

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Order Instituting Rulemaking to Update
the California LifeLine Program

Rulemaking 25-11-005

**OPENING COMMENTS OF THE PUBLIC ADVOCATES OFFICE
ON THE ADMINISTRATIVE LAW JUDGE'S RULING INVITING COMMENTS
ON THE CUSTOMER PORTAL 2.0 STAFF PROPOSAL**

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I. INTRODUCTION

Pursuant to Rule 6.2 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits these opening comments on the Administrative Law Judge's Ruling Inviting Comments on the Customer Portal 2.0 Staff Proposal.¹ On May 27, 2026, Communications Division Staff released a Staff Proposal on the Customer Portal 2.0. This proposal contains six questions on which parties are requested to comment.²

The Commission should:

- Adopt the eligibility-first determination model, as it reduces reliance on street-team enrollment and aligns LifeLine with other state benefits programs;
- Provide targeted mitigation for vulnerable populations—rural, recently incarcerated, unhoused, domestic abuse survivors, and digital-divide families—through mobile LifeLine units and trusted partnerships; and
- Use the future Trusted Partnership program to leverage established state and federal partners to reach hard-to-reach households.

¹ *Administrative Law Judge's Ruling Inviting Comments on the Customer Portal 2.0 Staff Proposal*, June 2, 2026, R.25-10-005 (ALJ Ruling), at 2; *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*, June 10, 2026. Parties are requested to provide comments, including proposals, in response to questions in the ALJ Ruling by June 17, 2026.

² *Staff Proposal: California LifeLine Direct Enrollment and Renewal Application Processes Through Customer Portal 2.0 Release*, at 18, May 27, 2026.

II. DISCUSSION

1. Does the proposed eligibility-first determination model appropriately balance consumer protection, program integrity, and operational efficiencies? Please explain your response.³

Yes, the proposed model appropriately balances consumer protection, program integrity, and operational efficiencies as it gradually lessens the reliance on street team members for enrollment, who are the origin of several LifeLine issues. The Customer Portal will enable the LifeLine application to resemble other California-administered benefit programs, such as CalFresh and Medi-Cal, which should strengthen the perceived legitimacy of LifeLine. Additionally, the Customer Portal 2.0 will promote customer choice by allowing customers to see which service providers they can enroll with, which has historically not been possible.⁴

2. 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.

Customers who do not have preexisting access to a phone or internet connection would experience challenges as the Customer Portal 2.0 relies on accessing the California LifeLine website. The following populations would likely experience greater challenges during the transition:

- Rural communities
- People recently released from incarceration
- People who are unhoused
- Domestic abuse survivors
- Families disproportionately affected by the digital divide

³ Subheading questions are reprinted from ALJ Ruling, Attachment A, at 18.

⁴ “A complicated factor limiting consumer choice is that most eligible customers do not realize that they have a choice in Service Providers. Most focus group participants were unaware that there are a variety of Service Provider options to choose from until they were informed during focus group discussion.”

See, 2022 California LifeLine Program Assessment and Evaluation at 58. Accessible at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M478/K367/478367564.PDF>

Rural households are less likely to have a device or an internet connection at home to conduct the online enrollment for LifeLine.⁵ As rural households are most likely to lag behind suburban households in enrollment, the Commission should consider mobile LifeLine units similar to the county library mobile units⁶ and the County of San Mateo's mobile CalFresh office.⁷

The Commission should take advantage of the existing county library units as potential partnerships as some of the mobile units are specifically meant to reach rural households and households who do not have easy access to library services.

Commission, third-party administrator staff, or library staff can assist customers in navigating the LifeLine application process and provide devices to those who may not otherwise have access. As these are county library units, they will appear more legitimate to customers compared to a street team member and should have a positive impact on customer perception of LifeLine. The Commission should initially seek to partner with Lake County Library, Yolo County Library, and Tulare County Library⁸ to gauge the success of the mobile units as one option to overcome barriers to access that rural households may face.

For other marginalized communities, a similar issue exists where they may not have access to a device which would affect their ease of access to use the Customer Portal 2.0. For people who were recently released from incarceration, the Commission should partner with the Center for Employment Opportunities (CEO) to enhance the

⁵ See, Public Policy Institute of California (PPIC), *Digital Access in California*, July 2025, Table: *Digital equity gaps* persist, Accessible at: <https://www.ppic.org/publication/digital-access-in-california/>, Accessed June 4, 2026.

