Decision 26-10-068 October 29, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for Authority to Establish Its Authorized Cost of Capital for Utility Operations for 2026. (U 39 M)	Application 25-03-010 (Filed March 20, 2025)
And Related Matters	Application 25-03-011 (Filed March 20, 2025) Application 25-03-012 (Filed March 20, 2025) Application 25-03-013 (Filed March 20, 2025)

DECISION GRANTING COMPENSATION TO THE UTILIY REFORM NETWORK FOR SUBSTANTIAL CONTRIBUTION TO DECISION (D.) 25-12-043

Intervenor: The Utility Reform Network (TURN)	**For contribution to** D.25-12-043
Claimed: $204,530.74 [17]	**Awarded:** $198,334.75
Assigned Commissioner: John Reynolds[1]	**Assigned ALJ:** Jonathan Lakey

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	In D.25-12-043, the Commission established the 2026 ratemaking cost of capital for Pacific Gas and Electric Company, Southern California Gas Company, Southern California Edison Company, and San Diego Gas & Electric Company, adopting authorized capital structures and setting the costs of long-term debt, preferred equity, common equity, and overall rates of return for the test year.

[1] A.25-03-010 has been reassigned to Commissioner John Reynolds from Commissioner Alice Reynolds as of September 9, 2026.

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812[2]:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	6/25/2025	Verified
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	7/24/25	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	A.25-03-015
6. Date of ALJ ruling:	3/20/2024	7/8/2025
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:	A.23-06-008	A.25-03-015
10. Date of ALJ ruling:	3/20/2024	7/8/2025
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.25-12-043	Verified
14. Date of issuance of Final Order or Decision:	12/22/2025	Verified
15. File date of compensation request:	2/20/2026	Verified
16. Was the request for compensation timely?		Yes

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

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. Return on Equity ("ROE") PG&E requested an ROE of 11.3%, up from the current level of 10.28%, representing an increase of 9.9%. SCE requested an ROE of 11.75%, up from the current level of 10.33%, representing an increase of 13.7%. SoCalGas requested an ROE of 11.0%, up from the current level of 10.08%, representing an increase of 9.1%. SDG&E requested an ROE of 11.25%, up from the current level of 10.23%, representing an increase of 9.97%. TURN argued that: 1) California IOUs do not carry more risks than utilities in other states to justify a higher risk premium, 2) California IOUs have earned at least their authorized ROEs since 2018, 3) Authorizing the ROEs sought by the IOUs would worsen the affordability crisis while unnecessarily enriching utility shareholders, 4) the Commission should authorize ROEs that provide a fair level of return to investors and also in the public interest. TURN recommended a 9.5% for all four of the IOUs. After considering the financial, business, and regulatory risks, the Commission largely agreed with TURN and reduced ROEs by 30 basis points for the IOUs, resulting in 9.98% for PG&E, 9.78% for SoCalGas, 10.03% for	• TURN Opening Brief (September 19, 2025) pp. 2-19. • D.25-12-043, pp. 48-53.	Verified

SCE, and 9.93% for SDG&E, which were all close to TURN's recommended levels.		
2. PG&E's Proposed Capital Structure Changes PG&E proposed to reduce preferred equity and increase long-term debt while maintaining its 52.00% common equity ratio. PG&E argued that its proposal would help support credit metrics and allow the company to attract capital at lower cost. TURN opposed PG&E's request to increase debt as higher leverage would increase financial risk and could raise costs for ratepayers. TURN further argued that PG&E's actual equity levels have been significantly below its authorized level, indicating that increasing leverage was unnecessary and could worsen financial risk. The Commission denied PG&E's request to reduce preferred equity and increase long-term debt and retained PG&E's existing authorized capital structure.	• D.25-12-043, pp. 6-7. • D.25-12-043, p. 8. • TURN Opening Brief (September 19, 2025) pp. 24-26 • D.25-12-043, pp. 9-10.	Verified
3. SDG&E's Proposed Capital Structure Changes SDG&E proposed to increase its common equity ratio to 54.00%, eliminate preferred equity, and increase long-term debt. SDG&E further argued that increasing equity would help manage financial risk, support credit ratings, and benefit ratepayers through improved access to capital. TURN opposed SDG&E's proposal, stating that SDG&E has historically maintained equity ratios above authorized levels and arguing that increasing the authorized ratio was unnecessary. They also suggested that elevated equity ratios strengthen the parent company's balance sheet rather than reflect Commission requirements.	• D.25-12-043, pp. 15-16. • D.25-12-043, pp. 18-19. • D.25-12-043, pp. 16-17. • TURN Opening Brief (September 19, 2025) pp. 20-23.	Verified

