

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION

Agenda ID: 18989  
RESOLUTION E-5114  
December 17, 2020

R E S O L U T I O N

Resolution E-5114. Approval of Arrearage Management Plans for Large Investor-Owned Electric and Gas Utilities

PROPOSED OUTCOME:

- Approves with modifications Arrearage Management Plans proposed pursuant to D.20-06-003 in Tier 2 Advice Letters
- Approves cost recovery through the Public Purpose Program Charge from all customers.
- Approves paying remittances to Community Choice Aggregators with customers enrolled in Arrearage Management Plans for costs of forgiving generation-related arrearages associated with those unbundled customers.

SAFETY CONSIDERATIONS:

- There are no direct safety considerations associated with this resolution. The approved Arrearage Management Plans could result in forgiven arrearages for participants which in turn could potentially reduce disconnection of utility service for such participants. Disconnection of gas or electric service can lead to unsafe conditions.

ESTIMATED COST:

- This resolution is expected to result in costs to ratepayers ranging from hundreds of thousands to the low millions of dollars per utility, primarily due to the cost of forgiven customer arrearages. Costs may be substantially lower than forecasted, particularly in 2021.<sup>1</sup>

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<sup>1</sup> The uncertainty of cost impacts is due to the difficulty in forecasting the number of customers who will receive arrearage forgiveness and the magnitude of arrearages owed by those customers.

- Additional utility staffing and Information Technology (IT) costs associated with implementation of Arrearage Management Plans are also anticipated. These are expected to be significant initially during manual implementation of the programs and then decline as enrollment and tracking processes are automated.

By Advice Letters:

PG&E 4308-G/5943-E, Filed on September 9, 2020.

SCE 4287-E, Filed on September 9, 2020.

SDG&E 2902-G/3602-E, Filed on September 9, 2020.

SoCalGas 5689-G, Filed on September 9, 2020.

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## **SUMMARY**

This Resolution approves with modifications the Arrearage Management Plan (AMP) proposals submitted by Pacific Gas & Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SoCalGas), collectively "IOUs," pursuant to Decision (D.)20-06-003, which required submission of Tier 2 Advice Letters (ALs) detailing plans to establish AMP programs.

The arrearages are billed amounts for electric or gas service that customers owe to an IOU but have not paid. When customers are in arrears to their IOU, at some point the IOU may disconnect service due to the arrearage. Disconnection from electric or gas service may create unsafe conditions for customers, and reducing the number of customers in arrears and the amount of arrearages owed is anticipated to reduce the number of customers who could be disconnected for nonpayment.

The AMP program approved by this resolution essentially forgives past due arrearages for participants in the program. Per this resolution, the IOUs are authorized to record costs associated with the uncollected, forgiven arrearages in a two-way balancing account and to recover the balance through the Public Purpose Program (PPP) Charge during an annual true-up process. In other

words, unpaid arrearages that have been forgiven in accordance with AMP will be recovered from all classes of customers that currently pay the PPP Charge.

In addition, IOUs are also authorized to track arrearages of unbundled customers who enroll in AMP and receive arrearage forgiveness. IOUs shall track the amount of arrearages owed by these customers to Community Choice Aggregators (CCAs) that are forgiven through AMP in the same balancing account used to track and recover the cost of all arrearages forgiven through AMP and shall make remittance payments to each CCA with customers enrolled in AMP to compensate CCAs for the cost of forgiven arrearages owed to the CCA by unbundled customers.

## **BACKGROUND**

In 2018, the CPUC opened Rulemaking (R.)18-05-007 to examine new approaches to disconnections for nonpayment. Disconnecting customers' electric or gas service can create unsafe conditions for customers who depend on electric or gas service to meet basic needs such as heating, cooking, and light. 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 the lack of electric and gas service. The CPUC opened the rulemaking following legislative direction in Senate Bill 598 (Hueso, 2017) for the CPUC to enact new policies to reduce the level of disconnections by IOUs statewide.

