



October 5, 2021

**VIA ELECTRONIC MAIL**

Mr. Eric Lee  
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**Re: California Community Choice Association's Comments on Joint Utilities Proposed COVID Debt Relief Small Business Pilot in Compliance with Decision 21-06-036**

Dear Mr. Lee:

Thank you for providing the opportunity to submit comments on the proposed COVID Debt Relief Small Business Pilot (Small Business Pilot) of Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E), and San Diego Gas & Electric (SDG&E) (collectively, the Joint Utilities). The proposal for the Small Business Pilot, as set forth in the Draft Outline provided by the Joint Utilities (Draft Outline) and the Joint Utilities' presentation dated 9/28/21, is in response to the requirement in Decision (D.) 21-06-036 for the Joint Utilities to "work with interested stakeholders to propose a pilot with Small Business customers in disadvantaged communities."<sup>1</sup>

As proposed, the Small Business Pilot would allow the Joint Utilities to provide one-on-one energy management coaching to eligible small business customers on how to best reduce their existing bills, by utilizing IOUs' portfolio of rate options, bill management, load management, and energy savings programs. The Joint Utilities propose that third-party Community Based Organizations (CBOs) would be hired as "Energy Ambassadors" to conduct the pilot. However, during the 9/28/21 presentation, PG&E noted that it may choose to administer the pilot from "in-house," meaning it may not use Energy Ambassadors but instead may use PG&E employees to conduct the outreach.<sup>2</sup> Eligibility for the pilot includes small businesses in disadvantaged communities (DACs) with COVID-related arrearages, in specified cities and/or with a targeted percentage of specific customers (i.e., those with high arrearages). Community Choice Aggregator (CCA) small business customers are eligible to participate in the pilot, although how a CCA customer can participate is unclear.

CalCCA provides the following comments on the Draft Outline and 9/28/21 presentation:

**I. CCAs and CCA Programs Should Be Incorporated into the Small Business Pilot**

The Small Business Pilot should include outreach regarding programs of both the Joint Utilities and CCAs that could have the impact of assisting small business customers to reduce their arrearages and promote sustained bill savings. While the Draft Outline states that "CCA small business customers

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<sup>1</sup> *Decision Addressing Energy Utility Customer Bill Debt Via Automatic Enrollment in Long Term Payment Plans, D.21-06-036 (June 30, 2021) (Covid Debt Decision).*

<sup>2</sup> PG&E also noted that it had not made a final decision on this issue.

are eligible to participate in the pilot,” those CCA small business customers presumably would only receive counseling regarding IOU programs, and not CCA programs, despite all IOU and CCA customers paying for these programs through a Memorandum Account subject to Commission review.<sup>3</sup> Many CCAs have programs that can help small businesses achieve bill savings, load shifting, and energy savings. For example, Marin Clean Energy’s (MCE’s) commercial energy efficiency program provides commercial properties in MCE’s service area with no-cost energy assessments and assistance to install money saving energy efficient equipment, as well as the “MCE Cares Credit” through March 31, 2022 providing a credit for certain small business customers. Clean Power Alliance provides a Peak Management Pricing Program to allow businesses to earn bill credits for powering down equipment during peak periods. Many more CCAs have similar programs.

CalCCA has concerns regarding the Small Business Pilot only providing counseling regarding utility programs, to the exclusion and detriment of CCA programs. CalCCA recommends inclusion of CCAs in the small business pilot similar to the Percentage of Income Payment Plan (PIPP) pilot currently being planned in the Disconnections proceeding, Rulemaking (R.) 18-07-005. If a certain number of small business customers are allowed in the small business pilot, a percentage share of those customers proportional to the customers of a CCA in that utilities’ service territory could be CCA customers, similar to the PIPP pilot. The Energy Ambassadors could be trained in both IOU and CCA programs in that service territory, in order to benefit both bundled IOU customers, and unbundled CCA customers.

## **II. Pilot Eligibility Should Extend Beyond the CalEnviroScreen Definition of a DAC to Include Small Business Customers with the Highest Rates of Arrearages Over the Past 12 Months as Designated by IOUs and CCAs**

The Joint Utilities proposed during the 9/28/21 presentation that DAC small business customers would be identified through the CalEnviroScreen tool of the California Office of Environmental Health Hazard Assessment. Given the widespread financial vulnerability of small businesses as a result of the Covid pandemic, CalCCA suggests that in addition to the CalEnviroScreen tool, the Joint Utilities could utilize eligibility characteristics similar to the PIPP eligibility for IOU and CCA customers. Specifically, CalCCA recommends that the Joint Utilities allow small business customers to be eligible for the small business pilot in zip codes (designated by both IOUs and CCAs) with the highest rates of small business customer arrearages during the past 12 months.

## **III. The Joint Utilities Should Provide Estimated Size and Cost Information to Stakeholders Regarding the Small Business Pilot**

The Draft Outline proposes that “the Commission authorize the budgets proposed in the [Advice Letter] and the IOUs recover the costs through a new two-way balancing account.”<sup>4</sup> The Covid Decision allows the IOUs to track costs of required programs in the existing COVID-19 Pandemic Protection Memorandum Accounts, which will be subject to Commission review.<sup>5</sup> However, the Draft Outline does

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<sup>3</sup> Covid Debt Decision, Ordering ¶7, at 51 (allowing IOUs to recover costs through the COVID-19 Pandemic Protection Memorandum Accounts, which will be subject to Commission review applicable to such memorandum accounts).

<sup>4</sup> Draft Outline at 7.

<sup>5</sup> Covid Debt Decision, Ordering ¶7, at 51.

not provide estimated costs, the potential scope, and the number of potential customers in the Small Business Pilot. If CCAs are able to participate, it is also unclear as to how costs will be recovered. As CCA customers generally will, along with IOU customers, presumably be responsible to pay for the Small Business pilot program (either through the Public Purpose Programs Charge or other customer charge), the estimated costs are an important component of the CCAs' evaluation of this program, and therefore should be furnished to stakeholders.

**IV. Pilot Outreach Should Only Be Conducted by Third Party Energy Ambassadors with Equal Knowledge of IOU and CCA Programs Benefitting Small Business Customers**

During the 9/28/21 presentation, PG&E raised the possibility of conducting the Small Business pilot "in-house," and not using CBOs or third-party Energy Ambassadors to provide the counseling under the pilot. CalCCA has concerns with CCA customers receiving counseling regarding IOU or CCA programs from an IOU employee.<sup>6</sup> In addition, if CCAs are able to participate in the Small Business Pilot, a third-party Energy Ambassador would be best equipped to fairly communicate programs of both IOUs and CCAs. In fact, joint marketing of IOU and CCA programs benefitting small business customers through a single point of contact with a third-party Energy Ambassador would be the most convenient and effective way to reach and assist small business customers in need. Under all circumstances, therefore, a third-party Energy Ambassador would be the best option.

CalCCA thanks the Joint Utilities for their consideration of these comments on the proposed Small Business Pilot.

Respectfully,

CALIFORNIA COMMUNITY CHOICE  
ASSOCIATION

Evelyn Kahl



General Counsel and Director of Policy

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<sup>6</sup> In fact, such communications between an IOU employee and a CCA customer could raise issues under the Code of Conduct governing the treatment of CCAs by IOUs. See *Decision Adopting a Code of Conduct and Enforcement Mechanisms Related to Utility Interactions with Community Choice Aggregators, Pursuant to Senate Bill 790*, D.12-12-036 (Dec. 28, 2012).