

Decision 26-09-070 September 17, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Examine
Electric Utility De-Energization of Power
Lines in Dangerous Conditions.

Rulemaking 18-12-005
(Filed: December 18, 2018)

**DECISION GRANTING COMPENSATION TO CENTER FOR ACCESSIBLE
TECHNOLOGY FOR SUBSTANTIAL CONTRIBUTION TO DECISION 25-10-038**

Intervenor: Center For Accessible Technology (CforAT)	For contribution to Decision (D.) 25-04-019, D.25-10-038; Resolution M-4876 Approving Administrative Enforcement Order (AEO)
Claimed: \$88,738.75	Awarded: \$67,033.25
Assigned Commissioner: John Reynolds	Assigned ALJs: Regina DeAngelis and Valerie Kao

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.25-04-019 (the Rehearing Decision) denied CforAT's Application for Rehearing of D.24-12-005, which denied CforAT's request for an Order to Show Cause against Southern California Edison (SCE) for failures in implementing its de-energization program during the 2023-2024 wildfire season. D.25-10-038 (the PFM Decision) denied CforAT's petition for modification (PFM) of Decision (D.) 24-12-005. The PFM sought modifications to D.24-12-005 denying request for an Order to Show Cause against Southern California Edison (SCE) for failures in implementing its de-energization program during the 2023-2024 wildfire season and citing on ongoing failures during the 2024-2025 wildfire season. The PFM Decision relied on the Commission's finding in D.24-12-005 that the Commission's Safety and Enforcement Division has the authority to address-
--	--

	CforAT's concerns and also noted its own ongoing authority to issue an order to show cause or take other action on its own initiative. The Draft Resolution M-4876 Approving AEO gave Commission approval to SED's AEO with SCE, which assessed a fine against SCE for its violations of de-energization requirements during the 2022 and 2023 wildfire seasons.
--	--

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:	2/19/2019	Verified
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	3/15/2019	3/13/2019
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	
6. Date of ALJ ruling:	See comment below	
7. Based on another CPUC determination (specify):	D.20-06-046, see comment below.	Verified. D.20-06-046 awarded compensation to CforAT in R.18-12-005. Rule 17.2 of the Commission's Rules of Practice and Procedure states that "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."

¹ All statutory references are to the Public Utilities Code (Pub. Util. Code), unless indicated otherwise.

	Intervenor	CPUC Verification
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:	See comment below	
10. Date of ALJ ruling:	See comment below	
11. Based on another CPUC determination (specify):	D.20-06-046, see comment below.	Verified. D.20-06-046 awarded compensation to CforAT in R.18-12-005. Rule 17.2 of the Commission’s Rules of Practice and Procedure states that “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.”
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.25-04-019; Resolution M-4876; D.25-10-038	Verified
14. Date of issuance of Final Order or Decision:	4/4/2025; 7/25/2025; 11/4/2025	Timeliness verified for D.25-04-019 and D.25-10-038. Request not timely regarding Resolution M-4876: (1) Resolution M-4876 was not issued in R.18-12-005, the proceeding that includes the other two named decisions in CforAT’s request, D.25-04-019 and D.25-10-038; (2) Resolution M-4876 was issued on July 25, 2025 and CforAT filed this request on December 19, 2025, which is

	Intervenor	CPUC Verification
		after the timeline set forth in Section 1804(c).
15. File date of compensation request:	12/19/2025	Verified
16. Was the request for compensation timely?		Yes, in part.

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
	CforAT has previously been determined to be eligible for compensation and has been awarded compensation for substantial contributions to prior decisions in this proceeding. D.20-06-046, issued on June 29, 2020; D.21-07-026, issued on July 16, 2021, and D.22-09-022, issued on September 21, 2022; D.25-07-028, issued on July 24, 2025. 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.” CPUC Rules of Practice and Procedure, Rule 17.2	Verified. <i>See</i> Part I.B, above.

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. Overview: From the initiation of R.18-12-005, CforAT has been one of the most active intervenors, representing the interests of people with disabilities and medical needs who are at high risk when utilities shut off power to customers. While the	The Commission has previously affirmed the value of CforAT's participation in this proceeding in D.25-07-028, awarding compensation for work including reviewing and commenting on utility reports, commenting on draft resolutions, and filing the Motion for OSC against SCE for its failures in implementing	Noted. <i>See</i> Part III.D CPUC Comments, Disallowances, and Adjustments.

² D.25-07-028 was issued on July 28, 2025.

