

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
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December 5, 2018

**Advice Letter 5385**

Ronald van der Leeden  
Director, Regulatory Affairs  
Southern California Gas  
555 W. Fifth Street, GT14D6  
Los Angeles, CA 90013-1011

**SUBJECT: Implementation of Emergency Disaster Relief Program for Hill and Woolsey  
Wildfire Victims Pursuant to Decision 18-04-004**

Dear Mr. van der Leeden:

Advice Letter 5385 is effective as of November 9, 2018

Sincerely,

A handwritten signature in black ink that reads "Edward Randolph".

Edward Randolph  
Director, Energy Division



**Ronald van der Leeden**  
Director  
Regulatory Affairs

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November 26, 2018

Advice No. 5385  
(U 904 G)

Public Utilities Commission of the State of California

**Subject: Implementation of Emergency Disaster Relief Program for Hill and Woolsey Wildfire Victims Pursuant to Decision 18-08-004**

### **Purpose**

Pursuant to California Public Utilities Commission (Commission or CPUC) Decision (D.)18-08-004, Southern California Gas Company (SoCalGas) hereby submits this Advice Letter (AL) to implement emergency customer protections for residential and small business customers impacted by the Hill and Woolsey fires in the Los Angeles and Ventura counties. This submittal implements emergency residential and non-residential customer protections for SoCalGas customers impacted by the wildfires, in accordance with D.18-08-004 as well as associated fire-related impact (e.g., resulting floods, mudslides, debris flow).

### **Background**

In October 2017, California experienced major wildfires that gravely impacted the lives of many residents and affected multiple utility services across the state. To assist utility customers affected by the devastation, destruction, and disruption caused by these fires, the Commission swiftly adopted Resolutions (Res.) M-4833 and M-4835. Res. M-4833 and M-4835 require electric, gas, telephone, water and sewer utilities to take reasonable and necessary steps to assist Californians who experienced housing or financial crises due to the series of devastating wildfires in Northern and Southern California.

In March 2018, the Commission initiated Rulemaking (R.)18-03-011 to consider whether the Commission should adopt permanent rules requiring all electric, gas, telephone, water and sewer utilities under the Commission's jurisdiction to make available comparable post-disaster customer protection measures to Californians in the event certain types of emergency disaster declarations are pronounced. In August 2018, the Commission adopted D.18-08-004 which concluded that the provisions of Res. M-4833 and M-4835 are the controlling interim authority and shall remain in effect should a disaster occur that

affects utility service prior to the conclusion of R.18-03-011. These interim protections are in effect upon a declaration of a state of emergency by the Governor of California where the disaster either: (1) resulted in the loss or disruption of the delivery or receipt of utility service; and/or (2) resulted in the degradation of the quality of utility service. The period for which the protections apply are consistent with Res. M-4833 and M-4835 (i.e., during the period of time the home/unit could not be occupied), or until utility service is restored. The customers covered by these protections are those affected in the counties declared in the Governor's state of emergency.<sup>1</sup>

Consistent with Res. M-4833 and M-4835, the protections put into effect upon a declaration of a state of emergency for electric and gas residential and non-residential (small business) utility customers are:

1. Waive deposit requirements for affected residential customers seeking to reestablish service for one year and expedite move-in and move-out service requests;
2. Stop estimated energy usage for billing attributed to the time period when the home/unit was unoccupied as a result of the emergency;
3. Discontinue billing;
4. Prorate any monthly access charge or minimum charges;
5. Implement payment plan options for residential customers;
6. Suspend disconnection for non-payment and associated fees, waive deposit and late fee requirements for residential customers;
7. Support low-income residential customers by: (a) freezing all standard and high-usage reviews for California Alternate Rates for Energy (CARE) program eligibility in impacted counties until at least the end of the year and potentially longer, as warranted; (b) contact all community outreach contractors, the community based organizations who assist in enrolling hard-to-reach low-income customers into CARE, in impacted counties to help better inform customers of these eligibility changes; (c) partner with the program administrator of the customer funded emergency assistance program for low-income customers and increase the assistance limit amount for the next 12 months for impacted customers; and (d) indicate how the Energy Savings Assistance (ESA) Programs can be deployed to assist impacted customers;
8. Track costs in a memorandum account; and
9. Follow the requirements that were stipulated for non-residential customers in Res. M-4833 and M-4835.

In addition, the Commission emphasized in D.18-08-004 that these protections are "minimum, interim customer protections to ensure continuity and establish a baseline minimum response across the Commission's regulated entities" and encouraged the

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<sup>1</sup> D.18-08-004 at 5.

utilities to provide additional support to customers in addition to what is ordered in the decision.

### **Estimated Wildfire Impact and Eligible Customers**

On November 8, 2018, several wildfires erupted across the State. According to Cal Fire, the Hill and Woolsey wildfires impacted communities in the counties of Los Angeles and Ventura. Acting Governor Gavin Newsom issued an emergency proclamation for Los Angeles and Ventura counties due to the effects of the Hill and Woolsey fires on November 9, 2018. Pursuant to D.18-08-004, SoCalGas will provide residential and small business customers affected by the Hill and Woolsey fires customer protections consistent with Res. M-4833 and M-4835 where the fires have either: 1) resulted in the loss or disruption of the delivery or receipt of natural gas service; and/or 2) resulted in the degradation of the quality of natural gas service. Pursuant to D.18-08-004 Ordering Paragraph (OP) 2, utilities are required to file an advice letter implementing the above customer protections within 15 days of the Governors declaration of a state of emergency, which is November 26, 2018.

### **Eligibility Requirements for Emergency Customer Protections**

SoCalGas will work with the appropriate local fire and County agencies to identify and verify homes and small businesses that were destroyed or damaged as a result of the Woolsey and Hill wildfires. SoCalGas' field staff will conduct field verifications to validate the information and place each home or small business in one of the two following eligible categories:

- Homes or small businesses destroyed by the fire – These homes and small businesses will be considered a total loss and the account will be flagged in SoCalGas' Customer Information System as eligible for protections outlined in the Resolutions. These accounts will remain flagged until these customers establish a replacement residence or small business through November 9, 2019, or as otherwise specified or extended by order of the Commission.
- Homes or small businesses damaged by the fire – These homes or small businesses are not considered a total loss but suffered damage due to the fire. The accounts will also be flagged in SoCalGas' Customer Information System and will be eligible for protections outlined in the Resolutions.

### **Description of Adopted Consumer Protections**

In the following section, SoCalGas describes the implementation of each of the residential and non-residential customer protections identified in Res. M-4833 and M-4835. Unless otherwise noted, each of these customer protections are applicable to both residential and small business customers and are effective through November 9, 2019.

*Waive Deposit Requirements*

Res. M-4833 and M-4835 direct utilities to waive deposit requirements for eligible customers seeking to reestablish service.

SoCalGas does not require a customer with a satisfactory credit rating to pay a deposit. SoCalGas will waive any deposit that would otherwise be collected to activate new service, one time per eligible customer, after the initial fire-related cessation of service. SoCalGas will waive the deposit requirement for eligible customers requesting to reestablish service through November 9, 2019, at either the same or a new location.

*Expedite Move-in and Move-out Service Requests*

Res. M-4833 and M-4835 direct utilities to initiate best efforts to expedite move-in and move-outs to support Californians returning to their homes and establishing service in new locations, and to ensure that utility staff monitor and track the time from when service requests are submitted to the utility to when services are provided to residential customers.

When eligible customers notify SoCalGas that they are relocating to another residence due to damage to their home, SoCalGas will attempt to activate service to residential customers on the requested day.

*Stop Estimated Energy Usage Billings*

Res. M-4833 and M-4835 direct utilities to recalibrate their approach for estimating energy usage to account for reduced consumption during the period of time the home or unit was unoccupied as a result of the wildfires.

