

**BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA**

Pacific Gas and electric Company's (U39M) Application for Approval of its 2028-2033 Income-Qualified Programs.	Application 26-01-003 (Filing Date January 9, 2026)
CONSOLIDATED	
Application Of Southern California Edison Company (U338E) for Approval of its Energy Savings Assistance (ESA) and California Alternate Rates for Energy (CARE) Programs and Family Electric Rate Assistance (FERA) And Budgets for Program Years 2028-2033.	Application 26-01-005 (Filing Date January 9, 2026)
Application of San Diego Gas & Electric Company (U902M) for Approval of Low- Income Assistance Programs and Budgets for Bridge Funding for Program Years 2028- 2033.	Application 26-01-010 (Filing Date January 9, 2026)
Application of Southern California Gas Company (U904G) for Approval of its Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets for Program Years 2028-2033.	Application 26-01-011 (Filing Date January 9, 2026)

**REBUTTAL TESTIMONY OF MELISSA W. KASNITZ ON BEHALF OF
CENTER FOR ACCESSIBLE TECHNOLOGY AND HAYLEY GOODSON ON
BEHALF OF THE UTILITY REFORM NETWORK**

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October 16, 2026

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INTRODUCTION

This Rebuttal Testimony is provided in two parts. The response to testimony from the California Emerging Technology Fund, which sets out a proposal for expanded marketing and outreach by energy IOUs to enrolled or potential IQP customers regarding affordable broadband programs in California, is jointly sponsored by Melissa W. Kasnitz on behalf of Center for Accessible Technology (CforAT) and Hayley Goodson on behalf of The Utility Reform Network (TURN). The response to other party testimony addressing SCE's "upfront eligibility" proposal is sponsored solely by Ms. Kasnitz. Ms. Kasnitz's qualifications were provided with CforAT's opening testimony, Exhibit CforAT-01. Ms. Goodson's qualifications appear in Appendix A to Exhibit TURN-04.

I. RESPONSE TO CETF TESTIMONY [KASNITZ & GOODSON]

The California Emerging Technology Fund (CETF) issued testimony focused on efforts to expand marketing and outreach to customers enrolled or applying for IQPs to encourage them to participate in affordable broadband programs.¹ CforAT and TURN strongly support efforts to increase awareness and enrollment of customers into income-qualified or otherwise affordable broadband plans in California, and have supported efforts at the Commission to reach across industry silos and support or otherwise encourage customers enrolled in one Commission-regulated program to register for other programs for which they are eligible. This has included CforAT's work to support the Concurrent Application System (including future efforts to include non-energy programs) and CforAT's and TURN's long history of supporting categorical

¹ Intervenor Testimony of Sunne Wright McPeak, President and CEO, California Emerging Technology Fund (Exh. CETF-1), served on parties on September 14, 2026.

eligibility for Commission-regulated programs based on enrollment in other Commission-regulated programs or other appropriate forms of support.

Because of this history, CforAT and TURN support the intent of CETF's proposals to enhance outreach to customers enrolled in or applying for IQPs. However, CETF's actual proposals do not include cost estimates. CETF's proposals also inappropriately focus all increased outreach through a single channel. Because it is unclear how effective such increased outreach efforts may be and it is also unclear what the cost of such efforts may be, CforAT and TURN recommend that the requested increased outreach proposal should be approved only as a two-year pilot program, and that CETF should be directed to compile information and submit a motion after the two year period to request continuation, modification, or termination of the program based on the results obtained in that time period. The Commission should expressly reserve judgment as to whether any of the outreach activities conducted during the pilot should continue, and if so, at what cost to energy IOU ratepayers (if any), and whether other digital equity organizations should be encouraged to partner with the IOUs on outreach.

A. CETF's Proposal

Through the testimony of CETF President and CEO Sunne Wright McPeak, CETF demonstrates that outreach efforts by energy IOUs, which were previously negotiated through stipulations adopted in prior IQP proceedings,² have resulted in very low numbers of affordable broadband program enrollments that can be directly attributed to the information provided. The form of outreach that has been used to date is referred to as an "indirect-referral model," through which information about affordable broadband opportunities, including a CETF-designated telephone number and web link, is embedded in a mailer or webpage addressing IQP issues.³

² Exh. CETF-1 at pp. 2-3.

