

## PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

COMMISSION ADVISORY  
AND COMPLIANCE DIVISION  
Energy Branch

RESOLUTION E-3263  
March 31, 1992

RESOLUTION

RESOLUTION E-3263. ALL ENERGY UTILITIES.  
ORDER REQUIRING ENERGY UTILITIES TO DETERMINE  
OVERLAPPING SERVICE TERRITORIES AND TO DEVELOP  
PLANS TO SHARE CUSTOMER INFORMATION TO MAXIMIZE  
LOW-INCOME RATEPAYER ASSISTANCE AND LOW-  
INCOME WEATHERIZATION PROGRAMS.

SUMMARY

1. California's energy utilities offer Low-Income Ratepayer Assistance (LIRA) Programs for gas and electric service and Low-Income Weatherization (LIW) programs. These energy utilities each operate programs to identify eligible customers within their service areas. Where service areas overlap, the utilities at present do not attempt mutual efforts to identify eligible customers.
2. Pacific Gas and Electric Company, Pacific Power & Light, San Diego Gas & Electric Company, Sierra Pacific Power Company, Southern California Edison Company, Southern California Gas Company, Southern California Water Company, Southwest Gas Corporation and Washington Water Power Company (collectively - the Energy Utilities) offer the LIRA program and all but Southern California Water Company offers the LIW program to its low-income customers.
3. This Resolution requires the Energy Utilities with overlapping service territories to develop plans to share information regarding customer eligibility for the LIRA and LIW programs.

BACKGROUND

1. In compliance with Commission Decisions (D.) 89-07-062 and 89-09-044 which established LIRA, the Commission Advisory and Compliance Division (CACD) has prepared progress reports. In the last two LIRA annual progress reports, CACD indicated that it was desirable for the energy utilities who have overlapping service territories to conduct a study to see if joint outreach could be

undertaken to reach as many eligible customers as possible. the elimination of duplicate efforts to reach the same customer should reduce administration costs.

2. None of the energy utilities with overlapping service areas had attempted any joint outreach with regards to the LIRA program. Some of the energy utilities already are sharing costs in connection with the LIW program. The energy utilities treat customer information as confidential (See Decision 90-12-121 in I. 90-01-033, issued December 27, 1990 mimeo, p. 10).

#### DISCUSSION

1. The Commission's Legal Division has concluded that energy utilities with overlapping service areas can share customer information to identify customers' eligibility for the LIRA and LIW programs. Public Utilities Code Section 761.5 states that where the Commission determines that it would be cost-effective, the Commission shall authorize electric and gas corporations to participate in a centralized credit check system to share information on customers. It permits such corporations to share customer information with telephone corporations and publicly owned public utilities.

2. Section 761.5 also states that a utility cannot use any information obtained from the credit check system database for internal marketing purposes. It also states that a utility may release pertinent information to a collection agency for the purpose of collecting an outstanding bill but shall not otherwise release, transfer, or sell any information obtained through the credit check system.

3. Section 761.5 makes gas and electric corporations which participate in centralized credit check systems subject to the federal and state laws governing credit agency reporting. The relevant provisions of the federal credit reporting laws are virtually identical to the state laws (see 15 U.S.C. Section 1681 et seq.). These laws allow the sharing of information regarding the eligibility of customers for government agency benefits. Therefore, the energy utilities which participate in centralized credit checking systems could share the information regarding customer eligibility for the LIRA and LIW programs.

4. Sharing customer information may reduce duplicate administration costs and increase the number of participants. For example, Southern California Edison Company and Southern California Gas Company serve a great number of the same customers. It is quite possible that a participating customer may receive a discount rate through the LIRA program on gas service but be unaware that he or she could also be eligible for a discount on the electric bill. Similarly, in the LIW program, since income eligibility is the same for both programs, sharing customer information could be efficient and cost effective and should improve the quality of service to low-income residents.

5. In the Second LIRA Annual Report, Pacific Gas and Electric Company, which uses the certification services of the Department of Economic Opportunity, indicated that over 17 percent of applicants were rejected because they were ineligible for the LIRA program. Customers applying through the self-certifying method used by other energy utilities may be ineligible, but may be accepted into those programs that do not look beyond self-certification. When ineligible customers receive LIRA discounts, all other ratepayers are assessed higher surcharges. Sharing customer information might substantially reduce fraud and excessive surcharges.

FINDINGS

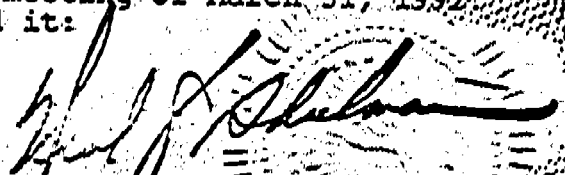
1. The energy utilities offer LIRA and LIW programs to low-income gas and electric customers. Where service areas overlap, the Energy Utilities at present do not share customer information to identify eligible LIRA customers.
2. It is reasonable that sharing customer information in both programs by the energy utilities with overlapping service areas could be more efficient. The reduction of duplicate outreach efforts should reduce administrative costs and increase the number of eligible customers, thereby improving the quality of service to low-income customers.
3. The sharing of customer information in the LIRA and LIW programs could reduce the number of fraudulent participants and lessen surcharges assessed the non-participants.

THEREFORE, IT IS ORDERED that,

1. Pacific Gas and Electric Company, Pacific Power & Light, San Diego Gas & Electric Company, Sierra Pacific Power Company, Southern California Edison Company, Southern California Gas Company, Southern California Water Company, Southwest Gas Corporation and Washington Water Power Company shall determine overlapping service territories and develop plans to share customer information to maximize the Low-Income Ratepayer Assistance and Low-Income Weatherization programs.
2. Pacific Gas and Electric Company, Pacific Power & Light, San Diego Gas & Electric Company, Sierra Pacific Power Company, Southern California Edison Company, Southern California Gas Company, Southern California Water Company, Southwest Gas Corporation and Washington Water Power Company shall notify the Commission Advisory and Compliance Division of their plans for sharing information in both programs by July 1, 1992 and again by July 1, 1993.

3. Copies of this Resolution shall be sent to each energy utility by the Commission Advisory and Compliance Division's Energy Branch.
4. This Resolution is effective today.

I hereby certify that this Resolution was adopted by the Public Utilities Commission at its regular meeting of March 31, 1992. The following Commissioners approved it:



NEAL J. SHULMAN  
Executive Director

DANIEL Wm. FESSLER  
President  
JOHN B. O'BANLAN  
PATRICIA M. ECKERT  
NORMAN D. SHUMWAY  
Commissioners