Draft SB 1208 Report

LOW INCOME OVERSIGHT BOARD REPORT TO THE LEGISLATURE

May 11, 2023

Contents

I. Income-Qualified Programs

EXISTING INCOME-QUALIFIED ELECTRIC, GAS, AND WATER UTILITY CUSTOMER ASSISTANCE PROGRAMS

There are numerous existing income-qualified electric, gas, and water utility customer assistance programs available to Californians. This section provides an overview of each of those programs, including income eligibilities and existing cross-program outreach and enrollment strategies. While there is coordination between many of the income-qualified programs through marketing, outreach, and data sharing, a concurrent application process across multiple income-qualified utility programs is not yet available to help facilitate cross-program enrollment. Looking to other states for existing models may help illuminate strategies to develop a concurrent application system and lower barriers for enrollment across multiple income-qualified programs. One model of such an application system exists in Vermont was presented to the LIOB Subcommittee.

Existing income-qualified utility programs summarized in this section include:

- CPUC Energy & Water Programs
- Other State of California Energy and Water Programs
- Other State of California Programs with same income qualifications
- Description of models outside State of California of working concurrent application enrollment between these three program categories

CPUC Energy & Water Programs

Program Descriptions

The large IOUs provide three ratepayer-funded energy assistance programs and one ratepayer-funded water bill assistance program for qualifying low-income customers.

ESA (electric and gas)

The Energy Savings Assistance program (ESA) provides no-cost in-home weatherization services, energy efficiency measures, and energy education to help eligible low-income households conserve energy, reduce energy costs and improve their health, comfort, and safety. The program also provides information and education to promote energy efficient practices in low income communities. Income eligibility for ESA households is 250 percent or below FPG, expanded from 200 percent FPG in July 2022.[1] To enroll in ESA,

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[1] SB 756 (2021) updated Public Utilities Code Section 739.1 for ESA income eligibility to 250% of FPG beginning July 1, 2022.

customers must verify their household income, either through providing documentation for proof of income or proof of enrollment in a program with similar income eligibility criteria (i.e. categorical eligibility).

The ESA Common Area Measures (ESA CAM) program provides no-cost energy efficiency measures in common areas (e.g. hallways, lobbies) for income qualifying deed restricted multifamily properties.

In early 2022, IOUs began identifying highly vulnerable ESA customers in multiple need states and conducted competitive ESA solicitations to garner a wider number of applicants and diversify the ESA program workforce. In 2022, the first ESA pilots were launched to achieve the aim of providing deeper energy savings at the household level.

CARE (electric and gas)

The California Alternate Rates for Energy program (CARE) offers bill discounts off electric and gas utility bills to customers at or below 200 percent of the FPG. CARE customers receive a discount of 30-35 percent off electric utility bills and 20 percent off gas utility bills. CARE is funded by non-participating CARE customers as part of a statutory "public purpose program surcharge" that appears on monthly utility bills.

CARE is administered by the utilities, often in partnership with Community Based Organizations who enroll eligible customers in their communities, and has an enrollment rate of over 100 percent.[2] CARE is a self-certification program, thus no documentation for income eligibility is required to enroll. However IOUs have a post enrollment verification process (PEV) where customers are asked to provide documentation for proof of income or proof of enrollment in a public assistance program on the list of categorical eligibility programs.

FERA (electric)

The Family Electric Rate Assistance (FERA) program provides families of three or more, whose household income exceed CARE income eligibility of 200 percent and up to 250 percent, with an 18 percent discount on their electricity bill.

D.21-06-015 established a 50 percent enrollment goal by 2023 and a 70 percent enrollment goal by 2026. The decision also approved FERA dedicated program management budgets and directed the utilities to create tailored marketing and outreach efforts to reach these program enrollment goals. The increase in

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[2] Large IOUs 2021 Annual Reports. Enrollment rate for CARE is high, likely due to the economic impacts of the pandemic, which has increased CARE eligible households and enrollment.

income eligibility for the ESA program as of July 2022 allows for cross-program marketing and enrollment between ESA and FERA.

Like the CARE program, FERA is a self-certification program with no documentation for income eligibility required to enroll, however there is a PEV process where customers are required to provide proof of income.

CAP (water)

The Customer Assistance Program (CAP) is a water utility bill discount program applicable for Class A water utility customers at or below 200 percent of the FPG. The bill discount varies between utilities, including a percent discount of total bill, percent of service charge, or a bill credit. The CAP program is funded by non-CAP ratepayers for each of the nine Class A water utilities, or water utilities with greater than 10,000 connections.[3]

The CAP and CARE programs share customer data on a quarterly basis to facilitate automatic enrollment between the two programs. While automatic enrollment is not commonly practiced, there was support for CARE and CAP auto-enrollment given the uniformity between both income eligibility and program offering for discounts on utility bills. Water utilities tend to have fewer resources and staff to dedicate to marketing and outreach, but are able to leverage the success of the CARE program; around 90 percent of CAP customers are identified through CARE data sharing.[4] If a customer is auto-enrolled into CAP from a data match with the CARE program, the customer is sent a letter and given the option to opt out.[5]

Cross-Program Outreach and Enrollment Strategies

The energy and water utilities implement various strategies to increase awareness, generate leads, and facilitate enrollment in other income-qualified programs, including marketing and outreach, program coordination, and data sharing.

Customers enroll in the ESA program through various channels including leads from CARE program participants, door-to-door neighborhood canvasing, direct mail, email, community-based organizations, categorical enrollment, online, and community events. Marketing materials are available in multiple

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[3] Board member John Tang, Presentation on the Water CAP Program, February 17, 2023 SB 1208 Subcommittee Meeting https://liob.cpuc.ca.gov/wp-content/uploads/sites/14/2023/02/2023-02-17-SB1208-Subcommittee-Slides.pdf?emrc=9dbaca

[4] Board member John Tang, January 20, 2023 SB 1208 Subcommittee Meeting

[5] Board member John Tang, Presentation on the Water CAP Program, February 17, 2023 SB 1208 Subcommittee Meeting

languages. Customers participating in ESA are provided information on CARE and/or FERA, and can request automatic enrollment into CARE or FERA on the ESA Program application.

IOUs use cross-promotional outreach strategies to increase awareness of multiple income-qualified programs, such as through websites and flyers with information on programs such as ESA, CARE, FERA, LIHEAP, Arrearage Management Plan (AMP), Medical Baseline, and Lifeline. Additionally, IOUs will coordinate with other utilities and agencies to facilitate enrollment, such as SDG&E with San Diego County Water Authority to leverage enrollments for customer receiving water and energy saving measures.[6]

Automatic enrollment into a program, where there is no action required of the customer, is an uncommon practice and only exists between CAP and CARE, and between ESA, CARE, and FERA, given the uniformity in income eligibility and program offerings of CAP and CARE. Automatic enrollment is enabled by data sharing agreements between each of the four large IOUs and the eight Class A water utilities to share customer data between two programs for the purposes of facilitating enrollment and income verification.[7] Data sharing agreements are also established between the large IOUs and CSD to identify customers receiving LIHEAP payments and/or ESA treatments, and to target customers not already enrolled in CARE or FERA. Lastly, IOUs share data between ESA and DAC-SASH programs to support ESA program targeting and CARE/FERA enrollment.[8]

SDG&E, PG&E and CSD recognized that establishing data sharing agreement is a long process given the sensitivity of customer information and consumer privacy laws. In order to share data between programs to generate customer leads and facilitate enrollment, each program must receive customer consent prior to sharing. Consent is received through the application of the program the customer was originally enrolled in, and does not cover all income-qualified programs.

