



# ADVICE LETTER SUMMARY

## ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Bear Valley Electric Service, Inc (913-E)

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Nguyen Quan

Phone #: (909) 394-3600 x664

E-mail: RegulatoryAffairs@bvesinc.com

E-mail Disposition Notice to: RegulatoryAffairs@bvesinc.com

### EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas      WATER = Water  
 PLC = Pipeline      HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 417-E

Tier Designation: 2

Subject of AL: BVES Transition Plan for discontinuance of COVID-19 Customer Protections after June 30, 2021 - Resolution M-4849

Keywords (choose from CPUC listing): Compliance

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Resolution M-4849

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: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: 5/2/21

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>: See Advice Letter

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: Nguyen Quan  
Title: Regulatory Affairs Manager  
Utility Name: Bear Valley Electric Service, Inc  
Address: 630 E. Foothill Blvd  
City: San Dimas State: California  
Telephone (xxx) xxx-xxxx: (909) 394-3600 x664  
Facsimile (xxx) xxx-xxxx: (909) 394-7427  
Email: [RegulatoryAffairs@bvesinc.com](mailto:RegulatoryAffairs@bvesinc.com); [nquan@gswater.com](mailto:nquan@gswater.com)

Name: Zeng Zhu  
Title: Rate Analyst  
Utility Name: Bear Valley Electric Service, Inc  
Address: 630 E. Foothill Blvd  
City: San Dimas State: California  
Telephone (xxx) xxx-xxxx: (909) 394-3600 x495  
Facsimile (xxx) xxx-xxxx: (909) 394-7427  
Email: [RegulatoryAffairs@bvesinc.com](mailto:RegulatoryAffairs@bvesinc.com); [zeng.zhu@bvesinc.com](mailto:zeng.zhu@bvesinc.com)



Bear Valley Electric Service, Inc.  
P.O. Box 9028  
San Dimas, CA 91773-9028  
A Subsidiary of American States Water Company

April 1, 2021

Advice Letter No. 417-E

(U 913 E)

## California Public Utilities Commission

Bear Valley Electric Service, Inc. ("BVES") hereby transmits for filing the following:

**SUBJECT:** *BVES Transition Plan for discontinuance of COVID-19 Customer Protections after June 30, 2021 - Resolution M-4849.*

### **PURPOSE**

Pursuant to Resolution No. ("R.") M-4849, BVES requests from the California Public Utilities Commission ("Commission" or "CPUC") approval of its COVID-19 customer protections Transition Plan ("the Plan") as ordered by Resolution M-4849.

This Advice Letter ("AL") is in compliance with Ordering Paragraph No. ("OP") 5 of Resolution M-4849 (see Attachment B).

### **BACKGROUND**

On March 4, 2020, California Governor Gavin Newsom declared a State of Emergency ("SOE") for the State of California, in order to combat and minimize the threat of COVID-19.

On March 16, 2020, Governor Newsom issued Executive Order N-28-20<sup>1</sup> ordering the CPUC to monitor any customer service protection measures and policies enacted by public and private utilities in response to COVID-19.

In response to Governor Newsom's orders, on March 17, 2020, CPUC Executive Director Alice Stebbins issued a letter to electric utilities. The letter served as notification that the CPUC intends to monitor and provide emergency customer protection measures for California customers during this emergency.

On April 16, 2020, The Commission issued Resolution M-4842 (see Attachment A) directing utilities to implement customer protections in response to the SOE. As directed, BVES filed Tier 1 AL 385-E and 385-EA establishing its customer COVID-19 protection. The Commission approved BVES AL 385-EA on August 18, 2020.

---

<sup>1</sup> Executive Order N-28-20, available at: <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.16.20-Executive-Order.pdf>

**RESOLUTION M-4849 TRANSITION PLAN**

On February 11, 2021, the Commission adopted Resolution M-4849 extending the Emergency Customer Protections for residential and small business customers through June 30, 2021. Resolution M-4849 directs utilities file a Tier 1 Advice Letter describing all reasonable and necessary actions to extend the Emergency Customer Protections contained in Resolution M-4849 to support California customers through June 30, 2021. On February 16, 2021, BVES filed AL 412-E extending its protections through June 30, 2021.

Resolution M-4849 Ordering Paragraph No. 6 states:

*6. By February 25, 2021, electric, gas, and water corporations subject to this Resolution shall submit drafts of Transition Plan Advice Letters to CPUC staff (Gillian.Weaver@cpuc.ca.gov), who will share them with the LIOB.*

BVES submitted its draft Transition Plan to the Commission on February 25, 2021.

On March 11, 2021, BVES presented its Transition Plan at the Low-Income Oversight Board (“LIOB”) quarterly meeting.

Furthermore, Resolution M-4849 orders BVES to file Tier 2 advice letter detailing its Transition Plan following the recommendations of the Low-Income Oversight Board.

Resolution M-4849 Ordering Paragraph No. 5 states:

*5. Electric, gas, and water corporations subject to this Resolution shall each file Tier 2 Advice Letter with their transition plans for the expiration of Emergency Customer Protections by April 1, 2021. The transition plans shall include 1) a timeline of new start and resumed activities, 2) a marketing, education and outreach (ME&O) strategy, 3) an explanation of the activities timeline and ME&O strategy accounts for compliance and safety, and 4) a progress tracking and reporting plan. The goal of the transition plan is to proactively enroll customers in programs to manage their utility bills and inform relevant customers of the changes to programs they are already on, to effectively ease customers through a transition off of Emergency Customer Protections. Electric and gas corporations shall serve copies of the Advice Letters to R.18-03-011, A. 14-11-007, A.15-02-001, A.19-11-003, A.20-03-014, R.15-03-010, R.18-07-006, R.18-07-005, R.12-06-013, and A.19-09-014 proceeding service lists. Water corporations shall serve copies of the Advice Letters to R.18-03-011 and R.17-06-024 proceeding service lists.*

On March 22, 2021, Energy Division provided recommendations to BVES’s plan. On March 24, 2021, the LIOB provided recommendations to BVES’s plan. BVES reviewed Energy Division and LIOB’s recommendations. BVES addresses the recommendations from both Energy Division and LIOB in this advice letter, and incorporated recommendations into its Plan where applicable.

BVES includes in this advice letter its Transition Plan for Commission review and approval. See attachment C.

### **RECOMMENDATIONS FROM THE COMMISSION**

After review of BVES's draft Transition Plan, Energy Division proposed recommendations to BVES.

1. Report number of customers that participate in a payment plan that are 6-month or longer. According to the LIOB presentation, all SMJUs will offer customers payment arrangements from 6 months up to 12 months.

*Response: See section V. of BVES's Transition Plan.*

2. If applicable, please discuss data exchange of low-income customers with water utilities, as directed in Resolution M-4849

*Response: See section III.E of BVES's Transition Plan. BVES has conducted routine data exchange of low-income customers with other utilities, such as Southwest Gas. BVES will reach out to the City of Big Bear Lake Department of Water and Power to inquire about data sharing process.*

3. Discuss leveraging CBOs and/or LIHEAP service providers for outreach

*Response: See section III.E of BVES's Transition Plan.*

### **RECOMMENDATIONS FROM LOW-INCOME OVERSIGHT BOARD**

After review of BVES's draft transition plan, the LIOB proposed recommendations to BVES.

1. Extreme Climate Protections

*Response: BVES has an existing policy on this matter. Pursuant to BVES company policy, BVES does not disconnect customers when temperature is below 32 degree Fahrenheit. In addition, BVES has an existing Emergency Disaster Plan required by D.19-07-015. However, LIOB acknowledges this recommendation is outside the scope of Resolution M-4849.*

2. Increase CARE Subsidies for the Most Vulnerable to 50% as Part of AMP

*Response: BVES's CARE program is evaluated and approved in a separate Commission proceeding. BVES believes this recommendation is outside the scope of this proceeding.*

3. CARE Data Sharing for Water Utilities

*Response: See section III.E of BVES's Transition Plan. BVES has conducted routine data exchange of low-income customers with Southwest Gas, which also serves BVES customers. BVES will reach out to the City of Big Bear Lake Department of Water and Power to inquire about data sharing process.*

4. Marketing and Outreach

*Response: BVES does not have tribal lands or tribal communities, or customers considered disadvantaged/underserved or hard-to-reach in its service territory. Furthermore, Resolutions M-4842 and M-4849 already provide BVES flexibility in its spending. BVES is authorized to record incremental costs in its COVID-19 Pandemic Protection Memorandum Account.*

5. Define and Measure Success

*Response: See section V. of BVES's transition plan.*

6. Aliso Canyon Best Practices

*Response: BVES's ESA program is evaluated and approved by the Commission in a separate proceeding. BVES believes this recommendation is outside the scope of this proceeding.*

7. Coordination with LIHEAP

*Response: See section III.E of BVES's Transition Plan. BVES is amiable to data sharing with other stakeholders such as the Low Income Home Energy Assistance Program ("LIHEAP"). However, the LIHEAP program is a federally funded program via grants to local governments that may have restrictions for data sharing. BVES believes that the Commission should address the coordination with LIHEAP in a separate proceeding.*

8. Referral to Weatherization and Other Programs as Part of AMP.

*Response: See section II.E of BVES's Transition Plan. When assisting customers, BVES will identify and refer customers to other program the customer may qualify for.*

**COMPLIANCE**

This advice letter requests approval in compliance with Resolution M-4849.

**ATTACHMENT**

Attachment A: Resolution M-4842

Attachment B: Resolution M-4849

Attachment C: COVID-19 EMERGENCY CUSTOMER PROTECTIONS TRANSITION PLAN

**TIER DESIGNATION**

This advice letter is submitted with a Tier 2 designation.

**EFFECTIVE DATE**

BVES respectfully requests this advice letter becomes effective on May 2, 2021.

**NOTICE AND PROTESTS**

A protest is a document objecting to the granting in whole or in part of the authority sought in this advice letter. A response is a document that does not object to the authority sought, but nevertheless presents information that the party tendering the response believes would be useful to the CPUC in acting on the request.

A protest must be mailed within 20 days of the date the CPUC accepts the advice letter for filing. The Calendar is available on the CPUC's website at [www.cpuc.ca.gov](http://www.cpuc.ca.gov).

A protest must state the facts constituting the grounds for the protest, the effect that approval of the advice letter might have on the protestant, and the reasons the protestant believes the advice letter, or a part of it, is not justified. If the protest requests an evidentiary hearing, the protest must state the facts the protestant would present at an evidentiary hearing to support its request for whole or partial denial of the advice letter.

The utility must respond to a protest within five days.

**All protests and responses should be sent to:**

California Public Utilities Commission, Energy Division  
ATTN: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102  
E-mail: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

Copies of any such protests should be sent to this utility at:

Bear Valley Electric Service, Inc.  
ATTN: Nguyen Quan  
630 East Foothill Blvd.  
San Dimas, CA 91773  
Fax: 909-394-7427  
E-mail: [RegulatoryAffairs@bvesinc.com](mailto:RegulatoryAffairs@bvesinc.com)

If you have not received a reply to your protest within 10 business days, contact

Nguyen Quan at (909) 394-3600 ext. 664.

**Correspondence:**

Any correspondence regarding this compliance filing should be sent by regular mail or e-mail to the attention of:

Nguyen Quan  
Manager, Regulatory Affairs  
Bear Valley Electric Service, Inc.  
630 East Foothill Blvd.  
San Dimas, California 91773  
Email: [RegulatoryAffairs@bvesinc.com](mailto:RegulatoryAffairs@bvesinc.com)

The protest shall set forth the grounds upon which it is based and shall be submitted expeditiously. There is no restriction on who may file a protest.

