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# **SOUTHERN CALIFORNIA GAS COMPANY'S COVID-19 EMERGENCY CUSTOMER PROTECTIONS TRANSITION PLAN<sup>s</sup>**

## **Purpose**

The purpose of this filing is to file a transition plan in accordance with the California Public Utilities Commission (Commission or CPUC) Resolution (Res.) M-4849, Authorization and Order directing investor-owned utilities (IOUs) to extend emergency customer protections to support California customers through June 30, 2021, and to file transition plans for the expiration of the emergency customer protections.

## **Background**

In Decision (D.) 19-07-015, the Commission established a permanent set of minimum emergency disaster customer protection measures that the utilities are mandated to implement in the event of a declared emergency.<sup>1</sup> Pursuant to (Ordering Paragraph (OP) 1, emergency disaster customer relief protections shall apply to utility customers in areas affected by a disaster declared a state of emergency by the Governor of California or the President of the United States. Consistent with D.19-07-015 OP 2, when a disaster has either resulted in the loss or disruption of the delivery or receipt of utility service and/or resulted in the degradation of the quality of utility services, the utilities must submit a Tier 1 Advice Letter (AL) with the Commission's Energy Division within 15 days of a governor's state of emergency declaration or a presidential state of emergency proclamation reporting compliance with the Decision's mandated emergency disaster customer relief protections.<sup>2</sup> On March 4, 2020, Governor Gavin Newsom (Governor) declared a State of Emergency in response to the outbreak of novel

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<sup>1</sup> D.19-07-015 at 4.

<sup>2</sup> D.19-07-015 OP 14.

coronavirus, COVID-19.<sup>3</sup> On March 13, 2020, President Trump signed an Emergency Declaration to facilitate a federal response to the emerging COVID-19 pandemic.<sup>4</sup>

The situation surrounding the COVID-19 pandemic is unprecedented and will continue to have a dramatic impact on all utility customers. SoCalGas recognizes the substantial financial hardships that many of its customers have been enduring due to COVID-19. In recognition of these hardships, SoCalGas remains committed to assisting its customers throughout the evolving pandemic and the transition from customer protections.

## I. Transition Plan Introduction

On March 4, 2020, Governor Gavin Newsom issued a State of Emergency that identified the COVID-19 pandemic as a disaster emergency affecting the State of California.<sup>5</sup> On March 16, 2020, Governor Newsom issued Executive Order N-28-20, requesting that the Commission monitor the measures by public and private utility providers to implement customer protections in response to COVID-19.<sup>6</sup> On March 17, 2020, Commission Executive Director Alice Stebbins directed utilities to submit ALs implementing the applicable customer protections set forth in D.19- 07-015 and to apply such protections retroactively to March 4, 2020, when the State of Emergency was declared.<sup>7</sup> On April 16, 2020, the Commission adopted Resolution (Res.) M-4842, Emergency Authorization and Order Directing Utilities to Implement Emergency Customer Protections to Support California Customers During the COVID-19 Pandemic, directing utilities to offer the protections adopted in D.19-07-015 to all residential and small business customers through April 16, 2021, with an option to extend that date.<sup>8</sup>

When the pandemic began to adversely affect California, SoCalGas voluntarily chose to implement a disconnection moratorium for its gas customers. SoCalGas also put in place additional customer protections, such as extending payment arrangements, and enacted other measures designed to ensure that customers continue to receive gas service regardless of their payment status. In response to the March 17, 2020 Letter

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<sup>3</sup> <https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-help-state-prepare-for-broader-spread-of-covid-19/>.

<sup>4</sup> <https://www.federalregister.gov/documents/2020/03/18/2020-05794/declaring-a-national-emergency-concerning-the-novel-coronavirus-disease-covid-19-outbreak>.

<sup>5</sup> <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.4.20-Coronavirus-SOE-Proclamation.pdf>.

<sup>6</sup> <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.16.20-Executive-Order.pdf>.

<sup>7</sup> [https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News\\_Room/NewsUpdates/2020/Exec%20Director%20Letter%20to%20Energy%20Companies%20re%20COVID-19%20March%2017,%202020.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2020/Exec%20Director%20Letter%20to%20Energy%20Companies%20re%20COVID-19%20March%2017,%202020.pdf).

[https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News\\_Room/NewsUpdates/2020/Exec%20Director%20Letter%20to%20Energy%20Companies%20re%20COVID-19%20March%2017,%202020.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2020/Exec%20Director%20Letter%20to%20Energy%20Companies%20re%20COVID-19%20March%2017,%202020.pdf).

<sup>8</sup> <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M333/K482/333482381.PDF>

from Executive Director Stebbins and Res. M-4842, SoCalGas submitted AL 5604-B on May 22, 2020, affirming its compliance with specific emergency customer protections and outreach activities in light of the COVID-19 pandemic.<sup>9</sup> In AL-5604-B, SoCalGas provided a detailed response to address the customer protections listed in Resolution M-4842, as well as SoCalGas' outreach regarding those emergency customer protections. Those customer protections included: (1) Implement payment plan options for residential customers; (2) Suspend disconnection for non-payment and associated fees; (3) Waive deposit and late fee requirements; (4) Suspend all California Alternate Rate for Energy (CARE) program removals to avoid unintentional loss of the discounted rate during the period for which the customer is protected under these customer protections; and (5) Discontinue generating all recertification and verification requests that require customers to provide their current income information.