Moreover, the Commission denied SDG&E's request to increase common equity and eliminate preferred equity, finding that maintaining the existing structure appropriately balances credit risk and ratepayer protections. The Commission retained SDG&E's existing authorized capital structure of 52.00% common equity, 2.75% preferred equity, and 45.25% long-term debt.	• D.25-12-043, p. 19.	
4. SCE's Accrued Carrying Cost Proposal SCE proposed that balancing and memorandum accounts amortized over periods longer than 12 months accrue carrying charges at its WACC rather than the short-term commercial paper rate. They further argued that using WACC would align financing costs with the duration of cost recovery and reflect its financing practices. TURN opposed the proposal, arguing that applying WACC would impose significant additional costs on ratepayers. TURN and EPUC/IS further argued that the commercial paper rate remains appropriate because balancing and memorandum accounts are financed through short-term borrowing and applying long-term financing costs is inappropriate. The Commission agreed with TURN and other intervenors and denied SCE's proposal, finding that balancing and memorandum accounts have a lower risk profile that warrants lower carrying charges. The Commission determined that the commercial paper rate remains appropriate and reasonable for these accounts.	• D.25-12-043, pp. 57-58. • D.25-12-043, pp. 58-59. • Exhibit TRN-01, pp. 46 – 47. • D.25-12-043, p. 59.	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.	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes.	Verified
c. If so, provide name of other parties: EPUC/IS		Noted
d. Intervenor's claim of non-duplication: TURN coordinated with Cal Advocates throughout the proceeding to avoid duplicative efforts. While both parties addressed similar issues such as capital structure and ROE, TURN provided distinct analysis regarding PG&E's proposed capital structure changes by emphasizing that PG&E's actual equity ratios in recent years were significantly below authorized levels, demonstrating that increasing leverage was unnecessary and could heighten financial risk. The Commission acknowledged these concerns and denied PG&E's request to increase leverage, finding that maintaining the existing capital structure appropriately balances creditworthiness and ratepayer protections. TURN also presented independent analysis regarding SDG&E's proposal to increase its authorized equity ratio, indicating that SDG&E has historically maintained equity levels above those authorized and raising concerns about whether elevated equity levels were necessary for ratemaking purposes. Furthermore, TURN avoided duplication by sharing an expert witness with IS/EPUC, which reduced the cost of the expert witness by 50%. The hours included in this compensation request already reflects a reduction of 50% of the hours incurred by Brubaker & Associates. The Commission should find that TURN's participation was efficiently coordinated with the participation of Cal Advocates and other intervenors 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 $204,000 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. First and foremost, instead of increasing the ROEs by unreasonable amounts as requested by the IOUs, D25-12-043 reduced the ROEs to levels largely in line with TURN's recommendations. The reduced ROEs will result in hundreds of millions of dollars of savings for California ratepayers each year. This is a significant win for ratepayers during a time of worsening affordability crisis for essential services. D.25-12-043 also addressed significant issues including proposals to modify capital structures that directly affect utility financing costs and the rates paid by customers. The Commission agreed that increasing leverage was not justified and acknowledged TURN's evidence showing that PG&E's actual equity ratios in recent years were substantially below authorized levels. The Commission denied PG&E's request to increase leverage and retained the existing capital structure, finding that it appropriately balances creditworthiness and ratepayer protections. The Commission also summarized TURN's evidence demonstrating that SDG&E has historically maintained equity levels above those authorized and retained the existing capital structure. As a result, the Decision preserved reasonable capital structures and avoided potential increases in financing risk that would ultimately be borne by ratepayers. TURN's financial analysis assisted the Commission in evaluating utility risk and capital structure proposals that affect long-term ratepayer costs. The ratepayer protections achieved through TURN's participation in this proceeding support the reasonableness of TURN's request for compensation. 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.	Noted

<table>
<tr><td></td><td></td></tr>
<tr><td>b. Reasonableness of hours claimed:

This Request for Compensation includes around 522 hours of TURN's attorney and expert time, the equivalent of about 13 weeks of full-time work for an individual attorney. TURN's efforts reflected herein resulted in significant contributions to D.25-12-043, detailed above, and encompass the preparation of comments and other filings by TURN.

