

Decision 26-09-035 September 3, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company
for Comprehensive Gas Advanced Metering
Infrastructure Replacement Program (U39M).

Application 24-03-011
(Filed March 14, 2024)

**DECISION GRANTING COMPENSATION TO THE UTILITY REFORM NETWORK
FOR SUBSTANTIAL CONTRIBUTION TO DECISION 25-12-029**

Intervenor: The Utility Reform Network (TURN)	For contribution to D.25-12-029
Claimed: \$188,418.13	Awarded: \$188,052.50
Assigned Commissioner: Matthew Baker	Assigned ALJ: Jeffrey Lee

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	In D.25-12-029, the Commission approved and adopted the proposed Settlement Agreement among PG&E, TURN, Cal Advocates, and SBUA regarding PG&E's Comprehensive Gas Advanced Metering Infrastructure Replacement Program to replace and upgrade battery-operated Gas Modules installed on customer gas meters that transmit customer gas usage.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812¹:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	6/28/2024	7/2/2024
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	7/29/2024	Verified
4. Was the NOI timely filed?		Yes

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

	Intervenor	CPUC Verification
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.23-06-008	Verified
6. Date of ALJ ruling:	3/20/2024	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.23-06-008	Verified
10. Date of ALJ ruling:	3/20/2024	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.25-12-029	Verified
14. Date of issuance of Final Order or Decision:	12/22/2025	Verified
15. File date of compensation request:	02/20/2026	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
<u>1. Adoption of Settlement Agreement Among PG&E, TURN, Cal Advocates, and SBUA</u>		

For its Gas AMI Replacement Program for 2023-2026, PG&E requested a total of \$11.173 million in O&M expenses and \$485.058 million in capital expenditures. TURN identified and analyzed several deficiencies in PG&E's application, including the following: a lack of root cause analysis for the mass failures of the AMI 1.0 modules, inaccuracy of the failure probability models, lack of cost sharing proposals, unnecessary replacement costs, and others. TURN provided several recommendations, including authorizing zero return for stranded assets, sharing of costs between ratepayers and shareholders, approval for only the like-for-like replacements, reducing cost forecasts based on warranty coverages, and adjusted unit costs. The parties reached a settlement agreement, which was adopted by D.25-12-029. The settlement agreement stated that all scope of work forecasted by this application must be completed within \$4 million of O&M expense and \$420 million of capital expenditure. This represents a reduction of \$7.2 million O&M expense and \$65 million reduction in capital expenditures compared to PG&E's proposal. Revenue requirement for 2023-2026 will drop from \$105.6 million to \$88.6 million, a reduction of \$17 million just for 2023-2026 alone. The Commission adopted the settlement agreement in D.25-12-029 and found that the settlement agreement to be reasonable, consistent with law, and in the public interest.	• TURN Testimony (December 9, 2024), pp. 1-20. • TURN Testimony (December 9, 2024), pp. 1-20. • D.25-12-029, pp. 2-3; D.25-12-029 Appendix A Settlement Agreement. • D.25-12-029, pp. 36-41.	Verified Verified Verified Verified
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<u>2. Effective Date of PG&E's Gas AMI Memorandum Account</u> PG&E requested to recover AMI replacement costs incurred beginning January 1, 2023, more than 14 months before it filed the application. TURN argued that recovery for expenditures prior to the application filing date (March 14, 2024) would constitute prohibited retroactive ratemaking. As a result, PG&E agreed to modify its request to track expenses starting with the application date, and that it cannot recover costs incurred between January 1, 2023 and March 14, 2024. The Commission agreed and granted the motion.	• D.25-12-029, p. 24. • D.25-12-029, p. 24.	Verified Verified
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: SBUA		Verified
d. Intervenor's claim of non-duplication: TURN coordinated with Cal Advocates and SBUA throughout the proceeding to avoid duplicative efforts. TURN presented unique analysis and recommendations addressing a lack of root cause analysis for the mass failures of the AMI 1.0 modules, inaccuracy of the failure probability models, lack of cost sharing proposals, unnecessary replacement costs, and others. Furthermore, TURN coordinated closely with Cal Advocates and SBUA to determine terms for a settlement agreement that would be agreeable to all parties and in the public interest.		Noted