Decision (D).20-06-003 adopted the AMP program to assist low-income IOU customers with unpaid electric and gas utility bills. The program provides customers an opportunity to receive forgiveness for past-due arrearages in return for on-time payment of current monthly bills. Customers enrolled in AMP will receive forgiveness of 1/12 of their starting arrearage balance for every on-time payment of a current monthly bill, with a maximum possible amount of \$8,000 in total forgiveness per 12-month period. Only customers enrolled in either the California Affordable Rates for Energy (CARE) or Family Electric Rate Assistance (FERA) programs are eligible for AMP, and customers must also owe at least \$500 in arrearages, or \$250 for gas-only customers, with some portion of the arrearage at least 90 days past due.

Customers enrolled in AMP who fail to make a current on-time monthly bill payment in two sequential months or three non-sequential months shall be removed from participation, but they will retain any arrearage forgiveness received through AMP prior to their removal from the program. Customers removed from the program involuntarily, through failure to remain current on monthly bills, or after completing 12 months of on-time monthly bill payments may re-enroll after a 12-month waiting period provided that they still meet the eligibility criteria at the time of re-enrollment.

Ordering Paragraph (OP) 83 of Decision (D.) 20-06-003 directed the IOUs to submit Tier 2 Advice Letters (ALs) within 90 days of its effective date to implement AMP programs for their customers. D.20-06-003 also established the AMP Working Group, co-led by the IOUs, the California Community Choice Association (CalCCA), and The Utility Reform Network (TURN), and OP 87 of D.20-06-003 tasked the AMP Working Group with evaluating potential options for cost recovery that would resolve concerns over potentially disproportionate costs allocated to certain CCAs resulting from arrearage forgiveness before IOUs would submit their Tier 2 ALs implementing AMP.

The AMP Working Group met four times in advance of the IOUs' submission of their ALs to discuss details of the program including options for cost recovery. At the last AMP Working Group meeting on August 28, 2020, each IOU proposed to track and recover costs for both unbundled and bundled customers through the existing PPP Charge. On September 9, 2020, the IOUs filed the above ALs, reflecting the input of the Working Group by proposing to recover costs of forgiven arrearages for both bundled and unbundled customers using the PPP Charge and subsequently remit to participating CCAs the amount of forgiven arrearages owed to each CCA.

All the IOUs proposed AMP programs in their Tier 2 ALs consistent with the eligibility and operational requirements established by D.20-06-003. Eligible customers must meet the following criteria: (1) be enrolled in either California Alternate Rates for Energy (CARE) or Family Electric Rate Assistance (FERA) for bill assistance, (2) have made at least one on-time bill payment within the previous 24 months, and (3) have at least \$500 in past-due arrearages (or \$250 for

gas-only customers), some portion of which is at least 90 days old. Customers who enroll in AMP are subject to the following provisions and conditions:

- Customers are entitled to arrearage forgiveness equal to 1/12 of their beginning arrearage balance for every on-time payment of a current monthly bill up to a maximum total amount of \$8,000 over 12 months of payments.
- Customers who miss two consecutive monthly payments or three non-consecutive monthly payments will be removed from the program but will not forfeit forgiven amounts associated with on-time bill payments.
- Customers who exit the program either for non-payment or successful completion of all 12 monthly payments may re-enroll after a 12-month waiting period.
- Customers who receive unbundled electric service from a CCA are eligible for participation in AMP, but may only receive forgiveness for the portion of their arrearage owed to the IOU, unless the customer's CCA voluntarily participates in the program to forgive generation-related costs. IOU customers that receive generation from a CCA still pay the IOU for transmission and distribution costs, and the AMP covers costs attributable to these IOU services.
- Customers who receive gas service through a Core Transport Agent (CTA) may participate in AMP only for arrearages owed to the IOU for distribution-related costs if the IOU is the billing agent for those costs.
- Customers participating in Net Energy Metering (NEM) are not eligible for participation at this time. Parties discussed options for allowing NEM customers to enroll in AMP during the AMP Working Group meetings, but agreed that more discussion would be necessary before establishing a framework for NEM customers to enroll in AMP given differences in billing practices between the IOUs.

