Decision 26-09-071 September 17, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Gas Company (U904G) for Authority, Among Other Things, to Update its Gas Revenue Requirement and Base Rates Effective on January 1, 2024.	Application 22-05-015 (Filed May 16, 2022)
And Related Matter.	Application 22-05-016

DECISION GRANTING COMPENSATION TO CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE FOR SUBSTANTIAL CONTRIBUTION TO DECISION 24-12-074

Intervenor: California Environmental Justice Alliance	**For contribution to Decision (D.) 24-12-074**
Claimed: $572,474.50	**Awarded:** $560,706.00
Assigned Commissioner: Darcie L. Houck	**Assigned ALJ:** John Larsen and Minh LeQuang[1]

PART I: PROCEDURAL ISSUES

A. Brief description of Decision[2]:	Decision Addressing the 2024 Test Year General Rate Cases of Southern California Gas Company and San Diego Gas & Electric Company

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

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	July 27, 2022	Verified

[1] Administrative Law Judge (ALJ) Minh LeQuang was co-assigned with ALJ John Larsen to consolidated Application (A.) 22-05 015 and A.22-05-016 on March 9, 2026.

[2] Description of the Decision was not provided by the intervenor. A brief description was added.

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

2. Other specified date for NOI:		
3. Date NOI filed:	August 23, 2022	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:	R.19-11-009, A.22-05-015, A.22-05-016	A.22-05-015, A.22-05-016
6. Date of ALJ ruling:	March 13, 2020 (R.19-11-009) and February 23, 2023 (A.22-05-015/016)	February 23, 2023[4]
7. Based on another CPUC determination (specify):	D.25-01-051, Box 8	Noted
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
Showing of "significant financial hardship" (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	R.19-11-009, A.22-05-015, A.22-05-016	A.22-05-015, A.22-05-016
10. Date of ALJ ruling:	March 13, 2020 (R.19-11-009) and February 23, 2023 (A.22-05-015/016)	February 23, 2023[5] June 29, 2026[6]
11. Based on another CPUC determination (specify):	D.25-01-051, Box 12	Noted
12. Has the Intervenor demonstrated significant financial hardship?		Yes

[4] The February 23, 2023, ALJ Ruling in this proceeding stated that CEJA's NOI "has demonstrated the party's status as a 'customer'" and that CEJA was "preliminarily determined to be eligible for claiming intervenor compensation in this proceeding." ALJ Ruling at 13, 15.

[5] The February 23, 2023, ALJ Ruling in this proceeding stated that CEJA "has made a preliminary demonstration of significant financial hardship . . . subject to providing additional information in an intervenor compensation claim filed in this proceeding." ALJ Ruling at 13.

[6] Eligibility was finalized on June 29, 2026, following CEJA's submission of supplemental financial information required by the February 23, 2023 NOI ruling.

Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.24-12-074	Verified
14. Date of issuance of Final Order or Decision:	December 23, 2024	Verified
15. File date of compensation request:	February 20, 2025	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
	The February 23, 2023 ALJ Ruling in this Proceeding responding to CEJA's NOI required CEJA to provide additional financial information in its intervenor compensation claim. CEJA is filing that information concurrent with this claim in the form of a Response with a Motion to File Under Seal, as it contains sensitive financial information about CEJA and its member organizations.	On June 29th, 2026, California Environmental Justice Alliance met the eligibility requirements to claim intervenor compensation in this proceeding based on the record established in the Amended NOI.

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. Costs of Political Activities and Outside Legal Costs Improper for Ratepayer Recovery California Environmental Justice Alliance ("CEJA") provided legal, factual, and policy analysis in its testimony and briefs that substantially contributed to the denial of costs for Southern California Gas Company ("SoCalGas")		Noted, CEJA's advocacy led to the removal and denial of millions of dollars in shareholder-related legal and political costs from ratepayer recovery and prompted new Commission reporting requirements for outside legal

and San Diego Gas & Electric Company's ("SDG&E") political activities, lobbying, membership dues to trade associations that conduct political activities and lobbying on their members' behalf, and outside legal costs for litigation to protect shareholders' interests. With regard to outside legal costs, CEJA investigated through discovery SoCalGas' requests for outside counsel costs that advanced shareholder interests, rather than ratepayer interests. In response to CEJA's questions, SoCalGas first removed over one million dollars of expenses from its forecast that were paid to the law firm Reichman Jorgensen, reclassifying the expenses to shareholder accounts and claiming that the discovery questions had led SoCalGas to identify "one or more errors" in its Outside Counsel cost allocations. After CEJA pressed further, including successfully litigating a Motion to Compel, the utilities "discovered" additional "errors," in both SoCalGas and SDG&E's booking of Outside Counsel costs, resulting in a downward adjustment of Outside Counsel costs by $4.308 million across both companies. In addition to the costs that the Sempra Utilities removed from their forecast, the Commission also denied an additional $2.377 million worth of outside legal	**<u>Outside Counsel</u>** CEJA, Motion to Compel Southern California Gas Company and San Diego Gas & Electric Company to Provide Information Requested in Questions 4 and 5 in California Environmental Justice Alliance Ninth Set of Data Requests (Feb. 1, 2023). CEJA, Reply to Response in Opposition of Southern California Gas Company and San Diego Gas & Electric Company to California Environmental Justice Alliance Motion to Compel, at **6–7** (Mar. 3, 2023). Administrative Law Judge's Ruling Granting California Environmental Justice Alliance's Motion to Compel (Apr. 11, 2023). The Commission agreed that CEJA's discovery requests did not seek attorney-client communications and that "[a] response to CEJA's data request is necessary for the Commission to determine the reasonableness of SoCalGas's allocation of the expenses to ratepayer accounts." Prepared Testimony of Matthew Vespa, Sara Gersen, Sasan Saadat, and Rebecca Barker on Behalf of the California Environmental Justice Alliance on the Test Year 2024 General Rate Case Applications of Southern California Gas Company and San Diego Gas & Electric ("CEJA Testimony"), at **98–99** (Mar. 27, 2023). Opening Brief of California Environmental Justice Alliance ("CEJA Opening Brief"), at **94–104** (Aug. 14, 2023). Motion of California Environmental	expenses.

expenses due to CEJA's recommendations and development of the record to demonstrate these costs benefited shareholders, not ratepayers, and were unrecoverable. Further, the Commission instituted new reporting requirements for both SoCalGas and SDG&E as a result of CEJA's advocacy regarding outside counsel expenses and record-building regarding SoCalGas' lack of transparency and repeated booking of inappropriate outside legal costs to ratepayer accounts.	Justice Alliance for Official Notice (Aug. 30, 2023) (admitting evidence related to the litigation whose costs were at issue). Reply Brief of California Environmental Justice Alliance ("CEJA Reply Brief") at **36–39** (Sept. 7, 2023). D.24-12-074 at **708–11** (detailing the evidence that CEJA provided regarding inappropriate outside legal expenses), **723–24** (finding, in agreement with CEJA and Cal Advocates, that "SoCalGas's pattern of misclassification of costs in the past requires corrective measures and future reporting requirements"), **724** ("CEJA and Cal Advocates make compelling arguments that ratepayers should not bear outside legal expenses incurred for the CEC litigation, for the response to an inquiry from the California Attorney General's office, and for the litigation against Cal Advocates' investigation of SoCalGas's lobbying and advocacy work."), **725–26** ("We agree with CEJA that the lawsuit may have been used to influence the CEC's decisions . . . Therefore, these litigation costs should not be included in forecasts for future cost recovery from ratepayers because these outside legal expenses were used to influence decision-makers, which is a below-the-line expense under FERC Account 426.4."); **727** (denying SoCalGas' request for costs defending a California AG inquiry for the same reasons CEJA explained in briefing); **727** (finding that litigation against Cal Advocates' investigation "protected shareholders' lobbying and advocacy interests," citing CEJA's brief for support); **729** ("We accept CEJA's recommendation to remove these litigation costs from SoCalGas's outside counsel cost	

Additionally, the Commission disallowed costs for SoCalGas' Business Strategy and Energy Policy department because of evidence that CEJA obtained through discovery and analysis that CEJA conducted. CEJA demonstrated that a significant portion of the department's activity was administrative lobbying that was inappropriate for ratepayer recovery, including advocacy promoting the increased use of gas. The Commission expressly agrees with and relies upon CEJA's analysis and recommendation for BSEP Labor Costs in the Decision. Further, the Commission adopted some of CEJA's recommendations that the Commission take additional action to impose express prohibitions on certain activity as well as new reporting requirements for political activity. In its argument regarding SoCalGas' BSEP requests, CEJA specifically suggested reporting requirements that would include detailed information and breakdowns of employees' labor costs by matter for	forecast."); **729–31** (instituting new reporting requirements to address the utilities' failure to appropriately book outside legal expenses). D.24-12-074 FOFs #359, 360, 362; COLs #234, 235, 236, 238; OP #53. **<u>SoCalGas BSEP</u>** CEJA's testimony set forth the evidence and analysis underpinning its position that approximately 60% of the volume of comments filed by this department in 2021 did not benefit ratepayers and instead promoted the interests of Sempra shareholders, which was the basis for CEJA's recommended reduction of $1.993 million from SoCalGas' BSEP request. CEJA Testimony at **121–129**. CEJA presented additional legal analysis in briefing and rebutted SoCalGas' arguments regarding BSEP costs. CEJA Opening Brief at **115–126**. CEJA Reply Brief at **43–46.** CEJA also advocated in briefing for the Commission to take additional steps to ensure SoCalGas does not book the costs of political activities to ratepayer accounts, such as the activities CEJA identified that were conducted by the BSEP teams. CEJA Opening Brief at **126–128.** The Commission agreed with CEJA and adopted CEJA's recommendation regarding BSEP labor costs. D.24-12-074 at **786–787** ("CEJA is reasonable in raising concerns about SoCalGas leveraging its Energy Policy team to encourage state agencies to adopt policies promoting the use of	Verified

