Decision 26-11-031 November 19, 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 (U39E).	Application 25-03-015 (Filed March 28, 2025)

GRANTING COMPENSATION TO THE UTILITY REFORM NETWORK FOR SUBSTANTIAL CONTRIBUTION TO DECISION 25-12-007

Intervenor: The Utility Reform Network	**For contribution to Decision (D.) 25-12-007**
Claimed: $196,265	**Awarded: $190,895.00**
Assigned Commissioner: Karen Douglas	**Assigned ALJ: Jack Chang**

PART I: PROCEDURAL ISSUES

A. Brief description of 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. Also approves PG&E's Volumetric Performance Fees spending plan and addresses other matters relating to Diablo Canyon.

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

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	05/30/2025	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	06/06/2025	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.25-03-015	Verified
6. Date of ALJ ruling:	07/08/2025	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.25-03-015	Verified
10. Date of ALJ ruling:	07/08/2025	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:	12/09/2025	Verified
15. File date of compensation request:	2/06/2026	Verified
16. Was the request for compensation timely?		Yes

[1] 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. TRANSITION COSTS TURN's testimony and briefs note that PG&E's application and testimony did not identify any Diablo Canyon transition costs recovered through funds provided under the $1.4 billion Department of Water Resources (DWR) loan. TURN referenced PG&E's sworn statements in federal court including a "Transition and License Renewal Expenditure Summary" (TLRES) that indicated transition costs in excess of the DWR loan amount. As a result of PG&E's refusal to present these costs, or to respond to data requests on this topic, TURN pointed to the significant risk that some Diablo Canyon costs could have been double recovered or shifted from the DWR loan to ratepayers without any transparency. TURN urged the commission to require PG&E to identify the specific excess transition costs identified in the TLRES and clarify any intention to recover these costs in customer rates. The Decision finds that TURN and other intervenors "raise legitimate concerns that PG&E may be recovering, in this	Ex. TURN-1, Direct Testimony of William Monsen, pages 52-57 TURN opening brief, pages 10-15 TURN reply brief, pages 5-6 TURN opening comments on Proposed Decision, pages 11-14	Verified

application, overspending on DCPP transition and renewal costs in excess of the $1.4 billion DWR loan". (page 25) The Decision further agrees that "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." Based on these concerns, the Decision requires PG&E, in future Diablo Canyon cost recovery proceedings, to "disclose 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 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." (pages 25-26)	D.25-12-007, pages 25-26, 77-78, Ordering Paragraph 5.	

2. FIXED MANAGEMENT FEE TURN's testimony noted that PG&E failed to present any data that would permit the calculation of Fixed Management Fee (FMF) escalation using the generation capital escalation methodology approved in D.24-12-033. Because PG&E refused to respond to TURN's data requests on this topic, TURN calculated alternative escalation factors using relevant escalation values obtained from PG&E's General Rate Case application. When PG&E presented new generation capital escalators in response to a ruling from the ALJ, TURN identified significant discontinuities with historic data which raised serious questions about the reliability of the new dataset. TURN further expressed concerns with PG&E proposing a new escalation methodology only months after the adoption of D.24-12-033 and urged the Commission not to allow PG&E to continue to propose new methodologies and data sets in future proceedings. TURN also asked the Commission to prevent PG&E from recalculating multiple prior years of escalation in any future proceeding. TURN argued that PG&E's efforts to claim confidential treatment for publicly available	Ex. TURN-1, Testimony of William Monsen, pages 9-22 TURN opening brief, pages 4-8. TURN reply brief, pages 1-5. TURN opening comments on PG&E Update Testimony, pages 1-2. Ex. TURN-5, Testimony of William Monsen TURN opening comments on Proposed Decision, pages 1-3 TURN reply comments on Proposed Decision, pages 3-4. TURN opening brief, pages 7-8.	Verified