TURN assigned this proceeding to Staff Attorney David Cheng. This request for compensation includes approximately 113 hours of Mr. Cheng's time and 409 hours of other TURN attorney and experts' 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 and testimonies, and the time required by evidentiary hearings 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.</td><td>Noted</td></tr>
<tr><td>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>Time spent reviewing Advice Letters</td><td>0.1%</td></tr>
<tr><td>CoC</td><td>Work related to CoC issues including capital structure, balancing account/memo account issues, and carrying costs</td><td>36.4%</td></tr>
<tr><td>Coord</td><td>Time spent coordinating with other parties re issues, procedural items, strategy & others</td><td>2.4%</td></tr>
<tr><td>Disc</td><td>Time spent conducting and reviewing discovery</td><td>2.2%</td></tr>
<tr><td>Ex Parte</td><td>Time spent on reviewing ex parte notices</td><td>0.0%</td></tr>
</table>
</td><td>Noted; totals 100%.</td></tr>
</table>

GH	General Hearing – Prepare, discuss, and attend prehearing conference and evidentiary hearings	1.8%
GP	Work related to general participation in this proceeding (document review, case review, and others)	10.1%
PD	Work related to the Proposed Decision where not easily allocated to specific issue areas	1.6%
ROE	Work related to return on equity	43.9%
Settle	Time spent on settlement discussions	1.2%

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	2025	112.75	$570.00	D.25-06-064	$64,267.50	104.75 [13]	$570.00	$59,707.50
Robert Finkelstein, TURN General Counsel	2025	11.00	$905.00	Res. ALJ-393, 2024 rate plus 3.46% COLA	$9,955.00	11.00	$905.00 [1]	$9,955.00
Jennifer Dowdell, TURN Energy Policy Expert	2025	128.25	$510.00	Res. ALJ-393, 2024 rate plus 3.46% COLA	$65,407.50	128.25	$510.00 [3]	$65,407.50
Matthew Freedman, TURN Attorney	2025	2.00	$805.00	D.25-05-018	$1,610.00	0.00 [14]	$795.00 [4]	$0.00

CLAIMED						CPUC AWARD		
Michael Gorman, Brubaker & Associates	2025	96.47	$325.00	2023 rate (D.25-01-053) plus 2024, 2025 COLA plus 5% step	$31,351.55 [16]	96.47	$325.00 [6]	$31,352.75
Maggie G Ackenhausen, Brubaker & Associates	2025	137.25	$185.00	2023 rate (D.25-01-053) plus 2024, 2025 COLA plus 5% step	$25,391.60 [16]	137.25	$185.00 [7]	$25,391.25
Jeremy Hagemayer, Brubaker & Associates	2025	3.13	$200.00	2023 rate (D.25-01-053) plus 2024, 2025 COLA plus 5% step	$625.00 [16]	3.13	$200.00 [8]	$626.00
Robert Kelvin Buckner III, Brubaker & Associates	2025	0.46	$95.00	Res. ALJ-393 new rate	$43.33 [16]	0.00 [15]	$95.00 [9]	$0.00
Caleb Agnew, Brubaker & Associates	2025	22.81	$120.00	Res. ALJ-393 new rate	$2,736.60 [16]	22.81	$120.00 [10]	$2,737.20
Matthew Klekar, Brubaker & Associates	2025	6.16	$115.00	Res. ALJ-393 new rate	$708.09 [16]	6.16	$115.00 [11]	$708.40
Alex Miazga, Brubaker & Associates	2025	1.82	$95.00	Res. ALJ-393 new rate	$173.32 [16]	1.82	$95.00 [12]	$172.90
					Subtotal: $202,269.49 [17]			***Subtotal: $196,058.50***

CLAIMED						CPUC AWARD		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
David Cheng, TURN Attorney	2025	0.75	$285.00	50% of 2025 Rate	$213.75	0.75	$285.00	$213.75
David Cheng, TURN Attorney	2026	6.00	$307.50	50% of 2026 Rate (2025 rate + 3.3% COLA); See Comment 1	$1,845.00	6.00	$310.00 [2]	$1,860.00
Reina Yanagiba, TURN Legal Assistant	2026	3.00	$67.50	50% of 2026 Rate (2025 rate + 3.3% COLA); See Comment 2	$202.50	3.00	$67.50 [5]	$202.50
					Subtotal: $2,261.25			***Subtotal: $2,276.25***
					TOTAL REQUEST: $204,530.74 [17]			***TOTAL AWARD: $198,334.75***

*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[3]**	**Member Number**	**Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation**
David Cheng	June 2015	303794	No
Matthew Freedman	March 2001	214812	No
Robert Finkelstein	June 1990	146391	No

