

Decision 26-10-032 October 8, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Investigation on the
Commission's Own Motion into Natural Gas
Prices During Winter 2022-2023 and Resulting
Impacts to Energy Markets.

Investigation 23-03-008
(Filed March 16, 2023)

**DECISION GRANTING COMPENSATION TO CENTER FOR ACCESSIBLE
TECHNOLOGY FOR SUBSTANTIAL CONTRIBUTION TO DECISION 26-02-058**

Intervenor: Center for Accessible Technology (CforAT)	For contribution to Decision D.26-02-058
Claimed: \$39,442.50	Awarded: \$36,804.00
Assigned Commissioner: Karen Douglas	Assigned ALJ: Robyn Purchia

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	Decision 26-02-058 (the Final Decision) identifies factors that contributed to a natural gas price spike during the winter of 2022-2023. It does not find that regulated gas utilities took improper or intentional action in relation to the gas price spike but it does find that steps should be taken to communicate more effectively and to mitigate the impact of any future gas price spikes on California ratepayers. It also requires changes to the Incentive Mechanisms for PG&E and SoCal Gas and takes steps to increase transparency by gas utilities.
--	--

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812¹:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	May 15, 2023	May 16, 2023
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	6/15/2023	Verified
4. Was the NOI timely filed?		Yes
Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	See comment below	R.22-11-013
6. Date of ALJ ruling:	See comment below	March 15, 2024
7. Based on another CPUC determination (specify):	See comment below	A finding of customer status was established in R.22-11-013 on 3/15/2024. The current proceeding I.23-03-008, commenced within one year of that date, creates a rebuttable presumption of eligibility here.
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	See comment below	R.22-11-013
10. Date of ALJ ruling:	See comment below	March 15, 2024
11. Based on another CPUC determination (specify):	See comment below	A finding of customer status was established in R.22-11-013 on 3/15/2024. The current proceeding I.23-03-008, commenced within one year of that date, creates

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

	Intervenor	CPUC Verification
		a rebuttable presumption of eligibility here.
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.26-02-058	Verified
14. Date of issuance of Final Order or Decision:	March 5, 2026	Verified
15. File date of compensation request:	April 28, 2026	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
	At the time this proceeding was initiated on March 16, 2023, the most recent ruling finding CforAT to be eligible for intervenor compensation based on a showing of eligible customer status and financial hardship had been issued on November 9, 2021 in R.21-06-017. The next finding that CforAT made a showing of financial hardship was issued on June 14, 2023 in R.22-11-013. While the June 14, 2023 finding was issued after this proceeding was initiated, our timely NOI was filed the next day, on June 15, 2023. The NOI cited the finding in R.22-11-013. CforAT has repeatedly been found to be eligible for compensation at all times since we began representing our constituency of utility customers with disabilities in 2011.	Verified. R.22-11-013 on 3/15/2024 provides rebuttable presumption of customer status and significant financial hardship.

PART II: SUBSTANTIAL CONTRIBUTION

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
Background/Overview: This proceeding covered a broad range of technical and policy issues in response to a substantial spike in natural gas prices during the winter of 2022-2023. The issues included an investigation into whether gas utilities in California contributed to the natural gas price spike, the gas storage and incentive programs of the natural gas utilities and other matters of utility management. It also considered on a policy basis possible action the Commission could take to avoid potential future gas price spikes, support customers in the event of a gas price spike and mitigate the impacts of a price spike on customers. While CforAT monitored all aspects of the proceeding, in keeping with our professional responsibilities, CforAT did not actively participate on the technical issues or on issues related to utility incentive programs. In keeping with our focus on the needs of our constituency, we participated actively on questions considering the impact of gas price spikes on utility customers, particularly vulnerable customers with disabilities and medical needs (who are disproportionately	The Final Decision in this proceeding, D.26-02-058, addresses the factors that contributed to a gas price spike during the winter of 2022-2023, evaluates whether any entity within the Commission's jurisdiction played a role in causing or contributing to the gas price spike, considered changes to the large gas utility incentive mechanisms, addressed large gas utility procurement and hedging strategies, and considered methods to better communicate with customers and mitigate impacts in case of a future gas price spike. The actions taken in the Final Decision regarding customer communications and mitigation efforts are broadly consistent with the recommendations of CforAT, which focused on these area in our participation in the proceeding. CforAT's direct contributions to the Final Decision are set forth in detail below.	We note that this is a general overview and summary of D.26-02-058 for which CforAT is requesting compensation.

