



Staff Report Item 20

TO: East Bay Community Energy Board of Directors

FROM: Feby Boediarso, Regulatory Analyst
Kelly Brezovec, Senior Manager Account Services

SUBJECT: EBCE's Participation in the CPUC-approved Arrearage Management Program (Action Item)

DATE: Wednesday, October 21, 2020

Recommendation

Adopt a Resolution to allow EBCE to participate in the California Public Utilities Commission approved Arrearage Management Program, provided that the CPUC approves a cost recovery approach that uses the Public Purpose Program Charge or similar socialized charge levied on the distribution portion of customers' bills, and to inform PG&E of EBCE's conditional participation.

Background

On June 16, 2020, the California Public Utilities Commission (CPUC, or Commission) issued Decision 20-06-003 to reduce residential customers' disconnections due to nonpayment of electric service. As detailed in the Decision, the Arrearage Management Program (AMP) is a 12-month plan program to help customers who have accumulated significant arrearages to eliminate that debt. The AMP will forgive 1/12 of the customer's arrearages after each monthly on-time payment. After 12 timely payments, the customer's debt will be fully forgiven. Customers can miss up to two non-sequential payments, but only if the customer makes the payment up in the next billing due date, including the current bill amount. If a customer misses more than two non-sequential payments, then they will no longer be eligible to participate in AMP. If a customer drops out of the program prior to the twelve months, there is no impact on the debt that has already been forgiven.

A customer is eligible for AMP if they meet all of the following criteria:

- The customer is enrolled in the California Alternate Rates for Energy (CARE) or Family Electric Rate Assistance (FERA) bill assistance programs for low-income customers.
- The customer has been a PG&E electric distribution customer for a minimum of six months.
- The customer has made at least one on-time payment within 24 months.
- The customer has an account balance that reaches at least \$500 in arrears (or \$250 for gas-only customers) and is at least 90 days old.

Figure 1. PG&E’s AMP Eligible Customer and Debt Estimate for EBCE proposed at the AMP Working Group meeting (8/6/2020) on AMP Eligibility and Forgiveness (by CCA)

CCA	# of Eligible Customers	Estimated AMP Debt Forgiveness			
		Total Eligible Debt Balance	30% of Eligible Customers Participate*	50% of Eligible Customers Participate*	70% of Eligible Customers Participate*
East Bay Community Energy	5,804	\$3.4M	\$505K	\$842K	\$1.2M

*Assumes 50% of enrolled customers complete the full AMP

PG&E estimates that there are 5,804 EBCE customers eligible for AMP in their proposal and expects \$505k to be forgiven if 30% of eligible EBCE customers participate, and half of them complete the program (Figure 1).

Debt Forgiveness Concerns

After the Decision was adopted by the Commission, PG&E, The Utility Reform Network (TURN), California Community Choice Association (CalCCA), and other stakeholders participated in four working groups to address program details and roll-out. One of the topics discussed was how CCAs were to recover their costs of providing debt forgiveness to customers through AMP.

Debt forgiveness for CCAs is complicated by two issues: equity of debt among all CCA customers and the way that partial payments are handled.

1. Inequity among CCA customers

The number of customers that are eligible for this program, as well as the amount of potential debt forgiven, varies from CCA to CCA. Figure 2 shows how four different CCAs might be impacted by a full participation (with half of those customers completing the payment plan) rate in AMP. If each CCA was responsible for debt forgiveness, their customers, overall, would be affected at varying levels - ranging from 55 cents per person to nearly 4 dollars per person. This scenario places additional burden on those CCAs that have a population that is already harmed by high arrearages.

Figure 2: Potential Debt Forgiven by Population Served by CCA

	Debt to Population Ratio
CCA A	\$0.55
CCA B	\$2.03
CCA C	\$2.28
CCA D	\$3.79

2. The payment waterfall effect

Today, partial payments and (non-AMP, standard) payment plan payments are allocated on a pro-rata basis, among PG&E and any third-party providers (namely, CCAs). PG&E is allocating payments this way because, as part of COVID-19 consumer protections, residential customers currently may not be disconnected for their non-payment. As of today, PG&E anticipates maintaining this plan through April 2021.

