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July 26, 2021

Advice No. 5847
(U 904 G)

Public Utilities Commission of the State of California

Subject: Conclusion of Southern California Gas Company's Emergency Customer Protections to Support California Customers During the COVID-19 Pandemic

Purpose

Pursuant to Ordering Paragraph (OP) 6 of Decision (D.) 19-07-015, Southern California Gas Company (SoCalGas) hereby submits this advice letter to conclude the extended emergency customer protection period that was authorized by Resolution (Res.) M-4849 and instituted to support residential and small business customers during the COVID-19 pandemic and to detail the: 1) protections offered (the Emergency Customer Protections); 2) start and end periods that customers received protections; 3) outreach efforts conducted; 4) customer impacts; and 5) associated cost recovery.

Background

In D.19-07-015, the Commission implemented a Disaster Relief Program and established a set of minimum emergency disaster customer protection measures that the utilities are directed to implement in the event of a declared emergency.¹ Pursuant to OP 1, emergency disaster customer relief protections shall apply to utility customers in areas affected by a disaster declared a state of emergency by the Governor of California or the President of the United States.² Consistent with OP 2 of D.19-07-015, when a disaster has either resulted in the loss or disruption of the delivery or receipt of utility service and/or resulted in the degradation of the quality of utility services, the utilities must submit a Tier 1 Advice Letter (AL) with the Commission's Energy Division within 15 days of a governor's state of emergency declaration or a presidential state of emergency proclamation reporting compliance with the Decision's mandated

¹ D.19-07-015 at 2

² *Id.* at OP 1.

emergency disaster customer relief protections.³

On March 4, 2020, Governor Newsom declared a State of Emergency related to the COVID-19 pandemic and followed up on March 19, 2020, with an executive order for Californians to shelter in place except to meet essential needs.⁴ In response, on April 16, 2020, the Commission adopted Res. M-4842, Emergency Authorization and Order Directing Utilities to Implement Emergency Customer Protections to Support California Customers During the COVID-19 Pandemic.⁵ Res. M-4842 ordered the utilities to submit Tier 2 Advice Letters describing all reasonable and necessary actions to implement the Emergency Customer Protections and set the end date for the Emergency Customer Protections as April 16, 2021.⁶

On May 22, 2020, SoCalGas submitted AL 5604-B to notify the Commission of SoCalGas' implementation of the applicable emergency customer protections for core customers impacted by the COVID-19 pandemic. SoCalGas subsequently submitted partial supplemental AL 5604-C on June 4, 2020, to revise the COVID-19 Pandemic Protections Memorandum Account (CPPMA) to clarify that the protections provided pursuant to Res. M-4842 apply to small business customers consistent with SoCalGas' tariffs – namely those customers taking service on a non-residential core rate schedule with an annual consumption of 10,000 therms of gas or less.

On February 11, 2021, the CPUC approved Res. M-4849, which extended the Emergency Customer Protections to June 30, 2021, and ordered the creation of transition plans to facilitate the smooth transition for customers when the Emergency Customer Protections are lifted.⁷

On February 22, 2021, SoCalGas submitted AL 5768 to demonstrate compliance with the extension of emergency customer protections to June 30, 2021 and included revisions to its tariffs. On February 24, 2021, SoCalGas submitted supplemental AL 5768-A to include the following sections: Eligibility and Time Limits for Emergency Customer Protections, complete Description of Adopted Customer Protections, CPPMA, and Tracking Uncollectible Expense Associated with COVID-19 Customer Protections, which were inadvertently excluded in AL 5768.

On March 19, 2021, SoCalGas submitted AL 5781 in compliance with OP 6 of D.19-07-015 and provided a reporting at the 12-month period from March 4, 2020, the date when

³ *Id.* at OP 2.

⁴ Executive Department of California, Proclamation of State of Emergency (March 4, 2020), available at: <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.4.20-Coronavirus-SOE-Proclamation.pdf>; California Executive Order N-33-20 (March 19, 2020), available at: <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.19.20-attested-EO-N-33-20-COVID-19-HEALTH-ORDER.pdf>.

⁵ Res. M-4849, available at: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M366/K625/366625011.PDF>.

⁶ Res. M-4842, available at: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M333/K482/333482381.PDF>.

⁷ Res. M-4849 at OP 5.

the Emergency Customer Protections were implemented, through March 4, 2021, for residential and small business customers.

