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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to
Address Energy Utility Customer Bill
Debt Accumulated During the
COVID-19 Pandemic.

Rulemaking 21-02-014

**ADMINISTRATIVE LAW JUDGE'S RULING
DIRECTING UTILITY ACTION TO LEVERAGE FEDERAL
FUNDING AVAILABLE FOR UTILITY ARREARAGES**

On March 12, 2021, seven parties including Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), Southern California Edison Company (SCE), and Southern California Gas Company (SoCalGas) (Large Investor-owned Utilities or IOUs) requested the Commission dedicate more time to efforts to maximize the availability of federal funding to help customers with utility debt. At the workshop on *Proposals to Address COVID-19 Related Arrearages of Residential and Small Business Customers* held March 25 - 26, 2021, the State of California's Housing and Community Development (HCD) representative described California's Emergency Rental Assistance Program (ERAP) that began accepting applications on March 15, 2021.¹ \$2.6 billion is available for eligible California renters to assist with 100% of energy, water and communications utility arrearages. Party comments at the workshop generally agree on the urgency of leveraging external resources to address utility customer arrearages. The Commission has little

¹ See HCD's informational website for local governments, tribes and utilities here: <https://www.hcd.ca.gov/grants-funding/active-funding/erap.shtml>

information on the utilities’ progress to-date in assisting customers with accessing the HCD ERAP relief funding. The actions we direct today are intended to confirm the process is functional, and that utility customers can access the resources that have been made available. Furthermore, the actions we direct today are intended to expose any barriers to accessing the HCD ERAP relief funding so that barriers may be promptly addressed.

Today’s Ruling directs IOUs as well as PacifiCorp, Liberty Utilities (CalPeco Electric) LLC, Bear Valley Electric Company, Inc. (Bear Valley), and Southwest Gas Corporation (Southwest Gas) to take steps to confirm its customers are able to secure the HCD ERAP relief funding available for utility arrearages.

Each IOU and Southwest Gas should work in concert with all water utilities with whom they already exchange low-income data, to identify a sample group of customers with whom they will directly engage and assist to apply for HCD ERAP relief funding. Each IOU and Southwest Gas will confer with each water utility with whom they overlap and exchange low-income data, as displayed below.

Class A Water Utility	PG&E	SCE	SCG	SDG&E	Southwest Gas	Total Data Exchange Partners
California Water Service Company	X	X	X			3
California-American Water Company	X	X	X	X		4
Golden State Water Company	X	X	X		X	4
Great Oaks Water Company	X					1
Liberty Utilities - Apple Valley Ranchos		X			X	2

Liberty Utilities - Park Water		X	X			2
San Jose Water Company	X					1
San Gabriel Valley Water Company		X	X			2
Suburban Water Systems			X			1
Total Data Exchange Partners	5	6	6	1	2	

For each pair of energy and water utilities, each IOU and Southwest Gas will identify a pool of willing and likely eligible customers for whom they will provide case management through all steps of the application process until the customers’ arrearages are paid through ERAP. The pool of customers must be large enough to result in at least five willing and likely eligible customers applying through each Local Service Provider administering the HCD ERAP, as well as at least fifteen customers applying through the statewide online portal.²

Each IOU and Southwest Gas should develop a second sample of at least 20 willing and likely eligible customers beyond those subject to the low-income data exchange process between energy and water utilities, because eligibility for HCD is broader than the eligibility of the low-income programs of the energy and water utilities. After identifying and selecting the pools of likely eligible utility customers willing to apply, the energy utility will provide case management to the customers, following the progress and steps of each customer, and, as necessary, assisting each customer with uploading their utility bills during the application process, verifying the customer at the request of the

² Local Service Providers are listed on the Housing is Key website https://housing.ca.gov/covid_rr/partner_resources.html

HCD ERAP and/or the LSP, and finally identifying when the payment of the utility arrearage is credited to the customer account.

PacifiCorp, CalPeco Electric, and Bear Valley are also directed to assist their customers in securing HCD ERAP funding and to report back weekly on their progress. PacifiCorp, CalPeco Electric and Bear Valley should each identify at least ten willing and likely eligible customers to case-manage through the application process with HCD ERAP.

Utilities should update the Commission weekly on their tracking of applicants to HCD ERAP. Specifically, utilities must report, by water utility and by LSP sample group, the number of customers that have agreed to apply to HCD ERAP, the number that applied, the number for whom verification has been provided to ERAP, and the number and amount and/or percentage of arrearage relief paid. No personally-identifying customer information is necessary for this reporting. Beginning on April 12, 2021, utilities should send weekly reports to the Commission's Energy Division via email to Benjamin Menzies at Benjamin.menzies@cpuc.ca.gov.

Utilities may utilize their own methods to identify eligible and willing customers including, but not limited to:

- For residential accounts in arrears, identifying service addresses for whom the billing address is different than service address;
- For residential accounts in arrears, identifying accounts newly opened in the last two years; and
- Other reasonable methods.

When reaching out to potentially willing and eligible customers, utilities should clarify that applicants need not have rental debt in order to qualify for assistance with utility debt. As some jurisdictions may have decided to prioritize

rental debt, utilities may wish to confirm with each jurisdiction and/or Local Service Provider that utility debt is currently being considered for relief.

IT IS RULED that:

1. Pacific Gas and Electric Company, California Edison Company, San Diego Gas & Electric Company, Southern California Gas Company and Southwest Gas Corporation are directed to identify a pool of willing and likely eligible customers as described above and track and report the customers' application status to the California Housing and Community Development Emergency Rental Assistance Program via email to Benjamin Menzies beginning on April 12, 2021 and continuing weekly thereafter until all customers in the sample have either had their arrearages paid or their applications denied.

2. PacifiCorp, Liberty Utilities and Bear Valley Electric Company, Inc. are directed to identify a pool of willing and likely eligible customers as described above and track and report the customers' application status to the California Housing and Community Development Emergency Rental Assistance Program via email to Benjamin Menzies beginning on April 12, 2021 and continuing weekly thereafter until all customers in the sample have either had their arrearages paid or their applications denied.

Dated April 5, 2021, at San Francisco, California.

/s/ CAMILLE WATTS-ZAGHA

Camille Watts-Zagha
Administrative Law Judge