ADVICE LETTER SUMMARY

ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Bear Valley Electric Service, Inc (913-E)

Utility type:
- [x] ELC
- [ ] GAS
- [ ] WATER
- [ ] PLC
- [ ] HEAT

Contact Person: Nguyen Quan
Phone #: (909) 394-3600 x664
E-mail: RegulatoryAffairs@bvesinc.com
E-mail Disposition Notice to: RegulatoryAffairs@bvesinc.com

EXPLANATION OF UTILITY TYPE
ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 417-EA

Tier Designation: 2

Subject of AL: BVES Transition Plan for discontinuance of COVID-19 Customer Protections after June 30, 2021 - Resolution M-4849

Keywords (choose from CPUC listing): Compliance

AL Type: [ ] Monthly [ ] Quarterly [ ] Annual [x] One-Time [ ] Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:
Resolution M-4849

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? [ ] Yes [x] No

If yes, specification of confidential information:
Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? [ ] Yes [x] No

Requested effective date: 5/2/21

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed[1]: See Advice Letter

Pending advice letters that revise the same tariff sheets:

[1]Discuss in AL if more space is needed.

Clear Form

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Nguyen Quan
Title: Regulatory Affairs Manager
Utility Name: Bear Valley Electric Service, Inc
Address: 630 E. Foothill Blvd
City: San Dimas State: California
Telephone (xxx) xxx-xxxx: (909) 394-3600 x664
Facsimile (xxx) xxx-xxxx: (909) 394-7427
Email: RegulatoryAffairs@bvesinc.com; nquan@gswater.com

Name: Zeng Zhu
Title: Rate Analyst
Utility Name: Bear Valley Electric Service, Inc
Address: 630 E. Foothill Blvd
City: San Dimas State: California
Telephone (xxx) xxx-xxxx: (909) 394-3600 x495
Facsimile (xxx) xxx-xxxx: (909) 394-7427
Email: RegulatoryAffairs@bvesinc.com; zeng.zhu@bvesinc.com

Clear Form

Bear Valley Electric Service, Inc.
P.O. Box 9028
San Dimas, CA 91773-9028
A Subsidiary of American States Water Company

April 15, 2021

Advice Letter No. 417-EA **(U 913 E)**

California Public Utilities Commission

Bear Valley Electric Service, Inc. ("BVES") hereby transmits for filing the following:

SUBJECT: *BVES Transition Plan for discontinuance of COVID-19 Customer Protections after June 30, 2021 - Resolution M-4849.*

SUPPLEMENT

BVES is supplementing its Advice Letter ("AL") No. 417-E. BVES received notice from Energy Division ("ED") requesting BVES to further elaborate on some requirements of Resolution M-4849. In compliance with this request, BVES revised its COVID-19 customer protections Transition Plan ("the Plan"). BVES also includes its responses to ED request. This supplemental filing replaces Advice Letter No. 417-E in its entirety.

BACKGROUND

On March 4, 2020, California Governor Gavin Newsom declared a State of Emergency ("SOE") for the State of California, in order to combat and minimize the threat of COVID-19.

On March 16, 2020, Governor Newsom issued Executive Order N-28-20[1] ordering the CPUC to monitor any customer service protection measures and policies enacted by public and private utilities in response to COVID-19.

In response to Governor Newsom's orders, on March 17, 2020, CPUC Executive Director Alice Stebbins issued a letter to electric utilities. The letter served as notification that the CPUC intends to monitor and provide emergency customer protection measures for California customers during this emergency.

On April 16, 2020, The Commission issued Resolution M-4842 (see Attachment A) directing utilities to implement customer protections in response to the SOE. As directed, BVES filed Tier 1 AL 385-E and 385-EA establishing its customer COVID-19 protection. The Commission approved BVES AL 385-EA on August 18, 2020.

[1] Executive Order N-28-20, available at: https://www.gov.ca.gov/wp-content/uploads/2020/03/3.16.20-Executive-Order.pdf

RESOLUTION M-4849 TRANSITION PLAN

On February 11, 2021, the Commission adopted Resolution M-4849 extending the Emergency Customer Protections for residential and small business customers through June 30, 2021. Resolution M-4849 directs utilities file a Tier 1 Advice Letter describing all reasonable and necessary actions to extend the Emergency Customer Protections contained in Resolution M-4849 to support California customers through June 30, 2021. On February 16, 2021, BVES filed AL 412-E extending its protections through June 30, 2021.

Resolution M-4849 Ordering Paragraph No. 6 states:

> *6. By February 25, 2021, electric, gas, and water corporations subject to this Resolution shall submit drafts of Transition Plan Advice Letters to CPUC staff (Gillian.Weaver@cpuc.ca.gov), who will share them with the LIOB.*

BVES submitted its draft Transition Plan to the Commission on February 25, 2021.

On March 11, 2021, BVES presented its Transition Plan at the Low-Income Oversight Board ("LIOB") quarterly meeting.

Furthermore, Resolution M-4849 orders BVES to file Tier 2 advice letter detailing its Transition Plan following the recommendations of the Low-Income Oversight Board.

Resolution M-4849 Ordering Paragraph No. 5 states:

> *5. Electric, gas, and water corporations subject to this Resolution shall each file Tier 2 Advice Letter with their transition plans for the expiration of Emergency Customer Protections by April 1, 2021. The transition plans shall include 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 accounts for compliance and safety, and 4) a progress tracking and reporting plan. 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, to effectively ease customers though a transition off of Emergency Customer Protections. Electric and gas corporations shall serve copies of the Advice Letters to 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 proceeding service lists. Water corporations shall serve copies of the Advice Letters to R.18-03-011 and R.17-06-024 proceeding service lists.*

On March 22, 2021, Energy Division provided recommendations to BVES's plan. On March 24, 2021, the LIOB provided recommendations to BVES's plan. BVES reviewed Energy Division and LIOB's recommendations. BVES addresses the recommendations from both Energy Division and LIOB in this advice letter, and incorporated recommendations into its Plan where applicable.

See attachment C for BVES Transition Plan

RECOMMENDATIONS FROM THE COMMISSION

After review of BVES's draft Transition Plan, Energy Division proposed recommendations to BVES.

1. Report number of customers that participate in a payment plan that are 6-month or longer. According to the LIOB presentation, all SMJUs will offer customers payment arrangements from 6 months up to 12 months.

   Response: See section V. of BVES's Transition Plan.

2. If applicable, please discuss data exchange of low-income customers with water utilities, as directed in Resolution M-4849

   Response: See section III.E of BVES's Transition Plan. BVES has conducted routine data exchange of low-income customers with other utilities, such as Southwest Gas. BVES will reach out to the City of Big Bear Lake Department of Water and Power to inquire about data sharing process.

3. Discuss leveraging CBOs and/or LIHEAP service providers for outreach

   Response: See section III.E of BVES's Transition Plan.

RECOMMENDATIONS FROM LOW-INCOME OVERSIGHT BOARD

After review of BVES's draft transition plan, the LIOB proposed recommendations to BVES.

1. Extreme Climate Protections

   Response: BVES has an existing policy on this matter. Pursuant to BVES company policy, BVES does not disconnect customers when temperature is below 32 degree Fahrenheit. In addition, BVES has an existing Emergency Disaster Plan required by D.19-07-015. However, LIOB acknowledges this recommendation is outside the scope of Resolution M-4849.

2. Increase CARE Subsidies for the Most Vulnerable to 50% as Part of AMP

   Response: BVES's CARE program is evaluated and approved in a separate Commission proceeding. BVES believes this recommendation is outside the scope of this proceeding.

3. CARE Data Sharing for Water Utilities

   Response: See section III.E of BVES's Transition Plan. BVES has conducted routine data exchange of low-income customers with Southwest Gas, which also serves BVES

customers. BVES will reach out to the City of Big Bear Lake Department of Water and Power to inquire about data sharing process.

4. Marketing and Outreach

   Response: BVES does not have tribal lands or tribal communities, or customers considered disadvantaged/underserved or hard-to-reach in its service territory. Furthermore, Resolutions M-4842 and M-4849 already provide BVES flexibility in its spending. BVES is authorized to record incremental costs in its COVID-19 Pandemic Protection Memorandum Account.

5. Define and Measure Success

   Response: See section V. of BVES's transition plan.

6. Aliso Canyon Best Practices

   Response: BVES's ESA program is evaluated and approved by the Commission in a separate proceeding. BVES believes this recommendation is outside the scope of this proceeding.

7. Coordination with LIHEAP

   Response: See section III.E of BVES's Transition Plan. BVES is amiable to data sharing with other stakeholders such as the Low Income Home Energy Assistance Program ("LIHEAP"). However, the LIHEAP program is a federally funded program via grants to local governments that may have restrictions for data sharing. BVES believes that the Commission should address the coordination with LIHEAP in a separate proceeding.

8. Referral to Weatherization and Other Programs as Part of AMP.

   Response: See section II.E of BVES's Transition Plan. When assisting customers, BVES will identify and refer customers to other program the customer may qualify for.

ENERGY DIVISION REQUEST FOR SUPPLEMENTAL FILING

On April 4, 2021, BVES received from ED email requesting BVES file supplement to its AL 417-E. In the email, ED analyst raise two deficiencies.

1. Report requested arrearage data for the entire geographic region (p.14-15)

   Response: See Table 5 in section IV.B of BVES's Transition Plan. Data shown in Tables 1 through 5 are for BVES's entire service area. BVES has a small service area with approximately 25,000 total customers.

2. IOUs should also include information on any federal relief funds that are or may become available to assist customers in paying their utility bills (p.30).

   Response: See section II.E of BVES's Transition Plan. As stated in Resolution M-4849, "IOUs do not have a direct role in supporting customer access to other non-utility federal funds". However, BVES will attempt inform customers of any relevant assistance that may be helpful as they become available. These may include but not limited to utility programs such as the CARE program, payment plan options, Commission directed arrearage management plans, as well as state and federal assistance programs.

BVES revised its Transition Plan after consideration of these deficiencies.

See attachment C for BVES's Transition Plan.

COMPLIANCE

This advice letter requests approval in compliance with Resolution M-4849.

ATTACHMENT

Attachment A: Resolution M-4842
Attachment B: Resolution M-4849
Attachment C: COVID-19 EMERGENCY CUSTOMER PROTECTIONS TRANSITION PLAN

TIER DESIGNATION

This advice letter is submitted with a Tier 2 designation.

EFFECTIVE DATE

BVES respectfully requests this advice letter becomes effective on May 2, 2021.

NOTICE AND PROTESTS

A protest is a document objecting to the granting in whole or in part of the authority sought in this advice letter. A response is a document that does not object to the authority sought, but nevertheless presents information that the party tendering the response believes would be useful to the CPUC in acting on the request.

A protest must be mailed within 20 days of the date the CPUC accepts the advice letter for filing. The Calendar is available on the CPUC's website at www.cpuc.ca.gov.

A protest must state the facts constituting the grounds for the protest, the effect that approval of the advice letter might have on the protestant, and the reasons the protestant believes the advice letter, or a part of it, is not justified. If the protest requests an evidentiary hearing, the protest must state the facts the protestant would present at an evidentiary hearing to support its request for whole or partial denial of the advice letter.

The utility must respond to a protest within five days.

All protests and responses should be sent to:
California Public Utilities Commission, Energy Division
ATTN: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 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).

Copies of any such protests should be sent to this utility at:

Bear Valley Electric Service, Inc.
ATTN: Nguyen Quan
630 East Foothill Blvd.
San Dimas, CA 91773
Fax: 909-394-7427
E-mail: RegulatoryAffairs@bvesinc.com

If you have not received a reply to your protest within 10 business days, contact Nguyen Quan at (909) 394-3600 ext. 664.

Correspondence:
Any correspondence regarding this compliance filing should be sent by regular mail or e-mail to the attention of:

Nguyen Quan
Manager, Regulatory Affairs
Bear Valley Electric Service, Inc.
630 East Foothill Blvd.
San Dimas, California 91773
Email: RegulatoryAffairs@bvesinc.com

The protest shall set forth the grounds upon which it is based and shall be submitted expeditiously. There is no restriction on who may file a protest.

Sincerely,

/s/Zeng Zhu
Zeng Zhu
Rate Analyst, Regulatory Affairs

cc: Edward Randolph, Deputy Executive Director, Energy Division
Franz Cheng, Energy Division
R. Mark Pocta, California Public Advocates Office
BVES General Order 96-B Service List

BEAR VALLEY ELECTRIC SERVICE, INC.

G.O. 96-B
SERVICE LIST

AGNES ROBERTS, FINANCIAL ANALYST
AGNES.ROBERTS@BBCCSD.ORG
EMAIL ONLY

CITY CLERK
CITY OF BIG BEAR LAKE
39707 BIG BEAR BLVD.
P.O. BOX 10000
BIG BEAR LAKE, CA 92315

CITY ATTORNEY
CITY OF BIG BEAR LAKE
39707 BIG BEAR BLVD.
P.O. BOX 10000
BIG BEAR LAKE, CA 92315

COUNTY CLERK
COUNTY OF SAN BERNARDINO
385 N. ARROWHEAD AVENUE – 2ND FLOOR
SAN BERNARDINO, CA 92415-0140

COUNTY COUNSEL
COUNTY OF SAN BERNARDINO
385 N. ARROWHEAD AVENUE – 4TH FLOOR
SAN BERNARDINO, CA 92415-0140

HERSCHEL T. ELKINS
ASST ATTORNEY GENERAL
OFFICE OF THE ATTORNEY GENERAL
STATE OF CALIFORNIA
300 SOUTH SPRING STREET
LOS ANGELES, CA 90013

ERIC JANSSEN
ELLISON, SCHNEIDER & HARRIS LLP
2600 CAPITOL AVE., STE. 400
SACRAMENTO, CA 95816-5905
ERICJ@ESLAWFIRM.COM

WADE REESER, VP, OPERATIONS
BIG BEAR MOUNTAIN RESORTS
P.O. BOX 77, 880 SUMMIT BLVD.
BIG BEAR LAKE CA 92315
WREESER@MAMMOTHRESORTS.COM

PETER EICHLER
LIBERTY UTILITIES
2865 BRISTOL CIRCLE
OAKVILLE, ONTARIO L6H 7H7
PETER.EICHLER@LIBERTYUTILITIES.COM

MIKE LONG
CALIFORNIA PACIFIC ELECTRIC CO., LLC
933 ELOISE AVENUE
SOUTH LAKE TAHOE, CA 96150
MIKE.LONG@LIBERTY-ENERGY.COM

RANDLE COMMUNICATIONS
500 CAPITOL MALL, SUITE 1950
SACRAMENTO, CA 95814
MCARDONA@RANDLECOMMUNICATIONS.COM
MGAZDA@RANDLECOMMUNICATIONS.COM

MEGAN SOMOGYI
GOODIN, MACBRIDE, SQUERI & DAY, LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
MSOMOGY@GOODINMACBRIDE.COM

FRED YANNEY, YANNEY LAW OFFICE
17409 MARQUARDT AVENUE, UNIT C-4
CERRITOS, CA 90703
FREDYANNEY@GMAIL.COM

BRENT TREGASKIS
BEAR MOUNTAIN RESORT
P O BOX 77
BIG BEAR LAKE, CA 92315

SOUTHERN CALIFORNIA EDISON CO.
P. O. BOX 800
ROSEMEAD, CA 91770

PATRICK O'REILLY
OPR COMMUNICATIONS
19318 JESSE LANE, SUITE 200
RIVERSIDE, CA 92508
POREILLY@OPRUSA.COM

ARLENE HERRERA
OPR COMMUNICATIONS
19318 JESSE LANE, SUITE 200
RIVERSIDE, CA 92508
AHERRERA@OPRUSA.COM

NAVAL FACILITIES ENGINEERING COMMAND
REA. D. ESTRELLA
SOUTHWEST DIVISIONM
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132
REA.ESTRELLA@NAVY.MIL

LIBERTY UTILITIES
9750 WASHBURN ROAD
DOWNEY, CA 90241
AdviceLetterService@libertyutilities.com

ATTACHMENT A

Resolution M-4842

Date of Issuance
April 17, 2020

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

EXECUTIVE DIVISION

San Francisco, California
Date: April 16, 2020
Resolution M-4842

R E S O L U T I O N

EMERGENCY AUTHORIZATION AND ORDER DIRECTING UTILITIES TO IMPLEMENT EMERGENCY CUSTOMER PROTECTIONS TO SUPPORT CALIFORNIA CUSTOMERS DURING THE COVID-19 PANDEMIC

SUMMARY

The Commission issues this Resolution on its own motion in response to Governor Gavin Newsom's declaration of a state of emergency and issuance of executive orders due to the novel coronavirus (COVID-19) pandemic. This Resolution ratifies directions provided by the Commission's Executive Director on March 17, 2020 to energy, water and communications corporations to retroactively apply customer protection measures from March 4, 2020 onward – during the pendency of the COVID-19 pandemic.[1]

Specifically, this Resolution orders electric, gas, communications, and water and sewer corporations in California to file a Tier 2 Advice Letter describing all reasonable and necessary actions to implement the Emergency Customer Protections contained in this resolution to support California customers; and authorizes the electric, gas, communications, and water and sewer corporations to establish memorandum accounts to track incremental costs associated with complying with this resolution. The Emergency Customer Protections apply to customers for up to one year from the date of this resolution.

