

PG&E CARE High Usage/Appeals Process Proposal

As directed by Ordering Paragraph 101(b) in D.12-08-044, PG&E is to develop an expedited appeal process for those customers who may believe that they have been wrongfully de-enrolled to allow them the process to submit an appeal of the de-enrollment documenting their concerns and demonstrating their usage as “necessary, basic and legitimate household energy usage.” The proposed de-enrollment appeal process is as follows:

1. Stage 1 - Customers with electric usage above 400% of baseline in their most recent monthly billing cycle will have 45 days to provide a standard income verification document (IRS Transcript of Tax Return or Verification of Non-Filing) and agree to participate in the Energy Savings Assistance (ESA) program – including allowing access to all portions of the metered property for a post-participation inspection by the Central Inspection Program (CIP). Customers who do not respond will be removed from the CARE Program and prohibited from re-enrolling in the CARE Program for 24 months or until compliance with the stated requirements.
2. Stage 2 - Customers who successfully complete Stage 1 will be given a priority referral to the ESA program. Customers who *do not* meet the ESA eligibility requirements (due to prior program participation within the past 10 years, not meeting the three-measure minimum, etc.) will move directly to Stage 3. Customers who *do* meet the ESA eligibility requirements will be given 30 days (or longer depending on contractor availability) to complete their ESA participation/CIP inspection and move to Stage 3. ESA program contractors will be trained to refer these customers to the Medical Baseline program, if applicable. CIP inspectors will be trained to inform the customer of the appeal process and a record of their communication will be noted on the customer’s account for future reference in the event of an appeal. Customers who fail to keep multiple appointments, do not provide access to the metered property, refuse to allow a post-participation quality control inspection, or decline to participate will be removed from the CARE Program and prohibited from re-enrolling for 24 months or until compliance with the stated requirements.
3. Stage 3 - Customers who successfully complete Stage 2 will be notified that, beginning in 90 days, their electric usage will be monitored to ensure it does not exceed 600% of baseline. A customer will be allowed three monthly billing cycles from notification to reduce their monthly electric usage to below 600% of baseline. The notification will include, based on the customer’s baseline territory and end use, an example of the monthly kWh usage that would exceed the 600% of baseline threshold for both summer and winter seasons. The notification will also include energy efficiency tips, information on Medical Baseline, and other resources available to assist the customer to reduce their electric usage.
4. After the conclusion of 90 days following notification and within two years thereafter, if the customer’s electric usage exceeds 600% of baseline in any monthly billing cycle, the customer will be de-enrolled from CARE and barred from the program for 24 months. Customers who believe they have been wrongfully de-enrolled will be allowed to submit an appeal.

5. The expedited appeal process will allow the customer to document their concerns and provide a detailed explanation demonstrating their usage as necessary, basic, and legitimate household energy usage. Some examples include a large number of people in the household or customers with documented and necessary medical equipment which requires and supports the high usage (the customer will be provided an additional opportunity to enroll in the Medical Baseline program). Load information for the entire household will be expected as part of such appeal. Load information includes a description of all equipment utilizing electricity within the household and a detailed description of model numbers and any usage levels available concerning such equipment. For household lighting and other non-continuous equipment, hours of operation for each week should be provided. PG&E will assist the customer in obtaining load information to the extent possible.
6. The utility will review and endeavor to make a determination regarding the appeal within 10 business days. This may include reviewing the customer's account for previous notes, or conducting a field inspection if the customer was not eligible for ESA participation during Stage 2. If the appeal is denied by PG&E, the customer will be advised that they may seek the Commission's assistance by contacting the Energy Division's Director per D.12-08-044 (page 400). If the IOU or Energy Division's Director make the determination that there is reasonable justification demonstrating "necessary, basic and legitimate household energy usage," the customer will be re-enrolled in CARE.
7. To the extent possible, notifications will be accessible to customers with disabilities and to customers without English language proficiency.