

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
(Filed February 4, 2010)

OPENING COMMENTS OF DISABILITY RIGHTS ADVOCATES REGARDING
ALJ DEBERRY'S RULING

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I. INTRODUCTION

By Ruling of August 26, 2010 (“ALJ Ruling”), Administrative Law Judge Bruce DeBerry identified three issues for Comment and Reply: (1) allowing customers to choose a billing date; (2) waiver of deposit exceptions for customers demonstrating continued fraud or bad check activities; and (3) defining “sensitive” customers. Additional issues that had previously been referred to Phase 2 of this proceeding via D.10-07-048 were identified, and parties were informed that they would be addressed through other mechanisms and were not part of this comment cycle. DisabRA submits the following comments, addressing both the specific issue of the definition of “sensitive” customers, as well as the need to address accessible communications for customers who have disabilities that affect their ability to use standard forms of communication, such as people with vision, hearing or speech impairments. This issue has been raised repeatedly by DisabRA, but has yet to be addressed by the Commission.

II. THE DEFINITION OF “SENSITIVE CUSTOMERS” SHOULD EXPLICITLY INCLUDE PEOPLE WITH DISAIBILITIES

The Ruling invites comments on “defining ‘sensitive customers.’”¹ The Commission currently “prohibits the four IOUs from remotely disconnecting the utility service of customers who are denoted in the IOU’s records as medical baseline or on life-support.”² This most basic level of protection for the most vulnerable customers is necessary, but not sufficient. While customers enrolled in these programs clearly have disabilities, there are many more households containing disabled individuals who are not enrolled in the programs, either because they are unaware of them or because their disability does not cause them to use above-average levels of energy. The fact that they are not enrolled in these programs, however, does not mean that they would not be subject to severe harm if they were disconnected. For example, a person who uses

¹ ALJ Ruling at 2.

² ALJ Ruling, Attachment A.

adaptive telephone equipment does not consumer extra energy, but is at risk of being isolated and unable to call for assistance in the event of service disconnection. Moreover, those individuals with disabilities that affect their ability to communicate are at additional risk of being disconnected without having effectively received notice of the situation.³ Thus, the utilities should broadly offer disconnection protection to people with disabilities, and should take steps to effectively identify and track these customers.

A. **At Minimum, The Commission Should Adopt the Working Definition of “Vulnerable Customers” in the Sempra Settlement**

At minimum, the Commission should define “sensitive customers” in a manner consistent with the class of vulnerable customers that has been agreed on by parties to the Settlement Agreement Between San Diego Gas & Electric Company, Southern California Gas Company, Disability Rights Advocates, The Division of Ratepayer Advocates, The Greenlining Institute, The National Consumer Law Center, and The Utility Reform Network Resolving Issues in the Residential Disconnection Proceeding, (Rulemaking No. 10-02-005), submitted to the Commission via Joint Motion on September 9, 2010. This definition includes “self-identified seniors (age 62 or older), self-identified disabled customers, Medical Baseline customers, Life Support customers, or other customers who self-certify that they have a serious illness or condition that could become life threatening if service is disconnected.”⁴ “Self-identified disabled customers” include those who respond to “optional and voluntary language on written LIEE or CARE applications and other customer materials that will allow them to identify themselves or a full-time resident of the customers’ household as disabled. In addition, customers may self-identify as disabled by voluntarily describing themselves, or a full

³ As DisabRA has noted many times, regulated utilities have obligations under both state and federal law to communicate with their customers in an accessible manner. *See* Unruh Act, Cal. Civ. Code § 51 *et seq.*; Disabled Persons Act, Cal. Civ. Code § 54 *et seq.* and the Americans with Disabilities Act, 42 U.S.C. §12182(b)(2)(A)(iii). The ADA is also incorporated into both state statutes. Nevertheless, to date, the utilities have not provided notice of service disconnections or calls regarding service disconnections in any alternative formats.

⁴ Settlement at § II.G.4.

time resident of the customers' household, as disabled to a CSR, or other utility representative." Along with these customers, the proposed settlement also protects any customer in the utilities' databases who was previously identified as disabled.⁵

B. The Utilities Should Be Required to Take Affirmative Steps to Identify Sensitive Customers

The minimum definition set forth above relies heavily on customer self-identification to provide protections; however, customers are likely unaware that any protections are available to certain customer classes. Without this information, they are unlikely to think to self-identify. This presents a dilemma; to the extent that the Commission believes these customer groups are particularly sensitive and thus entitled to protections from remote disconnections, they should be informed of the available protections and given the opportunity to benefit. If the only way to do so is to self-identify without any understanding of how or why, many sensitive customers will be excluded from the intended benefit.

Under the terms of the Sempra settlement, the only customers who are affirmatively invited to self-identify are those customers who are enrolling in the Low Income Energy Efficiency program, who are given an opportunity to self-identify as disabled. While this is a welcome opportunity to identify many customers with disabilities, those people with disabilities who are not low income (and thus ineligible for LIEE) are never invited to self-identify, nor are seniors or other sensitive customers. To the extent that the Commission recognizes that these customer classes should receive protection, the Commission must also take steps to ensure that they are identified and tracked.