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
R.18-12-005 docket was open, CforAT participated in virtually every comment cycle and also consistently submitted comments on utility post-event, post-season, and pre-season reports, actively monitoring the utilities' implementation of de-energization events. Since the 2023-2024 wildfire season, CforAT has raised concerns specifically regarding SCE's frequent use of de-energization and its consistently poor notification performance. In addition to providing comments on various reports, CforAT filed a motion requesting that the Commission issue an Order to Show Cause (OSC) to further investigate the problems documented. Following the issuance of D.24-12-005 closing the proceeding and denying the Motion for OSC, CforAT has been unable to devote our limited resources to reviewing and commenting on utility reports memorializing the many, ongoing de-energization events, due to the lack of an available avenue to seek intervenor compensation for this work. CforAT explained this situation in an ex parte letter sent to President Reynolds and served on the R.18-12-005 service list on	de-energization events during the 2023-2024 wildfire season. Consistent with past efforts, CforAT's filings and various advocacy efforts have made substantial contributions to Commission Decisions D.25-04-019 (the Rehearing Decision), D.25-10-038 (the PFM Decision), and Resolution M-4876 Approving Administrative Enforcement Order (AEO) for SCE's 2022-2023 Seasons, in which the Commission considered CforAT's ongoing documentation and analysis supporting repeated requests for enforcement action against SCE. CforAT's focus on SCE's ongoing de-energization failures has elevated the importance and urgency of these issues to the Commission. While the Commission has declined to pursue formal enforcement action within the proceeding as requested by CforAT, the Commission has taken parallel action, specifically articulating its concerns about SCE's de-energization performance in a manner that focuses on the same issues raised by CforAT and calling for biweekly meetings for the utility to demonstrate improvements. This demand was set forth in an October 3, 2025 letter from President Reynolds to SCE (President Reynolds' Letter, included as an attachment). This letter specifically echoes concerns about SCE that CforAT has repeatedly raised in our filings and	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
December 11, 2024 and requested that the Commission maintain an active forum for stakeholder review of utilities' de-energization events. In January 2025 (part of the 2024-2025 wildfire season), customers and communities in southern California were devastated by historic wildfires, which have been plausibly linked to SCE's facilities. Various reports have also demonstrated that urgent communications and information regarding these emergent fires and evacuation orders were substantially hindered by large-scale, de-energization events that SCE executed concurrent with the wildfires. During these de-energization events (SCE 24-21 and SCE 24-22), SCE failed to meet a historic number of notification obligations and failed to responsibly implement large-scale power shutoffs. These massive failures by the utility capped off its highly active 2024 season, during which SCE demonstrated a worse performance than its 2023 season despite its claims (in response to CforAT's filings) that it would conduct a comprehensive remediation effort following the 2023-2024 season.	advocacy efforts, including its substantial levels of de-energization activity which dramatically outpace that of the other utilities, unclear and insufficient reporting following its prolonged events, ongoing notification issues, and negative impacts on its customers and communities. President Reynolds' Letter at pp. 1-3. CforAT's efforts to bring attention to SCE's ongoing challenges have contributed to this activity, as well as to the significance of the repeated assertions of the Commission's authority to take further enforcement action. Whether or not CforAT's efforts directly led to President Reynolds' Letter, CforAT's substantial efforts to raise concerns regarding SCE's de-energization performance in the docket of R.18-12-005 have required the Commission to repeatedly give consideration to these issues, which is a substantial contribution in itself. CforAT has substantially enriched the record on SCE's de-energization issues by both providing detailed documentation and analysis, as well as eliciting information from other stakeholders. This enriched record is echoed in the Commission's parallel enforcement action articulated in President Reynolds' Letter. The fact that the Commission did not grant CforAT's specific enforcement requests does not prevent an award of compensation. It is well established that an intervenor may be awarded	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
While the Commission closed the R.18-12-005 docket in D.24-12-005, urgent issues persist, particularly regarding SCE's flawed implementation of frequent de-energization events. As discussed in detail below, CforAT has engaged in ongoing and substantial efforts to chronicle the myriad problems with SCE's implementation of de-energization events and bring them to the attention of the Commission and advocate for improved oversight and enforcement efforts. These efforts include preparation and support of our Application for Rehearing of D.24-12-005, comments on Draft Resolution M-4876 Approving AEO, preparation and support of our Petition for Modification of D.24-12-005, and various other advocacy efforts.	compensation even if the Commission does not adopt its recommendations as long as the intervenor's input enhances the ability of the Commission to effectively consider the issues before it. Specifically, the Commission has recognized that it "may benefit from an intervenor's participation even where the Commission did not adopt any of the intervenor's positions or recommendations." D.08-04-004 at pp. 5-6; <i>see also</i> D.09-04-027 at p. 4 (awarding compensation to TURN and found a substantial contribution even on issues where TURN did not prevail as TURN's efforts "contributed to the inclusion of these issues in the Commission's deliberations"). Here, CforAT's input on SCE's challenges implementing its de-energization program have substantially contributed to the Commission's deliberations and repeatedly elevated these issues to the attention of the Commission. The Commission has also determined that it can find that a customer made a substantial contribution "if a customer provided a unique perspective that enriched the Commission's deliberations and the record." D.08-04-004 at p. 5. CforAT's representation of our constituency of customers with medical needs and disabilities, who are most severely at risk during de-energization, has elicited a unique contribution throughout all our efforts in this proceeding. In addition,	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
	CforAT's focus on SCE's de-energization issues, particularly its notification problems, has enriched the Commission's deliberations and the record by specifically elevating these concerns to the Commission's consideration. Further details about CforAT's ongoing contributions are set forth below.	
2. Application for Rehearing: CforAT filed an Application for Rehearing of D.24-12-005 on January 8, 2025. The Application for Rehearing argued that the Commission committed legal error by denying our Motion for OSC in D.24-12-005 because it failed to ensure that electric utilities (specifically SCE) execute de-energization events in compliance with Sections 451 and 399.2(a) of the California Public Utilities Code and by failing to demonstrate reasoned agency decision-making. In the Application for Rehearing, CforAT described SCE's then-ongoing large-scale SCE 24-21 event in the context of its ongoing pattern of failures during de-energization events and the ongoing need for the Commission to maintain an open forum for addressing	While the Commission did not grant CforAT's Application for Rehearing, CforAT's arguments informed the Commission's deliberation on these issues and enhanced the Commission's ability to consider these issues. Rehearing Decision at p. 2 ("We have carefully considered all the arguments presented by CforAT and find that CforAT has failed to demonstrate any legal error in the Decision that would warrant rehearing.") CforAT's Application also elicited more information for the record regarding SCE's de-energization activity as the Acton Town Council filed a response in support of the Application and described Acton's experience of shutoffs despite lack of fire weather and SCE's failure to appropriately limit the scope of de-energization events. Response by Acton Town Council, filed January 23, 2025, at pp. 1-11, cited in Rehearing Decision at p. 1.	Noted. <i>See</i> Part III.D CPUC Comments, Disallowances, and Adjustments.