Currently, California's COVID-19 daily diagnosis statistics remain high<sup>10</sup>, and many businesses are not operating at full capacity which means that the economy is still exhibiting a downturn. However, the situation has improved since March 2020 in that the Governor, has lifted the most regional stay at home order directive and permitted the reopening of businesses.<sup>11</sup> Of significance, California's unemployment numbers have improved from 16.4% in April 2020 to 9.0% in December 2020.<sup>12</sup> As the pandemic and economic situation has evolved, so does the need to evolve from the emergency customer protections. Other states have moved or are transitioning from disconnection moratoriums and COVID-19 relief protections and have designed transition plans to assist payment troubled customers keep utility service.<sup>13</sup> Similarly, the CPUC has recognized the need to evolve from the COVID-19 Emergency Customer Protections.

On February 11, 2021, the Commission adopted Res. M-4849, Authorization and Order Directing Utilities to Extend Emergency Customer Protections to Support California Customers Through June 30, 2021, and to File Transition Plans for the Expiration of the Emergency Customer Protections.<sup>14</sup> Res. M-4849 requires the Investor-Owned Utilities (IOUs) to file a transition plan "to facilitate a smooth transition for customers when the Emergency Customer Protections are lifted."<sup>15</sup> The IOUs are directed to "design the transition plan to effectively ease customers through a transition off of the Emergency

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<sup>9</sup> <https://www2.socalgas.com/regulatory/tariffs/tm2/pdf/5604-B.pdf>.

<sup>10</sup> See Johns Hopkins University & Medicine tracking of daily confirmed new cases at <https://coronavirus.jhu.edu/region/us/california>.

<sup>11</sup> [https://www.cdph.ca.gov/Programs/OPA/Pages/NR21-030.aspx?mc\\_cid=825c65a153&mc\\_eid=33985fcbf3](https://www.cdph.ca.gov/Programs/OPA/Pages/NR21-030.aspx?mc_cid=825c65a153&mc_eid=33985fcbf3).

<sup>12</sup> [https://ycharts.com/indicators/california\\_unemployment\\_rate](https://ycharts.com/indicators/california_unemployment_rate).

<sup>13</sup> See, e.g., Finding and Order, In the Matter of the Application of Ohio Power Company, Case Nos. 20-602-EL-UNC, et al. (May 6, 2020) ("AEP Order") at ¶ 25 (instructing utilities to submit comprehensive plans describing their expectations for safely resuming activities to a pre-COVID-19 basis).

<sup>14</sup> <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M365/K448/365448995.PDF>

<sup>15</sup> Res. M-4849 at 10.

Customer Protections.”<sup>16</sup> The transition plan must include: “1) a timeline of new activities and resumed activities, 2) a marketing, education, and outreach (ME&O) strategy, 3) an explanation of how the activities timeline and ME&O strategy account for compliance and safety, and 4) a progress tracking and reporting plan.”<sup>17</sup> The goal of the transition plan is to proactively enroll customers in programs to manage their utility bills and inform relevant customers of the changes to programs they are already on.”<sup>18</sup>

Recognizing the Commission’s goal to effectively transition customers off customer protections, SoCalGas proposes the following transition plan (“Transition Plan” or “Plan”) that contemplates the resumption of normal business activities, including resuming disconnections for non-payment as of June 30, 2021.

Most of the collection processes are supported by SoCalGas’ Customer Information System (CIS). CIS is a legacy system that has been in place for decades and has been optimized over time to run efficiently. SoCalGas’ CIS has been integrated in a way that meets the requirements of the company’s Commission-approved tariffs and harmonizes with SoCalGas’ customer service and operational needs. Making modifications in CIS to one collections process may have impacts to other interfacing systems in other areas. Given the unprecedented nature of restarting collections after a 15-month pause, there may be unforeseeable issues associated with executing the collections cycles. Accordingly, SoCalGas believes making minimal modifications when restarting the non-emergency collections process is the most reliable and robust way to serve and support our customers. In this manner, SoCalGas can ensure that we have the best consequences, with the best visibility and control to carry out the collections process as intended with minimal errors and challenges. Therefore, the transition plan presented below makes only minimal modifications to SoCalGas’ collections process.

SoCalGas recognizes the impact the pandemic has had on our customers, including the newly unemployed, our most vulnerable customers and small businesses, and SoCalGas has worked to promote relief options to assist customers facing financial hardship. From the beginning of this pandemic, SoCalGas has remained committed to helping customers navigate uncertainty and economic hardship. With this Transition Plan, SoCalGas’ goal is to implement a plan that can assist customers to effectively transition for the short term. However, none of us know how long we are going to have to live with this pandemic or its economic consequences. For these reasons and because of the dynamic nature of the pandemic, SoCalGas’ implementation of the Transition Plan requires flexibility. SoCalGas reserves the right to implement specific provisions of the Transition Plan, including longer term options, based upon the trajectory of the pandemic, the status of the economy, any new information, or

