



**Attachment A**

**Phase 1-A Data Questions for SMJUs**

**FILED**

03/04/22

04:59 PM

R1807005

Areas shaded in gray should not be filled.

- 1. Arrearages Data – For purposes of this data request, only report arrearages data for customers with the minimum number of days in arrears after which a customer’s service may be terminated for non-payment as specified in Rule 11 of the utility’s tariffs. Specify here the Rule 11 minimum number of days in arrears after which a customer’s service may be terminated for non-payment:\_\_\_\_\_.**

- a. Provide the historical data in Tables 1 – 6. Please note that Tables 3 – 6 request data for December 31, 2021 only.**

Table 1: Number of Unique Residential Customers in Arrears				
	(A)	(B) = (C) + (D)	(C)	(D)
	Total Residential Customers	Total Residential Customers in Arrears	Total Non-CARE Customers in Arrears	Total CARE Customers in Arrears
December 31, 2018				
December 31, 2019				
December 31, 2020				
December 31, 2021				

Table 2: Dollar Amount of Residential Customers in Arrears			
	(A) = (B) + (C)	(B)	(C)
	Total Dollar Amount of Residential Customer Arrears	Total Dollar Amount of Non-CARE Customers in Arrears	Total Dollar Amount of CARE Customers in Arrears
December 31, 2018			
December 31, 2019			
December 31, 2020			
December 31, 2021			

Table 3: Number of Unique Residential Customers in Arrears – December 31, 2021				
	(A)	(B) = (C) + (D)	(C)	(D)
	Total Residential Customers	Total Residential Customers in Arrears	Total Non-CARE Customers in Arrears	Total CARE Customers in Arrears
31 - 60 Days Late				
61 – 180 Days Late				
181+ Days Late				
Total				

Table 4: Number of Unique Residential Customers in Arrears – December 31, 2021				
	(A)	(B) = (C) + (D)	(C)	(D)
	Total Residential Customers	Total Residential Customers in Arrears	Total Non-CARE Customers in Arrears	Total CARE Customers in Arrears
Less Than \$250				
\$250 - \$499				
\$500+				
Total				

Table 5: Dollar Amount of Residential Customers in Arrears – December 31, 2021			
	(A) = (B) + (C)	(B)	(C)
	Total Dollar Amount of Residential Customer Arrears	Total Dollar Amount of Non-CARE Customers in Arrears	Total Dollar Amount of CARE Customers in Arrears
31 - 60 Days Late			
61 - 180 Days Late			
181+ Days Late			
Total			

	(A) = (B) + (C)	(B)	(C)
	Total Dollar Amount of Residential Customer Arrears	Total Dollar Amount of Non-CARE Customers in Arrears	Total Dollar Amount of CARE Customers in Arrears
Less Than \$250			
\$250 - \$499			
\$500+			
Total			

**b. Provide projected data for Tables 7 – 8 and Tables 10– 13. Include the Estimated Date in the table header.**

Project the data in Tables 3 and 5 for the estimated date that the utility will recommence disconnections for non-payment.<sup>1</sup> If unable to make a projection, assume the customer count and corresponding dollar amount data for December 31, 2021 remains constant until such time that disconnections for non-payment recommence.

	(A)	(B) = (C) + (D)	(C)	(D)
	Total Residential Customers	Total Residential Customers in Arrears	Total Non-CARE Customers in Arrears	Total CARE Customers in Arrears
31 - 60 Days Late				
61 - 180 Days Late				
181+ Days Late				
Total				

<sup>1</sup> Utilities that receive California Arrearage Payment Program (CAPP) funding are required to: Not disconnect customers with arrearages accrued during the COVID-19 pandemic bill relief period while CSD reviews and approves all pending CAPP applications; and not disconnect a CAPP recipient's utility service for 90 days after a CAPP benefit is applied, regardless of the balance owed.

