reasonable to adopt the Partial Settlement Agreement term for SDG&E to maintain Energy Efficiency revenue allocations at the levels adopted in the 2019 GRC Phase 2 except for the creation of a new Medium Commercial customer class. **D. 25-09-006, p. 48**	Verified

Further, Farm Bureau asked SDG&E to provide the actual dollar amounts spent on EE programs that were directly assigned to the Agricultural class, and directly assigned to each of the SDG&E's other individual customer classes for the years 2019, 2020, 2021, and 2022. SDG&E declined to provide that information did not provide CFBF with the requested information; rather it objected to the request "as seeking information and analysis that is equally available to CFBF." Farm Bureau, thus, was left to obtain and analyze the annual data filings with California Energy Data and Reporting System ("CEDARS") on its own. After reviewing the 2019 data set, Farm Bureau noted that the actual expenditures for the Agricultural class were *significantly lower* than the budgeted amounts. This same trend was also apparent in 2020, 2021, and 2022 as is summarized in Table 2 of Farm Bureau's opening testimony. Furthermore, deriving EE allocation factors for 2019, 2020, and 2021 using the actual EE expenditures instead of the budgeted/forecasted amounts yields consistently lower allocation factors for the Agricultural class, as shown in Table 3 of Farm Bureau's opening testimony. While Farm Bureau supported SDG&E's proposed methodologies for the computation of commodity marginal costs, Farm Bureau did not support the proposed commodity revenue allocation factors would result in the Agricultural class paying commodity costs that are approximately 58% higher than the marginal cost of service for the class. Specifically, the Company's proposed commodity marginal cost allocation for the Agricultural class is 0.92% while SDG&E is proposing to set the classes' commodity revenue allocation factor at	To levelize rate changes, it is reasonable to adopt the Partial Settlement Agreement term for SDG&E to use the SAPC methodology to adjust the distribution and commodity revenue allocations based on SDG&E's newest approved and implemented sales forecast with limited, specified adjustments to move SDG&E's agricultural customer class towards a cost-basis. **D. 25-09-006, p. 49** For Commodity Revenue Allocations, SDG&E will use the Commission-approved SAPC methodology, as determined in this proceeding, to adjust the Commodity Revenue Allocations based on the newest approved and implemented sales forecast. However, the initial implementation only will have a secondary calculation to reallocate up to 0.2% of the Agricultural Customer class allocation factor to the Residential Customer class and the Commercial Customer classes (Small, Medium and Large)… The purpose of this secondary allocation is to move the Agricultural Customer Class more towards cost-basis without significantly impacting the other customer classes. **Partial Settlement Agreement, p. 27-28** Wildfire-related costs are currently recovered through distribution revenues based on the EPMC methodology. In opening testimony, SDG&E proposes to continue using this methodology to collect wildfire-related costs. Farm Bureau agrees. **D.25-09-006, p. 49** It is reasonable to adopt the Partial Settlement Agreement term for	

1.46%. Farm Bureau recommended that commodity cost allocations be limited to no higher than 20% above SDG&E's marginal cost of service for any customer class. In rebuttal testimony, Farm Bureau supported SDG&E's position that wildfire mitigation costs be allocated to its various customer classes using its proposed distribution revenue allocation factors. However, if the Commission find that use of an alternative allocation methodology is more appropriate, CFBF recommends that the Commission adopt the allocation methodology that it has previously found to be reasonable in PG&E's and SCE's most recent general rate cases, which should also be noted were the product of lengthy settlement negotiations and thereby products of tradeoffs and compromise. In making this secondary recommendation, Farm Bureau particulalry noted that the adoption of Cal Advocates'/TURN's equal cents-per-Kwh methodology for the allocation of SDG&E's wildfire mitigation costs would create a material inconsistency in how California's three large Investor-Owned Utilities assign wildfire costs to their respective customer classes. Ex. CFBF-2 at 10.	SDG&E to use the EPTR methodology to allocate wildfire-related revenue requirements annually to all customer classes using distribution rate design and allocations that are based on present total revenue because it would assign wildfire-related costs across more customer classes and moderate impacts associated with the use of the equal cents per kWh methodology. **D.25-09-006, p. 51**	
3. **Monthly Service Fees** SDG&E proposed to increase the currently-in-effect Monthly Service Fees ("MSFs") to agricultural customers by 15% in each year of the four-year (2024 – 2027) General Rate Case cycle. In addition, the annual MSF increases under all of the individual PA rate schedules would be limited to 100% of the Cost-Based MSF, if this threshold is reached during the four-year GRC cycle period. Farm Bureau noted that the annual 15% increases are actually	Farm Bureau cites the rate shock imposed by SDG&E's proposed 75% aggregate increase in the MSF for agricultural customers by Year 4 and suggests a 3.1% increase in the MSF that is based on the Consumer Price Index. **D.25-09-006, p. 34** The Partial Settlement Agreement provides for the following increases in customer MSFs over the next four years: 5% per year for the Small	Verified

