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R1807005

**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

**E-MAIL RULING ON ARREARAGE-RELATED ASSISTANCE PROGRAMS**

Dated October 13, 2025, at San Francisco, California.

/s/ ANDREW DUGOWSON

Andrew Dugowson  
Administrative Law Judge

**From:** Dugowson, Andrew <[Andrew.Dugowson@cpuc.ca.gov](mailto:Andrew.Dugowson@cpuc.ca.gov)>

**Sent:** Monday, October 13, 2025 4:59 PM

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**Subject:** R.18-07-005: Email Ruling on Arrearage-Related Assistance Programs

To the Service List for R.18-07-005, the Disconnections Rulemaking:

This e-mail ruling provides parties the opportunity to comment on a procedural path forward for three of the Commission's programs that were developed to assist customers in avoiding or paying down their past-due balances: the Arrearage Management Payment Plan Program (AMP), the Community Based Organization Arrears Case Management Pilot Program (CBO Pilot), and the Percentage of Income Payment Plan Pilot Program (PIPP Pilot). Opening comments are due October 24, 2025, and reply comments are due October 31, 2025.

### **PIPP Pilot**

On October 11, 2021, the Commission issued Decision (D.) 21-10-012, which ordered Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), Southern California Edison (SCE), and Southern California Gas Company (SoCalGas) (collectively, the Large Investor Owned Utilities (IOUs)) to design and administer the PIPP Pilot for four years. The purpose of the PIPP Pilot was to set a participant's utility bill payment amount at an affordable percentage of the participant's monthly income. D.21-10-012 further ordered the Large IOUs to contract with an independent evaluation contractor to assess the pilots' performance based on the first eighteen months of pilot data, and to serve the evaluation report on the service list for this proceeding no later than 25 months after the Commission approved the Large IOUs' PIPP Pilot proposals.<sup>[1]</sup> D.21-10-012 also ordered that within 60 days of the service of the evaluation report, the Large IOUs shall each file a Tier 2 Advice Letter to implement any modifications to the PIPP Pilot that were recommended by the evaluation report.<sup>[2]</sup>

On December 15, 2022, the Commission approved the Large IOUs' pilot proposals via Resolution E-5200. Pursuant to D.21-10-012 and a partial extension request granted by the Commission's Executive Director on January 14, 2024, PG&E filed and served the evaluation report on March 17, 2025. The evaluation report did not recommend specific modifications to the existing PIPP Pilot but instead provided two recommendations about future PIPP programs. First, the evaluation report recommended that the Commission adopt a permanent, smaller PIPP program targeted to customers especially burdened by their energy bills. Second, the evaluation report recommended that the Commission, in the long term, consolidate the PIPP program with the California Alternative Rates for Energy (CARE) program, which reduces income-qualified customers' bills by a fixed percentage. As the evaluation report did not recommend changes to the existing PIPP Pilot, no IOU filed a Tier 2 Advice Letter to implement any changes to the PIPP Pilot within sixty days of the service of the evaluation report.

### **AMP and the CBO Pilot**

On June 11, 2020, the Commission issued D.20-06-003, which created the AMP program to provide assistance to customers with past-due bills of \$500 or more who had received a disconnection notice from their electric utility. The Large IOUs would automatically enroll qualifying customers in the AMP program and provide those customers with a path to have their past-due balances forgiven after twelve on-time payments. Under D.20-06-003, AMP would have sunset in June 2024, but the Commission extended the deadline to October 1, 2026 via

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<sup>[1]</sup> D.21-10-012, OP 6, at 90.

<sup>[2]</sup> D.21-10-012, OP 7, at 90 to 91.

D.23-08-049, issued September 6, 2023. Additionally, D.23-08-049 laid out requirements for an evaluation of AMP, using the PIPP evaluation process as a model. The decision directed the Large IOUs to contract with an independent evaluator to complete an evaluation report by October 1, 2025. On October 1, 2025, SCE served a copy of the AMP evaluation report on the service list in this proceeding. This ruling orders SCE to file a copy of the AMP Final Evaluation Report to this proceeding as well.

Overall, the AMP evaluation report found that the AMP had positive impacts for customers who retained energy services throughout the evaluation period and recommends that AMP should continue. The evaluation report also made recommendations to improve the program.

