Decision 26-09-037 September 3, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Establish a Framework and Processes for Assessing the Affordability of Utility Service.	Rulemaking 18-07-006 (Filed July 12, 2018)

DECISION GRANTING COMPENSATION TO CENTER FOR ACCESSIBLE TECHNOLOGY FOR SUBSTANTIAL CONTRIBUTION TO DECISION 25-12-044

Intervenor: Center for Accessible Technology (CforAT)	**For contribution to Decision (D.) 25-12-044**
Claimed: $78,285.75	**Awarded:** $69,181.50
Assigned Commissioner: Darcie L. Houck	**Assigned ALJ:** Camille Watts-Zagha

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.25-12-044 (the Final Decision) made several adjustments to the Commission's affordability framework to improve consideration of affordability for essential utility services. First, the Final Decision modified the requirement for the investor-owned energy utilities and Class A water utilities to provide updated affordability metrics in all applications where the revenue increase is estimated to exceed more than one percent of the currently authorized revenues, by narrowing this requirement to only General Rate Case applications. Second, the Final Decision transitioned the updates made to the affordability framework via the issuance of the annual Affordability Report to information postings on the Commission's website, under the affordability page, that includes periodic staff updates to the affordability metrics, tools, and analyses on affordability issues, such as the Affordability Report provided in response to Executive Order N-5-24. Third, the Final Decision affirmed the requirement for the investor-owned energy utilities and Class A water utilities to continue to publicly release the Cost and Rate Trackers and eliminates the option to alternatively submit summaries. It also granted SDG&E and SCE

	motions for confidential treatment of certain data. Fourth, the Final Decision requires the Communications Division to prepare a staff report on affordability considerations unique to the communications industry, including the essential service level for broadband. Lastly, the Final Decision summarized the prior public hearings and party comments as well as progress to-date in in implementation of affordability proposals, recommended next steps for consideration by the Commission to further address affordability issues facing California ratepayers, and closed the proceeding.

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

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	10/15/2018	Verified
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	11/9/2018	Verified
4. Was the NOI timely filed?		Yes
Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	See comment below	R.18-03-011
6. Date of ALJ ruling:	See comment below	1/10/2019
7. Based on another CPUC determination (specify):	D.20-06-046, see comment below.	A finding of customer status was established in R.18-03-011 on 1/10/2019. The current proceeding R.18-07-006, commenced within one year of that date, creates a rebuttable presumption of eligibility here.
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes

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

	Intervenor	CPUC Verification
Showing of "significant financial hardship" (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	See comment below	R.18-03-011
10. Date of ALJ ruling:	See comment below	1/10/2019
11. Based on another CPUC determination (specify):	D.20-06-046, see comment below.	A finding of significant financial hardship was established in R.18-03-011 on 1/10/2019. The current proceeding R.18-07-006, commenced within one year of that date, creates a rebuttable presumption of eligibility here.
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.25-12-044	Verified
14. Date of issuance of Final Order or Decision:	12/22/2025	Verified
15. File date of compensation request:	2/20/2026	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
5-11	D.21-09-034 awarded compensation to CforAT for work contributing to D.20-07-032, the Phase 1 Decision in this docket. D.21-09-034 included verification of CforAT's eligible customer status and showing of significant financial hardship. *Id*. at p. 2. D.24-04-034 awarded compensation to CforAT for work contributing to D.22-08-023, the Phase 2 Decision in this docket. D.24-04-034 included verification of CforAT's eligible customer status and	Verified. R.18-03-011 on 1/10/2019 provides rebuttable presumption of customer status and significant financial hardship.

#	Intervenor's Comment(s)	CPUC Discussion
	showing of significant financial hardship. *Id*. at p. 2. "A party found eligible for an award of compensation in one phase of a proceeding remains eligible in later phases, including any rehearing, in the same proceeding." Rule 17.2, Commission Rules of Practice and Procedure.	

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
Overview: Phase 3 of this proceeding focused on a multi-year assessment of the affordability framework adopted in earlier phases and the use of the adopted affordability metrics for consideration in various proceedings. CforAT has long been active on the issue of affordability of essential supplies of utility service, and this has continued through Phase 3 of this proceeding. Specifically, CforAT participated actively in activities related to the Essential Usage Study (which informed the Commission's affordability deliberations) and in Commission En Banc meetings concerning affordability and also submitted the following written comments (naming		We note that this is a general overview and summary of D.25-12-044 for which CforAT is requesting compensation.

conventions based on Final Decision): • Comments on 2022 ACR Inviting Comments on Strategies (Comments on 2022 ACR Strategies), filed August 1, 2022; • Comments on 2022 ACR Seeking Annual Feedback (Comments on 2022 ACR), filed November 30, 2022; • Reply Comments on 2023 ACR Seeking Annual Feedback on the Implementation of the Affordability Framework (Reply Comments on 2023 ACR), filed February 16, 2024;[2] and • Comments on Proposed Decision (Comments on PD), filed December 3, 2025.		
Essential Usage Study: CforAT engaged in work regarding the Essential Usage Study, including participating in workshops and meetings and reviewing drafts and updates. Some of the hours we are claiming are for our work on the Essential Use Study in the A.19-11-009 proceeding which is now closed. CforAT has not	This proceeding included discussion of the Essential Use Study created in the 2019 Phase Two PG&E GRC Proceeding (A.19-11-009). *See* D.22-08-023 at pp. 11-12 (noting that the Phase 2 scoped issue regarding the Essential Usage Study is still in process).	Verified

[2] The Final Decision cites CforAT's opening comments on page 9, but CforAT did not file opening comments. CforAT filed reply comments on February 16, 2024, which not cited in the Final Decision on page 10 in the list of parties that filed replies.

