Decision _____

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 Mar. 16, 2023)

DECISION GRANTING COMPENSATION TO SMALL BUSINESS UTILITY ADVOCATES FOR SUBSTANTIAL CONTRIBUTION TO DECISION 26-02-058

Intervenor: Small Business Utility Advocates	**For contribution to Decision (D.) 26-02-058**
Claimed: $89,488.00	**Awarded:** $71,985.00
Assigned Commissioner: Karen Douglas	**Assigned ALJ:** Robyn Purchia

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.26-02-058 (the Decision) addresses the causes and contributors to the winter 2022-2023 natural gas price spike and adopts measures to reduce the likelihood and mitigate the impact of future gas price spikes. The Decision finds that the price spike was driven by multiple market and system factors, including cold weather, pipeline constraints, reduced natural gas flows, reduced storage supplies, and bidweek events. The Decision adopts customer notification requirements, a temporary Core Procurement Charge cap and amortization framework, additional reporting and transparency requirements, and procurement/incentive-mechanism reforms.

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

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	05/16/23	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	06/15/23	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.22-02-005, *et al*.	A.22-02-005, *et al*. SBUA relies on the August 2, 2022 ALJ ruling in A.22-02-005 et al., which confirmed SBUA's customer status for purposes of Pub. Util. Code §1802(b).
6. Date of ALJ ruling:	08/02/22	Verified
7. Based on another CPUC determination (specify):		
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.22-02-005, *et al*.	A.22-02-005, *et al*. SBUA relies on the August 2, 2022 ALJ ruling in A.22-02-005 et al., which confirmed SBUA's significant financial hardship for purposes of Pub. Util. Code §1802(b).
10. Date of ALJ ruling:	08/02/22	Verified

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

	Intervenor	CPUC Verification
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Verified
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.26-02-058	Verified
14. Date of issuance of Final Order or Decision:	03/05/26	Verified
15. File date of compensation request:	05/4/26	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
B.5-6, B.9-10	SBUA is relying on the ruling on its customer status and showing of significant financial hardship in R.22-02-005, *et al*. on August 2, 2022, within one year prior to I.23-03-008 being instituted. *See* Pub. Util. Code §1804(b)(1).	SBUA notes that its earlier filing mistakenly referenced R.22-02-005 due to a typographical error, and we clarify that the correct proceeding is A.22-02-005 et al. The August 2, 2022, ruling in A.22-02-005 et al. granted SBUA customer status and significant financial hardship, creating a rebuttable presumption under Pub. Util. Code §1804(b)(1) for this proceeding.

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. Utility Communications to Customers SBUA advocated for and recommended numerous utility communications to customers regarding gas price spike events. Specifically, SBUA recommended:	The Decision adopts mandatory customer-notification requirements for future gas price spike events, requires utilities to provide estimated rate-increase and payment-plan information, and requires communications through websites, email/text where consented, and additional public/customer-service channels. Decision at 135-137, 147-	Verified in part. Some related hours are non-compensable as described in Part III.D.

