



November 17, 2021

VIA ELECTRONIC MAIL

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

Re: California Community Choice Association’s Protest of Southern California Edison Company’s Tier 2 Advice Letter 4620-E, Pacific Gas and Electric Company’s Tier 2 Advice Letter 6831-E/4517-G, Southern California Gas Company’s Tier 2 Advice Letter 5888, and San Diego Gas and Electric Company’s Tier 2 Advice Letter 3884-E/3033-G – Joint Submittal Regarding Small Business Customer Outreach Pilot for Disadvantaged Communities

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 protest of Southern California Edison Company’s (SCE’s) Tier 2 Advice Letter 4620-E, Pacific Gas and Electric Company’s (PG&E’s) Tier 2 Advice Letter 6831-E/4517-G, Southern California Gas Company’s (SoCalGas’s) Tier 2 Advice Letter 5888, and San Diego Gas & Electric Company’s (SDG&E’s) Tier 2 Advice Letter 3884-E/3033-G (collectively, the Advice Letter). SCE, PG&E, SoCalGas, and SDG&E (collectively, the IOUs) submitted the Advice Letter on October 28, 2021 to provide the implementation parameters, cost recovery, and timeline for a Small Business Customer Outreach Pilot (Pilot) targeted at Small Business Customers (SBCs) in disadvantaged communities (DACs), as required by Ordering Paragraph (OP) 9 of Decision (D.) 21-06-036.³

CalCCA generally supports the IOUs’ proposal for the Pilot, with two exceptions. Specifically, CalCCA protests and requests modification of the Advice Letter to:

- 1) Explicitly allow CCA SBCs to participate in the Pilot; and

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 23 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, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

³ D.21-06-036, *Decision Addressing Energy Utility Customer Bill Debt Via Automatic Enrollment in Long Term Payment Plans*, R.21-02-014 (June 24, 2021), OP 9 at 52.

- 2) Define how a “single statewide implementer” for the Pilot will choose and oversee the “Energy Ambassadors,” and ensure that the “Energy Ambassadors” will be appointed from existing Community Based Organizations (CBOs) that already have existing relationships with local communities.

BACKGROUND

The Advice Letter was filed as required by OP 9 of D.21-06-036, directing the IOUs to file a Tier 2 Advice Letter proposing a pilot plan “for outreach and verbal counseling to [SBCs] in [DACs] on appropriate programs, incentives and rates available to lower their bills.”⁴ D.21-06-036 established COVID-19 Relief Payment Plans for SBCs. However, the Commission highlighted the importance of ongoing support to increase the customers’ chances of success under the payment plans.⁵ D.21-06-036 also required the IOUs to “work with interested stakeholders” to formulate the Pilot.

On September 28, 2021, the IOUs held a workshop to present a framework for the Pilot. Comments on the framework were provided to the IOUs by CalCCA on October 5, 2021. CalCCA’s comments were largely incorporated in the Advice Letter, including that: (1) CCA program information be incorporated into the Pilot; (2) that the IOUs provide estimated size and cost information to stakeholders regarding the Pilot; and (3) that Pilot outreach should only be conducted by third party energy ambassadors that have equal knowledge of IOU and CCA programs benefitting SBCs.⁶

PROTEST

1. CCA SBCs in DACs Should Be Eligible to Participate in the Pilot

With respect to “customer participation criteria,” the Advice Letter states that “the [IOUs] propose to target [SBCs] that are located in a DAC, . . .”⁷ The draft framework proposed to stakeholders by the IOUs on September 28 noted that “CCA [SBCs] are eligible to participate in the pilot.” However, the Advice Letter does not explicitly provide for CCA SBC participation. CalCCA requests that the IOUs be required to explicitly allow participation in the Pilot of CCA SBCs in DACs.

2. The Commission Should Require the IOUs to Select the “Single Statewide Implementer” from CBOs With Existing Relationships in Local Communities

The Utilities propose to hire and utilize a “single statewide implementer” for the Pilot.⁸ The Advice Letter states that “[t]he use of a statewide implementer would allow for customers across

⁴ *Id.*

⁵ *Id.* at 38.

⁶ Not included in the Advice Letter, however, was CalCCA’s recommendation that 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 twelve months as designated by IOUs and CCAs.

⁷ Advice Letter at 3.

⁸ *Id.* at 6.

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different utility service areas to receive consistent messaging from the Energy Ambassadors.”⁹ CalCCA appreciates that the Advice Letter allows both the IOUs *and* CCAs to “define and provide guidance and training to the statewide implementer on marketing and communications” to ensure offerings of both the IOUs and CCAs are accurately communicated by the Energy Ambassadors.¹⁰ However, the Pilot should be modified to define how the “single statewide implementer” will choose and oversee the “Energy Ambassadors” that will provide counseling to SBCs in DACs statewide. While CalCCA does not object to a centralized “single statewide implementer,” the “Energy Ambassadors” themselves should be appointed from existing CBOs that have existing relationships within local communities. The existing relationships CBOs have with small businesses can then be leveraged to ensure that customers most in need are located and provided assistance. CalCCA therefore requests that the IOUs be required to ensure the “Energy Ambassadors” are not new to a community, but rather are chosen from trusted local CBOs.

CONCLUSION

CalCCA thanks the Energy Division for its review of this protest, and requests that the IOUs be required to modify the Pilot as set forth herein.

Respectfully,

CALIFORNIA COMMUNITY CHOICE
ASSOCIATION

Evelyn Kahl



General Counsel and Director of Policy

cc via email:

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

AdviceTariffManager@sce.com

Karyn.Gansecki@sce.com

PGETariffs@pge.com

ROrtiz@socalgas.com

Tariffs@socalgas.com

GAnderson@sdge.com

SDGETariffs@sdge.com

Service List: [R.21-02-014](#)

⁹ *Id.*

¹⁰ *Id.*