Decision 26-10-070 October 29, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of San Diego Gas & Electric Company (U 902 E) for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design.	Application 23-01-008

DECISION GRANTING COMPENSATION TO UTILITY CONSUMER'S ACTION NETWORK FOR SUBSTANTIAL CONTRIBUTION TO DECISION 25-09-006

Intervenor: Utility Consumers' Action Network	**For contribution to Decision (D.) 25-09-006**
Claimed: $107,732.25	**Awarded: $88,917.88**
Assigned Commissioner: John Reynolds[1]	**Assigned ALJ: Marcelo Poirier[2]**

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	In D.25-09-006, the Commission adopted three settlement agreements including a Marginal Cost Settlement Agreement, a Partial Settlement Agreement, and the Medical Baseline Settlement Agreement. The decision also adopted the system percentage of change methodology to update rates and several other proposals made by parties. All-party settlement discussions began in January of 2024 to find compromises in party positions, avoid litigation, and resolve differences among the parties regarding multiple GRC Ph 2 issues. UCAN actively participated in these discussions that resulted in three Settlements being presented to the Commission in May and June of 2024. While the details of these settlement discussions remain confidential,

[1] Application 23-01-008 was reassigned from President Alice Reynolds to President John Reynolds on May 27, 2026.
[2] Application 23-01-008 was reassigned from Administrative Law Judge (ALJ) Rajan Mutialu to ALJ Marcelo Poirier on April 9, 2026.

	UCAN will cite to primary documents for our substantial contribution, wherever possible. UCAN was mentioned in the decision for several specific issues which are detailed below.

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

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	May 10, 2023	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	June 9, 2023	June 16, 2023 UCAN failed to file a timely NOI in this proceeding. The PHC took place on May 10, 2023; the NOI would be due 30 days after that date. However, *See* Part.I.C Additional Comments [1].
4. Was the NOI timely filed?		*See* Part.I.C Additional Comments [1].

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

	Intervenor	CPUC Verification
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	A.23-01-008 On April 12, 2024, an Administrative Law Judge's Ruling was issued denying Utility Consumer Action Network's (UCAN) Notice of Intent (NOI) in Application (A.) 23-01-008. However, as explained in Part I.C, a subsequent April 23, 2024, e-mail ruling superseded the earlier determination and accepted UCAN's NOI as timely based on a finding of good cause.
6. Date of ALJ ruling:	May 27, 2022	April 12, 2024
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes. However, *See* Part.I.C Additional Comments [1].
Showing of "significant financial hardship" (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	A.21-12-006	A.23-01-008 On April 12, 2024, an Administrative Law Judge's Ruling was issued denying Utility Consumer Action Network's (UCAN) Notice of Intent (NOI) in

	Intervenor	CPUC Verification
		Application (A.) 23-01-008. However, as explained in Part I.C, a subsequent April 23, 2024, e-mail ruling superseded the earlier determination and accepted UCAN's NOI as timely based on a finding of good cause.
10. Date of ALJ ruling:	May 27, 2022	April 12, 2024
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes. However, *See* Part.I.C Additional Comments [1].
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.25-09-006	Verified
14. Date of issuance of Final Order or Decision:	September 22, 2025	Verified
15. File date of compensation request:	November 21, 2025	Verified
16. Was the request for compensation timely?		Yes. However, *See* Part.I.C Additional Comments [1].

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
[1]		Rule 17.1(a) requires that a Notice of Intent (NOI) be filed within 30 days of the prehearing conference (PHC). In this proceeding, the PHC was held on May 10, 2023, establishing a filing deadline of June 9, 2023. UCAN filed its NOI on June 16, 2023, seven days late and concurrently submitted a motion requesting acceptance of the late filing.