Other CPUC Energy Programs

In addition to the ESA, CARE, FERA, and CAP programs detailed above, there are several other CPUC energy programs available to income-qualified customers. There are no additional CPUC income-qualified water utility programs. CPUC programs with similar income eligibility guidelines (around 200% of FPG) are provided in Table 1.

Table 1: Additional CPUC Programs

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[6] SDG&E presentation, March 10, 2023 SB 1208 Subcommittee Meeting

[7] Board member John Tang, Presentation on the Water CAP Program, February 17, 2023 SB 1208 Subcommittee Meeting

[8] SDG&E and PG&E presentations, March 10, 2023 SB 1208 Subcommittee Meeting

Program	Primary Purpose	Administration / Implementers / Funder	Income Eligibility
Solar on Multi-family Affordable Housing (SOMAH)	Utility bill reduction through onsite generation	CPUC / 4 CBOs / funded by IOU GHG auction proceeds	60% of AMI, with documentation required
Self-Generation Incentive Program (SGIP)	Reduce emissions of greenhouse gases, peak demand, and ratepayer costs per PUC §379.6(a)(1). The equity resiliency budget also aims to enhance customer resiliency.	CPUC / IOUs / IOU ratepayer funded	80% of AMI, with documentation required: • California Indian Country ≤80% AMI only • Single family homes ≤80% AMI & subject to actual or presumed resale restriction or equity sharing agreement • Multifamily residential buildings of ≥ 5 units of low-income deed-restricted housing & located in a DAC or ≥80% of households ≤60% AMI
Disadvantaged Communities – Solar Single Family Homes (DAC-SASH)	Utility bill reduction through onsite generation for single family homes located in a disadvantaged community (DAC)	CPUC / GRID Alternatives / funded by IOU GHG auction proceeds revenues and IOU ratepayer funded	Up to 250% of FPG, with documentation required
Disadvantaged Communities - Green Tariff (DAC-GT) and Community Solar Green Tariff (CSGT)	Access to utility scale clean energy at a 20% bill discount for residential customers in	CPUC / IOUs / funded by IOU GHG auction proceeds and IOU ratepayer funded	Up to 250% of FPG, with documentation required

	DACs and income-qualified households		
Arrearage Management Plan (AMP)	Debt forgiveness plan for residential customers	CPUC / IOUs / IOU ratepayer funded	Customer who: • Are enrolled in CARE or FERA • Owe at least $500 or more on their gas and electric bill OR (for gas-only customers) owe at least $250 or more on their gas bill • Are more than 90 days past due • Have been a PG&E customer for at least six months • Have made at least one on-time payment

Other State Energy and Water Programs

Program Descriptions

The State of California provides many programs offering an array of services to assist low-income manage the financial burden of home energy, water and wastewater services, meet their immediate home energy needs, improve the energy efficiency of housing occupied by low-individuals and families, and enable the acquisition of clean vehicles.

<u>Low Income Home Energy Assistance Program</u>

The federal LIHEAP provides various forms of assistance to low-income Californians to manage their financial burden for home energy and meet their immediate home energy needs. LIHEAP is funded by the U.S. Department of Health and Human Services, Administration for Children and Families, Office of Community Services. The State Department of Community Services & Development (DCSD) is the designated administering agency for LIHEAP in California.

LIHEAP is comprised of the following program service components:

- The Home Energy Assistance Program provides one-time financial assistance to help balance an eligible household's utility bill.

- The Energy Crisis Intervention Program provides assistance to low-income households that are in a crisis situation, such as a household receiving a 24-48 hour disconnect notice or service termination by their utility company due to nonpayment.

- Wood, Propane and Oil Program provides a one-time financial assistance to help offset the cost for alternative home heating fuels such as wood, propane, and oil.

- Weatherization Program provides free energy efficiency upgrades to eligible low-income dwellings to lower monthly utility bills while also extending benefits of improved the health, safety, and comfort to occupants.

DCSD contracts with a network of community-based organizations and public entities, also known as Local Service Providers, that maintain responsibility for providing intake, outreach, and service delivery throughout the state. Due to limited annual funding, LIHEAP prioritizes services to households with the lowest income and highest energy burden while, as well as households with vulnerable populations, including the elderly, disabled and households with young children. To enroll in LIHEAP, individuals must contact their local LIHEAP service provider to obtain an application, maintain a household income at or equal to 60% of the State Median Income, and provide documentation to substantiate household income and expenses for home energy.

Low Income Household Water Assistance Program

Established by Congress in December 2020, the federal Low Income Household Water Assistance Program (LIHWAP) provides financial assistance to low-income Californians to help manage the financial burden for residential water utility service. The Department of Community Services and Development (DCSD) is the designated administering agency for LIHWAP in California.

LIHWAP assistance includes a one-time to help pay down a past due residential water or wastewater utility bill or offset the cost of maintaining water or wastewater utility services.

DCSD contracts with a network of community-based organizations and public entities, also known as Local Service Providers, that maintain responsibility for providing intake, outreach, and service delivery throughout the state. LIHWAP services are limited to state water and wastewater systems authorized to receive direct payment of LIHWAP customer assistance payments from DCSD. To enroll in LIHEAP, individuals must apply with their Local Service Provider, maintain a household income less than or equal to 60% of the State Median Income, provide documentation to substantiate household income and expenses for water or wastewater services to their home, and serviced by a wastewater system authorized to receive direct payment of LIHWAP customer benefits from DCSD.

Low-Income Weatherization Program

California's Low-Income Weatherization Program (LIWP) provides low-income households with solar photovoltaic (PV) systems and energy efficiency upgrades at no cost to residents. The program reduces greenhouse gas emissions and household energy costs by saving energy and generating clean renewable power by offering the following two core services. The Department of Community Services and Development (DCSD) is the designated administering agency for LIWP. The following provides a brief description of LIWP subprogram components and offerings:

Low-Income Weatherization Program - Farmworker Housing Energy Efficiency & Solar

The LIWP Farmworker Housing component provides no-cost rooftop solar PV systems and energy efficiency upgrades to low-income farmworker households to reduce greenhouse gas emissions and lower energy costs for participants. The Farmworker Housing Component is part of DCSD's Low-Income Weatherization Program (LIWP) and is designed to reduce greenhouse gas emissions by saving energy and generating clean renewable energy.

DSCD contracts with a third-party Program Administrator to direct program implementation. The Program Administrator and its team of partner organizations enroll eligible farmworker households and install energy saving and solar measures in single-family dwellings and buildings of 2-4 units across 18 counties with the highest farmworker populations.

