

**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.

(U 39 M)

R. 10-02-005
(Filed February 4, 2010)

**PACIFIC GAS AND ELECTRIC COMPANY'S COMPLIANCE
REPORT PURSUANT TO DECISION 12-03-054**

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I. INTRODUCTION

Pursuant to Decision (D.)12-03-054 (Decision), Ordering Paragraph 6, Pacific Gas and Electric Company (PG&E) hereby submits its compliance report to explain:

- (a) how PG&E will notify vulnerable customers who are not medical baseline/life support customers of their option to provide certification and thereby receive an in-person field visit prior to service termination. This new option will be made available to customers with a serious illness or condition that could become life-threatening if service is disconnected for nonpayment;
- (b) how PG&E will implement the directive to communicate with customers regarding their option to align their bill payment date with their income cycle notwithstanding the date printed on the bill; and
- (c) the results of the language option review directed in D.12-03-054, Section 3.4.

II. COMPLIANCE

A. Customers with a Serious Illness or Condition that Could Become Life Threatening if Service is Disconnected.

Currently, PG&E is notifying customers of their option to self-certify as a vulnerable customer if they have a serious illness or condition that could become life-threatening, as a part of the disconnection outbound call process. PG&E's Interactive Voice Response (IVR) system will initiate the final notification call (4 days prior to disconnection) which informs a customer of the vulnerable customer option by stating: "If you or a resident of your home has a serious illness

or condition that could become life-threatening if your electric or gas service is disconnected, please contact us immediately.” As a vulnerable customer, the customer is entitled to an in-person visit from a PG&E representative within 48 hours prior to disconnection, or at the time of disconnection for nonpayment for a 90-day period.

In addition, if in the course of the conversation with the PG&E customer service representative (CSR) the customer declares that they, or someone in their home, has a serious medical condition that could become life-threatening if service is disconnected, the CSR will inform the customer that they may apply for a Medical Baseline/Life Support allocation. If the condition is temporary and/or does not require increased electric usage, he/she will be advised that he/she can self-certify as a vulnerable customer that has a serious illness or condition that could become life-threatening if service is disconnected. Vulnerable customers will receive a confirmation letter notifying them that if they believe that their illness or condition will extend beyond 90 days, they can request an extension by communicating with PG&E’s customer contact center. If an extension is requested exceeding 90 days in duration, PG&E will provide an application to the customer. Upon receipt of a completed Vulnerable Customer Application, PG&E will extend the in-person visit privilege for a period of one year from the date of receipt of the application. Customers are required to submit a Vulnerable Customer Application annually if they wish to re-certify as a vulnerable customer. Both the vulnerable customer confirmation letter and Vulnerable Customer Application have been included in this report as Attachment A. Customers can also access www.pge.com to learn about the vulnerable customer identification and can download the Vulnerable Customer Application from the site.

B. Communicate with Customers Regarding their Option to Align their Bill Payment Date with Their Income Cycle Notwithstanding the Date Printed on the Bill.

PG&E will continue its current practice to accommodate customer requests for specific meter read or billing dates on a case-by-case basis, provided that there are no operational obstacles or limitations to prevent such selections. There is very limited capacity over and above

that which is currently utilized on a day-to-day basis. Extensive promotion of the bill payment flexibility will overwhelm the limited additional capacity that exists and may jeopardize the viability of the entire billing system during certain periods of the month.

PG&E will also continue to use its current collection practices and believes that its existing collection timeline provides ample time for customers to pay their bill on any day of his or her choosing during the following month without the need to modify his or her meter read or billing date. PG&E communicates the availability of payment arrangements in various ways that can assist customers who may be experiencing difficulty in paying their bill. If a customer is engaged in an active pay plan, all collection activities are suspended as long as the customer meets their pay plan commitments, thereby eliminating the risk of disconnection. Additionally, PG&E does not assess late payment fees to its customers, so there are no financial penalties for late payments.

C. Language option review directed in Section 3.4.

As directed, PG&E has reviewed the number of language calls that were handled by its Call Centers during 2011. Table 1 below lists the number of calls that PG&E received through its call centers that are in English versus other alternate languages.

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TABLE 1

2011 PG&E Call Center Calls English versus Alternate Language Calls				
Language	# of Calls	% of Total Calls	% Alt. Language Calls	Avg Calls/Hour
English	9,313,547	97.980%	—	1063.190
Spanish	140,855	1.482%	73.347%	16.079
Cantonese	20,989	0.221%	10.929%	2.396
Mandarin	11,514	0.121%	5.996%	1.314
Vietnamese	8,442	0.089%	4.396%	0.964
Korean	1,692	0.018%	0.881%	0.193
Tagalog	431	0.005%	0.224%	0.049
All Other	8,117	0.085%	4.227%	0.927
Sub-Total Alt Language Calls	192,040			
Grand Total Call Center Calls	9,505,587			

PG&E currently provides direct customer service language lines for its Spanish, Cantonese, Mandarin and Vietnamese customers that covers nearly 95% of its alternate language calls received by PG&E call centers in 2011. Language Line Services and Language Service Associates are employed by PG&E and these entities provide language translation assistance in 6,912 languages, including Korean and Tagalog, which are the only remaining languages listed of the six most frequently spoken languages in Senate Bill (SB) 120.

Korean and Tagalog calls represented eighteen-one thousands of a percent (0.018%) and five one thousands of a percent (0.005%), respectively. This equates to an average of only one Korean speaking customer contact through PG&E’s call center every 5.2 hours and one Tagalog speaking customer contact every 20.4 hours. Given that these languages combined represent just over 1% of the language calls and just over two-one hundredth of a percent of the total calls into PG&E’s call center, the numbers do not warrant additional, dedicated lines.

Having dedicated call center reps who can speak Korean or Tagalog available 24/7 during all call center operating hours to handle customer inquiries in these languages would not be a prudent use of PG&E's resources. Given the low historic call volume to PG&E's customer service center from Korean and Tagalog speaking customers, the use of the language translation service for these customers is the most cost effective means to communicate with customers who speak these languages.

Respectfully submitted,

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