low-income), and ways to improve communication and otherwise mitigate impacts of any future gas price spikes. In order to address these issues, CforAT submitted the following formal filings in the proceeding: • CforAT Comments on Order Instituting Investigation (Comments on OII), filed April 19, 2023; • CforAT’s Reply Comments on Assigned Commissioner’s Ruling Directing and Authorizing Responses to Additional Questions (Reply Comments on Mitigation Ruling), filed on October 6, 2023; • CforAT’s Comments on Attachment to First Amended Scoping Memo (Comments on May 13 ACR), filed on June 10, 2024; • Comments on Proposed Decision, filed on February 12, 2026 in conjunction with TURN; and • Reply Comments on Proposed Decision, filed on February 17, 2026 in conjunction with TURN.		
Definition of Gas Price Spike Event: CforAT proposed to set the definition of a gas price spike event based on increases to customer bills, with the	The Commission considered CforAT’s recommendation to base a definition on a set increase in customer bills, and found it “reasonable to base the	Verified

#	Intervenor's Comment(s)	CPUC Discussion
threshold set at 10% or more (calculated separately for CARE, FERA and non-CARE/FERA customers). CforAT Comments on May 13 ACR at pp. 7-8. When the Proposed Decision instead set the definition of a gas price spike as a deviation from the 10-year average price, CforAT recommended modifying the formula to exclude prior gas price spike events from the calculation. CforAT & TURN Comments on PD at pp. 1-2.	threshold on gas prices and the associated bill impact..." Final Decision at p. 57. While it determined that a gas price spike should be considered a rare event based on higher increases than recommended by CforAT, <i>see</i> Final Decision at p. 58, CforAT's input informed the analysis leading to establishment of a gas price spike threshold. It is well established that an intervenor may be awarded 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. <i>See e.g.</i> 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"). The Proposed Decision issued on January 23, 2026 set a definition of a gas price spike based on a straight 10-year average price. Proposed Decision at p. 54. In response to comments, the Final Decision adopts the clarification proposed by CforAT on the calculation of the 10-year average and excludes prior gas price spike events from the calculation. Final Decision at p. 159.	
Mitigation Measures – Cap on Procurement Charge: CforAT supported adoption of a temporary cap on core procurement charges, with	The Final Decision sets a temporary cap on charges a period of amortization to address undercollections. Final	Verified

amortization of undercollections over time. CforAT Comments on May 13 ACR at pp. 7-8; CforAT and TURN Comments on PD at pp. 2-3. After issuance of the Proposed Decision, CforAT opposed recommendations by PG&E to eliminate the cap. CforAT and TURN Reply Comments on PD at pp. 1-2.	Decision at pp. 63-65. Notwithstanding comments on the PD suggesting elimination of the cap, the Final Decision retains it while setting limits on the duration of the cap and the available amortization period. Final Decision at pp. 160-161.	
Mitigation Measures – CRCs: CforAT supported a requirement for gas utilities to provide Community Resource Centers (CRCs) during gas price spike events in order to provide support for customers facing affordability challenges. CforAT Comments on May 13 ACR at pp. 9-11. When the Proposed Decision declined to require CRCs, CforAT requested reconsideration on this issue. CforAT and TURN Comments on PD at p. 4.	While the Final Decision did not modify the prior determination that CRCs are not required, it ordered gas utilities to maintain an updated list of resources that they can communicate to customers during a gas price spike. Final Decision at pp. 161-162.	Partially Verified. Although the Commission declined to require Community Resource Centers, D.26-02-058 adopted a related customer assistance measure requiring utilities to maintain and communicate updated customer resource information during gas price spike events.
Utility Communications – Overall Effectiveness: CforAT supported improved utility communications with customers while noting that “more information and online bill management tools will not provide customers with relief from price spikes.” CforAT Reply Comments on Mitigation Ruling at pp. 2-3, 5,	While the Final Decision finds that the large utilities’ communications surrounding the 2022-2023 gas price spike were timely and adequate, it expressly agrees with CforAT “that utility communications do not provide relief to customers who are already enrolled in assistance programs or who cannot reduce their energy usage.”	Verified

