

Decision 18-12-013 December 13, 2018

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

**DECISION ADOPTING INTERIM RULES TO REDUCE RESIDENTIAL
CUSTOMER DISCONNECTIONS FOR CALIFORNIA-JURISDICTIONAL
ENERGY UTILITIES**

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**DECISION ADOPTING INTERIM RULES TO REDUCE RESIDENTIAL
CUSTOMER DISCONNECTIONS FOR CALIFORNIA-JURISDICTIONAL
ENERGY UTILITIES**

Summary

This decision adopts interim rules applicable to California-jurisdictional gas and electric utilities and are designed to reduce the number of residential customer disconnections and to improve the reconnection processes for disconnected customers. Customers' access to electric and gas service is critical to their economic and social stability and well-being. The Commission has implemented policies and procedures to reduce gas and electric utility service disconnections; however, the rate of customer disconnections continues to rise. Accordingly, the instant rulemaking has been instituted with the goal of developing policies and rules to reduce the statewide level of gas and electric service disconnections for nonpayment by residential customers.

This decision adopts interim rules to take effect immediately on an emergency basis to provide rapid relief while we consider longer term solutions. We apply these interim rules to large investor owned gas and electric utilities in California. We impose a goal for limiting disconnections to 2017 recorded levels per utility. We also modify the existing rule prohibiting disconnections during extreme weather conditions. The utilities currently must not disconnect residential customers during extreme weather conditions based on a 24-hour look-ahead. Today's decision extends this look-ahead period from 24 to 72 hours to provide greater customer protection from being disconnected when weather impacts are the most severe. In identifying vulnerable customers to be protected against disconnection, we shall include any household on medical baseline or life support and for customers age 65+ as defined in Decision 16-09-016 for senior citizens.

We leave this proceeding open to consider additional policies, rules, and regulations to address issues to reduce the rate of customer disconnections.

1. Factual Background

On September 28, 2017, Governor Brown signed Senate Bill (SB) 598 (Hueso 2017) into law. SB 598 acknowledges that disconnections of gas and electric utility customers have been rising and notes the public health impacts in terms of hardship and stress resulting from disconnections, especially among vulnerable populations.¹

California's electric and natural gas investor-owned utilities (IOUs) each have differing procedures and protocols pertaining to disconnection for failure to timely pay for service and as well as differing procedures for reconnection. Some aspects of disconnection and reconnection processes occur pursuant to Commission-adopted rules and policies. Other aspects are voluntary and are not enforced by Commission rules at all. Although the impetus for disconnection, repayment options, and reconnection times, differ across the IOUs, the ramifications of disconnection for customers can be far-reaching. The compounding effects of disconnection include disruption of the customer's normal daily activities (*e.g.* potentially, the ability to maintain employment,) as well as broad public health and social impacts associated with lack of electric and gas service.

Among other things, SB 598 requires the Commission to develop rules, policies or regulations with a goal of reducing the statewide disconnection rate of

¹ The Commission's Policy and Planning Division (PPD) also issued a paper in December 2017 finding that, aside from a brief slowdown in 2010, disconnections have been rising. Since 2011, the number of disconnections has steadily increased from the paused state in 2010.

gas and electric utility customers by January 1, 2024. The Commission is also required to analyze the impacts on disconnection rates of any utility rate increases in each utility's general rate case. SB 598 also sets forth circumstances under which a customer shall not be disconnected for nonpayment, including a customer receiving a medical baseline allowance, a customer (or member of their household) receiving hospice care, customer dependence on life-support equipment, or the presence of medical conditions requiring electric and natural gas service to sustain life or prevent deterioration of the medical condition.

Through the instant rulemaking, we intend to implement specific requirements in SB 598. We also intend to analyze the current disconnection paradigm more broadly to determine if more effective structures or policies can be adopted to reduce disconnections, reduce costs and improve the disconnection process across utilities. Through the instant rulemaking, we intend to undertake a comprehensive assessment of the root causes of (or events that correlate with) residential customer disconnections while also evaluating the rules, processes and procedures regarding disconnections and reconnections at both a statewide and utility specific level.

The scope of this rulemaking will build upon previous measures adopted in Rulemaking (R.) 10-02-005 to reduce disconnection rates during the Great Recession through improved customer notification and education. Decision (D.) 10-07-048 adopted interim actions to reduce disconnections before the 2010-2011 winter season. D.10-12-051 approved a settlement agreement to address disconnection practices of the major IOUs.

1.1. Procedural Background

On July 20, 2018, the Commission instituted the instant rulemaking to consider new approaches to disconnections and reconnections to improve energy

access across California's electric and gas investor-owned utilities. A prehearing conference (PHC) was held on August 15, 2018. The *Assigned Commissioner's Phase 1 Scoping Memo and Ruling and Request for Comments on a Proposed Pilot Program* (Scoping Memo) issued on September 13, 2018.

This rulemaking names as respondents the four largest electric and natural gas investor-owned utilities (IOUs). However, disconnections also occur within the service territories of small and multi-jurisdictional utilities under our jurisdiction. As such, the small and multi-jurisdictional gas and electric corporations are also respondents.² California community choice aggregators (CCA) are not identified as respondents because CCA disconnections are managed by the interconnecting utility. However, CCA participation in this proceeding has been encouraged.

The Scoping Memo identified two phases for this rulemaking. Phase 1 is to adopt policies, rules or regulations with a goal of reducing, by January 1, 2024 or before, the statewide level of residential gas and electric service disconnections for nonpayment. Phase II will take a broader approach to the evaluation of residential natural gas and electric disconnections with the goal of determining if the disconnection rate can be reduced through broader reforms and new preventive approaches.

² The smaller IOUs named as respondents are: Southwest Gas Company, Liberty Utilities (CalPeco Utilities) LLC, Bear Valley Electric Service, a division of Golden State Water Company, PacifiCorp, Alpine Natural Gas Operating Company, West Coast Gas Company, Inc. We realize that the smaller IOUs may have unique issues that the larger utilities do not have. Therefore, we will address what policies should be implemented by the smaller IOUs in a separate phase of Phase I of this proceeding. However, we encourage the smaller IOUs to be proactive in their efforts to reduce service disconnections in their service territories while the Commission further develops this proceeding.

The Scoping Memo provided notice and opportunity to comment on the planned adoption of interim rules to reduce the rate of disconnections. As set forth in Section 4.1 through 4.3 of the Scoping Memo, the parties were provided the opportunity to comment on these proposed interim measures. Reply comments were also served. The utilities were directed to be prepared to implement adopted interim measures as quickly as possible.