---

[1] https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2020/Exec%20Director%20Letter%20to%20Energy%20Companies%20re%20COVID19%20March%2017,%202020.pdf; https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2020/Exec%20Director%20Letter%20to%20Water%20Companies%20re%20COVID-19%20March%2017,%202020.pdf https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2020/Exec%20Director%20Letter%20to%20Communications%20Companies%20re%20COVID-19%20March%2017,%202020.pdf

BACKGROUND

On March 4, 2020, Governor Newsom declared a State of Emergency in California related to COVID-19; there were 53 known cases of COVID-19 in California, and officials expected the number of cases to increase.[2]

The Governor has taken additional actions, including:

- Issuing a new Executive Order[3] recognizing that individuals exposed to COVID-19 may be unable to report to work due to illness or quarantines, and ordering numerous measures including social distancing;
- Issuing an Executive Order[4] requesting that the Commission monitor the measures undertaken by public and private utility providers to implement customer service protections in response to COVID-19;
- Issuing a statewide shelter-in-place order directing Californians to remain in their homes except to meet essential needs;[5] and
- Deploying the California National Guard to assist California's food banks, which have been affected by a drop in volunteers and a disruption to the food distribution infrastructure.[6]

By April 1, 2020, the number of confirmed COVID-19 cases in California had risen to 9,191, with 203 deaths.[7] The situation is rapidly evolving, and the number of confirmed cases is predicted to continue rising.

Some companies have already implemented emergency protections in response to the COVID-19 pandemic, including but not limited to:

---

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

[3] Executive Order N-25-20, available at https://www.gov.ca.gov/wpcontent/uploads/2020/03/3.12.20-EO-N-25-20-COVID-19.pdf

[4] Executive Order N-28-20, available at https://www.gov.ca.gov/wp-content/uploads/2020/03/3.16.20-Executive-Order.pdf

[5] https://covid19.ca.gov/stay-home-except-for-essential-needs/

[6] https://www.gov.ca.gov/2020/03/20/governor-newsom-deploys-california-national-guard-to-help-distribute-food-at-food-banks-protect-californias-most-vulnerable/

[7] https://www.cdph.ca.gov/covid19

- Observing a moratorium on electric and gas service disconnections for nonpayment and waiving late fees;[8]
- Signing the Federal Communications Commission's Keep Americans Connected Pledge to open wi-fi hotspots and observe a moratorium on internet service disconnections for nonpayment;[9]
- Boosting broadband speeds and lifting data caps.[10]

The Commission takes specific action in this Resolution, in response to the Governor's emergency proclamation and executive orders, to provide continuity and consistency between all utility actions resulting from the COVID-19 pandemic.

DISCUSSION

The response to COVID-19 has been extremely disruptive to all Californians and has impacted many Californians' ability to work. The Commission has dealt with highly disruptive events, most recently with the devastating wildfires in Northern and Southern California. In response to reoccurring natural and manmade disasters, the Commission initiated a disaster relief Rulemaking ((R.) 18-03-011) and adopted a series of requirements for utility companies (electric, gas, water and sewer) and communications providers, culminating in customer protection measures adopted in decisions (D.)19-07-015 and D.19-08-025.

The customer protection measures adopted in R.18-03-011 apply in cases where a gubernatorial or presidential declared emergency relates to the disruption or degradation of service. The COVID-19 pandemic represents a different type of emergency, one where the threat --in this case, a virus-- necessitates a response which impacts Californians' ability to pay for utility service. Social distancing and shelter-in-place requirements have required the closure of non-essential businesses including bars, dine-in restaurants, and shops, and subsequent employee layoffs have created a risk that customers may fall behind on utility payments due to the COVID-19 pandemic at the same time that shelter in place orders will likely cause increased usage of utility services resulting in higher utility bills.

[8] https://www.pge.com/en_US/about-pge/company-information/protective-protocols/covid19.page?WT.mc_id=Vanity_covid19; https://www.sce.com/safety/coronavirus; https://www.sdge.com/coronavirus

[9] https://www.fcc.gov/keep-americans-connected

[10] https://www.consumerreports.org/internet-providers/isps-respond-to-coronavirus-raise-speeds-suspend-data-caps-keep-america-connected-pledge/

Having access to essential utility services is critical to maintaining Californians' health and safety during the COVID-19 pandemic. Therefore, due to the COVID-19 pandemic, the Commission extends to California customers the emergency customer protections from D.19-07-015 and D.19-08-025, through April 16, 2021, with an option to extend. The Commission takes this action in response to extraordinary circumstances and the state of emergency to ensure continuity of essential service to customers during this health and safety crisis. This Resolution does not establish precedent for standard Commission ratemaking or customer protection processes.

All residential and small business customers in California are eligible for the emergency customer protections set forth in this Resolution.

These customer protections are a floor, not a ceiling.[11] As we stated in D.19-07-015 and D.19-08-025, we support and encourage the utilities and communications service providers to do more to help Californians in this time of need.[12] The utilities and communications service providers have the discretion to add additional customer relief efforts that are unique to their customers' experience, or the specific type of damage a customer may suffer from as a result of COVID-19.[13] In addition, we acknowledge that some of the provisions adopted in D.19-07-015 and D.19-08-025 in response to disasters such as earthquakes and wildfires may not apply in the case of a pandemic; for example, the requirement that electric and gas utilities identify the premises of affected customers whose utility service has been disrupted or degraded and discontinue billing these premises without assessing a disconnection charge. If the electric, gas, communication, and water corporations subject to this Resolution believe that specific provisions from D.19-07-015 and D.19-08-025 do not apply during the pandemic, they shall identify such provisions in their Advice Letters and provide a justification for why they believe the provisions do not apply.

Emergency Customer Protections for Electric and Gas Utility Customers

The electric and gas utilities under this Commission's jurisdiction subject to this Resolution are the following: (1) Pacific Gas & Electric Company; (2) Southern California Edison Company; (3) San Diego Gas and Electric Company; (4) Southern California Gas Company; (5) PacifiCorp; (6) Liberty Utilities (CalPECO Electric) LLC; (7) Bear Valley Electric Service (a division of Golden State Water Company); (8) Southwest Gas Corporation; (9) Alpine Natural Gas, Inc.; (10) West Coast Gas Company, Inc.; and (11) Catalina Island Gas Services.

[11] D.19-07-015 at 24-25; *see also* D.19-08-025 at 34.

[12] *Id.*

[13] *Id.*

The electric and gas utilities subject to this Resolution shall take the following immediate actions and file a Tier 2 Advice Letter no later than 15 days after this Resolution's approval demonstrating compliance to the Commission's Energy Division:[14]

(1) waive deposit requirements for residential customers seeking to reestablish service for one year and expedite move in and move out service requests;

(2) stop estimated usage for billing attributed to the time period when a home/unit was unoccupied as a result of the emergency;

(3) identify the premises of affected customers whose utility service has been disrupted or degraded, and discontinue billing these premises without assessing a disconnection charge;

(4) prorate any monthly access charge or minimum charges;

(5) implement payment plan options for residential customers;

(6) suspend disconnection for nonpayment and associated fees, waive deposit and late fee requirements for residential customers;

(7) support low-income residential customers by: (a) freezing all standard and high-usage reviews for the California Alternate Rates for Energy (CARE) program eligibility for 12 months and potentially longer, as warranted; (b) contacting all community outreach contractors, the community based organizations who assist in enrolling hard-to-reach low-income customers into CARE, to help better inform customers of these eligibility changes; (c) partnering with the program administrator of the customer funded emergency assistance program for low-income customers and increase the assistance limit amount for the next 12 months; and (e) indicate how the energy savings assistance program can be deployed to assist customers;

(8) suspend all CARE and FERA program removals to avoid unintentional loss of the discounted rate during the period for which the customer is protected under these customer protections;

(9) discontinue generating all recertification and verification requests that require customers to provide their current income information;

(10) offer repair processing and timing assistance and timely access to utility customers pursuant to Section 8386(c)(18);

[14] D.19-07-015 at 21-24.

(11) include these customer protections as part of their larger community outreach and public awareness plans under Section 8386(c)(16)(b);

(12) meet and confer with the Community Choice Aggregators as early as possible to discuss their roles and responsibilities for each emergency customer protection.

To the extent that they have not already done so in response to the Executive Director's March 17, 2020 letter, or to the extent to which their response was not fully responsive to the requirements of this Resolution, we direct electric and gas utilities subject to this Resolution to file Tier 2 compliance Advice Letters with the Commission's Energy Division to implement the ordering paragraphs of this resolution and modify their tariffs as necessary.

In order to allow for recovery of expenses reasonably incurred while complying with this Resolution, electric and gas utilities subject to this Resolution shall each establish a COVID-19 Pandemic Protections Memorandum Account (CPPMA), to book only those costs associated with protections ordered by this Resolution. The recorded costs must meet the following conditions: (1) those ordered by this Resolution; and (2) incurred starting with the date of the Governor's emergency declaration - March 4, 2020. The review of these costs for possible collection in rates will be conducted in a General Rate Case, a Biennial or Triennial (as applicable) Cost Allocation Proceeding, the Energy Resource Recovery Account, or another proceeding. This affords Commission staff an opportunity to review any incremental expense associated with this Resolution.

Finally, in order to provide immediate assistance and customer protections, electric and gas utilities subject to this Resolution must act with expediency in filing their Advice Letters, must request expedited Advice Letter treatment pursuant to the Commission's General Order (GO) 96-B, must request a waiver or a shortened protest and reply period of five days, and must include in their Advice Letters: (1) a communication plan to convey the availability of these protections to customers; and (2) preliminary statement tariff language for the new CPPMA.

Emergency Customer Protections for Water Customers

The water and sewer corporations under this Commission's jurisdiction subject to this Resolution are the following: all Class-A water utilities (California Water Service Company, California American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities (Apple Valley Ranchos Water, and Park Water), San Jose Water Company, San Gabriel Valley Water Company, and Suburban Water Systems; and all Class-B water utilities (Bakman Water Company, Del Oro Water Company, East Pasadena Water Company, and Alco Water Service).

The water and sewer corporations subject to this Resolution shall take the following immediate actions. To the extent that they have not already done so in response to the Executive Director's March 17, 2020 letter, or to the extent to which their response was not fully responsive to the requirements of this Resolution, the water and sewer corporations subject to this Resolution shall file a Tier 2 Advice Letter no later than 15 days after this Resolution's approval demonstrating compliance to the Commission's Water Division:[15]

(1) activation of their Catastrophic Event Memorandum Account (CEMA) effective to the date of the Governor's declaration of a state of emergency - March 4, 2020;

(2) make insurance claims on all costs and expenses incurred as a result of the pandemic, and credit insurance payments to their CEMA;

(3) work cooperatively with affected customers to resolve unpaid bills, and minimize disconnections for non-payment;

(4) waive reconnection or facilities fees for customers and suspend deposits for customers who must reconnect to the system;

(5) provide reasonable payment options to customers;

(6) waive bills for victims who lost their homes or if their homes are rendered uninhabitable; and

(7) authorize a pro rata waiver of any fixed element of a water bill for the time that the home is uninhabitable, even if the reason for it being uninhabitable is not loss of water service.

Emergency Customer Protections for Communications Customers

The emergency customer protections established in D.19-08-025 ensure that residential and small business communications service customers who experience a housing or financial crisis due to a disaster keep vital services and receive support in the wake of the disaster.

The customer protections for facilities based and non-facilities-based landline providers (*e.g.*, 9-1-1/E9-1-1 providers, LifeLine providers, VoIP providers, COLRs, and other landline providers) are:[16]

[15] *Id.* at 42-43.

[16] D.19-08-025 at 31-33.

(1) Waiver of one-time activation fee for establishing remote call forwarding, remote access to call forwarding, call forwarding features and messaging services;

(2) Waiver of the monthly rate for one month for remote call forwarding, remote access to call forwarding, call forwarding, call forwarding features, and messaging services;

(3) Waiver of the service charge for installation of service at the temporary or new permanent location of the customer and again when the customer moves back to the premises;

(4) Waiver of the fee for one jack and associated wiring at the temporary location regardless of whether the customer has an Inside Wire Plan;

(5) Waiver of the fee for up to five free jacks and associated wiring for Inside Wiring Plan customer upon their return to their permanent location;

(6) Waiver of the fee for one jack and associated wiring for non-Plan customers upon their return to their permanent location;

Decision 19-08-025 describes the customer protections for wireless providers (e.g., those that provide access to E9-1-1 and/or Lifeline services) as follows. Items 1-6 apply to facilities-based wireless providers, and items 4-8 apply to resellers and non-facilities-based wireless providers, (*e.g.* mobile virtual network operators [MVNOs]):[17]

(1) Deploy mobile equipment, including Cells on Wheels and Cells on Light Trucks, to supplement service in areas that need additional capacity to ensure access to 9-1-1/E9-1-1 service;

(2) Provide device charging stations in areas where impacted wireless customers seek refuge; and

(3) Provide WiFi access in areas where impacted wireless customers seek refuge.

The following are directed to all facilities-based and non-facilities based wireless providers, including resellers:[18]

[17] *Id.* at 33.

[18] *Id.* at 34.

(4) Provide mobile phones for customers seeking shelter from a disaster to use temporarily at a county or city designated shelter.

(5) The Commission urges wireless carriers to allow customers to defer or phase payment for coverage charges for data, talk, and text for defined periods of time;

(6) The Commission urges wireless carriers to extend payment dates for service for defined periods of time;

(7) Consider providing temporary replacement phones for customers whose phones were lost or damaged as a result of a disaster or evacuation.

(8) Consider providing temporary replacement phones for customers whose phones were lost or damaged as a result of a disaster or evacuation.

Decision 19-08-025 incorporates the interim emergency protections applicable to LifeLine service adopted in D.18-08-004,[19] which are in effect during the COVID-19 state of emergency for all providers of LifeLine service:[20]

(1) Delay the California LifeLine Renewal Process and suspend the de-enrollment for non-usage rules; and

(2) Implement the LifeLine outreach methods.

