

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Order Instituting Rulemaking to Address
Energy Utility Customer Bill Debt
Accumulated During the COVID-19
Pandemic.

Rulemaking 21-02-014

**COMMENTS OF THE PUBLIC ADVOCATES OFFICE
ON THE ADMINISTRATIVE LAW JUDGE'S RULING
INVITING RESPONSES TO POST- WORKSHOP QUESTIONS
AND EXTENDING FILING DATES OF BRIEFS**

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I. INTRODUCTION AND SUMMARY

In response to Administrative Law Judge (ALJ) Watts-Zagha's April 2, 2021, Ruling Inviting Responses to Post-Workshop Questions and Extending Filing Dates of Briefs (Ruling) in Rulemaking (R.) 21-02-014, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) provides these Comments. Cal Advocates' Comments address only a limited number of questions contained in the ALJ Ruling.

Cal Advocates' recommendations are summarized below:

- Cal Advocates supports arrearage forgiveness for all residential customers with significant arrears; utility recovery of the forgiven amounts should occur over multiple years.
- Cal Advocates supports the promotion of new COVID-19 arrearage assistance programs on disconnection notices and through Community Based Organizations (CBOs).
- Small business customers should be offered payment plans that can extend up to 24 months.

II. RESPONSES TO SPECIFIC QUESTIONS POSED IN THE ALJ's RULING

A. Follow-up Questions to March 26, 2021 Workshop Presentations Regarding Modifications to Payment Plan Policies

Question 7a: What should occur when a customer misses one or more payments required by a payment plan?

When a customer is unable to keep the terms of their payment plan, the utility should remind the customer of the late payment and inform the customer of available assistance programs, first by using their contact preference (email, text message, or phone call), and as a further measure, contact the customer using all channels if the customer does not respond to their preferred channel. Providing customers with assistance program information allows customers who are behind on their payments additional options for staying current with their bill.

**B. Follow-up Questions to March 26, 2021 Workshop
Presentations on Goals and Mechanics of Potential Arrearage
Forgiveness**

Question 9: How might any new COVID arrearage relief be targeted to customers most at risk of being disconnected?

Cal Advocates supports continuing the utilities' practice of coordinating with CBOs to target and educate residential customers on available assistance plans. CBOs serve clients that do not receive information through typical channels (i.e., hard to reach customers) and vulnerable customers that may have financial difficulty staying connected to utility service. Most energy utilities are already planning to leverage CBOs to inform customers of the ending of the COVID-19 Emergency Customer Protections¹ as part of their COVID-19 Emergency Customer Protection Transition Plans. An efficient way to provide customers with solutions on how to stay connected is to target eligible customers with new arrearage relief program information at the same time as they learn they are at risk of disconnection.

The utilities should include straightforward information regarding new arrearage relief programs on disconnection notices. This method of outreach ensures assistance program information is directly targeted to customers most at risk of being disconnected, and most in need of assistance to retain utility service. Promotion of assistance plans on disconnection notices also provides an incentive for customers to contact the utility for enrollment and provides the opportunity for the customer to learn about additional programs they might be eligible for.

Question 10a: Please comment on how arrearage forgiveness might be structured in the most fair way?

Cal Advocates supports arrearage forgiveness for all residential customers with significant arrears accrued during the disconnection moratorium with recovery over multiple years as a fair structure. Currently there are several arrearage forgiveness programs available for low-income customers; however, each program has its own specific requirements to enroll, so not all low-income customers are eligible for each program. There may be many customers who are slightly outside the qualification requirements for such programs who also need support to stay connected to essential utility services. In addition, customers who have become newly qualified for low-income programs as a result of the pandemic are likely unaware of such

¹ Pursuant to Resolution M-4849.

programs and may not have experience navigating enrollment. Applying arrearage forgiveness for all residential arrearages accrued during the disconnection moratorium is a fair way to keep residential customers that are at risk of disconnection connected to essential utility services. As further explained in response to Question 10d, below, and as illustrated in Attachment A of these comments, recovery over multiple years would be fairer to non-participants as it will limit the annual bill increases customers would experience compared to recovery over a shorter time frame.

