

Decision 26-10-030 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

**DECISION GRANTING COMPENSATION TO UTILITY CONSUMER'S ACTION
NETWORK FOR SUBSTANTIAL CONTRIBUTION TO DECISION 26-02-058**

Intervenor: Utility Consumers' Action Network	For contribution to Decision (D.) D.26-02-058
Claimed: \$23,481.88	Awarded: \$22,695.00
Assigned Commissioner: Karen Douglas	Assigned ALJ: Robyn Purchia

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	In I.23-03-008 the Commission reviewed whether market manipulation or other anomalies caused the winter gas price spikes in 2022 during which gas prices surged across California. Southern California Gas Company's (SoCalGas) customers saw an average 147% increase in their January 2023 gas bills compared to January 2022; Pacific Gas and Electric Company's (PG&E) customers saw an average 30% spike in their January 2023 gas bills. D.26-02-058 determined that certain factors contributed to the 2022-2023 High Natural Gas price crisis. The decision did not find that PG&E, San Diego Gas & Electric Company, SoCalGas, Southwest Gas Corporation, Alpine Natural Gas and West Coast Gas Company took improper or intentional action that caused or contributed to the 2022-2023 gas price spike. However, the Decision did review and generally support improved efforts and enhanced communication strategies
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	that would aid and help ratepayers and vulnerable customers understand, be informed, and avoid negative impacts upon future gas price spike events. To mitigate the impact of a future gas price spike on California's gas ratepayers, the decision required gas utilities to impose a cap on their Core Procurement Charge and to amortize any resulting undercollection. Additionally, gas utilities must provide timely and adequate notice to their customers of a gas price spike event and information about resources. And to build on the lessons learned from the gas price spike event, PG&E and SoCalGas are directed to incorporate the unique constraints (e.g., interstate pipeline constraints, reduced natural gas flows, and reduced storage supplies) experienced during the gas price spike into their internal procurement and hedging strategies. PG&E and SoCalGas are to provide more information to noncore customers by including base volume on their Pipe Ranger Storage Activity and Envoy webpages. Finally, to increase transparency, the decision requires ISPs to publicly report their monthly storage levels.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812¹:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	May 16, 2023	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	June 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:	A.21-12-006	Verified
6. Date of ALJ ruling:	May 27, 2022	Verified
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes

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

	Intervenor	CPUC Verification
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	A.21-12-006	Verified
10. Date of ALJ ruling:	May 27, 2022	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.26-02-058	Verified
14. Date of issuance of Final Order or Decision:	March 5, 2026	Verified
15. File date of compensation request:	May 4, 2026	Verified
16. Was the request for compensation timely?		Yes

PART II: SUBSTANTIAL CONTRIBUTION

A. Did the Intervenor substantially contribute to the final decision (*see* § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059):

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
Issue – Consideration and Evaluation of Risk to Customers Due to Price Spikes and Providing Resources UCAN assessed the risks and impacts to ratepayers and due to the price spikes and recommended mitigations and resources to help customers be informed, prepare, and obtain relief from adverse impacts. UCAN contributed to discussion and helped the Commission fully consider and inform its Decision and the proceeding record.	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. See, <i>e.g.</i>, D.08-04-004 at pp. 5-6; D.09-04-027 at p. 4.	Verified.

