

DRAFT



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**ADVICE XXX-G/4XXX-E
(U 338-E)**

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Southern California Edison Company's Transition Plan for the
Expiration of Emergency Customer Protections

PURPOSE

SCE hereby submits this Tier 2 Advice Letter (AL) pursuant to Ordering Paragraph (OP) 5 of Resolution M-4849 (Resolution). The purpose of this AL is to provide the transition plan for the expiration of Emergency Customer Protections. The transition plan is aimed to ease customers through a transition off of the Emergency Customer Protections by proactively communicating with customers to enroll them in programs to manage their utility bills and informing them of the changes to programs in which they are already enrolled.

BACKGROUND

On March 4, 2020, Governor Newsom declared a State of Emergency related to the COVID-19 pandemic¹ and followed up on March 19, 2020 with an executive order for Californians to shelter in place except to meet essential needs.² In response, on April 16, 2020, the California Public Utilities Commission (Commission or CPUC) ratified Resolution M-4842, Emergency Authorization and Order Directing Utilities to Implement Emergency Customer Protections to Support California Customers During the COVID-19 Pandemic. Specifically, Resolution M-4842 ordered the utilities to file Tier 2 advice letters describing all reasonable and necessary actions to implement the Emergency Customer Protections and set an end date for the Emergency Customer Protections as April 16, 2021.

¹ <https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-help-state-prepare-for-broader-spread-of-covid-19/>.

² Executive Order N-33-20, available at <https://www.gov.ca.gov/2020/03/19/governor-gavin-newsom-issues-stay-at-home-order/>.

On May 1 and May 27, 2020, SCE submitted Advice 233-G/4205-E and 233-G-A/4205-E-A, respectively, to describe all reasonable and necessary actions to implement the Emergency Customer Protections for Residential and Small Commercial Customers during the COVID-19 pandemic. In addition, SCE requested establishment of the COVID-19 Pandemic Protections Memorandum Account (CPPMA) to track incremental costs associated with complying with Resolution M-4842. On February 11, 2021, the CPUC approved Resolution M-4849, which extended the Emergency Customer Protections to June 30, 2021 and ordered the creation of transition plans to facilitate a smooth transition for customers when the Emergency Customer Protections are lifted.³

In this advice letter, SCE complies with the Commission's directives in OP 5 of the Resolution by including: (1) a timeline of new start and resumed activities, (2) a marketing, education, and outreach (ME&O) strategy, (3) an explanation of the activities timeline and ME&O strategy for compliance and safety, and (4) a progress tracking and reporting plan. The goal of this transition plan is to proactively engage customers on programs to manage their utility bills and inform relevant customers of the changes to programs they are already on.

DISCUSSION

I. Introduction

A. Current State of SCE's Emergency Customer Protections

SCE instituted several customer protections for its Residential and Small Commercial Customers in response to the COVID-19 pandemic. SCE suspended disconnections for nonpayment, waived all Late Payment Charges (LPC), and eliminated deposit requirements for both establishment and re-establishment of service. In addition, these customers are eligible for payment arrangements of 12 months, with the possibility for longer arrangements.

For residential customers, SCE suspended the standard and high-usage post-enrollment verifications for all customers in the California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA) programs. Similarly, SCE temporarily waived the requirement for a qualified medical professional certification signature⁴ for the Medical Baseline Allowance Application at the time of enrollment and deferred Medical Baseline renewals so that customers will not be removed from the program while the Emergency Customer Protections are in effect.

SCE also partnered with SCE's Energy Assistance Fund (EAF) administrator to provide up to an additional \$100 in one-time bill payment assistance to affected income-eligible

³ Resolution M-4849, OP 5.

⁴ Consistent with Senate Bill (SB) 598 and SB 1338, SCE accepts certification signatures from Medical Doctors (MD), Doctors of Osteopathy (DO), Physician Assistants (PA), or Nurse Practitioners (NP).

customers in SCE's service territory.⁵ In addition, SCE continued to deploy contractors for its Energy Savings Assistance (ESA) program while following state and local government safety guidelines. For residential customers, reconnection fees have been permanently eliminated.⁶

For SCE's small and medium business customers who have elected to curtail routine business activities and/or closed business operations during the COVID-19 pandemic, SCE waived the standard \$30 service connection charge when the customer elects to re-start their service.⁷

