

January 29, 2021

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

Subject: Reply to 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 respond to opening comments submitted by parties on January 22, 2021 in response to the California Public Utilities Commission (CPUC or Commission) Executive Division's Draft Resolution M-4849 (Draft Resolution), which extends the COVID-19 emergency customer protections for residential and small businesses through June 30, 2021.

Discussion

A. PG&E agrees that all protections previously authorized by the Commission through April 16, 2021, should be extended through June 30, 2021

The California Community Choice Association (CalCCA) recommends that all existing protections authorized by the Commission through April 16, 2021 should continue through June 30, 2021.¹ PG&E agrees with CalCCA and intends to extend all existing protections for residential and small business customers. This includes the protections adopted in Resolution M-4842 (e.g. suspending disconnections, supporting low-income residential customers, offering flexible payment plans, etc.) as well as the *pro rata* allocation of partial payments received from residential customers served by a third-party service provider.

PG&E believes that extending these protections aligns with the Commission's stated goal of ensuring "continued continuity and consistency between all utility actions resulting from the ongoing COVID-19 pandemic."² Accordingly, PG&E intends to submit revised tariff sheets to reflect these extensions in the Tier 1 Advice Letter that PG&E will submit 10 days following approval of the Draft Resolution.

B. PG&E disagrees with the Joint Consumers' recommendation to adjust the methodology for the monthly disconnection cap

The Utility Reform Network, National Consumer Law Center, and Center for Accessible Technology (Joint Consumers) claim that the monthly disconnection cap methodology

¹ CalCCA Opening Comments, p. 1.

² Draft resolution, p. 3.

adopted in D.20-06-003 will enable the IOUs to conduct nearly a year's worth of disconnections within a single month following the expiration of customer protections.³ As a result, the Joint Consumers recommend that the Commission clarify that the disconnection cap in place for July 2021 will be calculated either using 11 months of data starting from March 2020 and prior (Option A) or assuming that the IOUs had conducted 1/12 of the number of disconnections authorized under its disconnection cap for each month (Option B).⁴

PG&E disagrees with the Joint Consumers' claim that it is necessary to adjust the methodology for the monthly disconnection cap.

First, PG&E believes it is unnecessary to adjust the methodology for the monthly disconnection cap because it will work with residential customers as part of its transition plan to mitigate the number of disconnections that may occur following the expiration of the moratorium. PG&E views disconnection due to non-payment as a last resort and intends to work with customers that have arrears to increase awareness of available assistance programs, including the new Arrearage Management Program (AMP).

Second, PG&E clarifies that the policies adopted in D.20-06-003 preclude the IOUs from potentially disconnecting customers *en masse* as described by the Joint Consumers. For example, PG&E must offer all residential customers a 12-month payment plan prior to disconnection and cannot disconnect any customer that is enrolled/current on their payment plan.⁵ In addition, PG&E is prohibited from disconnecting customers until they are enrolled in all applicable benefit programs.⁶ PG&E also points out that the Draft Resolution extends the moratorium on disconnections into the summer months and PG&E is prohibited from disconnecting any residential customers if temperatures are forecasted above 100 degrees based on a 72-hour look ahead.⁷

Third, PG&E recommends that the Commission not consider adjusting the methodology for the monthly disconnections cap in this proceeding because it was established in R.18-07-005 through D.20-06-003. To the extent that the Joint Consumers believe the methodology for the monthly disconnections cap should be modified, PG&E believes that a petition for modification to D.20-06-003 would be required.

Conclusion

PG&E appreciates the opportunity to submit these comments to the Draft Resolution and for the Commission's ongoing efforts to support customer impacted by the COVID-19 pandemic.

³ Joint Consumers Opening Comments, p. 9.

⁴ Joint Consumers Opening Comments, p. 10.

⁵ D.20-06-003, OP 1d.

⁶ D.20-06-003, OP 1c.

⁷ D.20-06-003, OP 1f.