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

C. Attachments Documenting Specific Claim and Comments on Part III[4]:

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
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 $615 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, adjusted by both (1) an escalation rate of 3.3% for 2026, and (2) the second 5% step increase in the Attorney – Level IV experience tier. Calculation: $570 x [1.033 (COLA) + 0.05 (step increase)] = $617.31, rounded to $615 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 $615 for Mr. Cheng in 2026.
Comment #2	**2026 Rate for Reina Yanagiba** TURN requests an hourly rate of $135 for TURN Legal Assistant Reina Yanagiba in 2026. The requested rate is equal to her pending 2025 rate, $125, adjusted by both (1) an escalation rate of 3.3% for 2026, and (2) the first 5% step increase in the Paralegal – Level II experience tier. Calculation: $125 x [1.033 (COLA) + 0.05 (step increase)] = $135.38, rounded to $135 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

[4] Attachments not included in the Decision.

Attachment or Comment #	Description/Comment
	second step increase results in an hourly rate of $135 for Ms. Yanagiba in 2026.

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Robert Finkelstein (Finkelstein) 2025 Hourly Rate	D.26-04-019 previously approved the rate of $905 for Finkelstein in 2025.
[2] David Cheng (Cheng) 2026 Hourly Rate	TURN requests an hourly rate of $615 for Cheng in the role of Attorney –IV. We note TURN's requested hourly rate is based on the 2026 escalation rate and a requested second step-increase as an Attorney – IV. D.25-06-064 previously approved the rate of $570 for Cheng in 2025. For Cheng's 2026 hourly rate, the Commission applies the annual escalation methodology adopted in Resolution ALJ-393, as well as the requested step-increase. With a 2025 rate of $570, an escalation factor of 3.35% and a second 5% step-increase, we approve a 2026 rate of $620. Intervenor Compensation Claim Preparation hours are compensated at half of the preparer's standard hourly rate, resulting in a 2026 preparation rate of $310 for Cheng
[3] Jennifer Dowdell (Dowdell) 2025 Hourly Rate	D.25-01-053 previously approved the rate of $495 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, an escalation factor of 3.46%, we approve a 2025 rate of $510.
[4] Matthew Freedman (Freedman) 2025 Hourly Rate	D.25-10-059 previously approved the rate of $795 for Freedman in 2025.
[5] Reina Yanagiba (Yanagiba) 2026 Hourly Rate	TURN requests an hourly rate of $135 for Yanagiba in the role of Paralegal – II. We note TURN's requested hourly rate is based on the 2026 escalation rate and a requested first step-increase as a Paralegal – II.

Item	Reason
	D.26-03-040 previously approved a 2025 rate of $125 for Yanagiba. For Yanagiba's 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 $125.00, an escalation factor of 3.35% and a 5% step increase, we approve a 2026 rate of $135. Intervenor Compensation Claim Preparation hours are compensated at half the preparer's standard hourly rate, resulting in a 2026 preparation rate of $67.50 for Yanagiba.
[6] Michael Gorman (Gorman) 2025 Hourly Rate	TURN has confirmed that Gorman is a consultant. Pursuant to the Commission's 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 Intervenor Compensation 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[6]. TURN has provided invoices for Gorman's consulting services for this proceeding and has confirmed that Gorman was paid $325 per hour in 2025. We therefore approve the 2025 rate of $325 for Gorman here. The award determined herein for Gorman's contribution in this proceeding shall be paid in full to Gorman and no portion of this part of the award shall be kept by TURN. 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.
[7] Maggie Ackenhausen (Ackenhausen) 2025 Hourly Rate	TURN has confirmed that Ackenhausen is a consultant. Pursuant to the Commission's 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.[7] Per the Intervenor Compensation 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[8].

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

[6] § 1804(d).

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

[8] § 1804(d).

Item	Reason
	TURN has provided invoices for Ackenhausen's consulting services for this proceeding and has confirmed that Ackenhausen was paid $185 per hour in 2025. We therefore approve the 2025 rate of $185 for Ackenhausen here. The award determined herein for Ackenhausen's contribution in this proceeding shall be paid in full to Ackenhausen and no portion of this part of the award shall be kept by TURN. 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.
[8] Jeremy Hagemayer (Hagemayer) 2025 Hourly Rate	TURN has confirmed that Hagemayer is a consultant. Pursuant to the Commission's 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.[9] Per the Intervenor Compensation 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[10]. TURN has provided invoices for Hagemayer's consulting services for this proceeding and has confirmed that Hagemayer was paid $200 per hour in 2025. We therefore approve the 2025 rate of $200 for Hagemayer here. The award determined herein for Hagemayer's contribution in this proceeding shall be paid in full to Hagemayer and no portion of this part of the award shall be kept by TURN. 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.
[9] Robert Buckner III (Buckner III) 2025 Hourly Rate	TURN has confirmed that Buckner is a consultant. Pursuant to the Commission's 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.[11] Per the Intervenor Compensation Program Guide at 24, the Commission may

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

[10] § 1804(d).

