REPORT TO THE LEGISLATURE

Report on Residential and Household Utility Service Disconnections Pursuant to Public Utilities Code Section 910.5

2016-2020 Results

June, 2021



California Public Utilities Commission

A digital copy of this report can be found at:

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Executive Summary

This is the fourth annual report issued by the California Public Utilities Commission (CPUC) pursuant to Public Utilities (PU) Code Section 910.5 and Senate Bill (SB) 598 (SB 598 Report). It summarizes actions the CPUC has recently taken to reduce residential disconnections of utility service by the four largest electric and gas corporations (SCE, SoCalGas, SDG&E, and PG&E, (collectively the "IOUs"), and presents information on electric and gas residential service disconnections and reconnections for each these utilities during the period from 2016 through 2020.

In July 2018, the CPUC opened Rulemaking (R.)18-07-005 to consider new approaches to reducing disconnections, hastening reconnections, and improving energy access for residential customers. In December 2018, the CPUC approved Decision (D.)18-12-013 (the "Interim Decision"), which banned the large IOUs from disconnecting customers who are on medical baseline or when temperatures are extremely high or low. The Interim Decision also set up a goal of limiting the rate of residential customer disconnections to each utility's 2017 disconnection rate.

The CPUC has taken a number of proactive measures in 2020 and 2021 to suspend disconnections and implement other customer protections in response to the Covid-19 pandemic. These resulted in a significant reduction in residential disconnection rates across the large energy utilities. This trend is illustrated in the following graph.¹



¹ This graph is included in the body of the report as Figure 1.

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For the electric IOUs, the disconnection rate rose steadily for several years before declining modestly in 2018 and 2019. However, SoCalGas's disconnection rate has not shown the same trend of increasing disconnection rates, though it has reported a modest decline in recent years. In 2020, all utilities reported their lowest disconnection rate in the ten-year period.

The CPUC has committed to hastening reconnection timelines to ensure customers receive adequate utility service, especially for gas service which requires a field visit for manual reconnection. The CPUC has strongly encouraged utilities to strive for a 90 percent reconnection rate within 24 hours. In 2020, electric IOUs narrowly failed to achieve this goal, reporting reconnections within 1 day occurred for just under 90 percent of customers disconnected. However, SoCalGas reported far fewer reconnections within 24 hours than the 90 percent goal articulated by the CPUC. The chart below shows, for each IOU, the share of reconnections performed within a certain period of time.²



Although SoCalGas's 46 percent of reconnections within 24 hours is significantly short of the CPUC's 90 percent goal, SoCalGas does report a reduction in the share of reconnections performed requiring more than 2 days since 2016, as well as an accompanying increase in the share of reconnections performed in less than 2 days. The chart below shows the increase in SoCalGas's share of reconnections performed within 2 days.³

² This chart is also included as Figure 13 later in the report.

³ This chart is also included as Figure 12 later in the report.

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A full discussion of trends in disconnection and reconnection data reported by the utilities is included in this report beginning on Page 13. The following is a summary of CPUC actions taken in 2020-2021 to reduce disconnections for nonpayment.

1. Disconnections Rulemaking Phase I Decision

On June 16, 2020, the CPUC approved D.20-06-003 ("Phase I Decision"), which ordered numerous changes to disconnections policies for the large IOUs. This decision made permanent the extreme weather protections implemented in the Interim Decision. The Phase I Decision also included numerous new policies for the large IOUs, including requirements to offer 12-month payment plans to all customers prior to disconnection, new rules for contesting determinations that a customer has benefitted from previous unpaid service, requirements that customers be enrolled in all applicable benefit programs prior to disconnection, and direction to the utilities to increase cooperation with the California Department of Community Services and Development (CSD) to streamline and improve the functionality of the Low Income Home Energy Assistance Program (LIHEAP).

In addition to these new policies, the Phase I Decision directed IOUs to implement Arrearage Management Plan (AMP) programs. Following Commission approval of Resolution E-5114 on December 17, 2020, IOUs began enrolling customers in February 2021. These programs, based on successful programs implemented in other states, allow low-income customers with large past-due balances to receive debt forgiveness in exchange for on-time payment of regular monthly bills. When a customer enrolls in AMP, the utility agrees not to initiate disconnection or collections referral while the customer is enrolled, and after 12 months of on-time bill payments, the customer's entire arrearage (up to \$8,000 maximum) is forgiven. More information on AMP is provided in this report under "CPUC Efforts to Reduce Residential Energy Utility Disconnections." D.20-06-003 also authorized a new ratesetting phase of R.18-07-005 for evaluating the reasonableness, scope, and structure of a potential Percentage of Income-based Payment Plan (PIPP) Pilot Program. After a Decision is issued in the PIPP Phase, the CPUC will next consider the applicability of the policies, procedures, and rules established in this proceeding for the large IOUs to the small utilities.

2. Moratorium on Residential and Small Business Customer Disconnections

The CPUC ordered all IOUs and SMJUs to halt disconnections of residential and small business customers for nonpayment beginning in March 2020. The CPUC subsequently approved Resolution M-4842, issuing moratoria on disconnections through April 30, 2021 for nonpayment and ordering utilities to undertake various Emergency Customer Protections to preserve customer access to basic energy needs and well-being during the statewide emergency, including:

- Waiving deposit requirements and late fees for residential customers,
- Implementing payment plan options for residential customers, and
- Freezing standard and high-usage reviews for California Alternate Rates for Energy (CARE)⁴ customers and removals of customers from CARE.

Due to these measures, the utilities have reported many fewer disconnections in 2020 than in previous years, as clearly illustrated in the data furnished in this report.

3. Extension of Emergency Customer Protections and Utility Transition Plans

In February 2021, the CPUC approved Resolution M-4849, extending the Emergency Customer Protections until June 30, 2021, and requiring IOUs and SMJUs to file Transition Plans documenting each utility's plan to protect customer well-being and avoid widespread disconnections following expiration of the Emergency Customer Protections. These plans were originally submitted in draft form on February 26, 2021. Following review and input by CPUC staff, members of the CPUC's Low-Income Oversight Board, and stakeholders, the plans were submitted in final form on April 12, 2021, and approved by the CPUC on April 28, 2021.

4. Moratorium on Medium & Large Commercial & Industrial Disconnections

In March 2021, the CPUC approved a decision implementing a Covid-19 disconnections moratorium to provide relief for the medium and large commercial and industrial (M/L C&I) electric and natural gas customers of PG&E, SCE, SDG&E, and SoCalGas (the IOUs).