employees whose time the utility seeks ratepayer funding for and whose work supported engagement with CARB, the CEC, air quality management districts, or other government bodies. CEJA also supported Cal Advocates' recommended reductions to account for political activities, and request for additional reporting requirements.	methane and hydrogen fuels and oppose measures that favor electric options. We disagree with SoCalGas's claim that CEJA's interpretation and application of FERC Account 426.4 is incorrect . . . CEJA demonstrates that SoCalGas's Energy Policy team actively promotes policies to increase gas consumption."); **787** ("CEJA shows that in sectors that are not directly related to natural gas service, SoCalGas is trending toward including O&M costs in developing and implementing policies affecting natural gas . . . by engaging with proceedings at other state agencies, such as CARB, the CEC, and the South Coast Air Quality Management District. We agree with CEJA that it is unclear where SoCalGas draws the line between 'educating policymakers' and legislative lobbying, and whether the work done by these employees . . . supports lobbying activities."); **788** ("It is reasonable that CEJA used the 2021 comment letters as a proxy for the portion of overall historic [BSEP] costs that it recommends should not be recovered from ratepayers because this is the only clearly documented portion of the work . . . Adopting CEJA's proposed labor cost reduction is justified[.]"). D.24-12-074 FOF #384, 385, COL #267. The Commission also adopted new reporting requirements related to political activities that SoCalGas must comply with on an annual basis, as recommended by CEJA and Cal Advocates. D.24-12-074 at **881–883** (describing annual reporting requirements); FOF #362, 421, 428; COL #299, 300, 303; OP #56, 57.	Verified

	See also CEJA Opening Comments on PD at **15–18** (recommending additional clarifications to the reporting requirements), **22–23** (highlighting the need for stricter Commission oversight and sanctions due to SoCalGas' pattern and practice of misclassifying political costs into ratepayer accounts); CEJA Reply Comments on PD at **4–5** (explaining that the Commission's proposed reporting requirements on outside legal and political activities do not violate attorney-client privilege or the First Amendment, as claimed by the Sempra Utilities).	
CEJA also successfully advocated against the Sempra Utilities' recovery of membership dues to trade associations that conduct lobbying and political activities, where the utilities failed to demonstrate a factual basis for the percentage of dues they charged to shareholders, rather than ratepayers, for such activity. The Commission agreed with CEJA's analysis and rejected the utilities' request to recover dues for the Hydrogen Council, American Gas Association, and Edison Electric Institute as a result. The Commission also adopted CEJA's recommended requirement that SoCalGas	<u>**Trade Association Dues**</u> CEJA Testimony at **29–30** (recommending that the Commission reject recovery for Hydrogen Council dues and explaining what the Hydrogen Council is); **100–114** (regarding American Gas Association ("AGA") dues for both utilities); **115–120** (regarding Edison Electric Institute ("EEI") dues for SDG&E). CEJA Opening Brief at **32–33** (explaining why Hydrogen Council dues should be disallowed); **106–114** (explaining why AGA and EEI dues should be disallowed). CEJA Reply Brief at **40–43** (rebutting the Utilities' legal arguments regarding trade association dues). D.24-12-074 at **313** ("Regarding dues paid to the Hydrogen Council via ratepayer funds, we agree with CEJA and find that ratepayers should not fund	Verified

provide a list of all membership dues recovered from ratepayers and the relevant FERC accounts. CEJA's advocacy was informed by extensive fact-finding through discovery, cross-examination of utility witnesses, and legal analysis, which the Commission relied upon in making its findings.	the work undertaken by the Hydrogen Council."); **313** ("We also find merit in CEJA's recommendation to require SoCalGas to justify these various membership contributions to the Commission because they are not evident in the direct testimony, rebuttal testimony, or workpapers. Therefore, in the next GRC application, SoCalGas shall provide a list of all membership dues recovered via ratepayer and the related FERC accounts."); **758–759** (disallowing both utilities' AGA dues for the reasons that CEJA suggested in its testimony and briefing); **770–771** (disallowing EEI dues for the reasons that CEJA and TURN suggested in testimony and briefing); FOF #104, 373, 374, 381, 382; COL#94, 252, 261.	
CEJA also opposed recovery of SoCalGas' costs for the Customer Service – Information cost category that related to promotional advertising, including promoting the use of hydrogen. This cost category was ultimately settled, but CEJA contributed to the record regarding these costs, which were ultimately determined in a multi-issue settlement that CEJA opposed.	**<u>CSIN</u>** CEJA Testimony at **4**. CEJA Opening Brief at **63–66**. CEJA Reply Brief at **25–26**. California Environmental Justice Alliance Comments on Joint Motion of Southern California Gas Company (U 904-G), San Diego Gas & Electric Company (U 902-M), The Utility Reform Network, Public Advocates Office, and the Small Business Utility	Verified

	Advocates for Adoption of Settlement Agreement, at **1–5** (Nov. 27, 2023). D.24-12-074 at **919–924** (discussing CSIN settlement, CEJA and EDF's objections, and ultimately adopting settlement).	
2. Excessive or Unsupported Gas Infrastructure Expenditures CEJA substantially contributed to the record and outcomes of this GRC with regard to excessive or unsupported gas infrastructure expenditures by ensuring that the Sempra Utilities properly implemented the Commission's elimination of gas line extension allowances so that ratepayers, not shareholders, would receive the resulting savings. The Commission ended gas line extension allowances ("LEAs") in D.22-09-026, several months after the Sempra Utilities filed their GRC Application. To ensure that the Utilities were properly accounting for ratepayer savings that would flow from that policy change, CEJA engaged in significant fact-finding efforts through discovery and cross-examination of the Utilities' witnesses. Because of CEJA's advocacy, the Utilities updated	<u>**New Business Forecast and Accounting for LEA Elimination**</u> CEJA Testimony at **14–17** (demonstrating that SoCalGas' New Business forecast fails to account for the elimination of LEAs), **18–20** (same for SDG&E's New Business forecast) CEJA Opening Brief at **19–22** (explaining why SoCalGas and SDG&E's requests failed to account for D.22-09-026 and ensure ratepayers would receive savings, not shareholders). CEJA Reply Brief at **6–7** (highlighting Sempra's lack of rebuttal regarding failure to ensure ratepayers receive savings from elimination of LEAs). CEJA Opening Comments on PD at **3–7, 9–10.** D.24-12-074 at **85–88** (discussion and findings on the issue of integrating LEA elimination into forecasts, including restatement of CEJA's argument and statement that "We find merit in CEJA's argument to adjust the New Business cost forecasts (non-collectible) for the 2024 Test Year by 63 percent for SoCalGas and 71 percent for SDG&E	Verified

their forecasts to account for ratepayers' savings, but did not properly update their requests in the Results of Operations ("RO") Model to accurately reflect the precipitous drop in non-collectible New Business forecasts. CEJA's advocacy throughout the proceeding, including its comments on the Proposed Decision, illuminated this issue and allowed for the Commission to correct it in its final Decision. Further, in Comments on the PD, CEJA's suggested methods for calculating appropriate amounts synthesized CEJA's findings regarding the Utilities' failure to properly implement the LEA decision with the Commission's proposed approach, which had been previously suggested by TURN to correct for past overestimations of new customer counts. The Commission ultimately adopted the synthesized forecast method, taking into account both TURN's and CEJA's suggestions.	since that is based on each utility's assessment and data request response on the impact of line extension allowances."). D.24-12-074 FOF #14(a), 14(b), 20(d), 20(e), 20(aa) COL#15(a), 15(b)	
Relatedly, CEJA built a record in this proceeding demonstrating that other costs, such as Pressure Betterment and SDG&E's Gas System Reinforcement and Line Purging costs, would be entirely eliminated as the elimination of gas line extension allowances is fully implemented over the next few	**<u>Pressure Betterment/Gas System Reinforcement/SDG&E Line Purging</u>** CEJA Testimony at **17–18** (demonstrating that SoCalGas' Pressure Betterment requests were unsupported), **20** (same for SDG&E Gas System Reinforcement, which is a different name for the same cost category as Pressure Betterment).	Verified

years. CEJA successfully advocated for the Commission to reject these forecasted costs.	CEJA Opening Brief at **22–25** (explaining why line purging, Pressure Betterment, and Gas System Reinforcement costs were unsupported and should be rejected). CEJA Reply Brief at **8** (recommending rejecting line purging costs), **8–9** (rebutting Sempra arguments regarding Pressure Betterment/Gas System Reinforcement costs). CEJA Opening Comments on PD at **8–9** (regarding line purging costs), **10–12** (regarding Gas System Reinforcement costs). D.24-12-074 at **87** ("We agree with CEJA's recommendation to adjust purging costs . . ."); **108** (reciting CEJA's recommendations regarding Pressure Betterment costs and stating: "The Commission agrees that SoCalGas's forecast for pressure betterment projects is unreliable and unsupported . . . the Commission does not find any forecast for any additional pressure betterment work to be reasonable and adopts a forecast of zero for this cost category."); **163–164** (reciting CEJA's recommendation to reject SDG&E's Gas System Reinforcement request and stating: "Consistent with these reasons, the Commission finds that SDG&E has not demonstrated how any pressure betterment work is needed . . . [and] does not find any forecast for any SDG&E additional pressure betterment work to be reasonable and adopts a forecast of zero for this cost category."). D.24-12-074 FOF #14(c), 14(d); COL #15(d), 15(e), 19(d), 19(bb)	