All IOUs propose in their ALs to recover costs for forgiven arrearages through the PPP Charge. At the four AMP Working Group meetings, IOUs and stakeholders discussed options for ensuring adequate cost recovery and proportional allocation of costs for unbundled customers shared by IOUs and CCAs. At the fourth and final AMP Working Group meeting on August 28, 2020, parties agreed the most reasonable option to ensure adequate cost recovery was for IOUs to jointly recover both IOU and CCA costs for forgiven arrearages through the PPP Charge and to subsequently remit to CCAs the amount of recovered costs attributable to generation-related CCA costs. This option was preferred by stakeholders out of concern that alternative options, such as requiring CCAs to track and recover costs from their own customers directly, would be overly burdensome to implement, disproportionately costly to small CCAs, and could deter CCA participation in AMP.

The IOUs propose to record the cost of forgiven debt in each utility's Residential Uncollectibles Balancing Account (RUBA). This residential balance will be transferred to the PPP adjustment mechanism during the annual true-up process before being recovered from all customers. In addition, the IOUs will also recover costs associated with generation-related forgiven debt for unbundled customers and will provide remittance payments to relevant CCAs to compensate each participating CCA for the cost of forgiving generation-related debt under AMP.

The IOUs propose to track and recover implementation related costs for AMP, such as staff workload and IT costs, using memorandum accounts authorized by D.20-06-003.

## **NOTICE**

Notice of AL 4308-G/5943-E was made by publication in the Commission's Daily Calendar. PG&E states that a copy of the AL was mailed and distributed in accordance with Section 4 of General Order 96-B. Notice of AL 4287-E was made by publication in the Commission's Daily Calendar. SCE states that a copy of the AL was mailed and distributed in accordance with Section 4 of General Order 96-B. Notice of AL 3602-E/2902-G was made by publication in the Commission's Daily Calendar. SDG&E states that a copy of the AL was mailed and distributed

in accordance with Section 4 of General Order 96-B. Notice of AL 5689-G was made by publication in the Commission's Daily Calendar. SoCalGas states that a copy of the AL was mailed and distributed in accordance with Section 4 of General Order 96-B.

## **PROTESTS**

### *CalCCA protest of PG&E AL 4308-G/5943-E*

PG&E's AL 4308-G/5943-E was timely protested by the California Community Choice Association (CalCCA). CalCCA argues that PG&E's AL 4308-G/5943-E proposal that third party cost recovery be addressed during a later phase of this proceeding renders it noncompliant with OP 87 of D.20-06-003. Specifically CalCCA asserts that OP 87 required the IOUs to propose a mechanism in their Tier 2 Advice Letters for proportional allocation of recovered AMP costs between CCAs and IOUs following discussion within the AMP Working Group.<sup>2</sup>

CalCCA also objected to PG&E's proposal that prior to Commission approval of the cost recovery mechanism, individual CCAs be required to track and recover costs of unbundled customer generation-related arrearages forgiven under AMP. The CCAs argue that this proposal could force CCAs with high AMP participation to recover AMP costs from only their own customers and increase rates significantly. CalCCA requests clarification of when PG&E intends to receive notification from participating CCAs of their intent to participate, as CCA participation in AMP is voluntary.

CalCCA also argues that PG&E has not explained what customer information it will share with participating CCAs to track the status, and associated costs, of unbundled customers enrolled in AMP. This information includes the number of customers eligible for AMP, account numbers of customers enrolled in AMP, and account numbers for customers who have missed one payment, and the frequency with which PG&E will report such information to CCAs. CalCCA indicated its members would require additional information, such as the starting arrearage balance of customers participating in AMP and the dollar amount of

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<sup>2</sup> CalCCA Protest to PG&E AMP Advice Letter in response to Decision 20-06-003, in AL 4308-G/5943-E, dated September 29, 2020

arrears forgiveness already processed, to implement PG&E's proposal for individual CCAs to track and recover costs from their own customers, if AMP were implemented prior to receiving explicit Commission approval.

