

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



Southern California Gas Company
GAS (Corp ID 904)
Status of Advice Letter 5676G
As of October 6, 2021

Subject: Revisions to Medical Baseline Program Requirements Pursuant to Decision (D.) 20-06-003

Division Assigned: Energy

Date Filed: 08-17-2020

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Signed

Effective Date:

09-23-2021

Resolution Required: Yes

Resolution Number: E-5169

Commission Meeting Date: None

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PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
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To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov



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August 17, 2020

Advice No. 5676
(U 904 G)

Public Utilities Commission of the State of California

Subject: Revisions to Medical Baseline Program Requirements Pursuant to Decision (D.) 20-06-003

Purpose

Southern California Gas Company (SoCalGas) hereby submits this Advice Letter (AL) to notify the California Public Utilities Commission (CPUC or Commission) of SoCalGas's implementation of the applicable Medical Baseline (MBL) program requirements in compliance with Decision (D.) 20-06-003.

Pursuant to Ordering Paragraphs (OPs) 38, 39, 40, and 41 of D.20-06-003, this submittal: (1) details SoCalGas's marketing and outreach plan to persons eligible for the MBL program; (2) implements requirements to allow additional qualified medical professionals to complete applications for the MBL program; (3) demonstrates SoCalGas's plan to allow a qualified medical professional to e-sign applications for the MBL program; (4) details SoCalGas's funding plan for outreach programs and Community Based Organizations (CBOs) that are promoting the MBL program; and (5) outlines SoCalGas's enrollment goals and metrics of customers reached and enrolled in the MBL program.

Background

The MBL program is designed to assist residential customers with special energy needs due to qualifying medical conditions.

On September 28, 2017, Governor Brown signed Senate Bill (SB) 598 into law. SB 598 acknowledges that disconnections of gas and electric utility customers have been rising and notes the public health impacts in terms of hardship and stress resulting from

disconnections, especially among vulnerable populations.¹ In addition to requiring an overall reduction in disconnection rates, SB 598 created protections for customers for whom disconnection would be life-threatening. Specifically, SB 598 prohibits gas or electric corporations from disconnecting customers who utilize a medical baseline allowance, are financially unable to pay, agree to a payment plan, and either are under hospice care, on life-support equipment, or diagnosed with a life-threatening condition that makes utility service medically necessary.²

On September 18, 2018, Governor Brown signed SB 1338 into law, authorizing a physician assistant (PA) to certify in writing to the utility that that an individual has a medical condition which substantiates the need for a medical baseline allowance.³ The bill also requires the four large Investment Owned Utilities (IOUs) to demonstrate that they are working with the medical community to increase marketing and outreach to persons eligible for the medical baseline allowance.⁴

On June 11, 2020, the Commission approved D.20-06-003, adopting rules and other changes applicable to the IOUs designed to reduce the number of residential customer disconnections and improve reconnection processes for disconnected customers. D.20-06-003 adopts and makes permanent with modifications the interim rules from D.18-12-013 and implements additional programs and protections aimed at reducing residential customer disconnections. In addition to implementing the changes set forth in SB 1338, allowing PAs to certify customers for MBL, D.20-06-003 also revises the MBL program so that PAs and nurse practitioners (NPs) can certify eligibility for MBL enrollment.⁵ D.20-06-003 further directed utilities to implement a system that will allow qualified medical professionals to electronically certify that a customer is eligible for the MBL program.⁶ Additionally, in OP 39 of D.20-06-003, the Commission directed IOUs to submit a Tier 3 AL within 60 days outlining plans for implementing SB 1338 requirements to allow additional qualified medical professionals to complete and e-sign applications for the MBL program, include enrollment goals and other metrics, and include the number of customers reached and enrolled in the MBL program.⁷

The IOUs' MBL programs offer assistance to residential customers who rely on electricity and/or natural gas energy-fueled medical equipment for certain medical conditions. There are two major differences between the higher numbers of customers dependent on electricity to power life-support equipment in their homes, such as respirators or kidney dialysis machines, and customers who require additional natural gas to provide sustained heating. The primary difference is virtually all life-support equipment is dependent on electricity alone. Secondly, electricity to fuel life-support equipment is not a seasonal

¹ See SB 598, Section 1.

² *Id.*, Section 3.

³ See SB 1338, Section 2(a)(3).

⁴ *Id.*, Section 3(b).

⁵ See D.20-06-003 at OP 34.