Households may apply for service by contacting DCSD or the Farmworker Household Administrator directly to obtain an application. Eligibility requires that a household complete an application for assistance, maintain a household income less than or equal to 80% of Area Median Income or provide proof of current participation in a categorically eligible program, reside in a single-family dwelling, and include a household member that has worked as a farmworker within 12 months of the application for assistance.

Low-Income Weatherization Program - Multi-Family Energy Efficiency and Renewables

The LIWP Multi-Family Energy Efficiency and Renewables component provides technical assistance and incentives for the installation of energy efficiency measures and solar PV in low-income multi-family dwellings serving priority populations and disadvantaged community members. Properties that participate in the LIWP Multi-Family Component benefit from lower energy costs while reducing energy demand and GHG emissions. The program also helps preserve affordable housing by reducing property owner operating costs.

DCSD contracts with a third-party Program Administrator to oversee all facets of program implementation, including performing the screening of properties for eligibility, assessing opportunities for energy efficiency improvements, and providing technical assistance offerings to property owners to assist the financing and completion of identified energy efficiency measures and retrofit improvements to the enrolled property.

LIWP Multi-Family Energy Efficiency and Renewables program offerings are specifically oriented to property owners of low-income multi-family property meetings the following requirements:

- Located in a qualified designated low-income or disadvantaged service area in accordance with the latest iteration of the California Communities Environmental Health Screening Tool;

- Property exhibits strong potential for significant energy reduction through the installation of energy efficiency retrofits funded in whole or in part by LIWP financial incentives;

- The property is classified as U.S. Department of Housing and Urban Development (HUD) Section 8 housing or an affordable housing property in which no less than 66 performed of the units are occupied by households with an income of 80 percent or less of the Area Median Income as established by HUD;

- The property has not received significant energy efficiency upgrades or renovations within the previous five years; and

- Provides demonstrable benefits to building tenants.

Clean Vehicle Rebate Program

The Clean Vehicle Rebate Program provides up to $7,500 for the purchase or lease of a new plug-in hybrid electric vehicle (PHEV), battery electric vehicle (BEV), or a fuel cell electric vehicle (FCEV). CVRP offers vehicle rebates on a first-come, first-served basis and helps get the cleanest vehicles on the road in California by providing consumer rebates to reduce the initial cost of advanced technologies. The Center for Sustainable Energy administers the Clean Vehicle Rebate Program on the behalf of the California Air Resources Board.

Rebates are available to income qualified consumers with household incomes that are less than or equal to 400% of the federal poverty level. Applications must be submitted within 90 calendar days of the purchase or lease data to be eligible for a rebate.

Clean Cars 4 All

Clean Cars 4 All is a program that focuses on providing incentives through California Climate Investments to lower-income California drivers to scrap their older, high-polluting car and replace it with a zero- or near-zero emission replacement. The program aims to focus the benefits of the program to low-income and disadvantaged communities and has a heavy emphasis on consumer protections, education of the new technologies, and coordination with other clean transportation programs. The California Air Resources Board is the designated administering agency for the Clean Cars 4 All program.

The Clean Cars 4 All program helps lower-income California residents replace old, polluting cars with cleaner, more fuel-efficient vehicles. Programs are available in select air districts, and individual air districts administer the local Clean Cars 4 All program.

Program offered incentives are limited to lower-income individuals with incomes at or below 300 percent of the Federal Poverty Level and those meeting certain needs-based criteria.

Clean Vehicle Assistance Program

The Clean Vehicle Assistance Program provides grants and affordable financing to help income-qualified Californians purchase or lease a new or used plug-in hybrid, fuel cell, or electric vehicle. The Beneficial State

Foundation administers the Clean Vehicle Assistance Program on the behalf of the California Air Resources Board.

Program offerings include low-interest loans and vehicle price buy-downs for lower-income consumers to purchase new or used battery electric, plug-in hybrid electric, or fuel cell electric vehicles and grants for charging installation or charge cards plus a portable charger. Eligibility is limited to lower-income individuals residing within a disadvantaged community (DAC) and with incomes at or below 300 percent of the Federal Poverty Level.

The Beneficial State Foundation administers the CVA Program. For more information and for program FAQs, please visit the CVA Program official program page or contact BSF:

Program	Primary Purpose	Administration / Implementers / Funder	Income Eligibility
Low Income Home Energy Assistance Program	Reduce the financial burden for home energy and address the immediate energy needs of low-income households	DCSD / 41 CBOs / funded by federal LIHEAP Block Grant	60% of SMI, with documentation required
Low Income Water Household Assistance Program	Reduce the financial burden for residential water and wastewater services	DCSD / 41 CBOs / funded by federal LIHWAP grant funds	60% of AMI, with documentation required
Low-Income Weatherization Program - Farmworker Housing Energy Efficiency & Solar	Improve the energy efficiency of residential housing occupied by low-income farmworker families and reduce GHG emission	DCSD / Program Administrator/ funded by California Climate Investments and State General Funds	80% of AMI, with documentation required
Low-Income Weatherization Program - Multi-Family Energy Efficiency and Renewables	Access to utility scale clean energy at a 20% bill discount for residential customers in	DCSD/ Program Administrator / funded by California Climate Investments and State General Funds	80% of AMI, with documentation required

	DACs and income-qualified households		
Clean Vehicle Rebate Program	Provides up to $7,500 for the purchase or lease of a new plug-in hybrid electric vehicle (PHEV), battery electric vehicle (BEV), or a fuel cell electric vehicle (FCEV)	CARB / Program Administrator / IOUs / California Climate Investments	400% of Federal Poverty Guidelines, with documentation required
Clean Cars 4 All	Provides financial incentives to lower-income California drivers to retire older, high-polluting car and replace it with a zero- or near-zero emission replacement	CARB / Regional Program Administrators / California Climate Investments	300% of Federal Poverty Guidelines, with documentation required
Clean Vehicle Assistance Program	Provides grants and affordable financing to help income-qualified Californians purchase or lease a new or used plug-in hybrid, fuel cell, or electric vehicle	CARB / Program Administrator / California Climate Investments	300% of Federal Poverty Guidelines, with documentation required

Other State Programs with Same Income Qualifications

In addition to the CSD-administered programs detailed above, there are numerous public assistance programs currently available to Californians with similar income eligibility guidelines (around 200% of FPG).

Table 2: Other Public Assistance Programs in California

Program	Primary Purpose	Administration / Implementers / Funder	Income Eligibility

CalFresh	Monthly food benefits on an Electronic Benefit Transfer (EBT) card	California Department of Social Services (CDSS) / County Implementers / Federal funding through Supplemental Nutrition Assistance Program (SNAP)	At or below 200% of FPG for most households. Exceptions include people 60+ and disabled who may have a higher income and still qualify.
CalWORKS	Cash aid for rent, housing, food, clothing, and utilities for families with at least one child.	CDSS / County Implementers / Federal, state, and county funded	Gross income must be under the Minimum Basic Standard of Adequate Care (MBSAC) for the family.
General Assistance or General Relief (GA/GR)	Cash aid for adults who are not supported by their own means, other public funds, or assistance programs.	CDSS / County Implementers / County funded	Varies by county.
Medi-Cal	Free or low cost health coverage.	Department of Health Care Services (DHCS) / County Implementers / Federal and state funded	Up to 138% of FPG for most households. Individuals may also qualify if 65+, blind, disabled, under 21, pregnant, in a care facility, refugee status, caretaker of an age eligible child, or have been screen for breast and/cervical cancer.
Women, Infants, and Children (WIC)	Nutrition education, breastfeeding support, healthy foods, and referrals to health care and other community services.	California Department of Public Health (CDPH) / Local Implementers / Federal funding	At or below 185% of FPG for a household.