Starting in April 2021, PG&E intends to re-start their normal business operations, which include disconnecting customers for non-payment. At this time, PG&E plans to also revert to their standard method of allocating residential payments. If a customer makes a partial payment on their energy bill or is placed on a payment plan to pay off a past-due balance, those payments are allocated through a waterfall mechanism. In the waterfall treatment, PG&E's debt is paid first, then the CCA (or other third-party provider) receives its revenues. PG&E handles the payments this way because it considers its costs to be *disconnectable charges* and thus it allocates payments towards disconnectable costs first to prevent a customer from being disconnected.

If a customer has made a series of partial payments under this waterfall payment allocation and then chooses to participate in AMP, the past due balance is disproportionately higher for the third-party provider, or CCA, than for PG&E. The

waterfall payment allocation increases the cost responsibility of CCAs for the arrearage relative to PG&E's responsibility.

Cost-Recovery Mechanism

During the working group, CalCCA strongly advocated that costs of the AMP program's debt forgiveness be recovered from all customers through PG&E's Public Purpose Programs Charge (PPPC). The PPPC is a charge socialized among all customers, and already funds financial assistance programs like CARE, FERA, and the CPUC's Green Tariff disadvantaged community programs. Under CalCCA's proposal, PG&E would add debt forgiveness costs from AMP to collect the charge from all customers, and remit EBCE's portion directly to EBCE.

On September 20, 2020, PG&E filed an Advice Letter stating its support for the PPPC debt forgiveness approach.¹ PG&E has requested that CCAs intending to participate in the AMP program notify PG&E by October 26, 2020. However, PG&E has also stated that it still needs explicit Commission approval in order to adopt the proposed PPPC cost recovery mechanism.² CCAs like EBCE that choose "to participate in AMP prior to the Commission's authorization of the socialized cost recovery approach would be responsible for tracking and recovering unbundled customers' AMP debt forgiveness" related to CCA/EBCE charges.³

Discussion

EBCE supports the AMP objectives and program structure and would like to provide benefits to eligible customers at an especially difficult time. The average eligible customer owes EBCE \$600, and this program can get them on track to reducing this arrearage. EBCE staff recommends that EBCE agree to participate in the AMP if the Commission approves the PPPC, or similar distribution-based socialized allocation, cost recovery approach, and inform PG&E of EBCE's conditional agreement by October 26, 2020.

There are three program funding and participation scenarios:

1. CPUC decides to socialize debt forgiveness using a non-bypassable charge like the PPPC for the entirety of the program and EBCE participates; customers are able to see their PG&E and EBCE debts forgiven over the course of 12 months.
2. The CPUC does not socialize debt forgiveness. EBCE covers the program and absorbs the forgiven debt of participants. This is the worst-case scenario in terms of fiscal impact and staff do not recommend this option.

¹ PG&E Advice Letter 4308-G/5943-E p. 12

² PG&E Advice Letter 4308-G/5943-E p. 13

³ PG&E Advice Letter 4308-G/5943-E p. 14

3. EBCE does not participate in AMP. EBCE's customers may be eligible to participate to have their PG&E-owed debt for the natural gas and electric delivery services forgiven through AMP.

EBCE staff is asking for Board approval now as opposed to waiting for CPUC to approve a cost recovery mechanism in favor of socializing costs so we can streamline the participation process. In PG&E's Advice Letter, it is noted that "if third-party service providers decide to participate at a later date, PG&E will aim to include their customers in the AMP within 45 days of their request."⁴ Hence, EBCE customers can begin receiving AMP benefits on the EBCE portion of their debt starting 45-days post Commission's direction. CPUC's direction is uncertain so staff is recommending we take a proactive approach to participation.