Opening Comments were filed on September 18, 2018, by Pacific Gas and Electric Company (PG&E), the Public Advocates Office at the CPUC (The Public Advocates Office, Formerly the Office of Ratepayer Advocates or ORA),³ Center for Accessible Technology and the National Consumer Law Center (CforAT and NCLC), Southern California Edison Company (SCE), The Utility Reform Network (TURN), collectively, by Bear Valley Electric Service, a division of Golden State Water Company, Liberty Utilities (CalPeco Electric) LLC (Liberty CalPeco), and PacifiCorp dba Pacific Power (collectively, the California Association of Small and Multi-Jurisdictional Utilities (CASMU), the Coalition of California Utility Employees (CUE), GRID Alternatives (GRID), San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas), Utility Consumers' Action Network (UCAN), and Southwest Gas Corporation (SWG) also filed opening comments. Reply comments were filed on September 24, 2018.

No evidentiary hearings were held. The basis for this decision is the record developed through the above-referenced filed comments.

³ At the time of filing its comments, the Public Advocates Office was identified by its previous name, the Office of Ratepayer Advocates.

2. Preliminary Issues to be Resolved

2.1. Interim Rules versus Pilot Program Characterizations

In the Scoping Memo, the interim measures being considered were defined as a “Pilot Program.” The Center for Accessible Technology and National Consumer Law Center (CforAT and NCLC) argue, however, that the interim measures proposed in the Scoping Memo are not pilot programs as typically defined by the Commission. CforAT and NCLC describe the proposals as interim mechanisms, interim protections, and interim rules. The Public Advocates Office supports the use of CforAT and NCLC proposed terminology, arguing that the temporary measures, as described in the Scoping Memo, are inconsistent with the Commission’s previous definition of pilots.

2.1.1. Discussion

We agree with the terminology proposed by the parties for purposes of characterizing our interim rules as adopted herein. We conclude that using the terminology “Pilot Program” is not the most descriptive of the actions we adopt herein. We shall hereafter refer the measures being adopted herein as interim rules, rather than as the “Pilot Program.”

2.2. Applicability of Interim Rules to Smaller Utilities

CASMU asks that the smaller California-jurisdictional utilities not be made subject to the interim rules being adopted here. CASMU notes that each of its member utilities has less than 50,000 customers in California and serves in rural and/or mountainous regions of the state. CASMU argues that given the small customer base of its members, their utility planning effort and participation in Commission proceedings is more limited compared to large IOUs.

Given the small size of the customer base, CASMU argues that it is relatively more difficult and/or disproportionately more burdensome, for customers of these small utilities to absorb new program costs, with cost sharing or cost subsidization among or across customers. CASMU argues that implementing these interim rules would create a disproportionate cost burden for the smaller customer base. CASMU also argues that SB 598 exempted CASMU members from the requirements of that enacted statute. For these reasons, CASMU argues that its members should be excluded from the requirements of the interim rules being enacted in this decision.

The Public Advocates Office, however, interprets the scope of the Commission's interim rules to be statewide, although the Scoping Memo does not specify the population to be covered.

2.2.1. Discussion

Although SB 598 only requires the Commission to adopt rules for the four major electric and gas utilities, we recognize that customer disconnection concerns affect utility customers statewide. However, we also recognize that the smaller IOUs may have unique circumstances that the other larger IOUs do not face. Therefore, we will not apply these interim rules to the smaller IOUs at this time. However, we will evaluate what procedures shall be applied to the smaller IOUs in a separate and distinct phase of this proceeding. However, since disconnections are a statewide concern, we encourage the smaller IOUs to actively work on appropriate solutions while we further develop the record concerning the unique issues that may impact the smaller IOUs.

2.3. Memorandum Account Treatment of Costs

PacifiCorp initially proposed a memorandum account be established for recovery of incremental additional costs incurred by utilities in connection with the implementing these interim rules. PacifiCorp argues that in addition to enabling utilities to recover incremental costs related to this program, a memorandum account would serve as means of tracking and recording cost data that can be used to develop the final requirements that emerge from this proceeding. However, as discussed in section 2.2.1, the smaller IOUs are being exempted from the interim rules for the time being and any rules pertaining to the smaller IOUS will be conducted in a separate phase of this proceeding. Therefore, PacifiCorp's argument is currently moot.

PG&E and SCE both requested that the Commission allow them to establish a memorandum account in their opening comments, which were filed on November 19, 2018. We will discuss this request in Section 2.3.1, below.

2.3.1. Discussion

PG&E and SCE failed to show in opening comments that the interim rules will result in any incremental costs to them. We decline to authorize memorandum account recovery of incremental costs relating to incremental costs that may be incurred in connection with implementing the interim rules adopted herein. We are not persuaded that incremental costs associated with implementing these rules are of such significance as to warrant authorization of memorandum account treatment. We note that SB 598 requires the Commission to analyze the impacts on disconnection rates of any utility rate increases in each utility's general rate case. For the limited purposes of the interim rules adopted herein, however, we find insufficient basis to institute memorandum account treatment of costs at this time. Also, we are not persuaded that the proposal is

sufficiently defined as to how to segregate the specific costs that would be eligible for memorandum account treatment, and how such costs would be distinguished from other costs typically incurred in the course of business. Given our goal of implementing these rules quickly, we have insufficient basis to approve all of the terms and conditions that would apply to a memorandum account and decline to grant such a request at this time.

2.4. Reporting Requirements on Arrearages

CforAT and NCLC note that utilities currently collect monthly data on arrearages and disconnections for quarterly reports and recommends that utilities provide reports on arrearages each month that an interim disconnections cap is in place. CforAT and NCLC note that in R.10-02-005, struggling households experienced increased arrearage amounts following a limitation of residential disconnections for non-payment.

The Public Advocates Office agrees that monthly reporting of arrearages would help parties assess the impact of each of the interim measures. For the duration of the interim measures, the Public Advocates Office believes that all IOUs should be required to file in this proceeding the arrearage data on a monthly basis.

2.4.1. Discussion

We conclude that it is acceptable for the large investor-owned utilities⁴ to report on arrearages and disconnections on a monthly basis as suggested by CforAT, NCLC and the Public Advocates Office. We require all respondent utilities to report on arrearages and disconnections on a monthly basis for the

⁴ PG&E, SCE, SDG&E, SoCalGas.

duration of the interim measures.⁵ An updated version of the data reporting template as provided in the September 12th ruling in this proceeding is attached to this decision (Appendix B). The large IOUs are required to submit the information requested in the updated template on a monthly basis. This requirement supersedes the quarterly reporting requirement from the September 12th ruling. Monthly reports should be filed and served on the 20th of each month (or the next business day thereafter).