Question 10b: Please comment on how arrearage forgiveness might be structured in the most equitable way?

Cal Advocates supports making customers with significant arrears accrued during the disconnection moratorium eligible for arrearage forgiveness as the most equitable approach. This structure ensures that customers at risk for disconnection once the moratorium lifts, will receive sufficient relief to stay connected to utility services.

Question 10d: Assume a theoretical customer with utility debt exceeding \$1,000 is unlikely to pay the debt even subsequent to service disconnection. How would forgiving 90% of this customer's outstanding arrearage impact ratepayers differently than disconnecting this customer for nonpayment? How would paying 90% of this customer's outstanding arrearage impact this customer differently than disconnecting this customer for nonpayment?

Customers want to pay their bills in order to stay connected to utility service. However, many Californians who have been financially impacted by the pandemic, have accrued large sums of debt, and may need additional time to regain their financial footing given that the state is still in the midst of the pandemic. The lifting of the disconnection moratorium without relief would mean that these struggling customers will likely not be able to pay off their debt and will be disconnected from essential utility services, and their past due bills would be recovered from all existing ratepayers. In addition, the costs associated with disconnecting customers, including sending out disconnection notices, increased utility staffing to handle customer service requests, and physically turning off gas meters at customer's residences, would create additional expenses ultimately paid by ratepayers.

In contrast to other assistance program options with strict eligibility criteria, significant arrearages accrued during the disconnection moratorium could be forgiven with minimal need for promoting the program or educating customers on complicated requirements. Commission

adoption of residential arrearage forgiveness would largely avoid the costs associated with disconnecting customers or administering alternative assistance programs, and instead focus ratepayer funds on keeping customers connected to utility service.

Recovery of costs associated with disconnections are typically recovered over a short time frame, such as one year. The large number of customers that would be eligible for disconnection once the disconnection moratorium lifts may result in large rate increases for customers still connected to utility services. In order to simulate the rate impacts that may occur, Cal Advocates estimated the rate increases for two bookend scenarios.

For the first scenario, Cal Advocates compared the estimated electric rate impacts from forgiving all residential arrearages accumulated through the end of the disconnections moratorium² and assumed recovery of the cost over three, four and five years in Tables 1 and 2 below.³ This scenario simulates potential rate impacts if the Commission adopted 100% arrearage forgiveness for arrearages accrued during the pandemic, and thus does not exclude customer arrears from forgiveness based on size of arrears nor customer income status.

For the second scenario, Cal Advocates estimated the electric rate impacts if residential customers with more than \$1,000 in arrears cannot pay back their arrears⁴ when the disconnection moratorium lifts, and are instead disconnected and assumed these costs would be recovered over one year. This scenario only assumes that arrears from all customers accumulated through the end of the disconnections moratorium that individually are more than \$1,000 contributes to the estimated rate increase. This scenario does not include the impact of customers with less than \$1,000 in arrears being disconnected and the associated required cost recovery.

² Arrearages were forecasted by starting with the January 2021 arrearage data, provided in the February 2021 monthly disconnection reports filed by the utilities in R.18-07-005. The January 2021 arrearage data was then escalated by the average monthly percentage increase in arrearages (From September 2020 - January 2021) until the end of June 2021.

³ See Attachment A for more details on the assumptions used and the analysis process.

⁴ Cal Advocates assumed that customers with \$1,000 or more in arrears might be unable to pay back their arrears at the end of the disconnection moratorium. This assumption is based on work performed by the consulting firm Blastpoint which analyzed customer billing data from the Pennsylvania electric utility Duquesne Light, and found customers with over \$1,000 in arrearages were at a higher risk for not being able to pay back any of their arrearages after Pennsylvania's disconnection moratorium lifted.