Public Housing and Housing Choice Vouchers	Assists low-income families, elderly, and persons with disabilities to afford decent, safe, and sanitary housing.	U.S. Department of Housing / Public housing agencies (local and county) / Federal funding	50% AMI for most households.

Existing Concurrent Application Enrollment Models

This section will be completed in a later draft.

II. Universal Lifeline Telephone Service Program

PROGRAM BACKGROUND AND ROLE OF THIRD-PARTY ADMINISTRATOR

This section contains a description of Universal Lifeline Telephone Service Program, specifically the following program characteristics and implementation information.

- Eligibility and assistance offerings
- General Administration
- Roles and Responsibilities of the third-party administrator contract
- Roles and Responsibilities of service providers
- Existing application enrollment system(s)
- Existing linkages/program coordination with CPUC Energy and Water Programs and other programs

Eligibility and Assistance Offerings

The California LifeLine program provides affordable phone service to eligible low-income customers through approved California LifeLine Service Providers (i.e., phone companies) who offer a discount on their wireless or wireline voice service or broadband (i.e., internet) service. The California LifeLine Service Providers receive a reimbursement from the Universal LifeLine Service fund.

Applicants may qualify for California LifeLine in two ways: (1) through enrollment in an eligible public assistance program (program-based eligibility) or (2) by meeting an income threshold (income-based eligibility). Under program-based eligibility, households may qualify for the California LifeLine discounts if they provide supporting documentation that at least one household member is enrolled in one or more Lifeline/LifeLine-eligible public assistance programs. Over 90 percent of California LifeLine customers establish eligibility through program-based qualification and less than 10 percent through income-based qualification. Under income-based eligibility, a household may qualify for state LifeLine subsidy if the household's total annual gross income is at or less than approximately 150 percent of the Federal Poverty Leve (FPL). A household may qualify for the federal Lifeline subsidy if the household's total annual gross income is less than 135 percent of the FPL.

Unique to other public purpose programs, consumers get their LifeLine offerings from LifeLine telecommunication service providers. The Lifeline telecommunication service providers offer different types of phone service (i.e., wired or wireless), plus they have distinct enrollment outreach methods and application processes for interacting with customers that would be challenging to fit into a concurrent

application system. The LifeLine Third-Party Administrator interacts with LifeLine service providers as an intregral part of completing the enrollment and renewal processes. From the LifeLine perspective, promoting other CPUC programs would be challenging as LifeLine service providers focus solely on promoting their own business services.

General Administration

Roles and Responsibilities of the Third-Party Administrator contract

The California Public Utilities Commission (CPUC or Commission) contracts a Third-Party Administrator (TPA) to manage the enrollment and renewal processes for LifeLine customers. These processes include receiving inquiries from the participating Service Providers, processing mail/paper/electronic enrollment applications and renewals, hosting and managing online application and renewal processes, and providing a helpline for customer inquiries. The TPA also reviews and processes the eligibility of customers and communicates the certification of eligibility to Service Providers for customers to enroll in LifeLine plans. Additionally, the TPA communicates to customers via print, SMS, and pre-recorded outbound messages, informing them of their enrollment and renewal processes. The TPA creates daily customer print files and coordinates the print and mail fulfillment process with the Office of State Publishing (OSP). The Communications Division collaborates with the TPA to develop program implementation guidelines related to any FCC and Commission decisions.   California is one of three opt-out states that do not participate in FCC's National Verifier administered by Universal Service Administrative Company (USAC), the national TPA of the federal Lifeline program. The California LifeLine TPA facilitates the FCC's audits of Lifeline customer eligibility determinations and service provider customer records. The California LifeLine TPA manages and enhances its proprietary technology platform that runs all the federal and state programs' operational requirements. Therefore, the California LifeLine TPA must comply with federal and state legislation.

Roles and Responsibilities of service providers

The service providers offer eligible customers subsidized LifeLine plans, which they can choose based on their service and affordability needs. The service providers initiate the new enrollment process from their systems, and the TPA then determines eligibility and manages the completion of the application process. The service providers apply a discount to the participant's bill and submit monthly claims to the CPUC for reimbursements from the discounts granted to participants. California LifeLine Service Providers must meet specific FCC and California requirements demonstrating their functionality, financial and technical capabilities, compliance with customer and service quality standards, and compliance with General Order 153. Additionally, service providers advertise and market their LifeLine plans to prospective customers.

Existing Application Enrollment System(s)

Customers find their chosen LifeLine service provider and LifeLine service plan from the California LifeLine Program website or by calling the operations center, unless a LifeLine service provider has already directly marketed to them. There is no standard application enrollment system since each LifeLine service

provider has distinct outreach methods and application processes for customer interaction. Some examples of the multiple entry points through LifeLine service providers include: LifeLine service providers develop their own online customer systems; LifeLine service providers develop their own point of sale applications used in the field or operations centers by their agents; and/or they initiate to the LifeLine TPA to have a paper application mailed to their customer.

The California LifeLine TPA handles application enrollment and renewal processes through its proprietary technology platform and operations center to determine if an applicant is eligible to enroll or remain in California LifeLine.

LifeLine service providers keep their records on LifeLine customers in sync with the TPA system by initiating daily record exchanges from their system through an Application Programming Interface (API) or daily file process involving a Secure File Transfer Protocol (SFTP) server to the TPA system. When service providers use the Service Provider Intake API (SPIA), they interact in near real-time with the TPA system throughout a customer's enrollment process and have visibility to the status of identity verification, eligibility, and other documentation requirements.

Existing Linkages/Program Coordination with CPUC Energy and Water Programs and Other Programs

There are no current linkages or program coordination for enrollment with CPUC Energy and Water Programs. California LifeLine program had a Boost Mobile pilot with the CARE program that started in 2019 (Decision 19-04-021). It ended in 2021 due to the minimal increase in LifeLine participation that resulted from the CARE program's promotion of LifeLine. There is a linkage to CDSS' CalFresh Confirm eligibility verification hub, which the LifeLine TPA uses to check for enrollment of Lifeline applicants in CalFresh as a categorically eligible program. This linkage is also being explored through the CARE/FERA Post-Enrollment Verification (PEV) Working Group in 2023 to determine if this is a good/feasible solution for verifying income eligibility for CARE/FERA recertification and PEV purposes, and what the process would be to establish this connection. The Concurrent Application System (CAS) will also explore a future linkage with CDSS' Statewide Verification Hub, which will be able to offer additional program verifications along with CalFresh, including Medi-Cal, when it becomes available in 2024.