#	Intervenor's Comment(s)	CPUC Discussion
		That motion was not formally granted at the time. On April 12, 2024, the NOI was rejected as untimely. Subsequently, on April 23, 2024, an e-mail ruling was issued that accepted UCAN's NOI as timely and superseded prior rulings. The April 23 ruling referenced a June 23, 2023 Administrative Law Judge ruling that had granted UCAN's motion based on good cause. Although the June 23 ruling was circulated to the service list and transmitted to the Intervenor Compensation Coordinator inbox, it had not been formally filed into the Docket. Because the April 23, 2024 e-mail ruling accepted UCAN's NOI as timely based on a finding of good cause and superseded earlier determinations, we accept UCAN's NOI to claim intervenor compensation in 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. <u>Marginal Cost Settlement Agreement</u> UCAN joined eight other parties on the Marginal Cost Settlement Agreement. The settlement reflects a compromise of positions held by the parties. UCAN had raised an issue regarding the shared service drop analysis used by SDG&E.	D. 25-09-006 at 8. Ordering Paragraph (OP) #2 at 93. UCAN-1, Direct Testimony of Mary Neal, filed Jan. 8, 2024, at 2, 10-12. And see UCAN-SDGE-DR-001, Q4, UCAN-SDGE-DR-002, Q1 and Q2, attached to UCAN-1.	Verified

The Settlement Agreement referenced UCAN's position. By signing the MC Settlement Agreement, the MC Settling Parties agreed to resolve all contested marginal cost issues thereby avoiding the need to litigate and resolve the differences among the multiple marginal cost proposals from the parties. UCAN's participation in reaching the settlement agreement and avoiding litigation was a direct benefit to ratepayers by preventing extra litigation expenses.	Joint Motion for Adoption of Marginal Cost Settlement Agreement, filed May 28, 2024, at 11-12 and see fn. 50. Also see Attachment B, Comparison Exhibit, B2, attached to Joint Motion.	
2. <u>Partial Settlement Agreement</u> UCAN joined nine other parties on the Partial Settlement Agreement. The settlement reflects a compromise of positions held by the parties. UCAN recommended that SDGE conduct a full evaluation of NEM cost-of-service cross-subsidies in the next GRC Phase 2, noted in the decision. The Partial Settlement Agreement noted two of UCAN's positions. By signing the Partial Settlement Agreement, UCAN	D. 25-09-006 at 7. OP #1 at 92. D. 25-09-006 at 51, and see fn. 132 (referencing UCAN-2 at 8 but should reference UCAN-2 at 3-5 and UCAN-1 at 1-9). And see DR-001 Q5, Q6 attached to UCAN-1, Direct Testimony of Mary Neal, filed Jan. 8, 2024. Joint Motion for Adoption of Partial Settlement Agreement, filed May 28, 2024, at 29, fn. 103, and Attachment B, Comparison Exhibit at B16 attached to Joint Motion.	Verified

agreed all contested NEM issues were resolved. Agreeing on NEM data and studies for the next GRC Ph 2 is important for ratepayers to avoid underpayments and disparate rate impacts. The decision adopted the provisions in the Partial Settlement Agreement in relation to providing NEM data.	D. 25-09-006 at 52. Conclusion of Law #26 at 88. OP #9 at 94.	
3. <u>Medical Baseline Settlement Agreement</u> UCAN joined CforAT and the City of San Diego in opposition to the Medical Baseline Settlement Agreement. The decision noted UCAN and the other opposing parties' positions. After thoroughly examining all of the participating parties' positions, the Commission adopted the Medical Baseline Settlement Agreement finding it reasonable, consistent with the law, and in the public interest. While not adopting the opposing parties' positions on the Medical Baseline Discount, by providing testimony and an opposition motion, UCAN believes the record was made more robust and complete by the opposing parties, enabling the Commission to thoroughly	Opposition of CforAT, UCAN, City of SD to Motion of SDGE, CalPA and TURN for Adoption of Medical Baseline Settlement Agreement, filed July 3, 2024. D. 25-09-006 at 57, fn. 149 citing to UCAN-2, Rebuttal Testimony of Mary Neal, filed Feb. 7, 2024 at 12-13. *Also see* D. 25-09-006 at 58, fn's 152-155. D. 25-09-006 at 60. OP #3 at 93.	Verified