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⁴ California Alternate Rates for Energy or CARE provides discounts on energy bills for income qualified households. Eligibility is limited to customers with household income of 200% of Federal Poverty Level, and enrolled customers receive a 30-35 percent discount on electric service and a 20 percent discount on gas service. Specific income guidelines may be reviewed here: https://www.cpuc.ca.gov/lowincomerates/

5. Decision in Arrears Rulemaking R.21-02-014

In July 2021, the CPUC will vote on a Proposed Decision (PD) adopting 24-month payment plans for residential and small commercial IOU and SMJU customers to provide additional relief for arrearages during the Covid-19 pandemic.

Introduction

This is the fourth annual report issued by the CPUC pursuant to Public Utilities (PU) Code Section 910.5.⁵. This report summarizes actions the CPUC has recently taken to reduce disconnections of utility service by the four largest electric and gas corporations, as well as presents information on electric and gas residential service disconnections and reconnections for each of these utilities from 2016 through 2020. The four large utilities are Pacific Gas and Electric (PG&E), Southern California Edison (SCE), Southern California Gas Company (SoCalGas), and San Diego Gas and Electric (SDG&E).

Although disconnection information on small utilities is not required by PU Code 910.5, the CPUC includes six small utilities' disconnection and reconnection data in this report, as it is important to track residential and household service disconnections across California.⁶

In addition to the numerical information required by PU Code Section 910.5, this report provides observations and line graphs of residential disconnection and reconnection trends in the past five years.

Pursuant to PU Code Section 910.5, the information in this report includes the total number of disconnections, the number of unique households disconnected, the total number of reconnected within 30 days, and the number of unique households not reconnected within 30 days. The information is further disaggregated as follows:

- Disconnected one time.
- Disconnected two times.
- Disconnected three or more times.
- Reconnected one time.
- Reconnected two times.
- Reconnected three or more times.

http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC§ionNum=910.5. ⁶ The six small utilities are Southwest Gas Company, Liberty Utilities, Bear Valley Electric Service, Pacificorp, Alpine

Natural Gas Operating Company and West Coast Gas Company.

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⁵ For the text of the PU Code 910.5, see

Disconnections and reconnections are also further subdivided into the following customer subgroups:

- Customers enrolled in the California Alternate Rates for Energy (CARE).
- Customers enrolled in a Family Electric Rate Assistance program (FERA).
- Customers receiving a medical baseline allowance.
- Customers both enrolled in the CARE program and receiving a medical baseline allowance.
- Customers both enrolled in the FERA program and receiving a medical baseline allowance.
- Customers receiving assistance or a benefit under the federal Low-Income Home Energy Assistance Program (LIHEAP).
- Customers of a community choice aggregator (CCA) who, after disconnection, are reconnected to service provided by an electrical corporation.

Although PU Code Section 910.5(a) requires information on residential disconnections for each CCA, CCAs do not actually disconnect customers. In practice, utilities manage the billing and collection processes for CCAs and apply the same residential disconnection policies and processes for CCA and non-CCA customers. Hence, the CPUC relies on the utilities to report on the number of disconnections and reconnections that were from CCA customers.

Low-income customers who are enrolled in the CARE program receive a 30-35% discount on their electric bill and a 20% discount on their natural gas bill. Customers whose total household income is at or below 200% of Federal Poverty Guidelines are eligible for CARE enrollment⁷. Customers may also be eligible for CARE if they are enrolled in public assistance programs such as Medicaid/Medi-Cal, Women, Infants and Children Program (WIC), Healthy Families A & B, National School Lunch's Free Lunch Program (NSL), Food Stamps/SNAP, LIHEAP, Head Start Income Eligible (Tribal Only), Supplemental Security Income (SSI), Bureau of Indian Affairs General Assistance, and Temporary Assistance for Needy Families (TANF) or Tribal TANF.

Families whose household income slightly exceeds the CARE income allowances and is below 250% of the Federal Poverty Guidelines will qualify to receive FERA discounts, which applies an 18% discount on electricity bills. FERA is available for a household with three or more people.

Funded by the federal Department of Health and Human Services, LIHEAP provides financial assistance and energy-related services via local governmental and nonprofit organizations to low-income persons to offset the costs of heating and/or cooling dwellings, and/or have their dwellings weatherized.⁸ Customers with an annual household income below 60% of California's median income will qualify. As Table 1 shows, the maximum income guidelines of LIHEAP are lower than the guidelines of CARE for households of 1-2 people or households of more than 7 people. This implies that many households receiving LIHEAP services are also income-qualified to enroll in CARE, as their income levels are below CARE's income eligibility upper limits. Although this federal support exists, only a small share of disconnected CARE customers receive LIHEAP assistance. In PG&E's territory, only 8.2% of disconnected CARE customers had received

⁸ See California Low Income Home Energy Assistance Program: <u>https://www.benefits.gov/benefit/1540</u>

⁷ See CARE/FERA Programs: <u>http://www.cpuc.ca.gov/general.aspx?id=976</u>

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LIHEAP assistance last year.⁹ For SCE, only 4.8% of disconnected CARE customers had received LIHEAP assistance. For SDG&E, only 1.7% of disconnected CARE customers had received LIHEAP assistance, and for SoCal Gas, it was 0.9%. Due to limited grant funds, LIHEAP only serves approximately 6% of eligible households.¹⁰ Even with increased LIHEAP funding, California Department of Community Services and Development is unable to serve roughly 93% of the eligible customers.¹¹ LIHEAP received additional funding of \$49 million in May 2020 due to the federal Coronavirus Aid, Relief, and Economic Security (CARES) Act.

Household Size	CARE	LIHEAP
1-2	\$34,480	1 ppl: \$29,173
		2 ppl: \$38,149
3	\$43,440	\$47,126
4	\$52,400	\$56,102
5	\$61,360	\$65,078
6	\$70,320	\$74,055
7	\$79,280	\$75,738
8	\$88,240	\$77,421
Each Additional Person	\$8,960	\$1,683

TABLE 1 MAXIMUM INCOME GUIDELINES FOR CARE AND LIHEAP

Medical Baseline allowance is an assistance program for customers who have special energy needs due to qualifying medical conditions. In addition to the standard baseline quantities that all customers receive based on their region, medical baseline customers receive approximately 500 additional kilowatt-hours (kWh) of electricity and/or 25 therms of gas per month at the lowest price available on their rate. In general, a licensed medical provider must certify that a full-time resident at the customer's home has qualifying medical conditions for medical baseline enrollment, including special needs for heating, cooling, and/or life-support equipment.

