



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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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
ADMINISTRATIVE LAW JUDGE'S RULING RELATING TO THE PHASE 2
WORKSHOP IN OCTOBER 2022**

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SUMMARY OF RECOMMENDATIONS

- In response to comments of Southern California Edison Company and Pacific Gas and Electric Company that unenrollment from payment plans is only communicated through the mailing of unenrollment letters, the California Public Utilities Commission should require investor-owned utilities (IOUs) to provide communications supplemental to their mailed letters (such as notices at a customer's physical address, and/or telephone or email contact) to ensure customers receive actual notice of the potential to fall out of payment plans;
 - Adopt the suggestion of San Diego Gas & Electric Company to enlist community choice aggregators in enrolling customers in the Community Based Organization Pilot (CBO Pilot) only if the IOUs are required to place alerts on accounts of customers eligible for or being served by the CBO Pilot; and
 - Continue with the CBO Pilot even after the funding of customer arrearages through the California Arrearage Payment Plan.
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California Community Choice Association¹ (CalCCA) submits these Reply Comments in response to the *Administrative Law Judge's Ruling Relating to the Phase 2 Workshop in October 2022* (Ruling), issued on November 10, 2022, requesting party comments on questions in sections 4 and 5 of the Ruling. CalCCA provides the following limited comments in reply to the Opening Comments of parties submitted on December 9, 2022.

I. SCE'S AND PG&E'S MAILED UNENROLLMENT LETTERS SHOULD BE SUPPLEMENTED WITH ADDITIONAL COMMUNICATIONS TO INFORM CUSTOMERS OF BREAKS TO PAYMENT PLANS

The investor-owned utilities (IOUs) should be required to supplement their communications of mailed letters regarding breaks from payment plans to prevent falling out of such payment plans and disconnections. Pacific Gas and Electric Company (PG&E) states a customer failing to complete the term of their arrearage management plan (AMP) or their COVID Long-Term Payment Plan is mailed an unenrollment letter providing the reason for unenrollment and information regarding other programs to help with the remaining balance.² In

¹ California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert Community Energy, East Bay Community Energy, Energy For Palmdale's Independent Choice, Lancaster Choice Energy, Marin Clean Energy, Orange County Power Authority, 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.

² PG&E Opening Comments at 2-3.

addition, if a customer contacts PG&E, at that point they will be informed of additional assistance programs.³ Similarly, Southern California Edison Company (SCE) mails letters to notify customers of unenrollment from payment plans.⁴ San Diego Gas & Electric Company (SDG&E) did not provide details on how it informs customers of unenrollment from payment plans.

Based on their experiences with customers, community choice aggregators (CCAs) have found inaccurate addresses listed with IOU customer accounts. The California Public Utilities Commission (Commission) should require that the IOUs provide communications supplemental to their mailed letters to ensure customers receive actual notice of the potential to fall out of payment plans. For example, the IOUs could provide notice at the physical address prior to unenrollment, and/or attempt to solicit communications with the customers by phone or email if possible. In other words, a mailed letter informing a customer of unenrollment in a payment plan may be insufficient, and the Commission should explore additional options to ensure customers are aware of their account status and additional benefits and programs for which they may be eligible. Ensuring such customer knowledge is especially important for vulnerable customers to ensure they receive the benefits of the payment plans, and to ultimately prevent disconnections.

II. SDG&E’S REQUEST FOR LOCAL CCAS TO ASSIST WITH MARKETING, EDUCATION, AND OUTREACH FOR CBO PILOT ENROLLMENT SHOULD BE ADOPTED AS LONG AS THE IOUS FLAG ELIGIBILITY WITHIN CUSTOMER ACCOUNTS

As set forth in CalCCA’s Opening Comments, the IOUs should place alerts on accounts of customers eligible for or being served by the Community Based Organization (CBO) Pilot.⁵ With those alerts, the CCAs will be able to accommodate SDG&E’s request that CCAs “play a role through their own contact centers in referring customers in need if such customers reach out directly to the CCAs regarding their bills and/or ability to pay.”⁶

III. CALCCA CONTINUES TO SUPPORT THE CBO PILOT EVEN AFTER CAPP FUNDING

In response to the December 1, 2022 email of Administrative Law Judge Stephanie Wang encouraging parties to address whether California Arrearage Payment Program (CAPP) funding

³ *Id.*

⁴ SCE Opening Comments at 2-3.

⁵ CalCCA Opening Comments at 7-8.

⁶ SDG&E Opening Comments at 11.

has changed party positions on moving forward with the CBO Pilot, CalCCA continues to support the CBO Pilot even after the CAPP funding. The CBO Pilot will provide unique insight into whether long-term support of customers struggling with continuing arrearages can help change energy bill payment behaviors. The information gleaned from the CBO Pilot will therefore provide valuable information to inform whether such long-term support should be expanded to more customers as a tool to prevent future disconnections.

IV. CONCLUSION

For all the foregoing reasons, CalCCA respectfully requests consideration of these Reply Comments and looks forward to an ongoing dialogue with the Commission and stakeholders.

Respectfully submitted,



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CALIFORNIA COMMUNITY CHOICE
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January 10, 2023