

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission's Own Motion to address the issue of customers' electric and natural gas service disconnection.

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

**RESPONSE OF THE DIVISION OF RATEPAYER ADVOCATES TO  
MOTION OF THE UTILITY REFORM NETWORK**

In accordance with Rule 11.1(e) of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), the Division of Ratepayer Advocates ("DRA") hereby submits its response in support of the September 28, 2011 motion of The Utility Reform Network ("TURN") for a ruling directing Southern California Edison Company ("SCE") to delay its implementation of remote disconnections pending the Phase II decision in this proceeding, the Commission's rulemaking to address electric and natural gas service disconnections.

DRA supports TURN's motion. DRA agrees with TURN that "[b]y delaying the implementation of remote disconnections for nonpayment by just a few months, SCE will provide its customers and employees with benefits" by avoiding customer confusion and potential harm from implementing practices that could be inconsistent with the Commission's pending determination of the appropriate remote disconnection standards (*see* TURN Motion, p.7). SCE already has the highest disconnection rates among the California investor-owned utilities<sup>1</sup> and, as TURN notes, SCE's disconnections will

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<sup>1</sup> SCE had made disconnections equal to 8.43% of its CARE customers, compared to Pacific Gas & Electric Company's CARE disconnection rate of 5.39%, and San Diego Gas & Electric Company's CARE disconnection rate of 3.41%. These are the annual rates for the period from September 2010 through August 2011. The monthly average rates are less than 1% of SCE CARE customers, and less than 0.5% of PG&E, SDG&E, and Southern California Gas Company customers. See monthly utility reports filed in R.10-02-005.

increase with the implementation of remote disconnections (*see* TURN Motion, pp. 4-5). Furthermore, the PG&E data regarding remote disconnection demonstrates that customers with remote disconnection functionality are more likely to have their disconnect orders fulfilled than customers without remote disconnection functionality (*see* DRA Comments of May 20, 2011, pp. 15-16). TURN is correct in that it is more beneficial to SCE customers to wait until the Commission's pending decision on remote disconnection protocols, as well as disconnection rates and continued protections, is issued. Starting remote disconnections now, before the Commission has issued its Phase II decision, produces no benefits for SCE's ratepayers, particularly given the apparent lack of customer education regarding the changes in utility practice related to remote disconnections (*see* TURN Motion, pp. 6-7). By contrast, both SCE and its customers would benefit from having the consistency and certainty that the Commission's pending decision would provide.

Accordingly, DRA respectfully urges the Commission to grant TURN's motion and direct SCE to suspend remote disconnections until the Commission issues its Phase II decision.

Respectfully submitted,

/s/ MARION PELEO

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