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California LifeLine Program.

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**OPENING COMMENTS OF THE UTILITY REFORM NETWORK ON THE
CUSTOMER PORTAL 2.0 STAFF PROPOSAL**



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I. INTRODUCTION

Pursuant to the schedule established in the Administrative Law Judge’s Ruling Inviting Comments on the Customer Portal 2.0 Staff Proposal, issued June 2, 2026, and confirmed in the Email Ruling Clarifying Due Dates for Comments Responding to the Administrative Law Judge’s Ruling Inviting Comments on the Customer Portal 2.0 Staff Proposal, issued June 10, 2026, The Utility Reform Network (TURN) timely submits these opening comments on the Staff Proposal: California LifeLine Direct Enrollment and Renewal Application Process Through Customer Portal 2.0 Release (Staff Proposal). TURN generally supports the Staff Proposal and commends Staff for taking steps to realize this important upgrade to the California LifeLine application process.

II. QUESTIONS TO GUIDE PARTY COMMENTS

- A. **Does the proposed eligibility-first determination model appropriately balance consumer protection, program integrity, and operational efficiencies? Please explain your response.**

Yes. TURN supports the creation of online LifeLine application options to make the program more accessible to eligible households. TURN incorporates by reference its past comments on the issue.¹ The enrollment processes envisioned in the Staff Proposal create an alternative to street teams—which the 2022 California LifeLine Program Assessment found

¹ See, e.g., Reply Comments of TURN and The Greenlining Institute on the Assigned Commissioner’s Ruling Requesting Comments on Implementation of California LifeLine Eligibility for Californians Without Social Security Numbers (filed in R.20-02-008 on Feb. 23, 2024) at 6-7; Opening Comments of TURN, The Greenlining Institute, and Unite-LA on the Administrative Law Judge’s Ruling Requesting Comments on Staff Proposal on Enrollment for Individuals without Social Security Numbers (filed in R.20-02-008 on May 10, 2024) at 6.

“reduce[] legitimacy and trust in the program” among consumers²—without eliminating the option for provider-assisted enrollment. The creation of additional enrollment pathways online and with the California LifeLine Third Party Administrator’s call center (TPA) mean that applicants do not need to find a pop-up tent or select service from a provider that provides enrollment assistance in-store, but those options could remain.

Further, the option to review all providers serving an applicant’s zip code on the California LifeLine website allows applicants to quickly determine their options and directly compare service providers’ offerings,³ which maximizes consumer choice and increases the likelihood that an applicant will be able to find and enroll in a plan that meets their needs.

Relatedly, TURN strongly supports the retention of a paper application option for applicants who request it. When updating the rules for California Connect (also known as the Deaf and Disabled Telecommunications Program), the Commission recognized that paper applications needed to remain available, despite the benefits of an online application.⁴ Here, too, a paper application is an important option for applicants who do not have regular internet or internet-enabled device access or lack the digital literacy skills to submit an online application.

B. Are there specific California low-income consumer populations that may experience challenges during the transition? If so, please describe those populations and recommend mitigation strategies for consideration.

² California LifeLine Program Assessment & Evaluation, Consensus and Collaboration Program and Institute for Social Research, California State University, Sacramento (May 2022) at 11-12, <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M588/K329/588329426.pdf> (“[S]takeholders reported concern about providing personal data via a Street Team for enrollment”).

³ Staff Proposal at 6.

⁴ D.26-02-059 (issued in R.23-11-001 on Mar. 6, 2026) at 20-21 (“[T]here could be various reasons why an otherwise potential California Connect applicant might not be able to access or utilize an online application process. Therefore, a hardcopy application option should be retained, and both the online and paper application should request the same information to the greatest extent possible.”)

As discussed, maintaining a paper application option is important for subscribers who may be unable to reliably access online applicants for various reasons.

Further, the creation of an online application process based around the California LifeLine website raises concerns about potential language barriers. The California LifeLine website currently supports seven languages.⁵ The Commission should ensure that TPA enrollment assistance and technical support is available in all languages supported by the website so that applicants do not face barriers if they need technical support or decide to use the TPA-assisted enrollment option.

The Staff Proposal states that applications that cannot be verified automatically or that require additional review may result in “follow-up requests for supporting documentation” from the TPA.⁶ For application verification in cases where an applicant needs to submit additional documentation, the Commission should ensure there is an option for applicants to submit copies of documents through paper mail. Not all applicants may have access to a computer and scanner or a means to take and upload a photo of supporting documentation to the California LifeLine website, and an electronic-only means of submitting documentation may prevent some subscribers from being able to complete their application. TURN notes that the proposed redlines to General Order 153-A continue to imply that subscribers can submit renewal documentation through paper mail.⁷

Finally, the Commission and TPA should ensure that the entire California LifeLine website meets web accessibility guidance and requirements, such as the Web Content Accessibility Guidelines. Accessibility should be a baseline consideration when designing the

⁵ See California LifeLine, <https://www.californialifeline.com/> (last accessed June 16, 2026).