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
de-energization events, which have substantial public safety impacts on customers and communities. The Application for Rehearing also presented SCE's ongoing de-energization problems and the issues raised by stakeholders, illustrating the disconnect between these urgent issues and D.24-12-005's determination that no issues remain and that the proceeding should be closed. <i>See generally</i> Application for Rehearing at pp. 1-22, including as follows: • Application for Rehearing at pp. 2-5, 12-20 (highlighting the need for utility mitigation support and effective notification during de-energization events); • Application for Rehearing at pp. 1, 10-15 (emphasizing the need to comply with Section 451); • Application for Rehearing at p. 14 ("SCE specifically has consistently failed to meet Commission notification requirements during de-energization events and has far exceeded the other utilities in number of de-energization events executed");	Finally, the Application for Rehearing and the additional information added to the record supported further scrutiny through the PFM and the eventual decision of the Commission President to demand further action from SCE to improve its implementation of de-energization activity. While CforAT's input was not cited, President Reynolds' Letter to SCE raises concerns that are consistent with the issues raised in CforAT's Application for Rehearing and demonstrates that CforAT's input informed and led the Commission to take action to address these concerns. Indeed, the letter identifies the very same issues identified in CforAT's Application for Rehearing, including the importance of utility "actions leading up to, during, and after any PSPS event—especially timely and effective notifications," the need to comply with Section 451 of the Public Utilities Code, the much greater frequency and scope of SCE's de-energization events relative to other utilities, and the hardships of prolonged large-scale shutoffs for customers, particularly those with medical needs who rely on electricity for health and safety. President Reynolds' Letter at pp. 1-3. President Reynolds' Letter also specifically acknowledges that shutoffs can "jeopardiz[e] the safety of customers with medical needs," reflecting CforAT's unique perspective and input on de-energization issues as a	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
• Application for Rehearing at pp. 2-4; 7-8, 13-15, 17-21 (emphasizing impacts of shutoffs, particularly for vulnerable customers); • Application for Rehearing at pp. 3-6, 8, 14-15, 17-21 (emphasizing SCE's ongoing pattern of de-energization issues and the need for improvement and effective oversight); • Application for Rehearing at pp. 1, 10-15 (arguing that D.24-12-005 includes legal error based on the Commission's failure to ensure that utilities implement de-energization in a manner that complies with statutory requirements to safely operate the electrical grid); • Application for Rehearing at pp. 5-14, 15-22 (emphasizing the need for ongoing and effective oversight of de-energization events, particularly for SCE).	representative of this constituency. President Reynolds' Letter at p. 2. Consistent with CforAT's arguments highlighting the need for improvement and enforcement action regarding SCE's de-energization issues and ongoing notification problems, President Reynolds' Letter calls for improvements to SCE's de-energization program and requires SCE to participate in biweekly meetings with the CPUC and Energy Safety to address concerns "regarding de-energization scope and duration, as well as notification processes." President Reynolds' Letter at pp. 2-3. Consistent with CforAT's arguments that the Commission must fulfill its responsibility to ensure that the utilities uphold their statutory requirements to safely operate the electrical grid, President Reynolds' Letter states that "[t]he safety, health, and well-being of Californians requires safe and reliable access to electricity, which remains the Commission's top priority. SCE leadership must fulfill its responsibility to safely implement the updated PSPS program with minimal customer impact." President Reynolds' Letter at p. 3. Consistent with CforAT's arguments emphasizing the need for meaningful oversight of de-energization (particularly for SCE), President Reynolds' Letter resolves that "[t]he Commission will continue to closely monitor SCE's implementation, and nothing in this letter precludes future	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
	enforcement action.” President Reynolds’ Letter at p. 3.	
3. Comments on Draft Resolution M-4876 Approving AEO: CforAT submitted comments on Draft Resolution M-4876 Approving Administrative Enforcement Agreement (AEO) of the Safety and Enforcement Division (SED) and SCE Regarding 2022 and 2023 PSPS Requirement Violations Pursuant to Resolution M-4846 (Draft Resolution M-4876). The Draft Resolution M-4876 gave Commission approval to SED’s AEO with SCE, which assessed a total fine of \$826,260 against SCE for its violations during the 2022 and 2023 season. CforAT’s Comments on Draft Resolution M-4876 analyzed each of the five Penalty Assessment Methodology factors and argued that a more robust analysis, rather than the limited one provided in the AEO, would appropriately result in a greater financial penalty. CforAT also argued that the AEO and ACO processes remain inadequate to address SCE’s ongoing notification issues, pointing to the utility’s failure to show improvement over time and	While the Draft Resolution was not modified in response to CforAT’s comments, the Commission nevertheless considered CforAT’s input, and the material submitted by CforAT has helped to build a record in support of ongoing and future oversight of the utilities’ de-energization by SED. Resolution M-4876, issued July 24, 2025, at p. 4 (“Comments were timely received from the Center for Accessible Technology (CforAT) on July 10, 2025. CforAT argues that the penalties set forth in the AEO are inadequate to address SCE’s violations, and addresses the five Penalty Assessment Methodology factors to argue a larger financial penalty is warranted. CforAT further argues the AEO and ACO processes are inadequate to address SCE’s notification issues. Instead, CforAT asks for an Order to Show Cause (OSC) to be issued against SCE, consistent with its pending Petition for Modification (filed July 1, 2025) of D.24-12-005 which denied CforAT’s OSC motion and closed the PSPS Rulemaking (R.) 18-12-005.”) CforAT’s input on the Draft Resolution provided a unique perspective of customers with medical needs and disabilities on these issues and enhanced the ability	Verified. CforAT’s request for compensation is untimely regarding Resolution M-4876, per discussion below.

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
requesting that the Commission grant CforAT's then-pending Petition for Modification to initiate an OSC against SCE. Comments on Draft Resolution M-4876 at pp. 1-17. CforAT further argued that the staff administrative processes have been inadequate to address SCE's failures or achieve improvement and that greater enforcement action is needed. Comments on Draft Resolution M-4876 at pp. 13-17. CforAT stated "[f]urther action is urgently needed to examine SCE's larger pattern of notification problems and to promote prompt corrective action in advance of future de-energization events." Comments on Draft Resolution M-4876 at p. 16.	of the Commission to consider these issues. In meetings with SED regarding the Division's supervision of the de-energization programs of the utilities, SED Staff have repeatedly confirmed their appreciation for the input provided by CforAT. CforAT's Comments on Draft Resolution M-4876, along with our other ongoing advocacy, provided the Commission with information and the opportunity to consider the urgency of SCE's severe and ongoing de-energization issues, enhancing the Commission's deliberation on these issues. As noted above, President Reynolds' Letter is consistent with CforAT's recommendations that greater oversight than the staff review process is necessary to address SCE's deficiencies and that there is a need for the utility to provide more detailed information regarding its underlying issues and remediation efforts to the Commission and stakeholders. Accordingly, the Letter directs SCE to attend mandated biweekly meetings and "to demonstrate how it plans to create measurable improvements in the extent, scope, and duration of its PSPS events, as well as in the "timeliness, accuracy, and effectiveness of its notifications." President Reynolds' Letter at p. 2.	
4. Petition for Modification:		Noted. <i>See</i> , Part III.D.