compounded across the four-year 2024-2027 period so that in 2027, the last year of the current four-year GRC period, the MSFs for many Agricultural customers would be a whopping 75% higher than the current MSFs. This represents a huge change to the current PA rate design that would all take place within a single four-year GRC cycle. Ex. CFBF-01 at 5-6 Farm Bureau noted in opening testimony that SDG&E's proposal to increase the MSFs by 15% per year would have especially harmful impacts on smaller Agricultural customers that have peak load demands under 20 KW and that take service under rate schedule TOU-PA. In order to mitigate impacts, Farm Bureau proposed the MSFs under all of the TOU-PA and PA-T-1 rate schedules be increased by a definable (and non-arbitrary) metric that represents the expected near-term general rate of inflation. Specifically, CFBF proposes that the MSFs under the PA rate schedules be increased by 3.1%/year across the period 2024 – 2027, to be capped at 100% of the Cost-based MSF.	Commercial Class, 15% per year for the Medium Customer Class, 10% per year for the Large Commercial Customer Class except for increases of 7.5% per year for substation customers in this class, and 5% per year for Agricultural Customer Class. **D.25-09-006, p. 34** It is reasonable to adopt the Partial Settlement Agreement term for SDG&E's MSF to increase by the following percentages per year for four years: (a) 5 percent per year for small commercial customers, (b) 15 percent per year for Medium Commercial customers, (c) 10 percent per year for the large commercial customers, except for increases of 7.5 percent per year for substation customers in this class, and (d) 5 percent per year for agricultural customers to allow the MSF to better reflect cost-of-service and minimize rate shock to customers. **D.25-09-006, p. 34-35**	
4. **Bill Presentment** In opening testimony, Farm Bureau opposed SDG&E's proposal to move away from the 2019 Settlement Agreement regarding bill presentment which Farm Bureau was a proponent of and party to. As part of the SDG&E's 2019 GRC Phase 2 Settlement Agreement, and as approved by the Commission in D.21-07-010, SDG&E agreed to provide illustrative tariff examples for each rate class showing a new simplified tariff structure. As described by Company witness Evelyn Luna, the simplified structure would show both the distribution and	The City of San Diego recommends that the Commission require SDG&E to combine its EECC tariffs (i.e. generation and generation capacity tariffs) and Utility Distribution Company (UDC) tariffs (i.e. transmission and distribution tariffs) for all non-residential customers. For simplicity, The City of San Diego claims that this measure would allow customers to only review a single tariff and avoid confusing Direct Access and CCA customers that need to view separate tariffs to examine various rates and charges.185 Plus, the City of San Diego argues that consolidating the	Verified

commodity portions of rates together in the tariff so that customers could more easily determine their overall power purchase costs. Farm Bureau believes having SDG&E maintain the desired rate component information in two different locations (i.e., the tariff sheets and on the Total Electric Rates website) provides greater transparency and opportunity for customers to understand their rates and limits the potential for confusion or discrepancies.	EECC and UDC tariffs would align tariff policies for PG&E, SCE, and SDG&E. Farm Bureau agrees. As a remedy, Farm Bureau recommends that SDG&E should be directed to consolidate all charges for a single rate option into one tariff. **D.25-09-006, p. 67-68** …it is reasonable to require SDG&E to combine its EECC tariffs and UDC tariffs for non-residential customers. **D.25-09-006, p. 69**	