To the extent that they have not already done so in response to the Executive Director's March 17, 2020 letter, or to the extent to which their response was not fully responsive to the requirements of this Resolution, communications corporations subject to this Resolution shall file an Advice Letter no later than 15 days after this Resolution's approval demonstrating compliance to the Commission's Communications Division.

Community Awareness and Public Outreach of Customer Protection Implementation during COVID-19

In D.19-07-015 and D.19-08-025, we directed the utilities and communications service providers to raise awareness about the existence of the emergency customer protections

[19] D.18-08-004 at 9.

[20] Nothing in this Resolution supersedes other customer protections which may be ordered by the Commission. For example, the March 19, 2020 Assigned Commissioner Ruling (ACR) in R.20-02-008 suspended the LifeLine renewal process, including de-enrollment due to the renewal process, for all California LifeLine participants including those who do not meet federal LifeLine eligibility criteria for a period of 90 days from the date of the ACR unless modified by a Commission decision. (R.20-02-008 ACR at 3.)

before, during, and after a disaster so customers are prepared. In these decisions, we established a baseline set of required outreach and education activities to ensure ratepayers have robust awareness about the Commission's customer protections.[21] Then in D.20-03-004 we adopted further in-language community outreach awareness and public outreach requirements before, during and after a wildfire for our regulated, investor-owned electrical utilities.[22]

For meaningful public impact during this COVID-19 crisis, we direct the utilities and communications service providers to conduct outreach of these protections to customers. Outreach and public awareness should be consistent with D.19-07-015, D.19-08-025, and D.20-03-004 regarding the type of service the various utilities and communications service providers offer.[23] The utilities and communications service providers have flexibility in how they deliver messages about the customer protections ordered in D.19-07-015, D.19-08-025 and in the languages ordered in D.20-03-004 as long as the messages are designed to reach customers to the maximum extent and aid them in their understanding of these customer protections.

General Compliance with other State Statutes and Applicable Regulations

The electric, gas, communications, and water and sewer corporations subject to this Resolution are directed to ensure compliance with existing statutes, regulations, ordinances and work in cooperation with all appropriate California, federal, and local government agencies.

COMMENTS

Public Utilities Code section 311(g)(1) provides that this Resolution must be served on all parties and subject to at least 30 days public review and comment prior to a vote of the Commission. Section 311(g)(2) provides that this 30-day period may be reduced or waived "in an unforeseen emergency … ." The Commission's Rules of Practice and Procedure also provide that public review and comment may be waived or reduced in an "unforeseen emergency situation" specifically where there are "[a]ctivities that severely impair or threaten to severely impair public health or safety…" (Rule 14.6(a)(1) and/or where there are "[c]rippling disasters that severely impair public health or safety." (Rule 14.6(a)(2)). "Requests for relief based on extraordinary conditions in which time is of the

[21] D.19-07-015 at 35-37; *see also* D.19-08-025 at 39-42.

[22] D.20-03-004 at 19-25.

[23] The requirements In D.19-08-025 apply to the communications service providers. The requirements in D.19-07-015 and D.20-03-004 apply to the electrical corporations. The requirements of D.19-07-015 apply to the natural gas and Class A and Class B water corporations.

essence." (Rule 14.6(a)(2)). "Unusual matters that cannot be disposed of by normal procedures if the duties of the Commission are to be fulfilled."

The 30-day comment period is waived pursuant to these authorities due to the extraordinary nature of the pandemic. In order to better disseminate the directives in this resolution it was served on the service list of the proceeding that developed the customer protection measures discussed herein - R.18-03-011. Interested persons can participate in the forthcoming Advice Letter processes.

FINDINGS

1. On March 4, 2020, Governor Newsom declared a State of Emergency in California related to COVID-19.

2. On March 19, 2020, Governor Newsom ordered Californians to shelter in place except to meet essential needs.

3. Social distancing and shelter-in-place requirements have required the closure of non-essential businesses and resulted in layoffs.

4. Employee layoffs due to the COVID-19 pandemic have created a risk that residential customers may fall behind on utility payments through no fault of their own.

5. Some companies have already implemented customer protections in response to the COVID-19 pandemic, including observing moratoria on disconnections for nonpayment and lifting broadband data caps.

6. In order to assist Californians affected by the COVID-19 pandemic, it is reasonable to provide continuity and consistency between all utility actions related to the pandemic.

7. The Commission has previously issued Resolutions and opened Rulemakings to address highly disruptive events, most recently in response the devastating wildfires in Northern and Southern California.

8. In response to the reoccurring natural and manmade disasters, the Commission opened Rulemaking (R.) 18-03-011 and adopted customer protection measures adopted in decisions (D.)19-07-015 and D.19-08-025.

9. Having access to essential utility services is critical to maintaining Californians' health and safety during the COVID-19 pandemic.

10. In order to expeditiously assist Californians affected by the COVID-19 pandemic, it is reasonable to apply the emergency customer protections adopted in D.19-07-015 and D.19-08-025 during the pendency of the pandemic.

11. Public Utilities Code section 311(g)(2) allows the Commission to reduce or waive the public review and comment period in an unforeseen emergency.

THEREFORE, IT IS ORDERED that:

1. Electric, gas, communications, and water and sewer corporations subject to this Resolution shall retroactively apply the customer protection measures adopted in D.19-07-015 and D.19-08-025 from March 4, 2020 onward.

2. To the extent that they have not already done so in response to the Executive Director's March 17, 2020 letter, or to the extent to which their response was not fully responsive to the requirements of this Resolution, electric, gas, communications, and water and sewer corporations subject to this Resolution shall file a Tier 2 Advice Letter describing all reasonable and necessary actions to implement the emergency customer protections adopted in D.19-07-015 and D.19-08-025 to support California customers.

3. Commission staff will review the Advice Letters for compliance with the customer protection measures adopted in D.19-07-015 and D.19-08-025.

4. In the Tier 2 Advice Letter required in Ordering Paragraph #2, rate regulated electric, gas, communications, and water and sewer corporations subject to this Resolution may request authorization to track and recover incremental costs associated with complying with this resolution.

5. The Emergency Customer Protections apply to residential and small business customers for up to one year from the date of this Resolution, with the option to extend.

6. The electric, gas, communications, and water and sewer corporations subject to this resolution shall conduct community awareness and public outreach of the customer protection measures adopted in D.19-07-015 and D.19-08-025 consistent with the requirements of D.19-07-015, D.19-08-025, and D.20-03-004.[24]

7. This order is effective today.

[24] The requirements In D.19-08-025 apply to the communications service providers. The requirements in D.19-07-015 and D.20-03-004 apply to the electrical corporations. The requirements of D.19-07-015 apply to the natural gas and Class A and Class B water corporations.

I certify that the foregoing resolution was adopted by the California Public Utilities Commission at its regular meeting of April 16, 2020, and the following Commissioners approved favorably thereon:

/s/ ALICE STEBBINS

Alice Stebbins
Executive Director

MARYBEL BATJER
President
LIANE M. RANDOLPH
MARTHA GUZMAN ACEVES
CLIFFORD RECHTSCHAFFEN
GENEVIEVE SHIROMA
Commissioners

ATTACHMENT B

Resolution M-4849

Date of Issuance
February 12, 2021

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Executive Division

Date: February 11, 2021
Resolution M-4849

R E S O L U T I O N

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

SUMMARY

The Commission issues this Resolution on its own motion in response to Governor Gavin Newsom's declaration of a state of emergency and issuance of executive orders due to the novel coronavirus (COVID-19) pandemic. On April 17, 2020, the Commission issued Resolution M-4842, which ratified directions provided by the Commission's Executive Director on March 17, 2020[1] to energy, water, and communications corporations to retroactively apply customer protection measures from March 4, 2020 onward during the pendency of the COVID-19 pandemic, for up to one year with an option to extend.[2]

This Resolution extends the Emergency Customer Protections for residential and small business customers through June 30, 2021, and the Commission reserves an option to extend further. Additionally, electric, gas, communications, and water corporations shall file a Tier 1 Advice Letter describing all reasonable and necessary actions to extend the Emergency Customer Protections contained in this Resolution to support California customers through June 30, 2021, and the electric, gas, and water corporations shall extend the memorandum accounts established pursuant to Resolution M-4842 to track incremental costs associated with complying with this Resolution.

[1] March 17, 2020 Executive Director Letter to Energy Companies Regarding COVID-19; Executive Director Letter to Water Companies Regarding COVID-19; Executive Director Letter to Communications Companies Regarding COVID-19 all available at https://www.cpuc.ca.gov/covid/

[2] https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2020/Final%20Resolution%20M-4842.pdf

In addition, electric, gas, and water corporations in California shall file a Tier 2 Advice Letter containing their transition plans associated with discontinuance of the Emergency Customer Protections after June 30, 2021. The goal of the transition plan is to effectively 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. As described more fully below, these transition plans shall include 1) a timeline of new 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.

BACKGROUND

On March 4, 2020, when Governor Newsom declared a State of Emergency related to COVID-19, there were 53 known cases of COVID-19 in California.[3] As of February 3, 2021, there were 3,294,447 cases of COVID-19 in California, and 42,466 deaths.[4]

On March 19, 2020, Governor Newsom ordered Californians to shelter in place except to meet essential needs.[5] On August 22, 2020, the State released the Blueprint for a Safer Economy[6] to permit gradual reopening of certain businesses and activities, but due to increases in California's COVID-19 caseload many business remained closed or were open with limited capacity. Restrictions were modified over the ensuing months in response to changes in California's COVID-19 caseload and intensive care unit utilization, and the most recent regional stay at home order and overnight curfew were lifted on January 25, 2021.[7]

It is uncontroverted that as of February 4, 2021, 54 counties, representing 99.9 percent of California's population, were still in the most restrictive tier of California's reopening roadmap.[8]

---

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

[4] https://covid19.ca.gov/

[5] Executive Order N-33-20, available at https://www.gov.ca.gov/2020/03/19/governor-gavin-newsom-issues-stay-at-home-order/ On April 2, 2020, the Governor also issued Executive Order N-42-20 to prohibit water utilities from disconnecting water service:

https://www.gov.ca.gov/2020/04/02/governor-newsom-issues-executive-order-protecting-homes-small-businesses-from-water-shutoffs/

[6] https://covid19.ca.gov/safer-economy/

[7] https://covid19.ca.gov/stay-home-except-for-essential-needs/#stay-home-order

[8] https://covid19.ca.gov/safer-economy/

In April and May 2020, California's unemployment rate hit 16.4 percent due to COVID-19 pandemic-related job loss. Although the unemployment rate fell to 9.0 percent in December 2020, California's unemployment rate in March 2020 was only 5.5 percent, and California has only recovered 44 percent of the nonfarm jobs lost due to the COVID-19 pandemic during March and April 2020.[9] With 99.9 percent of California's population in the most restrictive reopening tier, California's economy is still months away from recovery.

While a new federal pandemic relief package was signed into law on December 27, 2020, the stimulus checks and federal unemployment benefit enhancement are half the amount provided in the prior CARES Act, and unemployment recipients may only receive 10 weeks of the federal benefit enhancement instead of 11.[10] The scope and level of further federal and state support is uncertain.

Multiple COVID-19 vaccines have been approved or are in the approval pipeline, and the California Department of Public Health estimates that California will have enough supplies to vaccinate most Californians in all 58 counties by summer 2021.[11] Dr. Anthony Fauci, Director of the National Institute of Allergy and Infectious Diseases, predicts that widespread vaccinations could help the United States reach early herd immunity by late spring or summer 2021.[12]

The Commission takes specific action in this Resolution in response to the Governor's emergency proclamation and executive orders and to orders from the California Department of Public Health, and in response to the ongoing economic hardship caused by the COVID-19 pandemic, to ensure continued continuity and consistency between all utility actions resulting from the ongoing COVID-19 pandemic.

DISCUSSION

COVID-19 has been extremely disruptive to all Californians and has had severe economic impacts on many Californians. In response to reoccurring natural and manmade disasters prior to COVID-19, the Commission initiated a disaster relief Rulemaking, (R.) R.18-03-011, and adopted a series of requirements for utility companies (electric, gas, water) and communications providers, culminating in customer protection measures adopted in two Decisions, (D.) D.19-07-015 and D.19-08-025.

---

[9] https://edd.ca.gov/newsroom/unemployment-december-2020.htm

[10] https://www.cnn.com/2020/12/20/politics/second-covid-stimulus-package-details/index.html

[11] https://covid19.ca.gov/vaccines/

[12] https://www.npr.org/sections/coronavirus-live-updates/2020/12/15/946714505/fauci-predicts-u-s-could-see-signs-of-herd-immunity-by-late-march-or-early-april

The customer protection measures adopted in R.18-03-011 apply where a gubernatorial or presidential declared emergency relates to the disruption or degradation of service. The COVID-19 pandemic represents a different type of emergency, one where the threat – in this case, a virus – necessitates a response which impacts Californians' ability to access or pay for utility service. Social distancing and shelter-in-place requirements have required the closure of non-essential businesses including bars, dine-in restaurants, and shops, and subsequent employee layoffs have impacted the ability of customers to stay current on utility payments at the same time that shelter in place orders have caused increased usage of utility services and resulted in higher utility bills.

Having access to essential utility services is critical to maintaining Californians' health and safety during the COVID-19 pandemic. Therefore, due to the continued economic harm from the COVID-19 pandemic, the Commission extends to California customers the Emergency Customer Protections from D.19-07-015 and D.19-08-025, as ordered by Resolution M-4842, through June 30, 2021, and the Commission reserves an option to extend. The Commission takes this action in response to extraordinary circumstances and the ongoing state of emergency to ensure continuity of essential services to customers during this health and safety crisis. This Resolution does not establish precedent for standard Commission ratemaking or customer protection processes.

All residential and small business customers in California are eligible for the Emergency Customer Protections set forth below in this Resolution by industry. As we stated in Resolution M-4842, these customer protections are a floor, not a ceiling; utilities may provide additional consumer services or protections.

We direct the electric and gas corporations subject to this Resolution to continue to use the COVID-19 Pandemic Protections Memorandum Accounts (CPPMA) established in Resolution M-4842 to record costs associated with extending the required customer protections in this Resolution and developing the Transition Plan. The purpose of the CPPMA account becomes to record and track incremental costs associated with COVID-19 pandemic as described in Resolution M-4842 and this Resolution collectively. The review of these costs for possible collection in rates will be conducted in a General Rate Case, a Biennial or Triennial (as applicable) Cost Allocation Proceeding, the Energy Resource Recovery Account, or another proceeding. This affords Commission staff an opportunity to review any incremental expense associated with this Resolution.

The electric, gas, communications, and water corporations subject to this Resolution, as specified in the following sections, are directed to ensure compliance with existing statutes, regulations, and ordinances and work in cooperation with all appropriate California, federal, and local government agencies.

I. EXTENDING EMERGENCY CUSTOMER PROTECTIONS FOR RESIDENTIAL AND SMALL BUSINESS CUSTOMERS THROUGH JUNE 30, 2021

Emergency Customer Protections for Electric and Gas Utility Customers

The electric and gas utilities under this Commission's jurisdiction subject to this Resolution are the following: (1) Pacific Gas and Electric Company (PG&E); (2) Southern California Edison Company (SCE); (3) San Diego Gas & Electric Company (SDG&E); (4) Southern California Gas Company (SoCalGas); (5) PacifiCorp; (6) Liberty Utilities (CalPECO Electric) LLC; (7) Bear Valley Electric Service (a division of Golden State Water Company); (8) Southwest Gas Corporation; (9) Alpine Natural Gas, Inc.; (10) West Coast Gas Company, Inc.; and (11) Catalina Island Gas Services.