To notify customers of these Emergency Customer Protections, SCE performed outreach via SCE.com, outbound e-mails, direct mail, digital and radio advertisement, fact sheets distributed by Community Based Organizations (CBO) and food banks, and customer bill inserts. SCE provided the Emergency Customer Protections information in accordance with the language requirements outlined in Decision (D.) 20-03-004: English, Spanish, Chinese (including Cantonese, Mandarin, and other Chinese languages), Tagalog, Vietnamese, and Korean, as well as languages prevalent within SCE's service territory. This includes languages spoken by indigenous communities that occupy significant roles in California's agricultural economy, regardless of prevalence. Besides English, the fact sheet is available in 14 additional languages.⁸

B. Transition Objectives

Pursuant to the Resolution, the Emergency Customer Protections are expected to conclude on June 30, 2021. Due to ongoing system upgrades necessary for SCE to begin its collection activities, however, SCE currently estimates it will not begin collection activities until August 1, 2021. Prior to the start of collection activities, SCE intends to emphasize customer outreach for those customers who are most likely to be impacted by collection activities, namely, customers who have outstanding arrearage balances. The outreach to customers would begin at least 60 days (estimated to be no later than June 2, 2021) prior to the start of collection activities.

While all customers would receive notification on the start of collection activities via the "Things you should know" section of the customer bill, SCE intends to develop additional customized communications targeting specific customers with outstanding arrearages. SCE proposes to develop customized communications for: (1) CARE/FERA and Medical Baseline customers, (2) non-CARE/FERA/Medical Baseline residential customers, and (3) Small Commercial Customers. As the options available to these segmented customer groups post-Emergency Customer Protections will differ

⁵ The list of EAF agencies is available at <https://www.sce.com/residential/assistance/energy-assistance-fund>.

⁶ D.20-06-003, OP 16.

⁷ The Non-Residential Service Connection Charge will not apply to accounts with monthly Maximum Demands below 200 kW.

⁸ <https://www.sce.com/safety/coronavirus>.

slightly, the customized communications would allow for customers to quickly obtain the relevant information for their specific situation.

II. Marketing, Education, and Outreach (ME&O) Strategy

A. Objective of the ME&O Communication Plan

The objective of the customer communication plan is to continue to raise awareness and inform customers about the existence of the available consumer protections while also informing them of their limited duration and anticipated expiration on June 30, 2021. SCE proposes to begin its outreach to customers at least 60 days before the June 30 expiration date.

B. ME&O Strategy

SCE's strategy will include a combination of tactics designed to reach all customers while directly communicating to those who have taken advantage benefited from of protections and who may be (1) in arrears, (2) AMP eligible or income-qualified, (3) residential, and (4) small businesses. These direct to customer communications will raise awareness about the consumer protections ending on June 30, 2021 while also informing them of other offers that may be utilized. Tactics will include but may not be limited to on-bill messaging, direct mail when appropriate, email, CBO engagement, targeted social media and web pages across SCE's website.

SCE's awareness campaign will reach customers across SCE's territory prior to the protections ending. Within the message strategy it will be made clear SCE understands that just because the protection policies are ending, customers' hardship may not be. Messaging will prioritize that SCE recognizes people still need help, and that SCE is offering a variety of assistance options they customers can switch to.

C. Implementation and Community Outreach

SCE will take steps to raise awareness and engage affected customers on the crucial consumer protections that are available. To accomplish this, SCE will use various forums, tactics, and channels to reach customers to inform them about these necessary protections and their duration, which may include, but are not limited to, those outlined below.

1. Webpages

SCE will add the expiration date of June 30, 2021 and will continue to add information on consumer protections on SCE.com webpages including COVID-19 response, bill assistance, and disaster support at the following addresses:

SCE.com/Safety/Coronavirus, SCE.com/BillHelp, and SCE.com/DisasterSupport. SCE will engage its agency partners to develop copy for the content updates. The cost for similar COVID-19 related copywriting done in March 2020 was \$4,977.

2. Outbound Emails

SCE will review all active (*i.e.*, “in-market”) and planned (*i.e.*, “not-yet-launched”) email campaigns to determine the potential for consumer protections message integration. For customers who have opted in to receive promotional marketing communications electronically, SCE will engage its agency partners to also provide estimated cost for including dynamic message on any emails designated for deployment to those opted-in customers. SCE may also elect to send a transactional email which does not require opt-in. SCE would utilize in-house resources to deploy the transactional email.