previously requested time for those hours. In D.23-09-017 (the compensation decision based on CforAT's contributions to D.21-11-016 in A.19-11-019), CforAT noted additional time on the Essential Usage Study not included in our request and reserved the right to seek compensation at an appropriate time. D.23-09-017, issued September 25, 2023, in A.19-11-019, at p. 7.		
En Bancs: CforAT attended and participated in Affordability En Banc meetings held by the Commission on February 28-March 1, 2022 and February 7, 2023. Stakeholder input at these En Banc meetings contributed to the Commission's record on affordability, informing the Commission's deliberations.	The Final Decision acknowledges the input gained through parties' participation in the Affordability en bancs that the Commission has considered in this and other proceedings and which will continue to inform the Commission's consideration of affordability. Final Decision at pp. 72-73 and fn.126.	Verified
Comments on 2022 ACR Inviting Comments on Strategies (Comments on 2022 ACR Strategies) When an initial Assigned Commissioner's Ruling requested party comment on issues identified as under review in Phase 3 of this proceeding, CforAT appropriately responded, providing input on the questions issued. *See* Comments on 2022 ACR Strategies at pp. 1-8, cited in Final Decision at p. 6.	The Final Decision includes the Comments on 2022 ACR Strategies, in the list of filings that "constitute the record that is the basis for this decision," and does include this set of Comments within the scope of work for Phase 3 and directly cites this set of comments by CforAT and other parties in its discussion and decision-making. Final Decision at pp. 6, 11, 26, 71. CforAT's Comments on 2022 ACR Strategies appropriately responded to the Commission's solicitation of comments within this Phase and	Verified

As directed by the ACR, CforAT provided recommendations regarding ways for the Commission to maximize public outreach and engagement and vet affordability issues impacting California ratepayers. Comments on 2022 ACR Strategies at pp. 2-8. These comments also recommended that “[t]he Commission should make wide use of its adopted affordability metrics” to obtain insight into challenges faced by households related to essential utility service. Comments on 2022 ACR Strategies at pp. 7-8. CforAT noted that true affordability action must focus on lowering revenue requirements, rather than rate design and allocation issues which can only shift revenue collected among various customer classes. Comments on 2022 ACR Strategies at p. 8, cited in Final Decision at p. 26 footnote 38.	provided input to inform the Commission’s deliberation on affordability issues. While the Final Decision narrows the criteria for including affordability metrics in individual proceedings, the Final Decision affirms that affordability is an important issue to be considered across proceedings and industries and that analysis of affordability “will benefit from the utilization of the metrics developed in this proceeding,” consistent with CforAT’s recommendation advocating for the Commission to make wide use of its affordability metrics. Final Decision at p. 74. In addition, the Final Decision concludes that it is reasonable for Commission staff to continue producing affordability metrics, interactive maps displaying affordability metrics by industry, and forecasts of revenue and rate changes and post them on the Commission website where they are available to the public. Final Decision at p. 81. Consistent with CforAT’s comments regarding addressing affordability through cost reduction strategies, the Final Decision requires greater context and consideration of revenue requirements and capital costs by requiring utilities to include comparisons of revenue and rate trends to inflation and to separate operational and capital expense components. Final Decision at pp. 27-32. These requirements provide more transparency and visibility into the affordability impacts of the utilities’ revenue requirements, consistent with	

	CforAT comments regarding the need to address revenue requirements.	
CforAT recommended that the Commission make wide use of its adopted affordability metrics and noted that they provide a valuable method for understanding households' struggles to obtain essential services. Comments on 2022 ACR Strategies pp. 7-8.	While the Final Decision narrows the number of proceedings in which metrics are required, it nevertheless confirms the usefulness of the metrics and requires energy and Class A water utilities to highlight metrics for vulnerable customer groups, consistent with CforAT's support for use of the metrics and consideration of households' ability to obtain essential utility service. Final Decision at pp. 38-42. It also noted that parties can request consideration of the affordability metrics in additional proceedings and encouraged parties to do so. Final Decision at pp. 77-78.	
CforAT made recommendations regarding steps the Commission should take to vet affordability issues, including focusing on activities within its jurisdiction for action, considering factors that exacerbate energy affordability issues, making wide use of its metrics, making efforts to lower revenue requirements, being mindful of unintended impacts, and considering the development of affordability principles. CforAT noted that the Commission's efforts should "certainly includ[e] options for making recommendations to the state legislature and other policymakers, and support for	Consistent with CforAT's recommendation that the Commission consider activities including coordination with other policymakers, cost reduction, and holistic consideration of budgetary pressures on households, the Final Decision states that "It is critical that the Commission continue to consider a full range of options as to how to reduce electricity bills for customers through review of utility provider applications, rulemaking proceedings and through coordination and education of ratemaking mechanisms and principles with the legislature." Final Decision at p. 71. Consistent with CforAT's recommendation to consider affordability metrics widely, the Commission articulates that the metrics and information from this proceeding will inform its consideration of affordability in other proceedings. Final Decision at pp. 72-73.	

efforts to obtain external (non-ratepayer) funding for areas of broad public concern." Comments on 2022 ACR Strategies at pp. 7-8, cited in Final Decision p.71 footnote 123.		
Comments on 2022 ACR Seeking Annual Feedback (Comments on 2022 ACR) CforAT noted that some feedback could not be fully developed based on the limited experience of stakeholders in working with the affordability metrics and framework. Comments on 2022 ACR at pp. 1-5. CforAT recommended that the itemized lists of revenue requests include easy-to-understand, narrative summaries and recommended specific information that should be included. Comments on 2022 ACR at pp. 11-12. CforAT noted confusion from the time lag and "largely . . retrospective review" provided by the Affordability Report and recommended that future reports clearly indicate the time periods covered and the basis for information provided. Comments on 2022 ACR at p. 10. These overall comments were referenced in the Final Decision at p. 8 ("Many parties indicated that the framework had not been implemented for long, limiting the value of the initial round of feedback. However, some parties did	Consistent with CforAT's recommendations for summaries and a better understanding of the time periods addressed in the Affordability Report, the Final Decision states that "[i]n response [to party feedback], Commission staff implemented several improvements, including adding summary overviews to Quarterly Revenue Reports, and improving the timeliness of the affordability metrics by producing two years' worth of affordability reports in one report." Final Decision at p. 8. Consistent with CforAT's comments regarding the confusion over time periods covered in the Affordability Report, the Final Decision determines that the information can be better presented online, allowing for better clarity and for making updates and adjustments on an ongoing basis. Final Decision at pp. 44-45.	Verified