Additionally, CEJA advocated for the Commission to account for the elimination of line extension allowances in the Post-Test Year Mechanism by reducing New Business costs by 50% and creating a one-way balancing account to refund any overcollection to ratepayers. While the Commission did not adopt CEJA's recommended 50% reduction in PTY New Business Costs, it did adopt the measure of a one-way balancing account, as recommended by CEJA and TURN, and CEJA's contributed substantially to record-building regarding the need to properly account for steep PTY declines in the New Business cost category due to the elimination of LEAs.	**PTY Mechanism and One-Way Balancing Account** CEJA Testimony at **16–17** (discussing inadequacy of PTY Mechanism to reflect ratepayer savings stemming from LEA elimination). CEJA Opening Brief at **20–22** (discussing issues with PTY Mechanism for accurately reflecting savings from LEA elimination and recommending cutting 2024 forecast by 50% to normalize costs over the PTY period, as well as recommending a one-way balancing account). CEJA Reply Brief at **6** (advocating for 50% reduction in TY 2024 to normalize costs over the PTY period and recommending establishing a one-way balancing account to refund ratepayers any overcollections). CEJA Opening Comments on PD at **7–8.** D.24-12-074 at **88** ("[W]e adopt the one-way balancing account as recommended by CEJA and TURN to ensure that if ratepayers ultimately pay more than estimated for line-extension allowances, they should be refunded."). D.24-12-057 FOF #; COL #15(c), 19(g), OP #10(h).	Verified
3. Sustainability Activities, Including Hydrogen and Biomethane Infrastructure, Research, and Vehicle Expenditures CEJA substantially contributed to the record on hydrogen and		Verified

biomethane issues in this GRC, providing evidence from targeted discovery and its own expert testimony, as well as legal analysis regarding discrete categories of spending on hydrogen and biomethane technologies within the Utilities' real estate and infrastructure requests, research and development requests, and vehicle-related activities. The Commission agreed with CEJA in many instances and rejected the Utilities' requests for recovery of these activities' costs, as broken down further below. CEJA has attempted to delineate between discrete issues within this issue area for easier review, but notes that many issues overlap between hydrogen and biomethane production, blending, and use cases, including vehicle acquisitions and refueling stations.		
CEJA opposed the Sempra Utilities' requests for recovery of costs related to hydrogen research, including hydrogen blending research and projects, explaining that the requests were inappropriate in light of the ongoing, pending Application before the Commission for hydrogen blending pilot projects, as well as the potential for hydrogen blending projects to undermine	<u>**Hydrogen Blending Activities**</u> CEJA Testimony at **41, 42, 43, 47–49**. CEJA Opening Brief at **28, 41–42, 47–48, 52, 90–91**. CEJA Reply Brief at **9.** CEJA Reply Comments on Proposed Decision at **2–4**. D.24-12-074 at **6**, **202–203** (noting CEJA and other intervenors' arguments against Gas Engineering hydrogen blending costs, agreeing that "state	

the Commission's electrification efforts and the state's climate goals. The Commission found, consistent with CEJA's advocacy, that these costs were inappropriate for recovery, duplicative of efforts outside the GRC, and unsubstantiated.	policy to combat climate is more complex than SoCalGas claims" and that "this funding could also be duplicative of costs requested in the hydrogen blending pilot application," and rejecting numerous hydrogen-related requests as a result), **931** (explaining that "the utilities' hydrogen proposals are largely ineligible for cost recovery due to the lack of clear benefits to gas service ratepayers"). D.24-12-074 FOF #20(z); COL #19(aa), 44, 101, 112,	
CEJA advocated for denial of over $50 million of costs in SoCalGas and SDG&E's Clean Energy Innovations ("CEI") departments. CEJA developed the record through discovery and detailed testimony to identify costs within each utility's CEI request that did not benefit ratepayers, including costs related to new lines of business and the promotion of hydrogen or biomethane. The Commission agreed with CEJA on several subsets of CEI costs. Overall, CEJA contributed to the Commission's decision to reduce SoCalGas and SDG&E's CEI requests by approximately $14 million and $7 million, respectively.	**<u>Clean Energy Innovations</u>** CEJA Testimony at **20–44** (regarding SoCalGas' CEI requests, including its CEI subprograms, CEI Project Management, and Research, Development, and Demonstration ("RD&D") requests); **45–58** (regarding SDG&E's CEI requests, including Hydrogen Strategy and Implementation, Innovation Technology Development, and Hydrogen Build Ready Infrastructure Program). CEJA Opening Brief at **4** (summarizing recommended reductions of SoCalGas and SDG&E CEI requests); **26–49** (regarding each subsection of SoCalGas' CEI request); **50–58** (regarding SDG&E's CEI request). CEJA Reply Brief at **10–19** (regarding SoCalGas' CEI requests); **20–23** (regarding SDG&E's CEI requests). D.24-12-074 at **303–304** (regarding the Sustainability subprogram of CEI, stating: "CEJA has made a valid point that SoCalGas has not identified any ASPIRE 2045-related projects. We	Verified

	agree with CEJA that ratepayers should not bear the burden if costs are not associated with specific tasks and projects that benefit ratepayers," and going on to reject SoCalGas' request for incremental cost increases for this category for reasons aligned with CEJA's argument and where CEJA was the only party opposing SoCalGas' request); **310–312** (denying incremental labor and non-labor cost increases for Business Development subprogram of Clean Fuels CEI subprogram for reasons aligned with CEJA's arguments and specifically citing CEJA exhibits, because "we agree with CEJA and TURN-SCGC that SoCalGas's existing gas customers should not bear the cost of stimulating demand for the company's potential future carbon capture and hydrogen delivery business"), **312-13** ("We concur with CEJA that the purpose of these consultant contracts was to provide studies and analysis to influence the decisions of public officials on matter that would impacts SoCalGas's future business and capital investment strategy in businesses other than gas services . . . Undertaking the consultant work and research, as highlighted by CEJA, at ratepayer expense is not justified . . . These contracts are non-operational expenses that should not be booked to ratepayer accounts," and accordingly, rejecting $2.923 million in consulting costs); **323** (summarizing both CEJA and TURN-SCGC's arguments against establishment of a CEI-centric program management office and denying all incremental costs [see FOF #109 for explicit citation of CEJA's argument]); **325–329** (identifying CEJA's arguments regarding SoCalGas' RD&D request, "agree[ing] with the intervenors," including CEJA, that "transparency and	

	accountability are critical" and thus the annual review process should not be made less stringent, and reducing the RD&D budget by more than any party other than CEJA requested); **336** (denying $5 million in O&M costs for a subprogram of SDG&E's CEI department, stating: "We agree with CEJA that SDG&E's proposal for this newly created RD&D program, the Innovation Technology Development Program, should be denied."); **337** (requiring SDG&E not to make electric RD&D proposals in its GRC on bases argued by CEJA, finding "CEJA has reasonably argued that SDG&E's Innovation Technology Development Program is a new RD&D program akin to the EPIC program but without the same level of Commission oversight."); **341** (denying incremental costs for Hydrogen Strategy and Implementation Department subprogram of SDG&E CEI and stating: "We agree with CEJA and Cal Advocates that SDG&E has not provided supporting evidence to justify the incremental labor and non-labor costs for the newly created Hydrogen Strategy and Implementation Department"); **341** ("We also agree with CEJA that it is not justified and reasonable for ratepayers to fund research studies that duplicate CEC's findings on evaluating hydrogen's potential to decarbonize California's energy grid"); **369** ("We agree with Cal Advocates, CEJA, UCAN and EDF that the Hydrogen Build-Ready Infrastructure project proposed by SDG&E should not be funded through ratepayer funds in this GRC cycle). D.24-12-074, FOF# 101–103, 107, 109, 112, 114, 116, 129; COL # 92–93, 95–99, 100–101, 112.	

