

Staff Proposal on the Commission's Assessment of Electrical Corporations' Efforts to Enroll FERA-Eligible Customers

In this document Energy Division staff proposes a reporting process that enables the Commission to comply with the requirements of Senate Bill (SB) 1130 (Stats. 2024, Ch. 457). The Commission invites feedback from parties on this proposed process to comply with SB 1130 annual reporting requirements, as required by Public Utilities (Pub. Util.) Code § 739.12(d)(1), 739.12(d)(2) and 739.12(d)(3).

Background

SB 1130 amended § 739.12 of the Pub. Util. Code regarding the Family Electric Rate Assistance (FERA) program. Among other provisions, it requires the Commission to establish a process by which Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (collectively, the Utilities) report annually by March 1 on the efforts to enroll customers into FERA. The Commission is required by June 1 of each year to review each utility's report to ensure it has made reasonable efforts to enroll eligible households in the FERA program commensurate with the proportion of households the Commission determines to be eligible within the electrical corporation's service territory.

If the Commission, in its review of an electrical corporation's report, determines the electrical corporation has not made reasonable efforts to enroll eligible households in the FERA program commensurate with the proportion of households the Commission determines to be eligible within the electrical corporation's service territory, the Commission shall require the electrical corporation to develop a strategy and plan to sufficiently enroll eligible households within three years of the adoption of the strategy and plan.

Proposal

For Bridge Year 2027, Energy Division staff invite parties to comment on this proposal for how the Commission will meet its SB 1130 compliance obligations. Energy Division staff propose the following compliance process for the Commission:

- In 2027, the large electric Utilities each file, by March 1, their FERA Annual Reports summarizing enrollment efforts through a Tier 2 Advice Letter for Program Year 2026.
 - The Advice Letter process allows stakeholders and parties to protest the Utilities' Annual Reports, which the Commission will consider in its review of each utility's report to ensure each has made reasonable efforts to enroll eligible households in the FERA program commensurate with the proportion of households the Commission determines to be eligible.
- If reasonable efforts were made, the Commission would approve the advice letters.
- If the Commission determines that reasonable efforts were not made by a given utility, Commission staff will prepare a Resolution which will require the development of a strategy and plan to sufficiently enroll eligible households within three years of the adopted Resolution.
 - Energy Division staff recognize the narrow compliance window required by statute, March 1 to June 1, and intend to make a determination through a Resolution within the statutory timeframe.

APPENDIX A

In Q4 2024, Energy Division staff developed and provided this informal guidance to the large electric investor-owned utilities (IOUs) regarding relevant factors when assessing “reasonable efforts” under Pub. Util. Code § 739.12(d). The information below is provided only for reference. Energy Division staff propose inviting party feedback to enhance the Commission’s evaluation criteria in the upcoming CARE/FERA program application cycle.

SB 1130 Annual FERA Report: Staff Assessment of Reasonable Efforts

1. Enrollment Rates

- **Proportion of eligible households enrolled** as compared to FERA enrollment goal: 50% by 2023; 70% by 2026 (D.21-06-015)
- If applicable, proportion of eligible households enrolled as compared to (optional) IOU-established interim enrollment targets quarterly, annually, etc.
- **Attrition:** rate of attrition of the program year and reasons for attrition

2. Marketing and Outreach Efforts

- **Public awareness:** efforts to inform eligible households about the FERA program, including marketing, education, and outreach
- **Targeted outreach:** efforts to reach specific customer groups and tailored outreach efforts (e.g. demographic or geographic characteristics)
- **Language and accessibility:** accessibility of outreach materials (e.g., availability in multiple languages or formats accessible to those with disabilities)

3. Enrollment Process

- **Barriers to enrollment:** efforts to minimize barriers to enrollment through the application, recertification, and post-enrollment verification processes
- **Feedback from participants:** feedback or complaints from customers are used to guide IOU in efforts to identify areas of improvement

4. Enrollment Strategies

- **New initiatives and strategies:** IOU develops new initiatives and/or adjusts marketing and outreach strategies based on:
- **Lessons learned** from approaches to marketing, outreach, and enrollment that were successful and unsuccessful
- **New opportunities** for marketing and outreach approaches to reach eligible households, data sharing to help identify eligible households and facilitate enrollment, and process improvements and tools that can streamline the enrollment process and increase retention
- **Leveraging** approaches from other programs that have had success in increasing enrollment rates, such as CARE