³ Exh. CETF-1 at pp. 3-4.

CETF has provided a table showing the number of calls generated to the designated numbers and the number of enrollments generated through the calls.⁴ Because of the low numbers of calls generated and the low percentage of conversion of callers to program enrollments, CETF now proposes to add “Direct Notification” to IQP customers.

B. Digital Divide Data

In testimony, CETF asserts that the number of customers having an email address on file with their energy utility is “a reasonable if rough proxy for a household’s connection to the internet.”⁵ There is no basis provided for this assertion. The testimony also provides a table showing the percentage of PG&E and SCE CARE customers who had an email address on file in 2018 and compares it with the number who have an email address on file in 2024; the number for PG&E dropped significantly while the number for SCE increased significantly.⁶ Subsequently, the testimony states that this table “confirms that a very large share of CARE households still cannot be shown to have basic Internet connectivity at home.”⁷

CforAT and TURN do not dispute the ongoing seriousness of the “digital divide”⁸ showing that low-income and otherwise vulnerable customers continue to be more likely than other individuals to lack internet access or to be underserved (including having internet access only through a smartphone).⁹ However, the use of data on whether an energy IOU has a

⁴ Exh. CETF-1 at p. 5, Table 1. The table is not entirely clear, as it includes a line for “All IOUs” that does not represent the totals provided for the major IOUs; however, the overall results show both low response rates and low conversion rates.

⁵ Exh. CETF-1 at p. 6.

⁶ Exh. CETF-1 at p. 7, Table 2. 2018 data is provided for SDG&E and SoCalGas, but CETF states that comparable data from 2024 was not reported by these utilities. *Id.*

⁷ Exh. CETF-1 at p. 8.

⁸ See <https://ischool.syracuse.edu/what-is-the-digital-divide/>.

⁹ See <https://connectednation.org/blog/keeping-our-eyes-on-the-prize-after-25-years;>
<https://www.pewresearch.org/short-reads/2026/01/08/internet-use-smartphone-ownership-digital-divides-in-u-s/>.

customer email address on file is not a reasonable proxy for broadband access, particularly when no consideration is given to the substantial dropoff shown by PG&E customers during a time period where overall connectivity increased for most populations. Other reasons, such as PG&E's recent effort to direct all customers with an email address on file to online billing, may have caused customers who have an email address to decline to provide it to their energy utility.¹⁰ Thus, while CforAT and TURN acknowledge the need for increased broadband connectivity for low-income populations, the data presented by CETF does not appear to accurately demonstrate the scope of need.

C. Cost and Effectiveness

CETF does not provide estimates for costs associated with its Direct Notification proposal, except to mention in the context of the IOUs' unspent IQP budget capacity that it expects the amount to be "negligible."¹¹ This reference is based on CETF's description of its proposal as primarily requiring printing and insertion of a one-page document describing affordable broadband options in conjunction with mailers being sent to a customer by an IOU for another purpose.¹² However, the testimony also references use of stand-alone postcards, which are not further discussed.¹³ While the potential flyers are described as authorized for insertion into other IQP mail, the language is optional ("may") rather than definitive so it is possible that

¹⁰ See Daniel Borenstein, *420,000 PG&E customers revolt against paperless-billing switch they never OK'd*, The Mercury News, Aug. 22, 2022, available at <https://www.mercurynews.com/2022/08/20/borenstein-420000-pge-customers-revolt-against-paperless-billing-switch-without-their-consent/> (reporting that since the summer of 2020, PG&E had unilaterally stopped sending paper bills to 1.2 million customers who were automatically migrated to online billing, 420,000 of whom contacted PG&E to opt-out of online billing).

¹¹ Exh. CETF-1 at p. 9.

¹² Exh. CETF-1 at p. 9; *see also id.* at pp. 16-17 (costs would include "list preparation, production, postage where a stand-alone mailing is used, and coordination").