3. Adopted Interim Rules

We adopt the interim rules set forth below to reduce the rate of customer disconnections. These rules shall remain in effect pending a subsequent Phase I decision or until the Commission directs otherwise. These rules are adopted based on the proposal that appeared in preliminary form in the Assigned Commissioner's Scoping Memo. These rules: (a) prohibit disconnection of designated vulnerable customers and (b) prevent disconnections during prescribed extreme weather events. This decision also adopts a goal of limiting the rate of disconnections to 2017 levels. We have considered parties' comments in response to the Scoping Memo, and have made adjustments, as appropriate, in adopting these interim rules.

3.1. Limiting Disconnection Rates to 2017 Recorded Levels

To ensure no further increases in disconnections occur, and that a path towards reductions is ensured, the Scoping Memo proposed to establish a disconnection rate cap for each IOU at the IOU's 2017 disconnection rate.

⁵ This requirement does not apply to small, multi-jurisdictional utilities such as Southwest Gas or any other entity not included in the Commission's reporting requirements under Pub. Util. Code 910.5.

Parties generally support the proposal to establish a disconnection rate cap set at each of the IOUs' respective 2017 disconnection rates. Several IOUs and other parties, however, express concern regarding risks and unintended consequences of establishing a disconnection rate cap across all customers. SCE argues that disconnection rate cap could provide arbitrary and unnecessary relief to customers not at high risk of being disconnected and potentially ignore customer behavior leading to disconnection of service. PG&E expressed concerns regarding potential of unintentional consequences of a disconnection cap, including: (1) higher balances for customers subject to disconnection; (2) shifting of costs to other customers due to nonpayment; and (3) potential gaming as the cap is reached.

SDG&E and SoCalGas request that any disconnect cap be analyzed before implementation, or, if the Commission decides to move forward with a cap, it be set at 3.95% for SDG&E and 2.4% for SoCalGas. This represents an *increase* from 2017 levels. SoCalGas and SDG&E argue that the caps set at 2017 levels would penalize them for positive performance, depriving them of flexibility in managing disconnections.

SDG&E and SoCalGas also question why 2017 data should be used for capping disconnections, other than that it represents the most recent year. They argue that disconnection rates can be affected by weather, economic, and other conditions, all of which should be considered when adopting a cap.

TURN advocates quick implementation of the interim protections for residential customers to prevent further increases.

SCE and PG&E both propose to limit the disconnection rate cap to only Phase 1 of this proceeding. TURN argues that the pilot shall last for the duration

of this proceeding, or until annual targets for reduced disconnections are adopted.

SCE proposes to apply the disconnection rate cap only to vulnerable customer populations instead of to all residential customers. TURN responds, however, that SB 598 mandated reductions in disconnections for *all* residential customers by 2024, not just vulnerable customers.

TURN expressed concerns that because disconnections have been increasing, and this proceeding could take a prolonged period to resolve, interim protections are necessary to prevent further increases in disconnections. Otherwise, the Commission could potentially be mandating a reduction from a higher level of disconnections and end up with the same or higher disconnection levels compared to when SB 598 was passed.

The Public Advocates Office supports immediate adoption of the interim measures but agrees with the IOUs that the proposed measures raise questions about implementation that could result in inconsistent application across IOU service territories, and unintended consequences.

CforAT and NCLC note the risks of increased arrearages, and state that imposing a hard cap without additional guidance would eliminate the ability of both the Commission and utilities to directly target relief to those customers most in need. SWG supports aspects of the disconnection rate cap pilot, but questions how the disconnection rate cap would be calculated or implemented.

The parties made various comments about the disconnection cap in their comments on the proposed decision. For the most part, the parties accept using the 2017 rates to set the interim disconnection cap, with the only exception being SDG&E and SoCalGas.

SCE warns in its comments that there may be unintended consequences as a result of the disconnection cap and advises that the Commission should gather more data before implementing the cap. PG&E requests that there be a delay in implementing the cap until the first full month following adoption and that the monthly cap should be based on PG&E's monthly customer account population, which may fluctuate from month to month. SDG&E and SoCalGas strongly oppose the cap and allege it is unfair because they have the lowest number of disconnections for 2017. SDG&E contends that preventing any disconnections for a month could likely lead to higher arrearages for some customers and this will be difficult to pay off and thus make reconnections more difficult for them.

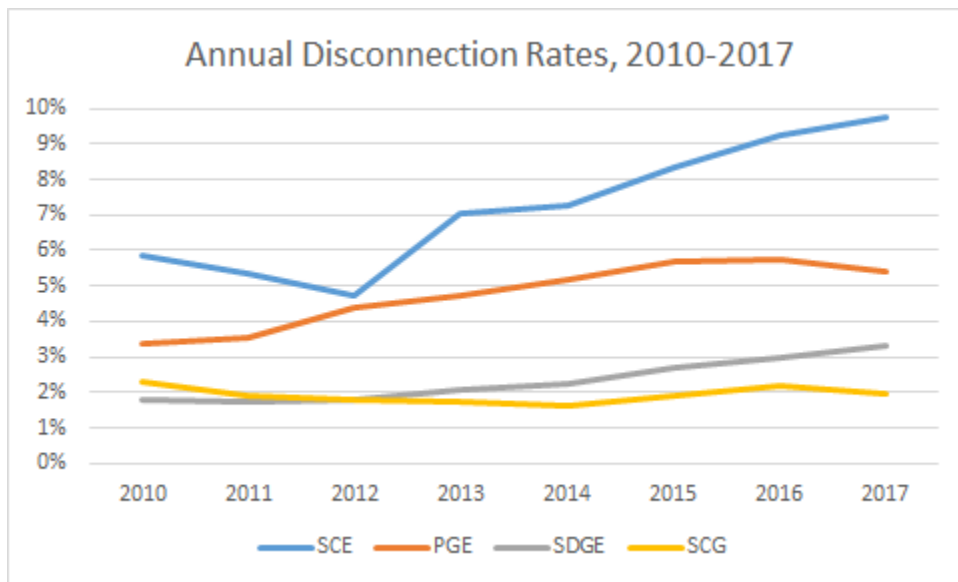
CforAT and NCLC support the use of an absolute cap, but recommends that it not become effective until January 2019 since the utilities do not disconnect customers during the holidays. UCAN suggests that the cap should be set at 95 percent of the 2017 levels. TURN opposes any modification of the cap, but proposes allowing SDG&E a three-month grace period to implement the cap. GRID supports the use of a cap and recommends that the Commission require utilities to minimize disconnections of certain categories of vulnerable customers as they manage disconnections under the cap.

3.1.1. Discussion

We shall require each of the large IOUs to set a goal of limiting residential customer disconnections to the rate of disconnections recorded in 2017. While the ruling proposed a hard cap on disconnections at 2017 levels, this decision adopts a soft cap or goal to limit disconnections to 2017 levels. A separate phase of the proceeding will address the appropriate goal for the smaller IOUs.