⁶ Staff Proposal at 6.

⁷ See Staff Proposal, Attachment B, § 4.5.1.3.

webpages for the application process. Further, GO 153-A requires LifeLine applications forms to be available in large print.⁸ Ideally, there should be a control on the California LifeLine website for users to increase the size of webpage text so that there is access to the online equivalent of a large print application.

C. Are the proposed timelines for post-approval enrollments sufficient for Service Providers (i.e., once the TPA has notified a Service Provider that an approved applicant has selected them, the Service Provider has 48 hours to ‘accept’ the applicant)?

TURNs submits that the reasonableness of the 48-hour window for service providers to accept approved LifeLine applicants⁹ will depend on whether service providers are foreseeably pausing LifeLine enrollments for 48-hour periods or longer (such as for weekends or holidays). As a general matter, the window for service providers to accept approved applicants should be relatively short to ensure that approved applications do not languish unnecessarily.

As far as other timelines, the 45-day period for an approved applicant to select a service provider¹⁰ appears adequate, as it accommodates applicants who have intermittent or unreliable internet access. Similarly, TURN supports the Staff Proposal’s proposal to change the initiation of the LifeLine renewal process to match the federal LifeLine renewal timeline¹¹ if the reduction in mail processing allows the TPA time to adequately process all renewals in that window.

D. Are there operational challenges/risks Service Providers might encounter when transitioning to the Program-centric eligibility determination model? If

⁸ GO 153-A § 4.2.2.

⁹ Staff Proposal at 6.

¹⁰ *Id.*

¹¹ *Id.* at 9-10.

so, please describe the challenges and recommend mitigation strategies for consideration.

This question appears to be intended for participating LifeLine service providers. TURN reserves the right to reply in reply comments.

E. Is there a recommended transition period Service Providers anticipate needing to accommodate a successful transition to the proposed program-centric eligibility enrollment model through Portal 2.0?

As a general matter, TURN recommends an expeditious transition to the portal to build upon the success of the Customer Portal and increase access to California LifeLine as quickly as possible while creating a working application process that protects applicant data. TURN reserves the right to further respond to this question in reply comments.

F. Are there any proposals or concepts that parties suggest staff consider in a future Trusted Partnership Staff Proposal?

To create a truly functional Trusted Partner pathway, the Commission and stakeholders will have to build a statewide network of Community-Based Organizations (CBOs) and programs. The Commission cannot assume that every LifeLine applicant who could benefit from enrollment assistance through a Trusted Partner has access to a car or can take multiple hours out of their day to travel to a place where a Trusted Partner is providing assistance. Further, to ensure long-term participation of partners and, by extension, reliable sources of in-community enrollment assistance, participating CBOs should be fairly compensated for the assistance they provide.

To further increase access to LifeLine, TURN encourages the Commission and Staff to

design a Trusted Partner framework that encourages and facilitates the participation of organizations and programs that can provide enrollment assistance in languages and formats that the program does not currently support. California Connect is looking to the LifeLine program to develop a trusted partner framework that it can then replicate,¹² and there is considerable potential in creating a framework that encourages organizations and programs that serve people with disabilities and the Deaf community to provide enrollment assistance with both LifeLine and California Connect. For example, under the Staff Proposal, someone who is D/deaf could receive assistance from the TPA’s Call Center over the phone by using a relay service, but they may be more comfortable receiving enrollment assistance in American Sign Language from—and sharing their personal information with—an organization that serves their community.

III. ADDITIONAL ISSUES

A. **The Commission should create additional safeguards for benefits transfers through the portal.**

The Staff Proposal states that, to “strengthen unauthorized transfer protections,” the Customer Portal 2.0 will implement “new transfer functionality within the subscribers’ portal dashboard.”¹³ TURN understands this language to mean that the Customer Portal 2.0 will allow registered subscribers to initiate a transfer request within the portal, as well as a separate functionality to create a blanket lock on transfers of their benefits.¹⁴ If it is the case that subscribers can initiate a benefit transfer within the portal, TURN recommends the addition of an additional security measure to prevent unauthorized transfers in cases where another person has

¹² D.26-02-059 (issued in R.23-11-001 on Mar. 6, 2026) at 27-28, COL 5 (“The Lifeline program’s trusted partner proposal . . . should inform the CBO compensation model for California Connect.”)

¹³ Staff Proposal at 11.

¹⁴ *See id.*

fraudulently gained access to a user’s portal account. For example, a step to request a transfer could involve the California LifeLine website sending a code to the email address associated with the user’s account, which the user must enter to request a transfer.

