Application No.:	A.26-01-00~~5~~**3, et al.**
Exhibit No.:	SCE-03**E**
Witnesses:	J. McMillan J. Nham E. Salazar

(U 338-E)

ERRATA

Testimony Supporting Southern California Edison Company's California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA) Programs and Budgets for Program Years 2028-2033

Before the
Public Utilities Commission of the State of California

Rosemead, California
January 9, 2026

enrollment procedures, with landlords or property owners required to pass through the discount to eligible tenants.

b) SCE's CARE Recertification Process

Individuals enrolled in CARE must recertify their eligibility to maintain program benefits, typically every two years. However, several exceptions apply based on customer type and CPUC guidance. Customers identified as having a high probability of CARE eligibility, defined as those with at least an 80 percent likelihood according to each IOU's probability model, are placed on a four-year recertification cycle.[38] Participants in the CARE Expansion Program also follow a four-year recertification period, an increase from the previous two-year cycle.[39] Fixed-income CARE customers may be exempt from future recertification and verification requests after their income has been verified using approved documentation; this exemption remains valid until the account is closed, the customer-of-record name changes, or six years have passed since the last verification.[40] Additionally, group living facilities and agricultural housing customers are subject to a four-year recertification cycle.

Recertification uses a self-attestation process, meaning customers confirm their income eligibility without submitting supporting documentation unless specifically requested by SCE. To facilitate timely recertification, notices are sent 90, 60, and 30 days prior to the deadline. Customers may complete the process via mail, phone, or online.

Failure to recertify by the deadline results in automatic de-enrollment from the CARE program, and the customer is transitioned to their Otherwise Applicable Tariff.

SCE has experienced a ~~significant~~ decline in the number of CARE recertification notifications issued in recent years. In 2018, prior to the COVID-19 pandemic, SCE sent

[38] D.21-06-015, OP 27, pp. 94, 476.

[39] *Id.,* OP 6 p. 33.

[40] *Id.* p. 34.

out approximately 178,883 recertification letters to customers enrolled in these income-qualified programs.[41] However, by 2024, that number had dropped ~~sharply~~ to ~~51,861~~ — **135,309**.[42] This reduction is largely attributed to Emergency Protection Orders issued by the Governor,[43] which temporarily exempts CARE customers from standard recertification requirements for at least one year from the effective date. While these orders were intended to provide relief to vulnerable households during a time of economic uncertainty, they have unintentionally hampered the traditional PEV process used to confirm accurate eligibility

c) SCE's CARE Post-Enrollment Verification (PEV)

SCE performs post-enrollment income verification (PEV) so that participants in its low-income assistance programs continue to meet eligibility criteria. This process is implemented through two primary methods: traditional verification and high usage verification. Traditional verification entails the random selection of up to 7 percent of CARE program participants each year, as specified in SCE's income-qualified program reporting. High usage verification applies to households that exceed 400 percent of their baseline energy usage on three separate occasions within a 12-month period. This requirement is established under California Public Utilities Code Section 739.1(i)(1) and by D.21-06-015, which directs utilities to confirm ongoing eligibility for high-usage CARE customers.

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[41] SCE 2018, CARE/FERA Annual Report CARE Table 2.

[42] SCE 2024, CARE/FERA Annual Report CARE Table 2.

[43] On July 19, 2019, the Commission issued D.19-07-015, the Decision Adopting an Emergency Disaster Relief Program for Electric, Natural Gas, Water, and Sewer Utility Customers, establishing emergency disaster relief protections to be put in place for consumers whenever the Governor's Office or the President of the United States declares a state of emergency. Among other things, the protections include a requirement that to support low-income customers in disaster impacted zip codes by freezing all standard and high-usage reviews for CARE eligibility. *See* D. 19-07-015, Conclusion of Law (COL 14, p. 58).

will be updated to reflect these new requirements and maintain consistency in the application process.

To formalize these changes, SCE will submit an Advice Letter (AL) alongside the annual adjustment of income limitations for the CARE program, including revised tariff sheets.[67] This approach provides transparency and supports a uniform standard for program administration. While the shift to upfront eligibility may initially raise concerns that documentation requirements could discourage participation, particularly among low-income customers, the process of proving income or categorical eligibility is a common practice for most other public service programs. It is a necessary step to avail substantial bill savings to program participants.

SCE's 2024 CARE Annual Report highlights that, although approximately ~~104,000~~ **116,094** customers out of 306,000 new enrollments did not respond to verification or recertification requests, this drop-off does not reflect permanent disengagement. In fact,14 percent of those de-enrolled for non-response re-enrolled within 12 months,[68] demonstrating a continued willingness to participate once obstacles are addressed. Moreover, the 2019 Low-Income Needs Assessment (LINA) found that post-enrollment verification processes not only remove ineligible participants but also retained eligible ones. Notably, 54 percent of de-enrolled customers were still eligible for CARE and many returned to the program within a year. However, while off CARE, these households experienced significantly higher rates of arrearages and disconnections, which illustrates the importance of continuous and accurate enrollment to protect vulnerable customers from financial instability.[69] By moving verification to the beginning of the process, SCE aims to minimize disruptions and maintain consistent support for those in need.

[67] D.12-08-044, OP 119.

[68] SCE 2024CARE/FERA Annual Report. California Public Utilities Commission, CARE Table 3.

[69] Opinion Dynamics, LINA Final Report: Volume 1 of 3: Summary of Key Findings, December 13, 2019, p. 24-28, *available at* https://www.calmac.org/publications/2019_LINA_-_Final_Report_-_Vol_1_Summary_of_Key_Findings__-_12132019.pdf.