

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



**Southern California Gas Company  
GAS (Corp ID 904)  
Status of Advice Letter 5936G  
As of December 19, 2022**

Subject: Southern California Gas Company's Percentage of Income Payment Plan (PIPP) Pilot Program, Pursuant to Decision (D.) 21-10-012

Division Assigned: Energy

Date Filed: 02-04-2022

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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

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The AL status certificate indicates:

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Energy Division's Tariff Unit by e-mail to  
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February 4, 2022

Advice No. 5936  
(U 904 G)

Public Utilities Commission of the State of California

**Subject: Southern California Gas Company's Percentage of Income Payment Plan (PIPP) Pilot Program, Pursuant to Decision (D.) 21-10-012**

### **Purpose**

Pursuant to California Public Utilities Commission (Commission or CPUC) Ordering Paragraph (OP) 2 of D.21-10-012, *Decision Authorizing Percentage Of Income Payment Plan Pilot Programs*, SoCalGas hereby submits this Advice Letter (AL) to implement a PIPP pilot program<sup>1</sup> for California Alternate Rates for Energy (CARE) customers and establish the Percentage of Income Payment Plan Memorandum Account (PIPPMA)<sup>2</sup> and Percentage of Income Payment Plan Balancing Account (PIPPBA).<sup>3</sup>

This submittal establishes SoCalGas's Preliminary Statement Part V, Balancing Accounts, PIPPBA, SoCalGas's Preliminary Statement Part VI, Memorandum Accounts, PIPPMA, and revisions to Rule No. 01, Definitions and Rule No. 12, Rendering and Payment of Bills, to include references to the PIPP pilot program, applicable throughout its service territory, as shown on Attachment A.

### **Background**

On September 28, 2017, Governor Brown signed Senate Bill (SB) 598 into law. SB 598 states 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

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<sup>1</sup> D.21-10-012, OP 1.

<sup>2</sup> *Id.*, OP 11.

<sup>3</sup> *Id.*, OP 10.

disconnections, especially among vulnerable populations. Among other things, SB 598 requires the Commission to develop rules, policies, or regulations with a goal of reducing the statewide disconnection rate of gas and electric utility customers by January 1, 2024.

On July 12, 2018, the Commission opened Rulemaking (R.) 18.07-005 to address SB 598 requirements and address residential disconnections across California's electric and gas investor-owned utilities. The overarching purpose of the rulemaking is to adopt rules and policies to reduce disconnections and improve reconnection processes and outcomes for disconnected customers.

On June 11, 2020, the Commission approved D.20-06-003, adopting with modifications the interim rules previously adopted in D.18-12-013 and establishing other process and program changes to address residential disconnections and reconnections. D.20-06-003 created the Arrearage Management Plan (AMP) which provides bill debt forgiveness for residential customers that make on-time bill payments. Also, D.20-06-003 established a rate-setting phase for this proceeding to consider a PIPP where Phase I-A will address near-term reforms for the small and multi-jurisdictional gas and electric utilities, and Phase II will consider additional reforms and preventative measures for reducing the disconnection rate for residential gas and electric disconnections.

On October 7, 2021, the Commission approved D.21-10-012 (Decision), thus ordering Investor-Owned Utilities (IOUs) to implement PIPP pilot programs. The PIPP pilot program shall set a participant's utility bill payment amounts at an affordable percentage of the participant's monthly income where bill caps are set at 4% of household income for both electricity and gas. The decision ordered IOUs to submit a Tier 3 AL within 120 days of the effective date of the decision to establish the PIPP pilot program and establish the PIPPMA and PIPPBA.<sup>4</sup> D.21-10-012 further directed Southern California Edison Company (SCE) to hire a third-party facilitator to coordinate the pilot working group (PIPP WG) and convene within 60 days of the effective date of the decision.<sup>5</sup>

The PIPP WG was comprised of the IOUs, The Utility Reform Network (TURN), California Community Choice Aggregators (CCAs), consumer advocates, and interested stakeholder parties to advise on CCA implementation, identification of eligible high recurring disconnection rate zip codes, outreach, pilot implementation, the evaluation plan, and long-term program design to reach consensus on IOUs respective PIPP implementation plans.<sup>6</sup>

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<sup>4</sup> D.21-10-012, OP 2.

<sup>5</sup> *Id.*, OP 12.

<sup>6</sup> The PIPP WG met four times to discuss various areas of the PIPP implementation, including those described in Attachment A, section 13 of D.21-10-012. PIPP WG meetings were held on December 6, 2021, December 20, 2021, January 10, 2022, and January 24, 2022.

## **PIPP Criteria**

Per the Decision, the PIPP pilot program goal is to test whether a PIPP can: (1) reduce the number of low-income households at risk for disconnection, (2) encourage participation in energy saving and energy management programs, (3) increase access to essential levels of energy service; and (4) control program costs. The PIPP program sets a participant's utility bill amounts at an affordable percentage of the participant's monthly income.

