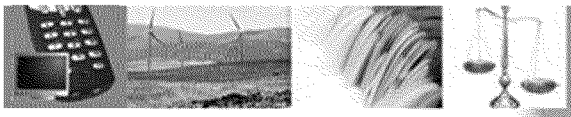
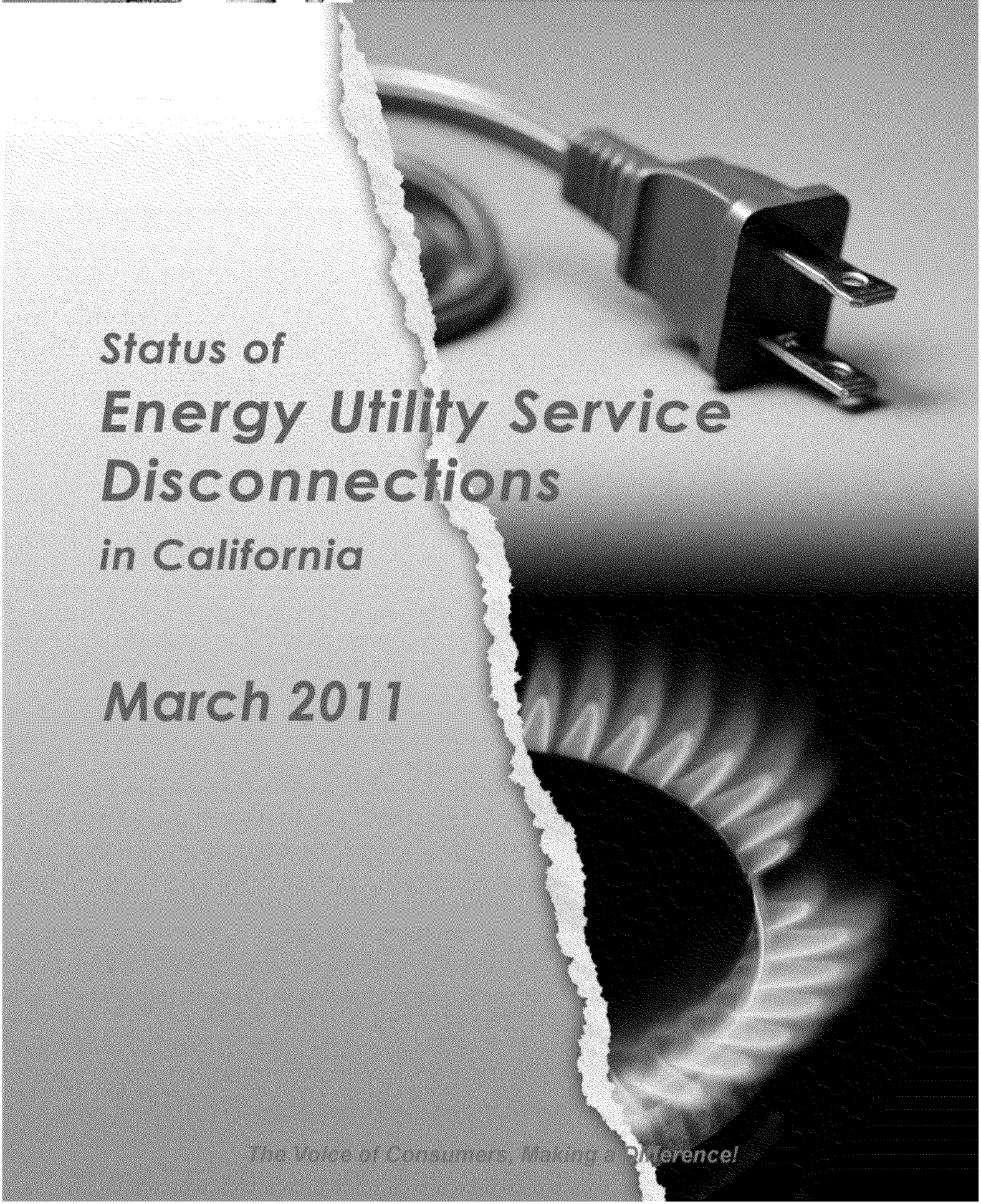


DIVISION OF RATEPAYER ADVOCATES



Status of Energy Utility Service Disconnections in California

March 2011

The Voice of Consumers, Making a Difference!

ABOUT DRA

The Division of Ratepayer Advocates (DRA) is an independent organization housed within the California Public Utilities Commission (CPUC) that represents the customers of California's investor-owned utilities. DRA's statutory mission is to obtain the lowest possible rates for utility service consistent with safe and reliable service levels.

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EXECUTIVE SUMMARY

While California ended 2010 with energy utility service disconnections of residential electric and gas customers at historic lows, the most vulnerable customers still disproportionately face the risk of disconnection. Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SoCalGas) made 586,000 disconnections for non-payment of energy bills in 2010, down from 758,000 in 2009. These numbers represent 5.5 % of low-income customers, compared with only 2.9% of non-low-income customers.

Yet in 2010, $1.8 billion -- a record high amount -- was distributed to low-income customers through California's main energy assistance programs. California's pledge of energy affordability for all households is well established, but it is not being met.

This is the Division of Ratepayer Advocates' (DRA) second report on the *Status of Energy Utility Service Disconnections in California.*[1] Following the first report in November 2009, the California Public Utilities Commission (CPUC) issued new disconnection protection rules that are reflected in the improvements in 2010. Unfortunately, pressure on California's low-income households continues despite lower disconnection rates and high funding for energy assistance.

- Low-income customers with unpaid bills of two months or older total $55 million, double what was owed at the same time one year ago.
- For half of the low-income disconnects, the customer owes less than $315.
- 33,000 disconnected low-income customers did not reconnect service in 2010. Some portion of these permanently disconnected households improvise hazardous methods of lighting or heating their in dwelling.

[1] DRA's first report on the *Status of Energy Utility Service Disconnections in California* was released November 2009 and is available at http://www.dra.ca.gov/NR/rdonlyres/2A0C5457-56FC-4821-8C4D-457F4CF204D1/0/20091119_DRAdisconnectionstatusreport.pdf.

Fewer disconnections alone are not enough to help the most vulnerable customers. Furthermore, these reductions may not be sustainable for PG&E and SCE customers. The CPUC requirement for PG&E and SCE to offer disconnection protections is set to expire at the end of 2011. SDG&E and SoCalGas, through 2013, voluntarily locked-in low disconnection rates for both low-income and non-low-income customers, suspended disconnections during extreme weather, and implemented additional new protections.

DRA believes that a better distribution of assistance funds would make bills more reasonable for more customers. Once bills are better linked to a customer's degree of poverty, the utilities should then offer program features that encourage customers to make regular payments on their energy bills. Specifically, DRA recommends the CPUC take the following steps:

- Modify energy assistance to reflect degrees of poverty and customers' varying energy bill burdens.
- Develop energy assistance program features to help customers manage their utility bill debt, and to make monthly bill amounts stable and predictable.
- Drive disconnections down via benchmarks for low-income disconnections of 5% (PG&E) and 6% (SCE).
- Make a contingency plan for customers chronically without electric and gas service.

INTRODUCTION

In the "Background" section of this report, DRA describes the creation of the CARE (California Alternate Rates for Energy) rate discount program and the program's expansion over the years. DRA summarizes the other major energy assistance programs and funds currently distributed to low-income households in California. This year, DRA broadens the context of the report by incorporating findings from external research on energy poverty and energy program assistance. We rely primarily on Roger Colton's annual Home Energy Affordability Gap[2] (Affordability Gap) analysis to estimate the dollars needed to make energy service affordable to all Californians. The second section of the report, "Progress Made in 2010," presents data showing disconnections are down and payment arrangements are up. This section also describes the consumer protections implemented by the four utilities in 2010. The third section of the report, "Problems Persist," warns that energy costs are still unmanageable for some low-income households. In the "Recommendations" section, DRA encourages the CPUC to explore creative modifications to current assistance programs. DRA also recommends identifying and tracking households that can no longer afford to be utility customers. Finally, in the "Conclusion," DRA reminds readers that the positive conditions of 2010 are unlikely to continue without further intervention, and urges the CPUC to act promptly.

This report utilizes publicly reported customer payment and low-income program data provided by California's largest investor-owned energy utility companies: Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SoCalGas). DRA does not include municipal or small and multi-jurisdictional utilities in its analysis or in this report. DRA supplements the disconnection and payment data from publicly available reports with data provided by the utilities at DRA's request. For purposes of this report, households enrolled in the CARE program are considered low-income customers. All other residential customers are considered non-low-income customers.

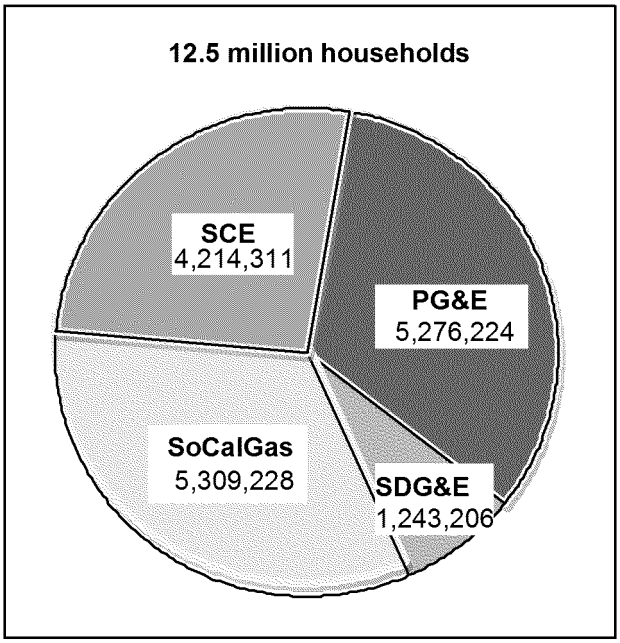
[2] The 2010 Home Energy Affordability Gap, released February 2011, is conducted by Roger Colton of Fisher, Sheehan & Colton. Multiple local, state and the federal agencies have relied upon his studies and evaluations of home energy affordability issues to design and implement programs.

BACKGROUND

California electric and gas customers' service disconnections peaked in 2009, spurring DRA to devote concentrated attention to the problems of utility customers unable to pay their bills. Subsequently in early 2010, the CPUC directed the PG&E, SCE, SDG&E, and SoCalGas to provide relief to utility customers struggling in the bad economy. Beginning February 4, 2010, these utilities were required to waive credit deposits usually triggered by late payments and disconnections. These utilities were also required to extend minimum terms of three months over which customers could pay past-due bills.[3] Additionally, DRA, the CPUC, and the utilities worked collaboratively to secure federal American Resource and Recovery Act matching funds, which doubled the emergency cash grants distributed by the four utilities for energy assistance in 2010.

Ninety-nine percent of all California customers receive either electricity or gas service from PG&E, SCE, SDG&E or SoCalGas.[4] Together, these four utilities serve 12.5 million households. The total customer count of the four utilities presented in Figure 1 is much greater than 12. 5 million, as utility service territories overlap, and some households receive gas service from one utility and electric service from another. In the case of utility service, a customer equals an entire household.

Figure 1: Number of Households Served by Investor-Owned Utilities
Average Customers Served 2010



1. California's Commitment to Energy Affordability

In 1975, California enshrined in state law the importance of energy affordability with the Miller-Warren Lifeline Energy Act: "Light and heat are basic human rights and must be made available to all the people at low cost for basic minimum quantities."[5] Then, California accomplished this goal simply by keeping rates low for basic quantities of energy. In 1989, the CPUC was faced with balancing the need for basic quantities of affordable energy *and* for rates that would encourage conservation. Thus, the CPUC allowed

[3] CPUC Order Instituting Rulemaking (R.) 10-02-005 of February 4, 2010, pp. 1-2, Ordering Paragraph (OP) 3.

[4] Data as of November 30, 2010, found in Attachment A of the *Joint Utilities 2010 CARE Eligibility Estimates* filing of December 30, 2010, in proceeding A.08-05-022 et. al.

[5] Chapter 1010, Stats. 1975, Miller-Warren Energy Lifeline Act, sec. 1(a), cf., Stats. 1982, ch. 1541, section 1(d); also see California Public Utilities Code, Section 739(c)(2).

utilities to raise rates for the lowest amounts of energy usage and also created alternate rates to shield low-income households from the increase.[6] That is how California's primary program to make energy affordable, the rate discount known as CARE, was born.

The CPUC designed the CARE program with simplicity,[7] consistency, and fairness in mind. When establishing the eligibility limit for households, the CPUC copied the telephone assistance program eligibility limit, which was 150% of the Federal Poverty Level in 1989.[8] When establishing the amount of discount, the CPUC settled upon a 15% discount as sufficient to be meaningful to participating customers but within what non-participating customers could bear.[9]

The California Legislature and the CPUC have continued to protect low-income households by expanding the size and scope of the CARE program especially during times of high bills and energy crises. In response to the California energy crisis of 2000, state law prohibited rate increases for all residential usage (including CARE rates) at the two lowest levels of usage.[10] CARE customers were therefore exempted from paying the energy surcharges enacted in 2001 that were necessitated by the crisis.[11] Also in 2001, the CPUC increased the CARE eligibility limit to 175% of the Federal Poverty Level and the rate discount from 15% to 20% of non-CARE residential rates.[12]

To mitigate high gas prices in winter 2005 - 2006, the CPUC increased CARE eligibility to 200% of the Federal Poverty Level and placed a temporary moratorium on CARE disconnections.[13] In the last ten years, the CARE program has grown from reducing the bills of 2.5 million households by $287 million in 2001 to reducing the bills of 4.8 million households by $1.4 billion in 2010.[14]

2. How Much Help Do Households Need?

Continual expansion of the CARE subsidy has very likely prevented many temporary and permanent service disconnections by filling in the gap between what California customers are charged for energy and what they can afford. Nationally, and many states individually, define affordable energy around 6% of a household's annual

[6] Decision (D.) 89-072-062 and D.89-02-027 established LIRA (Low Income Rate Assistance), currently known as CARE, pursuant to Senate Bill 987 amending Public Utilities Code 739, and major expansions in eligibility and benefit amounts.
[7] D.89-09-027, Section II.A.1 (p.7).
[8] D.89-07-062, Finding of Fact 11, Conclusion of Law 1.
[9] D.89-07-062, Finding of Fact 3-8, Conclusion of Law 1 and D.89-09-027 Section II.A.1. 1 "Mr. Florio testified for TURN that bill impacts of up to 3% per month are acceptable for the non-participating customer."
[10] Assembly Bill 1X, enacted in 2001 via PU Code Section 731.1(b)(2), prohibited rate increases for all residential customers up to 130% of baseline usage. The first, or lowest level of residential usage, is known as baseline usage or Tier 1. The next level of usage is known as 100-130% of usage or Tier 2.
[11] The surcharges added to energy bills in response to the 2000 energy crisis were enacted in D. 01-05-064.
[12] D.01-05-033 and D.01-06-010.
[13] D.05-10-044.
[14] Joint Utilities Annual LIEE, CARE, and FERA charts filed February 1, 2011 in A.08-05-022; also see PG&E, SCE, SDG&E and SoCalGas December 2010 monthly CARE reports filed in A.08-05-022; also see PG&E, SCE, SDG&E, and SoCalGas 2001 Annual CARE reports.

income. A multi-state study of energy assistance programs by two of the leading national experts on ratepayer-funded energy assistance programs provides the basis for the 6% figure: assuming 30% of income is reasonable to pay for shelter, and that 1/5 of the shelter cost is assumed to be reasonable to pay for home energy. [15] So 6% is derived from taking 1/5 of 30%.

Affordability Gap

For 2010, the Affordability Gap analysis estimated $2.1 billion ($592/household) as the amount that would be required to resolve the affordability problem in California (i.e., reduce energy costs to 6% of household income) for low-income customers.[16]

California energy assistance programs distributed $1.8 billion in 2010. Of the $1.8 billion, $1.4 billion was distributed through CARE and the remainder through other ratepayer-funded, federally funded, and utility-funded energy bill discount and grant programs. Not all of the assistance programs distributed cash to reduce bills; an important source of savings comes from usage reduction stimulated by the free home energy efficiency retrofits and energy education given through the Low Income Energy Efficiency (LIEE) program[17] and the federal weatherization programs.[18]

Figure 2: Dollars Distributed by Energy Assistance Programs 2010[19]

Programs Funded by	Bill Discounts/ Grants	Energy Efficiency Improvements
Ratepayers	$1,400,146,300	$275,814,410
Federal Agencies	$63,482,461	$77,218,366
Utility Shareholders, Employees and Customer Donations	$3,548,549	
Subtotals	$1,467,177,310	$353,032,776
TOTAL	**$1,820,210,086**	

The main difference between the Affordability Gap estimate and what California actually spends is that the Affordability Gap estimate is based on fewer households than California includes in its programs. The Affordability Gap estimate of $2.1 billion

[15] Multi-Sponsor Study of Ratepayer Funded Low-Income Programs by APPRISE and Fisher, Sheehan, & Colton, *Ratepayer Funded Low-Income Energy Programs: Performance and Possibilities,* July 2007, Executive Summary p. iv at http://www.appriseinc.org/multi_sponsor_study.htm .
Sponsors of the study included AARP, agencies from five states, and results were presented at the National Low Income Energy Consortium.

[16] The amounts estimated to make energy affordable each year change, because the energy costs used in the analysis change, although the estimated population remains the same. Over the years 2006-2010 the estimated amount per household to make energy affordable to low-income Californians ranges from $550 to $765.

[17] The utility-run weatherization and energy efficiency for low-income customers called Low Income Energy Efficiency (LIEE) was enacted in 1987 by PU Codes 2790. The CPUC in 2011 is planning to announce a new name for the program: Energy Savings Assistance Program.

[18] For a comprehensive list of all energy assistance programs in California, including small and multi-jurisdictional utilities, municipal utilities and private programs, see the U.S Department of Health and Human Services LIHEAP clearinghouse website at http://liheap.ncat.org/profiles/California.htm .

[19] This table includes assistance programs for customers at or below 200% of Federal Poverty Level (the state-authorized utility program standard) and assistance programs for customers at or below 75% of the state median income (the federal program standard). For a detailed description of these programs and additional assistance programs available to California customers, see Appendix A.

would be enough meet the needs of 3.5 million low-income households (at 185% Federal Poverty Level or below). California's $1.8 billion in assistance funds was distributed among 4.1 million low-income households (at 200% Federal Poverty Level or below). Because of the different number of households in the estimate and California actual, the most appropriate comparison is dollars per household. The Affordability Gap's estimate of average need per household per year is $592. California's actual average benefit is $375.

Needs Assessment

The CPUC has authorized various California-specific studies expanding on low-income customer needs. KEMA's California Low-Income Needs Assessment[20] (Needs Assessment) began in 1999 and was concluded in 2007. It characterized low-income issues based on a representative sample of 1,500 homes visited and surveyed in late 2003-2004, and attributed these characteristics to the entire low-income population. The Needs Assessment affirms the importance of assessing energy costs as a percentage of energy burden.[21] From its representative sample, KEMA projects that 43% of customers below 200% Federal Poverty Level have an average energy burden of 8.4%, even after receiving the CARE discount.[22] DRA believes that using income and bill data from the whole universe of customers will produce more reliable estimates of need at different poverty levels. Ultimately, the Needs Assessment's main recommendation regarding improving energy affordability is to increase participation in the CARE program.

