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April 1, 2021

ADVICE LETTER 3729-E / 2967-G
(U902-M)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**SUBJECT: FILING ESTABLISHING THE RESIDENTIAL AND SMALL BUSINESS
CUSTOMER TRANSITION PLAN PURSUANT TO RESOLUTION M-4849**

San Diego Gas & Electric Company (SDG&E) hereby submits this advice letter for approval to the California Public Utilities Commission (Commission) of its Residential and Small Business Customer Transition Plan as shown in Attachment A.

PURPOSE

Pursuant to Ordering Paragraph (OP) 5 of Resolution M-4849, approved on February 11, 2021, SDG&E is filing this advice letter (AL) to establish its Transition Plan for the expiration of COVID-19 Emergency Customer Protections for Residential and Small Business Customers.

BACKGROUND

In 2019, with Decision (D.) 19-07-015, the Commission implemented an Emergency Disaster Relief Program and established a set of minimum emergency disaster customer protection measures that the utilities are directed to implement in the event of a declared emergency.

On March 4, 2020, Governor Gavin Newsom proclaimed a State of Emergency in response to the outbreak of novel coronavirus, COVID-19.¹ On March 13, 2020, President Trump signed an Emergency Declaration to facilitate federal response to the emerging pandemic.²

On March 13, 2020, as an initial response to the developing crisis, SDG&E implemented a voluntary moratorium on all disconnections of service for non-payment.

¹ See Office of Governor Gavin Newsom, *Governor Newsom Declares State of Emergency to Help State Prepare for Broader Spread of COVID-19* (March 4, 2020), available at <https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-help-state-prepare-for-broader-spread-of-covid-19/>.

² See National Conference of State Legislatures, *President Trump Declares State of Emergency for COVID-19* (March 25, 2020), available at <https://www.ncsl.org/ncsl-in-dc/publications-and-resources/president-trump-declares-state-of-emergency-for-covid-19.aspx>.

On March 17, 2020, the Commission's Executive Director sent a letter to the California energy, water and communications corporations stating the Commission's expectation that they should "extend the same applicable consumer protections directed in D.19-07-015" to utility customers due to the COVID-19 pandemic, retroactive to March 4, 2020.³

On March 19, 2020, pursuant to direction from the Executive Director as well as D.19-07-015, SDG&E submitted AL 3516-E/2854-G, implementing its emergency disaster relief program for customers impacted by the COVID-19 pandemic.

On April 16, 2020, the Commission adopted Resolution M-4842 to ratify the directions provided in the Commission's Executive Director's March 17, 2020 letter. Resolution M-4842 provided that the applicable protections would remain in place for one year, through April 16, 2021, or as otherwise extended.

On May 1, 2020, consistent with M-4842, SDG&E submitted Supplemental Advice Letter 3516-EA/2854-G-A to describe the full suite of protections it was offering its customers, explain which customer protections were inapplicable during the COVID-19 pandemic, and to confirm the costs to be tracked in the COVID-19 Pandemic Protections Memorandum Account (CPPMA).

On February 11, 2021, the Commission approved Draft Resolution M-4849, directing the utilities to extend the emergency customer protections through June 30, 2021, and to separately file a Tier 2 AL with transition plans for the expiration of the COVID-19 Emergency Customer Protections by April 1, 2021.

DISCUSSION

SDG&E respectfully submits this Transition Plan for the expiration of the COVID-19 Emergency Customer Protections of residential and small business customers on June 30, 2021 for approval pursuant Resolution M-4849. The full Transition Plan is included here within Attachment A.

As stated in Resolution M-4849, the goal of SDG&E's Transition Plan is to proactively enroll customers in programs to manage their utility bills, inform relevant customers of the changes to programs to which they are enrolled and potentially qualify, and to effectively ease customers through a transition off of the COVID-19 Emergency Customer Protections.

SDG&E's Transition Plan includes a discussion of resumed customer credit, collections, and customer program administration activities, SDG&E's marketing, education, and outreach strategy, an explanation of how the plan accounts for compliance and safety and a progress tracking and reporting plan.

In developing its Transition Plan, SDG&E coordinated with other utilities across California, the Low Income Oversight Board (LIOB), the Commission's Energy Division and Community Based Organizations (CBOs) in our service territory in order to establish a comprehensive plan designed to help customers be successful in their transition to an environment without COVID-19 Emergency Customer Protections.

³ March 17, 2020 Letter from Alice Stebbins Re: Emergency Customer Protections to Support Customers Affected by the COVID-19 State of Emergency.

EFFECTIVE DATE

SDG&E believes this submittal is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B. SDG&E respectfully requests that this submittal be effective on May 1, 2021 which is 30 days from the date of this filing.

PROTEST

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received no later than April 21, 2021, which is 20 days after the date this Advice Letter was submitted with the Commission. There is no restriction on who may submit a protest. The address for mailing or delivering a protest to the Commission is:

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

Copies of the protest should also be sent via e-mail to the attention of the Energy Division at EDTariffUnit@cpuc.ca.gov. A copy of the protest should also be sent via e-mail to the address shown below on the same date it is mailed or delivered to the Commission.

Attn: Greg Anderson
Regulatory Tariff Manager
E-mail: GAnderson@sdge.com and SDGETariffs@sdge.com

NOTICE

A copy of this submittal has been served on the utilities and interested parties shown on the attached list, including interested parties in 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, by providing them a copy hereof either electronically or via the U.S. mail, properly stamped and addressed.

Address changes should be directed to SDG&E Tariffs by email to SDGETariffs@sdge.com.