3. Bill Onsert and Bill Messaging

Space permitting, SCE has included and will continue to include COVID-19 consumer protections messaging and the link to the [SCE.com/Safety/Coronavirus](https://www.sce.com/Safety/Coronavirus) webpage on all residential customer bills using “on-bill” (onsert) messaging. In 2020, SCE added bill onserts to all customer bills in May, July, and October to notify customers that SCE had suspended service disconnections for non-payment, waived late fees, and would only continue critical work needed to protect public safety and reduce the risk of wildfire. For customers that were financially impacted by COVID-19, SCE also included its [SCE.com/billhelp](https://www.sce.com/billhelp) site to provide more ways for the customers to get financial assistance. As an added location to provide information, SCE also updated the “Things you should know” section on residential customer bills to communicate the disconnection moratorium, waiving of late fees, and the number to SCE’s Customer Contact Center to seek financial assistance. In this notification, SCE also conveyed that financial programs such as CARE, FERA, and the Energy Savings Assistance (ESA) program are available for income-qualified customers.

SCE anticipates this proactive, consumer protection timing limitation awareness messaging will be implemented prior to the June 30 expiration date, consistent with SCE’s current communication cadence for bill onsert messaging. SCE will utilize internal marketing resources to develop high-level messaging that will be utilized for the bill onsert to all SCE customers. As such, no incremental costs are anticipated to be incurred for bill onsert messaging.

4. Direct Mail

Similar to the outbound emails, SCE will review all active (*i.e.*, “in-market”) and planned (*i.e.*, “not-yet-launched”) direct-to-customer campaigns to determine the extent to which supporting marketing communications can be augmented to include messaging that directs customers to [SCE.com](https://www.sce.com) to receive information about the consumer protections afforded to them. Message augmentation may potentially include creation of a free-standing insert that would accompany a marketing campaign’s pre-printed customer letter or materials. The estimated cost per mail piece is \$0.67. Actual cost will vary based on the final quantity of inserts printed.

Alternatively, if print production has not yet occurred for a campaign's customer letter or other materials, SCE can also ask its agency partners to evaluate the feasibility of and incremental cost for including messaging on those letters or materials.

The cost to implement messaging cannot be projected at this time in absence of obtaining an actual quote from the marketing agency that considers among other things scope, lead time for programming the message, ease of implementation, and the quantity and format of the communications that will display the message. SCE will ensure that any free-standing inserts created, or dynamic messaging implemented in support of notifying customers about consumer protections are provided in the same languages as the primary direct mail or email communications they should accompany.

5. Community Based Organizations (CBO) Engagement

SCE has established relationships with nearly 1,600 non-profit community and faith-based organization (FBO) across its vast service territory to help increase awareness and educate customers on rates and other income assistance programs such as CARE/FERA and Medical Baseline. SCE actively communicates with these CBOs and are engaged both quarterly as well as on an as needed basis. SCE is working and will continue to work with organizations to disseminate information on consumer protections within the limited time frame in front of it. CBOs and FBOs also regularly exchange and share communications on programs and service through social media, e-newsletters, and direct stakeholder engagement efforts like digital webinars.

In addition, to create productive alliances with key CBOs, particularly those that reach critical customer segments like Seniors, Low-Income, Disabled, and Multi-Cultural, SCE launched a pay-for-performance model in 2019 and contracted 30 CBOs for ongoing incentivized partnerships. Those CBOs were selected through a Request for Proposal (RFP) that was designed to selected CBOs that have a strong reach within diverse communities and a demonstrated strong ability to partner with SCE to help educate customers in valuable programs and services.

6. Customer Call Center Communications

Pursuant to D.20-06-003, SCE has trained its Customer Call Center (CCC) to offer to enroll eligible customers in all applicable benefit programs administered by the utility when receiving customer calls.⁹ In addition for calls regarding arrears or disconnections, the CCC is trained to inquire if the customer is interested in hearing about applicable benefit programs. Residential customers are given two billing cycles after being made aware to enroll in the applicable benefit programs. After the Emergency Customer Protections period, the CCC will continue to provide SCE's customers with this information and assist customers with enrolling in benefit programs that the customer is eligible for. In addition, should there be a need for outbound calls or text messages to specific customers, SCE's CCC could reach out directly to the

⁹ D.20-06-003, OP 1(c).

identified customers.