and 7; <i>see also</i> CforAT Comments on May 13 ACR at pp. 2-3. Notwithstanding this caveat, CforAT supported a requirement for gas utilities to provide timely notice to customers based on increases in gas commodity costs or bills. CforAT Comments on May 13 ACR at p. 3. Following issuance of a Proposed Decision including various notification requirements, CforAT opposed recommendations from PG&E to substitute information explaining how customers can sign up for bill forecast alerts through the utility website, arguing that this would put the burden of seeking information on the customer and would be particularly problematic for those without consistent internet access. CforAT and TURN Reply Comments on PD at pp. 2-3. As part of our focus on ensuring that communication about gas price spikes is effective, CforAT did not oppose removal of a requirement set out in the Proposed Decision to require bill inserts. In its place, CforAT recommended that the Commission add a requirement to include information about price spike events in the script for customer assistance calls as an additional information	Final Decision at p. 122. In this context, the Final Decision introduces various mitigation measures intended to reduce harm to customers in the event of another gas price spike. <i>Id.</i> While the Final Decision authorizes the gas utilities to encourage customers to visit utility websites or call their utility for more information, it agrees with CforAT and TURN “that limiting access to information for customers without regular internet access would be inadequate.” Final Decision at p.166. The Final Decision removes the bill insert requirement that was incorporated in the Proposed Decision and adds a requirement to include information to customers through a variety of alternative channels, including the scripts used by customer service representatives on all incoming and outgoing customer assistance calls. Final Decision at p. 137; <i>see also id.</i> at pp. 147, 167 and 196 (Ordering Paragraph 4(b)).	
---	--	--

channel available to customers any time they contact their utility. CforAT and TURN Reply Comments on PD at p. 3.		
Utility Communications – Need for Effective Communication: CforAT recommended that all gas utilities ensure that their websites and online tools comply with web accessibility standards. CforAT Reply Comments on Mitigation Ruling at p. 6. CforAT also recommended that communications be made available across multiple channels in languages and formats that support accessibility, including channels available to customers with limited or no internet access. CforAT Comments on May 13 ACR at p. 4.	The Final Decision notes CforAT’s recommendations to “make communications available across multiple channels in languages and formats that promote accessibility.” Final Decision at p. 133. The gas utilities are then directed to provide communications that “ensure language and disability access, including that information posted on a utility website conforms to web accessibility standards.” Final Decision at pp. 148 and 198 (Ordering Paragraph 7).	Verified
Utility Communications – Improved Communication regarding Payment Plans: CforAT recommended that gas utility communications should inform customers of existing payment options and assistance programs. CforAT Comments on OII at pp. 4-5; CforAT Comments on May 13 ACR at pp. 5-6.	The Final Decision “agree[s] with the parties that increased communication on payment plan options is beneficial during gas price spikes,” and directs all gas utilities to notify customers of any future gas price spike, including information them of payment plan options and the Commission’s CHANGES program. Final Decision at pp. 135-137; p. 196 (Ordering Paragraph 4(a) & (b)).	Verified
Utility Communications – Partnership with CBOs		Verified

CforAT supported gas utility use of CBO partnerships (including utility support for partner CBOs) to help support customers, as well as increased charitable support by the gas utilities themselves. CforAT Comments on May 13 ACR at pp. 4-5; CforAT Comments on OII at p. 5.	The Final Decision requires distribution of information through multiple channels, including information about the CHANGES program and information in-language and in accessible formats. Final Decision at pp. 135-137. CBO partnerships the basis of the CHANGES program and are a key element of effective communication with customers who re hard to reach using standard forms of outreach.	
Utility Communications – Additional Information: CforAT generally supported requirements to provide customers with useful information, while noting that some forms of technical information may not be useful for the average residential customer. CforAT Comments on May 13 ACR at pp. 6-7.	The Commission agreed with CforAT “that more information, rather than less, is generally beneficial during a price spike event” (while also agreeing that the average residential customer would be unlikely to find the information on PG&E’s Pipe Ranger website and SoCalGas’s Envoy website to be useful). Final Decision at p. 150.	Verified

A. 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: While the various consumer advocates focused on different elements of this proceeding, CforAT took similar overall positions on multiple issues regarding mitigation and communication as Cal Advocates, TURN, UCAN, and SBUA. On various issues, CforAT also took overall positions similar to those addressed by the environmental advocates, including Sierra Club,		Noted

