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December 29, 2023

Advice No. 6242-G  
(U 904 G)

Public Utilities Commission of the State of California

**Subject: Southern California Gas Company's Arrearage Management Payment Plan (AMP) Program Best Practices Pursuant to Decision (D.) 23-08-049 Ordering Paragraph (OP) 2**

**Purpose**

Pursuant to California Public Utilities Commission (Commission or CPUC) Decision (D.) 23-08-049 Ordering Paragraph (OP) 2, Southern California Gas Company (SoCalGas) hereby submits this Advice Letter (AL) to propose Arrearage Management Payment Plan (AMP) program best practices that the utility will implement.

**Background**

On September 6, 2023, the Commission issued D.23-08-049, directing Pacific Gas and Electric (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric (SDG&E), and SoCalGas (together, the Investor Owned Utilities (IOUs)) to offer 24-month payment plans to eligible residential customers until October 1, 2026. D.23-08-049 also extends the AMP program to October 1, 2026. The Decision directs the IOUs to meet with parties to the proceeding to discuss AMP best practices from the Meet and Confer Report.<sup>1</sup> The IOUs must then file a Tier 2 advice letter to propose AMP program best practices, including minor operational changes, that each utility will implement.

**AMP Stakeholder Meetings**

Per OP 2 of D.23-08-049, the IOUs met with key parties to the proceeding to discuss AMP best practices. The first of two meetings took place on October 24, 2023 and included IOUs and key stakeholders. During this meeting, parties raised questions surrounding customer notifications related to AMP, potential for standardization, and

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<sup>1</sup> See November 2022 Ruling directing the IOUs to file a joint meet-and-confer report by February 3, 2023.

reporting. Prior to the parties regrouping for the second meeting, IOUs aggregated all AMP customer communications to send to attendees in advance of the second meeting, which took place on November 7, 2023. IOUs walked stakeholders through various notifications that are sent to customers throughout the AMP customer journey, from enrollment, to quarterly notifications acknowledging payments made, termination, and missed payments. One party provided written feedback after the meeting, in addition to the feedback received in real time. The proposed modifications below reflect discussion around best practices, lessons learned, and feedback received from meeting attendees.

### **Improve AMP Information & Guidelines**

- Continue to review call center scripts and web Frequently Asked Questions (FAQs) for added clarity.
- Continue to review AMP program offering and information on self-service channels.

As noted in the Meet and Confer Report, SoCalGas observed that many AMP program terminations took place in plan month three, meaning customers failed to make the first two consecutive payments on time and in full.<sup>2</sup> Though the data does not provide insight into why customers defaulted on their plans, SoCalGas recognizes that a potential lack of understanding of program requirements could have contributed to program removal for at least some customers. Additionally, invaluable feedback from various stakeholders regarding IOU AMP communications further emphasized the importance of clarity and customer understanding to achieve program success.

SoCalGas is currently reviewing AMP customer communications and has started making improvements as needed for added clarity. Current efforts include: 1) updating call center scripts to allow customer service representatives to better explain the program guidelines and expectations to the customers 2) improving the AMP FAQs website to cover additional topics and concerns raised since the page launched and 3) reviewing existing customer notifications and implementing some of the recommended edits from the AMP Stakeholder Meetings.

Additionally, SoCalGas is exploring ways to improve the enrollment process across all channels by reviewing AMP language on the SoCalGas.com website and Interactive Voice Response (IVR) System, increasing the ease of click through messaging, and adhering to accessibility guidelines. Though SoCalGas already holds the AA20 Seal of Approval from the Center for Accessible Technology (CforAT) for achieving accessibility standards, SoCalGas will continue to keep accessibility at top of mind as a best practice and intends to apply ADA guidelines used for its websites and existing California Alternative Rate for Energy (CARE) program materials to AMP collateral.

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<sup>2</sup> Joint Meet and Confer Report (February 3, 2023), p. 4, available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M501/K843/501843749.PDF>.

### **Proposed Marketing and Customer Outreach**

- Leveraging existing customer assistance campaigns (ex. CARE), as well as other owned assets (such as socialgas.com website) for opportunities to cross promote AMP.
- SoCalGas will leverage partnerships with Community Based Organizations (CBOs) and faith-based organizations (FBOs) connected to the CARE and (Energy Savings Assistance) ESA programs, to promote AMP.
- Creation of an informational video, known as a vignette, to promote the AMP program and illustrate requirements for enrollment.
- Revisit general AMP communications for opportunities to simplify requirements to qualify and stay on the program.
- Consider paid, targeted media outreach for AMP, in multiple languages.
- Operationalize missed payment communications to participants - previous pilots showed favorable results for text/email messages. Send message to notify the customer that payment is needed to stay on plan or reach out for assistance.

Since program inception, over 250,000 SoCalGas customers have enrolled in AMP. SoCalGas would like to increase the percentage of eligible households enrolled and believes that additional marketing and customer outreach can help to build awareness. Since a customer must be an active CARE participant in order to be eligible for the program, SoCalGas intends to leverage existing campaigns, including but not limited to, CARE and Medical Baseline for opportunities to cross promote AMP. Additionally, SoCalGas will continue to utilize its partnerships with CBOs and FBOs that are connected to CARE and ESA to build AMP awareness and help customers better understand the program requirements and expectations, as these organizations are trusted resources in the communities they serve.

