



**FILED**

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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 PROVIDE DATA AND REQUESTING COMMENTS ON PILOT QUESTIONS**

**Summary**

This ruling directs Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company, and San Diego Gas & Electric Company (together, the Large Energy Utilities) to include supplemental data in their opening comments on the meet and confer report by February 24, 2023. This ruling also requests party comments on additional questions about the proposed pilot by February 24, 2023 and replies by March 13, 2023.

**1. Background**

On July 15, 2022, the assigned Commissioner issued a Phase 2 scoping memo in this proceeding that included questions regarding the Arrearages Management Plan (AMP) program, COVID Long-Term Payment Plans (COVID payment plans), and the Community-Based Organization (CBO) Arrears Case Management Pilot Proposal (CBO Pilot Proposal).

On November 10, 2022, I issued a ruling that directed each of the Large Energy Utilities to file responses to a data questions regarding payment plan data as of September 30, 2022. The November 2022 ruling also directed these utilities to file a joint meet-and-confer report by February 3, 2023 regarding payment plan best practices and lessons learned. The November 2022 ruling requested party comments on the meet-and-confer report by February 24, 2023 and replies by March 13, 2023.

## **2. Direction for Large Energy Utilities**

In the meet and confer report filed on February 3, 2023, the Large Energy Utilities explained that it is difficult to compare the success rates of their AMP and COVID payment plans because their data responses to the November 2022 ruling were based on different definitions of what they considered successful completion of a payment plan, i.e. whether a payment plan that was paid off with assistance from California Arrearage Payment Program (CAPP) funding was considered successfully completed or removed from the program. The report also noted that utilities used different assumptions when reporting average monthly payment amounts.

This ruling directs each of the Large Energy Utilities to include in their opening comments on the meet and confer report the information in the tables below. The purpose of providing this additional data is to provide the Commission and parties with utility data that clearly identifies and separates out the impact of CAPP funding on AMP success.

**Table 1. AMP Data as of December 31, 2022**

Total customers enrolled over time	
Customers who are actively enrolled in AMP	
Customers who were removed from (completed) the AMP program due to full or partial payment of their arrearages by CAPP funding	
Customers who successfully completed AMP without any CAPP funding applied to their arrearages	
Customers who were removed involuntarily from the program even with CAPP funding	
Customers who were removed involuntarily from the program without any CAPP funding addressing their arrearages	
Customers who were removed involuntarily from the program for reasons aside from non-payment (specify the reasons)	
Customers who were removed voluntarily due to customer request or move out	
Actual debt forgiven by AMP in dollars (\$Million)	

**Table 2. COVID Long-Term Payment Plans Data as of December 31, 2022**

Total number of COVID payment plans have been issued (since launched)	
Number of active payment plans	
Number of payment plans completed or removed ahead of schedule (less than 24 months) due to the balance being paid full or partial by CAPP funding	
Number of payment plans completed ahead of schedule (less than 24 months) without any CAPP funding applied to their arrearages	
Number of broken payment plans due to non-payment with CAPP funding applied to their arrearages	

Number of broken payment plans due to non-payment without any CAPP funding applied to their arrearages	
Number of payment plan opt-outs due to customer request or move out	
Number of broken payment plans due to other reasons (specify the reasons)	
Average monthly installment plan amount (excluding current monthly bill amounts) for payment plans completed ahead of schedule without any CAPP funding applied	
Average monthly installment plan amount for broken payment plans (excluding current monthly bill amounts)	
Average monthly installment plan amount (excluding current monthly bill amounts) for kept (active) payment plans	
Average monthly installment plan amount (excluding current monthly bill amounts) for payment plans opt-outs	

### 3. Questions about the CBO Pilot Proposal

Energy Division staff conversed with the California Policy Lab at the University of California, Berkeley to seek input on the CBO Pilot Proposal. Generally, the California Policy Lab recommended (i) standardizing the outreach by CBOs and by the Large Energy Utilities to reduce potential differences in outreach across the pilot, (ii) making data collection by the CBOs uniform, (iii) collecting data on customer income levels and linking this income data to pilot outcomes, and (iv) creation of “control” (standard utility practices) and “treatment” (CBO outreach) groups by random customer assignment. The California Policy Lab also recommended additional metrics for the pilot.

Parties are invited to answer the following questions.

1. How should pilot education and outreach by the CBOs be standardized? What aspects of education and outreach (e.g. call scripts, communication methods) do you recommend standardizing across all utility territories?
2. How should pilot education and outreach by the Large Energy Utilities (to pilot participants who do receive and who do not receive CBO services) be standardized? What aspects of education and outreach do you recommend standardizing (e.g. content and timing of emails, calls, and text messages to participants about missed payment plan payments)? How should pilot education and outreach by the Large Energy Utilities to pilot participants who do not receive CBO services be designed to incorporate best practices (e.g. from the meet and confer report on payment plans)?
3. Do you recommend a working group or other process to support standardization of pilot education and outreach by CBOs and Large Energy Utilities?
4. Do you support the following additional pilot metrics proposed by the California Policy Lab?
  - a. Number of participants in the treatment group vs. the control group
  - b. Number of unique outreach attempts made to pilot customers
  - c. Number of attempted agreements (i.e. potential participants who came through the door but did not agree to participate)
  - d. Percentage of enrolled participants who are eligible for each service level tier
  - e. Percentage of participants who completed a case management action plan
  - f. Number of customers who completed the first six months and first twelve months of the case management program, stratified by tier eligibility

- g. For customers who unenrolled or withdrew, indicate what stage they left the program and, if feasible, why they left the program
  - h. For customers who were offered CBO services but declined to participate, arrearages at the time of declining service compared to subsequent arrearages by each month-end
  - a. Number and percentage of pilot customers who enroll in CARE or FERA
5. Should a customer who receives CBO case management be considered unenrolled or withdrawn from the pilot program if the customer does not respond to three consecutive calls or emails from the CBO?
6. How is the CBO Pilot Proposal similar to the Commission's Community Help and Awareness of Natural Gas and Electric Services (CHANGES) program in terms of the scope of work of CBOs or other aspects of pilot design? How is it different from the CHANGES program?
2. Random assignment to "treatment" (CBO outreach) and "control" (standard utility practices) has some analytical advantages for evaluating the causal impacts of CBO outreach compared to the status quo. Should these randomly-assigned "treatment" and "control" groups be stratified according to other variables, such as CARE participation or location? Are there any other concerns with this approach to the creation of "treatment" and "control" groups?

**IT IS SO RULED.**

Dated February 13, 2023, at San Francisco, California.

/s/ STEPHANIE S. WANG

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Stephanie S. Wang  
Administrative Law Judge