



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Order Instituting Rulemaking on the
Commission's Own Motion to Address the Issue
of Customers' Electric and Natural Gas Service
Disconnection.

Rulemaking 10-02-005

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) OPENING COMMENTS
ON THE ADMINISTRATIVE LAW JUDGE'S RULING PROVIDING OPPORTUNITY
FOR COMMENTS AND ADDRESSING OTHER PHASE II ISSUES**

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September 15, 2010

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I.

INTRODUCTION

Pursuant to the Administrative Law Judge's Ruling Providing Opportunity for Comments and Addressing Other Phase II Issues (the Ruling), dated August 26, 2010, Southern California Edison Company (SCE) comments on the issues identified in Decision (D.)10-07-048 and Attachment A of the Ruling.

On July 30, 2010, the California Public Utilities Commission (the Commission) issued the Interim Decision Implementing Methods to Decrease the Number of Gas and Electric Utility Service Disconnections which ordered the Investor Owned Utilities (IOUs) to implement several measures to assist customers in these difficult economic times. In that Decision, the Commission also outlined issues to be addressed in the second phase of this proceeding. In doing so, the Commission stated that "There are potentially many other practices which might prove useful in

reducing utility disconnects. However, these other practices may result in significant costs and before they are implemented, we intend to analyze the cost effectiveness of these practices.”¹ SCE appreciates the Commission’s measured approach to implementation of new methods to decrease disconnections and the attention the Commission is paying to the interests of all ratepayers. SCE further notes that as the Commission stated in D.10-07-048, “it is too soon to assess the costs of these two interim practices, or whether the practices will ultimately reduce residential disconnections.”² Given this need for time to adequately evaluate the measures currently in place, SCE urges the Commission to postpone implementation of any further measures that will likely result in significant cost to all SCE customers and may not result in significant added assistance to those customers who are struggling in these difficult economic times.

II.

DISCUSSION

In the Ruling, Administrative Law Judge (ALJ) DeBerry provides the IOUs with an opportunity to comment on certain issues included in phase two of this proceeding, including:

- Allowing customers to choose a monthly billing date;
- Defining “sensitive customers;” and
- Providing exceptions to deposit rules for certain customers demonstrating continued fraud or bad check activities.³

Below, SCE comments on these issues and provides responses to the questions posed by the ALJ in the Attachment to the Ruling.

¹ D.10-07-048, p. 3.

² *Id.*, p. 9.

³ The Ruling, p. 2.

A. There Will Be No Significant Benefit to Customers if They Are Allowed to Choose a Monthly Bill Date

The first issue identified in the Ruling is allowing customers to choose a monthly billing date. SCE has previously commented on this issue in this proceeding.⁴ Particularly, SCE stated that it cannot accommodate this option because there are numerous system and operational obstacles to doing so, including meter reading, call center and bill calculation capacity, bill printing and insertion restrictions, and impacts on working capital and cash flow. There are also impacts on bill exceptions processing. Despite these obstacles, SCE is willing to consider accommodating customers' requests to change their billing date whenever possible within existing system and operational constraints for customers with an installed smart meter and who are enrolled in online billing and online payment. However, there are limitations on the number and volume of requests SCE will be able to accommodate for a specific day due to the system and operation obstacles listed above. Additionally, SCE notes that offering this option to customers will not add advantages over the existing flexibility customers have in choosing when to pay their bill or in making a payment arrangement with SCE. SCE provides customers with 19 days to pay their bill before it is considered past due. Most employers in California pay employees at least twice a month during each calendar month.⁵ Thus, most SCE customers will receive at least one pay check during the 19-day window provided by SCE. Moreover, low income customers are not charged a late payment fee, and therefore have more time to pay their bill without penalty. Thus, given the lack of benefits to justify the costs and operational inefficiencies associated with allowing all customers to change their bill date, this measure should not be implemented.

SCE provides its response to the "Bill Date" questions from Attachment A of the Ruling below.

⁴ See, Opening Comments to R.10-02-005 and SCE Response to ALJ Ruling Requesting Information.

⁵ CA Labor Code Section 207, <http://www.employmentlawhandbook.com/WageHour/State/California.html>.

Question 1A: Are there known advantages to allowing customers to select their own billing date, and if so, what are these advantages?

SCE Response:

There are no confirmed advantages to allowing customers to select their own billing date. In theory, customers may be more likely to pay their bill and avoid disconnection if they have a customized bill date that aligns with when they get their paycheck or other sources of income each month. However, the theoretical advantages provided by this option are already provided to customers under SCE's current policy of providing customers with ample time to pay their bill. SCE does not consider a bill past due until 19 days after the bill is presented to the customer. As discussed above, this provides customers with flexibility in choosing a date to pay their bill that works for them. SCE recognizes that there are many customers, especially given the current economic climate, who will have difficulty paying their bill in the time provided. For these customers who need additional flexibility in paying their bill, SCE offers customized payment arrangements from three to 12 months depending on the customer's individual circumstances.

Given the flexibility that SCE's customers already have in selecting the date on which to pay their bill, and the added flexibility provided by payment arrangement and other options, SCE can identify no significant advantages to allowing customers to select their own bill date.

Question 1B: Would allowing customers to select their own billing date result in less late payments/no-payments? Is there a historical or factual basis to this position?

SCE Response:

SCE is not aware of any studies or historical analyses that either confirm or refute the notion that allowing customers to select a bill date would result in less late payments/no-payments.

Question 1C: What are the potential complications and disadvantages of allowing customers to select their own billing date?

SCE Response:

There are many complications and obstacles related to allowing customers to select their own billing date. First, as mentioned above and in SCE's Opening Comments on R.10-02-005, SCE's billing system can only calculate a limited number of customer bills on any given day. Customizing customer billing dates could significantly impact this overall process if large numbers of customers choose the same preferred monthly billing dates. Second, the processes of printing customer bills, inserting them into envelopes, and then sorting them for postal distribution are constrained by existing capacity and facilities. Third, not all SCE customers will have Edison SmartConnect™ meters until late 2012. Prior to that time, allowing customized bill dates will have a significant impact on the meter reading process. Bill dates are driven by meter read dates. Existing meter reading processes are designed to maximize efficiency by aligning meter read dates by geographical areas. If customers throughout SCE's service territory choose the same bill date, SCE would lose efficiency in the meter reading process and would have to increase meter reading staff to accommodate peak meter reading days. This would also result in days with a low volume of meter reads, resulting in downtime for field resources. At this stage in the Edison SmartConnect™ deployment, SCE is looking to decrease meter reading resources rather than increase them. Such an increase at this time would impact some of the benefits of smart meter deployment. Fourth, similar to losing efficiency in planning the work of field resources, SCE would lose efficiency in planning the work of call center and billing organization resources. If certain billing dates were to become popular with large groups of customers, such as the days surrounding typical pay dates, there would be inefficient peaks and valleys in the volume of customer calls to SCE's call center. SCE's billing exception processing would experience similar peaks and valleys which could impact SCE's ability to provide timely and accurate bills. Finally, customized bill dates may have a negative impact on SCE's working capital and cash flow. This results in inefficient business operations and higher costs for SCE's

customers. If significant numbers of customers choose the same bill dates throughout the month, these inefficiencies would have detrimental impacts on SCE's operations.

Addressing each of these obstacles would result in high implementation and operational costs, which would ultimately be borne by all customers. Some of the complications can be mitigated with existing technology. The meter reading challenge will largely be moot once all of SCE's customers have an Edison SmartConnect™ meter. Some of the bill printing and postage issues can be addressed by requiring customers who want to select a custom bill date to sign up for electronic billing and online bill payment.⁶ Even with these mitigations, however, there will still be significant operational challenges in calculating bills, staffing the call center and billing organization, and managing cash flow. Billing processes are designed to spread operational support needs evenly across the month so that SCE can efficiently staff resources. The fact remains that if large volumes of customers selected a small number of bill dates, SCE will likely not be able to accommodate the shifts in work operationally.