PU Code Section 910.5 also requires that the CPUC report information about electric and gas customers separately. This presents a challenge when a customer receives both electric and gas service under a single account. PG&E reports that it simply tracks whether a disconnection occurred, but does not specifically track whether the electric, gas or both services were disconnected. However, based on current utility practices, the vast majority of these customers will have their electric service disconnected first and never have their gas service disconnected. The gas service is typically not interrupted because most customers are reconnected for electric service within a short period of time. For customers relying on medical devices powered by electricity, gas would be disconnected instead. Since there is some uncertainty about which service is disconnected for customers who receive dual services, PG&E reports service disconnections and reconnections by three categories: electric service, gas service, and dual commodity service (receives both electric and

http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M243/K013/243013806.PDF

¹¹ In 2020, CSD received \$199 million in regular appropriation compared to \$204 million in 2019.

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⁹ The data source is a data request sent by Energy Division on December 18, 2019. The data for SCE are not available. ¹⁰ California Department of Community Services and Development (CSD) submitted its comments on Proposed Decision 18-07-005. For the comments see

gas service). Because of the dual-commodity utilities' disconnection practices described above, most of PG&E's reported disconnections and reconnections of the customers receiving dual commodity service are actually electric. Therefore, PG&E's dual-commodity disconnections are discussed with electric disconnections together in the section of Disconnection and Reconnection Trends, while gas disconnections will be discussed separately, as the PU Code Section 910.5 requested.

SDG&E does not report such uncertainty in tracking disconnections for customers who receive dual community service. Hence, SDG&E reports disconnections by two categories only: electric service and gas service.

CPUC Efforts to Reduce Residential Energy Utility Disconnections

Per the direction of SB 598 (now PU Code 910.5), the CPUC is prioritizing relief for residential customers from energy utility disconnection rates. In July 2018, the CPUC opened Rulemaking (R.) 18-07-005 to consider new approaches to reducing disconnections, hastening reconnections, improving energy access, and containing costs.

To promptly contain increasing residential disconnections in the large utilities' territories, the CPUC approved Decision (D.)18-12-013 on December 13, 2018,¹² including a goal of limiting IOU disconnections to the 2017 disconnection rate. IOUs reported successfully meeting this goal in 2019, performing approximately 755,000 disconnections statewide, lower than the goal of approximately 889,000 between the four IOUs collectively. On June 11, 2020, the CPUC approved D.20-06-003, which established goals for each IOU to reduce the number of disconnections through 2024. The following table shows each IOU's disconnection goal by year.

Target Date	PG&E	SDG&E	SCE	SoCalGas
07/01/2020	4%	3%	8%	2%
01/01/2021	4%	3%	7%	2%
01/01/2022	4%	3%	6%	2%
01/01/2023	3.5%	3%	5%	2%
01/01/2024	3.5%	3%	4%	2%

TABLE 2: ANNUAL DISCONNECTION RATE TARGETS

Each utility's disconnection goal is calculated as a rolling monthly average of the previous 12 months, in which each utility's total disconnections are divided by the average number of customers. This rolling average may not exceed the utilities' goal rate in any given month. For example, PG&E

http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M252/K025/252025563.PDF

¹² For the text of the D. 18-12-013 see

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shall not exceed a disconnection rate of 4% in any month of 2021. This new methodology was implemented during the moratorium on disconnections, but in 2019 each utility successfully met their previously-established goals by reducing their disconnection rate compared to the 2018 rate.

In order to understand the factors that might explain electric and gas disconnections in the large IOUs territories, Energy Division staff published an empirical analysis in May 2019 and evaluated the relationship between disconnections and socioeconomic, demographic, and weather factors in California at the zip code level.¹³ This study also conducts a geographical analysis which ranks the top ten zip codes with the highest electric and gas disconnection rates using 2018 data. The findings demonstrate the population groups that are vulnerable to disconnections. The results show that residential disconnections positively correlate with some demographic and socioeconomic factors, including the percent of low-income families, the percent of Latino residents, the percent of Black residents, the percent of disabled residents, the percent of renters, and the number of heating degree days¹⁴, and the number of cooling degree days.¹⁵ On April 29, 2021, the CPUC issued the 2019 Annual Affordability Report, pursuant to D.20-07-032, showing many areas of the state overlapping with these high disconnection rate zip codes also experience high levels of utility service unaffordability.¹⁶

In addition to establishing disconnection goals for the IOUs, D.20-06-003 (referred to as the "Phase I Decision") also ordered numerous changes to disconnections policies for the major IOUs. This decision made permanent the extreme weather protections implemented in the Interim Decision. The Phase I Decision also included the following new policies for large utilities:

- Requiring utilities to offer all customers 12-month payment plans prior to disconnection
- Implementing standardized, fair procedural requirements across utilities for determining whether a customer has benefitted from past, unpaid service and can be required to pay it back and options for customers to contest such a determination and provide contrary evidence
- Prohibiting utilities from requiring payment of a deposit for establishment or reestablishment of service
- Prohibiting utilities from requiring payment of a reconnection fee following disconnection

¹³ For the empirical analysis, see Attachment 3,

http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M299/K659/299659741.PDF

¹⁴ The number of heating degree days represent local residents' heating needs and are computed when daily average temperature is less than 65 degrees Fahrenheit. HDD equals to 65(F) minus mean daily temperature. Each day is summed to produce an annual total. A higher value of HDD indicates colder weather and higher heating needs for families.

¹⁵ The number of cooling degree days represent local residents' cooling needs and are computed when daily average temperature is more than 65 degrees Fahrenheit. CDD equals to mean daily temperature minus 65(F). Each day is summed to produce an annual total. A higher value of CDD indicates hotter weather and higher cooling needs for families.

