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March 19, 2020

Advice No. 5604  
(U 904 G)

Public Utilities Commission of the State of California

**Subject: Implementation of Emergency Disaster Relief Program in SoCalGas' Service Territory in Response to the COVID-19 Incident to Provide Residential Customer and Non-Residential Customer Protections Pursuant to Ordering Paragraph (OP) 1 of Decision (D.) 19-07-015**

### **Purpose**

Consistent with OP 1 of the California Public Utilities Commission (Commission or CPUC) D.19-07-015 implementing a Disaster Relief Program (DRP), the Commission's DRP directive encouraging utilities to implement assistance programs to support customers during times of emergency, and the Commission Executive Director's March 17, 2020 letter (subject to Commission ratification) addressing Emergency Customer Protections to Support Customers Affected by the COVID-19 State of Emergency, Southern California Gas Company (SoCalGas) hereby submits to the Commission this Tier 1 Advice Letter (AL) to notify the Commission of SoCalGas' implementation of emergency customer protections for residential and small businesses impacted by the novel coronavirus (COVID-19) pandemic.

### **Background**

In OP 1 of D.19-07-015, the Commission established a permanent set of minimum emergency disaster customer protection measures that the Utilities are mandated to implement in the event of a declared emergency. The Commission's emergency disaster customer relief protections shall apply to utility customers in affected areas in a state of emergency declared by the Governor of California or the President of the United States. Consistent with OP 2 of D.19-07-015, the Investor Owned Utilities must submit a Tier 1 advice letter with the Commission's Energy Division within 15 days of a governor's state of emergency declaration or a presidential state of emergency proclamation.

On March 4, 2020, Governor Gavin Newsom (Governor) declared a Statewide emergency to make additional resources available, formalize emergency actions already underway

across multiple state agencies and departments, and help the State prepare for a broader spread of COVID-19. Many California communities are under “Shelter in Place” orders and the Center for Disease Control and Prevention has recommended that gatherings of any kind be limited to less than 10 people. SoCalGas is committed to complying with directions from the Commission, the state of California, and the federal government in response to the evolving pandemic.

In response to this growing pandemic, SoCalGas has suspended disconnections, implemented flexible payment plans for all residential and small business customers, and has waived late payment fees for its core commercial customers. These customer protections will remain in place until further notice. As noted above, on March 17, 2020, the Commission’s Executive Director issued a letter, subject to Commission ratification, directing utilities to extend the “applicable customer protections directed in D.19-07-015” to customers in response to the COVID-19 crisis. Pursuant to this notice, SoCalGas will implement the applicable consumer protections contained in D.19-07-015 to customers in its service territory who are affected by COVID-19. Though COVID-19 has not 1) resulted in the loss or disruption of the delivery or receipt of natural gas service; nor 2) resulted in the degradation of the quality of natural gas service, SoCalGas understands that customers may be experiencing economic hardship and impacted by numerous measures including social distancing. Therefore, SoCalGas will enact the following applicable emergency customer protections until the end of the emergency declaration by the Governor for those affected by COVID-19:

1. Suspend disconnection of service for residential and core non-residential customers.
2. Suspend collection of Late Payment Charge for core non-residential customers.
3. Offer extended payment arrangements.
4. Suspend reassessment of credit worthiness that would trigger the imposition of a new or additional deposit request for residential customers.
5. Suspend recertification requirements for customers enrolled in the California Alternate Rates for Energy (CARE) program, and Medical Baseline Allowance (MBL).

SoCalGas will also enact communication of relief measures through social media and other media outlets.

### **Eligibility Requirements for Emergency Customer Protections**

SoCalGas has suspended disconnections, implemented flexible payment plans for all residential and commercial customers and has waived late payment fees for its core commercial customers. These measures will stay in place until further notice. SoCalGas will implement additional consumer protections for all residential and small business customers within its service territory. To the extent possible SoCalGas will extend these protections automatically so that our customers experiencing economic hardship due to COVID-19 State of Emergency, immediately benefit from these relief measures. These relief measures are effective from the start date of the Governor’s emergency proclamation and will remain in place until the Governor announces the end of the COVID-19 State of

Emergency, or as appropriately determined by the Governor's Office of Emergency Services.

### **Description of Adopted Consumer Protections**

In the following section, SoCalGas describes the implementation of each of the residential and non-residential customer protections identified in D.19-07-015 that it believes are applicable to the COVID-19 pandemic. Unless otherwise noted, each of these customer protections are applicable to both residential and small business customers and are effective until the Governor announces the end of the COVID-19 State of Emergency.

OP 1 of D.19-07-015 directs the Utilities to:

#### **(1) waive deposit requirements for affected residential customers seeking to re-establish service for one year and expedite move-in and move-out service requests;**

To SoCalGas' best knowledge, the COVID-19 has not resulted in any involuntary relocation of customers. However, SoCalGas will suspend reassessment of credit worthiness that would trigger the imposition of a new or additional deposit requirements for residential customers.

#### **(2) implement payment plan options for residential customers;**

SoCalGas will extend to customers with service who request an additional grace period for payment, SoCalGas will offer payment plan options as directed for any amount up to the total outstanding balance on the account.

Any eligible customer offered a payment plan will not be precluded from paying off an arrearage more quickly.

#### **(3) suspend disconnection for non-payment and associated fees, waive deposit and late fee requirements for residential customers;**

SoCalGas has suspended all collections activity for all core customers.

Once a customer has established credit as a customer of the utility, the utility will not require that customer to pay additional reestablishment of credit deposits with the utility for either slow payment/no-payment of bills or following a disconnection.