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

Item	Reason
	audit the records and books of the intervenors to the extent necessary to verify the basis for the award[12]. TURN has provided invoices for Buckner's consulting services for this proceeding and has confirmed that Buckner was paid $95 per hour in 2025. We therefore approve the 2025 rate of $95 for Buckner here. The award determined herein for Buckner's contribution in this proceeding shall be paid in full to Buckner and no portion of this part of the award shall be kept by TURN. 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.
[10] Caleb Agnew (Agnew) 2025 Hourly Rate	TURN has confirmed that Agnew is a consultant. Pursuant to the Commission's 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.[13] Per the Intervenor Compensation 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[14]. TURN has provided invoices for Agnew's consulting services for this proceeding and has confirmed that Agnew was paid $120 per hour in 2025. We therefore approve the 2025 rate of $120 for Agnew here. The award determined herein for Agnew's contribution in this proceeding shall be paid in full to Agnew and no portion of this part of the award shall be kept by TURN. 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.
[11] Matthew Klekar (Klekar) 2025 Hourly Rate	TURN has confirmed that Klekar is a consultant. Pursuant to the Commission's 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.[15] Per

[12] § 1804(d).

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

[14] § 1804(d).

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

Item	Reason
	the Intervenor Compensation 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[16]. TURN has provided invoices for Klekar's consulting services for this proceeding and has confirmed that Klekar was paid $115 per hour in 2025. We therefore approve the 2025 rate of $115 for Klekar here. The award determined herein for Klekar's contribution in this proceeding shall be paid in full to Klekar and no portion of this part of the award shall be kept by TURN. 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.
[12] Alex Miazga (Miazga) 2025 Hourly Rate	TURN has confirmed that Miazga is a consultant. Pursuant to the Commission's 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.[17] Per the Intervenor Compensation 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[18]. TURN has provided invoices for Miazga's consulting services for this proceeding and has confirmed that Miazga was paid $95 per hour in 2025. We therefore approve the 2025 rate of $95 for Miazga here. The award determined herein for Miazga's contribution in this proceeding shall be paid in full to Miazga and no portion of this part of the award shall be kept by TURN. 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.
[13] Cheng 2025 Hours	PPH Related Hours (0.50 hours): Public Participation Hearings (PPH) provide members of the public, who are not parties to the proceeding, an opportunity to address their comments and concerns to the Commission. As such, the Commission does not compensate Intervenors for PPH-related hours (*See* D.04-09-050 at 12).

[16] § 1804(d).

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

[18] § 1804(d).

Item	Reason
	Therefore, the following hours are reduced from Cheng's 2025 hours as non-compensable: • 6/12/25, "Call with HG to discuss PPH". TURN claimed a total of 0.25 hours in this entry, 0.25 hours are disallowed. • 6/12/25, "Draft internal memo re PPH". TURN claimed a total of 0.25 hours in this entry, 0.25 hours are disallowed. <u>Excessive General Participation (7.50 hours):</u> Per the Intervenor Compensation Program Guide at 26, timesheet records must not excessively label work as of a "General" issue type (general work on the proceeding). Most of the professional work on the proceeding can and must be associated with the proceeding's substantive issues. In 2025, Cheng claimed a total of 112.75 non-IComp Preparation hours. Timesheet records indicate Cheng dedicated 37.50 of these hours to general participation, which is approximately 33% of all hours claimed. We find this excessive and therefore reduce 20%, or 7.5 hours from Cheng's general participation hours. Minus the total disallowances here of 8.00 hours and 1.00 hour below in item [16], Cheng's 2025 hours now total 103.75.
[14] Freedman 2025 Hours	Pub. Util. Code § 1802(j) states that a substantial contribution means that the intervenor "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." The courts have addressed the requirement of substantial contribution in, for example, TURN v. CPUC 166 Cal.App. 4th 522 (2008), stating at 11: "[T]o be eligible for compensation, the statute requires that the customer have made a 'substantial contribution' to the PUC's proceedings, as the PUC determines. "Substantial contribution' means that, in the judgment of the commission, the customer's presentation has substantially assisted the commission in the making of its order or decision…." In evaluating whether TURN made a substantial contribution here, the Commission evaluates whether the hours claimed were commensurate with the contributions claimed by the intervenor. 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. TURN claims 2.00 hours for Freedman in August 2025 for work related to reviewing SCE's opening comments to the Proposed Decision and drafting reply comments on the issue areas of solar disallowance and Catalina to the