The electric and gas utilities subject to this Resolution shall each file a Tier 1 Advice Letter with the Commission's Energy Division no later than 10 days after the issuance of this Resolution demonstrating compliance with the extension of Emergency Customer Protections to June 30, 2021. Electric and gas corporations shall serve copies of the Advice Letters to 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 proceeding service lists. Should any of the actions utilities are taking to implement Emergency Customer Protections need to be revised from the prior Resolution M-4842 Advice Letter compliance filings, or if certain customer protections were inapplicable during the pandemic and not already noted and accepted as such in prior filing, these revisions should be noted in the Tier 1 Advice Letter to this Resolution. The Emergency Customer Protections identified in Resolution M-4842 are as follows:[13]

(1) waive deposit requirements for residential customers seeking to reestablish service for one year and expedite move in and move out service requests;

(2) stop estimated usage for billing attributed to the time period when a home/unit was unoccupied as a result of the emergency;

(3) identify the premises of affected customers whose utility service has been disrupted or degraded, and discontinue billing these premises without assessing a disconnection charge;

(4) prorate any monthly access charge or minimum charges;

(5) implement payment plan options for residential customers;

[13] Decision 20-06-003, adopted on June 11, 2020, subsequently eliminated certain deposits and fees for residential customers.

(6) suspend disconnection for nonpayment and associated fees, waive deposit and late fee requirements for residential customers;

(7) support low-income residential customers by: (a) freezing all standard and high usage reviews for the California Alternate Rates for Energy (CARE) program eligibility for 12 months and potentially longer, as warranted; (b) contacting all community outreach contractors, the community based organizations who assist in enrolling hard to reach low income customers into CARE, to help better inform customers of these eligibility changes; (c) partnering with the program administrator of the customer funded emergency assistance program for low income customers and increase the assistance limit amount for the next 12 months; and (e) indicate how the energy savings assistance program can be deployed to assist customers;

(8) suspend all CARE and FERA program removals to avoid unintentional loss of the discounted rate during the period for which the customer is protected under these customer protections;

(9) discontinue generating all recertification and verification requests that require customers to provide their current income information;

(10) offer repair processing and timing assistance and timely access to utility customers pursuant to Section 8386(c)(18);

(11) include these customer protections as part of their larger community outreach and public awareness plans under Section 8386(c)(16)(b);

(12) meet and confer with the Community Choice Aggregators as early as possible to discuss their roles and responsibilities for each emergency customer protection.

Emergency Customer Protections for Water Customers

The water corporations under this Commission's jurisdiction subject to this Resolution are the following: all Class-A water utilities (California Water Service Company, California American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities (Apple Valley Ranchos Water, and Park Water), San Jose Water Company, San Gabriel Valley Water Company, and Suburban Water Systems; and all Class-B water utilities (Bakman Water Company, Del Oro Water Company, East Pasadena Water Company, and Alco Water Service).

The water corporations subject to this Resolution shall file a Tier 1 Advice Letter with the Commission's Water Division no later than 10 days after the issuance of this Resolution demonstrating compliance with the extension of Emergency Customer Protections to June 30, 2021. Water corporations shall serve copies of the Advice Letters to R.18-03-011 and R.17-06-024 proceeding service lists. Should any of the actions utilities are taking to extend the Emergency Customer Protections need to be revised from the Resolution M-4842 Advice Letter compliance filings, or if certain customer protections were inapplicable during the pandemic and not already noted and accepted as such in prior filings, these revisions should be noted in the Tier 1 Advice Letter to this Resolution. The Emergency Customer Protections identified in Resolution M-4842 are as follows:

(1) activation of their Catastrophic Event Memorandum Account (CEMA) effective to the date of the Governor's declaration of a state of emergency - March 4, 2020;

(2) make insurance claims on all costs and expenses incurred as a result of the pandemic, and credit insurance payments to their CEMA;

(3) work cooperatively with affected customers to resolve unpaid bills, and minimize disconnections for non-payment;

(4) waive reconnection or facilities fees for customers and suspend deposits for customers who must reconnect to the system;

(5) provide reasonable payment options to customers;

(6) waive bills for victims who lost their homes or if their homes are rendered uninhabitable; and

(7) authorize a pro rata waiver of any fixed element of a water bill for the time that the home is uninhabitable, even if the reason for it being uninhabitable is not loss of water service.

Emergency Customer Protections for Communications Customers

The Emergency Customer Protections established in D.19-08-025 ensure that residential and small business communications service customers who experience a housing or financial crisis due to a disaster keep vital services and receive support in the wake of the disaster.

The customer protections for facilities based and non-facilities-based landline providers (*e.g.*, 9-1-1/E9-1-1 providers, LifeLine providers, Voice over Internet Protocol (VoIP) providers, Carriers of Last Resort (COLRs), and other landline providers) are:[14]

(1) Waiver of one-time activation fee for establishing remote call forwarding, remote access to call forwarding, call forwarding features and messaging services;

(2) Waiver of the monthly rate for one month for remote call forwarding, remote access to call forwarding, call forwarding, call forwarding features, and messaging services;

(3) Waiver of the service charge for installation of service at the temporary or new permanent location of the customer and again when the customer moves back to the premises;

(4) Waiver of the fee for one jack and associated wiring at the temporary location regardless of whether the customer has an Inside Wire Plan;

(5) Waiver of the fee for up to five free jacks and associated wiring for Inside Wiring Plan customer upon their return to their permanent location;

(6) Waiver of the fee for one jack and associated wiring for non-Plan customers upon their return to their permanent location;

Decision 19-08-025 describes the customer protections for wireless providers (e.g., those that provide access to E9-1-1 and/or Lifeline services) as follows. Items 1-6 below apply to facilities-based wireless providers, and items 4-7 apply to resellers and non-facilities-based wireless providers, (*e.g.* mobile virtual network operators [MVNOs]):[15]

(1) Deploy mobile equipment, including Cells on Wheels and Cells on Light Trucks, to supplement service in areas that need additional capacity to ensure access to 9-1-1/E9-1-1 service;

(2) Provide device charging stations in areas where impacted wireless customers seek refuge; and

(3) Provide WiFi access in areas where impacted wireless customers seek refuge.

---

[14] D.19-08-025 at 31-33.

[15] *Id.* at 33.

The following are directed to all facilities-based and non-facilities based wireless providers, including resellers:[16]

(4) Provide mobile phones for customers seeking shelter from a disaster to use temporarily at a county or city designated shelter.

(5) The Commission urges wireless carriers to allow customers to defer or phase payment for coverage charges for data, talk, and text for defined periods of time;

(6) The Commission urges wireless carriers to extend payment dates for service for defined periods of time;

(7) Consider providing temporary replacement phones for customers whose phones were lost or damaged as a result of a disaster or evacuation.

Decision 19-08-025 incorporates the interim emergency protections applicable to LifeLine service adopted in D.18-08-004,[17] which are in effect during the COVID-19 state of emergency for all providers of LifeLine service:[18]

(1) Delay the California LifeLine Renewal Process and suspend the de-enrollment for non-usage rules; and

(2) Implement the LifeLine outreach methods.

In Resolution M-4842, we directed the utilities and communications service providers to conduct outreach of these protections to customers, and with this Resolution we direct that this outreach shall continue through June 30, 2021.

Communications corporations subject to this resolution shall each file a Tier 1 Advice Letter no later than 10 days after this Resolution's approval demonstrating compliance with the extension of Emergency Customer Protections to June 30, 2021. Communications corporations shall serve copies of the Advice Letters to the R.18-03-011 proceeding service list. Should any of the actions taken to implement Emergency

---

[16] *Id.* at 34.

[17] D.18-08-004 at 9.

[18] Nothing in this Resolution supersedes other customer protections which may be ordered by the Commission. For example, the March 19, 2020 Assigned Commissioner Ruling (ACR) in R.20-02-008 suspended the LifeLine renewal process, including de-enrollment due to the renewal process, for all California LifeLine participants including those who do not meet federal LifeLine eligibility criteria for a period of 90 days from the date of the ACR unless modified by a Commission decision. (R.20-02-008 ACR at 3.) These protections were also extended through February 28, 2021 through a similar ACR issued November 24, 2020.

Customer Protections need be revised from already disposed Resolution M-4842 Advice Letter compliance filings, or if certain customer protections were inapplicable during the pandemic and not already noted and accepted as such in prior filing, these revisions should be noted in the Tier 1 Advice Letter to this Resolution.

II. TRANSITION PLAN FOR THE EXPIRATION OF EMERGENCY CUSTOMER PROTECTIONS

On October 30, 2020, the CPUC and the State Water Resources Control Board jointly hosted a workshop on Water Affordability During COVID-19. On November 12, 2020, the CPUC hosted a Workshop on the Impacts of COVID-19 on Energy Customers and Customer Programs.[19] The data presented at these workshops showed significant growth in the number of customers with arrearages, and in arrearage amounts, in the period of March 2020 to present. There is a need for facilitating customers' enrollment in programs to manage their arrearages.

After the customer protection period expires, the electric, gas, and water corporations subject to this Resolution (collectively, IOUs) will return to implementing programs and utility service as per the non-emergency state Commission decision directives.

To facilitate a smooth transition for customers when the Emergency Customer Protections are lifted, each electric, gas, and water corporation subject to this Resolution shall file a Tier 2 Advice Letter with its transition plan, or "Transition Plan Advice Letter," by April 1, 2021. These IOUs shall design the transition plan to effectively ease customers through a transition off of the Emergency Customer Protections (and, in the case of water IOUs, the future expiration of the disconnect moratorium in the Governor's Executive Order N-42-20) 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.

The Emergency Customer Protections extended to communications customers in Resolution M-4842 did not include a moratorium on disconnections for nonpayment, however the Commission imposed a 90 day moratorium on disconnections for non-payment for communications customers in Resolution M-4848,[20] therefore we determine that outreach to customers concerning the expiration of the Emergency Customer Protections is sufficient and that communications corporations are not required to file transition plans.

---

[19] Materials available at: https://www.cpuc.ca.gov/covidworkshop/

[20] Resolution 4848 Issued December 18, 2020
https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M355/K761/355761752.PDF

The transition plan shall 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. IOUs should take into account the challenges and solutions discussed in the October 30 and November 12, 2020 COVID workshops as they prepare their transition plans.

Content of Transition Plans for Energy and Water Utilities

1. Activities Timeline

The IOUs' transition plans shall map out a timeline of activities associated with programs or initiatives that assist customers in bill management. Relevant programs include, but are not limited to, 1) bill assistance programs: California Alternate Rates for Energy (CARE), Family Electric Rate Assistance (FERA), Customer Assistance Program (CAP), medical baseline; 2) bill payment options: energy Arrearage Management Plan, 12-month payment plan; and 3) customer programs and rates: Time of Use residential rate structure for energy IOUs, Energy Savings Assistance Program. Activities can be categorized as those associated with programs/initiatives that were approved and/or started since the pandemic shelter in place order in March 2020, and activities which were suspended for an already existing program as a result of Emergency Customer Protections and will resume.

The discussion of new activities should focus on programs/initiatives that IOUs can leverage to support their transition plan or should be coordinated among other activities for a smooth transition. New activities shall include, but are not limited to, those associated with the following new programs:

- Applicable Payment Plan options (energy Arrearage Management Plan, 12-month payment plan)
- Time of Use residential rate structure for energy IOUs

Resumed activities shall include, but are not limited to:

- Noticing of risk of disconnection
- Verification of customer eligibility in California Alternate Rates for Energy (CARE), Family Electric Rate Assistance (FERA), Customer Assistance Program (CAP), etc.
- Requirement for customer recertifications of eligibility for programs

- Application of late-payment, reconnection, and other fees to a customer[21]

Activities that should be noted on the timeline include communications to customers related to a pending change to the customer's service or status of enrollment in a program, a required action by customers to maintain existing services or program status, and all other communications about transitions or events that could trigger a group of customers' alarm or unease. Activities can also include relevant Commission Decision-mandated activities.

IOUs shall demonstrate through the sequencing and timing of activities, and defining which groups of customers will be impacted by each activity, that the timeline has been thought through from a customer-impact lens, and is part of a coordinated and thus more effective marketing, education, and outreach strategy.

2. Marketing, Education, and Outreach Strategy

The IOUs shall include a coordinated, effective, and efficient strategy for their marketing, education, and outreach plan to engage and enroll customers in new bill management programs, to inform customers already enrolled in programs about changes due to the Emergency Customer Protections being no longer in effect after June 30, 2021 (and, in the case of water IOUs, the future expiration of the disconnect moratorium in the Governor's Executive Order N-42-20), and to inform customers of the extension of the customer protections, where necessary.

The marketing, education, and outreach strategy must include, but is not limited to:

- targeted outreach to customers with arrears, and for water utilities to customers that may qualify for disconnection preventions due to medical needs pursuant to Senate Bill (SB) 998[22]
- general marketing and outreach to customers on assistance programs

---

[21] Do not include any fees eliminated with the intent that they not be resumed after Emergency Customer Protections lift, such as residential reconnection fees per D.20-06-003. Also, fees that would have been (but were not) assessed during the Emergency Customer protections period shall not be back-billed (or otherwise charged) to customers after expiration of Emergency Customer Protections.

[22] Senate Bill 998 was signed into law in September 2018 and is referred to as "The Water Shutoff Protection Act."

https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180SB998

- coordination with the California Department of Community Services and Development and their local service providers to:
  - facilitate customers' access to federal assistance Low Income Home Energy Assistance Program, and
  - leverage their customer interactions for expanding outreach efforts on IOUs' bill management programs
- for electric IOUs with CCAs serving customers in their jurisdiction, sharing customer education materials with the CCAs in advance of their distribution to customers
- the timing and incremental budget, if necessary, for ME&O efforts

IOUs must detail how the ME&O strategy supports and is aligned with the Activities Timeline. IOUs shall identify which, if any, activities in the timeline will receive a disproportionately large ME&O effort and provide reasoning for this activity receiving enhanced ME&O. IOUs shall indicate which ME&O efforts were already ongoing that they are leveraging to support the transition plan versus which ME&O activities are new proposals.

IOUs should consider the following as they develop their ME&O strategy:

- 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[23]
- How best to combine messaging to customers on multiple aspects of the transition plan (e.g., forthcoming changes resulting from expiration of Emergency Customer Protections, and bill management options), so customers receive fewer and coordinated communications, rather than multiple messages
- A plan for identifying and coordinating with other agencies and/or entities that can directly contact customers

[23] At the May 22, 2020 CARE All-Party meeting Commissioners asked Energy IOUs about increasing data sharing frequency from bi-annually (Question 3.b. from detailed agenda of All-Party Meeting on California Alternate Rates for Energy (CARE) education and outreach in light of COVID-19 noticed to service lists.) In response, an additional data exchange occurred in July, and utilities have discussed increasing frequency – September LIOB full committee meeting Water Division update, slide 3: https://liob.cpuc.ca.gov/wp-content/uploads/sites/14/2020/12/Item-005b_CPUC-Water-Update-LIOB-200917.pdf. The matter of mandating any change in frequency may be addressed in Phase 2 of R.17-06-024 and thus is inappropriate to mandate here.

- Training for IOU call center staff on IOU programs and associated activities
- The appropriate method of customer communication, including non-English languages and forms for communication to reach people with disabilities and other access and functional needs

Wherever possible, IOUs must strive for statewide consistency within each industry (consistent between energy utilities, and consistent between water utilities) in marketing materials and strategy. Consistency serves to 1) ease confusion and/or increase efficiencies for customer facing entities supporting IOUs in executing the ME&O strategy, 2) reduce challenges for call centers receiving customer reports from customers across multiple utilities, and 3) ease processing and interactions between regulators and utilities as utilities report on their implementation of the plan.