/s/ Clay Faber

CLAY FABER
Director – Regulatory Affairs



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:

General Order No. 96-B
ADVICE LETTER SUBMITTAL MAILING LIST

cc: (w/enclosures)

Public Utilities Commission
CA. Public Avocates (CalPA)
R. Pocta
F. Oh
Energy Division
M. Ghadessi
M. Salinas
L. Tan
R. Ciupagea
Tariff Unit
CA Energy Commission
B. Penning
B. Helft
Advantage Energy
C. Farrell
Alcantar & Kahl LLP
M. Cade
K. Harteloo
AT&T
Regulatory
Barkovich & Yap, Inc.
B. Barkovich
Biofuels Energy, LLC
K. Frisbie
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S. Blasing
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California Farm Bureau Federation
K. Mills
California Wind Energy
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Energy Policy Initiatives Center (USD)
S. Anders
Energy Regulatory Solutions Consultants
L. Medina
Energy Strategies, Inc.
K. Campbell
EQ Research
General
Goodin, MacBride, Squeri, & Day LLP
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J. Squeri
Green Charge
K. Lucas
Hanna and Morton LLP
N. Pedersen
JBS Energy
J. Nahigian
Keyes & Fox, LLP
B. Elder
Manatt, Phelps & Phillips LLP
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J. Leslie
Morrison & Foerster LLP
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MRW & Associates LLC
General
NLine Energy
M. Swindle
NRG Energy
D. Fellman
Pacific Gas & Electric Co.
M. Lawson
M. Huffman
Tariff Unit
RTO Advisors
S. Mara
SCD Energy Solutions
P. Muller
Shute, Mihaly & Weinberger LLP
O. Armi
Solar Turbines
C. Frank
SPURR
M. Rochman
Southern California Edison Co.
K. Gansecki
TerraVerde Renewable Partners LLC
F. Lee
TURN
M. Hawiger
UCAN
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Service List(s)
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

Attachment A

SDG&E Transition Plan for the expiration of the COVID-19 Emergency Customer Protections

Background

With Decision (D.) 19-07-015, the Commission implemented an Emergency Disaster Relief Program and established a set of minimum emergency disaster customer protection measures that utilities are directed to implement in the event of a declared emergency. In response to the COVID-19 pandemic, on April 16, 2020, the Commission issued Resolution M-4842 (Resolution) directing the utilities to implement applicable protections established in the Emergency Disaster Relief Program for residential and small commercial customers for one year through April 16, 2021 (herein “COVID-19 Emergency Customer Protections” or “Customer Protections”). San Diego Gas & Electric Company (SDG&E) implemented the applicable emergency customer protections as required by the Resolution, in addition to describing additional discretionary measures, through an approved advice letter.¹ On February 11, 2021, the Commission approved Resolution M-4849, directing the utilities to extend the COVID-19 Emergency Customer Protections currently in effect through June 30, 2021, and to separately develop a Transition Plan to prepare for the expiration of the COVID-19 Emergency Customer Protections for their residential and small commercial customers.

The goal of SDG&E’s Transition Plan is to educate customers about the transition process and proactively encourage customers to enroll in programs for which they are eligible to help manage their energy bills. SDG&E’s Transition Plan intends to inform relevant customers of the changes to programs in which they are enrolled or potentially qualify, and effectively ease customers through a transition prior to the expiration of COVID-19 Emergency Customer Protections.

SDG&E’s Transition Plan includes a marketing, education, and outreach strategy; the timeline of resumed customer credit and customer program administration activities; a statement of how the plan accounts for compliance and safety; the collaboration efforts with stakeholders (including a table outlining SDG&E’s consideration of the feedback provided by the Low-Income Oversight Board (LIOB)); and a progress tracking and reporting plan.

In developing this Transition Plan, SDG&E coordinated with other utilities across California, the LIOB, and the Energy Division (ED).

SDG&E also notes the ongoing evolution of the COVID-19 pandemic, which may require additional changes or adaptations to this Transition Plan. The Commission has also instituted a proceeding considering “the necessity of establishing special relief mechanism(s) for customers who could not pay their energy bills during the COVID-19 pandemic to give them a better

¹ See SDG&E Advice Letter 3516-E-D/2854-G-D, approved June 16, 2020 and effective March 19, 2020.

chance of becoming current on their energy bills.”² This ongoing proceeding may impact the Emergency Customer Protections and/or the operation of this Transition Plan. Accordingly, SDG&E intends to adapt this Transition Plan as necessary to meet any applicable changes, including any new directives by the Commission.

CURRENT COVID-19 EMERGENCY CUSTOMER PROTECTIONS

On February 22, 2021, as directed by Resolution M-4849, SDG&E submitted Advice Letter 3699-E/2954-G to extend the applicable COVID-19 Emergency Customer Protections through June 30, 2021. The table below illustrates the protections available to residential and small business customers until June 30, 2021.

Table 1: Overview of Customer Protections

Customer Protections³
Waive deposit requirements for residential and small commercial customers seeking to reestablish service.
Implement payment plan options for residential customers and small business.
Suspend disconnection for nonpayment and associated fees, and late fee requirements for residential and small commercial customers.
Support low-income residential customers by: <ul style="list-style-type: none"> (a) freezing all standard and high-usage reviews for the California Alternate Rates for Energy (CARE) program eligibility; (b) contacting all community outreach contractors, the CBOs who assist in enrolling hard-to-reach low-income customers into CARE, to provide information to 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 (ESA) program can be deployed to assist customers.

² R. 21-02-014. The COVID-19 Bill Debt OIR is on an accelerated schedule and the Commission expects a final decision by June 24, 2021. SDG&E will incorporate any newly adopted Commission proposals, programs, or payment plans into its transition plans, if directed, once a final decision is issued.

³ See SDG&E Advice Letter 3699-E/2954-G.

Customer Protections³
Suspend all CARE and Family Electric Rate Assistance (FERA) program removals to avoid unintentional loss of the discounted rate during the period for which the customer is protected under these customer protections.
Discontinue generating all recertification and verification requests that require customers to provide their current income information.
Include these customer protections as part of their larger community outreach and public awareness plans under Section 8386(c)(16)(b).
Meet and confer with the CCAs as early as possible to discuss their roles and responsibilities for each emergency customer protection.

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

At a high level, SDG&E’s Transition Plan ME&O strategy begins with outreach to customers at least 60 days (about 2 months) prior to the resumption of collection activities and notifications. This ME&O strategy will continue through two billing cycles, allowing customers time to enroll in bill payment assistance programs, establish payment options, and otherwise take steps to help manage their energy bills.

Below, SDG&E provides more detail on ME&O strategies for customer segmentation, tactical plans, outreach, and coordination efforts.

Customer Segmentation

Prior to the end of COVID-19 Emergency Customer Protections, SDG&E intends to communicate with customers in its entire service territory with general market tactics that reach all customers, as well as more targeted messaging to specific subsets of customer groups, such as CARE and FERA customers, those that are significantly behind on their payments, or those that would otherwise be considered a vulnerable class of customers.