Item	Reason
	Proposed Decision. Upon further review, the Proposed Decision does not address nor include the issue areas claimed by TURN for Freedman and it is unclear how Freedman's work contributed to D.25-12-043. Additionally, the record does not show opening comments filed by SCE or TURN reply comments to the PD filed in August 2025. Therefore, 2.00 hours claimed by Freedman in 2025 are reduced.
[15] Buckner III 2025 Hours	Vague Hours (0.46 hours): Time records for each individual included in the Claim must be provided and must chronologically list the following information, among other things, about each task included in the records: 1) date when the specific task was performed, 2) the issue in the proceeding that the task addressed (as identified in the Scoping Memo or by the ALJ), 3) description of the specific task, and 4) amount of the time spent on the task (in hours or hour fraction). See IComp Program Guide at 25. The following task is vague and therefore reduced: • 7/18/25 – "Checking job for Matt", 0.46 hours. This entry too vague and unclear to discern how it substantially contributed to the decision-making process. 0.46 hours are disallowed. Minus the disallowance here of 0.46 hours, Buckner III's 2025 hours now total 0.00.
[16] Claim Calculation Errors – Incorrect Dollar Amounts Provided	TURN has made calculation errors above in Part III.B. Based on time records provided by TURN, the correct dollar amounts claimed are as follows: • Gorman's 2025 total dollar amount claimed is $31,352.75. • Ackenhausen's 2025 total dollar amount claimed is $25,391.25. • Hagemayer's 2025 total dollar amount claimed is $626.00. • Buckner III's 2025 total dollar amount claimed is $43.70. • Agnew's 2025 total dollar amount claimed is $2,737.20. • Klekar's 2025 total dollar amount claimed is $708.40. • Miazga's 2025 total dollar amount claimed is $172.90. TURN's subtotal for non-IComp Claim Preparation claimed hours is $202,272.20. TURN's total request for compensation equals $204,458.45.

Item	Reason
	We remind TURN to complete all sections of future IComp claims detailed and accurately, and failure to do so may result in future disallowances.
Intervenor Responsibility for Transparency and Accuracy in Compensation Requests	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 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.

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. The Utility Reform Network has made a substantial contribution to D.25-12-043.

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, and/or reflect the actual rates billed to, and paid by the intervenor, 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 $198,334.75.

CONCLUSION OF LAW

1. 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 $198,334.75.

2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company shall pay The Utility Reform 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 May 6, 2026, the 75th day after the filing of The Utility Reform Network's request, and continuing until full payment is made.

This decision is effective today.

Dated October 29, 2026, at San Francisco, California.

JOHN REYNOLDS
President
DARCIE L. HOUCK
KAREN DOUGLAS
MATTHEW BAKER
CHRISTINE HARADA
Commissioners

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D2610068	**Modifies Decision?**	No.
Contribution Decision(s):	D2512043		
Proceeding(s):	A2503010, A2503011, A2503012, A2503013		
Author:	ALJ Jonathan Lakey		
Payer(s):	Pacific Gas and Electric Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	February 20, 2026	$204,530.74 [17]	$198,334.75	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
Robert	Finkelstein	Attorney	$905	2025	$905.00
David	Cheng	Attorney	$570	2025	$570.00
David	Cheng	Attorney	$615	2026	$620.00
Jennifer	Dowdell	Expert	$510	2025	$510.00
Matthew	Freedman	Attorney	$805	2025	$795.00
Reina	Yanagiba	Legal Assistant	$135	2026	$135.00
Michael	Gorman	Expert	$325	2025	$325.00
Maggie	Ackenhausen	Expert	$185	2025	$185.00
Jeremy	Hagemayer	Expert	$200	2025	$200.00
Robert	Buckner	Expert	$95	2025	$95.00
Caleb	Agnew	Expert	$120	2025	$120.00
Matthew	Klekar	Expert	$115	2025	$115.00

Alex	Miazga	Expert	$95	2025	$95.00

(END OF APPENDIX)