BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Consider
New Approaches to Disconnections and
Reconnections to Improve Energy Access
and Contain Costs.  

Rulemaking 18-07-005

CALIFORNIA COMMUNITY CHOICE ASSOCIATION’S
REPLY COMMENTS ON ASSIGNED COMMISSIONER’S PHASE 2
SCOPING MEMO AND RULING

Evelyn Kahl,
General Counsel and Director of Policy
Leanne Bober,
Senior Policy Analyst
CALIFORNIA COMMUNITY CHOICE ASSOCIATION
One Concord Center
2300 Clayton Road, Suite 1150
Concord, CA 94520
Telephone: (415) 254-5454
E-mail: regulatory@cal-cca.org

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SUMMARY OF RECOMMENDATIONS

- The California Public Utilities Commission (Commission) should reject Pacific Gas and Electric Company’s (PG&E’s) recommendation to wait three years prior to modifying the Arrearage Management Plan (AMP), and adopt CalCCA’s proposals in Opening Comments to encourage retention of customers through the entire 12-month AMP program to ensure full arrearage forgiveness;

- The Commission should convene a workshop as recommended by PG&E, Southern California Edison Company (SCE), The Utility Reform Network (TURN), Center for Accessible Technology, National Consumer Law Center (CforAT), and CalCCA to discuss AMP, payment plans, increasing customer outreach, and disconnection issues; and

- The Commission should adopt TURN’s and the Utility Consumers’ Action Network’s (UCAN’s) recommendation that the investor-owned utility (IOU) Medical Baseline study be updated on a regular basis to ensure timely medical baseline population information.
CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
REPLY COMMENTS ON ASSIGNED COMMISSIONER’S PHASE 2
SCOPING MEMO AND RULING

The California Community Choice Association\(^1\) (CalCCA) submits these Reply Comments in response to the *Assigned Commissioner’s Phase 2 Scoping Memo and Ruling* (Ruling), issued on July 15, 2022.

I. INTRODUCTION

Party Opening Comments demonstrate the confluence of factors currently impacting customer arrearages, enrollment in assistance programs, and disconnection potential. The Commission must ensure effective program design providing adequate customer access to the various forms of assistance and payment plans. While the California Arrearage Payment Program (CAPP) will likely assist most customers in paying off arrearages from the COVID period (May 4, 2020 – June 15, 2021), customers whose arrearages arose either before or after that period may require further assistance. In furtherance of the goals of reducing arrearages,

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assisting customers in need of financial assistance to pay utility bills, encouraging on-time payments, and preventing future disconnections, CalCCA provides the following recommendations in response to Opening Comments:

- The Commission should reject Pacific Gas and Electric Company’s (PG&E’s) recommendation to wait three years prior to modifying the Arrearage Management Plan (AMP), and adopt CalCCA’s proposals in Opening Comments to encourage retention of customers through the entire 12-month AMP program to ensure full arrearage forgiveness;

- The Commission should convene a workshop as recommended by PG&E, Southern California Edison Company (SCE), The Utility Reform Network (TURN), Center for Accessible Technology, National Consumer Law Center (CforAT), and CalCCA to discuss AMP, payment plans, increasing customer outreach, and disconnection issues; and

- The Commission should adopt TURN’s and the Utility Consumers’ Action Network’s (UCAN’s) recommendation that the investor-owned utility (IOU) Medical Baseline Study be updated on a regular basis to ensure timely medical baseline population information.

II. THE COMMISSION SHOULD REJECT PG&E’S RECOMMENDATION TO DELAY MODIFICATIONS TO AMP AND ADOPT CALCCA’S PROPOSALS TO ENCOURAGE CUSTOMER RETENTION

PG&E recommends the Commission wait at least three years to modify the AMP program design to allow for the collection of sufficient data to understand where there may be opportunities for improvement.\(^2\) In addition, PG&E points out that changing program rules may confuse customers at the same time PG&E has refined its marketing and outreach efforts, especially regarding enrollment.\(^3\)

CalCCA proposed two modifications to AMP in its Opening Comments that will relax the rules for staying enrolled and reenrolling after being dropped from the program for non-payment.\(^4\) CalCCA’s recommendations include: (1) allowing payments of 50 percent or more of

\(^2\) PG&E Opening Comments at 2.
\(^3\) Id.
\(^4\) CalCCA Opening Comments at 6-7.
a monthly amount due to qualify as an “on-time payment,” thereby ensuring a customer can collect its monthly debt forgiveness, and (2) reducing the waiting period for re-enrollment from 12 to six months.\(^5\) CalCCA’s recommendations are based on the experience of community choice aggregators (CCAs) that customers tend to drop out of the program in the last several months, preventing the opportunity to receive full debt forgiveness.\(^6\) The Commission should reject PG&E’s recommendation of a strict non-modification policy for AMP, especially when the proposed changes recommended by CalCCA can promote customer completion of AMP to allow a fresh start.

**III. THE COMMISSION SHOULD CONVENE A WORKSHOP AS RECOMMENDED BY PG&E, SCE, TURN, CALCCA AND CFORAT TO DISCUSS AMP, PAYMENT PLANS, INCREASING CUSTOMER OUTREACH, AND DISCONNECTION ISSUES**

CalCCA agrees with PG&E, SCE, TURN, and CforAT that the Commission should convene a workshop to allow stakeholders to discuss and investigate the various issues related to AMP, payment plans, increasing customer outreach, and general disconnection issues. The complexities of the COVID pandemic, CAPP payments, the disconnection moratoria, and the numerous available payment and assistance programs create a situation ripe for Commission guidance and oversight on how to successfully prevent future disconnections. In addition, investigating and promoting effective strategies for outreach on the various available programs, including providing effective timelines and program layering opportunities, is crucial to ensure assistance is appropriately tailored to customers. Finally, the Commission should investigate the discrepancies in enrollment in AMP between the IOUs, as pointed out in CforAT’s Opening

\(\text{Id.}\)

\(\text{Id. at 5.}\)
Comments. The Commission should convene a workshop to allow stakeholders to contribute to the coordination of the various programs to assist customers.

IV. THE COMMISSION SHOULD ADOPT TURN'S AND UCAN'S RECOMMENDATION THAT THE IOU MEDICAL BASELINE STUDY BE UPDATED ON A REGULAR BASIS

The Commission should adopt the recommendations of TURN and UCAN that the IOU Medical Baseline study, intended to measure and gain additional data on the Medical Baseline-eligible population in California, should be updated with regularity – preferably every five years. Without regular updates, the Medical Baseline study will only provide a one-time snapshot. Therefore, to maximize the investment in the study and ensure accurate counts of (and hopefully increase) the participation rate in the Medical Baseline program over time, the Commission should require an update to the study every five years.

V. CONCLUSION

For all the foregoing reasons, CalCCA respectfully requests consideration of the recommendations set forth herein and looks forward to an ongoing dialogue with the Commission and stakeholders.

Respectfully submitted,

Evelyn Kahl,
General Counsel and Director of Policy
CALIFORNIA COMMUNITY CHOICE ASSOCIATION

August 19, 2022

7 CforAT Opening Comments at 4 (noting that 21 percent of PG&E’s CARE and FERA customers had past due balance of 90 days or more, and among those customers, nearly 48 percent were enrolled in AMP; for SCE and SDG&E, 16 percent and 31 percent, respectively, of CARE and FERA customers had 90 day or more balances, but only 10 percent of SCE CARE and FERA customers and 11 percent of SDG&E customers with 90 day or more balances were enrolled in AMP).

8 TURN Opening Comments at 8; UCAN Opening Comments at 5.