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<sup>16</sup> *Id.*

<sup>17</sup> *Id.*

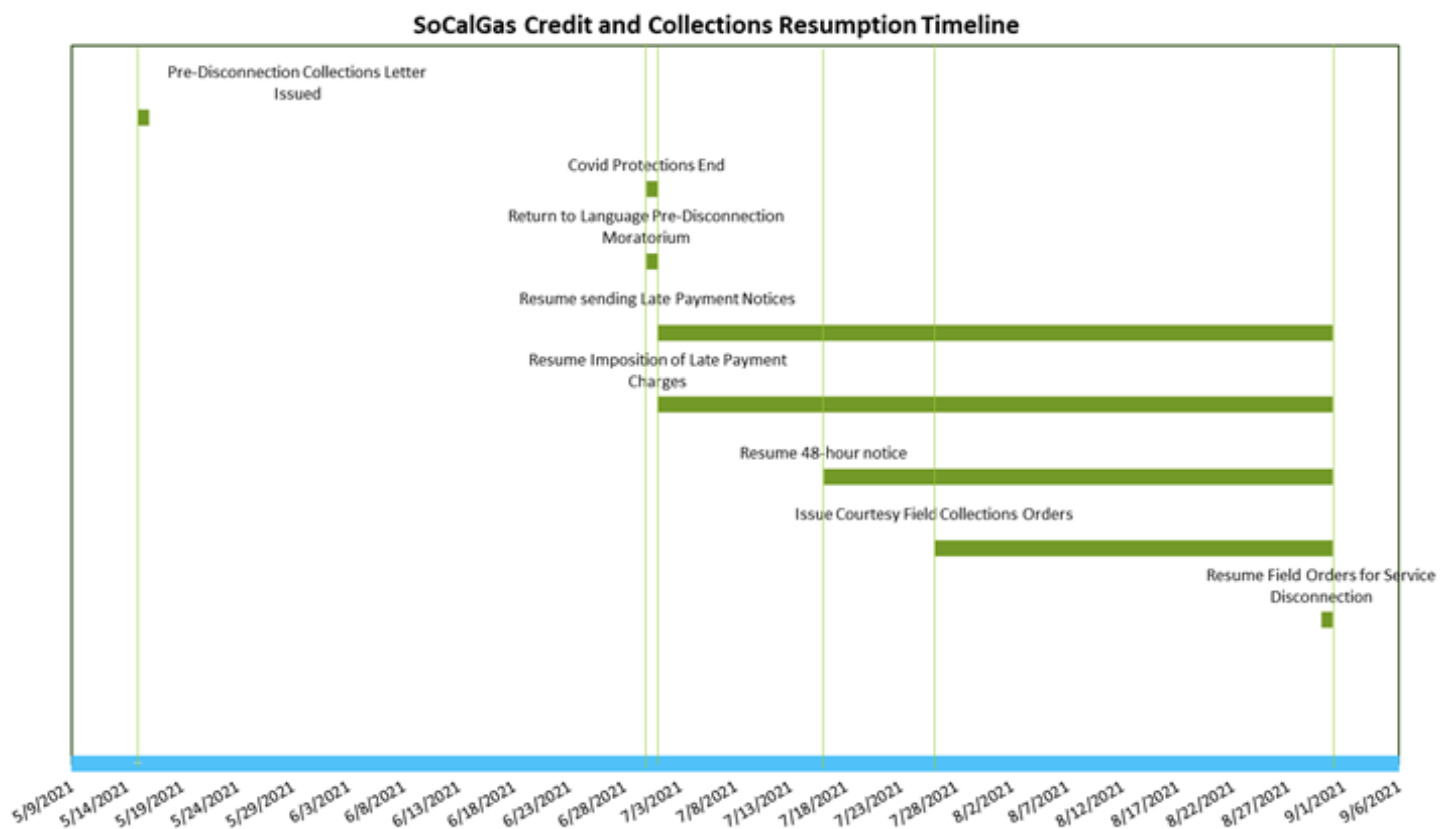
<sup>18</sup> Res. M-4849 at 34.

Commission directive so that SoCalGas' and its customers interests continue to be considered.

SoCalGas will 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 SoCalGas' employees, customers and the general public.

## II. SoCalGas Transition Plan

### 1. Credit and Collections Tactical Plan and Activities Timeline



## **A. Resumption of disconnections for non-payment**

SoCalGas recognizes the ongoing impact of COVID-19 on customers' finances, health and general wellbeing, and it is not the Company's desire to potentially aggravate any customer's situation by disconnecting their natural gas service; thus, the Company remains committed to working with all of its customers through the transition period. SoCalGas details below how it expects it would cautiously and strategically resume the regulated disconnection process once the disconnection moratorium is lifted and the consumer protections expire. SoCalGas' plan for resuming disconnections has been designed to protect its vulnerable customers during the ongoing pandemic, particularly those who are low income including the newly low income.

Preliminarily, SoCalGas' Rule 9 contains robust pre-disconnection customer protections.<sup>19</sup> SoCalGas would like to underscore that, once normal disconnection procedures are restored, SoCalGas will follow all existing consumer protections including sending payment reminders (via letter, email, and proactive outbound calls), fresh 15-day notices, and fresh 48-hour notices prior to engaging in any disconnections. During those interactions, SoCalGas also will provide information to customers with respect to low-income assistance programs, payment arrangement options, and Arrearage Management Plan (AMP). As stated above, SoCalGas will only make minimal adjustments to our non-emergency collections processes to ensure a reliable and smooth transition for our customers to normal operations.

Disconnections for SoCalGas will resume on August 30, 2021. SoCalGas will not disconnect any customer who: (1) has a Low Income Home Energy Assistance Program (LIHEAP) pledge pending, (2) makes a payment of at least 20% of the amount due and agrees to an installment payment plan for the remainder of the balance, (3) who is on Medical Baseline, (4) is enrolled in AMP, or (5) who agrees to enroll in AMP or a twelve-month payment plan. In addition, SoCalGas will not disconnect any customer in excess of the 2% system cap on disconnections or the 30% zip code cap on disconnections.