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

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: • City of San Diego regarding bill presentment and tariff combination. • Cal Advocates and SBUA regarding MSFs for residential and small business customers. • Cal Advocates, SBUA, and FEA in support of the Marginal Cost Settlement		Noted
d. Intervenor's claim of non-duplication: Farm Bureau was the only intervenor Representing agricultural parties in settlement discussions regarding revenue allocation. While the City of San Diego has some accounts on agricultural rate schedules, it did not address SDG&E proposed revenue allocation in its testimony. The City of San Diego was also a signer on the 2019 GRC Phase 2 settlement that addressed bill presentment issues. Both the City of San Diego and Farm Bureau addressed SDG&E's reversal on this issue in opening testimony. City of San Diego further acknowledged Farm Bureau's testimony in its rebuttal, "The City supports the proposals by both CFBF and SDCP/CEA. The City's opening testimony supported tariff simplification by combining UDC and commodity tariffs into a single tariff for each rate option.17 This is consistent		Noted

	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
with CFBF's proposal." Ex CSD-2, p. 6. Knowing this was the remaining issue for Farm Bureau and it would be addressed by the City of San Diego in their opening brief, Farm Bureau chose to simply file a reply brief addressing the importance of the settlement agreements and its support of the City's opening brief. This eliminated time spent on an opening and reply brief addressing the same issue, but enhanced the arguments put forth by both parties and offered the unique experience of agricultural customers. While Cal Advocates and SBUA similarly addressed MSFs on behalf of their customer base, Farm Bureau was the only intervenor to address MSFs on behalf of agricultural customers. Further, Farm Bureau provided a solution to address MSFs by using inflation that was not presented by any other party and was very close to the ultimate settled position. Cal Advocates, SBUA, FEA, and Farm Bureau all signed on in support of the Marginal Cost Settlement along with several other parties. Farm Bureau's primary Marginal Cost issue revolved around the failure to use the 2024 Commodity Cost Study. SBUA had similar concerns and questions about this issue. Ultimately, the parties agreed on a comprehensive settlement agreement surrounding Marginal Cost which Farm Bureau joined. In response to SEIA's opposition to that settlement agreement, Farm Bureau joined Cal Advocates, SBUA, and FEA in responding. This joint response limited duplicative motions largely addressing the same concerns with SEIA's proposals and providing supporting arguments for the settlement agreement.		

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC DISCUSSION
a. Intervenor's claim of cost reasonableness: Farm Bureau's total costs of $76,313.86 are reasonable given Farm Bureau's active participation in this proceeding (*see* Part b) and reasonable rates. Of that amount, Farm Bureau is requesting $72,498.17, which represents 95% of the total cost to reflect the estimated percentage of small agricultural customers represented. As discussed in the attached rate justifications, the rates requested for Lloyd Reed and the hourly attorney rates are toward the lower end of the Commission's approved compensation ranges. As described in Part II, Farm Bureau's participation had a strong impact on the case outcome and no other party represented the agricultural customer	After the adjustments made to this claim, the remainder of the claimed costs are reasonable. *See* Part III.D.