B. TURN supports the creation of the proposed eligibility mapping tool.

The Staff Proposal states that Staff is considering developing an interactive mapping tool for the customer portal that would allow users to enter their address and receive address-specific information about LifeLine-qualifying programs.¹⁵ If implemented well, such a tool could be very useful—often, information about LifeLine eligibility appears as a list of programs, some of which are described in general or umbrella terms. Identifying specific programs available in someone’s area provides potential applicants with more actionable information.

TURN supports the development of an eligibility mapping tool, but this functionality should not delay the launch of the Customer Portal 2.0. The TPA and Staff could develop it after the online application process is available to the public.

IV. REDLINES TO GENERAL ORDER 153-A

A. GO 153-A should define and consistently refer to “qualifying assistance programs.”

The Staff Proposal recommends modifications to Section 4.1.1 of GO 153-A that would change “certain public assistance programs” to “qualifying assistance programs.”¹⁶ Section 4.2.1.2 also currently uses “public assistance program” when tasking LifeLine service providers are enrolled in benefits programs, but other portions of GO 153 also use “qualifying assistance

¹⁵ Staff Proposal at 16-17.

¹⁶ Staff Proposal, Attachment B, § 4.1.1.

programs,” with a list of the programs in Section 5.1.5.¹⁷ Because “qualifying assistance programs” is used much more frequently, TURN recommends that for consistency, the Commission also change the “public assistance program” in Section 4.2.1.2 for consistency and define the term in the definitions section with a definition that points to Section 5.1.5.

B. The Commission should adopt alternative redlines for certain sections clarity.

The Staff Proposal would modify Section 4.2.2.1 to add the phrase “which the Service Provider can then direct the customer on how to proceed as described under section 4.2.2” to the end of the sentence “If the California LifeLine Administrator cannot confirm the Customer’s continued eligibility, the Customer will be treated as a new California LifeLine Applicant and be subject to the Application Process.”¹⁸ However, “proceed” is a prepositional verb, and this redline is missing a preposition to go with it. For clarity, TURN recommends modifying this redlined phrase to read as “which the Service Provider can then direct the customer on how to proceed with as described under section 4.2.2.”

The Staff Proposal also proposes modifications to Section 4.2.2.2.2. Staff proposes the addition of the phrase “[i]f selecting the paper application pathway” at the front of a sentence describing the instructions a LifeLine service provider must give to an applicant.¹⁹ TURN recommends an alternative wording of “[i]f the Customer selects the paper application pathway” to clarify that the LifeLine applicant is the one who selects the paper application option.²⁰

¹⁷ GO 153-A §§ 4.2.1.2, 5.1.5.

¹⁸ Staff Proposal, Attachment B, § 4.2.2.1.

¹⁹ *Id.*, Attachment B, § 4.2.2.2.2

²⁰ *Id.* at 8 (“As with the current process, Service Providers would still be able to use established channels to request that the TPA initiate the paper application process if a customer asks the Provider for a paper application.”).

C. If LifeLine subscribers must notify the California LifeLine TPA about certain changes, the customer portal should clearly convey that information.

The Staff Proposal recommends redlines to Sections 5.4.2.5 and 5.6 that would require LifeLine subscribers to inform the TPA if they no longer qualify for the program or change addresses.²¹ As this change would be in addition to informing their LifeLine service provider of ineligibility, TURN recommends modifying the portal to explain that subscribers must inform the TPA of this information if the Commission makes these modifications to GO 153-A.

D. The Commission should update GO 153-A to consistently use the singular they.

GO 153-A currently uses varying combinations of third-person pronouns to refer to LifeLine applicants and subscribers, such as “he/she,”²² “they/he/she,”²³ “his/her,”²⁴ and “their/his/her.”²⁵ This language is inconsistent and cumbersome at best and unintentionally exclusive at worst. For consistency and simplicity, TURN recommends changing any pronoun reference to LifeLine applicants and subscribers to the singular they, which is widely accepted as grammatically correct and has been in use for centuries as a gender-neutral singular pronoun.²⁶

²¹ *Id.* at §§ 5.4.2.5, 5.6.

²² GO 153-A, § 4.2.2.

²³ *Id.* at §§ 4.2.2.3.1, 4.2.3, 4.2.4.1.

²⁴ *Id.* at § 2.4.

²⁵ *Id.* at §§ 4.2.2., 4.2.2.3, 5.1.4.

²⁶ *See, e.g.*, How do I use singular *they*?, Modern Language Association Style Center (Mar. 4, 2020), <https://style.mla.org/using-singular-they/>; Singular “They,” Merriam Webster, <https://www.merriam-webster.com/wordplay/singular-nonbinary-they> (“We will note that *they* has been in consistent use as a singular pronoun since the late 1300s; that the development of singular *they* mirrors the development of the singular *you* from the plural *you*” (emphasis in original)).

V. CONCLUSION

TURN supports the Staff Proposal with the above-discussed modifications and thanks Staff for their attention to this issue.

Dated: June 17, 2026

Respectfully submitted,

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