We deny requests to postpone implementation of this goal until further vetting and workshops occur. To stem the rising incidence of disconnections,

immediate implementation of the goal is needed to offer customers some form of immediate relief. Disconnection rates have been rising in the large IOUs since the Commission began tracking disconnection rates in 2010. As the below chart shows, the disconnection rates of SCE and SDG&E have increased over the years, while SoCalGas's annual disconnection rates remain relatively steady around 2%. PG&E also shows an overall growing trend in disconnections despite the disconnection rate declining slightly last year.



Source: Data were compiled by the Energy Division, based on the Quarterly Disconnect Data Reports submitted by IOUs as a requirement of R.10-02-005.

We recognize that other metrics besides 2017 data arguably might be used to establish the goal, as certain parties propose. On balance, however, we conclude that 2017 recorded levels provides a more straightforward, metric that can be implemented quickly. Since 2017 is the most recent year for which we have complete data, encouraging the large IOUs to limit disconnections to 2017 rates will help curb the rising disconnection rate. This decision aims to implement immediate interim relief, which includes limiting the number of

customers experiencing disconnection. We therefore adopt 2017 data as the basis for utilities to establish their goals.

We adopt a goal, rather than a hard cap, for the large IOUs due to concerns expressed in comments about the unintended consequences of a hard cap. These consequences include higher arrearages for those who avoid disconnection as a result of a cap and the possibility of ratepayers who are current on their energy bills subsidizing those who are behind on their energy bills. Under existing rules and policies that differ across IOUs, some customers incur large amounts of arrearages before disconnection, while other customers are disconnected when their debt to the utility is relatively low. As this decision offers the large IOUs more flexibility by establishing a goal rather than a hard cap, we direct the large IOUs to use that flexibility to manage disconnections in a way that limits the number of customers experiencing disconnection while also minimizing the growth of arrearages. Hard caps and reductions will be deliberated in Phase I of this proceeding.

To establish the goal, Appendix A of this decision sets forth 2017 disconnection data per utility. Specifically, each utility shall calculate an absolute number (as opposed to a percentage) that will be its goal for the maximum number of disconnections in its service territory. To calculate the absolute number, the utilities shall apply the 2017 disconnection percentages to their residential populations when this decision goes into effect. The calculation of the absolute number should be included in the IOUs' first monthly report of 2019. Until or unless ordered otherwise by this Commission, large IOUs should endeavor to keep the number of disconnections implemented for each subsequent year below the annual disconnection goal.

If any of the large IOUs exceed the annual disconnections goal, within 60 days that IOU must file a report with the Commission explaining:

- 1) why the utility is exceeding the goal,
- 2) what steps were taken by the utility to manage disconnections to remain below the goal, and
- 3) why those steps were insufficient in limiting disconnections to the established goal.

The report must also be served to the service list of this proceeding. Establishing reporting requirements for the large IOUs if they exceed the goal, in addition to the reporting requirements in Section 2.4.1, will hold the large IOUs accountable as they manage their disconnection rates. The reporting requirement will remain in effect for as long as the disconnection goal remains in effect.

We deny SCE's request to limit the disconnection cap only to vulnerable customer populations. As noted by TURN, the Commission is required by SB 598 to develop policies, rules, or regulations to reduce residential disconnections by January 1, 2024 for *all* residential customers, not just vulnerable customers. SB 598 created a separate section of the Pub. Util. Code Section 779.3, to address additional protections specifically for vulnerable customers. We thus shall impose the disconnections goal such that it applies to all residential energy customer disconnections.

We also deny the request of SDG&E and SoCalGas to set their disconnection caps at 3.95% and 2.4% respectively. We find no justification to deviate from 2017 recorded levels in setting the goal. Although SDG&E claims it has the lowest disconnection rate among the major electric utilities, it has increased its monthly residential disconnections from 1,795 per month in 2010 to 4,248 per month in 2018, a 137% *increase*. SDG&E is now seeking to increase its

disconnection levels even further. However, we recognize that implementing this goal immediately for SDG&E may severely limit their ability to disconnect customers for nonpayment. Therefore, we agree with the recommendation of TURN and will grant SDG&E a three-month grace period to manage its disconnections. The goal for the remaining covered utilities shall be effective January 1, 2019.

SDG&E's 2018 residential disconnections are already projected to be 0.37% higher than 2017 levels. SDG&E seeks authority to *further increase* its disconnection rate by another 0.27%. SoCalGas requests to increase its disconnection rate to 2.4%, even though it is only currently trending at 2.1% for 2018. We deny this request. SDG&E's disconnection goal is set at 2017 recorded levels.

The goal for limiting residential customer disconnections for large IOUs will remain in effect until the end of Phase 1 of this proceeding and no later than 18 months from this decision. Setting a definitive timeframe for the disconnection goal provides certainty that reforms will take place in a timely manner to address some of the causes of high rates of disconnections. This proceeding will consider and adopt policies to ensure that customers having difficulty paying their energy bills receive interventions to help manage their bills and prevent disconnection. The policies developed at the close of Phase 1 will go beyond the interim rules created in this decision, as the Commission complies with its statutory requirement to reduce the disconnection rate by 2024.

3.2. Limiting Disconnections of Vulnerable Customers

In addition to explicitly requiring an overall reduction in disconnection rates, SB 598 created protections for vulnerable customers for whom disconnection would be life-threatening. Specifically, SB 598 prohibits gas or

electrical corporations from disconnecting customers who utilize a medical baseline allowance, are financially unable to pay, agree to a payment plan, and either are under hospice care, on life-support equipment, diagnosed with a life-threatening condition that makes electricity service medically necessary.

In line with SB 598 protections, the Scoping Memo similarly proposed to ban disconnections of vulnerable customers, defined as customers who qualify for medical baseline and/or are above 65 years old, as long as the customer agrees to a payment plan. As noted in SB 598, customer disconnections are a public health issue, and impact the elderly, and people with physical disabilities, and with life-threatening medical conditions.

In filed comments, certain parties suggested changes to the definition of “vulnerable customers” for purposes of protections from disconnection. Suggested changes were offered mostly by UCAN and GRID. UCAN recommends that in addition to customers who qualify for medical baseline and/or are above 65 years old, the category of “vulnerable customers” also include members of a household under the age of 10, or those who do not qualify for medical baseline but can show proof of serious illness. GRID also requests to expand the definition of “vulnerable customers: to include: low income households, households with children, households of color, households where English is not the primary language spoken, physically disabled customers, and tribes.