	CPUC DISCUSSION
segment in this proceeding. Farm Bureau's active participation was needed to protect agricultural customers from an unfair allocation of revenue and from the rate shock that may have ensued from SDG&E's proposals, which would have resulted in the greatest increases falling on the smallest agricultural customers. Farm Bureau added substantively to the case record with quantitative analyses that were not duplicated by other parties in particular on Energy Efficiency cost allocation. Farm Bureau was the only party to address this issue. Farm Bureau also provided unique analysis on Commodity Revenue Allocation as its customers remain largely bundled that resulted in a secondary recalculation that is specific only to the Agricultural Customer class lowering the initial Commodity Revenue Allocation. Further, Farm Bureau provided distinctive analysis on Monthly Service Fees that were specific to agricultural customers and provided a more realistic approach to their potential increase. Farm Bureau was an active participant in settlement negotiations as is evident by the successful outcomes for agricultural customers. It provided insight and edits to the documents that represent those agreements and support of those agreements without duplicating or doing superfluous work. Farm Bureau provided briefs and comments on the proposed decision, which were necessary, but again limited and not excessive. This level of participation was needed to have a meaningful impact on the proceeding given the potential outcomes for agricultural customers.	
b. Reasonableness of hours claimed: Farm Bureau's participation in this proceeding was comprehensive and impactful. Lloyd Reed spent 115.57 hours in developing testimony, participating in settlement discussions, and supporting Farm Bureau's case throughout the proceeding. This level of involvement was needed given the number of significant issues impacting agricultural customers in this proceeding. Some of those issues included Energy Efficiency allocation, Commodity Revenue Allocation, and MSFs. Energy Efficiency allocation changes that required CEDAR database analysis that was not provided by SDG&E. In fact, SDG&E objected to the request "as seeking information and analysis that is equally available to CFBF." Mr. Reed diligently reviewed the database information and synthesized allocated revenues versus actual expenditures. This also required coordination with San Diego County Farm Bureau on how members were using these allocations and the necessity/significance of continued funding and at what volume. This endeavor proved fruitful in the final decision to revert to the 2019 allocations as Mr. Reed showed there was already a significant of funding from agricultural customers that remained unused. Mr. Reed also spent a portion of time on Commodity Cost Allocation, which resulted in a unique reduction for agricultural customers that reflected his analysis and prevented a	After the adjustments made to this claim the remainder of the claimed costs are reasonable. *See* Part III.D.

<table>
<tr><th></th><th>CPUC DISCUSSION</th></tr>
<tr><td>significant shift above the cost of service. Mr. Reed spent additional time on the MSFs and the cumulative impacts the increases would have had, particularly on small agricultural customers. His more reasonable approach of using inflation resulted in an agreement reflecting an increase that was similar to his numbers and provided more stability. Mr. Reed, further, followed the same arduous steps Farm Bureau recreated in its reply brief to review SDG&E's tariffs both for case analysis and in support of the combination of said tariffs. Given the complexity of the revenue allocation process and the importance of that process, Farm Bureau also required Mr. Reed's expertise to ensure that agricultural customers were assigned an appropriate allocation of revenue and that the resulting rates were correct and well defined over the GRC period.

In submitting its request for attorney hours, Farm Bureau made conservative requests by not listing, in most instances, the attorney time for calls with Mr. Reed in pursuing the proceeding. In addition, every effort was made to be precise in documenting time spent on tasks. The expert hourly fee is lower than the attorney hourly fee thus reducing the request by preferring the expert billed time. Further, significantly more time was spent by Kevin Johnston rather than Karen Mills given the large discrepancy in attorney rates. Comments and briefs filed at the Commission were nearly exclusively billed and prepared by the attorney so that hours by Mr. Reed would not duplicate preparation.

Farm Bureau's initial estimate in the NOI, while not broken down by subject, proved to be extremely close to the eventual time spent on the case. Mr. Reed spent 115.57 (estimated 100), Mr. Johnston 89.6 (estimated 85), and Ms. Mills 4.9 (estimated 20). Further, Farm Bureau's request of $72,498.17 is less than 73,910, which was 95% of the estimated total in Farm Bureau's NOI.</td><td></td></tr>
<tr><td>c. Allocation of hours by issue:
Lloyd Reed
<table>
<tr><th></th><th>Hours</th><th>Percentage of Total</th></tr>
<tr><td>Total time on RA</td><td>74.89</td><td>65%</td></tr>
<tr><td>Total time on BP</td><td>0.80</td><td>1%</td></tr>
<tr><td>Total time on General</td><td>20.08</td><td>17%</td></tr>
<tr><td>Total time on RD</td><td>19.80</td><td>17%</td></tr>
<tr><td>Total (not including Comp time)</td><td>115.57</td><td>100%</td></tr>
</table>
Kevin Johnston
<table>
<tr><th></th><th>Hours</th><th>Percentage of Total</th></tr>
<tr><td>Total time on RA</td><td>44.30</td><td>49%</td></tr>
<tr><td>Total time on BP</td><td>5.60</td><td>6%</td></tr>
</table></td><td>After the adjustments made to this claim the remainder of the claimed costs are reasonable. See Part III.D.</td></tr>
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	CPUC DISCUSSION