Individual IOUs shall look to those IOUs actively planning or implementing marketing, education, and outreach efforts, and leverage any effective practices to greatest extent practicable, i.e., activities that have been highlighted by stakeholders as an example to follow in meetings, workshops, and/or through party responses to IOU Advice Letters and/or applications. IOUs shall propose in their prepared presentations to LIOB what marketing materials and strategy they can make consistent statewide (i.e., across all IOUs). See also section below on "Authorities Delegated to Divisions."

3. Compliance and safety

Each IOU must explain in their Transition Plan Advice Letter how the transition plan maintains alignment with program enrollment targets, program eligibility requirements, and customer protections in effect outside Emergency Customer Protections (e.g., bans on requirements that energy customers pay a deposit to enroll in 12-month payment plan) established by Commission Decisions for relevant programs as outlined in Section 1, Activities Timeline.

In particular, for the four large energy IOUs, PG&E, SCE, SoCalGas, and SDG&E, the transition plan shall include both:

1) The number and percent of unique customers, by ZIP code, who are
   a. more than 90 days in arrears, and
   b. not enrolled in a Recent Applicable Payment Plan or conventional extended payment plan.
2) The number and percent of unique customers, by ZIP code, who are
   a. more than 90 days in arrears,

b. not enrolled in a Recent Applicable Payment Plan or conventional extended payment plan, and

c. more than $250 in total arrears.

The other energy IOUs, the Small Municipal Jurisdictional Utilities, shall report as above, but for their entire geographic region (not broken out by ZIP code).

For Class A water IOUs, the transition plan shall include the number and percent of customers who are projected to be facing disconnection after June 30, 2021 if the Governor's Executive Order N-42-20 were to expire, and a schedule that complies with SB 998 requirements[24], including but not limited to providing at least 60 days after the payment is delinquent before a customer may be disconnected.

IOUs must also discuss how the plan ensures activities are safe and consistent with all appropriate state and local health orders.

4. Progress tracking and reporting

IOUs must include a plan for reporting progress on activities in the timeline, and present metrics they will track and report to monitor success in achieving the goal of effectively easing customers through a transition off of Emergency Customer Protections (and, in the case of water IOUs, the future expiration of the disconnect moratorium in the Governor's Executive Order N-42-20) by proactively enrolling customers in programs to manage their utility bills and informing relevant customers of the changes to programs in which they are already enrolled. Reporting frequency shall be monthly and the first report shall include baseline data associated with progress metrics. A progress metric shall be included for both of the following areas for tracking and reporting:

i) Customers that enrolled in a bill assistance program (as described in Section 1, Activities Timeline) when Emergency Customer Protections were in place are successful in sustaining their enrollment in the program if they still meet eligibility criteria

[24] On September 28, 2018, Senate Bill 998 (SB 998) was signed into legislation effective February 1, 2020. This bill requires all public water systems (with more than 200 connections) to have a written policy on discontinuation of residential water service, provide that policy in multiple languages, include provisions for not shutting off water for certain customers that meet specified criteria, prohibit the shutoff of water service until the bill has been delinquent for 60 days (bills are delinquent after 19 days), and cap the reconnection fees for restoring service. Water IOUs have accordingly filed advice letters to revise existing tariff rules and fee schedules to fully incorporate the provisions of SB 998.

ii) New enrollments of impacted customers in payment programs since beginning implementation of the transition plan

For illustrative purposes, we provide examples of progress metrics that track utility success in sustaining customer enrollment in programs (metric area "i."):

- Number and percent of newly enrolled customers that are able to stay on the income qualified bill assistance programs post June 30, 2021
- Number and percent of customers required to take actions to remain on income qualified bill assistance programs (e.g., recertification, post enrollment verification) that successfully complete those actions

Examples of progress metrics that track utility success in new customer enrollments (metric area "ii."):

- Number of customers enrolled in payment plans for arrearages
- Dollar amount of payments made pursuant to a payment plan and remaining balance for unique customers enrolled in payment plans.
- Number of unique customers more than 90 days in arrears by ZIP code and as a percentage of all unique accounts in the ZIP code
- Number of energy customers enrolled in arrearage management plans (AMP) and number enrolled as a percentage of total customers eligible for AMP
- Dollar amount of arrears eliminated via AMP credit and dollar amount of remaining arrears for energy customers enrolled in AMP

In order for energy and water IOUs to have the flexibility to incorporate information on programs offering assistance to customers which are approved after the approval of transition plans into ME&O activities and material, the utilities are to report these additions in their monthly report.

IOUs shall report these progress metrics and the any additions to transition plans monthly. Energy IOUs shall report in the monthly report required by the Disconnections Proceeding, R.18-07-005.[25] Water IOUs shall provide ongoing monthly reports to Water

[25] Ordering Paragraph 6 of the Decision (D.) adopting interim disconnection rules for energy IOUs, D.18-12-013, directed IOUs to file monthly reports on disconnections and arrearages.

Division leveraging monthly reporting required by R.17-06-024. The Industry Division's disposition of the Transition Plan Advice Letter will indicate the first monthly report delivery date.

Costs and Accounting

In some Decisions, Energy IOUs are explicitly directed to conduct or propose ME&O efforts (e.g., medical baseline enrollment portion of Disconnections Proceeding, Wildfire Mitigation Plan, and Time of Use rates). In other Decisions that do not spell out specific ME&O requirements or budgets, IOUs are still expected to craft and execute necessary ME&Os to meet the Decision's mandates (e.g., the new AMP and 12-month payment plan elements set out in D.20-06-003). Therefore, all resumed and new start activities are already funded through Commission Decisions from their respective proceedings.

The ME&O strategy required here coordinates existing ME&O efforts to meet the goals of the transition plans. In other words, Energy IOUs should use existing ME&O budgets, to the greatest extent practicable. If an IOU estimates that it cannot both comply with this Resolution and maintain compliance with existing Decision mandates leveraging only existing authorized budgets, it shall note in its Advice Letter the cost estimate, with details of the incremental new activity, and use the memorandum account to record and track incremental costs associated with transition plan implementation. Water IOUs are encouraged to leverage existing outreach and marketing budgets, including for conservation programs and low-income programs.

Process Requirements for Transition Plan Advice Letter Development and Submission

By February 25, 2021, IOUs shall submit drafts of Transition Plan Advice Letters to CPUC staff (Gillian.Weaver@cpuc.ca.gov), who will share them with the LIOB and post them publicly on the LIOB website (liob.org). At the first quarterly LIOB meeting of 2021 (tentatively scheduled for March 11, 2021), electric, gas, and water utility staff shall prepare to present the draft transition plans during the LIOB meeting. In preparation for presenting their transition plans to the LIOB, IOUs shall work together (water IOUs amongst themselves, and energy IOUs amongst themselves) to develop a presentation template and comparison framework to present their transition plans to the Board in a consistent manner and to highlight the similarities and differences between their transition plans.[26] IOUs shall provide the template and framework to the LIOB chair and/or Commission's Industry Division staff for advance review upon request. In areas where the transition plans have differences, IOUs shall include in the framework

[26] When populating the framework developed by energy IOUs, energy IOUs may present two populated frameworks, one to show similarities and differences among Small Municipal Jurisdictional Utilities (SMJUs), and another to compare among the large energy IOUs.

presented to LIOB either the intent to revise the transition plans to bring the plans into alignment, or explain why they will retain the differences in their respective transition plans. The LIOB chair will coordinate the IOUs' presentations.

Board members will provide feedback and recommendations to the IOUs' drafted transition plans. The IOUs shall consider and incorporate LIOB board member input where feasible, and any Commission staff feedback, and submit final Advice Letters on April 1, 2021. Electric and gas corporations shall serve copies of Advice Letters to 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 proceeding service lists, and the service list of any new proceeding established to Address Energy Utility Customer Bill Debt Accumulated During the Coronavirus Pandemic. Water corporations shall serve copies of Advice Letters to R.18-03-011 and R.17-06-024 proceeding service lists.

Criteria for CPUC Industry Division Review and Approval of Transition Plans

The criteria by which Division staff will review and approve IOU Transition Plan Advice Letters are:

- The Advice Letter addresses all elements required by this Resolution;
- The plan incorporates LIOB member feedback, where feasible, and Commission staff feedback;
- The metrics in the plan for tracking and reporting progress toward the transition plan goals are specific, measurable, and meaningful; and the methodology, including dates of measurement periods, for calculation of any baseline value and each monthly (at minimum) progress tracking value for metrics is clear;
- It appears likely that the timing of activities and the ME&O strategy in the transition plan will result in a positive impact from customer perspective compared to IOUs operating in absence of the transition plan;
- The ME&O efforts are coordinated with and not duplicative of existing marketing, outreach and education efforts, efficient and effective use of existing marketing education and outreach efforts and associated funds is demonstrated, and the customer lens is clearly articulated; and
- The IOU's implementation of its proposed transition plan will not preclude its compliance with existing statutes, regulations, ordinances.

Authorities Delegated to Division Director

The director of the division reviewing and disposing of Transition Plan Advice Letters is delegated the authority to direct an IOU to conform to another IOU's proposed activity in their transition plan activities timeline and/or ME&O strategy where it is applicable and beneficial for consistency statewide. The director of the division also has delegated authority to direct consistency across IOUs in tracking and reporting.

In order to anticipate and prepare for implementation of the transition plans, IOUs should read other IOUs' draft Transition Plan Advice Letters submitted on February 25, 2021 to the LIOB to identify similarities and differences, and evaluate for themselves areas of improvement, consistency, and best practices to incorporate into their own plans before submission of the final Advice Letter.

As tracking costs within a memorandum account does not constitute approval of cost recovery, no further approval by staff will be necessary for the IOU to track any incremental costs noted in Transition Plan Advice Letters to the CPPMA or CEMA. However, IOUs, per the discussion above, should seek every opportunity to constrain implementation costs by alignment with existing ME&O efforts, and should provide detail and justification of incremental costs for the plans required here. IOUs should be prepared to answer questions from LIOB members and Commission staff about incremental cost estimates.

COMMENTS

Public Utilities Code section 311(g)(1) provides that this Resolution must be served on all parties and subject to at least 30 days public review and comment prior to a vote of the Commission. Section 311(g)(2) provides that this 30-day period may be reduced or waived "in an unforeseen emergency … ." The Commission's Rules of Practice and Procedure also provide that public review and comment may be waived or reduced in an "unforeseen emergency situation" specifically where there are "[a]ctivities that severely impair or threaten to severely impair public health or safety…" (Rule 14.6(a)(1) and/or where there are "[c]rippling disasters that severely impair public health or safety." (Rule 14.6(a)(2)). "Requests for relief based on extraordinary conditions in which time is of the essence." (Rule 14.6(a)(2)). "Unusual matters that cannot be disposed of by normal procedures if the duties of the Commission are to be fulfilled."

The 30-day comment period is shortened to 14 days pursuant to these authorities due to the ongoing COVID-19 pandemic in California. Accordingly, the draft Resolution was mailed on January 15, 2021. Parties submitted Opening Comments on January 22, 2021, and Reply Comments on January 29, 2021.

Interested persons can also participate in the Advice Letter processes directed by this Resolution.

The draft Resolution and Comments were served on the following service lists:

R.18-03-011 (Emergency Customer Protections)

A.19-11-003, A.20-03-014 (California Alternate Rates for Energy and Energy Savings Assistance Programs of large IOU and SMJU)

R.15-03-010 (Access to Affordable Energy in the San Joaquin Valley)

R.18-07-006 (Assessing Utility Service Affordability)

R.18-07-005 (New Approaches to Disconnections and Reconnections)

R.12-06-013 (Examination of IOUs' Residential Rate Structures)

A.19-09-014 (SDG&E Application to Eliminate Seasonal Differential in Residential Rates)

R.17-06-024 (Evaluating Low-Income Rate Assistance Programs for Water Utilities)

Opening Comments were filed by California Community Choice Association (CalCCA), CTIA – The Wireless Association (CTIA), California Water Association (CWA), Great Oaks Water Company (Great Oaks), the Utility Reform Network, Center for Accessible Technology, and National Consumer Law Center (Joint Consumers), PG&E, SCE, SDG&E, and SoCalGas. on January 22, 2021.

Reply Comments were filed by the California Cable & Telecommunications Association (CCTA), CTIA, the Greenlining Institute (Greenlining), Joint Consumers, PG&E, Free Energy Savings Company LLC, d/b/a Quality Conservation Services (QCS), SCE, SDG&E, SoCalGas, and Southwest Gas Corporation (Southwest Gas) on January 29, 2021.

Comments fell into the following categories:

- Communications Corporation Customer Protection Expiration Date
- Applicability of Advice Letters Filed in Response to Resolution M-4842
- Coordination with Governor's Office and State Water Resources Control Board on Disconnection Moratorium for Water Utilities

- Coordination with Community Choice Aggregators on Development of Transition Plans
- Memorandum Accounts and Marketing Education and Outreach Costs
- Projected Disconnections Reporting for Energy IOUs
- Disconnections Monthly Cap Calculation Methodology for Energy IOUs
- Draft Transition Plan Timing and Content
- Transition Plan Implementation Timing
- Including Other Programs in Transition Plans
- Similarities and Differences Between IOUs' Transitions Plans
- Comments Within the Scope of Another Proceeding

Comments also suggested clarifications on matters such as the fees that IOUs may charge customers after the customer protections expire, whether the sample metrics are illustrative or mandatory, and the role of the Water Shutoff Protection Act of 2018 (SB 998).

Below is a summary of the comments that argued for the most substantive changes to the draft Resolution. This is not an exhaustive list of all the comments received, nor all the edits made to the draft Resolution.

Communications Corporation Customer Protection Expiration Date

CTIA urged the Commission against further extending the wireless customer protections on the grounds that the customer protections offer customers no benefit during a pandemic, may put wireless providers' employees at risk, and may encourage Californians to violate social distancing requirements. CTIA further argued that the Commission is acting beyond its authority.

In Resolution M-4842, the Commission contemplated the some of the protections adopted in R.18-03-011 would not be applicable during a pandemic, stating:

> we acknowledge that some of the provisions adopted in D.19-07-015 and D.19-08- 025 in response to disasters such as earthquakes and wildfires may not apply in the case of a pandemic; for example, the requirement that electric and gas utilities identify the premises of affected customers whose utility service has been disrupted or

> degraded and discontinue billing these premises without assessing a disconnection charge. If the electric, gas, communication, and water corporations subject to this Resolution believe that specific provisions from D.19-07-015 and D.19-08-025 do not apply during the pandemic, they shall identify such provisions in their Advice Letters and provide a justification for why they believe the provisions do not apply.[27]

This flexibility is fully responsive to CTIA's concerns regarding the applicability of wireless customer protections. The Commission addressed its jurisdiction to adopt wireless customer protections in D.19-08-025, and we will not relitigate the matter here.

Joint Consumers noted that the moratorium on disconnecting communications services adopted in Resolution M-4848 expires on April 18, 2021, and urged the Commission to extend the moratorium until June 30, 2021, to allow consistent marketing, education, and outreach. CCTA and CTIA objected to Joint Consumers' request to extend the disconnect moratorium from Resolution M-4848, arguing that it is unnecessary as well as procedurally improper, and that Resolution M-4848 has a mechanism to extend the date if necessary.

The Commission declines to extend the duration of the disconnect moratorium adopted in Resolution M-4848, which has only recently gone into effect. Resolution M-4848 gives the Executive Director the ability to extend the communications disconnect moratorium, and the Commission will continue to monitor developments.

Applicability of Advice Letters Filed in Response to Resolution M-4842

CalCCA supports extending the customer protections, and urges that the protections implemented pursuant to Resolution M-4842 remain the same during the extension. CalCCA requested that PG&E continue its suspension of Tariff Rule 23.R.3 or partial payments, and that SCE continue its existing practices for application of partial payments by unbundled customers. PG&E agreed with CalCCA, stating that it intends to extend all the customer protections, including the *pro rata* allocation of partial payments received from residential customers served by a third-party service provider. Likewise, SDG&E replied that it plans to continue the pro rata allocation for all CCA customers who are eligible for the Emergency Customer Protections through June 30, 2021.