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
CforAT filed a Petition for Modification of D.24-12-005 (PFM) on July 1, 2025. The PFM requested that the Commission modify D.24-12-005 to initiate an OSC against SCE for its ongoing de-energization issues, with the basis for the renewed request relying on new facts regarding SCE's worsening notification performance over the 2024 season and culminating in historic failures during the January 2025 events, as well as SCE's failure to present a meaningful action plan for addressing its overwhelming failures, and the insufficiency of SED's review processes to resolve SCE's pervasive notification failures. PFM at pp. 18-58. In preparing the PFM, CforAT analyzed the various event reports filed by SCE during the 2024-2025 wildfire season (as noted above, CforAT was unable to dedicate resources to preparing comments on individual event reports due to the lack of an open proceeding), contributing to the factual record for the Commission's review. CforAT also filed a Reply to the Responses to PFM (Reply) on August 11, 2025, cited in the PFM Decision at p. 4. This Reply provided further updated to the factual record regarding SCE's ongoing	While the Commission declined to grant the PFM, it confirmed that CforAT fulfilled all the procedural requirements for filing a PFM and considered the concerns raised by CforAT regarding SCE's administration of de-energization events during the 2023 and 2024 seasons in its deliberation, including that it addressed new facts. PFM Decision at pp. 5-7. The Commission acknowledged the legitimacy of the concerns raised by CforAT while stating that it would continue to rely on the SED review processes to address these concerns. The Commission also restated its authority to "at any time implement appropriate regulatory tools to ensure electric utility safety and compliance with the PSPS guidelines, including but not limited to those presented in Commission Resolution 4846." PFM Decision at pp. 6-7. In pursuing the PFM, CforAT both provided and elicited additional information for the record on SCE's de-energization performance, as Joint Local Governments (City of Moorpark and Kern County) and TURN provided responses in support of the PFM, describing, respectively, the impacts to local communities from SCE's ongoing issues and the inadequacy of recent fines imposed on SCE. Joint Local Governments Response, filed July 31, 2025, at pp. 1-6; TURN Response, filed July 31, 2025, at pp. 1-3, cited in PFM Decision at p. 4. Through these efforts, CforAT enriched the record and the Commission's deliberation.	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
notification failures during the early events of the 2025 wildfire season, demonstrating SCE's continuing lack of successful remediation, and arguing that these ongoing concerns further demonstrate the need for enforcement action against SCE. Reply at pp. 2-7. In addition, the Reply responded to comments submitted by Joint Local Governments and TURN in support of the PFM, emphasizing the need for decisive enforcement action that prevents further harms to customers and communities and effectively deters SCE's noncompliance. Reply at pp. 7-9. CforAT filed Comments on the PD denying the PFM on October 15, 2025. The Comments on the PD urged the Commission to reconsider its pending denial of the PFM, emphasizing the ongoing serious de-energization issues with SCE and the need for enforcement action beyond SED review processes. Comments on PD at pp. 1-14. In the PFM, Reply, and Comments on PD, CforAT consistently raised the need for the Commission to take immediate action against SCE, beyond the SED review processes. See PFM at pp. 56-57 (emphasizing the need	Specifically, CforAT enhanced the record with our unique perspective on SCE's de-energization issues and their impact on our constituents. While the Commission did not revise the PFM Decision in response to CforAT's Comments on the PD, it nevertheless explicitly considered CforAT's comments in reaching a final decision. PFM Decision at pp. 7-8 ("CforAT timely filed comments . . . The Commission has considered the party comments and no changes have been made to the proposed decision"). CforAT was the sole party to provide comments on the PD and enriched the record by highlighting the urgent concerns of customers and communities affected by SCE's severe de-energization issues and identifying the PD's error in relying on a finding that SED review processes are sufficient. As discussed above, the Commission has in fact determined that action beyond staff review processes is necessary to address SCE's issues, despite its denial of CforAT's PFM. President Reynolds' Letter at pp. 1-3. While declining to pursue enforcement action against SCE via the vehicle requested by CforAT, the Commission has made clear through President Reynolds' Letter that immediate action beyond the ongoing SED review processes is necessary to address serious concerns with SCE's de-energization program. President Reynolds' Letter reflects the arguments and issues that CforAT	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
for immediate enforcement action against SCE beyond the SED review processes to achieve prompt improvements); Reply at pp. 8-9 (emphasizing need for immediate enforcement action); Comments on PD at pp. 8-10 (urging the Commission to take immediate enforcement action against SCE). Throughout this process, CforAT provided analysis and raised concerns about SCE's de-energization performance focused on the same time period identified in President Reynolds' Letter. <i>See</i> PFM at pp. 18-37 (detailing SCE's worsening performance in 2024 and catastrophic January 2025 events as grounds for modifying D.24-12-005); Reply at pp. 2-7 (providing an update on SCE's ongoing failures in 2025); Comments on PD at pp. 1-3 (describing SCE's worsening performance in 2024-2025). Points raised in CforAT's PFM, Reply, and Comments on the PD are further reflected in President Reynolds' Letter: • <i>See, e.g.</i>, PFM at pp. 56-57 (arguing that serious concerns in 2024-2025 warrant enforcement action).	has raised in the PFM, Reply, and Comments on the PD and in particular focuses on SCE's de-energization activity in the prior 18 months, including SCE's worsening performance during the 2024 season and the catastrophic January 2025 events, which were the new facts forming the basis for CforAT's PFM. Consistent with CforAT's arguments raised in the PFM, Reply, and Comments on the PD, President Reynolds' Letter emphasizes the following issues in its determination that action is needed to improve SCE's de-energization program: • "[O]ver the last 18 months SCE's execution of its PSPS Program has raised significant concerns;" • "I emphasize PSPS events should only be initiated as a last resort—when the benefits of de-energization outweigh other public safety risks;" • Utility action to mitigate harms is vital, "especially timely and effective notifications;" • SCE's action raise serious concerns regarding scope and duration of events as well as its notification processes; • "In 2024, SCE initiated 20 PSPS events, which represents the largest number of PSPS events ever initiated by SCE in a single year, and is notably higher than	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
• <i>See, e.g.</i>, PFM at p. 24 (raising concerns about shutoffs in the absence of threshold weather conditions); Comments on PD at p. 4 (“While these extensive shutoffs increased the chaos on the ground, they do not appear to have succeeded in their fundamental purpose of preventing utility facilities from igniting fires”). • <i>See, e.g.</i>, PFM at pp. 4-5 (emphasizing the importance of “accurate and timely notifications”). • <i>See, e.g.</i>, PFM at pp. 18-37 (documenting SCE’s worsening de-energization performance in its extremely active 2024 season, including widespread and severe notification failures). • <i>See, e.g.</i>, PFM at p. 19 (“SCE continues to outpaces the other IOUs not only in its overall level of de-energization activity, but also with its widespread and severe notification failures”), pp. 21 (emphasizing SCE’s much worse forecasting issues than the other IOUs). • <i>See, e.g.</i>, PFM at pp. 28-33 (highlighting failures during SCE’s large-scale,	the 14 total combined PSPS events initiated by all other electric utilities last year;” • Concerns particularly focus on the historic and large-scale PSPS events in January 2025; • The need for SCE to identify lessons learned and improve its performance; and • The complaints and “mounting public concern regarding SCE’s PSPS program.” President Reynolds’ Letter concludes by stating: • “I expect SCE to demonstrate how it plans to create measurable improvements in the extent, scope, and duration of its PSPS events, as well as in the timeliness, accuracy, and effectiveness of its notifications” and further notes the impacts of notification issues to SCE’s public safety partners and their ability to respond. President Reynolds’ Letter at pp. 1-3.	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
back-to-back January 2025 events). • <i>See, e.g.</i>, PFM at pp. 37-49 (emphasizing need for meaningful action plan and SCE's failure to provide one or demonstrate improvement). • <i>See, e.g.</i>, PFM at pp. 31, 34-36, 42 (detailing complaints and stakeholder concerns). • <i>See, e.g.</i>, PFM at pp. 37-47 (describing the need for information regarding remediations and a timeline and SCE's failure to provide this). • <i>See, e.g.</i>, PFM at p. 27 ("the <i>local</i> public safety partners are responsible for protecting people when the power is out, and their ability to do this effectively depends on the receipt of timely, understandable information from their utility").		
5. Advocacy: In addition to formal filings, CforAT engaged in other advocacy efforts, including sending ex parte letters and participating in ex parte meetings to bring the urgent issues regarding SCE's	CforAT's various advocacy efforts have contributed to our ongoing efforts to elevate our urgent concerns regarding SCE's de-energization performance to the attention of the Commission. These efforts have informed the Commission's	Noted. See, Part III.D CPUC Comments, Disallowances, and Adjustments.

