

BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the
Commission's Own Motion to Address the
Issue of Customers' Electric and Natural
Gas Service Disconnection

Rulemaking 10-02-005
(Filed February 4, 2010)

REPLY COMMENTS OF DISABILITY RIGHTS ADVOCATES

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I. INTRODUCTION

This proceeding was initiated in order to explore ways to assist customers in need and minimize utility disconnections during a time of severe economic crisis in California. The appropriate presumption underlying this effort to help customers is that even struggling customers generally want to pay their utility bills on time. All parties should maintain this perspective, and recognize that customers who fail to pay their utility bills in a timely manner are generally facing a broader financial crisis and struggling to pay bills in general; they are not deliberately trying to avoid their responsibilities. While there are always some bad actors, concerns about deliberate bad behavior should not undermine the premise and goal of this proceeding.

The Opening Comments submitted by the utilities indicate that they have strayed from this proceeding's goal of assisting customers, and instead are disproportionately focused on the risks of intentional bad actors. This comes through in the way the utilities characterize and propose to treat customers who have struggled financially. In these reply comments, Disability Rights Advocates ("DisabRA") seeks to refocus on the goal of this proceeding: to assist, not penalize, people who are in precarious financial situations and who are trying to pay their utility bills.

II. DISABLED CUSTOMERS SHOULD BE AMONG THE PROTECTED GROUP OF "SENSITIVE CUSTOMERS"

The various consumer groups all urge as a minimum that the Commission adopt the definition of "sensitive customers" agreed upon by the parties to the Sempra settlement.¹ Given that Sempra agreed to this definition of sensitive customers without

¹ Comments of The Utility Reform Network on Certain Phase II Issues Identified in the 8/26/2010 Administration Law Judge's Ruling ("TURN Comments"), R.10-02-005, September 15, 2010 at 3; Opening Comments of The Greenlining Institute on the Administrative Law Judge's Ruling Providing Opportunity for Comments and Addressing Other Phase II Issues ("Greenlining Comments"), R.10-02-005, September 15, 2010 at 11; Comments of the National Consumer Law Center on Phase II Issues Pursuant to ALJ Ruling of August 26, 2010 ("NCLC Comments"), R.10-02-005, September 15, 2010 at 4; Opening Comments of the Division of Ratepayer Advocates on Phase II Issues Identified in ALJ Ruling ("DRA Comments"), R.10-02-005, September 15, 2010 at 5. To reiterate, the Sempra settlement defines vulnerable customers as: "self-identified seniors (age 62 or older), self-identified disabled customers, Medical Baseline customers, Life Support customers, or other customers who self-certify that they have a

indicating that it would either overwhelm their systems or incur unreasonable costs, PG&E and SCE should also be able to implement protections for these groups.

In addition to the minimum definition set forth in the Sempra settlement, DisabRA supports TURN's proposal to include additional categories of at-risk customers in the definition of "sensitive customers," including customers who participate in the Third Party notification program, have an infant in the household, or are "on an all-electric rate schedule, and the disconnection is occurring in December, January or February."² DisabRA also appreciates TURN's support for a broad definition of disabled customers and efforts to capture and utilize information on which households fall into various sensitive categories.³ DisabRA notes that Greenlining has taken a consistent position, noting that "the consumer must be made aware that they [sic] may qualify for heightened protections if they self-certify as a sensitive customer."⁴ To this end, Greenlining proposes that each utility should ensure that its customer service representatives ("CSRs") are prepared to educate customers about the protections for sensitive customer groups and should post the same information on their websites.⁵ DisabRA agrees, finding this consistent with our request for outreach and appropriate training of CSRs.

serious illness or condition that could become life-threatening if service is disconnected." (Settlement Agreement Between San Diego Gas & Electric Company, Southern California Gas Company, Disability Rights Advocates, The Division of Ratepayer Advocates, The Greenlining Institute, The National Consumer Law Center, and The Utility Reform Network Resolving Issues in the Residential Disconnection Proceeding ("Settlement Agreement") (R.10-02-005), submitted to the Commission via Joint Motion on September 9, 2010 at § II.G.4.)