The Commission notes that both PG&E and SDG&E indicate that they are maintaining pro rata allocation for CCA customers. The Commission anticipates that the protections

[27] Resolution M-4842, at 4.

originally implemented pursuant to Resolution M-4842 will remain the same through June 30, 2021, and directs utilities to indicate in their Tier 1 Advice Letters whether and why they intend to change any of the protections applicable through June 30, 2021.

PG&E observed that Ordering Paragraph 6 of D.19-07-015 requires certain energy and water IOUs to "… file a Tier 1 Advice Letter at the default, 12-month conclusion of customer protection period." PG&E requested that the Commission extend the due date of the Tier 1 Advice Letter required by D.19-07-015 to August 16, 2021, 45 days from the Draft Resolution's proposed expiration of the customer protections, so that PG&E may gather data for the entire period that the customer protections were in place. SoCalGas requested that the Commission extend the submittal date of the Tier 1 Advice Letter to the default, 12-month conclusion of the protection period pursuant to D.19-07-015, OP 6, stating that should the Commission grant this request, the Tier 1 Advice Letter would be submitted within 10 days from April 16, 2021.

In D.19-07-015, the Commission adopted post-disaster reporting requirements:

> After the conclusion of the disaster or at the default, 12-month conclusion of the customer protection period, the utilities shall file another Tier 1 Advice Letter detailing the protections offered, outreach efforts, and customer impacts.[28]

The Tier 1 Advice Letter required by this Resolution is intended only as a confirmation that the customer protections are being extended through June 30, 2021. It is not the full post-disaster Advice Letter required by D.19-07-015, and as such, we decline to alter the due date for the Tier 1 Advice Letter required by this Resolution. While Resolution M-4842 and this Resolution apply the rules adopted in R.18-03-011 during the COVID-19 pandemic, this Resolution is not the proper vehicle to alter any of the rules adopted in R.18-03-011, including the due date of the Advice Letter due at the expiration of the customer protection period as adopted in D.19-07-015, therefore we decline to alter the applicable filing deadline for post-disaster reporting adopted in D.19-07-015.

PG&E stated that the Draft Resolution does not specify what costs IOUs are permitted to record in their CPPMAs, and requested that it be allowed to continue to record some of the same expenses that the Commission approved in PGE's Advice Letter to Resolution M-4842, specifically the uncollectibles expenses for residential and small business customers and the incremental COVID-19 related uncollectibles and pro rata costs of the associated credit facilities.

[28] R.18-03-011, D.19-07-015, at 40-41.

Although the Commission anticipates that utilities will incur many of the same expenses during the extension of the customer protections as they have incurred since the Commission adopted Resolution M-4842, the Commission declines to itemize the expenses that utilities may record in their CPPMAs,

Coordination with Governor's Office and State Water Resource Control Board on Water Disconnection Moratorium

Great Oaks encouraged the Commission to collaborate with the Governor's office and the State Water Resource Control Board (Water Board) regarding the lifting of the disconnections moratorium.

CWA recommended that the timeline for such advice letters be coordinated with efforts co-led by the Water Board to ensure a consistent set of approaches by water service providers throughout the State.

On April 2, 2020, Governor Newsom issued a moratorium on disconnections for non-payment for residential and small business water utility customers in Executive Order N-42-20. That moratorium is independent from the customer protections adopted in R.18-03-011 and extended in this Resolution, and applies to water utilities both within the Commission's jurisdiction and those outside of the Commission's jurisdiction. While the Commission will not set the terms under which the Governor will ultimately lift the disconnect moratorium in Executive Order N-42-20, uncertainty concerning the expiration of the Executive Order should have no effect on the Commission-regulated water IOUs' ability to develop their transition plans. Water IOUs may prepare transition plans consistent with the requirements of this Resolution and note that the date on which certain activities will commence is unknown due to the uncertainty concerning the expiration of Executive Order N-42-20. Water IOUs may use placeholder dates, e.g., 10 or 20 days after the expiration of the Executive Order, as appropriate.

Coordination with Community Choice Aggregators on Transition Plan Development

CalCCA stated utilities should coordinate with the Community Choice Aggregators (CCAs) with overlapping jurisdiction in the development of the mandated transition plans.

The Commission rejects this request, as CalCCA did not establish how it would be beneficial to have IOUs coordinate the development of their transition plans with the CCAs, and adding a coordination requirement could slow the ability and effectiveness of electric IOUs' transition plan development.

The Commission has, however, already encouraged utilities to consider coordinating with other entities regarding their ME&O, stating in the ME&O strategy section above that the "IOUs should consider … [a] plan for identifying and coordinating with other agencies and/or entities that can directly contact customers." The Commission has revised this Resolution to require the electric IOUs with CCAs serving customers in their jurisdiction to share customer education materials developed per the Transition Plan ME&O strategy with the CCAs in advance of their distribution to customers, so that CCAs may have the opportunity to amplify these communications and help ensure that CCA customers are aware of their options as the customer protections expire.

Memorandum Account and Marketing Education and Outreach Costs

Great Oaks argued that the Draft Resolution incorrectly assumes that water IOUs have budgets for ME&O. Great Oaks stated that it does not have a budget for ME&O, and requested that the Commission modify Draft Resolution M-4849 to allow for the recovery of unbudgeted ME&O expenses directly resulting from the Draft Resolution's requirements. Joint Consumers noted that the Draft Resolution directs IOUs to use existing ME&O budgets "to the greatest extent practicable" to conduct the ME&O activities required by the Draft Resolution. Joint Consumers argued that IOUs which record incremental ME&O expenses in a memorandum account should have the burden of proof to demonstrate why they cannot meet the Draft Resolution's mandates using existing authorized ME&O budgets.

CWA stated that it does not object to requiring IOUs to estimate transition plan activity expenses in their Advice Letters. CWA argued that it would be inappropriate for the Commission to prejudge the reasonableness of projected transition plan expenses in its Advice Letter dispositions and asked that the Commission review the reasonableness of transition plan expenses consistent with the Commission's standard treatment of memorandum account balances.

While IOUs are authorized to record expenses associated with the COVID-19 pandemic in their respective memorandum accounts, the recovery of expenses recorded in a memorandum account requires an Application and a separate process. The Commission agrees with CWA that it would be inappropriate to prejudge any determinations that may be made in response to IOUs' Applications for transition plan cost recovery from their memorandum accounts. Therefore we deny Great Oaks' request that this Resolution allow recovery of specific expenses and Joint Consumers' request that this Resolution establish the IOUs' required showing during their Applications for cost recovery.

The Joint Consumers are correct in reflecting that the IOUs are directed to use existing ME&O budgets "to the greatest extent practicable" to conduct the ME&O activities required by this Resolution. While Great Oaks stated the Commission made an incorrect assumption that water IOUs have budgets for ME&O, we remind the water IOUs there are approved education and outreach budgets for various programs, such as water conservation, and water IOUs should consider using these budgets where practicable and permissible per Commission decisions that established these budgets.

Projected Disconnections Reporting for Energy IOUs

Multiple parties commented on the Draft Resolution requirement that energy IOUs project the number and percentage of customers eligible for disconnection after June 30, 2021 in their Transition Plans. PG&E argued that accurately projecting the number of customers eligible for disconnection multiple months in the future was not possible and urged the Commission to eliminate this requirement. SoCalGas argued that such a projection could be made pursuant to specific, quantifiable items, such as the number of customers with arrearages older than a certain threshold, but that disconnection also depends upon subjective factors that cannot be captured in the transition plan.

SDG&E noted in its Opening Comments that its ongoing Customer Information System upgrade would prevent the company from implementing new billing and process changes until the conclusion of a required "stabilization period" to reduce systemic risk, but SDG&E's Reply Comments did not identify the reporting requirements in the Draft Resolution as areas of concern.

We agree with SoCalGas's argument that requiring IOUs to report the number of customers matching defined, quantifiable criteria will be more effective in estimating the number of customers at potential risk of disconnection after expiration of the Emergency Customer Protections. Accordingly, the Resolution is revised to require the four large IOUs in their transition plans to report by ZIP code the number of unique customers matching defined, quantifiable criteria, and percentage of total unique customers in the ZIP code the number represents.

We believe the for the number of customers (by ZIP for large energy IOUs) required in the transition plans as described here will not require SDG&E to make any changes to the Customer Information System. Since SDG&E is already required to provide data on customers by various categories of age and size of arrearages on a monthly basis pursuant to R.18-07-005, SDG&E should be able to provide this information in its Transition Plan.

Disconnections Monthly Cap Calculation Methodology for Energy IOUs

Joint Consumers commented that energy IOUs should be required to implement methodological changes to the calculation of their annual disconnection caps. Joint

Consumers note that the rolling cap methodology described in D.20-06-003 uses the previous 12 months of reported disconnections to establish each IOU's number of allowable disconnections, and the 12 months of zero reported disconnections will result in a much higher number of allowable disconnections in the months following the lifting of the emergency customer protections than would have been permissible if IOUs had continued disconnecting customers at normal rates. Joint Consumers propose two alternative methodologies to modify calculation of the rolling cap that would lower the effective number of allowable monthly disconnections for each IOU.

Multiple parties, including PG&E, SCE, SDG&E, and SoCalGas, replied to Joint Consumers and argued that the Commission should not modify the cap calculation methodology. PG&E, SoCalGas, and SCE argued that the establishment of the disconnection cap calculation in D.20-06-003 makes this Resolution an inappropriate mechanism for modification of the cap calculation methodology, and they indicated a Petition for Modification to D.20-06-003 would be the appropriate mechanism to modify the cap calculation methodology. PG&E, SDG&E, and SCE further indicated that there was no risk of a potential surge in disconnections if the cap methodology stays as is, citing operational and policy constraints, including constraints newly imposed since adoption of D.20-06-003, that would prevent IOUs from performing unusually large numbers of disconnections immediately following expiration of the emergency customer protections.[29]

We agree that this Resolution is not the appropriate vehicle to modify the cap established in D.20-06-003. Therefore, we encourage the IOUs to utilize the transition plan process described in this Resolution and all reasonable tools at their disposal, including the many new requirements established by D.20-06-003 governing disconnections, to ensure that there is no sudden surge of disconnections when the emergency customer protections expire.

Draft Transition Plan Timing and Content

SoCalGas requested the draft transition plan, due on February 25th for LIOB review, be in the form of a high-level outline. SoCalGas stated it will have insufficient time to develop the detailed outreach and data for the transition plan.

[29] New policies ordered in D.20-06-003 that restrict en masse disconnections include requirements that energy IOUs must offer customers 12-month payment plans and ensure customers are enrolled in all utility-administered benefit programs before disconnection. IOUs are also prohibited from disconnecting customers with a pending LIHEAP pledge, and IOUs may not disconnect customers when temperatures are forecast to exceed 100 degrees Fahrenheit over a 72-hour look-ahead period. IOUs also may not exceed a monthly disconnection rate of 30 percent in any ZIP code.

CWA seeks additional time beyond the February 25th draft transition plan deadline for IOUs to develop a robust and thoughtful transition plan.

Joint Consumers replied to comments that the required water IOUs transition plans "need to contain options to ease customers out of a moratorium and provide ways for them to remain connected to service before returning to a new status quo as required by SB 998" and are open to a limited extension of no more than 30 days in the filing of the transition plan advice letters.

Joint Consumers replied that accepting SoCalGas's request to deliver a high-level outline runs the risk that "IOUs could submit an outline that is devoid of any meaningful implementation information for the LIOB's review," resulting in final transition plans lacking meaningful input from the LIOB and other stakeholders, which would be an "unacceptable result."

The Commission rejects CWA's request for additional time. The submission of a draft on February 25, 2021 is designed to allow the LIOB the opportunity to review the water and energy IOU transition plans together. Allowing a delay, per the CWA request, would force the LIOB to delegate presentation to and input from LIOB to a follow-on subcommittee meeting and the water IOU transition plans would thus not benefit from full LIOB membership and public engagement.

The Commission also rejects SoCalGas' request to submit a high-level outline on February 25, 2021. The submission should follow the content requirements laid out in the adopted Resolution. Just like implementing the transition plan effectively will require effective collaboration and coordination, developing the transition plan should allow for effective collaboration. Submitting a draft that fully responds to the content required by this Resolution is necessary to allow the iteration with, and reaction from, other knowledgeable entities to ultimately deliver a final transition plan to the Commission on April 1, 2021.

Transition Plan Implementation Timing

Great Oaks argued that Draft Resolution M-4849 offers no facts indicating that the additional 75 days of emergency customer protections will provide utility customers with the kind of assistance they want or need.

With respect to Great Oaks' comments, the Commission has noted above the slow recovery of California's economy and the attendant risk that residential and small business customers will continue to have in paying their bills. The additional 75 days will provide time for development, approval, and implementation of activities in the transition plans before customer protections expire, thus helping ensure that affected

customers have time to learn about and opt into available bill assistance programs before they may face disconnection.

CalCCA referred to transition plans "that will be implemented upon expiration of the existing customer protections." However, the Commission intends, as exhibited by requiring Advice Letters on April 1, 2020, that transition plan implementation start prior to the expiration of customer protections in order to be effective in reaching the transition plans' goal to "effectively ease customers through a transition … by proactively communicating." Implementation will first require approval of transition plan Advice Letters. Therefore, to allow for timely disposition of the Advice Letter for implementation to begin, the Commission is requiring IOUs submit completed draft transition plans, not just outlines, for pre-review by the LIOB and Commission staff prior to the final Advice Letter submission.

Including Other Programs in Transition Plans

The Joint Consumers recommended that IOU transition plans also include information on and promote the availability of any additional utility assistance programs to the extent these resources become available, such as the federal Low Income Home Energy Assistance Program, the new federal Emergency Rental Assistance Program that can be used to pay for utility arrearages (including both energy and water) and current payment obligations, and the new $638 million federal Low-Income Drinking Water and Waste Water Assistance Program to help low-income households with water arrearages and current water bills.

Great Oaks commented that if any Commission Rulemakings are addressing COVID-19 pandemic emergency issues (e.g., the current phase of R.17-06-024 is addressing pandemic emergency issues), future decisions will likely affect and may require changes to the substance of Draft Resolution M-4849. Great Oaks requested that if any Commission decisions are issued, that those decisions address any needed revisions to the Resolution.

CWA commented that if any potential COVID-19 relief package is passed in the United States Congress, the Commission should take a lead role in ensuring that such funding is properly administered to help address the financial challenges and impacts of COVID-19. In particular, CWA asked the Commission to ensure that customers of Commission-regulated water IOUs are not unfairly excluded from any funding.

SoCalGas responded that it is open to Joint Consumers' proposal to include information and promote the availability of other utility assistance programs, but with some limitations. SoCalGas stated that including information in paper documents to customers will take time, and that promotion via web page updates will be more efficient for programs that are only available temporarily, such as federal relief funding. SoCalGas

also recommended that energy IOUs not be required to promote unrelated, non-energy programs.

It is not in the scope of this Resolution for the Commission to assign itself the lead role in ensuring that funding from any potential COVID-19 relief package is received and properly administered and no Commission-regulated IOUs are unfairly excluded from federal funding.

At a minimum, IOUs' transition plans must promote programs available to assist their customers in managing payments to their utility bills. Also, IOUs must design their transition plans with sufficient flexibility to allow new utility-administered customer assistance programs to be incorporated into the ME&O strategy even after the transition plan is approved. If a Commission decision directs the manner in which IOU transition plans should be adjusted to reflect a new program, IOUs shall follow that decision's requirements.