Impact Evaluation

Another CPUC-authorized periodic evaluation of low-income energy use, conservation behavior, and need sheds light on how California's usage-based pricing may impact low-income customers. The West Hill Impact Evaluation[23] (Impact Evaluation) uses two years of monthly utility bills from 40,000 low-income California households. The study compares bills before and after households received service in 2005 from the LIEE program that provides energy efficiency retrofits. This study supports annual CARE program data showing that households enrolled in CARE use less energy than other residential households. The Impact Evaluation also recommends that "non-energy benefits" accruing to the household from energy efficiency upgrades (such as improved health, comfort, and safety) be taken into greater consideration.[24]

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[20] For utility and other parties' responses to the Needs Assessment, see Comments filed October 16, 2007 and October 26, 2007 in CPUC Rulemaking 07-01-042 available at http://docs.cpuc.ca.gov/published/proceedings/R0701042_doc.htm .

[21] California Public Utilities CPUC, Phase II Low-Income Needs Assessment, Final Report, September 7, 2007, pp. 3-26 and 3-27.

[22] *Ibid.,* p. 5-12. The sample of homes surveyed includes CARE beneficiaries in proportion to the CARE enrollment rate at the time of the survey, so the average energy burden reported already reflects the CARE discount for the majority of customers.

[23] *Impact Evaluation of the 2005 California Low-Income Energy Efficiency Program*, Final Report, West Hill Energy & Computing, Inc., December 19, 2007, revised January 10, 2008.

[24] Usage reduction is an important and well-funded part of California low-income assistance. For purposes of this report we assume that household

3. CARE Program Reaches Nearly All Eligible Customers

California's main energy assistance program, the CARE rate discount, sets an eligibility limit. In the 2010 Affordability Gap's comparison of households below 185% of the Federal Poverty Level, California ranks thirteenth.[25] However, studies on poverty in California explain that the Federal Poverty Level undercounts poverty in California, as the Federal Poverty Level does not account for differences in housing costs.[26] When adjusted for these costs, California's poverty rates would rank third, behind New York and Washington, D.C.[27]

The CPUC's current eligibility limit for customers who need help paying energy bills is all households living at or below 200% of the Federal Poverty Level.[28] In 2010, for a 4-person household, 200% of the Federal Poverty Level equaled an annual income of $44,400 or less.

Over four million households were estimated in 2010 to be living below 200% of the Federal Poverty Level, which is about 34% of all California households.[29] This percentage of households qualifying for CARE has increased about one percent each year over the last few years.[30]

By the end of 2010, for all utilities combined, 29% of all residential households were enrolled in the CARE program. PG&E, SCE, and SoCalGas have all enrolled more than 90% of its eligible customers in CARE. SCE leads the way with 97% of eligible customer enrolled. Together, this is a 15% increase over the previous year. CARE outreach was highly emphasized in 2009 and 2010. The CPUC's opening of the

benefits equal the home retrofit and weatherization benefits equal non-administrative spending on these programs. However, spending does not translate 1:1 to bill reduction. If non-energy benefits are better quantified, then more benefits to the household, in addition to bill reductions, will be accounted for.

[25] The Affordability Gap's ranking is consistent with the overall poverty rankings based on the federal threshold, according to Deborah Reed, *Poverty In California, Moving Beyond The Federal Measure,* Public Policy Institute of California, May 2006.

[26] Additional problems with utilizing one threshold statewide, even if adjusting for California's increased housing costs, is that cost-of-living within California varies enough that an annual income that may be adequate in some of the less metropolitan parts of California is not adequate in San Francisco or Los Angeles. California Budget Project, *Making Ends Meet: How Much Does It Cost To Raise A Family In California?,* June 2010.

[27] *Poverty In California, Moving Beyond The Federal Measure,* Deborah Reed, Public Policy Institute of California, May 2006, p.21.

[28] California also makes provision for customers living at or below 250% of the Federal Poverty Level with a minimum of three people in the household. This program is called the FERA (Family Electric Rate Assistance program. These households are eligible for a smaller discount on higher usage. In 2010, for a 4-person household, 250% of the Federal Poverty Level equaled an annual income of $55,600 or less. FERA customers are negligible for the analysis presented in this report; only 0.1% of residential customers are on FERA.

[29] The utilities annually contract with Athens Research to estimate the number of households at different poverty levels to make sure utility assistance programs are reaching as many of these households as possible. The 5.2 million estimate double-counts some households served by more than one utility. When eliminating the double-counting, the estimate is 4.1 million. Attachment A of the Joint Utilities 2010 CARE Eligibility Estimates filing of December 30, 2010 filed in A.08-05-022 et al.

[30] The CPUC requires utilities to estimate annually on October 15 the number of low-income households in their service territory for that year. As the current year estimate is not available until the year is nearly over, utilities utilize the prior year estimate to report progress in enrolling customers in the low-income program. Therefore, eligible population estimates generally lag by one year.

disconnection proceeding likely contributed to great efforts to enroll all eligible customers in CARE.[31]

CARE

What does CARE actually provide? The CARE program discount is uncapped, so it can serve all qualifying customers with no limit on how many customers enroll. The benefit reduces bills by a minimum of 20%, but this increases as customers use progressively more energy during the month. For customers that use the most energy, the benefit can be in excess of 50% of the bill. The 20% discount is applied to residential rates for basic amounts of usage (called Tier 1) and for the next blocks of usage above basic (called Tiers 2 and 3). Usage at the higher levels (Tiers 4 and 5) is billed to CARE customers at Tier 3 rates. Because the CARE discount is tied to California's tiered rate structure, the practical effect is that the highest usage households receive the greatest CARE discount. Besides the obvious that single person households use less energy, the Impact Evaluation identifies other types of households that use less energy (and therefore receive a smaller discount): renters, those in multi-family dwellings, and those with incomes at the lowest end of the income scale.[32]

Figure 3: CARE Assistance Funds Distributed 2010

	All	PG&E	SCE	SDG&E	SoCalGas
Overall (in millions)	$1,400 mil	$824 mil	$353 mil	$86 mil	$135 mil
Per Household, Per Year	$286	$550	$256	$294	$79

[31] Comments of PG&E, SCE, SDG&E, and SoCalGas in R.10-02-005 assert the importance of increasing CARE enrollment as a strategy to reduce disconnections.

[32] Impact Evaluation of the 2005 California Low-Income Energy Efficiency Program, Final Report, West Hill Energy & Computing, Inc., December 19, 2007, revised January 10, 2008, Section 4.5, pp. 40-43.

PROGRESS MADE IN 2010

Disconnections of all residential customers dropped to historic lows in 2010. Despite PG&E's implementation of remote disconnection via Smart Meters, PG&E's disconnection rates decreased. In November and December 2010, 90% of PG&E residential disconnects were done remotely. Finally, customer assistance arrangements are at all time highs, showing that utilities are more accommodating of customer requests to pay debt over time.

1. Disconnections at Historic Lows; Non-Low-Income Customers Benefit More

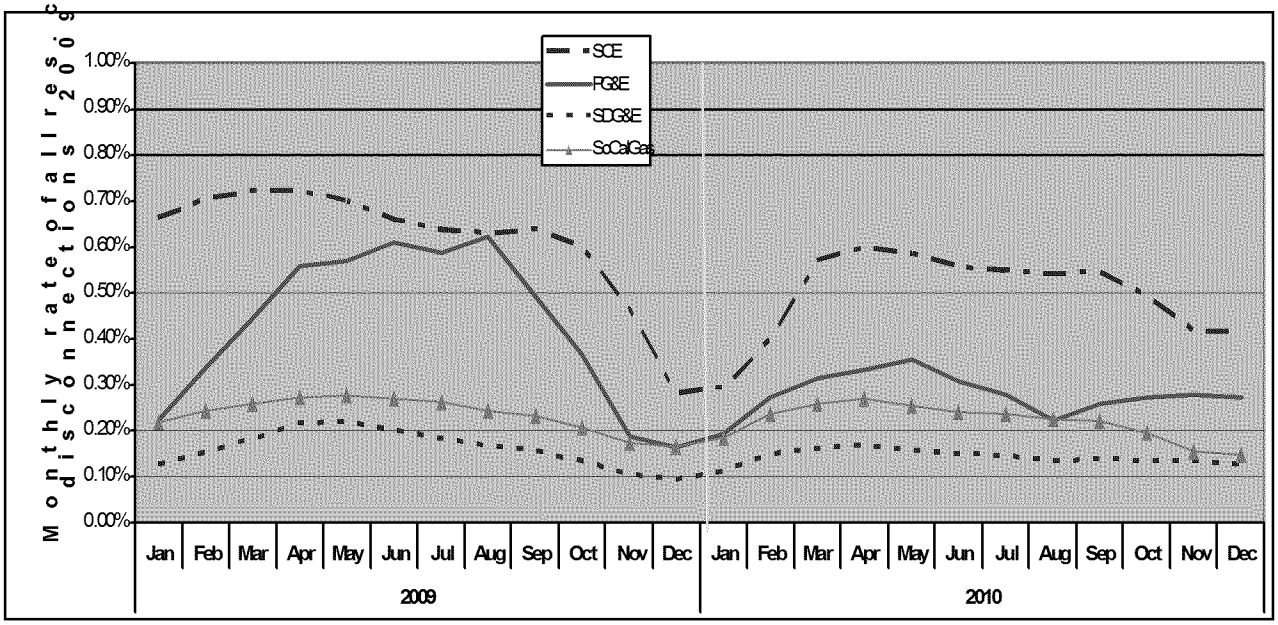
Residential disconnection rates in 2010 were at an all-time low for the four utilities, although disconnection rates still vary among them.

Figure 4: Residential Disconnections Rates 2007-2010

	All	PGE	SCE	SDG&E	SoCalGas
2007	4.54%	4.00%	7.28%	2.13%	3.45%
2008	4.92%	4.40%	7.89%	2.10%	3.75%
2009	4.75%	5.15%	7.50%	1.92%	2.81%
2010	3.65%	3.39%	5.83%	1.70%	2.63%

Figure 5 shows that PG&E made the most significant improvement in 2010, reversing its 2009 trend of rising disconnections. Although SCE's disconnection rate has dropped overall in 2010, part of the improvement can be attributed to SCE's suspension of disconnections in January 2010. In the following months of March-December 2010, SCE shows improvement over 2009, but not enough to bring it in line with the other utilities.

Figure 5: Residential Disconnection Rates by Utility 2009-2010, Monthly Basis



SDG&E's disconnection rate in 2010 slightly declined from its already low 2009 rate. Similarly, SoCalGas's 2010 disconnections are consistent with its already low 2009 rate.

Non-low-income disconnections dropped slightly more than low-income customers from 2009 to 2010.

Figure 6: Decrease in Disconnections, Low-income vs. Non-low-income, 2009-2010[33]

	PGE	SCE	SDG&E	SoCalGas
Low-income	-34%	-18%	-11%	-3%
Non-low-income	-38%	-27%	-16%	-12%

2. Customers Protected Only Through 2011

2011 has solid protections in place for customers. PG&E and SCE are governed by the CPUC's July 2010 Disconnection Decision.[34] This decision extended the CPUC's February 2010 rules to waive credit deposits and extend longer terms for re-payment of bills. SDG&E and SoCalGas also implemented these rules in 2010. However, beginning in 2011, SDG&E and SoCalGas are governed instead by a settlement agreement entered into with consumer advocacy groups,[35] including DRA, and approved by the CPUC.[36] The central feature of the settlement agreement are disconnection benchmarks (#3 in Figure 7). SDG&E agreed to keep its residential disconnection rate below about 2% of customers annually, and SoCalGas agreed to keep its disconnection rate below 3.3% annually. In the event SDG&E or SoCalGas disconnection rates exceed the benchmark, the utility will then return to implementing credit deposit waivers and offer mandatory 3 month terms of payment plans. The settlement agreement also provides that disconnects will be suspended during temperature highs and lows (#4 in Figure 7). SDG&E and SoCalGas agreed to suspend disconnections when the temperature in a household's area is 32 degrees or below, or 100 degrees or higher. Among additional protections, SDG&E agreed to a one-year delay in implementing the remote disconnection

Figure 7: Disconnection Protections in Effect 2011, by Utility

	1. Credit Deposit Waivers	2. Mandatory Offer of 3 Month Payment Plan	3.Disconnection Benchmark (Limit)	4. Disconnects Suspended During Temperature Highs/Lows	5. Remote Disconnection Delay & Protections
PG&E	•	•	No provision	No provision	No provision
SCE	•	•	No provision	No provision	No provision
SDG&E	If above benchmark	If above benchmark	•	•	•
SoCalGas	If above benchmark	If above benchmark	•	•	•

[33] These decreases are adjusted to account for changes in the low-income and non-low-income populations.

[34] CPUC Decision 10-07-048.

[35] Settling Parties are SDG&E, SoCalGas, DRA, The Utility Reform Network (TURN), Greenlining, Disability Rights Advocates, and The National Consumer Law Center (NCLC).

[36] Settlement adopted by CPUC in D.10-12-051.

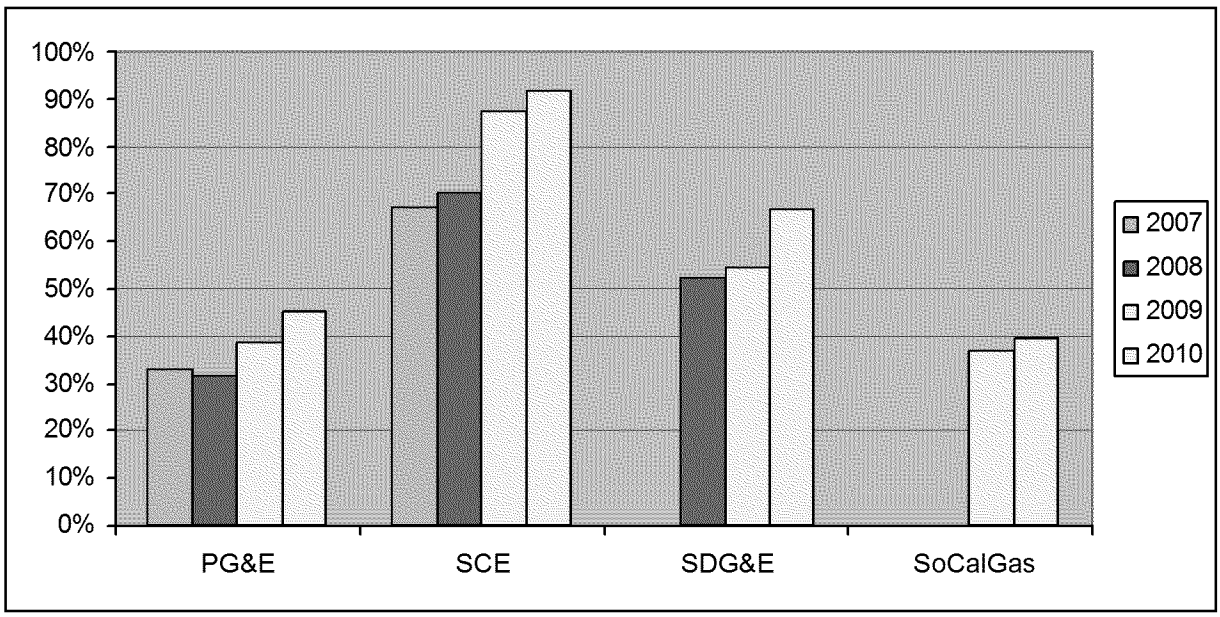
function after installation of the new advanced technology meter (also known as "Smart Meters"). SDG&E further agreed not to remotely disconnect its elderly, disabled, and medically vulnerable customers (#5 in Figure 7).

The CPUC's rules applicable to PG&E and SCE will expire at the end of 2011, while the protections of the settlement agreement, governing SDG&E and SoCalGas, will remain in effect until 2014.

3. More Payment Arrangements Offered in 2011

All four utilities offer households extra time to pay their utility bill either before or after missing the due date, and often up until the moment of disconnection. Utilities typically offer one-time payment extensions or amortization agreements to pay off debt regularly with installment payments. As long as a household has formalized an arrangement with the utility to pay past-due bills over time, the utility is not allowed to disconnect the household.[37] If a household fails to make one of the agreed upon payments, the default immediately triggers a 48-hour notice regardless if the household's other bills are current. As noted above, longer payment terms was one of the two policy changes implemented in 2010. The increases in payment arrangement initiated, shown in Figure 8, can be partially attributed to the CPUC's new rules in 2010, requiring the utilities to actively promote payment arrangements.

Figure 8: Total Residential Payment Arrangements 2007-2010, Annual Basis



[37] California Public Utilities Code sections 779(b)(2-3) and (e), and 779.1 (f).

Among the four utilities, SDG&E shows the most significant increase in payment arrangements granted, beginning in the early months of 2010 and continuing to rise steadily. Both relative to customers facing a threat of disconnection, and as a percentage of all customers, SDG&E arranged steadily more payment arrangements throughout 2010.

PG&E's payment arrangements increased most significantly during the first six months of 2010. PG&E has simultaneously taken pressure off its customers by changing the past-due bill amounts triggering a 48-hour disconnect notice from $50 to $150. SCE's increase in payment arrangements started earlier than PG&E and SDG&E, in the winter of 2009-2010, and since spring 2010 the number of arrangements is close to what it was in earlier years (although arrangements for low-income customers remain higher). SoCalGas's number of payment arrangements is consistent with the prior year, and relative to 48-hour notices, is decreasing.