### **Collections Communication**

Under SoCalGas' Transition Plan, SoCalGas will issue a "pre-disconnection" letter informing all affected customers of the impending lifting of the disconnection moratorium. All residential and small business customers who have arrears at the time of the communication that could subject them to disconnection, including CARE customers, will be mailed or e-mailed this letter, depending on the customer's indicated preference, reminding them of the need to stay current on their bills and providing

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<sup>19</sup> <https://www2.socalgas.com/regulatory/tariffs/tm2/pdf/09.pdf>.



information on how to contact SoCalGas to enroll in available programs, if needed. The communication will: (1) inform the customer that they are at risk of disconnection after the moratorium is lifted; (2) indicate a general time range when the customer will likely be disconnected unless the customer takes appropriate steps; and (3) be sent to the customers on or about May 15, 2021, at least forty-five days prior to the issuance of the standard 15-day disconnection notice contained in Rule 9 of SoCalGas' tariff.

Once the disconnection moratorium is lifted, SoCalGas intends to restart its Collections process. Effective July 1, 2021, SoCalGas will resume sending late payment notices (LPN's) to customers who are in the billing cycle running on that day and will continue each regular business day thereafter. 11 business days after the first LPN's are issued, on July 16, 2021, customers who received a late payment notice on July 1, 2021, and who have not yet paid their amount due, will receive a 48-hour notice, either via email, automated outbound dialing, via mailed notice or via an in person visit. 6 business days later, on July 26, 2021, customers who have still not paid will be issued "collect-or-close" orders.

After March 4, 2020, SoCalGas softened the language on late payment notices for residential customers and small business customers. ("Did you overlook..." vs "To avoid disconnection of service..."). Effective July 1, 2021, SoCalGas will resume using the language in use before the disconnection moratorium and include information regarding available programs to assist customers experiencing financial hardships.

### **In Person Collections**

During July and August 2021, SoCalGas' field collectors will begin to make field visits, keeping compliance with COVID-19 safety protocols, to provide more information for customers regarding their current arrearages, available payment arrangements, and assistance programs, but not to disconnect. These steps are intended to help customers to take proactive action to limit their arrearages. SoCalGas will continue to reach out to customers to engage them and help them understand the need to continue to manage their gas accounts.

### **B. Payment Plan Options**

There will be substantial opportunity for customers to interact with SoCalGas for making payment arrangements to maintain their utility service, and thus avoid disconnection. This opportunity for interaction is important because throughout the disconnection moratorium SoCalGas has offered payment arrangements. SoCalGas intends to continue to offer payment arrangements once the disconnection moratorium is lifted and

customer protections expire, including the new AMP program<sup>20</sup> and the new 12-month payment plan in addition to existing programs.

### **Residential Customers**

Unless otherwise directed by the Commission, SoCalGas will offer a payment arrangement for a period of up to twelve months<sup>21</sup> to residential customers with past due amounts or defer the entire past due balance for a period of up to three months. A residential customer who remains current on a payment arrangement and current bill will not be disconnected.

### **Small Business Customers**

Unless otherwise directed by the Commission, SoCalGas will offer a payment arrangement for a period of up to twelve months to small business customers, as defined by SoCalGas' tariff<sup>22</sup>, with past due amounts. A small business customer who remains current on the payment arrangement and current bill will not be disconnected. SoCalGas will not require additional statement of hardship or need for the purpose of qualifying business customers for payment arrangements.

### **C. Resumption of late payment charges**

SoCalGas does not apply late payment charges for residential customers. SoCalGas will begin to apply late payment charges for small business customers beginning July 1, 2021. Late payment charges will be waived for any amount the customer has requested to be billed as part of an installment payment plan.

### **D. Reconnections**

In compliance with D.20-06-003, SoCalGas no longer charges a fee for residential customers for reestablishment of service after a disconnection. In addition, SoCalGas is committed to reconnecting a customer within 24 hours of the customer making a payment.<sup>23</sup> SoCalGas aims to restore natural gas service for impacted customers as soon as practicable with a primary emphasis on the safety of its customers and employees. SoCalGas also conducts safety checks before restoring natural gas service when entering each home.

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<sup>20</sup> SoCalGas' AMP AL 5689 was approved in Res. E-5114.

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M355/K728/355728317.PDF>

<sup>21</sup> <https://www2.socalgas.com/regulatory/tariffs/tm2/pdf/09.pdf>

<sup>22</sup> *Id.*

<sup>23</sup> Reconnection times differ across the IOUs. See D.18-12-013 at 3.



## **E. SoCalGas Branch Offices**

SoCalGas's Branch Offices are currently closed in compliance with the State's safety protocols for the COVID-19 pandemic. While all other payment options (mail, online, authorized payment locations, credit card through third party, etc.) remain available, to ensure the safety of customers and employees and compliance with state and local COVID-19 health orders, SoCalGas branch offices will remain closed until they are permitted to be reopened. Payments through authorized payment locations have been an important payment channel for restoring service after a customers' service has been disconnected. After disconnections resume, SoCalGas' authorized payment locations may remain closed based on state and local health orders.