SCE does not currently collect or track all of the data described by UCAN and GRID, and claims that gathering the information would require extensive effort, and be overly intrusive. SCE recommends that before early interventions or rapid relief is adopted, a consensus definition of “vulnerable customers” be determined in the Phase 1 workshop. SCE argues that some suggested

definitions such as “households with children” and “households of color,” are vague and could cause confusion and implementation problems.

PG&E supports the proposal to suspend disconnection of vulnerable customers if the customer agrees to a payment plan. PG&E’s customers with life-support equipment and receiving medical baseline allotments are currently afforded this benefit. PG&E would support extending this protection to those over age 65 who self-identify as vulnerable. PG&E already offers payment plans to all qualifying customers and has a process for customers to self-identify as being vulnerable. PG&E, however, requests more time to modify its current process to allow for self-identification by customers age 65 or older. On a going forward basis, PG&E suggests coordinating consistent policies among the IOUs through workshops and provision for time to implement adopted changes.

SDG&E and SoCalGas are generally amenable to the disconnection protections proposed for “vulnerable customers” in the Scoping Memo, but oppose expansions as to who should qualify. They argue that such changes are not appropriate because: (1) they do not maintain information to redefine the group, (2) acquiring the information would be intrusive and difficult, and (3) the category would encompass a substantial portion of customers, and potentially even a majority. They argue that if the proposed changes are to begin imminently, it would be impossible for them to be sufficiently tested, analyzed, or implemented.

Because SDG&E and SoCalGas do not generally request or maintain age data for all customers, they express concern over being directed to actively seek out age information from all customers. They argue that such efforts may prove difficult, seem overly intrusive, and invite certain customers to abuse the system.

They therefore request that the Commission clarify that there will be no affirmative duty on the utilities to ask customers their age.

Because some of the demographic data described by GRID and UCAN would be self-reported by customers, SCE agrees with SoCalGas/SDG&E that it may invite abuse. If additional data collection is necessary, SCE argues that more time and funding may be needed for system modifications. SCE requests that before the definition of “vulnerable customers” is expanded, it should be vetted in Workshop 1 so that unintended consequences can be avoided.

In comments on the proposed decision, CUE, GRID, PG&E, SCE, and CforAT and NCLC expressed support for the protections for vulnerable customers. PG&E expresses concern about its ability to disconnect vulnerable customers who fail to comply with the offered payment plan. SCE requests that the protections go into effect on January 7, 2019 to allow for time to train customer service representatives to request age information during final calls before disconnection. SDG&E and SoCalGas argue that their existing protections are as stringent as those in the proposed decision.

CforAT and NCLC recommends specific guidelines on the type of payment plan utilities must offer to those customers. CforAT and NCLC are concerned that customers will accept whatever payment plan is offered to them, even if they cannot afford the payment plan provided, in order to avoid disconnection in the near term. CforAT and NCLC propose that utilities be required to offer vulnerable customers payment plans spread over at least four months.

3.2.1. Discussion

For purposes of interim rules prohibiting disconnections of vulnerable customers, we shall adopt the following. The utilities shall not disconnect

customers for nonpayment who qualify for medical baseline and/or are above 65 years old, as long as the customer agrees to a payment plan offered by the utility. The utility is required to offer the vulnerable customer a payment plan with a duration of at least four months. Customers may select a payment plan of a shorter duration if they choose, but the utility must offer a payment plan of at least four months' duration to any vulnerable customer at risk of disconnection. For the purpose of applying this requirement, we define senior citizens as any permanent member of a household, age 65 or older, in any income bracket, consistent with the criteria in D.16-09-016.⁶ The utilities shall not disconnect a customer if anyone in the household meets that definition.

We shall not require the utility to make affirmative inquiry of every residential household as to whether eligible vulnerable customers reside there. If the utility has discussions with the customer over the telephone or in person with an employee of the utility prior to disconnection, the utility shall have a duty to inquire if there is anyone in the household who meets the age 65+ parameters for senior citizens as adopted herein.

In the event that an individual 65 or over fails to successfully complete a payment plan of at least four months' duration, the utility may proceed with disconnection assuming that none of the other interim prohibitions apply. However, we encourage the IOUs to try and work with the customer to ensure that adequate opportunities are provided for a customer 65 or over to resolve any payment delinquencies. For example, IOUs are encouraged to offer vulnerable customers payment plans that exceed the four-month minimum established in this decision.

⁶ See D. 16-09-016, Section 2.1.2, Finding of Fact 3, and Ordering Paragraph 1.

We decline to expand the alternative definitions of vulnerable customers such as that proposed by UCAN and GRID. Before considering adoption of such expanded definitions, further examination is warranted regarding the implications and the practicalities of implementation. In further stages of this proceeding, we may consider these proposals to redefine the definition of vulnerable customers in further detail.

The IOUs also indicated in their comments on the proposed decision that they would need additional time to implement changes to their systems to gather information concerning the age of a customer. We will allow the IOUs until close of business on December 21, 2018 to implement the changes regarding whether an individual 65 or older resides in the household.

3.3. Temperature-Related Limitations on Disconnections

The Scoping Memo proposed that energy IOUs not be allowed to disconnect customers when the 72-hour National Weather Service forecast predicts temperatures above 100 degrees or below 32 degrees. This proposed protection recognizes that disconnections are a public health issue, particularly when temperatures are extreme. Lost access to energy services on extremely hot or cold days can be life threatening for some populations, including infants, children, and the elderly. To protect customers from disconnection due to nonpayment during periods of extreme temperatures this winter, we establish thus immediate, interim temperature limitations on disconnections.

In filed comments, certain parties seek clarification and/or modifications to the Scoping Memo proposal regarding temperature limits on disconnections. Other parties, while generally supportive of the temperature limitations, suggested alternative approaches that differ from certain existing IOU disconnection policies. UCAN recommends that temperature protections ban

disconnections during weather conditions that are ten or more degrees above or below average for a period of in excess of three days. SDG&E and SoCalGas are open to exploring these limitations, but believe UCAN's proposal does not appear sufficiently developed at this time.

The IOUs generally support the temperature limitation concept, but note that their temperature-based limitations on disconnections differ somewhat from the approach described in the Scoping Memo. PG&E uses an internal comprehensive meteorological forecast for its service territory. Forecasts are updated daily and disconnects are suspended for all communities when the daily forecast predicts temperatures at or above 100 degrees, and at or below 32 degrees. PG&E proposes continued use of its current process rather than adoption of the National Weather Service forecast approach.

PG&E also claims that time would be required to make technological enhancements and new controls to apply its current daily forecast approach to a 72-hour window. PG&E argues that such changes would be best evaluated and addressed through workshops. PG&E thus requests permission to continue implementing its current severe temperature disconnection policy without change at this time.