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
de-energization activity to the attention of the Commission. On December 11, 2024, CforAT sent an ex parte letter to President Reynolds regarding D.24-12-005 which closed the R.18-12-005 proceeding. This letter was simultaneously submitted to the R.18-12-005 service list. In the ex parte letter, CforAT explained our concerns about closing the open forum for stakeholder input and reiterated our ongoing concerns with SCE's pattern of failures. CforAT highlighted the severe health and safety risks to our constituency of customers with medical needs and disabilities and focused in particular on the size and frequency of SCE's events and its rampant notification problems. Ex Parte Letter at pp. 1-8. CforAT submitted a second Ex Parte Letter regarding our pending Application for Rehearing (Rehearing Letter) to the Commissioners and CPUC leadership on January 27, 2025, and served this letter on the R.18-12-005 service list. The Rehearing Letter expressed CforAT's ongoing concerns regarding SCE's de-energization performance, particularly in light of the disastrous January 2025 events, and requested that the	consideration of these issues and required the Commission to devote attention to these issues. While the Commission has not yet pursued enforcement action via an OSC or other formal avenue as recommended by CforAT, the Commission has nevertheless decided to pursue enforcement activity outside of the proceeding as articulated in President Reynolds' letter, which closely echoes CforAT's well-established talking points on SCE's de-energization issues and is consistent with CforAT's overall recommendations for the Commission to require more information and improved performance from SCE. Consistent with the concerns highlighted in CforAT's ex parte letters, President Reynolds' Letter focuses on concerns regarding the scope, duration, and notification processes of SCE's de-energization events. The Letter echoes CforAT's regular emphasis on the importance of timely and effective notifications and the particular impacts on individuals with medical needs who rely on electricity for health and safety. President Reynolds' Letter at pp. 1-2. Consistent with CforAT's statement that SCE's urgent 2024 season issues cannot await staff review (Ex Parte Letter at p. 6), President Reynolds' Letter institutes immediate biweekly meetings with SCE to promptly improve the utility's de-energization performance. President Reynolds' Letter at p. 2.	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
Commission consider these ongoing events as context when evaluating CforAT's Application for Rehearing. The Rehearing Letter also further highlighted SCE's pattern of reporting issues, frequent and substantial reliance on de-energization exceeding that of the other IOUs, and ongoing and severe notification failures to both customers and public safety partners. Rehearing Letter at pp. 4-8. On January 13, 2025, CforAT met with CPUC Chief Deputy Executive Director Forest Kaser regarding our concerns with SCE's ongoing de-energization issues and the lack of a transparent forum for oversight of the utilities' de-energization program. When CforAT learned of President Reynolds' Letter to SCE (which was posted on the Commission website but not served on the service list for this proceeding), CforAT coordinated with counsel for Kern County and City of Moorpark to arrange an ex parte meeting in coalition with local government representatives with President Reynolds' advisor, Drew Hodel, on December 5, 2025. Together, CforAT and the local government	Also consistent with the issues raised in the Rehearing Letter, President Reynolds' Letter identifies concerns with SCE's reporting, scope and duration of de-energizations relative to the other IOUs, and issues with its notifications to customers and public safety personnel. President Reynolds' Letter at pp. 1-3. By engaging in appropriate meetings and advocating enforcement measures against SCE for its consistently poor de-energization performance, CforAT has emphasized these ongoing issues for the Commission's consideration. In conjunction with the local government officials, CforAT advocated for transparent enforcement that allows for stakeholder input and contributed information regarding de-energization impacts that will be shared with President Reynolds and inform Commission consideration of SCE's de-energization program. As stated in President Reynolds' letter, concerns raised by stakeholders have "highlight[ed] the mounting public concern regarding SCE's PSPS" and motivated the Commission to institute biweekly meetings with SCE and further articulate its expectations for improvement. President Reynolds' Letter at p. 2.	

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
representatives shared concerns about the disconnect between the Commission's official stance on SCE's de-energization in denying CforAT's requests for an OSC, while behind-closed-doors pursuing enforcement without input from stakeholders. The local government officials shared examples of the impacts to their communities during SCE's de-energization events, including costs to arrange generators and stand up a resource center as well as loss of food and medication for community members. CforAT explained the substantial risks of shutoffs to our constituents and the importance of local governments receiving adequate support to serve the needs of the most vulnerable individuals. CforAT and local governments requested that the Commission pursue enforcement against SCE in a transparent manner that allows input from stakeholders. In addition to the verbal advocacy, CforAT provided a detailed handout, including a timeline of CforAT's filings, the Commission's recent actions, and SCE's numerous recent de-energization events; this handout was compiled along with stories of de-energization impacts from the local governments.		