SoCalGas will make an attempt to use actual reads to bill all customers within the wildfire zones. SoCalGas has installed advanced meter modules to collect reads for most meters in its service territory. All customers within the wildfire zones with communicating advanced meter devices will be billed using the actual reads from the meter. SoCalGas will also attempt to collect an actual read for the other customers who do not have meters with advanced meter modules. Only if an actual read is not available will SoCalGas need to estimate a customer's usage. SoCalGas will review any estimated bills before they are issued and make necessary corrections so that the estimated usage reflects reduced consumption during the period of time the home or unit may have been unoccupied as a result of the fires or resulting fire-related impact.

*Waive Disconnection Charges*

Res. M-4833 and M-4835 direct utilities to identify the premises of eligible customers that are not capable of receiving utility services and discontinue billing to these premises without assessing a disconnection charge.

SoCalGas will close eligible customers' accounts as of November 9, 2018 for customers whose residential or non-residential unit is destroyed or damaged and uninhabitable. SoCalGas does not assess any access or minimum charges on closed accounts. SoCalGas will review residential customer accounts for possible bill forgiveness. SoCalGas will also fully refund any existing deposit on the account after forgiving any bills. SoCalGas does not currently assess a disconnection charge. In addition, eligible customers disconnected due to the fires will not be charged a reconnection charge.

#### *Prorate Monthly Access or Minimum Charges*

Res. M-4833 and M-4835 direct utilities to prorate any monthly access charge or minimum charges typically assessed, so that eligible customers do not bear these costs for the time period after the customer's home was rendered unserviceable by the fires.

SoCalGas will temporarily suspend billing for all eligible customers whose service is interrupted until service has been restored, thus waiving minimum and all other charges for the time period that the customer's unit was without gas service.

#### *Implement Payment Plan Options*

Res. M-4833 and M-4835 direct utilities to implement the following payment plan options for affected customers:

- For eligible customers who have prior arrearages and have lost their homes or have been displaced and are seeking to establish service in a new residence, offer a payment plan with an initial payment of no greater than 20 percent of the amount due, and with equal installments for the remainder of not less than twelve billing cycles.
- For eligible customers who currently have service but go into arrearage after November 9, 2019, offer a payment plan with an initial payment of no greater than 20 percent of the amount due, and with equal installments for the remainder of not less than eight billing cycles.
- Any eligible customer offered a payment plan will not be precluded from paying off an arrearage more quickly.

SoCalGas will review the accounts of residential eligible customers to forgive outstanding balances when SoCalGas issues the closing bills for customers whose residences are physically destroyed or damaged by the fires. SoCalGas will extend the payment plan options as directed for any amounts that do not qualify for bill forgiveness.

For other eligible customers with service who request additional grace period for payment, SoCalGas will offer payment plan options as directed for any amount up to the total outstanding balance on the account.

SoCalGas does not preclude any customer from paying off an installment payment plan more quickly.

#### *Suspend Customer Disconnections for Non-Payment and Associated Fees*

Res. M-4833 and M-4835 direct utilities to suspend disconnection for non-payment and associated fees for eligible customers, waive the deposit and late fee requirements for eligible customers who pay their utility bills late, and not report late payments by residential customers, who are eligible for these protections, to credit reporting agencies or to other such service providers.

SoCalGas will suspend all collections activity for all customers in the wildfire evacuation zones through January 7, 2019. SoCalGas will not disconnect customers whose homes were damaged or destroyed by the wildfires through November 9, 2019. SoCalGas does not charge late fees to residential customers and SoCalGas will waive late fees assessed to affected small business customers. SoCalGas does not report delinquent accounts to credit reporting agencies or to other such service providers. SoCalGas will not request a new or additional deposit from affected customers that may otherwise result from late payment.