Question 1D: What would be the estimated costs to the [Investor] Owned Utilities (IOUs) of allowing customers to select their own billing date?

SCE Response:

SCE is unable to provide a cost estimate at this time for an unconstrained option for customers to select their own bill date because operational inefficiencies make the task infeasible. As stated above, SCE is, however, willing to consider accommodating customers' requests to change their bill date whenever possible within the existing system and operation constraints for customers with an installed smart meter. As more customers enroll in online billing and payment options, some of these operational constraints will be ameliorated and more customers may be able to take advantage of this option.

⁶ If customers sign up for electronic billing and online bill payment, there is still a resource constraint related to calculating and creating the online bill for presentment.

Question 1E: What would be the estimated costs to the IOUs of allowing only customers at risk of disconnection to select their own billing date?

SCE Response:

As discussed in the response to Question 1D, at this time SCE is not able to provide the estimated cost for allowing customers at risk of disconnection to select their own billing date. SCE notes, however, that implementing this option for a limited group of customers who have not met their obligation to pay their utility bill would be perceived as unfair to the large majority of customers who pay their bill on time.

B. The Commission Should Allow Exceptions to the Waiver of Deposits in Circumstances of Fraud, Returned Checks, and Bankruptcy

The second issue identified in the Ruling is providing exceptions to deposit rules for certain customers demonstrating continued fraud or bad check activities. In cases of fraud, returned checks and bankruptcy, the IOUs should be allowed to request a deposit because these deposits protect all customers from rates increasing over time due to the poor, and oftentimes illegal, choices made by a few customers. Additionally, SCE notes that post-petition bankruptcy deposits are allowed by law.⁷ SCE urges the Commission, for the protection of all customers, to provide an exception to its order regarding deposit waivers for low income customers related to these three circumstances.

SCE provides its response to the “Waiver of Deposit Exceptions” questions from Attachment A of the Ruling below.

Question 2A: Under what terms should a customer be considered to be in “good standing” with an IOU?

⁷ Pursuant to the Federal Bankruptcy Code, 11 U.S.C. § 366(b), utilities are expressly permitted to request adequate assurance of payments from a bankrupt utility customer.

SCE Response:

For purposes of this question, SCE has defined a customer in “good standing” as one who is not required to re-establish credit. SCE currently considers a customer to be in good standing unless he/she is disconnected for non-payment or has two or more returned payments within a 12-month period. A customer who is applying for new service after having a break in service is considered to be in good standing if he/she had prior service within the past two years and paid his/her bills on time and without any disconnections or without two or more returned payments for at least a 12-month period before the end of his/her prior service with SCE. SCE’s current determinations of “good standing” as described above are fair and should be continued in the future.

Question 2B: If applicable, please define your utility’s current policy for determining if a customer is in “good standing” with regards to fraudulent or bad check writing activities, payment defaults, etc.

SCE Response:

SCE uses the criteria described in its response to question 2A above to determine if a customer is in “good standing.” If a customer defaults on a payment arrangement, that does not impact his/her standing because SCE does not use payment arrangement defaults as a criterion for re-establishing credit.

Question 2C: Under what terms should a customer no longer be considered to be in “good standing” with an IOU?

SCE Response:

SCE no longer considers a customer to be in “good standing” for any of the following reasons:

- Two or more returned checks within a 12-month period;

- Two or more insufficient funds events on a bank debit or credit card transaction within a 12-month period;
- Disconnection for non-payment of energy bill or an initial deposit;
- Bankruptcy filing; or
- Involvement in unauthorized energy usage or energy theft.