UCAN recommended a moratorium on utility service shutoffs during a gas price spike. In addition, UCAN recommended a ban on reporting customer delinquencies to credit agencies during a gas price spike, if not already mandated. D.26-02-058, at p. 65; 275 UCAN Opening Comments on OII, at p. 4; UCAN Reply Comments on September 11, 2023 ACR, at p. 3; UCAN Opening Comments on May 13, 2024 ACR, at p. 5. UCAN (and other Intervenors) supported requiring gas and electric utilities to provide CRCs during gas price spike events. UCAN also recommended that utilities provide CRCs at other times, such as when disconnection rates are high, curtailments are significant, and cold weather is extreme. D.26-02-058, at p. 67; UCAN Opening Comments on May 13, 2024 ACR, at pp. 7-8.	“ . . . we recognize UCAN’s point that a gas price spike may put customers at risk of disconnection and falling into arrears. Implementing UCAN’s recommendations for a disconnection moratorium and a ban on reporting customer delinquencies to credit agencies may help vulnerable customers. However, the record in this proceeding does not contain sufficient information to adopt a disconnection moratorium or ban utilities from reporting customer delinquencies to credit agencies. Accordingly, we decline to adopt a disconnection moratorium or a ban on reporting customer delinquencies to credit agencies at this time. D.26-02-058, at p. 66. “We recognize that CRCs could provide relief to vulnerable Californians during a gas price spike, such as access to hot showers, warmth, and food preparation. However, we must weigh these benefits against other considerations, such as cost and access.” D.26-02-058, at p. 69. “ . . . we encourage PG&E, SoCalGas, SDG&E, and Southwest Gas to coordinate with local governments and health departments within their service territories on an ongoing basis to ensure gas utilities have up-to-date information on resources that can provide relief to vulnerable Californians during a gas price spike. If a gas price spike occurs, as defined in this decision, PG&E, SoCalGas, SDG&E, and Southwest Gas shall make up-to-date information on local resources available to their customers within 24 hours of identifying the gas price spike. D.26-02-058, at p. 69.	
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Issue – Strategies to Enhance Communications to Support and Provide More Information and Resources. UCAN (and other Intervenor) emphasized the importance of notifying customers “in advance how much essential energy services will cost each month.” While UCAN recognized that SDG&E proactively communicated with customers, UCAN opined that the notices significantly understated the scope and impact of the gas price spike. D.26-02-058, at pp. 109-110; UCAN Reply Comments on September 11, 2023 ACR, at p. 3. UCAN and others also highlighted the importance of communicating prices to customers before they receive their bill and recommended various approaches, practices, and improvements relevant to the timing, content, and methods of utility communications as well as payment plan options. D.26-02-058, at pp. 115 – 124; UCAN Reply Comments on September 11, 2023 ACR, at p. 3. UCAN opined that “[c]ontinued, updated and transparent communications can only serve ratepayers better as they will be better warned and prepared for future bill shocks.	“We agree with TURN and UCAN that gas utilities’ winter communications must inform customers of rising prices before customers receive their bills.” D.26-02-058, at p. 110. “While we recognize UCAN’s assertion that SDG&E underestimated the scope and impact of the gas price spike, we also acknowledge that the specific bill impacts were difficult to predict in light of volatility. However, the large utilities provided general information on the impact of bills.” D.26-02-058, at p. 112. “... we agree with the parties that increased communication on payment plan options is beneficial during gas price spikes. Indeed, the Commission previously expressed its expectation that utilities take “aggressive steps” to inform customers of level payment plan options before peak winter months.” D.26-02-058, at pp. 124-125.	Verified
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D.26-02-058, at pp. 120-121; UCAN Comments on OII, at p. 5; UCAN Reply Comments on September 11, 2023 ACR, at p. 3. UCAN recommended increased customer communications regarding payment plan options. UCAN Opening Comments on May 13, 2024 ACR, at pp. 3-4. Intervenors like UCAN also supported a multichannel approach, including text messages, emails, standard mail, bill inserts, web forum discussions, social media platforms, calls, and voicemails. However, the parties differ on whether the Commission should prescribe specific communication methods. UCAN recommends giving gas utilities the flexibility to use the communication channel that best fits customers' needs. D.26-02-058, at p. 123; UCAN Opening Comments on May 13, 2024 ACR, at p. 4. While Parties including UCAN, recommended that utilities timely notify their customers in the event of a gas price spike, to elevate and improve/enhance communications, UCAN also recommended considering rapid, short-term increases in natural gas commodity costs;	“Regarding communication methods, we agree with the parties that a multichannel approach is beneficial. We therefore provide all gas utilities with the flexibility to use the communication tools that best meet their customers’ needs.” D.26-02-058, at p. 126. “... gas customers may be confused if they receive alerts every time there is a rapid, short-term increase in natural gas commodity costs, natural gas supply shortages in other US regions, or extreme cold weather/other non-seasonal weather, as suggested by UCAN.” D.26-02-058, at pp. 135-136. “We also encourage gas utilities to communicate electrification information to customers during a gas price spike if the information is targeted in terms of eligibility, accurate, and relevant to actions that customers can take during or near in time to a price spike. Finally, as directed in Section 6.8, gas utilities shall post on their websites information about resources gathered from local	
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natural gas supply shortages in other US regions; and extreme cold weather/other non-seasonal weather events. D.26-02-058, at p. 134; UCAN Opening Comments on May 13, 2024 ACR, at pp. 1-2.	governments and health departments within their service territories that can provide relief to vulnerable Californians during a gas price spike. Gas utilities shall not interpret these minimum requirements in a manner that would limit the need to provide reasonably timely and adequate communication to their customers. We expect gas utilities to prudently keep customers informed of anticipated price spikes through multiple channels, ensuring they can access the information.” D.26-02-058, at p. 136.	
Issue – More, not Less, Communication is beneficial during price spike event particularly communicating and informing regarding gas volume on Pipe Ranger Site. UCAN commented and supported the suggestion that PG&E’s Pipe Ranger website and SoCalGas’s Envoy website should contain more granular information. D.26-02-058, at p. 137; UCAN Opening Comments on May 13, 2024 ACR, at p. 5. UCAN advocated and supported increased transparency and more information to satisfy and meet ensure public interest goals particularly regarding storage levels. Several parties suggest adding additional ISP reporting requirements with UCAN	“... we also agree with CforAT’s and UCAN’s points that more information, rather than less, is generally beneficial during a price spike event. . . . If PG&E had posted its base gas volume on its Pipe Ranger site, the information may have mitigated uncertainty and confusion. In addition, PG&E expressed its willingness to include its base gas volume on the current Pipe Ranger Storage Activity page. For these reasons, we conclude that it is reasonable to require both PG&E and SoCalGas to include the information.” D.26-02-058, at p. 138. “We find that the public interest favors making some information regarding storage levels public. Requiring ISPs to publicly report storage levels will increase transparency among both the ISPs’ core and noncore customers. Transparency may reduce confusion among ISPs’ customers. However, we share the ISPs’ concern that reporting	Verified