⁶ *Id.* at OP 35.

⁷ *Id.* at OP 39.

commodity, but in most cases, a year-round necessity for customers in need. While some gas customers with extreme medical conditions may require additional natural gas heating year-round, most are dependent on sustained heating during the colder weather months only.

SoCalGas recognizes the number of natural gas customers enrolled in its MBL program will always be less than customers who must rely on electricity to fuel life-sustaining medical equipment. Nonetheless, SoCalGas is committed to building awareness of its MBL program to help its eligible customers learn about the MBL program, enroll, and receive additional natural gas heating that is vital to managing their health, and helping them save money. This is something that is especially relevant during this challenging socioeconomic and health sensitive COVID-19 pandemic landscape.

SoCalGas continues its commitment to complying with directions from the Commission to support customers who have special energy needs due to qualifying medical conditions.

Discussion

1. Proposed Marketing and Outreach Plan

SoCalGas is proactively planning its upcoming cold weather campaign (typically November-March), with the goal to commence in the fourth quarter of 2020. SoCalGas remains mindful of the significant hurdles the unprecedented pandemic has brought about and will continue to prepare to pivot and adjust timing and planning as necessary. SoCalGas respectfully reserves the right to alter its marketing campaign timing based on the current pandemic and other unforeseen factors. SoCalGas's 2020-2023 campaigns will likely be planned to commence during the colder weather months for greatest impact, relevancy, and service to its customers. SoCalGas plans to implement a comprehensive multi-channel, multi-language mass media campaign to increase awareness of the MBL program with the following campaign objectives for 2020:

- Educate and generate awareness of MBL to target audiences
- Drive traffic to SoCalGas's MBL landing page to further educate and encourage customers to apply
- Create and build awareness of MBL among medical professionals (including those newly authorized to certify customers' eligibility)

a) Target Audiences

Customers

SoCalGas's target audience includes customers residing in SoCalGas's service territory with qualifying medical conditions that require natural gas heating to sustain health and comfort. At this time, targeted customer demographics will include general market, African Americans, and Hispanics. This will include a broad age range with an increased focus on

elderly customers with more serious health conditions. Additionally, several qualifying medical conditions for enrollment in MBL have a female skew and certain conditions appear to be more prevalent among specific ethnic groups. To address this, gender, ethnicity, and language will also be factored into targeted segments and messaging strategies. SoCalGas also plans to increase awareness and enrollment in the MBL program through outreach to senior communities.

Caregivers

SoCalGas's target audience includes family members, or others, living in the household, providing care to the customer as well as in-home care nurses.

Medical Community

SoCalGas's target audience includes members of the medical community, including Medical Doctors (MD) and new categories of medical personnel now authorized to certify customers for the MBL program. These include Doctors of Osteopathy (DOs), PAs and Nurse Practitioners (NPs).

County Public Health Offices

SoCalGas's target audience includes county public health offices, including but not limited to In-Home Support Services (IHSS), Department of Aging, Department of Public Social Services, that coordinate and assist communities they serve with local public health services.

Health Care Non-Profit Organizations

SoCalGas's target audience includes support organizations for persons with serious health conditions such as the Scleroderma Foundation and Multiple Sclerosis Foundation.

b) Paid Media

SoCalGas's campaign during the winter timeframe will reach customers and patient caregivers using a mix of high reach and frequency media channels such as local television, radio, print, digital channels, search and social media to drive efficient traffic to SoCalGas's MBL webpage.

Starting in program year (PY) 2020, SoCalGas will utilize a mix of print collateral and digital advertising campaign to:

- Reach consumers in highly visited medical offices and pharmacies
- Extend doctors' office communications to physicians via direct messaging
- Distribute complimentary information to MDs, DOs, PAs and NPs, County Public Health Offices, and Support organizations

c) Owned Media

SoCalGas will continue focused messaging through owned media channels to reach out to patients and caretakers via direct mail, e-mail, text messages, bill inserts, SoCalGas's MBL webpage, and by cross promotion with other assistance programs such as the California Alternate Rate for Energy (CARE) and Energy Savings Assistance (ESA) Programs.

d) Earned Media

SoCalGas also plans to target patients and caretakers in its earned media efforts by leveraging CBOs social media channels and providing content for them to post on their respective pages and channels.

SoCalGas will develop and utilize the following metrics to track the success of its marketing activities:

Activity	Purpose	Tracking
Local TV and Radio	Broad awareness	Impressions, total spots aired
Digital media	Broad awareness	Total impressions, web page traffic, click-through-rates (CTRs)
Search advertising	Broad awareness	Impressions, CTRs
Social Media	Broad and targeted awareness	Comments, likes, shares, mentions, CTRs
Direct Mail	Targeted awareness	Customers reached/total send
Email	Targeted awareness, educate, Call to Action for recipient	Open-rate, CTR
Text	Targeted awareness	Customers reached/total send
MBL Webpage	Program Info and application	Bounce rate, application download completions
SoCalGas Homepage	Tool	CTR (to MBL page)
Cross Promotions -CARE Email	Leveraging Opportunity	CTR (MBL static banner)
Print	Broad and targeted awareness	Total distributed
Outreach Brochures	Targeted awareness, in-language collateral	Total distributed and application source code

The MBL webpage has a unique uniform resource locator (URL): socialgas.com/medical which is highlighted in various marketing materials, and is also easily accessible from the SoCalGas homepage, under the *Save Money & Energy* menu, followed by *Assistance Programs*. The MBL webpage and applications will also continue to be compliant with the Web Content Accessibility Guidelines (“WCAG”) 2.0 at Level AA standards. SoCalGas ensures the forms have embedded text for each form input box that screen reader apps read aloud to visually impaired or limited-vision users. Every form can be navigated and submitted without a mouse. The contrast ratio between any text and form page backgrounds is large enough so visually impaired users can distinctly read form labels and any other descriptive text. Any updates and translations made to program information is vetted through qualified, in-language translators to help simplify messaging and account for cultural relevancy.

e) Outreach

In addition to community outreach activities with CBOs, SoCalGas will leverage its existing relationships with various community partners connected to CARE and ESA, to promote Medical Baseline enrollment. In addition, SoCalGas will explore partnerships with medical providers, such as Los Angeles Care, CareMore, Alt Med, Molina Healthcare, Kaiser Permanente, and Inland Empire Health Plan (IEHP).

SoCalGas’s partnerships with CBOs and faith-based organizations (FBOs) has historically been a significant component of SoCalGas’s outreach plans for promoting its Customer Assistance Programs. These partnerships have proven to be extremely vital in providing information to its customers. SoCalGas’s experience has been that CBOs are trusted resources within their communities, and they are instrumental in collaborating with SoCalGas to help reach its most vulnerable customers. SoCalGas plans to increase and strengthen existing relationships with key CBOs and FBOs.

In 2019, SoCalGas participated in over 750 local community events in its service territory. Due to the current pandemic, public events are occurring less, and that is expected for the remainder of 2020. Once outdoor outreach events resume, these events will be a primary focus in SoCalGas’s outreach plan. In 2019, SoCalGas partnered with over 20 CBOs spanning its entire service territory, covering over 12 counties throughout Southern California. SoCalGas will explore expanding its partnerships which align with SoCalGas’s customers’ needs and provide the opportunity to disseminate information to help increase MBL enrollment.

SoCalGas has existing relationships with 12 counties in its service territory. SoCalGas will explore leveraging those relationships to expand outreach among county health workers and provide outreach and training on programs as necessary. MBL marketing and outreach collateral materials are offered in English and Spanish, and SoCalGas will strategically look at adding additional languages as needed and necessary to align with the needs of customers representative of its service territory.

SoCalGas will provide relevant training to its partnering organizations on the MBL program as well as work with medical facilities such as community hospitals, clinics, and medical providers such as LA Care, Altamed Health Services, Care More, IEHP, Molina, and Kaiser Permanente, so they are aware of the program. Conversations with medical providers will begin in the third quarter of 2020 for scheduling, and training to commence in the fourth quarter into the first quarter of 2021. Medical providers will receive training on a bi-annual basis on SoCalGas customer assistance programs including MBL with ongoing check-ins with staff.

CBOs are currently able to register as CARE capitation agencies to conduct CARE outreach and assist with new CARE enrollments funded in CARE. In addition, the Community Help and Awareness of Natural Gas and Electric Services (CHANGES) program, also funded by CARE, has a wide network of CBOs assisting customers with enrollment in assistance programs, and ensuring eligible households are enrolled in all applicable benefit programs. Medical baseline is one of those programs covered by CHANGES.

As part of a general outreach partnership with CBOs, SoCalGas provides a monthly financial award to organizations under a memorandum of understanding. The role of the CBOs under these partnerships is to provide awareness and outreach on SoCalGas's Customer Assistance Programs to the clients they serve. Awards vary based on scope and reach of the customer base they serve. As noted above, SoCalGas currently partners with over 20 CBOs, and will explore adding additional partnerships which align and provide the opportunity to help increase enrollment for MBL.

SoCalGas is open to piloting an expanded capitation program for CBOs which would allow them to register as capitation agencies to conduct outreach, assist with enrollment, and ensure eligible households are enrolled in all applicable benefit programs. SoCalGas would like to note, in the company's experience, there is an administrative burden on the CBO as a capitation agency which makes it less appealing to them, compared to a general outreach partnership where organizations are providing awareness on all the customer assistance programs that the utility offers.

2. Additional Qualified Medical Professionals

On January 31, 2020, SoCalGas submitted AL 5576-A, *Supplement - Revisions to the Medical Baseline Program Requirements Pursuant to Senate Bill 1338*, to allow NPs and PAs to certify MBL Allowance applications.⁸ The plan became effective February 27, 2020. SoCalGas currently accepts MBL applications signed by qualified medical professionals as outlined in SB 1338.

⁸ AL approved by the Energy Division with an effective date of February 27, 2020.

3. Electronic Signature for Medical Providers

Since 2009, medical professionals have submitted their e-signed application to SoCalGas via email, facsimile, or postal mail. SoCalGas will continue to accept electronically signed applications and intends to explore the capabilities of existing technology within the company in order to expand the modalities in which e-signatures are accepted.

4. Enrollment Goals and Metrics

Program Forecast and Enrollment Goals:

D.20-06-003 provides guidance for the IOU Medical Baseline program enrollments goals, stating “[u]ltimately, the IOUs should strive to increase enrollment in the medical baseline program above 2018 levels.”⁹ SoCalGas proposes a goal structure where, by the end of 2020, through effective marketing and outreach efforts described in this AL, SoCalGas will strive to enroll eligible customers to reach 2018 enrollment levels. In 2018, SoCalGas enrolled 30,275 customers in the MBL program. After 2020, SoCalGas proposes to increase its enrollment goals each year by 3 percent cumulatively year-over-year through the end of 2023.¹⁰

Program Year	Household Enrollments	Annual Percentage Increase
2020	30,275 ¹¹	n/a
2021	31,183	3%
2022	32,119	3%
2023	33,082	3%

Residential Disconnection Protections Memorandum Account (RDPMA)

SoCalGas will record incremental costs associated with the funding outreach programs related to MBL outreach. The costs recorded into this memorandum account will be incurred beginning June 16, 2020, which is the issuance date of D.20-06-003. SoCalGas will seek recovery of these costs in a General Rate Case or other appropriate rulemaking proceeding.

Protests

Anyone may protest this AL to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be

⁹ D.20-06-003 at 78.

¹⁰ At the recommendation of Energy Division, SoCalGas has provided quantitative MBL forecast and goals, which is subject to change based on the current pandemic and other unforeseen factors.

¹¹ 2020 MBL customer enrollment based on 2018 enrollment levels.

submitted expeditiously. The protest must be made in writing and received within 20 days of the date of this AL, which is September 6, 2020. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division
Attn: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the Energy Division Tariff Unit (EDTariffUnit@cpuc.ca.gov). Due to the COVID-19 pandemic and the shelter at home orders, SoCalGas is currently unable to receive protests or comments to this AL via U.S. mail or fax. Please submit protests or comments to this AL via e-mail to the address shown below on the same date it is mailed or e-mailed to the Commission.

Attn: Ray B. Ortiz
Tariff Manager - GT14D6
555 West 5th Street
Los Angeles, CA 90013-1011
Facsimile No. (213) 244-4957
E-mail: ROrtiz@socalgas.com

Effective Date

OP 39 of D.20-06-003 directs SoCalGas to submit this AL as Tier 3 pursuant to General Order (GO) 96-B and, as such, requires a Resolution to be issued by the Commission. SoCalGas respectfully requests that it be approved by the Commission at the earliest opportunity.

Notice

A copy of this AL is being sent to SoCalGas's GO 96-B service list and the Commission's service list in R.18-07-005. Address change requests to the GO 96-B service list should be directed by e-mail to tariffs@socalgas.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 by e-mail at Process_Office@cpuc.ca.gov.

/s/ Ronald van der Leeden
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 proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss 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

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

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
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