### 1) PIPP Pilot Size, PIPP Eligibility, and Target Eligible Zip Codes

In compliance with the Decision, SoCalGas will implement a PIPP pilot with a duration of 48 months,<sup>7</sup> and will adopt a pilot participant cap at 5,000 customers. SoCalGas plans for target enrollment levels at a minimum of 2,500 customers effective six months after pilot enrollment begins.<sup>8</sup>

PIPP eligibility is limited to customers who are enrolled in the CARE Program and who either:

- a. are located in one of the zip codes with the highest rates of recurring disconnections prior to the disconnections moratorium (March 4, 2020),<sup>9</sup> or
- b. have been disconnected 2 or more times during the 12 months prior to the disconnections moratorium.<sup>10</sup>

Pursuant to the Decision, PIPP eligibility shall exclude master-metered operators and its sub-metered tenants, direct access customers, customers who do not have a SmartMeter, customers who are enrolled in any other pilot, and customers enrolled in net energy metering rates.<sup>11</sup> Accordingly, SoCalGas will exclude Core Aggregation Transportation (CAT) customers from the pilot since billing information may not be available to SoCalGas for CAT customers, and customers that do not have an Advanced Meter (AM) are excluded from pilot participation. Customers who do not have an AM and have opted out may choose to have an AM installed in order to participate in the pilot. PIPP participation is dependent upon CARE enrollment; therefore, if a customer is not already enrolled, the customer must first enroll in CARE prior to participation in the PIPP. Accordingly, any participant that is removed from CARE shall also be removed from PIPP.<sup>12</sup> SoCalGas will allow concurrent enrollment in the PIPP and the AMP.<sup>13</sup>

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<sup>7</sup> D.21-10-012, Attachment A, at p.3.

<sup>8</sup> *Id.*, at p.1.

<sup>9</sup> *Id.*, at p.1.

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

<sup>12</sup> D.21-10-012, at p.21.

<sup>13</sup> *Id.*, Attachment A, Section 10, at p.6.

The Decision provides that the high usage rules of the CARE program will apply to PIPP participants. However, high usage rules do not apply to the CARE program at SoCalGas as it is a gas-only utility.<sup>14</sup> Thus, high usage rules are not applicable for SoCalGas's PIPP pilot program.

SoCalGas plans to target market the PIPP to the following 20 eligible zip codes with the highest rates of recurring disconnections prior to the disconnections moratorium, based on utility data, with a sufficient number of CARE-eligible customers.

**Table 1. Eligible Zip Codes**

#	Zip Code
1	90011
2	90044
3	90003
4	93230
5	90047
6	90037
7	90255
8	90280
9	90018
10	90001
11	90731
12	90201
13	90008
14	90043
15	90016
16	90220
17	90250
18	90002
19	92335
20	90302

Pursuant to the Decision, if a customer moves within the same utility service territory (and establishes service at the new location within 30 days of terminating service at the previous location), the customer should remain enrolled in the PIPP. Otherwise, the customer should be removed and should receive notice of how to apply to participate in the PIPP pilot in other service territories or their current service territory if service is established at a new location more than 30 days from terminating service at the previous location.<sup>15</sup>

<sup>14</sup> Public Utilities Code 739.1(i)(1-2).

<sup>15</sup> D.21-10-012, Attachment A, at p.2.

## 2) Line-Item Discount, and Taxes and Fees

SoCalGas will implement the PIPP bill caps as a line-item discount,<sup>16</sup> and the line-item discount should be either a) the difference between the bill cap and the actual bill, or b) the line-item discount is zero if the actual bill is lower than the bill cap.<sup>17</sup>

SoCalGas plans to apply the PIPP bill cap to a customer's bill prior to calculating any third-party taxes, charges, and fees.<sup>18</sup>

## 3) Proposed Electric & Gas Bill Cap Split

The PIPP bill caps should only apply to current charges and not past-due charges,<sup>19</sup> and SoCalGas will follow existing bill collection processes to address missed payments.

For the PIPP pilot program, the Decision adopts monthly bill caps set at 4% of household income for both electricity and gas with the following standard assumptions: (i) household size of 3 people; (ii) reference income of 50% of Federal Poverty Guidelines (FPG) for households with incomes between 0-100% of FPG; and (iii) reference income of 150% of FPG for households with incomes between 101-200% of FPG.<sup>20</sup> Bill caps will be updated annually to reflect current income guidelines, concurrently with CARE program income guideline updates.<sup>21</sup>

**Table 2: PIPP Monthly Bill Caps (Electricity & Gas)<sup>22</sup>**

	<b>Customers with incomes between 0-100% FPG</b>	<b>Customers with incomes between 101-200% FPG</b>
Reference income	50% of FPG	150% of FPG
Monthly income for household of 3	\$905	\$2,745
Cap based on 4% of monthly income (before taxes and fees)	\$37	\$109

<sup>16</sup> On January 21, 2022, the Commission issued a proposed decision on SCE and Pacific Gas & Electric (PG&E) Petition For Modification (PFM) of D.21-10-012 which modifies the Decision to reference consistently the program as a discount throughout the Decision by replacing references to "line-item bill credit" or "bill credit" with "line-item discount." See <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M443/K010/443010128.PDF>.

<sup>17</sup> D.21-10-012, Attachment A, at p.5.

<sup>18</sup> *Id.*, Attachment A, at p.3.

<sup>19</sup> D.21-10-012, Attachment A, Section 10, at p.6.

<sup>20</sup> *Id.*, Conclusions of Law at 14, at p.84.

<sup>21</sup> *Id.*, at p.42-43.

<sup>22</sup> *Id.*

When applying for PIPP, customers may elect their appropriate bill cap tier based on their total household income as shown in Table 2 above. Participants who request a bill cap for 0-100% of FPG must prove their income within 90 days or they will be moved to a bill cap for participants at 101-200% of FPG. Participants who request a bill cap for 101-200% of FPG will be subject to CARE eligibility verification processes. PIPP pilot participants will comply with CARE income verification and reverification rules. Participants who have already verified their eligibility through CARE in the previous two years will not be required to verify their incomes.<sup>23</sup>

The joint IOUs completed analysis of historical CARE Residential customer bills to identify the average gas bill and electric bill. A result of this analysis helped to inform the IOUs of a reasonable electric and gas bill cap split. Based on discussion held during the PIPP WG meetings,<sup>24</sup> the IOUs proposed a 75% electric and 25% gas bill cap split<sup>25</sup> for all customers for the entirety of the PIPP pilot and gained agreement from stakeholders on the proposed approach. SoCalGas recommends that all IOUs use the same split and SoCalGas supports the joint IOUs proposal of a 75% electric and 25% gas bill cap split as it creates an ease of understanding for the customer and stakeholders, and increases operational simplicity for the PIPP pilot. SoCalGas recommends rounding the individual IOU PIPP Bill Cap as illustrated in Table 3 for ease of customer marketing and outreach. Since customer behavior in response to the PIPP is not known, the joint IOUs recommend that the evaluation be used to determine if more detailed splits are necessary based on season, climate zone, and/or zip code.