D. Multi-Language Support

SCE currently provides the consumer protections information in accordance with the language requirements outlined in D.20-03-004: English, Spanish, Chinese (including Cantonese, Mandarin, and other Chinese languages), Tagalog, Vietnamese and Korean, as well as languages “prevalent” within SCE’s service territory including languages spoken by indigenous communities that occupy significant roles in California’s agricultural economy regardless of prevalence. SCE voluntarily also provided its Customer Protections Fact Sheet in 9 additional languages¹⁰ on its website.¹¹ SCE will update the fact sheets for all 15 languages to reflect the June 30, 2021 end date for Emergency Customer Protections.

SCE will continue to maintain current production workflows for the six core languages (English, Spanish, Chinese, Tagalog, Vietnamese and Korean) which are effective in reaching approximately 95% of SCE customer base.

III. Resumed Activities Timeline

A. Timing for Start of Collection-Related Activities

While the Emergency Customer Protections period is currently estimated to end on June 30, 2021,¹² SCE is not planning to resume certain collection activities until Monday, August 2, 2021. Currently, SCE is in transition for its Customer Service Re-Platform (CSRP) implementation, which is expected to “go live” in early April 2021. The transition will be followed by a stabilization period, which will be focused on defect correction and other stabilization needs. The objective of the stabilization is to reduce risk of potential customer impacts and billing system issues. Once SCE can confirm the new system is stable, SCE will begin making additional system adjustments such as necessary logic to include the additional customer protections included in D.20-06-003. SCE estimates this would be completed by August 2, 2021 but may be delayed due to unforeseen circumstances such as delays to the additional system adjustments.

The activities that are expected to begin on July 1, 2021 include limiting Small Commercial Customer payment arrangements to six-months, collection of the service connection charge, and the commencement of verifications and re-certifications for CARE, FERA, and Medical Baseline Customers. In addition, SCE would also discontinue the temporary increased funding levels in the EAF.

¹⁰ The additional languages supported are Arabic, Armenian, Farsi, French, German, Japanese, Khmer, Punjabi, and Russian.

¹¹ <https://www.sce.com/safety/coronavirus>

¹² Resolution M-4849, OP 1.

As discussed in the previous section, SCE will begin its marketing and outreach communications to customers at least 60 days before June 30, 2021.

B. Resuming Overdue Notices, Final Call Notices, and Disconnections for Residential Customers

As discussed above, SCE currently expects to formally lift its collections freeze and initiate collection activities for Residential Customer beginning August 2, 2021. Table 1 outlines the earliest date for each of the new activities. As illustrated in Table 1, the earliest possible date a customer could be disconnected for nonpayment would be September 7. This effectively translates into an additional 69 days (June 30 to September 7) that SCE Residential Customers are under a disconnection moratorium. Additionally, D.20-06-003 provides additional protections that may further delay disconnections for nonpayment for some customers. For example, should the customer contact SCE regarding bill payment activity prior to being disconnected for nonpayment, the customer would be offered two billing cycles to enroll in all applicable benefit programs as well as a 12-month payment plan.¹³ If a customer enters a 12-month payment plan and is current on both monthly bills and the 12-month payment plan, the customer would not be disconnected.¹⁴ In addition, income-qualified customers with \$500 or more in arrears could also be eligible for the Arrearage Management Plan (AMP).

Table 1: Estimated *Earliest Possible* Date for Collection Activities (Residential)

Activity	Earliest Possible Date
Start of collection activities	August 2, 2021
Earliest date overdue notices are mailed	August 3, 2021
Earliest date final call notices are mailed	August 24, 2021
Earliest a customer can be disconnected for non-payment	September 7, 2021

As previously outlined in SCE's reply comments to Resolution M-4849,¹⁵ it is operationally infeasible for SCE to conduct a massive disconnection event that is equal to its annual residential disconnection in a short time. Prior to the implementation of Emergency Customer Protections, SCE did not disconnect all customers that were eligible for disconnection on any given day. The actual number of customers that could

¹³ D.20-06-003, OPs 1(c) and 1(d).

¹⁴ *Id.*, OP 1(d).

¹⁵ SCE Reply Comments to Draft Resolution M-4849, p. 4.

be disconnected was based on operational limitations such as the expected number of calls received by SCE’s Customer Contact Center (CCC).

