



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

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R1807005

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

R.18-07-005

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS
ON THE PROPOSED DECISION APPROVING COMMUNITY-BASED
ORGANIZATION ARREARS CASE MANAGEMENT PILOT PROGRAM**

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SUMMARY OF RECOMMENDATIONS

California Community Choice Association (CalCCA) provides the following recommended modifications to the Proposed Decision to ensure both bundled investor-owned utility (IOU) customers and community choice aggregator (CCA) unbundled customers benefit through participation and/or information collection from the Community-Based Organization (CBO) Arrears Case Management Pilot Program (CBO Pilot):

- Incorporate CCA customer considerations into the CBO Pilot implementation, including requiring the referral by the IOUs of eligible IOU *and* CCA customers to the CBOs, providing adequate information to the CBOs regarding CCAs, and requiring the CBOs to provide information on CCA customer participation in the pilot to the CCAs; and
- Require the evaluation metrics to identify IOU *and* CCA customers in the data to understand the impact of the CBO Pilot on bundled and unbundled customers.

In addition, CalCCA recommends adoption of the Proposed Decision's requirement to allow input by the Pilot Implementation Working Group in the selection of the evaluator and the evaluation scope.

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The California Community Choice Association (CalCCA)¹ submits these comments pursuant to Rule 14.3 of the California Public Utilities Commission (Commission) Rules of Practice and Procedure² on the proposed *Decision Approving Community-Based Organization Arrears Case Management Pilot Program*³ (Proposed Decision), dated January 9, 2024.

I. INTRODUCTION

CalCCA supports the Proposed Decision’s approval of the Community-Based Organization Arrears Case Management Pilot Program (CBO Pilot). Many California residential energy customers, including unbundled customers served by community choice aggregators

¹ California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert Community Energy, Energy For Palmdale’s Independent Choice, Lancaster 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 *State of California Public Utilities Commission, Rules of Practice and Procedure, California Code of Regulations Title 20, Division 1, Chapter 1* (May 2021): <https://webproda.cpuc.ca.gov/-/media/cpuc-website/divisions/administrative-law-judge-division/documents/rules-of-practice-and-procedure-may-2021.pdf>.

³ Proposed *Decision Approving Community-Based Organization Arrears Case Management Pilot Program*, Rulemaking (R.) 18-07-005 (Jan. 9, 2024): <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M523/K071/523071353.PDF>.

(CCAs), continue struggling to remain current on their bills and avoid service disconnections. The two-year CBO Pilot is designed to fund case management services through community-based organizations (CBOs) for 12,000 customers to reduce residential disconnections by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E), (collectively, the IOUs). Through accurate documentation and evaluation, the CBO Pilot can provide valuable data to assess whether such case management services should be implemented on a larger scale.

All residential customers, including IOU bundled and CCA unbundled customers, will fund the \$11.24 million CBO Pilot.⁴ As CCA customers are distribution customers of the IOUs, certain CCA customers will be eligible to participate in the CBO Pilot. As required by Decision (D.) 22-04-037, one CCA from each IOU service territory participated in a CBO Pilot Working Group which refined the eligibility parameters for customers to participate in the CBO Pilot.⁵ The zip codes ultimately chosen to be served under the CBO Pilot do not include any zip codes within CCA territories in PG&E's service territory (and therefore no customers from CCAs in PG&E's service territory will participate in the CBO Pilot).⁶ However, CCA customers in certain zip codes in SCE's and SDG&E's service territories will be eligible to participate.⁷

⁴ Proposed Decision, at 13, 28, Conclusion of Law 17 (COL), at 33 (“It is reasonable for the case management services to be funded by ratepayers because the CBOs will help enroll eligible customers in arrearages management programs, to help customers remain in the program, reduce their energy bills and arrearages over time, and reduce the risk of service disconnection”).