SDG&E will target communications to residential customers based on current program participation or estimated eligibility (i.e., CARE versus non-CARE, Medical Baseline, etc.), including those with access and functional needs, and with a heavy focus on customers who are overdue and not participating in SDG&E’s income-based programs. For example, one customized segment of customers would be Non-CARE customers in arrears. Customized communication to these customers would offer information on various assistance programs like CARE and FERA, to help them reduce financial hardship. Cross promotion of other programs, like ESA, Medical Baseline, the Arrearage Management Payment (AMP) plan, and the Low-Income Home Energy Assistance Program (LIHEAP) will align these customers with relevant

assistance offerings.⁴ As possible, additional Access and Functional Needs (AFN) customer segments such as temperature sensitive and Limited English Proficient (LEP) customers will be prioritized for marketing and/or outreach to help raise awareness among vulnerable customer groups about the end of customer protections.

Similarly, SDG&E's Transition Plan ME&O for small business customers will offer payment plan options as well as any programs available to promote energy management and conservation.

ME&O Tactical Plan

SDG&E's Transition Plan ME&O strategy will include a mix of general market tactics for broad awareness and more targeted communications to impacted customers, as described previously and in more detail below. Customer outreach and messaging will vary for residential and small business customers and will primarily focus on program eligibility and specific customer options aimed at helping the customer with energy bills and energy use management. Primary messages will focus on changes to customer protections by audience with key dates, while secondary messages will provide information on programs and payment plans available to help customers manage arrears and avoid service disconnection. Communications will be provided in English and Spanish, where possible. SDG&E's communication plan will begin two bill cycles, or 60 days (about 2 months), prior to lifting the COVID-19 Emergency Customer Protections and prior to the resumption of credit activities. Proposed Transition Plan ME&O activities include:

- Sending up to two direct mail letters or emails to the most impacted residential customers regarding the end of Customer Protections, available assistance programs, and financial assistance options (60 days and 30 days out);
- Communicating the end of Customer Protections in the SDG&E bill package (insert and/or onsert messages);
- Updating the SDG&E website to communicate the upcoming end of Customer Protections on the SDG&E homepage, MyAccount, and relevant program pages (CARE, FERA, AMP, Medical Baseline, COVID-19, Assistance), as well as the actual sunset of these protections absent extension by the Commission;
- Communicating the end of Customer Protections through SDG&E's social media channels (Twitter, Facebook) using geo-targeting and neighborhood-specific platforms like Nextdoor;
- Communicating secondary messaging regarding the end of Customer Protections in current CARE letters and emails (such as the monthly bill comparison letter);

⁴ Additionally, pursuant to D.20-06-003, available benefit programs will be offered to residential customers who contact SDG&E before disconnection activities resume. Customers who contact SDG&E will have two billing cycles to enroll in any programs prior to disconnection.

- Providing talking points and collateral in English and Spanish for CBOs and other community partners who work with the most at-risk and/or vulnerable populations;
- Providing talking points in English and Spanish to industry and trade, non-profits, and other community and business organizations who work with small commercial customers;
- Updating credit and collection notices to inform customers there may be financial programs available to assist them (consistent with the requirements set forth in D.20-06-003);
- Updating CARE and FERA program acceptance notifications to cross-promote other assistance offers, such as AMP;
- Posting a NewsCenter story through SDG&E Media Communications that explains the end of Customer Protections and points to resources for customers; and
- Developing talking points for SDG&E's Customer Care Center and Interactive Voice Response (IVR).

Outreach & Coordination

SDG&E's marketing and customer outreach tactical plan also includes coordination with other agencies such as 2-1-1, LIHEAP, and CBOs, and other energy and water utilities. In addition, SDG&E will continue to leverage partnerships with SDG&E's Energy Solutions Partner Network, which consists of 190 diverse and grassroots community-based organizations, including non-profits, Chambers of Commerce, and business trade associations, reaching both residential and non-residential customers. SDG&E will strategically identify the Energy Solutions Partners who reach customers with access and functional needs including low income, senior, multilingual/multicultural demographics, as well as small business customers to provide Customer Protections messaging through monthly social media messaging, virtual presentations, and meetings.

Operational Plan for Credit & Collection Activities

SDG&E is developing a comprehensive timeline to support customers prior to and during the transition of resumed and new credit activities once the COVID-19 Emergency Customer Protections are lifted that will include additional details on available benefit programs. The plan includes the comprehensive and targeted Transition Plan ME&O plan (outlined above) to educate residential and small business customers regarding available options which will start as early as May 1, 2021, in advance of the COVID-19 Emergency Customer Protections being lifted. SDG&E will offer various bill payment options, such as extended payment arrangements for residential customers and the AMP Plan, which went live on February 1, 2021 for eligible

residential CARE and FERA customers, and is available to reduce or eliminate past due balances through debt-forgiveness.

Resumed and New Credit Activities Plan

Upon conclusion of the COVID-19 Emergency Customer Protections, SDG&E will resume the activities summarized below with additional detail provided in subsequent sections:

- A. Late noticing to all customers would resume after the Customer Protections end.
- B. Residential disconnections for non-payment would resume, limited by the disconnection cap established in D.20-06-003 (3% for SDG&E), SDG&E's ability to handle customer calls, and the other safety nets for customers.
- C. Small business disconnections for non-payment would resume after the Customer Protections end.
- D. Late payment charges for small business customers would resume one-month after Customer Protections end.
- E. Deposit requests for small business customers would resume two months after Customer Protections end.
- F. Continue assisting residential customers with reasonable payment arrangements, with terms extending up to 12-months as needed, per D.20-06-003.
- G. Offer and enroll eligible residential CARE or FERA customers in AMP to help reduce past due balances through debt-forgiveness, subject to eligibility.

A. Timing for Start of Collection-Related Activities

Since the COVID-19 Emergency Customer Protections period is currently projected to end on June 30, 2021, SDG&E is planning to resume certain collection activities on July 1, 2021. SDG&E is currently undergoing its Customer Information System (CIS) implementation that will go live on April 5, 2021. After April 5, SDG&E's new system must undergo a stabilization period, during which operational changes will create instability or uncertainty in the new system. SDG&E has endeavored to successfully implement its generational CIS replacement, and preserving a reasonable stabilization period is necessary for a seamless customer experience and to reduce the potential for errors. Therefore, depending on the status of the CIS implementation and stabilization period, SDG&E may be forced to delay to the resumption of credit activities/disconnections as described until the CIS is stable and/or manually implement the some of the initiatives described herein. The dates below remain the *earliest possible dates* for the listed credit activities. The activities that are expected to begin on July 1, 2021 include the issuance of a late bill late notice for residential and small business customers (Late Notice).⁵ The Late Notice has been revised to notify customers that there may be financial assistance programs available, such as CARE, ESA, and AMP, consistent with the requirements established in D.20-

⁵ SDG&E's request for payment of past due bill also known as the 15-day past-due notice.