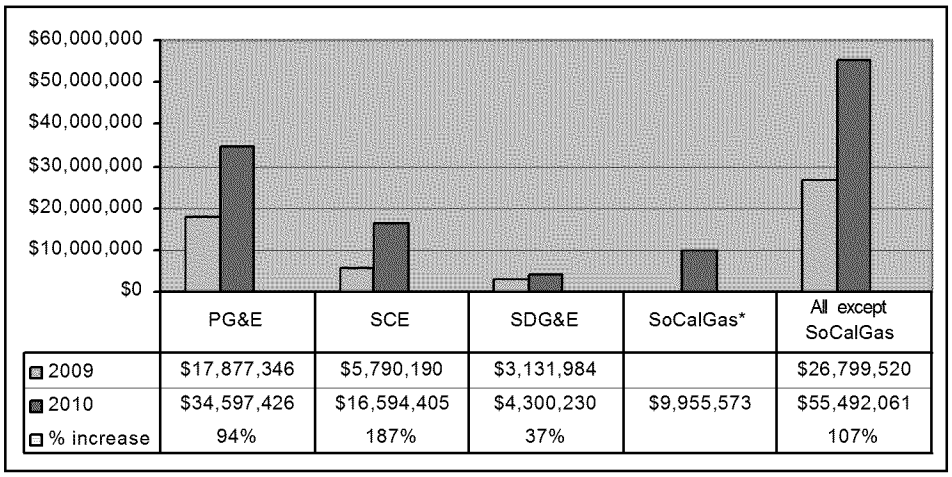
PROBLEMS PERSIST

1. Deferred Payments Loom

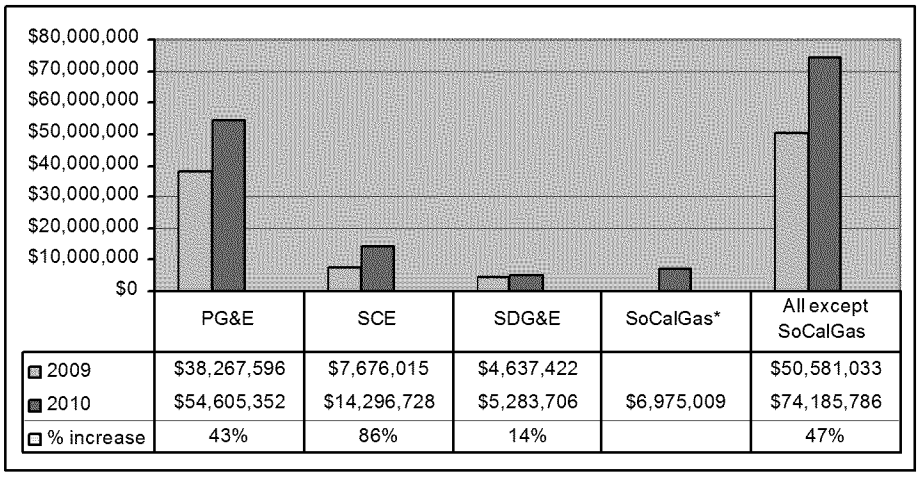
Among the four utilities, past-due payments started to accumulate in mid-2010, and payment data in 2011 shows debt continues a slow but steady rise. At some point in time, this increased debt could cause disconnects to rise again, unless the utilities and the CPUC implement strategies that help customers manage and pay down their past-due balances.

The most recent data showing dollars in debt is from September 2010.[38] Together for PG&E, SCE, and SDG&E,[39] all residential past-due amounts over 60 days old are $130 million, 68% higher than September 2009. For just low-income households, past-due amounts over 60 days old are 107% higher, at $55 million.

Figure 9: Low-income Customer Unpaid Amounts Over 60 Days Old, September



	PG&E	SCE	SDG&E	SoCalGas*	All except SoCalGas
2009	$17,877,346	$5,790,190	$3,131,984		$26,799,520
2010	$34,597,426	$16,594,405	$4,300,230	$9,955,573	$55,492,061
% increase	94%	187%	37%		107%



	PG&E	SCE	SDG&E	SoCalGas*	All except SoCalGas
2009	$38,267,596	$7,676,015	$4,637,422		$50,581,033
2010	$54,605,352	$14,296,728	$5,283,706	$6,975,009	$74,185,786
% increase	43%	86%	14%		47%

Figure 10: Non-low-income Customer Unpaid Amounts Over 60 Days Old, September

[38] / * Utilities delay reporting of the dollars in arrears until after they make their quarterly 10K filings to the Securities and Exchange CPUC. Monthly dollars in arrears data for October, November, and December 2010 will be provided in the utilities' March disconnection reports.

[39] SoCalGas did not begin providing past-due data until October 2009; therefore, no comparison is yet publicly available.

Most utilities did not report past-due amounts prior to 2009. Therefore DRA cannot present historical data of outstanding billed amounts. The increase of customer debt shown in Figures 9 and 10 is a comparison of outstanding debt as of September in the years 2009 and 2010. September 2010 is the most recent data available to the CPUC, as utilities delay for several months the release of data on dollars in arrears. Of course, past-due balances over 60 days old are from accounts that started to default several months earlier, so this data reflects unpaid bills from approximately the first six months of 2010.[40]

The utilities also report monthly the number of accounts paying 100%, 50-99%, and less than 50% of bills. This payment amount data shows more recent payment behavior, from December 2010. Fewer accounts in December 2010 paid 100% of bills than one year ago, and more accounts paid less than 50% of their bills.

2. Large Portion of Low-income Customers Risk Disconnection Regularly

California state law requires all utilities to provide to households that are in default on their bills a written notice or personal contact at least 48 hours prior to disconnection.[41] Each utility sets a threshold amount that a customer must owe before adding the household to the disconnection list. The thresholds are currently:

PG&E	$100
SCE	$25
SDG&E	$250
SoCalGas	$60

Only a fraction of customers who receive disconnection notices are disconnected. For example, one month about 5% of all customers received disconnect notices, 1.5% still had not paid by the time the notice expired, and less than 0.5% (76,000) of all customers were ultimately disconnected that month.[42] However, receiving the notice means a household is at risk for disconnection. The term for this is energy insecurity.

Energy Insecurity

Over one-third of PG&E and nearly one-half of SCE low-income customers can be considered energy insecure. These low-income customers receive three or four 48-hour notices of disconnection on average each year.[43] Many fewer SDG&E

[40] Dollars and accounts in arrears are key indicators because they could warn of an upcoming wave of disconnections. However, because this data is limited, and increases are likely caused in part by the CPUC's new policies, DRA cannot give a conclusive interpretation. The CPUC's new policy in 2010 of mandatory minimum terms for payment arrangements will mean more accounts will show an increase in unpaid bills, but these unpaid amounts could be part of an ongoing payment arrangement. The data reported to the CPUC does not segregate past-due accounts that are in a payment arrangement (therefore preventing collection actions) from past-due accounts with no payment arrangements.

[41] California Public Utilities Code section 779.1 (b).

[42] Data from September 2009.

[43] Another statewide characterization can be found in the KEMA Low-Income Needs Assessment (2007), which deems 66% of all low-income households energy insecure (p.5-22). The Needs Assessment also states that 22% of its 1,500 low-income homes surveyed had been threatened with disconnection and 5% had been disconnected (p.5-17).

and SoCalGas low-income households receive 48-hour notices during the year. For those that do, SDG&E customers receive on average three notices and SoCalGas customers receive on average two notices each.[44]

3. Low-Income Disconnection Disparity Worsens

Low-income customer disconnects are significantly more frequent than non-low-income customer disconnects, equating to 5.5% of low-income customers annually but only 2.9% of on-low-income customers. The data presented in Figures 11 and 12 indicate that this disparity is getting worse over time.

Figure 11: Four Utilities, Low-income Disconnection Rate vs. Non-low-income Disconnection Rate July 2008 – July 2010, Monthly (9 Month Rolling Average)

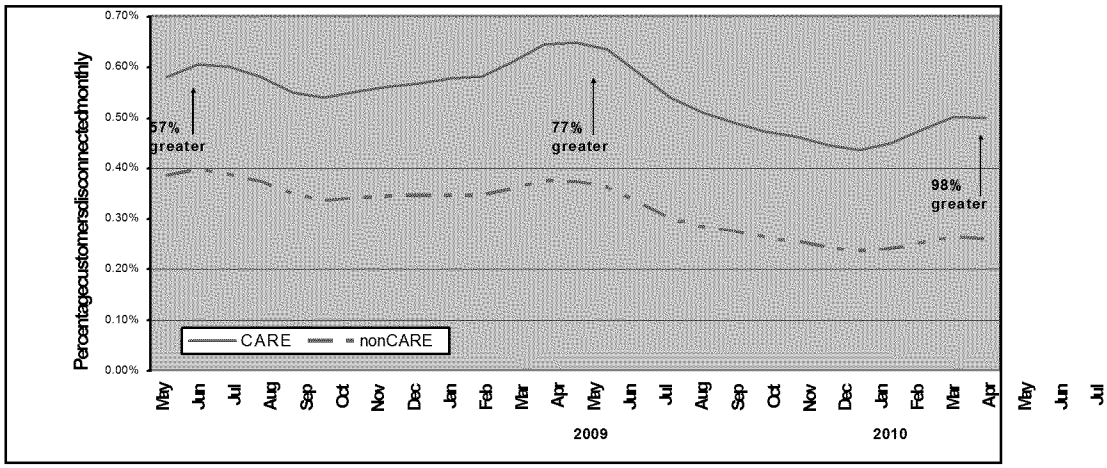
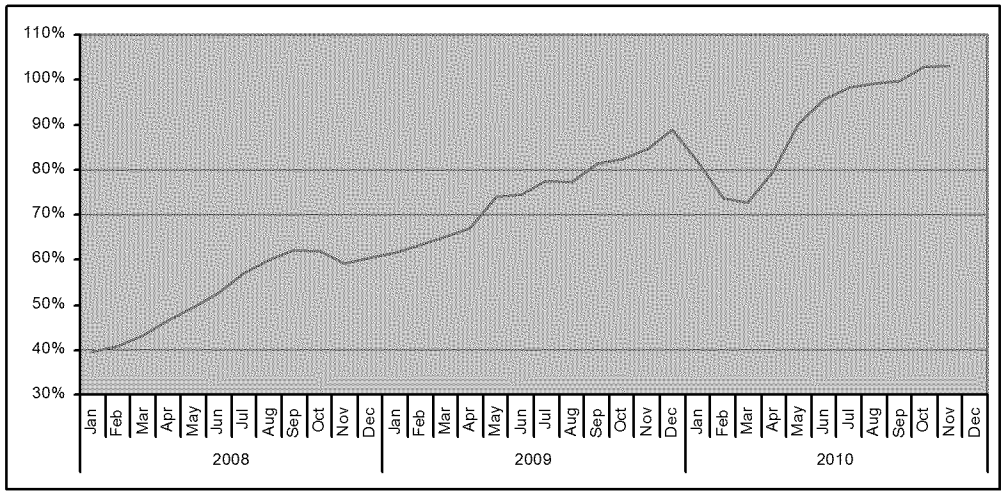


Figure 12: Four Utilities, Percentage Greater Low-income Disconnection Rate than Non-low-income Disconnection Rate, 2008-2010, Monthly Basis



[44] Because of the way the data is collected and reported, this data assumes that the customer's CARE status remains the same for the entire calendar year and the following month in which the data is run. Although this is not actually the case, because some customers will either enroll in or leave CARE during the year, the mismatches do not invalidate the analysis. DRA determines that the analysis is valid by comparing the "all residential" rates to the rates separated by "CARE/all except CARE," and by comparing this "account level" data to the "all occurrences" data. See Appendix C for further explanation.

Until relatively recently, utilities may not have monitored customer disconnections by income, and therefore may not have been aware of this trend. However, this trend is now impossible to ignore and utilities must address this troubling outcome. Even though the CPUC's disconnection protection rules helped all customers in 2010, non-low-income customers were helped more, causing the gap in disconnection rates to widen. The disparity is further evidence that affordability must be addressed in order to manage disconnection rates, and that the CPUC's current disconnection protection rules alone are not sufficient. the last few months alone, fatal accidents occurred in households where service had been disconnected and unsafe alternatives were used for heating and lighting.

Half of the low-income customers who are disconnected owe less than $315. Losing access to gas and electric service is a grave consequence for debt of this amount. Utilities reported the amounts owed by households at the time of disconnection, for a sampling of months in 2010. By utility, half of the disconnected low-income customers owed less than:

PG&E	$315
SCE	$226
SDG&E	$152
SoCalGas	$100

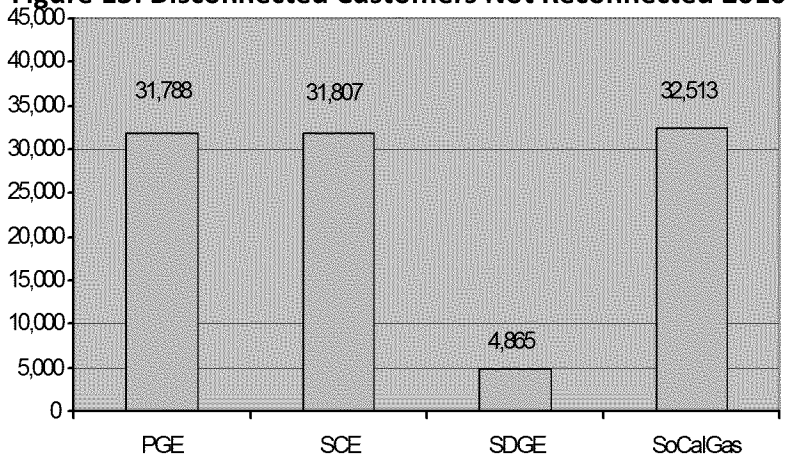
- January 2011: 4 die in Oakhurst using gas generator to heat home[45]
- January 2011: 2 die in Willowbrook using their oven to heat their home[46]
- December 2010: 4 die in Oakland fire caused by extension cords run from neighboring dwelling[47]

4. Dwellings Chronically Without Service Pose Great Safety Risk

Not all disconnected customers are reconnected. Some portions of these customers live without electricity or natural gas because they cannot afford to reconnect service. These customers need extensive help to get access to electricity and gas. The utilities have the ability distinguish to between customers who cannot afford to reconnect and customers who have moved or no longer require service.

Households may not initiate service if they cannot afford it, or if they cannot amass the deposit to start service. Given that energy affordability is a high priority, California needs an accurate count of how many dwellings are in this situation. In

Figure 13: Disconnected Customers Not Reconnected 2010



[45] http://www.fresnobee.com/2011/01/17/2236465/blocked-vent-led-to-4-oakhurst.html# downloaded January 20, 2011.

[46] http://www.fdnntv.com/2-Women-Willowbrook-Fatally-Poisoned-Carbon-Monoxide downloaded February 9, 2011.

[47] http://articles.sfgate.com/2010-12-31/news/26352717_1_downstairs-apartment-upstairs-unit-apartment-building downloaded January 1, 2011.

RECOMMENDATIONS

The CPUC's new rules in the 2010 Disconnection Decision, and the utilities' aggressive implementation of the new rules, mitigated the effects of the California recession. Waiving credit deposits and extending the terms of payment plans relieved low-income, payment-troubled households from the final consequence of credit and collections actions: disconnections. These protective credit and collections policies do not include a mechanism to resolve the unpaid utility debt that is accumulating for those for whom energy is unaffordable. However, the CPUC has two proceedings scheduled for 2011 to more precisely address the affordability problem.

1. Make Improvements via Two CPUC Proceedings Open in 2011

Every three years, the CPUC reviews and re-authorizes utility plans for low-income energy assistance in California.[48] The utilities are the program administrators of CARE and LIEE. As program administrations, the utilities present program plans to the CPUC for public review and input. This year, the program plans for 2012-2014 will be presented in utility applications to be filed with the CPUC by May 15, 2011. The CPUC typically takes four to six months to review and consider input.

The CPUC's disconnection proceeding remains open but has stalled with several issues still pending.[49] Consumer groups including DRA are advocating that the CPUC require the utilities to allow payment-troubled customers to choose their billing date, in order to better align timing of paychecks with utility bills. DRA's benchmark recommendation (#5 below) for PG&E and SCE is also slated for consideration in this proceeding.

2. Assess Energy Costs as a Percentage of Income

DRA's first recommendation is to target the assistance dollars to better reach those customers for whom, even with the CARE discount, energy is still unaffordable. Those targeted are likely to be many of the disconnected CARE customers. The CPUC could potentially achieve a great impact by more carefully targeting the same subsidy amount rather than increasing the total amount. Rather than its current one-size-fits-all discount, the CARE program should start to reflect the varying degrees of poverty among CARE customers. The *Needs Assessment* speculated that the CARE program had "enrolled a significantly larger share of households in the lowest energy burden category," and concluded "In the end, this might not be the best strategy for meeting needs and providing maximum benefits."[50] Several states, including Illinois, New Jersey, Ohio, and New Hampshire distribute

[48] Applications 08-05-022 (PG&E); 08-05-024 (SoCalGas); 08-05-025 (SDG&E); 08-05-026 (SCE).

[49] Rulemaking 10-02-005, Phase II *Administrative Law Judge's Ruling Providing Opportunity For Comments And Addressing Other Phase II Issues,* August 26, 2010.

[50] Needs Assessment, pp. 7-8 and 7-9.

energy assistance dollars as a percentage of household income.[51]

3. Develop New Features of Energy Assistance

The first step is making a household's energy bill a reasonable portion of the household income. Then, improving the payment behavior of the household becomes possible. Together, these two steps should produce desirable outcomes for all parties. The low-income household retains access to an essential service, the utility records less bad debt, and less bad debt flows into the calculation of all customers' rates.

Studies With California Examples

In addition to the studies identified in the Background section in this report, DRA reviewed a wealth of research available from other states and the federal energy assistance program to identify potential changes to CARE.[52] Two studies include California programs: the multi-state sponsored study *Ratepayer Funded Low-Income Energy Programs Performance and Possibilities Final Report*[53] and *PacifiCorp's Low-Income Arrearage Study*.[54]

Based on DRA's review of the research, features of energy assistance programs likely to improve customer payment behavior are:

- Programs that keep monthly bill payments level
- Addressing past-due burdens as well as current bill amounts (known as arrearage management)

Making bills predictable has been shown to improve customer payment patterns.[55] Utility credit and collection departments offer a program that keeps monthly payments level, known as "balanced payment" or "level pay" plans. However, the utilities' current rules make this program largely unavailable to payment troubled households because all past-due amounts must be paid in order to enroll in this program. If the utilities' program assistance departments were to work together with the credit and collections departments, they may be able to design program rules that solicit the participation of the payment-troubled customers who most need such a program.

Arrearage Management

This leads to the subject of arrearage management programs. TURN (The Utility Reform Network) filed a Petition asking the CPUC to consider arrearage management in June 2009,[56] but the

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[51] For Ohio, see http://development.ohio.gov/community/ocs/EnergyHelp.htm ;
For Illinois, see http://liheap.ncat.org/dereg/states/illinois.htm .

[52] See Appendix B for list of program assistance evaluations from which recommendations are derived.

[53] Apprise and Roger Colton, *Ratepayer Funded Low-Income Energy Programs Performance and Possibilities Final Report*, July 2007 at http://www.appriseinc.org/multi_sponsor_study.htm .

[54] *Low-Income Arrearage Study* prepared for PacifiCorp March 20, 2007 by M. Sami Khawaja, Kevin Monte de Ramos, Anne West, Doug Bruchs, Quantec LLC, in association with Roger Colton.

[55] Apprise and Roger Colton, *Ratepayer Funded Low-Income Energy Programs Performance and Possibilities Final Report*, July 2007, Executive Summary, xiii.

[56] See June 16, 2009 *Petition* 09-06-22 *of The Utility Reform Network to Adopt, Amend or Repeal*

CPUC declined to do so. However, the research from other states makes the case that help with managing past-due bills is a critical feature of assistance programs. The proposals raised in the TURN Petition, with its extensive list of other states' experience with arrearage management, is an excellent starting point for CARE program administrators.