recommend methodological improvements to the affordability tools”).		
CforAT stated that AACs are a highly useful metric for focusing on areas of the state with the most serious affordability challenges and that it would be helpful to have this geographic targeting available as a tool. Comments on 2022 ACR at p. 4.	Consistent with CforAT’s support for AACs, the Final Decision determines that “AACs should remain part of the analytic toolbox available to stakeholders.” Final Decision at p. 82.	
CforAT stated that the Commission had not yet collected enough information to determine the affordability framework’s impact on closing the digital divide and supported the effective consideration of affordability in communications proceedings. Comments on 2022 ACR at pp. 7-8.	Consistent with CforAT’s support for the consideration of affordability for communications services, the Final Decision directs Communications Division staff to gather and analyze information on affordability considerations for communications and to prepare a staff report on communications affordability, including the essential service level for broadband. Final Decision at pp. 66-67.	
CforAT identified providers’ repetitive arguments and unproductive opposition to consideration of affordability, and CforAT emphasized and supported the Commission’s authority to consider the affordability of communications services. Comments on 2022 ACR at pp. 7-8.	Consistent with CforAT's refutation of providers’ arguments, the Final Decision rejects providers arguments regarding competition and jurisdiction and articulates the Commission’s authority to track affordability and require pricing obligations as a condition for accepting state funds. Final Decision at pp. 65-67.	
CforAT raised concerns about the affordability of communications services, particularly for utility customers with disabilities, and supported the use of affordability metrics in	Consistent with CforAT’s arguments concerning the need for affordable and reliable communications services, the initial version of the proposed decision modified the essential service level for broadband by raising it to 100 Megabits per second (Mbps) download speed, and 20 Mbps upload speed. Proposed	

communications proceedings. CforAT emphasized the importance of affordable and reliable communications services, particularly for our constituency and noting that dependence has increased since the pandemic. Comments on 2022 ACR at pp. 8-9.	Decision, issued November 13, 2025, at p. 60. Consistent with CforAT's arguments regarding customers' increased dependence on communications services since the pandemic, the initial proposed decision determined that consumer broadband needs have evolved beyond the 25/3 Mbps standard. Proposed Decision at p. 60. The Commission has long held that contribution to a Proposed Decision is evidence of a substantial contribution to the proceeding overall, even if the Commission does not adopt the PD's recommendations. Examples of prior proceedings where the Commission has determined that a party's contribution to a proposed decision that was not eventually adopted was still sufficient to support an award of compensation include D.11-05-044, where the Commission awarded TURN substantially all of its requested compensation in a proceeding where it adopted an Alternate PD, which did not adopt TURN's recommendations, over a PD which would have done so. In awarding compensation, the Commission specifically noted that "TURN's participation ensured a thorough analysis on [the relevant issues], and their position was reflected in the PD, though not in the alternate PD, which was the final decision that was adopted. D.11-05-044 at p. 4. The Commission reached a similar outcome in D.13-09-041, awarding compensation to TURN based on its contributions to a proposed decision, even though it approved an alternate proposed decision which did not adopt TURN's positions. See also D.06-09-008 at p. 10 (agreeing	

	that TURN made a substantial contribution to a proceeding "because the decision addressed issues raised by TURN and an Alternate Decision relied on several of TURN's proposals"). The fact that the Commission initially issued a proposed decision that would have taken a position strongly in keeping with the position advocated by CforAT indicates that CforAT's advocacy contributed to the Commission's consideration of these issues.	
CforAT identified that implementation of affordability metrics in various proceedings has helped to make questions of affordability a fundamental part of the record and supported this greater visibility of affordability considerations. Comments on 2022 ACR at pp. 2-3.	While the Commission narrows the number of individual proceedings requiring metrics, it requires additional context alongside the affordability metrics in order to produce more robust information. Final Decision at pp. 79, 81. This is consistent with CforAT's support for improving visibility of affordability issues. In addition, the Final Decision confirms that assigned Commissioners and Administrative Law Judges retain the discretion to require affordability metrics in individual proceedings and "encourage[s] parties to request inclusion of affordability metrics as appropriate via existing mechanisms." Final Decision at pp. 30, 77-78.	
CforAT noted the substantial affordability impacts of advice letter filings and requested that the Commission require the use of affordability metrics in any advice letter filing that crosses the 1% revenue requirement threshold. Comments on 2022 ACR at pp. 3-4.	While the Final Decision "narrows the requirement to include affordability metrics in all applications meeting certain criteria to only GRC applications meeting certain criteria," it justifies this more limited submission of affordability metrics with the additional new requirements for greater context, responding to arguments that affordability metrics should be submitted more widely. Final Decision at p. 41. As one of the parties	