examine this issue in light of the whole record.		
4. <u>Whether SAPC Methodology Should be Modified</u> While UCAN was a Settling Party to the Partial Settlement Agreement filed May 28, 2024, numerous issues were not included in the Partial Settlement Agreement and remained contested. The SAPC Methodology was one of the unsettled issues contested by UCAN. The decision devoted multiple pages to discussing UCAN's position and SDG&E's response, referencing UCAN's Direct Testimony and Opening Brief. Based on a review of the record, the final decision agreed with UCAN and adopted its recommended SAPC methodology for SDG&E.	*See* Joint Motion for Adoption of Partial Settlement Agreement, filed May 28, 2024, at 2. *See* Opening Brief of UCAN on the Unsettled Issue of the SAPC Methodology, filed August 16, 2024. *And see* D. 25-09-006 at 61. *See* D. 25-09-006 at 61-64 *and see* fn's 159-169. D. 25-09-006 at 64.	Verified

B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?	Yes	Yes
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Yes
c. If so, provide name of other parties: CforAT		Noted; however, TURN, SBUA, and CFBF also shared similar positions
d. Intervenor's claim of non-duplication: The GRC Ph 2 examines numerous complex issues regarding marginal costs, different types of rate design, customer classes, cost recovery, revenue allocation, and treatment of other unique costs. Multiple parties provided testimonies, analyses and recommendations. Naturally, some parties aligned on some issues and diverged on others. In this proceeding, UCAN focused on several unique issues including service drops, NEM data and cost-of-service studies, and the SAPC methodology, which the Commission adopted. Many issues analyzed by Cal Advocates were not examined by UCAN, such as Marginal Energy Costs and the New Customer Only (NCO) method to calculate the MDCC. Additionally, UCAN opposed Cal Advocates and TURN's positions on the Medical Baseline Settlement Agreement. In these ways, UCAN's work did not duplicate Cal Advocates' or TURN's. Additionally, in the settlement process, UCAN worked closely with all parties, providing unique perspectives on certain issues. UCAN coordinated with other parties throughout the proceeding to achieve a reasonable compromised outcome on most of the disputed issues. If the Commission does find any duplication of effort UCAN urges it to be found 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 seeks a total compensation award of $107,732.25 as the reasonable cost of its participation. This amount includes time for UCAN's	Noted

	CPUC Discussion
representative, expert, and support staff. UCAN urges the Commission to find these costs reasonable in light of its substantial contribution to the decision detailed in Part II.A above. UCAN's participation led to meaningful benefits for residential ratepayers. For example, by advocating for the NEM cost-of-service study in Direct Testimony, UCAN was able to keep this issue front-and-center. The Partial Settlement Agreement included compromised terms for NEM that addressed UCAN's concerns about cross-subsidies created by NEM policy. The adoption of UCAN's recommended SAPC methodology also addressed UCAN's concerns about providing rate stability for customers as well as a smooth allocation of revenues for all customer classes. UCAN also participated in settlement negotiations with a good faith effort to settle as many issues as possible thereby reducing the need for litigation to resolve the differences among the parties. In these ways, UCAN believes the benefits gained for ratepayers far exceed the cost of its participation. UCAN urges the Commission to find these costs reasonable.	
b. Reasonableness of hours claimed: UCAN is claiming 109.64 hours for representative Jane Krikorian, 164 for expert Mary Neal, and 29.50 hours for support staff. The majority of these hours are for substantive work examining important cost issues in SDG&E's GRC Ph 2 Application. UCAN's recommendations and work in settlement discussions to craft compromises on those recommendations and other issues, reflected concerns for ratepayer savings. These savings were realized in the Settlement Agreements joined by UCAN and in the adoption of UCAN's recommendation on the SAPC issue, detailed in Part II.A above. The majority of UCAN's hours were spent on substantive issues including examining SDG&E's Application and testimonies, writing data requests, preparing opening and rebuttal testimony in response, and filing opening and reply briefs on the unsettled SAPC issue. UCAN also attended the multiple settlement negotiation meetings. The settlement meetings require patience and attention to detail as issues are examined and party positions are heard. It was important for both UCAN representative Jane Krikorian and expert Mary Neal to attend these meetings together so that issues could be monitored and procedural deadlines could be met. Due to UCAN's success with the NEM and SAPC issues, as well as other settled issues which resulted in savings and rate stability for ratepayers, UCAN urges the Commission to find the number of hours claimed by UCAN reasonable.	After the adjustments made to this claim, the remainder of the claimed hours are reasonable. *See* Part III.D CPUC Comments, Disallowances, and Adjustments.