06-003. As discussed in the previous section, SDG&E will begin its Transition Plan ME&O communications at least 60 days before June 30, 2021. SDG&E's Customer Care Centers will be ready to respond to an increased customer need. Self-service options will be available to help customers check account balances, set payment arrangements, and make payments.

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

As discussed, SDG&E currently expects to formally lift the Emergency Customer Protections and initiate collection activities for residential customers beginning July 1, 2021. Table 2 outlines the earliest date for each resumed activity. As illustrated in Table 2, for customers that receive a Late Notice on July 1, 2021, the earliest possible date a customer could be disconnected for nonpayment would be August 23, 2021. This effectively translates into an additional 54 days (July 1 to August 22) that SDG&E residential customers are protected from disconnection for nonpayment. Along with the mandated notices, medical baseline and low income customers also have additional touch points to inform them of possible assistance and the pending disconnection.

Additionally, D.20-06-003 provides additional protections that could further extend disconnections for nonpayment for some customers. Customers with an arrearage that contact SDG&E will be offered enrollment into applicable benefit programs. Furthermore, D.20-06-003 prevents SDG&E from disconnecting residential customers if the customer (1) has a LIHEAP Pledge pending; (2) is on a payment arrangement and is current on both monthly bills and the payment arrangement; (3) is participating in AMP and is current on current months bills; (4) qualifies for medical baseline and agrees to a payment arrangement; or (5) if temperatures are forecasted to be above 100-degrees or below 32-degrees on a 72-hour look ahead.

SDG&E will also be resuming disconnections for nonpayment subject to the disconnection cap established in D.20-06-003. SDG&E's disconnection cap is 3% of customers annually, with a monthly rolling methodology for calculating the number of disconnections permitted in a month within the annual cap. So, while SDG&E could theoretically disconnect up to 3% of its residential customers following the end of customer protections, the cap serves as a check on any massive disconnection event.⁶ The monthly rolling methodology essentially establishes a roughly proportional disconnection rate over the course of 12 months. Thus, SDG&E does not foresee or intend a disproportional disconnection rate or a sudden disconnection "waterfall" simply because disconnections have resumed. SDG&E plans to begin disconnecting residential customers for non-payment at a rate similar to its historical monthly average disconnection volumes each month and to remain compliant with the annual 3% disconnection cap.

⁶ Due to the rolling 12-month methodology (D.20-06-003), if SDG&E conduct did a massive disconnection event equal to 3% of its residential customers, it would not be possible to disconnect any additional residential customers for the following 11 months.

Table 2: Estimated Earliest Possible Date for Collection Activities (Residential)

Activity	Earliest Possible Date
Credit Activity – Late Notice – (no disconnections)	July 1, 2021
Credit Activity – full credit cycle beginning with Late Notice	August 1, 2021
Final Call disconnection notice (48-hour notice)	August 12, 2021
Earliest date a customer can be disconnected for non-payment	August 23, 202

C. Residential Customer Payment Arrangements

In compliance with D.20-06-003, extended 12-month payment arrangements are currently offered when a customer expresses an inability to pay. As a result, there is no change to the length of available payment arrangements since extended payments arrangements are the default offering for residential customers. However, if a customer prefers a shorter payment agreement they may elect one.

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

As discussed, SDG&E currently expects to formally lift the disconnection moratorium and resume credit activities for small business customers beginning July 1, 2021. Table 3 outlines the earliest date for each of the resumed activities. As illustrated in Table 3, for customers that receive Late Notice on July 1, 2021, the earliest possible date a customer could be disconnected for nonpayment would be August 23, 2021. This effectively translates into an additional 54 days (July 1 to August 22) that SDG&E small business customers are protected from disconnection. SDG&E will resume charging the Delayed Payment Charge as early as August 2, 2021.

Table 3: Estimated Earliest Possible Date for Resuming Collection Activities (Small Business Customer)

Activity	Earliest Possible Date
Credit Activity – Late Notice – (no disconnections)	July 1, 2021

Credit Activity – full credit cycle beginning with Late Notice.	August 1, 2021
Final Call disconnection notice (48-hour notice)	August 12, 2021
Earliest date a customer can be disconnected for non-payment	August 23, 2021

E. Start of Deposit Requirements for Small Business Customers

On September 1, 2021, SDG&E will reinstate deposit requirements for eligible small business customers during the move-in process. SDG&E will reinstate deposits for re-establishment requirements no earlier than August 1, 2021. Pursuant to D.20-06-003, deposits for residential customers are prohibited, so deposits will not be reinstated for residential customers.

Table 4: Estimated Earliest Possible Date to Reinstate Deposit Review for Small Business Customers

Activity	Earliest Possible Date
Deposit Review for Small Business Customers	September 1, 2021

F. Update to Payment Arrangements for Small Business Customers

SDG&E will continue to offer extended payment arrangements for Small Business customers for a period of time after the Emergency Customer Protections end.

Operational Plan for CARE and FERA Customers

Recertification

The recertification process for CARE and FERA is such that there is an “anniversary date” that triggers a recertification notice for program participants 90 days prior to the actual recertification deadline. This 90-day notice provides ample time for customers to complete the recertification process and for SDG&E to conduct outbound telephone recertification campaigns to support customers through the process. In addition, program participants receive a 60-day reminder notice and a final 30-day reminder notice is printed on the last customer bill where the discount is applied.

When the Customer Protections went into place, recertifications were halted and no further notices were sent. Upon the expiration of the COVID-19 Emergency Customer Protections, SDG&E will launch the abovementioned recertification process for CARE and FERA customers with the first notice delivered on July 1, 2021. The recertification process will restart and continue to be based on the customer's existing anniversary date. Any customers who were not required to recertify while Customer Protections were in place, will be recertified at their next anniversary date. For example, if a customer has an anniversary date of May 1, 2021 the customer will not be required to recertify due to protections and will instead receive the 90-day notice the next year on January 31, 2022, with a recertification deadline of May 1, 2022.

Since SDG&E will not send recertification notices until July 1, 2021, customers with an anniversary date between July 1, 2021 and September 30, 2021 will have their anniversary date extended to allow adequate time to receive recertification notification notices and to complete the 90/60/30-day recertification process described above. For example, if a customer has an anniversary date of July 1, 2021 the anniversary date would be extended to October 1, 2021 allowing for the 90-day notice to commence on July 1, 2021.

