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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Petition of The Utility Reform Network
to Adopt, Amend, or Repeal a
Regulation Pursuant to Pub. Util. Code
§ 1708.5 Related to Arrearage
Management and Shutoff Prevention for
Residential Customers of the Major
Jurisdictional Electric and Gas Utilities.

Petition 09-06-022
(Filed June 19, 2009)

**RESPONSE OF THE DIVISION OF RATEPAYER ADVOCATES
TO THE PETITION OF THE UTILITY REFORM NETWORK
TO ADOPT, AMEND, OR REPEAL A REGULATION RELATED
TO ARREARAGE MANAGEMENT AND SHUTOFF PREVENTION
FOR RESIDENTIAL CUSTOMERS OF THE MAJOR JURISDICTIONAL
ELECTRIC AND GAS UTILITIES**

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July 23, 2009

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Petition of The Utility Reform Network to Adopt, Amend, or Repeal a Regulation Pursuant to Pub. Util. Code § 1708.5 Related to Arrearage Management and Shutoff Prevention for Residential Customers of the Major Jurisdictional Electric and Gas Utilities.

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I. SUMMARY

On June 23, 2009, The Utility Reform Network (“TURN”) served a petition pursuant to Public Utilities Code section 1708.5, asking the Commission to adopt, amend, or repeal a regulation related to arrearage management and shutoff prevention for residential customers of the major jurisdictional electric and gas utilities, (“Petition”).¹ Pursuant to Rule 6.3 of the Commission’s Rules of Practice and Procedure, the Division of Ratepayer Advocates (“DRA”) files this response to TURN’s Petition. The Commission should adopt TURN’s petition with DRA’s proposed modifications provided in the instant response.

¹ The Petition was filed on June 19, 2009, but the docket office instructed TURN to re-serve the document on June 23, 2009. Rule 6.2(d) provides that responses to a petition are due “30 days of the date that the petition was served.” For clarification, DRA contacted the docket office on July 7, 2009. The docket office informed DRA that the official service date was June 23, 2009 and therefore, responses would be due on July 23, 2009.

DRA supports TURN's petition that the Commission's policies should ensure essential energy services be affordable and service termination is minimized. To accomplish these objectives, the Commission should first direct California's electric and gas Investor Owned Utilities (IOUs) to proactively employ existing energy assistance programs to help customers reduce their bills and avoid shut offs. Second, the Commission should allow parties an opportunity to collect the data from the utilities to see whether or not the current assistance programs, tariff rules, and the utilities' own initiatives are adequate in preventing customers from losing essential electric and gas services especially during this severe economic downturn. Afterwards, parties should file comments on how to best address the issues raise by TURN in this petition to ensure that the Commission's policies are adequate in providing customers affordable, essential services. Finally, DRA requests that the uncollectible issue be excluded from this petition as the issue is more appropriately addressed in general rate cases ("GRC"), where they always have been, and the Commission should avoid duplicating efforts on the same issues.

II. BACKGROUND

The Petition asks the Commission to open a rulemaking, or an investigation, to consider amending and adopting regulations associated with residential customer arrearage management, credit deposits, deferred payment plan policies, and the ratemaking treatment of utility uncollectibles, for application to Pacific Gas and Electric Company ("PG&E"), San Diego Gas and Electric Company ("SDG&E"), Southern California Edison Company ("SCE"), and Southern California Gas Company ("SoCalGas"). TURN states that it submits this petition in light of the unfortunate convergence of an economic crisis in California and recent and impending utility rate increases. (Petition, p. 1.) TURN urges the Commission to ensure that its policies going forward provide consumers with optimal opportunities to manage arrearages and avoid service termination; and suggests that now is the perfect time for the Commission to commence an investigation and rulemaking toward this end. (Id, p.2.)

TURN notes that the Californians who take electric or natural gas service from the investor owned utilities (“IOUs”) regulated by the Commission have access to a variety of programs intended to increase the affordability of essential utility services. These include the California Alternative Rates for Energy (“CARE”) program, the Low Income Energy Efficiency (“LIEE”) program, the Family Electric Rate Assistance (“FERA”) program, and the federal Low-Income Home Energy Assistance Program (“LIHEAP”). TURN observes that despite these energy assistance programs, large numbers of households (almost a quarter of PG&E and SCE’s CARE customers and about 15 to 20% non-Care customers) continue to fall behind in utility payments, and tens of thousands of households are shutoff for nonpayment each month. (Petition, pp. 3-7.) TURN warrants that policies intended to reduce arrearages and prevent shutoffs during this economic crisis deserve the Commission’s immediate attention. TURN proposes that the Commission open a rulemaking or investigation to look into arrearage management and forgiveness, changes to existing payment plan policies, re-establishment of credit deposits, and the appropriateness of temporary changes in the ratemaking treatment of utility uncollectibles.