Cal Advocates estimates that forgiving all residential arrearages (with no exclusions) and recovering the cost over four years will reduce the annual rate increases by half compared to recovering the cost of arrears for all customers with more than \$1,000 in arrears, are unable to pay, and are disconnected over one year. In addition to mitigating the cost increases customers would see on their bill, forgiving all residential arrearages ensures customers are able to stay connected to utility service immediately following the end of the disconnection moratorium. If the Commission adopts arrearage forgiveness for all residential customers with significant arrears, Cal Advocates supports recovery over four or more years in order to mitigate the rate impact to existing customers, some of whom are likely in a worse financial position than before the pandemic.

Table 1: Estimated Electric Rate Increases from Residential Arrearage Forgiveness Recovered Over 3, 4, or 5 Years

Bundled Residential Electric Rate Impact (Cents Per kWh Compared to Current Residential Average Rate)					
	Current Residential Average Rate (RAR) (Cents per kWh)	Residential Customers Unable to Pay (Residential Arrearage >\$1,000), and Recovered Over 1 Year	All Residential Arrearages Forgiven, and Recovered Over 3 Years	All Residential Arrearages Forgiven, and Recovered Over 4 Years	All Residential Arrearages Forgiven, and Recovered Over 5 Years
PG&E	25.2	0.8	0.3	0.2	0.2
SCE	22.0	0.4	0.2	0.2	0.1
SDG&E	32.9	0.5	0.3	0.2	0.2

Table 2: Estimated Electric Rate Percentage Increases from Residential Arrearage Forgiveness Recovered Over 3, 4, or 5 Years

Bundled Residential Electric Rate Impact (% Compared to Current Residential Average Rate)					
	Current Residential Average Rate (RAR) (Cents per kWh)	Residential Customers Unable to Pay (Residential Arrearage >\$1,000), and Recovered Over 1 Year	All Residential Arrearages Forgiven, and Recovered Over 3 Years	All Residential Arrearages Forgiven, and Recovered Over 4 Years	All Residential Arrearages Forgiven, and Recovered Over 5 Years
PG&E	25.2	3.1%	1.2%	0.9%	0.7%
SCE	22.0	1.8%	1.1%	0.8%	0.7%
SDG&E	32.9	1.4%	0.9%	0.7%	0.5%

Question 11a: Would a standardized, flat amount of forgiveness or a customized amount of forgiveness be more likely to keep a customer connected as a utility customer?

If the Commission does not forgive all arrears generated during the COVID-19 pandemic for all residential customers with over \$1,000 in arrears, the Commission should order utilities to forgive a single percentage of a customer’s arrears. In Opening Comments, Cal Advocates expressed support for the Commission’s proposed Straw Proposal A (SP-A), which forgives up to 50% of the arrearage balance for low-income and medical baseline residential customers, on the condition that the customer make monthly on-time payments for the duration of the SP-A program.⁵ Providing the same percentage of arrearage forgiveness to all customers would offer larger forgiveness to customers who have accrued more arrears, and are potentially more at risk of being disconnected.

The limitation of a flat percentage approach is that for some customers with substantial arrearages, the remaining balance may remain an insurmountable debt that the customer is unable to pay. In addition to a flat percentage approach, the Commission should consider modifying SP-A to extend the payment plan length from 12 months to up to 24 months if a customer expresses financial concern with affording the monthly payment under a 12-month

⁵ Cal Advocates Arrearage OIR Opening Comments, pp. 5-6.

payment plan length. This modification ensures the monthly payment is reduced down to a level that the customer could afford to pay.

C. Small Business

Question 12a: Team 5 at the workshop came to consensus on the following for small business payment plans, does your party join this consensus?

Utilities should offer all small business customers with arrears payment plans of no more than 24 months.