In response to CalCCA's protest, PG&E argues AL 4308-G/5943-E is compliant with OP 87 because it addresses cost recovery for arrearages forgiven in PG&E's territory. PG&E proposes that individual CCAs track and recover unbundled customer forgiven arrearages, if AMP enrollment began prior to Commission authorization of its proposal for cost recovery. PG&E requests that CCAs notify PG&E of their voluntary participation within 45 days of submission of AL 4308-G/5943-E (October 26, 2020) because PG&E needs sufficient time to allocate resources for participating CCA customers. To CalCCA's request for more frequent sharing of customer information to track the status and costs associated with unbundled customers enrolled in AMP, PG&E responds that it will work directly with CCAs to address concerns over frequency of information sharing for unbundled customers. PG&E states that the information sharing described in AL 4308-G/5943-E is sufficient for tracking and recovering unbundled customer costs from participating in AMP.

*CalCCA protest of ALs SCE 4287-E and SDG&E 2902-G/3602-E*

SCE's AL 4287-E and SDG&E's AL 2902-G/3602-E were timely protested by CalCCA, which requested that SCE and SDG&E clarify how frequently remittances recovered for generation-related arrears would be rendered to CCAs. CalCCA also requested that SCE and SDG&E be required to share specific customer information with CCAs at least weekly and objected to SDG&E's proposal to share customer information through the regular data request process. Finally, CalCCA requested that SCE clarify whether its proposal that CCAs notify it of intent to participate within 45 days of AL 4287-E refers to submission or approval.

SCE responded to CalCCA's protest and indicated that costs for forgiven arrearages under AMP would only be recovered in the subsequent year after the customer has received forgiveness in an annual true up process. SCE also advised that Customer Service Re-Platform implementation would force the company to implement AMP manually first, and SCE's existing billing system



will treat arrearages forgiven due to on-time bill payment as a customer payment. This will allow SCE to remit payments for generation-related forgiven costs within a week of a customer's on-time payment. Accordingly, SCE will remit payments to CCAs under the manual system for many months before seeking cost recovery through the PPP Charge.

Regarding frequency with which unbundled customer information would be shared with CCAs, SCE argues that monthly sharing of information is sufficient since payments will be made monthly and the number of participating customers for any given CCA is likely to be small. Finally, SCE clarified it is requesting that participating CCAs notify SCE of their intent to participate within 45 days of AL 4287-E's submittal (October 24, 2020) to ensure SCE has sufficient time to prepare for managing the cases of unbundled customers participating in AMP. SCE specifically indicated that allowing CCAs to notify SCE of their intent to participate 45 days *after* Commission approval of AL 4287-E could occur on the same day that AMP enrollments begin.

SDG&E responded to the protest of CalCCA and clarified that its proposed mechanism for cost recovery would result in monthly remittances to CCAs as costs are incorporated into rates through the PPP charge and collected from customers monthly.<sup>3</sup> SDG&E indicated that remitting payments on a more frequent basis than monthly would be unworkable and unnecessary to ensure cost recovery, and that it would share unbundled customer information with participating CCAs on an ongoing monthly basis since customers are billed monthly. SDG&E further indicated sharing information more frequently during replacement of its Customer Information System would be overly burdensome because the reports would be created manually during the system replacement. SDG&E pledged to continue working with CCAs in its territory to meet additional needs for information sharing should such need arise.

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<sup>3</sup> CalCCA Protest to Southern California Edison's and San Diego Gas and Electric's AMP Advice Letters in response to Decision 20-06-003, dated September 29, 2020.

## **DISCUSSION**

The CPUC has reviewed the ALs and the protests and has determined that they are compliant with the AMP program implementation directives and eligibility and operational criteria set forth in D.20-06-003. The IOU cost recovery proposals are discussed here and approved with noted clarifications.

Pursuant to OP 87 of D.20-06-003, the AMP Working Group met four times to discuss proposals for appropriate cost recovery, which were submitted for socialized cost recovery via the PPP charge. The Working Group determined that the framework of recovering IOU and CCA costs jointly through the PPP charge, with CCA costs remitted by IOUs after cost recovery, was reasonable. Under this framework, IOUs will record all arrearages forgiven under AMP within the RUBA. During the annual true-up process, each IOU will adjust its PPP charge to recover these costs from all customers. Subsequently, IOUs will remit revenue equal to the recovered costs of generation-related arrears for each participating CCA in its territory on a monthly basis.

