

~~Decision~~Decision **PROPOSED DECISION OF ADMINISTRATIVE LAW JUDGE ROBYN A. PURCHIA (Mailed 10/19/2026)****BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

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 THE UTILITY REFORM NETWORK
FOR SUBSTANTIAL CONTRIBUTION TO DECISION 26-05-058**

Intervenor: The Utility Reform Network (TURN)	For contribution to D.26-02-058
Claimed: \$72,956.25	Awarded: ~~\$66,648.75~~ <u>\$66,858.75</u>
Assigned Commissioner: Karen Douglas	Assigned ALJ: Robyn Purchia

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	In D.26-02-058, the Commission determined that the 2022–2023 gas price spike was caused by prolonged below-normal temperatures and high precipitation levels, interstate pipeline constraints, reduced natural gas flows, reduced storage supplies, and bidweek events, and found that California gas public utilities, their procurement divisions, and Independent Storage Providers did not take improper or intentional actions that caused or contributed to the spike, while adopting measures to mitigate future impacts on ratepayers, including requiring gas utilities to cap the Core Procurement Charge, amortize any resulting undercollection, provide timely customer notice during defined gas price spike events, enhance transparency and oversight of procurement incentive mechanisms, incorporate lessons learned into procurement and hedging strategies, and require Independent Storage Providers to publicly report 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:	5/16/2023	Verified
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:	A.23-06-008	The 3/20/2024 Ruling in A.23-06-008 addresses TURN's showing of significant financial hardship, not eligible customer status.
6. Date of ALJ ruling:	3/20/2024	5/31/2022. TURN's eligibility is supported by the 5/31/2022 ALJ Ruling in A.21-12-007 establishing the rebuttable presumption.
7. Based on another CPUC determination (specify):	N/A	TURN's eligibility was established by the 5/31/2022 Ruling in A.21-12-007, which provides the applicable rebuttable presumption.
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:	A.23-06-008	Verified
10. Date of ALJ ruling:	3/20/2024	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

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

	Intervenor	CPUC Verification
14. Date of issuance of Final Order or Decision:	3/5/2026	Verified
15. File date of compensation request:	5/4/2026	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
<u>1. Gas Price Spike Event Definition</u> TURN recommended using a specific increase in customer bills to define a gas price spike event, primarily recommending that customer notification requirements be in place if gas prices reach a level that, if sustained, would result in a monthly increase of \$20.00 relative to the average monthly residential winter usage over the prior five years, excluding any climate or other credits. TURN also noted that using the average winter maximum is essential because the usage on which investor-owned utilities (IOUs) base their bill calculations varies significantly from winter averages. The Commission found it reasonable to base the threshold on gas prices and the associated bill impact, rather than potential savings from electrification and defined a gas price spike as a 150 percent increase in the monthly core procurement price relative to the 10-year average core procurement price for that month during the winter season (November-March).	• D.26-02-058, pp. 55-56. • TURN Opening Comments, p. 1. • TURN Reply Comments, p. 3. • D.26-02-058, pp. 57-58.	Verified
<u>2. Cap on Core Procurement Charge</u> TURN supported a temporary cap and noted that the level at which a cap was placed would need to be carefully balanced against the impact of future recoveries.	• D.26-02-058, p. 60. • TURN Reply Comments, p. 7.	Verified