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?	Yes	Verified
NRDC, EDF, even when we approached the issues from different perspectives. <i>See e.g.</i> Final Decision at p. 54 (noting that CforAT, EDF, TURN and UCAN all recommended looking at customer bill impacts to define a gas price spike event); Final Decision at p. 60 (noting that CforAT, SBUA and TURN all support adoption of a temporary cap on core procurement charges). On a limited number of issues, consumer advocates, environmental advocates and gas utilities all agreed. <i>See e.g.</i> Final Decision at p. 69 (noting that Cal Advocates, CforAT, EDF, PG&E, SCE, SDG&E, SoCalGas and Southwest Gas all referenced assistance programs and payment plans as measures to mitigate harm to ratepayers during a gas price spike).		

d. Intervenor's claim of non-duplication:	Noted
As noted above, CforAT focused our participation in this proceeding on issues of bill impacts, communications and mitigation in the context of potential future gas price spikes. We did not address the technical issues of causes of gas price spikes or management of the natural gas system (including storage or hedging), nor did we substantively address the gas utility incentive mechanisms. In this way, we avoided duplication of effort with those parties with greater expertise in these issue areas. On the issues where we actively participated, CforAT coordinated with other advocates as appropriate. We also maintained our focus on the specific needs of our constituency of gas customers with disabilities and medical needs. This population is disproportionately low-income and faces unique challenges with communications. This population is also at heightened risk of health and safety challenges in the event of a gas price spike. While the needs of this population overlapped with the needs of other residential utility customers, it is appropriate for them to have unique representation do to the substantial impacts they face during gas price spikes.	

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

	CPUC Discussion
a. Intervenor’s claim of cost reasonableness: As noted above, CforAT’s participation in this proceeding focused on the need for effective communication and mitigation efforts in the event of future gas price spikes, as well as the determination of how to define a gas price spike event. This work will serve to reduce the risk of harm from future gas price spikes for our constituency of utility customers with disabilities, a population that is particularly vulnerable because it includes customers who are not only disproportionately low-income, but also who are highly dependent on affordable and reliable access to energy to protect their health and safety. It is difficult to assign a dollar value to the benefits of improved communication and mitigation measures for future gas price spike events, given that the number and timing of such future events is unclear and the financial value of harm mitigation is uncertain. Nevertheless, the benefit to CforAT’s constituency of vulnerable utility customers is high and can be expected to outweigh the modest costs of CforAT’s participation. Given the importance of the issues to CforAT’s constituency, CforAT’s level of participation was appropriate.	Noted
b. Reasonableness of hours claimed: The number of hours contained in CforAT’s request for compensation is reasonable given the numerous technical and complex issues being considered in this proceeding, particularly in light of CforAT’s determination to focus our efforts on the elements of the proceeding that most impact our constituency. As noted above, CforAT coordinated with other advocates as appropriate throughout this proceeding. Each organization came into the proceeding possessing different, complementary areas of expertise, and each focused on their key areas throughout the proceeding, which reduced the risk of overlapping efforts and ensured that the work completed by each person and organization was efficient. Internally, CforAT’s work on this proceeding was led by Legal Director Melissa W. Kasnitz, who has extensive experience addressing issues impacting customer energy bills, as well as in effective communication and mitigation efforts. Ms. Kasnitz delegated discreet tasks to CforAT’s junior attorneys, first Alexandra Green and then Rachel Sweetnam. While Ms.	Noted

	CPUC Discussion
Kasnitz appropriately supervised and reviewed the work of the junior attorneys, this type of delegation is appropriate and efficient, particularly in light of the substantial differences in the hourly rates for Ms. Kasnitz and the junior attorneys. Accordingly, CforAT's hours spent on this proceeding are reasonable.	
c. Allocation of hours by issue: 2023 – Kasnitz Time (14.3 hours total) Communications/Mitigation: 11.8 hours (83%) The issue area "Communications/Mitigation" includes time spent on work considering the impacts of gas price spikes on customers and appropriate methods for communicating with customers about the impacts, as well as methods for mitigating the impacts of gas price spikes and communicating with customers about the mitigation options. General Participation: 2.5 hours (17%) The issue area "General Participation" includes time spent on procedural matters, as well as time spent monitoring activity in the proceeding where CforAT did not actively participate to ensure that we appropriately kept track of activity in the proceeding in order to best address the needs of our constituency. While general participation regularly includes activity such as reviewing initial documents before the key issues of a proceeding are identified and reviewing other formal activity such as rulings, in this proceeding it also included time spent reviewing and considering material such as the various White Papers that made up a substantial portion of the record. While CforAT declined to actively participate in the comment cycles on the various White Papers and other more technical matters, it is appropriate as a matter of professional responsibility to stay aware of activity within a proceeding and evaluate its impact on our constituency. The modest amount of time spent on such activity was crucial to allow for our effective and efficient participation on those areas where we focused our attention, and thus is reasonable for compensation. 2023 – Green Time (8.9 hours total) Communications/Mitigation: 8.2 hours (92%) General Participation: 0.7 hours (8%) 2023 – Sweetnam Time (15.8 hours total) Communications/Mitigation: 12.8 hours (81%) General Participation: 3.0 hours (19%)	Noted