### **2. CARE Program Tactical Plan and Activities Timeline**

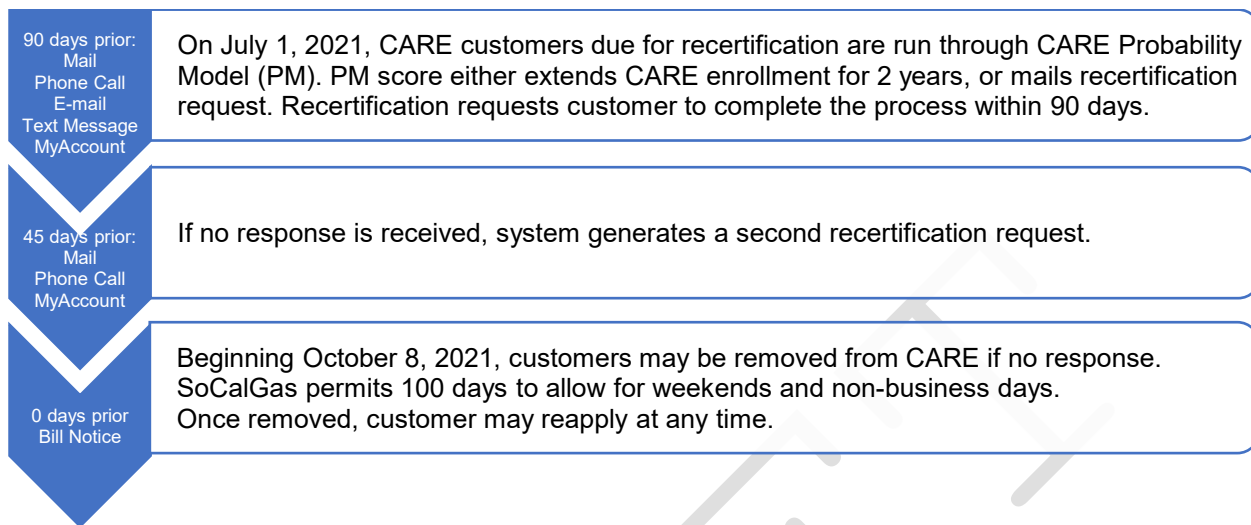
In addition to procedural protections, financial assistance for residential customers in the form of the CARE program, LIHEAP and one-time hardship relief known as the Gas Assistance Fund (GAF), are available to low-income customers, where low-income is defined as those residential customers whose household income is at or below 200% of the Federal Poverty Level Guidelines, or who are enrolled in a qualifying public assistance program. These programs are fully operational and immediately accessible to customers who continue to be affected financially as a result of the pandemic.

Once the COVID-19 customer protections expire, SoCalGas plans to restart existing procedures of running CARE customers through the CARE probability model to determine participants most likely to qualify, and exempt those from future requests for one 2-year cycle. Certain customers who don't pass the probability model will need to provide proof of eligibility, as was standard business practice prior to COVID-19 pandemic.

SoCalGas recommends extending program enrollment to customers who were due to recertify during the COVID-protection period (March 2020-June 2021), for one additional year to lessen the likelihood of customers falling off the program. Approximately 916,702 customers were due to recertify during the timeframe mentioned above.

Once recertifications resume, CARE customers deemed likely to qualify will be exempt from recertification for one enrollment cycle. Those deemed not likely to qualify will receive a recertification request with 90 days to respond prior to program removal as shown in the timeline below. To complete the recertification process, the existing CARE customer must confirm that they still meet the program's eligibility requirements. Customers do not need to provide proof of income during the recertification process.

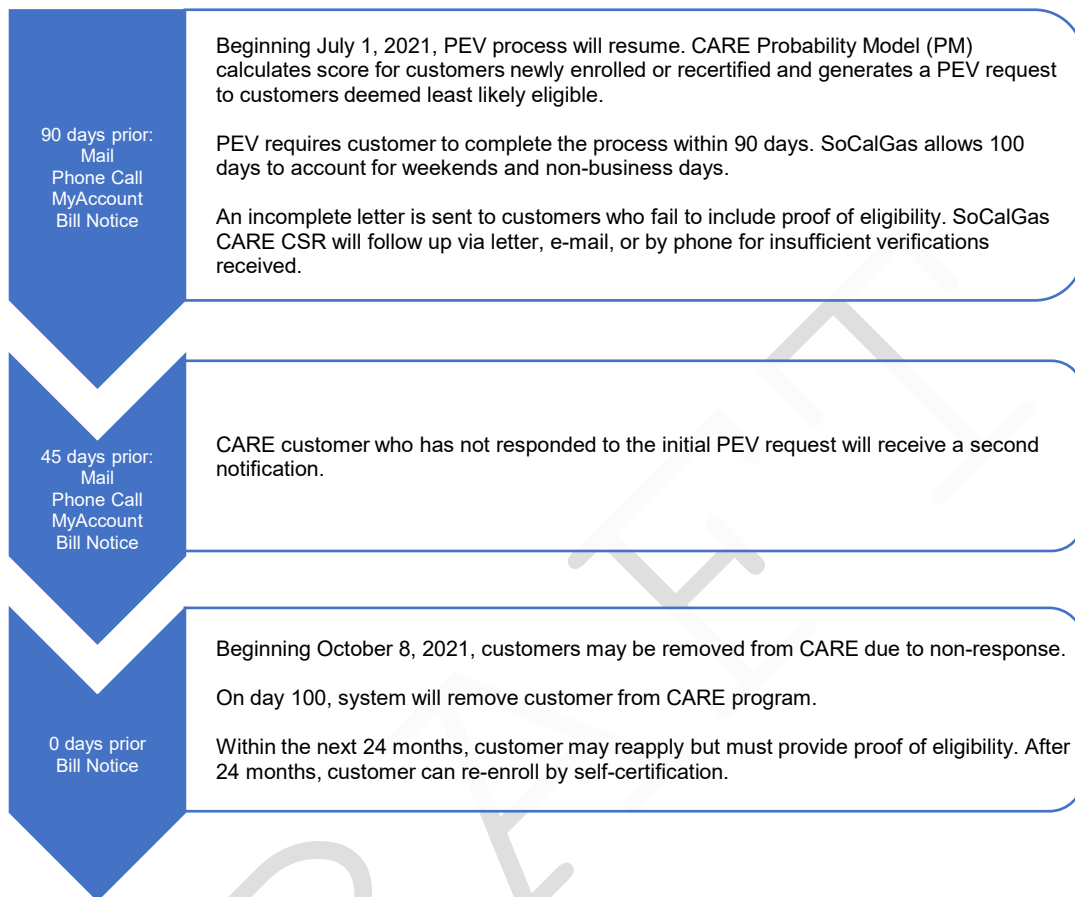
### Existing CARE Recertification Process and Timeline