Furthermore, SDG&E will continue to use the CARE probability model,⁷ which exempts certain customers from recertification requirements for one cycle.⁸

Customers will receive recertification notifications based on their preferred method of communication. As previously discussed, SDG&E will also continue to send customer recertification lists to its outbound telephone campaign contractor to complete over-the-telephone recertification. Customer lists that are due for recertification are provided on a bi-weekly basis and processed within 30 days of receiving the completed recertification.

During 2020, to support CARE capitation agencies, SDG&E broadened access to the CARE contractor portal to assist customers with their CARE enrollment process online. The CARE contractor portal tracks enrollments by source code assigned to each CARE capitation agency in order to provide appropriate credit for new CARE enrollments.

Post Enrollment Verification and High Energy Usage Verification

SDG&E's Transition Plan for CARE and FERA post enrollment verification (PEV) is to resume PEV starting July 1, 2021. SDG&E will aim to complete between 3% to 6% PEV by the end of 2021 to meet the requirements specified in D.12-08-044. SDG&E follows the same 90/60/30-day methodology to notify customers of verification requirements prior to the deadline.

As discussed previously, any CARE or FERA customer who enrolled or voluntarily recertified during the COVID-19 Emergency Customer Protections period will be evaluated via the probability model to determine whether the customer is exempt from post-enrollment verification requirements.

⁷ The Commission approved SDG&E Advice Letters 2515-E/2224-G and 2515-E-A/2224-G-A for the probability model effective October 3, 2013.

⁸ Customers are generally required to recertify every two-years except for fixed-income customers, who recertify every four-years.

SDG&E will commence all high energy usage (HEU) verification program requirements as normal upon the expiration of customer protections. CARE program HEU notices are sent any time a customer meets or exceeds the high-usage threshold of 400% and 600% of monthly baseline.⁹

Pursuant to D.12-08-044, SDG&E will also commence the 24-month rule for CARE customers who fail to provide requested income verification documentation or who are determined to be ineligible for the program. Under the 24-month rule, customers who are removed from the program are barred from participation for 24-months.

Operational Plan for Medical Baseline Customers

Recertification

The recertification process for the Medical Baseline program is similar to CARE and FERA, in that it is based on an “anniversary date” that is individual for each customer, based on the date of enrollment or last recertification.

SDG&E will commence sending recertification notices when the COVID-19 Emergency Customer Protections are lifted. Per the standard process, program participants will receive the standard recertification notifications based on their preferred method of communication. Medical Baseline program recertification notices are sent as follows: the first notice is sent 60 days prior to the recertification deadline (or anniversary date) and the second final notice is sent 30 days prior to the recertification deadline.

Similar to CARE and FERA, Medical Baseline customers with an anniversary date within three months after the COVID-19 Emergency Customer Protections are lifted will have their anniversary date extended 90 days to allow adequate time to issue recertification notices and to complete the 60/30-day recertification process.

Medical Baseline customers who enrolled in the program during the COVID-19 Emergency Customer Protections period without a medical professional certification are tracked as having a non-permanent medical condition and will be required to provide medical professional certification one year from their enrollment date. Like CARE and FERA, Medical Baseline customers who were not required to recertify while protections were in place will be extended to the next anniversary date and will receive the standard 60/30-day notices as mentioned above.

Application Requirements

In addition, effective July 1, 2021, SDG&E will reinstate the Medical Baseline program requirement for new applicants to have their medical doctor, doctor of osteopathy, physician

⁹ Directed in Ordering Paragraph 101 of D.12-08-044.

assistant, or nurse practitioner certify to the utility that the additional energy, heating, or cooling allowance is medically necessary to sustain the life of a person being treated for a life-threatening illness or a compromised immune system or to prevent deterioration of that person's medical condition. Per the requirements of D.20-06-003, those certifications may be provided in writing or electronically.¹⁰

Water Data Sharing

Pursuant to D.11-05-004, SDG&E is required to exchange customer data with water utilities to streamline the enrollment in low-income assistance programs twice a year. As reported in the California Water Association Meet and Confer report regarding the low-income data exchange process,¹¹ SDG&E agreed to accommodate more frequent CARE data exchanges, consistent with the additional exchange performed in 2020, up to a maximum frequency recommended to be no more than quarterly.

Compliance and Safety Focus

Implementation of this Transition Plan will not preclude SDG&E's compliance with existing statutes, regulations, and ordinances. For instance, D.20-06-003 requires SDG&E to implement permanent support measures for residential customers such as the elimination of deposits for establishing and re-establishing service, and the implementation of 12-month payment arrangements for customers facing an inability to pay their bill. In addition, D.20-06-003 prevents SDG&E from disconnecting residential customers if the customer has a LIHEAP Pledge pending; is on a 12-month payment arrangement and is current on both monthly bills and the payment arrangement; is participating in AMP and is current on current months bills; if the customer qualifies for Medical Baseline and agrees to a 12-month payment arrangement; or if temperatures are forecasted to be above 100- or below 32-degrees on a 72-hour look ahead. SDG&E's Transition Plan operations will continue to comply with these and all other Commission directives as well as all safety guidelines.

As the COVID-19 pandemic continues to evolve, this Transition Plan necessarily requires some flexibility in implementation as California and the communities in SDG&E's service territory work to control the spread of COVID-19. SDG&E will continue to monitor developments and governmental directives (federal, state, and local) to maintain compliance with all applicable health and safety ordinances. SDG&E reserves the right to postpone or change some or all of the provisions of this Transition Plan as necessary to protect the safety of its employees, customers, and the public. SDG&E will apprise the Commission and stakeholders if such changes become necessary.

¹⁰ D.20-06-003 at 76-77.

¹¹ R.17-06-024, Report of California Water Association on Meet and Confers Regarding Low-Income Data Exchange Process (December 1, 2020) at 4.

Statewide IOU, LIOB, and Agency Coordination

IOU Coordination

SDG&E has met with the other large investor-owned utilities (IOUs) on a weekly basis to collaborate and evaluate proposals for best practices and potential areas of consistency in development of this Transition Plan.

SDG&E will continue to collaborate with the IOUs and adjust as needed.

Low Income Oversight Board (LIOB) Coordination

Resolution-4849 directs the IOUs to present each respective Transition Plan at the first quarterly LIOB meeting of 2021. Pursuant to the Resolution, SDG&E, along with the other utilities, presented its draft Transition Plan to the LIOB on March 11, 2021.