To confirm that SCE’s new Customer Service system is operating correctly for collection activities, SCE intends to further limit the number of customers that are ultimately eligible for disconnection by restricting the number of overdue and final call notices during the first three months when collections activities resume (August through October). The limited number of customers impacted simplifies the identification and correction of any potential issues that may arise. Historically, approximately 50 percent of customers who receive overdue notices do not take corrective action and receive a final call notice. Of those that receive a final call notice, approximately eight percent still take no corrective action and are disconnected. For Residential Customers, final call notices are sent 18 calendar days after the overdue notices and disconnection can occur 12 days after the final call notice.¹⁶

After November 2, 2021, SCE would no longer limit the number of overdue notices being sent daily to Residential Customers and would manage disconnections based on the disconnection cap and the volume of daily calls that can be handed by SCE’s CCC. Table 2 reflects the planned reinstatement of the overdue and final notices.

Table 2: Proposed Reinstatement for Overdue and Final Call Notices for Residential Customers

Date	Daily Number of Overdue Notices (OD)	Expected Number of Final Call (FC) Notices (18 calendar days after OD)	Expected Number of Disconnections (12 calendar days after FC)
August 3, 2021	500	250	20
September 21, 2021	1,000	500	40
October 5, 2021	5,000	2,500	200
October 19, 2021	10,000	5,000	400
November 2, 2021	No longer limited	No longer limited	Continues to be limited by operational constraints
<i>Formula</i>	<i>A</i>	<i>B=A*0.50</i>	<i>C=B*0.08</i>

¹⁶ SCE does not mail overdue or final call notices on Sundays or Mondays. Any notices that normally would be sent on those days are diverted to the following Tuesday.

C. Residential Customer Payment Arrangements

There is no change to the length of available payment arrangements for Residential Customers because all residential customers would be offered payment arrangements of 12-months prior to disconnection.¹⁷ The customer would be permitted to select a shorter payment plan. However, if the customer breaks this payment arrangement, SCE may require a down payment to enter into subsequent payment arrangements. This policy precludes the “chaining” of payment plans each month into an ever-growing arrears balance.

D. Resuming Overdue Notices, Final Call Notices, and Disconnections for Small Commercial Customers

As discussed above, SCE currently expects to formally lift its collections freeze and initiate collection activities for Small Commercial Customers beginning August 2, 2021. Table 3 outlines the earliest date for each of the new activities. As illustrated in Table 3, the earliest possible date a Small Commercial Customer could be disconnected for nonpayment would be August 20. This effectively translates into an additional 51 days (June 30 to August 20) that SCE Small Commercial Customers are under a disconnection moratorium. Small Commercial Customers differ from Residential Customers in that there is a shorter period of time before a final call notice is sent which leads to August 20 as being the earliest date that a Small Commercial Customer could be disconnected for non-payment.

Table 3: Estimated *Earliest Possible Date* for Collection Activities (Small Commercial Customer)

Activity	Earliest Possible Date
Start of collection activities	August 2, 2021
Earliest date overdue notices are mailed	August 3, 2021
Earliest date final call notices are mailed	August 10, 2021
Earliest a customer can be disconnected for non-payment	August 20, 2021

In a similar fashion to the ramp up for Residential Customers, SCE intends to limit the number of overdue notices sent to customers and thereby the number of final call notices and disconnections. Historically, approximately 21 percent of customers who receive overdue notices do not take corrective action and receive a final call notice. Of

¹⁷ D.20-06-003, OP 1(d).

those that receive a final call notice, approximately 13 percent still take no corrective action and are disconnected. For Small Commercial Customers, final call notices are sent five calendar days after the overdue notices and disconnection can occur 10 days after the final call notice.¹⁸

After October 5, 2021, SCE would no longer limit the number of overdue notices being sent daily for Small Commercial Customers and would manage disconnections based on the disconnection cap and the volume of daily calls that can be handed by SCE's CCC. Table 4 reflects the planned reinstatement of the overdue and final notices.

Table 4: Proposed Reinstatement for Overdue and Final Call Notices for Small Commercial Customers

Date	Daily Number of Overdue Notices (OD)	Expected Number of Final Call (FC) Notices (5 calendar days after OD)	Expected Number of Disconnections (10 calendar days after FC)
August 3, 2021	500	105	14
September 21, 201	1,000	210	27
October 5, 2021	No longer limited	No longer limited	Continues to be limited by operational constraints
<i>Formula</i>	<i>A</i>	<i>B=A*0.21</i>	<i>C=B*0.13</i>

E. Start of Deposit Requirements for Small Commercial Customers

On July 1, 2021, SCE proposes to reinstate its deposit requirements for eligible Small Commercial Customers during the move-in process. For re-establishment of service deposits, SCE has identified that a system update is necessary before commencement of collection these deposits. SCE proposes to not begin collection of Small Commercial Customer re-establishment deposits until the system can be updated. The collection of re-establishment deposits would begin no earlier than August 1, 2021. There is no impact for Residential customers as all residential deposits are prohibited pursuant to D.20-06-003.¹⁹

¹⁸ SCE does not mail notices on Sundays or Mondays. Any notices that normally would be sent on those days are instead diverted to the following Tuesday.