As stated above, SoCalGas will restart its verification process to perform post-enrollment verification (PEV) at an annual rate of 2%, with the flexibility to adjust as needed up to 200% of that level for any given year as stated in Advice Letter 4537.<sup>24</sup> Any CARE customers enrolled or recertified since the COVID-19 period will run through the CARE probability model. Customers deemed least probable to qualify for the program will be selected for post-enrollment verification and sent a verification request with 90 days to respond as shown in the timeline below.

<sup>24</sup> <https://www2.socalgas.com/regulatory/tariffs/tm2/pdf/4537.pdf>.

## CARE Verification Process and Timeline



SoCalGas plans to continue the pre-COVID protections notification process in which after the initial recertification or PEV request is initiated, customers receive a call to inform them to expect an application in the mail. For recertification, the message explains that it is time to renew eligibility, and failure to do so will result in termination from the discount. The PEV message explains that to remain on CARE, proof of income or proof of participation in one of the assistance programs listed on the application, is required. Failure to respond will result in termination from CARE and back-billing for up to three months. Customers who answer the call, can select to hear the message in English or Spanish. If the call goes to voicemail, the respective message is left in both English and Spanish. A second recertification or PEV request is mailed to customers who do not respond within 45 days to the first respective mailing. Again, the customer receives the heads-up automated call. Customers can also see the request for recertification or verification on their gas bill and once they log into My Account. Customers may submit copies of requested documentation via U.S. Postal Service, fax, web, My Account, or by email. My Account and email are two expedient options that provide customers assurance that the materials they submit will be promptly delivered to SoCalGas.

SoCalGas plans to continue sending text messages to targeted lists of CARE customers whose applications have recently expired. The messaging encourages customers to reapply (a direct URL is provided) in order to continue receiving their 20 percent bill discount.

SoCalGas CARE representatives are also available to speak to customers and respond to daily inquiries regarding CARE and offer immediate enrollment or recertification over the phone Mondays to Fridays from 7am to 4pm. CARE recertification can also be completed over the phone using SoCalGas' Interactive Voice Response (IVR) system which is an option available in English and Spanish for CARE customers 24/7 (call **1-866-716-3452**).

All CARE customers will continue to have the ability to confirm their participation by viewing the CARE icon and itemized discount amount on their bills. Their CARE status is also available when viewing their account online in My Account.

During 2020, to support CARE Capitation agencies, Capitation Program information and instructions were added to [socalgas.com/care](http://socalgas.com/care) as well as the CARE brochure specifically designed for the agencies to download for their clients. SoCalGas also launched a web link for authorized Capitation agencies to assist customers with their CARE enrollment process online. The web link tracks their source code so they can receive credit for new CARE enrollments.

#### **5. SoCalGas Medical Baseline Tactical Plan:**

The Medical Baseline Allowance program provides additional gas at the lowest baseline rate for households with individuals in the home who have a serious health condition. To qualify for the program, a licensed medical practitioner must certify that a resident in the home has a medical issue that requires heating and/or cooling and/or it is medically necessary to prevent deterioration of the patient's medical condition: paraplegic, quadriplegic, hemiplegic, multiple sclerosis or scleroderma, a compromised immune system, life-threatening illness, or any other condition.

Senate Bill 598 (SB) sets forth circumstances under which a customer shall not be disconnected for nonpayment, including customers receiving a medical baseline allowance, a customer (or member of their household) receiving hospice care, customer dependence on life-support equipment, or the presence of medical conditions requiring electric and natural gas service to sustain life or prevent deterioration of the medical condition.<sup>26</sup> Specifically, SB 598 prohibits gas or electrical corporations from disconnecting customers who utilize a medical baseline allowance, are financially unable to pay, agree to a payment plan, and either are under hospice care, on life-support equipment, diagnosed with a life-threatening condition.<sup>27</sup> Medical Baseline customers who are protected by the customer protection plan and not removed from the

program due to non-response, or not sent a recertification/verification request, will be sent a recertification request for completion.