⁵ D.22-04-037, *Decision Requiring Development of Community Based Organization Case Management Pilot Program to Reduce Arrearages Associated with the Covid-19 Pandemic*, R.21-02-014 (Apr. 7, 2022): <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M468/K801/468801115.PDF>.

⁶ Proposed Decision at 11-12, Finding of Fact (FOF) 4, at 31.

⁷ *Id.* at 11, FOF 3, at 31.

Aside from the potential benefits of participation, *all* CCAs are interested in ensuring robust and comprehensive data collection regarding all aspects of the CBO Pilot, including CCA customer participation. Such data will enable the assessment of the value of rolling out such CBO case management on a widespread basis at the end of the CBO Pilot. CalCCA accordingly provides the following recommended modifications to the Proposed Decision to ensure both bundled and unbundled customers benefit through participation and/or information collection:

- Incorporate CCA customer considerations into the CBO Pilot implementation, including requiring the referral by the IOUs of eligible IOU and CCA customers to the CBOs, providing adequate information to the CBOs regarding CCAs, and requiring the CBOs to provide information on CCA customer participation in the pilot to the CCAs; and
- Require the evaluation metrics to identify IOU and CCA customers in the data to understand the impact of the CBO Pilot on bundled and unbundled customers.

In addition, CalCCA recommends adoption of the Proposed Decision's requirement to allow input by the Pilot Implementation Working Group in the selection of the evaluator and the evaluation scope.

II. THE COMMISSION SHOULD ADOPT THE PROPOSED DECISION WITH MODIFICATIONS TO ENSURE BOTH BUNDLED AND UNBUNDLED RESIDENTIAL CUSTOMERS BENEFIT FROM THE CBO PILOT

A. CCA Customer Considerations Should be Incorporated into the CBO Pilot Implementation

The CBO Pilot Design should be updated to ensure CCA customer considerations are incorporated into the Pilot. CalCCA appreciates the Proposed Decision's requirement that CCAs be invited to participate in the Pilot Implementation Working Group to assist with the creation of standard informational and training materials.⁸ However, the Commission should also require incorporation of the needs of unbundled versus bundled customers both for participation in the

⁸ *Id.*, at 16, COL 9, at 32.

Pilot as well as reaping the benefits of the evaluation. As such, the following should be incorporated into the CBO Pilot Design, Marketing, Education and Outreach (ME&O), and enrollment specifications:

- IOUs should be required to refer eligible IOU *and* CCA customers, and therefore “provide selected CBOs with customer contact information for [both IOU *and* CCA] eligible customers”;⁹
- CBOs should be provided standard information regarding CCAs to enable the CBOs to adequately advise CCA customers regarding their options for assistance from the CCA and/or the IOU;
- SCE and SDG&E should not only be required to provide CCAs the customer accounts participating in the pilot, but also customers who have unenrolled;¹⁰ and
- Attachment A of the Proposed Decision should be amended to incorporate requirements concerning CCA customers, including SCE and SDG&E providing marketing materials and customer enrollment data to CCAs.¹¹

In addition to the above, the CCAs look forward to participating in the Pilot Implementation Working Group to ensure (1) CCA information is represented in ME&O materials, (2) that all CBOs participating are equipped with information to adequately support both bundled and unbundled customers, and (3) that the information is standardized to allow adequate evaluation of both bundled and unbundled customer success under the program.

B. Pilot Metrics and Evaluation Should Incorporate Data Regarding CCA Customer Pilot Participation

In addition to enabling effective CCA customer participation in the Pilot, CalCCA recommends that the evaluation metrics be modified to ensure data distinguishes between IOU

⁹ *Id.*, at 10 (listing the pilot design elements).

¹⁰ In addition, the Commission should amend Attachment A to incorporate its requirements for SCE and SDG&E.