CforAT supported the ongoing use of affordability metrics and advocated for expanded use of affordability metrics into any activity that results in substantial bill increases for customers. In addition, CforAT noted the importance of Commission action in response to affordability metrics in order to alleviate burdens for customers. Comments on 2022 ACR at pp. 5-6. CforAT identified that the Affordability Report focuses on the most vulnerable geographic communities and discussed that not all highly burdened customers are clustered geographically in identifiable communities, including CforAT's constituents. CforAT recommended that the Affordability Report better reflect that affordability challenges are not limited to the most burdened geographic areas. Comments on 2022 ACR at pp. 10-11.	advocating for wider use of affordability metrics, CforAT's input nevertheless informed the Commission's deliberation on this issue. Consistent with CforAT's support for expanded use of the metrics and consideration of affordability, the Final Decision requires additional contextual data to inform a more robust understanding of affordability. Final Decision at p. 41. Consistent with CforAT's call for Commission action to improve affordability, the Final Decision acknowledges that "[i]t is critical that the Commission continue to consider a full range of options as to how to reduce electricity bills for customers." Final Decision at p. 72. While the Final Decision does not adopt this recommendation, it implicitly acknowledges the limitations of AACs and geographically-identified communities by stating that "AACs are *one* of several methods of identifying where to find and how to address the needs of the most vulnerable communities and ESJ communities" and that they are "*part* of the analytic toolbox." Final Decision at p. 61 (emphasis added). By consistently raising considerations of vulnerable communities not identified geographically or included in the ESJ definition, CforAT brought these issues to the Commission's attention, which the Commission noted and cited to a subsequent filing. Final Decision at pp. 61-62 footnote 102.	
Reply Comments on 2023 ACR Seeking Annual Feedback (Reply Comments on 2023 ACR)	Consistent with CforAT's refutation of providers' arguments, the Final Decision states that tracking	Verified

CforAT refuted communications providers' previously-rejected arguments that affordability metrics are not applicable to them and constitute rate regulation and recommended that the Commission reject them. CforAT explained that that gathering and presenting affordability data on broadband services is helpful to advancing the Commission's analysis and within the Commission's authority. Reply Comments on 2023 ACR at pp. 1-6, cited in Final Decision at p. 64 footnote 109.	affordability does not constitute rate regulation. Final Decision at p. 66. Consistent with CforAT's support for the use of affordability metrics and the Commission's efforts to advance its understanding of broadband affordability, the Final Decision orders that Commission staff shall gather and analyze communication services affordability data and present recommendations in a report regarding how prices and plans including for broadband service affect Californians in different parts of the state. Final Decision at p. 82.	
CforAT opposed the California Water Association's arguments opposing the Commission's review of affordability metrics in water ratemaking proceedings and supported the usefulness of affordability metrics for water. Reply Comments on 2023 ACR at p. 8.	Consistent with CforAT's support for the use of affordability metrics, the Final Decision requires that Class A water utilities include additional contextual data as recommended by staff to highlight impacts on disadvantaged customers, along with the filing of affordability metrics when required in individual proceedings. Final Decision at pp. 38-40.	
CforAT supported EDF's recommendation that the Commission revise the Affordability Framework to consider the long-term impacts of decarbonization on affordability and give appropriate consideration to the affordability of natural gas going forward into California's clean energy future. Reply Comments on 2023 ACR at pp. 7-8.	While the Final Decision did not directly adopt these recommendations, it summarized parties' concerns regarding the energy transition and affordability, evincing consideration of this concern held by CforAT and other parties. Final Decision at p. 26. Consistent with the need to consider disadvantaged customers who may be among the remaining natural gas customers, the Final Decision requires energy utilities to highlight impacts on the most disadvantaged customers when filing the required affordability metrics. Final Decision at pp. 38-39.	

CforAT opposed the Sempra Utilities' efforts to constrain the proceedings in which affordability metrics are considered and to raise the revenue threshold for inclusion of the metrics. Reply Comments on 2023 ACR at p. 7.	Consistent with CforAT's recommendations, the Final Decision did not adopt a heightened 3-4% revenue threshold as advocated by the Sempra Utilities. Final Decision at p. 41 footnote 65. While the Final Decision narrowed the proceedings requiring affordability metrics, it retained flexibility for consideration of metrics when directed by the assigned Commissioner or Administrative Law Judge, consistent with CforAT's position for wide usage of metrics. Final Decision at p. 30.	
Comments on PD CforAT supported the Commission's determination that "AACs will remain part of the analytic toolbox available to stakeholders and may help identify whether ESJ communities are being disproportionately impacted." Comments on PD at pp. 3-4, citing PD. CforAT recommended that the Commission modify the PD to address impacts on vulnerable communities that are not specifically included in the definition of ESJ communities. Comments on PD at p. 4, cited in Final Decision at pp. 61-61 fn 102. CforAT supported the PD's clarification that an Assigned Commissioner or Assigned Administrative Law Judge retain the authority to require affordability metrics in individual proceedings. Comments on PD at pp. 1-2. CforAT supported the PD's requirement to separate rate impact drivers into operational	Consistent with CforAT's support for the PD using AACs, the Final Decision retains consideration of this method. Final Decision at p. 61. Acknowledging CforAT's input that ESJ communities do not include all vulnerable communities, the Final Decision directly cites CforAT's Comments on PD in footnote 102, stating "As emphasized by CforAT in comments on the proposed decision, individuals with disabilities, including those with Access and Functional Needs and other medical vulnerabilities, are not included in the formal definition of ESJ communities in version 2.0 of the ESJ Action Plan." Final Decision at pp. 61-62. Consistent with CforAT's support for these aspects of the PD, the Final Decision retains: (1) clarification that Commissioners or Administrative Law Judges have discretion to require affordability metrics in individual proceedings; (2) separation of rate impact drivers into operational and capital categories; (3) requirement for energy and Class A water utilities to highlight metrics for vulnerable	Verified