On April 1, 2021, SoCalGas submitted AL 5794, pursuant to OP 5 of Res. M-4849, with its transition plan that included: 1) a timeline of the new start and resumed activities, 2) a marketing, education, and outreach (ME&O) strategy, 3) an explanation of the activities' timeline and ME&O strategy for compliance and safety, and 4) a progress tracking and reporting plan. On April 27, 2021, SoCalGas submitted supplemental AL 5794-A, pursuant to the Energy Division's direction to include an additional reporting metric for the arrearage management program (AMP).

Discussion

In response to the COVID-19 pandemic, SoCalGas implemented the following applicable customer protections in accordance with Res. M-4842 and Res. M-4849. Other measures of the Emergency Consumer Protection Plan may not be applicable due to the special circumstances of COVID-19 and are not available under this event.

(1) Waive deposit requirements for affected core customers seeking to reestablish service and expedite move-in and move-out service requests;

Consistent with D.19-07-015, the expedited move-in and move-out service request protection was designed for customers responding to physical disasters who needed to relocate from damaged structures or faced disruption or degradation of service as a result of the disaster condition. This customer protection is not applicable to the COVID-19 pandemic.

Pursuant to D.20-06-003, SoCalGas does not require residential customers to pay an establishment of credit deposit for new service. SoCalGas waived deposits for 16,601 small business customers who established new service effective March 4, 2020 through June 30, 2021.

(2) Stop estimated usage for billing attributed to the time period when a home/unit was unoccupied as a result of the emergency;

This protection was designed to protect customers who needed to evacuate their home due to a damaged structure caused by a physical disaster. This customer protection is not applicable to the COVID-19 pandemic since it has not resulted in the discontinuation, disruption, or degradation of service.

(3) Identify the premises of affected customers whose utility service has been disrupted or degraded, and discontinue billing these premises without assessing a disconnection charge;

This customer protection is associated with a damaged structure caused by a physical disaster and is not applicable to the COVID-19 pandemic. SoCalGas does not have a disconnection charge.

(4) Prorate any monthly access charge or minimum charges;

This customer protection is associated with a damaged structure caused by a physical disaster and is not applicable to the COVID-19 pandemic.

(5) Implement payment plan options for eligible core customers;

Pursuant to D.20-06-003, SoCalGas offers residential customers 12-month payment plan options. For the period March 4, 2020 through June 30, 2021, SoCalGas processed 12-month payment plans for 58,404 residential customers and 1,925 small business customers.

(6) Suspend disconnection for non-payment and associated fees, waive deposit requirements for core customers and late fee requirements for eligible non-residential core customers;

On March 13, 2020, SoCalGas instituted a suspension of customer disconnections for non-payment for all eligible core customers until further notice. Additionally, for eligible core customers whose natural gas service was disconnected at any point in 2020 due to non-payment, SoCalGas restored service for 682 residential and small business customers without requiring any additional payment. The disconnection suspension will end on September 30, 2021,⁸ and applies to all eligible core customers, as required by D.19-07-015 and Res. M-4842. SoCalGas waived late payment fees for 98,865 small business customers. Many of these customers had more than one late payment fee waived over the past 13 months.

The total number of fees waived was 447,440, and the total amount of fees waived was \$1,467,538.69. SoCalGas does not assess late payment charges for residential customers. SoCalGas does not report customer late payment history to consumer credit reporting agencies. SoCalGas has suspended all collections activity, including field service collections for eligible core customers.

Pursuant to D.20-06-003, SoCalGas does not require residential customers to pay a deposit to re-establish of credit due to slow or non-payment or following disconnections. SoCalGas cannot determine how many small business customers were not asked to pay a deposit to re-establish credit with SoCalGas for slow payment or non-payment of bills because effective March 4, 2020, SoCalGas disabled its credit scoring module for small business customers. In addition, because SoCalGas did not disconnect any small business customers during the disconnection moratorium period, SoCalGas did not ask any small business customers to pay a deposit following a disconnection.

(7) Support low-income residential customers by: (a) freezing all standard and high-usage reviews for the California Alternate Rates for Energy (CARE) program eligibility; (b) contacting all community outreach contractors, the community based organizations who assist in enrolling hard-to-reach low income customers

⁸ D.20-06-003 at OP 1.

into CARE, to help better inform customers of these eligibility changes; (c) partnering with the program administrator of the customer funded emergency assistance program for low-income customers and increase the assistance limit amount; and (e) indicate how the energy savings assistance program can be deployed to assist customers;

a) Freezing all standard and high-usage reviews for the CARE program eligibility.