**Table 3: Proposed Electric & Gas Bill Cap Split**

	<b>Customers with incomes between 0-100% FPG</b>		<b>Customers with incomes between 101-200% FPG</b>	
Cap based on 4% of monthly income	\$37		\$109	
	<b>75% Electric</b>	<b>25% Gas</b>	<b>75% Electric</b>	<b>25% Gas</b>
Individual IOU PIPP Bill Cap <sup>26</sup>	\$28	\$9	\$82	\$27

<sup>23</sup> *Id.*, Attachment A, at p.2.

<sup>24</sup> The PIPP WG met four times to discuss various areas of the PIPP implementation, including those described in Attachment A, Section 13 of D.21-10-012. PIPP WG meetings were held on December 6, 2021, December 20, 2021, January 10, 2022, and January 24, 2022.

<sup>25</sup> D. 21-10-012, at p.42. Bill caps will be updated annually to reflect current income guidelines, concurrently with CARE program income guideline updates, to account for changes to FPG.

<sup>26</sup> Based on high-level analysis of historical gas and electric bills, the joint IOUs propose a 75% electric and 25% gas split for the PIPP.



## **PIPP Implementation**

### **Timing**

Pursuant to the Decision, IOUs shall commence marketing, education, outreach and enrollment for its PIPP pilot within 45 days of the approval of its pilot implementation AL.<sup>27</sup> SoCalGas plans to implement the PIPP in two phases: (1) Customer Outreach; and (2) Billing Deployment. Approval of the AL and the PIPP parameters should precede implementation. This implementation timing allows SoCalGas to implement the PIPP and to make any necessary operational changes, including finalizing internal procedures, creating outreach materials, and completing training of staff.

### **Customer Outreach (Phase 1)**

Phase 1 will commence within 45 days of the approval of SoCalGas's pilot implementation AL. Implementation of the PIPP will require customers to submit PIPP pilot interest through the SoCalGas website or complete and sign a direct mail PIPP interest intake form. Then a SoCalGas representative will contact interested customers with more information if there are additional customer inquiries about the PIPP pilot. Given the accelerated timeline, the management of the PIPP pilot program and program development are subject to change based on implementation requirement discussions. SoCalGas will require additional resources (PIPP Specialists) to process customer inquiries, review interest intake forms, verify PIPP eligibility, and communicate participant enrollment. PIPP specialists will perform eligibility review, tracking, overall program management, and provide on-going support to PIPP customers. Phase 1 will include customer outreach and will cover the following requirements:

- PIPP targeted outreach will be conducted, and pilot program information will be available on [www.socalgas.com](http://www.socalgas.com).
- Additionally, [www.socalgas.com](http://www.socalgas.com) will contain a Frequently Asked Questions (FAQ) section about the PIPP.
- PIPP eligibility review, tracking, program management, inquiries, and on-going support will be handled by a dedicated PIPP team.
- PIPP welcome letters will be system generated upon enrollment.

### **Billing Deployment (Phase 2)**

SoCalGas proposes to implement Phase 2 no sooner than 90 days after the approval of its pilot implementation AL. This will allow for a fully integrated, automated billing system to handle enrollment, processing, and reporting of customers on the PIPP. The PIPP line-item discount will be applied to the monthly bill following the later of, the implementation of Phase 2 billing deployment or the customer's date of the PIPP enrollment. Implementation of this phase is expected to occur in the fourth quarter of 2022.

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<sup>27</sup> *Id.*, OP 4.

**Proposed Marketing, Education, and Outreach (ME&O)**

Pursuant to OP 4 of the Decision, the Commission ordered the IOUs to commence marketing, education, and outreach and enrollment in preparation for the PIPP within 45 days of the approval of its pilot implementation AL.<sup>28</sup> SoCalGas provides below its plan for ME&O to targeted PIPP eligible customers that have experienced disconnection.

- SoCalGas will take the following steps to provide outreach efforts to enroll eligible customers.
  - Communications will be targeted to the 20 zip codes with the highest rates of recurring disconnections prior to the disconnections moratorium, based on utility data, with a sufficient number of CARE-eligible customers. Communications will be completed in two phases based on the identified 20 eligible zip codes:
    - Phase 1) Targeted to active CARE enrolled customers that have experienced disconnection
    - Phase 2) Targeted to active Non-CARE enrolled customers that have experienced disconnection and may be eligible for CARE
  - SoCalGas plans to send an e-mail to customers who have opted to receive electronic communications from SoCalGas. The email will inform targeted potentially eligible customers about the PIPP pilot program and provide instructions on how they may inquire and enroll in PIPP.
  - In addition, SoCalGas plans to send a mailed letter to reach customers that do not have an e-mail address on file. The letter will inform targeted potentially eligible customers about the PIPP pilot program and provide instructions on how they may inquire and enroll in PIPP.
  - PIPP landing page and interest intake form will be created on [www.socalgas.com](http://www.socalgas.com).
  - Information and FAQ's about PIPP and other financial assistance programs will be posted on SoCalGas's website, including information on eligibility and how to enroll.
  - Customer Service Representative's (CSR) will receive talking points about the PIPP pilot program and CSR scripts will be updated to inform eligible CARE customers about the PIPP program should there be customer inquiries regarding PIPP when a customer calls in.
  - PIPP enrollment materials will be available online in languages appropriate for the eligible high disconnection rate zip codes.
  - SoCalGas will provide messaging on applicable PIPP communications and the PIPP landing page to encourage customer participation in Energy Savings Assistance Program (ESAP) and other customer assistance programs.