and capital categories. Comments on PD at p. 2. CforAT supported the PD's requirement that energy and Class A water utilities highlight affordability impacts on vulnerable customer groups. Comments on PD at p. 3. CforAT supported the PD's careful review of SDG&E and SCE's motion seeking confidential treatment and explanation of the Commission's confidentiality analysis, noting that utilities often fail to provide fact-specific, well-reasoned explanations to support motions for confidentiality. Comments on PD at p. 3.	customer groups; (4) careful consideration of motions for confidential treatment and explanation of the Commission's analysis. Final Decision at pp. 30, 37, 38, 50-58. While the Final Decision modifies the PD to grant SCE's motion for confidential treatment based on additional information provided, the Final Decision retains careful analysis and explanation. Final Decision at p. 77.	
CforAT supported the PD's rejection of providers' arguments that competition is sufficient to ensure affordability and recommended that the Commission include an acknowledgment that current levels of competition across California are insufficient to ensure the affordability of broadband for every household. Comments on PD at p. 5.	Consistent with CforAT's support for this discussion, the Final Decision retained its discussion that many Californians lack access to multiple providers and that additional information on communications affordability should be gathered and analyzed in a staff report. Final Decision at pp. 65-67.	
CforAT supported the PD's increase of the essential service level of broadband from 25/3 to 100/20. Comments on PD at pp. 5-6.	While the Final Decision did not retain this requirement and determined that it would benefit from additional consideration, CforAT's support for this requirement nonetheless informed the Commission's deliberation on this issue, including the determination that this issue should be addressed within the anticipated staff report on communications affordability. Final Decision at pp. 75-76.	

CforAT emphasized the ongoing need to address affordability in future proceedings, by supporting the flexibility for Commissioners or Administrative Law Judges to require consideration of affordability metrics in individual proceedings and supporting the Commission's ability to collect and analyze information on affordability impacts. Comments on PD at pp. 1-6, cited in Final Decision at p. 77 ("CforAT . . . highlight[s] the need to address affordability concretely in future proceedings"). p. 77.	The Final Decision acknowledges these points by CforAT and in response, "encourage[s] parties to request inclusion of affordability metrics as appropriate via existing mechanisms." Final Decision at pp. 77-78.	

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: At times, CforAT's positions on certain issues overlapped with those of various other parties, including CalCCA, Joint Ratepayers, UCAN, TURN, and EDF.		Noted
d. Intervenor's claim of non-duplication: CforAT's specific focus on our constituency of utility customers with disabilities and medical needs elicited unique contributions. While CforAT's positions at times overlapped with those of other parties, CforAT was the sole party focused on the representation of this vulnerable population. To the		Noted

extent that parties shared positions, this was based on the importance of the issues raised by the proceeding's focus on affordability and should not be the basis of a reduction in compensation.	

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: CforAT's overall cost of participation is reasonable. Affordability of essential supplies of utility services is a key concern for our constituency of customers with disabilities and medical needs, and CforAT has been active in supporting Commission efforts in all industries to ensure such affordability. In this proceeding, CforAT provided input regarding the Commission's use of affordability metrics and an affordability framework in order to support the consideration of overall utility affordability across industries. Utility customers with disabilities and medical needs are disproportionately low-income and also highly dependent on reliable and affordable utility service to support their ability to live independently in their community. While it is difficult to assign a monetary value to CforAT's contributions in Phase 3 of this proceeding, CforAT's efforts to support the consideration of utility affordability will support the ability of our constituency to access essential supplies of utility services at rates they can afford, and thus to maintain their independence. This value exceeds CforAT's reasonable costs of participation.	Noted
b. Reasonableness of hours claimed: In this phase of the proceeding, the Commission addressed the assessment of the affordability framework and evaluated affordability across industries. CforAT's Legal Director, Melissa Kasnitz, took the overall lead in the proceeding, while delegating work addressing communications issues to CforAT's Legal Counsel, Paul Goodman. Mr. Goodman generally serves as CforAT's lead on communications matters before the Commission, so this shared authority was appropriate and efficient. Ms. Kasnitz and Mr. Goodman are both experienced practitioners before the Commission and were able to minimize overlap in their responsibilities. Some amount of coordination and conferencing on the issues pending in this phase of the proceeding is appropriate and necessary, and CforAT's claim should not be reduced based on the modest amount of time spent on such coordination.	Noted

	CPUC Discussion
Additionally, Rachel Sweetnam, CforAT Staff Attorney, assisted in the preparation of this request for compensation. Ms. Sweetnam's rate is substantially lower than the rate of either Ms. Kasnitz or Mr. Goodman, and this delegation was efficient.	
c. Allocation of hours by issue: **Kasnitz Hours - 2020 (0.7 hours)** **Study** (0.7 hours, 100 percent) The issue area "Study" includes time spent on issues involving the Essential Use Study, and includes unclaimed time spent on the Essential Use Study in A.19-11-009. **Kasnitz Hours - 2021 (21.4 hours)** **Study** (10.8 hours, 50.5 percent) **Phase 3**: (10.6 hours, 49.5 percent) The issue area "Phase 3" includes time spent on issues involving public outreach and engagement and affordability issues impacting California ratepayers. **Kasnitz Hours - 2022 (45.6 hours)** **Procedural** (0.9 hours, 2.0 percent) The issue area "Procedural" includes time spent on procedural matters such as scheduling and time spent on issues not covered by another issue area. **Study** (3.6 hours, 7.7 percent) **Phase 3** (24.7 hours, 54.2 percent) **ACR** (16.5 hours, 36.2 percent) The issue area "ACR" includes time spent on issues involving the 2022 Affordability Report. **Kasnitz Hours - 2023 (10.8 hours)** **Procedural** (0.2 hours, 3.5 percent) **Phase 3** (5.5 hours, 96.5 percent):	Noted

	CPUC Discussion
Kasnitz Hours - 2024 (5.7 hours) **Procedural** (0.2 hours, 3.5 percent) **Phase 3** (9.4 hours, 87.0 percent) **Kasnitz Hours - 2025 (2.6 hours)** **PD** (2.6 hours, 100%): The issue area "PD" includes time spent on reviewing and commenting on the Proposed Decision. **Goodman Hours - 2022 (17.4 hours)** **Procedural** (0.3 hours, 1.7 percent) **Phase 3** (4 hours, 23.0 percent) **ACR** (13.1 hours, 75.3 percent) **Goodman Hours – 2023 (0.3 hours)** **Phase 3** (0.3 hours, 100 percent) **Goodman Hours - 2024 (3 hours)** **Phase 3** (3 hours, 100 percent) **Goodman Hours - 2025 (6.8 hours)** **PD** (6.8 hours, 100 percent)	

