Decision 26-10-073 October 29, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company to Recover in Customer Rates the Costs to Support Extended Operation of Diablo Canyon Power Plant from January 1 through) December 31, 2026, and for Approval of Planned Expenditure of 2026 Volumetric Performance Fees (U-39E).	A.25-03-015 (Filed March 28, 2025)

DECISION GRANTING COMPENSATION TO ALLIANCE FOR NUCLEAR RESPONSIBILITY FOR SUBSTANTIAL CONTRIBUTION TO DECISION 25-12-007

Intervenor: Alliance For Nuclear Responsibility	**For contribution to Decision** (D.) 25-12-007
Claimed: $145,808.85	**Awarded:** $139,592.10
Assigned Commissioner: Karen Douglas	**Assigned ALJ:** Jack Chang

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	This decision approves Pacific Gas and Electric Company's (PG&E's) 2026 Diablo Canyon Power Plant extended operations revenue requirement of $382.233 million. The revenue requirement is allocated to PG&E, Southern California Edison Company, and San Diego Gas & Electric Company using the allocation factors 44.19 percent, 45.86 percent, and 9.95 percent, respectively.

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

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	May 30, 2025	Verified
2. Other specified date for NOI:		

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

	Intervenor	CPUC Verification
3. Date NOI filed:	June 25, 2025	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.24-12-003	Verified
6. Date of ALJ ruling:	May 1, 2025	Verified
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
Showing of "significant financial hardship" (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	A.24-12-003	Verified
10. Date of ALJ ruling:	May 1, 2025	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.25-12-007	Verified
14. Date of issuance of Final Order or Decision:	December 9, 2025	Verified
15. File date of compensation request:	January 30, 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
1. A4NR challenged PG&E's continued non-compliance with the requirement in D.22-12-	D.25-12-007 at p. 25 states that A4NR and other parties (including WEM and SBUA, both of which it identified at p.	Verified

005 and D.24-12-033, regarding certain identifiable expenses, to "provide a detailed explanation why PG&E did not seek government funding, or was otherwise unable to anticipate the need for the investments and activities at the time government funding was being requested." A4NR Protest, pp. 1 – 2; A4NR Testimony, p. 22, line 12 – p. 24, line 9;	20 and p. 21, respectively, as citing A4NR testimony) raise legitimate concerns that PG&E may be recovering, in this application, overspending on DCPP transition and renewal costs in excess of the $1.4 billion DWR loan."	
2. A4NR's Testimony identified PG&E's projection that Diablo Canyon transition and license renewal costs would exceed its DWR loan proceeds by $157 million by year end 2026, and included the Brian Ketelsen federal court declaration and its attached TLRES spreadsheet as an exhibit. A4NR Testimony, p. 11, lines 10 – 14; A4NR Testimony Attachment G; A4NR Opening Brief, pp. 3 – 4; A4NR Reply Brief, p. 2; A4NR Opening Comments on PD, pp. 2 – 4, 8 – 9.	D.25-12-007 Finding of Fact 20 at p. 81 states, "PG&E has revealed in the TLRES that it forecasted spending $1.487 billion in transition and license renewal spending forecast through 2026, which is $157 million more than the $1.4 billion allocated in the DWR loan dedicated to transitional and license renewal costs, after accounting for administrative costs that DWR is authorized to retain."	Verified
3. A4NR's cross-examination of PG&E witness Brian Ketelsen established that the company had conducted a "reprioritization" of certain loan-eligible costs that could potentially shift such costs from government funding to ratepayers. A4NR Opening Brief, p. 4; Reporter's Transcript, p. 21, lines 12 – 14; A4NR Reply Brief, p. 2;	D.25-12-007 at p. 25 noted that Mr. Ketelsen had acknowledged the "reprioritization" and concluded, "the parties appropriately raise questions as to whether PG&E's reprioritization of transition and renewal funds might be improperly shifting those costs to the current application as funding for DCPP extended operations. D.25-12-007 at pp. 25 – 26 further concluded, "it is reasonable to require PG&E to disclose whenever any transition and license	Verified

