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Advice No. 6172-G
(U 904 G)

Public Utilities Commission of the State of California

Subject: Post Enrollment Verification Outbound Call Pilot

Purpose

Pursuant to Ordering Paragraph (OP) 13 of Decision (D.) 21-06-015 by the California Public Utilities Commission (Commission or CPUC), Southern California Gas Company (SoCalGas) hereby submits to the Commission this Tier 2 Advice Letter (AL) summarizing the findings of its Post Enrollment Verification (PEV) Outbound Call Pilot (PEV Pilot) to assist participants of the California Alternate Rates for Energy (CARE) program who may need additional support to complete the paperwork needed to verify program eligibility.

Background

In D.21-06-015, the Commission directed Pacific Gas & Electric Company (PG&E), Southern California Edison Company (SCE), SoCalGas and San Diego Gas & Electric Company (SDG&E) (collectively, the IOUs) to simultaneously conduct a six- to twelve-month outbound call pilot to assess whether such service would minimize the PEV de-enrollments for those households that qualify for CARE.¹ The Commission further specified that the funding for the pilot shall not exceed \$80,000 per IOU.² Additionally, the Commission required each IOU to submit a Tier 2 AL within three months of the pilot's conclusion. The Commission also provided the criteria under which the Energy Division (ED) will review and dispose of the IOUs' Tier 2 AL to determine whether the pilot was "cost-effective, had an average monthly success rate of at least 10 percent or provided other benefits to customers participating in the pilot" to continue on a pilot basis or a permanent basis.³

¹ D.21-06-015 at 41, and OP 13 at 474.

² *Id.* at p. 41.

³ *Id.* at 42.

Discussion

SoCalGas coordinated Working Group (WG) meetings⁴ with the IOUs and designed its pilot to assist customers who submitted incomplete or outdated documents to a PEV request to confirm their program eligibility to remain on the CARE program. In addition, the customers that were reached through the PEV outbound call pilot were provided with information on other income-qualified energy savings programs that SoCalGas administers and/or has partnerships with.

The process and results of SoCalGas's PEV Outbound Call Pilot are summarized below, in accordance with evaluation criteria outlined in D.21-06-015.⁵

Criteria for evaluation of the pilot:

- Number of CARE households that submitted incorrect PEV documentation or attempted but failed to verify during the pilot.
- Number of these households contacted by the Outbound Call Pilot.
- Number of these households successfully ushered through PEV process by the Outbound Call Pilot.
- Success rate (households successfully ushered through PEV process after attempting but failing on their own, divided by total households contacted through effort) broken down by month and for the overall pilot.
- Cost benefit analysis of pilot, including the incremental cost associated with the expansion of outbound calls and the estimated marketing, outreach, and admin funds saved from having to avoid recapturing eligible households who failed PEV.
- Other benefits customers received by participating in the pilot, if any.
- Recommendation on whether the pilot should conclude, be continued, expanded, or turned into a permanent effort, and the reasons why (i.e., low results, not cost effective). If the IOUs propose to continue the outbound call center efforts either on a pilot basis or a permanent basis, the IOUs shall describe the long-term plan for the effort including how many households it anticipates targeting, capturing, and re-enrolling back into CARE each year, and the proposed long-term budget. The recommendation should also include lessons learned and best practices for continuing the pilot.

Advice Letter Criteria: Call Process and Summary

The following are requirements under D.21-06-015 relating to the call process and summary:⁶

- Number of CARE households that submitted incorrect PEV documentation or “attempted but failed” to verify during the pilot.

⁴ SoCalGas, SDG&E, PG&E, and SCE met to coordinate and discuss various areas of the PEV Pilot design and implementation. Working Group meetings were held on February 4 and March 4 and 25, 2022.

⁵ D.21-06-015 at 41-42.

⁶ *Id.* at 41.

- Number of these households contacted by the Outbound Call Pilot.
- Number of these households successfully ushered through PEV process by the Outbound Call Pilot.
- Success rate (households successfully ushered through PEV process after attempting but failing on their own, divided by total households contacted through effort) broken down by month and for the overall pilot.