In AL 4308-G/5943-E, PG&E requested that the Commission provide guidance on the customer classes from which to seek recovery for AMP costs. PG&E noted that CARE costs are recovered from all customers, while FERA costs have historically been allocated only to residential customers. Resolving this issue requires a policy determination by the CPUC as to whether to allocate costs only to the residential customer class, or to all customer classes. Allocating these costs to only residential customers could increase the number of disconnected residential customers by increasing bills for those customers by a greater incremental quantity than if the costs were allocated across all customer classes. In addition, spreading these costs over all customer classes is consistent with the historic approach to recovering uncollectible arrearages through the PPP Charge.<sup>4</sup> Moreover, since it is the intent of this proceeding and the AMP programs specifically to reduce disconnections of residential customers and manage arrearages, it makes sense to recover AMP costs from all customer classes through the PPP Charge as well. Therefore, the CPUC finds that it is reasonable to recover the cost of forgiven AMP debt from all customers.

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<sup>4</sup> Traditionally, utility arrearages are written off as uncollectible, evaluated in General Rate Cases, and recovered from all customer classes through the PPP Charge.

CalCCA protested PG&E's proposal to require participating CCAs to track and recover costs of unbundled customer generation-related arrearages before the Commission has formally approved cost recovery via the PPP charge. PG&E responded that its proposal only requires CCAs to track and recover costs of forgiving arrearages owed to the CCA, not costs of arrearages owed to IOUs. Furthermore, PG&E noted that this proposal is only intended to apply to AMP costs incurred prior to CPUC approval of the proposal for joint cost recovery through the PPP charge and subsequent remittance payments to participating CCAs. PG&E additionally indicated its proposal to address its joint cost recovery proposal during a subsequent ratesetting phase of this proceeding reflects its intent to enable unbundled customers to participate in AMP as soon as feasible.

We reject CalCCA's arguments and approve PG&E's proposal to recover costs using the PPP charge and remit the portion of arrearages attributable to CCA costs to the relevant CCA. We find this reasonable because CalCCA's own protest endorsed PG&E's proposed solution to recover costs using the PPP charge and remit the portion of arrearages attributable to CCA costs to the relevant CCA. CalCCA's protest indicated that its objection was only applicable to PG&E's proposed alternative intended to take effect in the absence of CPUC approval of the proposal for joint cost recovery using the PPP charge. Since this resolution provides that approval, CalCCA's objections are moot.

CalCCA requested clarification of when PG&E intended to receive notification from participating CCAs of their intent to participate. Like SCE, PG&E indicated that a CCA seeking to participate should notify PG&E within 45 days of submittal of AL 4308-G/5943-E (October 26, 2020) to provide sufficient time for PG&E to allocate resources and make preparations to track costs and billing information for unbundled customers participating in AMP. However, SDG&E and SCE did not directly address the timeline for a CCA notifying its local IOU that it intends to participate in the AMP program. To date, a number of CCAs have conveyed publicly via the service list in this proceeding that they intend to participate in AMP, meeting PG&E and SCE's requested timing for advance notification.<sup>5</sup> However, setting a one-time deadline for advance notification when new CCAs are continually being formed or when existing CCAs were not

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<sup>5</sup> These CCAs include the California Choice Energy Authority, Western Community Energy, and the Clean Power Alliance of Southern California.

in a position to rapidly meet the IOUs' requested deadlines is needlessly arbitrary. It is reasonable for IOUs to request advance notification to prepare for other CCAs that decide to participate in AMP. We direct the IOUs to meet a 60-day timeline following notification from other CCAs that it intends to participate in AMP in the future. Since the IOUs only requested 45 days of advance notification for the first CCAs that would participate in AMP, 60 days of advance warning in the future should be enough to accommodate other CCAs once the program is already operating.