III. PETITION TO OPEN A RULEMAKING OR AN INVESTIATION UNDER SECTION 1708.5

Public Utilities Code section 1708.5 permits “interested persons” to petition the Commission to “adopt, amend, or repeal a regulation.” (§ 1708.5(a).) The Commission has six months to issue a decision that either denies the petition or opens a proceeding as requested. (§1708.5(b) (1).) The Commission may extend that time to allow for public review and comment of the proposed decision. (§1708.5(b) (2).)

IV. DISCUSSION

A. Energy Utilities Should Aggressively Champion Energy Assistance Programs To Reduce Customers' Energy Bills and Prevent Disconnections.

The Petition requests that the Commission issue a new proceeding (either Rulemaking or Investigation) to assist the customers who may be in danger of losing their energy services or whose services were already terminated in light of the current economic crisis and the impending utility rate increases. (Petition, p.1.) DRA supports the Petition and the issuance of a new proceeding. At the same time, DRA stresses that the IOUs already have many tools to assist customers. The IOUs should not wait for the outcome of the proposed proceeding to aggressively employ those tools to help customers stay connected to the system. The Commission should provide immediate direction for the IOUs to aggressively promote the programs that have been adopted and funded for the State of California's LIEE and CARE programs.

As TURN points out, IOUs have a full range of customer assistance options, from significant discounted energy rates, conservation incentives, and emergency cash grants, that they can offer today, which are already authorized in rates. These assistance programs can help the customers significantly reduce their energy bills, make the services much more affordable and hence, reduce the possibility of customers' services being terminated. Since these programs are already authorized in rates, they are likely the most cost effective ways of keeping electric and gas services affordable and prevent shut offs. DRA urges that the IOUs proactively and aggressively campaign to deliver the assistance packages to their customers who have incurred hardships. In addition, DRA recommends that the Commission monitor and track the IOUs' progress.

Historical CARE program enrollment data indicates that it may substantially reduce the percentage of accounts pass due. A National Association of Regulatory Utility Commissioners (NARUC) survey conducted in 2008 showed that California's percentage of residential accounts past due dropped from 36.5% to 15% from 2001 to 2004 which coincides with the increased CARE enrollment from 65% to 79% during the same

period.² The current CARE enrollment rate remains close to 80%. To potentially increase enrollment, the IOUs should take the opportunity during all customer-initiated calls to explain and offer programs to qualified customers if they have not yet signed up; or IOUs can initiate calls to targeted customers who are late in payment and may be qualified for the programs. Aggressively campaigning to make customers aware of these programs and proactively enrolling qualified customers will likely reduce customers' non-payments and shut-offs, and decrease the utilities' costs associated with these activities.

B. DRA Supports TURN's Petition that the Commission's Policies Should Ensure Consumers with Affordable Services and Avoid Service Termination.

In the Petition, TURN proposes that the Commission initiate a new proceeding to review the following major issues³ (Petition, p.9.):

1. Should the major jurisdictional electric and gas IOUs be required to create arrearage management programs and offer arrearage forgiveness plans to low income customers in arrears? If so, how should these arrearage management programs be structured, in terms of (a) participant eligibility, (b) program administration, (c) program parameters, and (d) cost recovery?
2. Should the terms and conditions of payment plans extended to all residential customers be modified to increase the likelihood that customers in arrears will be able to afford to comply with payment requirements and avoid shutoff, such as (a) through explicitly considering customer ability to pay, (b) extending the term of amortization, and (c) requiring utilities to offer LIEE or EE services to customers seeking payment arrangements?
3. Should the utilities be prohibited from requiring residential customers to pay reestablishment of credit deposits under certain circumstances, such as when customers agree to (a) participate in the LIEE or EE program, or (b) receive budget counseling?

² "2008 Individual State Report by the NARUC Consumer Affair Subcommittee on Collections Data Gathering", Approved on 11/17/2008, at 45. "CARE Enrollment", DRA presentation to the Low Income Oversight Board, June 25, 2009, at 3.

³ The 4th issue is not shown here, it is addressed in the following section of this comment.

The data DRA received so far from some of the energy utilities did not show apparent upward trends regarding the percentage of customers being terminated. However, TURN's petition shows that a large percentage of customers have difficulty in making their payments when their bills are due; and tens of thousands Californians are disconnected from the energy services monthly. (Petition, pp. 5-7.) The same arrearage data shows significant disparity between PG&E and SCE. (Ibid.) TURN also states that if a customer is struggling financially, it would only increase his financial strain if he is required to pay additional deposits to be reconnected back to the system. (Id., pp. 16-17.) DRA agrees that this is a concern.