The Commission found that given the extreme burden faced by ratepayers during a gas price spike, it is reasonable to provide bill relief, even if it may mute the full extent of price signals. The Commission authorized PG&E, SoCalGas, SDG&E, and Southwest Gas to impose a temporary cap on the CPC, and gas utilities shall only impose the temporary cap on the CPC during gas price spikes that occur during the winter months (November-March), which is set at 150 percent above the 10-year average core procurement price for that month.	• D.26-02-058, pp. 62-63.	
<u>3. Community Resource Centers</u> TURN recommended that utilities be required to provide community resource centers (“CRCs”) during winter gas price events to ensure that the most vulnerable members of the community have access to utility services, including hot water for sanitation and resources to prepare food. The Commission recognized that CRCs could provide relief to vulnerable Californians during a gas price spike, such as access to hot showers, warmth, and food preparation. However, instead of ordering the utilities to provide CRCs, the Commission ordered the utilities 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.	• D.26-02-058, pp. 72-73. • TURN Opening Comments, p. 9. • D.26-02-058, pp. 74-75.	Verified
<u>4. Transparency and Reporting Requirements</u> TURN supported having the utilities submit Tier 1 advice letters updating their Preliminary Statements to describe all aspects of core procurement incentive mechanisms and requiring all utilities follow the same process for Commission approval of the shareholder award. The Commission agreed that greater transparency, alignment, and understanding could mitigate harm to ratepayers should gas price spikes recur. The Commission ordered the utilities to submit advice letters to describe all aspects of their core procurement incentive	• D.26-02-058, pp. 92-93. • TURN Opening Comments on White Paper, pp. 2-3, 6.	Verified

mechanisms, identify gains and excess costs from physical gas hedges, and requiring PG&E to file an application to receive approval of shareholder award each year.	• D.26-02-058, pp. 94-95.	
<u>5. Notifying Customers in Advance of Gas Price Spikes</u> TURN emphasized the importance of notifying customers in advance of gas price spikes and letting customers know how much essential energy services will cost each month. TURN noted that website visits during the gas price spike clearly show that customers were “searching desperately for actions their households could take to mitigate these unexpected increases in monthly costs.” The Commission agreed with TURN that gas utilities must inform customers of rising prices before customers receive their bills. Also, the Commission determined that it is reasonable to expect gas utilities to make transparent and relevant information accessible to their customers so customers can prepare accordingly. TURN also suggested that the Commission require utilities to notify customers if gas commodity costs or bills reach a certain threshold, improvements to communications regarding payment plans, communicate across multiple channels and languages. The Commission agreed that increased communication on payment plan options is beneficial during gas price spikes. The Commission directed all gas utilities to, at a minimum, notify customers of the price spike and inform them of payment plan options and the Commission’s CHANGES program, and communicate payment plan options to customers in a transparent manner. The Commission also agreed that a multichannel approach is beneficial. TURN also recommend that utilities timely notify their customers in the event of a gas price spike. The Commission agreed that gas customers notified of a gas price spike, as defined in this decision, can access information to reduce their	• D.26-02-058, pp. 118-120. • TURN Reply Comments, p. 2. • D.26-02-058, pp. 119-121. • D.26-02-058, pp. 131-133. • TURN Opening Comments, pp. 1, 5-6 • TURN Reply Comments, p. 3. • D.26-02-058, pp. 135-136. • D.26-02-058, p. 145.	Verified

demand and enroll in payment plans and assistance programs. Thus, the Commission directed gas utilities to provide communication to customers in the event of a gas price spike including electronic alerts, scripts for customer service representatives, and other channels.	• TURN Reply Comments, pp. 1-3. • D.26-02-058, pp. 147-148.	
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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?²	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: CforAT, UCAN		Noted
d. Intervenor's claim of non-duplication: TURN coordinated with other intervenors throughout the proceeding to avoid duplicative efforts. TURN presented analysis and recommendations, alongside other intervenors, addressing what constitutes a gas spike event, and what consumer notifications and protections should apply when such an event occurs. TURN also filed joint pleadings with other intervenors when possible to reduce duplicative efforts – for example, joint opening and reply comments with CforAT. The Commission should find that TURN's participation was efficiently coordinated with the participation of Cal Advocates so as to avoid undue duplication and to ensure that to the extent duplication occurred, it served to supplement, complement, or contribute to the showing of the other intervenor. And consistent with such a finding, the Commission should determine that all of TURN's work is compensable consistent with the conditions set forth in Section 1802.5.		Noted

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

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: TURN's request for intervenor compensation seeks an award of approximately \$73,000.00 as the reasonable cost of our participation in this proceeding. TURN submits that these costs are reasonable in light of the importance of the issues TURN addressed.	Noted

