ALJ/RP6/kp7 **Date of Issuance 11/26/2025**

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Update the California LifeLine Program.	FILED PUBLIC UTILITIES COMMISSION NOVEMBER 20, 2025 SAN FRANCISCO, CALIFORNIA RULEMAKING 25-11-005

ORDER INSTITUTING RULEMAKING TO UPDATE THE CALIFORNIA LIFELINE PROGRAM

Summary

We open this rulemaking to continue the work initiated in Order Instituting Rulemaking (R.) 20-02-008, which updated the California Universal Telephone (California LifeLine) program. The program provides discounted monthly phone services to eligible low-income California households and helps make communications services more accessible and affordable. Several decisions were issued in R.20-02-008 that resolved key issues, including the establishment of a long-term foster youth program, the initiation of a standalone broadband pilot program, and the temporary freeze of the specific support amount for wireless and wireline providers at $19.00 per month.

However, numerous broad and complex issues remain. These issues include consideration of a new methodology for determining the amount of subsidy provided by the program, enabling independent enrollment, considering strategies to leverage partnerships with social service agencies and community-

based organizations, and responding to the needs of program participants during disasters. Accordingly, we open this rulemaking to address these issues. This proceeding serves as the successor proceeding to R.20-02-008.

1. Background

The California Legislature enacted the Moore Universal Telephone Service Act (Moore Act) to make high-quality basic telephone service accessible and affordable to the greatest number of Californians.[1] The California Public Utilities Commission (Commission) established the California Universal Telephone (California LifeLine) program to implement the Moore Act.[2]

Through California LifeLine, the Commission provides a subsidy, or specific support amount (SSA) to qualified low-income participants for wireline, fixed Voice over Internet Protocol, or mobile voice and broadband services.[3] The California LifeLine Fund pays this subsidy through a surcharge on all access lines in California.[4] The federal Lifeline program provides an additional monthly subsidy for telephone and broadband services to qualified Californians.

In Decision (D.) 10-11-003, the Commission established a methodology for calculating the SSA, which sets the SSA at 55 percent of the highest basic

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[1] Pub. Util. Code §§ 871 *et seq*.

[2] The Commission refers to the program enacted by the Universal Telephone Service Act as the California LifeLine program. (*See* D.10-11-033 at 2.)

[3] *See generally* D.24-12-006 (freezing SSA temporarily at $19.00).

[4] D.22-10-021 at 52 (defining "Access Line" as "wire or wireless connection that provides a real time two way voice telecommunications service or [Voice Over Internet Protocol] service to or from any device utilized by an end user, regardless of technology, which is associated with a 10-digit NPA-NXX number or other unique identifier and a service address or Place of Primary Use in California.")

residential rate of the California Carriers of Last Resort.[5] Under this methodology, the SSA's annual increase was tied to AT&T's basic rate, which is the highest in the state. However, a California LifeLine subsidy for providers that exceeds the services customers receive raises concerns about the California LifeLine program's accessibility, affordability, and the surcharge needed to support it. In D.24-12-006, the Commission temporarily froze the SSA and the minimum service standards for wireline and wireless service providers at $19.00 until the Commission updates the methodology adopted in D.10-11-003.[6] Updating this methodology in a way that considers and addresses concerns about accessibility and affordability is a priority for this new Order Instituting Rulemaking (OIR).

Through this OIR, we also recognize the need to facilitate participation in the California LifeLine program, protect public funds, and improve the program's reputation. Currently, most California LifeLine participants enroll through service providers' "Street Teams." However, the 2022 *California LifeLine Program Assessment & Evaluation*, attached to this OIR as Appendix A, found that most of the waste, fraud, and abuse in the California LifeLine program occurs via Street Teams, not customers.[7] The tactics of Street Teams also contribute to a negative public image of California LifeLine.

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[5] D.10-11-033 at 138, Ordering Paragraph (OP) 6.

[6] D.24-12-006, OP 1.

[7] The full *California LifeLine Program Assessment & Evaluation* is attached as Appendix A. Street Teams are discussed in detail on pages 61-62.

To address these findings, this OIR will consider how to expand consumer outreach and enrollment to include an independent process administered through the Commission's Third-Party Administrator with an improved customer portal. The Commission also plans to consider expanding assistance to California LifeLine applicants through "trusted partners," such as government agencies and/or authorized nonprofit organizations, and continue its efforts to address waste, fraud, and abuse.

Finally, this OIR will build on the California LifeLine program's efforts to respond to the needs of participants during disasters. In D.20-05-043, the Commission ratified a 90-day temporary suspension of the California LifeLine program renewal process, effective March 19, 2020, to provide continued access to California LifeLine during the COVID-19 pandemic.[8] Similarly, on January 30, 2025, the assigned Commissioner issued a ruling in R.20-02-008 temporarily suspending renewal requirements for California LifeLine to ensure continued access to affordable communications for Californians affected by the spread of wildfires and straight-line winds in the state.[9] Instead of continuing to address disaster relief on an *ad hoc* basis, we will consider permanent measures in this OIR.