Sincerely,

/s/Zeng Zhu

Zeng Zhu

Rate Analyst, Regulatory Affairs

cc: Edward Randolph, Deputy Executive Director, Energy Division  
Franz Cheng, Energy Division  
R. Mark Pocta, California Public Advocates Office  
BVES General Order 96-B Service List



**BEAR VALLEY ELECTRIC SERVICE, INC.**

**G.O. 96-B**  
**SERVICE LIST**

AGNES ROBERTS, FINANCIAL ANALYST  
[AGNES.ROBERTS@BBCCSD.ORG](mailto:AGNES.ROBERTS@BBCCSD.ORG)  
EMAIL ONLY

CITY CLERK  
CITY OF BIG BEAR LAKE  
39707 BIG BEAR BLVD.  
P.O. BOX 10000  
BIG BEAR LAKE, CA 92315

CITY ATTORNEY  
CITY OF BIG BEAR LAKE  
39707 BIG BEAR BLVD.  
P.O. BOX 10000  
BIG BEAR LAKE, CA 92315

COUNTY CLERK  
COUNTY OF SAN BERNARDINO  
385 N. ARROWHEAD AVENUE - 2<sup>ND</sup> FLOOR  
SAN BERNARDINO, CA 92415-0140

COUNTY COUNSEL  
COUNTY OF SAN BERNARDINO  
385 N. ARROWHEAD AVENUE - 4<sup>TH</sup> FLOOR  
SAN BERNARDINO, CA 92415-0140

HERSCHEL T. ELKINS  
ASST ATTORNEY GENERAL  
OFFICE OF THE ATTORNEY GENERAL  
STATE OF CALIFORNIA  
300 SOUTH SPRING STREET  
LOS ANGELES, CA 90013

ERIC JANSSEN  
ELLISON, SCHNEIDER & HARRIS LLP  
2600 CAPITOL AVE., STE. 400  
SACRAMENTO, CA 95816-5905  
[ERICJ@ESLAWFIRM.COM](mailto:ERICJ@ESLAWFIRM.COM)

WADE REESER, VP, OPERATIONS  
BIG BEAR MOUNTAIN RESORTS  
P.O. BOX 77, 880 SUMMIT BLVD.  
BIG BEAR LAKE CA 92315  
[WREESER@MAMMOTHRESORTS.COM](mailto:WREESER@MAMMOTHRESORTS.COM)

PETER EICHLER  
LIBERTY UTILITIES  
2865 BRISTOL CIRCLE  
OAKVILLE, ONTARIO L6H 7H7  
[PETER.EICHLER@LIBERTYUTILITIES.COM](mailto:PETER.EICHLER@LIBERTYUTILITIES.COM)

MIKE LONG  
CALIFORNIA PACIFIC ELECTRIC CO., LLC  
933 ELOISE AVENUE  
SOUTH LAKE TAHOE, CA 96150  
[MIKE.LONG@LIBERTY-ENERGY.COM](mailto:MIKE.LONG@LIBERTY-ENERGY.COM)

RANDLE COMMUNICATIONS  
500 CAPITOL MALL, SUITE 1950  
SACRAMENTO, CA 95814  
[MCARDONA@RANDLECOMMUNICATIONS.COM](mailto:MCARDONA@RANDLECOMMUNICATIONS.COM)  
[MGAZDA@RANDLECOMMUNICATIONS.COM](mailto:MGAZDA@RANDLECOMMUNICATIONS.COM)

MEGAN SOMOGYI  
GOODIN, MACBRIDE, SQUERI & DAY, LLP  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111  
[MSOMOGY@GOODINMACBRIDE.COM](mailto:MSOMOGY@GOODINMACBRIDE.COM)

FRED YANNEY, YANNEY LAW OFFICE  
17409 MARQUARDT AVENUE, UNIT C-4  
CERRITOS, CA 90703  
[FREDYANNEY@GMAIL.COM](mailto:FREDYANNEY@GMAIL.COM)

BRENT TREGASKIS  
BEAR MOUNTAIN RESORT  
P O BOX 77  
BIG BEAR LAKE, CA 92315

SOUTHERN CALIFORNIA EDISON CO.  
P. O. BOX 800  
ROSEMEAD, CA 91770

PATRICK O'REILLY  
OPR COMMUNICATIONS  
19318 JESSE LANE, SUITE 200  
RIVERSIDE, CA 92508  
[POREILLY@OPRUSA.COM](mailto:POREILLY@OPRUSA.COM)

ARLENE HERRERA  
OPR COMMUNICATIONS  
19318 JESSE LANE, SUITE 200  
RIVERSIDE, CA 92508  
[AHERRERA@OPRUSA.COM](mailto:AHERRERA@OPRUSA.COM)

NAVAL FACILITIES ENGINEERING COMMAND  
REA. D. ESTRELLA  
SOUTHWEST DIVISIONM  
1220 PACIFIC HIGHWAY  
SAN DIEGO, CA 92132  
[REA.ESTRELLA@NAVY.MIL](mailto:REA.ESTRELLA@NAVY.MIL)

LIBERTY UTILITIES  
9750 WASHBURN ROAD  
DOWNEY, CA 90241  
[AdviceLetterService@libertyutilities.com](mailto:AdviceLetterService@libertyutilities.com)

# **ATTACHMENT A**

**Resolution M-4842**

Date of Issuance  
April 17, 2020

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

**EXECUTIVE DIVISION**

**San Francisco, California  
Date: April 16, 2020  
Resolution M-4842**

**R E S O L U T I O N**

**EMERGENCY AUTHORIZATION AND ORDER DIRECTING  
UTILITIES TO IMPLEMENT EMERGENCY CUSTOMER  
PROTECTIONS TO SUPPORT CALIFORNIA CUSTOMERS  
DURING THE COVID-19 PANDEMIC**

**SUMMARY**

The Commission issues this Resolution on its own motion in response to Governor Gavin Newsom’s declaration of a state of emergency and issuance of executive orders due to the novel coronavirus (COVID-19) pandemic. This Resolution ratifies directions provided by the Commission’s Executive Director on March 17, 2020 to energy, water and communications corporations to retroactively apply customer protection measures from March 4, 2020 onward – during the pendency of the COVID-19 pandemic.<sup>1</sup>

Specifically, this Resolution orders electric, gas, communications, and water and sewer corporations in California to file a Tier 2 Advice Letter describing all reasonable and necessary actions to implement the Emergency Customer Protections contained in this resolution to support California customers; and authorizes the electric, gas, communications, and water and sewer corporations to establish memorandum accounts to track incremental costs associated with complying with this resolution. The Emergency Customer Protections apply to customers for up to one year from the date of this resolution.

---

<sup>1</sup>

[https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News\\_Room/NewsUpdates/2020/Exec%20Director%20Letter%20to%20Energy%20Companies%20re%20COVID19%20March%2017,%202020.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2020/Exec%20Director%20Letter%20to%20Energy%20Companies%20re%20COVID19%20March%2017,%202020.pdf);

[https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News\\_Room/NewsUpdates/2020/Exec%20Director%20Letter%20to%20Water%20Companies%20re%20COVID-19%20March%2017,%202020.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2020/Exec%20Director%20Letter%20to%20Water%20Companies%20re%20COVID-19%20March%2017,%202020.pdf)

[https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News\\_Room/NewsUpdates/2020/Exec%20Director%20Letter%20to%20Communications%20Companies%20re%20COVID-19%20March%2017,%202020.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2020/Exec%20Director%20Letter%20to%20Communications%20Companies%20re%20COVID-19%20March%2017,%202020.pdf)

**BACKGROUND**

On March 4, 2020, Governor Newsom declared a State of Emergency in California related to COVID-19; there were 53 known cases of COVID-19 in California, and officials expected the number of cases to increase.<sup>2</sup>

The Governor has taken additional actions, including:

- Issuing a new Executive Order<sup>3</sup> recognizing that individuals exposed to COVID-19 may be unable to report to work due to illness or quarantines, and ordering numerous measures including social distancing;
- Issuing an Executive Order<sup>4</sup> requesting that the Commission monitor the measures undertaken by public and private utility providers to implement customer service protections in response to COVID-19;
- Issuing a statewide shelter-in-place order directing Californians to remain in their homes except to meet essential needs;<sup>5</sup> and
- Deploying the California National Guard to assist California's food banks, which have been affected by a drop in volunteers and a disruption to the food distribution infrastructure.<sup>6</sup>

By April 1, 2020, the number of confirmed COVID-19 cases in California had risen to 9,191, with 203 deaths.<sup>7</sup> The situation is rapidly evolving, and the number of confirmed cases is predicted to continue rising.

Some companies have already implemented emergency protections in response to the COVID-19 pandemic, including but not limited to:

---

<sup>2</sup> <https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-help-state-prepare-for-broader-spread-of-covid-19/>

<sup>3</sup> Executive Order N-25-20, available at <https://www.gov.ca.gov/wpcontent/uploads/2020/03/3.12.20-EO-N-25-20-COVID-19.pdf>

<sup>4</sup> Executive Order N-28-20, available at <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.16.20-Executive-Order.pdf>

<sup>5</sup> <https://covid19.ca.gov/stay-home-except-for-essential-needs/>

<sup>6</sup> <https://www.gov.ca.gov/2020/03/20/governor-newsom-deploys-california-national-guard-to-help-distribute-food-at-food-banks-protect-californias-most-vulnerable/>

<sup>7</sup> <https://www.cdph.ca.gov/covid19>

- Observing a moratorium on electric and gas service disconnections for nonpayment and waiving late fees;<sup>8</sup>
- Signing the Federal Communications Commission’s Keep Americans Connected Pledge to open wi-fi hotspots and observe a moratorium on internet service disconnections for nonpayment;<sup>2</sup>
- Boosting broadband speeds and lifting data caps.<sup>10</sup>

The Commission takes specific action in this Resolution, in response to the Governor’s emergency proclamation and executive orders, to provide continuity and consistency between all utility actions resulting from the COVID-19 pandemic.

## **DISCUSSION**

The response to COVID-19 has been extremely disruptive to all Californians and has impacted many Californians’ ability to work. The Commission has dealt with highly disruptive events, most recently with the devastating wildfires in Northern and Southern California. In response to reoccurring natural and manmade disasters, the Commission initiated a disaster relief Rulemaking ((R.) 18-03-011) and adopted a series of requirements for utility companies (electric, gas, water and sewer) and communications providers, culminating in customer protection measures adopted in decisions (D.)19-07-015 and D.19-08-025.

The customer protection measures adopted in R.18-03-011 apply in cases where a gubernatorial or presidential declared emergency relates to the disruption or degradation of service. The COVID-19 pandemic represents a different type of emergency, one where the threat --in this case, a virus-- necessitates a response which impacts Californians’ ability to pay for utility service. Social distancing and shelter-in-place requirements have required the closure of non-essential businesses including bars, dine-in restaurants, and shops, and subsequent employee layoffs have created a risk that customers may fall behind on utility payments due to the COVID-19 pandemic at the same time that shelter in place orders will likely cause increased usage of utility services resulting in higher utility bills.

---

<sup>8</sup> [https://www.pge.com/en\\_US/about-pge/company-information/protective-protocols/covid19.page?WT.mc\\_id=Vanity\\_covid19](https://www.pge.com/en_US/about-pge/company-information/protective-protocols/covid19.page?WT.mc_id=Vanity_covid19); <https://www.sce.com/safety/coronavirus>; <https://www.sdge.com/coronavirus>

<sup>2</sup> <https://www.fcc.gov/keep-americans-connected>

<sup>10</sup> <https://www.consumerreports.org/internet-providers/isps-respond-to-coronavirus-raise-speeds-suspend-data-caps-keep-america-connected-pledge/>

Having access to essential utility services is critical to maintaining Californians' health and safety during the COVID-19 pandemic. Therefore, due to the COVID-19 pandemic, the Commission extends to California customers the emergency customer protections from D.19-07-015 and D.19-08-025, through April 16, 2021, with an option to extend. The Commission takes this action in response to extraordinary circumstances and the state of emergency to ensure continuity of essential service to customers during this health and safety crisis. This Resolution does not establish precedent for standard Commission ratemaking or customer protection processes.

All residential and small business customers in California are eligible for the emergency customer protections set forth in this Resolution.

These customer protections are a floor, not a ceiling.<sup>11</sup> As we stated in D.19-07-015 and D.19-08-025, we support and encourage the utilities and communications service providers to do more to help Californians in this time of need.<sup>12</sup> The utilities and communications service providers have the discretion to add additional customer relief efforts that are unique to their customers' experience, or the specific type of damage a customer may suffer from as a result of COVID-19.<sup>13</sup> In addition, we acknowledge that some of the provisions adopted in D.19-07-015 and D.19-08-025 in response to disasters such as earthquakes and wildfires may not apply in the case of a pandemic; for example, the requirement that electric and gas utilities identify the premises of affected customers whose utility service has been disrupted or degraded and discontinue billing these premises without assessing a disconnection charge. If the electric, gas, communication, and water corporations subject to this Resolution believe that specific provisions from D.19-07-015 and D.19-08-025 do not apply during the pandemic, they shall identify such provisions in their Advice Letters and provide a justification for why they believe the provisions do not apply.

### **Emergency Customer Protections for Electric and Gas Utility Customers**

The electric and gas utilities under this Commission's jurisdiction subject to this Resolution are the following: (1) Pacific Gas & Electric Company; (2) Southern California Edison Company; (3) San Diego Gas and Electric Company; (4) Southern California Gas Company; (5) PacifiCorp; (6) Liberty Utilities (CalPECO Electric) LLC; (7) Bear Valley Electric Service (a division of Golden State Water Company); (8) Southwest Gas Corporation; (9) Alpine Natural Gas, Inc.; (10) West Coast Gas Company, Inc.; and (11) Catalina Island Gas Services.

---

<sup>11</sup> D.19-07-015 at 24-25; *see also* D.19-08-025 at 34.

<sup>12</sup> *Id.*

<sup>13</sup> *Id.*

The electric and gas utilities subject to this Resolution shall take the following immediate actions and file a Tier 2 Advice Letter no later than 15 days after this Resolution's approval demonstrating compliance to the Commission's Energy Division:<sup>14</sup>

- (1) waive deposit requirements for residential customers seeking to reestablish service for one year and expedite move in and move out service requests;
- (2) stop estimated usage for billing attributed to the time period when a home/unit was unoccupied as a result of the emergency;
- (3) identify the premises of affected customers whose utility service has been disrupted or degraded, and discontinue billing these premises without assessing a disconnection charge;
- (4) prorate any monthly access charge or minimum charges;
- (5) implement payment plan options for residential customers;
- (6) suspend disconnection for nonpayment and associated fees, waive deposit and late fee requirements for residential customers;
- (7) support low-income residential customers by: (a) freezing all standard and high-usage reviews for the California Alternate Rates for Energy (CARE) program eligibility for 12 months and potentially longer, as warranted; (b) contacting all community outreach contractors, the community based organizations who assist in enrolling hard-to-reach low-income customers into CARE, to help better inform customers of these eligibility changes; (c) partnering with the program administrator of the customer funded emergency assistance program for low-income customers and increase the assistance limit amount for the next 12 months; and (e) indicate how the energy savings assistance program can be deployed to assist customers;
- (8) suspend all CARE and FERA program removals to avoid unintentional loss of the discounted rate during the period for which the customer is protected under these customer protections;
- (9) discontinue generating all recertification and verification requests that require customers to provide their current income information;
- (10) offer repair processing and timing assistance and timely access to utility customers pursuant to Section 8386(c)(18);

---

<sup>14</sup> D.19-07-015 at 21-24.