III. Universal Application System Working Group

UAS BACKGROUND AND WORKING GROUP RECOMMENDATIONS

The Universal Application System (UAS) was an effort initiated by the CPUC for ESA, CARE, and FERA programs, and the UAS Working Group formed in December 2021. UAS is aligned with SB 1208's concurrent application system (CAS) objectives, and the recommendations report from the UAS Working Group will be leveraged as much as possible in implementing SB 1208 and CAS. This section provides an overview of the following:

- Brief Background on UAS Working Group
- UAS Working Group Objectives
- UAS Working Group Recommendation Report: emphasis on recommendations and strategies directly aligning with SB 1208 objectives and those informing a potential roadmap for using new technologies in the future to: 1) to streamline customer enrollment and post-enrollment verification in CPUC energy and water assistance programs; 2) facilitate enrollment opportunities of assistance programs administered by the state and public and private utilities; and 3) maximize data sharing to promote greater public awareness of and participation in target programs.
- California Statewide Automate Welfare System (CalSAWS) and Statewide Verification Hub (SVH)

Background on UAS Working Group

The UAS Working Group was formed by the four large IOUs as directed by the decision on ESA, CARE, and FERA programs and budgets for 2021-2026 (D.21-06-015) to provide recommendations on the feasibility of developing a low-income programs-centric Universal Application System (UAS). The UAS Working Group held 10 public meetings over six months as a sub-working group under the overall ESA Working Group. Membership consisted of the IOUs, the Energy Division (ED), Community Based Organizations (CBO), ESA contractors, and others with experience and expertise in application systems.

The Decision outlined several basic requirements for UAS for the Working Group to build off:

- Single application portal, starting with ESA, CARE, and FERA

- Support and connect to other IOU programs, PAs, and implementers (i.e., program partners)

- Allow multiple registration pathways: online, in-person, by phone, text, email

- Customer types: owner, tenants, building manager/owner

- Ability to share application information and related energy usage information with program partners[9]

UAS Working Group Objectives

The UAS Working Group was tasked with addressing specific questions and requirements about the feasibility of developing a UAS laid out in D.21-06-015, including defining UAS purpose, goals, system requirements, and intra- and interagency solutions for a single statewide system.[10]

The report provides a summary of the UAS Working Group activities and discussions, and ultimately provides recommendations on UAS design and next steps. The report does not include detailed working plans, such as project scope, budget details, and timelines.

UAS Working Group Recommendations

There are five recommendations detailed in the UAS Working Group Report. Recommendations 1-4 are for the "initial phase" of UAS (i.e. Phase 1, approximately one to three years upon launch) and Recommendation 5 is for the "subsequent phase". Section 2 of SB 1208 (currently in development) requires the Commission to launch a concurrent application system (CAS) for ESA, CARE, and FERA programs, at a minimum. This is equivalent to the "initial phase" referenced in the UAS Working Group recommendations. The scope of LIOB recommendations presented in this report pertain to the "subsequent phase" referenced in Recommendation 5, following the Phase 1 launch of CAS.

All UAS Working Group recommendations provided below align with SB 1208 intent and objectives for a low income utility program CAS to:

- Improve all low-income utility customer assistance program application processes and maximize upfront data sharing in order to reduce outreach and enrollment expenditures and increase participation by eligible individuals and families.
- Maximize the use of existing and future technologies in order to facilitate the outreach and enrollment processes for low-income utility customer assistance programs.
- Coordinate the enrollment process for those programs between agencies and public and private utilities.
- Complement, rather than replace, existing application processes for each of those programs.[11]

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[9] D.21-06-015, Section 6.2, pg. 119

[10] D.21-06-015, Section 6.2.3.5 UAS, pg. 130.

[11] SB 1208, Section 1, Intent of the Legislature

The LIOB subcommittee was interested in alignment between UAS Working Group recommendations and specific principles for CAS to:

❖ *Principle A*: Streamline customer enrollment and post-enrollment verification in CPUC energy and water assistance programs.

❖ *Principle B*: Facilitate enrollment opportunities of assistance programs administered by the state and public and private utilities.

❖ *Principle C*: Maximize data sharing to promote greater public awareness of and participation in target programs.

Each of the recommendations below note which of these three principles the recommendation connects to and how.

Recommendation 1 (Initial Phase): Continue to pursue UAS in Three Ways

(1) Leverage the efforts of the California Department of Social Services' (CDSS) Statewide Verification Hub (SVH), which can help verify income of applicants for multiple programs without the customer providing proof of income. SVH is currently in development and will not be ready to leverage until a later stage of UAS/CAS. See next section for more information on the Statewide Verification Hub.

❖ *Principle A*: Leveraging SVH will help automate the income verification process for programs, thereby streamlining the enrollment process for customers and reducing the administrative burden on the customer to provide proof of income for multiple programs.

❖ *Principle C*: Leveraging SVH supports data sharing to promote participation in multiple programs.

(2) Determine the scope of UAS programs. IOUs noted that UAS should not include non-IOU related programs using Public Purpose Program Surcharge (PPPS) funds.

❖ *Principle B*: this recommendation relates to facilitating enrollment in multiple customer assistance programs, but is primarily seeking information and clarification on which customer assistance programs (IOU and non-IOU) be scoped into CAS. The UAS report highlights the need for separate funding sources from PPPS to support any integration of any programs that are not IOU or energy programs.

(3) Solicit for an RFI to better understand, with a more refined UAS scope, the timeline and costs required.[12]

❖ This recommendation supports implementation of UAS but does not connect back to any of the three principles specifically.

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[12] A Request for Information for a concurrent application system (CAS) was released by PG&E on March 15, 2023. CAS scope includes ESA, CARE, and FERA programs and will gather more information on the estimated time and budget to include additional energy IOU programs and other design features per the recommendations of the UAS Working Group. The final scope for Phase 1 of CAS will be determined before a Request for Proposals in released.

Recommendation 2 (Initial Phase): Program Integration in Addition to CARE, FERA, and ESA
Expand the launch-day program offerings beyond the limited required programs of CARE, FERA, and ESA to include system integration for bill arrearage programs, referrals for non-IOU programs (e.g., Community Services Department (CSD) programs and Access Clean California), and information regarding health, safety, and resiliency programs. A launch with a more robust portfolio of programs may create more customer value at the inception and may generate momentum towards broad adoption.

❖ *Principle A*: Additional integration of income-qualified programs at launch supports streamlining of the enrollment process under a single UAS platform.
❖ *Principle B*: Supports facilitating enrollment opportunities for multiple customer assistance programs through integration with UAS.

Recommendation 3 (Initial Phase): Additional UAS Technical Features
Incorporate a feedback mechanism to show customers the status of their application. This would likely increase customer confidence and make for a more successful UAS. In addition, technical features should:

- Allow a customer to complete one application for multiple programs
- Support multiple registration pathways (i.e., online, in-person, by phone, text, or email)
- Support homeowners, renters, building managers/owners on behalf of tenants
- Support data sharing of application information and energy usage information with program partners, clean-energy program administrators, and other implementers

❖ *Principle A*: Recommended technical features support streamlining the enrollment process for multiple programs in UAS, including a feedback mechanism to allow users to check the status of their application.
❖ *Principle B*: Recommended technical features support facilitating enrollment opportunities for multiple customer assistance programs.
❖ *Principle C*: Recommended technical features support data sharing across programs to promote participation in program targeting and eligibility determination.