We anticipate that these potential updates to the California LifeLine program, as well as any new technology, legislation, and policies, will require updates to General Order 153.

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[8] D.20-05-043 at OP 1.

[9] R.20-02-008, *Assigned Commissioner's Ruling Temporarily Suspending Renewal Requirements* (Jan. 30, 2025) at 2-3.

2. Purpose of the Proceeding

We open this proceeding so that the Commission may continue improving the California LifeLine program. Specifically, this OIR will consider a new methodology for calculating the SSA, explore strategies to enhance consumer outreach and enrollment efforts, and address the needs of program participants during disasters.

3. Preliminary Scoping Memo

This OIR will be conducted under Article 6 of the Commission's Rules of Practice and Procedure (Rules). As Rule 7.1(d) requires, this OIR includes a preliminary scoping memo, with preliminary issues (Section 3.1), a preliminary categorization and determination of the need for hearings (Section 3.2), and a preliminary schedule (Section 3.4).

The Assigned Commissioner's Scoping Memo and Ruling (Scoping Memo) will identify the issues this OIR will consider and establish the categorization and schedule for addressing those issues. Parties may inform the Scoping Memo by providing comments on the OIR.

3.1. Preliminary Scope of Issues

The issues that may be considered in the scope of this proceeding are:

1. Updating the methodology used to calculate the SSA;
2. Improving the California LifeLine application and renewal processes including enabling independent enrollment and establishing a Trusted Partner Framework;
3. Developing new rules, policies, or practices to deter waste, fraud, and abuse, and improve consumer and provider participation in the California LifeLine program;
4. Adopting permanent procedures for providing disaster relief to California LifeLine participants; and

5. Updating General Order 153 to reflect changes made through decisions issued in this proceeding, as well as to incorporate new technology, legislation, policies, and other developments.

3.2. Preliminary Categorization, Ex Parte Communications, and Need for Hearing

The Commission's Rules require that an OIR preliminarily determine the category of the proceeding and the need for evidentiary hearings. As a preliminary matter, we determine that this proceeding is quasi-legislative because our consideration and approval of this matter would establish policy or rules affecting a class of regulated utilities. Accordingly, *ex parte* communications are permitted without restriction or a reporting requirement under Article 8 of the Commission's Rules. However, parties are reminded not to contact the assigned Administrative Law Judge (ALJ) outside of a publicly noticed forum, except that parties may send procedural communications to the assigned ALJ.

Pursuant to Rule 7.2(b), the assigned Commissioner has the discretion not to set a prehearing conference in a quasi-legislative proceeding. At this time, we preliminarily determine that a prehearing conference is unnecessary.

We are also required to consider whether evidentiary hearings are necessary. We preliminarily determine that evidentiary hearings are unnecessary.

3.3. SSA Staff Proposal

We plan to prioritize the issue of updating the methodology used to calculate the SSA. As such, a proposal prepared by the Communications Division staff (Staff Proposal) is attached to this OIR as Appendix B. We invite parties to provide comments on the Staff Proposal and/or provide alternative proposals to calculating the SSA. Opening comments/alternative proposals are due December 19, 2025, and reply comments are due January 16, 2026.

3.4. Preliminary Schedule

The preliminary schedule for this OIR is provided below. As mentioned above, we do not anticipate holding a prehearing conference or evidentiary hearings. Additional workshops may be scheduled. The remainder of the proceeding schedule will be adopted in the assigned Commissioner's Scoping Memo and Ruling.

Event	**Date**
Opening Comments on OIR filed and served	Within 30 days of the issuance date of this OIR
Reply Comments on OIR filed and served	Within 10 days of the date opening comments are due
Scoping Memo and Ruling	Approximately 60 days from the issuance date of this OIR
Opening Comments on SSA Staff Proposal	December 19, 2025
Reply Comments on SSA Staff Proposal	January 16, 2026
Workshop on SSA Proposal(s)	Q1 2026
Proposed Decision on SSA	Q3 2026
Commission Decision on SSA	No sooner than 30 days after issuance of the Proposed Decision on SSA
Proposed Decision(s) on All Other Issues	Beginning in Q1 2027

Commission Decision(s) on All Other Issues	No sooner than 30 days after issuance of the Proposed Decision(s) on All Other Issues

The assigned Commissioner or the assigned ALJ may change the schedule to promote efficient and fair administration of this proceeding.

