



Joint Large Energy IOU Presentation on **DRAFT** Transition Plans

Low Income Oversight Board Meeting
Webex
March 11, 2021

Agenda and Schedule

AGENDA:

- Marketing, Education, and Outreach Channels
- Benefit programs available to customers
- Alignment on resumption of activities
- IOU specific slides and Q&A
 - PG&E
 - SCE
 - SDG&E
 - SoCalGas

SCHEDULE AND NEXT STEPS:

- ✓ 2/25/21 – *Draft* Transition Plans sent to Gillian / LIOB
- ✓ 3/4/21 – Presentation sent to Gillian / LIOB
- **3/11/21** – **Quarterly LIOB meeting**
- 3/19/21 – Requested date for LIOB comments
- 4/1/21 – Submission of Transition Plans (Tier 2 AL)



Marketing, Education, and Outreach Channels

Communications Regarding End of Emergency Customer Protections:

- Webpages
- Outbound E-mails
- Bill Inserts and Messaging
- Direct Mail
- Community- & Faith-Based Organization (CBO/FBO) Engagement
- Customer Call Center (CCC) Communication
- CCA and other agency engagement

Examples of Additional Channels for Ongoing Assistance Program Enrollment Marketing:

- Newsletters
- Radio
- Digital Advertising and Search Marketing
- Social Media

- Large energy investor-owned utilities (IOUs) are generally aligned in marketing channels.
- Communication regarding benefit programs for customers will continue and each IOU intends to begin notifying customers of end of the COVID-19 Emergency Customer Protections at least **60 days before** the end date.



Benefit Programs Available to Customers

- California Alternate Rates for Energy (CARE)
- Family Electric Rate Assistance Program (FERA)
- Medical Baseline (MBL)*
- Low-Income Home Energy Assistance Program (LIHEAP)
- Energy Savings Assistance (ESA)
- 12-month payment plans
- Arrearage Management Plan (AMP)**
- Other Bill Relief Programs:
 - PG&E: Relief for Energy Assistance through Community Help (REACH)
 - SCE: Energy Assistance Fund (EAF)
 - SoCalGas: Gas Assistance Fund (GAF)
 - SDG&E: Neighbor-to-Neighbor (N2N)

* Customer must have qualifying medical equipment/device.

** Customer must be enrolled in Residential CARE/FERA to be eligible.



Alignment on Resumption of Activities

Residential and Small Business Customers

Customer Disconnection Policy

- **At the conclusion of Emergency Customer Protections (6/30/21), no customer will be immediately eligible for disconnection.**
 - The earliest a customer can be disconnected is not until late August.
- All IOUs will ramp up collections related activities over time giving customers the opportunity to receive and react to marketing and outreach efforts.

Length of Payment plans to be offered

- Residential and Small Business Customers will be offered payment plans up to 12-months

Residential Customers Only

Deposits and Reconnection Fees

- Residential Customer deposit and reconnection fees have been eliminated pursuant to D.20-06-003

CARE, FERA, MBL, and ESA customers

- Reinstatement of verification and re-certification requirements for CARE, FERA, and MBL
- No change for ESA as activities resumed in May/June 2020

Small Business Customers Only

Deposits and Reconnection Fees

- Small Business Customer deposit requests and reconnection fees will resume on July 1, 2021.