² The Office of Ratepayer Advocates was renamed the Public Advocate's Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

As noted above, TURN’s involvement ensured that the Commission closely examined what constitutes a gas spike event in the future and what consumer notifications and protections should be provided when such an event occurs, including whether there should be a cap on the gas charges, reporting and notification requirements, and others. These are important public policy questions that will affect many utility customers, with particularly large impact on low-income customers that cannot afford a sudden spike in their gas bills due to a gas price spike event. For these reasons, the Commission should find that TURN's efforts have been productive and the requested amount of compensation is reasonable in light of the benefits achieved through those efforts.													
b. Reasonableness of hours claimed: This Request for Compensation includes around 139 hours of TURN’s attorney and expert time, the equivalent of less than 4 weeks of full-time work for an individual attorney. TURN’s efforts reflected herein resulted in significant contributions to D.26-02-058, detailed above, and encompass the preparation of several filings by TURN. TURN assigned this proceeding to Staff Attorney David Cheng and Policy Expert Jennifer Dowdell. This request for compensation includes approximately 65 hours of Mr. Cheng’s time and 74 hours of Ms. Dowdell’s time. TURN suggests that the Commission should find that the number of issues addressed by TURN in this proceeding, the time necessary for preparing various pleadings warrant finding that the hours spent were reasonable. However, should the Commission believe that more information is needed or that a different approach to discussing the reasonableness of the requested hours is warranted here, TURN requests the opportunity to supplement this section of the request.	Noted												
c. Allocation of hours by issue: TURN has allocated all of our attorney and expert time by issue area or activity, as is evident on our attached timesheets (Attachment 2) and in Attachment 3, which shows the allocation of TURN’s time included in this request by attorney or expert and issue / activity area. The following codes relate to specific substantive issue and activity areas addressed by TURN. <table><tr><th>Code</th><th>Description</th><th>Allocation of Time</th></tr><tr><td>AL</td><td>Work related to reviewing relevant advice letters</td><td>0.2%</td></tr><tr><td>Coord</td><td>Time spent coordinating with other parties regarding issues, procedural items, including preparing joint filings with all parties</td><td>0.9%</td></tr><tr><td>GH</td><td>Work related preparing for or participating in PHC and other hearings</td><td>1.4%</td></tr></table>	Code	Description	Allocation of Time	AL	Work related to reviewing relevant advice letters	0.2%	Coord	Time spent coordinating with other parties regarding issues, procedural items, including preparing joint filings with all parties	0.9%	GH	Work related preparing for or participating in PHC and other hearings	1.4%	Noted
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GH	Work related preparing for or participating in PHC and other hearings	1.4%											

GP	Work related to general participation in this proceeding (document review, case review, and others)	16.0%	
PD	Work related to the Proposed Decision where not easily allocated to specific issue areas	5.0%	
Spike	Work related to defining a gas price spike event, developing necessary notifications and consumer protections or mitigations for the price spike	76.4%	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
David Cheng, TURN Attorney	2023	21.25	\$480.00	D.24-02-043	\$10,200.00	21.25	\$480.00 [1]	\$10,200.00
David Cheng, TURN Attorney	2024	22.50	\$525.00	D.24-07-030	\$11,812.50	22.50	\$525.00 [1]	\$11,812.50
David Cheng, TURN Attorney	2025	14.00	\$570.00	D.25-06-064	\$7,980.00	14.00	\$570.00 [1]	\$7,980.00
David Cheng, TURN Attorney	2026	3.25	\$620.00	Res. ALJ-393, 2025 rate plus 3.35% COLA and 5% step increase; <i>See</i> Comment 1	\$2,015.00	3.25	~~\$590.00~~ <u>\$620.00</u> [1]	~~\$1,917.50~~ <u>\$2,015.00</u>
Jennifer Dowdell, TURN Energy Policy Expert	2023	24.25	\$455.00	D.24-09-016	\$11,033.75	24.25	\$455.00 [2]	\$11,033.75
Jennifer Dowdell, TURN Energy Policy Expert	2024	37.00	\$495.00	D.25-01-053	\$18,315.00	33.50 [3]	\$495.00 [2]	\$16,582.50
Jennifer Dowdell, TURN Energy Policy Expert	2025	12.50	\$510.00	Res. ALJ-393, 2024 rate plus 3.46% COLA	\$6,375.00	8.50 [4]	\$510.00 [2]	\$4,335.00
Marcel Hawiger, TURN Attorney	2025	0.50	\$790.00	D.25-06-063	\$395.00	0.50	\$790.00 [5]	\$395.00