	CPUC Discussion
2024 – Kasnitz Time (10.0 hours total) Communications/Mitigation: 7.4 hours (74%) General Participation: 2.6 hours (26%) 2024 – Sweetnam Time (3.3 hours total) Communications/Mitigation: 3.3 hours (100%) 2025 – Kasnitz Time (4.7 hours total) General Participation: 4.7 hours (100%) 2025 - Sweetnam Time (0.2 hours total) General Participation: 0.2 hours (100%) 2026 – Kasnitz Time (9.4 hours total) Communications/Mitigation: 9.4 hours (100%)	

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	2023	14.3	\$ 715	D.24-06-018	\$ 10,224.50	13.90 [1]	\$ 715 [2]	\$9,223.50
Melissa W. Kasnitz	2024	10.0	\$ 735	D.24-10-028	\$ 7,350.00	10	\$ 735 [2]	\$7,276.50
Melissa W. Kasnitz	2025	4.7	\$ 755	D.25-10-060	\$ 3,548.50	4.40 [3]	\$ 755 [2]	\$3,322.00
Melissa W. Kasnitz	2026	9.4	\$ 820	See comment below	\$ 7,708.00	9.40	\$ 780 [2]	\$7,098.00
Rachel Sweetnam	2023	15.8	\$ 220	D.24-06-022	\$ 3,476.00	15.80	\$ 220 [4]	\$3,432.00

CLAIMED						CPUC AWARD		
Rachel Sweetnam	2024	3.3	\$ 240	D.25-04-041	\$ 792.00	3.30	\$ 240 [4]	\$792.00
Rachel Sweetnam	2025	0.2	\$ 275	D.25-10-050	\$ 55.00	0.20	\$ 275 [4]	\$55.00
Alexandra Green	2023	8.9	\$ 220	D.24-09-018	\$ 1,954.00	8.90	\$ 220 [5]	\$1,958.00
Subtotal: \$ 35,108.00						Subtotal: \$34,223.50		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Melissa W. Kasnitz	2023	1.0	\$357.50	½ standard rate	\$ 357.50	1.00	\$357.50 [2]	\$357.50
Melissa W. Kasnitz	2026	9.7	\$410	½ requested rate	\$ 3,977.00	5.70 [6]	\$ 390 [2]	\$2,223.00
Subtotal: \$ 4,334.50						Subtotal: \$2,580.50		
TOTAL REQUEST: \$ 39,442.50						TOTAL AWARD: \$36,804.00		
*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 ²		Member Number		Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation		
Melissa W. Kasnitz		1992		162679		No		
Rachel Sweetnam		5/2023		350075		No		
Alexandra Green		12/2/2022		346771		No		

² This information may be obtained through the State Bar of California's website at <https://apps.calbar.ca.gov/attorney/LicenseeSearch/QuickSearch>.

C. Attachments Documenting Specific Claim and Comments on Part III³:

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Detailed Time Records (including Merits time and time on compensation)
	2026 Rate for Melissa W. Kasnitz: No rate has yet been set for Melissa Kasnitz in 2026. She has previously requested the rate of \$820 per hour in a request for compensation filed in A.24-10-006 on March 20, 2026 and in a compensation request filed in A.23-11-002 on March 23, 2026. No action has yet been taken on these pending requests. The justification for this requested rate was set forth in each of these prior compensation requests and is repeated again below in full for convenience: In D.22-07-018 (July 14, 2022), the Commission set Ms. Kasnitz’s rate, determining that based on her experience, a rate of \$670 was appropriate whether she was categorized as a Legal Director III or a Legal Director V,⁴ stating: Although CforAT requests a 2021 rate of \$760/hour for Kasnitz, we ultimately adopt a rate of \$670/hour. The \$670 rate is reflective of Kasnitz’s 4 years of experience as CforAT’s Legal Director and an additional 18 years’ Commission-related experience as a practicing attorney, on balance with Kasnitz’ years long periods of inactivity. According to the hourly rate chart implemented by Resolution ALJ-393, the rate range for Legal Director III (5-10 years) is \$396–\$673, and the rate range for Attorney V (15+years) is \$486 - \$699. A rate on the mid to high end of the range is appropriate for Kasnitz. D. 22-07-008 at p. 15. Notably, that decision did not rule whether Ms. Kasnitz was considered a Level III Legal Director or a Level V Attorney. However, subsequent decisions awarded compensation based on the assumption that Ms. Kasnitz was a Legal Director III. <i>See</i> D. 24-06-018 at pp. 16-17; D.24-10-023 at p. 25; D.25-10-060 at p. 15. Ms. Kasnitz has practiced before the Commission for over two decades and has acted as legal director at CforAT for almost eight years. Despite this fact, for the last several years, Ms. Kasnitz’s rates have not increased