Consumer Price Index data was contrary to Commission policy and violated General Order 66-D. In response to TURN's concerns, PG&E made the CPI escalation data public in its Update Testimony.	PG&E Update Testimony, October 8, 2025, page 7.	
In response to TURN's prepared testimony noting the absence of any data that would allow the Commission to calculate Fixed Management Fee escalation consistent with the methodology approved in D.24-12-033, the ALJ issued two separate rulings. The first ruling directed PG&E to submit "a calculation of and workpapers for the 2026 fixed management fees using the escalation factor methodology authorized in Decision 24-12-033 by no later than September 8, 2025." (August 29 Ruling, page 2) In response to a TURN exhibit entered into the record during evidentiary hearings highlighting discontinuities in generation capital escalation data presented in A.24-03-018 and in PG&E's response to the August 29th Ruling, the ALJ issued a second ruling directing PG&E to include additional information explaining the "dramatic shift" between the escalation factors used in A.24-03-018 and those presented in PG&E's September 8th supplemental filing.	ALJ Ruling Directing Filing of Additional Information on September 8, 2025, August 28, 2025 Evidentiary hearing transcript, September 9, 2025, pages 14-15 Ex. TURN-4, PG&E workpapers from A.24-03-018 ALJ Ruling Directing Filing of Additional Information on October 8, 2025, pages 2-3.	
Although the final Decision does not adopt TURN's recommended changes to PG&E's proposed calculation	D.25-12-007, pages 34-35.	

of the 2027 Fixed Management Fee using the cumulative CPI-U values, the Decision does require PG&E to limit any future escalation to incremental annual changes relative to "the Fixed Management Fee approved in the previous year's DCPP application." (page 35) This limitation rejects PG&E's request to be allowed to revise prior year escalation based on newly discovered historical inflation values.	PG&E opening comments on Proposed Decision, pages 3-4.	

3. RESOURCE ADEQUACY SUBSTITUTION COSTS TURN noted that PG&E's application and testimony calculated substitution capacity costs and capacity benefits of Diablo Canyon using 2025 Forecast Market Price Benchmark (MPB) for System Resource Adequacy (RA). TURN supported the use of this valuation method but noted that the 2025 forecast values were "wildly inflated" and pointed to the recently adopted changes in D.25-06-049 that would result in much lower 2025 System RA MPB values. TURN also urged the Commission to consider adopting monthly RA values once they are developed in R.25-02-005. The Decision approves the use of the revised RA MPB to calculate substitution capacity costs and takes note of the "substantial modifications to the RA MPB methodology" adopted in D.25-06-049 that lowered the requested Diablo Canyon revenue requirement by almost $28 million.	Ex. TURN-1, Testimony of William Monsen, pages 22-32 TURN opening brief, pages 8-10 TURN opening comments on PG&E Update Testimony, pages 1-2. D.25-12-007, pages 44-45.	Verified

4. VOLUMETRIC PERFORMANCE FEES TURN identified significant concerns regarding PG&E's Volumetric Performance Fees (VPF) spending plan including the failure to demonstrate an alignment with the guiding principle of affordability adopted in D.25-06-002. TURN also identified opportunities for PG&E to use VPFs applied to "Safety and Risk" and Power Generation programs to benefit shareholders rather than support incremental work that benefits ratepayers. TURN additionally argued that the Commission has the authority to modify or reject PG&E's VPF spending plan, a position opposed by PG&E and the Coalition of California Utility Employees. In response to TURN's concerns about the use of VPFs to cover selective overspending, PG&E agreed to limit the application of VPFs for "Safety and Risk" programs where spending in both the Major Work Category and Maintenance Activity Type are above authorized imputed amounts. In its discussion of this issue, the Decision notes this commitment from PG&E. Consistent with TURN's arguments, the Decision affirms that the Commission has the ability to "modify or reject PG&E's proposed	Ex. TURN-1, Testimony of William Monsen, pages 33-52 TURN opening brief, pages 15-31 TURN reply brief, pages 7-14 TURN opening comments on Proposed Decision, pages 3-11 TURN reply comments on Proposed Decision, pages 1-3 Ex. PG&E-3, PG&E rebuttal testimony, page 6-21. PG&E opening brief, page 50 D.25-12-007, page 73	Verified

spending" of VPFs (page 71). The Decision found TURN's concerns regarding potential shareholder benefits to be "well-intentioned but overly speculative" (page 72) The Decision agreed with TURN that PG&E failed to adequately explain how VPF spending aligns with the principle of reducing upward pressure on rates as required in D.25-06-002. Based on TURN's critique, the Decision encourages PG&E "to provide more 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." (page 73)	D.25-12-007, pages 71-74	