CLAIMED						CPUC AWARD		
Subtotal: \$70,451.25						Subtotal: ~~\$64,256.25~~ <u>64,353.75</u>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
David Cheng, TURN Attorney	2023	0.75	\$240.00	50% of 2023 Hourly Rate	\$180.00	0.75	\$240.00 [1]	\$180.00
David Cheng, TURN Attorney	2026	7.50	\$310.00	50% of 2026 Hourly Rate	\$2,325.00	7.50	~~\$295.00~~ <u>310.00</u> [1]	\$2,212.50
Subtotal: \$2,505.00						Subtotal: ~~\$2,392.50~~ <u>2,505.00</u>		
TOTAL REQUEST: \$72,956.25						TOTAL AWARD: ~~\$66,648.75~~ <u>66,858.75</u>		

*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. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

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

ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ³	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
David Cheng	June 2015	303794	No
Marcel Hawiger	January 1998	194244	No

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

Attachment or Comment #	<u>TURN's</u> Description/Comment
Attachment 1	Certificate of Service

³ This information may be obtained through the State Bar of California's website at <https://apps.calbar.ca.gov/attorney/LicenseeSearch/QuickSearch>.

⁴ ~~Attachments~~ TURN's attachments not included in the final Decision.

Attachment or Comment #	TURN's Description/Comment
Attachment 2	Timesheets for TURN Attorneys/Experts
Attachment 3	TURN hours allocated by issue
Comment #1	2026 Rate for David Cheng TURN requests an hourly rate of \$620.00 for TURN Attorney David Cheng in 2026. The requested rate is equal to the rate authorized by the Commission in D.25-06-064 for Mr. Cheng's work in 2025, \$570.00, adjusted by both (1) an escalation rate of 3.35% for 2026, and (2) the second 5% step increase in the Attorney – Level IV experience tier. Calculation: $\\$570.00 \times [1.0335 \text{ (COLA)} + 0.05 \text{ (step increase)}] = \\$617.60$, rounded to \$620.00. Res. ALJ-393 permits intervenor representatives to claim up to two 5% annual “step increases” within each labor role experience tier, as long as their final requested rate does not exceed the maximum approved rate for that experience level. (Res. ALJ-393, p. 5). Applying COLA and the second step increase results in an hourly rate of \$620.00 for Mr. Cheng in 2026.
Comment #2 ⁵	
Comment #3 ⁶	

~~C.~~ [D.](#) CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] David Cheng's 2023-2026 Hourly Rate	D.24-02-043 approved the 2023 hourly rate of \$480.00 for David Cheng as a Legal - Attorney - III. As Intervenor Compensation Claim Preparation hours are compensated at ½ preparer's normal hourly rate, we apply the rate of \$240.00 in 2023. D.24-06-021 approved the 2024 hourly rate of \$525.00 for David Cheng as a Legal - Attorney – IV. D.25-06-064 approved the 2025 hourly rate of \$570.00 for David Cheng as a Legal - Attorney - IV. ~~TURN requests an hourly rate of \$620.00 for David Cheng in the role of Attorney - IV. We note TURN's requested hourly rate is based~~

⁵ [Comment #2 left blank by TURN.](#)

⁶ [Comment #3 left blank by TURN.](#)