- (11) include these customer protections as part of their larger community outreach and public awareness plans under Section 8386(c)(16)(b);
- (12) meet and confer with the Community Choice Aggregators as early as possible to discuss their roles and responsibilities for each emergency customer protection.

To the extent that they have not already done so in response to the Executive Director's March 17, 2020 letter, or to the extent to which their response was not fully responsive to the requirements of this Resolution, we direct electric and gas utilities subject to this Resolution to file Tier 2 compliance Advice Letters with the Commission's Energy Division to implement the ordering paragraphs of this resolution and modify their tariffs as necessary.

In order to allow for recovery of expenses reasonably incurred while complying with this Resolution, electric and gas utilities subject to this Resolution shall each establish a COVID-19 Pandemic Protections Memorandum Account (CPPMA), to book only those costs associated with protections ordered by this Resolution. The recorded costs must meet the following conditions: (1) those ordered by this Resolution; and (2) incurred starting with the date of the Governor's emergency declaration - March 4, 2020. The review of these costs for possible collection in rates will be conducted in a General Rate Case, a Biennial or Triennial (as applicable) Cost Allocation Proceeding, the Energy Resource Recovery Account, or another proceeding. This affords Commission staff an opportunity to review any incremental expense associated with this Resolution.

Finally, in order to provide immediate assistance and customer protections, electric and gas utilities subject to this Resolution must act with expediency in filing their Advice Letters, must request expedited Advice Letter treatment pursuant to the Commission's General Order (GO) 96-B, must request a waiver or a shortened protest and reply period of five days, and must include in their Advice Letters: (1) a communication plan to convey the availability of these protections to customers; and (2) preliminary statement tariff language for the new CPPMA.

### **Emergency Customer Protections for Water Customers**

The water and sewer corporations under this Commission's jurisdiction subject to this Resolution are the following: all Class-A water utilities (California Water Service Company, California American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities (Apple Valley Ranchos Water, and Park Water), San Jose Water Company, San Gabriel Valley Water Company, and Suburban Water Systems; and all Class-B water utilities (Bakman Water Company, Del Oro Water Company, East Pasadena Water Company, and Alco Water Service).

The water and sewer corporations subject to this Resolution shall take the following immediate actions. To the extent that they have not already done so in response to the Executive Director's March 17, 2020 letter, or to the extent to which their response was not fully responsive to the requirements of this Resolution, the water and sewer corporations subject to this Resolution shall file a Tier 2 Advice Letter no later than 15 days after this Resolution's approval demonstrating compliance to the Commission's Water Division:<sup>15</sup>

- (1) activation of their Catastrophic Event Memorandum Account (CEMA) effective to the date of the Governor's declaration of a state of emergency - March 4, 2020;
- (2) make insurance claims on all costs and expenses incurred as a result of the pandemic, and credit insurance payments to their CEMA;
- (3) work cooperatively with affected customers to resolve unpaid bills, and minimize disconnections for non-payment;
- (4) waive reconnection or facilities fees for customers and suspend deposits for customers who must reconnect to the system;
- (5) provide reasonable payment options to customers;
- (6) waive bills for victims who lost their homes or if their homes are rendered uninhabitable; and
- (7) authorize a pro rata waiver of any fixed element of a water bill for the time that the home is uninhabitable, even if the reason for it being uninhabitable is not loss of water service.

### **Emergency Customer Protections for Communications Customers**

The emergency customer protections established in D.19-08-025 ensure that residential and small business communications service customers who experience a housing or financial crisis due to a disaster keep vital services and receive support in the wake of the disaster.

The customer protections for facilities based and non-facilities-based landline providers (e.g., 9-1-1/E9-1-1 providers, LifeLine providers, VoIP providers, COLRs, and other landline providers) are:<sup>16</sup>

---

<sup>15</sup> *Id.* at 42-43.

<sup>16</sup> D.19-08-025 at 31-33.

- (1) Waiver of one-time activation fee for establishing remote call forwarding, remote access to call forwarding, call forwarding features and messaging services;
- (2) Waiver of the monthly rate for one month for remote call forwarding, remote access to call forwarding, call forwarding, call forwarding features, and messaging services;
- (3) Waiver of the service charge for installation of service at the temporary or new permanent location of the customer and again when the customer moves back to the premises;
- (4) Waiver of the fee for one jack and associated wiring at the temporary location regardless of whether the customer has an Inside Wire Plan;
- (5) Waiver of the fee for up to five free jacks and associated wiring for Inside Wiring Plan customer upon their return to their permanent location;
- (6) Waiver of the fee for one jack and associated wiring for non-Plan customers upon their return to their permanent location;

Decision 19-08-025 describes the customer protections for wireless providers (e.g., those that provide access to E9-1-1 and/or Lifeline services) as follows. Items 1-6 apply to facilities-based wireless providers, and items 4-8 apply to resellers and non-facilities-based wireless providers, (e.g. mobile virtual network operators [MVNOs]):<sup>17</sup>

- (1) Deploy mobile equipment, including Cells on Wheels and Cells on Light Trucks, to supplement service in areas that need additional capacity to ensure access to 9-1-1/E9-1-1 service;
- (2) Provide device charging stations in areas where impacted wireless customers seek refuge; and
- (3) Provide WiFi access in areas where impacted wireless customers seek refuge.

The following are directed to all facilities-based and non-facilities based wireless providers, including resellers:<sup>18</sup>

---

<sup>17</sup> *Id.* at 33.

<sup>18</sup> *Id.* at 34.

- (4) Provide mobile phones for customers seeking shelter from a disaster to use temporarily at a county or city designated shelter.
- (5) The Commission urges wireless carriers to allow customers to defer or phase payment for coverage charges for data, talk, and text for defined periods of time;
- (6) The Commission urges wireless carriers to extend payment dates for service for defined periods of time;
- (7) Consider providing temporary replacement phones for customers whose phones were lost or damaged as a result of a disaster or evacuation.
- (8) Consider providing temporary replacement phones for customers whose phones were lost or damaged as a result of a disaster or evacuation.

Decision 19-08-025 incorporates the interim emergency protections applicable to LifeLine service adopted in D.18-08-004,<sup>19</sup> which are in effect during the COVID-19 state of emergency for all providers of LifeLine service:<sup>20</sup>

- (1) Delay the California LifeLine Renewal Process and suspend the de-enrollment for non-usage rules; and
- (2) Implement the LifeLine outreach methods.

To the extent that they have not already done so in response to the Executive Director's March 17, 2020 letter, or to the extent to which their response was not fully responsive to the requirements of this Resolution, communications corporations subject to this Resolution shall file an Advice Letter no later than 15 days after this Resolution's approval demonstrating compliance to the Commission's Communications Division.

### **Community Awareness and Public Outreach of Customer Protection Implementation during COVID-19**

In D.19-07-015 and D.19-08-025, we directed the utilities and communications service providers to raise awareness about the existence of the emergency customer protections

---

<sup>19</sup> D.18-08-004 at 9.

<sup>20</sup> Nothing in this Resolution supersedes other customer protections which may be ordered by the Commission. For example, the March 19, 2020 Assigned Commissioner Ruling (ACR) in R.20-02-008 suspended the LifeLine renewal process, including de-enrollment due to the renewal process, for all California LifeLine participants including those who do not meet federal LifeLine eligibility criteria for a period of 90 days from the date of the ACR unless modified by a Commission decision. (R.20-02-008 ACR at 3.)

before, during, and after a disaster so customers are prepared. In these decisions, we established a baseline set of required outreach and education activities to ensure ratepayers have robust awareness about the Commission’s customer protections.<sup>21</sup> Then in D.20-03-004 we adopted further in-language community outreach awareness and public outreach requirements before, during and after a wildfire for our regulated, investor-owned electrical utilities.<sup>22</sup>

For meaningful public impact during this COVID-19 crisis, we direct the utilities and communications service providers to conduct outreach of these protections to customers. Outreach and public awareness should be consistent with D.19-07-015, D.19-08-025, and D.20-03-004 regarding the type of service the various utilities and communications service providers offer.<sup>23</sup> The utilities and communications service providers have flexibility in how they deliver messages about the customer protections ordered in D.19-07-015, D.19-08-025 and in the languages ordered in D.20-03-004 as long as the messages are designed to reach customers to the maximum extent and aid them in their understanding of these customer protections.

### **General Compliance with other State Statutes and Applicable Regulations**

The electric, gas, communications, and water and sewer corporations subject to this Resolution are directed to ensure compliance with existing statutes, regulations, ordinances and work in cooperation with all appropriate California, federal, and local government agencies.

### **COMMENTS**

Public Utilities Code section 311(g)(1) provides that this Resolution must be served on all parties and subject to at least 30 days public review and comment prior to a vote of the Commission. Section 311(g)(2) provides that this 30-day period may be reduced or waived “in an unforeseen emergency . . . .” The Commission’s Rules of Practice and Procedure also provide that public review and comment may be waived or reduced in an “unforeseen emergency situation” specifically where there are “[a]ctivities that severely impair or threaten to severely impair public health or safety...” (Rule 14.6(a)(1) and/or where there are “[c]rippling disasters that severely impair public health or safety.” (Rule 14.6(a)(2)). “Requests for relief based on extraordinary conditions in which time is of the

---

<sup>21</sup> D.19-07-015 at 35-37; *see also* D.19-08-025 at 39-42.

<sup>22</sup> D.20-03-004 at 19-25.

<sup>23</sup> The requirements in D.19-08-025 apply to the communications service providers. The requirements in D.19-07-015 and D.20-03-004 apply to the electrical corporations. The requirements of D.19-07-015 apply to the natural gas and Class A and Class B water corporations.

essence.” (Rule 14.6(a)(2)). “Unusual matters that cannot be disposed of by normal procedures if the duties of the Commission are to be fulfilled.”

The 30-day comment period is waived pursuant to these authorities due to the extraordinary nature of the pandemic. In order to better disseminate the directives in this resolution it was served on the service list of the proceeding that developed the customer protection measures discussed herein - R.18-03-011. Interested persons can participate in the forthcoming Advice Letter processes.

## **FINDINGS**

1. On March 4, 2020, Governor Newsom declared a State of Emergency in California related to COVID-19.
2. On March 19, 2020, Governor Newsom ordered Californians to shelter in place except to meet essential needs.
3. Social distancing and shelter-in-place requirements have required the closure of non-essential businesses and resulted in layoffs.
4. Employee layoffs due to the COVID-19 pandemic have created a risk that residential customers may fall behind on utility payments through no fault of their own.
5. Some companies have already implemented customer protections in response to the COVID-19 pandemic, including observing moratoria on disconnections for nonpayment and lifting broadband data caps.
6. In order to assist Californians affected by the COVID-19 pandemic, it is reasonable to provide continuity and consistency between all utility actions related to the pandemic.
7. The Commission has previously issued Resolutions and opened Rulemakings to address highly disruptive events, most recently in response the devastating wildfires in Northern and Southern California.
8. In response to the reoccurring natural and manmade disasters, the Commission opened Rulemaking (R.) 18-03-011 and adopted customer protection measures adopted in decisions (D.)19-07-015 and D.19-08-025.
9. Having access to essential utility services is critical to maintaining Californians’ health and safety during the COVID-19 pandemic.

10. In order to expeditiously assist Californians affected by the COVID-19 pandemic, it is reasonable to apply the emergency customer protections adopted in D.19-07-015 and D.19-08-025 during the pendency of the pandemic.
11. Public Utilities Code section 311(g)(2) allows the Commission to reduce or waive the public review and comment period in an unforeseen emergency.

**THEREFORE, IT IS ORDERED that:**

1. Electric, gas, communications, and water and sewer corporations subject to this Resolution shall retroactively apply the customer protection measures adopted in D.19-07-015 and D.19-08-025 from March 4, 2020 onward.
2. To the extent that they have not already done so in response to the Executive Director's March 17, 2020 letter, or to the extent to which their response was not fully responsive to the requirements of this Resolution, electric, gas, communications, and water and sewer corporations subject to this Resolution shall file a Tier 2 Advice Letter describing all reasonable and necessary actions to implement the emergency customer protections adopted in D.19-07-015 and D.19-08-025 to support California customers.
3. Commission staff will review the Advice Letters for compliance with the customer protection measures adopted in D.19-07-015 and D.19-08-025.
4. In the Tier 2 Advice Letter required in Ordering Paragraph #2, rate regulated electric, gas, communications, and water and sewer corporations subject to this Resolution may request authorization to track and recover incremental costs associated with complying with this resolution.
5. The Emergency Customer Protections apply to residential and small business customers for up to one year from the date of this Resolution, with the option to extend.
6. The electric, gas, communications, and water and sewer corporations subject to this resolution shall conduct community awareness and public outreach of the customer protection measures adopted in D.19-07-015 and D.19-08-025 consistent with the requirements of D.19-07-015, D.19-08-025, and D.20-03-004.<sup>24</sup>
7. This order is effective today.