Table 8: Dollar Amount of Residential Customers in Arrears As of Date Disconnections for Non-Payment Recommence Estimated Date: _____			
	(A) = (B) + (C)	(B)	(C)
	Total Dollar Amount of Residential Customer Arrears	Total Dollar Amount of Non-CARE Customers in Arrears	Total Dollar Amount of CARE Customers in Arrears
31 - 60 Days Late			
61 - 180 Days Late			
181+ Days Late			
Total			

California Arrearage Payment Program (CAPP) utility awards are shown in Table 9.<sup>2</sup>

Table 9: California Arrearage Payment Program Utility Awards			
	Arrearages Reported in CAPP Utility Survey	CAPP Award	Estimated Residential Customers Receiving CAPP Benefit
Bear Valley Electric Service (BVES)	\$709,455	\$321,068	817
Liberty Utilities (Liberty)	\$1,748,287	\$790,857	1,930
PacifiCorp	\$3,610,572	\$1,633,140	1,627
Southwest Gas (SWGAs)	\$10,271,607	\$4,645,762	34,276

Using the data in Table 7 and 8 as a starting point, net from this data the effect of applying the CAPP awards in Table 9 to customer balances.

Table 10: Number of Unique Residential Customers in Arrears, Net of Effect of CAPP Funding As of Date Disconnections for Non-Payment Recommence Estimated Date: _____				
	(A)	(B) = (C) + (D)	(C)	(D)
	Total Residential Customers	Total Residential Customers in Arrears	Total Non-CARE Customers in Arrears	Total CARE Customers in Arrears
31 - 60 Days Late				
61 - 180 Days Late				
181+ Days Late				
Total				

<sup>2</sup> <https://www.csd.ca.gov/Shared%20Documents/CAPP-Utility-Allocation-Summary.pdf>

Table 11: Dollar Amount of Residential Customers in Arrears, Net of CAPP Funding As of Date Disconnections for Non-Payment Recommence Estimated Date: _____			
	(A) = (B) + (C)	(B)	(C)
	Total Dollar Amount of Residential Customer Arrears	Total Dollar Amount of Non-CARE Customers in Arrears	Total Dollar Amount of CARE Customers in Arrears
31 - 60 Days Late			
61 - 180 Days Late			
181+ Days Late			
Total			

Using the data in Table 10 and 11 as a starting point, net from this data the number of customers who are enrolled and current in a Small Electric or Gas Utility COVID-19 Residential Relief Payment Plan<sup>3</sup> (COVID Arrearages Payment Plan) or current on any other payment plan and provide corresponding dollar data for these customers. **The customer count and corresponding dollar amount in Tables 12 and 13 should reflect customers who are at risk of disconnection as of the date that disconnections for non-payment recommence.**

Table 12: Number of Unique Residential Customers in Arrears – Net of Effect of CAPP Funding And Netted of Customers Current on COVID Arrearages Payment Plan or Other Payment Plan As of Date Disconnections for Non-Payment Recommence Estimated Date: _____				
	(A)	(B) = (C) + (D)	(C)	(D)
	Total Residential Customers	Total Residential Customers in Arrears	Total Non-CARE Customers in Arrears	Total CARE Customers in Arrears
31 - 60 Days Late				
61 - 180 Days Late				
181+ Days Late				
Total				

<sup>3</sup> See Decision Addressing Energy Utility Customer Bill Debt Via Automatic Enrollment in Long Term Payment Plans (D). 21-06-036, Appendix D.

Table 13: Dollar Amount of Residential Customers in Arrears, Net of CAPP Funding and Net of Amounts for Customers Current on COVID Arrearages Payment Plan or Other Payment Plan As of Date Disconnections for Non-Payment Recommence Estimated Date: _____			
	(A) = (B) + (C)	(B)	(C)
	Total Dollar Amount of Residential Customer Arrears	Total Dollar Amount of Non-CARE Customers in Arrears	Total Dollar Amount of CARE Customers in Arrears
31 - 60 Days Late			
61 - 180 Days Late			
181+ Days Late			
Total			

2. Cost and Rate Impact Estimates, Arrearage Management Plan (AMP)

- a. Using the data in Tables 12 & 13, project costs associated with placing in an Arrearage Management Plan<sup>4</sup> CARE customers reflected in Table 12 and for whom amounts are shown in Table 13 who are over 60 days in arrears as of the date that disconnection for non-payment recommences and who are not already enrolled and current on a payment plan and are at risk of disconnection. Assume all eligible customers will be on an AMP and 100% of AMP debt will be forgiven. Provide an estimate of the cost of forgiven arrearages for twelve months from the estimated date in Table 14 and an estimate for AMP administrative expenses over the same time period.