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?	Y	Yes
b. Were there other parties to the proceeding with positions similar to yours?	Y	Yes
c. If so, provide name of other parties: Energy Producers and Users Coalition (EPUC), the Alliance for Nuclear Responsibility (A4NR)		Noted; other parties also include WEM, SBUA and CARE
d. Intervenor's claim of non-duplication: TURN presented testimony on a wide range of issues in this proceeding and provided a detailed showing on each of these issues. In particular, TURN's presentation on Fixed Management Fees and Volumetric Performance Fees was far more comprehensive than any other party and included extensive analysis that was not provided by other intervenors. In addition, TURN		Noted

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?	Y	Yes
presented unique evidence and arguments on the major issues it addressed (RA Substitution Capacity costs, Fixed Management Fees, Transition Costs, Volumetric Performance Fees). TURN did engage in some coordination with Cal Advocates to ensure complementary alignment of positions. To the extent that any duplication between parties occurred, it was unavoidable due to the nature of the litigation process and the array of issues addressed. TURN worked diligently to ensure that its involvement uniquely influenced the outcome of the final Decision.		

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: As demonstrated in the substantial contribution section, TURN's participation had a material impact on the outcome of the final decision. TURN's contributions include the following: - Requiring PG&E to disclose, in future proceedings, whether PG&E seeks to shift the burden of any license renewal or transition costs from taxpayers to ratepayers and why such costs are eligible for recovery in rates. - Preventing PG&E from proposing a new methodology for escalation of the Fixed Management Fee in future proceedings and limiting changes to escalation since the last adopted values. - Using updated Market Price Benchmarks to measure the cost of substitution capacity that lowered the revenue requirement by almost $28 million. - Requiring PG&E to provide more quantitative analysis and detail in future cost recovery applications showing how expenditures of Volumetric Performance Fees are providing net benefits to ratepayers. Given these specific contributions, the benefits associated with TURN's participation far exceed the cost of TURN's participation in this proceeding. TURN's claim should be found to be reasonable.	Noted

	CPUC Discussion
b. Reasonableness of hours claimed: TURN devoted the minimum number of hours to reviewing rulings, drafting pleadings, developing testimony, reading comments submitted by other parties, and evaluating proposed decisions. Given the level of success achieved by TURN in this proceeding, the amount of time devoted by staff to the process should be found to be fully reasonable. **Reasonableness of Staffing** <u>Matthew Freedman</u> TURN's lead attorney was Matthew Freedman. Mr. Freedman was responsible for the development of TURN's overall strategy in this proceeding. Mr. Freedman drafted all formal pleadings, assisted with discovery, worked with TURN's expert on the development of testimony, attended the Prehearing conference, represented TURN at evidentiary hearings, drafted TURN's briefs and comments, and participated in ex parte meetings. <u>William Monsen</u> Mr. Monsen, an external consultant to TURN, served as an expert witness on all issues covered by TURN in this proceeding. Mr. Monsen drafted discovery, sponsored two volumes of written testimony, and provided feedback to TURN's attorney on written pleadings addressing the issues within his scope. Mr. Monsen also represented TURN at the Oral Argument due to the unavailability of TURN's attorney. <u>Time spent on Ex Parte communications</u> TURN's request includes hours devoted to *ex parte* meetings. These hours include time spent making the initial request, preparing for the meetings, participating in the meetings, and drafting the required post-meeting *ex parte* notices. These notices cannot reasonably be prepared by non-attorney staff due to the need to accurately summarize the topics addressed. The Commission should find that hours spent on these *ex parte* communications represent the "reasonable costs of preparation for and participation in a hearing or proceeding." (Cal. Pub. Util. Code §1803) and that hours spent by advocates reflect costs "incurred by the customer in preparing or presenting" (§1802(j)) TURN's arguments to the Commission. As noted in TURN's *ex parte* notices, the primary subject of these meetings was to express concerns about elements of the Proposed Decision	Noted, *See* Part III.D CPUC Comments, Disallowances, and Adjustments below.