• Mandatory customer notifications upon a defined gas-price-spike trigger; • Multi-channel communications (text, email, bill inserts, social media, voicemails, and website notices); • Mandatory promotion of payment-plan options during high-price events, including minimum requirements for outreach frequency, content, and channels, with targeting by customer class, including small commercial customers; and • Outreach to vulnerable customers and with Community Resource Centers (CRCs) during gas price spikes. SBUA emphasized that small businesses often need timely, actionable information because they have tight margins and limited ability to absorb bill volatility or quickly alter operations. References: Response of Small Business Utility Advocates to Order Instituting Investigation into Natural Gas Prices, Apr. 19, 2023 (Response to OII), at 4-5. Opening Comments of Small Business Utility Advocates on Questions Regarding Potential Relief Measures, June 10, 2024 (Opening Comments on Relief Measures), at 1-3, 5-6. Reply Comments of Small Business Utility Advocates on Questions Regarding Potential Relief Measures, June 21, 2024	149; *id*. at 196-198, Ordering Paragraphs (OP) 4(a)-(b), 5(a)-(b), 6 and 7; *see also id*. at 135 ("we agree with the parties that a multichannel approach is beneficial"). The Decision specifically cites SBUA's positions and advocacy on these points. *See, e.g.*, Decision at 72-73 (SBUA and others recommend utilities provide CRCs), 132-134 (citing SBUA's recommendation for guidelines promoting levelized payment plans during high-price events), 145 (noting that CforAT, SBUA, TURN, and UCAN recommended timely customer notifications). Although the Decision does not require utilities to establish CRCs as such, it adopted the underlying objective by ordering all four respondent gas utilities to coordinate with local governments and health departments and make information on local relief resources available to customers during a gas price spike. *See* Decision at 74-75 (directing utilities to coordinate with local governments and health departments to make relief information available to customers during a gas price spike), 190-191, Conclusion of Law (COL) 9. The Decision does not require utilities to target communications specifically to small commercial customers as SBUA recommended, *see id.* at 134; however, SBUA submits its advocacy on this was reasonable on behalf of small business customers and added to the considerations before the Commission. *See, e.g.*, D.08-04-004 at 4-6.	

(Reply Comments on Relief Measures), at 1-4, 6-7. Opening Comments of Small Business Utility Advocates on Commission's White Paper Investigation into Natural Gas Prices and Resulting Impacts to Energy Market, July 31, 2024 (Opening Comments on White Paper Part I), at 1, 7. Reply Comments of Small Business Utility Advocates on Commission's White Paper Investigation into Natural Gas Prices and Resulting Impacts to Energy Market, Aug. 14, 2024 (Reply Comments on White Paper Part I), at 1-2. Reply Comments of Small Business Utility Advocates on Proposed Decision, Feb. 17, 2026 (Reply Comments on PD), at 4-5.		
2. Mitigation Measures, including Temporary Caps and Amortization SBUA advocated for and supported numerous measures to mitigate future gas price spikes. SBUA's recommendations included: • adoption of a temporary cap on the CPC during defined gas price spike events and of no more than 15 percent above seasonal average; • an accompanying amortization mechanism for any cost imbalances; and • rebuttal of PG&E's argument that the cap should be eliminated. SBUA's advocacy also emphasized that small commercial customers are often constrained in their gas and electricity usage requirements and may be unable to	The Decision adopts a temporary cap on the CPC, finding it reasonable in light of "the extreme burden faced by ratepayers during a gas price spike." D.26-02-058 at 62-63; *see also, id.,* at 190, COL 3, 4; 195, OP 2(a) (capping the CPC at 150 percent above the 10-year average core procurement price for that month, for up to three months). The Decision references SBUA's and others' support for temporary caps. *Id*. at 60 ("CforAT, SBUA, and TURN support a temporary cap."). Although the Commission did not adopt SBUA's 15-percent cap recommendation, SBUA's advocacy contributed to the record and considerations before the Commission. The Decision also refers to SBUA's reply comments on the PD to reject PG&E's argument that the cap should be removed. *Id*. at 160	Verified