DRA also recommends smaller adjustments to the CARE program or for CARE customers, such as adjusting bill due dates to coincide with paychecks. This particular recommendation is currently pending before the CPUC, and the CPUC should adopt this low cost option.[57]

The CPUC has a perfect example of testing a creative new feature of CARE. The CPUC's Consumer Services and Information Division, and the utilities, launched CHANGES (Consumer Help and Awareness with Natural Gas and Electricity Services) in January 2011.[58] Using CARE funding, CHANGES adds a "case management" approach to energy assistance, providing comprehensive bill counseling and help for limited and non-English speaking customers. Several multiple language–speaking, community-based organizations statewide will be paid to assist these customers to better understand their energy bills, access the bill discount and home retrofit benefits, and advocate for the customer if needed. The utilities should report the difference in disconnection rates for these customers before and after they participate in CHANGES, and show if these customers ultimately have fewer disconnections after such assistance.

4. Identify and Consider Those Chronically Without Service

This recommendation captures those whose energy poverty is too great for CARE to fix. We recommend utilities simply report the location of these households annually to appropriate social welfare agencies. New York,[59] Pennsylvania,[60] and Ohio[61] are among the states with this simple requirement. Although these are cold-weather states, living without utility service is hazardous regardless.

Additionally, DRA recommends a count of these households be included for the CPUC's consideration of the CARE and LIEE programs for 2012-2014. Furthermore, utility customers who move frequently need to be specially considered next time around. Transient low-income households have generally been excluded from studies such as the Needs Assessment and Impact Evaluation because these studies rely on before and after comparisons to determine changes from the programs. Transient households by definition are

Regulation Pursuant To Pub. Utilities Code Section 1708.5 Related To Arrearage Management And Shutoff Prevention For Residential Customers Of The Major Jurisdictional Electric And Gas Utilities.

[57] See CPUC Ruling Implementing Phase II of Rulemaking 10-02-005, and all parties' Comments filed September 15, 2010; all parties' Reply Comments filed September 24, 2010.

[58] CPUC Resolution CSID-004 approved November 19, 2010.

[59] *See* New York NYCRR16 Part 11: Home Energy Fair Practices Act And Energy Consumer Protection Act -- Rules http://www3.dps.state.ny.us/N/nycrr16.nsf/Parts/6CAA329B4A1945F485256FC7004CFBA3?OpenDocument .

[60] See 52 Pennsylvania Code § 56.100.

[61] See Ohio Revised Code 4933.123.

not in the same location long enough to be included in before and after comparisons. Some of the most vulnerable households, since they can no longer afford to be utility customers or because they move frequently, become invisible when energy affordability analysis relies upon utility customer data. Because California is serious about energy affordability, as demonstrated by word and deed, the CPUC has an obligation to understand the depth of energy poverty in California.

5. Benchmark Low-Income Disconnections

Finally, DRA recommends the CPUC set benchmarks for PG&E and SCE disconnection of its low-income customers. SDG&E and SoCalGas already voluntarily put benchmarks in effect through 2013. SDG&E's all residential benchmark is 2.08%. Its low-income benchmark is 3.44%. SoCalGas' all residential benchmark is 3.36%. Its low-income benchmark is 4.32%. DRA recommends the following additional limits on low-income disconnections: [62]

PG&E: 5% or fewer low-income customers disconnected annually

SCE: 6% or fewer low-income customers disconnected annually

Benchmarks motivate cooperation between utilities' credit and collections departments and low-income assistance departments. DRA is particularly encouraged by the success of the CARE goal the CPUC set for utilities in its 2008 decision authorizing the program. With no penalties or incentives (other than positive public relations), three of the four utilities (all except SDG&E) have exceeded the CARE program penetration goal of 90%.

[62] DRA's recommended low-income benchmarks are based partially on PG&E's and SCE's overall historical disconnection rates, in order to accommodate differences in geography, demographics, and electricity and/or gas. For PG&E, DRA has determined that its current overall disconnection rate is acceptable and designed the benchmark to keep rates at this level. For SCE, DRA believes disconnection rates still exceed acceptable levels and designed the benchmark to continue to drive down rates. DRA then calculated a low-income disconnection rate no greater than one-and-a-half times a reasonable non-low-income rate. Though DRA's recommended benchmark still does not achieve equal low-income and non-low-income rates, it would move rates closer to the desired goal at a pace that allows utilities to make the necessary adjustments to their collections processes.

CONCLUSION

Another positive outcome of the CPUC's 2010 Disconnection Decision is its requirement for the utilities to regularly report disconnection data. DRA urges the CPUC to use this data to track how low-income disconnection rates change relative to disconnection rates of the rest of residential customers. DRA believes that the difference in disconnection rates between low-income and non-low-income customer groups represents the volume of disconnections due to unaffordability. "An effective EA [Energy Assistance], or a portfolio of EA actions, should provide adequate funding to cover all customers applying for assistance that would allow them to stay on the utility system."[63] By using the non-low-income disconnection rate as a guide, the CPUC can gauge when California has accomplished the goal of making electric and gas service accessible and affordable for all California households.

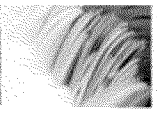
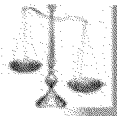
The disconnection outlook for 2011 is positive because utility and regulatory consumer protections are in place, but only for 2011. The disconnection protections required by the CPUC for PG&E and SCE customers will expire at the end of this year. The utilities are preparing to put into effect new, higher rates.[64] The overall distribution of energy assistance through the CARE discount will likely be less overall, as CARE rates begin increasing annually for the first time since 2001. Rates will increase even further as the cost of carbon emission reductions hit customers' bills and customers face variable pricing structures designed to drive conservation and reduce carbon emissions.

Low-income utility customers will be least equipped to absorb these costs and risks. The CPUC must pre-emptively call for creative program approaches to energy assistance. DRA's recommendations outlined in this report will go a long way in addressing many of the underlying issues that lead to energy service disconnection. California must be extra vigilant to make sure energy becomes more, not less, affordable.

[63] Ken Costello, *How To Determine The Effectiveness of Energy Assistance Programs, And Why It's Important,* National Regulatory Research Institute, December 2009, p. 22.

[64] SCE Application (A.) 10-11-015, SDG&E A. 10-12-005, and SoCalGas A. 10-12-006 have requested the CPUC authorize new rates for implementation in 2012. The CPUC authorized higher rates for PG&E in 2010 (Application 10-03-014) and implementation of these new rates is pending for 2011.

INDEX OF FIGURES AND TABLES

DIVISION OF RATEPAYER ADVOCATES

Appendices

Status of Energy Utility Service Disconnections in California

March 2011

The Voice of Consumers, Making a Difference!

APPENDIX A: RESIDENTIAL ENERGY ASSISTANCE PROGRAMS

Residential Energy Assistance Programs in California

Program	Description	Available To:
Bill Discounts and Grants:		
California Alternative Rates for Energy (CARE)	20% discount on energy rates for lowest usage, >20% discount on energy rates for higher usage	Low-income households at or below 200% Federal Poverty Level
Family Electric Rate Assistance (FERA)	Rate discount for increased usage	Large lower-middle income households at 200-250% Federal Poverty Level
U.S. Department of Health & Human Service: Low Income Home Energy Assistance Program (LIHEAP)	Partial bill payment, crisis grants to avoid disconnection	Low-income households at or below 75% State Median Income
PG&E's Relief for Energy Assistance through Community Help (REACH), SDG&E's Neighbor-to-Neighbor, SoCalGas' Gas Assistance Fund (GAF), SCE's Energy Assistance Fund (EAF)	Crisis grants to avoid disconnection	Households demonstrating extreme hardship, in some cases restricted to low-income households, criteria varies
Medical Baseline	Charges higher energy usage at the lowest possible rate to accommodate medical equipment that relies upon electricity	Customers on life-support or with special medical needs
Usage Reduction:		
California's Low-Income Energy Efficiency (LIEE)	Free energy efficiency home retrofit	Low-income households
U.S. Department of Energy: Weatherization Assistance Program (WAP)	Free energy efficiency home retrofit	Low-income households
Energy Efficiency and conservation programs	Variety of programs: Appliance rebates, home energy surveys.	All
Demand Response programs	Payments to turn off air conditioning during rare periods of peak demand	Households with air conditioning
Payment Management:		
Payment Extensions and Installment Plans	Extensions of time to pay deposits and bills	All
Level Pay/Balanced Pay	Bill is the same amount each month	All
Third Party Notification	Customer can designate an additional person to receive past-due and disconnection notices	All

APPENDIX B: RESEARCH ON LOW-INCOME PROGRAM ASSISTANCE IMPACTS

Poverty

California Budget Project, *Making Ends Meet: How Much Does It Cost To Raise A Family In California?*, June 2010.

California Budget Project, *A Generation Of Widening Inequality, The State of Working California 1976-2006,* August 2007

Deborah Reed, *Poverty In California, Moving Beyond The Federal Measure,* Public Policy Institute of California, May 2006.

California: Low-Income Energy Costs, Needs, Assistance Programs

APPRISE and Roger Colton, *Ratepayer Funded Low-Income Energy Programs Performance and Possibilities Final Report,* July 2007.

Roger Colton, Home Energy Affordability Gap, Fisher, Sheehan & Colton,April 2006, 2007, 2008, 2009, 2010, February 2011.

KEMA, *Final Report on Phase 2 Low Income Needs Assessment,* prepared for the California Public Utilities Commission, September 2007.

M. Sami Khawaja, Kevin Monte de Ramos, Anne West, Doug Bruchs, Quantec LLC, in association with Roger Colton, *Low-Income Arrearage Study* prepared for PacifiCorp March 20, 2007.

West Hill Energy & Computing, Inc., *Impact Evaluation of the 2005 California Low-Income Energy Efficiency Program*, Final Report,. December 19, 2007 revised January 10, 2008.

Other States' Low-Income Program Assistance Impact On Bills

APPRISE, *Allegheny Power Universal Service Programs*, Final Evaluation Report, July 2008

Jacqueline Berger and David Carroll, APPRISE, *Energy Affordability Program Design Options*, January 2007

Roger D. Colton, *The Impact of Indiana's Low-Income Utility Affordability Programs on Nonpayment Disconnections*, Sept. 3, 2007.

Roger D. Colton, *An Outcome Evaluation of Indiana's Low-Income Rate Affordability Programs*, 2008/2009 Report, August 2009.

Ken Costello, *How To Determine The Effectiveness of Energy Assistance Programs, And Why It's Important,* National Regulatory Research Institute, December 2009.

John Howat, Jerry McKim, Charlie Harak and Olivia Wein, *Tracking the Home Energy Needs of Low-Income Households Through Trend Data on Arrearages and Disconnections*, National Energy Assistance Director's Association, May 2004

Rick Kunkle, *Washington State Low-Income Weatherization Program Evaluation Report For 2006*, Washington State University Extension Energy Program, March 2008 (see Table B-5 on page B-3).

PA Consulting Group, *Maryland Public Service Commission, Electric Universal Service Program Evaluation, Final Evaluation Report*, May 11, 2007

H. Gil Peach & Associates and Smith & Lehmann, prepared for the State of Nevada, *SFY2009 Evaluation: Energy and Weatherization Assistance Programs*, December 28, 2009

APPENDIX C: DISCONNECTION DATA BY UTILITY

Disconnection data from 2010 is publicly available at http://docs.cpuc.ca.gov/published/proceedings/R1002005.htm

Blank cells in the tables indicate the utility was not able to provide the historical data.

Because utility bills, payment patterns, and disconnection events are seasonal, it is best to compare the same months from year to year. Therefore the annual totals in the tables below only compare data from months in which data is available in both 2009 and 2010.

PG&E All Residential Customer Data

This table counts number of occurrences. One customer account may experience multiple occurrences.

Month	Customers		Disconnect Notices		Disconnects		Reconnects		Payment Arrangements		Accounts With Arrears 61-90 Days		Amount Owed From Bills 60 Days and Older	
	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010
Jan	5,311,524	5,260,162	147,708	254,208	12,060	11,368	7,681	8,509	66,661	104,980	221,454	201,024	$112,065,045	$61,639,224
Feb	5,304,466	5,266,663	172,279	299,941	15,197	14,194	9,655	10,891	67,308	111,877	256,090	241,382	$110,853,359	$69,290,895
Mar	5,305,894	5,274,437	233,753	353,043	26,352	17,717	16,081	14,220	77,869	125,318	289,164	248,232	$117,247,562	$76,064,001
Apr	5,310,880	5,273,082	255,404	319,277	29,363	17,776	19,751	14,629	78,885	113,873	284,273	242,276	$113,502,753	$78,119,684
May	5,314,573	5,271,601	203,242	267,345	33,158	17,201	23,594	14,075	72,257	97,242	278,067	264,030	$108,634,601	$82,240,484
Jun	5,326,342	5,276,785	232,276	316,157	28,331	21,179	19,354	16,768	77,721	102,346	269,618	266,437	$101,547,763	$82,773,742
Jul	5,252,091	5,273,856	231,316	138,088	35,641	10,518	24,296	7,494	82,089	77,113	192,230	258,418	$54,193,870	$80,178,177
Aug	5,245,190	5,285,558	238,168	113,564	29,331	12,251	20,171	8,096	89,632	78,783	204,819	276,336	$51,001,462	$85,052,048
Sep	5,249,540	5,280,541	275,643	150,851	33,243	12,542	23,163	9,047	94,492	92,506	221,784	246,569	$56,144,942	$89,202,778
Oct	5,257,410	5,282,066	271,343	191,182	14,985	16,296	13,284	12,729	91,791	96,017	91,766	[65]	$61,768,478	[1]
Nov	5,257,512	5,282,721	190,937	196,679	9,835	14,562	7,932	11,946	76,127	94,370	104,182		$64,115,100	
Dec	5,258,060	5,287,220	250,507	217,266	4,720	13,467	4,101	11,178	91,048	104,317	100,674		$64,471,515	
ANNUAL TOTAL	5,282,790	5,276,224	2,702,576	2,817,601	272,216	179,071	189,063	139,582	965,880	1,198,742	209,510	249,412	$84,628,871	$78,284,559
	(average all months)		(sum all months)		(sum all months)		(sum all months)		(sum all months)		(average Jan-Sep)		(average Jan-Sep)	

[65] Utilities delay reporting the dollars and accounts past-due until after they make their quarterly performance public. Monthly dollars in arrears data for October, November and December 2010 will be provided on March 25, 2011 in the utilities' March disconnection reports.

PG&E Residential CARE Customer Data

This table counts number of occurrences. One customer account may experience multiple occurrences.

Month	Customers		Disconnect Notices		Disconnects		Reconnects		Payment Arrangements		Accounts With Arrears 61-90 Days		Amount Owed From Bills 60 Days and Older	
	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010
Jan	1,137,916	1,367,674	38,851	114,342	4,355	5,001	2,991	3,825	32,114	55,923	78,468	88,892	$27,738,392	$20,893,989
Feb	1,145,358	1,399,757	46,191	134,925	5,106	6,173	3,629	4,895	31,978	58,753	92,433	106,740	$28,994,205	$23,893,045
Mar	1,159,954	1,430,889	68,032	155,689	8,531	7,497	5,516	6,153	37,339	68,190	105,597	109,191	$33,495,972	$26,278,822
Apr	1,176,257	1,441,926	82,709	141,714	10,320	7,652	7,441	6,380	40,081	63,282	102,295	105,238	$33,182,405	$27,346,666
May	1,191,719	1,448,955	66,213	119,260	11,732	7,364	8,943	6,141	35,577	54,250	99,352	114,102	$32,432,768	$29,000,637
Jun	1,207,722	1,463,197	82,557	142,387	10,474	9,216	7,513	7,414	34,947	57,628	98,424	115,578	$30,880,452	$29,548,128
Jul	1,223,447	1,460,731	85,129	57,600	12,825	4,152	9,282	2,945	39,122	40,579	76,048	115,578	$17,397,545	$29,011,753
Aug	1,245,640	1,473,872	95,615	45,391	11,236	4,892	8,091	3,227	43,731	40,310	85,926	125,075	$17,228,916	$32,296,408
Sep	1,272,837	1,479,574	112,249	64,342	12,515	5,256	9,381	3,752	46,109	50,553	89,729	111,583	$17,877,346	$34,597,426
Oct	1,297,145	1,490,404	112,771	85,877	6,087	7,251	5,354	5,621	44,928	53,691	91,766	[1]	$19,534,199	[1]
Nov	1,320,082	1,490,577	77,896	90,303	4,201	7,022	3,329	5,740	38,581	54,379	104,182		$21,577,620	
Dec	1,351,415	1,499,942	113,324	97,819	2,141	6,281	1,811	5,246	48,488	59,905	100,674		$21,504,152	
ANNUAL TOTAL	1,227,458	1,453,958	981,537	1,249,649	99,523	77,757	73,281	61,339	472,995	657,443	92,030	110,220	$26,580,889	$28,096,319
	(average all months)		(sum all months)		(sum all months)		(sum all months)		(sum all months)		(average Jan-Sep)		(average Jan-Sep)	

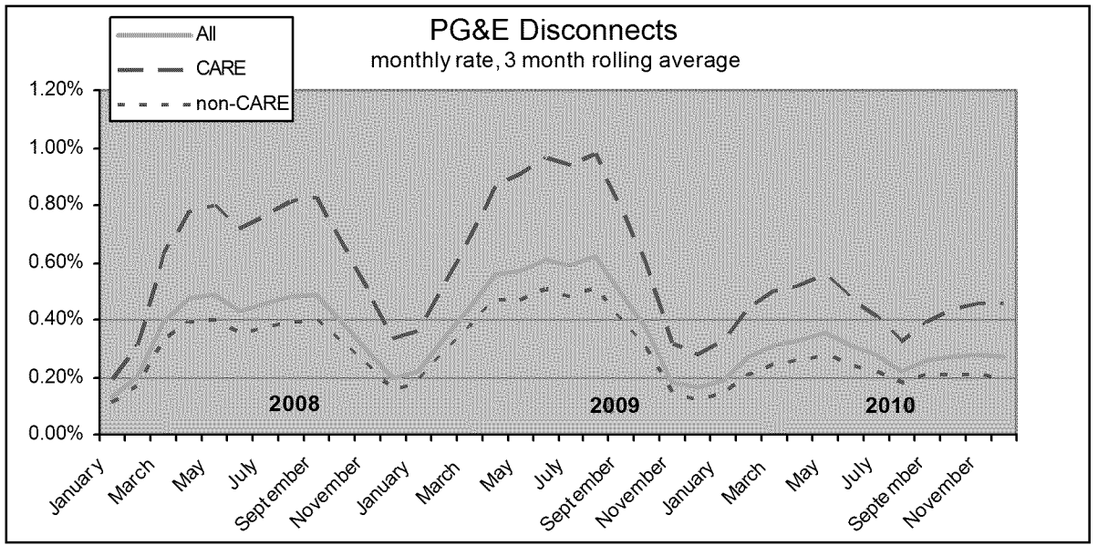
[1] Utilities delay reporting the dollars and accounts past-due until after they make their quarterly performance public. Monthly dollars in arrears data for October, November and December 2010 will be provided on March 25, 2011 in the utilities' March disconnection reports.