COVID Customer Protections Transition Communications Plan - Overview

	Residential Customers			Small Business Customers
Target Audience	General Residential	Enrolled in Income Qualified Programs (IQP)	IQP-enrolled – Past Due and Meet Arrearage Management Plan (AMP) Eligibility Criteria	Past Due and Meet Size of Business Criteria
Key Messages	PG&E is committed to helping customers. We offer bill payment options and programs that can help you better manage your bill.	In these tough times, we're dedicated to serving our customer's needs. Together we can find solutions that work for you.	If you are struggling to pay your energy, we offer special relief and bill assistance programs.	We understand the increasing struggles businesses are facing, and we remain committed to helping you find ways to save energy and money.
Example Programs, Services and/or Tools Marketed	<p>Convenient Ways to Pay</p> <ul style="list-style-type: none"> Flexible payment arrangements One-time payments Recurring payments Budget Billing <p>Financial Assistance and Customer Support</p> <ul style="list-style-type: none"> Income Qualified Programs – CARE, FERA, ESA Medical Baseline 	<p>Financial Assistance Programs</p> <ul style="list-style-type: none"> LIHEAP REACH <p>Complementary Customer Support and Programs</p> <ul style="list-style-type: none"> Medical Baseline ESA Flexible payment arrangements Lifeline, Internet for All 	<p>Financial Assistance and Debt Forgiveness Programs</p> <ul style="list-style-type: none"> AMP LIHEAP REACH <p>Complementary Customer Support and Programs</p> <ul style="list-style-type: none"> Medical Baseline State, Local and Federal Programs referrals 	<p>Convenient Ways to Pay</p> <ul style="list-style-type: none"> Flexible payment arrangements Economic Development Rate (EDR) discount for qualified businesses <p>Other tools and resources</p> <ul style="list-style-type: none"> Find the best Rate Plan option (TOU) On-Bill Financing (OBF) for energy efficiency projects Business Energy Savings Tool – Online Energy Audit
Example ME&O Channels Used	<p>Broad Reach and Awareness: pge.com, social media, paid media, earned media and media relations, bill messages, customer newsletters</p> <p>Targeted Marketing: Direct-to-customer mail and email</p> <p>Community Outreach: Coordinated outreach with Tribal, Local Government, CCA's, and Community Based Organizations</p> <p>Phone-Based Outreach: Outbound calls from Credit Operations and Small Business Advisors from PG&E</p>			

PG&E is using the Access and Functional Needs (AFN) Plan for Public Safety Power Shutoff (PSPS) Support and Community Wildfire Safety Program outreach as models for customer protections transition communications and currently has planned:

- Website translations in **15 non-English languages**
- **Multi-cultural media** engagement
- **Call center support** for non-English speakers (**250+ languages supported** via Language Line)
- **CBO partnerships**, including those that support customers in the **agricultural economy + speak indigenous languages** (Mixteco/Zapoteco)
- Bills, notices, and collateral in **non-standard format** (braille and large print)
- **Proactive outbound calls** to connect customers (**with support for non-English speakers** via Language Line)
- **Bill insert** to inform customers on the end of COVID-19 customer protections and available support **sent in English and Spanish**

Q&A for



*Pacific Gas and
Electric Company*[®]

SCE Timing of Collection Activities

- SCE is currently undergoing its Customer Service Re-Platform (CSRP) implementation with an expected “go live” in early April 2021.
 - Prior to the start of some collections activity SCE will need to make additional adjustments after the system is stabilized
- SCE proposes to not begin its disconnection related activity until August 2, 2021.
 - Residential Customers will receive an additional **69** days before being eligible for disconnection
 - Small Commercial Customers will receive an additional **51** days before being eligible for disconnection.

Activity	Residential Customers	Small Business Customers
Start of collection activities	August 2, 2021	August 2, 2021
Earliest date overdue (15-day) notices are mailed	August 3, 2021	August 3, 2021
Earliest date final call (48-hour) notices are mailed	August 24, 2021	August 10, 2021
Earliest date a customer can be disconnected for non-payment	September 7, 2021	August 20, 2021

SCE Timing of Program Activity

CARE/FERA and MBL Activity

- Recertification for CARE, FERA, and MBL will begin on July 1, 2021
- For any customer that enrolled or reached their re-certification anniversary during the Emergency Customer Protections period, SCE automatically re-certified the customer for the standard length of time.
- Any customer requested to re-certify is given 90 days to provide the requested documented.