B. Specific Claim:*

CLAIMED						**CPUC AWARD**		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Melissa W. Kasnitz	2020	0.7	$ 495	D.22-07-023	$ 346.50	0.70	$495 [1]	$346.50

CLAIMED						CPUC AWARD		
Melissa W. Kasnitz	2021	21.4	$ 670	D.22-07-018	$ 14,338.00	20.20 [2]	$670 [1]	$13,534.00
Melissa W. Kasnitz	2022	45.6	$ 690	D.23-03-030	$ 31,464.00	40.35 [3]	$690 [1]	$27,841.50
Melissa W. Kasnitz	2023	10.8	$ 715	D.24-06-018	$ 7,722.00	10.60 [4]	$715 [1]	$7,579.00
Melissa W. Kasnitz	2024	5.7	$ 735	D.24-10-028	$ 4,189.50	3.35 [5]	$735 [1]	$2,462.25
Melissa W. Kasnitz	2025	2.6	$ 755	D.25-10-060	$ 1,963.00	2.60	$755 [1]	$1,963.00
Paul Goodman	2022	17.4	$ 550	D.23-03-030	$ 9,570.00	15.40 [6]	$550 [7]	$8,470.00
Paul Goodman	2023	0.3	$ 575	D.24-03-025	$ 172.50	0.30	$575 [7]	$172.50
Paul Goodman	2024	3	$ 625	D.25-04-018	$ 1,875.00	3.00	$625 [7]	$1,875.00
Paul Goodman	2025	6.8	$680	See comments below	$ 4,624.00	5.30 [8]	$680 [7]	$3,604.00
					Subtotal: $ 76,264.50			***Subtotal: $67,847.75***
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Rachel Sweetnam	2026	14.7	$ 137.50	½ approved 2025 rate (D.25-10-050) See comments below	$ 2,021.25	9.70 [9]	$ 137.50 [10]	$1,333.75
					Subtotal: $ 2,021.25			***Subtotal: $1,333.75***
					TOTAL REQUEST: $ 78,285.75			***TOTAL AWARD: $69,181.50***

*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. 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.

CLAIMED			CPUC 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**
Melissa W. Kasnitz	1992	162679	No
Paul Goodman	2002	219086	No
Rachel Sweetnam	2023	350075	No

C. Attachments Documenting Specific Claim and Comments on Part III[4]:

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Time Records, including merits and time on compensation
A	Rate for Paul Goodman in 2025: On September 23, 2025, CforAT filed an intervenor compensation claim in A.19-11-003 that included a request that the Commission adopt an hourly rate of $680 for CforAT's Legal Counsel, Paul Goodman, based on the Market Rate Study and guidance adopted in Resolution ALJ-393, issued on December 22, 2020. The Commission has not yet acted on that intervenor compensation claim. Rather than repeat the same showing here for the requested hourly rate for Mr. Goodman, CforAT refers the Commission to the showing presented in A.20-11-001.
B	Rates for Time Spent on Compensation Request: While this compensation request was drafted in 2026, all the recorded work on the merits took place in 2025 or earlier. For this reason, CforAT is requesting time spent on compensation at ½ the standard rates for 2025. We will request updated rates for 2026 rates in a later compensation request.

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1]	D.22-07-023 approved the 2020 hourly rate of $490.00 for Melissa W. Kasnitz as a Legal – Legal Director - III.

[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.

<table>
<tr><th>Item</th><th>Reason</th></tr>
<tr><td>Melissa W. Kasnitz’s 2020-2025 Hourly Rate</td><td>D.22-07-018 approved the 2021 hourly rate of $670.00 for Melissa W. Kasnitz as a Legal – Legal Director - III.

D.23-03-030 approved the 2022 hourly rate of $690.00 for Melissa W. Kasnitz as a Legal – Legal Director - III.

D.24-06-018 approved the 2023 hourly rate of $715.00 for Melissa W. Kasnitz as a Legal – Legal Director - III.

D.24-10-028 approved the 2024 hourly rate of $735.00 for Melissa W. Kasnitz as a Legal – Legal Director - III.

D.25-10-060 approved the 2025 hourly rate of $755.00 for Melissa W. Kasnitz as a Legal – Legal Director - III.</td></tr>
<tr><td>[2] Reduction of Hours for Melissa W. Kasnitz in 2021</td><td><u>Administrative and Clerical Work</u>

The Commission does not compensate attorneys for time spent on clerical or administrative tasks, as such work is considered subsumed within professional fees. Administrative tasks typically include scheduling, communications with the Commission’s Docket Office regarding filing procedures, overseeing administrative staff, photocopying, scanning, and other similar clerical activities. (See D.11-07-024 at 18.) In line with this policy, we have adjusted the entries below for a total reduction of 1.20 hours:

<table>
<tr><th>Date</th><th>Activity</th><th>Hours</th></tr>
<tr><td>2/23/2021</td><td>Review Agenda & White Paper on utility rates and affordability in the future (in advance of 2/24 En Banc)</td><td>0.80</td></tr>
<tr><td>7/6/2021</td><td>Review notice re: 7/20 meeting; email exchange w/ P. Kahn re: same</td><td>0.20</td></tr>
<tr><td>10/13/2021</td><td>Review meeting notices & agendas re: EUS status</td><td>0.20</td></tr>
</table></td></tr>
<tr><td>[3] Reduction of Hours for Melissa W. Kasnitz in 2022</td><td><u>Internal Duplication</u>