	CPUC Discussion
that addressed Fixed Management Fee escalation, Transition Costs, and the Volumetric Performance Fees. The final decision made adjustments favorable to TURN's position to the sections on Fixed Management Fee escalation and Transition costs. (*See* Rev 1 Proposed Decision, December 2, 2025). The time devoted to drafting TURN's notices relating to *ex parte* meetings are required by law, include information that is substantive in nature (description of topics discussed) and must be signed by the attorney representing the party (cannot be signed by other staff). The Commission has routinely approved compensation for *ex parte* activities by intervenors in decisions dating back for more than 20 years. A sampling of prior decisions awarding compensation for time devoted to *ex parte* communications include (but are not limited to) D.25-10-059, D.24-09-049, D.24-01-024, D.23-10-013, D.23-06-045, D.22-08-050, D.22-08-010, D.22-06-018, D.21-12-051, D.21-08-033, D.21-06-016, D.21-07-017, D.21-04-013, D.19-10-020, D.19-10-018, D.19-08-032, D.19-07-020, D.19-03-005, D.18-11-043, D.18-04-021, D.15-08-023, D.12-08-041. <u>Compensation Request</u> TURN's request also includes 9.5 hours devoted to the preparation of compensation-related filings. The time devoted to this compensation request is appropriate and should be found to be reasonable.	
c. Allocation of hours by issue: TURN has allocated all attorney time by issue area or activity, as evident on our attached timesheets. The following codes relate to specific substantive issue and activity areas addressed by TURN. TURN also provides an approximate breakdown of the number of hours spent on each task and the percentage of total hours devoted to each category. **General Participation (GP) – 37.75 hours – 11.43% of total** General Participation work essential to participation that typically spans multiple issues and/or would not vary with the number of issues that TURN addresses. This includes reviewing multi-issue pleadings, testimony submitted by PG&E and other tasks not allocable to a particular issue. **Brief General (BRIEFGEN) – 15.5 hours – 4.69% of total** Work developing TURN's opening and reply briefs, comments on fall update testimony, and comments on the Proposed Decision on issues not specifically captured by other codes. **Coordination (COORD) – 2.5 hours – 0.76% of total**	Noted, totals 100.01%

	CPUC Discussion
Coordination with other parties to inform TURN's efficient and effective participation and minimize duplication. Includes preliminary outreach regarding possible settlement. **CPUC-ordered activities (CPUC) – 22.75 hours – 6.89% of total** Time devoted to reviewing CPUC rulings and Proposed Decisions, preparing for (and participating in) the Prehearing Conference, participating in CPUC-required meet-and-confer, and preparation and participation in the December 1 oral argument. **Discovery (DISC) – 24.5 hours – 7.42% of total** Development of discovery requests and responses by TURN staff. Review of discovery responses by PG&E and other parties. **Evidentiary Hearings (EH) – 9.25 hours – 2.80% of total** Preparation for, and participation in, CPUC evidentiary hearings in this proceeding. **Ex Parte (EXPARTE) – 5.5 hours – 1.67% of total** Preparation for, participation in, and reporting on Ex Parte meetings with Commissioner Advisors. **Fixed Management Fee (FMF) – 85.00 hours – 25.74% of total** Review of PG&E's Fixed Management Fee escalation proposal, development of alternative data to support the methodology adopted in D.24-12-033, evaluation of revised data presented by PG&E prior to (and after) evidentiary hearings and additional review of discontinuities in generation capital escalation data presented by PG&E. **Resource Adequacy Capacity Substitution Costs (RA) – 24.50 hours – 7.42% of total** Work relating to the use of the recently revised Resource Adequacy Market Price Benchmarks to value Diablo Canyon capacity substitution and capacity benefits. **Testimony General (TESTGEN) – 21.00 hours – 6.36% of total** Work developing TURN's testimony on issues not specifically captured by other codes. **Transition Costs (TRANSITION) – 16.75 hours – 5.07% of total** Work on determining whether PG&E's transition costs to be recovered via the $1.4 billion taxpayer-funded loan were also being recovered in customer rates and developing recommendations for greater transparency and accountability.	