¹³ Exh. CETF-1 at p. 16.

they may be mailed independently.¹⁴ There is no clarity as to whether postcards would be expected to be mailed separately. No mailing costs or estimates are provided. Nor is there any estimate provided for the increased cost of mail when additional sheets are included in an envelope. Similarly, CETF would require “stand-alone” direct text and email notification to households, with no costs whatsoever attributed to development or processing of such notices.¹⁵

CETF also identifies that mailers about affordable internet are sent by other entities “at no cost to CETF.”¹⁶ However, outreach conducted at no cost to CETF does not equate to outreach conducted at no cost whatsoever. Indeed, CETF states that all Direct Notification costs “will be included in each IOU’s budget proposal for Commission approval as part of its IQP marketing, education, and outreach (“ME&O”) budget.”¹⁷

At any cost, CETF acknowledges that the effectiveness of its own proposed Direct Notification efforts is likely to be low, with an expectation that over a thousand notifications will be needed to generate a single enrollment in identified programs.¹⁸ While CETF asserts that the proposed Direct Notification approach is more effective than targeted direct mail, the level of effectiveness remains a cause for concern. CforAT has previously discussed challenges with CETF’s efforts to enhance broadband participation in California in the context of its digital literacy efforts, noting that its CBO education program is structured in a manner that may not be effective for specific populations, including CforAT’s constituency of utility customers with

¹⁴ Exh. CETF-1 at p. 16.

¹⁵ CETF states that it would pay for the cost of development of communication materials and provide electronic templates to IOU Applicants. Exh. CETF-1 at p. 16. Presumably this also includes development of stand-alone text and email notifications, but this is not specified.

¹⁶ Exh. CETF-1 at p. 14.

¹⁷ Exh. CETF-1 at p. 16.

¹⁸ Exh. CETF-1 at p. 15.

disabilities and medical needs.¹⁹ While the proposal set forth in CETF's testimony is an outreach proposal rather than a digital literacy proposal, it too relies on a single standard format that CETF admits has a very low rate of leading to enrollments.²⁰ In this context, it would not be appropriate to adopt the proposal without a structured opportunity for review and evaluation.

D. Alternative Proposal for Direct Notice Pilot Program

CETF requests that the Commission continue the previously-adopted provisions of the Joint Stipulation authorized in the recent Bridge Year IQP funding proceeding (it is not clear whether the IOUs join in this request),²¹ and that it order the IOUs to add a Direct Notification component.²² It also appears to request that this expanded obligation should extend through the duration of the new IQP cycle. While this is framed as an extension to the existing Joint Stipulation, it more accurately appears to be a request for the Commission to order the IOUs to extend their cooperation with CETF beyond any agreed framework, and to do so for somewhere between 4-6 years (depending on the length of the cycle authorized), at an unknown cost and an unknown level of effectiveness.

Because CforAT and TURN support the goals of the CETF program, we recommend that the Commission should, in fact, authorize the requirements described by CETF, but it should do so for a pilot period of no more than two years. During that time, CETF should be directed to

¹⁹ See Declaration of Lisa Stringer, Executive Director of Center for Accessible Technology, in Support of Comments on CETF Settlement, including exhibits, filed in A.25-07-016 (Charter/Cox Merger Proceeding) on June 1, 2026. A copy of this declaration, including exhibits, is attached here.

²⁰ CETF states that it has a goal of 99% enrollment of CARE customers online within 5 years. Exh. CETF-1 at pp. 15-16. Using its own proxy figures of customers having an email address on file with their energy utility as a stand-in for online access and its own estimate of requiring 1125 notifications to achieve one enrollment, this goal cannot plausibly be reached through Direct Notification. For PG&E alone, CETF says 84.5% of CARE customers appear to lack access, totaling 1.19 million households. Based on its own estimate of notification touches required, PG&E would need to send 1.34 billion notifications over the next five years to meet their goal of full enrollment.

²¹ See Exh. CETF-1 at p. 15. The prior agreement was approved in D.26-07-007, issued in A.25-06-022 et al.

²² Exh. CETF-1 at pp. 15-17.

collect enrollment data consistent with a clarified version of its Table 2, and cost data to be collected from the partner utilities. At the conclusion of the two-year pilot period, CETF should be directed to file a motion (or, if this proceeding is closed, an application), including the cost data and the enrollment data, so that policymakers and stakeholders can consider the cost and the effectiveness of the increased outreach effort. At that time, CETF should be authorized to request that the program be extended, modified, or terminated, based on the information in the collected data. Other stakeholders should have an opportunity to review the motion, obtain discovery if appropriate, and respond. At that time, the Commission can consider whether to further authorize a Direct Notification requirement based on better data than is available today, and if so, at what cost to energy IOU ratepayers. It can also consider whether there are alternative forms of beneficial co-marketing that might be more effective at increasing enrollment in affordable broadband programs among IQP customers, including, but not limited to, inviting other digital equity organizations to partner with the IOUs on outreach.