Total time on General	32.20	36%
Total time on RD	7.50	9%
Total (not including Comp time)	89.60	100%

Karen Norene Mills

	Hours	Percentage of Total
Total time on RA	1.0	20%
Total time on BP	0.0	0%
Total time on General	3.2	66%
Total time on RD	0.7	14%
Total (not including Comp time)	4.9	100%

As discussed in Part b., Farm Bureau was very judicious in its usage of time, and both limited the time Mr. Reed spent on general matters and limited the time Ms. Mills spent overall. The time spent on RA and RD are indicators of the two biggest priorities of Farm Bureau as explained in Part II A. Further, given that most issues were settled in the case, Mr. Johnston's higher use of general time as the lead attorney is to be expected.

Glossary for Billing Descriptions

Comp	Work related to Intervenor Compensation claim and NOI
General	Work related to general participation in the proceeding, such as the development and submission of data requests, review of applications, development of Farm Bureau testimony, review and analysis of other parties' testimony, review of rulings and preparation of briefs and comments.
RA	Work related to revenue allocation, including settlement discussions. In particular, Farm Bureau focused on the allocation of EE funding, wildfire cost allocation, and commodity cost allocation along with general issues around Marginal Cost.
RD	Work related to discussions and development of rate design for the agricultural class. In particular, this work was primarily focused on the increases to Monthly Service Fees (MSFs).
BP	Work related to the issue of bill presentation or presentment and Farm Bureau's stance that the 2019 GRC Phase 2 settlement agreement should be followed, and non-residential tariffs be combined.

B. Specific Claim:*

CLAIMED						**CPUC AWARD**		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Kevin Johnston	2023	14.7	$300.00	*See* attached request for establishment of rate	$4,410.00	11.80 [4]	$300.00 [1]	$3,540.00
Kevin Johnston	2024	69.2	$314.00	*See* attached request for establishment of rate	$21,735.72	56.00 [4]	$310.00 [1]	$17,360.00
Kevin Johnston	2025	5.7	$325.00	*See* attached request for establishment of rate	$1,852.32	5.70	$320.00 [1]	$1,824.00
Karen Norene Mills	2023	0.5	$745.00	*See* attached request for establishment of rate	$372.50	0.25 [4]	$550.00 [2]	$137.50
Karen Norene Mills	2024	3.8	$775.00	*See* attached request for establishment of rate	$2,946.22	2.75 [4]	$570.00 [2]	$1,567.50
Karen Norene Mills	2025	0.6	$802.00	*See* attached request for establishment of rate	$481.29	0.30 [4]	$590.00 [2]	$177.00
Lloyd Reed	2023	27.95[4]	$345.00	*See* attached request for establishment of rate	$9,518.55	22.58 [4,5]	$225.00 [3]	$5,080.50
Lloyd Reed	2024	87.98	$359.00	*See* attached request for establishment of rate	$31,588.47	71.96 [4,5]	$225.00 [3]	$16,191.00
					Subtotal: $72,905.07			***Subtotal:* $45,877.50**

[4] Timesheet hours show a total of 27.59 hours.