CEJA opposed SDG&E's request for funds for the Palomar Hydrogen System in testimony, briefing, and in opposing a related settlement. The Commission denied the hydrogen component of the Palomar-related requests in SDG&E's Electric Generation cost category.	**<u>Palomar Hydrogen System</u>** CEJA Testimony at **61, 88–92**. CEJA Opening Brief at **58–62**. CEJA Reply Brief at **23–25**. California Environmental Justice Alliance Comments on Joint Motion of Southern California Gas Company (U 904-G), San Diego Gas & Electric Company (U 902-M), and the Public Advocates Office for Adoption of Settlement Agreements Resolving Various Issues in the 2024 General Rate Case, at **7–10 (**Nov. 27, 2023). D.24-12-074 at **386–387** (acknowledging CEJA's argument), **394** ("We have decided to deny SDG&E's request to build a hydrogen fueling station . . . We agree with Cal Advocates and CEJA that SDG&E can fuel its vehicles at public stations[.]"), **403–406** (noting CEJA's position and denying Palomar Hydrogen System), **926** (denying portion of settlement agreement related to Palomar Hydrogen Systems). D.24-12-074 FOF #145 (noting that intervenors', including CEJA's "recommendation to deny [SDG&E's] capital expenditures request for the Palomar Hydrogen System is reasonable").	Verified
CEJA dedicated specific attention to SoCalGas'	**<u>Hydrogen Home</u>** CEJA Testimony at **6, 22, 93–98**.	Verified

multimillion dollar Hydrogen Home project, and uniquely developed the record on facets of this issue through discovery and cross-examination, revealing evasive accounting treatment by SoCalGas for this project's costs. In particular, CEJA provided analysis regarding a) the inconsistency between the Hydrogen Home and California's climate policies, b) the inappropriateness of recovery for a project that is promotional in nature, and c) SoCalGas' practice, as evidenced by its accounting treatment of the Hydrogen Home, of re-allocating funds from prior GRCs without seeking approval for the project and without reporting having done so. The Commission agreed with CEJA and denied recovery of all costs associated with the Hydrogen Home.	CEJA Opening Brief at **5**, **15** (explaining how CEJA investigated project costs of the Hydrogen Home through discovery, revealing inconsistent statements about the total costs and whether they would be shareholder or ratepayer funds), **32** (explaining how Clean Fuels Infrastructure Development funds were used to promote the hydrogen home), **65** (explaining how CSIN funds were used to promote the hydrogen home), **87–93** (explaining in-depth why the hydrogen home's costs should not be recoverable from ratepayers, detailing SoCalGas' evasive accounting treatment and inconsistent statements regarding costs and who would pay them, and explaining why SoCalGas should be sanctioned for its lack of candor regarding this project). CEJA Reply Brief at **18**, **26**, **35–36**. CEJA Opening Comments on PD at **21–22** (explaining why PD should be revised to sanction SoCalGas for its lack of candor regarding the Hydrogen Home). D.24-12-074 at **603–604** (summarizing CEJA's position and laying out facts demonstrated by CEJA's discovery and cross-examination of SoCalGas witnesses regarding the Hydrogen Home and SoCalGas' failure to properly and transparently account for its costs), **611–615** (denying recovery for the Hydrogen Home project on grounds advocated for by CEJA, including specifically citing CEJA's factual analysis about energy usage onsite and stating that "[w]e agree with CEJA that any cost borne by ratepayers for hydrogen blending projects should be covered by pilots under Commission oversight and	

	through a transparent process," finding it "unclear why SoCalGas . . . decided to divert millions of dollars at its discretion without Commission knowledge and authorization," an issue for which CEJA provided extensive factual record development and legal analysis.); **937–938** (explaining in response to PD comments why the Hydrogen Home's funding was denied). D.24-12-074 FOF #278–281; COL #194.	
CEJA advocated against ratepayer-funded investments in hydrogen and methane vehicles and their related infrastructure (*i.e.*, refueling stations), research, and O&M costs, as these investments undermine California's transportation electrification goals, and directly defied prior Commission direction to the Utilities. The Commission agreed and rejected numerous requests from both utilities for recovery of costs related to these types of vehicles and their related infrastructure, maintenance costs, and research.	**Vehicles** CEJA Testimony at **33–35** (regarding Clean Fuels Transportation Program and hydrogen-powered and methane-burning vehicles' inconsistency with California policy), **42** (opposing RD&D costs related to light-duty hydrogen fuel cell vehicles and hydrogen fueling stations), **58–90** (providing in-depth factual record development and analysis regarding hydrogen-powered and methane-burning vehicles, why their adoption and related costs are inappropriate for ratepayer recovery, inconsistent with California's climate goals, and violate prior Commission rulings). CEJA Opening Brief at **26** (recommending disallowance of $2.2 million for hydrogen refueling station at Honor Rancho storage facility); **34–37** (advocating for disallowance of labor costs in SoCalGas' Clean Fuels Infrastructure Development department related to promotion of methane and hydrogen vehicles); **44–46** (advocating for disallowance of SoCalGas' proposed spending on vehicles research); **66–76** (advocating against Fleet Services spending related to hydrogen and methane vehicles); **77–82** (advocating	Verified

	against recovery of costs for methane-burning vehicle refueling stations); **82–87** (advocating against recovery of costs for hydrogen vehicle refueling stations). CEJA Reply Brief at **16–17** (regarding Clean Fuels Transportation Program spending to promote hydrogen and methane vehicles); **27–30** (regarding Fleet Services requests related to hydrogen and methane vehicles); **30–32** (regarding methane-burning vehicle refueling stations); **32–25** (regarding hydrogen vehicle refueling stations). CEJA Opening Comments on PD at **12–13** (correcting PD's misstatement of CEJA's position and reiterating that $816,000 should be removed from SoCalGas' Fleet Management forecast to account for labor related to hydrogen vehicle maintenance, which was revised accordingly in the final Decision); **14–15** (advocating against hydrogen vehicle costs approved in the PD seemingly in error); **18–21** (requesting sanctions for SoCalGas' use of funds on methane-burning vehicle refueling stations in EJ communities that the PD denied but that were already constructed, and requesting penalty for SoCalGas' procurement of hydrogen vehicles against Commission direction, the costs of which the PD had rejected). D.24-12-074 at **394** (rejecting hydrogen vehicle refueling station at Palomar Energy Center, stating "[w]e agree with Cal Advocates and CEJA that SDG&E can fuel its vehicles at public stations"); **575** ("[W]e agree with TURN, Cal Advocates, and CEJA that SoCalGas's hydrogen vehicle procurement plan is not based on market maturity . . . Parties have sufficiently demonstrated that EVs have significantly lower operational and	

	lifetime costs than hydrogen-fueled light-duty vehicles."); **575** (adjusting SoCalGas' vehicle cost estimates downward by an average of CEJA, TURN, and Cal Advocates' recommended amounts); **601** (noting CEJA's recommendation that the Commission "deny SoCalGas's request for two RNG stations at Santa Maria and Visalia because they impact ESJ communities"), **618–622** (denying SoCalGas recovery for the Santa Maria and Visalia methane-burning vehicle refueling stations, stating that the Commission agrees with CEJA's legal analysis regarding the stations, including that they were prohibited under past Commission direction, agrees with CEJA and TURN that "ratepayers would bear all the risk of stranded costs," that "there is merit in CEJA's argument that new long-term investments in refueling stations for polluting vehicles go squarely against California policies," and that "we agree with CEJA and TURN and find that SoCalGas's proposal is inconsistent with the ESJ Action Plan."); **622–625** (denying SoCalGas' request for costs relating to hydrogen refueling stations at Pico Rivera and Honor Rancho, noting "we agree with CEJA that there is a legislative mandate to electrify the transportation sector, but no analogous hydrogen infrastructure mandates exist."). D.24-12-074, FOF #241, 251, 255, 286, 289, 290, 292, 293, COL #96, 97, 176, 177, OP #36.	
4. General This category includes time that CEJA's team spent on this matter that does not fit into the		Noted, CEJA's general category accounts for time that could not be attributed to a

substantive topic areas above, including, e.g., time on procedural or logistical discovery matters, time spent on responsive filings to other parties' motions outside of our core advocacy areas (e.g., TURN's Motion to Sever), etc.		specific substantive issue.

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	Yes
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Yes
c. If so, provide name of other parties: Cal Advocates, Environmental Defense Fund ("EDF"), The Utility Reform Network ("TURN")		Noted
d. Intervenor's claim of non-duplication: CEJA made efforts to coordinate with parties with similar positions to avoid duplication where our positions were aligned and to discern where our positions diverged. CEJA communicated with Cal Advocates, TURN, and EDF to avoid non-duplication where feasible. This coordination minimized time spent researching and analyzing issues and avoided duplication of efforts by multiple parties. CEJA uniquely contributed to the record in this proceeding both through its advocacy around issues that no other party engaged on and through its unique positions and engagement with particular elements of issues that were of concern to numerous parties. Many issues for which CEJA developed a factual record not provided by other parties, or where CEJA provided unique legal analysis, resulted in denial of costs by the Commission. For example, CEJA's persistent inquiry regarding SoCalGas' improperly booked outside legal expenses, including litigation of a successful Motion to Compel, resulted in SoCalGas' removal of substantial outside legal costs that it had misbooked to ratepayer accounts, and revealed additional expenses that the Commission ultimately denied. Similarly, it was CEJA's cross-examination of SoCalGas' witness regarding outside legal expenses that		Noted

revealed the witness could not answer reasonable questions about critical subject matter, prompting the presiding ALJ to require SoCalGas' General Counsel to appear and be cross-examined. CEJA also uniquely developed a process for review and analysis of SoCalGas' comments and letters to agencies, providing a factual basis for the Commission to determine what portion of this activity should be unrecoverable as lobbying. While other parties, such as Cal Advocates, engaged generally on the issue of SoCalGas' administrative lobbying and political activity, CEJA's contribution to the record was unique and specifically cited by the Commission in its final decision as the basis for its determination of what costs should be rejected. In addition, CEJA's discovery regarding the implementation of the Commission's Decision to eliminate gas line extension allowances prompted the Utilities to update their projections for collectible vs. non-collectible New Business expenses, and CEJA's comments on the Proposed Decision and advocacy around these cost categories resulted in tens of millions of savings for ratepayers. While other parties, such as TURN, engaged on New Business costs and Customer Forecasts, CEJA's advocacy was distinct and ultimately contributed to a synthesized approach that the Commission adopted in its final decision. CEJA also successfully advocated against recovery of costs for SoCalGas' Hydrogen Home project. While other parties, such as EDF, also opposed the hydrogen home generally, CEJA developed the record with data obtained through repeat, focused discovery revealing SoCalGas had improperly reallocated past GRC funds for the project without ever seeking authorization from the Commission for it as a demonstration project, that SoCalGas had provided evasive and inaccurate information regarding the total costs of the project, and that SoCalGas had improperly used ratepayer funds for advertising and promotional elements of the project. CEJA provided detailed testimony on this issue, highlighting the many ways in which it provided no ratepayer benefit.	