A4NR Opening Comments on PD, pp. 2 – 4, 8 – 9.	renewal costs that were part of the amounts included in the TLRES are proposed for recovery in any future DCPP forecast proceedings for DCPP extended operations, along with explanations for why those costs were originally proposed as transition and license renewal costs and why those costs are now eligible for recovery for extended operations." D.25-12-007 Conclusion of Law 5 at p. 83 states, "PG&E should be required to disclose in future DCPP cost recovery applications whenever any transition and license renewal costs that were part of the amounts included in the TLRES are proposed for recovery in any future DCPP forecast proceedings, along with explanations for why those costs were originally proposed as transition and license renewal costs and why those costs are now eligible for recovery in extended operations." D.25-12-007 Ordering Paragraph 5 at p. 84 states that PG&E "must disclose whenever any transition and license renewal costs that were part of the amounts detailed in the Transition and License Renewal Expenditure Summary in PG&E witness Brian Ketelsen's sworn federal court affidavit are proposed for recovery in any future Diablo Canyon Power Plant (DCPP) forecast proceedings for DCPP extended operations, along with explanations for why those costs were originally proposed as transition and license renewal costs and why those costs are now eligible for recovery for extended operations."	
4. A4NR argued that PG&E's 2026 Volumetric Performance Fees spending plan was inadequately responsive to D.25-06-002 Ordering	D.25-12-007 at p. 73 acknowledges that "PG&E's response to D.25-06-002 requirements that PG&E explain how VPF programs align with the 'guiding	Verified

Paragraph 2's direction to align VPF expenditures with reducing upward pressures on rates. A4NR Opening Brief, pp. 10 – 12; A4NR Reply Brief, pp. 9, 12 – 13; A4NR Opening Comments on PD, p. 8.	principle of reducing upward pressure on rates' lacks depth or detail" and states, "PG&E is encouraged to provide more quantitative analysis and detail in future DCPP cost recovery applications making the case for how each VPF-funded program provides net benefit to ratepayers."	
5. A4NR disputed the PD's Finding of Fact claiming the existence of an established "public review process" for the review of expenses charged to the DWR loan, arguing, "Whatever review is conducted by Commission staff and DWR is opaque, not subject to the Bagley-Keene Open Meetings Act, and only accessible to the public through requests under the Public Records Act, which has numerous exclusions and privileges," and suggesting that the Finding be clarified. A4NR Opening Comments on PD, pp. 8 – 9, 10.	D.25-12-007 at p. 81 incorporates A4NR's suggested correction into Finding of Fact 19.	Verified
6. Procedurally, A4NR made two requests that enhanced the participation in A.25-03-015 of all intervenors. First, it refused to stipulate to PG&E's proposed waiver under Rule 14.6(b) of the time requirements prescribed by Rule 14.3 for Opening and Reply Comments on a Proposed Decision. A4NR Protest, pp. 8 – 9. Second, A4NR utilized its right under Rule 13.14(b) to request oral argument before the Commission.	The Assigned Commissioner's Scoping Memo and Ruling at p. 6 adopted a schedule that afforded parties the full timeframe prescribed by Rule 14.3 for Opening and Reply Comments on the Proposed Decision. The ALJ's October 30, 2025 ruling granted A4NR's motion requesting oral argument before the Commission, and six parties ultimately participated.	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, on specific issues (as noted in the Decision), but not overall.	Yes
c. If so, provide name of other parties: TURN, CARE, WEM, EPUC, SBUA.		Noted
d. Intervenor's claim of non-duplication: Each of the intervening parties brought unique priorities and emphases to the proceeding's issues. While similar observations were made on several issues (and A4NR testimony and briefing was formally cited by other parties), each of the parties used different lines of reasoning and relied on different evidence in those several instances (e.g., transition costs, Fixed Income Fees escalation, Volumetric Performance Fees spending) where their ultimate conclusions aligned.		Noted