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<sup>28</sup> *Id.*

### **Proposed Community Based Organization (CBO) Support**

CBOs will serve as an additional resource to the customer and will act as an extension to SoCalGas's ME&O communication letter. As part of the Low-Income Decision (D.21-06-015), SoCalGas's dedicated Customer Assistance Programs Community Outreach team has developed partnerships with CBOs<sup>29</sup> to promote and build awareness to the communities they serve advocating for SoCalGas's Customer Assistance Programs (e.g., CARE, Energy Savings Assistance Program (ESAP), Medical Baseline, and Gas Assistance Fund (GAF)) as well as other relevant, non-utility programs such as CA Lifeline, affordable broadband, and rental assistance.

These organizations represent the hard-to-reach and/or low-income communities such as seniors, customers with disabilities, customers with limited English proficiency, extreme poverty, and tribal communities. For the PIPP, SoCalGas will leverage these existing relationships, particularly those community and faith-based organizations that work in the targeted zip codes with the highest recurring disconnections to promote the PIPP pilot and direct customers where to apply, for those customers that may qualify for the PIPP. SoCalGas plans to communicate background regarding the PIPP pilot program to CBOs<sup>30</sup> for their awareness. These organizations are currently compensated based on a Memorandum of Understanding Agreement (MOU). MOUs are developed and agreed upon based on general terms and conditions, scope of work for the CBO, organization overview, goals, objectives, compensation schedule, and reporting.

### **Proposed ESAP CBO Collaboration**

SoCalGas plans to utilize customer data recorded during the ESAP enrollment process to inform potentially eligible customers of the PIPP pilot. In addition, work performed by ESAP CBO direct-install contractors will be leveraged as income verification for PIPP enrollment.<sup>31</sup> SoCalGas plans to target ESAP CBO direct-install contractors that perform work in the targeted zip codes with the highest rates of recurring disconnections prior to the disconnections moratorium.

### **Waitlist to Manage Customer Attrition**

SoCalGas will adopt a pilot participant cap at 5,000 customers and customer interest over the PIPP cap will be managed through a waitlist. SoCalGas considers the use of a waitlist appropriate and the most cost-effective strategy to managing customer attrition. A waitlist will facilitate minimizing the administrative cost of PIPP based on the adopted overall pilot program design.

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<sup>29</sup> SoCalGas AL 5857-B, et al., SoCalGas-submits: Supplemental – Joint Community Based Organization (CBO) Reporting Template of SoCalGas, SDG&E, SCE, and PG&E Pursuant to Decision (D.) 21-06-036 Ordering Paragraph (OP) 8. See [https://tariff.socalgas.com/regulatory/tariffs/tm2/pdf/5857-B\\_et\\_al\\_.pdf](https://tariff.socalgas.com/regulatory/tariffs/tm2/pdf/5857-B_et_al_.pdf).

<sup>30</sup> *Id.*, Attachment D, SoCalGas's Community and Faith Based Organization Relationships.

<sup>31</sup> D.21-10-012, Attachment A, at p.6.

Customers with a past due balance who are interested in joining the PIPP waitlist will be informed that being added to the PIPP waitlist does not prevent disconnection.<sup>32</sup> Once there is availability in the PIPP, SoCalGas will contact customers to confirm interest and enrollment into the PIPP.

SoCalGas plans to offer all available customer assistance programs, including PIPP, to customers, dependent on the customer's eligibility. Customers subject to disconnection may call into SoCalGas's Customer Contact Center and speak with a CSR to receive information about SoCalGas's customer assistance programs which they may qualify for, including information on eligibility and how to enroll. SoCalGas will reserve 500 spaces in its PIPP pilot so that a proportion of the PIPP participant cap is represented by customers subject to disconnection. Enrollment into the PIPP will be managed based on the customer's eligibility and current PIPP participation levels.<sup>33</sup>

### **Evaluation**

Ordering paragraphs 5 and 6 in the Decision requires PG&E, SDG&E, SCE, SoCalGas, and each participating CCAs to file and serve to the service list of this proceeding a report with evaluation metrics covering the previous six months of pilot data within seven months after the launch of the pilot and every six months thereafter. The evaluation report shall be completed and served on the service list of this proceeding within 25 months of the approval of the PIPP pilot program AL.

PG&E shall conduct a Request for Proposals (RFP) to hire an evaluation contractor for the pilots, based on direction by the CPUC's Energy Division (ED), and shall contract with the evaluation contractor selected by ED staff. PG&E shall conclude the RFP process and shall enter into a contract with the chosen evaluation contractor within six months of the date of this Decision.<sup>34</sup>

If the pilot evaluation report finds that the pilots achieved the goals established in the Decision or showed significant potential to achieve these goals with modifications,<sup>35</sup> then (i) the pilot working group will file and serve recommendations for the long-term PIPP program design within 4 months after the evaluation report is served, and (ii) IOUs shall file a joint application for a long-term PIPP program within 7 months after the evaluation report is served, and shall serve a courtesy copy of the joint application to the service list of the proceeding.<sup>36</sup>

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<sup>32</sup> Following SoCalGas's existing operational processes, if customers have a past due balance on their account, the customer will be instructed to pay the past due balance, enroll in a payment plan, or be made aware of other customer assistance programs.

<sup>33</sup> D.21-10-012, Attachment A, at p.1.

<sup>34</sup> *Id.*, OP 13.

<sup>35</sup> *Id.*, Attachment A, at p.1.

<sup>36</sup> *Id.*, OP 8.