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
2023. **Intervenor's claim of cost reasonableness:** CEJA's costs are reasonable for full participation in a complex general rate case ("GRC") spanning two utilities and a broad range of subject matter.	Noted

	CPUC Discussion
CEJA performed in-depth analysis and record development regarding topics ranging from infrastructure expenditures and vehicle acquisitions to lobbying and litigation expenses. Indeed, as discussed above, in addition to CEJA's advocacy on issues of concern to numerous parties, CEJA's fact-finding and advocacy resulted in a robust record on a number of issues that could otherwise have flown under the radar in such a complex and extensive proceeding. Due to the complex nature and extensive record in a GRC, CEJA's costs are reasonable for the labor needed to engage meaningfully on a range of issues. CEJA's advocacy resulted in over $100 million in ratepayer savings, including over $35 million of reductions to SoCalGas' hydrogen and biomethane vehicle refueling station requests, $18 million of savings in pressure betterment costs for SoCalGas, approximately $16 million of savings for SoCalGas' fleet services costs, over $14 million in reductions to SoCalGas' Clean Energy Innovations request, over $7 million of reductions in SDG&E's Clean Energy Innovations request, over $7 million in current Hydrogen Home costs (plus preclusion of an additional nearly $8 million for future planned Hydrogen Home costs), and over $4 million of reductions in Outside Legal costs and combined trade association dues amounts across both utilities, among other categories. CEJA's advocacy regarding the implementation of the Commission's elimination of LEAs resulted in reductions of over $10 million for SoCalGas and over $1.5 million for SDG&E even beyond the Utilities' initial recalculations—counting CEJA's persistent advocacy to get the Utilities to recalculate their New Business forecasts in light of the LEA decision, and adjust them accordingly, savings were over $46 million for SoCalGas and over $7 million for SDG&E compared to the initial requests the Utilities presented in their Application. These monetary benefits are in addition to non-quantifiable ratepayer benefits that will flow from the increased accountability provisions of the Decisions regarding political and outside legal expenses. In the context of these contributions, CEJA's requested costs are reasonable.	
b. Reasonableness of hours claimed: CEJA participated in all major steps leading to this Decision, including extensive discovery,[7] litigation of a discovery dispute, testimony,[8] cross-	Noted. *See* Part III.D CPUC Comments, Disallowances, and Adjustments below.

[7] CEJA issued 32 data requests to the Sempra Utilities in this proceeding and responded to three data requests from the Sempra Utilities. CEJA also reviewed the data requests and responses provided by the Sempra Utilities for other parties to avoid duplication of data requests on common issues.

[8] CEJA's combined expert testimony was 129 pages long, not including attachments, with 622 footnotes.

	CPUC Discussion
examination of several utility witnesses, briefing,[9] and comments on the Proposed Decision. Through its filings, CEJA provided detailed legal and substantive analysis to support D.24-12-074's findings. The number of hours claimed is reasonable based on the number of filings and the complexity of the issues. Additionally, CEJA has reduced the total hours requested in this compensation claim by only including a single attorney's time in meetings where multiple attorneys attended. CEJA also reduced attorney hours during the evidentiary hearing by removing time attorneys spent watching the hearings other than time they were required to be signed in due to cross-examination on the schedule that day. Further, CEJA has removed all time spent at the outset of the proceeding related to the Ventura Compressor Station project and its removal from the scope of this GRC, as the Commission directed in its ruling on financial hardship in response to CEJA's NOI.	
c. Allocation of hours by issue: 1. Costs of Political Activities and Outside Legal Costs Improper for Ratepayer Recovery – 29.7% 2. Excessive or Unsupported Gas Infrastructure Expenditures – 12.6% 3. Sustainability Activities, Including Hydrogen and Biomethane Infrastructure, Research, and Vehicle Expenditures – 47.6% 4. General – 10.0%	Noted, totals 99.9%

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Matt Vespa	2022	88.6	$515	See Comment 1	$45,629.00	85.80 [7]	$515 [1]	$44,187.00
Matt Vespa	2023	466.5	$540	See Comment 1	$251,910.00	453.40 [7]	$540 [1]	$244,836.00
Matt Vespa	2024	27.3	$560	See Comment 1	$15,288.00	26.6 [7]	$560 [1]	$14,896.00

[9] CEJA's Opening Brief was 132 pages long with 650 footnotes, and its Reply Brief was 48 pages, with 243 footnotes.

CLAIMED						**CPUC AWARD**		
Rebecca Barker	2022	11.6	$235	See Comment 2	$2,726.00	11.6	$235 [2]	$2,726.00
Rebecca Barker	2023	162.6	$245	See Comment 2	$39,837.00	159.6 [8]	$245 [2]	$39,102.00
Rebecca Barker	2024	53.0	$255	See Comment 2	$13,515.00	52.3 [8]	$255 [2]	$13,336.50
Sara Gersen	2022	30.7	$415	See Comment 3	$12,740.50	30.4 [9]	$415 [3]	$12,616.00
Sara Gersen	2023	325.9	$435	See Comment 3	$141,766.50	322.40 [9]	$435 [3]	$140,244.00
Maya DeGasperi	2022	4.0	$125	See Comment 4	$500.00	3.00 [10]	$125 [4]	$375.00
Maya DeGasperi	2023	155.2	$130	See Comment 4	$20,176.00	155.2	$130 [4]	$20,176.00
Maya DeGasperi	2024	14.5	$135	See Comment 4	$1,957.50	14.5	$135 [4]	$1,957.50
Angelica Navarro	2023	116.5	$120	See Comment 5	$13,980.00	116.5	$120 [5]	$13,980.00
Sasan Saadat	2022	9.9	$195	See Comment 6	$1,930.50	9.9	$195 [6]	$1,930.50
Sasan Saadat	2023	28.5	$205	See Comment 6	$5,842.50	28.5	$200 [6]	$5,700.00
					Subtotal: $567,798.50			***Subtotal:* $556,062.50**
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Matt Vespa	2025	3.1	$292.50	½ of projected 2025 rate	$906.75	3.1	$292.50 [1]	$906.75
Rebecca Barker	2025	13.2	$132.50	½ of projected 2025 rate	$1,749	13.2	$132.50 [2]	$1,749.00
Sara Gersen	2025	6.5	$237.50	½ of projected 2025 rate	$1,543.75	6.5	$232.50 [3]	$1,511.25

CLAIMED						CPUC AWARD		
Maya DeGasperi	2025	5.6	$70	½ of requested 2025 rate	$392	5.6	$70 [4]	$392.00
Angelica Navarro	2025	1.3	$65	½ of requested 2025 rate	$84.5	1.3	$65 [5]	$84.50
					Subtotal: $4,676			***Subtotal: $4,643.50***
					TOTAL REQUEST: $572,474.50			***TOTAL AWARD: $560,706.00***

*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate

ATTORNEY INFORMATION

Attorney	Date Admitted to CA BAR[10]	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Matt Vespa	12/6/2002	222265	No
Rebecca Barker	6/23/2020	331672	No
Sara Gersen	8/31/2011	277563	No

C. Attachments Documenting Specific Claim and Comments on Part III[11]:

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Timesheet for Matt Vespa
Attachment 3	Timesheet for Rebecca Barker
Attachment 4	Timesheet for Sara Gersen
Attachment 5	Timesheet for Maya DeGasperi

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

[11] Attachments not included in the final Decision.

Attachment or Comment #	Description/Comment
Attachment 6	Timesheet for Angelica Navarro
Attachment 7	Timesheet for Sasan Saadat
Attachment 8	Resume of Maya DeGasperi
Comment 1	2022, 2023, 2024, and 2025 Rates for Matthew Vespa CEJA requests the following rates for Matthew Vespa for work performed in each year: 2022 – $515 (approved in D.24-03-063) 2023 – $540 (approved in D.24-05-019) 2024 – $560 (approved in D.24-05-019) 2025 – $585 (This rate is projected using the 2024 escalation rate of 4.07% and only appears in this claim as the basis for determining Mr. Vespa's appropriate rate for work to prepare the intervenor compensation claim, at 50% of the 2025 rate). The Commission approved a rate of $560 per hour for Mr. Vespa for work performed in 2024 in D.24-05-019 (see Commission Comment 2, applying escalation rate), and has approved the 2022 and 2023 rates listed above. For the purposes of assigning a rate to 2025 work on this claim, CEJA applied an estimated escalation factor of 4.07%, then rounded to the nearest $5 increment, to propose a 2025 rate of $585. For intervenor compensation claim labor in 2025, CEJA requests ½ of the 2025 rate. Mr. Vespa is a 2002 graduate of the University of California, Berkeley School of Law ("Berkeley Law") with a certification in environmental law and has practiced environmental and energy law for the past twenty years. Over the past ten years, Mr. Vespa has appeared before the Commission across a range of energy-related dockets. Mr. Vespa currently teaches Renewable Energy Law & Policy at Berkeley Law.
Comment 2	2022, 2023, 2024, and 2025 Rates for Rebecca Barker CEJA requests the following rates for Rebecca Barker for work performed in each year: 2022 - $235 (approved in D.24-01-017) 2023 - $245 (approved in D.24-01-017) 2024 - $255 (approved in D.24-05-019) 2025 - $265 (This rate is projected and only appears in this claim as the basis for determining Ms. Barker's appropriate rate for work to prepare the intervenor compensation claim, at 50% of the 2025 rate).