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: A4NR's efforts in this proceeding directly contributed to the Commission placing a spotlight on $157 million of Diablo Canyon costs for future scrutiny into whether they have been improperly shifted to ratepayer responsibilities after originally being designated for government funding. This amount exceeds the A4NR compensation request by a ratio of more than 1,076 to 1.	Noted
b. Reasonableness of hours claimed: Because the range of contested issues narrowed after the D.23-12-036 and D.25-06-002 rulemaking decisions and the D.24-12-033 initial forecasting decision, A4NR scaled back the resources invested in this proceeding to address only those issues that had been left unresolved by the earlier decisions.	Noted

	CPUC Discussion
c. Allocation of hours by issue: Operating Expenses Recovery, 63.9475 hours (31.1%); RA Substitution Capacity Expenses, 45.76 hours (22.3%); VPFs Spending, 36.48 hours (17.8%); Compliance With Past Decisions, 44.005 hours (21.4%); General, including claim preparation, 15.26 hours (7.4%).	Noted, totals 100%

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
John Geesman	2025	171.24	795	D.25-12-041	136,135.80	171.24	$795.00 [1]	$136,135.80
David Weisman	2025	23.38	250	D.25-05-017 approved rate for 2024 plus 3.46% ALJ-393 COLA, rounded to nearest $5	5,845.00	0.87 [3]	$250.00 [2]	$217.50
					Subtotal: $141,980.80			***Subtotal:* $136,353.30**
INTERVENOR COMPENSATION CLAIM PREPARATION ****								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
John Geesman	2026	1.4	397.50	D.25-12-041 (see Comment #2 below)	556.50	1.4	$402.50	$563.50
John Geesman	2025	7.68	397.50	D.25-12-041	3,052.80	6.18 [4]	$397.50	$2,456.55
David Weisman	2025	1.75	125	D.25-05-017 approved rate for 2024 plus 3.46% ALJ-393 COLA, rounded to nearest $5	218.75	1.75	$125.00	$218.75
					Subtotal: $3,828.05			***Subtotal: $3,238.80***
					TOTAL REQUEST: $145,808.85			***TOTAL AWARD: $139,592.10***

CLAIMED	CPUC AWARD
*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award. **Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate	

ATTORNEY INFORMATION			
Attorney	**Date Admitted to CA BAR[2]**	**Member Number**	**Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation**
John Geesman	June 28, 1977	74448	No

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

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Time Records of John Geesman
3	Time Records of David Weisman
4	Spreadsheet Verification of Calculation
5	John Geesman Retainer Agreement
Comment #1	John Geesman is a consultant to A4NR, not a staff member. His 2012 contingent fee retainer agreement with A4NR, which remains in full force and effect, was determined by D.25-05-017 to satisfy Commission policy on consultant compensation: "Geesman has been hired on a contingency basis, where the consultant has not billed or collected compensation for the work performed until the final award is given. Given this contingency, we therefore utilize the reasonable rates established by Resolution ALJ-393 based on Geesman's experience."
Comment #2	A4NR requests that any COLA adopted pursuant to ALJ-393 for 2026 be applied to John Geesman's 2026 hours.

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

[3] Attachments not included in the final Decision.