⁶ See, California State Library, *State Library Funds Creative, Green Mobile Library Solutions*, April 6, 2022, Accessible at: <https://www.library.ca.gov/wp-content/uploads/2022/04/Press-Release-2022-04-6-Mobile-Libraries.pdf>, Accessed June 4, 2026.

⁷ See, County of San Mateo, *CalFresh Mobile Office*, Accessible at: <https://www.smcgov.org/hsa/calfresh-mobile-office>, Accessed June 4, 2026.

⁸ These county library mobile units serve primarily suburban or rural populations with their grants specifically mentioning increasing access to rural populations.

Returning Citizens Stimulus (RCS)⁹ program. As RCS offers those recently released from incarceration job search assistance and other support in addition to a direct cash payment,¹⁰ a lowered phone bill and a potential free device would provide this population with easier access to benefits programs such as LifeLine or CalFresh. The Commission could also opt for a similar program to the University of California, Davis' SAFE-T program, which offered free smartphones to those recently released from incarceration.¹¹ Both methods would increase the likelihood that someone who is recently released has access to a device and could access the Customer Portal 2.0.

To ensure people who are unhoused have access to the LifeLine application, the Commission should partner with organizations that work with shelters, including low-barrier shelters,¹² as well as the California Department of Social Services' (CDSS) Housing and Homelessness Division.¹³ As shelters often have resources to help people who are unhoused learn and enroll in benefits programs, the Commission can add another resource to assist this population. Additionally, staff at shelters or community-based organizations (CBOs) will reach out to people who are unhoused, unlike street teams or traditional stores, who would be less likely to assist them.

To assist those persons who have or currently experience domestic abuse, the Commission should mirror the federal Lifeline's Survivor Benefit. This benefit helps

⁹ See, CEO, *Returning Citizens Stimulus (RCS) Programs*, Accessible at: https://cdn.prod.website-files.com/68947d34a0336d711a4a12fc/68947d34a0336d711a4a15a5_CEO-RCS-1-Pager.pdf Accessed, June 9, 2026.

¹⁰ See, Weber, Christopher, *Some Californians released from prison will receive \$2,400 under new state re-entry program*, December 8, 2023, Accessible at: <https://apnews.com/article/california-prisons-reentry-payments-cash-72baa30af04fe525cb396f8e6864dbcf> Accessed June 9, 2026.

¹¹ See, UC Davis Health, *UC Davis Health launches digital program to support people after incarceration*, July 8, 2024, Accessible at: <https://health.ucdavis.edu/news/headlines/uc-davis-health-launches-digital-program-to-support-people-after-incarceration/2024/07>, Accessed June 12, 2026.

¹² Low barrier shelters are shelters that have very low or no entry prerequisites allowing them to serve a much wider unhoused population.

¹³ See, CDSS, *Housing and Homelessness Division*, Accessible at: <https://www.cdss.ca.gov/inforesources/cdss-programs/housing-programs> Accessed June 9, 2026.

domestic violence victims receive a separate voice line from their abuser.¹⁴ ¹⁵ The Commission should mirror CalWORKs flexible program requirements,¹⁶ which allow victims to obtain a program waiver and temporarily enroll without facing significant barriers. Survivors would then have access to their own LifeLine device and plan to properly enroll in LifeLine while also granting the ability to contact other necessary services to overcome their current situation.

Families without a reliable internet connection or a device to access the internet¹⁷ would find it difficult to access the Customer Portal 2.0. To combat this, the Commission should reach out to school districts that have Community Eligibility Provision (CEP)¹⁸ eligible schools to improve outreach to families that may otherwise be unable to enroll. As schools can only become eligible for CEP if a certain percentage of their student population are identified to need meal assistance through socioeconomic data, CEP schools can serve as a means to reach disadvantaged households. Expanding LifeLine outreach to CEP schools would also increase the reach of LifeLine and make more parents aware of their ability to enroll in LifeLine, which could help provide access to affordable internet services for their families.

¹⁴ See, *Survivor Benefit*, Accessible at: <https://www.lifelinesupport.org/survivor-benefit/>, Accessed June 9, 2026.

¹⁵ Survivors may not have access to their own device due to their abuser, this could prevent them from enrolling in LifeLine and limit a survivor's ability to stabilize.

¹⁶ See, CDSS, *Domestic Abuse*, Accessible at: <https://www.cdss.ca.gov/inforesources/cdss-programs/calworks/domestic-abuse>, Accessed June 9, 2026.

¹⁷ See, PPIC, *Digital Access in California*, July 2025, Accessible at: <https://www.ppic.org/publication/digital-access-in-california/>, Accessed June 12, 2026.