<table>
<tr><th>Attachment or Comment #</th><th>Description/Comment</th></tr>
<tr><td></td><td>The Commission approved a rate of $255 per hour for Ms. Barker for work performed in 2024 in D.24-05-019 (see Commission Comment 2, applying escalation rate), and has approved the 2022 and 2023 rates listed above. For the purposes of assigning a rate to 2025 work on this claim, CEJA applied an estimated escalation factor of 4.07%, then rounded to the nearest $5 increment, to propose a 2025 rate of $265. For intervenor compensation claim labor in 2025, CEJA requests ½ of the 2025 rate.

Ms. Barker is an attorney with five years of experience practicing environmental and energy law. She received her J.D. from the University of Chicago Law School in 2019 and was admitted to the California Bar in 2020. As a Senior Associate Attorney in Earthjustice's Clean Energy Program, Ms. Barker represents clients in public utility commission ("PUC") proceedings in California and other states (she is also licensed in Illinois). This representation includes drafting legal documents, developing legal strategy, working with experts, and appearing in Commission proceedings on behalf of clients.</td></tr>
<tr><td>Comment 3</td><td><u>2022, 2023, and 2025 Rates for Sara Gersen</u>
CEJA requests the following rates for Sara Gersen for work performed in each year:

2022 - $415 (approved in D.23-08-044)
2023 - $435 (approved in D.23-08-044)
2025 - $475 (calculated here)

The Commission approved a rate of $435 per hour for Ms. Gersen for work performed in 2023 in D.23-08-044, and has also approved the 2022 rate listed above.

For intervenor compensation claim labor in 2025, CEJA requests ½ of the 2025 rate. To calculate an estimated base rate for 2025 for Ms. Gersen, CEJA first applied the 2024 escalation rate of 4.07% to the approved 2023 rate for Ms. Gersen to get a rate of $455 for 2024. Then, CEJA used the 2024 escalation rate, as the 2025 escalation rate is not yet available. Applying the 4.07% escalation rate to the 2024 rate of $455 and rounding to the nearest $5 increment results in a 2025 rate of $475.

Ms. Gersen is an attorney who graduated from the University of California, Berkeley, School of Law in 2010 with a certificate of specialization in environmental law. Ms. Gersen has practiced environmental and administrative law for her entire legal career and has specialized in issues related to the regulation of utilities since 2014. Ms. Gersen practices</td></tr>
</table>

Attachment or Comment #	Description/Comment
	primarily before the state utility regulatory commissions in California, Nevada, and New Mexico.
Comment 4	<u>2022, 2023, 2024, and 2025 Rates for Maya DeGasperi</u> Maya DeGasperi is a Senior Litigation Assistant for the Clean Energy Program at Earthjustice. CEJA requests that the Commission adopt the following first-time hourly rates for Ms. DeGasperi: 2022 – $125 2023 – $130 ($125 x 4.46% escalation rate, rounded to nearest $5 increment) 2024 – $135 ($130 x 4.07% escalation rate, rounded to nearest $5 increment) 2025 – $140 ($135 x 4.07% escalation rate, which is the most recent published at the time of this claim, rounded to nearest $5 increment). The 2025 rate is projected solely for the purpose of adopting a ½ value rate for time spent preparing the intervenor compensation claim in 2025. These rates are calculated by applying the Commission's adopted escalation rates for each year based on a requested first-time 2022 rate of $125. The 2022 rate is appropriate for Ms. DeGasperi within the Paralegal – II (2-5 years) range of the Commission's Hourly Rate Lookup tool, as she had over two years of paralegal experience in 2022 when she began working on this proceeding. Ms. DeGasperi graduated from Macalester College in 2020 with a B.A. in Environmental Studies with an emphasis on Environmental Justice and a minor in Geography. Since 2020, Ms. DeGasperi has performed legal assistant and paralegal duties supporting litigation teams. She has served in her current role in the Clean Energy Program at Earthjustice since 2021, where she has developed specific expertise regarding Public Utilities Commission litigation in numerous states, including substantial experience working on California Public Utilities Commission proceedings. Ms. DeGasperi performs a wide range of paralegal duties, including reviewing and interpreting factual and technical information, assisting with case management throughout the litigation process, proofreading and cite checking filings, managing and reviewing discovery, assembling exhibits and assisting with hearings, providing internal guidance regarding venue rules, training and mentoring new litigation assistants, and conducting case-related research and case development investigations. Ms. DeGasperi has conducted these duties since she began working at Earthjustice and has increased her expertise with each year of experience.

Attachment or Comment #	Description/Comment
	Adopting a $125 rate for 2022 and increasing it using the escalation rates calculated above will appropriately also place Ms. DeGasperi's 2025 requested rate of $140 within the range of Paralegal – III (5-10 years), as she now has five years of paralegal experience. Ms. DeGasperi's resume is attached as Attachment 8.
Comment 5	2023, 2024, and 2025 Rates for Angelica Navarro CEJA requests the following rate for Ms. Navarro for work performed in 2023: 2023 - $120 The Commission adopted a rate of $115 for Ms. Navarro for work performed in 2022 (*see* D.24-03-038). CEJA calculated the 2023 rate for Ms. Navarro by applying the 4.46% escalation rate for 2023 to the approved 2022 rate as follows: $115 x 1.0446 = $120.13, rounded to the nearest $5 increment = **$120** To calculate a 2025 rate for the purposes of compensating Ms. Navarro's time spent preparing the intervenor compensation claim, CEJA performed the following calculations: 2024 escalation: $120 x 1.0407 = $124.90, rounded to the nearest $5 increment = **$125** illustrative rate for work performed in 2024 (none in this claim) 2025 escalation: $125 x 1.0407 = $130.09, rounded to the nearest $5 increment = **$130** for work performed in 2025 (only used in this claim for purposes of intervenor compensation claim preparation time). As explained in justifying her previously-adopted rate, Ms. Navarro is a Litigation Assistant for the Clean Energy Program at Earthjustice. She graduated from Scripps College in 2022 and interned in a range of legal and government office settings prior to joining Earthjustice. In her current role, Ms. Navarro has continued to focus on supporting legal advocacy before energy regulatory commissions, including the CPUC. She performs a wide range of paralegal duties, including proofreading, cite checking, and substantively reviewing briefs, comments, and other filings, as well as managing and reviewing discovery processes and documents in large, complex matters like this GRC.
Comment 6	2022 and 2023 Rates for Sasan Saadat CEJA requests the following rates for Mr. Saadat for work performed in 2022 and 2023:

Attachment or Comment #	Description/Comment
	2022 - $195 (approved in D.23-08-044) 2023 - $205 CEJA calculated the 2023 rate for Mr. Saadat by applying the 4.46% escalation rate for 2023 to the approved 2022 rate as follows: $195 x 1.0446 = $203.70, rounded to the nearest $5 increment = $205. Between 2022 and 2023, Mr. Saadat continued to gain experience as a Senior Research and Policy Analyst at Earthjustice, specializing in California climate and energy policy matters with a specific focus on vehicle and building decarbonization. As explained in justifying his previously-adopted rate, Mr. Saadat graduated in 2017 with honors from University of California Berkeley's College of Natural Resources with a degree in Society and Environment, and prior to his work at Earthjustice, worked for the City of Foster City developing the City's Climate Action Plan and initiating new sustainability initiatives related to EV charging and bike share. At Earthjustice, Mr. Saadat worked on a variety of California climate policy matters, and co-authored a report of a white paper on hydrogen policy issues.

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Matt Vespa 2022, 2023, 2024 Hourly Rate & 2025 Intervenor Compensation Rate	Upon further review, the Commission has determined that Vespa is an employee of Earthjustice and serves as a consultant to CEJA. The Commission requested supplemental documentation be submitted by CEJA to confirm the rates charged by Vespa. CEJA has confirmed that per the terms of their contract, Vespa has been hired on a contingency rate basis, meaning the consultant has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on Vespa's experience. Given the 2022 Legal – Attorney – V rate range is $506.38 to $719.10 with a median of $626.38, we find the requested 2022 hourly rate of $515 to be reasonable and we apply it here. Given the 2023 Legal – Attorney – V rate range is $534.32 to $747.04 with a median of $654.32, we find a 2023 of $540 to be reasonable and we apply it here.

Item	Reason
	Given the 2024 Legal – Attorney – V rate range is $560.95 to $773.67 with a median of $680.95, we find a rate of $560 to be reasonable and we apply it here. Given the 2025 Legal – Attorney – V rate range of $584.51 to $797.23 with a median of $704.51, we find a rate of $585 to be reasonable and we apply it here. We apply ½ of Vespa's 2025 rate of $585 for an intervenor compensation claim preparation rate of $292.50. The award made herein for the consultant's contribution shall be passed through in full to the consultant, and no portion of this part of the award shall be kept by the intervenor. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission's policy on consultant compensation, and the understanding that the consultant has not billed or collected compensation for the work performed until final award is given. We reiterate that it is the responsibility of the intervenor to provide the appropriate documentation with the initial claim to ensure efficient processing, and thus avoid the need for the Commission to request supplemental documentation. In this instance, CEJA did not provide all the documentation pertaining to the contract terms between CEJA and Vespa in the initial claim and waited until the Commission requested supplemental documentation which delays the processing of the claim.
[2] Rebeca Barker 2022, 2023, 2024 Hourly Rate & 2025 Intervenor Compensation Rate	Upon further review, the Commission has determined that Barker is an employee of Earthjustice and serves as a consultant to CEJA. The Commission requested supplemental documentation be submitted by CEJA to confirm the rates charged by Barker. CEJA has confirmed that per the terms of their contract, Barker has been hired on a contingency rate basis, meaning the consultant has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on Barker's experience. Given the 2022 Legal – Attorney – II rate range is $225.20 to $414.36 with a median of $316.1, we find the 2022 hourly rate of $235 to be reasonable and we apply it here. Given the 2023 Legal – Attorney – II rate range is $239.30 to $428.46 with a median of $330.22, we find the 2023 hourly rate of $245 to be reasonable and we apply it here.