The Commission should find that TURN’s participation was efficiently coordinated with the participation of Cal Advocates so as to avoid undue duplication and to ensure that to the extent duplication occurred, it served to supplement, complement, or contribute to the showing of the other intervenor. And consistent with such a finding, the Commission should determine that all of TURN’s work is compensable consistent with the conditions set forth in Section 1802.5.	
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PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
a. Intervenor’s claim of cost reasonableness: TURN’s request for intervenor compensation seeks an award of approximately \$188,000 as the reasonable cost of our participation in this proceeding. TURN submits that these costs are reasonable in light of the importance of the issues TURN addressed and the savings for ratepayers as a result of the settlement agreement.. The settlement agreement adopted by D.25-12-029 adopted 2023-2026 expense forecast from approximately \$11.2 million to \$4 million, a reduction of approximately \$7.2 million. It also reduced the adopted 2023-2026 capital expenditure forecast from \$485 million to \$420 million, a reduction of approximately \$65 million. As a result, the revenue requirement for 2023-2026 alone is approximately \$54.7 million lower than PG&E’s initial request. (D.25-12-029, p. 32) This represents significant savings for ratepayers during a period of heightened affordability crisis. TURN’s cost of involvement, totaling approximately \$188,000, would represent a very small fraction of the savings achieved for ratepayers. For these reasons, the Commission should find that TURN's efforts have been productive and the requested amount of compensation is reasonable in light of the benefits achieved through those efforts.	Noted
b. Reasonableness of hours claimed: This Request for Compensation includes around 393 hours of TURN’s attorney and expert time, the equivalent of about 10 weeks of full-time work for an individual attorney. TURN’s efforts reflected herein resulted in significant contributions to D.25-12-029, detailed above, and encompass	

the preparation of several filings, testimony, and settlement efforts by TURN. TURN initially assigned this proceeding to General Counsel Bob Finkelstein. Due to an extended leave, the case was later reassigned to Staff Attorney David Cheng. This request for compensation includes approximately 89 hours of Mr. Finkelstein's time, 35 hours of Mr. Cheng's time, and 265 hours of other TURN experts' time. TURN suggests that the Commission should find that the number of issues addressed by TURN in this proceeding, the time necessary for preparing various pleadings and testimonies, and the time required by settlement negotiations warrant finding that the hours spent were reasonable. However, should the Commission believe that more information is needed or that a different approach to discussing the reasonableness of the requested hours is warranted here, TURN requests the opportunity to supplement this section of the request.			Noted
c. Allocation of hours by issue: TURN has allocated all of our attorney and expert time by issue area or activity, as is evident on our attached timesheets (Attachment 2) and in Attachment 3, which shows the allocation of TURN's time included in this request by attorney or expert and issue / activity area. The following codes relate to specific substantive issue and activity areas addressed by TURN.			Noted
Code	Description	Allocation of Time	
AL	Time spent reviewing and potentially responding to advice letter filings	0.1%	
AMI	Work related to AMI issues including meter versions, warranty replacements, and others.	33.5%	
Coord	Time spent coordinating with other parties re issues, procedural items, strategy & others	2.7%	
Costs	Work related to cost issues for the AMI system, including stranded costs, unit costs, and others.	7.0%	
Disc	Time spent on drafting discovery questions, reviewing and analyzing the responses, plus follow-up efforts when necessary	22.5%	
Equity	Work related to equity issues	1.5%	

Ex Parte	Time spent reviewing ex parte notices or conducting ex parte activities	0.1%	
Failure	Work related to AMI meter failure rates, probability models, and others	18.8%	
GH	Work related preparing for or participating in PHC and other hearings	0.5%	
GP	Work related to general participation in this proceeding (document review, case review, and others)	2.9%	
Memo	Work related to the memorandum account, including the appropriate effective date	3.2%	
PD	Work related to the Proposed Decision where not easily allocated to specific issue areas	0.1%	
Settle	Time spent on negotiating, analyzing, and drafting the settlement agreement	7.0%	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Adria Tinnin, TURN Race Impact Policy Analyst	2024	3.75	\$255.00	Res. ALJ-393, 2023 Requested Rate plus 4.1% COLA and 5% increase for tier move (requested in A.23-05-010)	\$956.25	3.75	\$255.00 [1]	\$956.25
David Cheng,	2024	21.75	\$525.00	D.24-07-030	\$11,418.75	21.25 [5]	\$525.00 [2]	\$11,156.25