### **Cost Tracking and Recovery**

Pursuant to the Decision, SoCalGas proposes to establish the PIPPBA and PIPPMA. The proposed preliminary statements are included as Attachment A.

Pursuant to OP 9 of the Decision, SoCalGas will recover gas pilot costs from all gas customers in transportation rates on an equal-cents-per-therm basis.

#### **Establishment of PIPPBA**

Pursuant to OP 10 of the Decision, SoCalGas establishes a two-way balancing account PIPPBA to create more transparency and to track the PIPP pilot bill subsidies.

#### **Establishment of PIPPMA**

Pursuant to OP 11 of the Decision, SoCalGas establishes the PIPPMA to record and track all incremental and pilot administrative costs with implementing the PIPP pilot program in the Decision.

The amounts recorded in the PIPPMA will be subject to reasonableness review in a future General Rate Case.

#### **Residential Disconnection Protections Memorandum Account (RDPMA)**

On December 3, 2021, SoCalGas submitted AL 5910 requesting for approval with the CPUC modifications to its Preliminary Statement Part VI – Memorandum Accounts, applicable throughout its service territory. SoCalGas will temporarily record incremental administrative-related costs for the PIPP pilot to the RDPMA,<sup>37</sup> effective the date of D.21-10-012, until the Commission has approved the creation of the PIPPMA.<sup>38</sup> Upon approval, the PIPP related administrative costs will be transferred from the RDPMA to the PIPPMA.

The amounts recorded in the PIPPMA will be subject to reasonableness review in a future General Rate Case.

#### **SoCalGas's Cost Estimates for the PIPP Pilot**

As the program details of the PIPP pilot project are finalized, SoCalGas's costs estimates may be subject to change. Additionally, SoCalGas anticipates that it will need more than 6 months after the program rules are finalized to make the necessary system

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<sup>37</sup> SoCalGas AL 5910, Modification to Preliminary Statement Part VI, Residential Disconnection Protections Memorandum Account (RDPMA).

<https://tariff.socalgas.com/regulatory/tariffs/tm2/pdf/5910.pdf>.

<sup>38</sup> D.21-10-012, OP 2.

changes to support this program. The additional time needed will depend on the complexity of the final rules.

**Table 4: SoCalGas Estimated PIPP Cost Estimates<sup>39</sup>**

<b>Breakdown</b>	<b>Cost Estimate</b>	<b>Assumptions</b>
Bill Subsidy <sup>40</sup>	\$1,680,000 - \$6,000,000	Bill subsidy is a) the difference between the bill cap and the actual bill, or b) zero if the actual bill is lower than the bill cap.
IT (Billing)	\$300,000 - \$1,300,000	Billing estimates include planning, testing, and support. Does not include project planning and support related costs.
Enrollment and Income Verification	\$81,000 - \$115,000	Estimates are based on labor costs associated with training and income verification.
Outreach / Communications	\$100,000 - \$120,000	Estimate based on communication needs including, but not limited to: emails, direct mail letters, envelopes, printed collateral, translations, and postage. Estimates may change depending on the number of responses, given the enrollment cap.
CBO Support <sup>41</sup>	TBD	Dependent on the CBOs willing to support the PIPP pilot effort. Defined compensation listed in MOUs are driven based on the \$ amounts provided by respective CBOs.
Ongoing Support	\$25,000	Estimate assumes 700 calls per year, over the 4-year pilot.
Measurement & Evaluation <sup>42</sup>	TBD	Shared among the IOUs.

<sup>39</sup> Estimated costs for the duration of the 4-year PIPP pilot.

<sup>40</sup> Estimated cost for bill subsidies were calculated based on a \$34 estimated CARE residential gas bill based on current rate.

<sup>41</sup> SoCalGas is coordinating with CBOs to determine costs associated to support the PIPP. These costs are expected to be included in the request for future recovery.

<sup>42</sup> Based on on-going RFP the evaluation cost is subject to change and estimated costs are not available at this time.

**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 electronically and must be received within 20 days after the date of this AL, which is February 24, 2022. Protests should be submitted to the attention of the Energy Division Tariff Unit at:

E-mail: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

In addition, protests and all other correspondence regarding this AL should also be sent electronically to the attention of:

Attn: Gary Lenart  
Regulatory Tariff Manager  
E-mail: [GLenart@socalgas.com](mailto:GLenart@socalgas.com)  
E-mail: [Tariffs@socalgas.com](mailto:Tariffs@socalgas.com)

**Effective Date**

OP 2 of D.21-10-012 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. Accordingly, 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' 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 via e-mail to [Tariffs@socalgas.com](mailto: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](mailto: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 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: 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:

ATTACHMENT A  
Advice No. 5936

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 59551-G	PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS, DESCRIPTION AND LISTING OF BALANCING ACCOUNTS, Sheet 2	Revised 57870-G
Original 59552-G	PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS, PERCENTAGE OF INCOME PAYMENT PLAN BALANCING ACCOUNT (PIPPBA), Sheet 1	
Revised 59553-G	PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS, DESCRIPTION AND LISTING OF MEMORANDUM ACCOUNTS, Sheet 2	Revised 58988-G
Original 59554-G	PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNT, PERCENTAGE OF INCOME PAYMENT PLAN MEMORANDUM ACCOUNT (PIPPMA), Sheet 1	
Revised 59555-G	Rule No. 01, DEFINITIONS, Sheet 13	Revised 51168-G
Revised 59556-G	Rule No. 12, RENDERING AND PAYMENT OF BILLS, Sheet 6	Revised 59389-G
Original 59557-G	Rule No. 12, RENDERING AND PAYMENT OF BILLS, Sheet 7	
Original 59558-G	Rule No. 12, RENDERING AND PAYMENT OF BILLS, Sheet 8	
Original 59559-G	Rule No. 12, RENDERING AND PAYMENT OF BILLS, Sheet 9	
Revised 59560-G	TABLE OF CONTENTS	Revised 59391-G
Revised 59561-G	TABLE OF CONTENTS	Revised 59550-G
Revised 59562-G	TABLE OF CONTENTS	Revised 58885-G
Revised 59563-G	TABLE OF CONTENTS	Revised 58992-G
Revised 59564-G	TABLE OF CONTENTS	Revised 58993-G

**PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS**  
**DESCRIPTION AND LISTING OF BALANCING ACCOUNTS**

Sheet 2

(Continued)

**B. LISTING OF BALANCING ACCOUNTS** (Continued)

Distributed Energy Resources Services Balancing Account (DERSBA)  
Storage Integrity Management Program Balancing Account (SIMPBA)  
Natural Gas Leak Abatement Program Balancing Account (NGLAPBA)  
Statewide Energy Efficiency Balancing Account (SWEEBA)  
Dairy Biomethane Project Memorandum Account (DBPBA)  
San Joaquin Valley Disadvantaged Communities Balancing Account (SJVDACBA)  
Safety Enhancement Expense Balancing Account – Phase 2 (SEEBA-P2)  
Safety Enhancement Capital Cost Balancing Account – Phase 2 (SECCBA-P2)  
Liability Insurance Premium Balancing Account (LIPBA)  
Residential Uncollectible Balancing Account (RUBA)  
Percentage of Income Payment Plan Balancing Account (PIPPBA)

N

(TO BE INSERTED BY UTILITY)

ADVICE LETTER NO. 5936  
DECISION NO. 21-10-012

ISSUED BY

**Dan Skopec**  
Vice President  
Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)

SUBMITTED Feb 4, 2022  
EFFECTIVE Dec 15, 2022  
RESOLUTION NO. \_\_\_\_\_

PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS  
PERCENTAGE OF INCOME PAYMENT PLAN BALANCING ACCOUNT (PIPPBA)

Sheet 1

1. Purpose

The PIPPBA is an interest bearing, two-way balancing account recorded on SoCalGas' financial statements. In Decision (D.) 21-10-012, the Commission authorized the establishment of a Percentage of Income Payment Plan (PIPP) pilot program in an effort to reduce the number of low-income households at risk for disconnection. The PIPP pilot program will be in effect for a 4-year period. Pursuant to D.21-10-012, the PIPPBA will record the bill subsidies (line-item discount)\* applied to a customer's bill in accordance with the PIPP pilot program.

2. Applicability

The PIPPBA shall apply to all gas customers except those specifically excluded by the Commission.\*\*

3. Rates

The PIPPBA shall be applied to rates as described in the Disposition section below.

4. Accounting Procedures

SoCalGas will maintain the PIPPBA by making entries, net of Franchise Fees and Uncollectibles (FF&U) as applicable, at the end of each month as follows:

- a. A debit entry equal to the bill subsidies (line-item discount)\*\*\* applied to a customer's bill in accordance with the PIPP pilot program;
- b. An entry to amortize the PIPPBA as authorized by the Commission; and
- c. An entry equal to interest on the average balance in the account during the month, calculated in the manner described in Preliminary Statement, Part I, J.

5. Disposition

SoCalGas will amortize the balance in the PIPPBA in customers' gas transportation rates in connection with its annual regulatory account update advice letter submittal. The balance will be allocated on an Equal Cents Per Therm (ECPT) basis.

\* On January 21, 2022, the Commission issued a proposed decision on Southern California Edison (SCE) and Pacific Gas & Electric Company's (PG&E) Petition For Modification (PFM) of D.21-10-012 which modifies the Decision by replacing references to "line-item bill credit" or "bill credit" with "line-item discount."

\*\* See D.21-10-012.

\*\*\* Proposed decision on SCE and PG&E's PFM of D.21-10-012 (January 21, 2022).

PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS  
DESCRIPTION AND LISTING OF MEMORANDUM ACCOUNTS

Sheet 2

(Continued)

B. LISTING OF MEMORANDUM ACCOUNTS (Continued)

- Pipeline Safety Enhancement Plan – Phase 2 Memorandum Account (PSEP-P2MA)
- Officer Compensation Memorandum Account (OCMA)
- Tax Memorandum Account (TMA)
- Winter Demand Response Memorandum Account (WDRMA)
- System Operator Gas Account (SOGA)
- Avoided Cost Calculator Update Memorandum Account (ACCUMA)
- Injection Enhancement Cost Memorandum Account (IECMA)
- Natural Gas Leak Abatement Program Memorandum Account (NGLAPMA)
- Otay Mesa Pipeline Capacity Memorandum Account (OMPCMA)
- Dairy Biomethane Solicitation Development Memorandum Account (DBSDMA)
- Wildfires Customer Protection Memorandum Account (WCPMA)
- Line 1600 Records Audit Memorandum Account (L1600RAMA)
- General Rate Case Memorandum Account 2019 (GRCMA2019)
- Emergency Customer Protections Memorandum Account (ECPMA)
- San Joaquin Valley Data Gathering Plan Memorandum Account (SJVDGPMA)
- Dairy Biomethane Project Memorandum Account (DBPMA)
- Officer Compensation Memorandum Account 2019 (OCMA2019)
- Core Gas Balancing Memorandum Account (CGBMA)
- California Consumer Privacy Act Memorandum Account (CCPAMA)
- Line 235 Memorandum Account (L235MA)
- Morongo Rights of Way Memorandum Account (MROWMA)
- Pipeline Safety Enhancement Plan Memorandum Account (PSEPMA)
- Aliso Canyon Investigation Memorandum Account (ACIMA)
- COVID-19 Pandemic Protections Memorandum Account (CPPMA)
- Safety Culture Investigation Assessment Memorandum Account (SCIAMA)
- Residential Disconnection Protections Memorandum Account (RDPMA)
- Climate Adaptation Vulnerability Assessment Memorandum Account (CAVAMA)
- Medium and Large Commercial and Industrial COVID-19 Disconnection  
 Moratorium Memorandum Account (CDMMA)
- Percentage of Income Payment Plan Memorandum Account (PIPPMA)