This proceeding will conform to the statutory case management deadline for quasi-legislative matters in Public Utilities Code Section 1701.5. According to Section 1701.5(b), the assigned Commissioner may specify a resolution date longer than 18 months in the Scoping Memo. Here, we recognize that adopting a new SSA methodology, as well as making additional updates and improvements to the California LifeLine program, may require extensive stakeholder input and resolution of complex matters. As such, we preliminarily set a resolution date of May 30, 2028, which is approximately 30 months to resolve all the issues in this proceeding. While this extended timeline allows for thorough consideration, the goal will be to resolve the proceeding sooner if feasible.

4. Respondents

No entities are named as respondents to this OIR. However, all California LifeLine Service Providers operating in California, as defined in General Order 153, Section 2.13, shall comply with any rules adopted by this proceeding.

5. Service of Order Instituting Rulemaking

We will serve this OIR by electronic mail to all parties to R.20-02-008. The initial service list for this proceeding will be established consistent with Rule 1.4(a)(2).

6. Filing and Service of Comments and Other Documents

The Commission's Rules of Practice and Procedure describe how parties must file and serve documents in this proceeding. Parties shall only serve electronic copies of documents on the assigned Commissioner, advisors to the assigned Commissioner, and the assigned ALJ, not by paper copy, unless specifically instructed otherwise.

7. Addition to the Official Service List

Any entity can receive electronic service of documents under Rule 1.9(f) if they request to be added to the "Information Only" category of the official service list. The request must be sent to the Process Office at process_office@cpuc.ca.gov. Please include the Docket Number of this rulemaking in the request. Entities that file comments responsive to this OIR become parties to the proceeding under Rule 1.4(a)(2) and will be added to the "Parties" category of the official service list upon such filing.

Entities interested in receiving service under the "Information Only" or "Parties" categories should promptly request that the Process Office add them to the service list to ensure timely service of comments and other documents.

8. Subscription Service

Entities may monitor the proceeding by subscribing to receive electronic copies of documents published on the Commission's website. There is no need to be on the official service list to use the subscription service. Instructions for enrolling in the subscription service are available on the Commission's website at http://subscribecpuc.cpuc.ca.gov/.

9. Intervenor Compensation

Intervenor compensation is permitted in this proceeding. According to Public Utilities Code Section 1804(a)(1), a customer who intends to seek an award of compensation must file and serve a notice of intent to claim compensation by 30 days after the prehearing conference. As a prehearing conference is not currently anticipated in this proceeding, notices of intent to claim compensation must be filed no later than 30 days after the issuance date of this OIR. However, if a prehearing conference is scheduled, parties seeking intervenor compensation must comply with the 30-day filing deadline set forth in Public Utilities Code Section 1804(a)(1) above. Parties unfamiliar with Commission proceedings may contact the Commission's Public Advisor to learn more about the Intervenor Compensation process.

10. Public Advisor

Any person or entity interested in participating in this rulemaking who is unfamiliar with the Commission's procedures should contact the Commission's Public Advisor in San Francisco at (415) 703-2074 or (866) 849-8390 or email (public.advisor@cpuc.ca.gov). The TTY number for the Public Advisor is (866) 836-7825.

11. Public Outreach

We will serve this OIR by electronic mail to all parties to R.20-02-008. If the Commission conducts additional public outreach, the Scoping Memo will describe it.

O R D E R

IT IS ORDERED that:

1. This Order Instituting Rulemaking is adopted according to Rule 6.1 of the California Public Utilities Commission's Rules of Practice and Procedure.

2. The preliminary scope of issues in this Order Instituting Rulemaking is as stated above in Section 3.1.

3. The preliminary categorization of this Order Instituting Rulemaking is quasi-legislative as described above in Section 3.2.

4. The preliminary determination of this Order Instituting Rulemaking is that evidentiary hearings are not needed as described above in Section 3.2.

5. The preliminary schedule for this Order Instituting Rulemaking is set above in Section 3.4.

6. The preliminary resolution date for this Order Instituting Rulemaking is May 30, 2028.

7. Any entity may file opening comments in response to this Order Instituting Rulemaking within 30 days of its issuance date and may file reply comments within 10 days after the opening comments due date, as described in Section 3.4.

8. The initial service list for this proceeding will be established consistent with Rule 1.4(a)(2).

9. The Executive Director will cause this Order Instituting Rulemaking to be served on the service list for Rulemaking 20-02-008.

10. Parties may provide comments on the *Staff Proposal on LifeLine Specific Support Amount and Minimum Service Standards* in Appendix B, and/or provide

alternative methodologies to calculating the Specific Support Amount. Opening comments are due December 19, 2025, and reply comments are due January 16, 2026.

11. This order is effective today.

Dated November 20, 2025, at San Francisco, California.

ALICE REYNOLDS
President
DARCIE L. HOUCK
JOHN REYNOLDS
KAREN DOUGLAS
MATTHEW BAKER
Commissioners