SCE believes that the proposal to suspend disconnections during extreme weather should be delayed until after Phase 1 workshops. SCE requests the Commission include examination and analysis of this and other pilot proposals in the Workshop 1, where thorough discussion and vetting on the design and impacts of implementation can be conducted.

TURN argues that protections from disconnection for residential customers during extreme temperatures should be implemented as soon as possible. PG&E, SDG&E, and SoCalGas have already implemented protections

during extreme weather and support continuation of such protection. SCE is the only major IOU that has not yet implemented these protections for residential customers. The CforAT, NCLC, and the Public Advocates Office state that as many as half of the states in the United States already have policies on residential disconnections during periods of extreme temperatures.

The Public Advocates Office states that elimination of customer disconnections during weather events could result in higher arrearages for customers than those seen in a typical month. The Public Advocates Office believes there could be unintended consequences if the IOUs move away from current policies for temperature-based disconnections to the process described in the Scoping Memo. The Public Advocates Office recommends that the IOUs be allowed to use their current processes for the interim measures, and that subsequent workshops as necessary, can address ways to refine interim measures, as appropriate.

In comments on the proposed decision, CUE and CforAT and NCLC support the temperature protections. SCE states that it will change its existing policy to comply with the interim temperature protection, and PG&E and SDG&E and SoCalGas reiterated their request for a grace period for implementing the temperature protections.

3.3.1. Discussion

For purposes of the interim rules, we shall require that the energy IOUs cannot disconnect residential electricity customers when temperatures above 100 degrees⁷ or below 32 degrees are expected based on a 72-hour look-ahead period. This limitation draws on existing PG&E practice, which prevents

⁷ The limitation on disconnections above 100 degrees does not apply to gas providers

disconnection of utility customers when temperatures on a given day exceed 100 degrees or are below 32 degrees.

In their comments, the major IOUs argued that they would need more time to implement technological enhancements to comply with the proposed 72-hour weather forecast disconnection measure. We recognize that requiring the utilities to rely upon the National Weather Service model referenced in the Assigned Commissioner's Scoping Memo could require some additional implementation time to the extent that it differs from their existing temperature disconnection policy. Accordingly, to address this concern, we shall permit each utility to continue to use its own internal weather monitoring systems rather than the National Weather Service model. Additionally, we will allow the utilities until close of business on December 21, 2018, to implement the 72-hour look-ahead. By doing this, we address some of the IOUs' concerns regarding implementation lead time, while still providing protections before the weather becomes too extreme. We therefore will require the adopted interim rules calling for a 72-hour look-ahead period to take effect no later than close of business on December 21, 2018. This rule must be applied in assessing extreme weather conditions before disconnection occurs. The first workshop of 2019, and subsequent workshops as necessary, shall address ways to refine the interim measures, as appropriate, consistent with best practices.

4. Comments on Proposed Decision

The proposed decision in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed on November 16, 2018, by Department of Community Services and Development. Comments were also filed on

November 19, 2018 by Grid Alternatives, CforAt and NCLC, CUE, PG&E, PacifiCorp, SDG&E and SoCal Gas, SCE, BVES-Liberty CalPeco and Southwest Gas. Reply comments were filed by PG&E, TURN, SDG&E and SoCalGas, SCE, BVES-Liberty Calpeco, UCAN, CforAt and NCLC, and Grid Alternatives. As appropriate, we have addressed the relevant comments in this decision.

5. Assignment of Proceeding

Pursuant to Public Utilities Code Section 1701.4 and Rule 13.2

Commissioner Martha Guzman Aceves is the assigned Commissioner and the Presiding Officer. Gerald F. Kelly is the assigned Administrative Law Judge in this proceeding.

Findings of Fact

1. The Commission opened R.18-07-005 pursuant to SB 598, in order to address disconnection rates across California's electric and gas investor-owned utilities.
2. The Commission seeks to adopt policies and rules that reduce disconnections and improve reconnection processes and outcomes for disconnected customers.
3. As noted in SB 598, residential electric and gas disconnections are on the rise and create public health impacts, especially on vulnerable populations, causing tremendous hardship and undue stress, including increased health risks to vulnerable populations, as well as overreliance on emergency services and underutilization of preventive programs.
4. Rulemaking 18-07-005 calls for a comprehensive assessment of the root causes of (or events that correlate with) residential customer disconnections while also evaluating the rules, processes and procedures regarding disconnections and reconnections at both a statewide and utility specific level.

5. The assigned Commissioner's Ruling in R.18-07-005 laid out a plan to establish interim rules to provide quick relief to address the continuing increase in disconnection. The Assigned Commissioner's Scoping Memo and Ruling proposed to: (a) limit the rate of disconnections to the 2017 levels, (b) prohibit the disconnection of specifically defined categories of vulnerable customers and (c) prevent disconnections during certain seasonal events.

6. SB 598 mandated protections for vulnerable customers for whom disconnection would be life-threatening.

7. Lost access to energy services on extremely hot or cold days can be life threatening for some populations, including infants, children, and the elderly.

8. There shall be no memorandum account treatment of costs that may be incurred in connection with complying with this decision.

Conclusions of Law

1. The parties in this proceeding have had a reasonable opportunity to comment on the Assigned Commissioner's Scoping Memo, including the interim rules proposed therein, which form the basis for this decision.

2. Given the continuing rise in the rate of residential customer disconnections throughout the service territories of California-jurisdictional utilities, it is reasonable to take quick action to adopt the interim rules set forth below while the Commission considers longer-term solutions as outlined in the Assigned Commissioner's Scoping Memo.

3. Due to the unique circumstances confronting smaller utilities, It is reasonable to conduct a separate phase concerning interim rules for the smaller IOUs.

4. Recorded levels of disconnections by each of the California-jurisdictional energy utilities during 2017, as set forth in Appendix A, form an appropriate

basis to establish a goal of reducing disconnection levels pending further Commission action in this proceeding.

5. The interim rules adopted in this decision recognize the intent and directives set forth in SB 598, as described in Rulemaking 18-05-007.

6. In line with the provisions of SB 598, it is reasonable to impose restrictions prohibiting disconnections of vulnerable customers defined as customers who qualify for medical baseline, life support and/or are above 65 years old, as long as the customer agrees to a payment plan.

7. It is reasonable to require that utilities offer vulnerable customers a payment plan of at least four months' duration.

8. It is reasonable to prohibit the energy utilities covered by the interim rules adopted in this decision from disconnecting residential electricity customers when temperatures above 100 degrees or below 32 degrees are expected based on a 72-hour look-ahead period. For this purpose, it is reasonable to allow each utility to use its own existing in-house weather forecasting processes.

9. It is reasonable to prohibit gas utilities covered by the interim rules adopted in this decision from disconnecting gas service when the temperature falls below 32-degrees on a 72-hour look-ahead period.