respond meaningfully to short-term price signals. **References:** Opening Comments on Relief Measures at 4–5, 7; Reply Comments on Relief Measures at 6. Opening Comments of Small Business Utility Advocates on Proposed Decision, Feb. 12, 2026 (Opening Comments on PD), at 1–3; Reply Comments on PD at 1-3.	("CforAT and TURN, SBUA, and SoCalGas support a cap. … SBUA states that PG&E's argument is speculative and attenuated.").	
3. Storage Capacity and Reporting SBUA addressed gas storage as a structural driver of natural gas price spikes and a key area for prospective ratepayer protection. SBUA's recommendations included: • Public reporting of storage inventory levels by Independent Storage Providers (ISPs) on the ISPs' websites, PG&E's website, and the Commission's website; • Developing new storage capacity; • More granular information on PG&E's Pipe Ranger and SoCalGas's Envoy websites; • Increased minimum pre-winter storage requirements for the major investor-owned utilities, including consideration of stress-tested high-demand winter scenarios; and • Examination of withdrawal protocols and contingency planning for major supply disruptions. References:	The Decision finds that reduced storage supplies contributed to the price spike. Decision at 22; *see also id*. at 174, FOF 24. The Decision also directs ISPs to "to report their monthly storage levels publicly by the 15th of each month." *Id*. at 153; *see id.* at 151 ("Several parties suggest adding additional ISP reporting requirements" and "[a]ccording to SBUA, this information helps stakeholders gain a greater understanding of gas supply issues and make informed decisions about energy usage and costs.") Although the Decision declined to adopt new storage mandates, the Commission considered and analyzed SBUA's storage-inventory proposals. *See, e.g., id*. at 43-45, 157-158. The Decision also directs PG&E and SoCalGas to include base gas volume on Pipe Ranger and Envoy. *Id*. at 149-150; *see also id*. at 189, FOF 163-165.	Verified in part. Some related hours are non-compensable as described in Part III.D.

Response to OII, at 2. Opening Comments on Relief Measures at 1-4, 7-8; Reply Comments on Relief Measures at 4-6. Opening Comments on White Paper I at 1, 3-8; Reply Comments on White Paper I at 1-5. Reply Comments of Small Business Utility Advocates on Staff White Paper Part II, July 25, 2025 (Reply Comments on White Paper Part II), at 1–2. Opening Comments on PD at 3-5; Reply Comments on PD at 3-4.		
4. Market Dynamics, Procurement, and Incentive Mechanisms SBUA addressed market dynamics and procurement issues. SBUA analyzed the factors causing gas price hikes and examined supply, demand, and regulatory drivers of the gas spike; storage operations and withdrawal flexibility; gas-electric market interactions; procurement strategy and hedging; and GCIM/CPIM transparency. SBUA's recommendations included: • Procedural and reporting requirements for PG&E's Core Procurement Incentive Mechanism (CPIM) and SoCalGas's Gas Cost Incentive Mechanism (GCIM), including a uniform shareholder-award approval process and standardized filing deadlines; • More uniform standards for hedging practices and reporting under the GCIM and CPIM; and • Further evaluation of ISP market dynamics, including ownership of	The Decision cites SBUA's support of several adopted procedural reforms. *See* Decision at 92-93 ("PG&E, SBUA, Sierra Club, SoCalGas, and TURN also support a requirement that all utilities follow the same process for Commission approval of the shareholder award"); *id*. at 93 ("PG&E, SBUA, Sierra Club, and TURN support requiring PG&E's annual report to be submitted by a set deadline"). The Decision adopted reforms to increase transparency, alignment, and stakeholder understanding, including requiring GCIM/CPIM descriptions, annual reporting detail, and a PG&E application for shareholder-award approval. *Id*. at 94-96, 198-200, OPs 8-11. The Decision considered SBUA's recommendation that PG&E and SoCalGas procure a comparable minimum coverage ratio of core procurement through a combination of financial and physical hedges within a comparable incentive structure. *See id*. at 82-84. Although	Verified in part. Some related hours are non-compensable as described in Part III.D.

storage capacity, contract pricing, and tariff structures. References: Response to OII at 2-5. Opening Comments on White Paper Part I at 3-8; Reply Comments on White Paper Part I at 3-4. Opening Comments of Small Business Utility Advocates on Staff White Paper Part III, Oct. 31, 2025 (Opening Comments on White Paper Part III), at 2-6. Reply Comments of Small Business Utility Advocates on Staff White Paper Part III, Nov. 14, 2025 (Reply Comments on White Paper Part III), at 1-5.	the Decision declined to prescribe these hedge coverage ratios, it adopted reporting requirements related to physical hedges and benchmark/actual costs as part of the GCIM/CPIM transparency reforms. *Id*. The Decision considers SBUA's support of further evaluation of ISP market dynamics. *See id.* at 170 ("SBUA disagrees with the ISPs' last assertion stating that further examination of ISP market dynamics should occur if the Commission is to evaluate potential structural changes to aggregate storage levels and/or withdrawal protocols"). Based on the record, the Commission found it reasonable to evaluate whether the gas storage market remains competitive. *Id*. at 170; *see also id.* at 192, COL 11.	