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

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

Q&A for



Resumption of Program Recertification Activities

CARE/FERA

- SDG&E's recertification notifications for CARE and FERA will begin July 1. Customers will recertify based on their **existing anniversary dates** and will be categorized into three groups:
 1. Customers with anniversary dates prior to July 1 will not certify until their next anniversary date
 2. Customers with anniversary dates during the first 90 days will be extended an additional 90 days in order to provide time for the full notification cycle
 3. Customers with anniversary dates after the first 90 days will proceed as normal
- Post Enrollment Verification (income verification) will commence July 1, and target a minimum of 3% of new enrollments per D.12-08-044
- High Energy Usage verification begins July 1 for customers that exceed 400% or 600% of baseline
- 24-month rule will be reinstated July 1 – customers who fail to provide requested income documentation or who are otherwise determined to be ineligible for the program will be removed and barred from participation for 24 months.

Medical Baseline

- Same process and customer grouping as CARE/FERA, but with a 60-day notification period
- Customers who enrolled during consumer protections without medical provider certification will be required to provide within one year from their enrollment/anniversary date.
- Starting July 1, new program applications will require medical certification

SDG&E is currently undergoing its Customer Information System (CIS) implementation that will go live on April 5, 2021. Prior to the start of program recertification and verification activity for all programs, SDG&E may need to make additional adjustments after the system is stabilized.

Resumption of Credit & Collection Activities

SDG&E’s collection activity will begin as early as July 2021.

After COVID-19 protections are lifted, Residential & Small Business customers will have **at least 6 weeks** before being eligible for disconnection for non-payment.

Example of Proposed Timeline:

Resumed Activities for Residential Customers

Activity	Earliest Possible Date
Credit Activity – 15-day notice	Early July 2021
Credit Activity – Full credit cycle	Early August 2021
Earliest date a customer can be disconnected	Late August 2021

Resumed Activities for Small Business Customers

Activity	Earliest Possible Date
Credit Activity – 15-day notice	Early July 2021
Credit Activity – Full credit cycle	Early August 2021
Earliest date a customer can be disconnected	Late August 2021
Delayed Payment Charge	Early August 2021
Deposit Review for Commercial Customers	Early September 2021

SDG&E is currently undergoing its Customer Information System (CIS) implementation that will go live on April 5, 2021. Thus, SDG&E may need to make adjustments to the above timing after the system is stabilized. Any adjustments will only result in a delay to the resumption of credit activities/disconnections as described, the dates listed above remain the earliest possible dates for the listed activity.

Q&A for



Timing of Collection Activities

- SoCalGas will begin its collection related activity July 1, 2021.
 - Pre-disconnection letter will be sent to customers on or about May 1, 2021, at least 60 days prior to the issuance of the standard 15-day disconnection notice.

Activity	Residential Customers	Small Business Customers
Pre-Disconnection Collections Letter Issued	May 1, 2021	May 1, 2021
COVID -19 Protections End	June 30, 2021	June 30, 2021
Return to Language Pre-Disconnection Moratorium	June 30, 2021	June 30, 2021
Resume sending Late Payment Notices	July 1, 2021	July 1, 2021
Resume Imposition of Late Payment Charges	N/A	July 1, 2021
Resume 48-hour notice	July 16, 2021	N/A
Issue Courtesy Field Collections Orders	July 26, 2021	July 26, 2021
Resume Field Orders for Service Disconnection	August 30, 2021	August 30, 2021

CARE & MBL Programs Timeline of Activities

- Recertification for CARE and MBL will begin on July 1, 2021.
- Customers who reach their recertification anniversary during the Emergency Customer Protections period, SoCalGas recommends automatically recertifying the customer for an additional year.
- Customers requested to recertify are given 90 days to respond.

Example Scenarios of Customer Recertification Process

Enrollment Date	Auto Recertification During Emergency Customer Protections?	Next Recertification Date ¹
July 1, 2018	Yes	July 1, 2021
July 1, 2019	No	July 1, 2021
July 1, 2020	No. Due to being a new enrollment.	July 1, 2022

¹Example assumes standard 2-year recertification.