Subsequently, the LIOB served a letter with Transition Plan recommendations to the IOUs and interested parties on March 24, 2021.¹² SDG&E has assessed and incorporated feedback where feasible and responds to each recommendation below.

LIOB Recommendation	SDG&E Response
<p>Extreme Climate Protections</p> <ul style="list-style-type: none"> a. The LIOB recommends that all transition plans include a 7-day or 168 hour-look-ahead period, where if temperatures are forecasted to be above 100 degrees or below 32 degrees, the household shall not be disconnected. The LIOB requests this to be in effect through December 31, 2021. b. The LIOB also requests the Commission to pursue all other appropriate procedural avenues to make this best practice a permanent policy thereafter. c. While not within the scope of the Resolution, the LIOB asks the Commission to work with the utilities to develop an “emergency restoration policy,” that would temporarily restore service to any household already disconnected when an extreme climate event is predicted in the immediate future. *These recommendations above are made with the assumption that restoring and/or maintaining power would not conflict with a Public Safety Power Shutoff scenario. 	<ul style="list-style-type: none"> a. A 7-day look ahead would not be beneficial as most of the customers will already be reconnected by the time the 7th day comes around. Historically, customers in SDG&E’s territory are typically reconnected within 3 days of disconnection. SDG&E reiterates that the 72-hour forecast is conducted on a “rolling” 3-day forecast that is reviewed daily. b. The 72-hour look ahead interim rule was made permanent in the Disconnection OIR Phase I Decision, D.20-06-003. SDG&E reiterates that any modifications (temporary or permanent) to a Commission Decision or Order must be issued by the Commission. c. SDG&E agrees with LIOB that an “emergency restoration policy” is outside the scope of this proceeding and Resolution.
<p>Increase CARE Subsidies for the Most Vulnerable to 50% as Part of AMP</p> <ul style="list-style-type: none"> a. The LIOB recommends that the Commission instruct utilities to include CARE discounts of up to 50% for households at the highest risk of disconnection as part of their transition plans or other appropriate process. This recommendation is only for households 	<ul style="list-style-type: none"> a. California Legislation Assembly Bill 327 and P.U. Code section 739.1(c)(1) states the effective CARE discount shall not be less than 30% and more than 35% of the revenues that would have been produced by non-

¹² The letter served to the IOUs and parties on March 24, 2021 is dated March 19, 2021.

<p>believed to be at high risk of a future disconnection absent of this measure.</p>	<p>CARE customers.¹³ SDG&E’s current effective CARE discount is 35% and at the legislatively mandated maximum. The Commission explored the idea of an increased discount or tiered CARE discount in the Rate Restructuring proceeding (D.19-09-004) and declined to adopt the proposals because “increasing the discount for a subset of CARE customers necessarily results in reducing the CARE discount for another subset of CARE customers”¹⁴ in order to comply with the abovementioned statute. Accordingly, SDG&E and the energy IOUs do not currently have the authority to adopt this recommendation.</p>
<p>CARE Data Sharing for Water Utilities</p> <ol style="list-style-type: none"> a. The LIOB recommends that the Commission instruct electricity and gas utilities to share their CARE data with Class A and Class B Water Utilities at intervals of no less than a quarterly basis as part of their transition plans. b. The Board further encourages the Commission to pursue all avenues to make this practice a permanent policy to ensure low-income households have access to all programs that may reduce their utility costs. This includes allowing utilities the resources to build the necessary systems for implementation and management. 	<p>SDG&E notes that the IOUs already share this type of CARE data with the Water Utilities twice a year. SDG&E is open to sharing data more frequently if directed, noting that it is incumbent upon the water utilities to be able to receive and utilize the data that is transmitted.</p>
<p>Marketing and Outreach</p> <ol style="list-style-type: none"> a. The Board recommends the Commission to direct IOUs transition plans to require separate and distinct marketing, education, and outreach plans for targeting hard-to-reach customers, including those residing on tribal lands and within communities designated as low-income, disadvantaged, and/or underserved. Plans should disclose geographical detail to identify the areas the specific targeted outreach and marketing plans will encompass. b. The Board recommends the Commission extend flexibility for IOUs to increase marketing, education, and outreach budgets by 50% for the transition period, to ensure marketing and outreach plans are adequately scaled and incorporate the needed enhancements to effectively serve hard-to-reach customers and underserved communities. In extending this flexibility, the Commission shall require IOUs to identify financial and contractual resources extended to human services agencies and 	<ol style="list-style-type: none"> a. SDG&E plans to provide outreach through CBOs who have a significant representation in AFN communities including low income, tribal, hard-to-reach, and disadvantaged customers. SDG&E does not believe a separate distinct ME&O plan is necessary because, as discussed for Transition Plan ME&O above, SDG&E intends to leverage its ESP Network which has proven successful in reaching customers for the CARE/ESA programs. Such efforts assisted SDG&E with enrolling 99% of the estimated eligible population prior to the COVID pandemic,¹⁵ and includes the communities the LIOB references in this recommendation. b. SDG&E already provides annual funding to the 190 CBOs within its Energy Solutions Partner Network. As part of these agreements, the partners assist with program outreach efforts and can leverage additional

¹³ Per Public Utilities Code Section 739.1, the calculation of the effective CARE discount includes the CARE program costs plus other costs that CARE customers do not pay for in rates, including, California Solar Initiative, self-generation incentive program, Department of Water Resources, and any discount in a fixed charge.

¹⁴ D.19-09-004 at 13.

¹⁵ A.14-11-007, *et al.*, SDG&E February 2020 Low Income Monthly Report at 17.