¹⁹ D.20-06-003, OP 8 and 9.

F. Updates to Payment Arrangements for Small Commercial Customers

SCE proposes to allow Small Commercial Customer payment arrangements of up to 6-months once Emergency Customer Protections end. This aligns with SCE's recommendation to provide Medium and Large Commercial and Industrial customers with the same length of payment arrangements.²⁰ Small Commercial Customers are not required to make a down payment to enroll in a payment plan. However, if the customer breaks the payment arrangement, SCE may require a down payment to enter into a new payment arrangement. This policy precludes the "chaining" of payment plans each month into an ever-growing arrears balance.

G. Resuming Service Connection Charge for Small Commercial Customers

In Advice 233-G/4205-E, SCE voluntarily waived the standard \$30 service connection charge when a Small Commercial Customer elected to curtail routine business activities and/or closed business operations during the COVID-19 pandemic.²¹ Starting on July 1, 2021, SCE would resume collection of the \$30 service connection charge. There is no impact to residential customers as residential reconnection fees have been eliminated pursuant to D.20-06-003.²²

H. Resuming Eligibility Verifications for CARE, FERA, and MBL Customers

Starting July 1, 2021, SCE will resume verification and re-certification activity for the CARE, FERA, and MBL programs. For any customer that enrolled or reached their re-certification anniversary during the Emergency Customer Protections period (*i.e.*, March 4, 2020 to June 30, 2021), SCE automatically re-certified the customer for the standard period of 2 years or 4 years depending on the program.²³ SCE will not require these customers to re-certify again until their standard re-certification date. Table 5 provides illustrative examples of future re-certification dates depending on when the customer initially enrolled in the program and whether the customer was automatically re-certified during the Emergency Customer Protection period. Any customer who is requested to re-certify is given 90 days to provide the requested documentation. Should a customer decline to re-certify or should a customer provide insufficient documentation, the customer would be subject to removal from CARE, FERA, or MBL.

²⁰ SCE Opening Comments on Administrative Law Judge's Ruling Seeking Comment on Policy Questions for Medium-Large and Industrial Utility Customer Disconnection Moratorium Approach (January 22, 2021), p. 8.

²¹ SCE Advice 233-G/4205-E, p. 10.

²² D.20-06-003, OP 16.

²³ CARE, FERA, and MBL customers are normally required to re-certify every two years. Select CARE customers (those on fixed income) are only required to re-certify every four years.

Table 5: Illustrative Example of Dates for Customer Re-Certification

Enrollment Date	Automatic Re-certification During Emergency Customer Protections?	Next Re-Certification Date ¹
August 1, 2018	Yes	August 1, 2022
August 1, 2019	No	August 1, 2021
August 1, 2020	No, was a new enrollment	August 1, 2022

¹ For ease, example assumes standard two-year re-certification.

In addition, prior to the start of verification activity for MBL, SCE will complete its implementation for a procedure to allow qualified medical professionals to e-sign applications for the program pursuant to D.20-06-003.²⁴ For CARE customers, SCE will also re-establish the High Usage Verification for customers who exceed the approved threshold.

I. Update to SCE Energy Assistance Fund Direct Payment Assistance

The EAF is SCE’s charitable, non-profit organization that offers direct payment assistance to those in need, including seniors on fixed income, young families with children, and veterans. EAF is comprised of shareholder, employee, and customer donations. In response to the COVID-19 pandemic, SCE temporarily increased the maximum EAF amount to \$200 (up from \$100) and \$300 for all electric households (up from \$200).²⁵ In 2020, over \$1.5 million in bill assistance was distributed to the more than 10,000 households that participated in the EAF program. Beginning on July 1, 2021, the additional \$100 for bill payment assistance will no longer be made available to customers.