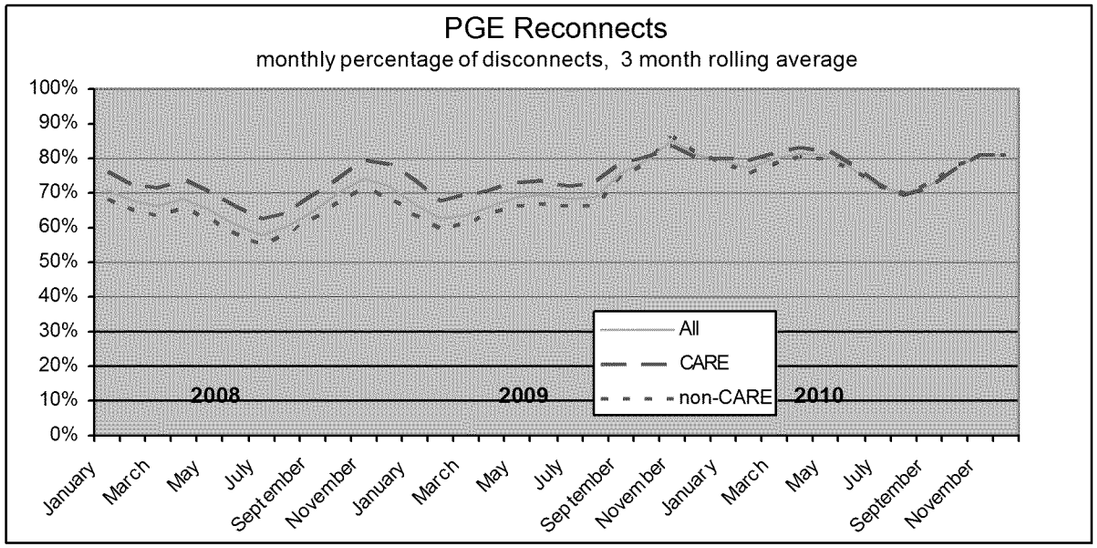
PG&E Residential Except CARE Customer Data

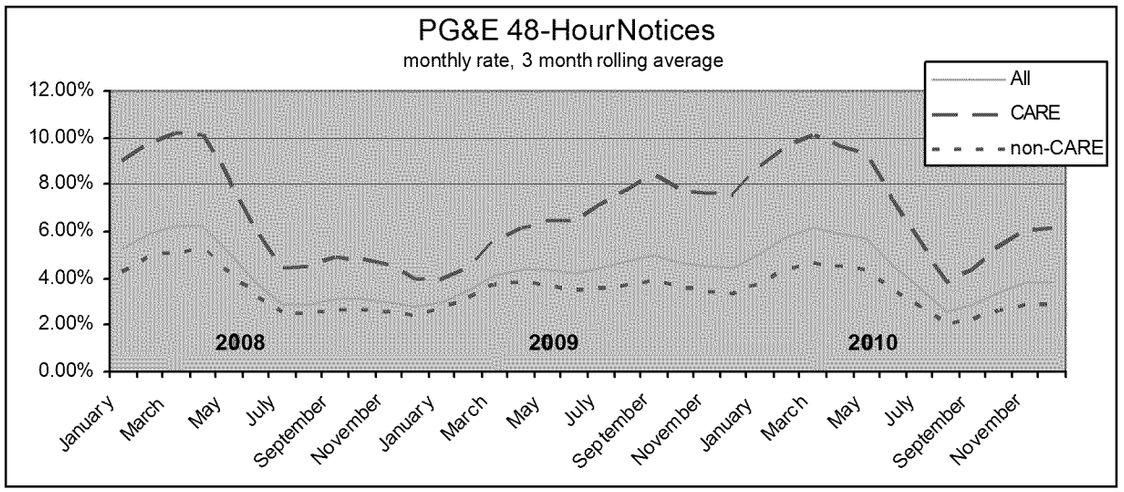
This table counts number of occurrences. One customer account may experience multiple occurrences.

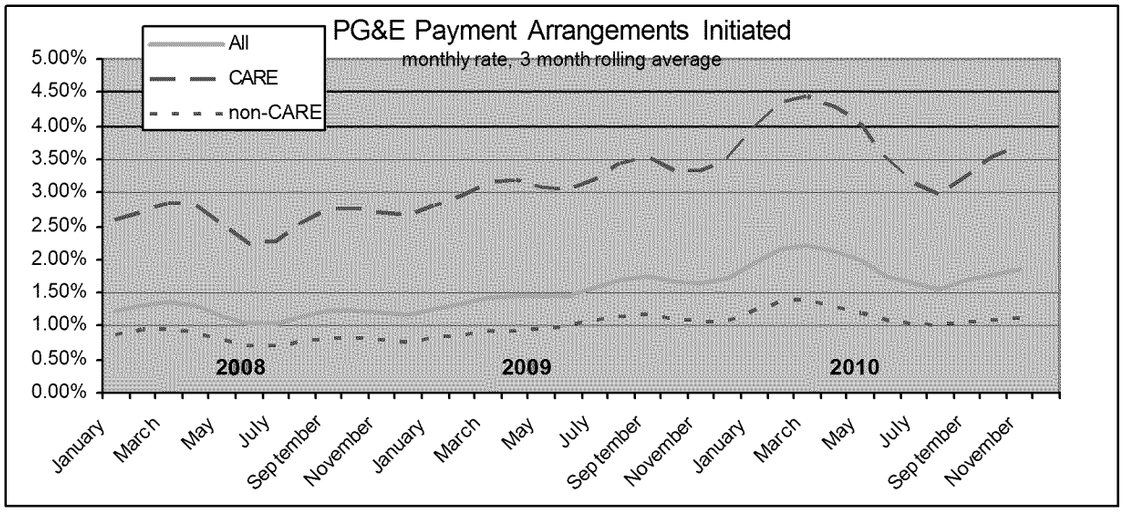
Month	Customers		Disconnect Notices		Disconnects		Reconnects		Payment Arrangements		Accounts With Arrears 61-90 Days		Amount Owed From Bills 60 Days and Older	
	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010
Jan	4,173,608	3,892,488	108,857	139,866	7,705	6,367	4,690	4,684	34,547	49,057	142,986	112,132	$84,326,653	$40,745,235
Feb	4,159,108	3,866,906	126,088	165,016	10,091	8,021	6,026	5,996	35,330	53,124	163,657	134,642	$81,859,154	$45,397,850
Mar	4,145,940	3,843,548	165,721	197,354	17,821	10,220	10,565	8,067	40,530	57,128	183,567	139,041	$83,751,590	$49,785,179
Apr	4,134,623	3,831,156	172,695	177,563	19,043	10,124	12,310	8,249	38,804	50,591	181,978	137,038	$80,320,348	$50,773,018
May	4,122,854	3,822,646	137,029	148,085	21,426	9,837	14,651	7,934	36,680	42,992	178,715	149,928	$76,201,834	$53,239,847
Jun	4,118,620	3,813,588	149,719	173,770	17,857	11,963	11,841	9,354	42,774	44,718	171,194	150,859	$70,667,311	$53,225,614
Jul	4,028,644	3,813,125	146,187	80,488	22,816	6,366	15,014	4,549	42,967	36,534	116,182	142,840	$36,796,325	$51,166,424
Aug	3,999,550	3,811,686	142,553	68,173	18,095	7,359	12,080	4,869	45,901	38,473	118,893	151,261	$33,772,546	$52,755,640
Sep	3,976,703	3,800,967	163,394	86,509	20,728	7,286	13,782	5,295	48,383	41,953	132,055	134,986	$38,267,596	$54,605,352
Oct	3,960,265	3,791,662	158,572	105,305	8,898	9,045	7,930	7,108	46,863	42,326		[1]	$42,234,279	[1]
Nov	3,937,430	3,792,144	113,041	106,376	5,634	7,540	4,603	6,206	37,546	39,991			$42,537,480	
Dec	3,906,645	3,787,278	137,183	119,447	2,579	7,186	2,290	5,932	42,560	44,412			$42,967,363	
ANNUAL TOTAL	4,055,333	3,822,266	1,721,039	1,567,952	172,693	101,314	115,782	78,243	492,885	541,299	154,359	139,192	$65,107,040	$50,188,240
	(average all months)		(sum all months)		(sum all months)		(sum all months)		(sum all months)		(average Jan-Sep)		(average Jan-Sep)	

[1] Utilities delay reporting the dollars and accounts past-due until after they make their quarterly performance public. Monthly dollars in arrears data for October, November and December 2010 will be provided on March 25, 2011 in the utilities' March disconnection reports.


PG&E Disconnects
monthly rate, 3 month rolling average
All
CARE
non-CARE
1.20%
1.00%
0.80%
0.60%
0.40%
0.20%
0.00%
2008
2009
2010
January
March
May
July
September
November


PGE Reconnects
monthly percentage of disconnects, 3 month rolling average
100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%
All
CARE
non-CARE
2008
2009
2010
January
March
May
July
September
November





SCE All Residential Customer Data

This table counts number of occurrences. One customer account may experience multiple occurrences.

Month	Customers		Disconnect Notices		Disconnects		Reconnects		Payment Arrangements		Accounts With Arrears 61-90 Days		Amount Owed From Bills 60 Days and Older	
	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010
Jan	4,186,350	4,204,205		118,644	29,017	3,640	1,321	2,669	165,974	197,527		90,527		$13,461,324
Feb	4,187,112	4,208,016		232,915	27,273	21,657	1,010	15,632	138,863	171,471		68,881		$11,146,023
Mar	4,188,205	4,209,050		479,938	32,247	25,242	1,766	19,294	151,521	171,370		67,153		$11,046,495
Apr	4,189,638	4,211,863		474,024	30,996	25,129	2,367	19,080	139,198	147,673		76,131	$6,516,369	$11,816,752
May	4,191,051	4,214,874		420,511	27,391	25,544	2,027	19,759	139,021	132,913		71,724	$6,722,793	$11,563,467
Jun	4,190,455	4,215,401		417,439	29,489	23,439	1,855	17,595	155,735	143,455		75,647	$5,941,677	$11,706,619
Jul	4,192,472	4,217,851		453,503	26,018	21,458	1,649	16,015	165,570	150,781		73,770	$5,559,777	$11,510,974
Aug	4193059	4,219,657	452,461	451,456	24,546	24,654	1,452	18,316	193,181	176,413	40,225	69,714	$5,359,503	$11,548,381
Sep	4,195,386	4,221,817	518,830	478,851	28,673	22,163	1,409	16,223	209,669	185,596	33,256	73,490	$4,587,452	$12,750,648
Oct	4,197,501	4223680	557,126	498,489	26,936	22,229	1,315	16,282	212,349	169,627	48,343	86,488	$4,070,654	[1]
Nov	4,199,327	4224293	431,033	450,093	20,082	18,015	878	14,984	188,715	157,578	59,871	102,620	$5,799,211	
Dec	4,201,024	4224884	251,702	503,808	11,637	12,707	699	11,064	199,049	165,840	75,525	112,371	$7,223,642	
ANNUAL TOTAL	4,192,632	4,216,299		4,979,671	314,305	245,877	17,748	186,913	2,058,845	1,970,244	51,444	88,937	$5,781,262	$11,816,140
	(average all months)		(sum all months)		(sum all months)		(sum all months)		(sum all months)		(average Aug-Dec)		(average Apr-Sep)	

[1] Utilities delay reporting the dollars and accounts past-due until after they make their quarterly performance public. Monthly dollars in arrears data for October, November and December 2010 will be provided on March 25, 2011 in the utilities' March disconnection reports.

SCE Residential CARE Customer Data

This table counts number of occurrences. One customer account may experience multiple occurrences.

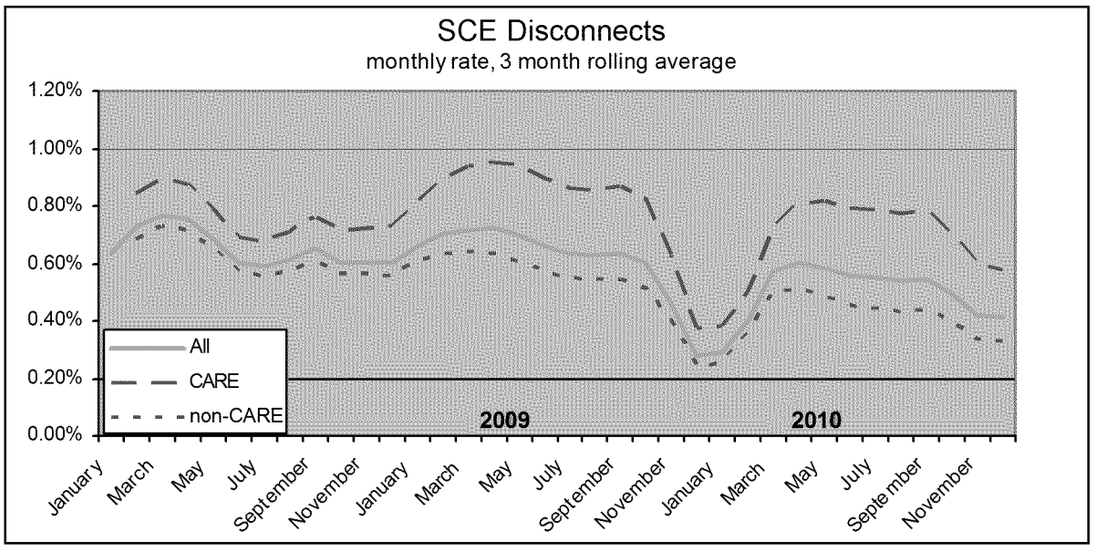
Month	Customers[66]		Disconnect Notices		Disconnects		Reconnects		Payment Arrangements		Accounts With Arrears 61-90 Days		Amount Owed From Bills 60 Days and Older	
	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010
Jan	1,102,274	1,202,227		50,288	9,240	1,520	6,748	1,233		119,726		95,059		$11,469,181
Feb	1,104,863	1,216,743		94,833	9,247	7,875	7,028	6,207		103,303		83,567		$10,048,566
Mar	1,101,691	1,232,620		200,050	11057	9,097	8,245	7,268		105,003		110,503	$5,862,803	$12,220,097
Apr	1,116,348	1,253,213		198,487	10936	10,168	9,419	7,830	64,925	90,188		109,171	$5,040,786	$12,630,247
May	1,120,197	1,268,839		181,344	9,809	10,943	8,350	8,646	66,021	80,967		98,695	$4,930,972	$11,606,715
Jun	1,128,681	1,276,317		183,051	11,019	10,004	9,103	7,721	74,853	87,028		98,788	$5,672,057	$11,054,785
Jul	1,139,652	1,289,444		203,671	9,452	9,454	7,977	7,215	80,949	89,577		92,331	$5,824,186	$11,014,237
Aug	1,151,535	1,300,327	177,027	207,345	8,966	11,038	7,269	8,316	92850	99,875	57,929	101,170	$4,904,950	$12,157,180
Sep	1,157,083	1,307,988	209,909	222,805	11,145	9,785	8,813	7,306	104,680	107,561	59,434	130,953	$5,790,190	$16,594,405
Oct	1,162,900	1,320,277	224,418	233,215	10,189	9,908	8,476	7,380	106,178	97,489	76,295	121,313	$8,562,507	
Nov	1,176,716	1,331,941	174,206	212,303	7,453	8,130	5,952	6,885	94,696	91,569	86,615	127,718	$10,740,852	
Dec	1,187,835	1,335,597	103,803	235,264	4,417	5,631	3,621	5,045	101,875	96,829	110,833	144,849	$12,060,944	
ANNUAL TOTAL	1,137,481	1,277,961		2,222,656	112,930	103,553	91,001	81,052		1,169,115	78,221	125,201	$5,432,278	$12,468,238
	(average all months)		(sum all months)		(sum all months)		(sum all months)		(sum all months)		(average of Aug-Dec)		(average of Mar-Sep)	

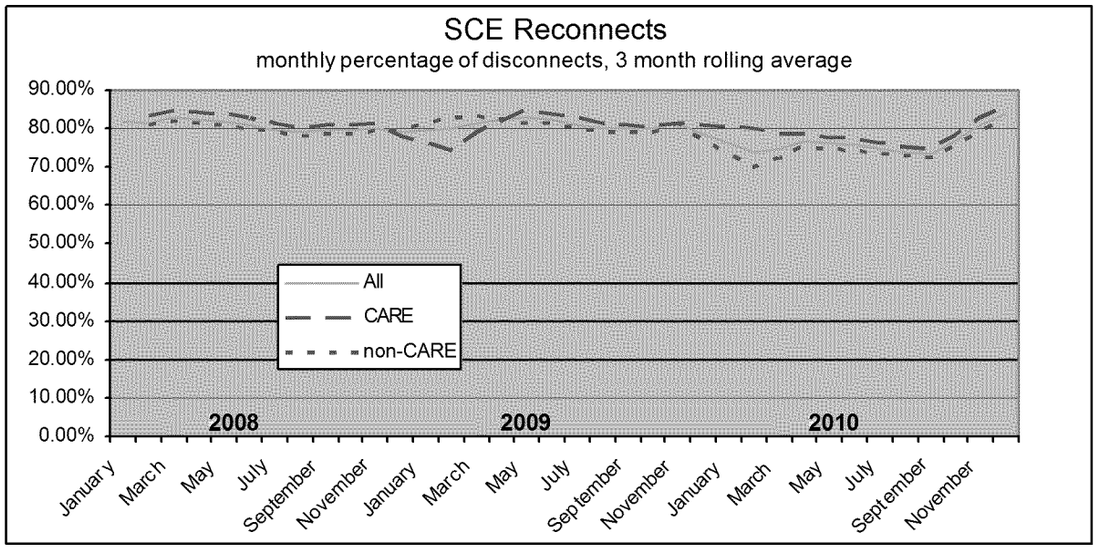
[66] SCE includes in its CARE customer count reported monthly CARE submetered customers. DRA adjusted the SCE CARE customer count to remove an estimate of submetered customers for a more even comparison between CARE-nonCARE data and among the four utilities.

SCE Residential Except CARE Customer Data

This table counts number of occurrences. One customer account may experience multiple occurrences.