	CPUC Discussion
Volumetric Performance Fees (VPF) – 65.25 hours – 19.76% of total Evaluation of PG&E's 2026 Volumetric Performance Fees spending plan, development of recommendations to prevent impermissible shareholder enrichment, and proposals for ensuring that VPF spending aligns with affordability goals. **Compensation – 9.5 hours** Time spent on the preparation of compensation-related pleadings. --- TURN submits that under the circumstances this information should suffice to address the allocation requirement under the Commission's rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Matthew Freedman, TURN Attorney	2025	148.00	$795	D.25-10-059	$117,660.00	145.50 [3]	$795.00 [1]	$115,672.50
William Monsen, MRW & Associates	2025	182.25	$410	D.25-10-059 + Res ALJ-393; See Comment #1	$74,722.50	174.00 [4]	$410.00 [2]	$71,340.00
				Subtotal: $192,382.50				***Subtotal:* $187,012.50**
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Matthew Freedman, TURN Attorney	2025	1.00	$397.5	50% of 2025 Hourly Rate	$397.50	1.00	$397.50 [1]	$397.50
Matthew Freedman, TURN Attorney	2026	8.50	$410	50% of 2026 Hourly Rate; See Comment #2	$3,485.00	8.50	$410.00 [1]	$3,485.00

CLAIMED	CPUC AWARD
Subtotal: $3,882.50	***Subtotal: $3,882.50***
TOTAL REQUEST: $196,265.00	***TOTAL AWARD: $190,895.00***

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

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

ATTORNEY INFORMATION			
Attorney	**Date Admitted to CA BAR[2]**	**Member Number**	**Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation**
Matthew Freedman	March 29, 2001	214812	No

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

Attachment or Comment #	Description/Comment
Attachment 1	**Certificate of Service**
Attachment 2	**Attorney and Experts Time Sheet Detail**
Attachment 3	**MRW consulting agreement and April 2025 invoice**
Attachment 4	**TURN hours Allocated by Issue**
Comment #1	**2025 Hourly Rate for William Monsen** TURN requests that the Commission adopt a 2025 hourly rate of $410 for TURN External Consultant William Monsen. This rate is equal to the rate authorized by the Commission in D.25-10-059 for Mr. Monsen's work for 2024 ($395) adjusted by the annual escalation methodology adopted in Resolution (Res.) ALJ-393. The annual escalation methodology adopted in Res. ALJ-393 is based on the annual percentage change in the Bureau of Labor Statistics Employment Cost Index, Table 5, for the Occupational Group "Management,

[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.

Attachment or Comment #	Description/Comment
	Professional, and Related excluding Incentive Paid Occupations." (Res. ALJ-393, p. 4; Intervenor Compensation Market Rate Study, Final Report, p. 8). The percent change for this occupational group for the 12-months ended December 2024 is 3.46% (*See* https://www.bls.gov/news.release/eci.t05.htm). The application of this escalation to Mr. Monsen's 2024 rate yields $408.67 which is rounded to $410 (the nearest $5 increment). Mr. Monsen charged TURN $410 for his work in 2025. In attachment 3, TURN provides a written agreement for 2025 assigning Mr. Monsen a $410 hourly rate and an invoice for April 2025 showing a $410 hourly rate. These documents demonstrate that TURN was billed the rates being sought in this compensation request for Mr. Monsen's services in both years.
Comment #2	**2026 Hourly Rate for Matthew Freedman** TURN requests that the Commission adopt a 2026 hourly rate of $820 for TURN Staff Attorney Matthew Freedman. This rate is equal to the rate authorized by the Commission in D.25-10-059 for Mr. Freedman's work in 2025 ($795) adjusted by the annual escalation methodology adopted in Resolution (Res.) ALJ-393. The annual escalation methodology adopted in Res. ALJ-393 is based on the annual percentage change in the Bureau of Labor Statistics Employment Cost Index, Table 5, for the Occupational Group "Management, Professional, and Related excluding Incentive Paid Occupations." (Res. ALJ-393, p. 4; Intervenor Compensation Market Rate Study, Final Report, p. 8). The percent change for this occupational group for the 12-months ended September 2025 is 3.3% (*See* https://www.bls.gov/news.release/eci.t05.htm). At the time of filing this request, the latest 12-month data released by BLS ended with September 2025. The application of this escalation to Mr. Freedman's 2025 rate yields $821.23 which is rounded to $820 (the nearest $5 increment).