¹⁶ The 2019 Annual Affordability Report is available here:

https://www.cpuc.ca.gov/uploadedFiles/CPUC_Website/Content/About_Us/Organization/Divisions/News_and_O utreach_Office/2019%20Annual%20Affordability%20Report.pdf

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- Prohibiting utilities from exceeding a 30% monthly disconnection rate in any ZIP code
- Requiring utilities to verify customers are enrolled in all applicable assistance programs before initiating a disconnection
- Requiring utilities to work with the California Department of Community Services and Development (CSD) and local partners to create online portals streamlining the application and payment process for the Low-Income Home Energy Assistance Program (LIHEAP)
- Requiring utilities to increase customer education and outreach for the Medical Baseline program and create a streamlined online application process for customers and medical providers
- Establishing an enforcement and citation program in the Commission's Utilities Enforcement Branch to enforce customer protections against disconnection.

In addition to these new policies, the Phase I Decision directed IOUs to implement Arrearage Management Plan (AMP) programs. Following Commission approval of Resolution E-5114 on December 17, 2020, IOUs began enrolling customers in February 2021. These programs, based on successful programs implemented in other states, allow low-income customers with large past-due balance to receive debt forgiveness in exchange for on-time payment of regular monthly bills. Customers must be enrolled in CARE or FERA, have at least \$500 in past-due arrears (\$250 for gas-only customers), have at least one bill that is more than 90 days late, have been a customer of the utility for at least six months, and have made at least one on-time bill payment in the previous 24 months.

When a customer enrolls in AMP, the existing arrearage is set aside and the utility agrees not to initiate disconnection or collections referral while the customer is enrolled in AMP. In each month that a customer makes a full, on-time payment of that month's bill, the utility will cancel 1/12 of the existing arrearage balance. After 12 months of successful bill payments, the customer's entire arrearage (up to \$8,000 maximum) is forgiven. Customers can be removed from the program if they miss two monthly bills in a row or three non-sequential bills, but customers who are removed from the program or complete it successfully may re-enroll after 12 months if they still meet eligibility requirements. CCA customers are eligible for participation, but other categories of customers with atypical billing situations, such as residential Direct Access customers, Net Energy Metering customers, and customers billed on a master meter, have been excluded from participation during initial program implementation. Utilities are authorized to recover the cost of forgiven arrearages from ratepayers using the electric Public Purpose Program charge for electric arrearages and gas transportation rates for gas arrearages.

D.20-06-003 also authorized a new ratesetting phase of R.18-07-005 for evaluating the reasonableness, scope, and structure of a potential Percentage of Income-based Payment Plan (PIPP) Pilot Program. After a Decision is made in the PIPP Phase, the Rulemaking will next consider the applicability of the policies, procedures, and rules established in this proceeding for large utilities to the Small and Multi-Jurisdictional Utilities (SMJUs).

Due to the COVID-19 pandemic, the CPUC ordered all IOUs and SMJUs to halt disconnections for nonpayment beginning in March 2020. The CPUC subsequently approved Resolution M-4842, which implemented moratoria on disconnections for nonpayment and ordering utilities to undertake various actions to protect customer well-being during the statewide emergency. These included:

- Waiving deposit requirements and late fees for residential customers
- Implementing payment plan options for residential customers
- Freezing standard and high-usage reviews for CARE customers
- Coordinating with community outreach contractors to increase outreach and education to low-income customers regarding program changes
- Suspending CARE and FERA program removals
- Discontinuing routine recertification and verification requests that require customers to provide current income
- Meeting and conferring with Community Choice Aggregators to discuss shared roles and responsibilities for emergency protections

In February 2021, the CPUC approved Resolution M-4849, extending the emergency customer protections until June 30, 2021, and requiring IOUs and SMJUs to file Transition Plans documenting each utility's plan to protect customer well-being and avoid widespread disconnections following expiration of the emergency customer protections.

In March 2021, the CPUC approved a decision implementing a Covid-19 disconnections moratorium to provide relief for the medium and large commercial and industrial (M/L C&I) electric and natural gas customers of PG&E, SCE, SDG&E, and SoCalGas (the IOUs). The effective dates of the disconnection moratorium is from December 30, 2020 through June 30, 2021. In addition, the IOUs are directed to track expenses associated with M/L C&I moratorium in memorandum accounts for later review, and to submit quarterly reports to the CPUC's Energy Division to document the number of customers participating in this moratorium.

Utilities Disconnection Practices

As noted earlier, the CPUC has placed a moratorium on all residential disconnection since March 2020. That moratorium is expected to be lifted in June 2021. The following section describes utility disconnection practices that will re-start when the moratorium is lifted. In the effort of collecting payment and preventing disconnection, utilities provide various tools and assistance to help customers manage bills and payments. Customers can manage energy bills and payments, choose due dates, and monitor usage through websites, by phone, or by contacting customer centers. When customers have high usage, past due balances, or become eligible for disconnections, utilities send out notifications and alerts to customers with preferred communication methods such as calls, texts,

emails, or traditional mail. Some customers are assisted by community-based organizations in interfacing with the utility about an imminent disconnection.

In a typical billing process, a customer becomes eligible for disconnection when the account is delinquent. A delinquent account is one where the total bill amount (including current and past due bills) has not been paid through its standard billing and collections process. The following is an example of a utility's billing and collection process:

- **Day 1:** Bill is presented to customers the collection process begins
- Day 19: Bill is due
- **Day 30:** Next bill is presented to customers Overdue notices are sent to customers with this statement, and are either written or electronic depending on customer preference
- **Day 41:** A written disconnection notice is sent to customers informing them of potential disconnection
- Day 49: A phone call to customers attempts a disconnection notification
- **Day 50:** Customers are subject to disconnection a final notification phone call is made to customers before a customer may be disconnected

To avoid a disconnection, customers can set up a payment plan by calling the customer service center or through utility websites. Although there is variability in utilities' policies and practices, it is common for utilities to use a risk assessment to determine when a customer will be disconnected. Factors that are usually considered by utilities include a customer's payment history, past due balance, age of debt, the amount of existing deposit, willingness to enter into a payment agreement, and vulnerability to power disruption. Historically, these factors have been used to determine the length of a payment plan that IOUs would offer to a customer; however, following D.20-06-003, IOUs are required to offer all customers a minimum 12-month payment plan prior to disconnecting the customer.

In general, utilities provide greater protection from disconnections to vulnerable customers, including the elderly, those with serious illness, Medical Baseline, and Life Support. In addition to sending disconnection notifications, utilities make in-person field visits to vulnerable customers prior to disconnections. If vulnerable customers agree to establish payment plans with utilities, their utility service shall not be disconnected.