CLAIMED						CPUC AWARD		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Kevin Johnston	2023	3	$150.00	Half of requested rate for 2023	$450.00	3.0	$150.00 [1]	$450.00
Kevin Johnston	2025	9	$162.48	Half of requested rate for 2025	$1,462.36	9.0	$160.00 [1]	$1,440.00
Karen Norene Mills	2023	0.9	$372.50	Half of requested rate for 2023	$335.25	0.9	$275.00 [2]	$247.50
Karen Norene Mills	2025	2	$401.07	Half of requested rate for 2025	$802.15	2.0	$295.00 [2]	$590.00
Lloyd Reed	2025	2	$179.52	Half of requested rate for 2025	$359.04	0 [3]	N/A	N/A
Subtotal: $3,408.79						***Subtotal: $2,727.50***		
TOTAL REQUEST: $72,498.17 (95% of $76,313.86)						***TOTAL AWARD: $48,605.00***		
*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award. ***Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate.*								

ATTORNEY INFORMATION			
Attorney	**Date Admitted to CA BAR[5]**	**Member Number**	**Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation**
Kevin Johnston	2021	338359	No
Karen Norene Mills	1983	109363	No

[5] This information may be obtained through the State Bar of California's website at http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch.

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

ATTACHMENT OR COMMENT #	DESCRIPTION/COMMENT
1	Certificate of Service
2	Timesheets for Farm Bureau's Attorneys and Expert
3	Hourly Rate Justification for Kevin Johnston
4	Hourly Rate Justification for Karen Norene Mills
5	Hourly Rate Justification for Lloyd Reed

D. CPUC Comments, Disallowances, and Adjustments

ITEM	REASON
[1] Kevin Johnston (Johnston) 2023, 2024 and 2025 Hourly Rates	CFBF requests a 2023 hourly rate of $300.00, a 2024 hourly rate of $314.00 and a 2025 hourly rate of $325.00 for Johnston. Kevin Johnston has been an attorney since 2015 where he practiced law in Oregon and then was admitted to the State Bar of California on 08/18/2021. CFBF confirms that Johnston has been participating in CPUC proceedings on behalf of Farm Bureau as a Director and Counsel since August 2020. For Johnston's 2023 hourly rate, CFBF requests the application of rates for an Attorney – Level II, given his three years of experience as a practicing attorney. The rate range for Attorney – Level II for 2023 is $239.30 to $428.46. Based on Johnston's experience level, we find the requested 2023 rate of $300.00 as a Legal – Attorney – II reasonable and adopt it here. Intervenor Compensation Claim Preparation is compensated at ½ preparer's normal rate, bringing the 2023 claim preparation rate to $150.00 per hour. For Johnston's 2024 hourly rate, the Commission applies the annual escalation methodology adopted in Resolution ALJ-393. Per Resolution ALJ-393, a percent change of 4.07% for 2024 is applied. With a 2023 rate of $300.00, and the escalation factor of 4.07%, we adopt a 2024 rate of $310.00, rounded to the nearest five dollars. For Johnston's 2025 hourly rate, the Commission applies the annual escalation methodology adopted in Resolution ALJ-393. Per Resolution ALJ-393, a percent change of 3.46% for 2025 is applied. With a 2024 rate of $310.00, and the escalation factor of 3.46%, we adopt a 2025 rate of $320.00, rounded to the nearest five dollars. Intervenor Compensation Claim Preparation is compensated at ½ preparer's normal rate, bringing the 2025 claim preparation rate to $160.00.

[6] Attachments not included in the final Decision.

