



October 18, 2021

VIA ELECTRONIC MAIL

Mr. Edward Randolph
Deputy Executive Director for Energy and Climate Policy
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: California Community Choice Association's (CalCCA's) Response to Southern California Gas Company (SoCalGas) Tier 2 Advice No. 5857-A, San Diego Gas & Electric Company (SDG&E) Tier 2 Advice No. 3829-E-A/3010-G-A, Pacific Gas and Electric Company (PG&E) Tier 2 Advice No. 4483-G-A/6307-E-A, and Southern California Edison Company (SCE) Tier 2 Advice No. 4577-E-A (Supplement - Joint Community Based Organization (CBO) Reporting Template of SoCalGas, SDG&E, PG&E, and SCE, Pursuant to Decision (D.) 21-06-036 Ordering Paragraph (OP) 8.

Dear Mr. Randolph:

Pursuant to the California Public Utilities Commission's (Commission's) General Order (GO) 96-B,¹ the California Community Choice Association² (CalCCA) submits this Response to Southern California Gas Company (SoCalGas) Tier 2 Advice No. 5857-A, San Diego Gas & Electric Company (SDG&E) Tier 2 Advice No. 3839-E-A/3010-G-A, Pacific Gas and Electric Company (PG&E) Tier 2 Advice 4483-G-A/6307-E-A, and Southern California Edison Company (SCE) Tier 2 Advice No. 4577-E-A, submitted on October 6, 2021 (Supplemental AL).³ This Supplemental AL replaces in their entirety (at the request of Commission Energy Division (ED) Staff) the Advice Letters filed by the IOUs on August 30, 2021,⁴ proposing a reporting template outlining the information to be gathered and displayed regarding the IOUs' Community Based Organization (CBO) networks, pursuant to Decision (D.) 21-06-036,

¹ References to "General Rules" are to the general rules identified in General Order 96-B.

² California Community Choice Association represents the interests of 22 community choice electricity providers in California: Apple Valley Choice Energy, Baldwin Park Resident Owned Utility District, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert Community Energy, East Bay Community Energy, Lancaster Choice Energy, Marin Clean Energy, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

³ SoCalGas, SDG&E, PG&E and SCE are referred to herein as the Investor-Owned Utilities (IOUs).

⁴ SoCalGas Advice No. 5857, SDG&E Advice No. 3839-E/3010-G, PG&E Advice No. 4483-G/6307-E, and SCE Advice No. 4577-E.

Ordering Paragraph (OP) 8.⁵ As set forth more fully below, CalCCA supports and recommends approval of the Supplemental AL.

BACKGROUND

The Commission in D.21-06-036 addressed the significant financial impacts on energy utility customers from the COVID-19 pandemic. The decision temporarily suspended disconnections for nonpayment, and established mandatory, automatic amortizations of debt in the form of Covid payment plans for residential and small business customers. Given the mixed record of success of similar payment plans in the past, the Commission paired the payment plans with intensive follow-up efforts by CBOs to residential customers, and intensive follow-up efforts by utilities to small business customers deepest in debt. As a first step toward this enhancement of the Covid payment plans, the Commission ordered the energy utilities to begin documenting their partnerships with CBOs as a means of helping the hardest-to-reach customers navigate the debt relief programs. OP 8 requires the IOUs to file a Tier 2 Advice Letter with “a reporting template that displays their current [CBO] networks, their structures for compensating CBOs, and ... reveals each CBO’s links and benefit delivered to disadvantaged communities, Environmental and Social Justice Communities, Small Business customers, tribes, access and functional needs communities, and other hard-to-reach populations.”⁶ The IOUs jointly filed their original Advice Letters on August 30, 2021. After receiving a request by ED Staff on September 30, 2021 to supplement their AL, the IOUs filed the Supplemental AL.

The Supplemental AL: (1) provides a timeline and scope of information to be provided regarding the CBO network template; (2) provides recommendations concerning the CBO interactive map proposal; (3) acknowledges the need to better define IOU collaboration with, and compensation of, CBOs to help customers become aware of, understand, and enroll in the growing number of assistance programs (such as the Arrearage Management Plan (AMP) and Covid debt relief programs); (4) recommends that the Commission hold stakeholder workshops, where CBOs, IOUs, and other stakeholders can discuss gaps or opportunities regarding CBO networks to help customers navigate relief programs, compensation of CBOs, and cost recovery; and (5) proposes that Commission staff, along with parties at the workshops, determine the universe of programs and proceedings to include in the CBO network (such as demand-side management, electric vehicles, Energy Savings Assistance, CARE/FERA, etc.), and explore the appropriate procedural steps to do so.

RESPONSE

CalCCA supports and recommends that the Commission approve the Supplemental AL. Given the expansion from OP 8 of the scope of CBO issues addressed by the IOUs (in response to ED Staff) in the Supplemental AL, CalCCA agrees with the IOUs that the Commission should order a stakeholder process, with workshops, to discuss the gaps and opportunities regarding the

⁵ D.21-06-036, *Decision Addressing Energy Utility Customer Bill Debt Via Automatic Enrollment in Long Term Payment Plans*, R.21-02-014 (June 30, 2021).

⁶ *Id.*, OP 8 at 51-52.

IOUs' CBO networks to help customers navigate the relief programs, compensation of CBOs, and cost recovery. CalCCA is especially interested in ensuring the accuracy of the information (including information regarding CCA services and programs) provided by CBOs to customers attempting to navigate the various programs and assistance available. In addition, to the extent the Commission expands the universe of programs and proceedings involving the CBO networks, CalCCA is interested in participating in the stakeholder process exploring such expansion and the appropriate steps to do so.

CONCLUSION

CalCCA thanks the Energy Division for its review of this Response to the Supplemental AL.

Respectfully,

CALIFORNIA COMMUNITY CHOICE
ASSOCIATION

Evelyn Kahl



General Counsel and Director of Policy

cc via email:

Energy Division Tariff Unit (edtariffunit@cpuc.ca.gov)

ROrtiz@socalgas.com

Tariffs@socalgas.com

GAnderson@sdge.com

SDGETariffs@sdge.com

AdviceTariffManager@sce.com

Karyn.Gansecki@sce.com

PGETariffs@pge.com

Service Lists: A.14-11-007, A.15-02-001, A.19-09-014, A.19-11-003, A.20-03-014,
R.12-06-013, R.15-03-010, R.18-03-011, R.18-07-005, R.18-07-006, and R.21-02-014.