The electric service of households with smart meters can be remotely shut off, while gas service requires manual disconnections and an in-person field visit. D.20-06-003 requires IOUs to allow gas customers to avoid disconnection by paying at least 20 percent of the past-due balance to a utility field representative and entering into a payment plan. The deployment of smart meters can hasten electric disconnections, but it also makes reconnections immediate. Gas service is manually reconnected and requires a field visit. It can take a day or longer before a field worker enters the premise, inspects, and restores the gas service for a household.

Customers become eligible for reconnection when past due charges are paid or they enter into a payment plan that is accepted by utilities. Remote reconnection orders are usually issued same day, and remote reconnections can be completed within hours.

Data Description

The data for this report was compiled by the utilities in March 2021. In order to create a consistent reporting format of data, the CPUC's Energy Division used spreadsheets as a template and requested utilities to fill in the disconnection and reconnection numbers for the past five years.

Although disconnection information from small utilities is not required by PU Code Section 910.5, the six small utilities' disconnection and reconnection data are included in this report, as it is important to track residential and household service disconnections across California. Analyses of small utilities' numbers are presented in a later section, and the reported numbers are also included in the Appendix.

PU Code Section 910.5 requires the CPUC to report on disconnections that did not reconnect within 30 days. In practice, PG&E, SCE, and SDG&E close customer accounts if they have not been reconnected within 30 days. Hence, these three utilities do not track the number of customers who reconnect after 30 days for the above reason. The utilities report the number by subtracting total reconnections from total disconnections in a year, and this method results in several negative values in the data of disconnections that did not reconnect within 30 days. A negative value is due to a higher number of reconnections than disconnections in a year. This information is presented later in this report in Figures 42, 43, 44, 45, 46, 48 and the Appendix.

SoCalGas reported to be able to track reconnections up to 365 days after a customer has been disconnected. The numbers reported by SoCalGas on disconnections that did not reconnect within 30 days were the actual number – rather than a subtraction – of reconnections longer than 30 days and less than a year. This information is provided later in this report in Figure 47.

Disconnection and Reconnection Trends

This section provides narratives and figures for residential disconnection and reconnection trends from 2016 to 2020 for the large and small utilities. The information includes annual disconnection rates, the growing numbers of CCA customers, payment plans, the number of customers in arrears, the amount of uncollectibles, and reconnections. The line graphs were created by Energy Division staff based on the historical data provided by utilities. PG&E's dual-commodity service information is discussed together with its electric service information, as most disconnections experienced by dual-commodity customers are actually electric disconnections.

Although PU Code Section 910.5 requests disconnection and reconnection data on CCA customers, trend data for this sub-group is not displayed here. CCA disconnections are managed by the

utilities, not by CCAs themselves. When this report refers to "CCA disconnections," it is referring to CCAs returning a customer's account to the utility. All the utilities' reported data on CCA customers can be found in the tables in the Appendix.

Large Utilities' Disconnections and Reconnections

Disconnection Rates 2010-2020

The law requires information on historical disconnection data in each large utility's territory. To compare disconnections across utilities of various sizes over time, the CPUC accounts for population growth and computes an annual disconnection rate, which is the number of disconnections divided by the number of residential accounts of a utility in a year.

As Figure 1 shows, disconnection rates have risen since the CPUC began tracking disconnection rates in 2010, but then declined in 2018 and 2019 before falling substantially due to the disconnection moratorium implemented in March of 2020 and currently scheduled to expire on June 30, 2021. In 2020, SCE's disconnection rate was 1.5%, PG&E's was 0.79%, SDG&E's was 0.62%, and SoCalGas's was 0.29%. Prior to that, disconnection rates across all utilities' territories had declined during 2019 after the Interim Decision was issued in December 2018 to limit the utilities' disconnection rates to 2017 recorded levels.¹⁷ Following a reduction in disconnection rates in 2018, SCE and PG&E continued to have lower disconnection rates in 2019, while SDG&E showed the first decline in its disconnection rate since 2012 and SoCalGas remained relatively steady at around 2%.

¹⁷ Decision 18-12-013 adopted a goal of limiting the rate of disconnections to 2017 for each utility. PU Code 910.5 Report on Residential Utility Service Disconnections – June 1, 2021



FIGURE 1: ANNUAL DISCONNECTION RATES FOR LARGE UTILITIES, 2010-2020

Historically, CARE and FERA customers have higher annual average disconnection rates compared to all other customers (including Medical Baseline). This trend continued in 2020, albeit with many fewer disconnections performed due to the disconnection moratoria. In particular, FERA customers' disconnection rates have been the highest among all customer groups for all electric utilities across most years in the previous decade. Beginning in 2017, the annual average disconnection rate of PG&E FERA customers entered a substantial decline, and the annual average disconnection rate for PG&E CARE customers exceeded FERA customers for the first time in 2019 and 2020. This trend is shown in Figure 2 below.

For SCE, all customer groups experienced a decline in disconnection rates in 2020, with the FERA and Non-CARE/FERA customers experiencing higher disconnection rates than CARE customers and all customers (Figure 3). For SDG&E, annual average disconnection rates declined in 2020 across all customer groups, but FERA and CARE customers experienced higher disconnection rates than Non-CARE/FERA customers and all customer groups overall (Figure 4). For SoCalGas, CARE customers historically had a higher annual average disconnection rate compared to all customers (Figure 5), but all customer groups experienced a significant reduction in disconnection rates in 2020.

Among all vulnerable customer groups, Medical Baseline customers experienced the lowest disconnection rates (less than 2%) over the years in every utility's territory.



FIGURE 2: PG&E'S DISCONNECTION RATES BY CUSTOMER GROUP

FIGURE 3: SCE'S DISCONNECTION RATES BY CUSTOMER GROUP





FIGURE 4: SDG&E'S DISCONNECTION RATES BY CUSTOMER GROUP



FIGURE 5: SOCALGAS'S DISCONNECTION RATES BY CUSTOMER GROUP

Growth of CCA customers

For electric service, the number of CCA customers continues to grow in California, as reported in Table 3 and Figure 6 below.

CCA disconnection rates in utilities' service territories are displayed in Figure 7. For SDG&E, because there were zero CCA customers from 2015 through 2017 in the service territory, disconnection rates could not be generated for that period and are therefore excluded from the figure. Among the utilities that provide electric service, SCE has shown the highest disconnection PU Code 910.5 Report on Residential Utility Service Disconnections – June 1, 2021

rates of CCA customers over the past five years. In 2019, CCA customers experienced lower disconnection rates in the territories of SCE and PG&E than they did in 2018, while SDG&E's CCA customers experienced a slightly higher rate in 2019.