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: The Utility Consumers' Action Network, The Utility Reform Network, Center for Accessible Technology, Sierra Club, and Environmental Defense Fund		Noted
d. Intervenor's claim of non-duplication: Many issues in this proceeding affected small business customers, and SBUA participated to ensure that their interests were represented. SBUA solely represents small business customers, whose interests are distinct from those of other intervenors. SBUA's participation did not materially duplicate the work of other parties. SBUA's positions often aligned with consumer parties on broadly applicable ratepayer protections, including		Noted.

customer communications, bill mitigation, caps, amortization, and market/procurement oversight; however, SBUA added value by offering its own proposals and separately evaluating those issues from the perspective of small business customers, who may face bill volatility, cash-flow constraints, and limited ability to reduce usage without significantly affecting operations.	

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: SBUA's requested compensation is reasonable given the complexity and importance of gas price hikes and the three-year investigation. SBUA focused on issues directly relevant to ratepayer protection: utility communications, mitigation measures including temporary caps and amortization, storage issues, and market dynamics and procurement oversight. These issues have significant impacts on small commercial customers, and the Commission adopted several broadly applicable remedies that align with SBUA's advocacy. SBUA's work helped develop the record on the practical impacts of gas price spikes and the need for customer communications and bill-mitigation measures. The cost of SBUA's participation is reasonable when compared to the potential ratepayer benefits of improved notice, reduced bill volatility, and greater oversight of future gas price spike risks.	Noted
b. Reasonableness of hours claimed: SBUA seeks recovery for approximately 169.5 hours of attorney and expert time, as detailed in the attached time sheets, excluding hours associated with compensation billing. The hours claimed are reasonable given the proceeding's three-year span, numerous SBUA filings, and the breadth of complex issues addressed across communications, mitigation measures, storage, procurement, hedging, and incentive mechanisms. SBUA relied on a team of professionals to address key issues in this proceeding. Junior attorney Andrew Pomaville provided research, analysis, and drafting support. Attorney Luke May handled substantial legal analysis and drafting during the later phases of the proceeding, including work on the white papers, proposed decision, market dynamics, procurement, hedging, and incentive-mechanism issues. General Counsel James Birkelund managed the litigation team, assisted with research and drafting, and provided senior legal review and contributions to filings. Mr.	Noted. SBUA's participation contributed in part to the Commission's decision in multiple areas. However, as detailed in Part III, not all hours claimed were reasonably necessary or resulted in a substantial contribution. Accordingly, only efficient, necessary and productive hours