Cal Advocates supports payment plans that extend up to 24 months to help small commercial customers stay connected to utility service. Cal Advocates notes in Opening Comments of the Arrearage OIR that Small Commercial customers ineligible for the Commission's proposed Straw Proposal A (SP-A) from the Arrearage Rulemaking should be automatically enrolled in Straw Proposal B (SP-B) with the option to opt-out.⁶

While providing extended payment plans would give small commercial customers more time to spread out payments of their existing arrearages, there is no reliable method of informing all eligible customers of SP-B. In contrast, automatically enrolling eligible customers into SP-B would remove the need for initial promotion material and utilities would simply need to inform eligible customers that they have been enrolled and of the program requirements. In addition, automatic enrollment would reduce the risk of eligible customers being disconnected before they have the chance to enroll.

Question 13b: For all parties: please provide any comments on how utilities should conduct Marketing, Education, and Outreach activities to target small business customers with arrears, including any comments on how to specifically target small business customers that serve or are located in ESJ communities?

Cal Advocates appreciates the Commission's focus on ensuring eligible small business customers are informed and educated about available programs that can help keep them connected to utility service. Utilities are already in a unique position to directly promote assistance programs to eligible small business customers given that utilities know which small businesses have fallen behind on their bills, have the contact information for small business

⁶ Cal Advocates Arrearage OIR Opening Comments, pp. 6-7.

customers, and know where small businesses are located. With this information, utilities can direct eligible small business customers to assistance programs such as payment plans, non-residential discounted rates like the Economic Development Rate, or any other programs developed in this rulemaking.

However, utilities may not have the necessary staff to personally educate all small business customers on the details of each assistance program given the short time period before customers become eligible for disconnection. Because time is of the essence, Cal Advocates supports utilities reaching out to local small business organizations, so that these organizations can promote and educate their small business clientele on available utility assistance programs. Examples of nationwide small business organizations with local chapters include the U.S. Chambers of Commerce,⁷ Small Business Administration,⁸ and the SCORE Association.⁹ Utilities can provide local small business organizations with assistance program promotion material, educational webinars, and enough information so that these organizations can assist their clientele with applying for available programs. Even if utilities prefer to personally discuss the details of assistance programs with small business customers, small business organizations can, at a minimum, provide enough high-level information so that the conversation between the utility and customer can be focused on aligning the customer's needs with the appropriate program.

III. CONCLUSION

Cal Advocates appreciates the opportunity to respond to the questions posed in the ALJ's Ruling and respectfully request that the Commission adopt the recommendations presented here. These recommendations are necessary to keep customers connected to essential utility services.

⁷ <https://www.uschamber.com/co/chambers>.

⁸ <https://www.sba.gov/local-assistance/find>.

⁹ <https://www.score.org/find-location>.

Respectfully submitted,

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ATTACHMENT A

Cal Advocates Comparison of Pacific Gas & Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company's Estimated Residential Electric Rate Impact from 100% Residential Arrearage Forgiveness Recovered Over 3, 4, or 5 Years Compared to the Estimated Residential Electric Rate Increases from Customers Unable to Pay Their Arrearages

For Both of Cal Advocates Arrearage Recovery Scenarios:

- Arrearages were forecasted by assuming the average monthly percentage increase in arrearages (From September 2020 - January 2021) will continue until the end of June 2021.
- Historical January 2021 residential arrearages were escalated by the average monthly percentage increase in arrearages to forecast June 2021 arrearages.
- For dual commodity utilities (PG&E and SDG&E), total arrearages were reduced by ~30% to remove the estimated arrearages from natural gas service and isolate arrearages from electric service.
- Residential rate increases for both scenarios were calculated using the system level sales from all classes including both bundled and unbundled customers.

Scenario "Residential Customers Unable to Pay (Residential Arrearage >\$1,000)" assumes:

- It should be assumed that Residential want to pay their arrearages; however, residential customers with Arrearages over \$1,000 could be unable to pay back their arrearages due to income and/or job loss, and their arrearages will have a higher chance of being recovered from all customer over a single year.
- The consulting firm Blastpoint analyzed customer billing data from the Pennsylvania electric utility Duquesne Light, and found customers with over \$1,000 in arrearages were at a higher risk for not being able to pay back any of their arrearages after Pennsylvania's disconnection moratorium lifted.
- Alison Alvarez, CEO of Blastpoint, "BlastPoint's analysis of late customer payments throughout the pandemic shows that the more money a customer owes (or the more months that go by where no payment is made), the harder it will be for that customer to recover financially. On the other hand, if they can continue to make some payments to keep their overdue balances under about \$300, they're more likely to survive pandemic-related financial setbacks. However, once a customer's balance tops \$1K, our data indicates they will be

less likely to pay anything at all.”