Assuming cost recovery, EBCE staff recommends that the Board approves our participation in the AMP because EBCE can offer a program that provides a path to a fresh start. AMP is also aligned with EBCE's pilot program, Connected Communities, to test interventions that will benefit our customers most impacted by high arrears and/or multiple disconnections. The Alameda County Department of Public Health also presented a white paper in December 2018 titled *Energy Insecurity and Health: Reducing and Avoiding Disconnections*, in hopes of amplifying the stories of everyday residents struggling to pay their usual bills.⁵ These situations are exacerbated due to the health and economic hardships of Covid-19. Arrearages and debts are emotionally-taxing and stress-inducing for the customer. The AMP can give residents an opportunity to have their debt fully forgiven, prompting a new beginning.

Fiscal Impact

EBCE recommends participation in the program based on debt forgiveness that is socialized via a PPPC-like approach, similar to CARE and FERA administration. Assuming EBCE is repaid for debt forgiveness, the fiscal impact to EBCE is limited to staff time and a potential cost to implement the operations component of the program. EBCE does not expect this program to require additional staff. Any required billing operations would be part of the existing budget used for system upgrades and task orders.

Committee Recommendation

This item has not been presented to a Committee.

⁴ PG&E's Advice Letter 4308-G/5943-E p. 14

⁵ [*Energy Insecurity and Health: Reducing and Avoiding Disconnections*](#) published by the Alameda County Department of Public Health, December 2018

Attachments

- A. Resolution Conditionally Approving Participation in the Arrearage Management Program;
- B. CPUC Arrearage Management Program (AMP) Implementation (to present to CAC and Board);
- C. EBCE Disconnection Decision Summary Presentation (for reference); and
- D. CalCCA's Response to PG&E's Advice Letter on AMP Implementation (for reference)

RESOLUTION NO. __**A RESOLUTION OF THE BOARD OF DIRECTORS****OF THE EAST BAY COMMUNITY ENERGY AUTHORITY CONDITIONALLY APPROVING PARTICIPATION IN THE ARREARAGE MANAGEMENT PROGRAM (AMP)**

WHEREAS The East Bay Community Energy Authority (“EBCE”) was formed as a community choice aggregation agency (“CCA”) on December 1, 2016, Under the Joint Exercise of Power Act, California Government Code sections 6500 *et seq.*, among the County of Alameda, and the Cities of Albany, Berkeley, Dublin, Emeryville, Fremont, Hayward, Livermore, Piedmont, Oakland, San Leandro, and Union City to study, promote, develop, conduct, operate, and manage energy-related climate change programs in all of the member jurisdictions. The cities of Newark and Pleasanton, located in Alameda County, along with the City of Tracy, located in San Joaquin County, were added as members of EBCE and parties to the JPA in March of 2020.

WHEREAS in Decision 20-06-003, the California Public Utilities Commission (CPUC) approved a new debt forgiveness payment plan program, referred to as the Arrearage Management Plan (AMP), to assist residential customers who have accumulated significant arrearages to pay down an eliminate that debt.

WHEREAS participating in the AMP would provide EBCE an opportunity to offer assistance to its customers that are experiencing high arrearages.

WHEREAS on September 20, 2020, PG&E filed an Advice Letter stating its support for recovering the costs of debt forgiveness through the Public Purpose Programs Charge (PPPC), but also that it needs explicit approval from the CPUC in order to adopt such a cost recovery mechanism.

WHEREAS PG&E has requested that CCAs intending to participate in the AMP program notify PG&E by October 26, 2020.

WHEREAS EBCE seeks to work with PG&E and the CPUC to ensure that EBCE’s participation in the AMP will support EBCE customers that enroll in the 12-month arrearage management plan without harming non-participating customers.

WHEREAS, the Board of Directors desires for EBCE to participate in AMP at such a time that the CPUC provides PG&E guidance to adopt a socialized cost-recovery approach like the PPPC.