	CPUC Discussion
Birkelund, Mr. May, and Mr. Pomaville were employed by and provided services to SBUA as outside counsel through E&E Law Corp. on a contingency and deferral basis. *See* Attachment 3 (Statement of Work with binding contractual terms). The Commission has previously approved this outside counsel relationship and its associated attorney-client agreement. *See, e.g.*, D.25-12-038, D.25-05-023, D.25-05-021, D.25-04-012, D.25-03-029, and D.25-02-025. Expert Michael Brown, who was hired as an outside consultant, assisted SBUA in analyzing gas market dynamics issues. His work was performed on a deferral basis, and his contract with SBUA is included as Attachment 4. Executive Director Britt Marra and attorney Joseph Tierney also assisted with SBUA's participation in this proceeding in a more limited capacity. Mr. Tierney assisted with SBUA's initial response to the OII and the notice of intent, and Ms. Marra, as SBUA's Executive Director, consulted with counsel on SBUA's advocacy and positions, and assisted with and submitted several 2024 filings and the compensation claim. However, as an exercise of billing discretion and to avoid internal duplication, SBUA is not seeking compensation for their time. SBUA submits that all hours claimed were necessary to its effective participation and were reasonably expended for SBUA to participate in the proceeding.	that directly supported SBUA's verified contributions are compensated.
c. Allocation of hours by issue: SBUA has allocated its hours among the following five issue areas, as reflected in the timesheets attached as Attachment 2. Issue 1 — Utility Communications to Customers: 22.5 hours; 13.3% Issue 2 — Mitigation Measures: Temporary Caps and Amortization: 17.5 hours; 10.3% Issue 3 — Storage Capacity and Reporting: 44.7 hours; 26.4% Issue 4 — Market Dynamics, Procurement, and Incentive Mechanisms: 77.2 hours; 45.5% Issue 5 — General Participation: 7.6 hours; 4.5%	Noted; totals 100%

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Andrew Pomaville	2024	47.15	$150	Res. ALJ-393; *see* Comment #1 below.	$7,072.50	20.00[1]	$150.00 [2, 3]	$3,000.00
Luke May	2025	31.3	$495	D.25-05-023 setting 2023 rate at $450, escalated by 4.07% for 2024 and 3.46% for 2025.	$15,493.50	19.30 [4]	$495.00 [3,5]	$9,553.50
Luke May	2026	23.5	$510	As above, escalated by 3.35% for 2026.	$11,985.00	23.50	$510.00 [3,5]	$11,985.00
Michael Brown	2023	10.5	$310	D.25-05-023	$3,255.00	0 [6]	N/A [7]	$0.00
James Birkelund	2023	13.65	$770	D.24-10-025	$10,510.50	11.50 [8]	$770.00 [3,9]	$8,855.00
James Birkelund	2024	25.25	$800	D.25-03-021	$20,200.00	25.25	$800.00 [3,9]	$20,200.00
James Birkelund	2025	10	$830	D.25-07-036	$8,300.00	10.00	$830.00 [3,9]	$8,300.00
James Birkelund	2026	8.15	$860	As above, escalated by 3.35% for 2026.	$7,009.00	8.15	$860.00 [3,9]	$7,009.00
					Subtotal: $83,825.50			***Subtotal: $68,902.50***
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
James Birkelund	2023	1.5	$335	50% of 2023 rate.	$502.50	1.50	$335.00 [3,9]	$502.50
James Birkelund	2026	12	$430	50% of 2026 rate.	$5,160.00	6.00 [10]	$430.00 [3,9]	$2,580.00

CLAIMED	CPUC AWARD
Subtotal: $5,662.50	***Subtotal: $3,082.50***
TOTAL REQUEST: $89,488.00	***TOTAL AWARD: $71,985.00***

*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**
James M. Birkelund	March 2000	206328	No
Luke May	Admitted (Oregon 2012)	OR Bar No. 121174	No

C. Attachments Documenting Specific Claim and Comments on Part III[3]:

Attachment or Comment #	Description/Comment
Comment 1	2024 Hourly Rate for Attorney Andrew Pomaville The Commission has established that a law graduate who has not yet been admitted to a state bar should be compensated at paralegal rates under Resolution ALJ-393. Mr. Pomaville graduated from law school in May 2023; however, at the time of his work in this proceeding, he had not yet been admitted to a state bar. His resume is included as Attachment 5. Based on these factors, SBUA seeks an hourly rate of $150 for Mr. Pomaville's 2024 work as an outside paralegal with E&E Law Corp. This request aligns with Resolution ALJ-393 and Commission precedent regarding compensation for attorney work performed before bar admission. *See, e.g.,* D.24-08-053 at 19-20 (setting attorney rate for work during pre-BAR admittance as a paralegal rate).
Attachment 1	Certificate of Service (*see* attachment under separate cover)

[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.