¹¹ *See* Proposed Decision, at 12, and COL 3, at 32 (“It is reasonable to require SCE and SDG&E to provide the following information to each CCA that serves pilot zip codes: (a) pilot marketing materials and contact information for the CBOs that serve pilot zip codes in the CCA’s service territory at least 10 business days before pilot enrollment commences, and (b) a list of the customer accounts that are participating in the pilot within 10 business days of the end of the pilot enrollment period.”).

and CCA customers (as well as the specific organization serving each customer). As experienced with the Arrearage Management Plan success rates and evaluation process, certain “best practices” of organizations work better than others.¹² Keeping careful track of the success rates of customers not only according to the metrics set forth in the Proposed Decision but also by organization (IOU or CCA) will ensure the robust evaluation necessary to determine what was effective. Therefore, CalCCA requests that the Commission incorporate into the metrics a categorization regarding not only for pilot and non-pilot customers, but also whether such customers are IOU or CCA customers.

C. The Commission Should Adopt the Proposed Decision’s Requirement that the Pilot Implementation Working Group Provide Guidance on the Evaluation Contractor and Key Deliverables

The Commission should adopt the Proposed Decision’s requirement that:

[t]he Pilot Implementation Working Group, excluding the CBO Pilot Program contracts, meet with Energy Division to discuss the selection of the evaluation contractor, the evaluation scope of work, the evaluation plan, the reporting metrics, and the evaluation report.¹³

Allowing members of the Pilot Implementation Working Group to guide the selection of the evaluation contractor and provide input on the evaluation scope will ensure the broad input of interested load-serving entities and stakeholders. The Proposed Decision’s requirement to include the Pilot Implementation Working Group in the evaluation process should be adopted.

¹² See, e.g., R.18-07-005, *Administrative Law Judge’s Ruling Directing Utilities to Provide Data and Requesting Comments on Pilot Questions* (Feb. 13, 2023) (detailing the difficulties of evaluating success under the AMP Program when the IOUs utilized different parameters to measure success under the program): <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M502/K200/502200451.PDF>.

¹³ Proposed Decision, at 25, COL 16, at 33.

III. CONCLUSION

CalCCA appreciates the opportunity to submit these comments and requests adoption of the recommendations proposed herein. For all the foregoing reasons, the Commission should modify the proposed decision as provided in Appendix A.

Respectfully submitted,

A handwritten signature in blue ink that reads "Evelyn Kahl". The signature is written in a cursive, flowing style.

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

January 29, 2024

APPENDIX A
TO
CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS ON THE
PROPOSED DECISION APPROVING COMMUNITY-BASED ORGANIZATION
ARREARS CASE MANAGEMENT PILOT PROGRAM

PROPOSED CHANGES TO FINDINGS OF FACT,
CONCLUSIONS OF LAW AND ORDERING PARAGRAPHS

Proposed text deletions show as ~~bold and strikethrough~~
Proposed text additions show as **bold and underlined**

FINDINGS OF FACT

No proposed changes.

CONCLUSIONS OF LAW

3. It is reasonable to require SCE and SDG&E to provide the following information to each CCA that serves pilot zip codes: (a) pilot marketing materials and contact information for the CBOs that serve pilot zip codes in the CCA's service territory at least 10 business days before pilot enrollment commences, and (b) a list of the customer accounts that are participating in the pilot within 10 business days of the end of the pilot enrollment period, **and a list of the customer accounts that unenroll from the pilot.**

6. It is reasonable for a Pilot Implementation Working Group to meet to discuss the development of standard informational materials about the pilot and standard training materials for providing case management services, **including information on CCAs and regarding IOU and CCA assistance programs,** before the CBO Pilot Program commences.

11. It is reasonable to adopt the CBO Pilot Program metrics and reporting requirements in Attachment A, **which will require the Large Utilities to refer eligible IOU and CCA customers to CBOs for services under the CBO Pilot Program.**

13. It is reasonable to adopt the CBO Pilot Program evaluation plan in Attachment A, **which will require information on CBO participation to be categorized according to whether a participant is a customer of an IOU or CCA.**

ORDERING PARAGRAPHS

No proposed changes.

New Order:

No proposed changes.