---

<sup>24</sup> The requirements in D.19-08-025 apply to the communications service providers. The requirements in D.19-07-015 and D.20-03-004 apply to the electrical corporations. The requirements of D.19-07-015 apply to the natural gas and Class A and Class B water corporations.

I certify that the foregoing resolution was adopted by the California Public Utilities Commission at its regular meeting of April 16, 2020, and the following Commissioners approved favorably thereon:

/s/ ALICE STEBBINS

---

Alice Stebbins  
Executive Director

MARYBEL BATJER  
President

LIANE M. RANDOLPH  
MARTHA GUZMAN ACEVES  
CLIFFORD RECHTSCHAFFEN  
GENEVIEVE SHIROMA  
Commissioners



# **ATTACHMENT B**

**Resolution M-4849**

Date of Issuance  
February 12, 2021

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Executive Division

Date: February 11, 2021  
Resolution M-4849

**R E S O L U T I O N**

**AUTHORIZATION AND ORDER DIRECTING UTILITIES TO  
EXTEND EMERGENCY CUSTOMER PROTECTIONS TO  
SUPPORT CALIFORNIA CUSTOMERS THROUGH JUNE 30, 2021,  
AND TO FILE TRANSITION PLANS FOR THE EXPIRATION OF  
THE EMERGENCY CUSTOMER PROTECTIONS**

**SUMMARY**

The Commission issues this Resolution on its own motion in response to Governor Gavin Newsom's declaration of a state of emergency and issuance of executive orders due to the novel coronavirus (COVID-19) pandemic. On April 17, 2020, the Commission issued Resolution M-4842, which ratified directions provided by the Commission's Executive Director on March 17, 2020<sup>1</sup> to energy, water, and communications corporations to retroactively apply customer protection measures from March 4, 2020 onward during the pendency of the COVID-19 pandemic, for up to one year with an option to extend.<sup>2</sup>

This Resolution extends the Emergency Customer Protections for residential and small business customers through June 30, 2021, and the Commission reserves an option to extend further. Additionally, electric, gas, communications, and water corporations shall file a Tier 1 Advice Letter describing all reasonable and necessary actions to extend the Emergency Customer Protections contained in this Resolution to support California customers through June 30, 2021, and the electric, gas, and water corporations shall extend the memorandum accounts established pursuant to Resolution M-4842 to track incremental costs associated with complying with this Resolution.

In addition, electric, gas, and water corporations in California shall file a Tier 2 Advice Letter containing their transition plans associated with discontinuance of the Emergency Customer Protections after June 30, 2021. The goal of the transition plan is to effectively

---

<sup>1</sup> March 17, 2020 [Executive Director Letter to Energy Companies Regarding COVID-19](https://www.cpuc.ca.gov/covid/); [Executive Director Letter to Water Companies Regarding COVID-19](https://www.cpuc.ca.gov/covid/); [Executive Director Letter to Communications Companies Regarding COVID-19](https://www.cpuc.ca.gov/covid/) all available at <https://www.cpuc.ca.gov/covid/>

<sup>2</sup>[https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News\\_Room/NewsUpdates/2020/Final%20Resolution%20M-4842.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2020/Final%20Resolution%20M-4842.pdf)

ease customers through a transition off of the Emergency Customer Protections by proactively communicating with customers to enroll them in programs to manage their utility bills and informing them of the changes to programs in which they are already enrolled. As described more fully below, these transition plans shall include 1) a timeline of new and resumed activities, 2) a marketing, education, and outreach (ME&O) strategy, 3) an explanation of how the activities timeline and ME&O strategy account for compliance and safety, and 4) a progress tracking and reporting plan.

## **BACKGROUND**

On March 4, 2020, when Governor Newsom declared a State of Emergency related to COVID-19, there were 53 known cases of COVID-19 in California.<sup>3</sup> As of January 11, 2021, there were 2,747,288 cases of COVID-19 in California, and 30,513 deaths.<sup>4</sup>

On March 19, 2020, Governor Newsom ordered Californians to shelter in place except to meet essential needs.<sup>5</sup> On August 22, 2020, the State released the Blueprint for a Safer Economy<sup>6</sup> to permit gradual reopening of certain businesses and activities, but due to increases in California's COVID-19 caseload, hospitalizations, and test positivity rate, many businesses remain closed, and Californians are being asked to stay home between 10:00 p.m. and 5:00 a.m.<sup>7</sup> It is uncontroverted that as of January 12, 2021, 54 counties, representing 99.6 percent of California's population, were in the most restrictive tier of California's reopening roadmap.<sup>8</sup>

In April and May 2020, California's unemployment rate hit 16.4 percent due to COVID-19 pandemic-related job loss. Although the unemployment rate fell to 8.2 percent in November 2020, California's unemployment rate in March 2020 was only 5.5 percent, and California has only recovered 46 percent of the nonfarm jobs lost due to the COVID-19 pandemic during March and April 2020.<sup>9</sup> With 99.6 percent of California's

---

<sup>3</sup> <https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-help-state-prepare-for-broader-spread-of-covid-19/>

<sup>4</sup> <https://covid19.ca.gov/>

<sup>5</sup> Executive Order N-33-20, available at <https://www.gov.ca.gov/2020/03/19/governor-gavin-newsom-issues-stay-at-home-order/> On April 2, 2020, the Governor also issued Executive Order N-42-20 to prohibit water utilities from disconnecting water service:

<https://www.gov.ca.gov/2020/04/02/governor-newsom-issues-executive-order-protecting-homes-small-businesses-from-water-shutoffs/>

<sup>6</sup> <https://covid19.ca.gov/safer-economy/>

<sup>7</sup> <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/limited-stay-at-home-order-qa.aspx>

<sup>8</sup> <https://covid19.ca.gov/safer-economy/>

<sup>9</sup> <https://edd.ca.gov/newsroom/unemployment-december-2020.htm>

population in the most restrictive reopening tier, California's economy is still months away from recovery.

While a new federal pandemic relief package was signed into law on December 27, 2020, the stimulus checks and federal unemployment benefit enhancement are half the amount provided in the prior CARES Act, and unemployment recipients may only receive 10 weeks of the federal benefit enhancement instead of 11.<sup>10</sup> The scope and level of further federal and state support is uncertain.

Multiple COVID-19 vaccines have been approved or are in the approval pipeline, and the California Department of Public Health estimates that California will have enough supplies to vaccinate most Californians in all 58 counties by summer 2021.<sup>11</sup> Dr. Anthony Fauci, Director of the National Institute of Allergy and Infectious Diseases, predicts that widespread vaccinations could help the United States reach early herd immunity by late spring or summer 2021.<sup>12</sup>

The Commission takes specific action in this Resolution in response to the Governor's emergency proclamation and executive orders and to orders from the California Department of Public Health, and in response to the ongoing economic hardship caused by the COVID-19 pandemic, to ensure continued continuity and consistency between all utility actions resulting from the ongoing COVID-19 pandemic.

## **DISCUSSION**

COVID-19 has been extremely disruptive to all Californians and has had severe economic impacts on many Californians. In response to reoccurring natural and manmade disasters prior to COVID-19, the Commission initiated a disaster relief Rulemaking, (R.) R.18-03-011, and adopted a series of requirements for utility companies (electric, gas, water) and communications providers, culminating in customer protection measures adopted in two Decisions, (D.) D.19-07-015 and D.19-08-025.

The customer protection measures adopted in R.18-03-011 apply where a gubernatorial or presidential declared emergency relates to the disruption or degradation of service. The COVID-19 pandemic represents a different type of emergency, one where the threat – in this case, a virus – necessitates a response which impacts Californians' ability to access or pay for utility service. Social distancing and shelter-in-place requirements have required the closure of non-essential businesses including bars, dine-in restaurants, and

---

<sup>10</sup> <https://www.cnn.com/2020/12/20/politics/second-covid-stimulus-package-details/index.html>

<sup>11</sup> <https://covid19.ca.gov/vaccines/>

<sup>12</sup> <https://www.npr.org/sections/coronavirus-live-updates/2020/12/15/946714505/fauci-predicts-u-s-could-see-signs-of-herd-immunity-by-late-march-or-early-april>

shops, and subsequent employee layoffs have impacted the ability of customers to stay current on utility payments at the same time that shelter in place orders have caused increased usage of utility services and resulted in higher utility bills.

Having access to essential utility services is critical to maintaining Californians' health and safety during the COVID-19 pandemic. Therefore, due to the continued economic harm from the COVID-19 pandemic, the Commission extends to California customers the Emergency Customer Protections from D.19-07-015 and D.19-08-025, as ordered by Resolution M-4842, through June 30, 2021, and the Commission reserves an option to extend. The Commission takes this action in response to extraordinary circumstances and the ongoing state of emergency to ensure continuity of essential services to customers during this health and safety crisis. This Resolution does not establish precedent for standard Commission ratemaking or customer protection processes.

All residential and small business customers in California are eligible for the Emergency Customer Protections set forth below in this Resolution by industry. As we stated in Resolution M-4842, these customer protections are a floor, not a ceiling; utilities may provide additional consumer services or protections.

We direct the electric and gas corporations subject to this Resolution to continue to use the COVID-19 Pandemic Protections Memorandum Accounts (CPPMA) established in Resolution M-4842 to record costs associated with extending the required customer protections in this Resolution and developing the Transition Plan. The purpose of the CPPMA account becomes to record and track incremental costs associated with COVID-19 pandemic as described in Resolution M-4842 and this Resolution collectively. The review of these costs for possible collection in rates will be conducted in a General Rate Case, a Biennial or Triennial (as applicable) Cost Allocation Proceeding, the Energy Resource Recovery Account, or another proceeding. This affords Commission staff an opportunity to review any incremental expense associated with this Resolution.

The electric, gas, communications, and water corporations subject to this Resolution, as specified in the following sections, are directed to ensure compliance with existing statutes, regulations, and ordinances and work in cooperation with all appropriate California, federal, and local government agencies.

## **I. EXTENDING EMERGENCY CUSTOMER PROTECTIONS FOR RESIDENTIAL AND SMALL BUSINESS CUSTOMERS THROUGH JUNE 30, 2021**

### **Emergency Customer Protections for Electric and Gas Utility Customers**

The electric and gas utilities under this Commission's jurisdiction subject to this Resolution are the following: (1) Pacific Gas and Electric Company; (2) Southern

California Edison Company; (3) San Diego Gas & Electric Company; (4) Southern California Gas Company; (5) PacifiCorp; (6) Liberty Utilities (CalPECO Electric) LLC; (7) Bear Valley Electric Service (a division of Golden State Water Company); (8) Southwest Gas Corporation; (9) Alpine Natural Gas, Inc.; (10) West Coast Gas Company, Inc.; and (11) Catalina Island Gas Services.

The electric and gas utilities subject to this Resolution shall each file a Tier 1 Advice Letter with the Commission's Energy Division no later than 10 days after the issuance of this Resolution demonstrating compliance with the extension of Emergency Customer Protections to June 30, 2021. Electric and gas corporations shall serve copies of the Advice Letters to R.18-03-011, A. 14-11-007, A.15-02-001, A.19-11-003, A.20-03-014, R.15-03-010, R.18-07-006, R.18-07-005, R.12-06-013, and A.19-09-014 proceeding service lists. Should any of the actions utilities are taking to implement Emergency Customer Protections need to be revised from the prior Resolution M-4842 Advice Letter compliance filings, or if certain customer protections were inapplicable during the pandemic and not already noted and accepted as such in prior filing, these revisions should be noted in the Tier 1 Advice Letter to this Resolution. The Emergency Customer Protections identified in Resolution M-4842 are as follows:<sup>13</sup>

- (1) waive deposit requirements for residential customers seeking to reestablish service for one year and expedite move in and move out service requests;
- (2) stop estimated usage for billing attributed to the time period when a home/unit was unoccupied as a result of the emergency;
- (3) identify the premises of affected customers whose utility service has been disrupted or degraded, and discontinue billing these premises without assessing a disconnection charge;
- (4) prorate any monthly access charge or minimum charges;
- (5) implement payment plan options for residential customers;
- (6) suspend disconnection for nonpayment and associated fees, waive deposit and late fee requirements for residential customers;
- (7) support low-income residential customers by: (a) freezing all standard and high usage reviews for the California Alternate Rates for Energy (CARE) program eligibility for 12 months and potentially longer, as warranted; (b) contacting all community outreach contractors, the community based organizations who assist in enrolling hard to reach low income customers into

---

<sup>13</sup> Decision 20-06-003, adopted on June 11, 2020, subsequently eliminated certain deposits and fees for residential customers.