II. RESPONSE TO TESTIMONY ADDRESSING SCE’S UPFRONT ELIGIBILITY PROPOSAL [KASNITZ]

In testimony, multiple non-utility parties addressed SCE’s proposal to demand eligibility documentation from every CARE applicant and every CARE recipient upon renewal, highlighting the proposal’s costs, the burden on low-income customers, and the lack of evidence that this proposal would solve an identified problem. The testimony provided by these other parties, including TURN and Cal Advocates, supplements the initial testimony provided by CforAT raising concerns about the same proposal.

In our opening testimony, CforAT stated that SCE’s proposed upfront eligibility verification process would “remove or prevent enrollment of a substantial number of customers from the program who meet eligibility standards but do not successfully navigate the enrollment

process.”²³ In addition, CforAT stated that the proposal would adversely affect “otherwise-eligible customers who are nevertheless barred from the program.”²⁴ SCE probed this statement in a data request; SCE’s request and CforAT’s response (including attached documents) are provided here to supplement the record.²⁵ In response to SCE’s inquiry about studies and analysis in support of our statements, CforAT noted that we had not prepared a specific analysis of the number of customers that would lose access to CARE based on SCE’s proposal, but we noted that the premise referenced – that increased documentation requirements lead to reduced enrollment in benefit programs – is not reasonably subject to dispute, and we provided references to leading studies and analysis showing that increases in administrative burden reduce program participation as a general matter.

We note that other parties have highlighted how SCE’s own testimony and responses to data requests have provided more information making clear that the imposition of upfront verification would reduce program participation, including an estimate of the number of customers who would lose access to CARE without any actual showing of whether these households satisfy the eligibility criteria. Specifically, TURN noted that SCE itself expected a decline in enrollment visible through its request to reduce its enrollment goal down to 92% of the estimated eligible population,²⁶ and further noted SCE’s expected reduction of 35% in forecasted CARE enrollments.²⁷

²³ CforAT-01 at p. 12.

²⁴ CforAT-01 at p. 14.

²⁵ CforAT Response to DR SCE-C4AT-001, including attachments.

²⁶ See Exh. TURN-02 at pp. 4-18, including citations.

²⁷ Exh. TURN-02 at p. 6 (referencing SCE’s response to TURN DR 5, q.21, provided in Exh. TURN-02-Atch01).

Like CforAT and TURN, Cal Advocates opposes SCE’s proposal and clearly states that the proposal “purposely creates a significant barrier to entry to the CARE program.”²⁸ Cal Advocates further explains that “SCE has not demonstrated that upfront verification would primarily prevent ineligible customers from receiving CARE benefits rather than impose an additional enrollment barrier that likely also excludes eligible customers. SCE acknowledges this risk and cites research showing that burdensome income-documentation requirements can reduce participation among low-income households, particularly those with irregular employment or limited access to formal income records.”²⁹ Cal Advocates further compares enrollment in LifeLine (the Commission-regulated communications subsidy program) with that for CARE, showing that enrollment barriers contribute to poor participation rates in Lifeline.³⁰ This is consistent with the analysis provided by CforAT to SCE in response to SCE’s data request.³¹

Overall, there is no reasonable dispute that the changes proposed by SCE would reduce enrollment in CARE, and there is no evidence showing how many of those removed from program participation would meet eligibility requirements but be unable to participate because of administrative hurdles. On this basis, the proposal is not reasonable and it should not be adopted.

²⁸ Exh. CA-02 at p. 2-2.

²⁹ Exh. CA-02 at p. 1-9 (internal citation omitted).

³⁰ Exh. CA-02 at pp. 2-5 – 2-6.

³¹ *Beyond Waste, Fraud and Abuse: The Economic Impact of Increasing Compliance Hurdles for the FCC’s Lifeline Program*; The Brattle Group, August 1, 2026 (determining that increasing compliance requirements for participation in the federal low-income communications support program creates measurable economic costs because it diverts resources toward administrative compliance and raises barriers to participation for eligible households).