IOUs should also include information on any federal relief funds that are or may become available to assist customers in paying their utility bills. Finally, while IOUs do not have a direct role in supporting customer access to other non-utility federal funds, building the customers' awareness of those funds still ultimately supports the customers' ability to pay their utility bills. If a customer is able to access funds or relief to make payment on another bill, they will have more funds remaining in their household budget to pay their utility bill. Where practical and with minimal to no incremental cost, IOUs may also elect to inform customers of these opportunities.

The monthly reporting shall include a detailed summary of any changes made related to such additions to the ME&O activities and materials as additional programs to assist customers become available.

Similarities and Differences Between IOUs' Transition Plans

SoCalGas said it understands the desire for consistency across IOUs. However, SoCalGas recommended the transition plan requirements be considered recommendations rather than prescriptions in order to allow the IOUs operational flexibility. SoCalGas recommended that the IOUs be given the option to provide transition plan content more conducive to the IOU's billing system constraints. Finally, SoCalGas desires the Commission recognize the need for differences in some elements of its outreach and timelines due to the different seasonal effects in different jurisdictions.

In SoCalGas' Reply Comments, SoCalGas recommended the IOUs be permitted to make decisions on placement, communication channels and frequency of ME&O based on availability and resources.

The Commission does not find the areas prescribed in the ME&O strategy as overly prescriptive, nor that the requirements of the transition plan limit operational flexibility. The required items listed are high-level and must be included by the IOUs in their transition plans, but details on how the IOU will address each required item is open to the IOUs' design. The Commission directs the IOUs to consider other solutions to align with other IOUs' successful ME&O strategies, but also understands aligning with current operational practices of the IOUs may be the least cost solution and that there are reasons that a IOUs transition plan would have differences. The Commission thus adds that as the IOUs compare their transition plans with each other after filing their drafts on February 25, the IOUs work together to prepare to present transition plans to the LIOB as described in the section "Process Requirements for Transition Plan Advice Letter Development and Submission."

Comments Within the Scope of Another Proceeding

QCS argued in Reply Comments that the Commission should pursue solutions that reduce customer arrearages during the pandemic, rather than spreading arrearages over a 12-month payment plan that customers may be unable to afford. QCS stated that, with the exception of CARE programs, Energy Savings Assistance (ESA) program contractors are not allowed to promote or offer or enroll for programs outside of ESA. QCS also contended that most of the IOUs have reduced their ESA budgets, and asked that the IOUs be instructed to maintain the same level of funding for ESA as was approved and planned for 2020. QCS argued that an exception be made to allow ESA Contractors to promote and offer to enroll customers in Commission-approved programs outside of ESA during the pandemic and while recovering from the pandemic, and that those programs' budgets should bear their share of any reasonable costs of providing this service. QCS requested that ESA should be targeted to low-income families in arrears, and that all IOUs report the extent of ESA enrollments for CARE and each of the other programs, as PG&E does.

The Commission notes that QCS raised these issues in Reply Comments, to which other stakeholders have not been able to respond. Regardless, the Commission is unable to adopt QCS' suggestions because payment plan options to manage customer arrearages and CARE and ESA programs and budgets are proposed and adopted in formal proceedings (e.g., the disconnections proceeding, R.18-07-005, and the consolidated CARE and ESA program and budget applications, A.19-11-003). The Commission is precluded from creating or altering policy determinations in the scope of those proceedings in this Resolution. With respect to QCS' request that the IOUs leverage ESA experience with low-income communities when designing their own ME&O strategies, IOUs are free to consider whether and how the ESA workforce may support ME&O efforts within the existing ESA program rules and budgets.

FINDINGS

1. On March 4, 2020, Governor Newsom declared a State of Emergency in California related to COVID-19.

2. On March 19, 2020, Governor Newsom ordered Californians to shelter in place except to meet essential needs.

3. The moratorium on disconnections for non-payment for residential and small business water utility customers in Governor Newsom's Executive Order N-42-20 is independent from the customer protections adopted in R.18-03-011 and extended in this Resolution, and applies to water utilities both within the Commission's jurisdiction and those outside of the Commission's jurisdiction.

4. Social distancing and shelter-in-place requirements have required the closure of non-essential businesses and resulted in layoffs.

5. 54 counties, representing 99.9% of California's population, are in the most restrictive tier of California's reopening roadmap.

6. The regional stay at home order and overnight curfew were lifted on January 25, 2021.

7. California has recovered less than half of the nonfarm jobs it lost early in the COVID-19 pandemic.

8. Lingering unemployment due to the COVID-19 pandemic creates a risk that residential and small business customers may continue to fall behind on utility payments through no fault of their own.

9. The California Department of Public Health expects to be able to vaccinate most Californians against COVID-19 by summer 2021.

10. Dr. Anthony Fauci predicts that the United States could reach early herd immunity by spring or summer 2021.

11. The Commission has previously issued Resolutions and opened Rulemakings to address highly disruptive events, most recently in response the devastating wildfires in Northern and Southern California.

12. In response to the reoccurring natural and manmade disasters, the Commission opened Rulemaking (R.) 18-03-011 and adopted customer protection measures adopted in decisions (D.)19-07-015 and D.19-08-025.

13. Having access to essential utility services is critical to maintaining Californians' health and safety during the COVID-19 pandemic.

14. In order to continue to assist Californians affected by the ongoing COVID-19 pandemic, it is reasonable to provide continuity and consistency between all utility actions related to the pandemic by extending the effectiveness of the customer protection measures ordered in Resolution M-4842 through June 30, 2021, and the Commission reserves an option to extend.

15. The number of customers in arrears, and the arrearage amount, has increased significantly since March 2020.
16. Challenges and solutions to transitioning off the Emergency Customer Protections were presented at CPUC-hosted workshops on October 30 and November 12, 2020.

17. The Emergency Customer Protections extended to communications customers in Resolution M-4842 did not include a moratorium on disconnections for nonpayment, however the Commission imposed a 90 day moratorium on disconnections for non-payment for communications customers in Resolution M-4848, therefore we determine that outreach to customers concerning the expiration of the Emergency Customer Protections is sufficient and that communications corporations are not required to file transition plans.

THEREFORE, IT IS ORDERED that:

1. Electric, gas, communications, and water corporations subject to this Resolution shall continue to apply the customer protection measures for residential and small business customers adopted in D.19-07-015 and D.19-08-025, as ordered by Resolution M-4842, through June 30, 2021.

2. Electric, gas, communications, and water corporations subject to this Resolution shall file a Tier 1 Advice Letter no later than 10 days after this Resolution's approval demonstrating compliance with the extension of Emergency Customer Protections to June 30, 2021. Should any of the actions utilities are taking to implement Emergency Customer Protections need be revised from already disposed Resolution M-4842 Advice Letter compliance filings, or if certain customer protections were inapplicable during the pandemic and not already noted and accepted as such in prior filings, these revisions should be noted in the compliance Advice Letter to this Resolution. Electric and gas corporations shall serve copies of the Advice Letters to 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 proceeding service lists. Water corporations shall serve copies of the Advice Letters to R.18-03-011 and R.17-06-024 proceeding service lists. Communications utilities shall serve copies of the Advice Letters to the R.18-03-011 proceeding service list.

3. Commission staff will review the Tier 1 Advice Letters for compliance with the customer protection measures adopted in D.19-07-015 and D.19-08-025 and Resolution M-4842 and this Resolution.

4. The electric, gas, communications, and water corporations subject to this resolution shall continue to conduct community awareness and public outreach of the customer protection measures adopted in D.19-07-015 and D.19-08-025, as ordered in Resolution M-4842, consistent with the requirements of D.19-07-015, D.19-08-025, and D.20-03-004.[30]

5. Electric, gas, and water corporations subject to this Resolution shall each file Tier 2 Advice Letter with their transition plans for the expiration of Emergency Customer Protections by April 1, 2021. The transition plans shall include 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 accounts for compliance and safety, and 4) a progress tracking and reporting plan. 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, to effectively ease customers though a transition off of Emergency Customer Protections (and, in the case of water IOUs, the future expiration of the disconnect moratorium in the Governor's Executive Order N-42-20). Electric and gas corporations shall serve copies of the Advice Letters to 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 proceeding service lists, and the service list of any new proceeding established to Address Energy Utility Customer Bill Debt Accumulated During the Coronavirus Pandemic. Water corporations shall serve copies of the Advice Letters to R.18-03-011 and R.17-06-024 proceeding service lists.

6. By February 25, 2021, electric, gas, and water corporations subject to this Resolution shall submit drafts of Transition Plan Advice Letters to CPUC staff (Gillian.Weaver@cpuc.ca.gov), who will share them with the LIOB.

7. This order is effective today.

[30] The requirements in D.19-08-025 apply to the communications service providers. The requirements in D.19-07-015 and D.20-03-004 apply to the electrical corporations. The requirements in D.19-07-015 apply to the natural gas and Class A and Class B water corporations.

I certify that the foregoing resolution was adopted by the California Public Utilities Commission at its regular meeting of February 11, 2021 and the following Commissioners approved favorably thereon:

/s/ RACHEL PETERSON
Rachel Peterson
Executive Director

MARYBEL BATJER
President
MARTHA GUZMAN ACEVES
CLIFFORD RECHTSCHAFFEN
GENEVIEVE SHIROMA
Commissioners

ATTACHMENT C

BEAR VALLEY ELECTRIC SERVICE, INC.
COVID-19 EMERGENCY CUSTOMER PROTECTIONS TRANSITION PLAN

BEAR VALLEY ELECTRIC SERVICE, INC.

COVID-19 EMERGENCY CUSTOMER PROTECTIONS TRANSITION PLAN

Sean Matlock
Manager Energy Resource
Bear Valley Electric Service, Inc.
42020 Garstin Drive
P. O. Box 1547
Big Bear Lake, CA 9231
sean.matlock@bvesinc.com

April 01, 2021

TABLE OF CONTENT

I. INTRODUCTION.....1

II. ACTIVITIES TIMELINE 2

III. MARKETING, EDUCATION, AND OUTREACH STRATEGY.....4

IV. COMPLIANCE AND SAFETY 7

V. PROGRESS TRACKING AND REPORTING 11

BEAR VALLEY ELECTRIC SERVICE, INC.

COVID-19 EMERGENCY CUSTOMER PROTECTIONS TRANSITION PLAN

Resolution M-4849

I. INTRODUCTION

Pursuant to Resolution M-4849, Bear Valley Electric Service, Inc. ("BVES") submits its Transition Plan ("Plan") on how it intends to ease customers off the Emergency Customer Protections ("Emergency Protections") established in Resolution M-4842. The Emergency Protections are scheduled to expire on June 30, 2021. BVES's Plan objectives are to provide an effortless and seamless transition for customers to manage their negative balance, become current on their bills, and to start the momentum for the State of California to recover from the pandemic. The objectives and principles of BVES's Plan are outlined below.

A. Transition Plan Objectives

- To reduce the apprehension of customers when the Emergency Customer Protections ends, BVES's plan has two objectives:

  1. To facilitate customers transitioning from a set of emergency protection programs to enrolling in programs that are already familiar to them but extended to manage their utility bills; and
  2. To utilize outreach strategies to inform customers about customer assistance programs and to enroll customers into programs designed to assist their bills and arrearage management.

B. Transition Plan Guiding Principles

- To ensure that the transition to the extended programs are effortless and seamless to customer experience;
- To ensure that the extended programs do not unwittingly create further financial constraints to customers;
- To involve stakeholders and customers at each step of the transition process; and
- To establish a structure that facilitates both BVES staff and customers to manage.

II. ACTIVITIES TIMELINE

Resolution M-4849 provides that "The IOUs' transition plans shall map out a timeline of activities associated with programs or initiatives that assist customers in bill management."

The activities timeline should include both (1) a timeline for the resumption of standard activities that BVES suspended due to the Emergency Protections activation and (2) a timeline for new activities that BVES will implement to provide a smooth transition for customers.

A. Summary of General Steps Mandated under Resolution M-4849

- **February 11, 2021** – Resolution M-4849 adopted by the Commission.
- **February 21, 2021** –Deadline for BVES to file Tier 1 Advice Letter demonstrating compliance with the extension of Emergency Protections to June 30, 2021.
- **February 25, 2021** – BVES submits draft Transition Plan Advice Letter to the Commission.
- **March 11, 2021** – BVES presents before the Low Income Oversight Board ("LIOB") its draft Transition Plan. .
- **April 1, 2021** – BVES files final Transition Plan Advice Letter that incorporate feedback from LIOB and the Commission.

B. Resumption of Disconnections for Non-Payment

- **90 days prior to Disconnection Policy Resumption Date (July 1, 2021)** – BVES will begin sending out notices to customers informing them that the utility will resume applying standard disconnection procedures under its tariffs. BVES will make every attempt to connect with potentially at risk customers. BVES will call each customer in the greater than 90 day past due bill category and attempt to make payment arrangements for each active account prior to July 1, 2021, based on its current payment arrangement practices. Payment terms include keeping active account current while making timely arrangement payments on a set schedule determined by the customer up to 12-months in length. i.e. weekly, bi-weekly or monthly payments.
- **Disconnection Policy Resumption Date on July 1, 2021** – BVES will begin resuming standard disconnection procedures i.e. process for bills that are delinquent past the due date and non-payment. BVES will individually reach out to impacted customers in the greater than 90 day past due bill category at risk of disconnection and offer an opportunity to participate in a payment arrangement plan prior to disconnection. If a customer is engaged in one of those types of payment assistance plans and the customer is making timely payments under that plan, the customer will not be disconnected.
- **Disconnection Policy Resumption Date on July 5, 2021 for non-payment** – BVES will reinstate its disconnection process for non-payment pursuant to standard disconnection procedures under its tariffs. All customer accounts that are not on payment plans at this

time will be subject to disconnection. Prior to any disconnection for non-payment, BVES provides notice to customers as outlined in its tariffs.

- Customer is sent a reminder notice approximately 15 days after receiving their original bill and due date (35 days total).
- If payment is not received by the 15th day, the customer receives a notice of termination which allows for an additional 10 calendar days before disconnection.

C. Resumption of Verification/Recertification of Eligibility for Assistance programs

- **April 2021 through June 2021** – BVES will begin sending out written notices to all applicable customers, i.e. CARE participants, customers on Life Support, informing them that BVES will resume applying the standard eligibility verification and recertification requirements under its tariffs after June 30, 2021.
- **July 1, 2021** – BVES will resume standard eligibility verification and recertification procedures for applicable customers.

D. Late Payment, Reconnection, or Other Customer Fees

- **April 2021 through June 2021** – BVES will roll out its public relations campaign on various media platforms to inform customers that COVID-19 related consumer protections will be expiring as of June 30, 2021 and customers are encouraged to call the BVES main office to arrange for a payment plan in advance of that date.
- **July 1, 2021** – BVES will resume applying standard late payment, reconnection, or other customer fees to customer accounts, if applicable.

E. Assistance Programs for Customers:

- BVES will identify all medical needs customer within both the 61-90 and greater than 90 day past due categories and set the payment plans up to 12 months in length if the customers wish to do so.
- BVES will also assist these customers with any available assistance funds such as San Bernardino County Low Income Home Energy Assistance Program (SB LIHEAP) to help restart debt recorded on their account and assure that these customers have applied for and are current with ESA, CARE, and/or medical baseline.
- When assisting a customer with a payment plan, BVES also evaluates, identifies, and informs customers of applicable other assistance programs organized by utilities, municipalities, state and federal agencies, for which the customer may be eligible. Such as the CARE program, Commission authorized forgiveness or arrearage programs, and the federal Low Income Home Energy Assistance ("LIHEAP") Program. BVES will also attempt to inform customers of applicable changes to available programs designed to financially assist customer such as Federal Pandemic Unemployment Compensation ("FPUC") is an emergency program established by the CARES Act to increase unemployment benefits for Americans who are out of work because of the COVID-19 pandemic.