10. The interim rules set forth below should be adopted and made effective no later than close of business on December 21, 2018.

11. The goal of limiting disconnections to 2017 levels shall be effective January 1, 2019 for all covered IOUs, with the exception of SDG&E, who will be granted a three-month grace period prior to implementing the goal.

O R D E R

1. The interim rules set forth below are hereby adopted in order to reduce residential customer disconnections and to improve reconnection processes. These interim measures shall become effective as set forth below.. The rules shall apply to the four large Investor Owned Utilities as follows: Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas and Electric Company, and Southern California Gas Company. Pursuant to these interim rules, each of these utilities shall comply as follows:

- (a) Effective January 1, 2019, each respective utility shall set a goal of limiting residential customer disconnections using the recorded 2017 percentage of each respective utility. Disconnections implemented for each subsequent year must remain below the interim annual disconnection goal. The utilities shall use an absolute number for the interim annual disconnection goal. To calculate the absolute number, the utilities shall apply the 2017 disconnection percentages to their residential populations when this decision goes into effect. The recorded 2017 disconnection percentages to be used are set forth in Appendix A of this decision. No later than 5 business days from the mailing of this order, the utilities shall file their goal as calculated with their current residential customer population. The adopted disconnection rate goal shall remain in effect for the duration of Phase 1 of this proceeding or until annual targets for reduced residential disconnections have been adopted to ensure no further increases. The calculated goals shall be filed by a Tier 1 Advice Letter. SDG&E shall be granted a three month grace period for the goal.
- (b) Effective no later than close of business December 21, 2018, residential customers shall not be disconnected for nonpayment if they qualify for medical baseline and/or are above 65 years old, as long as the customer agrees to a payment plan. The Respondent Utility must offer a payment plan of at least four months' duration to the customer; the

customer is free to select a shorter payment plan period, but must be offered a payment plan of at least four months' duration by the Respondent Utility. For the purpose this requirement, senior citizens are defined as any permanent member of a household, age 65 or older, in any income bracket, consistent with Decision 16-09-016 criteria for purposes of applying Public Utilities Code Section 745. If anyone in a household meets that definition, the household's service may not be disconnected. The Respondent Utility is not required to make affirmative inquiry of every residential household as to whether eligible vulnerable customers reside there. If the Respondent Utility has discussions with a residential customer prior to disconnection, however, that Utility shall have a duty to inquire if anyone in that household meets the age 65+ parameters for senior citizens adopted herein.

- (c) Residential customers shall not be disconnected when temperatures above 100 degrees or below 32 degrees are forecasted based on a 72-hour look-ahead period. Each utility may continue to use its own internal weather monitoring systems for meeting this requirement.

2. Liberty Utilities, Southwest Gas Company, Bear Valley Electric Service, a division of Golden State Water Company, PacifiCorp, Alpine Natural Gas Operating Company, and West Coast Gas Company, Inc. will be included into a separate phase of this proceeding designed to establish similar interim rules at a later time in this proceeding.

- 3. If any of the large IOUs exceed the annual disconnections goal, within 60 days of exceeding the goal that IOU must file and serve a report with the Commission explaining:
 - a. why the utility is exceeding the goal,
 - b. what steps were taken by the utility to manage disconnections to remain below the goal, and

- c. why those steps were insufficient in limiting disconnections to the established goal.
4. The request for a memorandum account to recover the incremental costs associated with complying with these adopted interim rules is denied.
5. If any of the rules adopted herein require changes to a utility's tariff, that utility shall promptly file an advice letter to implement such changes within 30 days of this decision. Provided that the changes are of a ministerial nature, a Tier 1 advice letter filing is acceptable for this purpose.
6. All respondents are directed to file monthly reports of specific disconnection data as specified in Appendix B, or in a form otherwise approved by the Energy Division. The first monthly report shall be filed on the 20th of the month following the mailing of this order and further reports filed the 20th of each month (or the next business day) thereafter until the interim protections have ended or further direction is provided.
7. Rulemaking 18-05-007 shall remain open for subsequent proceedings pursuant to the Assigned Commissioner's Scoping Memo.

This order is effective today.

Dated December 13, 2018, at San Francisco, California.