Item	Reason
	~~on the 2026 escalation rate and a requested second step increase as an Attorney – IV.~~ ~~David Cheng has already received the two allowable step increases in the role of Attorney – IV, with D.24-06-021 awarding the first step increase in recognition in the role change to Attorney – IV and D.25-06-064 awarding the second step increase.~~ ~~D.25-06-064 approved the rate of \$570.00 in 2025.~~ For 2026 ~~hourly rate~~, the Commission applies the annual escalation methodology adopted in Resolution ALJ-393, which is a percent change of 3.35%. With a 2025 rate of \$570.00 ~~previously established, and based on the an~~ escalation factor of 3.35%, <u>and the second 5% step increase in the Legal – Attorney – IV experience tier, we approve</u> a 2026 rate of <u>\$590.00 is calculated, rounded to the nearest five dollars</u> <u>620.00</u>. ~~As~~ Intervenor Compensation Claim Preparation hours are compensated at ~~1/2~~ <u>half the</u> preparer's ~~normal~~ <u>standard</u> hourly rate, ~~we apply the~~ <u>resulting in a 2026 preparation</u> rate of <u>\$295.00 in 2026</u> <u>310.00 for Cheng</u>.
[2] Jennifer Dowdell's 2023-2025 Hourly Rate	D.24-09-016 approved the 2023 hourly rate of \$455.00 for Jennifer Dowdell as an Expert - Public Policy Analyst – IV. D.25-01-053 approved the 2024 hourly rate of \$495.00 for Jennifer Dowdell as an Expert - Public Policy Analyst – IV. D.25-01-053 previously approved the rate of \$495.00 for Dowdell in 2024. For Dowdell's 2025 hourly rate, the Commission applies the annual escalation methodology adopted in Resolution ALJ-393, which is a percent change of 3.46%. With a 2024 rate of \$495.00 previously established for Dowdell, and based on the escalation factor of 3.46%, a 2025 rate of \$510.00 is calculated, rounded to the nearest five dollars.
[3] Reduction of Hours for Jennifer Dowdell in 2024	<u>Excessive Hours</u> While these arguments were helpful, the number of hours claimed is excessive relative to their impact. Excessive hours occur when the Commission determines that the time claimed is disproportionate to the reasonable amount of effort required for the contribution. Intervenor bears the burden of demonstrating that each hour claimed was spent productively and contributed meaningfully to the decision; however, TURN did not provide sufficient justification for the level of effort claimed here.

Item	Reason									
	In assessing whether hours are reasonable, the Commission considers both the substance and complexity of the filing and its length. Although page count alone does not determine the quality or impact of a submission, it is one factor in evaluating whether the time claimed is proportional to the work produced. In this instance, the 06/10/2024 opening comments totaled approximately 10 pages and did not include new technical analysis, data review, modeling, or other complex work that would reasonably require multiple full-day drafting sessions. Accordingly, the hours claimed appear disproportionate to the filing’s limited length and moderate complexity. The hours claimed, particularly the 8.25-hour and 7.25-hour drafting entries on 6/7/2024 and 6/8/2024, are not supported by the complexity or depth of the filing. The document’s limited scope, absence of technical content, and reliance on previously developed arguments indicate that the work could have been completed in significantly less time. Therefore, the reductions made here are not based solely on page length, but on the apparent inefficiencies and disproportionate time spent relative to the nature of the filing. For these reasons, we reduce a total of 3.50 hours from the entries below. <table><tr><th>Description</th><th>Date</th><th>Time</th></tr><tr><td>Draft comments</td><td>6/7/2024</td><td>8.25</td></tr><tr><td>Draft comments</td><td>6/8/2024</td><td>7.25</td></tr></table> The total number of reductions for Jennifer Dowdell is 3.80 hours, leaving 33.20 hours approved for compensation in 2024.	Description	Date	Time	Draft comments	6/7/2024	8.25	Draft comments	6/8/2024	7.25
Description	Date	Time								
Draft comments	6/7/2024	8.25								
Draft comments	6/8/2024	7.25								
[4] Reduction of Hours for Jennifer Dowdell in 2025	<u>Excessive Hours</u> While these arguments were helpful, the number of hours claimed is excessive relative to their impact. Excessive hours occur when the Commission determines that the time claimed is disproportionate to the reasonable amount of effort required for the contribution. Intervenors bear the burden of demonstrating that each hour claimed was spent productively; however, TURN did not provide sufficient justification for the level of effort claimed here. In assessing whether hours are reasonable, the Commission considers both the substance and complexity of the filing and its length. Although page count alone does not determine the quality or impact of a submission, it is one factor in evaluating whether the time claimed is proportional to the work produced. In this case, the 10/31/2025 opening comments totaled approximately six pages and									