Q&A for



APPENDIX



Expanded Timeline and Alignment with R.21-02-014

SCHEDULE AND NEXT STEPS:

2/25/21 – Draft Transition Plans sent to Gillian / LIOB

3/3/21 – Comments for R.21-02-014 Customer Pandemic Debt OIR

3/4/21 – Presentation sent to Gillian / LIOB

3/8/21 – Prehearing Conference

3/11/21 – Quarterly LIOB meeting

3/17/21 – Requested date for LIOB comments

3/26/21 – R.21-02-014 Workshop

4/1/21 – Submission of Transition Plans (Tier 2 AL)

4/30/21 – Expected commencement of outreach regarding end of Emergency
Customer Protections

5/21/21 – R.21-02-014 Proposed Decision

6/24/21 – R.21-02-014 Commission Decision

6/30/21 – Expected End of Emergency Customer Protections





Customer Protections to Prevent/Limit Disconnections

- Residential shall not be disconnected for non-payment:
 - until the utility offers to enroll eligible customers in all applicable benefit programs administered by the utility;
 - until the utility 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;
 - if the customer currently has a Low-Income Home Energy Assistance Program (LIHEAP) pledge pending; or
 - when temperatures above 100 degrees or below 32 degrees are forecasted based on a 72-hour look-ahead period.
- IOUs are not required to make an affirmative inquiry about every residential household and whether they are enrolled in all applicable benefit programs, the 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.
 - After being made aware, residential customers are then given two billing cycles to enroll in the programs
- Disconnection Cap for each IOU (see Appendix 1 of D.20-06-003)
- Arrearage Management Plan (AMP) discussed on next slide

Arrearage Management Plan (AMP)

- December 17, 2020 Approval of large California Energy IOUs (PG&E, SCE, SoCalGas, SDG&E) AMPs by Resolution E-5114.
- February 1, 2021 PG&E, SCE, SoCalGas, SDG&E begin enrolling customers in AMP
Allows for forgiveness of unpaid arrears up to \$8,000 per customer in 1/12 increments in exchange for customer paying current monthly bill on-time.
 - While enrolled in AMP, the customer does not make any payments towards their arrears.
 - Any arrears greater than the \$8,000 threshold are held until customer exits AMP
- Customers who exit AMP with unpaid arrears are still eligible for a 12-month payment plan.
- While enrolled in AMP, any LIHEAP pledges/payments will only be applied to the customer's current and future bill(s) and not to any outstanding arrears.
- Customers are eligible if:
 - Enrolled in CARE or FERA
 - Have been an IOU customer for at least six months at time of enrollment
 - Have total arrears greater or equal to \$500 (\$250 for SoCalGas) that are at least 90 days old
 - Made at least one on-time payment in the past 24-months
 - Cannot be a Net Energy Metering (NEM) or master-metered customers

Approximate AMP Enrollment (As of March 9, 2021)

Utility	 Pacific Gas and Electric Company [™]	 SOUTHERN CALIFORNIA EDISON [®] An EDISON INTERNATIONAL [®] Company	 SDGE A Sempra Energy utility [®]	 SoCalGas A Sempra Energy utility [®]
Number of Customers Enrolled in AMP	7,900	4,400	500	3,200

- Percentage of eligible customers enrolled in AMP is approximately aligned across the large energy IOUs, between 2-4 percent of eligible customers.
- Some customers have elected to not enroll in AMP yet due to the current moratorium on disconnections.

IOU Program Metrics

- IOUs have incorporated some high-level ideas regarding metrics and reporting but are still coordinating to finalize what is expected to be uniform recommendations for metrics.
- Leverage what is included in the monthly reporting in R.18-07-005 for residential customers to limit creating additional reporting and maintain consistency across proceedings
- Examples of metrics being considered:
 - Percentage of customers that complete re-certification for CARE, FERA, and MBL
 - Percentage of customers that complete post-enrollment verification for CARE and FERA programs
 - Number of new enrollments/participation in CARE, FERA, LIHEAP, AMP, MBL
 - Number of customers with payment agreements
- As a reminder, with the expected end of Emergency Customer Protections on June 30, 2021, the IOUs would be entering into the summer months that traditionally resulted in higher customer bills for the electric IOUs
 - As a result, initial trending and data in reporting may show a muted impact as customers have seasonally larger bills/arrears.