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Executive Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

**Subject: Comments of Pacific Gas and Electric Company on Draft Resolution
M-4849**

Dear Executive Division:

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the California Public Utilities Commission (CPUC or Commission) Executive Division's Draft Resolution M-4849 (Draft Resolution), extending the COVID-19 emergency customer protections for residential and small businesses through June 30, 2021. PG&E also appreciates the Commission's timely guidance on the extension, which provides sufficient time to coordinate with its customers and others on the extension of the customer protections beyond April 2021.

PG&E supports the Commission's efforts to assist residential and small business customers in response to the COVID-19 pandemic and requests that the Commission incorporate the following revisions to the Draft Resolution:

- PG&E requests that the Commission extend the due date of the Tier 1 Advice Letter required at the default, 12-month conclusion of the customer protection period pursuant to Decision (D.)19-07-015, Ordering Paragraph 6 to August 16, 2021 (45 days after the proposed consumer protection period end date);
- PG&E requests that the Commission clarify that the investor-owned utilities (IOUs) may continue to record incremental uncollectibles for residential and small business customers and the pro rata cost of the associated credit facilities during the COVID-19 pandemic protections period to the COVID-19 Pandemic Protections Memorandum Account (CPPMA);
- PG&E requests that the Commission clarify that the example metrics in the Draft Resolution are only illustrative and that the IOUs have the flexibility to propose different or additional metrics; and
- PG&E requests that the Commission eliminate the proposed requirement to include the number and percent of customers by zip code projected to face disconnection after June 2021 in the IOUs' transition plans.

Discussion

A. PG&E requests that the Commission extend the due date of the Tier 1 Advice Letter required at the default, 12-month conclusion of the customer protection period pursuant to D.19-07-015, Ordering Paragraph 6 to August 16, 2021

D.19-07-015, Ordering Paragraph (OP) 6 states that PG&E “shall file a Tier 1 Advice Letter at the default, 12-month conclusion of customer protection period, or as reasonably determined by the Governor’s Office of Emergency Services.”¹ The decision specifies that the Advice Letter should detail the protections required, start and end dates of the protections, outreach efforts conducted, customer impacts, and basic metrics.²

PG&E submitted Advice 4227-G/5784-E and supplements to implement customer protections in response to Governor Newsom’s March 4, 2020 declaration of a state of emergency in response to the COVID-19 pandemic. In addition, Resolution M-4842 requires PG&E to extend the COVID-19 customer protections through April 16, 2021. Furthermore, the Draft Resolution proposes to extend COVID-19 customer protections through June 30, 2021. In light of this proposed extension and the efforts required to implement the transition plans described in the Draft Resolution, PG&E requests that the Commission extend the due date of the Tier 1 Advice Letter to August 16, 2021, which is 45 days from the Draft Resolution’s proposed expiration of the COVID-19 customer protections. PG&E believes that this extension will enable PG&E to gather data for the entire period that the customer protections were in place. Given the historic and unprecedented nature of the COVID-19 pandemic, PG&E believes that providing a more complete accounting of data for the entire period as opposed to forecasted data for the final months as discussed in D.19-07-015 will be beneficial for the Commission, PG&E, and other stakeholders.³

B. PG&E requests that the Commission clarify that the investor-owned utilities (IOUs) may continue to record incremental uncollectibles for residential and small business customers and the pro rata cost of the associated credit facilities during the COVID-19 pandemic protections period to the CPPMA

The Draft Resolution directs the IOUs “to continue to use the COVID-19 Pandemic Protections Memorandum Accounts (CPPMA) established in Resolution M-4842 to record costs associated with extending the required customer protections in this Resolution and developing the Transition Plan.”⁴ In the Tier 2 Advice Letters that PG&E submitted in compliance with Resolution M-4842, the Commission authorized PG&E’s proposal to record uncollectibles expenses for residential and small businesses and the

¹ D.19-07-015, OP 6.

² D.19-07-015, OP 6.

³ In D.19-07-015, the Commission states, “we recognize that that *[sic]* certain data, including number of customers and cost, may be a forecast or contain forecast components.” For more information, see D.19-07-015, p. 40.

