SOUTHERN CALIFORNIA EDISON
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Managing Director, State Regulatory Operations

January 29, 2021

Executive Division
Attention: Rachel Peterson
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Reply Comments of Southern California Edison Company on Draft Resolution M-4849 Authorization and Order Directing Utilities to Extend Emergency Customer Protections to Support California Customers Through June 30, 2021, and to File Transition Plans for the Expiration of the Emergency Customer Protections

Dear Executive Division,

Pursuant to Rule 14.5 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission or CPUC), Southern California Edison Company (SCE) hereby submits its Reply Comments on Draft Resolution M-4849 (Draft Resolution). The Draft Resolution proposes to extend Emergency Customer Protections through June 30, 2021 and to order the utilities to develop transition plans to address the eventual expiration of the Emergency Customer Protections.

SCE does not oppose the Draft Resolution’s proposal to extend Emergency Consumer Protections for residential and small business customers through June 30, 2021 and agrees that extending the memorandum accounts established pursuant to Resolution M-4842 to track incremental costs associated with complying with this Draft Resolution is appropriate and necessary to support the extension contemplated by the Commission.

I. BACKGROUND

On January 15, 2021, the Draft Resolution was issued proposing an extension of the current customer protections adopted in Resolution M-4842 through June 30, 2021 and requiring the utilities to submit transition plans detailing how they will prepare customers for the expiration of the customer protections. On January 22, 2021, SCE submitted opening comments to the Draft Resolution.[1]

II. DISCUSSION

A. Inclusion of Additional Programs in Utility Transition Plans Should be Limited to Programs Administered by the Utility

In their opening comments, the Joint Consumers[2] propose the "Draft Resolution be modified to require the utility transition plans to also include information and promote the availability of any additional utility assistance programs to the extent these resources become available."[3] The Joint Consumers provide examples of these programs, such as the federal Low Income Home Energy Assistance Program and the new federal Emergency Rental Assistance Program.[4] SCE agrees with the Joint Consumers' overall intent to provide customers with information and access to multiple programs that may help customers with their utility bills.

SCE is supportive of inclusion and promotion of the availability of its own administered programs in the transition plans, however, SCE may not be aware of customer programs that are administered or being proposed by other entities. It would be unreasonable for any utility, including SCE, to be required to track every public or private assistance program that a customer could potentially qualify for. Furthermore, it is inappropriate to require SCE customers to fund marketing and outreach for programs that SCE does not administer itself. SCE's support for the proposal is therefore limited to programs administered by SCE.

B. The Disconnection Cap Calculation Should Not be Modified

In their opening comments, the Joint Consumers recommend a modification to the monthly disconnection cap for large energy investor owned utilities (IOUs).[5] The Joint Consumers explain that the options they propose are designed to "prevent the IOUs from conducting a large number of disconnections immediately after the Emergency Consumer Protections are lifted."[6] SCE wants to reassure the Joint Consumers that the

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[1] In addition to SCE, the following parties either individually or jointly submitted responses to the Draft Resolution: California Choice Association (CalCCA), The Utility Reform Network (TURN), National Consumer Law Center (NCLC), Center for Accessible Technology (CforAT), Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), Southern California Gas Company (SoCalGas), The Wireless Association (CTIA), California Water Association (CWA), and Great Oaks Water Company (Great Oaks).

[2] Joint Consumers are comprised of TURN, NCLC, and CforAT.

[3] Joint Consumers' Opening Comments, pp. 6-7.

[4] *Id.*

[5] *Id.*, p. 9.

[6] *Id.*, p. 10.

scenario where unprecedented numbers of residential customers are suddenly facing disconnections would not occur due to policy and operational factors.

Prior to considering any modifications to the Disconnection Cap calculation[7] from D.20-06-003, issued in the Energy Disconnections and Reconnections Rulemaking, R.18-07-005, the multiple protections for the customer that were also ordered in D.20-06-003 should also be considered. Specifically, residential customers shall not be disconnected for nonpayment:

- until the utility offers to enroll eligible customers in all applicable benefit programs administered by the utility;[8]
- until the utility offers a 12-month payment plan, or if the customer is on a 12-month payment plan and is current on both monthly bills and the 12-month payment plan;[9]
- if the customer currently has a Low-Income Home Energy Assistance Program (LIHEAP) pledge pending;[10] or
- when temperatures above 100 degrees or below 32 degrees are forecasted based on a 72-hour look-ahead period.[11]

While the IOUs are not required to make an affirmative inquiry about every residential household and whether they are enrolled in all applicable benefit programs, the utility has a duty to inquire if the customer is interested in hearing about applicable benefit programs if the utility has discussions with a residential customer prior to disconnection.[12] After being made aware, residential customers are then given two billing cycles to enroll in the programs.[13] In addition to these programs, certain California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA) customers would be eligible for arrearage forgiveness through the Arrearage Management Plan (AMP), which is set to begin on February 1, 2021.[14]

Given these policies, the number of potential disconnections immediately following the end of the disconnection moratorium shrinks considerably. With the Draft Resolution's proposed extension to June 30, 2021, there are likely to be temperature limitations on disconnections as well. For example, in July 2019, there were temperature-related limits on disconnections invoked in one or more cities on 16 of the 22 possible business

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[7] D.20-06-003, Appendix 1.
[8] *Id.*, Ordering Paragraph (OP) 1(c).
[9] *Id.*, OP 1(d).
[10] *Id.*, OP 1(e).
[11] *Id.*, OP 1(f).
[12] *Id.*, OP 1(c).
[13] *Id.*
[14] Resolution E-5114.

days in the month.[15] In August 2019, there were limits invoked on 18 of the 22 possible business days.[16] In addition to the protections based on temperatures, customers that contact SCE will also be provided an opportunity to enroll in applicable programs or a 12-month payment plan.

Beyond the policies and additional protections from D.20-06-003, it would be operationally infeasible for SCE to conduct a massive disconnection event that is equal to its annual cap in a short time. Even without the Emergency Consumer Protections in place, SCE did not disconnect all customers that were eligible for disconnection on any given day. The actual number of customers that could be disconnected was based on operational limitations such as the expected number of calls received by SCE's Customer Contact Center.

Finally, because the Disconnection Cap was ordered in D.20-06-003, the Joint Consumers should file a Petition for Modification (PFM) in the appropriate proceeding (R.18-07-005) to request any changes.

C. Reporting Requirements Included in the Transition Plan Should Allow for Flexibility to Provide Alternative Metrics from those Included in the Draft Resolution

In its opening comments, SoCalGas recommends flexibility in the proposed metrics required by the Draft Resolution.[17] Similarly, PG&E also requests flexibility to propose different or additional metrics.[18] SCE supports both of SoCalGas and PG&E's requests for flexibility in proposing different or additional metrics. As a guiding principle to what metrics should be used, SCE intends to propose metrics that are impactful, provide insight into SCE's operations, and are uniform across the energy IOUs to provide meaningful comparisons. SCE recommends the metrics be:

- discretely defined,
- quantitative data driven, and
- remove outside factors where possible.

Discretely defined metrics allow for comparisons between the energy IOUs and limit the potential for confusion. Metrics that are quantitative in nature serve to eliminate different interpretations of the same situation from multiple parties. The removal of

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15 *See* SCE 2019 Monthly Disconnect Data Report https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M330/K687/330687647.PDF Equivalent 2020 data is unavailable due to the Emergency Consumer Protections moratorium on disconnections that resulted in not needing to track temperature thresholds after April of 2020.

16 *Id.*

17 SoCalGas Opening Comments, p. 5.

18 PG&E Opening Comments, p. 3.

outside factors also focus the metrics on policies that can be influenced by the actions of the IOUs.

One example of a flawed metric would be the current proposal to track the number of IOU call center complaints concerning payment plans.[19] This metric is not discretely defined, as customer complaints regarding payment plans can originate from multiple causes that may not necessarily speak to the IOU's activities, and different customer service representatives may construe the same situation differently. This also renders a seemingly quantitative measure into something more qualitative. There may be different interpretations of whether the customer is making a complaint or asking for a modification to their current payment plan. Finally, this metric does not control for outside factors. A customer may be unhappy with the payment plan due to external factors that impacted the customer's ability to stay current. In that instance, SCE's program and policies did not result in the customer's dissatisfaction or complaint.

Instead of the proposed metric, SCE would recommend using the number of customers enrolled in a payment plan, percentage of customers that complete the payment plan, and percentage of customers that request additional payments plans beyond the first to be better indicators of the impact on customers. Because SCE's proposed metrics are data driven, there is less likely to be different interpretations and differing results.

III. CONCLUSION

SCE appreciates the opportunity to submit these reply comments, and respectfully requests that the Commission adopt the recommendations as explained herein.

Southern California Edison Company

/s/ Gary A. Stern
Gary A. Stern, Ph.D.

GAS:el:cm

cc: April Mulqueen, CPUC
Service Lists for A.20-03-014, A.19-11-003, A.19-09-014, R.18-07-006, R.18-07-005, R.18-03-011, R.17-06-024, R.15-03-010, and R.12-06-013

[19] Draft Resolution, p. 15.