Pilot Results: Call Process and Summary

SoCalGas's PEV Outbound Call Pilot launched in June 2022 and concluded after ten months in April 2023. At SoCalGas, CARE Customer Service Representatives (CSRs) perform outbound calls as needed as an existing process for PEVs. Therefore, the only notable changes to current processes for the pilot's purpose was the tracking of outcomes performed by dedicated CARE CSRs.

SoCalGas's PEV Outbound Call Pilot Process is outlined below. The pre-existing processes and new processes resulting from this pilot are noted for awareness and consideration.

- (Existing) A dedicated CARE Customer Service Representative (CSR) places direct calls to the customer who submitted incomplete or outdated PEV documentation to SoCalGas.
- (Existing) If customer contact is made, the CARE CSR provides direction regarding any required/missing documentation from the customer, answers questions, and provides additional information regarding the PEV process.
 - (Existing) The CARE CSR provides information on other available customer assistance programs. The CARE CSR provides information on other SoCalGas income-qualified energy savings assistance programs that may help benefit customers, such as Gas Assistance Fund (GAF), Medical Baseline, Energy Savings Assistance (ESA) Program, Arrearage Management Program (AMP), and Low-Income Home Energy Assistance Program (LIHEAP).
 - (New) The CARE CSR logs the results from the call in the Customer Information System (CIS) via a memo and tracks the results and additional notes in the master spreadsheet.
- (Existing) If the CARE CSR is unable to reach the customer on the first attempt, the CARE CSR will send a personalized PEV incomplete letter which lists out all requirements to successfully complete the PEV, and in the subsequent week, place a second and final follow-up call to the phone number(s) on file as a final attempt to inform the customer to complete the PEV.
 - (New) The CARE CSR logs the results of each attempt to contact the customer in CIS via a memo, whether a personalized letter was sent, results/outcomes, and additional notes in the master spreadsheet.
 - (New) Due to the nature of the PEV outbound calls, estimated talk time per typical CARE CSR call may be exceeded for the pilot.

During the ten months, CARE CSRs contacted and tracked the results for 1,633 households that returned insufficient or outdated documents, reaching 1,277 or 78% of households (HH) on multiple attempts to send in documentation to complete the PEV process. Of the 1,277 HHs reached, the CARE CSRs assisted 619 or 38% of customers reached to complete the PEV process to remain on the CARE program. The overall rate of households that

completed the PEV process within 45 days of receiving a call, voice message or PEV Incomplete letter was 38%. Upon comparing the overall PEV response rate of the pilot to the PEV response rates prior to the pilot, SoCalGas observed no direct increases resulting from pilot activities because it already largely performs the pilot activities as a standard business practice. Over the course of the pilot, success rates fluctuated in a manner consistent with pre-pilot periods. At the conclusion of the pilot, SoCalGas determined CARE CSR tracking of call results to be administratively cumbersome, as there were instances that resulted in multiple contact attempts and subsequent logging of the call results. CARE CSRs additionally mailed 797 letters to those households that were left a voice message or were unreachable. For the customers who were not reachable, 86 returned their PEV documentation due to the various other notifications SoCalGas sent. 28 customers returned documents but were denied due to high income. Because these other forms of customer correspondence may have directly contributed to PEV completion, it is difficult to determine whether outbound dialing efforts alone had a direct correlation to PEV success.



The monthly results are summarized below in Table 1.