Month	Customers		Disconnect Notices		Disconnects		Reconnects		Payment Arrangements		Accounts With Arrears 61-90 Days		Amount Owed From Bills 60 Days and Older	
	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010
Jan	3,084,076	3,001,978		68,356	19,777	2,120	15999	1,436	92,289	77801		41,085		$13,637,489
Feb	3,082,249	2,991,273		138,082	18,026	13,782	15200	9,425	77,484	68168		31,111		$11,633,945
Mar	3,086,514	2,976,430		279,888	21,190	16,145	17536	12,026		66367		28,440	$9,753,568	$13,092,991
Apr	3,073,290	2,958,650		275,537	20,060	14,961	16518	11,250	74273	57485		30,105	$7,755,717	$12,025,971
May	3,070,854	2,946,035		239,167	17,582	14,601	14541	11,113	73000	51946		26,953	$7,880,932	$10,011,188
Jun	3,061,774	2,939,084		234,388	18,470	13,435	14753	9,874	80882	56427		28,497	$7,845,183	$9,813,499
Jul	3,052,820	2,928,407		249,832	16,566	12,004	13486	8,800	84621	61204		26,720	$7,908,215	$9,090,381
Aug	3,041,524	2,919,330	275,434	244,111	15,580	13,616	12247	10,000	100331	76538	18,682	25,173	$6,228,718	$10,011,726
Sep	3,038,303	2,913,829	308,921	256,046	17,528	12,378	13,536	8,917	104989	78035	15,934	26,936	$7,676,015	$14,296,728
Oct	3,034,601	2,903,403	332,708	265,274	16,747	12,321	13,672	8,902	106171	72138	22,249	30,655	$10,341,427	
Nov	3,022,611	2,892,352	256,827	237,790	12,629	9,885	9,983	8,099	94019	66009	27,436	37,028	$13,327,986	
Dec	3,013,189	2,889,287	147,899	268,544	7,220	7,076	6,029	6,019	97174	69011	33,994	39,853	$14,769,360	
ANNUAL TOTAL	3,055,150	2,938,338		2,757,015	201,375	142,324	163,500	105,861		801,129	23,659	31,929	$7,864,050	$11,191,783
	(average all months)		(sum all months)		(sum all months)		(sum all months)		(sum all months)		(average of Aug-Dec)		(average of Mar-Sep)	


SCE Disconnects
monthly rate, 3 month rolling average
1.20%
1.00%
0.80%
0.60%
0.40%
0.20%
0.00%
All
CARE
non-CARE
2009
2010
January
March
May
July
September
November
January
March
May
July
September
November
January
March
May
July
September
November


SCE Reconnects
monthly percentage of disconnects, 3 month rolling average
90.00%
80.00%
70.00%
60.00%
50.00%
40.00%
30.00%
20.00%
10.00%
0.00%
All
CARE
non-CARE
2008
2009
2010
January
March
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July
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November
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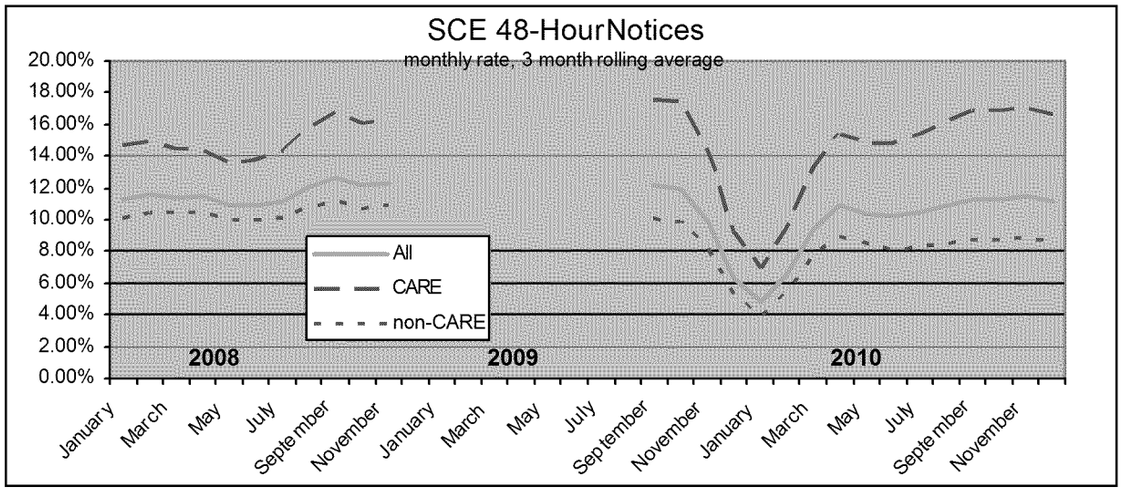
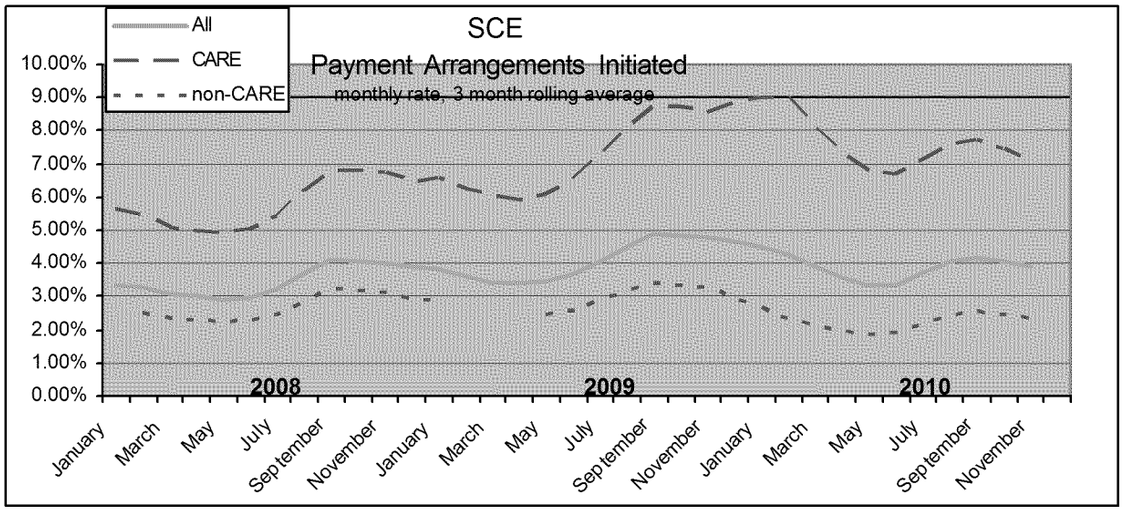
September
November



[67]



[67] Break in chart due to the utility's inability to provide historical data

SDG&E All Residential Customer Data

This table counts number of occurrences. One customer account may experience multiple occurrences.

Month	Customers[68]		Disconnect Notices		Disconnects		Reconnects		Payment Arrangements		Accounts With Arrears 61-90 Days		Amount Owed From Bills 60 Days and Older	
	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010
Jan	1,229,000	1,239,341	23,820	19,977	1,832	1,342	1,321	912	5,723	8,214		115,192		$8,083,247
Feb	1,229,738	1,239,465	19,062	21,703	1,394	1,893	1,010	1,409	5,214	11,052		107,639		$8,014,710
Mar	1,230,069	1,240,574	25,333	28,250	2,324	2,207	1,766	1,637	5,870	18,020		114,609	$8,629,018	$9,613,115
Apr	1,231,053	1,241,636	24,572	28,531	3,042	1,891	2,367	1,392	6,025	16,692		117,359	$8,437,603	$10,144,748
May	1,231,728	1,242,359	21,892	23,799	2,547	2,117	2,027	1,601	5,618	14,734		113,533	$8,183,056	$10,355,866
Jun	1,232,501	1,242,664	22,015	23,929	2,511	1,837	1,855	1,319	4,832	15,070	119,284	122,089	$8,256,890	$10,742,219
Jul	1,233,982	1,243,809	23,840	23,332	2,270	1,568	1,649	1,148	5,219	15,584	112,808	114,940	$7,921,897	$10,686,290
Aug	1,235,100	1,244,304	24,771	25,230	1,963	2,000	1,452	1,462	5,474	17,002		106,940		$10,539,060
Sep	1,235,390	1,244,463	23,640	22,014	1,959	1,357	1,409	1,033	7,365	16,273	109,016	112,148	$7,769,406	$9,583,936
Oct	1,236,917	1,246,186	22,910	19,954	1,822	1,803	1,315	1,305	7,608	15,953	115,773	105,183	$7,398,638	
Nov	1,237,695	1,246,622	20,700	19,481	1,191	1,795	878	1,319	7,172	16,942	118,151		$8,002,295	
Dec	1,238,148	1,247,045	24,371	19,462	874	1,318	699	1,051	7,666	16,613	122,564		$8,433,977	
ANNUAL TOTAL	1,233,443	1,243,206	276,926	275,662	23,729	21,128	17,748	15,588	73,786	182,149	113,703	116,392	$8,199,645	$10,187,696
	(average all months)		(sum all months)		(sum all months)		(sum all months)		(sum all months)		(average of Jun, Jul, Sep)		(average of Mar-Jul, Sep)	

[68] SDG&E did not provide customer counts for its nonCARE customers for January and February 2009 so DRA estimated these counts based on SDG&E's previous data submission of active meters.

SDG&E Residential CARE Customer Data

This table counts number of occurrences. One customer account may experience multiple occurrences.

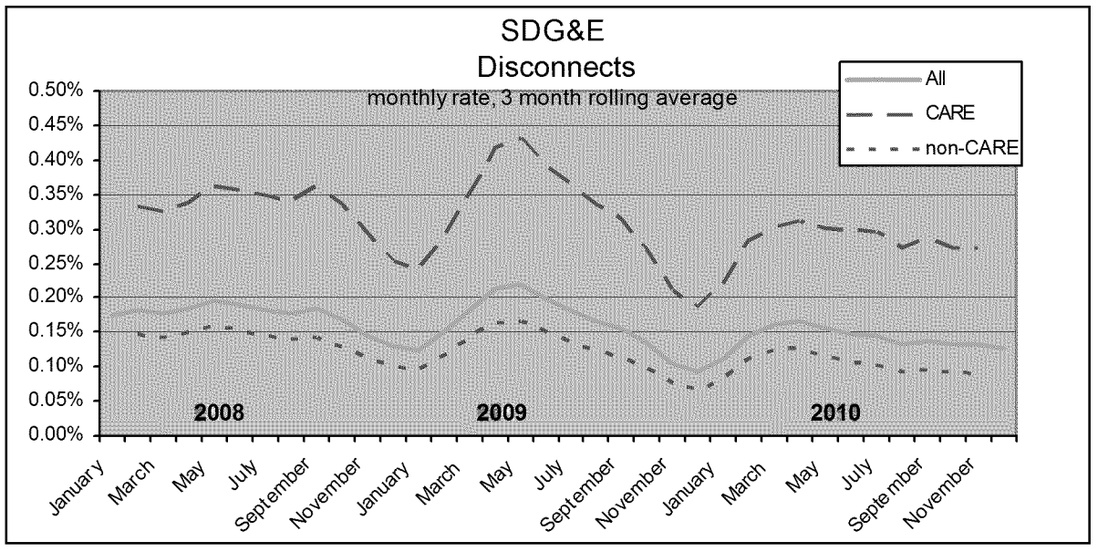
Month	Customers		Disconnect Notices		Disconnects		Reconnects		Payment Arrangements		Accounts With Arrears 61-90 Days		Amount Owed From Bills 60 Days and Older	
	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010
Jan	232,357	260,428	7,687	7,629	673	566	516	405	2,701	4,164		51,092		$3,390,084
Feb	234,755	261,033	5,870	7,739	520	784	415	620	2,368	5,636		47,146		$3,335,391
Mar	236,993	261,005	8,326	10,601	861	861	692	694	2,822	9,273		50,841	$3,119,558	$4,064,763
Apr	239,826	262,404	8,116	10,706	1,133	710	941	556	2,924	8,857		52,386	$3,128,307	$4,266,948
May	242,878	263,947	7,339	8,677	1,010	883	855	683	2,805	7,889		51,955	$3,062,836	$4,446,038
Jun	244,314	265,108	7,554	9,124	994	802	751	634	2,382	8,186	169,954	56,281	$3,107,868	$4,669,003
Jul	245,831	272,209	8,343	9,410	870	712	659	539	2,688	8,766	172,861	53,624	$3,035,541	$4,709,547
Aug	247,928	273,854	9,114	10,222	825	895	626	689	2,685	9,506		50,028		$4,766,063
Sep	250,909	276,823	8,543	9,082	810	634	615	529	3,642	9,415	146,553	52,140	$3,131,984	$4,300,230
Oct	255,313	280,121	8,174	8,269	746	833	568	649	3,717	9,109	149,490		$2,977,624	
Nov	257,205	283,103	7,514	8,085	508	818	395	630	3,642	9,598	157,093		$3,240,506	
Dec	261,023	283,428	9,350	8,418	370	644	310	538	3,961	9,456	166,681		$3,520,685	
ANNUAL TOTAL	245,778	270,289	95,930	107,962	9,320	9,142	7,343	7,166	36,337	99,855	163,123	54,015	$3,097,682	$4,409,421
	(average all months)		(sum all months)		(sum all months)		(sum all months)		(sum all months)		(average of Jun, Jul, Sep)		(average of Mar-Jul, Sep)	

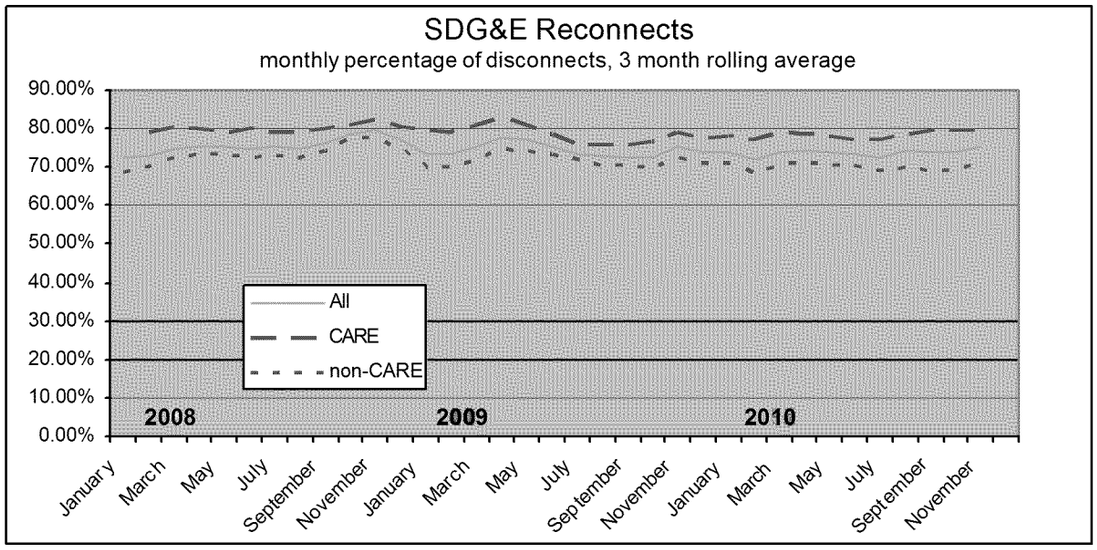
SDG&E Residential Except CARE Customer Data

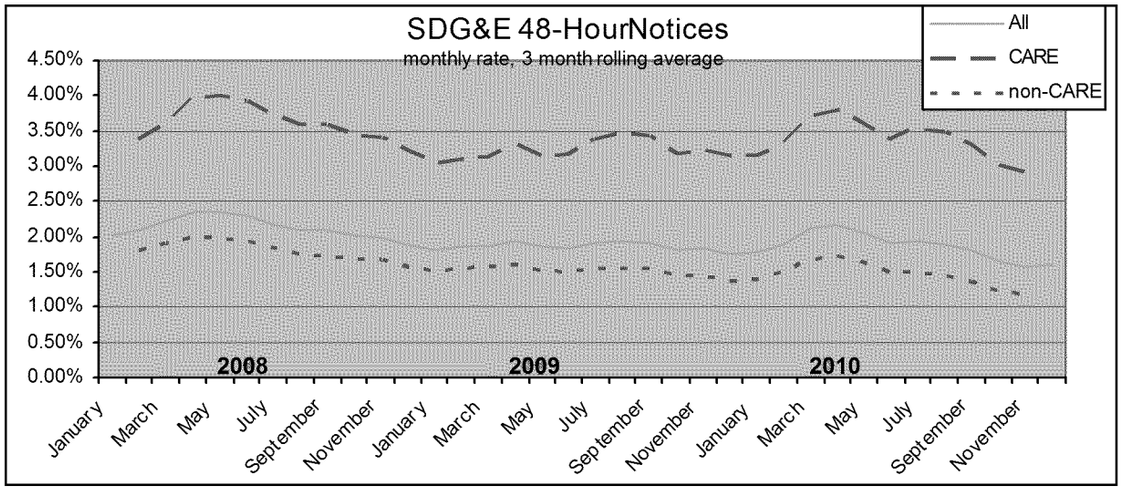
This table counts number of occurrences. One customer account may experience multiple occurrences.

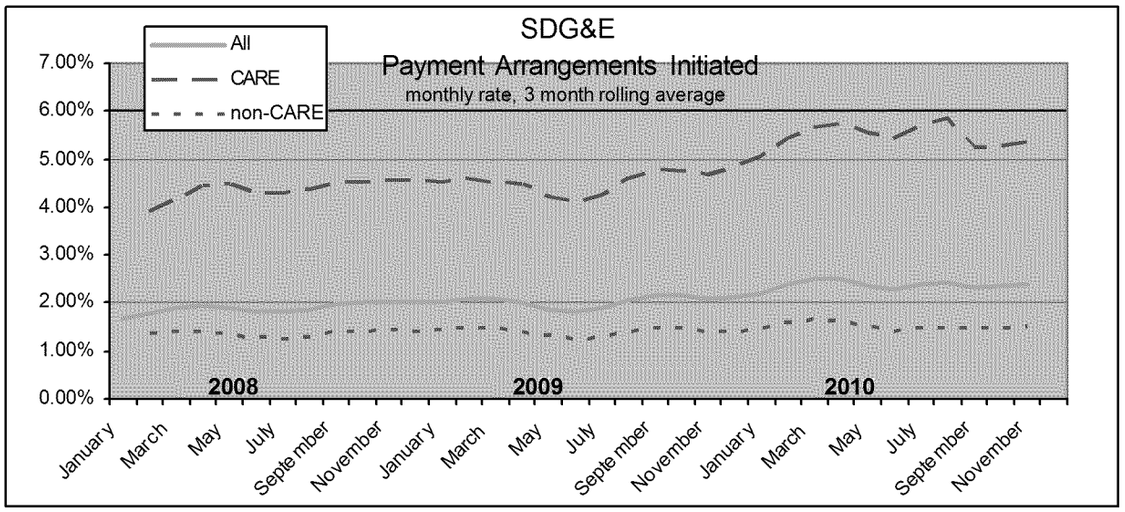
Month	Customers[69]		Disconnect Notices		Disconnects		Reconnects		Payment Arrangements		Accounts With Arrears 61-90 Days		Amount Owed From Bills 60 Days and Older	
	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010
Jan	996,643	978,913	16,133	12,348	1,159	776	805	507	3,022	4,050		64,100		$4,693,163
Feb	994,983	978,432	13,192	13,964	874	1,109	595	789	2,846	5,416		60,493		$4,679,319
Mar	993,076	979,569	17,007	17,649	1,463	1,346	1,074	943	3,048	8,747		63,768	$5,509,460	$5,548,352
Apr	991,227	979,232	16,456	17,825	1,909	1,181	1,426	836	3,101	7,835		64,973	$5,309,296	$5,877,801
May	988,850	978,412	14,553	15,122	1,537	1,234	1,172	918	2,813	6,845		61,578	$5,120,220	$5,909,828
Jun	988,187	977,556	14,461	14,805	1,517	1,035	1,104	685	2,450	6,884	69,525	65,808	$5,149,023	$6,073,217
Jul	988,151	971,600	15,497	13,922	1,400	856	990	609	2,531	6,818	65,607	61,316	$4,886,356	$5,976,743
Aug	987,172	970,450	15,657	15,008	1,138	1,105	826	773	2,789	7,496		56,912		$5,772,997
Sep	984,481	967,640	15,097	12,932	1,149	723	794	504	3,723	6,858	63,171	60,008	$4,637,422	$5,283,706
Oct	981,604	966,065	14,736	11,685	1,076	970	747	656	3,891	6,844	66,906	55,998	$4,421,014	
Nov	980,490	963,519	13,186	11,396	683	977	483	689	3,530	7,344	68,385		$4,761,789	
Dec	977,125	963,617	15,021	11,044	504	674	389	513	3,705	7,157	69,454		$4,913,292	
ANNUAL TOTAL	987,666	972,917	180,996	167,700	14,409	11,986	10,405	8,422	37,449	82,294	66,101	62,377	$5,101,963	$5,778,274
	(average all months)		(sum all months)		(sum all months)		(sum all months)		(sum all months)		(average of Jun, Jul, Sep)		(average of Mar-Jul, Sep)	

[69] SDG&E did not provide customer counts for its nonCARE customers for January and February 2009 so DRA estimated these counts based on SDG&E's previous data submission of active meters.