J. Energy Savings Assistance (ESA)

SCE’s ESA is designed to help income-qualified customers conserve energy and save money. Income-qualified customers may be eligible to receive energy-efficient appliances at no charge or a minimal charge. As of June 1, 2020, SCE lifted its work restrictions for ESA program contractors. Contractors have been advised to proceed safely and cautiously and recommended to adhere to SCE’s safety protocols alongside state and local government guidelines, based on whichever guidance is more restrictive. As this activity is already ongoing, there is no change resulting from the end of Emergency Customer Protections. To help reduce potential exposures, SCE will

²⁴ D.20-06-003, OP 36.

²⁵ SCE Advice 233-G/4205-E, p. 6.

continue to offer virtual program enrollment and assessment to customers where feasible.

IV. Compliance and Safety Focus

SCE will continue to monitor state and local COVID-19 health orders and governmental directives, and reserves the right, in consultation with Energy Division, to postpone implementation of provisions of this Plan as necessary to ensure the safety of SCE' employees, customers and the general public.

A. Vulnerable Customer Safety

Prior to the disconnection of any customer account that is classified as medical baseline, disabled, senior citizen, or critical care, SCE performs in-person visits at time of disconnection. For customers who are classified as both medical baseline and critical care, SCE does not disconnect on first contact with the customer. If contact is made, the Field Service Representative (FSR) will refer the customer to the Customer Contact Center to make arrangements for payment. If no customer contact is made on the first visit, FSRs will extend the account for an additional 48-hours and leave a notification at the customer's home.

On the second attempt, if a customer is home, the FSR will offer to help the customer arrange for payment. If no customer contact is made on the second attempt, a service disconnection can only occur if (1) the FSR deems it safe to do so (e.g., safe access, no issues with customer panel/meter), (2) there is no safety risk to the customer or public, and (3) supervisor approval has been granted.

B. Compliance with Additional Residential Customer Safeguards for Disconnections

SCE will fully comply with the additional residential safeguards against disconnections from D.20-06-003. Specifically, residential customers shall not be disconnected for non-payment:

- Until SCE offers to enroll eligible customers in all applicable benefit programs administered by SCE;²⁶
- Until SCE offers a 12-month payment plan, or if the customer is on a 12-month payment plan and is current on both monthly bills and the 12-month payment plan;²⁷
- If the customer currently has a Low-Income Home Energy Assistance Program (LIHEAP) pledge pending;²⁸

²⁶ D.20-06-003, OP 1(c).

²⁷ *Id.*, OP 1(d).

²⁸ *Id.*, OP 1(e).

- When temperatures above 100 degrees or below 32 degrees are forecasted based on a 72-hour look-ahead period.²⁹

While the Investor-Owned Utilities (IOUs) are not required to make an affirmative inquiry of every residential household as to whether they are enrolled in all applicable benefit programs, each utility has a duty to inquire if the customer is interested in hearing about applicable benefit programs if the utility has discussions with a residential customer prior to disconnection.³⁰ After being made aware of the applicable benefit programs, residential customers are then given two billing cycles to enroll in the program.³¹ In addition to these programs, certain CARE and FERA customers are also eligible for arrearage forgiveness through the AMP, for which SCE began enrolling customers on February 1, 2021.³²

V. Coordination with Other Entities

A. Community Choice Aggregators (CCA) Coordination

Placeholder for feedback from CCA on marketing and outreach strategy. SCE has not yet received complete feedback from CCAs on marketing and outreach strategy, and will update this section when input is received.

Pursuant to Resolution M-4849, SCE will share customer education materials with the CCAs in advance of their distribution to customers.³³ SCE has also proactively partnered with the CCAs in its service territory by providing the CCAs an opportunity to review the marketing and outreach strategy prior to the submittal of the draft to the Low-Income Oversight Board and met with the CCAs during the first week of March to solicit feedback.

B. Low-Income Oversight Board (LIOB)

Placeholder for feedback from LIOB. SCE anticipates updating this section after receiving feedback from the LIOB.

As directed in Resolution M-4849, SCE submitted a draft of this Advice Letter on February 25, 2021 to the LIOB and presented an overview of the contents at the March 11, 2021 LIOB quarterly meeting.

²⁹ *Id.*, OP 1(f).

³⁰ *Id.*, OP 1(c).

³¹ *Id.*

³² Resolution E-5114.

³³ Resolution M-4849, p. 13.

C. Water Agencies

Resolution M-4849 requested that SCE consider increasing the frequency with which energy and water IOUs exchange data on accounts enrolled in income-eligible programs so that eligible customers can be targeted for enrollment.³⁴ SCE is supportive of increasing the frequency of these exchanges and understands that the additional frequency can increase effectiveness of customer outreach. SCE will continue efforts to collaborate with the water agencies in its service territory on the sharing of data.