² TURN Comments at 11-12. DisabRA also agrees that Sempra should be excluded from the expanded definition if the settlement is approved, based on other benefits of the settlement to disadvantaged customers.

³ TURN Comments at 12 ("[T]he Commission should seize this opportunity to begin capturing additional information that can be used to inform future policy changes, such as dynamic pricing implementation.").

⁴ Greenlining Comments at 11.

⁵ Greenlining Comments at 12.

In contrast, PG&E and SCE seek a narrow definition of “sensitive customers,” which would exclude all people with disabilities except for the subgroup of households that both qualify for and know about Medical Baseline and/or Life Support. While promoting this narrow application of consumer protections, PG&E laments the costs of field visits.⁶ SCE opposes “broad categorical definition that result in more customers being deemed ‘sensitive’ than ‘non-sensitive.’”⁷ DisabRA strongly disagrees with PG&E and SCE’s reluctance to expand the definition of “sensitive customers” to include disabled customers who need extra protections before their power is disconnected. By limiting the number of customers classified as “sensitive,” PG&E and SCE deliberately seek to obstruct application of the protections under consideration in this proceeding, and are prepared to let the risk of harm fall on vulnerable Californians rather than roll extra trucks. This is not consistent with the goals of minimizing shutoffs.

III. THE UTILITIES SHOULD PROVIDE MORE FLEXIBILITY AND INFORMATION ABOUT BILLING CYCLES

Working from the presumption that customers want to pay their utility bills on time, the ideal payment set up would allow all customers to select their monthly billing date.⁸ Nevertheless, DisabRA understands that it may take substantial effort to provide this level of flexibility.⁹ If full flexibility is not possible, other, more limited options, can

⁶ Pacific Gas & Electric Company’s (U 39 M) Opening Comments on Phase II Scoping Memo Issues (“PG&E Comments”), R.10-02-005, September 15, 2010 at 5.

⁷ Southern California Edison Company’s (U 338-E) Opening Comments on the Administrative Law Judge’s Ruling Providing Opportunity for Comments and Addressing Other Phase II Issues (“SCE Comments”), R.10-02-005, September 15, 2010 at 10.

⁸ As noted by Greenlining, “If customers were permitted to align their income and billing cycles, they would be much less likely to face chronic late-fees and eventual disconnection.” Greenlining Comments at 6. DisabRA also supports Greenlining’s advocacy for flexible billing and/or payment dates to all customers if financially feasible, or else, at minimum, to at-risk customers. Greenlining Comments at 8.

⁹ Notwithstanding the utilities’ concerns, NCLC has documented similar programs which demonstrate that “allowing customers to select their own billing date can be done at a reasonable cost to the utility while allowing customers to exert more control over their financial obligations.” NCLC Comments at 3.

further the proceeding's goal of providing assistance to at-risk customers to help them avoid service disconnections. Such options should be adopted.

First, billing flexibility could be provided to a subgroup of customers. To this end, DisabRA supports TURN's suggestion to allow CARE and FERA customers and customers with a history of late payment to choose their billing date.¹⁰ DisabRA also supports DRA's recommendation that the utilities be required to proactively offer customers at risk for disconnection (defined as receiving a 48 hour disconnection notice) a choice of billing date.¹¹

Second, as Greenlining notes, customers generally are more concerned with the date that payment is due than the date that a bill arrives. Thus, "the simple solution to this problem would be to vary the payment date rather than the bill date."¹² DisabRA acknowledges that this solution may not be entirely simple, especially if it results in different customers receiving different periods of time for payment. Nevertheless, payment flexibility may be easier to institute since it would allow the utilities to continue to process outgoing bills on their own schedule.

Finally, even if the utilities cannot provide direct flexibility in due dates, they can and should provide greater transparency to consumers about actual milestones within the billing cycle, including the exact point at which customers will incur penalties or risk disconnections if they do not pay their utility bills.