Recommendation 4 (Initial Phase): Involve Stakeholders During UAS Development
Involve various stakeholders throughout the design process, which should lead to a UAS that is more user-friendly and grounded in the reality of the assistance program landscape of California.

❖ This recommendation supports implementation of UAS but does not connect back to any of the three principles specifically.

Recommendation 5 (Subsequent Phase): Integrate Other Low-Income and Clean Energy Programs as Much as Possible
The UAS should strive to link or refer to other low-income and clean energy programs that would not be able to be integrated into UAS otherwise. Not all program software systems will be capable of a direct connection with UAS to facilitate a clean handoff, especially at launch. UAS should have a blend of integration and lead generation options to integrate with a variety of income-qualified programs as much as

possible, such as by linking or referring to the application system(s) of those programs.

The Working Group identified three categories of integration for programs in UAS: (1) programs a customer can apply for through UAS and not need further input; (2) programs that require intervention by a third party after the customer submits an application; (3) programs that will be integrated in a referral manner, where a customer would not be able to apply directly within the UAS. The level of integration with UAS should be considered based on each program's enrollment process and program rules, as well as other constraints that may limit the ability of a program to fully integrate into a UAS.[13]

- ❖ *Principle B*: Program integration with UAS to enable application submission, or program referral or lead generation, through UAS supports facilitating enrollment opportunities for multiple customer assistance programs, including energy and water programs.
- ❖ *Principle C*: Including multiple programs in UAS supports data sharing between UAS and income-qualified program to increase enrollment. Some programs may have difficulty or limitations to fully integrate with UAS (customer completes application in UAS), in which case providing links or referrals to those other programs will also maximize UAS data sharing with programs.

 For more information about the full UAS concept proposed by the UAS Working Group, see Appendix A for a flow chart with a description of the process flow and customer journey through a UAS.

California Statewide Automated Welfare System (CalSAWS) and Statewide Verification Hub (SVH)

The UAS Working Group Recommendation Report offers a roadmap for pursuing a universal application for CARE, FERA, and ESA programs. SVH and CalSAWS both represent technology innovations aligning with the goals of SB 1208 to develop methods and processes enabling low-income customer to concurrently apply to multiple low-income customer programs and simplify the process for confirming applicant eligibility and enrollment.

Per federal requirements by the Centers for Medicare and Medicaid Services (CMS) and Food and Nutrition Services (FNS), California is required to implement a single statewide automated welfare system (SAWS) by December 31, 2023 to ensure continuing receipt of federal financial participation (FFP) for SAWS development, implementation, and ongoing maintenance and enhancements (M&E). Currently there are two separate systems, now managed under a single CalSAWS Consortium governance structure: the 40-County CalSAWS supports Los Angeles County and the 39 former Consortium IV (CIV) system counties, and the CalWORKS Information Network (CalWIN) system supports 18 counties.

The CalSAWS project is a Joint Powers Authority developed and directed by the 58 counties. On September 27, 2021, the CalSAWS project migrated the 39 C-IV counties to join Los Angeles County in forming a 40-county CalSAWS system. The remaining 18 CalWIN counties will migrate to CalSAWS to form a 58-county

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[13] UAS Working Group Recommendation Report, July 1, 2022: https://pda.energydataweb.com/#!/documents/2626/view

CalSAWS system in a series of conversion waves from October 2022 through October 2023. Once the migration of the remaining CalWIN counties to the CalSAWS system is complete, the CalSAWS will be the eligibility determination and case management system for the entire state, in alignment with the federal mandate. County eligibility workers utilize CalSAWS to assist with eligibility determinations for over 14 million Californians seeking assistance with health coverage, access to food, cash assistance and supportive services. As new policy initiatives are implemented to support the needs of underserved populations in California, CalSAWS plays a critical role in developing automated processes.

The CalSAWS Project and Consortium will serve as the state's primary automated welfare business process and case management system for county eligibility staff managing public participation in CalWORKs, CalFresh, Medi-Cal, Foster Care, Refugee Assistance, County Medical Services Program, and General Assistance/General Relief to children, families, and individuals in all 58 California counties. In serving as the state's primary case management system, CalSAWS will encompass the following functions: eligibility determination, benefits calculation, benefits issuance, and information management.

The Statewide Verification Hub (SVH) is a multi-department Information Technology (IT) solution with California Department of Social Services (CDSS) and Department of Health Care Services (DHCS), that will improve California families' access to services by streamlining the eligibility verification process for many California Health and Human Services Agency (CHHSA) means-tested programs, with initial efforts focusing on CalFresh, CalWORKs, child care programs, and Medi-Cal. While upholding Californians' privacy and security, the new IT effort will develop a modernized and leverageable Hub that will connect eligibility case management systems with near real-time data, such as income information, identity validators, non-cash assets, demographics, vital statistics, immigration status, etc. This data is necessary to support eligibility and benefit level determinations for means-tested human services programs, as well as federally mandated Income Eligibility Verification System (IEVS) data matches. The SVH solution will assist in bringing key programs together with the common goal of producing fast and accurate verification for eligibility determinations for needs-based programs. The SVH is a technological innovation that will streamline client access and experience with applying for and submitting document for programs, simplify business process for county workers, improve the accuracy rates and reduce incorrect benefit determinations, and improve service delivery by providing a scalable solution that links authenticated data across department and programs.

SVH and CalSAWS both provide technology innovations that align with the goals of SB 1208. By establishing effective means of system integration and data sharing between UAS and SVH and CalSAWS technology systems, the CPUC can advance the functionality of the UAS to provide accurate and timely income eligibility verification of utility applicants and provide gateways for utility applicants to apply for assistance with other low-income assistance programs. In addition, the CPUC can leverage this system integration to perform more robust forms of program penetration analysis of core energy assistance programs and establish means for targeting assistance to low-income individuals and households not actively participating CARE, FERA, Lifeline, and ESA programs.

IV. ULTS Third-Party Administrator Contract

OPPORTUNITIES AND CHALLENGES TO EXPAND THE CONTRACT

Opportunities and challenges to expand the third-party administrator contract for the Universal Lifeline Telephone Service Program to encourage stronger program coordination between CPUC water, gas, electric, and telephone customer assistance programs and the development/implementation of innovative intake strategies and systems to streamline customer application, enrollment, and post-enrollment verification in these programs.

Opportunities and Challenges

There are numerous challenges to expanding the current third-party administrator (TPA) contract for the Universal Lifeline Telephone Service Program to accommodate additional services for coordination and enrollment between CPUC water, gas, electric, and telecommunications programs. The Lifeline TPA contract was competitively bid under the direction of the California Department of Technology (CDT). CDT confirmed the Lifeline TPA contract "cannot be amended to include water, gas, and electric utility services for the purposes of facilitating enrollment between low-income assistance programs because it deviates from the original contract scope" and the contract "did not contain any language to include additional enrollment determinations for other services."[14]

There are several challenges and barriers identified by CDT to expand the Lifeline TPA contract to include any services for other water, electric, gas, or telecommunications programs.