<https://blastpoint.com/blog/blastpoint-statement-on-the-end-of-the-pennsylvania-shut-off-moratorium/>

Scenario "All Residential Arrearages Forgiven, and Recovered Over 3 Years" assumes:

- Forecasted residential arrearages accumulated until the end of the disconnection moratorium (6/30/2021) will be forgiven, and recovered as an equal cents charge to all customer classes over a given number of years (3, 4, or 5 years)

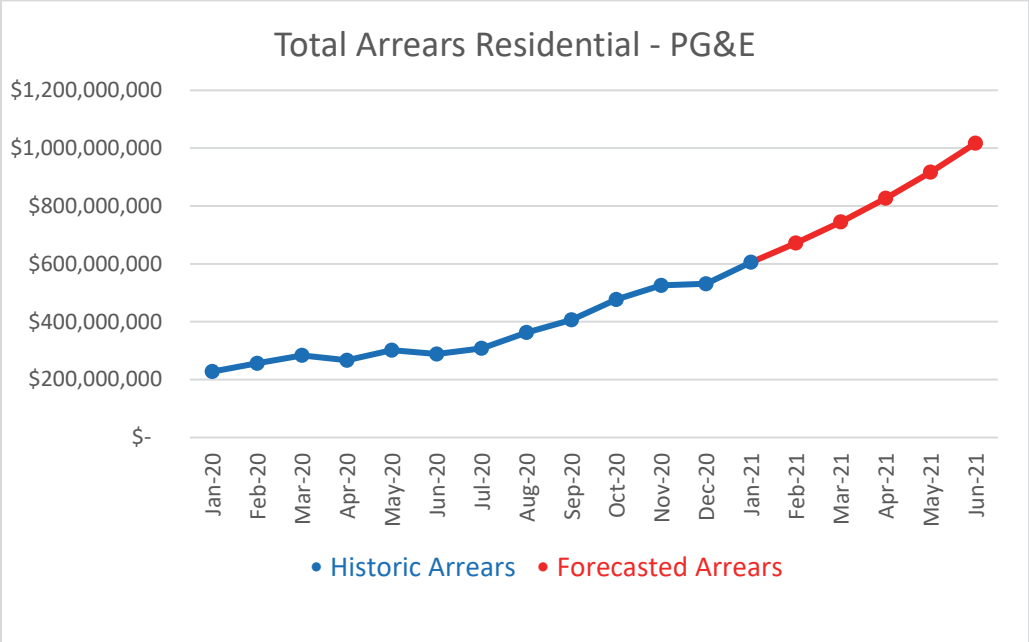
PG&E				
Bundled Electric Residential Average Rate Scenarios from Recovering Forecasted Residential Arrearages During the Disconnection Moratorium				
Current Residential Average Rate (RAR) (Cents per kWh)	Residential Customers Unable to Pay (Residential Arrearage >\$1,000), and Recovered Over 1 Year (Cents per kWh)	All Residential Arrearages Forgiven, and Recovered Over 3 Years (Cents per kWh)	All Residential Arrearages Forgiven, and Recovered Over 4 Years (Cents per kWh)	All Residential Arrearages Forgiven, and Recovered Over 5 Years (Cents per kWh)
25.173	0.78372	0.30313	0.22735	0.18188
% Increase from Current RAR	3.1%	1.2%	0.9%	0.7%
SCE				
Bundled Electric Residential Average Rate Scenarios from Recovering Forecasted Residential Arrearages During the Disconnection Moratorium				
Current Residential Average Rate (RAR) (Cents per kWh)	Residential Customers Unable to Pay (Residential Arrearage >\$1,000), and Recovered Over 1 Year (Cents per kWh)	All Residential Arrearages Forgiven, and Recovered Over 3 Years (Cents per kWh)	All Residential Arrearages Forgiven, and Recovered Over 4 Years (Cents per kWh)	All Residential Arrearages Forgiven, and Recovered Over 5 Years (Cents per kWh)
22.000	0.39398	0.24032	0.18024	0.14419
% Increase from Current RAR	1.8%	1.1%	0.8%	0.7%
SDG&E				
Bundled Electric Residential Average Rate Scenarios from Recovering Forecasted Residential Arrearages During the Disconnection Moratorium				
Current Residential Average Rate (RAR) (Cents per kWh)	Residential Customers Unable to Pay (Residential Arrearage >\$1,000), and Recovered Over 1 Year (Cents per kWh)	All Residential Arrearages Forgiven, and Recovered Over 3 Years (Cents per kWh)	All Residential Arrearages Forgiven, and Recovered Over 4 Years (Cents per kWh)	All Residential Arrearages Forgiven, and Recovered Over 5 Years (Cents per kWh)
32.880	0.46609	0.29612	0.22209	0.17767
% Increase from Current RAR	1.4%	0.9%	0.7%	0.5%