MICHAEL PICKER
President
CARLA J. PETERMAN
LIANE M. RANDOLPH
MARTHA GUZMAN ACEVES
CLIFFORD RECHTSCHAFFEN
Commissioners

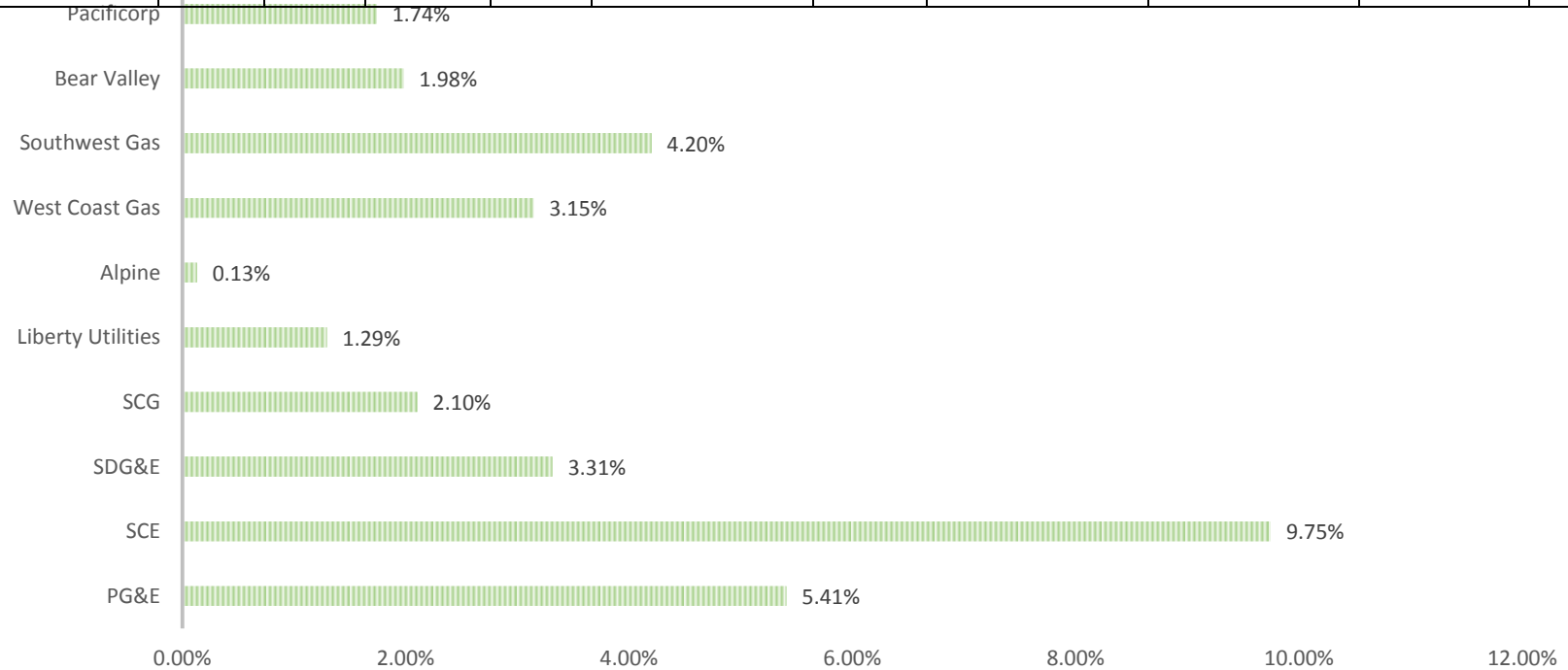
APPENDIX A – Disconnection Data

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APPENDIX B – Reporting

ATTACHMENT A

Disconnection rate											
2017		PG&E	SCE	SDG&E	SCG	Liberty Utilities	Alpine	West Coast Gas	Southwest Gas	Bear Valley	Pacificorp
Total		5.41%	9.75%	3.31%	2.10%	1.29%	0.13%	3.15%	4.20%	1.98%	1.74%



ATTACHMENT B
Reporting

Quarterly reporting on disconnections and arrearages

Each monthly report after the first should include prior months data until the
end of the calendar year.

Section 1 - Payment arrangements and bill assistance

Number of customers requesting bill assistance					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Number of customers with ongoing payment plans					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Number of customers receiving payment extension of <30 days					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Number of customers with 3 month payment arrangements					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Number of customers with 3 month+ payment arrangements					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Month	Number of customers who were connected with outside bill payment assistance from organizations (IOU/Local Service Provider)	Number of customers who received outside bill payment assistance from organizations (IOU/Local Service Provider)

*Please break this amount down by customer group if the information is available.

Section 2 - Broken payment arrangements

Number of customers with late or broken 3 month payment arrangements					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Number of customers with late or broken 3 month+ payment arrangements					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Section 3 – Arrearages

Number of customers in arrears					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Number of customers 31-60 days in arrears					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Number of customers 61-90 days in arrears					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Number of customers 91-120 days in arrears					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Number of customers 121+ days in arrears					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Number of accounts paid 100% within 30 days from statement date					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Number of accounts paid 50-99% within 30 days from statement date					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Number of accounts paid <50% within 30 days from statement date					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Total Dollar amount of Residential Accounts in Arrears - Month

Number of Days	All Balances	% of total outstanding
31-60 days		
61-90 days		
91-120 days		
121-150 days		
151-179 days		
180+ days		
Total outstanding receivables		

Total Dollar amount of non-CARE/FERA accounts in Arrears - Month

Number of Days	All Balances	% of total outstanding
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31-60 days		
61-90 days		
91-120 days		
121-150 days		
151-179 days		
180+ days		
Total outstanding receivables		

Total Dollar amount of CARE accounts in Arrears – Month

Number of Days	All Balances	% of total outstanding
31-60 days		
61-90 days		
91-120 days		
121-150 days		
151-179 days		
180+ days		
Total outstanding receivables		

Total Dollar amount of FERA accounts in Arrears – Month

Number of Days	All Balances	% of total outstanding
31-60 days		
61-90 days		
91-120 days		
121-150 days		
151-179 days		
180+ days		
Total outstanding receivables		

Total Dollar amount of Medical Baseline accounts in Arrears – Month

Number of Days	All Balances	% of total outstanding
31-60 days		
61-90 days		
91-120 days		
121-150 days		
151-179 days		
180+ days		
Total outstanding receivables		

Total Dollar amount of Residential accounts in Arrears by amount owed – Month

Amount owed	All Balances	% of total outstanding
<\$500		
\$1000 - \$500		
\$2000-1000		
>\$2000		
Total outstanding receivables		

Total Dollar amount of non-CARE/FERA accounts in arrears by amount owed – Month

Amount owed	All Balances	% of total outstanding
<\$500		
\$1000 - \$500		
\$2000-1000		
>\$2000		
Total outstanding receivables		

Total Dollar amount of CARE accounts in arrears by amount owed – Month

Amount owed	All Balances	% of total outstanding
<\$500		
\$1000 - \$500		
\$2000-1000		
>\$2000		
Total outstanding receivables		

Total Dollar amount of FERA accounts in arrears by amount owed – Month

Amount owed	All Balances	% of total outstanding
<\$500		
\$1000 - \$500		
\$2000-1000		
>\$2000		
Total outstanding receivables		

Total Dollar amount of Medical Baseline accounts in arrears by amount owed – Month

Amount owed	All Balances	% of total outstanding
<\$500		
\$1000 - \$500		

\$2000-1000		
>\$2000		
Total outstanding receivables		

Total number of accounts in arrears by amount owed – Month

Amount owed	Non CARE/FERA	CARE	FERA	Medical Baseline	Total
<\$200					
\$500-\$200					
\$1000-\$500					
\$2000-1000					
>\$2000					

Section 4 – Disconnection/termination

Number of customers experiencing disconnection for non-payment					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Out of those disconnected in the month please show those for whom it is their 2 nd or more disconnection that year					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Number of customers reconnected within 24 hours					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Number of customers reconnected within 24-48 hours					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Number of customers reconnected within 48-72 hours					
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Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Number of customers reconnected within 72+ hours					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Section 5 – Security Deposits

Number of customers with security deposits					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Section 6 – Notices

Number of customers who received an initial disconnection notice (15 day or similar)					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Number of customers who received a secondary disconnection notice (48 hour or similar)					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Section 7 – Basic information

Number of active customer accounts in IOU territory					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

Number of customers involuntarily returned to utility service from CCA					
Month	Non CARE/FERA	CARE	FERA	Medical Baseline	Total

*Please list this information by CCA if possible.

- A list of zip codes within the IOU territory by disconnection rate for that month, descending, Excel format
- A list of zip codes within the IOU territory by total number of disconnections for that month, descending, Excel format (if providing this information would violate customer confidentiality, please blank the affected zip codes for submission to the service list and provide the confidential version to Energy Division)

Section 8 – Interim measures information

- **Please include the calculation for the annual disconnection goal.**
- **Please list any instances in the last quarter in which your utility has invoked temperature related limits on disconnections.**
- **Please list the average amount owed of customers who were disconnected in the previous month.**

(End of Attachment B)