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: CforAT's efforts to bring SCE's ongoing de-energization issues to the attention of the Commission have been supported by City of Moorpark, Kern County, Acton Town Council, and TURN.		Noted
d. Intervenor's claim of non-duplication: While other parties have supported CforAT's efforts, CforAT has been the primary party initiating efforts to advance oversight and enforcement to correct the ongoing failures demonstrated by SCE's de-energization program. CforAT has remained focused on the impact of the de-energization program on our constituency of utility customers with disabilities and medical needs, who are at heightened risk of harm when they lose access to electricity (including devices that support their health and safety as well as their ability to live independently). This focus has informed all of CforAT's input and provided a unique perspective for the Commission to consider in its oversight of the utilities' de-energization program.		Noted

PART III: REASONABLENESS OF REQUESTED COMPENSATION**A. General Claim of Reasonableness (§ 1801 and § 1806):**

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: The importance of the issues that CforAT has repeatedly brought to the Commission's attention is extremely high for all customers impacted by SCE's de-energization events, and even greater for CforAT's constituency of customers with disabilities and medical needs. Through our efforts in this proceeding, CforAT has continued to work diligently to ensure that the Commission appropriately	After the adjustments made to this claim, the remainder of the claimed costs are reasonable. <i>See, Part III.D.</i>

	CPUC Discussion
considers the impacts of SCE's deficient de-energization performance, which most urgently affect vulnerable/AFN customers, who face immediate health and safety risks when they lose power and who may have limited resources to take action on their own. While it remains difficult to assign a dollar value to the impact of CforAT's advocacy on de-energization issues, AFN customers will benefit from CforAT's efforts to highlight the urgent and ongoing issues with SCE's de-energization program to the Commission and to advocate for enforcement and efforts to improve to SCE's de-energization program. AFN customers, in particular, and all customers will benefit from efforts to improve the SCE's compliance with the required guidelines, including timely notifications and outreach and mitigation efforts when the utility activates for a de-energization event. In light of the ongoing importance of issues surrounding de-energization to customers with disabilities and other AFN households, CforAT's request for compensation for our efforts to continue to enhance the record and support efforts to reduce the harms from SCE's shutoff events is reasonable.	
b. Reasonableness of hours claimed: CforAT's efforts were efficient and reasonable, particularly considering the importance of the issues under consideration and the ongoing impacts of SCE's power shutoffs on our constituency of utility customers and medical needs, as well as the limited activity of other consumer advocates at this stage in this proceeding. CforAT's efforts were substantially reduced relative to our previously-compensated work, because we ceased conducting detailed reviews and preparing detailed comments on each IOU event report when the proceeding was closed, though we appropriately provided a review of the 2024-2025 events in conjunction with the PFM. In seeking ongoing oversight of SCE, CforAT's work continued to be led by Legal Director Melissa W. Kasnitz, who has been working on issues surrounding de-energization since the option was first proposed by SDG&E following the San Diego wildfires of 2007, which at the time were the most destructive wildfires in California history. Ms. Kasnitz's substantial experience in addressing issues of the risks and harms of de-energization, as well as the need for targeted, support,	After the adjustments made to this claim, the remainder of the claimed hours are reasonable. <i>See</i>, Part III.D.

	CPUC Discussion
notification and mitigation for CforAT’s constituency, has been key to CforAT’s advocacy throughout this proceeding. CforAT’s junior staff attorney, Rachel Sweetnam, who bills at a substantially lower rate than Ms. Kasnitz, took the laboring oar in analyzing the ongoing failures reported by SCE and preparing initial drafts of virtually all filings. Ms. Kasnitz appropriately supervised and reviewed this work, ensuring that the delegation of effort was appropriate and efficient. Where both Ms. Kasnitz and Ms. Sweetnam attended meetings and calls, it was necessary due to Ms. Kasnitz’s role in overseeing strategic efforts to support enforcement of the Commission’s requirements and Ms. Sweetnam’s deep knowledge of the details of SCE’s events and reports.	
c. Allocation of hours by issue: 2024 Hours – Kasnitz (3.1 hours total): Advocacy: 2.9 hours (94%) The issue area “Advocacy” includes all time spent on efforts outside of formal filings to advocate for Commission oversight of the utilities’ de-energization programs, with a primary focus on SCE’s ongoing problems. Tasks included drafting ex parte letters, coordinating with other stakeholders, and participating in ex parte meetings at the Commission. Rehearing: 0.2 hours (6%) The issue area “Rehearing” includes all time spent addressing CforAT’s Application for Rehearing of D.24-12-005. 2024 Hours – Sweetnam (12.5 hours total): Advocacy: 10.0 hours (80%) Rehearing: 2.5 (20%) 2025 Hours – Kasnitz (38.7 hours total) Advocacy: 6.3 hours (16%) AEO: 3.3 hours (9%) The issue area “AEO” includes all time spent pertaining to the AEO adopted in Resolution M-4876 for SCE’s 2022 and 2023 seasons,	Noted; totals 100%.

	CPUC Discussion
including reviewing the Draft Resolution and AEO and drafting comments on Draft Resolution M-4876. General Participation: 0.4 hours (approx. 1%) The issue area “General Participation” includes time spent monitoring activity by other parties and/or the Commission in order to effectively participate in the ongoing activity regarding de-energization. PFM 20.1 hours (52%) The issue area “PFM” includes all time spent related to the Petition for Modification of D.24-12-005, including drafting, revising, reviewing filings and data, reviewing responses, writing a reply, and submitting comments on the PD. It also includes time spent reviewing and analyzing SCE’s various reports prepared for the 2024-2025 wildfire season, as the new data in support of the PFM. Rehearing: 8.6 hours (22%) 2025 Hours – Sweetnam (184.9 total) Advocacy: 20.1 hours (11%) AEO: 9.1 hours (5%) General Participation: 6.8 hours (4%) PFM: 131.5 hours (71%) Rehearing 17.4 hours (9%)	

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	2024	3.1	\$735.00	D.24-10-028	\$2,278.50	2.9 [1]	\$735.00 [4]	\$2,131.50
Melissa W. Kasnitz	2025	38.7	\$755.00	D.25-10-060	\$29,218.50	25 [1,2,3]	\$755.00 [4]	\$18,875.00
Rachel Sweetnam	2024	12.5	\$240.00	D.25-04-041	\$3,000.00	10 [1]	\$240.00 [5]	\$2,400.00