- CARE, to help better inform customers of these eligibility changes; (c) partnering with the program administrator of the customer funded emergency assistance program for low income customers and increase the assistance limit amount for the next 12 months; and (e) indicate how the energy savings assistance program can be deployed to assist customers;
- (8) suspend all CARE and FERA program removals to avoid unintentional loss of the discounted rate during the period for which the customer is protected under these customer protections;
  - (9) discontinue generating all recertification and verification requests that require customers to provide their current income information;
  - (10) offer repair processing and timing assistance and timely access to utility customers pursuant to Section 8386(c)(18);
  - (11) include these customer protections as part of their larger community outreach and public awareness plans under Section 8386(c)(16)(b);
  - (12) meet and confer with the Community Choice Aggregators as early as possible to discuss their roles and responsibilities for each emergency customer protection.

### **Emergency Customer Protections for Water Customers**

The water corporations under this Commission's jurisdiction subject to this Resolution are the following: all Class-A water utilities (California Water Service Company, California American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities (Apple Valley Ranchos Water, and Park Water), San Jose Water Company, San Gabriel Valley Water Company, and Suburban Water Systems; and all Class-B water utilities (Bakman Water Company, Del Oro Water Company, East Pasadena Water Company, and Alco Water Service).

The water corporations subject to this Resolution shall file a Tier 1 Advice Letter with the Commission's Water Division no later than 10 days after the issuance of this Resolution demonstrating compliance with the extension of Emergency Customer Protections to June 30, 2021. Water corporations shall serve copies of the Advice Letters to R.18-03-011 and R.17-06-024 proceeding service lists. Should any of the actions utilities are taking to extend the Emergency Customer Protections need to be revised from the Resolution M-4842 Advice Letter compliance filings, or if certain customer protections were inapplicable during the pandemic and not already noted and accepted as

such in prior filings, these revisions should be noted in the Tier 1 Advice Letter to this Resolution. The Emergency Customer Protections identified in Resolution M-4842 are as follows:

- (1) activation of their Catastrophic Event Memorandum Account (CEMA) effective to the date of the Governor's declaration of a state of emergency - March 4, 2020;
- (2) make insurance claims on all costs and expenses incurred as a result of the pandemic, and credit insurance payments to their CEMA;
- (3) work cooperatively with affected customers to resolve unpaid bills, and minimize disconnections for non-payment;
- (4) waive reconnection or facilities fees for customers and suspend deposits for customers who must reconnect to the system;
- (5) provide reasonable payment options to customers;
- (6) waive bills for victims who lost their homes or if their homes are rendered uninhabitable; and
- (7) authorize a pro rata waiver of any fixed element of a water bill for the time that the home is uninhabitable, even if the reason for it being uninhabitable is not loss of water service.

### **Emergency Customer Protections for Communications Customers**

The Emergency Customer Protections established in D.19-08-025 ensure that residential and small business communications service customers who experience a housing or financial crisis due to a disaster keep vital services and receive support in the wake of the disaster.

The customer protections for facilities based and non-facilities-based landline providers (e.g., 9-1-1/E9-1-1 providers, LifeLine providers, Voice over Internet Protocol (VoIP) providers, Carriers of Last Resort (COLRs), and other landline providers) are:<sup>14</sup>

- (1) Waiver of one-time activation fee for establishing remote call forwarding, remote access to call forwarding, call forwarding features and messaging services;

---

<sup>14</sup> D.19-08-025 at 31-33.



- (2) Waiver of the monthly rate for one month for remote call forwarding, remote access to call forwarding, call forwarding, call forwarding features, and messaging services;
- (3) Waiver of the service charge for installation of service at the temporary or new permanent location of the customer and again when the customer moves back to the premises;
- (4) Waiver of the fee for one jack and associated wiring at the temporary location regardless of whether the customer has an Inside Wire Plan;
- (5) Waiver of the fee for up to five free jacks and associated wiring for Inside Wiring Plan customer upon their return to their permanent location;
- (6) Waiver of the fee for one jack and associated wiring for non-Plan customers upon their return to their permanent location;

Decision 19-08-025 describes the customer protections for wireless providers (e.g., those that provide access to E9-1-1 and/or Lifeline services) as follows. Items 1-6 below apply to facilities-based wireless providers, and items 4-7 apply to resellers and non-facilities-based wireless providers, (e.g. mobile virtual network operators [MVNOs]):<sup>15</sup>

- (1) Deploy mobile equipment, including Cells on Wheels and Cells on Light Trucks, to supplement service in areas that need additional capacity to ensure access to 9-1-1/E9-1-1 service;
- (2) Provide device charging stations in areas where impacted wireless customers seek refuge; and
- (3) Provide WiFi access in areas where impacted wireless customers seek refuge.

The following are directed to all facilities-based and non-facilities based wireless providers, including resellers:<sup>16</sup>

- (4) Provide mobile phones for customers seeking shelter from a disaster to use temporarily at a county or city designated shelter.

---

<sup>15</sup> *Id.* at 33.

<sup>16</sup> *Id.* at 34.

- (5) The Commission urges wireless carriers to allow customers to defer or phase payment for coverage charges for data, talk, and text for defined periods of time;
- (6) The Commission urges wireless carriers to extend payment dates for service for defined periods of time;
- (7) Consider providing temporary replacement phones for customers whose phones were lost or damaged as a result of a disaster or evacuation.

Decision 19-08-025 incorporates the interim emergency protections applicable to LifeLine service adopted in D.18-08-004,<sup>17</sup> which are in effect during the COVID-19 state of emergency for all providers of LifeLine service:<sup>18</sup>

- (1) Delay the California LifeLine Renewal Process and suspend the de-enrollment for non-usage rules; and
- (2) Implement the LifeLine outreach methods.

In Resolution M-4842, we directed the utilities and communications service providers to conduct outreach of these protections to customers, and with this Resolution we direct that this outreach shall continue through June 30, 2021.

Communications corporations subject to this resolution shall each file a Tier 1 Advice Letter no later than 10 days after this Resolution's approval demonstrating compliance with the extension of Emergency Customer Protections to June 30, 2021.

Communications corporations shall serve copies of the Advice Letters to the R.18-03-011 proceeding service list. Should any of the actions taken to implement Emergency Customer Protections need be revised from already disposed Resolution M-4842 Advice Letter compliance filings, or if certain customer protections were inapplicable during the pandemic and not already noted and accepted as such in prior filing, these revisions should be noted in the Tier 1 Advice Letter to this Resolution.

---

<sup>17</sup> D.18-08-004 at 9.

<sup>18</sup> Nothing in this Resolution supersedes other customer protections which may be ordered by the Commission. For example, the March 19, 2020 Assigned Commissioner Ruling (ACR) in R.20-02-008 suspended the LifeLine renewal process, including de-enrollment due to the renewal process, for all California LifeLine participants including those who do not meet federal LifeLine eligibility criteria for a period of 90 days from the date of the ACR unless modified by a Commission decision. (R.20-02-008 ACR at 3.) These protections were also extended through February 28, 2021 through a similar ACR issued November 24, 2020.

## II. TRANSITION PLAN FOR THE EXPIRATION OF EMERGENCY CUSTOMER PROTECTIONS

On October 30, 2020, the CPUC and the State Water Resources Control Board jointly hosted a workshop on Water Affordability During COVID-19. On November 12, 2020, the CPUC hosted a Workshop on the Impacts of COVID-19 on Energy Customers and Customer Programs.<sup>19</sup> The data presented at these workshops showed significant growth in the number of customers with arrearages, and in arrearage amounts, in the period of March 2020 to present. There is a need for facilitating customers' enrollment in programs to manage their arrearages.

After the customer protection period expires, the electric, gas, and water corporations subject to this Resolution (collectively, IOUs) will return to implementing programs and utility service as per the non-emergency state Commission decision directives.

To facilitate a smooth transition for customers when the Emergency Customer Protections are lifted, each electric, gas, and water corporation subject to this Resolution shall file a Tier 2 Advice Letter with its transition plan, or "Transition Plan Advice Letter," by April 1, 2021. These IOUs shall design the transition plan to effectively ease customers through a transition off of the Emergency Customer Protections by proactively communicating with customers to enroll them in programs to manage their utility bills and informing them of the changes to programs in which they are already enrolled. The Emergency Customer Protections extended to communications customers in Resolution M-4842 did not include a moratorium on disconnections for nonpayment, however the Commission imposed a 90 day moratorium on disconnections for non-payment for communications customers in Resolution M-4848,<sup>20</sup> therefore we determine that outreach to customers concerning the expiration of the Emergency Customer Protections is sufficient and that communications corporations are not required to file transition plans.

The transition plan shall include 1) a timeline of new activities and resumed activities, 2) a marketing, education, and outreach (ME&O) strategy, 3) an explanation of how the activities timeline and ME&O strategy account for compliance and safety, and 4) a progress tracking and reporting plan. IOUs should take into account the challenges and solutions discussed in the October 30 and November 12, 2020 COVID workshops as they prepare their transition plans.

---

<sup>19</sup> Materials available at: <https://www.cpuc.ca.gov/covidworkshop/>

<sup>20</sup> Resolution 4848 Issued December 18, 2020  
<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M355/K761/355761752.PDF>

## **Content of Transition Plans for Energy and Water Utilities**

### 1. Activities Timeline

The IOUs' transition plans shall map out a timeline of activities associated with programs or initiatives that assist customers in bill management. Relevant programs include, but are not limited to, 1) bill assistance programs: California Alternate Rates for Energy (CARE), Family Electric Rate Assistance (FERA), Customer Assistance Program (CAP), medical baseline; 2) bill payment options: energy Arrearage Management Plan, 12-month payment plan; and 3) customer programs and rates: Time of Use residential rate structure for energy IOUs, Energy Savings Assistance Program. Activities can be categorized as those associated with programs/initiatives that were approved and/or started since the pandemic shelter in place order in March 2020, and activities which were suspended for an already existing program as a result of Emergency Customer Protections and will resume.

The discussion of new activities should focus on programs/initiatives that IOUs can leverage to support their transition plan or should be coordinated among other activities for a smooth transition. New activities shall include, but are not limited to, those associated with the following new programs:

- Applicable Payment Plan options (energy Arrearage Management Plan, 12-month payment plan)
- Time of Use residential rate structure for energy IOUs

Resumed activities shall include, but are not limited to:

- Noticing of risk of disconnection
- Verification of customer eligibility in California Alternate Rates for Energy (CARE), Family Electric Rate Assistance (FERA), Customer Assistance Program (CAP), etc.
- Requirement for customer recertifications of eligibility for programs
- Application of late-payment, reconnection, and other fees to a customer<sup>21</sup>

---

<sup>21</sup> Do not include any fees eliminated with the intent that they not be resumed after Emergency Customer Protections lift, such as residential reconnection fees per D.20-06-003.

Activities that should be noted on the timeline include communications to customers related to a pending change to the customer's service or status of enrollment in a program, a required action by customers to maintain existing services or program status, and all other communications about transitions or events that could trigger a group of customers' alarm or unease. Activities can also include relevant Commission Decision-mandated activities.

IOUs shall demonstrate through the sequencing and timing of activities, and defining which groups of customers will be impacted by each activity, that the timeline has been thought through from a customer-impact lens, and is part of a coordinated and thus more effective marketing, education, and outreach strategy.

## 2. Marketing, Education, and Outreach Strategy

The IOUs shall include a coordinated, effective, and efficient strategy for their marketing, education, and outreach plan to engage and enroll customers in new bill management programs, to inform customers already enrolled in programs about changes due to the Emergency Customer Protections being no longer in effect after June 30, 2021, and to inform customers of the extension of the customer protections, where necessary.

The marketing, education, and outreach strategy must include, but is not limited to:

- targeted outreach to customers with arrears, and for water utilities to customers that may qualify for disconnection preventions due to medical needs
- general marketing and outreach to customers on assistance programs
- coordination with the California Department of Community Services and Development and their local service providers to:
  - facilitate customers' access to federal assistance Low Income Home Energy Assistance Program, and
  - leverage their customer interactions for expanding outreach efforts on IOUs' bill management programs
- the timing and incremental budget, if necessary, for ME&O efforts

IOUs must detail how the ME&O strategy supports and is aligned with the Activities Timeline. IOUs shall identify which, if any, activities in the timeline will receive a disproportionately large ME&O effort and provide reasoning for this activity receiving enhanced ME&O. IOUs shall indicate which ME&O efforts were already ongoing that

they are leveraging to support the transition plan versus which ME&O activities are new proposals.

IOUs should consider the following as they develop their ME&O strategy:

- Increasing the frequency with which energy and water IOUs exchange data on accounts enrolled in income-eligible programs so that eligible customers can be targeted for enrollment<sup>22</sup>
- How best to combine messaging to customers on multiple aspects of the transition plan (e.g., forthcoming changes resulting from expiration of Emergency Customer Protections, and bill management options), so customers receive fewer and coordinated communications, rather than multiple messages
- A plan for identifying and coordinating with other agencies and/or entities that can directly contact customers
- Training for IOU call center staff on IOU programs and associated activities
- The appropriate method of customer communication, including non-English languages and forms for communication to reach people with disabilities and other access and functional needs

Wherever possible, IOUs must strive for statewide consistency within each industry (consistent between energy utilities, and consistent between water utilities) in marketing materials and strategy. Consistency serves to 1) ease confusion and/or increase efficiencies for customer facing entities supporting IOUs in executing the ME&O strategy, 2) reduce challenges for call centers receiving customer reports from customers across multiple utilities, and 3) ease processing and interactions between regulators and utilities as utilities report on their implementation of the plan.

Individual IOUs shall look to those IOUs actively planning or implementing marketing, education, and outreach efforts, and leverage any effective practices, i.e., activities that have been highlighted by stakeholders as an example to follow in meetings, workshops, and/or through party responses to IOU Advice Letters and/or applications. IOUs shall propose in their prepared presentations to LIOB what marketing materials and strategy

---

<sup>22</sup> At the May 22, 2020 CARE All-Party meeting Commissioners asked Energy IOUs about increasing data sharing frequency from bi-annually (Question 3.b. from detailed agenda of All-Party Meeting on California Alternate Rates for Energy (CARE) education and outreach in light of COVID-19 noticed to service lists.) In response, an additional data exchange occurred in July, and utilities have discussed increasing frequency – September LIOB full committee meeting Water Division update, slide 3: [https://liob.cpuc.ca.gov/wp-content/uploads/sites/14/2020/12/Item-005b\\_CPUC-Water-Update-LIOB-200917.pdf](https://liob.cpuc.ca.gov/wp-content/uploads/sites/14/2020/12/Item-005b_CPUC-Water-Update-LIOB-200917.pdf)

they can make consistent statewide (i.e., across all IOUs). See also section below on “Authorities Delegated to Divisions.”

### 3. Compliance and safety

Each IOU must explain in their Transition Plan Advice Letter how the transition plan maintains alignment with program enrollment targets, program eligibility requirements, and customer protections in effect outside Emergency Customer Protections (e.g., bans on requirements that energy customers pay a deposit to enroll in 12-month payment plan) established by Commission Decisions for relevant programs as outlined in Section 1, Activities Timeline.

In particular, for large energy IOUs the transition plan shall include the number and percent of customers by zip code who are projected to be facing disconnection after June 30, 2021, and compare it to the monthly disconnection cap.

For Class A water IOUs, the transition plan shall include the number and percent of customers who are projected to be facing disconnection after June 30, 2021, and a schedule that complies with SB 998 requirements of providing a 79-day period after the payment is past due before a customer may be disconnected.

IOUs must also discuss how the plan ensures activities are safe and consistent with all appropriate state and local health orders.

### 4. Progress tracking and reporting

IOUs must include a plan for reporting progress on activities in the timeline, and present metrics they will track and report to monitor success in achieving the goal of effectively easing customers through a transition off of Emergency Customer Protections by proactively enrolling customers in programs to manage their utility bills and informing relevant customers of the changes to programs in which they are already enrolled. Reporting frequency shall be monthly and the first report shall include baseline data associated with progress metrics. A progress metric shall be included for both of the following areas for tracking and reporting:

- i) Customers that enrolled in a bill assistance program (as described in Section 1, Activities Timeline) when Emergency Customer Protections were in place are successful in sustaining their enrollment in the program if they still meet eligibility criteria

## Examples:

- Number and percent of newly enrolled customers that are able to stay on the income qualified bill assistance programs post June 30, 2021
- Number and percent of customers required to take actions to remain on income qualified bill assistance programs (e.g., recertification, post enrollment verification) that successfully complete those actions

## ii) Enrollments of impacted customers in new payment programs

## Examples:

- Number of customers enrolled in arrearage management plan (AMP) and number enrolled as a percentage of total customers eligible for AMP
- Number and percentage of customers that are disconnected<sup>23</sup>
  - Affirmation that no zip codes within the IOU's territory exceed the 30% cap on disconnections
- Change in arrearage amounts
- Number of customers identified as eligible and interested in enrolling in payment programs and percent of these successfully enrolled
- Number of IOU customer call center complaints concerning payment plans

Energy IOUs shall report these progress metrics monthly by including them in the monthly report required by the Disconnections Proceeding, R.18-07-005.<sup>24</sup> Water IOUs shall provide ongoing monthly reports to Water Division.

---

<sup>23</sup> Annual disconnections percentage should be reported using the Rolling Methodology for the Disconnection Cap specified in Appendix 1 to D.20-06-003 available here: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M340/K648/340648092.PDF>.

<sup>24</sup> Ordering Paragraph 6 of the Decision (D.) adopting interim disconnection rules for energy utilities, D.18-12-013, directed IOUs to file monthly reports on disconnections and arrearages.



**Costs and Accounting**

In some Decisions, IOUs are explicitly directed to conduct or propose ME&O efforts (e.g., medical baseline enrollment portion of Disconnections Proceeding, Wildfire Mitigation Plan, and Time of Use rates). In other Decisions that do not spell out specific ME&O requirements or budgets, IOUs are still expected to craft and execute necessary ME&Os to meet the Decision's mandates (e.g., the new AMP and 12-month payment plan elements set out in D.20-06-003). Therefore, all resumed and new start activities are already funded through Commission Decisions from their respective proceedings.

The ME&O strategy required here coordinates existing ME&O efforts to meet the goals of the transition plans. In other words, IOUs should use existing ME&O budgets, to the greatest extent practicable. If an IOU estimates that it cannot both comply with this Resolution and maintain compliance with existing Decision mandates leveraging only existing authorized budgets, it shall note in its Advice Letter the cost estimate, with details of the incremental new activity, and use the memorandum account to record and track incremental costs associated with transition plan implementation.

**Process Requirements for Transition Plan Advice Letter Development and Submission**

By February 25, 2021, IOUs shall submit drafts of Transition Plan Advice Letters to CPUC staff ([Gillian.Weaver@cpuc.ca.gov](mailto:Gillian.Weaver@cpuc.ca.gov)), who will share them with the LIOB and post them publicly on the LIOB website (liob.org). At the first quarterly LIOB meeting of 2021 (tentatively scheduled for March 11, 2021), electric, gas, and water utility staff shall prepare to present the draft transition plans during the LIOB meeting. The LIOB chair will coordinate the IOUs' presentations. Board members will provide feedback and recommendations to the IOUs. The IOUs shall consider and incorporate LIOB board member input where feasible, and any Commission staff feedback, and submit final Advice Letters on April 1, 2021. Electric and gas corporations shall serve copies of Advice Letters to R.18-03-011, A. 14-11-007, A.15-02-001, A.19-11-003, A.20-03-014, R.15-03-010, R.18-07-006, R.18-07-005, R.12-06-013, and A.19-09-014 proceeding service lists. Water corporations shall serve copies of Advice Letters to R.18-03-011 and R.17-06-024 proceeding service lists.

**Criteria for CPUC Industry Division Review and Approval of Transition Plans**

The criteria by which Energy Division staff will review and approve Electric and Gas IOU Transition Plan Advice Letters are:

- The Advice Letter addresses all elements required by this Resolution;

- The plan incorporates LIOB member feedback, where feasible, and Commission staff feedback;
- The metrics in the plan for tracking and reporting progress toward the transition plan goals are specific, measurable, and meaningful; and the methodology, including dates of measurement periods, for calculation of any baseline value and each monthly (at minimum) progress tracking value for metrics is clear;
- It appears likely that the timing of activities and the ME&O strategy in the transition plan will result in a positive impact from customer perspective compared to IOUs operating in absence of the transition plan;
- The ME&O efforts are coordinated with and not duplicative of existing marketing, outreach and education efforts, efficient and effective use of existing marketing education and outreach efforts and associated funds is demonstrated, and the customer lens is clearly articulated; and
- The IOU's implementation of its proposed transition plan will not preclude its compliance with existing statutes, regulations, ordinances.

The criteria by which Water Division staff will review and approve Water IOU Transition Plan Advice Letters are:

- The Advice Letter addresses all elements required by this Resolution;
- The Plan incorporates LIOB member feedback, where feasible, and Commission staff feedback;
- The Advice Letter is consistent with approved tariffs providing CAP customers with their benefits;
- The metrics in the plan for tracking and reporting progress toward the transition plan goals are specific, measurable, and meaningful; and the methodology, including dates of measurement periods, for calculation of any baseline value and each monthly (at minimum) progress tracking value for metrics is clear;
- It appears likely that the timing of activities and the ME&O strategy in the transition plan will result in a positive impact

from customer perspective compared to IOUs operating in absence of the transition plan;

- The ME&O efforts are coordinated with and not duplicative of existing marketing, outreach and education efforts, efficient and effective use of existing marketing education and outreach efforts and associated funds is demonstrated, and the customer lens is clearly articulated; and
- The IOU's implementation of its proposed transition plan will not preclude its compliance with existing statutes, regulations, ordinances.

### **Authorities Delegated to Division Director**

The director of the division reviewing and disposing of Transition Plan Advice Letters is delegated the authority to direct a utility to conform to another utility's proposed activity in their transition plan activities timeline and/or ME&O strategy where it is applicable and beneficial for consistency statewide. The director of the division also has delegated authority to direct consistency across utilities in tracking and reporting.

In order to anticipate and prepare for implementation of the transition plans, utilities should read other IOUs' draft Transition Plan Advice Letters submitted on February 25, 2021 to the LIOB to identify similarities and differences, and evaluate for themselves areas of improvement, consistency, and best practices to incorporate into their own plans before submission of the final Advice Letter.

As tracking costs within a memorandum account does not constitute approval of cost recovery, no further approval by staff will be necessary for the IOU to track any incremental costs noted in Transition Plan Advice Letters to the CPPMA or CEMA. However, IOUs, per the discussion above, should seek every opportunity to constrain implementation costs by alignment with existing ME&O efforts, and should provide detail and justification of incremental costs for the plans required here. IOUs should be prepared to answer questions from LIOB members and Commission staff about incremental cost estimates.

### **COMMENTS**

Public Utilities Code section 311(g)(1) provides that this Resolution must be served on all parties and subject to at least 30 days public review and comment prior to a vote of the Commission. Section 311(g)(2) provides that this 30-day period may be reduced or waived "in an unforeseen emergency ... ." The Commission's Rules of Practice and Procedure also provide that public review and comment may be waived or reduced in an "unforeseen emergency situation" specifically where there are "[a]ctivities that severely

impair or threaten to severely impair public health or safety...” (Rule 14.6(a)(1) and/or where there are “[c]rippling disasters that severely impair public health or safety.” (Rule 14.6(a)(2)). “Requests for relief based on extraordinary conditions in which time is of the essence.” (Rule 14.6(a)(2)). “Unusual matters that cannot be disposed of by normal procedures if the duties of the Commission are to be fulfilled.”

The 30-day comment period is shortened to 14 days pursuant to these authorities due to the ongoing COVID-19 pandemic in California.

Opening Comments are due on January 22, 2021, and Reply Comments are due on January 29, 2021. Interested persons can also participate in the Advice Letter processes directed by this Resolution.

In order to better disseminate the directives in this Resolution it was served on the following service lists:

A.19-11-003, A.20-03-014 (California Alternate Rates for Energy and Energy Savings Assistance Programs of large IOU and SMJU)

A.19-09-014 (SDG&E Application to Eliminate Seasonal Differential in Residential Rates)

R.18-07-006 (Assessing Utility Service Affordability)

R.18-07-005 (New Approaches to Disconnections and Reconnections)

R.18-03-011 (Emergency Customer Protections)

R.17-06-024 (Evaluating Low-Income Rate Assistance Programs for Water Utilities)

R.15-03-010 (Access to Affordable Energy in the San Joaquin Valley)

R.12-06-013 (Examination of IOUs’ Residential Rate Structures)

## **FINDINGS**

1. On March 4, 2020, Governor Newsom declared a State of Emergency in California related to COVID-19.
2. On March 19, 2020, Governor Newsom ordered Californians to shelter in place except to meet essential needs.
3. Social distancing and shelter-in-place requirements have required the closure of non-essential businesses and resulted in layoffs.

4. 54 counties, representing 99.6% of California's population, are in the most restrictive tier of California's reopening roadmap.
5. Californians are being asked to stay home between 10:00 p.m. and 5:00 a.m.
6. California has recovered less than half of the nonfarm jobs it lost early in the COVID-19 pandemic.
7. Lingering unemployment due to the COVID-19 pandemic creates a risk that residential and small business customers may continue to fall behind on utility payments through no fault of their own.
8. The California Department of Public Health expects to be able to vaccinate most Californians against COVID-19 by summer 2021.
9. Dr. Anthony Fauci predicts that the United States could reach early herd immunity by spring or summer 2021.
10. The Commission has previously issued Resolutions and opened Rulemakings to address highly disruptive events, most recently in response the devastating wildfires in Northern and Southern California.
11. In response to the reoccurring natural and manmade disasters, the Commission opened Rulemaking (R.) 18-03-011 and adopted customer protection measures adopted in decisions (D.)19-07-015 and D.19-08-025.
12. Having access to essential utility services is critical to maintaining Californians' health and safety during the COVID-19 pandemic.
13. In order to continue to assist Californians affected by the ongoing COVID-19 pandemic, it is reasonable to provide continuity and consistency between all utility actions related to the pandemic by extending the effectiveness of the customer protection measures ordered in Resolution M-4842 through June 30, 2021, and the Commission reserves an option to extend.
14. The number of customers in arrears, and the arrearage amount, has increased significantly since March 2020.
15. Challenges and solutions to transitioning off the Emergency Customer Protections were presented at CPUC-hosted workshops on October 30 and November 12, 2020.

16. The Emergency Customer Protections extended to communications customers in Resolution M-4842 did not include a moratorium on disconnections for nonpayment, however the Commission imposed a 90 day moratorium on disconnections for non-payment for communications customers in Resolution M-4848, therefore we determine that outreach to customers concerning the expiration of the Emergency Customer Protections is sufficient and that communications corporations are not required to file transition plans.

**THEREFORE, IT IS ORDERED that:**

1. Electric, gas, communications, and water corporations subject to this Resolution shall continue to apply the customer protection measures for residential and small business customers adopted in D.19-07-015 and D.19-08-025, as ordered by Resolution M-4842, through June 30, 2021.
2. Electric, gas, communications, and water corporations subject to this Resolution shall file a Tier 1 Advice Letter no later than 10 days after this Resolution's approval demonstrating compliance with the extension of Emergency Customer Protections to June 30, 2021. Should any of the actions utilities are taking to implement Emergency Customer Protections need be revised from already disposed Resolution M-4842 Advice Letter compliance filings, or if certain customer protections were inapplicable during the pandemic and not already noted and accepted as such in prior filings, these revisions should be noted in the compliance Advice Letter to this Resolution. Electric and gas corporations shall serve copies of the Advice Letters to R.18-03-011, A. 14-11-007, A.15-02-001, A.19-11-003, A.20-03-014, R.15-03-010, R.18-07-006, R.18-07-005, R.12-06-013, and A.19-09-014 proceeding service lists. Water corporations shall serve copies of the Advice Letters to R.18-03-011 and R.17-06-024 proceeding service lists. Communications utilities shall serve copies of the Advice Letters to the R.18-03-011 proceeding service list.
3. Commission staff will review the Tier 1 Advice Letters for compliance with the customer protection measures adopted in D.19-07-015 and D.19-08-025 and Resolution M-4842 and this Resolution.
4. The electric, gas, communications, and water corporations subject to this resolution shall continue to conduct community awareness and public outreach of the customer protection measures adopted in D.19-07-015 and D.19-08-025, as ordered in Resolution M-4842, consistent with the requirements of D.19-07-015, D.19-08-025, and D.20-03-004.<sup>25</sup>

---

<sup>25</sup> The requirements in D.19-08-025 apply to the communications service providers. The requirements in D.19-07-015 and D.20-03-004 apply to the electrical corporations. The requirements in D.19-07-015 apply to the natural gas and Class A and Class B water corporations.

5. Electric, gas, and water corporations subject to this Resolution shall each file Tier 2 Advice Letter with their transition plans for the expiration of Emergency Customer Protections by April 1, 2021. The transition plans shall include 1) a timeline of new start and resumed activities, 2) a marketing, education and outreach (ME&O) strategy, 3) an explanation of the activities timeline and ME&O strategy accounts for compliance and safety, and 4) a progress tracking and reporting plan. The goal of the transition plan is to proactively enroll customers in programs to manage their utility bills and inform relevant customers of the changes to programs they are already on, to effectively ease customers through a transition off of Emergency Customer Protections. Electric and gas corporations shall serve copies of the Advice Letters to R.18-03-011, A. 14-11-007, A.15-02-001, A.19-11-003, A.20-03-014, R.15-03-010, R.18-07-006, R.18-07-005, R.12-06-013, and A.19-09-014 proceeding service lists. Water corporations shall serve copies of the Advice Letters to R.18-03-011 and R.17-06-024 proceeding service lists.
6. By February 25, 2021, electric, gas, and water corporations subject to this Resolution shall submit drafts of Transition Plan Advice Letters to CPUC staff (Gillian.Weaver@cpuc.ca.gov), who will share them with the LIOB.
7. This order is effective today.

I certify that the foregoing resolution was adopted by the California Public Utilities Commission at its regular meeting of February 11, 2021 and the following Commissioners approved favorably thereon:

/s/ RACHEL PETERSON

---

Rachel Peterson  
Executive Director

MARYBEL BATJER  
President  
MARTHA GUZMAN ACEVES  
CLIFFORD RECHTSCHAFFEN  
GENEVIEVE SHIROMA  
Commissioners

# **ATTACHMENT C**

**BEAR VALLEY ELECTRIC SERVICE, INC.  
COVID-19 EMERGENCY CUSTOMER PROTECTIONS TRANSITION  
PLAN**



**BEAR VALLEY ELECTRIC SERVICE, INC.**  
**COVID-19 EMERGENCY CUSTOMER PROTECTIONS**  
**TRANSITION PLAN**

April 01, 2021

Sean Matlock  
Manager Energy Resource  
Bear Valley Electric Service, Inc.  
42020 Garstin Drive  
P. O. Box 1547  
Big Bear Lake, CA 9231  
sean.matlock@bvesinc.com

# TABLE OF CONTENT

<b>I.</b>	<b>INTRODUCTION.....</b>	<b>1</b>
<b>II.</b>	<b>ACTIVITIES TIMELINE .....</b>	<b>2</b>
<b>III.</b>	<b>MARKETING, EDUCATION, AND OUTREACH STRATEGY.....</b>	<b>4</b>
<b>IV.</b>	<b>COMPLIANCE AND SAFETY .....</b>	<b>7</b>
<b>V.</b>	<b>PROGRESS TRACKING AND REPORTING .....</b>	<b>11</b>

# **BEAR VALLEY ELECTRIC SERVICE, INC.**

## **COVID-19 EMERGENCY CUSTOMER PROTECTIONS TRANSITION PLAN**

### **Resolution M-4849**

#### **I. INTRODUCTION**

Pursuant to Resolution M-4849, Bear Valley Electric Service, Inc. (“BVES”) submits its Transition Plan (“Plan”) on how it intends to ease customers off the Emergency Customer Protections (“Emergency Protections”) established in Resolution M-4842. The Emergency Protections are scheduled to expire on June 30, 2021. BVES’s Plan objectives are to provide an effortless and seamless transition for customers to manage their negative balance, become current on their bills, and to start the momentum for the State of California to recover from the pandemic. The objectives and principles of BVES’s Plan are outlined below.

##### **A. Transition Plan Objectives**

- To reduce the apprehension of customers when the Emergency Customer Protections ends, BVES’s plan has two objectives:
  1. To facilitate customers transitioning from a set of emergency protection programs to enrolling in programs that are already familiar to them but extended to manage their utility bills; and
  2. To utilize outreach strategies to inform customers about customer assistance programs and to enroll customers into programs designed to assist their bills and arrearage management.

##### **B. Transition Plan Guiding Principles**

- To ensure that the transition to the extended programs are effortless and seamless to customer experience;
- To ensure that the extended programs do not unwittingly create further financial constraints to customers;
- To involve stakeholders and customers at each step of the transition process; and
- To establish a structure that facilitates both BVES staff and customers to manage.

## II. ACTIVITIES TIMELINE

Resolution M-4849 provides that “The IOUs’ transition plans shall map out a timeline of activities associated with programs or initiatives that assist customers in bill management.”<sup>1</sup>

The activities timeline should include both (1) a timeline for the resumption of standard activities that BVES suspended due to the Emergency Protections activation and (2) a timeline for new activities that BVES will implement to provide a smooth transition for customers.

### **A. Summary of General Steps Mandated under Resolution M-4849**

- **February 11, 2021** – Resolution M-4849 adopted by the Commission.
- **February 21, 2021** –Deadline for BVES to file Tier 1 Advice Letter demonstrating compliance with the extension of Emergency Protections to June 30, 2021.
- **February 25, 2021** – BVES submits draft Transition Plan Advice Letter to the Commission.
- **March 11, 2021** – LIOB discusses BVES draft Transition Plan during its quarterly meeting.
- **April 1, 2021** – BVES files final Transition Plan Advice Letter that incorporate feedback from LIOB and the Commission.

### **B. Resumption of Disconnections for Non-Payment**

- **90 days prior to Disconnection Policy Resumption Date (July 1, 2021)** – BVES will begin sending out notices to customers informing them that the utility will resume applying standard disconnection procedures under its tariffs. BVES will make every attempt to connect with potentially at risk customers. BVES will call each customer in the greater than 90 day past due bill category and attempt to make payment arrangements for each active account prior to July 1, 2021, based on its current payment arrangement practices. Payment terms include keeping active account current while making timely arrangement payments on a set schedule determined by the customer up to 12-months in length. i.e. weekly, bi-weekly or monthly payments.
- **Disconnection Policy Resumption Date on July 1, 2021** – BVES will begin resuming standard disconnection procedures i.e. process for bills that are delinquent past the due date and non-payment. BVES will individually reach out to impacted customers in the greater than 90 day past due bill category at risk of disconnection and offer an opportunity to participate in a payment arrangement plan prior to disconnection. If a customer is engaged in one of those types of payment assistance plans and the customer is making timely payments under that plan, the customer will not be disconnected.
- **Disconnection Policy Resumption Date on July 5, 2021 for non-payment** – BVES will reinstate its disconnection process for non-payment pursuant to standard disconnection

---

<sup>1</sup> Resolution M-4849, page 11

procedures under its tariffs. All customer accounts that are not on payment plans at this time will be subject to disconnection. Prior to any disconnection for non-payment, BVES provides notice to customers as outlined in its tariffs.

- Customer is sent a reminder notice approximately 15 days after receiving their original bill and due date (35 days total).
- If payment is not received by the 15<sup>th</sup> day, the customer receives a notice of termination which allows for an additional 10 calendar days before disconnection.

**C. Resumption of Verification/Recertification of Eligibility for Assistance programs**

- **April 2021 through June 2021** – BVES will begin sending out written notices to all applicable customers, i.e. CARE participants, customers on Life Support, informing them that BVES will resume applying the standard eligibility verification and recertification requirements under its tariffs after June 30, 2021.
- **July 1, 2021** – BVES will resume standard eligibility verification and recertification procedures for applicable customers.

**D. Late Payment, Reconnection, or Other Customer Fees**

- **April 2021 through June 2021** – BVES will roll out its public relations campaign on various media platforms to inform customers that COVID-19 related consumer protections will be expiring as of June 30, 2021 and customers are encouraged to call the BVES main office to arrange for a payment plan in advance of that date.
- **July 1, 2021** – BVES will resume applying standard late payment, reconnection, or other customer fees to customer accounts, if applicable.

**E. Assistance Programs for Customers:**

- BVES will identify all medical needs customer within both the 61-90 and greater than 90 day past due categories and set the payment plans up to 12 months in length if the customers wish to do so.
- BVES will also assist these customers with any available assistance funds such as San Bernardino County Home Energy Assistance Program (HEAP) to help restart debt recorded on their account and assure that these customers have applied for and are current with ESA, CARE, and/or medical baseline.
- When assisting a customer with a payment plan, BVES also evaluates and identifies other assistance programs for which the customer is eligible.

BVES realizes that despite making every effort and allowing for generous payment plans, some customers will not pay their bills, such as allowing utility costs to stack up, which is akin to amassing compounding personal credit card debt. BVES also realizes the need to balance cost shifting between rate classes where one discount or special program is paid for by the remaining rate classes that are not participating in the program.

Although a very rare occurrence and under normal operating conditions, certain customers refuse to pay their bills and eventually the customer is disconnected for nonpayment and the debt is written off until such time that the customer tries to reestablish credit with the utility. Although BVES is reluctant to deviate from its normal operating practices, BVES realizes these are not normal conditions due to the pandemic and BVES is willing to write-off a very small subset of customer debt and keep service established if required to do so. BVES welcomes Commission recommendations on this matter.

Furthermore, BVES does not currently have debt forgiveness program. On February 11, 2021, the Commission opened Rulemaking No. (“R”) 21-02-014 “Order Instituting Rulemaking to Address Energy Utility Customer Bill Debt Accumulated During the COVID-19 Pandemic” to address arrearage forgiveness.

The purpose of R. 21-02-014 is to establish necessary special relief mechanism for customers (applicable to both low-income and non-low-income) who accumulated debt during the pandemic. BVES is respondent to this proceeding and will closely monitor any developments. BVES welcomes Commission recommendations on this matter and will conform to results of R. 21-02-014 as required.

### **III. MARKETING, EDUCATION, AND OUTREACH STRATEGY**

Resolution M-4849 provides that IOUs shall include a coordinated, effective, and efficient strategy for their marketing, education, and outreach plan to engage and enroll customers in new bill management programs and inform currently enrollees about expiring protections.

The following Marketing, Education, and Outreach (“ME&O”) Strategy supports the Transition Plan in effectively easing customers through a transition off of protections by proactively communicating with customers to enroll them in programs to manage their utility bills and informing them of the changes to programs in which they are already enrolled.

Starting in April 2021, BVES will implement the following ME&O strategy:

- **April 2021 through June 2021** – BVES will roll out its public relations campaign on various media platforms to inform customers that COVID-19 related Emergency Protections will be expiring as of June 30, 2021 and customers are encouraged to call BVES to arrange for a payment plan in advance of that date.
- **April 2021** – BVES will contact each customer in the greater than 90-day timeframe past due bill list and attempt to make payment arrangements for each active account starting prior to July 1, 2021. Payment terms include keeping the customer active account current and making timely arranged payments on a set schedule determined by the customer.