BVES realizes that despite making every effort and allowing for generous payment plans, some customers will not pay their bills, such as allowing utility costs to stack up, which is akin to amassing compounding personal credit card debt. BVES also realizes the need to balance cost shifting between rate classes where one discount or special program is paid for by the remaining rate classes that are not participating in the program.

Although a very rare occurrence and under normal operating conditions, certain customers refuse to pay their bills and eventually the customer is disconnected for nonpayment and the debt is written off until such time that the customer tries to reestablish credit with the utility. Although BVES is reluctant to deviate from its normal operating practices, BVES realizes these are not normal conditions due to the pandemic and BVES is willing to write-off a very small subset of customer debt and keep service established if required to do so. BVES welcomes Commission recommendations on this matter.

Furthermore, BVES does not currently have debt forgiveness program. On February 11, 2021, the Commission opened Rulemaking No.("R") 21-02-014 "Order Instituting Rulemaking to Address Energy Utility Customer Bill Debt Accumulated During the COVID-19 Pandemic" to address arrearage forgiveness.

The purpose of R. 21-02-014 is to establish necessary special relief mechanism for customers (applicable to both low-income and non-low-income) who accumulated debt during the pandemic. BVES is respondent to this proceeding and will closely monitor any developments. BVES welcomes Commission recommendations on this matter and will conform to results of R. 21-02-014 as required.

III. MARKETING, EDUCATION, AND OUTREACH STRATEGY

Resolution M-4849 provides that IOUs shall include a coordinated, effective, and efficient strategy for their marketing, education, and outreach plan to engage and enroll customers in new bill management programs and inform currently enrollees about expiring protections.

The following Marketing, Education, and Outreach ("ME&O") Strategy supports the Transition Plan in effectively easing customers through a transition off of 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. When assisting a customer with a payment plan, BVES will also evaluate, identify, and inform customers of other assistance programs for which the customer may be eligible such as the CARE, and LIHEAP programs, etc. BVES will also attempt to inform customers of applicable changes to available programs designed to financially assist customer such as Federal Pandemic Unemployment

Compensation ("FPUC") is an emergency program established by the CARES Act to increase unemployment benefits for Americans who are out of work because of the COVID-19 pandemic.

Starting in April 2021, BVES will implement the following ME&O strategy:

- **April 2021 through June 2021** – BVES will roll out its public relations campaign on various media platforms to inform customers that COVID-19 related Emergency Protections will be expiring as of June 30, 2021 and customers are encouraged to call BVES to arrange for a payment plan in advance of that date.
- **April 2021** – BVES will contact each customer in the greater than 90-day timeframe past due bill list and attempt to make payment arrangements for each active account starting prior to July 1, 2021. Payment terms include keeping the customer active account current and making timely arranged payments on a set schedule determined by the customer.

A. ME&O Target Audiences

- The ME&O Strategy is intended to reach customers at large, with specifically targeted categories of customers as follows:
    - Customers enrolled in payment based arranged plans.
    - Customers with arrears for 61-90 days and greater than 90 days past due.
    - Customers with arrears and have medical needs.
    - Customers on assistance programs

BVES will identify all medical needs customers within both the 61-90 and greater than 90 day past due categories, to inform and provide them with the option to set the payment plans should the customers wish to do so, up to the maximum payment plan length of 12 months, unless otherwise requested by customers.

BVES will also evaluate, identify, and inform customers of other assistance programs – utility, municipal, State, or Federal – for which the customer may be eligible. BVES will also assist these customers with any available assistance funds such as CARE program and LIHEAP and ensure that customers have applied for and are current with the ESA, CARE, and medical baseline programs. When assisting customers with their bills, BVES will also attempt to inform customers of applicable changes to available programs designed to financially assist customer. For example, Federal Pandemic Unemployment Compensation ("FPUC") is an emergency program established by the CARES Act which increased unemployment benefits for Americans who are out of work because of the COVID-19 pandemic. Customer who recently lost their jobs may not be aware of this change.

B. ME&O Activities for All Customers

- As part of its ongoing efforts, BVES will continue to coordinate customer information with the local natural gas and water providers. For bill messaging, BVES plans to outline a defined path forward for its customers. BVES's

Transition Plan includes notifying consumer that protections are ending, customers are encouraged to call BVE to make payment arrangements prior to the expiration of the Emergency Protections, and provide information about assistance programs such as LIHEAP, CARE, and ESA. All BVES personnel will be trained regarding the requirements of the Transition Plan and how staff can help to coordinate efforts across utility providers. BVES is currently providing and will continue to provide all outreach information to its customers in both Spanish and English.

- BVES will leverage existing communications channels to educate and engage customers about the June 30, 2021 expiration of the Emergency Protections; programs available to help customers maintain service; electrical efficiency and rebate programs that can help customers use less electricity reducing their energy bill; and where necessary, information about the establishment of bill payment program.
- BVES commonly used communication tools include but are not limited to bill inserts, customer service talking points and training, phone message prompts which is automatically activated during welcome/on-hold messages, office signage, website notifications, social media, radio, and the local newspaper.

C. Targeted Outreach

- In addition, BVES will undertake proactive outreach to targeted customers. Tools may include the following, as appropriate:
    - Automated or manual phone calls that are targeted at specific audiences.
    - Emails or direct mail targeted at specific audiences.
- Targeted outreach will convey the following information, including but not limited to:
    - Commission information about pending changes to a customer's service or program enrollment status.
    - Needed customer actions, including re-certifications to remain eligible for programs.
    - Payment plans and options available to help customers maintain service or manage arrearages.
    - Bill assistance programs.
    - Applicability of late-payment, reconnection, and other fees to a customer.
    - Noticing of risk of disconnection.
    - Customer assistance options for Life Support.

D. Additional ME&O Activities and Tools

- Additional channels for customer communication and targeted outreach that may be undertaken by BVES include, but not limited to:

- Company web site.
- Social media.
- News releases to local media.
- Virtual community meeting.
- Direct contact at customer residence, i.e. door tags.
- Materials in multiple languages as required by the Commission.
- Advertising such as print, or social media.

E. Partnerships

- BVES works closely with City and County agencies, the Chamber of Commerce, stakeholders and organizations in the community on all matters including COVID-19, Public Safety Power Shutoffs, and Wildfire Mitigation. Coordination with stakeholders include but is not limited to disseminating BVES outreach materials, directing residents to BVES for information, and if appropriate consensual data sharing. BVES will continue its routine data sharing with other utilities related to low-income programs.
- BVES does not have any CCAs in its service territory

F. Incremental ME&O Costs

- At this time BVES does not request any incremental costs to comply with its proposed ME&O activities. BVES will strive to utilize existing authorized funds in implementation of its proposed ME&O activities as recommended in Resolution M-4849. Should additional funding be required, BVES will continue to record any incremental costs in its COVID-19 Pandemic Protections Memorandum Accounts ("CPPMA").

IV. COMPLIANCE AND SAFETY

Resolution M-4849 provides that BVES must explain in its Transition Plan Advice Letter how the transition plan maintains alignment with program enrollment targets, program eligibility requirements, and how customer protections in effect outside the COVID-19 Emergency Protections are aligned.

A. Alignment with Program Enrollment Targets and Requirements

- **Resolution M-4842 Background & Requirements:**
  - On March 19, 2020 and in compliance with Resolution M-4842 orders, BVES established Emergency Protections. The Emergency Protections requires

BVES to adopt the following actions, but not limited to, in order to protect customers from financial hardship during the pandemic:

- Waive deposits for all customers. In addition, BVES offers various payment plan options for its customers. BVES Customer Service personnel works closely with customers to determine a payment plan based on each individual needs and ability to pay.
- BVES paused review of CARE program eligibility, renewal, and recertification. BVES is suspending the removal of CARE participants due to their high usage of electricity. High Usage customers are flagged to be reviewed at a later date.
- BVES currently does not have community outreach contractors. Due to its small service territory, BVES does not have "hard-to-reach low-income" customers. BVES is currently building relationships with Community Based Organizations to help distribute information on BVES programs, e.g. CARE throughout the community. Since March 2020, BVES has encouraged newly eligible customers to sign up for CARE.
- BVES's ESA program contractor stopped treatment in March 2020. Treatment resumed in July 2020 by appointment only. The goal of BVES's ESA program is to inform customers about energy efficiency methods and provide measures to help and improve a customer home energy efficiency. BVES is available and able to deploy ESA treatment covered under BVES's ESA contractor's scope of work if emergency needs arise.
- In March 2020, following the Governor Declaration of State of Emergency, BVES posted its Emergency Protections on its website and at its local business office in Spanish and English. BVES communicates to its customers by email, news outlets, door postings at BVES office, and by social media to disseminate COVID-19 Emergency Protections information. Therefore, BVES believes it is in compliance with Section 8386(c)(16)(b).

B. BVES Results of Emergency Protections Requirements

BVES presents below the results of its compliance with Resolution M-4842. Table 1 provides the number of BVES customers who participated in the CARE program in 2019 and 2020 and includes those who have been recertified and new applicants. Table 2 shows the current number of BVES payment plans (plans that were fulfilled and plans where customers did not keep their payment plan obligation) and amount established in March 2020 to present. Table 3 provide the number of accounts and related dollar amount in the month of March 2020 that were delinquent between 60-90 days and greater than 90 days. Table 4 provide the number of accounts and related dollar amount in the month of February 2021 that were delinquent between 60-90 days and more than 90 days.

Table 1 – Number of Recertified and Newly Applied CARE Participants in 2019 - 2020 by Month

	CARE Recertification 2019	CARE Recertification 2020		CARE New Applications 2019	CARE New Applications 2020
January	50	41		37	29
February	36	45		33	17
March	47	42		30	31
April	69	65		25	38
May	62	41		28	17
June	70	32		56	16
July	39	57		26	35
August	65	89		25	86
September	66	65		19	28
October	46	60		30	11
November	40	32		27	10
December	59	48		22	14
Subtotal	649	617		358	332

The Grand Total number of recertified and new application of CARE participants for 2019 is 1,007, while it is 949 in 2020. Total CARE customers as of February 2021 is 1,786.

Table 2 – Total Number of BVES Payment Plans and Dollar Amount Established in March 2020 to Present

Count	Status	Dollar Amount
11	Active	$15,661.88
223	Broken (obligation not met)	$178,268.73

Table 3 - Aging Report as of March 2020 with Delinquent Accounts

Customer Class	Count	61-90 days	Past 90 days
Full-time Residents	3,973	$66,728	$154,025
Part-Time Residents	9,764	$46,247	$121,457
CARE Participants	1,202	$16,914	$41,708
Commercial	1,111	$20,138	$119,671
Total	**16,050**	**$150,027**	**$436,861**

Table 4 - Aging Report as of February 2021 with Delinquent Accounts

Customer Class	Count	61-90 days	Past 90 days
Full-time Residents	4,511	$53,768.88	$153,264.07
Part-Time Residents	8,118	$36,218.75	$103,020.64
CARE Participants	1,527	$13,224.30	$40,477.62
Commercial	984	$13,878.91	$116,293.45
Total	15,140	$117,090.84	$413,055.78

Table 5 – Number of Unique Accounts in Arrears (Greater than 90 days) not on Payment Plan

Past 90 days and not on Payment Plan	Number of Accounts
Below $250 arrearage	304
Over $250 arrearage	378
Total	682

C. Marketing Education and Outreach (ME&O):

Following the establishment of the Emergency Protections BVES expanded its notification program to customers and small businesses via the following channels:

- Website – BVES lists Emergency Protections on its website.
- Social Media – BVES posts content highlighting the emergency relief customer protections on Facebook at regular intervals.
- Customer Email/Newsletter – BVES disseminates by email, direct mail and in BVES's biannual newsletter, information regarding emergency relief customer protections.
- News Release/Media Advisory – BVES issues a media advisory to local media outlets regarding the Emergency Protections available to consumers.
- Community Outreach – BVES makes available copies of its disaster protection plan, which is posted at its office door.
- Customer Ambassadors/Employees – BVES develops and issues detailed information regarding the Emergency Disaster Relief Protections program to employees so they are knowledgeable to answer any questions from customers specifically regarding COVID-19.
- Outreach to Low-Income Customers – BVES continues to include information regarding emergency relief protections to all of its customers including those enrolled in the CARE program.

In addition, BVES has reached out to customers who are directly impacted by the Emergency Protections event by:

- Targeted Outreach to Impacted Customers – BVES will attempt to contact impacted customers by the Interactive Voice Recognition (IVR) system or two-way text communications.
- Local Governments – BVES will alert the City of Big Bear Lake and the County of San Bernardino via email and/or by telephone regarding emergency relief protections available to customers.
- Outbound Dialing – BVES will utilize its IVR system to place outbound emergency relief calls during an event.
- Customer Contact Center – BVES's (800) 808-2837 phone number will be made available 24/7 during a state of emergency to provide information to customers regarding service.

Furthermore, BVES has received very little feedback from customers regarding COVID-19 protections. It is likely that many customers may be expecting some sort of debt relief from the State of California or many accounts have simply become inactive or are now out of business due to the pandemic.

C. Ensuring That Activities Are Safe and Consistent with All Appropriate State and Local Health Orders

- BVES's Plan does not conflict with other established company programs such as CARE or other State and Local Health ordinances.
- Protected customers have the same responsibility to pay for their share of the Commission authorized tariff as do all customer classes. BVES will give each customer class the opportunity to bring their account current through a lengthy payment plan and will continue to wave deposits for customers who are still struggling through the Transition Plan timeline and beyond.

V. PROGRESS TRACKING AND REPORTING

Resolution M-4849 provides that "IOUs must include a plan for reporting progress on activities in the timeline and present metrics they will track and report to monitor success in achieving the goal of effectively easing customers through a transition off of Emergency Customer Protections by proactively enrolling customers in programs to manage their utility bills and informing relevant customers of the changes to programs in which they are already enrolled. Reporting frequency shall be monthly and the first report shall include baseline data associated with progress metrics…Energy IOUs shall report these progress metrics monthly by including them in the monthly report required by the Disconnections Proceeding, R.18-07-005."

A. Background and Protocols for Progress Tracking and Reporting

- BVES will track the progress of the transition efforts starting April 2021 and beyond. It is likely some customers may choose to contact BVES before the June 30th deadline and enter into a voluntary payment plan. Should a customer contact BVES, the customer may take advantage of a payment arrangement up to 12-months in length. Customer may request shorter length. It is not BVES's intention to disconnect any customers without giving them proper time and opportunity to fulfill their payment obligation.
- BVES will report these metrics in its monthly report required by R.18-07-005.

B. Metrics to Track Continued Enrollment in Bill Assistance Program

- BVES will provide the following metrics to track customers who are enrolled in a CARE bill assistance program when Emergency Protections were in place and who are successful in sustaining their enrollment in the CARE program if they still meet eligibility criteria.
  - Number and percentage of newly enrolled customers who are able to stay on BVES's CARE program post June 30, 2021.
  - Number and percentage of customers required to take actions to remain on BVES's CARE programs and are successfully recertified.

C. Metrics to Track Enrollments of Impacted Customers in New Payment Programs

- BVES will provide the following metrics to track enrollment of impacted customers in new noted programs.
  - Number and percentage of customers enrolled in alternative payment arrangements, which are defined as enrollment in an amortization agreement, alternative payment schedule, or a plan for deferred or reduced payment.
  - Number of payment plans created, active, and unmet obligation, by payment plan length.
  - Number and percentage of customers who are disconnected.
  - Change in arrearage amounts.
  - Number of BVES customer calls concerning alternative payment arrangements.
  - Number of customers enrolled in LIHEAP, CARE, and ESA program.