SDG&E
Disconnects
monthly rate, 3 month rolling average
All
CARE
non-CARE
0.50%
0.45%
0.40%
0.35%
0.30%
0.25%
0.20%
0.15%
0.10%
0.05%
0.00%
2008
2009
2010
January
March
May
July
September
November


SDG&E Reconnects
monthly percentage of disconnects, 3 month rolling average
All
CARE
non-CARE
90.00%
80.00%
70.00%
60.00%
50.00%
40.00%
30.00%
20.00%
10.00%
0.00%
2008
2009
2010
January
March
May
July
September
November





SoCalGas All Residential Customer Data

This table counts number of occurrences. One customer account may experience multiple occurrences.

Month	Customers		Disconnect Notices		Disconnects		Reconnects		Payment Arrangements		Accounts With Arrears 61-90 Days		Amount Owed From Bills 60 Days and Older	
	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010
Jan	5,264,867	5,291,641	58,018	93,854	12,217	10,686	8,230	6,462	109,529	111,867		458,381		$14,667,727
Feb	5,268,729	5,297,836	125,555	105,858	11,565	11,745	8,976	8,456	114,630	115,635		406,244		$18,116,193
Mar	5,272,227	5,302,707	107,004	140,804	14,726	14,931	10,658	10,618	131,957	143,152		500,341		$29,234,256
Apr	5,274,035	5,306,324	118,772	136,120	14,557	14,346	10,408	10,559	120,250	129,503		533,794		$33,126,392
May	5,272,936	5,308,749	107,878	113,858	14,012	13,748	9,704	10,204	104,457	107,261		564,745		$31,286,777
Jun	5,270,004	5,308,796	99,380	135,822	15,121	12,839	10,274	8,928	95,030	111,092		570,747		$28,017,837
Jul	5,265,457	5,307,405	99,020	140,366	13,687	11,898	8,390	8,228	91,821	108,559		555,396		$24,376,883
Aug	5,264,838	5,309,138	88,800	136,935	12,934	12,761	8,855	8,702	85,913	102,007		536,248		$19,727,424
Sep	5,265,525	5,312,337	80,033	121,066	11,914	11,596	8,308	8,620	76,592	92,255		552,254		$16,930,583
Oct	5,269,281	5,316,811	77,440	117,900	11,942	11,003	9,120	9,066	77,874	92,356	542,381		$9,160,720	
Nov	5,275,335	5,321,585	68,605	101,985	8,688	8,475	7,503	7,002	75,091	81,784	541,708		$8,965,921	
Dec	5,282,847	5,327,408	80,842	123,865	6,814	5,410	6,360	5,732	88,537	104,673	588,477		$13,726,958	
ANNUAL TOTAL	5,270,507	5,309,228	1,111,347	1,468,433	148,177	139,438	106,786	102,577	1,171,681	1,300,144				
	(average all months)		(sum all months)		(sum all months)		(sum all months)		(sum all months)		no comparable months yet		no comparable months yet	

SoCalGas Residential CARE Customer Data

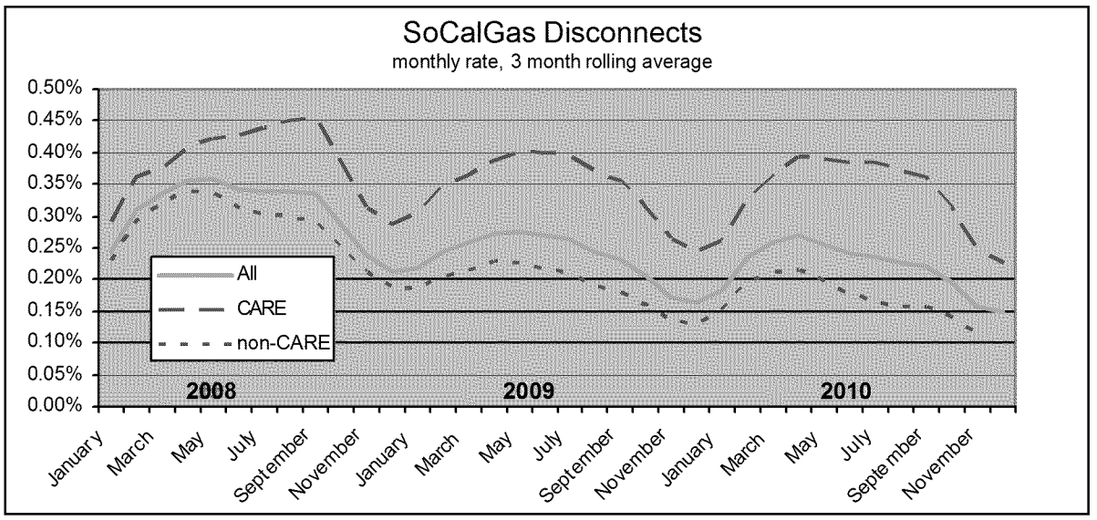
This table counts number of occurrences. One customer account may experience multiple occurrences.

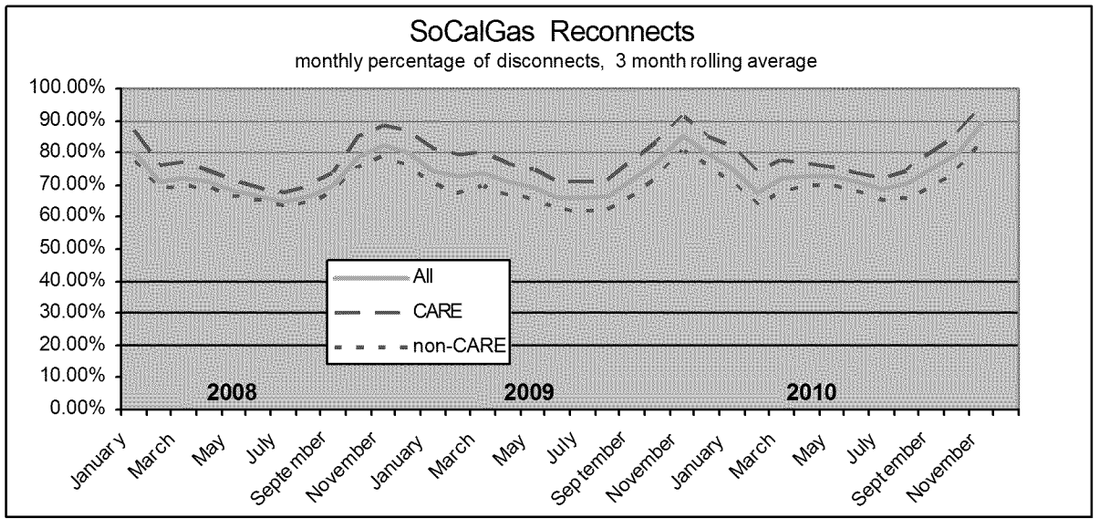
Month	Customers		Disconnect Notices		Disconnects		Reconnects		Payment Arrangements		Accounts With Arrears 61-90 Days		Amount Owed From Bills 60 Days and Older	
	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010
Jan	1,441,382	1,571,380	40,433	40,658	4,932	4,546	3,658	2,972	50,917	54,566		212,652		$7,353,022
Feb	1,450,810	1,573,709	42,578	44,631	4,614	4,750	3,907	3,841	50,682	53,950		186,981		$8,217,845
Mar	1,458,525	1,584,793	49,209	59,158	5,636	6,233	4,494	4,684	56,871	64,700		234,890		$13,062,433
Apr	1,481,315	1,614,136	47,000	58,370	5,831	6,334	4,460	4,886	54,734	61,539		256,165		$15,369,725
May	1,493,227	1,633,528	42,911	52,348	5,717	6,438	4,250	4,980	48,829	53,196		272,758		$15,161,907
Jun	1,494,052	1,656,356	40,086	66,100	6,375	6,433	4,697	4,599	44,828	58,143		275,041		$13,937,416
Jul	1,510,316	1,676,643	41,735	70,369	5,881	6,201	3,848	4,534	45,232	58,711		268,614		$12,658,915
Aug	1,520,244	1,689,241	37,999	68,359	5,720	6,671	4,210	4,785	43,064	55,183		264,021		$11,003,708
Sep	1,531,174	1,685,144	34,087	61,675	5,323	6,063	4,034	4,807	38,655	50,499		271,561		$9,955,573
Oct	1,534,382	1,697,404	33,242	58,034	5,325	5,604	4,421	4,992	37,757	49,983	240,309	273,924	$5,892,268	
Nov	1,542,309	1,707,036	29,550	49,889	3,843	4,263	3,519	3,734	36,704	44,165	243,313		$5,884,919	
Dec	1,560,543	1,714,044	34,990	60,417	3,015	2,705	2,992	2,936	43,268	56,230	269,757		$7,473,433	
ANNUAL TOTAL	1,501,523	1,650,285	473,820	690,008	62,212	66,241	48,490	51,750	551,541	660,865				
	(average all months)		(sum all months)		(sum all months)		(sum all months)		(sum all months)		no comparable months yet		no comparable months yet	

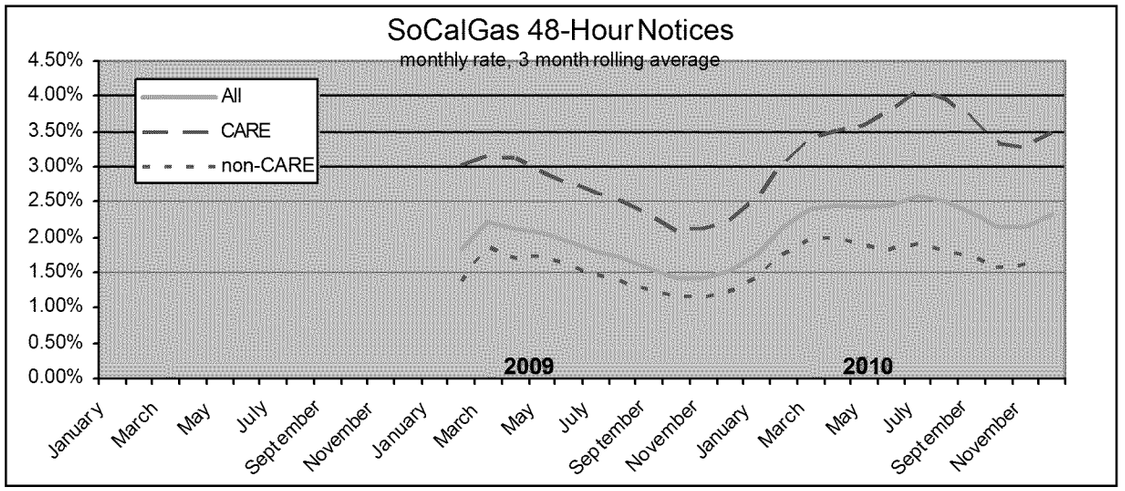
SoCalGas Residential Except CARE Customer Data

This table counts number of occurrences. One customer account may experience multiple occurrences.

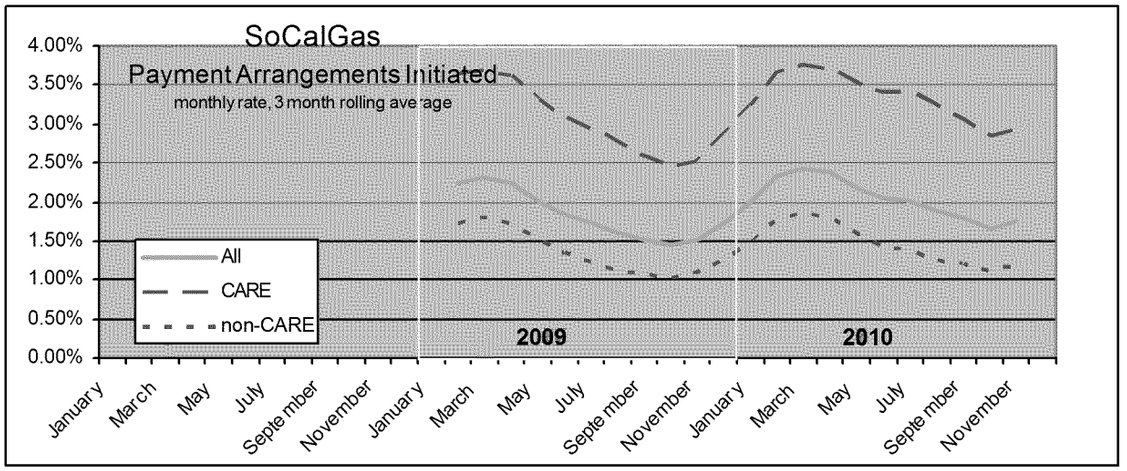
Month	Customers		Disconnect Notices		Disconnects		Reconnects		Payment Arrangements		Accounts With Arrears 61-90 Days		Amount Owed From Bills 60 Days and Older	
	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010
Jan	3,823,485	3,720,261	53,196	17,585	7,285	6,140	4,572	3,490	58,612	57,301		245,729		$7,314,705
Feb	3,817,919	3,724,127	61,227	82,977	6,951	6,995	5,069	4,615	63,948	61,685		219,263		$9,898,348
Mar	3,813,702	3,717,914	81,646	57,795	9,090	8,698	6,164	5,934	75,086	78,452		265,451		$16,171,822
Apr	3,792,720	3,692,188	77,750	71,772	8,726	8,012	5,948	5,673	65,516	67,964		277,629		$17,756,667
May	3,779,709	3,675,221	61,510	64,967	8,295	7,310	5,454	5,224	55,628	54,065		291,987		$16,124,871
Jun	3,775,952	3,652,440	69,722	59,294	8,746	6,406	5,577	4,329	50,202	52,949		295,706		$14,080,421
Jul	3,755,141	3,630,762	69,997	57,285	7,806	5,697	4,542	3,694	46,589	49,848		286,782		$11,717,968
Aug	3,744,594	3,619,897	68,576	50,801	7,214	6,090	4,645	3,917	42,849	46,824		272,227		$8,723,716
Sep	3,734,351	3,627,193	59,391	45,946	6,591	5,533	4,274	3813	37,937	41,756		280,693		$6,975,009
Oct	3,734,899	3,619,407	59,866	44,198	6,617	5,399	4,699	4074	40,117	42,373	302,072		$3,268,452	
Nov	3,733,026	3,614,549	52,096	39,055	4,845	4,212	3,984	3268	38,387	37,619	298,395		$3,081,002	
Dec	3,722,304	3,613,364	63,448	45,852	3,799	2,705	3,368	2796	45,269	48,443	318,720		$6,253,526	
ANNUAL TOTAL	3,768,984	3,658,944	778,425	637,527	85,965	73,197	58,296	50,827	620,140	639,279				
	(average all months)		(sum all months)		(sum all months)		(sum all months)		(sum all months)		no comparable months yet		no comparable months yet	







[70]



[70] Break in chart due to the utility's inability to provide historical data

APPENDIX D: COMPARATIVE DISCONNECTION DATA 2007-2010, BY UTILITY AND FOUR UTILITIES COMBINED

PG&E, SCE, SDG&E and SoCalGas All Residential Customer Data

This table counts number of occurrences. One customer account may experience multiple occurrences.

Month	Customers		Disconnect Notices		Disconnects		Reconnects		Payment Arrangements		Accounts With Arrears 61-90 Days		Amount Owed From Bills 60 Days and Older	
	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010
Jan	15,991,741	15,995,349		486,683	55,126	27,036	39,979	18,552	347,887	422,588		955,162		$109,496,868
Feb	15,990,045	16,011,980		660,417	55,429	49,489	41,869	36,388	326,015	410,035		913,041		$117,104,309
Mar	15,996,395	16,026,768		1,002,035	75,649	60,097	54,286	45,769		457,860		1,064,912		$140,224,460
Apr	16,005,606	16,032,905		957,952	77,958	59,142	58,463	45,660	344,358	407,741		1,082,796		$146,047,042
May	16,010,288	16,037,583		825,513	77,108	58,610	58,216	45,639	321,353	352,150		1,107,153		$145,501,030
Jun	16,019,302	16,043,646		893,347	75,452	59,294	55,339	44,610	333,318	371,963		1,123,967		$142,402,082
Jul	15,944,002	16,042,921		755,289	77,616	45,442	55,798	32,885	344,699	352,037		1,079,519		$135,345,968
Aug	15,938,187	16,058,657	804,200	727,185	68,774	51,666	49,994	36,576	374,200	374,205		1,083,783		$137,487,437
Sep	15,945,841	16,059,158	898,146	772,782	75,789	47,658	55,229	34,923	388,118	386,630		1,127,940		$146,608,430
Oct	15,961,109	16,068,743	928,819	827,525	55,685	51,331	45,867	39,382	389,622	373,953	892,991		$86,413,999	
Nov	15,969,869	16,075,221	711,275	768,238	39,796	42,847	32,248	35,251	347,105	350,674	930,171		$92,071,038	
Dec	15,980,079	16,086,557	607,422	864,401	24,045	32,902	20,810	29,025	386,300	391,443	1,020,652		$100,713,594	
ANNUAL TOTAL	15,979,372	16,044,957	3,949,862	9,541,367	758,427	585,514	568,098	444,660	3,902,975	4,651,279				
	(average all months)		(sum all months)		(sum all months)		(sum all months)		(sum all months)		no comparable months yet		no comparable months yet	

PG&E, SCE, SDG&E and SoCalGas Residential CARE Customer Data

This table counts number of occurrences. One customer account may experience multiple occurrences.