- CDT is guided by the State Contracting Manual which states that "an amendment must be within the original scope of the purchase document solicitation; if it is not, it must be treated as a non-competitively bid transaction."[15] Including other programs in the scope would qualify as a non-competitively bid transaction, which would open the contract to additional public scrutiny given the high value of the contract, and invite risk to the State for unfairly awarding the contract without the necessary competitive solicitation process.
- Any amendment to the contact requires the approval of the current Contractor, Maximus US Services, and CDT. Some considerations for the Contractor and CDT to approve any amendments, in addition to the risk noted above, include potential for diverting the Contractor's focus away from

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[14] Letter from CDT on Lifeline TPA contract expansion, provided via email to SB 1208 Subcommittee members on March 15, 2023. See Appendix B for full statement.

[15] State Contracting Manual: Volume 2, Chapter 1805

current Lifeline enrollment services and inadvertently degrading their ability to implement current duties and services for the Lifeline program.

- Amendments to the contract, especially those that include new areas of work with other programs, may require new language that conflicts with the current Lifeline TPA contract, or there may be disagreement on how the services should be conducted. This could ultimately cause issues with discrepancies in the contract and prolong the contract amendment process.

For the LifeLine TPA contract to accommodate additional services for coordination and enrollment between CPUC water, gas, electric, and telecommunications programs, program-specific TPA staff and their associated costs would need to be added, in addition to each program-specific functionality requirement covered by their own funding stream separate from the Universal LifeLine Telephone Service Trust Committee Fund (0471).

Any further consideration of the opportunity to amend the Lifeline TPA contract with a specific change in scope would need to be evaluated by CDT as an authority on the IT state contracting process.

V. Recommended Action Plan

SHORT- AND LONG-TERM RECOMMENDATIONS

The LIOB held numerous public meetings and performed extensive review of the administrative structure of the Lifeline program, strategies to promote the co-marketing of CARE and ESA programs, data sharing to facilitate streamlined enrollment in low-income utility discount program offerings of regulated energy and water utilities, and review of working models of technology-based application systems deployed within California and by other states. Through these efforts the LIOB identified that in order to accomplish the goals of SB 1208 and to best position the expansion of the TPA of the Universal Lifeline Telephone Service program, the LIOB identified four specific areas of program implementation where the objectives of SB 1208 directly impact:

- Marketing and Outreach
- Cross Program Coordination
- Enrollment Practices and Systems
- Program Evaluation and Oversight

Accordingly, the LIOB developed a series of specific actions and strategies essential to advancing the state of current enrollment systems and methods to facilitate an iterative approach to advancing co-enrollment across all CPUC low-income utility assistance program and revamping the structure of the TPA contract of the Universal Lifeline Telephone to incorporate responsibilities and functions in support of this goal.

Marketing and Outreach

Short-term Strategies (one to two years)

- Develop co-marketing strategies for all low-income utility programs under the purview of SB 1208. Emphasis shall be placed on developing viable co-marketing strategies for inclusion in the next competitive procurement for the TPA Universal Lifeline Telephone Service Contract.

- Develop focused marketing and outreach strategies to specifically orient to increasing awareness and participation in low-income utility assistance programs within customer segments considered hard-to-reach, tribal areas, undocumented immigrant and other geographic areas where participation is low or below the norm.

- Equally promote each program with co-marketing to the greatest extent possible.

Long-term Strategies

- We recommend the following be included in Legislation that requires the Commission to establish guidelines, administer and regulate:

- o Implement co-marketing strategies with the next contract award for the TPA and across all energy, water, and telecommunication programs.
- o Establish systems of reporting and monitoring to track the success of co-marketing strategy implementation and results.
- o Equally promote each program through co-marketing. "Equally" shall be defined as dedicating the same amount of measurable resources to promote each program and benefit.

Program Coordination

Short-term Strategies (one to two years)

- Following the expiration of the existing TPA contract or as soon as is otherwise feasible to exit the existing contract, pursue new TPA contract. This shall incorporate specific directives and requirements to achieve more expansive program coordination and deepen administration ties across all CPUC water, gas, electric, and telephone customer assistance programs.

- Using enhanced program coordination between utility administrators of water, energy, and telecom assistance programs implement co-marketing and coordinated enrollment strategies to simplify customer enrollment in energy, water, and telecommunication assistance programs. Coordinated enrollment strategies shall emphasize the use of joint applications and intake systems, data sharing, and categorical enrollment to enable a customer's enrollment in multiple programs. The deployment of coordinated enrollment and co-marketing strategies shall occur after the execution of the new TPA contract for the Universal Lifeline Telephone Service program.

Long-term Strategies

- Recommend that CPUC pursue rulemaking to unify eligibility requirements across all low-income utility assistance programs under the CPUC's regulatory authority and issue directives to utility program administrators to encourage the use and adoption of co-enrollment strategies across water, energy, and telecommunication assistance programs.

- The Commission and Legislature may also consider coordination with the CalSAWS system to explore how to provide a one-stop user experience for public assistance programs that transcend portfolios across the CPUC and HHS.

Streamlined Enrollment and Data Sharing

Short-term Strategies (one to two years)

- Recommend CPUC pursue rulemaking to establish a legal and technology framework to facilitate the cross-system sharing of energy, water, and telecommunication customer data between utility company administrators for purposes of providing streamlined enrollment, improving program marketing and outreach, and program evaluation.

- The UAS Group Recommendation Report offers a roadmap for pursuing a universal application for CARE, FERA, and ESA programs. The CPUC undertake efforts to evaluate the feasibility for expanding and extending use of the contemplated universal application system to the full suite of low-income utility assistance programs under the CPUC's regulatory authority to include CARE, FERA, ESA, and Lifeline programs.

- Recommend CPUC pursue rulemaking to establish categorical eligibility across all programs under the purview of SB 1207 and in accordance with applicable federal rules and guidelines.

- Leverage the UAS Working Group recommendations to inform the development of a technology and data sharing roadmap to guide the implementation of a single-application system for CPUC Energy, Water, and Telephone customer assistance programs and identify viable data sharing strategies having the potential to expedite eligibility verification processes. Viable data sharing strategies shall place immediate focus on implementing a workable data sharing model for specific use within CPUC Energy, Water, and Telephone low-income customer assistance programs first.

Long-term Strategies

- Identify barriers or challenges to data sharing between HHS programs that verify income eligibility by household and CPUC Energy (IOUs), Water and telephone customer assistance programs and what would be needed to solve these barriers to enable a single application system across CPUC and HHS low-income programs.

- Build an implementation plan to enable a single application system across CPUC and HHS low-income programs.

- Explore the potential for verifying customer income eligibility and identity using state tax filing records maintained by the California Franchise Tax Board.

Program Evaluation and Monitoring

Short-term Strategies (one to two years)

- Recommend CPUC pursue rulemaking to establish universal program evaluation using consistent metrics and data collection to measure market penetration of energy, water, and telephone low-income customer assistance programs and effectiveness of co-marketing and -enrollment strategies. Evaluation should place emphasis within ensuring investments and resources supporting tailored marketing and outreach to hard-to-reach populations, tribes, and underserved areas are on balance with need.