N

(TO BE INSERTED BY UTILITY)

ADVICE LETTER NO. 5936  
 DECISION NO. 21-10-012

ISSUED BY

**Dan Skopec**  
 Vice President  
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)

SUBMITTED Feb 4, 2022  
 EFFECTIVE Dec 15, 2022  
 RESOLUTION NO. \_\_\_\_\_

PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNT Sheet 1  
PERCENTAGE OF INCOME PAYMENT PLAN MEMORANDUM ACCOUNT (PIPPMA)

1. Purpose

The PIPPMA is an interest-bearing memorandum account that is recorded on the Utility's financial statements. In Decision (D.) 21-10-012, the Commission authorized the establishment of a Percentage of Income Payment Plan (PIPP) pilot program in an effort to reduce the number of low-income households at risk for disconnection. The PIPP pilot program will be in effect for a 4-year period. Pursuant to D.21-10-012, the PIPPMA will record administrative costs associated with the implementation of the PIPP pilot program.

Pursuant to Advice No. 5910, SoCalGas shall temporarily record PIPP incremental administrative costs in the Residential Disconnection Protections Memorandum Account (RDPMA) until the Commission has approved the creation of PIPPMA. Upon approval, PIPP-related administrative costs will be transferred from the RDPMA to PIPPMA.

2. Applicability

The PIPPMA shall apply to all customers except those specifically excluded by the Commission.\*

3. Rates

The PIPPMA shall be applied to rates as described in the Disposition section below.

4. Accounting Procedures

SoCalGas shall maintain the PIPPMA by recording entries at the end of each month as follows, net of Franchise Fees and Uncollectibles (FF&U), where applicable:

- a. A debit entry equal to the actual operation and maintenance (O&M) costs and capital-related costs (i.e., depreciation, taxes, and return) associated with implementing the PIPP pilot program; and
- b. An entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the entries above at a rate equal to 1/12 of the interest rate on three-month nonfinancial Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor publication.

5. Disposition

The disposition of the account balance will be addressed in SoCalGas next general rate case or other applicable proceeding.

\* See D. 21-10-012.

(TO BE INSERTED BY UTILITY)

ADVICE LETTER NO. 5936  
DECISION NO. 21-10-012

ISSUED BY

**Dan Skopec**  
Vice President  
Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)

SUBMITTED Feb 4, 2022  
EFFECTIVE Dec 15, 2022  
RESOLUTION NO. \_\_\_\_\_

Rule No. 01  
DEFINITIONS

Sheet 13

(Continued)

Percentage of Income Payment Plan (PIPP) Pilot Program: The PIPP is a program that sets a participant's utility bill payment amounts at an affordable percentage of the participant's monthly income. Participants will have their monthly charges for gas service capped based on their qualified income tier. See also Rule No. 12.

Permanent Service: Service which, in opinion of the Utility, is of a permanent and established character. Customer's use of gas may be continuous, intermittent, or seasonal in nature.

Point(s) of Delivery: Place(s) where Utility delivers customer-owned natural gas to customer at its Facility.

Point(s) of Receipt: Place(s) where customer delivers, or has delivered on its behalf, natural gas into the Utility System.

Pooling Service: The administrative aggregation or disaggregation of natural gas supplies at the Citygate and Receipt Points.

Potentially Capacity-Constrained Area: Segments of the local transmission system in which customer requests for firm transportation service currently exceed, or within the next five years may exceed, available capacity. Such requests must be based on historical usage or evidence which substantiates expected incremental load.

Premises: All of the real property and apparatus employed in a single enterprise on an integral parcel of land undivided, excepting in the case of industrial, agricultural, oil field, resort enterprises and public or quasi-public institutions, by a dedicated street, highway or other public thoroughfare or a railway. Automobile parking lots constituting a part of and adjacent to a single enterprise may be separated by an alley from the remainder of the premises served.

Prime Mover: Machine which converts heat energy supplied by fuel into mechanical energy.

Priority: Classification assigned to all customers to be used in the event of curtailment as provided for in Rule 23.

Procurement Customer: Customer who receives both natural gas procurement and transportation services from the Utility.

Procurement Management Charge: Charges billed to CTAs participating in the Core Aggregation Transportation program that may arise from CTAs' management of procurement portfolios on behalf of customers served by the CTAs.

(Continued)

(TO BE INSERTED BY UTILITY)  
ADVICE LETTER NO. 5936  
DECISION NO. 21-10-012

ISSUED BY  
**Dan Skopec**  
Vice President  
Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)  
SUBMITTED Feb 4, 2022  
EFFECTIVE Dec 15, 2022  
RESOLUTION NO. \_\_\_\_\_

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Rule No. 12

Sheet 7

RENDERING AND PAYMENT OF BILLS

(Continued)

E. Percentage of Income Payment Plan (PIPP) (Continued)

1. PIPP Eligibility and Enrollment Criteria (Continued)

- a. Customers that are either located in one of the zip codes with the highest rates of recurring disconnections prior to the disconnections moratorium; or
- b. That have been disconnected 2 or more times during the 12 months prior to the disconnections moratorium.
- c. Customers that do not have an Advanced Meter (AM) are excluded from pilot participation. Customers who do not want an AM (AM Opt-Out) may choose to have an AM installed in order to participate in the pilot.

As such PIPP eligibility excludes master-metered operators and its sub-metered tenants, customers who are enrolled in any other pilot, and customers in the CAT customers from the pilot.