suggesting greater efforts to provide the public with more information. D.26-02-058, at pp. 138-139; UCAN Opening Comments on May 13, 2024 ACR, at p. 6.	daily inventory levels may put the ISPs are a competitive disadvantage and negatively impact the market. Accordingly, we direct ISPs to report their monthly storage levels publicly by the 15th of each month.” D.26-02-058, at p. 140.	
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor’s Assertion	CPUC Discussion
a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: Besides Cal Advocates, other consumer advocates that intervened, with similar positions included TURN, CforAT, and SBUA. These Intervenor, as well as other Parties, addressed consumer protection concerns, communication questions, bill assistance programs, (quasi) environmental matters, and technical/internal procurement, and gas storage procedural strategies.		Noted
d. Intervenor’s claim of non-duplication: UCAN’s intervention, consistent with its mission as an utility consumer advocate, focused on addressing bill impacts, communication improvements, and mitigation for future gas price spikes. Although, as other Intervenor also function with similar organizational missions, where possible UCAN did try to avoid substantially addressing technical or procedural questions raised about the management of the natural gas system, e.g., , gas utility incentive mechanisms, so that UCAN avoided duplication of effort with those parties with experience/insight into those matters. UCAN’s work aided the Commission’s analyses and discussions overall, even when the Decision did not adopt its recommendations. UCAN urges the Commission to find any duplication of effort minor and therefore reasonable.		Noted

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
a. Intervenor’s claim of cost reasonableness: UCAN assessed the risks and impacts to ratepayers and due to the price spikes and recommended mitigations and resources to help customers be informed, prepare, and obtain relief from adverse impacts. UCAN’s participation was kept to its mission to advocate and represent the consumer interests of the ratepayers and customers. The Decision here, regarding customer communications and mitigation efforts UCAN finds, are generally consistent with the recommendations of UCAN even if its specific recommendations were not adopted. UCAN observes this proceeding and its Decision does endorse and adopt various mitigation measures and efforts intended to protect utility ratepayers and avoid/decrease negative impacts that might be caused by future gas price spike events. UCAN contributed to discussion and helped the Commission fully consider and inform its Decision and the proceeding record in this regard. 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. See, <i>e.g.</i>, D.08-04-004 at pp. 5-6; D.09-04-027 at p. 4.	Noted
b. Reasonableness of hours claimed: UCAN believes its participation, intervention, and contribution aided and supported the Commission’s Decision. While it is always challenging, if not outright difficult, to venture an exact “value” to the contributions UCAN believes it made, that value to, and for, UCAN’s membership should balance and outweigh the cost associated with UCAN’s claim. UCAN urges the Commission to find its hours claimed reasonable given the proceeding’s subject matter and conclusions/holdings that address consumer communications, protections and mitigations.	Noted
c. Allocation of hours by issue: UCAN’s overall participation centered around two (2) broad issues: Risk to Customers Due to Price Spikes and Providing Resources; and Strategies to Enhance Communications to Support and Provide More Information and Resources. Given UCAN’s modest claim of hours, we find it consistent and accurate that its hours be allocated 50-50 along those two issues.	Noted