CLAIMED						CPUC AWARD		
Rachel Sweetnam	2025	184.9	\$275.00	D.25-10-050	\$50,847.50	146.3 [1,2]	\$275.00 [5]	\$40,232.50
Subtotal: \$85,344.50						Subtotal: \$63,639.00		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Melissa W. Kasnitz	2025	3.2	\$377.50	½ 2025 rate	\$1,208.00	3.20	\$377.50 [4]	\$1,208.00
Rachel Sweetnam	2025	15.9	\$137.50	½ 2025 rate	\$2,186.25	15.90	\$137.50 [5]	\$2,186.25
Subtotal: \$3,394.25						Subtotal: \$3,394.25		
TOTAL REQUEST: \$88,738.75						TOTAL AWARD: \$67,033.25		
*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 ³		Member Number		Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation			
Melissa W. Kasnitz	1992		162679		No			
Rachel Sweetnam	2023		350075		No			

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

Attachment or Comment #	Description/Comment
1	Certificate of Service

³ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

⁴ Attachments provided by CforAT are not included in this Decision.

Attachment or Comment #	Description/Comment
2	Detailed CforAT Time Records, including merits time and time on compensation
3	October 3, 2025 Letter from President John Reynolds to SCE
4	CforAT Ex Parte Letter
5	CforAT Letter re Pending Application for Rehearing
6	Final – Letter to SCE PSPS Program
7	R.18-12-005 De-Energization CforAT Comments on Resolution M-4876

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Lack of Substantial Contribution	Public Utilities Code §1802(j) states that a substantial contribution “has substantially assisted the commission in the making of its order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer.” In evaluating whether CforAT made a substantial contribution here, the Commission also evaluates whether the hours claimed by CforAT were commensurate with the contributions claimed by the intervenor. Making a substantial contribution in and of itself does not entitle an intervenor to all its claimed fees and costs. Compensation is granted for efficient, meaningful contributions. In D.25-07-028, the Commission awarded \$278,932.75 in intervenor compensation to CforAT for substantial contribution to, among other things, D.24-12-005, the decision closing R.18-12-005. In support of its request, CforAT stated that its contribution included arguing that the Commission should “revise the PD [the PD that resulted in D.24-12-005] to grant CforAT’s Motion for OSC [Order to Show Cause] and identified errors in the PD’s failure to designate an open proceeding to support ongoing stakeholder engagement with utility filings, including no clarity as to whether stakeholders would be authorized to file comments in the closed proceeding.” (See, CforAT February 6, 2025 Request for Intervenor Compensation, <i>citing to</i> CforAT Comments on PD filed November 20, 2024, at pp. 1-12.) In D.25-07-028, the Commission found that CforAT’s substantial contribution included arguing against closing the proceeding on multiple grounds. D.24-12-005 closed the proceeding.

Item	Reason
	CforAT seeks compensation here for presenting arguments substantially similar to the arguments it presented in its comments on the PD filed November 20, 2024. While the Commission acknowledges that CforAT met the procedural requirements for filing the underlying application for rehearing and correctly describes its participation in the rehearing phase of the proceeding, CforAT does not establish that it is reasonable to award compensation for this work for the reasons set forth below. CforAT presented arguments pertaining to D.25-04-019 that were substantially similar to its prior arguments related to D.24-12-005 and, as a result, it did not enhance the record relative to the rehearing. CforAT already received compensation in D.25-07-028 (July 24, 2025) for its contributions to D.24-12-005. As such, CforAT’s participation did not make a substantial contribution to the outcome in D.25-04-019. The record does not support the finding that CforAT made a substantial contribution to the subsequent decision in this proceeding, D.25-04-019. In addition, in denying CforAT’s rehearing request in D.25-04-019, the Commission found no legal error warranted rehearing and made no modifications to the underlying decision. While this outcome is not dispositive in terms of substantial contribution, it is one aspect of the Commission’s review of CforAT’s request for compensation that weighs against finding substantial contribution here. Accordingly, the Commission denies all hours related to CforAT’s work on the Application for Rehearing of D.24-12-005. The hours are reduced as follows: <u>2024</u> • Kasnitz: 0.2 hours • Sweetnam: 2.5 hours <u>2025</u> • Kasnitz: 10.4 hours • Sweetnam: 28.2 hours Regarding CforAT’s request for compensation for work related to its July 1, 2025 Petition for Modification of D.24-12-005, the Commission finds that CforAT did make a substantial contribution because CforAT’s participation did enhance the record. The Commission agrees that CforAT presented the Commission with new information to consider regarding CforAT’s request for the Commission to issue an Order to Show Cause against SCE. That information was related to the January 2025 fires in Southern California. CforAT stated, in its July 1, 2025 Petition at p. 57, in part: “In the intervening

Item	Reason
	time [since D.24-12-005], the events of January 2025 devastated customers and communities in Los Angeles, aggravated by the utility’s massive notification failures (and potential responsibility for some of the wildfires).” In D.25-10-038 at p. 4, the Commission describes CforAT’s new information, as follows: “The July 1, 2025 petition generally asserts that SCE’s performance has worsened since December 2024 when the Commission issued D.24-12-005 and that, according to CforAT, SCE has not presented any meaningful action plan for addressing its deficient performance. The petition further asserts that the Commission’s Safety and Enforcement Division’s compliance review processes are inadequate to address the concerns raised now and in CforAT’s August 6, 2024 motion. The Utility Reform Network and City of Moorpark and Kern County (jointly) timely filed responses in support of the July 1, 2025, petition. CforAT timely filed a reply to responses.” In addition, CforAT’s Petition for Modification met the standard of review for the Commission’s consideration of a petition for modification. The Commission in D.25-10-038 at pp. 5-6 considered this standard, as follows: “Regarding the standard of review, the Commission considers whether CforAT’s petition meets the substantive burden, pursuant to Rule 16.4, to demonstrate that the Commission should exercise its discretion to modify D.24-12-005.” Based on the Commission’s finding in D.25-10-038 that CforAT met the substantive threshold for the Commission’s consideration of its Petition for Modification under Rule 16.4 and that CforAT presented new information about SCE regarding the January 2025 fires in Southern California, the Commission finds that CforAT made a substantial contribution related to its work on its Petition for Modification resulting in D.25-10-038, and accordingly, grants compensation for this work. CforAT requests compensation for work performed on or about November 6, 2025 related to topics outside of the proceeding. Section 1801 et seq does not provide for intervenor compensation outside of a proceeding. According to Section 1802(g), “proceeding” means “an application, complaint, or investigation, rulemaking, alternative dispute resolution procedures in lieu of formal proceedings as may be sponsored or endorsed by the commission, or other formal proceeding before the commission.” To the extent this request for compensation rests on the Commission’s action outside of R.18-12-005, this request is denied.

Item	Reason
	Regarding the compensation for the preparation of this claim, the number of hours is reasonable and CforAT's requested hourly rate is reasonable based on the level of skill required for preparing this claim for intervenor compensation.
[2] Reduction due to failure to file timely request based on Section 1804(c)	Section 1804(c) sets forth the timeline for filing a request for intervenor compensation: "Following issuance of a final order or decision by the commission in the hearing or proceeding, a customer who, or eligible local government entity that, has been found, pursuant to subdivision (b), to be eligible for an award of compensation may file within 60 days a request for an award." In D.25-06-035, a rehearing decision, the Commission recently confirmed the denial of intervenor compensation based on the failure to file a timely request in accordance with Section 1804(c). Resolution M-4876 was issued on July 25, 2025. CforAT's request for intervenor compensation was filed on December 19, 2025, a filing date beyond the statutory timeline set forth in Section 1804(c). Therefore, because the request is not timely, no compensation is awarded to CforAT regarding Resolution M-4876. CforAT requests approximately 12 hours of work related to this Resolution, which is reduced accordingly: <u>2025</u> • Kasnitz: 3.3 hours • Sweetnam: 9.1 hours
[3] Melissa W. Kasnitz's 2025 Reductions	CforAT fails to demonstrate how the following activities contributed to the Commission's decision-making process. Intervenors bear the burden of proof to show that all claimed hours were spent efficiently and made a substantial contribution, as required under program guidelines. Accordingly, the below hours are reduced: • 11/6/2025: Review LA Times Article re: Commission communication w/ SCE separate from PFM on compliance; investigate same (0.5 hours) • 11/6/2025: Call w/ M. Somogyi (local gov'ts) and R. Sweetnam re: unreported commission activity on SCE's shutoff failures & appropriate response to same (0.3 hours) • 11/6/2025: Conf. w/ ED & R. Sweetnam re: response to Commission activity outside of formal proceeding regarding SCE failures (0.3 hours) • 11/6/2025: Email exchange with R. Sweetnam and M. Somogyi re: LA Times Article re: unreported Commission enforcement activity against SCE (0.2 hours)

Item	Reason
[4] Melissa W. Kasnitz's 2024 and 2025 Hourly Rates & Intervenor Compensation Rate	D.24-10-028 approved a 2024 hourly rate of \$735 for Kasnitz. D.25-10-060 approved a 2025 hourly rate of \$755 for Kasnitz. As Intervenor Compensation Claim Preparation hours are compensated at ½ preparer's normal hourly rate, we apply the rate of \$377.50 for Kasnitz.
[5] Rachel Sweetnam's 2024 and 2025 Hourly Rates & Intervenor Compensation Rate	D.25-04-041 approved a 2024 rate of \$240 for Sweetnam. D.25-10-060 approved a 2025 rate of \$275 for Sweetnam. As Intervenor Compensation Claim Preparation hours are compensated at ½ preparer's normal hourly rate, we apply the rate of \$137.50 for Sweetnam.

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. CforAT filed its request for intervenor compensation with respect to Resolution M-4876 on December 19, 2025 and the issuance date of Resolution M-4876 is July 25, 2025.
2. In D.25-07-028, the Commission awarded \$278,932.75 in intervenor compensation to CforAT for substantial contribution to, among other things, D.24-12-005, the decision closing this proceeding, R.18-12-005.
3. CforAT's Application for Rehearing presented arguments substantially similar to its arguments it previously presented regarding D.24-12-005.
4. CforAT's July 1, 2025 Petition for Modification presented new information about the January 2025 Southern California fires and met the Rule 16.4 threshold for Commission consideration of a petition for modification.

5. CforAT seeks compensation for work outside of the proceeding occurring on or about November 6, 2025.
6. The requested hourly rates for CforAT's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
7. The claimed costs and expenses, as adjusted and reduced herein, are reasonable and commensurate with the work performed.
8. The total of reasonable compensation is \$67,033.25.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.
2. Because CforAT's request for compensation is untimely under the 60-day timeframe set forth in Section 1804(c) regarding Resolution M-4876, compensation related to Resolution M-4876 is denied.
3. Because CforAT's Application for Rehearing presented substantially similar arguments that it previously presented and the Commission considered regarding D.24-12-005, CforAT did not make a substantial contribution to D.25-04-019, which denied CforAT's Application for Rehearing of D.24-12-005.
4. Because CforAT presented new information regarding the January 2025 Southern California fires and CforAT met the substantive threshold for the Commission's consideration of a petition for modification under Rule 16.4, CforAT made a substantial contribution to D.25-10-038, which denied CforAT's Petition for Modification of D.24-12-005.
5. CforAT's work outside of the proceeding occurring on or about November 6, 2025 does not qualify for compensation under the statute.

ORDER

1. Center for Accessible Technology is awarded \$67,033.25.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Liberty Utilities (CalPeco Electric), Bear Valley Electric Service, a division of Golden State Water Company, and Pacific Power, a division of PacifiCorp, shall pay Center for Accessible Technology their respective shares of the award, based on their California-jurisdictional gas and electric revenues for the 2025 calendar year, to reflect the year in which the

proceeding was primarily litigated. If such data are unavailable, the most recent gas and electric revenue data shall be used. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning March 4, 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 17, 2026, at San Marcos, 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:	D2609070	Modifies Decision?	No
Contribution Decision(s):	D2510038		
Proceeding(s):	R1812005		
Author:	ALJ DeAngelis, ALJ Kao		
Payer(s):	Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Liberty Utilities (CalPeco Electric), Bear Valley Electric Service, a division of Golden State Water Company, and Pacific Power, a division of PacifiCorp		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/ Disallowance
Center for Accessible Technology	December 19, 2025	\$88,738.75	\$67,033.25	N/A	See Part III.D CPUC Comments, Disallowances, and Adjustments above.

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Melissa	Kasnitz	Attorney	\$735	2024	\$735.00
Melissa	Kasnitz	Attorney	\$755	2025	\$755.00
Rachel	Sweetnam	Attorney	\$240	2024	\$240.00
Rachel	Sweetnam	Attorney	\$275	2025	\$275.00

(END OF APPENDIX)