Attachment or Comment #	Description/Comment
Attachment 2	Time Sheet Records with Allocation of Hours by Issue
Attachment 3	Statement of Work for E&E Law
Attachment 4	Contract with Expert Michael Brown
Attachment 5	Resume for Attorney Andrew Pomaville

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Reduction of Hours for Andrew Pomaville in 2024	*Excessive, Inefficient Hours* Public Utilities Code §1802(j) provides that a substantial contribution is one that "has substantially assisted the commission in the making of its order or decision." In determining whether SBUA made such a contribution, we must also assess whether the hours claimed are reasonable and commensurate with the value of that contribution. Making a substantial contribution does not entitle an intervenor to all of its claimed fees and costs; compensation is awarded only for efficient and meaningful participation. SBUA claims 47.15 hours for Andrew Pomaville's preparation of two filings: Opening Comments submitted on July 31, 2024, and Reply Comments submitted on August 14, 2024. Each filing was approximately five pages in length, with limited comments that were not always unique as they mirrored or aligned with many other parties' comments. The hours claimed are excessive and disproportionate to the reasonable amount of effort required to prepare documents of this size and scope, and in light of the narrow impact it had. Excessiveness occurs when the time claimed is out of proportion to what would reasonably be required for the contribution made. The burden of proof is on the intervenor to demonstrate that each hour claimed was spent productively making a substantial contribution to the decision. In this instance, SBUA has not justified why preparing two short filings required more than forty-seven hours of work. The reductions made here are not based solely on the length of the documents, but on the inefficiencies and the excessive time spent producing them. Accordingly, we reduce Andrew Pomaville's claimed hours and approve 20 hours for this work, which is commensurate with the level of contribution provided.
[2] Andrew Pomaville's	SBUA has confirmed that Andrew Pomaville is a consultant. Pursuant to Commission policy, the rate requested by an intervenor must not exceed the rate billed to that intervenor by any outside consultant it hires, even if the

Item	Reason
2024 Hourly Rate	consultant's billed rate is below the floor for a given experience level.[4] Per the IComp Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§ 1804(d)). SBUA has confirmed that per the terms of their contract, Andrew Pomaville has been hired on a contingency rate basis, meaning that Andrew Pomaville has agreed to defer the 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 Andrew Pomaville's experience as a Legal - Paralegal – II. Given that the 2024 rate range for Legal - Paralegal – II is $118.29 to $179.25, we find a 2024 hourly rate of $150.00 to be reasonable and we adopt it here. The award determined herein for Andrew Pomaville's contribution in this proceeding shall be paid in full to Andrew Pomaville, and no portion of this part of this award shall be kept by SBUA. 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.
[3] Contingency Rate Disclaimer	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 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

[4] D.07-01-009, D.08-04-010, and ALJ Resolution ALJ 235.

Item	Reason
	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.
[4] Reduction of Hours for Luke May in 2025	*Excessive, Inefficient Hours* May claims 25.00 hours for work on two documents related to the Whitepaper, 6-page comments on 10/31/2025 and the 5-page reply comments on 11/14/2025. We find this excessive and inefficient given that the filings did not include any new technical analysis, data review, modeling, or complicated evaluation that would reasonably require multiple full-day drafting sessions. The hours claimed are disproportionate to the length and complexity of the filings, and the limited impact it had on the Commission's decision-making process. Accordingly, we reduced a total of 12.00 hours from this effort.
[5] Luke May's 2025-2026 Hourly Rate	SBUA has confirmed that Luke May is a consultant. Pursuant to Commission policy, the rate requested by an intervenor must not exceed the rate billed to that intervenor by any outside consultant it hires, even if the consultant's billed rate is below the floor for a given experience level.[5] Per the IComp Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§ 1804(d)). SBUA has confirmed that per the terms of their contract, Luke May has been hired on a contingency rate basis, meaning that Luke May has agreed to defer the 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 Luke May's experience as a Legal – Attorney – III. Given that the 2025 rate range for Legal - Attorney – III is $376.79 to $586.51, we find a 2025 hourly rate of $495.00 to be reasonable and we adopt it here. Given that the 2026 rate range for Legal - Attorney – III is $392.90 to $602.62, we find a 2026 hourly rate of $510.00 to be reasonable and we adopt it here. The award determined herein for Luke May's contribution in this proceeding shall be paid in full to Luke May, and no portion of this part of the award shall be kept by SBUA. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor,