DisabRA urges the Commission to expand the circumstances in which the utilities are required to collect data about sensitive customers beyond the terms of the Sempra

⁵ Settlement at note 3.

settlement.⁶ The ALJ Ruling inquires about the utilities' ability to do this on a going-forward basis. In keeping with this, DisabRA suggests that all household initiating service be invited to identify as sensitive, and that existing customers be sent a notice of the protections available to sensitive households and provided information on the option to self-identify. Such notices should be sent annually, ideally as a notice on the customers' actual bill, since many customers do not review bill inserts.

III. PHASE II SHOULD MORE DIRECTLY ADDRESS EFFECTIVE COMMUNICATIONS WITH DISABLED CUSTOMERS

Some customers with disabilities have accessible communications needs that will always affect their ability to receive a utility's communications regarding potential disconnections. DisabRA has repeatedly raised this issue, including submitting a request for a workshop on accessible communications issues and providing multiple comments on the need to accommodate customers with vision, hearing and/or speech disabilities.⁷

⁶ DisabRA recognizes that the Sempra settlement, to which it is a party, would resolve all Phase II issues for the Sempra Utilities, which would exclude them from any additional obligations to conduct outreach and identify sensitive customers. Nevertheless, the settlement provides other substantial benefits to consumers, specifically including disabled consumers. Thus, DisabRA continues to support the settlement without reservation. Assuming the Commission approves the settlement, the additional outreach requirements should be placed on the utilities that have not settled with the consumers. Alternatively, if for any reason the Commission declines to approve the proposed settlement, the Sempra Utilities should also be subject to the outreach provisions described herein.

⁷ In Opening Comments in this proceeding, DisabRA discussed the need for utilities to provide alternative forms of access other than automated calls and written notices as needed for customers who cannot access information through standard forms of communication; DisabRA also requested a workshop on best practices for accessible communication and attached a brochure on effective communication. In Reply comments, DisabRA addressed each utility's communications efforts. In April, DisabRA engaged in a lengthy email exchange with the ALJ regarding the possibility of a workshop on accessible communications; the ALJ concluded that there was no time for such a workshop at that stage of the proceeding, but encouraged informal efforts and suggested a workshop might be scheduled during a subsequent phase. In Comments on the proposed decision that became D.10-07-048, DisabRA reiterated its request for a workshop. While the utilities have engaged in discussions on this issue, no clear actions have been forthcoming.

In addition to these actions during the pending proceeding, DisabRA has repeatedly raised issues regarding accessible communication before the Commission in other contexts, obtaining multiple decisions requiring utilities to accommodate their customers with disabilities that require accommodation. *See, e.g.*, D.10-01-026, mailed January 21, 2010, at 14 (requiring that educational materials about emergency backup power capabilities of telecommunications equipment be provided "in type size big enough to comfortably read" and that these materials also be made available in large print, Braille or audio format for customers who are visually impaired); D.08-11-031, mailed November 6, 2008, at 72-75 (requiring utilities to target their education and outreach efforts for the CARE and LIEE low-income assistance programs to customers with

The Commission previously indicated that this issue would be addressed at some point during this proceeding.

Based on informal communications among the parties, DisabRA understands that this issue might be enfolded in the “Pilot Program” regarding the role of customer service representatives and consideration to allow customers to select a language for utility communications, which will be the subject of a meeting “in the near future.”⁸ While customers should certainly be allowed (and directly invited) to identify preferred modes of communication, whether that be large print, Braille, or some other alternate format, in the same manner in which language preferences can be selected, it is unclear whether the Pilot Program will actually advance the ability of utilities to communicate directly with their disabled customers or whether it will rely instead on third parties such as CBOs, which have far fewer resources than the utilities.

Rather than rely on CBOs, the Commission should ensure that utilities are prepared to communicate effectively with all their customers, as required by state and federal law. This includes identifying disabled customers’ preferred mode of communication, and then subsequently using that mode for customer communications (particularly sensitive communications such as those concerning risk of service disconnection). For blind customers, this will most commonly require alternative formats for printed material. For deaf customers, it will include alternatives to standard voice communications, including automated telephone systems.

Effective communication also requires training for all employees or contractors who will be involved with customer communications. Staff who design printed materials

disabilities, and stating that “[t]he utilities shall ensure accessible ME&O for CARE and LIEE by providing alternate formats for communications”); D.06-12-038, mailed December 14, 2006, at 14-15 (requiring in the context of LIEE program implementation that the utilities’ TTY customer service numbers “be answered in the same manner and with the same efficiency” as standard voice calls and directing the utilities “to include in outreach materials at TTY number that is presented with the same prominence as other contact numbers”); D.07-07-047 at 15 (adopting DisabRA’s proposals to maximize accessibility of bills in the context of PG&E’s application to modify its billing format). A similar order in this matter will provide needed protections for customers with disabilities.

⁸ ALJ Ruling at 2.

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