CLAIMED						CPUC AWARD		
TURN Attorney								
David Cheng, TURN Attorney	2025	13.50	\$570.00	D.25-06-064	\$7,695.00	13.50	\$570.00 [2]	\$7,695.00
Jalal Awan, TURN Energy Policy Analyst	2024	199.74 ²	\$325.00	Res. ALJ-393, New Rate (requested in R.20-07-013)	\$64,918.75	199.75	\$325.00 [3]	\$64,918.75
Jalal Awan, TURN Energy Policy Analyst	2025	63.00	\$355	Res. ALJ-393, 2024 requested rate plus 3.46% COLA plus 5% step increase (requested in A.22-08-003)	\$22,365.00	63.00	\$355.00 [3]	\$22,365.00
Reina Yanagiba, TURN Legal Assistant	2024	2.00	\$100.00	D.24-06-021	\$200.00	2.00	\$100.00	\$200.00
Robert Finkelstein, TURN General Counsel	2024	88.75	\$875.00	D.24-07-033	\$77,656.25	88.75	\$875.00	\$77,656.25
Robert Finkelstein, TURN General Counsel	2025	0.50	\$905.00	2024 rate plus 3.46% COLA	\$452.50	0.50	\$905.00 [4]	\$452.50
Subtotal: \$185,662.50						Subtotal: \$185,400.00		

² Per time records submitted by TURN the correct 2024 total for Jalal Awan is 199.75.

CLAIMED						CPUC AWARD		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Robert Finkelstein, TURN General Counsel	2024	0.50	\$437.50	50% of Authorized 2024 Hourly Rate	\$218.75	0.50	\$437.50	\$218.75
David Cheng, TURN Attorney	2026	8.25	\$307.50	50% of 2026 Rate; See Comment 1	\$2,536.88	8.25	\$295.00 [2]	\$2,433.75
Subtotal: \$2,755.63						Subtotal: \$2,652.50		
TOTAL REQUEST: \$188,418.13						TOTAL AWARD: \$188,052.50		
*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. Intervenors’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award. **Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer’s normal hourly rate								
ATTORNEY INFORMATION								
Attorney		Date Admitted to CA BAR ³		Member Number		Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation		
David Cheng		December 1986		124776		No		
Robert Finkelstein		June 1990		146391		No		

C. Attachments Documenting Specific Claim and Comments on Part III⁴:

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service

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

⁴ Attachments not included in final Decision

Attachment or Comment #	Description/Comment
Attachment 2	Timesheets for TURN Attorneys/Experts
Attachment 3	TURN hours allocated by issue
Comment #1	2026 Rate for David Cheng TURN requests an hourly rate of \$615 for TURN Attorney David Cheng in 2026. The requested rate is equal to the rate authorized by the Commission in D.25-06-064 for Mr. Cheng’s work in 2025, \$570, adjusted by both (1) an escalation rate of 3.3% for 2026, and (2) the second 5% step increase in the Attorney – Level IV experience tier. Calculation: $\\$570 \times [1.033 \text{ (COLA)} + 0.05 \text{ (step increase)}] = \\617.31, rounded to \$615 Res. ALJ-393 permits intervenor representatives to claim up to two 5% annual “step increases” within each labor role experience tier, as long as their final requested rate does not exceed the maximum approved rate for that experience level. (Res. ALJ-393, p. 5). Applying COLA and the second step increase results in an hourly rate of \$615 for Mr. Cheng in 2026.