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] John Geesman 2025 Hourly Rate and 2025 & 2026 Intervenor Compensation Rates	A4NR confirms that Geesman 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.[4] Per the IComp Program Guide at 24, the Commission may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§ 1804(d)). A4NR has confirmed that per the terms of their contract, Geesman has been hired on a contingency rate basis, meaning that Geesman has agreed to defer its consulting fee contingent upon receipt of this Intervenor Compensation award. Given this contingency, we utilize the reasonable rates established by Resolution ALJ-393 based on Geesman's experience as a Legal – Attorney – Level V. Given that the 2025 rate range for Legal – Attorney – Level V is $585.41 to $797.23, we find the requested 2025 hourly rate of $780.00 to be reasonable, and approve it here. We apply one-half of Geesman's approved 2025 hourly rate for an Intervenor Compensation Claim Preparation rate of $390.00. Given that the 2026 rate range for Legal – Attorney – Level V is $608.11 to $820.83, we find the requested 2026 hourly rate of $805.00 to be reasonable, and approve it here. We apply one-half of Geesman's approved 2026 hourly rate for an Intervenor Compensation Claim Preparation rate of $402.50. The award determined herein for Geesman's contribution in this proceeding shall be paid in full to Geesman, and no portion of this part of the award shall be kept by A4NR. Additionally, the rates approved here are specific to work in this proceeding and the contract terms between the consultant and intervenor, as they are established in accordance with the Commission's policy on consultant compensation, and the understanding that the consultant has not billed or collected compensation for the work performed until the final award is given. We reiterate that it is the responsibility of the intervenor to be forthcoming about engaging consultants and the terms of the contract, to adhere to the Commission's policy on compensation for consultant fees, and to provide the appropriate documentation with the initial claim to ensure efficient processing, and thus avoid the need for the Commission to request supplemental documentation. In this instance, A4NR did not provide all the

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

Item	Reason
	documentation pertaining to the contract terms between Intervenor and Consultant in the initial claim and waited until the Commission requested supplemental documentation which delays the processing of the claim.
[2] Weisman's 2025 Hourly Rate and 2025 Intervenor Compensation Rate	D.26-02-021 approved a 2025 hourly rate of $250.00 for 2025. We apply one-half of Weiman's approved 2025 hourly rate for an Intervenor Compensation Claim Preparation rate of $125.00.
[3] Weisman's Hours	**Inefficient Efforts: (22.51 hours reduced)** The Commission compensates intervenors for reasonable and efficient participation that contributes to the development of the record and aids in decision-making. Here, all work was produced by Geesman in this proceeding, while Weisman's claimed hours were limited to "reviewing and analyzing" such work. Geesman is an attorney and A4NR has not demonstrated how Weisman's review provided a distinct or substantive contribution beyond work already performed by counsel, or how it added value. Also, A4NR has not established the need for an Expert – Communication Specialist – Level IV in this proceeding or identified any specific contribution requiring Weisman's specialized expertise. Based on the record, one representative would have been sufficient, given the scope of the issues WEM participated in. We find that this was inefficient that did not provide added value to the proceeding. Therefore, Weisman's claimed hours of 22.51 hours are reduced, except for hours directly related to Intervenor Compensation activities and ex-parte communications to ensure that only reasonable and non-duplicative efforts are compensated. The IComp hours awarded is 1.75 hours and awarded hours for ex-parte communication hours is 0.87 hours.
[4] Intervenor Compensation Preparation Hours	The intervenor compensation claim was adjusted accordingly to correct formatting issues, including inconsistent fonts, incomplete fields, and missing information in the Appendix. As such, we disallow 1.50 hours from Geesman's 2025 IComp preparation hours.

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. Alliance for Nuclear Responsibility has made a substantial contribution to D.25-12-007.

2. The requested hourly rates for Alliance for Nuclear Responsibility'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 $139,592.10.

CONCLUSION OF LAW

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

ORDER

1. Alliance for Nuclear Responsibility is awarded $139,592.10.

2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company shall pay Alliance for Nuclear Responsibility 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 April 15, 2026, the 75th day after the filing of Alliance for Nuclear Responsibility'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
KAREN DOUGLAS
DARCIE HOUCK
CHRISTINE HARADA
MATTHEW BAKER
Commissioners

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D2610073	**Modifies Decision?**	No
Contribution Decision(s):	D2512007		
Proceeding(s):	A2503015		
Author:	ALJ Jack Chang		
Payer(s):	Pacific Gas and Electric Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Alliance for Nuclear Responsibility	January 30, 2026	$145,808.85	$139,592.10	N/A	*See* Part III.D CPUC Comments, Disallowances, and Adjustments above.

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
John	Geesman	Attorney[5]	795 + COLA	2026	$805.00
John	Geesman	Attorney[5]	795	2025	$795.00
David	Weisman	Advocate	250	2025	$250.00

(END OF APPENDIX)

[5] John Geesman is a consultant for A4NR.