PG&E Residential Electric Arrearage Forgiveness Rate Impact Calculation

		PG&E Electric Sales				
		System	76,601,771,373			
		Electric Percent of Energy Bill	68%			
PG&E						
Bundled Electric Residential Average Rate Scenarios from Recovering Forecasted Residential Arrearages During the Disconnection Moratorium						
		Residential Customers Unable to Pay (Residential Arrearage >\$1,000)		All Residential Arrearages Forgiven, and Recovered Over X Years		
Recovered From:		Current RAR	RAR Increase from Customers Unable to Pay their Arrears Recovered Over 1 Year	3	4	5
All Customers		25.173	0.7837	0.3031	0.2273	0.1819
% Increase from Current RAR			3.1%	1.2%	0.9%	0.7%
PG&E Arrearages from Customers Unable to Pay						
	Non CARE	CARE/FERA	Residential			
1000 Arrearage Sum Total	\$199,712,731	\$157,722,135	\$357,434,866			
Sum of Arrearages With Gas Arrears Removed	\$136,768,439	\$108,012,194	\$244,780,633	Disconnection Start Date 7/1/2021		
Adjustment for Growth	168%	168%	168%			
Net Arrears Recovered through Rates	\$335,436,806	\$264,909,546	\$600,346,352			
	Years for Rate Recover	Growth Rate				
	1	11%				

PG&E Residential Arrearage Forgiveness			
	Non CARE	CARE/FERA	Residential
Total Arrearages	\$326,106,218	\$279,525,121	\$605,631,339
Sum of Arrearages With Gas Arrears Removed	\$223,325,965	\$191,426,026	\$414,751,991
Adjustment for Growth	168%	168%	168%
Net Arrears Recovered through Rates	\$375,097,510	\$321,518,484	\$696,615,994
		Growth Rate	
		11%	