<table>
<tr><th></th><th>CPUC Discussion</th></tr>
<tr><td>Timesheets and Allocation of hours – for representative Jane Krikorian and expert Mary Neal, an effort was made to break out their time by issues listed in Part II.A – Substantial Contribution. Time was also broken out by Initial Preparation (IP), Identifying Issues (II), Settling Issues (SI), and Preparing and Presenting – a “catch-all” for different proceeding-related tasks. These categories are to help reflect how UCAN spent its time and made its substantial contributions.

Additional Comments on Timesheets and hours – UCAN worked diligently to comply with the IComp Program at 25 and avoid vagueness and/or combining tasks. UCAN asks that where there has been an oversight of this directive to find it minimal and therefore reasonable.</td><td></td></tr>
<tr><td>c. Allocation of hours by issue:

<table>
<tr><td>Identifying Issues</td><td>29.76</td><td>10%</td></tr>
<tr><td>Initial Preparation</td><td>12.25</td><td>4%</td></tr>
<tr><td>Medical Baseline Settlement Agreement</td><td>29.68</td><td>10%</td></tr>
<tr><td>Partial Settlement Agreement - Net Energy Metering</td><td>29.19</td><td>10%</td></tr>
<tr><td>Preparing & Presenting</td><td>54.15</td><td>18%</td></tr>
<tr><td>System Average Percent Change (SAPC)</td><td>54.43</td><td>19%</td></tr>
<tr><td>Settlement Agreement - Shared Service Drops</td><td>13.94</td><td>5%</td></tr>
<tr><td>Settling Issues</td><td>70.50</td><td>24%</td></tr>
</table></td><td>Noted, totals 100%</td></tr>
</table>

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Jane Krikorian	2023	20.75[4]	$375	D.25-05-026	$7,781.25	16.87 [6]	$375 [1]	$6,326.25

[4] Timesheet records show a total of 19.75 hours for 2023.

CLAIMED						CPUC AWARD		
Jane Krikorian	2024	77.15	$390	D.25-05-026	$30,088.50	59.15 [6]	$390 [1]	$23,068.50
Jane Krikorian	2025	2.5	$545	See Comment 1	$1,363.50	2.00 [6]	$520 [1]	$1040.00
Mary Neal (Consultant)	2023	36.75[5]	$350	D.25-02-024	$12,863.50	34.50 [6]	$345 [2]	$11,902.50
Mary Neal (Consultant)	2024	111.50	$365	See Comment 2	$40,698.50	87.50 [6]	$365 [2]	$31,937.50
Mary Neal (Consultant)	2025	15.75	$380	See Comment 2	$5,985.00	15.25 [6]	$380 [2]	$5,795.00
Benjamin Kern (Consultant)	2023	21.5	$220	D.25-05-026	$4,537.50	21.50	$220 [3]	$4,730.00
Benjamin Kern (Consultant)	2024	8	$230	See Comment 3	$1,840.00	8.00	$230 [3]	$1,840.00
					Subtotal: $105,347.25			***Subtotal:* $86,639.75**
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Jane Krikorian	2023	1.75	$180	D.25-08-048	$341025	1.75	$187.50 [1]	$328.13
Jane Krikorian	2025	7.5[6]	$272.5	See Comment 1	$2,043.75	7.50 [5]	$260.00 [1]	$1,950.00
					Subtotal: $2,385.00			***Subtotal: $2,278.13***
					TOTAL REQUEST: $107,732.25			***TOTAL AWARD: $88,917.88***

*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

[5] Timesheet record shows a total of 35.75 hours for 2023.