The Commission compensates intervenors for reasonable and efficient participation that contributes to the development of the record and aids in decision-making. However, we find that CforAT's claimed hours reflect a some duplication of effort. Specifically, multiple representatives, whether attorneys or experts—worked on the same issues, frequently emailed, conferred, and reviewed each other’s work, attended the same meetings, hearings, or workshops, and participated in activities where only one</td></tr>
</table>

<table>
<tr><th>Item</th><th>Reason</th></tr>
<tr><td></td><td>
representative would have been sufficient, given the relative simplicity or limited scope of the issues involved.
This level of staffing resulted in unnecessary, redundant, and inefficient participation that did not provide added value to the proceeding. Accordingly, we find that the involvement of multiple representatives in these instances was not justified. As a result, we reduce the entries below by a total of 3.00 hours to ensure that only reasonable and non-duplicative efforts are compensated.
<table>
<tr><th>Date</th><th>Activity</th><th>Hours</th></tr>
<tr><td>2/9/2022</td><td>Call w/ P. Goodman re: En Banc and key issues</td><td>0.20</td></tr>
<tr><td>2/15/2022</td><td>Call w/ P. Goodman re: letter addressing need to include people with disabilities</td><td>0.20</td></tr>
<tr><td>3/31/2022</td><td>Review slides in advance of working group meeting; call w/ P. Goodman re: same</td><td>0.30</td></tr>
<tr><td>7/20/2022</td><td>Outline Phase 3 Comments on ACR; call w/ P. Goodman re: same</td><td>0.50</td></tr>
<tr><td>7/27/2022</td><td>Draft comments re: public outreach efforts; call w/ P. Goodman re: same</td><td>2.00</td></tr>
<tr><td>7/28/2022</td><td>Draft comments on Listening Sessions; call w/ P. Goodman re: same</td><td>2.00</td></tr>
<tr><td>10/12/2022</td><td>Conf. w/ K. Woodford re: community outreach on experiences w/ energy affordability and plan for support at upcoming listening sessions</td><td>0.40</td></tr>
<tr><td>11/29/2022</td><td>Conf. w/ P. Goodman re: communications issues addressed in comments; email exchange re: same</td><td>0.30</td></tr>
</table>
<u>Excessive Hours</u>
While CforAT’s arguments were helpful, the number of hours claimed for certain tasks is excessive relative to their impact. Excessive hours occur when the time claimed is disproportionate to the reasonable amount of effort required for the contribution. The burden of proof is on the intervenor to demonstrate that each hour claimed was spent productively making a substantial contribution to the decision. In this instance, CforAT did not provide sufficient justification for the hours claimed.
Specifically, CforAT’s 11/30/2022 comments on the 2020 Affordability Report did not justify the 4.50 hours claimed. The filing mainly restated positions CforAT had already advanced in earlier submissions and did not include new factual analysis, data review, or methodological evaluation. The comments provided high-level feedback on a retrospective staff report and did
</td></tr>
</table>

<table>
<tr><th>Item</th><th>Reason</th></tr>
<tr><td></td><td>not develop new substantive content or conduct independent analysis of the underlying affordability metrics. Therefore, we reduce 50%, or 2.25 hours from this effort to ensure that awarded hours are proportional to the work performed. For comments of this nature, brief, reiterative, and non-analytical, the Commission finds 2.25 hours reasonable.
The total number of reductions for Melissa W. Kasnitz is 5.25 hours, leaving 40.35 hours approved for compensation in 2022.</td></tr>
<tr><td>[4]
Reduction of Hours for Melissa W. Kasnitz in 2023</td><td><u>Administrative and Clerical Work</u>

The Commission does not compensate attorneys for time spent on clerical or administrative tasks, as such work is considered subsumed within professional fees. Administrative tasks typically include scheduling, communications with the Commission’s Docket Office regarding filing procedures, overseeing administrative staff, photocopying, scanning, and other similar clerical activities. (See D.11-07-024 at 18.) In line with this policy, we have adjusted the entries below for a total reduction of 0.20 hours:

<table><tr><th>Date</th><th>Activity</th><th>Hours</th></tr><tr><td>1/30/2023</td><td>Review notice of en banc re: natural gas & electricity price increases</td><td>0.20</td></tr></table></td></tr>
<tr><td>[5]
Reduction of Hours for Melissa W. Kasnitz in 2024</td><td><u>Excessive Hours</u>

While CforAT’s arguments were helpful, the number of hours claimed for certain tasks is excessive relative to their impact. Excessive hours occur when the time claimed is disproportionate to the reasonable amount of effort required for the contribution. The burden of proof is on the intervenor to demonstrate that each hour claimed was spent productively making a substantial contribution to the decision. In this instance, CforAT did not provide sufficient justification for the hours claimed.

Specifically, the work performed between 2/14/2024 - 2/17/2024 related to the reply comments submitted on February 16, 2024, addressed issues that CforAT had already raised in earlier filings and did not include new factual analysis, data review, or methodological evaluation. The filing consisted largely of reiterating prior positions and citing earlier findings rather than developing new substantive content. The Implementation Ruling itself requested focused, high-level feedback, and CforAT’s reply comments reflected that limited scope. As a result, the level of effort claimed, reviewing party comments, outlining reply positions, and drafting short narrative responses does not justify the 4.70 hours requested. Therefore we reduce 50% or, 2.35 hours from these efforts to ensure that claimed hours are proportional to the work performed.</td></tr>
</table>