Because electric and gas services are essential to daily lives, the Commission cannot ignore the problem that many Californians are not able to afford these basic services, and the current economic downturn has certainly aggravated the situation. Therefore, DRA agrees that many of the above-mentioned issues raised by TURN be evaluated.

However, the data and information currently available to the Commission are not sufficient to identify what the main issues are. Thus, DRA recommends that the IOUs provide some foundational information to DRA and other interested parties to better understand the problems, so DRA can suggest how best to address them. DRA and TURN have already been working with the IOUs to obtain customer payment and disconnection data. DRA has currently received from SCE, PG&E, SDG&E, and SoCalGas some requested information. Details of the requested data and what SoCalGas and SDG&E have agreed are provided as Attachments A.⁴ DRA is hoping that this data will shed some light on identifying the indicators of customer difficulty in paying bills, which will lead to designing appropriate IOU plans and responses to increased customer difficulty. Additional key questions might need to be explored after the data is examined.

⁴ PG&E and SCE have informally also agreed to provide such data.

DRA recommends that once discovery is completed and parties have had an opportunity to review and analyze the data, the Commission provide an opportunity for the parties to file additional comments to better frame the issues and identify the scope of the proceeding, accordingly. Within the comments, the parties should provide their recommended scope and schedule, and identify whether hearings are necessary or not.

C. DRA Recommends that Uncollectible Issues be Removed from Consideration in this Petition.

The 4th scoping issue identified in TURN's petition is:

Should the ratemaking treatment of electric and gas utility uncollectibles associated with residential customer accounts be modified to subject some or all of these costs and revenues to 2-way balancing account treatment on a temporary basis?

DRA opposes the inclusion of the uncollectible issues in this proceeding.

Uncollectibles is one of the components of the authorized revenue requirement, and is determined in each utility's GRC filing. If a utility were to aggressively pursue disconnection of customers for non-payment in order to reduce its uncollectibles account balance, the reasonableness of such action should be addressed in the GRC where the appropriate amount of uncollectible is determined. TURN recognizes that uncollectibles is a GRC item. (Petition, p. 19.) It would be more appropriate to continue to address issues related to uncollectibles accounts in the GRC and not duplicate efforts in this proposed proceeding.

V. CONCLUSION

DRA Supports TURN's Petition that the Commission's policies should ensure consumers are provided with affordable services and avoid service termination. To accomplish such objectives, DRA recommends that (1) energy IOUs aggressively champion energy assistance programs to reduce customers' energy bills and prevent disconnections and the Commission monitor the IOUs progress in such efforts; (2) energy IOUs provide foundational information related to customer payments and disconnection to parties, then parties file additional comments to the Commission regarding how to best

address the issues raise by TURN's petition and identify the scope of the issues to ensure that the Commission's policies are adequate in providing the customers affordable essential services. Finally, DRA recommends that uncollectible issues be removed from consideration in this Petition.

Respectfully submitted,

/s/ RASHID RASHID

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July 23, 2009

ATTACHMENT A

**Residential Collections Report
SDG&E and SoCalGas Proposal
July 13, 2009**

The following describes a report that San Diego Gas & Electric and Southern California Gas Company are willing to produce on a regular basis. The recommended report is the result of discussions with TURN and DRA and their input on how such a report should be developed.

General

The objective of the Residential Collections Report (Report) is to provide some measure or indication of the level of residential customer distress given the current economic crisis.

All information that is reported will be provided for residential service/accounts only.

The information elements of the Report are generally described below under Report Content.

Except as noted below, all information provided by the utilities would be public in nature.

Historical information will be included in the Report to the extent available (see chart).

Data that is either not available or applicable for a particular element shall be noted as "N/A".

Timing

SDG&E and SoCalGas will provide the monthly Report by the 20th day of each month, or the following business day if the 20th falls on a weekend or holiday. For example, the Report for information through July would be provided by August 20.

Annual information will be provided with the monthly Report due February 20.

SDG&E and SoCalGas will issue the first full Report of this information by October 20, 2009 for data through September 2009. Both utilities will attempt to issue a full Report sooner than this date to the extent feasible.

Duration and Future Changes

SDG&E and SoCalGas will provide the Report through calendar year 2012, which is the final year of the parties' proposed cost allocation settlement in A.08-02-001.

SDG&E and SoCalGas commit to meet and confer in good faith with DRA and TURN to discuss any proposed changes to, or discontinuance of the Report.

It is understood that DRA and TURN have the right to request this same information by data request to the extent the Report is not provided for any reason.

Report Content

Information to be provided monthly:

Unless otherwise noted, all information will be provided for CARE, FERA and All Other.