⁴ Draft Resolution, p. 4.

pro rata cost of the associated credit facilities, including upfront and drawn interest expense on residential and small business incremental COVID-19 related revenue shortfall to the CPPMA that were incurred during the COVID-19 pandemic protections period and incremental to the amounts authorized in the General Rate Case (GRC).⁵ However, the Draft Resolution does not specify that the IOUs are authorized to continue to record these incremental COVID-19 related uncollectibles and pro rata costs of the associated credit facilities in the CPPMA. As a result, PG&E requests that the Commission revise the Draft Resolution to clarify that it may continue to record these costs to the CPPMA through June 30, 2021.

C. PG&E requests that the Commission clarify that the example metrics in the Draft Resolution are only illustrative and that the IOUs have the flexibility to propose different or additional metrics

The Draft Resolution includes a list of ten⁶ example metrics that the IOUs could track and report monthly in support of the following two areas:

- Customers that enrolled in a bill assistance program when Emergency Customer Protections were in place are successful in sustaining their enrollment in the program if they still meet eligibility criteria; and
- Enrollments of impacted customers in new payment programs.

PG&E requests that the Commission revise the Draft Resolution to clarify that the IOUs are not *required* to necessarily track the specific example metrics and that they are illustrative only. PG&E believes that the IOUs should have the flexibility to propose metrics that are in addition to or in place of the specific metrics identified in the Draft Resolution. PG&E intends to coordinate with the other IOUs on the proposed metrics to promote consistency and to share the proposed metrics with stakeholders and Commission staff through engagement with the Low-Income Oversight Board as described in the Draft Resolution.⁷

D. PG&E requests that the Commission eliminate the proposed requirement to include the number and percent of customers by zip code projected to face disconnection after June 2021 in the IOUs' transition plans

The Draft Resolution states that the IOUs' transition plans "shall include the number and percent of customers by zip code who are projected to be facing disconnection after June 30, 2021, and compare it to the monthly disconnection cap."⁸ PG&E requests that the Commission eliminate this proposed requirement because most customers who are *eligible for the possibility of disconnection* are not at imminent risk of disconnection. In most cases, a customer may be eligible for disconnection because they have not paid

⁵ For example, see Advice 4224-G-B/5816-E-B, p. 12.

⁶ Example metrics that state "number and percent" of customers are two separate metrics.

⁷ Draft Resolution, p. 16.

⁸ Draft Resolution, p. 14.

their bill within the parameters identified in PG&E's tariffs.⁹ However, the customer may be able to pay their bill in part or in full, enter into a payment plan, or receive another form of bill payment assistance after receiving a delinquency notice. As a result, comparing the number of customers eligible for disconnection relative to actual disconnections in a given month may not provide insights as intended and could inadvertently cause confusion and result in misinterpretation. PG&E is also concerned that the Draft Resolution requires the IOUs to project the number of customers who may be eligible for disconnection months in advance of the resumption of collection activities.

Instead of requiring the IOUs to provide this data in their transition plans, PG&E believes that the existing monthly reporting requirements in R.18-07-005 provide sufficient insight into the state of customer bill payment activity and the extent to which customers may be eligible for the possibility of disconnection. This includes the number of customers receiving payment plans, extensions, and outside bill payment assistance, the number of customers disconnected each month, and the number of customers receiving notices each month, among other relevant information.

Conclusion

PG&E appreciates the opportunity to submit these comments to the Draft Resolution and requests that the Commission revise the Draft Resolution in accordance with the recommendations presented herein.

Respectfully submitted,

/S/

Erik Jacobson

Director, Regulatory Relations

cc:

Rachel Peterson, Executive Director, Executive Division

April Mulqueen, Senior Regulatory Analyst, Executive Division

Service List R.18-03-011, A.20-03-014, A.19-09-014, R.18-07-006, R.18-07-005,
R.18-03-011, R.17-06-024, R.15-03-010, R.12-06-013.

⁹ For more information, see Electric and Gas Rule 8 and 11.