CalCCA requested clarification from PG&E regarding the type and frequency of information it intended to share with CCAs. This issue was also raised in CalCCA's protest of SCE AL 4287-E and SDG&E's AL 3602-E/2902-G, in which CalCCA requested that information be shared at least weekly with CCAs. PG&E, SCE, and SDG&E all indicated they would continue working with CCAs in their territories to deliver any information needed to track unbundled customers participating in AMP. However, providing reports weekly or even more frequently would be unnecessarily labor-intensive, especially during the manual phase of implementation, since customers are billed monthly and would only experience a change in program status or arrearage amount on the same basis. At this time, we conclude that monthly reporting of the requested information should be sufficient for tracking and recording costs associated with unbundled customers participating in AMP, which all IOUs have indicated is workable.

CalCCA protested SCE's AL 4287-E and SDG&E's AL 3602-E/2902-G requesting clarification of how frequently each IOU intended to remit payments of costs associated with unbundled customers participating in AMP that IOUs have recovered on behalf of participating CCAs. SCE and SDG&E both replied by indicating that cost recovery would be sought through an annual true-up process that would adjust monthly rates, meaning that cost recovery would begin in the subsequent year after AMP has begun, and payments would be remitted on a monthly basis as customer bills containing the adjusted PPP charge are paid to the IOU. The Commission finds that this is a reasonable remittance schedule for IOUs to provide recovered costs to participating CCAs and directs PG&E to follow the same remittance schedule to ensure consistency across IOUs.

PG&E, SCE, and SDG&E requested that customers participating in Net Energy Metering (NEM) be excluded from participation in AMP during initial implementation due to the complexity of resolving differences between the way AMP would function for most customers compared to NEM customers. We agree that integrating NEM customers in an AMP framework will require more discussion, so we will prohibit them from participating in AMP at this time.

PG&E and SoCalGas both requested that customers receiving gas service from Core Transport Agents or receiving Core Aggregation Transportation service only be eligible for arrearage forgiveness under AMP for transportation costs owed to the IOU, rather than being eligible for forgiveness for arrearages owed to the third party. The Commission finds that this is a reasonable solution to the issue of third party gas costs because the issue of costs owed to Core Transport Agents was not addressed in D.20-06-003. We direct that costs for gas service owed to third parties other than the IOUs are not eligible at this time for arrearage forgiveness under AMP. While SDG&E did not directly address the issue in its AL 2902-G/3602-E, SDG&E indicated at the fourth AMP Working Group meeting on August 28, 2020 that it does not bill for third parties providing Core Aggregation Transportation service and therefore is not authorized or able to waive past-due charges on behalf of these providers. It is therefore reasonable to exclude gas arrearages of CTA-served customers from SDG&E's AMP program as SDG&E is not in a position to administer the program.

The IOUs should begin enrolling customers 30 days after the effective date of this resolution. In a letter dated August 13, 2020, the Energy Division Director indicated to the IOUs "An expeditious implementation of this program is a critical facet of the CPUC's on-going effort to reduce disconnections among residential customers," and conveyed that IOUs should be prepared to implement AMP plans by the end of 2020. Accordingly, all four IOUs proposed to implement their AMP programs the later of 90 days from the date of the letter (November 11, 2020) or 45 days following the Commission's approval of the utility's AL. It is reasonable for the IOUs to request preparation time after AMP program proposals have been approved. Therefore, in order to ensure customers may begin obtaining the benefits of arrearage forgiveness as quickly as is feasible, we direct the IOUs to begin enrolling customers 30 days after the effective date of this resolution.

## **COMMENTS**

Public Utilities Code section 311(g)(1) provides that this resolution must be served on all parties and subject to at least 30 days public review. Please note that comments are due 20 days from the mailing date of this resolution. Section 311(g)(2) provides that this 30-day review period and 20-day comment period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day review and 20-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments, and will be placed on the Commission's agenda no earlier than 30 days from today.