NOW, THEREFORE, THE BOARD OF DIRECTORS OF THE EAST BAY COMMUNITY ENERGY AUTHORITY DOES HEREBY RESOLVE AS FOLLOWS:

Section 1. The Board hereby approves EBCE’s participation in the California Public Utilities Commission-approved Arrearage Management Program, provided that the CPUC approves a cost recovery approach that uses the PPPC or similar socialized charge levied on the distribution portion of customers’ bills.

Section 2. The Board directs staff to inform PG&E of EBCE's conditional participation in the AMP by October 23, 2020.

ADOPTED AND APPROVED this 21st day of October, 2020.

Dan Kalb, Chair

ATTEST:

Stephanie Cabrera, Clerk of the Board



CPUC Arrearage Management Program (AMP) Implementation

PRESENTED BY: Feby Boediarso, Regulatory Analyst
DATE: October 21, 2020



Arrearage Management Plan

Program Eligibility

- CARE/FERA residential customers
- Customer has been a PG&E electric distribution customer for a min. 6 months
- Customer has made at least one on-time payment within 24 months
- Customer has an account balance that reaches at least \$500 in arrears
- ~5,000 eligible EBCE AMP participants

Program Overview

- 12-month payment plan forgives 1/12 of a customer's arrearage after each on-time payment of the existing month's bill.
- After 12 on-time payments, the individual's pre-existing debt will be fully forgiven.
- Customer can miss two non-sequential payments, but need to be made up in the next bill + current bill amount
- IOUs expected to enroll customers in November 2020

CCA	# of Eligible Customers	Estimated AMP Debt Forgiveness			
		Total Eligible Debt Balance	30% of Eligible Customers Participate*	50% of Eligible Customers Participate*	70% of Eligible Customers Participate*
East Bay Community Energy	5,804	\$3.4M	\$505K	\$842K	\$1.2M

*50% of Enrolled Customers Complete the Payment Arrangement

Figure 1. PG&E's AMP Eligible Customer and Debt Estimate for EBCE proposed at the AMP Working Group meeting (8/6/2020) on AMP Eligibility and Forgiveness (by CCA)

Discussion/ Recommendation

Discussion

- PG&E requests that CCAs inform them of our intent to participate in AMP by October 23, 2020
- Cost recovery mechanism is unknown until the Commission provides further guidance
- EBCE staff recommends responding to PG&E that EBCE would like to participate in the AMP, if the Commission proceeds with covering costs through a mechanism like PPC.

Recommendation

- Approves EBCE's participation in the California Public Utilities Commission-approved Arrearage Management Program, provided that the CPUC approves a cost recovery approach that uses the PPC or similar socialized charge levied on the distribution portion of customers' bills.



Disconnection Decision and Next Steps

PRESENTED BY: Feby Boediarso

DATE: July 1, 2020



Disconnection Final Decision (D.20-06-003)

- Led by Commissioner Guzman Aceves
- Goal: Reduce residential customer disconnections
- The Decision was unanimously voted for on June 11, 2020.
- Phase 1 focused on policy adoption, rules, regulations with a goal of reducing the statewide level of disconnections for nonpayment by Jan 1, 2024.
- Phase 2 focused on evaluating disconnections and determining reforms and preventative approaches.
- Decision can [be found here.](#)

Service Disconnection Pilot Programs

Arrearage Management Payment (AMP)

- Manage a customer's arrears through a 12-month plan
- ~80k PG&E customers are eligible (~5,000 EBCE AMP eligible customers)
- Eligibility: CARE/FERA residential customers with \$500 or more in arrears (gas-only \$250 in arrears), customer for min. 6 months, and made 1 on-time payment

Percentage of Income Payment Plans (PIPP)

- Level a customer's monthly bill based on their income
- ~20k customers are eligible
- Eligibility: Only for customers residing in the ten zip codes with the highest disconnection rate in each large IOU territory; households at or below 250% FPL

Arrearage Management Payment (AMP)