VI. Program Metrics

Resolution M-4849 required SCE to include a “plan for reporting progress in the timeline, and present metrics that will track and report to monitor success in achieving the goal of effectively easing customers through a transition off of Emergency Customer Protections.”³⁵ Specifically, the Commission required SCE to include a progress metric for each of the following areas:

- Customers who enrolled in a bill assistance program when protections were in place are successful in sustaining their enrollment in the program if they still meet eligibility criteria;
- New enrollments of impacted customers in payment programs since beginning implementation of the transition plan.

As a guiding principle SCE chose metrics that are:

- discretely defined
- quantitative data drive, and
- remove outside factors where possible.

The discretely defined metrics allow for comparisons between the energy IOUs and limit the potential for confusion. Metrics that are quantitative in nature serve to eliminate different interpretations of the same situation from multiple parties and the removal of outside factors help to focus the metrics on policies that can be influenced by the actions of the IOUs. To prevent data discrepancies, SCE sought to leverage currently available data points and reports wherever possible.

Table 6 provides an overview of SCE’s proposed metrics and methodology. SCE will include baseline data for each metric in the monthly reports required in R.18-07-005. The current monthly disconnection report in R.18-07-005 provides substantial information regarding residential customer arrearage levels, payment plans, and age of

³⁴ Resolution M-4849, p. 13.

³⁵ Resolution M-4849, p. 15.

arrears as well as disconnections by zip code. SCE proposes to utilize the following metrics:

Table 6: Incremental Transition Plan Metrics and Methodology

Metric	Methodology
<p>Customer retention post June 30, 2021:</p> <ul style="list-style-type: none"> • Percentage of customers that complete re-certification for CARE, FERA, and MBL programs • Percentage of customers that complete post-enrollment verification for CARE and FERA programs 	TBD
<p>Enrollments of impacted customers in new programs:</p> <ul style="list-style-type: none"> • Number of new monthly enrollments/participation in income-qualified programs: <ul style="list-style-type: none"> ○ CARE ○ FERA ○ LIHEAP ○ EAF 	TBD
<p>MBL</p> <ul style="list-style-type: none"> • Number of new enrollments in MBL 	TBD
<p>AMP</p> <ul style="list-style-type: none"> • Number of customers enrolled in AMP • Number of customers • Percentage of eligible customers enrolled in AMP 	TBD
<p>Small Commercial Customers</p> <ul style="list-style-type: none"> • Number of payment arrangements 	TBD

VII. Budget and Cost Recovery

Placeholder for any incremental budget needs outside of current funding. SCE is still evaluating which costs are incremental and which have defined budgets that can be utilized.

SCE intends continue recording activities associated with the Emergency Customer Protections will continue in the applicable COVID-19 Pandemic Protections Memorandum Account (CPPMA) and Residential Uncollectibles Balancing Account (RUBA) during the transition period.

TIER DESIGNATION

Pursuant to OP 5 of Resolution M-4849, SCE submits this advice letter with a Tier 2 designation.

EFFECTIVE DATE

This advice letter will become effective on May 1, 2021, the 30th calendar day after the date submitted.

NOTICE

Anyone wishing to protest this advice letter may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this advice letter. Protests should be submitted to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102
E-mail: EDTariffUnit@cpuc.ca.gov

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this advice letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:

Gary A. Stern, Ph.D.
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Telephone: (626) 302-9645
Facsimile: (626) 302-6396
E-mail: AdviceTariffManager@sce.com

Tara Kaushik
Managing Director, State Regulatory Affairs
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com

There are no restrictions on who may submit a protest, but the protest shall set forth specifically the grounds upon which it is based and must be received by the deadline shown above.

In accordance with General Rule 4 of GO 96-B, SCE is serving copies of this advice letter to the interested parties shown on the attached GO 96-B and the R.18-03-011, A.14-11-007, A.15-02-001, A.19-11-003, A.20-03-014, R.15-03-010, R.18-07-006, R.18-07-005, R.12-06-013, and A.19-09-014 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-4039. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by submitting and keeping the advice letter at SCE's corporate headquarters. To view other SCE advice letters submitted with the Commission, log on to SCE's web site at <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

For questions, please contact Eric Lee at (626) 302-0674 or by electronic mail at eric.lee@sce.com.

Southern California Edison Company

Gary A. Stern, Ph.D.

GAS:el:jm
Enclosures