<p>community-based organizations specifically targeting and serving hard-to-reach customers and underserved communities.</p> <p>c. The Board recommends the Commission direct IOUs to develop reporting mechanisms to track expenditures and outcome results from partnerships with community-based organizations and human services agencies specifically targeting hard-to-reach customers and underserved communities.</p>	<p>support. Currently, SDG&E does not anticipate the need for additional funding to support these efforts for this Transition Plan. Many of these organizations are already prepared to assist in outreach related to SDG&E’s new AMP and this Transition Plan outreach is related and will be incorporated in that education and outreach effort.</p> <p>c. SDG&E has reporting mechanisms in place and will continue to track targeted program expenditures. For example, SDG&E already tracks and presents all CBO activities including outreach through events, presentations, meetings, trainings and social media messaging in the Monthly Low-Income Reports filed in the Low Income proceeding. The focus of each activity and targeted demographics are also captured in this tracking effort.</p>
<p>Define and Measure Success</p> <p>a. The LIOB recommends the Commission direct utilities to provide no less than quarterly reports to the LIOB that at a minimum provide the following information as part of their transition plans:</p> <ul style="list-style-type: none"> ○ What number and percentage of disconnections were households enrolled in AMP? ○ What number and percentage of disconnections were households enrolled in CARE where applicable? ○ What number and percentage of disconnections were households enrolled in CARE and AMP? ○ What number and percentage of disconnections were households that received assistance from the LIHEAP program? ○ What percentage and number of households enrolled in AMP were referred to the following programs: <ul style="list-style-type: none"> ● ESA ● LIWP ● LIHEAP ● Other Programs ○ What were the median and average lengths of disconnections? ○ What were the median and average arrearage amount and time past due from a disconnection? <p>b. The LIOB further recommends the Commission to direct all utilities to include their definition of success in their transition plans so this can be measured with the data presented in answering the above. If possible the Board requests utilities</p>	<p>a. SDG&E is going to transition to a new CIS platform on April 5. During the stabilization period previously addressed, SDG&E will have extremely limited ability to change or add to reporting requirements. Any changes to the system will create instability and increase the risk of system error. SDG&E has the following feedback to the specific metrics offered by LIOB:</p> <ul style="list-style-type: none"> ○ What number and percentage of disconnections were households enrolled in AMP? <i>Customers enrolled in AMP do not get disconnected for non-payment while enrolled on the plan.</i> ○ What number and percentage of disconnections were households enrolled in CARE where applicable? <i>Currently reported in the Monthly Disconnection Report.</i> ○ What number and percentage of disconnections were households enrolled in CARE and AMP? <i>Customers enrolled in AMP do not get disconnected for non-payment while enrolled on the plan.</i> ○ What number and percentage of disconnections were households that received assistance from the LIHEAP program? <i>SDG&E would need clarity as to what time periods the customer would have received the assistance and would need to evaluate if this is possible.</i>

<p>coordinate their definition of success to ensure uniformity in outcome evaluation.</p>	<ul style="list-style-type: none"> ○ What percentage and number of households enrolled in AMP were referred to the following programs: ESA, LIWP, LIHEAP, and Other Programs? <i>SDG&E does not have a mechanism to track such referrals.</i> ○ What were the median and average lengths of disconnections? <i>SDG&E would need to evaluate if this is possible.</i> ○ What were the median and average arrearage amount and time past due from a disconnection? <i>SDG&E would need to evaluate if this is possible.</i> <p>It should be noted, the Resolution will require certain AMP metrics in the Monthly Disconnection OIR Report, to be determined upon the Commission’s disposition letter on the Transition Plan Advice Letters. Furthermore, D.20-06-003 requires annual AMP reporting with similar metrics.</p> <p>b. SDG&E reiterates that any proposed uniform definition of “success” should be issued directly from the Commission.</p>
<p>Aliso Canyon Best Practices</p> <ul style="list-style-type: none"> a. The LIOB recommends that the Commission direct the IOUs to enhance Energy Savings Assistance (ESA) with emergency energy cost reductions measures that ensure a minimum of 10% savings to low-income ratepayer bills as part of their transition plans or other appropriate process. 	<ul style="list-style-type: none"> a. D.16-04-040 adopted criteria to loosen ESA measure restrictions applicable to SCG and SCE service areas, including suspending the “three measure minimum and go-back” rules and targeting a minimum average energy <u>savings</u> increase of 10%. SDG&E notes that an energy savings increase is different than the “10% savings to low-income ratepayer bills” in the LIOB request. While related, bill savings and energy savings are not directly correlated. In addition, due to the installation of some measures that may provide “health, comfort and safety” benefits but no energy savings, energy bills may actually increase as a result of ESA treatment, due to the customer use of an appliance that was previously not in working order. In the current Low-Income Application (A.19-11-003 <i>et al.</i>), which is under Commission consideration, extensive comments were filed by all IOUs regarding the ability to achieve a year-over-year annual increase in energy savings, even when considering the rule modifications which are already in place.

	<p>SDG&E currently provides all feasible measures and the current mix of measures in SDG&E’s area authorized by the Commission are being offered to eligible homes. If the LIOB request is to achieve “a minimum of 10%” as an energy savings goal, SDG&E believes that may not be achievable or realistic. The energy savings reflected in the most recent 2017 Impact Evaluation shows lower energy savings overall for the measures currently approved by the Commission for the ESA program. These diminishing energy savings measure values, challenges with measure installations, and the moderate climate in SDG&E’s territory will likely not yield such energy savings.¹⁶ SDG&E is uncertain as to which additional measures may qualify in its territory under this LIOB recommendation; however, SDG&E is open to inclusion of such measures should the measure(s) be identified and approved by the Commission, including respective budgets.</p>
<p>Coordination with LIHEAP</p> <ul style="list-style-type: none"> a. The Board recommends the Commission direct IOUs to establish data sharing agreements between Local Service Providers (LSPs), CSD, and IOUs to effectively target LIHEAP assistance to at-risk customers (i.e. customers at-risk of losing services due to nonpayment) as part of their transition plans. b. The Board recommends the Commission direct IOUs to explore opportunities for and fund joint program enrollment pilots with LSPs to facilitate enrollment of at-risk low-income IOU customers in LIHEAP and IOU CARE Medical Baseline, Percentage of Income Payment Plans (PIPP), and the Arrearage Management Program (AMP) using a single streamlined intake process as part of their transition plans. CSD, working together with selected LSPs, would participate in the development and administration of such pilots. 	<ul style="list-style-type: none"> a. Pursuant to D.20-06-003, SDG&E notes that it is currently working on finalizing a non-disclosure data sharing agreement, which will be in place between CSD and the LSPs. The LIHEAP pledge portal for LSPs will go live on April 5, 2021 and allows for data sharing, including visibility into customer balances for pledging purposes. b. LIHEAP, CARE, Medical Baseline, and AMP all have varying eligibility criteria, which do not align. SDG&E currently coordinates with LSPs for outreach related to these specific programs. However, a “single streamlined intake process” would be prohibitively expensive and inefficient due to the differing eligibility requirements. Furthermore, the Percentage of Income Payment Plan (PIPP) program is being considered in a separate proceeding and has not been authorized by the Commission nor has it been implemented.¹⁷
<p>Referral to Weatherization and Other Programs as Part of AMP</p> <ul style="list-style-type: none"> a. The LIOB recommends that the Commission direct IOUs to include a referral to ESA, LIWP, and other 	<ul style="list-style-type: none"> a. SDG&E reiterates that any permanent modifications to a Commission decision, order, or program must be issued by the Commission. However, the IOUs have extended various ME&O efforts as they

¹⁶ A.19-11-003, *et al.*, Comments of San Diego Gas & Electric Company (U 902 M) on Administrative Law Judge’s Ruling Seeking Comments on Energy Division Staff Proposal to ESA Program Design at 10-11.