1. Total number of accounts.
2. Total number of accounts in arrears, provided by outstanding period as follows:
 - a. 0-30 days for both SDG&E and SoCalGas
 - b. 31-60 days for both
 - c. 61-90 days for both
 - d. 91-120 days for both
 - e. 121-150 days for SDG&E; and 121-147 days for SoCalGas
 - f. 151-180 days for SDG&E; and over 148 days for SoCalGas
 - g. Over 181 days for SDG&E
3. Total dollar amount for accounts in arrears, provided by outstanding period as set forth in Item 2, above.

NOTE: The information in Item 3 shall be included in the report on a quarterly basis. For example: It will be included in the report due November 20, for the months of July, August and September; and then in the report due February 20 for the months of October, November and December, and so on.

For the interim months before this information is available quarterly, the utilities shall submit the data to the CPUC as confidential under the provisions of its General Order 66-C and Section 583 of the Public Utilities Code. Interested parties that participate in proceedings before the CPUC may also obtain this confidential information subject to the yearly execution of a non-disclosure agreement with the utility.

4. Total number of accounts paid within 30 days, provided by:
 - a. 100% of bill paid
 - b. 50-99% of bill paid
 - c. <50% of bill paid

5. Total number of accounts with payment plans initiated in the month, provided by:
 - a. Installment arrangements
 - b. Extension arrangements

6. Total number of accounts with payment plans broken in the month, provided by:
 - a. Installment arrangements
 - b. Extension arrangements

7. Total number of accounts sent a 2-day (48-hour) notice of service disconnection.

8. Total number of accounts disconnected for non-payment.

9. Total number of accounts with service restored after disconnection for non-payment.

10. Total number of medical baseline accounts.

11. Total number of medical baseline accounts disconnected for non-payment.

12. Total number of medical baseline accounts with service restored after disconnection for non-payment.

NOTE: Items 10, 11, and 12 will not be broken down by CARE, FERA and All Other.

Information to be provided annually:

Unless otherwise noted, all information will be provided for CARE, FERA and All Other.

1. Total residential dollar amount written off as uncollectible for the prior calendar year.

NOTE: The information in Item 1 will only be provided for residential service and not broken down by CARE, FERA and All Other. The utilities are still investigating the extent to which further detail may be provided in a meaningful way (e.g., defining and reporting this element specifically for accounts disconnected for non-payment).

2. Total number of Unique Accounts with payment plans initiated in the calendar year, provided by:
 - a. Installment arrangements
 - b. Extension arrangements
3. Total number of Unique Accounts with payment plans broken in the calendar year, provided by:
 - a. Installment arrangements
 - b. Extension arrangements
4. Total number of Unique Accounts sent 2-day (48-hour) notice of service disconnection.
5. Total number of Unique Accounts disconnected for non-payment.
6. Total number of Unique Accounts with service restored after disconnection for non-payment.

NOTE: The term Unique Accounts refers to those accounts where the relevant activity occurs in the same calendar year.

Report Format

The format of the report shall be addressed after agreement is reached in principle regarding the content, timing and duration of the report. A first draft of the Report format is attached hereto for DRA and TURN's consideration and feedback.

Non-Disclosure Agreement

To be provided by SDG&E and SoCalGas in exemplary form to TURN and then finalized and attached hereto. This pro form agreement will also be used with other non-CPUC parties.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of” in
**RESPONSE OF THE DIVISION OF RATEPAYER ADVOCATES
TO THE PETITION OF THE UTILITY REFORM NETWORK TO
ADOPT, AMEND, OR REPEAL A REGULATION RELATED TO
ARREARAGE MANAGEMENT AND SHUTOFF PREVENTION FOR
RESIDENTIAL CUSTOMERS OF THE MAJOR JURISDICTIONAL
ELECTRIC AND GAS UTILITIES** in **Petition 09-06-022, A.08-05-022, A.08-05-024, A.08-05-025, A.08-05-026, A.05-12-002, A.07-11-011, A.06-12-009, A.06-12-010** by using the following service:

E-Mail Service: sending the entire document as an attachment to an e-mail message to all known parties of record to this proceeding who provided electronic mail addresses.

U.S. Mail Service: mailing by first-class mail with postage prepaid to all known parties of record who did not provide electronic mail addresses.

Executed on July 29, 2009 at San Francisco, California.

/s/ ALBERT HILL

ALBERT HILL

N O T I C E

Parties should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address and/or e-mail address to insure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.

SERVICE LIST

**Petition 09-06-022, A.08-05-022, A.08-05-024, A.08-05-025, A.08-05-026,
A.05-12-002, A.07-11-011, A.06-12-009, A.06-12-010**

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