	PG&E	SCE	SDG&E
2015	363,326	38,722	0
2016	561,068	46,273	0
2017	1,066,655	83,300	0
2018	2,144,139	106,339	6,121
2019	2,868,905	1,087,211	6,121
2020	2,930,779	1,330,717	6,126

TABLE 3: NUMBER OF CCA CUSTOMERS IN UTILITIES' SERVICE TERRITORIES

FIGURE 6: NUMBER OF CCA CUSTOMERS BY UTILITY







Payment Plans

Utilities offer payment plans to customers who have difficulty in paying their utility bills. To avoid a disconnection, customers can set up a payment plan—a payment arrangement and/or an extension—by calling the customer service center or through utility websites. The numbers of payment plans created by the utilities were steady in four of the past five years (Figure 8), but naturally have declined somewhat in 2020 as expected, due to the disconnections moratoria.¹⁸ The number of payment plans created annually by PG&E ranged from 1.4 to 1.6 million between 2016 and 2019 but fell to 866,811 in 2020. SoCalGas's payment plans were around 1 million annually from 2016 to 2019 but fell to 706,771 in 2020. SCE has created fewer payment plans since 2016 – from 678,815 in 2016 to 607,024 in 2020. The number of payment plans created by SDG&E had been steady, barely changing from the 2016 total of 373,093 before falling to 189,569 in 2020.

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¹⁸ The data on payment plans were collected from the utilities' response to an Energy Division data request issued on February 9, 2021.



FIGURE 8: NUMBER OF PAYMENT PLANS CREATED BY UTILITY

Number of Customers in Arrears

Customers are in arrears when they have an unpaid bill more than 30 days in their accounts. From 2016 to 2019, the number of customers in arrears for SCE, SoCalGas, and SDG&E had been steady (Figure 9).¹⁹ For PG&E, the number of customers in arrears increased from 2016 to 2018 before falling in 2019. In 2020, all four IOUs reported increases in the number of customers in arrears. In particular, SoCalGas reported an increase of over 1.1 million customers in arrears in 2020 compared to 2019, with a total number of customers in arrears (1,341,222), or more than 6 times the amount for 2019 (216,744). However, these numbers are not directly comparable due to the unique circumstances and emergency customer protections instituted in 2020. For 2016-2019, SoCalGas and SDG&E reported this category as the average number of customers sent late notices per month. In 2020, since late notices were cancelled for most of the year, SoCalGas and SDG&E reported the average number of customers in arrears per month, which partially account for the increases in 2020 in the chart below.

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¹⁹ The data on the number of customers in arrears were collected from the utilities' response to an Energy Division data request issued on February 9, 2021.



FIGURE 9: NUMBER OF CUSTOMERS IN ARREARS BY UTILITY

Data on IOU customer arrearages is reported monthly by IOUs pursuant to the reporting requirements established in the Interim Decision. Reports from 2020 indicate that the aggregate dollar amount of arrearages increased substantially during 2020. Approximately 45 percent of arrearages were owed by customers enrolled in CARE or FERA. Subsequent reports filed in 2021 indicated that the dollar amount of customer arrearages has continued to increase, reaching approximately \$1.3 billion at the end of February 2021.

The CPUC opened R.21-02-014 in February of 2021 to consider options for addressing these elevated levels of arrearages. The CPUC held a two-day workshop on March 25th and 26th, 2021, to solicit input from stakeholders and experts on programs assisting customers with unpaid bills. In addition, representatives from the California Department of Housing and Community Development (HCD) and California Department of Community Services and Development (CSD) were invited to present information on federally-funded programs to assist customers, including the Emergency Rental Assistance Program (ERAP), administered by HCD and LIHEAP, administered by CSD. Following the workshop, the CPUC reviewed comments by parties and has issued a Proposed Decision that is expected to be on the agenda of the July 15, 2021 CPUC voting meeting.²⁰

Total Dollar Value of Uncollectibles

A customer account that is closed with an unpaid balance or overdue for 180 days from final bill generation is deemed uncollectible. In 2020, the total dollar value of residential accounts considered

²⁰ For more information on R.21-02-014, please visit the proceeding web page at https://www.cpuc.ca.gov/General.aspx?id=6442468180

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as uncollectible following disconnection for non-payment decreased for all IOUs (Figure 10).²¹ This is due to the lower number of disconnections utilities performed in 2020 as a result of the moratorium. IOUs reported \$13.5 million in uncollectibles resulting from disconnections in 2020.



FIGURE 10: DOLLAR AMOUNT OF UNCOLLECTIBLES FOLLOWING DISCONNECTION

Since the moratorium on disconnections did not prevent utilities from writing off past-due customer bills as uncollectible, the utilities were also asked to report the total amount of residential uncollectibles written off in 2020, regardless of whether the customer was disconnected. Reported amounts are displayed on Table 4 below.

Utility	Total	CARE	FERA	Non-	Medical
				CARE/FERA	Baseline
PG&E	\$27,975,591	\$6,871,449	\$69,062	\$21,035,080	\$ 0
SCE	\$10,913,102	\$2,723,631	\$5,564	\$8,183,907	\$0
SDG&E	\$6,150,598	\$2,177,977	\$O	\$3,972,621	\$118,570
SoCalGas	\$8,180,836	\$3,686,056	\$0	\$4,494,780	\$54,682

TABLE 4: TOTAL RESIDENTIAL UNCOLLECTIBLES BY UTILITY IN 2020

Reconnections

In 2020, all IOUs had fewer reconnections than in previous years, likely attributable to the reduction in disconnections resulting from the emergency customer protections prohibiting disconnection during most of 2020. In contrast, the number of reconnections from 2016 to 2019 had been relatively steady (Figure 11).

²¹ The data sources are a data request sent by Energy Division staff on February 9, 2021.

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The CPUC has committed to hastening reconnection timelines to ensure customers receive adequate utility service, especially for gas service which requires a field visit in which the worker manually reconnects the service. In D.20-06-003, the CPUC strongly encouraged gas utilities to strive for a 90 percent reconnection rate within 24 hours.²² In recent years, the percentage of reconnections within 3 days for disconnected customers increased significantly in SoCalGas's territory from 35.6% in 2017 to 64.5% in 2019 and nearly 69.0% in 2020 (Figure 12).²³ However, we note that this rate, which is only for reconnections within 3 days, is still more than 20 percentage points below the 24-hour goal encouraged for gas utilities in D.20-06-003. Furthermore, SoCalGas reported only achieving approximately 46 percent of reconnections within 1 day.