SCE's current practices used to determine a customer's "good standing" as described above are fair and should be continued in the future.

Question 2D: If applicable, please define your utility's current policy for determining if a customer is no longer in "good standing."

SCE Response:

SCE uses the criteria in its response to question 2C to determine if a customer is no longer in "good standing."

Question 2E: For customers no longer in "good standing" with an IOU, which programs and exceptions are they no longer allowed to participate in (CARE / LIEE, deposit waivers, auto pay sign up, payment plan schedules, etc.)

SCE Response:

SCE customers no longer in "good standing" are eligible for all SCE programs with one exception. If a customer has two or more returned checks during a 12-month period, he/she is considered "cash only" for six months, during which time he/she is not allowed to make a payment by check, direct pay, or electronic funds transfer.

C. The Commission Should Limit the Definition of "Sensitive Customers" to Critical-Care, Elderly, and Disabled Customers

The third issue identified in the Ruling is the definition of "sensitive customers." SCE applauds the Commission's goal of determining which customers require special precautions for

health and safety reasons when they become eligible for disconnection. This issue should address which customers to consider for special precautions and what those precautions should be. The Commission should carefully consider the customer groups it designates as “sensitive.” They should be defined as the subset of customers who require special attention from the IOUs for health reasons, as opposed to broad categorical definitions that result in more customers being deemed “sensitive” than “non-sensitive.” Moreover, the Commission should not limit the means available to the IOUs by which disconnection occurs if the same precautions can be provided to the sensitive customer. For example, providing an in-person utility representative at the time of disconnection should not require that the representative manually disconnect the meter in the field. Allowing that representative to have the meter disconnected remotely provides an additional safety feature because power can be restored significantly more quickly by using the remote switch. SCE urges the Commission to take a measured approach to the definition of sensitive customers and the precautions afforded them, because over-inclusiveness will unnecessarily result in a significant increase in cost to all customers and will result in the erosion of the benefits to customers provided by smart meters.

SCE provides its response to the “Definition of ‘Sensitive Customers’” questions from Attachment A of the Ruling below.

Question 3A: Currently the Commission prohibits the four IOUs from remotely disconnecting the utility service of customers who are denoted in the IOUs records as medical baseline or on life-support. Please identify the customer categories which should receive protection from remote service disconnections.

SCE Response:

SCE does not support the prohibition of remote disconnection for any customer category. Remote disconnection offers an advantage over traditional manual disconnection because, as discussed above, when a premises has been disconnected using the remote service switch, it can also be reconnected using the remote switch. This allows the IOUs to restore service more

quickly, and at lower cost, for customers. Sensitive customers will benefit from remote disconnection and reconnection because their service can be restored more quickly if they are disconnected. SCE recognizes that there are risks associated with disconnection for certain sensitive customers regardless of whether the service is disconnected remotely or manually. Rather than identifying customer categories that should receive protection from remote service disconnection, SCE views the issue as determining which customers should have a representative at the premises prior to and during disconnection to assess and monitor the situation for any risks to health or safety.

The protections provided to sensitive customers, including an in-person visit at the time of disconnection, should be limited to critical-care, disabled, and elderly customers. As SCE stated in its Comments on the Commission's Interim Decision, SCE has enhanced collection and disconnection policies and procedures for its special needs customers. The special needs customer group includes elderly, disabled, and critical care⁸ customers for whom SCE takes additional health and safety precautions prior to disconnecting electric service. Expanding this treatment to include broader groups of customers will be costly for ratepayers without achieving notable advantages in health and safety.⁹ SCE has been using this criterion for its sensitive customers for several years and has received little to no complaints or issues related to disconnections of sensitive customers. SCE plans to continue to provide safeguards to these customers when the remote disconnection capability becomes available.

Question 3B: Does the IOU's current customer database identify

⁸ Critical care customers are those customers who have indicated, in the process of applying for a Medical Baseline allocation, that they would suffer a risk to health or safety if left without electricity for two hours or more.