Beginning July 1, 2021, SoCalGas will lift all voluntarily implemented protections for medical baseline customers mentioned above. Customers who require recertification will receive a 60-day reminder notification to recertify eligibility in the medical baseline program on July 1, 2021, at the earliest. Customers who no longer meet the eligibility requirements for the medical baseline program or who fail to recertify will be removed from the medical baseline program. The earliest a customer will be removed from the medical baseline program is September 1, 2021.

<b>Medical Baseline Recertification Notifications Timeline</b>	
Communication	Timing
Email notification #1 – telling customers they will be unenrolled in 60 days if no action is taken	60 days before removal from medical baseline program
Direct mail notification #1 – telling customers they will be unenrolled in 60 days if no action is taken	60 days before removal from medical baseline program
Email notification #2 – telling customers they will be unenrolled in 30 days if no action is taken	30 days before removal from medical baseline program
Direct mail notification #2 – telling customers they will be unenrolled in 30 days if no action is taken	30 days before removal from medical baseline program
Confirmation of removal from program – message telling customers they will no longer receive the Medical Baseline discount/provides instructions on how to re-enroll	0 days before removal from medical baseline program

In addition to the timeline above, SoCalGas plans to continue the pre-COVID recertification process. An initial recertification request will be mailed on the 1<sup>st</sup> day of the month the customer is due to recertify. A second recertification is mailed to customers who do not respond within 45 days to the first respective mailing. Customers who do not respond after 90 days are removed from the Medical Baseline program. Customers may submit copies of requested documentation via U.S. Postal Service, fax, or by email.

SoCalGas Medical Baseline Allowance program representatives are also available to speak to customers and respond to daily inquiries regarding the Medical Baseline program over the phone, Monday through Friday from 7am-4pm.

**Gas Assistance Fund (GAF)**

Since 1983, the Gas Assistance Fund (GAF) program has provided bill assistance to households experiencing financial hardships created by rising natural gas bills. GAF helps customers by providing a grant of up to \$100. The program is funded by a combination of shareholder contributions and customer donations. GAF eligibility is based on CARE income guidelines and customers can receive the grant once per program year.

Before the onset of COVID-19, the GAF program offered funds from the first Tuesday of February until May 31, 2021, or until funds are depleted, whichever comes first. However, in response to the economic challenges brought by the COVID-19 pandemic, SoCalGas continued the program until December 31, 2020 and increased the grant amount by \$100 (to up to \$200) to seniors 65 years of age and older and to households impacted by the pandemic. The additional \$100 amount will expire on July 1, 2021, however, subject to the availability of funds, customers will still be able to apply to receive a one-time grant of up to \$100.

3,192 households received a GAF grant in 2020. GAF is administered by the United Way of Greater Los Angeles. There are over 70 volunteer GAF agencies located throughout SoCalGas' service territory.

**Low-Income Home Energy Assistance Program (LIHEAP)**

The Low-Income Home Energy Assistance Program (LIHEAP) program is a federally funded program overseen by the California Department of Community Services and Development (CSD) and administered by 31 Local Service Providers throughout California. LIHEAP assists low-income households with their energy costs, including bill payment assistance, energy crisis assistance, weatherization, and energy-related home repairs. The program is open year-round, and customers may receive LIHEAP assistance once per calendar year with certain exceptions granted on a case-by-case basis.

LIHEAP provides up to \$1,000 in financial assistance to pay utility bills as well as home weatherization costs. Program eligibility is based on federal income guidelines. LIHEAP prioritizes applicants based on the greatest need and income, as well as households with vulnerable populations, including the elderly, disabled, and households with young children.



### 3. Marketing, Education & Outreach Communications Strategy

#### Objectives

- Create awareness through meaningful communications and sharing of key dates
- Educate customers of their account's current standing and provide clear information as to available customer assistance resources
- Help support customers out of arrears
- Provide consistent, tailored, and relevant information across target audiences

SoCalGas's Marketing, Education, and Outreach (ME&O) strategy will inform customers of the end of the customer protections and disconnection moratorium after June 30, 2021. SoCalGas will focus communications on available customer assistance programs and financial assistance opportunities to motivate willing and eligible customers at risk of disconnection to enroll and/or recertify as soon as possible. SoCalGas remains mindful of the significant hurdles the pandemic has brought about and will continue to prepare to pivot and adjust timing and planning as necessary.

SoCalGas's goal is to provide meaningful, clear, and direct support to customers during what remains a very challenging time. SoCalGas respectfully reserves the right to alter its marketing campaign timing based on the current pandemic and other unforeseen factors.

SoCalGas plans to continue its communication efforts that have been utilized throughout the pandemic and build on its outreach efforts to add focused support and communication for customers with past-due balances. SoCalGas will also provide multi-lingual and multi-channel communications to drive awareness of upcoming changes in customer protections and provide access to support programs and resources to help ease the lifting of customer protections.

#### Target Audience

SoCalGas will target distinct audiences within the SoCalGas service territory, focusing on targeted messaging within subsets of the following groups:

- The general customer population currently on standard payment plans and not directly impacted by the ending of these protections for awareness and transparency. It will be shared that assistance services are available if they've experienced a change in income.

- Customers with past due bills on the verge of disconnection and in need of financial assistance/program support.
- Low-income customer population directly impacted by the ending of the customer protections needing support to avoid possible disconnection.
  - Customers currently enrolled in the California Alternate Rates for Energy (CARE) program, and who are eligible for the Arrearage Management Plan (AMP) and/or Medical Baseline (MBL).
  - Customers currently enrolled in the CARE program, and who are ineligible for AMP and/or MBL.
  - Customers not currently enrolled in CARE, and who are enrolled in MBL.
- Small business customers using less than 10,000 therms a year.