Month	Customers		Disconnect Notices		Disconnects		Reconnects		Payment Arrangements		Accounts With Arrears 61-90 Days		Amount Owed From Bills 60 Days and Older	
	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010
Jan	3,913,929	4,401,709		212,917	19,200	11,633	13,913	8,435		234,379		447,695		$43,106,276
Feb	3,935,786	4,451,242		282,128	19,487	19,582	14,979	15,563		221,642		424,434		$45,494,846
Mar	3,957,163	4,509,307		425,498	26,085	23,688	18,947	18,799		247,166		505,425		$55,626,115
Apr	4,013,746	4,571,679		409,277	28,220	24,864	22,261	19,652		223,866		522,960		$59,613,585
May	4,048,021	4,615,269		361,629	28,268	25,628	22,398	20,450		196,302		537,510		$60,215,296
Jun	4,074,769	4,660,978		400,662	28,862	26,455	22,064	20,368		210,985		545,688		$59,209,332
Jul	4,119,246	4,699,027		341,050	29,028	20,519	21,766	15,233		197,633		530,147		$57,394,452
Aug	4,165,347	4,737,294		331,317	26,747	23,496	20,196	17,017		204,874		540,294		$60,223,358
Sep	4,212,003	4,749,529	364,788	357,904	29,793	21,738	22,843	16,394	193,086	218,028		566,237		$65,447,635
Oct	4,249,740	4,788,206	378,605	385,395	22,347	23,596	18,819	18,642	192,580	210,272	457,237		$36,966,598	
Nov	4,296,312	4,812,657	289,166	360,580	16,005	20,233	13,195	16,989	173,623	199,711	483,876		$41,443,897	
Dec	4,360,816	4,833,011	261,467	401,918	9,943	15,261	8,734	13,765	197,592	222,420	534,374		$44,559,214	
ANNUAL TOTAL	4,112,240	4,652,492	1,294,026	4,270,275	283,985	256,693	220,115	201,307	756,881	2,587,278				
	(average all months)		(sum all months)		(sum all months)		(sum all months)		(sum all months)		no comparable months yet		no comparable months yet	

PG&E, SCE, SDG&E and SoCalGas Residential Except CARE Customer Data

This table counts number of occurrences. One customer account may experience multiple occurrences.

Month	Customers		Disconnect Notices		Disconnects		Reconnects		Payment Arrangements		Accounts With Arrears 61-90 Days		Amount Owed From Bills 60 Days and Older	
	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010	2009	2010
Jan	12,077,812	11,593,640		273,766	35,926	15,403	26,066	10,117		188,209		507,467		$66,390,592
Feb	12,054,259	11,560,738		378,289	35,942	29,907	26,890	20,825		188,393		488,607		$71,609,462
Mar	12,039,232	11,517,461		576,537	49,564	36,409	35,339	26,970		210,694		559,487		$84,598,345
Apr	11,991,860	11,461,226		548,675	49,738	34,278	36,202	26,008		183,875		559,836		$86,433,457
May	11,962,267	11,422,314		463,884	48,840	32,982	35,818	25,189		155,848		569,643		$85,285,734
Jun	11,944,533	11,382,668		492,685	46,590	32,839	33,275	24,242		160,978		578,279		$83,192,751
Jul	11,824,756	11,343,894		414,239	48,588	24,923	34,032	17,652		154,404		549,372		$77,951,516
Aug	11,772,840	11,321,363		395,868	42,027	28,170	29,798	19,559		169,331		543,489		$77,264,079
Sep	11,733,838	11,309,629	533,358	414,878	45,996	25,920	32,386	18,529	195,032	168,602		561,703		$81,161,079
Oct	11,711,369	11,280,537	550,214	442,130	33,338	27,735	27,048	20,740	197,042	163,681	435,754		$60,265,173	
Nov	11,673,557	11,262,564	422,109	407,658	23,791	22,614	19,053	18,262	173,482	150,963	446,295		$63,708,256	
Dec	11,619,263	11,253,546	345,955	462,483	14,102	17,641	12,076	15,260	188,708	169,023	486,278		$68,903,541	
ANNUAL TOTAL	11,867,132	11,392,465	1,851,636	5,271,092	474,442	328,821	347,983	243,353	754,264	2,064,001				
	(average all months)		(sum all months)		(sum all months)		(sum all months)		(sum all months)		no comparable months yet		no comparable months yet	

The tables below compare rates of disconnection events using two sets of data. The first set of data, the basis for the tables below labeled "All Occurrences, As % of Accounts" counts each occurrence during the year (one customer account may experience multiple occurrences) and presents the rate as a percentage of accounts. It is conventional in other state and national disconnection analyses to present the rate this way, despite the fact that the multiple occurrences make the rate appear to affect a greater percentage of the customer base than are actually affected.

The second set of data, the basis for the tables below labeled "Accounts With One or More Occurrence, as % of Accounts," counts only the customer accounts affected one or more times during the year, and thus reflects the percentage of the customer base actually affected, with the following caveat:

*Note regarding data tables "Accounts With One Or More Occurrence" broken down by CARE and All Residential Except CARE: In order to present this data separated by CARE status, we must assume the customer's CARE status remains the same for the entire calendar year and the following month in which the CARE status data is run. Because the account status data is captured at a different time than the disconnection occurrence data, this is not actually the case. The data for the All Residential table does not have this problem. Because net CARE churn is an overall small percentage of total customers enrolled in CARE, DRA believes the tables separated by CARE and All Residential Except CARE still provide much-needed insight into how much of the customer base is affected by the events.

	48-HOUR NOTICES OF DISCONNECTION (All Occurrences, As % of Accounts)															
	All Residential						CARE						All Residential Except CARE			
	4 IOUs	PG&E	SCE	SDG&E	SoCalGas		4 IOUs	PG&E	SCE	SDG&E	SoCalGas		4 IOUs	PG&E	SCE	SDG&E	SoCalGas
2007		63%	138%	23%				106%	179%					51%	125%		
2008		50%	141%	26%				81%	182%	43%				42%	126%	22%	
2009		51%		22%	21%			79%		39%	32%			42%		18%	17%
2010	59%	54%	112%	23%	26%		92%	86%	173%	40%	42%		46%	41%	94%	17%	21%

	48-HOUR NOTICES OF DISCONNECTION (Accounts With One or More Occurrence, As % of Accounts)*															
	All Residential						CARE						All Residential Except CARE			
	4 IOUs	PG&E	SCE	SDG&E	SoCalGas		4 IOUs	PG&E	SCE	SDG&E	SoCalGas		4 IOUs	PG&E	SCE	SDG&E	SoCalGas
2007		22%	36%	8%				34%						19%			
2008		19%	36%	9%				26%		14%				17%		7%	
2009		19%	35%	8%				31%		14%				15%		6%	
2010	19%	19%	32%	8%	12%		31%	31%	48%	15%	20%		13%	15%	18%	6%	9%

	48-HOUR NOTICE OF DISCONNECTION (Average Occurrence Per Account Receiving 2-Day Notice)*															
	All Residential						CARE						All Residential Except CARE			
	4 IOUs	PG&E	SCE	SDG&E	SoCalGas		4 IOUs	PG&E	SCE	SDG&E	SoCalGas		4 IOUs	PG&E	SCE	SDG&E	SoCalGas
2007		2.87	3.88	2.92				3.11		2.95				2.75		2.90	
2008		2.67	3.87	2.99				3.11		2.99				2.50		2.98	
2009		2.68		2.86				2.56		2.49				2.75		2.92	
2010	3.08	2.76	3.67	2.74	2.38		2.97	2.73	3.63	2.64	2.10		3.11	2.79	3.70	2.80	2.37

	DISCONNECTIONS (All Occurrences, As % of Accounts)															
	All Residential						CARE						All Residential Except CARE			
	4 IOUs	PG&E	SCE	SDG&E	SoCalGas		4 IOUs	PG&E	SCE	SDG&E	SoCalGas		4 IOUs	PG&E	SCE	SDG&E	SoCalGas
2007	4.54%	4.00%	7.28%	2.13%	3.45%			5.69%			4.14%			3.52%			3.22%
2008	4.92%	4.40%	7.89%	2.10%	3.75%		6.67%	7.28%	9.19%	4.00%	4.65%		4.38%	3.64%	7.44%	1.68%	3.42%
2009	4.75%	5.15%	7.50%	1.92%	2.81%		6.94%	8.17%	9.96%	3.81%	4.15%		3.99%	4.24%	6.58%	1.46%	2.28%
2010	3.65%	3.39%	5.83%	1.70%	2.63%		5.52%	5.35%	8.08%	3.39%	4.02%		2.89%	2.65%	4.84%	1.23%	2.00%

	DISCONNECTIONS (Accounts With One or More Occurrence, As % of Accounts)*															
	All Residential						CARE						All Residential Except CARE			
	4 IOUs	PG&E	SCE	SDG&E	SoCalGas		4 IOUs	PG&E	SCE	SDG&E	SoCalGas		4 IOUs	PG&E	SCE	SDG&E	SoCalGas
2007		3.17%	5.56%	1.73%				4.50%						2.79%			
2008		3.95%	6.25%	1.72%				6.15%		3.30%				3.37%		1.37%	
2009	3.87%	4.11%	6.02%	1.57%	2.46%			5.36%		3.12%	3.66%			3.73%		1.19%	1.98%
2010	3.04%	2.85%	4.65%	1.44%	2.32%		4.70%	4.03%	7.29%	2.90%	3.57%		2.12%	2.40%	2.44%	1.03%	1.76%

	DISCONNECTIONS (Average Occurrence Per Account Disconnected)*															
	All Residential						CARE						All Residential Except CARE			
	4 IOUs	PG&E	SCE	SDG&E	SoCalGas		4 IOUs	PG&E	SCE	SDG&E	SoCalGas		4 IOUs	PG&E	SCE	SDG&E	SoCalGas
2007		1.26	1.31	1.23				1.27		1.23				1.26		1.24	
2008		1.11	1.26	1.22				1.19		1.21				1.08		1.23	
2009	1.23	1.25	1.25	1.22	1.14			1.51		1.21	1.13			1.14		1.23	1.15
2010	1.20	1.19	1.25	1.18	1.13		1.17	1.33	1.11	1.17	1.12		1.22	1.11	1.39	1.19	1.14

	RECONNECTIONS (All Occurrences, As % of Disconnections)															
	All Residential						CARE						All Residential Except CARE			
	4 IOUs	PG&E	SCE	SDG&E	SoCalGas		4 IOUs	PG&E	SCE	SDG&E	SoCalGas		4 IOUs	PG&E	SCE	SDG&E	SoCalGas
2007		72%	82%	75%	74%			77%			79%			70%			72%
2008	74%	67%	81%	76%	72%		77%	72%	82%	80%	76%		72%	64%	80%	73%	70%
2009	76%	71%	81%	75%	73%		78%	75%	81%	79%	79%		75%	70%	81%	72%	69%
2010	76%	77%	76%	74%	75%		79%	78%	79%	78%	80%		74%	77%	74%	70%	71%

	RECONNECTIONS (Accounts With One or More Occurrence, As % of Accounts)*															
	All Residential						CARE						All Residential Except CARE			
	4 IOUs	PG&E	SCE	SDG&E	SoCalGas		4 IOUs	PG&E	SCE	SDG&E	SoCalGas		4 IOUs	PG&E	SCE	SDG&E	SoCalGas
2007		2.31%	4.60%	1.24%				3.50%						1.98%			
2008		2.73%	5.05%	1.25%				4.56%		2.56%				2.25%		0.96%	
2009	2.97%	3.02%	4.93%	1.14%	1.78%			4.98%		2.40%	2.86%			2.43%		0.82%	1.35%
2010	2.41%	2.24%	3.89%	1.05%	1.71%		3.98%	3.56%	6.36%	2.25%	2.79%		1.59%	1.74%	1.96%	0.71%	1.22%

	RECONNECTIONS (Average Occurrence Per Account Reconnected)*															
	All Residential					CARE					All Residential Except CARE					
	4 IOUs	PG&E	SCE	SDG&E	SoCalGas	4 IOUs	PG&E	SCE	SDG&E	SoCalGas	4 IOUs	PG&E	SCE	SDG&E	SoCalGas	
2007		1.23	1.30	1.29			1.23		1.27			1.23		1.30		
2008		1.05	1.26	1.27			1.12		1.24			1.02		1.29		
2009	1.20	1.18	1.23	1.26	1.14		1.20		1.24	1.13		1.18		1.28	1.15	
2010	1.28	1.60	1.14	1.20	1.13	1.09	1.19	1.00	1.18	1.12	1.21	1.17	1.28	1.21	1.14	

	DIFFERENCES BETWEEN DISCONNECTIONS AND RECONNECTIONS (Accounts With One or More Occurrence)*															
	All Residential					CARE					All Residential Except CARE					
	4 IOUs	PG&E	SCE	SDG&E	SoCalGas	4 IOUs	PG&E	SCE	SDG&E	SoCalGas	4 IOUs	PG&E	SCE	SDG&E	SoCalGas	
2007		0.85%	0.95%	0.49%			1.00%					0.81%				
2008		1.22%	1.20%	0.47%			1.59%		0.74%			1.12%		0.41%		
2009	1%	1.09%	1.09%	0.44%	0.68%		0.38%		0.72%	0.81%		1.31%		0.37%	0.63%	
2010	1%	0.60%	0.75%	0.39%	0.61%	0.72%	0.47%	0.93%	0.65%	0.78%	0.53%	0.65%	0.47%	0.32%	0.54%	

	PAYMENT PLANS ESTABLISHED (All Occurrences, As % of Accounts)															
	All Residential					CARE					All Residential Except CARE					
	4 IOUs	PG&E	SCE	SDG&E	SoCalGas	4 IOUs	PG&E	SCE	SDG&E	SoCalGas	4 IOUs	PG&E	SCE	SDG&E	SoCalGas	
2007		16%	40%	20%	0%		33%	67%	0%	0%		0%				
2008		14%	42%	23%	0%		31%	70%	11%	0%						
2009		18%	49%	24%	22%		38%	87%	15%	37%						
2010		23%	47%	29%	24%		45%	92%	37%	40%						

	PAYMENT PLANS ESTABLISHED (Accounts With One or More Occurrence, As % of Accounts)*															
	All Residential					CARE					All Residential Except CARE					
	4 IOUs	PG&E	SCE	SDG&E	SoCalGas	4 IOUs	PG&E	SCE	SDG&E	SoCalGas	4 IOUs	PG&E	SCE	SDG&E	SoCalGas	
2007		10%	24%	3%			20%					8%				
2008		9%	24%	3%			19%		5%			7%		1%		
2009	16%	11%	27%	4%	16%		24%		7%	24%		7%		2%	12%	
2010		12%	20%				24%	36%				8%	9%			

	PAYMENT PLANS ESTABLISHED (Average Occurrence Per Account With Payment Plan Established)*															
	All Residential					CARE					All Residential Except CARE					
	4 IOUs	PG&E	SCE	SDG&E	SoCalGas	4 IOUs	PG&E	SCE	SDG&E	SoCalGas	4 IOUs	PG&E	SCE	SDG&E	SoCalGas	
2007		1.51	1.69	1.27			1.63		2.51			1.42		2.63		
2008		1.54	1.73	1.32			1.65		2.28			1.45		2.43		
2009	1.65	1.63	1.85	1.36	1.41		1.58		2.11	1.50		1.67		2.22	1.34	
2010		1.86	2.35				1.91	2.51				1.79	2.14			

	UNCOLLECTIBLES (Bad Debt Written Off)															
	Authorized Uncollectible Rate					Actual Uncollectible Rate					Uncollectible (millions $)					
		PG&E	SCE	SDG&E	SoCalGas		PG&E	SCE	SDG&E	SoCalGas		PG&E	SCE	SDG&E	SoCalGas	
2007		0.2586%	0.2250 %	0.0000%			0.2803%		0.1600%	0.2250%		41.05	17.3	4.36	9.83	
2008		0.2586%	0.2250%	0.1410%	0.2380%		0.3678%		0.1830%	0.3380%		55.80	20.8	4.94	14.62	
2009		0.2586%	0.2400%	0.1410%	0.2380%		0.4913%	0.2420%	0.2230%	0.3730%		70.82	23.3	6.31	12.86	
2010		0.2586%	0.2400%	0.1410%	0.2380%		not available until March 2011					not available until March 2011				
2011		0.3105%	0.2400%	0.1410%	0.2380%											
2012		0.3105	0.227%[71]	0.174 %[72]	0.278%[73]											

[71] Requested in SCE Application 10-11-015.
[72] Requested in SDG&E Application 10-12-005.
[73] Requested in SoCalGas Application 10-12-006.

APPENDIX E: ENERGY ASSISTANCE PROGRAM DATA 2007-2010, BY UTILITY AND FOUR UTILITIES COMBINED

CARE (California Alternate Rates for Energy) data and Low Income Energy Assistance (LIEE) data is publicly available at http://www.liob.org/resultsqv.cfm?doctypes=10.

Temporary Energy Assistance for Families (TEAF) American Resource and Recovery Act (ARRA) grant data was provided via utility data request and will be publicly reported in utilities' annual CARE and LIEE reports forthcoming on May 1, 2011.

Federal Program Data: Low Income Home Energy Assistance Program (LIHEAP) Energy Assistance, LIHEAP Weatherization (Wx) and Department of Energy's Weatherization Assistance Program (WAP) was provided by the State of California's Department of Community Services and Development in emails of February 14, 2011 and February 16, 2011.

REACH (Relief for Energy Assistance through Community Help) is PG&E's charitable assistance program
EAF (Energy Assistance Fund) is SCE's charitable assistance program
NTN (Neighbor-to-Neighbor) is SDG&E's charitable assistance program
GAF (Gas Assistance Fund) is SoCalGas' charitable assistance program

	DOLLARS DISTRIBUTED - ENERGY ASSISTANCE (DISCOUNT & GRANT) PROGRAMS 2010															
	Total $ Amount						Number of Households						$ Per Household Per Year			
	4 IOUs	PG&E	SCE	SDG&E	SoCalGas		4 IOUs	PG&E	SCE	SDG&E	SoCalGas		4 IOUs[74]	PG&E	SCE	SDG&E	SoCalGas
CARE	1,399,283,851	824,812,578	353,320,166	86,398,899	134,752,208		4,888,533	1,499,942	1,381,109	293,438	1,714,044		$286	$550	$256	$294	$79
LIHEAP	60,032,666	33,328,778	16,623,305	5,024,637	5,055,946		176,170	94,881	49,570	14,622	17,097		$341	$351	$335	$344	$296
TEAF (ARRA GRANT)_	4,312,244	3,082,160	873,830	151,555	204,698		14,115	8,399	3,301	461	1,954		$306	$367	$265	$329	$105
REACH NTN GAF EAF	3,548,549	1,631,189	991,420	228,689	697,251		26,532	6,203	10,945	1,174	8,210		$134	$263	$91	$195	$85

[74] SCG and SCE joint customers may receive assistance from both companies

	DOLLARS SPENT HOME RETROFIT/WEATHERIZATION 2010																
	Total $ Amount						Number of Households						$ Per Household Per Year				
	4 IOUs	PG&E	SCE	SDG&E	SoCalGas			PG&E	SCE	SDG&E	SoCalGas			PG&E	SCE	SDG&E	SoCalGas
LIEE	275,814,410	135,337,734	58,975,023	16,179,817	65,321,836		383,623	129,856	121,868	21,603	110,296		$719	$1,042	$484	$749	$592
Wx/WAP	77,218,366						46,924						$1,646				