ITEM	REASON
[2] Karen Norene Mills (Mills) 2023, 2024 and 2025 Hourly Rates	CFBF requests a 2023 hourly rate of $745.00, a 2024 hourly rate of $775.00 and a 2025 hourly rate of $802.00 for Mills. Karen Mills was admitted to the State Bar of California on 12/12/1983 and has been an attorney for Farm Bureau since 1988. She has been the Vice President of Legal Advocacy at the California Farm Bureau since 2019 and CFBF requests a role of Legal Director most appropriate based on her years of experience. Since Mills has been a Vice President since 2019, we find the role of Legal – Legal Director – II, with 2-5 years and a rate range of $368.36 to $607.86 appropriate for Mills. Given Mills' 4+ years of experience as Legal Director, we find a 2023 rate of $550.00 appropriate and adopt it here. Intervenor Compensation Claim Preparation is compensated at ½ preparer's normal rate, bringing the 2023 claim preparation rate to $275.00. In 2024, Mills would have had 5+ years of experience as a Legal Director. Therefore, Mills qualified as a Legal – Legal Director –III, with 5-10 years of experience, at the time of filing and adopt the new experience level for 2024. Per the Market Rate Study Hourly Rate Chart, the 2024 rate range for a Legal – Legal Director – III is $461.99 to $738.39, with a median of $594.33. We find a 2024 rate of $570.00 as a Legal – Legal Director – III reasonable and adopt it here. For Mills' 2025 hourly rate, the Commission applies the annual escalation methodology adopted in Resolution ALJ-393. Per Resolution ALJ-393, a percent change of 3.46% for 2025 is applied. With a 2024 rate of $570.00, and the escalation factor of 3.46%, we adopt a 2025 rate of $590.00, rounded to the nearest five dollars. Intervenor Compensation Claim Preparation is compensated at ½ preparer's normal rate, bringing the 2025 claim preparation rate to $295.00.
[3] Lloyd Reed (Reed) 2023 and 2024 Hourly Rates and 2025 Intervenor Compensation Rate	CFBF requests a rate of $345.00 for Reed in 2023 and $359.00 in 2024. Reed's resume and information provided by CFBF in this claim confirm that he is a consultant. Hourly rates claimed for consultants must be the same rates paid to consultants for work performed in the proceeding pursuant to Resolution ALJ-235 at 4. Per the Intervenor Compensation Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Supplemental information was requested from CFBF on January 13, 2026, to confirm Lloyd Reed's 2023, 2024 and 2025 rates. CFBF provided invoices for Reed's consulting services in this proceeding only for 2023 and 2024. The invoices provided show a billed rate of $225.00 per hour in 2023 and 2024. As such, find this rate reasonable based on his experience level and we approve the 2023 and 2024 rate of $225.00 for Reed. <u>Reed's 2025 Intervenor Compensation Rate:</u>

ITEM	REASON
	Supplemental information was requested from CFBF again on February 17, 2026, to confirm Lloyd Reed's 2025 rate. CFBF's response submitted on February 27, 2026, state "Upon further investigation following their request, it came to my attention that there had been an oversight when completing the initial compensation claim. The only time attributed to Mr. Lloyd in 2025 was for his preparation of a formalized timesheet for the claim, which was 2 hours. That work was conducted near the time that the claim was submitted, and it was anticipated an invoice from Mr. Reed to Farm Bureau would be forthcoming, however no invoice was ever submitted." As a result, since Mr. Lloyd never invoiced CFBF, there is no rate awarded for Reed for 2025. Therefore, all 2025 hours associated with Reed is reduced.
[4] General Participation Hours	**General Participation (27.73 hours reduced)** Per the Intervenor Compensation Program Guide at 26, timesheet records should not excessively categorize work under "General" participation. Normally intervenors may use the General Participation category for preliminary preparation and analysis required to gain general knowledge of a proceeding, however, this should not be a significant portion of the representative's time. Most professional work can be, and must be tied to specific, substantive issues in the proceeding. *See* D.10-04-023 at 13-14. In this case, the timesheet records show that CFBF dedicated 55.48 hours, or nearly 26%, of their total time claimed to general participation. To align this with a more reasonable standard based on the record of this proceeding, we apply a 50% reduction to the 55.48 hours of "General Participation" time. The hours reduced are as follows: • Reed 2023: 2.01 hours reduced • Reed 2024: 8.02 hours reduced • Johnston 2023: 2.90 hours reduced • Johnston 2024: 13.20 hours reduced • Mills 2023: 0.25 hours reduced • Mills 2024: 1.05 hours reduced • Mills 2025: 0.30 hours reduced **Total:** 27.73 hours reduced
[5] Reed's 2023 & 2024 Hours	Multiple Timesheet Entries (11.00 hours disallowed) The following time records submitted for Reed in 2023 and 2024 combine several specific tasks in their timesheet entries. Time records must not combine hours for several specific tasks in one timesheet entry. *See* Rule 17.4(b)(2) and IComp Program Guide at 25. We suspect that some of these entries may be tasks within a larger task and could be related. However, CFBF should provide clearer descriptions so that Commission staff are not left to make assumptions.