¹⁷ See R.18-07-005 (Phase 2).

<p>weatherization programs in the AMP enrollment process, as part of their transition plans.</p> <p>b. The LIOB recommends that the Commission direct IOUs to work closely with SOMAH, LIWP, CARE and ESA service providers, CBOs and community stakeholders, to construct enrollment best practices with improved outreach, program eligibility and tailored household energy assessments to better target ratepayer investments that enhance energy savings and reduce energy burden.</p>	<p>relate to AMP, including bill inserts/onserts, social media campaigns, and an AMP-dedicated website on SDG&E.com. In order to be eligible for AMP, customers must be residential CARE/FERA customers. If a customer is eligible and calls the IOU to enroll, SDG&E's CCC and AMP specialists assist with the AMP enrollment process. Additionally, the Commission already mandates referrals from CARE to ESA. And ESA is required to coordinate with LIWP. Thus, SDG&E is already accomplishing LIOB's recommendation.</p> <p>b. Apart from the outreach already occurring and described above, SDG&E appreciates LIOB's recommendation and will take it into consideration.</p>
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Other Coordination Efforts

SDG&E has also been working with the city and county jurisdictions in its service territory who are administering the COVID-19 Emergency Rental Assistance (ERA) Program. The ERA Program is designed to assist eligible households who have been financially impacted by the COVID-19 pandemic by providing financial relief for rental and utility arrears. While the programs are administered by local authorities, who also process the payments to reduce qualifying customers' utility arrears, SDG&E is also incorporating program outreach efforts into its Transition Plan ME&O activities.

Additionally, On March 30, 2021, the Energy Division asked the IOUs to consider promoting the rent and utility relief programs through various marketing channels, including websites and emails. The ED also directed the IOUs to state ME&O activities and include the following metrics in the reporting section of this Transition Plan:

- Number of payments applied to the utility bills
- Number of payments received to utility bills
- Total dollar amounts (\$) applied to utility bills
- Total dollar amounts (\$) received to utility bills

SDG&E will take the ED's request for marketing these programs into consideration and determine the best way to promote the utility relief programs. Lastly, SDG&E feels that any marketing, tracking, or metrics related to these relief programs are more appropriately suited in the COVID-19 Bill Debt OIR.

Progress Tracking and Reporting

SDG&E's Transition Plan will leverage existing reporting mechanisms to track and report important information, such as the Monthly Low Income and Monthly Disconnections Reports,

which are publicly available on the Commission Docket site via A.14-11-007 *et al.*¹⁸ and R.18-07-005, respectively. SDG&E proposes reporting important information included as part of this Transition Plan for up to a year after lifting the COVID-10 Emergency Customer Protections.

SDG&E would also like to note that due to the transition to the new CIS, and the necessary stabilization following the transition, SDG&E will need to evaluate if we are able to provide these metrics during our CIS stabilization period, which were provided for illustrative purposes as examples of progress metrics in the Resolution:

- Number of customers enrolled in AMP as a percentage of total customers eligible for AMP;
- Number of customers identified as eligible and interested in enrolling in payment programs and percent of these successfully enrolled; and
- Number of SDG&E customer care center complaints concerning payment plans.

Table 5 provides an overview of SDG&E’s proposed metrics and methodology. SDG&E proposes to utilize and report the following metrics for *up to a year* after lifting COVID-19 Emergency Protections:

Table 5: Proposed Metrics

Metric	Methodology
Customer retention post June 30, 2021: <ul style="list-style-type: none"> • Percentage of customers that complete recertification for the CARE and FERA Program • Percentage of customers that complete post enrollment verification for CARE and FERA Program 	CARE retention information is already reported in the Low Income Monthly Report in CARE Table 4 (Recertification) and CARE Table 3A (PEV). FERA information may be provided upon request.
Enrollments of impacted customers in new programs: <ul style="list-style-type: none"> • Number of new monthly enrollments/participation in income-qualified programs: <ul style="list-style-type: none"> o CARE o FERA 	CARE enrollment information is already reported in the Low Income Monthly Report in CARE Table 2. FERA information may be provided upon request.
Medical Baseline (MBL) <ul style="list-style-type: none"> • Number of new enrollments in MBL 	MBL information may be provided upon request.

¹⁸ At the time of this submission, SDG&E’s Low Income Application for program years 2021 through 2026 in A.19-11-003 et al is pending Commission decision. Once a Decision is approved for SDG&E’s Application, and the programs are implemented, SDG&E can begin filing the Monthly Low Income Report on that docket.

<p>AMP</p> <ul style="list-style-type: none"> • Number of customers enrolled in AMP 	SDG&E can provide Customers enrolled.
<p>Payment Plans</p> <ul style="list-style-type: none"> • Number of customers who enrolled in a payment plan • Number of kept payment plans • Number of broken payment plans 	This information is captured for Residential in Monthly Disconnection OIR Report including the number of customers that remain on payment plans by buckets (i.e. 1-3 months, 4-6 months,7-9 months, 10-12 months, greater than 12 months)
<p>Small Business Customers</p> <ul style="list-style-type: none"> • Number of who payment arrangements • Number of kept payment plans • Number of broken payment plans 	Move to monthly ED data request *For up to 15 months once ECP End* Requested PA's (created in each month) Number of new small business enrollments in payment plans by buckets (i.e. 1-3 months, 4-6 months,7-9 months, 10-12 months, greater than 12 months)

Budget/Cost Recovery

SDG&E’s Transition Plan utilizes many tactics that are no cost or low-cost options for customer outreach and communication. However, to the extent that tactics and strategies require unforeseen incremental increases in cost, SDG&E proposes that incremental costs associated with this Transition Plan be tracked in SDG&E’s COVID-19 Customer Protection Plan Memorandum Account (CPPMA).