Currently, based on the sample bills displayed on each utility's web site, utility bills simply state due dates without providing any additional information to customers. PG&E's bills indicate a "due date" after which "your payment will be late;"¹³ SCE's

¹⁰ TURN Comments at 9.

¹¹ DRA Comments at 3.

¹² Greenlining Comments at 8.

¹³ <http://www.pge.com/myhome/myaccount/explanationofbill/res/index.shtml>

indicate “how much you owe and when payment is due;”¹⁴ SDG&E’s indicate “due date and amount due;”¹⁵ and SoCalGas indicates “amount due” and “please pay this amount by [a certain date].”¹⁶

In contrast to the billing statements, the utilities in their comments to the Commission describe additional time available as a “grace period” between the stated due date and the time at which a customer incurs any type of penalty. This information is clearly public, but is not provided to consumers in any direct fashion. Since the utilities have published this information in the context of this proceeding, they should clearly and deliberately share these same milestones with customers. Many customers, especially those who are struggling to pay their bills, would find peace of mind in having this information. In the absence of this information, customers are likely to believe they are at risk of immediate penalty if they miss the stated due date on their bills. For customers who are facing serious economic risk, this likely compounds their ongoing anxiety about their ability to maintain utility services.

Sempra tells the Commission that its customers have an approximate 11-day grace period beyond the stated due date of 19 calendar days after a bill is mailed without facing penalties. The utility may send a late notice during the 11-day grace period, but the customer is not otherwise penalized.¹⁷ PG&E states that its customers “need not change their billing date to obtain flexibility with respect to timing of the payments” because its “collection process does not commence until 42 days after the bill is issued.”¹⁸ SCE tells the Commission that its customers have 19 days from the time the

¹⁴ <http://www.sce.com/newbill/residential1.htm>

¹⁵ http://www.sdge.com/documents/forms/samplebill_res.pdf#zoom=100

¹⁶ <http://www.socalgas.com/business/customerChoice/documents/BillSampleCATUDC.pdf>

¹⁷ Opening Comments of San Diego Gas & Electric Company (U 902E) and the Southern California Gas Company (U 904G) to the Administrative Law Judge’s Ruling Providing Opportunity for Comments and Addressing Other Phase II Issues (“Sempra Comments”), R.10-02-005, September 15, 2010 at 8.

¹⁸ PG&E Comments at 7.

bill is presented to the customer until payment on the bill is due¹⁹ but does not indicate what it tells customers about when bills are due versus when they incur penalties.

According to TURN, “SCE is the only major CPUC-jurisdictional energy utility with a late charge for residential customers, and CARE customers are exempt from paying this late charge.”²⁰ Thus CARE customers, at minimum, should be informed of this benefit.

Providing additional information about billing cycles, including complete information as to when customers will incur financial penalty or risk disconnection if they have not paid their utility bills, would be a simple and low-cost way to ensure that customers are aware of existing payment flexibility. The utilities should share this information (which is already public, though not widely known) with customers through multiple, appropriate, and accessible channels and also integrate this information into the scripts that CSRs use when customers call about payment plans.

IV. EXCEPTIONS TO THE GENERAL RULE FORBIDDING RECONNECTION DEPOSITS FOR CARE/FERA CUSTOMERS SHOULD BE LIMITED AND NARROWLY DEFINED

Phase I of this proceeding clearly articulated that “California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA) customers in the PG&E, SDG&E, SCE, and SoCalGas service territories are not required to pay additional reestablishment of credit deposits with a utility for either slow-payment/no-payment of bills or following a disconnection.”²¹ The decision went on to explain that the “ability of CARE and FERA customers to provide utility deposits following a disconnection is especially problematic since these are the lowest income residential customers.”²²

¹⁹ SCE Comments at 4.

²⁰ TURN Comments at 7.

²¹ Interim Decision Implementing Methods to Decrease the Number of Gas and Electric Utility Service Disconnections (D.10-07-048), R.10-02-005, issued 7/30/10 at 14.

