
April 13, 2021

ADVICE 241-G-A/4460-E-A
(U 338-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Supplement to Advice 241-G/4460-E, Southern California Edison Company's Transition Plan for the Expiration of Emergency Customer Protections Related to the COVID-19 Pandemic

PURPOSE

Southern California Edison (SCE) hereby submits this supplemental advice letter to update Section II.C.4 in the Tier 2 Advice Letter (AL) pursuant to Ordering Paragraph (OP) 5 of Resolution M-4849 (Resolution). This advice letter supplements Section II.C.4 in the original Advice 241-G/4460-E.¹

BACKGROUND

On March 4, 2020, Governor Newsom declared a State of Emergency related to the COVID-19 pandemic² and followed up on March 19, 2020 with an executive order for Californians to shelter in place except to meet essential needs.³ In response, on April 16, 2020, the California Public Utilities Commission (Commission or CPUC) ratified Resolution M-4842, Emergency Authorization and Order Directing Utilities to Implement Emergency Customer Protections to Support California Customers During the COVID-19 Pandemic. Specifically, Resolution M-4842 ordered the utilities to submit Tier 2 advice letters describing all reasonable and necessary actions to implement the Emergency Customer Protections and set an end date for the Emergency Customer Protections as April 16, 2021.

¹ These changes are made in accordance with General Order (GO) 96-B, General Rule 7.5.1, which authorizes utilities to make additional changes to an advice letter through the submittal of a supplemental advice letter.

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

On May 1 and May 27, 2020, SCE submitted Advice 233-G/4205-E and 233-G-A/4205-E-A, respectively, to describe all reasonable and necessary actions to implement the Emergency Customer Protections for Residential and Small Business Customers during the COVID-19 pandemic. In addition, SCE requested establishment of the COVID-19 Pandemic Protections Memorandum Account (CPPMA) to track incremental costs associated with complying with Resolution M-4842. On February 11, 2021, the CPUC approved Resolution M-4849, which extended the Emergency Customer Protections to June 30, 2021 and ordered the creation of transition plans to facilitate a smooth transition for customers when the Emergency Customer Protections expire.⁴

In this AL, SCE complies with OP 5 of Resolution M-4849 by including: (1) a timeline of new start and resumed activities, (2) a marketing, education, and outreach (ME&O) strategy, (3) an explanation of the activities' timeline and ME&O strategy for compliance and safety, and (4) a progress tracking and reporting plan. The goal of this transition plan is to proactively engage customers on programs to manage their utility bills and inform customers of relevant changes to programs in which those customers are currently enrolled.

On April 1, 2021, pursuant to Resolution M-4849, SCE submitted Advice 241-G/4460-E.

DISCUSSION

SCE discovered an inadvertent error in the number of residential and Small Business customers that would receive direct mail communication within its Marketing, Education, and Outreach section. SCE supplements Advice 241-G/4460-E with the redlines below to the section to correct the error and provide the latest available information. As a result of the updates to the number of customers that would receive the direct mail and with a continued focus on providing customers with the best customer experience, SCE has also increased the number of weeks to stagger the mailings. This will limit call volumes to SCE's Customer Call Center and allow for greater attention to be placed on each individual customer that contacts SCE.

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

C. Implementation and Community Outreach

4. Direct Mail

Similar to the outbound emails, SCE intends to use utilize direct mail to provide residential and Small Business Customers who are more than 60 days in arrears with a communication regarding the June 30, 2021 end of Emergency Customer Protections and the list of available assistance programs. However, unlike the unique customization to the individual customer in the email, the direct mail communication will only vary

⁴ Resolution M-4849, OP 5.

depending on whether the customer is a residential or Small Business Customer. As of ~~mid-March~~ **April 10**, 2021, SCE estimates that approximately ~~40,000~~ **478,000** residential and Small Business Customers will receive a direct mail communication.⁵ Due to the large number of potential customers receiving the direct mailer and to provide the best customer experience, SCE intends to allocate the mailing dates over the first ~~two~~ **three** weeks of May.⁶ This will help mitigate potential delays in call times that can be frustrating to customers during those times when the call center may have high call volumes.

SCE intends to provide a brochure that contains the same lead questions on SCE's webpage. In each section of the brochure, the customer would be notified of programs that help their specific situation. The brochure will include the relevant webpages as well as the contact phone number for the customer to receive additional information or enroll in the programs. Also included will be information regarding how to recognize scams that may be targeting utility customers. Finally, the envelope for the brochure will be customized to stand apart from other mailings and will feature the words "Keep Getting the Financial Assistance You Need" so that customers are aware of the contents.

SCE will also be sending a separate letter to customers who are eligible for AMP, which will also be sent in staggered batches to provide customers with the best customer experience when calling into the call center. The letter will notify the customer of eligibility requirements to enroll in AMP, basic information regarding the program, and include both the website as well as the phone number to be used for enrollment or to receive additional information. SCE commits to sending all AMP eligible customers this letter prior to the end of Emergency Customer Protections.

TIER DESIGNATION

Pursuant to OP 5 of Resolution M-4849, SCE submits this supplemental advice letter with a Tier 2 designation, the same tier designation as Advice 241-G/4460-E.

EFFECTIVE DATE

This advice letter will become effective on May 1, 2021, the effective date of the original advice letter, Advice 241-G/4460-E.

PROTESTS

SCE asks that the Commission, pursuant to GO 96-B, General Rule 7.5.1, maintain the original protest and comment period designated in Advice 241-G/4460-E and not reopen the protest period. The modifications included in this supplemental advice letter

⁵ Based on residential and Small Business Customers more than 60 days in arrears.

⁶ **SCE projects the mailing would be completed by May 21, 2021.**

do not make substantive changes that would affect the overall evaluation of the advice letter.

NOTICE

In accordance with General Rule 4 of GO 96-B, SCE is serving copies of this advice letter to the interested parties shown on the attached Gas and Electric GO 96-B and the R.18-03-011, A.14-11-007, A.15-02-001, A.19-11-003, A.20-03-014, R.15-03-010, R.18-07-006, R.18-07-005, R.12-06-013, and A.19-09-014 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-3719. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

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

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

Southern California Edison Company

/s/ Gary A. Stern
Gary A. Stern, Ph.D.

GAS:el:cm
Enclosures



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.:

Utility type:

ELC GAS WATER
 PLC HEAT

Contact Person:

Phone #:
E-mail:
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

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

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

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

Confidential treatment requested? Yes 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 No

Requested effective date:

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 proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

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:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	