Item	Reason												
	did not include new technical analysis, data review, modeling, or other complex work that would reasonably require multiple full-day drafting sessions. Thus, the hours claimed appear disproportionate to the filing’s length and complexity. The hours claimed, particularly the 6.00-hour drafting entry on 10/27/2025, are not supported by the complexity or depth of the filing. The document’s limited scope, absence of technical content, and reliance on previously developed arguments indicate that the work could have been completed in significantly less time. Accordingly, the reductions made here are not based solely on page length, but on apparent inefficiencies and disproportionate time spent relative to the nature of the filing. For these reasons, we reduce a total of 4.00 hours from the entries below. <table><tr><th>Description</th><th>Date</th><th>Time</th></tr><tr><td>Draft comments</td><td>10/26/2025</td><td>2.00</td></tr><tr><td>Draft comments</td><td>10/27/2025</td><td>6.00</td></tr><tr><td>Further Draft comments incorporating feedback</td><td>10/28/2025</td><td>3.00</td></tr></table>	Description	Date	Time	Draft comments	10/26/2025	2.00	Draft comments	10/27/2025	6.00	Further Draft comments incorporating feedback	10/28/2025	3.00
Description	Date	Time											
Draft comments	10/26/2025	2.00											
Draft comments	10/27/2025	6.00											
Further Draft comments incorporating feedback	10/28/2025	3.00											
[5] Marcel Hawiger’s 2025 Hourly Rate	D.25-06-063 approved the 2025 hourly rate of \$790.00 for Marcel Hawiger as a Legal - Attorney - V.												

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. The Utility Reform Network has made a substantial contribution to D.26-02-058.
2. The requested hourly rates for The Utility Reform Network's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$~~66,648.75~~66,858.75.

CONCLUSION OF LAW

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

ORDER

1. The Utility Reform Network is awarded \$~~66,648.75~~66,858.75.
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 The Utility Reform 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 The Utility Reform 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 _____, at San Francisco, 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
The Utility Reform Network	May 4, 2026	\$72,956.25	~~\$66,648.75~~ <u>\$66,858.75</u>	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
David	Cheng	Attorney	\$480.00	2023	\$480.00
David	Cheng	Attorney	\$525.00	2024	\$525.00
David	Cheng	Attorney	\$570.00	2025	\$570.00
David	Cheng	Attorney	\$620.00	2026	~~\$590.00~~ <u>\$620.00</u>
Jennifer	Dowdell	Expert	\$455.00	2023	\$455.00
Jennifer	Dowdell	Expert	\$495.00	2024	\$495.00
Jennifer	Dowdell	Expert	\$510.00	2025	\$510.00
Marcel	Hawiger	Attorney	\$790.00	2025	\$790.00

(END OF APPENDIX)

Summary report: Litera Compare for Word 11.6.0.100 Document comparison done on 10/28/2026 8:56:26 AM	
Style name: Default Style	
Intelligent Table Comparison: Active	
Original filename: OROGINAL I.23-03-008 ICOMP TURN RPC Agenda 10-8-2026.docx	
Modified filename: (Rev. 1) I.23-03-008 ICOMP TURN RPC Agenda 10-29-2026.docx	
Changes:	
<u>Add</u>	34
~~Delete~~	29
~~Move From~~	0
<u>Move To</u>	0
<u>Table Insert</u>	0
~~Table Delete~~	0
<u>Table moves to</u>	0
~~Table moves from~~	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	63