[6] Timesheet record shows a total of 10.50 hours claimed for Intervenor Compensation preparation hours for 2025.

CLAIMED			CPUC AWARD
ATTORNEY INFORMATION			
Attorney	**Date Admitted to CA BAR[7]**	**Member Number**	**Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation**
Jane Krikorian	January 3, 2025	359865	No

C. Attachments Documenting Specific Claim and Comments on Part III[8]:

Attachment or Comment #	Description/Comment
Attachments	Certificate of Service Jane Krikorian's Resume Mary Neal Resume MRW Invoices
Comment 1 Rate Request for Jane Krikorian	**Request for 2025 Hourly Rate Pursuant to Resolution ALJ-393** **UCAN Representative:** Jane Krikorian **Labor Role:** Legal – Attorney **Level:** III (5-10 yrs experience) **2025 Hourly Rate Range (estimated):** $379 - $589 **Requested Hourly Rate:** $545 **Current Resume:** See Attachments UCAN requests a new rate for Ms. Jane Krikorian in the Attorney category based on her recent admittance to the California Bar in January 2025. Ms. Krikorian's previous categorization was set in 2021 per D.21-12-050 as an Expert: Public Policy Analyst, Level III. Due to Ms. Krikorian's legal experience and years practicing before the Commission, UCAN requests Ms. Krikorian be placed in the Attorney category also at Level III. Ms. Krikorian has 17 years of legal experience, with the past 11 years at UCAN steadily increasing her responsibilities and practice experience before the Commission. Prior to joining UCAN and after receiving her Juris Doctorate in 2010, Ms. Krikorian spent several years as a law clerk at the Legal Aid Society of San Diego assisting in the administrative law areas of the Internal Revenue Service (IRS) and Social Security Administration (SSA). While in law school at California Western School of Law, Ms. Krikorian gained extensive legal research experience working as a law clerk for constitutional law professor Michael R. Belknap (2008-2010).

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

[8] Attachments not included in the final Decision.

Attachment or Comment #	Description/Comment
	In February 2014, Ms. Krikorian was hired at UCAN. Since then, she has increased her responsibilities and practice experience before the Commission. This includes increased involvement in UCAN's overall advocacy strategies and efforts to contain the increasing costs of electricity on behalf of ratepayers. Ms. Krikorian has helped develop UCAN's legal and policy positions in numerous energy-related proceedings including Integrated Resource Planning, Power Charge Indifference Adjustment, Transportation Electrification, and more recently the Rulemaking to Advance Demand Flexibility through Electric Rates and the Rulemaking to Modernize the Electric Grid for a High Distributed Energy Resources Future. Ms. Krikorian has been involved in several General Rate Cases and Cost-of-Capital proceedings. Ms. Krikorian's involvement in proceedings includes working with expert consultants and witnesses to develop and file testimony, preparing for evidentiary hearings and cross-examining witnesses, writing briefs and submitting comments on Commission rulings and proposed decisions. Ms. Krikorian continues to develop her expertise at the Commission with her recent involvement in proceedings on safety, reliability and ratesetting. The Market Rate Study Hourly Rate Chart lists that an Attorney in Level III should have a JD or equivalent degree, 5-10 years of experience, and be licensed to practice law. It also notes that, "Higher experience levels should have experience with areas of law and procedures relevant to CPUC matters…" Due to Ms. Krikorian's 11 years at UCAN and relevant experience of practicing in front of the Commission, her JD and recent admittance to the CA State Bar, UCAN requests Ms. Krikorian's rate be established at $545 which should be between the Median Range and High Range for 2025. (Current 2025 rates are not yet published on the Commission website so her 2025 rate in the Public Policy Analyst category with COLA's is estimated at between $415 and $435). UCAN believes this is a just and reasonable rate based on the parameters of the Market Rate Study for an Attorney Level III and Ms. Krikorian's education, higher experience level and recent admittance to the California State Bar. UCAN appreciates the Commission's consideration of this request for Ms. Krikorian.
Comment 2 Mary Neal (Consultant) COLA Increase Request	UCAN requests a COLA rate increase for Mary Neal for the years 2023, 2024 and 2025. Ms. Neal's rate for 2022 was established in D.25-02-024 at $335. UCAN requests Ms. Neal's rates be increased to $350 for 2023 based on the 4.46% COLA increase, to $365 based on the 4.07% COLA increase, and to $380 for 2025 based on the 3.46% COLA increase. These COLA

