

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 10, 2025

To: California LifeLine Service Providers

Subject: **MANDATORY PROCESS FOR THE SERVICE PROVIDER INTAKE
APPLICATION PROGRAMMING INTERFACE (SPIA) CREDENTIALS**

The Communications Division (CD) has updated the requirements for obtaining and maintaining a Service Provider Intake Application Programming Interface (API) or SPIA credential. All California LifeLine Service Providers must comply with this new credential process for SPIA.

Background:

SPIA is a web-based API solution that enables service providers to submit new applications, renewal forms, and subscriber transfer requests; update applicant and subscriber information; cancel pending applications; and/or de-enroll subscribers in near real-time. The purpose of SPIA is to provide quick data processing, which improves efficiencies for eligibility decisions and LifeLine participant status updates.

1. Increase in Complaints

Since the implementation of SPIA in March 2022, the CPUC has received a significant increase in Waste Fraud and Abuse (WFA) subscriber complaints regarding unauthorized benefit transfers. In 2021, the Third-Party Administrator (TPA) received 952 complaints. From September 2024 to August 2025, the TPA received 20,334 complaints, representing a 2036% increase. In response to this rise in WFA complaints, the CPUC is implementing new requirements for obtaining and maintaining SPIA credentials.

2. SPIA Credential Issuance

Each Service Provider is authorized one SPIA credential based on a demonstrated business need to enroll applicants and a technical capability to use SPIA. However, SPIA credentials are not required, and SPIA access may be denied, requiring manual enrollment. Requests for additional SPIA credentials will be considered by CD on a case-by-case basis, and requests must be supported by a well-justified business need.

3. Service Provider Requirements

Only authorized California LifeLine Service Providers may offer California LifeLine services. Service Providers must have a confirming, verbal conversation with the applicant or subscriber during the enrollment process that provides the required notices.¹

¹ See General Order 153, Sections 4.2.1, 4.2.5, and 4.2.7.

Service Provider Advice Letter Requirements:

1. SPIA Credentialing Process for All Service Providers

Effective immediately, California LifeLine-Service Providers that wish to utilize SPIA must file a Tier 2 Advice Letter (AL) to maintain existing or request new SPIA credentials. The AL must clearly articulate the business need for each SPIA credential and must include the following information:

- **Purpose and Use of SPIA:** Provide a detailed explanation of the intended use and the need for a SPIA credential in the Service Provider's process, including initial solicitation through enrollment, benefit transfer, renewal, and de-enrollment.
- **SPIA Users:** Provide a list of all staff, agents, contractors, or other third parties who will access SPIA. For each user, describe their role and the actions they will perform using SPIA.
- **Visualization of Service Provider Process:** Provide a flow chart or visual depiction with a narrative description of the enrollment, transfer, and de-enrollment processes that interact with the SPIA via Client Record Management or other interfaces, including all individuals or third parties involved.
- **Obtaining Participant Consent:** Describe the steps to obtain a LifeLine participant's knowing, voluntary, and informed consent for LifeLine processes including enrollment, benefit transfer, or renewal processes. Explain how the Service Provider will record and memorialize a LifeLine participant's consent, how the Service Provider will manage its LifeLine participants' records, and the role of any third-party vendors involved in the Service Providers' LifeLine processes.
- **Operational Controls:** Explain operational controls to prevent misuse or unauthorized SPIA transactions, including internal auditing and monitoring procedures. Provide details on training in privacy, confidentiality, and procedures to limit access to SPIA and protect participants' data.

2. Service Providers with Existing SPIA Credentials

California LifeLine Service Providers with existing SPIA credentials must file a Tier 2 AL by November 14, 2025. Failure to submit an AL by the deadline will result in the suspension of the Service Provider's existing SPIA credential and access to SPIA APIs.

If a Service Provider already holds more than one SPIA credential, the Service Provider's AL must demonstrate a well-justified business need for the additional credentials. CD reserves the right to rescind any existing SPIA credential. Service Providers who are approved for their SPIA credentials via AL will be issued a SPIA Agreement Letter, the terms of which will be provided in a future Administrative Letter.

Service Providers must report any suspected misuse, unauthorized access, or data breaches related to SPIA to the TPA (TPA@californialifeline.com) and CD (lifeline@cpuc.ca.gov) within 24 hours of the incident.

Suspension or Restriction of SPIA Credentials:

The use of SPIA credentials is subject to compliance with the rules of the LifeLine program and General Order 153. Failure to comply may result in suspension and/or revocation of the Service Provider's SPIA credentials.

The following factors may be considered in determining the length and severity of any restriction on SPIA access:

- **Scale of Impact:** The number of LifeLine participants impacted.
- **Severity of Harm:** The degree of damage or inconvenience caused to LifeLine participants.
- **Unauthorized Credential Sharing:** If SPIA credentials have been shared improperly or without authorization.
- **Non-Responsiveness:** Failure to respond to CD inquiries by the specified deadlines (e.g., request for additional information, data requests, supplemental documents for claims).
- **Repeated Violations:** A history of non-compliance or recurring issues by the Service Provider.

These measures are necessary to ensure Service Providers' compliance with the program rules and to maintain program integrity.

If you have any questions regarding this Administrative Letter, please contact Danyel Cordoba at 415-696-7348 or DYL@cpuc.ca.gov.

Sincerely,



Gelareh Safavi
Communications Division Program Manager
California Public Utilities Commission