Table 14: Dollar Amount of 100% AMP Debt Forgiveness Date Disconnections for Non-Payment Recommences Estimated Date: _____	
	Dollar Amount
Forgiven Arrearages Cost (12 months)	
Program Administrative Expenses	

- b. Estimate the Non-CARE and CARE average residential rate impact of the total estimated costs calculated in Table 14 above using current effective rates. Provide an estimated Non-CARE and CARE monthly bill impact using monthly usage data for a typical Non-CARE and CARE customer.

<sup>4</sup> D.20-06-003.

3. Cost and Rate Estimates for Capping Disconnection Rates at 2018 Level

- a. Review Table 15 data for your utility which is based on data submitted by your utility in connection with the Senate Bill (SB) 598 Report issued May 2020.<sup>5</sup>

	Alpine Gas	West Coast Gas	Liberty	Bear Valley	PacifiCorp	Southwest Gas
2015	0.00%	0.79%	0.92%	2.70%	2.94%	N/A*
2016	0.07%	0.94%	1.02%	2.19%	2.49%	N/A*
2017	0.19%	3.15%	0.95%	2.26%	1.72%	4.27%
2018	0.00%	3.46%	0.92%	1.74%	2.31%	3.72%
2019	0.24%	2.60%	0.82%	3.60%	4.15%	3.13%**

\*Southwest Gas is not able to provide data from 2015 and 2016 because the Company's system only retains information for 24 months.

\*\*Preliminary 2019 data.

- b. Using the 2018 disconnections rate in Table 15 as a cap, compare this disconnection rate to the disconnection rate that would result for customers reflected in Table 12 and for whom amounts are shown in Table 13. Assume all such customers will be disconnected.<sup>6</sup> In calculating the dollar amount in column D, assume that any excess disconnection rate corresponds to customers in Table 12<sup>7</sup> and all customers have the same average arrearage amount.<sup>8</sup> Provide this cost for twelve months from the estimated date in Table 16 and an estimate for administrative expense over the same time period.

<sup>5</sup> See <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/office-of-governmental-affairs-division/reports/2020/2020-pu-code-9105-report.pdf> ; The rates shown are graphed in Figure 15 of the referenced report.

<sup>6</sup> To calculate the disconnection rate in Table 12, divide the total amount of column B by the total amount of column A.

<sup>7</sup> Using the total amount in column A of Table 12 in the denominator, solve for the number of disconnected customers in the excess disconnection cap rate in column C of Table 16.

<sup>8</sup> To calculate the average arrearage amount per customer in Table 13, divide the total amount of column A by the total amount of column B of Table 12.

Table 16: Estimated Costs for Capping Disconnection Rate Below 2018 Level – Date Disconnections for Non-Payment Recommendations				
Estimated Date: _____				
	(A)	(B)	(C) = (A) – (B)	(D)
	Disconnection Rate, Calculated From Data in Table 12	Residential Disconnections Rate – SB 598 Report, Table 15	Excess Over 2018 Cap	Dollar Amount from Table 13 Corresponding to the Excess Over 2018 Cap
Capping Disconnection Rate Cost (12 months)				
Administrative Expense				

- c. Estimate the Non-CARE and CARE average residential rate impact of the total estimated costs calculated in Table 16 above using current effective rates. Provide an estimated Non-CARE and CARE monthly bill impact using monthly usage data for a typical Non-CARE and CARE customer.
4. Residential Uncollectibles and Costs of Waiving Deposits and Fees
    - a. Provide the balance of your COVID-19 Pandemic Protections Memorandum Account (CPPMA) as of December 31, 2021.
    - b. Provide the amount in the balance of (a) above that corresponds to residential uncollectibles in excess of GRC-authorized uncollectible amounts.
    - c. Provide an estimate of how much the amount in the balance of (b) above would have been if deposits to offset these amounts had been prohibited.
    - d. If your utility is unable to provide data for (a) – (c), indicate why the CPPMA is not used to track these costs and provide the data for (b) – (c) indicating where these costs are tracked.
    - e. Provide a description of your utility’s accounting treatment of reconnection fee income, including how it was treated in your most recent General Rate Case. Provide an estimate of the revenue impact this could have over a twelve month period if reconnection fees are prohibited.