Table 1: PEV Pilot Summary Results from June 2022 through April 2023									
Month/ Year	Total No. of HH Returned Incomplete PEV Documentation	Not Reachable ¹	Not Reachable, but completed PEV	Reached ²	No. of HH Reached via Multiple attempts (voicemail left or spoke to customer) ³	PEV Approved	Success Rate ⁴	Denied High Income	Sent add'l Email or Letter
Jun-22	70	16	2	54	81	29	41%	1	19
Jul-22	84	29	8	55	62	22	26%	2	24
Aug-22	77	26	3	51	69	32	42%	0	47
Sep-22	104	27	10	77	98	42	40%	0	99
Oct-22	162	50	14	112	139	66	41%	2	138
Nov-22	91	23	6	68	57	32	35%	0	17
Dec-22	98	16	5	82	82	29	30%	1	32
Jan-23	81	12	3	69	108	28	35%	0	88
Feb-23	142	24	11	118	129	57	40%	3	99
Mar-23	161	28	12	133	145	79	49%	5	72
Apr-23	563	105	12	458	611	203	36%	14	162
Total	1,633	356	86	1,277	1,581	619	38%	28	797
1 Not reachable = phone rings but not answered via customer nor VM, or disconnected number.									
2 Reached = Spoke to household regarding PEV									
3 Multiple messages and conversations with each household.									
4 D.21-06-015 Success rate (households successfully ushered through PEV process after attempting but failing on their own, divided by total households contacted through effort) broken down by month and for the overall pilot.									



Advice Letter Criteria: Costs and Benefits

The following are requirements under D.21-06-015 relating to the pilot's costs and benefits:⁷

- Cost benefit analysis of pilot, including the incremental cost associated with the expansion of outbound calls and the estimated marketing, outreach, and admin funds saved from having to avoid recapturing eligible households who failed PEV.
- Other benefits customers received by participating in the pilot, if any.

Pilot Results: Costs and Benefits

Since 2013, SoCalGas has tracked its PEV costs for the labor needed for the following activities: 1) opening, reviewing and processing CARE verification correspondence; 2) initiating and responding to customer inquiries by mail, fax or phone regarding CARE PEV; 3) resolving billing issues related to CARE PEV; 4) tracking CARE operating statistics in support of operations, management, regulatory reporting; and 5) PEV training. Prior to 2013, the existing authorized funding was consolidated with a Processing, Certification and Verification cost category.⁸ SoCalGas has had dedicated, authorized funding for PEV costs since 2015.

SoCalGas's best practice is to not exclude any customers from receiving a live outbound call for "attempted but failed" PEVs. The unprecedented cold winter season and gas bills during the months of February and March of 2023 led to a higher-than-normal call volume, contributing to a spike in customer communication and costs during April, the last month of the pilot. Additionally, an increase in CARE enrollments in Q1 2023 (likely due to higher bills), resulted in increased PEV requests and the number of customers receiving outbound calls.

SoCalGas used its existing authorized CARE PEV budget to cover the costs for the administrative activities and outbound calls made, as they are an existing authorized practice. For pilot tracking purposes, based on CARE CSR feedback SoCalGas estimated 23% of the direct costs were incremental for tracking and reporting results of towards this pilot, equivalent to \$20,442.19.

To aid with the cost benefit assessment, as summarized in Table 2 the total cost of both pre-existing and the incremental pilot efforts to contact and track the results was \$88,879.09 or \$143.58 per "attempted but failed" household that successfully submitted the required PEV documentation to remain eligible in the program. This cost accounts only for the expenditures associated with the outbound calls and tracking provided by customer representatives.

⁷ *Id.*

⁸ Annual Report of Southern California Gas Company On Low Income Assistance Programs for 2022 at 92-94.

Table 2: Total Costs

Total Costs⁹	# of Household successfully PEV approved	Cost (\$)/Household
\$ 88,879.09	619	\$143.58

Should the pilot conclude and the tracking of results discontinue, the cost for expenditures by CARE CSRs for PEV outbound calls would be estimated at \$110.56 per household.

While SoCalGas does not have a specified marketing and outreach campaign to directly target customers who have not responded to the PEV, SoCalGas does perform targeted marketing to customers with an eligibility probability greater than 85% and have not been marketed to in the previous 12 months. Based on total 2022 Marketing, Education & Outreach (ME&O) expenditures and total new CARE enrollments, the average cost to enroll a CARE customer was \$11.37.