Item	Reason
	For reply comments of this nature, brief, reiterative, and non-analytical, the Commission finds 2.35 hours reasonable.
[6] Reduction of Hours for Paul Goodman in 2022	<u>*Excessive Hours*</u> While CforAT's arguments were helpful, the number of hours claimed for these tasks is excessive relative to their impact. Excessive hours occur when the time claimed is disproportionate to the reasonable amount of effort required for the contribution. The burden of proof is on the intervenor to demonstrate that each hour claimed was spent productively making a substantial contribution to the decision. In this instance, CforAT did not provide sufficient justification for the hours claimed. Specifically, the work performed between 11/15/2022 - 12/1/2022 related to the opening comments submitted largely reiterated positions CforAT had already advanced earlier in the proceeding and did not include new factual analysis, data review, or methodological evaluation. The filing also explicitly declined to answer several questions in the ruling, further limiting the substantive scope of the submission. As a result, the level of effort claimed drafting short comments, reviewing opening comments, and providing high-level narrative feedback does not justify the 7.50 hours requested across these entries. Therefore we make a 2.00-hour reduction to ensure that awarded hours are proportional to the work performed. For comments of this nature, brief, reiterative, non-analytical, and declining to respond to portions of the ruling, the Commission finds this reduction reasonable.
[7] Paul Goodman 2022-2025 Hourly Rate	D.23-03-030 approved the 2022 hourly rate of $550.00 for Paul Goodman as a Legal – Attorney - V. D.24-03-025 approved the 2023 hourly rate of $575.00 for Paul Goodman as a Legal – Attorney - V. D.25-04-018 approved the 2024 hourly rate of $625.00 for Paul Goodman as a Legal – Attorney - V. CforAT requested a 2025 rate of $680 and a second 5% step increase for Paul Goodman. D.25-04-018 verified a 2024 rate of $625 for Paul Goodman as a Legal – Attorney – V. With an adopted 2024 rate of $625, a 2025 escalation factor of 3.46% plus a 5% step increase, would yield $680 when rounding to the nearest $5 increment. (Range is $584 to $797). We find the 2025 hourly rate of $680 to be reasonable and adopt it here.
[8] Reduction of Hours for	<u>*Excessive Hours*</u>

Item	Reason
Paul Goodman in 2025	While CforAT's arguments were helpful, the number of hours claimed is excessive relative to their impact. Excessive hours occur when the time claimed is disproportionate to the reasonable amount of effort required for the contribution. The burden of proof is on the intervenor to demonstrate that each hour claimed was spent productively making a substantial contribution to the decision. In this instance, CforAT did not provide sufficient justification for the hours claimed. Specifically, the work performed between 12/1/2025 - 12/8/2025 related to the comments to the Proposed Decision were brief, less than six pages, and consisted largely of reiterating positions CforAT had already advanced earlier in the proceeding. The filing did not include new factual analysis, data review, or methodological evaluation, and CforAT did not demonstrate why the level of effort claimed was necessary for a short, narrative comment. While preparing and drafting formal comments is a compensable activity, such work, especially performed by an experienced attorney, should be more efficient. Given the contents and length of the final document, 6.30 hours claimed is excessive. Therefore, we reduce 1.50 hours from these efforts to ensure that awarded hours are proportional to the work performed. Because the filing was short, non-analytical, and largely reiterative, and because CforAT did not justify the additional time claimed, a 1.50 hours reduction is reasonable.
[9] Excessive IComp Claim Prep Hours	Rachel Sweetnam claimed 14.70 hours in 2026 for preparation of the intervenor compensation request. While the claim was detailed, organized, and generally compliant with Commission requirements, we find the preparation hours excessive given the scope of issues and overall scale of the request. Rachel Sweetnam has several years of experience practicing before the Commission and preparing similar claims, and we would expect greater efficiency in compiling this request. Accordingly, we reduce the claimed hours by 5.00 hours, awarding 9.70 hours for claim preparation in 2026. This adjustment better reflects the complexity and scale of the request.
[10] Rachel Sweetnam 2026 Hourly Rate	As noted in Part III.C, although this compensation request was drafted in 2026, all substantive work on the merits occurred in 2025 or earlier. Consequently, CforAT requests compensation for time spent on this claim at half of the standard 2025 rates. Updated 2026 rates will be requested in a subsequent compensation claim. D.25-10-060 verified Rachel Sweetnam's 2025 hourly rate at $275. Accordingly, we adopt this rate to determine the 2026 Intervenor Compensation (IComp) preparation fees for CforAT. Because preparation

Item	Reason
	hours are compensated at half of the practitioner's standard hourly rate, a final rate of $137.50 is applied for 2026.

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

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

B. Comment Period: Was the 30-day comment period waived (*see* Rule 14.6(c)(6))?	Yes

FINDINGS OF FACT

1. Center for Accessible Technology has made a substantial contribution to D.25-12-044.

2. The requested hourly rates for Center for Accessible Technology's representatives, as adjusted herein, 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 $69,181.50.

CONCLUSION OF LAW

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

ORDER

1. Center for Accessible Technology is awarded $69,181.50.

2. Within 30 days of the effective date of this decision, the California Public Utilities Commission shall pay Center for Accessible Technology 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 Center for Accessible Technology'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 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:	D2609037	**Modifies Decision?**	No
Contribution Decision(s):	D2512044		
Proceeding(s):	R1807006		
Author:	ALJ Camille Watts-Zagha		
Payer(s):	California Public Utilities Commission		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Center for Accessible Technology	February 20, 2026	$78,285.75	$69,181.50	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
Melissa	Kasnitz	Attorney	$ 495	2020	$ 495
Melissa	Kasnitz	Attorney	$ 670	2021	$ 670
Melissa	Kasnitz	Attorney	$ 690	2022	$ 690
Melissa	Kasnitz	Attorney	$ 715	2023	$ 715
Melissa	Kasnitz	Attorney	$ 735	2024	$ 735
Melissa	Kasnitz	Attorney	$ 755	2025	$ 755
Paul	Goodman	Attorney	$ 550	2022	$ 550
Paul	Goodman	Attorney	$575	2023	$575
Paul	Goodman	Attorney	$ 625	2024	$ 625
Paul	Goodman	Attorney	$ 680	2025	$ 680
Rachel	Sweetnam	Attorney	$ 275	2025	$ 275

(END OF APPENDIX)