During the AMP Stakeholder Meetings, IOUs discussed best practices surrounding marketing and outreach. PG&E shared a promotional video vignette that they created for AMP, which all parties agreed was very helpful in illustrating what the program is, and what the requirements are. SoCalGas is exploring options for similar marketing materials as well as the potential for paid, targeted media outreach, while also being mindful of ratepayer impacts due to the cost of these efforts. Other forms of customer outreach such as digital communications sent upon missed payments, have shown favorable results<sup>3</sup> and were recognized by stakeholders, as well as the Commission, to be effective. While these communications do not build program awareness, they do provide additional ongoing support to customers thereby increasing the likelihood of program completion. SoCalGas is exploring ways to operationalize these communications for customers who are enrolled in AMP.

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<sup>3</sup> Joint Meet and Confer Report, pp. 4-6.

### **Summary of Stakeholder Feedback and SoCalGas Responses**

Cal Advocates was the only party to provide written feedback after the stakeholder meetings. SoCalGas responds to Cal Advocates' feedback below.

<b>Communication Type</b>	<b>Cal Advocates' Recommendation</b>	<b>SoCalGas Response</b>	<b>Timeline</b>
Enrollment Letter	Include total amount to be forgiven	Information exists on current letter	N/A
	Include breakdown of forgiveness per qualifying payment	Information exists on current letter	N/A
	Include payment plan start and end dates	Information exists on current letter	N/A
	Explain circumstances that would lead to removal of a customer from the program	Reviewing current letter to add information	Requires IT work. Evaluating timeline.
	Explain that partial payments would be reflected as missed payments	Reviewing current letter to add information	Requires IT work. Evaluating timeline.
3-6-9 Month Milestone Letter	Include total amount to be forgiven	Information exists on current letter	N/A
	Include amount already forgiven	Information exists on current letter	N/A
	Include amount remaining to be forgiven	Information exists on current letter	N/A
	Include monthly activity and amount forgiven each month	Information exists on current letter	N/A
	Include a "Number of Missed Payments" line for customer's reference	Evaluating- requires dynamic data	Requires IT work. Evaluating for feasibility and timeline.
Removal Letter	State the specific reason a customer was/risks being removed from the program as opposed to outlining the entire list of reasons a customer may be removed	Information exists on current letter	N/A
	Provide the date a customer is eligible to re-apply	Information exists on current letter	N/A
	Show amount of arrears forgiven through their participation and amount remaining	Information exists on current letter	N/A

Completion Letter	Include discussion of alternative bill assistance programs (as PG&E does)	Reviewing current letter to add information	Requires IT work. Evaluating timeline.
Missed Payment Automated Call	Include specific references to the AMP <i>debt forgiveness program</i> or make a related mention of the function of AMP to improve customer understanding	Not currently available, additional time needed to review as this would be a costly upgrade, not yet determined to be more effective than digital notifications	Requires IT work. Evaluating for feasibility and timeline.
	Include reminder of missed payment rules that will lead to program removal	Not currently available, additional time needed to review as this would be a costly upgrade, not yet determined to be more effective than digital notifications	Requires IT work. Evaluating for feasibility and timeline.
Mailed Missed Payment Notice	State the specific reason a customer was/risks being removed from the program as opposed to outlining the entire list of reasons a customer may be removed	Reviewing planned messages for addition of information	Requires IT work. Evaluating timeline.
	Include a graphic or line for "number of missed payments" for customer reference <sup>4</sup>	Reviewing planned messages for addition of information	Requires IT work. Evaluating timeline.
Self-Serve Web Portal	Provide web portals similar to PG&E to help customers understand AMP. The portal includes a dashboard showing AMP customers' current payment plan status, breakdown of total arrearages to be paid, total amount paid, monthly amount forgiven, and number of missed payments.	Major technology change, need more time to review.	Requires IT work. Evaluating for feasibility and timeline. SoCalGas may be undergoing an update to their CIS system, which may affect our ability to complete this task.

<sup>4</sup> Cal Advocates indicated to include a graphic like SoCalGas, however SoCalGas does not currently have this graphic in any of its communications.

**Cost Recovery**

Pursuant to D.20-06-003 and D.23-08-049,<sup>5</sup> SoCalGas intends to record any incremental costs associated with the proposed changes to its AMP plan, as discussed above, in its Residential Disconnection Protections Memorandum Account (RDPMA),<sup>6</sup> consistent with all other AMP implementation costs.

**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 January 18, 2024. 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 Advice Letter 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**

SoCalGas asserts this submittal is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to General Order (GO) 96-B. SoCalGas respectfully requests that this submittal become effective January 28, 2024, which is 30 calendar days after the date submitted.

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<sup>5</sup> See D.23-08-049, p. 18 and p. 30.

<sup>6</sup> [https://tariff.socalgas.com/regulatory/tariffs/tm2/pdf/tariffs/GAS\\_G-PRELIM\\_RDPMA.pdf](https://tariff.socalgas.com/regulatory/tariffs/tm2/pdf/tariffs/GAS_G-PRELIM_RDPMA.pdf).

**Notice**

A copy of this Advice Letter is being sent to SoCalGas' General Order (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@socialgas.com](mailto:Tariffs@socialgas.com) or call 213-244-2837. For changes to all other service lists, please contact the Commission's Process Office at 415-703-2021 or via e-mail at [Process\\_office@cpuc.ca.gov](mailto:Process_office@cpuc.ca.gov).

/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:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

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