Attachment or Comment #	Description/Comment
	increase percentages come from the Market Research Study's excel spreadsheet. The requested rates all fall within the Hourly Rate Chart's range for a Level V Energy and Resources Expert with a Bachelor's Degree and 15+ years of experience. Ms. Neal holds a Master's Degree in Energy and Environmental Analysis from Boston University, and in 2023 had 14 years of experience in energy consulting (equivalent to a Bachelor's Degree and 18 years of experience) plus an additional three years as an engineer at a natural gas combustion turbine manufacturer prior to becoming a consultant. Ms. Neal has submitted 17 written testimonies in proceedings before the California Public Utilities Commission and a total of 36 in the U.S. and Canada. Ms. Neal's testimony and expertise helped raise and resolve important issues in each of the proceedings where she filed testimony on behalf of Utility Consumers' Action Network. For example, in SDG&E's previous General Rate Case Phase 2 (A.19-03-002) Ms. Neal's testimony was the first to recommend adoption of the System Average Percentage Change (SAPC) method for rate changes in between GRCs, which was ultimately implemented. Then, in the most recent GRC Phase 2 (A.23-01-008), Ms. Neal submitted testimony outlining how SDG&E should improve its SAPC methodology to maximize the rate stability benefits of the method, which was adopted by the CPUC in the final decision. For SDG&E's Power Your Drive Extension (A.19-10-012) application Ms. Neal's testimony and analysis showed how SDG&E failed to justify cost assumptions and the proposed program size and budget; in SDG&E's Seasonal Differentiation and High User Charge (A.19-09014) proceeding, Ms. Neal brought a consumer-focused prospective to why the HUC should be eliminated and proposed changes to SDG&E seasonal rate differential proposal that were made part of the settlement. Given the experience and qualifications detailed above, UCAN believes that Ms. Neal qualifies as a Level V Energy and Resources Expert. We note that while D.25-02-024 set Ms. Neal's rate at $345 for 2023, that decision used the Level IV Energy and Resources Expert range, which did not allow for the full COLA increase from Ms. Neal's 2022 rate. The Hourly Rate Chart calculates changes to the minimum and maximum values of the range by adding COLA increases calculated using the midpoint of the range (meaning that the high end of the Level IV range increased by 3.0% to $349.53 for 2023 instead of by 4.46% to $354.45). UCAN believes that full COLA increases in Ms. Neal's rate from $335 in 2022 to $350 in 2023, $365 in 2024 and $380 in 2025 are justified and consistent with the range of hourly rates for a Level V Energy and Resources Expert.

Attachment or Comment #	Description/Comment
Comment 3 Benjamin Kern (Consultant) COLA Increase Request	UCAN requests the following rate adjustments for Mr. Kern to incorporate the appropriate COLA increases. D.25-05-026 set a 2023 rate of $220 for Mr. Kern based on the Market Rate Study Hourly Rate Chart. COLA Increase Request 202: $220 x 4.07% = $228.95(rounded to the nearest $5=$230)

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Jane Krikorian 2023, 2024 and 2025 Hourly Rate & Intervenor Compensation Rates	D.25-02-024 approved a 2023 rate of $375.00 for Krikorian. As Intervenor Compensation Claim Preparation hours are compensated at ½ preparer's normal hourly rate, we apply the rate of $187.50 for Krikorian. D.25-03-027 approved a 2024 rate of $390.00 for Krikorian. D.26-04-017 approved a 2025 rate of $520.00 for Krikorian. As Intervenor Compensation Claim Preparation hours are compensated at ½ preparer's normal hourly rate, we apply the rate of $260.00 for Krikorian.
[2] Mary Neal (Consultant) Hourly Rates	UCAN has confirmed that Neal 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. 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)). UCAN has confirmed that it paid Neal $350.00 per hour in 2023 for work in this proceeding. Given that the 2023 rate range for Energy and Resources Expert IV is $174.93 to $349.53, the billed hourly rate of $350.00 exceeds the market rate for their role. We find the rate of $345 to be reasonable given Neal's experience and approve this rate here. UCAN has confirmed that it paid Neal $365 per hour in 2024 for work in this proceeding. Given that in 2024, Neal would have 15+ experience, we qualify her as an Expert - Energy and Resources – level V. We find the rate of $365 to be reasonable given Neal's experience and approve this rate here. UCAN has confirmed that it paid Neal $380 per hour in 2025 for work in this proceeding. Given that in 2025, Neal would have 15+ experience, we qualify her as an Expert - Energy and Resources – level V. We find the rate of $380 to be reasonable given Neal's experience and approve this rate here.

Item	Reason
	The award determined herein for the consultant's contribution in this proceeding shall be paid 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 full compensation for the work performed until final award is given.
[3] Benjamin Kern 2023 and 2024 Hourly Rate	UCAN has confirmed that Kern 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. 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)). UCAN has confirmed that it paid Kern $220 per hour in 2023 and $230.00 per hour in 2024 for work in this proceeding. We find this rate reasonable given Kern's experience and approve this rate here. The award determined herein for Kern's contribution in this proceeding shall be paid in full to Kern, and no portion of this part of the award shall be kept by UCAN. 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.
[4] Krikorian hours	<u>Administrative/Clerical</u> The Commission does not compensate attorneys for their time spent on clerical and administrative tasks. See D.98-11-049 and D.08-09-034. We therefore reduce hours for the activities below: <u>2023 (1.00 hours disallowed):</u> • 10/31/2023: Reviewing emails re: MRW's proposal for becoming UCAN's expert (0.50 hours) • 12/15/2023: Reviewing emails re: NDAs and discovery. Sending email to SDG&E w/ signed NDAs (0.50 hours)

<table>
<tr><th>Item</th><th>Reason</th></tr>
<tr><td>[5] 2022 Hours and Incorrect hours listed in Part III.B</td><td>UCAN did not request any hours or rates for 2022 in this claim. While the time records reflect Krikorian's and Neal's attendance at the SDG&E NEM Workshop in December 2022, UCAN did not request compensation for any 2022 hours. Accordingly, the Commission cannot award compensation for their participation in the workshop.

Intervenor Compensation Hours
Additionally, hours differ with the information given in Part III.B and the timesheet records provided by UCAN. See footnote 6. As such, Intervenor preparation hours of 1.75 for 2022 and 7.50 for 2025 are reasonable for Krikorian and we adopt those hours here.</td></tr>
<tr><td>[6] Reduction of Hours for Krikorian and Neal 2022, 2023, 2024 and 2025 hours</td><td>Inefficient Duplication of Efforts

The Commission compensates intervenors for reasonable and efficient participation that contributes to the development of the record and aids in decision-making. However, we find that UCAN's claimed hours reflect a significant duplication of effort that did not add significant additional value. Specifically, multiple representatives, whether attorneys or experts—worked on the same issues, frequently communicated, attended the same meetings, or workshops, and participated in activities where only one representative would have been sufficient, given the scope of the issues involved.

UCAN's level of staffing resulted in unnecessary, redundant, and inefficient participation that did not provide added value to the proceeding. Accordingly, we find that the involvement of multiple representatives in these instances was not justified and resulted in excessive hours. As a result, we reduce Krikorian and Neal's hours spent performing the same tasks by 50%.[9]

<table>
<tr><th>Representative</th><th>Year</th><th>Duplicative total hours</th><th>Hours reduced</th><th>Hours awarded</th></tr>
<tr><td>Krikorian</td><td>2023</td><td>3.75</td><td>1.88</td><td>1.88</td></tr>
<tr><td>Krikorian</td><td>2024</td><td>36.00</td><td>18.00</td><td>18.00</td></tr>
<tr><td>Krikorian</td><td>2025</td><td>1.00</td><td>0.50</td><td>0.50</td></tr>
<tr><td>Neal</td><td>2023</td><td>2.50</td><td>1.25</td><td>1.25</td></tr>
<tr><td>Neal</td><td>2024</td><td>48.00</td><td>24.00</td><td>24.00</td></tr>
<tr><td>Neal</td><td>2025</td><td>1.00</td><td>0.50</td><td>0.50</td></tr>
</table></td></tr>
</table>

[9] *See* timesheet dates for Krikorian and Neal on 12/05/2022, 11/17/2023, 12/01/2023, 12/14/2023, 01/03/2024, 01/05/2024, 01/08/2024, 01/17/2024, 01/22/2024, 01/24/2024, 01/30/2024, 01/31/2024, 02/06/2024, 02/07/2024, 02/12/2024, 02/15/2024, 02/21/2024, 02/22/2024, 02/26/2024, 02/27/2024, 02/28/2024, 03/04/2024, 03/06/2024, 03/11/2024, 03/15/2024, 03/18/2024, 03/20/2024, 03/21/2024, 03/25/2024, 03/27/2024, 04/22/2024, 04/24/2024, 05/02/2024, 05/08/2024, 05/10/2024, 05/15/2024, 07/31/2024, 08/06/2024, 08/29/2024, 08/30/2024, 11/21/2024, 12/02/2024, 12/02/2024, 08/28/2025.

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. Utility Consumers' Action Network has made a substantial contribution to D.25-09-006.
2. UCAN's claimed hours are reduced for purposes of compensation to reasonably reflect the value of the substantive contribution provided.
3. 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, and/or reflect the actual rates billed to, and paid by the intervenor, for consultant services rendered.
4. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
5. The total of reasonable compensation is $88,917.88.

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 $88,917.88.
2. Within 30 days of the effective date of this decision, San Diego Gas and Electric Company shall pay Utility Consumers' Action Network the total award. 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 February 4, 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 29, 2026, at San Francisco, 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:	D2610070	**Modifies Decision?**	No
Contribution Decision(s):	D2509006		
Proceeding(s):	A2301008		
Author:	ALJ Marcelo Poirier		
Payer(s):	San Diego Gas and Electric Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Utility Consumers' Action Network	11/21/2025	$107,732.25	$ 88,917.88	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
Jane	Krikorian	Attorney	$375	2023	$375
Jane	Krikorian	Attorney	$390	2024	$390
Jane	Krikorian	Attorney	$545	2025	$520
Mary	Neal	Expert[10]	$350	2023	$345
Mary	Neal	Expert[10]	$365	2024	$365
Mary	Neal	Expert[10]	$380	2025	$380
Benjamin	Kern	Expert[11]	$220	2023	$220
Benjamin	Kern	Expert[11]	$230	2024	$230

(END OF APPENDIX)

[10] Neal worked as a consultant for UCAN in this proceeding.

[11] Kern worked as a consultant for UCAN in this proceeding.