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Edward Lopez	2023	13.25	\$460	D.24-01-019	\$6,095.00	13.25	\$460.00 [1]	\$6,095.00
Edward Lopez	2024	22.75	\$475	D.24-01-019	\$10,806.25	22.75	\$475.00 [1]	\$10,806.25
Edward Lopez	2025	.50	\$485	See Comment 1	\$242.50	0.50	\$485.00 [1]	\$242.50
Edward Lopez	2026	8.75	\$495	See Comment 1	\$4,331.25	8.75	\$495.00 [1]	\$4,331.25
Subtotal: \$21,475.00						Subtotal: \$21,475.00		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Edward Lopez	2023	2	\$230	D.24-01-019	\$460	1.00 [2]	\$230.00 [1]	\$230.00
Edward Lopez	2026	6.25	\$247.50	See Comment 1	\$1,546.88	4.00 [2]	\$247.50 [1]	\$990.00
Subtotal: \$2,006.88						Subtotal: \$1,220.00		
TOTAL REQUEST: \$23,481.88						TOTAL AWARD: \$22,695.00		
*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								

CLAIMED			CPUC AWARD
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ²	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Edward Lopez	December 20, 1991	157052	No

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

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Edward Lopez Hourly Rate Justification 2025: Mr. Lopez’s rate for 2025 is pending a Decision in A.22-05-015/016 ICOMP on the May 14, 2026 voting meeting agenda. 2026: UCAN requests a 2026 rate for Mr. Lopez of \$495. This rate is derived by applying the proper escalation rates of 3.35% for 2026, as published by the Commission in the 2026 version of the hourly rate chart for intervenor compensation (see https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/administrative-law-judge-division/documents/icompat-materials/hourlyratechart-02102026.xlsm). The resulting 2026 rate is \$501.24 rounded up to the nearest \$5, equals \$505. [\$485 x 1.0346 = \$501.24.44 rounded up to the nearest \$5 increment = \$505]. The CPUC approved rate category for Mr. Lopez is “Advocate – Executive Director – V.” Because rate for the category is capped at \$499 for 2026, UCAN requests the highest \$5 increment within the rate category of \$495 instead of the calculated escalation of \$505.

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Edward Lopez’s	D.25-06-028 approved the 2023 hourly rate of \$460.00 for Edward Lopez as an Advocate - Executive Director - V. Intervenor Compensation Claim

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

³ Attachments not included in the final Decision.

Item	Reason
2023-2026 Hourly Rate	Preparation is compensated at ½ preparer’s normal rate, bringing the 2023 claim preparation rate to \$230.00. D.25-06-028 approved the 2024 hourly rate of \$475.00 for Edward Lopez as an Advocate - Executive Director - V. D.26-05-027 approved the 2025 hourly rate of \$485.00 for Edward Lopez as an Advocate - Executive Director - V. D.26-07-028 approved the 2026 hourly rate of \$495.00 for Edward Lopez as an Advocate - Executive Director - V. Intervenor Compensation Claim Preparation is compensated at ½ preparer’s normal rate, bringing the 2026 claim preparation rate to \$247.50.
[2] Excessive Claim Preparation Time	UCAN seeks 8.25 hours for intervenor compensation claim preparation, which amounts to 18% of the total request. This is excessive given the narrow scope of this proceeding and the fact that the sole representative who filed timesheets is also the claim preparer. As an experienced intervenor, their preparation time should have been lower. Accordingly, we award 5.00 hours for IComp claim preparation, which is appropriate for the simplicity and scale of this claim.

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

A. Opposition: Did any party oppose the Claim?	No
B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	Yes

FINDINGS OF FACT

1. Utility Consumers’ Action Network has made a substantial contribution to D.26-02-058.
2. The requested hourly rates for Utility Consumers’ Action Network’s representatives, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$22,695.00.

CONCLUSION OF LAW

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

ORDER

1. Utility Consumers' Action Network is awarded \$22,695.00.
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 Utility Consumers' Action Network their respective shares of the award, based on their California-jurisdictional gas revenues for the 2024 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 18, 2026, the 75th day after the filing of Utility Consumers' Action Network's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.

This decision is effective today.

Dated 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:	D2610030	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
Utility Consumers' Action Network	May 4, 2026	\$23,481.88	\$22,695.00	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
Edward	Lopez	Attorney	\$460	2023	\$460
Edward	Lopez	Attorney	\$475	2024	\$475
Edward	Lopez	Attorney	\$485	2025	\$485
Edward	Lopez	Attorney	\$495	2026	\$495

(END OF APPENDIX)