[5] D.07-01-009, D.08-04-010, and ALJ Resolution ALJ 235.

Item	Reason
	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.
[6] Reduction of Hours for Michael Brown in 2023	*Lack of Substantial Contribution* Public Utilities Code § 1802(j) states that a substantial contribution "has substantially assisted the commission in the making of its order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer." In our determination that SBUA contributed, we also evaluate whether the hours claimed were commensurate with the contributions made. Making a substantial contribution in and of itself does not entitle an intervenor to all its claimed fees and costs. Compensation is granted for efficient, meaningful contributions. SBUA claims 10.5 hours for work performed by expert Michael Brown on October 2 and 3, 2023. These hours were billed as research and drafting a memo intended to respond to the Assigned Commissioner's September 11, 2023 ruling. However, SBUA did not file any reply or response to that ruling, and the work performed by Michael Brown is not on the record. Because the research for the memo was not used to file a response to the Assigned Commissioner's September 11, 2023 ruling, the Commission cannot conclude that this work substantially assisted the Commission in its decision making process. Work that does not result in a filing or otherwise contribute to the record does not meet the statutory definition of a "substantial contribution," nor does it satisfy the requirement that hours claimed be reasonably necessary or productive. Because SBUA's efforts were excessive and were not sufficiently contributory, we reduce 10.5 hours from Michael Brown's claimed time, as it appropriately acknowledges the value of SBUA's contributions. Although the Commission will compensate intervenors regardless of whether their positions are adopted, SBUA's input related to this work had minimal influence on the decision-making process. The award granted herein is commensurate with that level of contribution.
[7] Michael Brown's 2023 Hourly Rate	Because all of Michael Brown's 2023 hours are disallowed due to lack of contribution, the Commission does not adopt an hourly rate for Mr. Brown in this proceeding. Rate determinations are made only for representatives whose hours warrant compensation.
[8]	*Lack of Substantial Contribution*

<table>
<tr><th>Item</th><th>Reason</th></tr>
<tr><td>Reduction of Hours for James Birkelund in 2023</td><td>Public Utilities Code § 1802(j) states that a substantial contribution “has substantially assisted the commission in the making of its order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer.” In our determination that Small Business Utility Advocates (SBUA) made a contribution, we also evaluate whether the hours claimed were commensurate with the contributions made. Making a substantial contribution in and of itself does not entitle an intervenor to all its claimed fees and costs. Compensation is granted for efficient, meaningful contributions.

SBUA claims time for General Counsel James Birkelund in September 2023 associated with reviewing the Assigned Commissioner’s September 11, 2023 ruling directing responses. However, SBUA did not file any response or reply to that ruling in the docket. Because the research and review activities did not result in any filing or entering the record, they did not assist the Commission in the making of its decision and therefore do not meet the statutory definition of a substantial contribution. Work that does not culminate in a submission to the record, or otherwise contribute to the Commission’s deliberations, is not considered productive or compensable under Pub. Util. Code §§ 1802(j) and 1803.Accordingly, we reduce 2.15 hours associated with Birkelund’s review of the 9/11/2023 ruling.