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Matthew Freedman 2025 and 2026 Rates and Intervenor	D.25-10-059 approved a 2025 hourly rate of $795 for Freedman. As Intervenor Compensation Claim Preparation hours are compensated at half the preparer's standard hourly rate, we apply the rate of $397.50 for Freedman. The 2026 rate range for a Legal – Attorney – V is $608.11 to $820.83. With the application of the 3.35% escalation factor for 2026 using Resolution ALJ-

Item	Reason
Compensation Rates	393, we approve a 2026 hourly rate of $820 for Freedman, rounded to the nearest five dollars. As Intervenor Compensation Claim Preparation hours are compensated at half the preparer's standard hourly rate, we apply the rate of $410 for Freedman.
[2] William Monsen 2025 Hourly Rate	TURN has confirmed that William Monsen 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.[4] 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 (§1804(d)). TURN has confirmed that it paid William Monsen $410.00 per hour for work in this proceeding in 2025. We find this rate reasonable given Monsen's experience and approve this rate here. The award determined herein for Monsen's contribution in this proceeding shall be paid in full to Monsen, 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, 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, TURN did not provide all the 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.

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

Item	Reason
[3] Freedman 2025 hours	NDA Work (0.75 hours): NDAs constitute preparatory work rather than an analysis or advocacy that shaped the Commission's decision, and TURN has not demonstrated a clear connection between NDA related hours and its substantive input. Additionally, activities such as executing or reviewing NDAs are considered administrative and procedural which attorneys are not compensated for, as such work has been factored into the established rates. See the Intervenor Compensation Program Guide at 12. Therefore, the following hours have been reduced: • 05/22/2025: Review and execution of NDA, 0.25 hours Administrative/Clerical (0.50 hours) 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 disallow hours for the activities below: • 05/23/2025: Email to PG&E re: confidentiality issues (conflict between workpapers and testimony), 0.25 hours • 09/04/2025: Provide information to CPUC staff re: upcoming hearing, 0.25 hours Ex-Parte Communication (1.25 hours) Ex parte meetings and reasonable preparation time are compensable. However, the record does not demonstrate that all of the claimed preparation time was necessary for the ex parte meeting or contributed meaningfully to the Commission's decision-making process, particularly where the presentation relied solely on the existing record and did not introduce new findings, analysis, or substantive information. We therefore disallow the time claimed for drafting ex parte notices, as this work is clerical in nature and does not constitute substantive preparation. We compensate the reasonable time spent preparing for and participating in the ex parte meeting. Accordingly, we reduce the claimed preparation time by 1.25 hours and approve 4.00 hours for ex parte preparation associated with the November 13, 2025, 30-minute meeting with Commissioner Houck and Baker's Office.

Item	Reason
[4] William Monsen 2025 hours	NDA Work (1.00 hours): NDAs constitute preparatory work rather than an analysis or advocacy that shaped the Commission's decision, and TURN has not demonstrated a clear connection between NDA related hours and its substantive input. Therefore, the following hours have been disallowed: • 04/24/2025: Notes to M. Freedman re: NDA (including signing NDA) and issues for protest, 1.00 hours Vagueness (2025: 7.25 hours): The following activities are reduced because they are vague and lack the necessary detail to demonstrate how they contributed to the decision-making process: • 06/25/2025: Analyze trends of spending by PG&E, 3.50 hours • 07/03/2025: Review transition costs, 0.75 hours • 07/11/2025: Escalators available from S&P under subscription, 0.50 hours • 07/13/2025: RA credit and pricing for DCPP, 1.25 hours • 09/09/2025: Review escalation factors from prior GRC, 0.75 hours • 09/30/2025: Updated market price benchmarks, 0.50 hours
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.25-12-007.
2. The requested hourly rates for The Utility Reform Network's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is $190,895.00.

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 $190,895.00.

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 April 22, 2026, the 75th day after the filing of The Utility Reform Network's request, and continuing until full payment is made.

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

This decision is effective today.

Dated November 19, 2026, at Sacramento, California.

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

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D2611031	**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
The Utility Reform Network	02/06/2026	$196,265	$190,895.00	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
Matthew	Freedman	Attorney	$795	2025	$795
Matthew	Freedman	Attorney	$820	2026	$820
William	Monsen	Expert[5]	$410	2025	$410

(END OF APPENDIX)

[5] William Monsen serves as a consultant for TURN.