³ Attachments not included in the final Decision.

⁴ This language is quoted correctly, but it should reference either a Legal Director III or an Attorney V.

Attachment or Comment #	Description/Comment
	meaningfully because she is currently at the top of the rate range for the Legal Director III category. Given Ms. Kasnitz's experience and long history of advocacy before the Commission, we respectfully request that the Commission categorize her as a Legal Director IV and set her rate slightly above the median for that range at \$820 an hour.

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason									
[1] Reduction of Hours for Melissa W. Kasnitz in 2023	<u>Administrative and Clerical Work</u> The Commission does not compensate attorneys for time spent on clerical or administrative tasks, as such work is considered subsumed within professional fees. Administrative tasks typically include scheduling, communications with the Commission’s Docket Office regarding filing procedures, overseeing administrative staff, photocopying, scanning, and other similar clerical activities. (See D.11-07-024 at 18.) In line with this policy, we have adjusted the entries below for a total reduction of 0.40 hours: <table><tr><th>Date</th><th>Activity</th><th>Hours</th></tr><tr><td>5/3/2023</td><td>Review Notice of PHC</td><td>0.20</td></tr><tr><td>10/3/2023</td><td>Review workshop notice re: prep for winter; conf. w/ R. Sweetnam re: same</td><td>0.20</td></tr></table>	Date	Activity	Hours	5/3/2023	Review Notice of PHC	0.20	10/3/2023	Review workshop notice re: prep for winter; conf. w/ R. Sweetnam re: same	0.20
Date	Activity	Hours								
5/3/2023	Review Notice of PHC	0.20								
10/3/2023	Review workshop notice re: prep for winter; conf. w/ R. Sweetnam re: same	0.20								
[2] Melissa W. Kasnitz’s 2023-2026 Hourly Rate	D.24-06-018 approved the 2023 hourly rate of \$715.00 for Melissa W. Kasnitz as a Legal – Legal Director - III. Intervenor Compensation Claim Preparation is compensated at ½ preparer’s normal rate, bringing the 2023 claim preparation rate to \$357.50. D.24-10-028 approved the 2024 hourly rate of \$735.00 for Melissa W. Kasnitz as a Legal – Legal Director - III. D.25-10-060 approved the 2025 hourly rate of \$755.00 for Melissa W. Kasnitz as a Legal – Legal Director - III. D.26-07-022 approved the 2026 hourly rate of \$780.00 for Melissa W. Kasnitz as a Legal – Legal Director - III. The reasoning is cited below: For 2026, CforAT states “Ms. Kasnitz has practiced before the Commission for over two decades and has acted as legal director at CforAT for almost eight years...we respectfully request that the Commission categorize her as a Legal Director IV and set her rate slightly above the median for that range at \$820 an hour.” D.22-07-018 and review of the submitted resume found 4 years of									