Item	Reason
	Given the 2024 Legal – Attorney – II rate range is $252.74 to $441.90 with a median of $343.66, we find the 2024 hourly rate of $255 to be reasonable and we apply it here. Given the 2025 Legal – Attorney – II rate range of $264.63 to $453.79 with a median of $355.55, we find the 2025 hourly rate of $265 to be reasonable and we apply it here. We apply ½ of Barker's 2025 rate of $265 for an intervenor compensation claim preparation rate of $132.50. The award made herein for the consultant's contribution shall be passed through in full to the consultant, and no portion of this part of the award shall be kept by the intervenor. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission's policy on consultant compensation, and the understanding that the consultant has not billed or collected compensation for the work performed until the final award is given. We reiterate that it is the responsibility of the intervenor to provide the appropriate documentation with the initial claim to ensure efficient processing, and thus avoid the need for the Commission to request supplemental documentation. In this instance, CEJA did not provide all the documentation pertaining to the contract terms between CEJA and Barker in the initial claim and waited until the Commission requested supplemental documentation which delays the processing of the claim.
[3] Sara Gersen 2022, 2023 Hourly Rate & 2025 Intervenor Compensation Rate	Upon further review, the Commission has determined that Gersen is an employee of Earthjustice and serves as a consultant to CEJA. The Commission requested supplemental documentation be submitted by CEJA to confirm the rates charged by Gersen. CEJA has confirmed that per the terms of their contract, Gersen has been hired on a contingency rate basis, meaning the consultant has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on Gersen's experience. Given the 2022 Legal – Attorney – IV rate range is $298.27 to $635.75 with a median of $513.61, we find the 2022 hourly rate of $415 to be reasonable and we apply it here. Given the 2023 Legal – Attorney – IV rate range is $421.18 to $658.66, with a median of $536.52, we find the 2023 hourly rate of $435 to be reasonable and we apply it here. Given the 2025 Legal – Attorney – IV rate range is $462.33 to $699.81, with a median of $577.67, we find the 2025 hourly rate of $465 to be reasonable

Item	Reason
	and we apply it here. We apply ½ of Gersen's 2025 rate of $465 for an intervenor compensation claim preparation rate of $232.50. The award made herein for the consultant's contribution shall be passed through in full to the consultant, and no portion of this part of the award shall be kept by the intervenor. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission's policy on consultant compensation, and the understanding that the consultant has not billed or collected compensation for the work performed until final award is given. We reiterate that it is the responsibility of the intervenor to provide the appropriate documentation with the initial claim to ensure efficient processing, and thus avoid the need for the Commission to request supplemental documentation. In this instance, CEJA did not provide all the documentation pertaining to the contract terms between CEJA and Gersen in the initial claim and waited until the Commission requested supplemental documentation which delays the processing of the claim.
[4] Maya DeGasperi 2022, 2023, 2024 Hourly Rate & 2025 Intervenor Compensation Rate	CEJA has identified DeGasperi as an employee of Earthjustice and serves as a consultant to CEJA. The Commission requested supplemental documentation be submitted by CEJA to confirm the rates charged by DeGasperi. CEJA has confirmed that per the terms of their contract, DeGasperi has been hired on a contingency rate basis, meaning the consultant has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on DeGasperi's experience. CEJA is requesting first-time hourly rates for DeGasperi in 2022 for $125, 2023 for $130, 2024 for $135 and 2025 for $140 as a Legal – Paralegal – III. DeGasperi graduated from Macalester College in 2020 with a B.A. in Environmental Studies with an emphasis on Environmental Justice and a minor in Geography. Since 2020, Ms. DeGasperi has performed legal assistant and paralegal duties supporting litigation teams. She has served in her current role in the Clean Energy Program at Earthjustice since 2021, where she has developed specific expertise regarding Public Utilities Commission litigation in numerous states, including substantial experience working on California Public Utilities Commission proceedings. Ms. DeGasperi performs a wide range of paralegal duties, including reviewing and interpreting factual and technical information, assisting with case management throughout the litigation process, proofreading and cite checking filings, managing and reviewing discovery, assembling exhibits and assisting with hearings, providing internal guidance regarding venue rules, training and

Item	Reason
	mentoring new litigation assistants, and conducting case-related research and case development investigations. Given the 2022 the Legal – Paralegal – II rate range is \$106.55 to \$167.51 with a median of \$134.83, we find the requested 2022 hourly rate of \$125 to be reasonable and we apply it here. Given the 2023 the Legal – Paralegal – II rate range is \$112.56 to \$173.52, with a median of \$140.84, we find the requested 2022 hourly rate of \$130 to be reasonable and we apply it here. Given the 2024 the Legal – Paralegal – II rate range is rate range is \$118.29 to \$179.25, with a median of \$146.57, we find the requested 2022 hourly rate of \$135 to be reasonable and we apply it here. Given the 2025 the Legal – Paralegal – II rate range is rate range is rate range is \$123.36 to \$184.32, with a median of \$151.64, we find the requested 2022 hourly rate of \$140 to be reasonable and we apply it here. We apply ½ of DeGasperi's 2025 rate of \$140 for an intervenor compensation claim preparation rate of \$70. The award made herein for the consultant's contribution shall be passed through in full to the consultant, and no portion of this part of the award shall be kept by the intervenor. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission's policy on consultant compensation, and the understanding that the consultant has not billed or collected compensation for the work performed until final award is given. We reiterate that it is the responsibility of the intervenor to provide the appropriate documentation with the initial claim to ensure efficient processing, and thus avoid the need for the Commission to request supplemental documentation. In this instance, CEJA did not provide all the documentation pertaining to the contract terms between CEJA and DeGasperi in the initial claim and waited until the Commission requested supplemental documentation which delays the processing of the claim.
[5] Angelica Navarro 2023 Hourly Rate & 2025 Intervenor Compensation Rate	CEJA has identified Navarro as an employee of Earthjustice and serves as a consultant to CEJA. The Commission requested supplemental documentation be submitted by CEJA to confirm the rates charged by Navarro. CEJA has confirmed that per the terms of their contract, Navarro has been hired on a contingency rate basis, meaning the consultant has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency,

Item	Reason
	we utilize the reasonable rates established by Resolution ALJ-393 based on Navarro's experience. Given the 2023 Legal – Paralegal – I rate range is $97.52 to $150.48, with a median of $122.56, we find the 2023 hourly rate of $120 to be reasonable and we apply it here. Given the 2025 Legal – Paralegal – I rate range is $106.92 to $159.88, with a median of $131.93, we find the 2025 hourly rate of $130 to be reasonable and we apply it here. We apply ½ of Navarro's 2025 rate of $130 for an intervenor compensation claim preparation rate of $65. The award made herein for the consultant's contribution shall be passed through in full to the consultant, and no portion of this part of the award shall be kept by the intervenor. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission's policy on consultant compensation, and the understanding that the consultant has not billed or collected compensation for the work performed until final award is given. We reiterate that it is the responsibility of the intervenor to provide the appropriate documentation with the initial claim to ensure efficient processing, and thus avoid the need for the Commission to request supplemental documentation. In this instance, CEJA did not provide all the documentation pertaining to the contract terms between CEJA and Navarro in the initial claim and waited until the Commission requested supplemental documentation which delays the processing of the claim.
[6] Sasan Saadat 2022, 2023 Hourly Rate	CEJA has identified Saadat as an employee of Earthjustice and serves as a consultant to CEJA. The Commission requested supplemental documentation be submitted by CEJA to confirm the rates charged by Saadat. CEJA has confirmed that per the terms of their contract, Saadat has been hired on a contingency rate basis, meaning the consultant has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on Saadat's experience. Given the 2022 Expert – Energy & Resources Expert – II rate range is $111.90 to $243.60, with a median of $157.52, we find the 2022 hourly rate of $195 to be reasonable and we apply it here.

<table>
<tr><th>Item</th><th>Reason</th></tr>
<tr><td></td><td>Given the 2023 Expert – Energy & Resources Expert – II rate range is $118.93 to $250.63, with a median of $164.55, we find the 2023 hourly rate of $200 to be reasonable and we apply it here.

The award made herein for the consultant’s contribution shall be passed through in full to the consultant, and no portion of this part of the award shall be kept by the intervenor. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission’s policy on consultant compensation, and the understanding that the consultant has not billed or collected compensation for the work performed until final award is given.

We reiterate that it is the responsibility of the intervenor to provide the appropriate documentation with the initial claim to ensure efficient processing, and thus avoid the need for the Commission to request supplemental documentation. In this instance, CEJA did not provide all the documentation pertaining to the contract terms between CEJA and Saadat in the initial claim and waited until the Commission requested supplemental documentation which delays the processing of the claim.</td></tr>
<tr><td>[7] Vespa 2022, 2023 & 2024 Hours</td><td>The following time records submitted for Vespa in 2022 combine several specific tasks in their timesheet entries. Time records must not combine hours for several specific tasks in one timesheet entry. See Rule 17.4(b)(2) and IComp Program Guide at 25.