- PG&E stated that approximately 78,000 PG&E customers in their territory would qualify, and it would *cost \$139 million* for CCA customers and PG&E customers.
- 12-month payment plan forgives 1/12 of a customer's arrearage after each on-time payment of the existing month's bill.
- After 10 on-time payments, the individual's pre-existing debt will be forgiven.
- Open to CARE and FERA customers at this time; CARE and FERA customers enrolled in AMP are protected from disconnection while participating.
- AMP pilot eligibility be discussed in working group

Other Considerations in the Decision

- Increased transparency between IOUs and CCAs.
 - CCAs will be notified of who and when a customer is disconnected and the notification process (15-day and/or 48-hour shut-off notice) through NDAs
 - IOUs are required to provide ongoing access to information on who has been disconnected in .xlsx or .csv file format

How does this program apply to EBCE?

- Scoping Memo in 2018:
 - What is the role of Community Choice Aggregators in disconnections and should the Commission establish policies as it relates to disconnections that are managed by the interconnecting utility?
- In the past, EBCE presented disconnection history data to inform Decision
- Decision states that IOUs must facilitate participation of CCAs within their territories to discuss enrollment strategies
- Both unbundled and bundled customer are eligible

Cost Recovery Mechanism

- The AMP Program will adopt a two-way balancing account
 - This is to create more transparency and accurately reflect the actual cost of uncollectibles (p. 113)
- PG&E has a mechanism, but the details need to be worked out
- Decision does not address how CCA costs will be recovered
- Commissioner Guzman Aceves mentioned that the utility should recover CCA costs, but not explicit in the Decision
- CalCCA advocated for pro-rata payment (similar to COVID Protection Plan) and cost of arrearage forgiveness run through Public Purpose Funds (similar to CARE)
- To be determined in Phase 2

Phase 2

- The issue of concern raised by CalCCA as it relates to the allocation of proportional recovery shall be discussed in the AMP working group
- Utilities will file a Tier 2 AL and the Commission will issue a resolution
- Timeline and implementation of the PIPP program to be discussed in Phase 2 (Ratesetting proceeding)
 - Are CCAs eligible/required to implement PIPP?
- Expansion of AMP program to non-CARE and non-FERA customers to be considered

Next Steps

- Working Group includes IOUs, TURN, and CalCCA
 - Convene no later than 45 days of issuance **(by July 26)**
 - Specific criteria for pilot within 45-60 days of decision **(by August 10)**
 - Launch of pilot within 90 – 120 days of decision **(by October 9)**
- Citlalli (cleanpowerSF) requested volunteers to participate in the internal working group
 - Internal: writes comments, responds to staff proposals
 - External: figures out cost recovery/ billing mechanisms
 - Meeting tentatively take place: The week of July 13th, week of August 3rd, and week of August 24th
- AMP and PIPP must be established at the expiration of the IOUs' Emergency COVID-19 Implementation Plans (April 2021)

Dates to Consider

- IOUs to file Tier 3 AL within 60 days of issuance on how to increase marketing and outreach efforts with the medical community and county public health offices
 - **Due August 10, 2020**
- IOUs to file Tier 2 AL within 90 days of the Decision to implement AMP plan
 - Cost recovery must be addressed/ establishment of the two-way balancing account
 - **Due September 9, 2020**
- IOUs to file Tier 2 AL within 120 days implementing the establishment of PIPP
 - **Due October 9, 2020**
- IOUs to file Tier 3 AL after two years of PIPP implementation (2022)
- IOUs to file Tier 3 AL after three years of AMP implementation (2023)

Other Questions/Topics (September 2020)

- Communication of data that can be processed by EBCE's accountant and SMUD
- Timeline of PPP charges collection and the start of the AMP program
- Important – timeliness and accuracy of data
 - Accountability
 - Trackability
- What is the process for EBCE to recover costs on behalf of CARE customers?



September 29, 2020

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

By email: EDTariffUnit@cpuc.ca.gov

Re: CalCCA Protest to PG&E AMP Advice Letter in response to Decision 20-06-003

Dear Tariff Unit and Mr. Randolph:

Pursuant to General Order 96-B, the California Community Choice Association (CalCCA)¹ submits this protest to Pacific Gas & Electric Company's Advice Letter 4308-G/5943-E ("Advice Letter").