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Adria Tinnin (Tinnin) 2024 Hourly Rate	TURN requested a 2024 hourly rate of \$255.00 for Tinnin. This included a move to Level II of the Expert – Public Policy Advocate classification and Tinnin’s first 5% step increase for this new level. Based on Tinnin’s experience we find TURN’s request reasonable to move Tinnin to Expert – Public Policy Analyst – Level II. D.25-01-024 adopted a 2023 rate of \$235.00 for Tinnin as an Expert – Public Policy Analyst – Level I. We apply the 2024 escalation factor of 4.07% from Resolution ALJ-393 and Tinnin’s first 5% step increase in Level II to adopt a 2024 hourly rate of \$255.00.
[2] David Cheng (Cheng) 2024-2026 Hourly Rates	TURN requests an hourly rate of \$615 for Cheng in the role of Attorney – IV. We note TURN’s requested hourly rate is based on the 2026 escalation rate and a requested second step-increase as an Attorney – IV. Cheng has already received the two allowable step increases in the role of Attorney – IV, with D.24-06-021 awarding the first step increase in recognition of the role change to Attorney - IV and D.25-06-064 awarding the

Item	Reason
	second step increase. D.25-06-064 previously approved the rate of \$570.00 for Cheng in 2025. For Cheng's 2026 hourly rate, the Commission applies the annual escalation methodology adopted in Resolution ALJ-393, which is a percent change of 3.35%. With a 2025 rate of \$570.00 previously established for Cheng, and based on the escalation factor of 3.35%, a 2026 rate of \$590.00 is calculated, rounded to the nearest five dollars. As Intervenor Compensation Claim Preparation hours are compensated at $\frac{1}{2}$ preparer's normal hourly rate, we apply the rate of \$295.00 for Cheng in 2026.
[3] Jalal Awan (Awan) 2024 and 2025 Hourly Rates	D.26-06-028 verified 2024 and 2025 hourly rates of \$325.00 and \$355.00 for Jalal Awan as an Expert – Public Policy Analyst – III. We note the 2025 rate included application of the first available step-increase for Awan. We apply the same rates here.
[4] Robert Finkelstein 2025 Hourly Rate	D.26-04-019 verified a 2025 hourly rate of \$905.00 for Robert Finkelstein. We apply the same rate here.
[5] Reduction of David Cheng's 2024 Hours for Vagueness	Review of the submitted timesheets found 0.50 hours total for the following entries: 4/13/2024 - Review and respond to internal memo re strategy 4/14/2024 - Review and respond to internal memo re strategy We note these two entries occur after the strategy memo was sent on 4/10/2024 and it is unclear from the description how these tasks contributed to the AMI issue. Therefore, we reduce the 0.50 hours from the 2024 total of 21.75 for vagueness, bringing the awarded total to 21.25.

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))?	Yes

FINDINGS OF FACT

1. The Utility Reform Network has made a substantial contribution to D.25-12-029.
2. The requested hourly rates for The Utility Reform Network's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$188,052.50.

CONCLUSION OF LAW

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

ORDER

1. The Utility Reform Network is awarded \$188,052.50.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company shall pay The Utility Reform Network the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning May 6, 2026, the 75th day after the filing of The Utility Reform Network's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.

This decision is effective today.

Dated September 3, 2026, at San Francisco, California.

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

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:	D2609035	Modifies Decision?	No
Contribution Decision(s):	D2512029		
Proceeding(s):	A2403011		
Author:	ALJ Lee		
Payer(s):	Pacific Gas and Electric Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	February 20, 2026	\$188,418.13	\$188,052.50	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
Adria	Tinnin	Expert	\$255	2024	\$255.00
David	Cheng	Attorney	\$525	2024	\$525.00
David	Cheng	Attorney	\$570	2025	\$570.00
David	Cheng	Attorney	\$615	2026	\$590.00
Jalal	Awan	Expert	\$325	2024	\$325.00
Jalal	Awan	Expert	\$355	2025	\$355.00
Reina	Yanagiba	Legal Assistant	\$100	2024	\$100.00
Robert	Finkelstein	Attorney	\$875	2024	\$875.00
Robert	Finkelstein	Attorney	\$905	2025	\$905.00

(END OF APPENDIX)