#### **A. ME&O Target Audiences**

- The ME&O Strategy is intended to reach customers at large, with specifically targeted categories of customers as follows:
  - Customers enrolled in payment based arranged plans.
  - Customers with arrears for 61-90 days and greater than 90 days past due.
  - Customers with arrears and have medical needs.
  - Customers on assistance programs

BVES will identify all medical needs customers within both the 61-90 and greater than 90 day past due categories, to inform and provide them with the option to set the payment plans should the customers wish to do so, up to the maximum payment plan length of 12 months, unless otherwise requested by customers.

BVES will also assist these customers with any available assistance funds such as the San Bernardino County Low Income Home Energy Assistance Program (“LIHEAP”) and ensure that customers have applied for and are current with the ESA, CARE, and medical baseline programs.

#### **B. ME&O Activities for All Customers**

- As part of its ongoing efforts, BVES will continue to coordinate customer information with the local natural gas and water providers. For bill messaging, BVES plans to outline a defined path forward for its customers. BVES’s Transition Plan includes notifying consumer that protections are ending, customers are encouraged to call BVE to make payment arrangements prior to the expiration of the Emergency Protections, and provide information about assistance programs such as HEAP, CARE, and ESA. All BVES personnel will be trained regarding the requirements of the Transition Plan and how staff can help to coordinate efforts across utility providers. BVES is currently providing and will continue to provide all outreach information to its customers in both Spanish and English.
- BVES will leverage existing communications channels to educate and engage customers about the June 30, 2021 expiration of the Emergency Protections; programs available to help customers maintain service; electrical efficiency and rebate programs that can help customers use less electricity reducing their energy bill; and where necessary, information about the establishment of bill payment program.
- BVES commonly used communication tools include but are not limited to bill inserts, customer service talking points and training, phone message prompts which is automatically activated during welcome/on-hold messages, office signage, website notifications, social media, radio, and the local newspaper.

#### **C. Targeted Outreach**

- In addition, BVES will undertake proactive outreach to targeted customers. Tools may include the following, as appropriate:
  - Automated or manual phone calls that are targeted at specific audiences.
  - Emails or direct mail targeted at specific audiences.
- Targeted outreach will convey the following information, including but not limited to:
  - Commission information about pending changes to a customer’s service or program enrollment status.
  - Needed customer actions, including re-certifications to remain eligible for programs.
  - Payment plans and options available to help customers maintain service or manage arrearages.
  - Bill assistance programs.
  - Applicability of late-payment, reconnection, and other fees to a customer.
  - Noticing of risk of disconnection.
  - Customer assistance options for Life Support.

#### **D. Additional ME&O Activities and Tools**

- Additional channels for customer communication and targeted outreach that may be undertaken by BVES include, but not limited to:
  - Company web site.
  - Social media.
  - News releases to local media.
  - Virtual community meeting.
  - Direct contact at customer residence, i.e. door tags.
  - Materials in multiple languages as required by the Commission.
  - Advertising such as print, or social media.

#### **E. Partnerships**

- BVES works closely with City and County agencies, the Chamber of Commerce, stakeholders and organizations in the community on all matters including COVID-19, Public Safety Power Shutoffs, and Wildfire Mitigation. Coordination with stakeholders include but is not limited to disseminating BVES outreach materials, directing residents to BVES for information, and if appropriate consensual data sharing. BVES will continue its routine data sharing with other utilities related to low-income programs.
- BVES does not have any CCAs in its service territory

#### **F. Incremental ME&O Costs**



- At this time BVES does not request any incremental costs to comply with its proposed ME&O activities. BVES will strive to utilize existing authorized funds in implementation of its proposed ME&O activities as recommended in Resolution M-4849. Should additional funding be required, BVES will continue to record any incremental costs in its COVID-19 Pandemic Protections Memorandum Accounts (“CPPMA”)<sup>2</sup>.

#### **IV. COMPLIANCE AND SAFETY**

Resolution M-4849 provides that BVES must explain in its Transition Plan Advice Letter how the transition plan maintains alignment with program enrollment targets, program eligibility requirements, and how customer protections in effect outside the COVID-19 Emergency Protections are aligned.

##### **A. Alignment with Program Enrollment Targets and Requirements**

- **Resolution M-4842 Background & Requirements:**
  - On March 19, 2020 and in compliance with Resolution M-4842 orders, BVES established Emergency Protections. The Emergency Protections requires BVES to adopt the following actions, but not limited to, in order to protect customers from financial hardship during the pandemic:
    - Waive deposits for all customers. In addition, BVES offers various payment plan options for its customers. BVES Customer Service personnel works closely with customers to determine a payment plan based on each individual needs and ability to pay.
    - BVES paused review of CARE program eligibility, renewal, and recertification. BVES is suspending the removal of CARE participants due to their high usage of electricity. High Usage customers are flagged to be reviewed at a later date.
    - BVES currently does not have community outreach contractors. Due to its small service territory, BVES does not have “hard-to-reach low-income” customers. BVES is currently building relationships with Community Based Organizations to help distribute information on BVES programs, e.g. CARE throughout the community. Since March 2020, BVES has encouraged newly eligible customers to sign up for CARE.
    - BVES’s ESA program contractor stopped treatment in March 2020. Treatment resumed in July 2020 by appointment only. The goal of BVES’s ESA program is to inform customers about energy efficiency methods and provide measures to help and improve a customer home energy efficiency. BVES is available and able to

---

<sup>2</sup> Resolution M-4849, page 4

- deploy ESA treatment covered under BVES's ESA contractor's scope of work if emergency needs arise.
- In March 2020, following the Governor Declaration of State of Emergency, BVES posted its Emergency Protections on its website and at its local business office in Spanish and English. BVES communicates to its customers by email, news outlets, door postings at BVES office, and by social media to disseminate COVID-19 Emergency Protections information. Therefore, BVES believes it is in compliance with Section 8386(c)(16)(b).

## **B. BVES Results of Emergency Protections Requirements**

BVES presents below the results of its compliance with Resolution M-4842. Table 1 provides the number of BVES customers who participated in the CARE program in 2019 and 2020 and includes those who have been recertified and new applicants. Table 2 shows the current number of BVES payment plans (plans that were fulfilled and plans where customers did not keep their payment plan obligation) and amount established in March 2020 to present. Table 3 provide the number of accounts and related dollar amount in the month of March 2020 that were delinquent between 60-90 days and greater than 90 days. Table 4 provide the number of accounts and related dollar amount in the month of February 2021 that were delinquent between 60-90 days and more than 90 days.

**Table 1 – Number of Recertified and Newly Applied CARE Participants in 2019 - 2020 by Month**

	<b>CARE Recertification 2019</b>	<b>CARE Recertification 2020</b>	<b>CARE New Applications 2019</b>	<b>CARE New Applications 2020</b>
January	50	41	37	29
February	36	45	33	17
March	47	42	30	31
April	69	65	25	38
May	62	41	28	17
June	70	32	56	16
July	39	57	26	35
August	65	89	25	86
September	66	65	19	28
October	46	60	30	11
November	40	32	27	10
December	59	48	22	14
<b>Subtotal</b>	<b>649</b>	<b>617</b>	<b>358</b>	<b>332</b>

The Grand Total number of recertified and new application of CARE participants for 2019 is 1,007, while it is 949 in 2020. Total CARE customers as of February 2021 is 1,786.

**Table 2 – Total Number of BVES Payment Plans and Dollar Amount Established in March 2020 to Present**

<b>Count</b>	<b>Status</b>	<b>Dollar Amount</b>
11	Active	\$15,661.88
223	Broken (obligation not met)	\$178,268.73

**Table 3 - Aging Report as of March 2020 with Delinquent Accounts**

<b>Customer Class</b>	<b>Count</b>	<b>61-90 days</b>	<b>Past 90 days</b>
Full-time Residents	3,973	\$66,728	\$154,025
Part-Time Residents	9,764	\$46,247	\$121,457
CARE Participants	1,202	\$16,914	\$41,708
Commercial	1,111	\$20,138	\$119,671
<b>Total</b>	<b>16,050</b>	<b>\$150,027</b>	<b>\$436,861</b>

**Table 4 - Aging Report as of February 2021 with Delinquent Accounts**

<b>Customer Class</b>	<b>Count</b>	<b>61-90 days</b>	<b>Past 90 days</b>
Full-time Residents	4,511	\$53,768.88	\$153,264.07
Part-Time Residents	8,118	\$36,218.75	\$103,020.64
CARE Participants	1,527	\$13,224.30	\$40,477.62
Commercial	984	\$13,878.91	\$116,293.45
Total	15,140	\$117,090.84	\$413,055.78

**C. Marketing Education and Outreach (ME&O):**

Following the establishment of the Emergency Protections BVES expanded its notification program to customers and small businesses via the following channels:

- Website – BVES lists Emergency Protections on its website.
- Social Media – BVES posts content highlighting the emergency relief customer protections on Facebook at regular intervals.
- Customer Email/Newsletter – BVES disseminates by email, direct mail and in BVES’s biannual newsletter, information regarding emergency relief customer protections.
- News Release/Media Advisory – BVES issues a media advisory to local media outlets regarding the Emergency Protections available to consumers.
- Community Outreach – BVES makes available copies of its disaster protection plan, which is posted at its office door.
- Customer Ambassadors/Employees – BVES develops and issues detailed information regarding the Emergency Disaster Relief Protections program to employees so they are knowledgeable to answer any questions from customers specifically regarding COVID-19.
- Outreach to Low-Income Customers – BVES continues to include information regarding emergency relief protections to all of its customers including those enrolled in the CARE program.

In addition, BVES has reached out to customers who are directly impacted by the Emergency Protections event by:

- Targeted Outreach to Impacted Customers – BVES will attempt to contact impacted customers by the Interactive Voice Recognition (IVR) system or two-way text communications.
- Local Governments – BVES will alert the City of Big Bear Lake and the County of San Bernardino via email and/or by telephone regarding emergency relief protections available to customers.
- Outbound Dialing – BVES will utilize its IVR system to place outbound emergency relief calls during an event.

- Customer Contact Center – BVES’s (800) 808-2837 phone number will be made available 24/7 during a state of emergency to provide information to customers regarding service.

Furthermore, BVES has received very little feedback from customers regarding COVID-19 protections. It is likely that many customers may be expecting some sort of debt relief from the State of California or many accounts have simply become inactive or are now out of business due to the pandemic.

### **C. Ensuring That Activities Are Safe and Consistent with All Appropriate State and Local Health Orders**

- BVES’s Plan does not conflict with other established company programs such as CARE or other State and Local Health ordinances.
- Protected customers have the same responsibility to pay for their share of the Commission authorized tariff as do all customer classes. BVES will give each customer class the opportunity to bring their account current through a lengthy payment plan and will continue to wave deposits for customers who are still struggling through the Transition Plan timeline and beyond.

## **V. PROGRESS TRACKING AND REPORTING**

Resolution M-4849 provides that “IOUs must include a plan for reporting progress on activities in the timeline and present metrics they will track and report to monitor success in achieving the goal of effectively easing customers through a transition off of Emergency Customer Protections by proactively enrolling customers in programs to manage their utility bills and informing relevant customers of the changes to programs in which they are already enrolled. Reporting frequency shall be monthly and the first report shall include baseline data associated with progress metrics...Energy IOUs shall report these progress metrics monthly by including them in the monthly report required by the Disconnections Proceeding, R.18-07-005.”<sup>3</sup>

### **A. Background and Protocols for Progress Tracking and Reporting**

- BVES will track the progress of the transition efforts starting April 2021 and beyond. It is likely some customers may choose to contact BVES before the June 30th deadline and enter into a voluntary payment plan. Should a customer contact BVES, the customer may take advantage of a payment arrangement up to 12-months in length. Customer may request shorter length. It is not BVES’s intention to disconnect any customers without giving them proper time and opportunity to fulfill their payment obligation.

---

<sup>3</sup> Resolution M-4849, pages 14-15

- BVES will report these metrics in its monthly report required by R.18-07-005.

## **B. Metrics to Track Continued Enrollment in Bill Assistance Program**

- BVES will provide the following metrics to track customers who are enrolled in a CARE bill assistance program when Emergency Protections were in place and who are successful in sustaining their enrollment in the CARE program if they still meet eligibility criteria.
  - Number and percentage of newly enrolled customers who are able to stay on BVES's CARE program post June 30, 2021.
  - Number and percentage of customers required to take actions to remain on BVES's CARE programs and are successfully recertified.

## **C. Metrics to Track Enrollments of Impacted Customers in New Payment Programs**

- BVES will provide the following metrics to track enrollment of impacted customers in new noted programs.
  - Number and percentage of customers enrolled in alternative payment arrangements, which are defined as enrollment in an amortization agreement, alternative payment schedule, or a plan for deferred or reduced payment.
  - Number of payment plans created, active, and unmet obligation, by payment plan length.
  - Number and percentage of customers who are disconnected.
  - Change in arrearage amounts.
  - Number of BVES customer calls concerning alternative payment arrangements.
  - Number of customers enrolled in LIHEAP, CARE, and ESA program.