Pacific Gas & Electric Company (PG&E) filed its Advice Letter on September 9, 2020 in response to Decision ("D") 20-06-003, Ordering Paragraph ("OP") 83 and OP 87.

OP 83: To implement the arrearage management payment (AMP) plan, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and Southern California Gas Company must each file a Tier 2 Advice Letter within 90 days of this decision to implement the AMP plan.

OP 87: The issue of concern raised by CalCCA as it relates to the allocation of proportional recovery shall be discussed in the AMP working group and a proposed resolution shall be set forth in the Tier 2 Advice Letters that Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and Southern California Gas Company file.

¹ CalCCA was formed in 2016 as a trade organization to facilitate joint participation in certain regulatory and legislative matters in which members share common interests. CalCCA's voting membership includes CCAs serving load and others in the process of implementing new service, including: Apple Valley Choice Energy, Baldwin Park Resident Owned Utility District, Central Coast Community Energy, CleanPowerSF, Clean Energy Alliance, Clean Power Alliance, Desert Community Energy, East Bay Community Energy, Lancaster Choice Energy, MCE, Peninsula Clean Energy, Pioneer Community Energy, Pico Rivera Innovative Municipal Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Silicon Valley Clean Energy, Solana Energy Alliance, Sonoma Clean Power, Valley Clean Energy, and Western Community Energy.



While the Advice Letter adequately addresses some requirements established in D. 20-06-003, other provisions do not adequately implement certain requirements or require further clarification.

1. By proposing that the issue of third party cost recovery be addressed in the next phase of R.18-07-005, PG&E fails to fully comply with OP 87.

CalCCA, along with the investor-owned utilities (“IOUs”), The Utility Reform Network (“TURN”), and other parties, participated in a series of AMP Working Group (“AMP WG”) meetings where parties discussed and agreed to various implementation and cost recovery issues included in PG&E’s Advice Letter, one of which was socialization of all AMP debt forgiveness (both IOU and CCA) costs as the preferred method for cost recovery. As expected, PG&E proposes to socialize the recovery of both bundled and unbundled customers’ AMP debt forgiveness among all customers. However, in its Advice Letter PG&E further states that it believes “Commission approval is needed to proceed with third party AMP cost recovery.”²

OP 87 clearly states that a resolution to the issue of cost recovery was to be set forth in the Advice Letters. By proposing to add the topic of cost recovery to “the rate setting phase of the proceeding,”³ PG&E fails to comply with OP 87 and creates an additional obstacle to achieving the Commission’s intent of offering customers, both unbundled and bundled, access to an AMP program that does not burden certain ratepayers more than others through disproportionate cost recovery. At the prehearing conference (PHC) for the Percentage of Income Payment Plan (PIPP) phase of the proceeding held on September 17, 2020 PG&E suggested that the Commission is unable to approve the proposed cost recovery mechanism through an Advice Letter because proper notice has not been provided to affected parties.⁴ This proceeding, however, focused centrally on vulnerable customers, including CARE and FERA customers, making clear that program funding could be affected. Moreover, D.20-06-003 further made clear that the details of cost recovery would be addressed by the AMP WG. Finally, this Advice Letter provides yet another opportunity for comment. By approving the proposed cost recovery without change, the Commission will, indeed, make clear that it has approved this methodology without question, as PG&E requires.

Of further concern to CalCCA is the proposal that “third-party service providers that elect to participate in the AMP prior to Commission authorization of the socialized cost recovery approach would be responsible for tracking and recovering unbundled customers’ AMP debt forgiveness associated with the third party provider’s charges.”⁵ This is troublesome for three

² PG&E Advice Letter at p. 13.

³ PG&E Advice Letter at p. 13.

⁴ PHC Transcript at p. 34.