#### *Support Low-Income Residential Customers*

Res. M-4835 sets forth the following requirements relating to low-income customer protections:

- Freeze all standard and high-usage reviews for CARE program eligibility in impacted counties until at least the end of the year, and potentially longer as warranted; and
- Contact the community-based organizations who assist in enrolling hard-to-reach low-income customers into CARE, in impacted counties to help better inform customers of these eligibility changes.
- SoCalGas' ESA Program will leverage the outreach efforts described above and below to provide information about the program's benefits to customers impacted by the wildfires.

CARE customers directly affected by the wildfires will not be subject to eligibility verification until November 9, 2019, unless further extended by SoCalGas or the Commission.

SoCalGas works with forty different Community-Based Organizations (CBOs) and outreach agencies located throughout the SoCalGas service territory and employs various types of outreach strategies, such as local community event participation, walk-in enrollment, and program material distribution to enroll customers. SoCalGas will employ the services of CBOs and Faith-Based Organizations (FBOs) to reach eligible customers.

CBO and FBOs serve as trusted sources of information on SoCalGas' Customer Assistance Programs and will provide the community with information on enrollment and how to benefit from these programs. The representatives of these agencies are trained to follow up with callers on these programs, as they also serve as a crisis information helpline. Additionally, SoCalGas will provide lists targeting the fire impacted area for door-to-door canvassers. SoCalGas' Regional Public Affairs and Community Relations personnel will also meet with various community groups on an ongoing basis to promote awareness of Customer Assistance Programs in the areas impacted by the wildfires. SoCalGas will also coordinate with shelters and temporary relocation entities to inform residents about the low-income CARE and ESA Programs and provide assistance with the application process.

### **Communications Plan**

SoCalGas will communicate the availability of emergency customer protections to customers in the impacted service territory using one or more communication channels that may include (but is not limited to) community outreach, web pages, outbound emails, media advisories, social media posts, outbound dialing, and SMS text messaging. The communications channels used will be determined by various factors including size of impacted area, location, number of impacted residents, types of structures, remaining infrastructure, etc. SoCalGas will direct the customers to SoCalGas' Customer Contact Center, 800-427-2200 and to the SoCalGas website for further assistance. A complete explanation of the protections available will be located on SoCalGas' website at <https://www.socalgas.com/billing-support>

### **Emergency Customer Protections Memorandum Account**

SoCalGas will record costs associated with the protections described herein in the Emergency Customer Protections Memorandum Account (ECPMA). The costs recorded to this memorandum account will be incurred beginning November 9, 2018, which is the start date of Governor's emergency proclamation. Pursuant to the Resolutions, SoCalGas will seek recovery of these costs in a General Rate Case or other appropriate ratemaking proceeding.

### **Protest**

In accordance with GO-96 B, General Rule 6.2, this information-only AL is not subject to protest.

### **Effective Date**

This submittal is subject to Energy Division disposition and should be classified as Tier 1 (effective after approval) pursuant to OP 2 of D.18-08-004. Therefore, SoCalGas respectfully requests that this submittal be approved and made effective November 9, 2018, which is the start date of the Governor's emergency proclamation.



**Notice**

A copy of this AL is being sent to SoCalGas' GO 96-B service list and the Commission's service lists for A.14-11-004, A.14-12-017, A.15-04-012, A.15-06-020, A.15-07-014, A.15-09-010, A.17-01-013, I.17-02-002, I.17-03-002, and R.18-03-011. Address change requests to the GO 96-B service list should be directed via e-mail to [Tariffs@socialgas.com](mailto:Tariffs@socialgas.com) or call 213-244-2837. For changes to all other service lists, please contact the Commission's Process Office at 415-703-2021 or via e-mail at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).

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Ronald van der Leeden  
Director – Regulatory Affairs

Attachments



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person:

Phone #:  
E-mail:  
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas      WATER = Water  
PLC = Pipeline      HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type:  Monthly     Quarterly     Annual     One-Time     Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested?  Yes     No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required?  Yes     No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets:

<sup>1</sup>Discuss in AL if more space is needed.

**Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:**

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Name:  
Title:  
Utility Name:  
Address:  
City: State:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

Name:  
Title:  
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