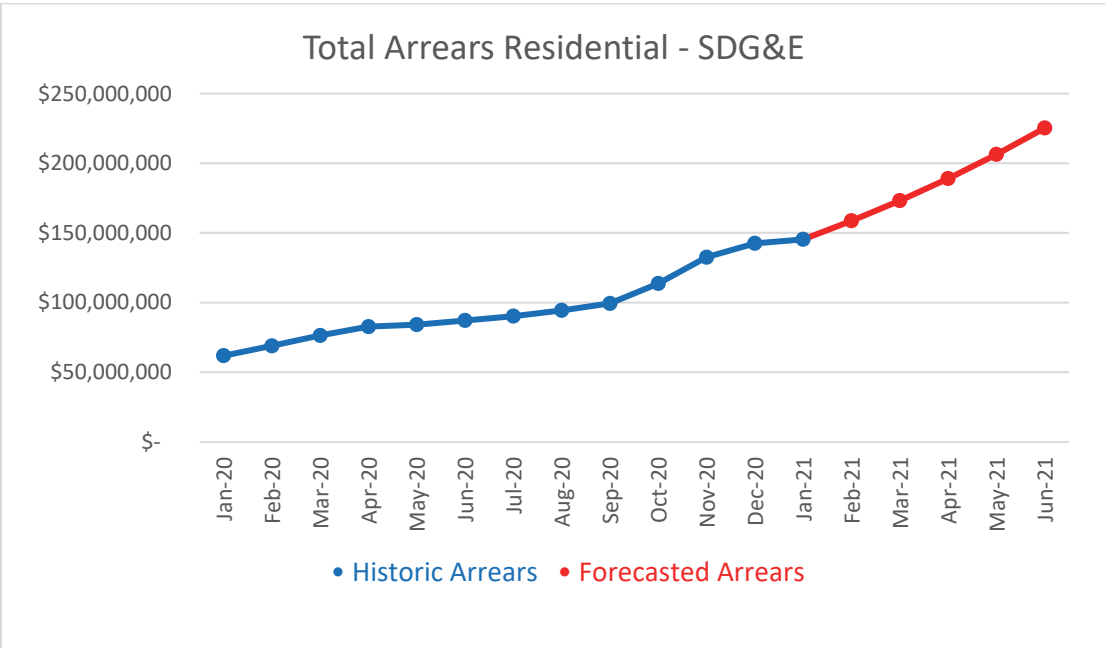
Date	Total Arrears Residential	% Increase - Total Arrears
Jan-20	\$ 228,066,772	
Feb-20	\$ 256,428,462	12%
Mar-20	\$ 283,666,504	11%
Apr-20	\$ 266,842,980	-6%
May-20	\$ 301,593,305	13%
Jun-20	\$ 288,435,492	-4%
Jul-20	\$ 308,084,726	7%
Aug-20	\$ 362,864,480	18%
Sep-20	\$ 406,477,994	12%
Oct-20	\$ 477,013,906	17%
Nov-20	\$ 525,693,980	10%
Dec-20	\$ 531,072,988	1%
Jan-21	\$ 605,631,339	14%
Feb-21	\$ 671,814,437	
Mar-21	\$ 745,229,992	
Apr-21	\$ 826,668,363	
May-21	\$ 917,006,279	
Jun-21	\$ 1,017,216,279	
Sum of Arrears Over 5 years	\$ 203,443,255.84	
Average Monthly % Increase in Arrears from		
10.9280%		



SDG&E Residential Electric Arrearage Forgiveness Rate Impact Calculation						
		SDG&E Electric Sales (kWh)				
		System	18,349,000,000			
		Electric Percent of Energy Bill	72%			
SDG&E Bundled Electric Residential Average Rate Scenarios from Recovering Forecasted Residential Arrearages During the Disconnection Moratorium						
			Residential Customers Unable to Pay (Residential Arrearage >\$1,000)	All Residential Arrearages Forgiven, and Recovered Over X Years		
Recovered From:		Current RAR	Unable to Pay their	3	4	5
All Customers		32.880	0.4661	0.2961	0.2221	0.1777
% Increase from Current RAR			1.4%	0.9%	0.7%	0.5%
SDG&E Arrearages from Customers Unable to Pay						
	Non CARE	CARE/FERA	Residential			
	\$42,855,809	\$33,386,983	\$76,242,792			
Sum of Arrearages With Gas Arrears Removed	\$31,009,992	\$24,158,454	\$55,168,446	Disconnection Start Date 7/1/2021		
Adjustment for Growth	155%	155%	155%			
Net Arrears Recovered through Rates	\$48,072,020	\$37,450,693	\$85,522,713			
	Years	Growth Rate				
	1	9%				