<table>
<tr><th>Description</th><th>Date</th><th>Time</th></tr>
<tr><td>Rev ALJ ruling directing responses to addn Qs re prep for Winter 2023-24.</td><td>9/11/2023</td><td>0.40</td></tr>
<tr><td>Rev responses to Assgn Cmmr Qs re prep for Winter 2023-24.</td><td>9/27/2023</td><td>0.75</td></tr>
<tr><td>Rev memo from expert M. Brown on market and natural gas spikes.</td><td>10/4/2023</td><td>1.00</td></tr>
</table>
</td></tr>
<tr><td>[9] James Birkelund’s 2023-2026 Hourly Rate</td><td>Upon further review, the Commission has determined that James Birkelund is a consultant. Pursuant to Commission policy, the rate requested by an intervenor must not exceed the rate billed to that intervenor by any outside consultant it hires, even if the consultant’s billed rate is below the floor for a given experience level.[6]

Per the IComp Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). The Commission requested supplemental documentation be submitted by SBUA to confirm the rate charged by James Birkelund. SBUA confirms that per the terms of their contract, James Birkelund has been hired</td></tr>
</table>

[6] D.07-01-009, D.08-04-010, and ALJ Resolution ALJ 235.

Item	Reason
	on a contingency basis, meaning that 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 James Birkelund's experience. Given that the 2023 rate range for Legal - Legal Director - IV is $518.55 to $832.67, we find the requested 2023 hourly rate of $770 to be reasonable and we adopt it here. Given that the 2024 rate range for Legal - Legal Director - IV is $545.91 to $860.03, we find the requested 2024 hourly rate of $800 to be reasonable and we adopt it here. Given that the 2025 rate range for Legal - Legal Director - IV is $570.12 to $884.24, we find the requested 2025 hourly rate of $830 to be reasonable and we adopt it here. Given that the 2026 rate range for Legal - Legal Director - IV is $594.36 to $908.48, we find the requested 2026 hourly rate of $860 to be reasonable and we adopt it here. The award made herein for the consultant's contribution in this proceeding 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 be forthcoming about engaging consultants and the terms of the contract, to adhere to the Commission's policy on compensation for consultant fees, and 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, SBUA did not provide all the documentation pertaining to the contract terms between SBUA and James Birkelund in the initial claim and waited until the Commission requested supplemental documentation which delays the processing of the claim.
[10] Excessive IComp Claim Prep Hours	James Birkelund claimed 12.00 hours in 2026 for preparation of the intervenor compensation request. While the claim was detailed, organized, and generally compliant with Commission requirements, we find the preparation hours excessive given the scope of issues and overall scale of the request.

Item	Reason
	James Birkelund has significant experience practicing before the Commission and preparing similar claims, and we would expect greater efficiency in compiling this request. Accordingly, we reduce the claimed hours by 6.00 hours, awarding 6.00 hours for claim preparation in 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 (*see* Rule 14.6(c)(6))?	Yes

FINDINGS OF FACT

1. Small Business Utility Advocates has made a substantial contribution in some aspects to D.26-02-058.

2. The requested hourly rates for Small Business Utility Advocates' representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services and/or reflect the actual rates billed to, and paid by Small Business Utility Advocates, for consultant services rendered.

3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.

4. The total of reasonable compensation is $71,985.00.

CONCLUSION OF LAW

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

ORDER

1. Small Business Utility Advocates is awarded $71,985.00.

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 Small Business Utility Advocates 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 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 Small Business Utility Advocates' request, and continuing until full payment is made.

3. The comment period for today's decision is waived.

   This decision is effective today.

   Dated _____, at Sacramento, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		**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
Small Business Utility Advocates	May 4, 2026	$89,488.00	$71,985.00	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
Andrew	Pomaville	Consultant	$150	2024	$150
Luke	May	Consultant	$495	2025	$495
Luke	May	Consultant	$510	2026	$510
Michael	Brown	Consultant	$310	2023	N/A
James	Birkelund	Consultant	$770	2023	$770
James	Birkelund	Consultant	$800	2024	$800
James	Birkelund	Consultant	$830	2025	$830
James	Birkelund	Consultant	$860	2026	$860

(END OF APPENDIX)