2. Rates

Monthly bill caps will be standardized for households in two qualifying income tiers: 0-100% of Federal Poverty Guidelines (FPG) for a household of 3, and 101-200% of FPG for a household of 3. Bill caps will be updated annually to reflect current income guidelines, concurrently with CARE program income guideline updates.

PIPP pilot participants will receive a monthly bill cap their gas charges equal to their qualified income tier.

Effective the approval date of Advice No. 5936, the monthly bills caps for gas is as follows:

- Tier 1. 0-100% of FPG \$9.00
- Tier 2. 101-200% of FPG \$27.00

The PIPP Pilot bill cap will be applied to a customer's bill prior to calculating any third-party taxes, charges, and fees and will appear as a line-item discount. The line-item discount will be either (a) the difference between the bill cap and the sum of the charges subject to the bill cap, or (b) zero if the sum of the charges is lower than the bill cap.

(Continued)

(TO BE INSERTED BY UTILITY)  
ADVICE LETTER NO. 5936  
DECISION NO. 21-10-012

ISSUED BY  
**Dan Skopec**  
Vice President  
Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)  
SUBMITTED Feb 4, 2022  
EFFECTIVE Dec 15, 2022  
RESOLUTION NO. \_\_\_\_\_

Rule No. 12  
RENDERING AND PAYMENT OF BILLS

Sheet 8

(Continued)

3. Income Verification and Reverification

PIPP pilot participants must comply with Schedule No. G-CARE income verification and reverification rules. Information provided by the customer to the Utility is subject to verification as authorized by the Commission. Refusal or failure to provide documentation of eligibility acceptable to the Utility, upon request, shall result in the denial or termination of PIPP Pilot participation. See Schedule No. G-CARE.

4. Moves or Discontinues Service

An enrolled customer may continue to remain in PIPP when they establish service at a new location in SoCalGas' territory regardless of their new zip code or prior disconnection status. To remain enrolled in the PIPP pilot, a customer will have 30 days from the date service is terminated to establish service at a new location and request PIPP for their new service. If service at a new location is established after 30 days and service is terminated at the previous location, the customer will be removed from the PIPP pilot. Customers will be provided information on how to apply to participate in the PIPP pilot in other service territories or their current service territory for when they are unable to re-establish service in the SoCalGas service area.

5. CARE Removal

If a PIPP Pilot participant is removed from Schedule No. G-CARE for any reason, the participant is no longer eligible for the PIPP Pilot and will be removed immediately.

6. PIPP Bill Cap

a. 0-100% of FPG

Customers requesting a bill cap for 0-100% of FPG must prove their income within 90 days or they will be moved to a bill cap for participants at 101-200% of FPG.

b. 101-200% of FPG

Customers requesting a bill cap for 101-200% of FPG will be subject to the CARE eligibility verification processes. Participants will not be required to verify their income if it has been verified for CARE within the last two years.

(Continued)

(TO BE INSERTED BY UTILITY)  
ADVICE LETTER NO. 5936  
DECISION NO. 21-10-012

ISSUED BY  
**Dan Skopec**  
Vice President  
Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)  
SUBMITTED Feb 4, 2022  
EFFECTIVE Dec 15, 2022  
RESOLUTION NO. \_\_\_\_\_

Rule No. 12  
RENDERING AND PAYMENT OF BILLS

Sheet 9

(Continued)

7. High Usage Rules

The high usage rules of the CARE program will apply to PIPP participants; however, high usage rules do not apply to the CARE program at SoCalGas as it is a gas-only utility. Thus, high usage rules are not applicable for SoCalGas.

8. Missed Payments

The PIPP pilot bill cap is only applicable to current charges, not past-due amounts. Nonpayment of the amount so billed shall constitute nonpayment of the service or billing and will be subject to the provision for discontinuance of service as set forth in Rule No. 09.

F. Late Payment Charges

A monthly late payment charge, equal to SoCalGas' authorized return on rate base divided by 12 and rounded to the nearest one-tenth of one percent, may be assessed on non-residential accounts with billing in arrears if not received by the Utility, or by a duly authorized agent of the Utility, by the "late charge date" as shown on the bill. The "late charge date" will be at least 19 days from the date mailed as indicated on the bill.

Effective January 1, 2006, the Late Payment Charge is 0.7% (seven-tenths of one percent).

If an account is served by or serves a State Agency and payment is not received within the time limits specified pursuant to the California Prompt Payment Act, Government Code Section 927 et seq., then a penalty for late payment shall be imposed upon the State in accordance with the provisions of the California Prompt Payment Act. For purposes of determining the applicability of this section, the phrase "is served by or serves a State Agency", shall include governmental entities where a portion of utility service is provided or arranged for by a State Agency and collection and payment of the particular utility bills is handled by that State Agency. It is the intent of this section not to exceed the requirements and limitations specified by the California Prompt Payment Act.

(TO BE INSERTED BY UTILITY)

ADVICE LETTER NO. 5936  
DECISION NO. 21-10-012

ISSUED BY

**Dan Skopec**  
Vice President  
Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)

SUBMITTED Feb 4, 2022  
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RESOLUTION NO. \_\_\_\_\_

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(Continued)

(TO BE INSERTED BY UTILITY)  
 ADVICE LETTER NO. 5936  
 DECISION NO. 21-10-012

ISSUED BY  
**Dan Skopec**  
 Vice President  
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)  
 SUBMITTED Feb 4, 2022  
 EFFECTIVE Dec 15, 2022  
 RESOLUTION NO. \_\_\_\_\_

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(TO BE INSERTED BY UTILITY)  
 ADVICE LETTER NO. 5936  
 DECISION NO. 21-10-012

ISSUED BY  
**Dan Skopec**  
 Vice President  
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)  
 SUBMITTED Feb 4, 2022  
 EFFECTIVE Dec 15, 2022  
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