In contrast to gas reconnections, electric reconnections are more immediate and can be restored remotely when a smart meter is installed. The CPUC strongly encouraged electric utilities to strive to reconnect 90 percent of disconnected customers within the same day. In 2020, electric utilities achieved just under 90 percent reconnection rates within 1 day (Figure 13).²⁴ While the limited data available in 2020 during which disconnections were performed makes it inadvisable to directly compare to previous years, the four IOUs collectively reported 82.4% of customers were reconnected within 1 day.



FIGURE 11: NUMBER OF RECONNECTIONS BY UTILITY

²² See D.20-06-003, page 35.

²³ The data source is a data request sent by Energy Division staff on February 9, 2021.

²⁴ The data source is a data request sent by Energy Division staff on February 9, 2021.

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FIGURE 12: SOCALGAS RECONNECTIONS, 2016-2020



FIGURE 13: NUMBER OF DISCONNECTED CUSTOMERS RECONNECTED IN 2020

Smaller Utilities' Disconnections and Reconnections

Although PU Code Section 910.5 only requires information on residential disconnections and reconnections from large utilities, disconnection information from smaller utilities is also tracked and offers important insights.²⁵ The smaller utilities are Southwest Gas Company, Liberty Utilities, Bear Valley Electric Service, Pacificorp, Alpine Natural Gas Operating Company and West Coast Gas Company. Residential disconnections in the smaller utilities' territories will be addressed in Phase I-A in the Disconnection rulemaking by considering the applicability of rules, policies, utility best practices, and programs that have been instituted for large utilities.²⁶

Disconnection Rates 2016-2020

The number of disconnections in small utilities' territories from 2016 through 2020 are presented in Table 5. Since the small utilities were also bound by the CPUC's moratoria on disconnections for nonpayment beginning in March 2020, these utilities reported substantially fewer disconnections than in previous years. Even in prior years, small utilities reported many fewer disconnections than large utilities. All small utilities have had disconnection rates lower than 5% historically.

TABLE 5 NUMBER OF DISCONNECTIONS IN SMALL UTILITIES TERRITORIES

	Alpine	West Coast		Bear		Southwest
	Gas	Gas	Liberty	Valley	PacifiCorp	Gas
2016	1	12	454	489	911	N/A

²⁵ The data request to the small utilities were sent out by Energy Division staff on February 9, 2021.

http://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=279255761

²⁶ The Scoping Memo and Ruling for Phase I-A was issued on April 5, 2019, following the prehearing conference held on March 8, 2019. For the Scoping Memo, see

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2017	3	40	425	505	626	7,860
2018	0	44	412	394	841	6,912
2019	4	33	369	817	1515	5,876
2020	N/A^{27}	14	169	25	347	1,292

Disconnections in Each Large Utility's Territory

Electric and Dual-Commodity Service

As shown in Figures 14-17, the total number of electric and dual-service disconnections in 2020 decreased across all three utilities that provide electric service. All customer subgroups showed significant declines in the number of disconnections in 2020 due to the moratorium on disconnections for nonpayment.

FIGURE 14: PG&E ELECTRIC ONLY - TOTAL RESIDENTIAL DISCONNECTIONS



PG&E Electric Only - Total Residential Disconnections

²⁷ Alpine Natural Gas did not provide responsive data for 2020.

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FIGURE 15: PG&E DUAL COMMODITY - TOTAL RESIDENTIAL DISCONNECTIONS



PG&E Dual Commodity - Total Residential Disconnections

FIGURE 16: SCE - TOTAL RESIDENTIAL DISCONNECTIONS



SCE - Total Residential Disconnections

FIGURE 17: SDG&E - TOTAL RESIDENTIAL DISCONNECTIONS





Gas Service

In Figures 18-20, total gas disconnections decreased in 2020 across all three territories that provide gas service. In 2019, the numbers of total and CARE gas disconnections both decreased approximately by 90% for PG&E compared to 2018. In SoCalGas's territory, the number of disconnections experienced by LIHEAP customers slightly increased in 2019, from 1,058 to 1,260. SDG&E's gas disconnections remain low in the recent years.

FIGURE 18: PG&E GAS ONLY - TOTAL RESIDENTIAL DISCONNECTIONS



PG&E Gas Only - Total Residential Disconnections

FIGURE 19: SOCALGAS - TOTAL RESIDENTIAL DISCONNECTIONS



SoCalGas - Total Residential Disconnections

FIGURE 20: SDG&E GAS ONLY - TOTAL RESIDENTIAL DISCONNECTIONS



SDG&E Gas Only - Total Residential Disconnections

Multiple Disconnections for Large Utilities

Electric and Dual-Commodity Service

As shown in Figures 21-24, all utilities that provide electric service reported a decline in unique households disconnected multiple times in 2020. The overall decline in multiple disconnections is likely due to the decline in total disconnections last year resulting from the disconnection moratoria.

FIGURE 21: PG&E ELECTRIC ONLY - UNIQUE CUSTOMERS DISCONNECTED MULTIPLE TIMES



PG&E Electric Only - Unique Households Disconnected Multiple Times

FIGURE 22: PG&E DUAL COMMODITY - UNIQUE CUSTOMERS DISCONNECTED MULTIPLE TIMES



PG&E Dual Commodity - Unique Households Disconnected Multiple Times

FIGURE 23: SCE UNIQUE CUSTOMERS DISCONNECTED MULTIPLE TIMES



SCE - Unique Households Disconnected Multiple Times

FIGURE 24: SDG&E ELECTRIC ONLY - UNIQUE CUSTOMERS DISCONNECTED MULTIPLE TIMES



SDG&E Electric Only - Unique Households Disconnected Multiple Times

Gas Service

Like electric customers, fewer gas customers in all three utilities experienced multiple disconnections in 2020 (Figures 25-27). These reductions were largely driven by the lower number of disconnections overall due to the moratorium on disconnections in effect for most of 2020.