ITEM	REASON
	Therefore, the following hours are disallowed from Reed's 2023 and 2024 hours for combining several tasks in one timesheet entry, not previously disallowed: • Reed 2023 Hours: 3.00 • Reed 2024 Hours: 8.00
[6] Incomplete Claim Preparation: Appendix	CFBF failed to complete the Appendix of this claim. We understand this is CFBF's first claim since 2019 and therefore, forgo deductions this time; however, we remind CFBF to make sure all portions of the claim are completed to ensure accuracy and to avoid future disallowances for missing completed parts of the claim.
[7] Other Comments	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. We note that in this claim, CFBF requested higher hourly rates from the Commission for work performed by its consultant, Reed, than CFBF was invoiced. The Commission has adjusted these rates to match the actual costs incurred. We remind CFBF to comply with Commission policy in future claims.

PART IV: OPPOSITIONS AND COMMENTS
Within 30 days after service of this Claim, Commission Staff
or any other party may file a response to the Claim (*see* §1804(c))

A. Opposition: Did any party oppose the Claim?	No

B. Comment Period: Was the 30-day comment period waived (*see* Rule 14.6(c)(6))?	No

If not:

Party	Comment	CPUC Discussion
California Farm Bureau Federation	California Farm Bureau Federation supports the Proposed Decision and accepts the reductions to its compensation request as fair and reasonable. It acknowledges that more specific explanations connecting its work to the issues could have prevented some reductions. Ultimately, Farm Bureau does not contest the award and urges the Commission to approve the PD.	The Commission acknowledges Farm Bureau's comments in support of the Proposed Decision. Farm Bureau does not identify any issues warranting modifications, and therefore we make no changes to the Proposed Decision.

FINDINGS OF FACT

1. California Farm Bureau Federation has made a substantial contribution to D.25-09-006.

2. CFBF's claimed hours are reduced for purposes of compensation to reasonably reflect the value of the substantive contribution provided.

3. The requested hourly rates for California Farm Bureau Federation's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services, and/or reflect the actual rates billed to, and paid by the intervenor, for consultant services rendered.

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

5. The total of reasonable compensation is $48,605.00.

CONCLUSION OF LAW

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

ORDER

1. California Farm Bureau Federation is awarded $48,605.00.

2. Within 30 days of the effective date of this decision, San Diego Gas and Electric Company shall pay California Farm Bureau Federation the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial

commercial paper as reported in Federal Reserve Statistical Release H.15, beginning February 3, 2026, the 75th day after the filing of California Farm Bureau Federation's request, and continuing until full payment is made.

3. The comment period for today's decision is not waived.

4. Application 23-01-008 is closed.

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 from this agenda item and was not part of the quorum in its consideration.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D2609031	**Modifies Decision?**	No
Contribution Decision(s):	D2509006		
Proceeding(s):	A2301008		
Author:	ALJ Marcelo Poirier		
Payer(s):	San Diego Gas and Electric Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
California Farm Bureau Federation	November 20, 2025	$72,498.17	$48,605.00	N/A	*See* Part III.D CPUC Comments, Disallowances and Adjustments

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Kevin	Johnston	Legal – Attorney II	$300.00	2023	$300.00
Kevin	Johnston	Legal – Attorney II	$314.00	2024	$310.00
Kevin	Johnston	Legal – Attorney II	$325.00	2025	$320.00
Karen	Norene Mills	Legal – Legal Director – III	$745.00	2023	$550.00
Karen	Norene Mills	Legal – Legal Director – III	$775.00	2024	$570.00
Karen	Norene Mills	Legal – Legal Director – III	$802.00	2025	$590.00
Lloyd	Reed	Consultant	$345.00	2023	$225.00
Lloyd	Reed	Consultant	$359.00	2024	$225.00
Lloyd	Reed	Consultant	$359.00	2025	N/A

(END OF APPENDIX)