



December 7, 2020

## VIA ELECTRONIC MAIL

Mr. Ed Randolph  
Director, Energy Division  
California Public Utilities Commission  
505 Van Ness Avenues  
San Francisco, CA 94102

### **Re: Opening Comments on Draft Resolution E-5114**

Dear Director Randolph:

In accordance with Rule 14.5 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure and the notice accompanying Draft Resolution E-5114 ("Draft Resolution"), the California Community Choice Association ("CalCCA") hereby submits these limited opening comments on the Draft Resolution.

### **SUMMARY**

Draft Resolution E-5114 "approves with modifications" the Arrearage Management Program ("AMP") implementation Advice Letters filed by the investor-owned utilities ("IOUs").<sup>1</sup> CalCCA appreciates the modifications ordered in the Draft Resolution and offers these recommended changes:

- ✓ Modify the stated purpose of sharing AMP enrolled unbundled customer information with community choice aggregators ("CCAs") to correctly describe the purpose.
- ✓ Require the IOUs to share unbundled customer enrollment information with CCAs as part of the existing 4013, Customer List, or Customer Reconciliation Report.

Appendix A proposes modifications to the Draft Resolution's findings and orders.

### **COMMENTS**

- 1. The unbundled customer enrollment status information CCAs requested is needed weekly to accurately track the aging of customer account balances and reconcile the debt that will be forgiven.**

---

<sup>1</sup> Draft Resolution at 2.

The Draft Resolution concludes that “monthly reporting of the requested information should be sufficient for tracking and recording costs associated with unbundled customers participating in AMP.”<sup>2</sup> However, the Draft Resolution approves joint cost recovery of forgiven arrears through the Public Purpose Programs charge and the IOUs will record all, including CCA, arrearages forgiven under AMP within the Residential Uncollectibles Balancing Account.<sup>3</sup> Even though IOUs will be recording the costs of the forgiven debt, monthly reporting of the requested customer AMP information<sup>4</sup> hinders a CCA’s ability to accurately track the aging of a customer’s account balance because a CCA will not be able to reconcile payments from the daily 820 remittance files with the forgiven arrearage balances. Timely reconciliation is needed for accurate customer bill presentment. This reconciliation must occur weekly in order to be able to determine whether a customer made their timely payment and should have 1/12 of their generation debt forgiven on their next bill.

Receiving AMP reporting weekly is crucial to ensuring that customers are not mistakenly sent to collections or dropped from service because their AMP debt forgiveness was not applied in a timely manner.<sup>5</sup> Weekly reporting that denotes details pertinent to CCA customers participating in the AMP will prevent customer confusion and prevent AMP unenrollment due to current payments that have not been reconciled and are flagged as missed.

Furthermore, at times retro enrollments occur. In this situation, a CCA may receive information related to a back dated enrollment due to billing system errors a few weeks or months after the customer is enrolled in the AMP. If this situation occurs, the CCA would need to retroactively forgive generation-related arrears on the CCA portion of the customer’s bill and any further delay due to only monthly enrollment reporting would add to customer confusion. If a customer is enrolled in the AMP at the beginning of the month and AMP reporting is shared with the CCA at the end of the month, multiple bill periods could be billed out inaccurately.

Finally, more frequent reporting would also enable CCA call centers to provide accurate and updated information to unbundled AMP customers if they were to call with questions about their bill or status in the program.

To smoothly implement unbundled customer enrollment in the AMP and avoid incorrect invoices being sent to the IOU and billed to the customer, it is imperative that CCAs receive AMP reporting more frequently than just once a month.

**2. Information on unbundled customer enrollment in the AMP should be shared as part of the 4013, Customer List, or Customer Reconciliation Report.**

---

<sup>2</sup> Draft Resolution, p. 12.

<sup>3</sup> Draft Resolution, p. 10.

<sup>4</sup> Information such as enrollment status, forgiven arrears that have been processed, and whether customer is in good standing in the program and has not missed payments.

<sup>5</sup> Each CCA has its own late payment notice and collections policies that could be triggered if the CCA is not informed in a timely manner about a customer’s AMP status.

There are existing reports that can be leveraged to facilitate more frequent reporting of unbundled customer enrollment status in the AMP. For example, the 4013, the Customer List, and the Customer Reconciliation Report could have columns added to the end of the report indicating AMP customer enrollment status.<sup>6</sup> This would reduce the burden on IOUs to create additional reports while also having to manually implement the AMP. CalCCA urges the Commission to adopt this simple solution to facilitate more frequent reporting.

## CONCLUSION

CalCCA appreciates the Draft Resolution's approval of cost recovery for all customers through the Public Purpose Program charge and recommends the Draft Resolution be modified prior to adoption as specified herein to ensure accurate unbundled customer bill presentment and prevent customer confusion.

Respectfully,

CALIFORNIA COMMUNITY CHOICE  
ASSOCIATION



Evelyn Kahl  
General Counsel

cc via email:  
Energy Division Tariff Unit ([edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov))  
Benjamin Menzies ([Benjamin.Menzies@cpuc.ca.gov](mailto:Benjamin.Menzies@cpuc.ca.gov))  
Paul Phillips ([Paul.Phillips@cpuc.ca.gov](mailto:Paul.Phillips@cpuc.ca.gov))  
Service Lists for R.18-07-005 and R.14-03-002

---

<sup>6</sup> These are the names of the reports shared by each IOU with the CCA. They contain customer billing data. Pacific Gas and Electric Company's report is the 4013. Southern California Edison's report is the Customer List. San Diego Gas & Electric Company's report is the Customer Reconciliation Report.

## Appendix A

### **FINDINGS**

6. It is reasonable for the IOUs to provide unbundled customer information for those participating in AMP programs to the customer's CCA through the 4013, Customer List, or Customer Reconciliation Report ~~on a monthly basis~~ and attempt to meet additional requests from participating CCAs to share information that are necessary to accurately reconcile the accounts of track and recover costs for unbundled customers participating in AMP programs.

### **ORDERS**

5. PG&E, SCE, SDG&E, and SoCalGas shall provide information to the customer's CCA through the 4013, Customer List, or Customer Reconciliation Report that is necessary to accurately present bills to ~~on~~ unbundled customers participating in AMP plans ~~at least monthly track and recover costs for unbundled customers participating in AMP programs.~~