On April 18, 2022, the Commission issued D.22-04-037 in Rulemaking 21-02-014 to require the development of the CBO Pilots in the instant proceeding. On February 20, 2024, the Commission issued D.24-02-046 creating such a program. The decision ordered the Large IOUs to contract with community-based organizations to provide case management services to assist up to 12,000 customers with managing their unpaid bills, enrolling in energy assistance and energy efficiency programs, and arranging bill payment plans. The decision also required the Large IOUs to contract with an independent evaluator to provide feedback and recommendations at two points: first, by October 17, 2025, the contractor, as part of a CBO Pilot working group, shall file an informal evaluation of the pilot program; second, by July 9, 2026, the evaluation contractor shall provide formal recommendations on the pilot.

#### **Procedural Path Forward for PIPP Pilot**

As described above, the PIPP evaluation had two recommendations: (1) adopt a permanent, smaller PIPP program targeted to customers especially burdened by their energy bills; and (2) consolidate the PIPP program with the CARE program, which reduces income-qualified customers' bills by a fixed percentage. The Large IOUs shall, and other parties may, file and serve comments addressing the following questions:

1. Which recommendations from the PIPP evaluation report should the Commission adopt, if any, and why?
2. Should the Commission terminate the PIPP pilot before its scheduled sunset date? Why or why not?
3. Should the Commission consider any other modifications to the PIPP pilot?

#### **Procedural Path Forward for AMP**

The AMP evaluation report found that AMP had positive impacts for customers who retained energy services throughout the evaluation period and recommended that AMP continue, with the following recommendations:

- AMP Eligibility: Require customers to have made at least one payment in the past six months to enroll in AMP (instead of the current requirement for one payment in the past 24 months).
- AMP Removal: Allow disconnection of AMP participants who become past due instead of removing them from AMP for missed payments. Disconnections should align with the Large IOU's current disconnection threshold. Unenroll AMP participants at the time of disconnection.
- IOU Bills: The Large IOUs should send an insert with their monthly bills that includes the original AMP arrearage, the amount forgiven each month if they pay their bill, the amount forgiven to date, and the amount remaining.
- Large IOU Communication: The Large IOUs should remind AMP participants one week before the bill date about the upcoming due date via text, email, and automated phone call. IOUs should also contact customers via these methods if they miss a bill due date. These changes should only be made to the extent permitted by law and if customers have opted into these communications methods. (The Large IOUs should review communication methods that customers have agreed to at the time of AMP enrollment to help ensure that customers receive messages about upcoming and missed bill dates.)
- Disconnections: The Large IOUs should be required to disconnect all customers in alignment with the Large IOU's current disconnection threshold if they do not have a documented medical condition. Prior to implementing this revised policy, there should be a broad education campaign to inform customers about available assistance and when the new policy will take effect. The new policy should be phased in to start with customers with the highest levels of arrearages and then work down to customers who just meet the Large IOU's disconnection threshold.

The Large IOUs shall, and other parties may, file and serve comments addressing the following questions:

1. Should the Commission allow the AMP to continue until its scheduled sunset date? Why or why not?
2. Which of the recommendations in the AMP evaluation report should the Commission adopt, and which recommendations should the Commission reject? Why?

3. Are there other modifications to AMP that the Commission should consider? Why or why not?

**Procedural Path Forward for CBO Pilot**

The CBO Pilot working group's informal recommendations are due October 17, 2025, and the final CBO Pilot evaluation report is due in July 2026. The Large IOUs shall file and serve the informal recommendations to the service list for the instant proceeding. The Large IOUs shall, and other parties may, file and serve comments addressing the following questions:

1. Which of the informal recommendations should the Commission adopt, and which recommendations should the Commission reject? Why?
2. Should the Commission should require the Large IOUs to file and serve a Tier 2 Advice Letter to implement any changes to the CBO Pilot Program recommended by those reports? If not, how should the Commission review and, where appropriate, implement the final CBO pilot recommendations due in July 2026? How will this approach ensure the Commission and interested stakeholders have the opportunity to review the CBO pilot's progress and implement necessary or beneficial changes.

The Large IOUs shall, and other parties may, file and serve opening comments addressing the questions in this ruling by October 24, 2025, with reply comments due October 31, 2025.

**Andrew Dugowson** (he/him)  
Administrative Law Judge  
California Public Utilities Commission

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