FIGURE 25: PG&E GAS ONLY - UNIQUE CUSTOMERS DISCONNECTED MULTIPLE TIMES



PG&E Gas Only - Unique Households Disconnected Multiple Times

FIGURE 26: SOCALGAS - UNIQUE CUSTOMERS DISCONNECTED MULTIPLE TIMES



SoCalGas - Unique Households Disconnected Multiple Times

FIGURE 27: SDG&E GAS ONLY - UNIQUE CUSTOMERS DISCONNECTED MULTIPLE TIMES



SDG&E Gas Only - Unique Households Disconnected Multiple Times

Reconnections Across Utilities

Electric and Dual-Commodity Service

Electric reconnections decreased across all IOU territories, as with electric disconnections (Figures 31-34). These reductions were largely driven by the lower number of disconnections overall due to the moratoria on disconnections in effect for most of 2020.

FIGURE 28: PG&E ELECTRIC ONLY - TOTAL RESIDENTIAL RECONNECTIONS



PG&E Electric Only - Total Residential Reconnections

FIGURE 29: PG&E DUAL COMMODITY - TOTAL RESIDENTIAL RECONNECTIONS



PG&E Dual Commodity - Total Residential Reconnections



FIGURE 30: SCE - UNIQUE CUSTOMER RECONNECTIONS

FIGURE 31: SDG&E ELECTRIC ONLY - UNIQUE CUSTOMER RECONNECTIONS



SDG&E Electric Only - Unique Households Reconnections

Gas Service

Gas reconnections also declined in 2020 across all utilities' territories (Figures 35-37). These reductions were largely driven by the lower number of disconnections overall due to the moratoria on disconnections in effect for most of 2020.

FIGURE 32: PG&E GAS ONLY - TOTAL RESIDENTIAL RECONNECTIONS



PG&E Gas Only - Total Residential Reconnections

FIGURE 33: SOCALGAS - TOTAL RESIDENTIAL RECONNECTIONS



SoCalGas - Total Residential Reconnections

FIGURE 34: SDG&E GAS ONLY - TOTAL RESIDENTIAL RECONNECTIONS



SDG&E Gas Only - Total Residential Reconnections

Multiple Reconnections Across Utilities

Electric and dual-commodity service

Fewer households experienced multiple reconnections in 2020. These reductions were largely driven by the lower number of disconnections overall due to the moratoria on disconnections in effect for most of 2020.

FIGURE 35: PG&E ELECTRIC ONLY - UNIQUE CUSTOMERS RECONNECTED MULTIPLE TIMES



PG&E Electric Only - Unique Households Reconnected Multiple Times

FIGURE 36: PG&E DUAL COMMODITY - UNIQUE CUSTOMERS RECONNECTED MULTIPLE TIMES



PG&E Dual Commodity - Unique Household Reconnected Multiple Times

FIGURE 37: SCE - UNIQUE CUSTOMERS RECONNECTED MULTIPLE TIMES



SCE - Unique Households Reconnected Multiple Times

FIGURE 38: SDG&E ELECTRIC ONLY - UNIQUE CUSTOMERS RECONNECTED MULTIPLE TIMES



SDG&E Electric Only - Unique Households Reconnected Multiple Times

Gas Service

In all utilities' territories that provide gas service, fewer households experienced multiple reconnections in 2020 (Figures 39-41). These reductions were largely driven by the lower number of disconnections overall due to the moratoria on disconnections in effect for most of 2020.

FIGURE 39: PG&E GAS ONLY - UNIQUE CUSTOMERS RECONNECTED MULTIPLE TIMES



PG&E Gas Only - Unique Households Reconnected Multiple Times

FIGURE 40: SOCALGAS - UNIQUE CUSTOMERS RECONNECTED MULTIPLE TIMES



SoCalGas - Unique Households Reconnected Multiple Times

FIGURE 41: SDG&E GAS ONLY - UNIQUE CUSTOMERS RECONNECTED MULTIPLE TIMES



SDG&E Gas Only - Unique Households Reconnected Multiple Times

Households Not Reconnected Within 30 Days

Electric and Dual-Commodity Service

Because the three electric IOUs (PG&E, SCE, and SDG&E) close customer accounts if they have not been reconnected within 30 days, the number of customers who reconnect after 30 days is not directly tracked by the utilities. The utilities estimated this number by subtracting total reconnections from total disconnections in a year, and in some years this results in several negative values in SCE's reported data (Figure 44) and SDG&E's reported data (Figure 45).

PG&E reported fewer electric disconnections not reconnected within 30 days in 2020, except for CARE households (Figures 42 and 43). SCE reported a reduction in the number of disconnected CARE and FERA households that were not reconnected within 30 days in 2020 (Figure 44). SDG&E also reported a reduction in the number of disconnected households not reconnected within 30 days for Total, CARE, FERA, and LIHEAP customers (Figure 45). These reductions were largely driven by the lower number of disconnections overall due to the moratoria on disconnections in effect for most of 2020.

FIGURE 42: PG&E ELECTRIC ONLY - DISCONNECTIONS NOT RECONNECTED WITHIN 30 DAYS



PG&E Electric Only - Disconnections Not Reconnected within 30 Days

FIGURE 43: PG&E DUAL COMMODITY - DISCONNECTIONS NOT RECONNECTED WITHIN 30 DAYS



PG&E Dual Commodity - Disconnections Not Reconnected within 30 Days

FIGURE 44: SCE - DISCONNECTIONS NOT RECONNECTED WITHIN 30 DAYS

SCE - Disconnections Not Reconnected within 30 Days

FIGURE 45: SDG&E ELECTRIC ONLY - DISCONNECTIONS NOT RECONNECTED WITHIN 30 DAYS

SDG&E Electric Only - Disconnections Not Reconnected within 30 Days

Gas Service

All utilities reported substantially lower numbers of customers disconnected without being reconnected after 30 days in 2020 compared to 2019 (Figures 46-48).

FIGURE 46: PG&E GAS ONLY - DISCONNECTIONS NOT RECONNECTED WITHIN 30 DAYS

PG&E Gas Only - Disconnections Not Reconnected within 30 Days

FIGURE 47: SOCALGAS - DISCONNECTIONS NOT RECONNECTED WITHIN 30 DAYS

SoCalGas - Disconnections Not Reconnected within 30 Days

FIGURE 48: SDG&E GAS ONLY - DISCONNECTIONS NOT RECONNECTED WITHIN 30 DAYS

SDG&E Gas Only - Disconnections Not Reconnected within 30 Days