²² *Id.*

Now, in this phase of the proceeding, the Commission is exploring whether limited exceptions to this general rule may be appropriate. While DisabRA recognizes that it may be appropriate to make narrow exceptions within the identified categories of risk,²³ it is this issue where PG&E and SCE display most clearly that they do not share the presumption that most customers want to pay. Their attitudes toward their customers, who they describe in harsh and demeaning terms, show the need for the Commission to define any exceptions to the general rule carefully and narrowly, to ensure that the exceptions do not expand beyond recognition.

SCE and PG&E's hostile comments and preference for vague statements regarding the applicable definition of fraud show that they must not be allowed to apply their own expansive perspective to this potential exception. For example, PG&E characterizes its customers as attempting to "game the system"²⁴ and wants to require deposits from anyone who has engaged in "demonstrated customer fraud"²⁵ without defining what this would include. If this vague statement were adopted by the Commission, it would leave PG&E with discretion to apply a subjective interpretation of whether a customer is seeking "to game the system." This could easily result in use of the deposit as a mechanism to penalize customers that PG&E deems to be bad actors, rather than a limited mechanism to reduce the risk of write-offs. Similarly, in its comments PG&E dubs customers who write three or more bad checks to be "repeat

²³ The ALJ's Ruling invites comment on customers who have engaged in fraud and delivered bad checks. SCE and PG&E add customers who have filed for bankruptcy (SCE Comments at 7, PG&E Comments at 8-9). The first and second of these categories are discussed below. DisabRA supports NCLC's Reply Comments filed today regarding the application of federal bankruptcy code to customers. The Sempra Settlement Agreement also allows the utilities to collect a reconnection deposit from customers who have committed fraud based on the utilities' tariff rules, customers in bankruptcy consistent with federal bankruptcy code, and voluntary disconnections when disconnection occurred more than two years ago. The Agreement also caps the maximum amount of the deposit and allows for amortization over 3 months. (Settlement Agreement at 7-8). With regard to the issue of returned checks, DisabRA agrees with TURN that the appropriate response may be to require cash payment rather than an additional deposit.

²⁴ PG&E Comments at 8.

²⁵ *Id.*

offenders” who are “typically attempting to circumvent the collection process,” without any explanation as to how it has determined that these customers are ill-intentioned as opposed to simply being unable to pay.²⁶ PG&E fails to acknowledge that customers who do not pay their bills on time may not be bad actors but may instead be struggling financially.

SCE is similarly hostile to its own customers, arguing that “poor, and oftentimes illegal, choices made by a few customers” drive up rates for all customers. SCE’s argument that it is looking out for all ratepayers is unpersuasive. As with PG&E, it should not be allowed to use subjective or broad mechanisms to apply deposit requirements based on “continued fraud or bad check activities.”²⁷ By failing to define “continued fraud,” SCE risks using overly-expansive deposit requirements, and again strays from the goal of this proceeding to assist customers who are facing difficulty paying utility bills. SCE no longer considers a customer to be in good standing and thus requires a reconnection deposit if he or she has two or more returned checks within a 12-month period, two or more insufficient funds transactions within a 12-month period, disconnection for nonpayment, files bankruptcy, or has “involvement in unauthorized energy usage or energy theft.”²⁸ SCE fails to define unauthorized usage or energy theft, again risking unfair application of this standard. Moreover, it does not provide any support for any of its positions, and its bankruptcy proposal seeking to collect a deposit based on simple filing is impermissible.²⁹

²⁶ *Id.*

²⁷ SCE Comments at 7.

²⁸ *Id.* at 8-9.

²⁹ See Reply Comments of the National Consumer Law Center on Phase II Issues Pursuant to ALJ Ruling of August 26, 2010 (“Reply Comments of NCLC”), R.10-02-005, September 24, 2010 at 3-4.

Rather than permit such expansive exceptions, the Commission needs to carefully draft any permissible deposit requirements to minimize their impact and remain true to the initial finding that such deposits are generally impermissible.

V. CONCLUSION

For the foregoing reasons, DisabRA respectfully requests that the utilities refocus, and the Commission act where appropriate, on this proceeding's goal of assisting customers who want to pay their utility bills but are struggling in this time of financial crisis.

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Respectfully submitted,

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