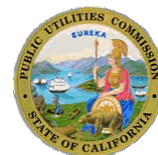


**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



**FILED**

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Order Instituting Rulemaking to Consider New Approaches to Disconnections and Reconnections to Improve Energy Access and Contain Costs.

Rulemaking 18-07-005  
(Filed July 12, 2018)

**REPLY COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M)  
TO THE PROPOSED DECISION AUTHORIZING  
PERCENTAGE OF INCOME PAYMENT PLAN PILOT PROGRAMS**

Rebecca Hansson

*Attorney for:*

SAN DIEGO GAS & ELECTRIC COMPANY  
8330 Century Park Court, CP32D  
San Diego, CA 92123  
Telephone: (858) 654-8278  
Email: RHansson@sdge.com

September 27, 2021

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**I. INTRODUCTION**

Pursuant to Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), San Diego Gas & Electric Company (SDG&E) respectfully provides these Reply Comments to the Proposed Decision Authorizing Percentage of Income Payment Plan Pilot Programs (PD). As an initial matter, SDG&E appreciates the comments of all the parties to this proceeding and specifically supports Southern California Edison’s (SCE) suggestion of an extended evaluation period for the percentage of income payment plan pilot (PIPP Pilot or Pilot) and SCE and Pacific Gas and Electric Company’s (PG&E) arguments related to the treatment of franchise fees, taxes, and surcharges. Below, SDG&E replies to certain comments of PG&E, SCE, and the Utility Consumers’ Action Network (UCAN), as well as the Center for Accessible Technology and the National Consumer Law Center (together, the Joint Parties).

**II. DISCUSSION**

**A. PG&E’s Comments on the PD’s Misstatement of Fact Underscores SDG&E Concern Regarding a 4% Bill Cap**

In Comments, PG&E called upon a factual error in the PD and clarified that rather than a 4% bill cap, it had proposed an 8% bill cap.<sup>1</sup> SDG&E has expressed concerns regarding lack of evidence on the record concerning a 4% bill cap,<sup>2</sup> which was further underscored by the PD's misinterpretation of information presented by PG&E to establish a 4% bill cap for Pilot participants.<sup>3</sup> Accordingly, the Commission should establish a minimum 6% bill cap for the Pilot, as supported by SDG&E in this proceeding, given the lack of evidence on the record in support of a 4% bill cap.

**B. SCE's Comments Regarding Cost-Sharing Require Establishment of Cost-Sharing Percentages**

SDG&E supports SCE's request for modification of the PD to state that all IOUs—not just PG&E—may include Evaluator and Working group Facilitator costs in their respective memorandum accounts.<sup>4</sup> However, the Commission should establish cost-sharing percentages as well. SDG&E recommends a cost-sharing percentage relative to each IOUs respective share of the 15,000 statewide customer-enrollment target equal to 33% for PG&E and SCE (5,000/15,000), 27% for SoCalGas (4,000/15,000), and 7% for SDG&E (1,000/15,000).

**C. UCAN's Request to Shorten the Pilot Period Misunderstands the Purpose of the Pilot**

In comments, UCAN states that “[t]he PD's decision to establish a 48-month evaluation period ignores the very real crisis that utility arrearage payments already represent to millions of

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<sup>1</sup> PG&E's (U 39 M) Opening Comments on the Proposed Decision Authorizing Percentage Of Income Payment Plan Pilot Programs (September 22, 2021) at 8.

<sup>2</sup> See Comments of SDG&E (U 902 M) to the Proposed Decision Authorizing Percentage of Income Payment Plan Pilot Programs (September 22, 2021) (SDG&E's Comments to the PD) at 2-3.

<sup>3</sup> PD at 39.

<sup>4</sup> Comments of SCE (U 388-E) on Proposed Decision Authorizing Percentage of Income Payment Plan Pilot Programs (September 22, 2021) at 7.

vulnerable California low-income customers.”<sup>5</sup> This argument demonstrates a misunderstanding of the purpose of this proceeding. The overarching purpose of the Disconnections Order Instituting Rulemaking (OIR) is to adopt “rules and policies to reduce disconnections and improve reconnection processes and outcomes for disconnected customers.”<sup>6</sup> Further, the PD authorizes the PIPP Pilot to test “whether a PIPP program can (i) reduce the number of low-income households at risk of disconnection, (ii) encourage participation of energy saving and energy management programs, (iii) increase access to essential levels of energy service, and (iv) control program costs.”<sup>7</sup> None of these stated goals relates specifically to reducing arrearages related to COVID.

Indeed, SDG&E is sympathetic to customers experiencing financial hardship as a result of the COVID pandemic; however, SDG&E submits that COVID-related financial hardships are already being thoroughly considered in the Order Instituting Rulemaking to Address Energy Utility Customer Bill Debt Accumulated During the COVID-19 Pandemic (COVID OIR).<sup>8</sup> In particular, the Commission noted the importance of maximizing the significant state and federal funded relief programs as “the best approach to assisting customers in need,” and further established automatic 24-month payment plans to “bridge the gap between the end of the disconnection moratorium and the availability of significant arrearage relief on the horizon.”<sup>9</sup> Since the Commission continues to assess and address financial effects of the COVID pandemic in the COVID OIR, SDG&E contends that the PIPP Pilot is intended to test the different and

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<sup>5</sup> Comments of UCAN on the Proposed Decision of Administrative Law Judge Wong on the Percentage of Income Payment Plan Pilot Projects for the Four Major California Energy Utilities (September 22, 2021) at 7.

<sup>6</sup> PD at 8.

<sup>7</sup> *Id.* at 12.

<sup>8</sup> *See generally* R.21-02-014.

<sup>9</sup> *See generally* D.21-06-036 at FOF 6-8.

separate concern around disconnections for the purpose of informing a potential long-term PIPP program. Accordingly, the Commission’s overarching goals in this PIPP phase of the proceeding are best served by commencing a well thought out Pilot that obtains sufficient and reliable data over at least the time period allotted in the PD.

**D. The Joint Parties’ Argument For an Individualized, Fixed Monthly Bill Must Be Rejected**

In their Comments, the Joint Parties “continue to endorse [their] proposal set out in comments on the 2021 Straw Proposal Ruling, which recommended that the PIPP Pilots should be structured so that pilot participants will be charged a set monthly amount . . .” that does not use a “reference income.”<sup>10</sup> Commission Rule of Practice and Procedure 14.3(c) states that comments that fail to focus on factual, legal, or technical errors in the PD will be afforded no weight. Accordingly, because the Joint Parties fail to do more than reargue their policy position, the Commission must reject the Joint Parties’ proposal for an individualized, fixed monthly bill.

**III. CONCLUSION**

SDG&E appreciates the opportunity to provide these Reply Comments.

Respectfully submitted on behalf of SDG&E,

By: /s/ Rebecca Hansson  
Rebecca Hansson

Attorney for  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 Century Park Court, CP32D  
San Diego, California 92123  
Telephone: (858) 654-8278  
E-mail: RHansson@sdge.com

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<sup>10</sup> Comments of Center for Accessible Technology and National Consumer Law Center on the September 2, 2021 Proposed Decision Authorizing Percentage of Income Payment Plan Pilot Programs (September 22, 2021) at 3-4 (emphasis added).