## **FINDINGS**

1. Decision (D.)20-06-003 directed Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas and Electric Company (SDG&E), and Southern California Gas Company (SoCalGas) to file Tier 2 ALs to implement Arrearage Management Plans (AMPs).
2. PG&E, SCE, SDG&E, and SoCalGas (collectively, the IOUs) filed Tier 2 ALs on September 9, 2020 proposing to implement Arrearage Management Plan (AMP) programs that comply with the eligibility and operational requirements of D 20-06-003.
3. D.20-06-003 ordered the IOUs to propose a method for cost recovery in ALs addressing the proportional recovery concerns raised by California Community Choice Association (CalCCA) in the Arrearage Management Working Group.
4. The IOUs proposed in their ALs to recover costs for arrearages forgiven through an AMP plan using the existing Public Purpose Program (PPP) Charge, which would be adjusted annually and recovered from all customers.
5. It is reasonable for the IOUs to request that any Community Choice Aggregator (CCA) seeking to allow its customers to participate in AMP programs notify the utility 60 days in advance of the CCA's customers being eligible to enroll in an AMP program.
6. It is reasonable for the IOUs to provide unbundled customer information for those participating in AMP programs to the customer's CCA on a monthly

basis and attempt to meet additional requests from participating CCAs to share information that are necessary to track and recover costs for unbundled customers participating in AMP programs.

7. It is reasonable for the IOUs to provide remittances for generation-related costs for unbundled customers receiving arrearage forgiveness to participating CCAs on a monthly basis once the PPP charge has been adjusted to recover these costs from customers.
8. Customers receiving Net Energy Metering are not eligible for arrearage forgiveness under AMP programs until issues related to their participation can be discussed in greater detail.
9. It is reasonable that charges owed to third party gas providers, such as Core Transport Agents, for service such as Core Aggregation Transportation will not be eligible for forgiveness of costs other than transportation-related gas costs owed to PG&E and SCG.
10. It is reasonable to exclude Core Aggregation Transportation customers in SDG&E territory because SDG&E does not bill on behalf of third-party gas providers and therefore does not have arrearages from customers of these companies to forgive.

**THEREFORE IT IS ORDERED THAT:**

1. The requests of Pacific Gas & Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SoCalGas) to implement Arrearage Management Plan (AMP) programs as requested in PG&E AL 4308-G/5943-E, SCE AL 4287-E AL SDG&E 3602-E/2902-G, and SoCalGas 5689-G are approved as clarified in this resolution.
2. PG&E, SCE, SDG&E, and SoCalGas are authorized to include costs for forgiven arrearages through AMP plans in their annual adjustments of their Public Purpose Program (PPP) charge and recover those costs from all customers accordingly.
3. PG&E, SCE, SDG&E, and SoCalGas are authorized to provide monthly remittance payments to any Community Choice Aggregator (CCA) that has elected to participate in a utility's Arrearage Management Plan program equal to forgiven customer arrearages associated with generation-related costs

borne by the Community Choice aggregator and recovered through the Public Purpose Program charge.

4. PG&E, SCE, SDG&E, and SoCalGas shall request 60 days of advance notification from any Community Choice Aggregator in the utility's service territory seeking to participate in the AMP program after each utility has begun enrolling customers in AMP plans.
5. PG&E, SCE, SDG&E, and SoCalGas shall provide information on unbundled customers participating in AMP plans to the customer's CCA at least monthly that is necessary to track and recover costs for unbundled customers participating in AMP programs.
6. After the first annual adjustment of the Public Purpose Program (PPP) Charge to recover costs of forgiven arrearages, PG&E, SCE, SDG&E, and SoCalGas shall provide remittance payments to participating CCAs on a monthly basis for costs recovered through the PPP charge for generation-related costs associated with arrearages forgiven under an Arrearage Management Plan for customers of the participating Community Choice Aggregator.
7. Customers receiving Core Aggregation Transportation service may enroll in AMP subject to the following conditions:
  - a. PG&E and SoCalGas customers receiving Core Aggregation Transportation service from third-party gas providers, including Core Transport Agents, shall only be eligible for forgiveness of gas charges owed to PG&E and SoCalGas when either company is the billing agent for the customer.
  - b. Customers of SDG&E receiving Core Aggregation Transportation service from Core Transport Agents shall not be eligible for forgiveness of gas arrearages.
8. PG&E, SCE, SDG&E, and SoCalGas shall begin enrolling eligible customers in AMP programs within 30 days of the effective date of this decision.



This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on December 17, 2020; the following Commissioners voting favorably thereon:

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Rachel Peterson  
Acting Executive Director