¹⁸ CEP is a subset of the National School Lunch Program that offers eligible schools no price meals to all students without the need for families to submit a meal application or any other documentation displaying their need for a free meal.

See, *Community Eligibility Provision*, Accessible at: <https://www.fns.usda.gov/cn/cep>, Accessed June 9, 2026.

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

The Commission should collaborate with existing state organizations and federal programs to strengthen the Trusted Partnership program. To reach rural and other hard-to-reach households, the Commission should seek to partner with the California Primary Care Association (CPCA)¹⁹ and the Foundation for California Community Colleges (FCCC).²⁰ As CPCA can reach out to its network of community health centers, it can help the Commission inform the 4.2 million Medi-Cal patients who attended the health centers in 2025 about LifeLine.²¹ As this population is already eligible to enroll in LifeLine, this partnership could improve the Commission’s reach through a trusted entity such as these clinics. Partnering with the FCCC would further benefit LifeLine, as there is already a CalFresh Outreach Project that relies on peer-to-peer support to educate students on the CalFresh program.²² Establishing a partnership with the FCCC would reach a new population that is most likely missed by current street team efforts.

The Commission should also expand existing partnerships with organizations that assist with other programs, such as the Center for Independent Living (CIL). The Commission’s own California Connect program has previously partnered with CIL to host administrative committee meetings and public participation hearings at the Ed Roberts Campus in Berkeley.²³ The CIL could help connect the Commission to CBOs

¹⁹ CPCA represents community health centers across California, which primarily serve low-income populations and those who would not have access to healthcare otherwise. The CPCA website can be found at: <https://cpc.org/>.

²⁰ The FCCC is a nonprofit partner to California Community Colleges that seeks to improve the economic and social mobility of Californians.

²¹ See, CPCA, *2025 California State Profile of Community Clinics and Health Centers*, Accessible at: <https://cpcadmin.sharepoint.com/sites/CPCAPublicSite/Shared%20Documents/Forms/AllItems.aspx?id=%2Fsites%2FCPCAPublicSite%2FShared%20Documents%2FContent%2FData%2F2025%5FCA%5FState%5FProfile%5Fof%5FCHCs%2Epdf&parent=%2Fsites%2FCPCAPublicSite%2FShared%20Documents%2FContent%2FData&p=true&ga=1> Accessed June 9, 2026.

²² See, FPCC, *CalFresh Outreach Project*, Accessible at: <https://foundationccc.org/our-work/equity/supporting-students-basic-needs/calfresh-outreach-project/#program-services>, Accessed June 9, 2026.

²³ See, Decision (D.) 26-02-059, Decision Establishing Revisions and Updates to The Deaf and Disabled

whose constituents are primarily people with disabilities in order to ensure they are able to receive information and assistance regarding the LifeLine application. This would also grant people with disabilities an official channel to offer feedback to the Commission on how to improve the LifeLine website and application process to be more accessible. Improving the accessibility of both aspects would improve the overall experience for all applicants to LifeLine.²⁴

Additionally, to further improve the Trusted Partnership Program, the Commission should consider adding CEP schools, as they can help with outreach and assist low-income families in enrolling in LifeLine. As the schools already serve low-income households, the Commission could offer pamphlets to students to take home to parents and use existing school equipment to help enroll families. As the California Teleconnect Fund (CTF)²⁵ and federal E-Rate²⁶ program aid schools in receiving the broadband-capable devices, CEP schools will be equipped with the devices to help households enroll.

Telecommunications Program (California Connect), at 4.

²⁴ See, World Wide Web Consortium, *Introduction to Web Accessibility*, Accessible at: <https://www.w3.org/WAI/fundamentals/accessibility-intro/>, Accessed June 9, 2026.

²⁵ CTF is a Commission-operated public purpose program that provides eligible organizations, such as schools, libraries, and community colleges, a discount on broadband and broadband services.

²⁶ The E-Rate program provides discounts to schools and libraries to make telecommunications and information services more affordable.

III. CONCLUSION

Cal Advocates urges the Commission to adopt the above recommendations to minimize barriers to the LifeLine application and Customer Portal 2.0 for vulnerable populations and to strengthen the future Trusted Partner Program. In sum, Cal Advocates supports the eligibility-first determination model, recommends targeted mitigation for the vulnerable populations identified above, and urges the Commission to build the future Trusted Partnership program around established state and federal partners.

Respectfully submitted,

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