⁹ SCE Opening Comments to Interim Decision, p. 3, Question A Response 1.

a) Disabled customers

SCE Response: Yes, SCE's customer database has the ability to flag customers who are disabled

b) Elderly customers

SCE Response: Yes, SCE's customer database has the ability to flag customers who are elderly.

c) Medical / life support customers

SCE Response: Yes, SCE's customer database has the ability to flag customers who have provided a doctor's certification that they qualify for the Medical Baseline or Critical Care designation.

d) Households with one or more child under the age of 18 in the home

SCE Response: No, SCE's customer database does not currently have the ability to flag customers with one ore more children under the age of 18 in the home.

Question 3C: If not, can these additional customer classes be clearly identified by the IOU's current customer database systems?

SCE Response:

As a technical matter, SCE's customer database can be modified to include the ability to designate households with one or more children under the age of 18 in the home. However, there would be significant challenges in obtaining, tracking, and maintaining the information, as discussed below in response to Question 3G.

Question 3D: If an IOU does not currently track this demographic customer information, can this information be tracked within the IOU database / system going forward?

SCE Response:

Please see the response to Question 3C.

Question 3E: What are the associated costs of the system changes necessary to track this additional customer information?

SCE Response:

SCE estimates a cost of \$10,000 to make system changes to enable SCE to designate households with one or more children under the age of 18. In addition to these costs, collecting, tracking and maintaining this information could result in significant further costs.

Question 3F: Are there other potential advantages of tracking such information going forward?

SCE Response:

SCE is unaware of any advantages associated with tracking households with one or more children under the age of 18.

Question 3G: What are the potential complications and disadvantages of tracking such information going forward?

SCE Response:

There are numerous complications and disadvantages of tracking those households with one or more children under the age of 18. First, it is unclear how SCE would obtain this information. Presumably, it would primarily be gathered when customers self identify as having a child under 18 in the home, while on the phone with a customer service representative. This would add time to calls and result in increased operational costs. Second, it would be virtually impossible to know when a household no longer qualified for this profile because SCE would not track a child's birthday and the customer would be under no obligation to notify SCE when a

child reaches majority or moves out. Third, in the 2000 United States Census, nearly 40% of California households had children under the age of 18.¹⁰ If this profile were included in the definition for “sensitive” customers who receive additional precautions related to disconnections, it is likely that more of SCE’s residential customers would be classified as “sensitive” than “non-sensitive.”¹¹

III.

CONCLUSION

SCE appreciates this opportunity to provide the Commission with more information regarding the Phase II issues presented in the Ruling.

¹⁰ 2000 U.S. Census (see table 2), http://factfinder.census.gov/servlet/QTTable?_bm=y&-geo_id=04000US06&-qr_name=DEC_2000_SF1_U_DP1&-ds_name=DEC_2000_SF1_U.

¹¹ In the 2000 U.S. Census, 22.3% of California households had individuals aged 65 or over, which is a higher age than SCE currently uses to identify elderly customers (62 or over). Additionally, 16.3 % of the civilian non-institutionalized population under the age of 65 had a disability. While there is certainly some overlap across each of these two categories and households with children under the age of 18, it is very likely that including all three categories in the definition of “sensitive” customers, along with medical baseline and critical care, would result in more than half of SCE’s customers qualifying as “sensitive.” This is especially true when considering the difficulty in tracking which households qualified as having children under the age of 18 at one time but no longer qualify.

Respectfully submitted,

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September 15, 2010

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) OPENING COMMENTS ON THE ADMINISTRATIVE LAW JUDGE'S RULING PROVIDING OPPORTUNITY FOR COMMENTS AND ADDRESSING OTHER PHASE II ISSUES on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **15th day of September, 2010**, at Rosemead, California.

/s/ RAQUEL IPPOLITI

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