Therefore, the following hours are reduced by 50% from Vespa’s 2022 hours for combining several tasks in one timesheet entry:
07/05/2022, “Review PHC meet and confer email; calendar dates; review SoCalGas protest response; prepare 3-day ex parte advance notice; confer w/clients re same.” CEJA claimed a total of 0.70 hours in this entry. Rounding to the nearest hundredth, 0.35 hours are disallowed.
07/06/2022, “Prep for meet and confer on PHC, meet and confer, email clients re same, solicit feedback.” CEJA claimed a total of 0.90 hours in this entry. Rounding to the nearest hundredth, 0.45 hours are disallowed.
07/09/2022, “Add edits to PHC Statement; prepare for ex parte mtg; ex parte mtg; write up notice.” CEJA claimed a total of 1.10 hours in this entry. Rounding to the nearest hundredth, 0.55 hours are disallowed.</td></tr>
</table>

Item	Reason
	• 12/05/2022, "Legal research on a/c, ratepayer funding of advocacy, disallowing unauthorized expenses; draft DR 10; review Sadaat testimony on vehicles." CEJA claimed a total of 2.90 hours in this entry. Rounding to the nearest hundredth, 1.45 hours are disallowed. • 01/12/2023, "Review SoCalGas DR responses, review, edit testimony on AGA dues, discus same with RB; review DR responses on vehicle fleet/refueling; edit draft testimony re same." CEJA claimed a total of 2.50 hours in this entry. Rounding to the nearest hundredth, 1.25 hours are disallowed. • 01/17/2023, "Email SoCalGas re: meet and confer response; review supplemental response to DR 11, Draft DR 13, review, edit testimony on vehicle fleet and refueling; draft testimony on gas distribution costs." CEJA claimed a total of 7.50 hours in this entry. Rounding to the nearest hundredth, 3.75 hours are disallowed. • 01/19/2023, "Email SoCalGas re - 40 -elinquency of DR responses; review edit fleet, refuleing testimony, draft DR 13, send DR 13." CEJA claimed a total of 5.00 hours in this entry. Rounding to the nearest hundredth, 2.50 hours are disallowed. • 01/25/2023, "Review, edit testimony on AGA; outline motion to compel; discuss remaining issues with vehicle testimony with Sadaat, Gersen." CEJA claimed a total of 2.50 hours in this entry. Rounding to the nearest hundredth, 1.25 hours are disallowed. • 02/21/2023, "Review revised response to DR 9; research same; respond to SoCalGas; meet and confer (twice) with SoCalGas; draft DR 18." CEJA claimed a total of 3.70 hours in this entry. Rounding to the nearest hundredth, 1.85 hours are disallowed. • 02/28/2023, "Draft reply to motion to compel; discuss testimony review and next steps with Team; draft testimony on gas distribution costs." CEJA claimed a total of 5.00 hours in this entry. Rounding to the nearest hundredth, 2.50 hours are disallowed.

Item	Reason
	<u>Vagueness (0.70 hours):</u> The following activity is reduced for being vague and lacking the necessary detail to demonstrate how it contributed to the decision-making process: • 11/18/2024 – Ex parte, review ex parte notice (0.70 hours) We remind CEJA, per the Intervenor Compensation Program Guide at p.24, Intervenor's records should identify specific issues for which it seeks compensation.
[8] Barker 2023 & 2024 Hours	Barker's 2023 hours are reduced by 3.00 hours for the activities below: <u>Did Not Contribute to the Decision-Making Process:</u> The following activity did not contribute to the decision-making process. We therefore reduce the following hours: • 01/23/2023, "Legal research for motion to compel on outside counsel expenses." (1.00) • 01/24/2023, "Legal research for motion to compel on outside counsel expenses." (2.00) <u>Vagueness (0.70 hours):</u> The following activity is reduced for being vague and lacking the necessary detail to demonstrate how it contributed to the decision-making process: • 11/13/2024 – Drafting ex parte notice (0.20 hour) • 11/18/2024 – Drafting ex parte post meeting notice (0.50 hour) We remind CEJA, per the Intervenor Compensation Program Guide at p.24, Intervenor's records should identify specific issues for which it seeks compensation.
[9] Gersen's 2022 & 2023 Hours	<u>Lack of Contribution to Decision Making Process (0.30 hours):</u> NDAs constitute preparatory work rather than an analysis or advocacy that shaped the Commission's decision, and CEJA has not demonstrated a clear connection between NDA related hours and its substantive input. Additionally, activities such as executing or reviewing NDAs are considered administrative and procedural which attorneys are not compensated for, as such work has been factored into the established rates. See the Intervenor Compensation Program Guide at 12. Therefore, the following hours have been reduced:

Item	Reason
	• 08/12/2022: "Review protective order and execute NDA." (0.30 hours) Vagueness (0.40 hours): The following activity is reduced for being vague and lacking the necessary detail to demonstrate how it contributed to the decision-making process: • 06/01/2023 – Hearing tech run-through (0.40 hour) We remind CEJA, per the Intervenor Compensation Program Guide at p.24, Intervenor's records should identify specific issues for which it seeks compensation. Clerical Tasks (3.10 hours): The Commission does not compensate attorneys for time spent on clerical and administrative tasks, as such work has been factored into the established rates. See the Intervenor Compensation Program Guide at 12 and 22. Therefore, we reduced the following hours: • 02/01/2023: "Create doc review template for agency comment letters." (0.3 hours) • 02/22/2023: "Email SEU counsel to request meet and confer and responsive answers to DRs re SDGE CEI requests." (0.5 hours) • 06/16/2023: "Administrative hearing matters, moving Week 1 exhibits into record." (1.00 hours) • 09/05/2023: "Review cite check for my sections" (1.30 hours)
[10] DeGasperi's 2022 hours	Vagueness (1.00 hour): The following activity is reduced for being vague and lacking the necessary detail to demonstrate how it contributed to the decision-making process: • 08/30/2022 – Proofreading Ex Parte Notice (1.00 hour) We remind CEJA, per the Intervenor Compensation Program Guide at p.24, Intervenor's records should identify specific issues for which it seeks compensation.
[11] Intervenor Responsibility for Transparency and Accuracy in Compensation Requests	The Commission takes this opportunity to remind all intervenors that they bear the burden of providing accurate, complete, and honest information in all compensation requests. The Commission relies on intervenors' good faith representations, particularly regarding consultant agreements and payments, as it does not have the resources to review every contract or non-standard arrangement in detail. Intervenor compensation is funded by ratepayers, and the Commission takes seriously any effort to mislead or obscure the financial basis for a claim. Although no violation of Rule 1.1 has been found in this instance, we remind

Item	Reason
	intervenors that under Rule 1.1, intent to deceive is not required for a violation, misstatements may still be actionable. Dishonest or misleading claims not only risk denial of compensation but may also subject the intervenor to penalties. The Commission has clear authority to audit intervenors' books and records to verify the basis for any award. Intervenors must therefore ensure full transparency regarding actual time spent on issues, consultant fees, payment arrangements, and the actual disbursement of funds. Failure to meet this obligation undermines the integrity of the compensation process and may lead to denial of claims or further enforcement action.

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. California Environmental Justice Alliance has made a substantial contribution to D.24-12-074.

2. The requested hourly rates for California Environmental Justice Alliance'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 $560,706.00.

CONCLUSION OF LAW

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

ORDER

1. California Environmental Justice Alliance is awarded $560,706.00.

2. Within 30 days of the effective date of this decision, Southern California Gas Company, and San Diego Gas & Electric Company shall pay California Environmental Justice Alliance their respective shares of the award, based on their California-jurisdictional gas revenues for the 2023 calendar year, to reflect the year in which the proceeding was primarily litigated. If such data is unavailable, the most recent electric and gas 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 May 6, 2025, the 75th day after the filing of California Environmental Justice Alliance'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:	D2609071	**Modifies Decision?**	No
Contribution Decision(s):	D2412074		
Proceeding(s):	A2205015, A2205016		
Author:	ALJ Larsen & ALJ LeQuang		
Payer(s):	Southern California Gas Company, and San Diego Gas & Electric Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
California Environmental Justice Alliance	2/20/2025	$572,474.50	$560,706.00	N/A	*See* Part III.D CPUC Comments, Disallowances, and Adjustments above.

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate[12]	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Matthew	Vespa	Attorney	$515	2022	$515
Matthew	Vespa	Attorney	$540	2023	$540
Matthew	Vespa	Attorney	$560	2024	$560
Matthew	Vespa	Attorney	$585	2025	$585
Rebecca	Barker	Attorney	$235	2022	$235
Rebecca	Barker	Attorney	$245	2023	$245
Rebecca	Barker	Attorney	$255	2024	$255
Rebecca	Barker	Attorney	$265	2025	$265
Sara	Gersen	Attorney	$415	2022	$415
Sara	Gersen	Attorney	$435	2023	$435

[12] All persons in this claim have been identified as a consultant working for CEJA.

Sara	Gersen	Attorney	$475	2025	$465
Maya	DeGasperi	Paralegal	$125	2022	$125
Maya	DeGasperi	Paralegal	$130	2023	$130
Maya	DeGasperi	Paralegal	$135	2024	$135
Maya	DeGasperi	Paralegal	$140	2025	$140
Angelica	Navarro	Paralegal	$120	2023	$120
Angelica	Navarro	Paralegal	$130	2025	$130
Sasan	Saadat	Expert	$195	2022	$195
Sasan	Saadat	Expert	$205	2023	$200

(END OF APPENDIX)