- As part of the evaluation and monitoring effort, the Legislature may consider asking the Commission to provide a baseline penetration rate across all programs that is compared to the penetration rate once a new contract is in place as specified intervals of time.

Appendices

Appendix A: UAS System Concept

UAS Working Group System Concept
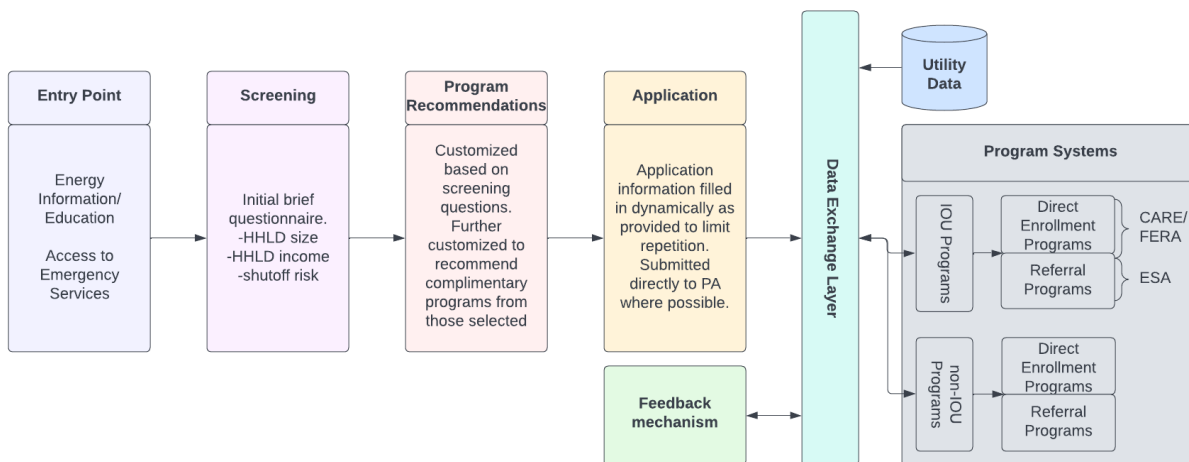
The final concept flow chart, having evolved throughout the sub-working group, describes the process flow of the customer journey through a UAS. The diagram is not a recommendation for system design or user interface, but rather how the sub-working group envisions the process to be.

Entry Point. The entry point is where a customer enters the portal. This front page could be unique for each type of user – a utility customer, a property owner or property management company, a third party like a CBO assisting a customer, or others. This section would also contain various critical safety and resiliency information such as PSPS events happening in the customer's area.

Screening. The screening is the initial questionnaire for program eligibility. Per discussion during sub-working group sessions, this questionnaire should be as short as reasonably possible and be written in plain language. For example, "Do you need help paying your energy bill?"

Program Recommendations. The customer would then be provided a list of programs for which the customer may be eligible, packaged in a way to deliver the most value to the customer. For example, complimentary programs such as bill assistance programs or weatherization programs, would be presented together so that the customer would see that there are multiple programs available to address a need.

Application. The UAS would then provide the customer with one form that would satisfy the requirements to complete applications for all the programs selected. Once submitted, the system would parse that information and fill out the multiple applications automatically behind the scenes. This allows for a user-friendly experience.

Feedback Mechanism. The UAS sub-working group sessions repeatedly discussed implementing some sort of feedback mechanism for customer confidence in the progress of their applications. The depth and complexity of the feedback mechanism would be left to the development team, pending feasibility, should the CPUC decide to move forward with the UAS. The feedback mechanism would indicate, at some level of depth, the application status of programs the customer selected and applied for. This could range from a simple "received," "completed," or "denied," to an integrated process where the customer can track an application status via UAS.

Data Exchange Layer. This is the core of the UAS and connects the customer provided information from the application, the utility data, and any other 3rd party integrated data. It will process the information to provide recommendations to the customer, help transmit the application to program systems, and funnel an application status back to the feedback mechanism. In a hypothetical example, a specific program may require the customer needing to be a utility customer for 12 consecutive months. That tenure information would be sent from Utility Data to the Data Exchange Layer, and if the customer selected that program, the Program System would use the data stored in the Data Exchange Layer to verify that the customer met that requirement without the customer needing to be asked the question.

Utility Data. Necessary utility data will permit customer screening for specific programs that a customer would be eligible for. The sub-working group has determined that such data could be sensitive in nature and necessary measures must be taken to ensure customer and utility data is protected.

Program Systems. These are the systems of all the individual programs being served by the UAS. At various levels of integration (*i.e.*, direct enrollment or referral), the UAS will deliver the application on behalf of the customer. The program systems would also provide application status information to the UAS system to as part of the feedback mechanism.

Appendix B: CDT Response

Email from California Department of Technology (CDT)

The contract for the third-party administrator (TPA) of the Universal Lifeline Telephone Service program cannot be amended to include water, gas, and electric utility services for the purposes of facilitating enrollment between low-income assistance programs because it deviates from the original contract scope. A new contract should be competitively bid to avoid any perception of gifting State funds, introducing errors or contradictions into the current Universal Lifeline Telephone Service TPA contract, and objection from the California Department of Technology (CDT) or the current contractor, Maximus US Services, Inc.

The Universal Lifeline Telephone Service TPA contract was competitively bid through a Request for Proposal (RFP) under the direction of the CDT and did not contain any language to include additional enrollment determinations for other services. Per the State Contracting Manual (SCM), Volume 2, chapter 1805, "an amendment must be within the original scope of the purchase document solicitation; if it is not, it must be treated as a non-competitively bid transaction." The contract has been previously scrutinized and protested because of the high dollar value, so adding scope as a non-competitively bid transaction would invite more scrutiny; the public may perceive this as the State unfairly awarding this contract without the proper competition.

The addition of enrollment services would be difficult as this would add 4-5 program areas within CPUC to develop the new scope. The new program areas may add or require language that conflicts with the current Universal Lifeline Telephone Service TPA contract. They may also disagree on how the services should be conducted. This could prolong the additional scope or cause issues with discrepancies throughout the contract.

The new services would require the current contractor, Maximus US Services Inc., to expand their enrollment activities to include water, gas, and electric utility services. This could potentially lead to Maximus US Services, Inc. to split their focus from the Universal Lifeline Telephone Service enrollment and inadvertently degrade their duties in one or more areas. This would also require the approval of the Contractor, Maximus US Services, Inc. as well as CDT. The amendment language in the contract states, "The Contract may be amended, consistent with the terms and conditions of the Contract, and by mutual consent of both parties, subject to approval by the CDT Statewide Technology Procurement under Public Contract Code (PCC) Section 12100."

A new contract should be competitively bid to implement the enrollment for the water, gas, and electric low-income assistance programs. The formal acquisition method should be utilized under the direction of the CDT, as the cost will likely exceed $1,000,000.00 and CPUC's purchasing delegation. An RFP must be created as the services are complex and carry an elevated risk (SCM, V. 2, chapter 1406.2). The RFP would allow for the phased approach to procure the enrollment services equitably because it would provide an equal opportunity to all Contractors to provide a proposal. The State would create their requirements in an RFP, and then evaluate the responses based on the administrative, technical, and cost evaluation criteria set forth in the RFP.