⁵ PG&E Advice Letter at p. 14.



reasons. First, this implies that all forgiven debt would be recovered solely from the ratepayers that each individual CCA serves and that debt forgiven prior to Commission approval of socialized recovery, under PG&E’s proposal, would not be eligible for socialized cost recovery once it is approved by the Commission. This would disproportionately burden CCA communities with higher AMP participation than others. Second, CCAs have no certainty about a timeline for when the issue of cost recovery could be resolved. Indeed, PG&E proposed in the recent PHC addressing the PIPP that AMP cost recovery be addressed in the PIPP working group, and the Administrative Law Judge indicated that he anticipates an 18 month resolution to the PIPP phase.⁶ Third, taking PG&E’s approach would leave CCAs with no certainty of the ultimate outcome, which would discourage CCA participation in the AMP program.

Furthermore, PG&E is requesting that CCAs in its territory notify it “within 45 days of this AL regarding their intent to participate.”⁷ CCAs are being asked to make a determination about participation in the AMP without knowing if their participation risks ultimately burdening their ratepayers with disproportionate cost recovery. CCAs have and continue to be supportive of the AMP and would like to be able to offer their unbundled customers access to the program, especially since many customers face economic hardship due to the COVID-19 pandemic. However, PG&E’s proposal makes CCA participation in the program difficult because neither the magnitude of the potential financial impact of participating in the program before socialized cost recovery is approved nor the timeline for third-party cost recovery to be authorized are known. CalCCA requests that PG&E clarify whether the requested 45 day notification is 45 days after the disposition of the Advice Letter or 45 days after the date it was filed. If PG&E requests notification 45 days after the date the Advice Letter was filed, CalCCA requests that the Commission provide guidance on cost-recovery through approval of the AMP Advice Letters prior to the 45 day mark.

2. PG&E did not adequately address what information it will provide CCAs that notify PG&E they intend to participate the AMP.

With respect to coordination with third-party providers, PG&E states that it is “coordinating with the CCAs to determine the customer information that PG&E must share with the CCAs to enroll customers in the program as well as the appropriate channels to provide that information in a secure and efficient manner.”⁸ CalCCA is unaware of any coordination or outreach to CCAs besides the coordination that occurred as part of the AMP WG. Given that the AMP WG spent substantial time discussing the data that would need to be communicated to CCAs to enable third-party participation and that CalCCA provided tables specifying the requested information, CalCCA is surprised that PG&E failed to include any mention of the specific data that would be shared with CCAs. Under the situation proposed by PG&E, where CCAs would be responsible for tracking and recovering all forgiven debt prior to a Commission

⁶ PHC Transcript at p. 20.

⁷ PG&E Advice Letter at p. 14.

⁸ PG&E Advice Letter at p. 13.



approval of socialized cost recovery, the data that is communicated to the CCAs is of central importance. For example, CCAs have no visibility into the amounts owed to the IOU. Because eligibility is determined based on both IOU and third-party arrears, a CCA would have no way of knowing with certainty which of its customers are eligible for the AMP or which have enrolled. Additionally, the dollar value of arrears that are expected to be forgiven, the value of forgiven amounts that have been processed, and whether a customer has made the monthly payment it was supposed to make and is still in good standing in the program must be communicated to the CCAs that participate in the program.

CalCCA agrees with PG&E that “existing channels to share required information” should be leveraged. However, what specifically that information is should be added to the Advice Letter or PG&E should set up regular meetings related to AMP data needs with CCAs to ensure program alignment and streamlined customer enrollment. Finally, PG&E uses the word “required” to describe the information that it intends to share with CCAs. CalCCA requests that PG&E clarify what it means and whether it is stating that only information required by the Commission to be shared to CCAs would be shared.

We thank the Commission for its consideration of this protest and urge the Commission to require PG&E to re-file its Advice Letter so that it includes the information it plans to share with CCAs that intend to participate in the AMP and a proposal for how it intends to track and recover all forgiven bad debt, including third-party charges.

Respectfully submitted,

Evelyn Kahl
General Counsel to the
California Community Choice Association

cc: PGETariffs@pge.com
Service List R. 18-07-005