#### **(4) support low-income residential customers by freezing all standard and high-usage reviews for the California Alternate Rates for Energy (CARE) program eligibility, suspend all CARE program removals to avoid unintentional loss of the discounted rate during the period for which the customer is protected under these customer protections, and discontinue generating all recertification and verification requests that require customers to provide their current income information;**

All SoCalGas CARE customers will not be subject to eligibility verification for the duration of the State of Emergency, unless further extended by SoCalGas or the Commission.

High-usage reviews are not applicable to SoCalGas CARE program. All customers currently receiving the CARE discount will continue to do so for the duration of the State of Emergency, unless further extended by SoCalGas or the Commission.

Additionally, SoCalGas will work to suspend generating recertification and verification requests during the State of Emergency. SoCalGas CARE customers will not be required to return recertification and verification requests for the duration of the State of Emergency, unless further extended by SoCalGas or the Commission.

For MBL customers, SoCalGas will suspend generating recertification requests during the State of Emergency. SoCalGas MBL customers will not be required to return recertification requests for the duration of the State of Emergency, unless further extended by SoCalGas or the Commission.

**(5) indicate how the energy savings assistance program can be deployed to assist impacted customers;**

Effective March 19, 2020, SoCalGas will not deploy energy savings assistance (ESA) contractors to assist affected customers, due to health concerns for customers, contractor personnel and employees. Moreover, these provisions are typically helpful following wildfire, earthquakes, and other disasters – unlike the present situation – in which structures have been damaged, requiring customers in specific areas to relocate.

Due to the special circumstances of COVID-19, SoCalGas will not implement the following protections, including: (1) authorizing expedited move-in and move-out service requests, (2) suspension of estimated energy usage for billing, or (3) discontinued billing as they are not applicable. Consistent with D.19-07-015, these protections were designed for customers who needed to relocate from damaged structures arising from wildfire, earthquakes or other disasters.

**Communications Plan**

SoCalGas will communicate the availability of emergency customer protections to customers in our service territory using one or more communication channels that may include (but is not limited to) community outreach, web pages, media advisories, social media posts and social networking service for neighborhoods such as Nextdoor. SoCalGas will direct customers to SoCalGas' Customer Contact Center, 800-427-2200 and to the SoCalGas website for further assistance. A complete explanation of the protections available will be located on SoCalGas' website at <https://www.socalgas.com/coronavirus> and <https://www.socalgas.com/billing-support>.

**Emergency Customer Protections Memorandum Account (ECPMA)**

SoCalGas will record costs associated with the protections described herein in the ECPMA. SoCalGas will also record unforeseen incremental costs associated with the COVID-19 State of Emergency. This includes, but is not limited to uncollectible expenses above currently authorized uncollectible rates resulting from these customer protections. The costs recorded to this memorandum account will be incurred beginning March 4,

2020, which is the start date of the Governor's emergency proclamation, unless otherwise specified or extended by the order of the Commission.

No cost information is required for this advice letter.

This advice letter will not increase any rate or charge, withdraw service, or conflict with any other schedule, or rule.

### **Protest**

In accordance with General Order (GO) 96-B, General Rule 6.2, this information-only AL is not subject to protest.

### **Effective Date**

This submittal is subject to Energy Division disposition and should be classified as Tier 1 (effective after approval) pursuant to OP 1 of D.19-07-015 and to the March 17, 2020 letter from the Executive Director, Alice Stebbins of the Commission requiring customer protections be retroactively applied. SoCalGas is requesting this submittal be approved and made effective March 4, 2020, which is the start date of the Governor's emergency proclamation.

### **Notice**

A copy of this AL is being sent to SoCalGas' GO 96-B service list and the Commission's service list in R.18-03-011. Address change requests to the GO 96-B service list should be directed via e-mail to [tariffs@socalgas.com](mailto:tariffs@socalgas.com) or call 213-244-2837. For changes to all other service lists, please contact the Commission's Process Office at 415-703-2021 or via e-mail at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).

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Ronald van der Leeden  
Director – Regulatory Affairs

Attachments



# ADVICE LETTER SUMMARY

## ENERGY UTILITY

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

Company name/CPUC Utility No.: Southern California Gas Company (U 904G)

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Ray B. Ortiz

Phone #: (213) 244-3837

E-mail: ROrtiz@socalgas.com

E-mail Disposition Notice to: Tariffs@socalgas.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 5604

Tier Designation: 1

Subject of AL: Implementation of Emergency Disaster Relief Program in SoCalGas' Service Territory in Response to the COVID-19 Incident to Provide Residential Customer and Non-Residential Customer Protections Pursuant to Ordering Paragraph (OP) 1 of Decision (D.) 19-07-015

Keywords (choose from CPUC listing): CARE, Deposits, Memorandum Accounts

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.19-07-015

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: N/A

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: 3/4/20

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

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: N/A

Service affected and changes proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets: N/A

<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: Rav B. Ortiz  
Title: Regulatory Tariff Manager  
Utility Name: Southern California Gas Company  
Address: 555 West Fifth Street, GT14D6  
City: Los Angeles  
State: California Zip: 90013-1011  
Telephone (xxx) xxx-xxxx: (213) 244-3837  
Facsimile (xxx) xxx-xxxx: (213) 244-4957  
Email: [ROrtiz@socalgas.com](mailto:ROrtiz@socalgas.com)

Name: SoCalGas Tariffs  
Title:  
Utility Name: Southern California Gas Company  
Address: 555 West Fifth Street, GT14D6  
City: Los Angeles  
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