### **Timeline**

SoCalGas has been using, and will continue to use, a variety of marketing and communication tactics to reach out to customers to educate and inform them of all the assistance options available after the expiration of the customer protections. Beginning 30-45 days before the collection process begins, SoCalGas will launch targeted communications to inform the customers of assistance options.

### **The communication and marketing tactics will include the following:**

#### **Digital**

- SoCalGas's current COVID-19 webpage will be enhanced to explain the ending of the Emergency Customer Protections after June 30, 2021. This webpage will be continually updated and available on an ongoing basis, as needed, and will feature information about available customer assistance programs and services, including details and criteria for repayment options and past due bill forgiveness;
- Tailored messaging targeted to My Account customers based on the current standing of their account;
- An email campaign with assistance program information to customers in arrears;

#### **Customer Contact Center (CCC)**

- Customer Contact Center (CCC) script updates;
- Talking points for customer-facing employees, both in the field and at call centers, on the expiration of customer protections and assistance options for residential and small business customers;

**Direct Mail**

- Bill inserts and bill messaging outlining assistance options for residential customers;

**Telecommunication**

- A targeted outbound call campaign with assistance information to customers in arrears;
- A targeted outbound LIHEAP-call campaign to previous LIHEAP recipients;
- Use of Interactive Voice Response (IVR) messaging;

**Internal Support**

- Regional Public Affairs to disseminate handouts, educate city staff/personnel, and provide on-site communication;

**Outside Organizations**

- Leverage existing relationships with Community- and Faith-Based Organizations (CBOs and FBOs) to provide handouts and provide education to these organizations to help inform hard-to-reach customers about the end of protections and available customer assistance programs.

**Accessibility, Outreach, and CBO/FBO Coordination**

Information and marketing collateral will be available in non-English languages and will be provided to branch payment offices (BPOs) and authorized payment locations (APLs). Information and collateral will also be provided to Community- and Faith-Based Organizations that work with mono-lingual and/or limited English proficiency customers. Customers with disabilities and those that need accommodations due to access and functional needs (AFN) will be provided with specific information about the ending of protections, as well as available programs that serve these customers, including bill assistance/arrearage management, the Medical Baseline program, and other relevant customer assistance programs.

**ME&O Budget**

SoCalGas's ME&O strategy plans to utilize existing budget and communications plans and does not foresee requesting additional funds for its customer communications efforts.

#### **4. Collaboration with other agencies**

##### **Water Data Sharing**

Pursuant to D.11-05-004, SoCalGas and SDG&E are required to twice yearly exchange customer data with water utilities to streamline the enrollment in SoCalGas' low-income assistance programs.<sup>25</sup> As reported in the California Water Association Meet and Confer report regarding low-income data exchange process on December 1, 2020, SoCalGas agreed to accommodate more frequent CARE data exchanges, with no changes to format, consistent with the additional exchange performed in 2020, up to a maximum frequency recommended to be no more than quarterly.

#### **5. Progress Tracking and Reporting**

Despite the transition plan activities and assistance programs cited above, there is continuing uncertainty over the magnitude and duration of economic hardship caused by the pandemic. In this situation it would be appropriate for the Commission to continue to monitor the situation after lifting the disconnection moratorium and customer protections by reviewing monthly reports for progress tracking and reporting. SoCalGas plans to track and report on the transition plan activities using existing reporting tools such as the monthly disconnection report; AMP reports; payment arrangement and extension reports and collections reports; IOUs monthly low-income programs reports, and CARE enrollment tracking reports.

##### **Protest**

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received within 20 days of the date of this Advice Letter, which is April xx, 2021. The address for mailing or delivering a protest to the Commission is given below.

CPUC Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102

A copy of the protest should also be sent via e-mail to the attention of the Energy Division Tariff Unit ([EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)). Due to the COVID-19 pandemic and the shelter at home orders, SoCalGas is currently unable to receive protests or comments to this Advice Letter via U.S. mail or fax. Please submit protests or

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<sup>25</sup> D.11-05-004, 2011 WL 1903754 (May 5, 2011).

comments to this Advice Letter via e-mail to the address shown below on the same date it is mailed or e-mailed to the Commission.

Attn: Ray B. Ortiz  
Tariff Manager - GT14D6  
555 West Fifth Street  
Los Angeles, CA 90013-1011  
Facsimile No.: (213) 244-4957  
E-mail: [ROrtiz@socalgas.com](mailto:ROrtiz@socalgas.com)

### **Effective Date**

SoCalGas believes this Advice Letter is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to General Order (GO) 96-B. SoCalGas respectfully requests that this submittal be approved on May xx, 2021, which is 30 calendar days after the date submitted.

### **Notice**

A copy of this Advice Letter is being sent to SoCalGas' GO 96-B service list and the Commission's service list in R.18-03-011. Address change requests to the GO 96-B service list should be directed via e-mail to [Tariffs@socalgas.com](mailto:Tariffs@socalgas.com) or call 213-244-2837. For changes to all other service lists, please contact the Commission's Process Office at 415-703-2021 or via e-mail at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).

/s/ Joseph Mock  
Joseph Mock  
Director - Regulatory Affairs

Attachments