Advice Letter Criteria: Recommendation, Lessons Learned, and Best Practices

The following are requirements under D.21-06-015 relating to recommendation on pilot conclusion, lessons learned, and best practices:¹⁰

- Recommendation on whether the pilot should conclude, be continued, expanded, or turned into a permanent effort, and the reasons why (i.e., low results, not cost effective). If the IOUs propose to continue the outbound call center efforts either on a pilot basis or a permanent basis, the IOUs shall describe the long-term plan for the effort including how many households it anticipates targeting, capturing, and re-enrolling back into CARE each year, and the proposed long-term budget. The recommendation should also include lessons learned and best practices for continuing the pilot.

Pilot Results: Recommendation, Lessons Learned, and Best Practices

Based on the results of the PEV Outbound Call pilot, SoCalGas recommends concluding the pilot, continuing to make live phone calls as an existing best practice at SoCalGas, and discontinuing tracking the results of live outbound calls. SoCalGas annually selects 1-7% of its CARE households for PEV and recommends continuing this PEV selection rate¹¹.

SoCalGas's existing and ongoing PEV process provides multiple notifications in various channels to customers that inform customers of the need to verify their eligibility to remain enrolled in the program. Customers will receive PEV notifications by direct mail, bill

⁹ Total costs include pre-existing activities and incremental pilot activities for cost benefit consideration purposes. The amount shown does not include additional costs, such as administrative costs and data analysis resource costs required to complete the pilot.

¹⁰ D.21-06-015 at 42.

¹¹ D.12-08-044, COL 122 at 361.

message, phone, and My Account, as applicable, and will be removed from CARE if they do not verify their eligibility within the 90 days.¹²

As existing practice, SoCalGas's CARE CSRs place live calls to CARE customers on a case-by-case basis for illegible documents and to customers who have sent unacceptable documents perhaps due to not understanding what was needed. SoCalGas sends a personalized letter to the PEV "attempted but failed" households indicating what is required to complete the PEV process and remain on CARE. SoCalGas has also updated its [PEV FAQs](#)¹³, and made it more prominent on the CARE homepage.

Additionally, SoCalGas plans to implement digital notifications in 2023 and send emails to CARE customers who have been selected for PEV and/or have not responded to the PEV request after 45 days. SoCalGas also plans to explore SMS notifications for PEV-selected customers, if available.

The overall customer sentiment received from the PEV Outbound Call pilot was mixed. CARE CSRs noted some customers preferred to receive one call instead of multiple calls, while other customers preferred to just receive an email instead of a live phone call. CARE CSRs also received additional feedback that some customers liked all the reminders to aid them to remain on the CARE program. Some customers also expressed their appreciation in receiving additional information on other assistance programs that they may be eligible for.

In conclusion, SoCalGas supports providing personalized communication to CARE customers who need additional support to complete the PEV process. SoCalGas recommends continuing its existing PEV processes and best practices with its existing authorized PEV budget. SoCalGas recommends discontinuing tracking the results of live outbound calls, as the additional logging and tracking is administratively burdensome and increases overall program costs. Nevertheless, SoCalGas continuously strives to apply lessons learned to further refine and improve administrative efficiency and enhance CARE program enrollment and retention.

Protests

Anyone may protest this Advice Letter 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 submitted electronically and must be received within 20 days after the date of this Advice Letter, which is August 20, 2023. Protests should be submitted to the attention of the Energy Division Tariff Unit at:

E-mail: EDTariffUnit@cpuc.ca.gov

¹² SoCalGas AL 5794 at 12.

¹³ See <https://www.socalgas.com/save-money-and-energy/assistance-programs/california-alternate-rates-for-energy/care-faqs>.

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

Attn: Gary Lenart
Regulatory Tariff Manager
E-mail: GLenart@socalgas.com
E-mail: Tariffs@socalgas.com

Effective Date

SoCalGas believes this advice letter is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to General Order (GO) 96-B and OP 13 of D.21-06-015. SoCalGas respectfully requests that this submittal be approved on August 30, 2023, which is 30 calendar days after the date submitted.

Notice

A copy of this Advice Letter is being sent to SoCalGas's General Order (GO) 96-B service list and the Commission's service list in A.19-11-003, et al. Address change requests to the GO 96-B service list should be directed via e-mail to Tariffs@socalgas.com or call 213-244-2424. 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



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:
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Email: