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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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

Rulemaking 18-07-005

**ADMINISTRATIVE LAW JUDGE’S RULING
DIRECTING UTILITIES TO FILE ARREARAGES
MANAGEMENT PLAN STATUS UPDATES**

This ruling grants the motion of National Consumer Law Center and the Center for Accessible Technology (NCLC and CforAT) for a status update regarding Arrearages Management Plan (AMP) program implementation by Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SoCalGas).

This ruling directs PG&E, SDG&E, and SoCalGas to each file a status update regarding its AMP program by May 2, 2022. Parties may file comments on the status updates by April 25, 2022 and replies by May 11, 2022.

1. Background

On July 12, 2018, the Commission approved the Order Instituting Rulemaking for this proceeding pursuant to Senate Bill (SB) 598 to address disconnection rates across California’s electric and gas investor-owned utilities. The primary goal of this proceeding is to adopt rules and policies that will ultimately reduce disconnections and improve reconnection processes and outcomes for disconnected customers. This proceeding is being conducted in

multiple phases. Phase 1 of this proceeding established near-term and immediate improvements.

In Decision (D.) 20-06-003, the Commission ordered Southern California Edison Company (SCE), PG&E, SDG&E, and SoCalGas to establish AMP programs.

On January 28, 2022, SCE submitted Tier 1 Advice Letter 4704-E to provide an update to its Rule 9, Rendering and Payment of Bills, specifically the AMP tariff provision, to allow for exceptions to the current AMP rules when extenuating circumstances occur that are the result of SCE operations. SCE's Advice Letter 4704-E included examples of extenuating circumstances where SCE proposed to grant exceptions to AMP rules and provide participants the opportunity to re-enroll or receive AMP forgiveness. SCE submitted Supplemental Advice Letter 470-E-A and 4704-E-B on February 9, 2022 and February 25, 2022 respectively to modify this request.

On February 16, 2022, NCLC and CforAT filed a motion requesting that the Commission seek an update from PG&E, SDG&E, and SoCalGas regarding unanticipated barriers to customers remaining in an AMP program. NCLC and CforAT expressed appreciation for SCE's advice letter and requested that the Commission seek information from the other utilities about whether they have seen similar barriers to customers remaining in an AMP program due to anticipated circumstances outside of the control of a customer. NCLC and CforAT also requested that the Commission provide an opportunity for all stakeholders to review the challenges identified by the utilities.

In Phase 2 of this proceeding, we expect to provide additional opportunities to review barriers to customers remaining in AMP programs.

2. Questions for AMP Status Updates

This ruling directs PG&E, SDG&E, and SoCalGas to each file an AMP status update with responses to the questions below. Responses should address each question presented in the order below.

1. Have each of the following examples of unanticipated barriers to customers remaining in an AMP program raised by SCE in Advice Letter 4704-E arisen in your AMP program?
 - a. Delayed billing;
 - b. Incorrectly applied CARE, FERA, or Medical Baseline bill discounts; or
 - c. Post-AMP enrollment in net energy metering.
2. Have other types of unanticipated barriers to customers remaining in an AMP program due to your utility's program operations arisen? If so, please provide examples.
3. SCE proposed to modify several tariffs (SCE's Schedule D-CARE, Schedule D-FERA, Schedule TOU-D, Schedule TOU-D-T, and Rule 9 AMP provision) through its Supplemental Advice Letter 4704-E-B as follows: "When extenuating circumstances occur that are the result of SCE operations, exceptions to these AMP rules are permitted as follows: (1) a Customer removed from AMP may re-enroll in AMP prior to the 12-month waiting period; (2) an AMP Customer who receives and pays on a bill consisting of multiple months' charges will receive 1/12 arrearage forgiveness for each month's charges that are ultimately paid on time; (3) for an AMP Customer who receives a delayed bill and does not entirely pay the bill consisting of multiple months' charges, the unpaid amounts associated with prior months' charges will be due and eligible for a payment arrangement when the Customer exits AMP; (4) any AMP forgiveness that was or will be applied between an AMP Customer's enrollment in an NEM tariff and the Customer's removal from AMP will

remain on the Customer account.” Does your utility intend to seek similar tariff modifications through an advice letter? Please explain why or why not.

4. Has your utility identified other types of barriers to customers remaining in an AMP program that may require a modification of the AMP program through a Commission decision? If so, please describe these barriers and explain which provisions of D.20-06-003 would require modification to address these barriers.

IT IS SO RULED.

Dated March 25, 2022, at San Francisco, California.

/s/ STEPHANIE S. WANG
Stephanie S. Wang
Administrative Law Judge