

To: Tory Francisco and Kyle DeVine
From: Redacted
Re: PG&E's Comments on the Draft CHANGES Pilot Evaluation Report
Date: August 17, 2012

PG&E appreciates the opportunity to submit comments on the Draft CHANGES Pilot Evaluation Report submitted to the CPUC on August 2, 2012.

Overall comments:

1. CHANGES is supposed to help Limited English Proficient (LEP) customers with billing issues/disputes, and to help them avoid shut-offs.

- (a) Is there a need for this? The Pilot assumes that LEP customers have a high incidence of billing issues to address. It seems that this pilot has the order backwards, and that it is funding in search of a problem, rather than the other way around.
- (b) Is there data to support that LEP customers having a **higher** incidence of billing issues and shut-offs than non-LEP customers? Has anyone tried to analyze the incidence of LEP customers that are shut off (or analyzed language preferences of customers that are shut off, or how many required interpreters?).
- (c) Is there evidence that by simply providing translation service, LEP billing issues/shut off issues are resolved? What about credit counseling?
- (d) Is there evidence that existing translation services employed by IOUs is failing these customers?
- (e) It seems logical that resolving billing issues with the LEP population would be harder due to linguistic and cultural barriers, but are there extraordinary or unusual billing or payment problems? And if so, is the CHANGES program reducing the incidents of these? Also, can they or are they being addressed in other more cost-effective ways internally?

2. The Draft Report does not support the statement that the CHANGES program is necessary and should be expanded.

- (a) There is no comparison to other similar programs throughout the country that would demonstrate and support the need for such a program.
- (b) Just because California has the largest LEP population, does not mean the CHANGES program is necessary. The IOUs have existing mechanisms in place to support LEP customers and there is no evidence to support that these are not successful. The report does not demonstrate that adding CHANGES brings value to ratepayers.

3. Metrics. The Draft Report discusses tracking CARE/ESA/FERA enrollments.

- (a) This is an incorrect metric: It is not the purpose of the CHANGES pilot to enroll customers into these programs. The metric to measure effectiveness should focus on reduction in shut-off and billing issues in this customer class.
- (b) In fact, there is a specific CARE Outreach Contractor program that provides payment for CBOs to outreach and enroll customers in CARE. Many of the participating

COC CBOs are the same as the ones providing CHANGES. Thus, enrolling customers under CHANGES would be double-dipping.

4. The Report does not provide any evaluation of whether or not CHANGES CBOs have helped any customers avoid shut-offs, address billing issues, or solve any other identified customer need.

(a) There are ways to track these items if appropriate information is collected. However, we know from earlier meetings, that the CBOs did not collect information allowing them to track this information. The report does not discuss possible tracking criteria or appropriate data collection at all. The report should at least suggest appropriate metrics and possible methods of tracking them.

(b) It is not appropriate to rate the pilot as successful if it does not track the incidence of successful interventions. It should further break down these successful interventions by category so that the IOUs and Commission can determine that these are cost-effective methods of resolving the identified problems.

5. There is no assessment of whether or not CHANGES CBOs provide adequate coverage of either cultural-linguistic groups in California, or of these communities throughout California. For example, PG&E believes SHE has much more presence in Northern California.

6. Funding

(a) Conclusion on p. 24 states: "CARE has an existing funding line item with an adequate budget to support CHANGES." This is hardly an adequate reason to expend ratepayer funding.

(b) Conclusion on p. 24 states: "As CARE reaches full penetration, CHANGES provides a logical additional service that can be provided to this population." It's inappropriate to state that because we have money available, let's spend it on this program without a demonstrated showing of effectiveness.

(c) The issue that is not adequately addressed is whether or not these services reach and help LEP customers with their bills in ways that the IOUs cannot. This would include assessing whether this outreach is duplicative of other outreach already provided; and whether this outreach is more effective than what may be already provided.

(d) PG&E already works with a network of COCs serving customers in their communities in multiple languages and cultural backgrounds.

7. Report recommends increased funding for a CHANGES Program, based on the number of LEP customers in California.

(a) This is an inadequate mechanism for determining need and level of funding. The need for this service among LEP customers should be determined. The issue is not just how many LEP customers exist or were touched by the program. There is no demonstration that these customers have a need for a service that was provided and was unavailable through other sources.