SDG&E Residential Arrearage Forgiveness			
	Non CARE	CARE/FERA	Residential
Arrearage Sum Total	\$80,745,655	\$64,574,332	\$145,319,987
Sum of Arrearages With Gas Arrears Removed	\$58,426,668	\$46,725,276	\$105,151,944
Adjustment for Growth	155%	155%	155%
Net Arrears Recovered through Rates	\$90,573,643	\$72,434,021	\$163,007,664
		Growth Rate	
		9%	

Date	Total Arrears Residential	% Increase - Total Arrears
Jan-20	\$ 61,828,681	
Feb-20	\$ 68,925,219	11%
Mar-20	\$ 76,366,175	11%
Apr-20	\$ 82,667,466	8%
May-20	\$ 84,098,780	2%
Jun-20	\$ 87,138,811	4%
Jul-20	\$ 90,197,509	4%
Aug-20	\$ 94,342,511	5%
Sep-20	\$ 99,315,242	5%
Oct-20	\$ 113,660,174	14%
Nov-20	\$ 132,539,642	17%
Dec-20	\$ 142,479,530	7%
Jan-21	\$ 145,319,987	2%
Feb-21	\$ 158,636,636	
Mar-21	\$ 173,173,580	
Apr-21	\$ 189,042,643	
May-21	\$ 206,365,894	
Jun-21	\$ 225,276,592	
Sum of Arrears Over 5 years	\$ 22,527,659.17	
Average Monthly % Increase in Arrears from		
9%		



SCE Residential Electric Arrearage Forgiveness Rate Impact Calculation					
		SCE Electric Sales (kWh)			
		Bundled/CCA DA	2021		
		System	77,063,666,695		
SCE Bundled Electric Residential Average Rate Scenarios from Recovering Forecasted Residential Arrearages During the Disconnection Moratorium					
		Residential Customers Unable to Pay (Residential Arrearage >\$1,000)	All Residential Arrearages Forgiven, and Recovered Over X Years		
Recovered From:	Current RAR	Unable to Pay their A	3	4	5
All Customers	22.000	0.3940	0.2403	0.1802	0.1442
% Increase from Current RAR		1.8%	1.1%	0.8%	0.7%
SCE Arrearages from Customers Unable to Pay					
	Non CARE	CARE	Residential		
Arrearage Sum Total	\$113,427,955	\$71,315,389	\$184,743,344		
	\$113,427,955	\$71,315,389	\$184,743,344	Disconnection Start Date	
Adjustment for Growth	164%	164%	164%	7/1/2021	
Net Arrears Recovered through Rates	\$186,414,892	\$117,204,357	\$303,619,249		
	Years	Growth Rate			
	1	10%			

SCE Residential Arrearage Forgiveness			
	Non CARE	CARE	Residential
Arrearage Sum Total	\$186,086,887	\$151,976,401	\$338,063,289
	\$186,086,887	\$151,976,401	\$338,063,289
Adjustment for Growth	164%	164%	164%
Net Arrears Recovered through Rates	\$305,827,316	\$249,767,921	\$555,595,237
		Growth Rate	
		10%	

Date	Total Arrears Residential - excluding 20-30 day arrears	% Increase - Total Arrears
Jan-20	\$ 89,630,131	
Feb-20	\$ 86,414,504	-9%
Mar-20	\$ 95,390,755	9%
Apr-20	\$ 106,308,674	-1%
May-20	\$ 104,600,151	8%
Jun-20	\$ 128,895,507	22%
Jul-20	\$ 141,024,971	6%
Aug-20	\$ 176,676,017	32%
Sep-20	\$ 225,063,210	26%
Oct-20	\$ 279,743,936	18%
Nov-20	\$ 323,177,942	6%
Dec-20	\$ 331,534,755	4%
Jan-21	\$ 338,063,289	-1%
Feb-21	\$ 373,379,193	
Mar-21	\$ 412,384,385	
Apr-21	\$ 455,464,270	
May-21	\$ 503,044,510	
Jun-21	\$ 555,595,237	
Sum of Arrears Over 5 years		
Average Monthly % Increase in Arrears		
10%		