Item	Reason									
	experience as a Legal Director in 2021, beginning 2017, and awarded a rate commensurate of the combined experience as an Attorney and Legal Director, elaborating “as noted in the proposed decision, the \$670 hourly award falls in the range of award for a Legal Director III – a level of seniority that Ms. Kasnitz has not yet reached.” In 2026, Kasnitz would have 8 years of experience as a Legal Director and would not qualify for an experience level change from Legal Director – III to IV until 2027. Considering the information above, we find the current experience level at Legal Director – III to be appropriate. Using our calculation methodology, based on the approved 2025 hourly rate of \$755.00, application of the 2026 escalation factor of 3.35% and rounding to the nearest allowable \$5 increment: $\$755.00 \times 1.0335 = \780.00 We approve a 2026 hourly rate of \$780.00. Intervenor Compensation Claim Preparation is compensated at ½ preparer’s normal rate, bringing the 2026 claim preparation rate to \$390.00.									
[3] Reduction of Hours for Melissa W. Kasnitz in 2025	<u>Administrative and Clerical Work</u> The Commission does not compensate attorneys for time spent on clerical or administrative tasks, as such work is considered subsumed within professional fees. Administrative tasks typically include scheduling, communications with the Commission’s Docket Office regarding filing procedures, overseeing administrative staff, photocopying, scanning, and other similar clerical activities. (See D.11-07-024 at 18.) In line with this policy, we have adjusted the entries below for a total reduction of 0.30 hours: <table><tr><th>Date</th><th>Activity</th><th>Hours</th></tr><tr><td>9/2/2025</td><td>Review ruling rescheduling workshop</td><td>0.20</td></tr><tr><td>10/9/2025</td><td>Review ruling removing workshop from calendar</td><td>0.10</td></tr></table>	Date	Activity	Hours	9/2/2025	Review ruling rescheduling workshop	0.20	10/9/2025	Review ruling removing workshop from calendar	0.10
Date	Activity	Hours								
9/2/2025	Review ruling rescheduling workshop	0.20								
10/9/2025	Review ruling removing workshop from calendar	0.10								
[4] Rachel Sweetnam’s 2023-2025 Hourly Rate	D.24-06-022 approved the 2023 hourly rate of \$220.00 for Rachel Sweetnam as a Legal – Attorney - I. D.25-04-041 approved the 2024 hourly rate of \$240.00 for Rachel Sweetnam as a Legal – Attorney - I. D.25-10-060 approved the 2025 hourly rate of \$275.00 for Rachel Sweetnam as a Legal – Attorney - II.									

Item	Reason
[5] Alexandra Green's 2023 Hourly Rate	D.24-09-018 approved the 2023 hourly rate of \$220.00 for Alexandra Green as a Legal – Attorney - I.
[6] Excessive IComp Claim Prep Hours	Melissa W. Kasnitz claimed 9.70 hours in 2026 for preparation of the intervenor compensation request. While the claim was generally detailed, organized, and generally compliant with Commission requirements, we find the preparation hours excessive given the scope of issues and overall scale of the request. Melissa W. Kasnitz has several years of experience practicing before the Commission and preparing similar claims, and we would expect greater efficiency in compiling this request. Accordingly, we adjust the claimed hours for a total of 6.70 hours for claim preparation in 2025 and 2026. This adjustment better reflects the complexity and scale of the request.

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

- Center for Accessible Technology has made a substantial contribution to D.26-02-058.
- The requested hourly rates for Center for Accessible Technology's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
- The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
- The total of reasonable compensation is \$36,804.00.

CONCLUSION OF LAW

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

ORDER

1. Center for Accessible Technology is awarded \$36,804.00.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Gas Company, San Diego Gas and Electric Company, and Southwest Gas shall pay Center for Accessible Technology 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 are unavailable, the most recent 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 July 12, 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 October 8, 2026, at Sacramento, California.

JOHN REYNOLDS

President

DARCIE L. HOUCK

KAREN DOUGLAS

CHRISTINE HARADA

Commissioners

Commissioner Matthew Baker
recused himself and did not
participate in the vote of this item.

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:	D2610032	Modifies Decision?	No
Contribution Decision(s):	D2602058		
Proceeding(s):	I2303008		
Author:	ALJ Robyn Purchia		
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Gas Company, and Southwest Gas Corporation		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Center for Accessible Technology	April 28, 2026	\$39,442.50	\$36,804.00	N/A	See Part III.D CPUC Comments, Disallowances and Adjustments

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Melissa	Kasnitz	Attorney	\$ 715	2023	\$ 715
Melissa	Kasnitz	Attorney	\$ 735	2024	\$ 735
Melissa	Kasnitz	Attorney	\$ 755	2025	\$ 755
Melissa	Kasnitz	Attorney	\$ 820	2026	\$ 780
Rachel	Sweetnam	Attorney	\$ 220	2023	\$ 220
Rachel	Sweetnam	Attorney	\$ 240	2024	\$ 240
Alexandra	Green	Attorney	\$ 220	2023	\$ 220

(END OF APPENDIX)