Effective March 4, 2020, SoCalGas froze the CARE eligibility verification process through June 30, 2021. To support low-income residential customers during this protection period, all 1.7 million SoCalGas CARE customers were not subject to the post-enrollment verification process. SoCalGas also did not require any CARE customers with existing verification requests to complete the process in order to remain on the program.

High-usage reviews are not applicable to the SoCalGas CARE program.

b) Contacting all community outreach contractors, the community-based organizations who assist in enrolling hard-to-reach low-income customers into CARE, to help better inform customers of these eligibility changes.

SoCalGas' Customer Assistance Programs outreach team contacted 25 community partners and provided them with information on SoCalGas' response to COVID-19 by sending them a fact sheet in English and Spanish as well as determining if any additional materials were needed to inform customers about CARE and the eligibility changes. These community partners conducted outreach to 2,764,179 SoCalGas customers to provide information about the customer protections.

c) Partnering with the program administrator of the customer funded emergency assistance program for low-income customers and increase the assistance limit amount.

SoCalGas' Gas Assistance Fund (GAF) administered by United Way of Greater Los Angeles has increased the assistance limit amount to \$200 for eligible affected customers. From March 4, 2020 through June 30, 2021, 6,332 customers took advantage of the fund and SoCalGas disbursed \$847,511.59. From March 2020 to June 2021, GAF communicated to customers through multiple media channels. In July 2020, a bill message was sent in English and Spanish informing all customers of the increased GAF grant amount for those seeking financial relief from the pandemic. This was followed by a two-panel bill insert that was sent in November. In October 2020, SoCalGas launched a Facebook advertising campaign sharing information about GAF in English and Spanish throughout our service territory. This campaign ran until mid-December 2020. Lastly, between December 2020 and March 2021, GAF information was advertised in English and Spanish throughout multiple community publications. Flyers were also shared in Korean, Chinese, and Tagalog to non-profit organizations that served these communities in January 2021.

d) (placeholder – there is no part 7d in the resolution)

e) Indicate how the ESA program can be deployed to assist customers.

On March 18, 2020, SoCalGas suspended energy savings assistance (ESA) program activities requiring face-to-face program activity, resulting in suspension of all outreach and weatherization activity, as well as appliance work other than cases of critical health and safety needs. SoCalGas implemented a contingency process to virtually enroll customers into the ESA program. SoCalGas proposed virtual enrollment in its 2021-2026 Low Income Application and looks forward to testing this delivery method during the current pandemic in order to provide customers with another option to enroll in the ESA program. SoCalGas resumed face-to-face program activities on June 1, 2020. ESA program contractors are required to follow Centers for Disease Control and Prevention COVID-19 guidelines and protocols when delivering program services. Notwithstanding, the suspension of program services for two and a half months, from March 4, 2020 through June 30, 2021, SoCalGas treated 171,741 homes.

(8) Suspend all CARE and FERA program removals to avoid unintentional loss of the discounted rate during the period for which the customer is protected under these customer protections;

Retroactive to March 4, 2020, SoCalGas suspended CARE program removals due to non-response, and all customers receiving the CARE discount continued to do so. Effective March 4, 2020, SoCalGas suspended all future and pending CARE and Medical Baseline program removals through June 30, 2021.

The Family Electric Rate Assistance (FERA) program is not applicable to SoCalGas.

(9) Discontinue generating all recertification and verification requests that require customers to provide their current income information;

Retroactive March 4, 2020, SoCalGas suspended generating recertification and verification requests that require customers to provide their current income information. From March 4, 2020 to June 30, 2021, SoCalGas froze all CARE eligibility reviews, including recertification and post enrollment verification requests which require customers to provide their current CARE eligibility information and/or proof of eligibility. From March 4, 2020 through June 30, 2021, approximately 633,529 CARE households were automatically extended a year of enrollment and not required to recertify on their recertification anniversary date. In addition, newly enrolled and recertified CARE customers were not subject to the verification process which would require those deemed least likely to be eligible to provide their proof of eligibility.

For Medical Baseline customers, SoCalGas suspended generating recertification requests for 21,242 customers. For the period March 4, 2020 through June 30, 2021, there are 22 Medical Baseline customers whose status was incomplete recertification but were not removed from the Medical Baseline program as a result of this customer protection.

(10) Offer repair processing and timing assistance and timely access to utility customers pursuant to California Public Utilities Code Section 8386(c)(18);

Section 8386 (c)(18) is applicable when a disaster has either resulted in the loss or disruption of the delivery of utility service or receipt of utility service and/or resulted in the degradation of the quality of utility service. This customer protection is associated with a damaged structure caused by a physical disaster and is not applicable to the COVID-19 pandemic.

(11) Include these customer protections as part of their larger community outreach and public awareness plans under Section 8386(c)(16)(b);

D.19-07-015 establishes a baseline of required outreach and education activities so that each utility's plan is robust to reach affected customers. For customers to have equal access to the protections provided in the decision, it is important that all utility customers are aware of the emergency customer protections. To that end, SoCalGas communicated the availability of emergency customer protections to customers in our service territory using communication channels, including:

- Recurring social media messaging (March – May 2020)
- Bill envelope messaging (May 2020)
- Six media releases mentioning the COVID-19 pandemic and directly linking to details of SoCalGas' protections (Dates of releases: March 17, 2020, March 20, 2020, March 27, 2020, April 6, 2020, and September 1, 2020)
- Six media interviews across radio and television, including KNX 1070, Estrella TV, Telemundo, KOST, and Radio Campesina (ranging from March through May in 2020)
- A COVID-19 specific interactive voice response (IVR) (March – September 2020)
- Timely updates to the CARE webpage mentioning the customer protections
- Television interviews on NBC and Telemundo (2x on each television channel) sharing information about the CARE Program and SoCalGas' COVID-19 customer protections (February 2021)
- "Pre-disconnection" letters (mailed or e-mailed, depending on the customer's indicated preference) to affected CARE, residential, and non-residential customers (May – June 2021)
- A bill envelope message to all residential customers promoting socalgas.com/coronavirus as a resource for the most up-to-date information on the COVID-19 response and available support (June 2021)
- Social media messages promoting customer assistance programs and creating awareness of utility scams (ranging from May through June 2021)

SoCalGas will continue to direct customers to SoCalGas' Customer Contact Center, 800-427-2200 and to the SoCalGas website for further assistance. A complete explanation of the protections available are located on SoCalGas' website at

socalgas.com/coronavirus and socalgas.com/billing-support. Web pages will continue to be updated as details surrounding customer protections evolve and information becomes available.

(12) Meet and confer with the Community Choice Aggregators as early as possible to discuss their roles and responsibilities for each emergency customer protection.

SoCalGas does not have Community Choice Aggregators.

COVID-19 CPPMA

SoCalGas records costs associated with the emergency customer protections in the CPPMA. SoCalGas will seek recovery of the costs recorded in the CPPMA through either a separate application or an existing annual proceeding with an expedited schedule. The customer protections concluded on June 30, 2021.

SoCalGas will continue to record costs associated with the Emergency Customer Protections incurred in 2021 in the CPPMA, in accordance with Res. M-4849, and will seek cost recovery in a future cost recovery application.

This AL will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule.

Protest

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 submitted expeditiously. The protest must be made in writing and must be received within 20 days of the date of this AL, which is August 15, 2021. The address for mailing or delivering a protest to the Commission is given below:

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

A copy of the protest should also be sent via e-mail to the attention of 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 addresses shown below on the same date it is mailed or e-mailed to the Commission.

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

Effective Date

SoCalGas believes this AL is subject to Energy Division disposition and should be classified as Tier 1 (effective after staff approval) pursuant to General Order (GO) 96-B. It is submitted in accordance with OP 6 of D.19-07-015. Accordingly, SoCalGas respectfully requests that this AL be made effective on July 26, 2021, which is the date submitted.

Notice

A copy of this AL is being sent to SoCalGas' GO 96-B service list and the Commission's service lists in R.18-03-011, A.14-11-007, A.15-02-001, A.19-11-003, A.20-03-014, R.15-03-010, R.18-07-006, R.18-07-005, R.12-06-013, and A.19-09-014. Address change requests to the GO 96-B service list should be directed via 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 via e-mail at Process_Office@cpuc.ca.gov.

/s/ Joseph Mock
Joseph Mock
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:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: