

Testimony on the Pacific Gas and Electric Company
General Rate Case Test Year 2014 by the Greenlining Institute
(A.12-11-009 *et al.*)

Prepared Testimony of
Noemí Gallardo
Energy and Telecommunications Policy Fellow

The Greenlining Institute
1918 University Avenue
Berkeley, CA 94704
Telephone: 510 926 4000
Facsimile: 510 926 4010
E-mail: enriqueg@greenlining.org

May 17, 2013

TABLE OF CONTENTS

GREENLINING TESTIMONY, CUSTOMER CARE, LANGUAGE COMPETENCY .. 1

I. PG&E’S Customer Care Policy Does Not Prioritize the Needs of Its LEP Customers 1

 A. PG&E Has Limited In-Language Options to Meet LEP Needs 2

 B. PG&E Does Not Adequately Outreach to LEP Customers, Especially For Safety and Reliability Initiatives 5

 C. Insufficient Spending in Language Services Will Adversely Impact LEP Customers 7

 D. PG&E Must Consider Recruiting and Hiring More Bilingual Workers 8

 E. PG&E Should Pay Fair Compensation to Workers Who Have Bilingual Skills 12

 F. There Is a Lack of Cultural Sensitivity Training 14

 G. PG&E May Not Be Adequately Tracking and Assessing Communication Efforts with LEP Customers 15

 H. Tracking and Assessing Language Services Provided by PG&E is Limited 15

 I. Tracking and Assessing Language Services Provided by Third Party Vendors is Limited 20

STATEMENT OF QUALIFICATIONS OF NOEMÍ GALLARDO 22

Testimony Related to Exh. 5 – Customer Care

GREENLINING TESTIMONY, CUSTOMER CARE, LANGUAGE COMPETENCY

I. PG&E’S Customer Care Policy Does Not Prioritize the Needs of Its LEP Customers.

PG&E must make reputational and cultural gains in order to rebuild its relationships with the communities it serves. Making these gains requires effective communication, including with limited English-proficient (LEP) customers. In a state as diverse as California, where “minorities” are the majority, investing in language services for LEP customers is vital.¹

According to the Governor’s Office, “Later in the fiscal year, for the first time since California became a state, the Hispanic population will become the largest group in California.”² This means that even more California residents will speak Spanish. According to the 2010 US Census, California is home to the country’s largest LEP population.³ About 43 percent of the population speaks a language other than English at home.⁴ More significantly for the purposes of providing language services, more than 6.8 million Californians – over 27 percent of the population – describe themselves as not speaking English very well.⁵

PG&E’s responses reflect the growing population of LEP. The number of calls it handles in other languages demonstrates there is a great demand for language services.

In 2011, PG&E handled 575,567 Spanish calls without the assistance of an interpreter and 177,412 calls in languages other than English with the assistance of interpreters for a total of 752,979 calls handled in languages other than English.⁶

¹ Nina Golgowski , California’s Hispanics to outnumber whites by the end of the year (Jan. 22, 2013) retrieved from <http://webcutlass.com/wp/2013/01/cas-hispanic-population-to-outnumber-whites-by-end-of-2013/>.

² Governor’s Budget Summary – 2013-14, Demographic Information, p. 123 retrieved from <http://www.ebudget.ca.gov/2013-14/pdf/BudgetSummary/DemographicInformation.pdf>.

³ ACS Table B16001, “Language Spoken at Home by Ability to Speak English for the Populations 5 Years and Over” retrieved from <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>.

⁴ See www.quickfacts.census.gov/qfd/states/06000.html.

⁵ ACS Table B16001, “Language Spoken at Home by Ability to Speak English for the Populations 5 Years and Over” retrieved from <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>.

⁶ See PG&E Data Response to Greenlining 001-Q13, included as Attachment A.

In 2011 the Customer Care Organization answered calls from customers in 88 languages.⁷ The large volume of non-English callers continued in 2012, as PG&E received more than 500,000 calls on its dedicated Spanish-language hotline.⁸

The growing demand for in-language customer assistance and the urgency of regaining the community's trust dictate that LEP customers' needs must be taken more seriously. PG&E's policy regarding language services does not seem to prioritize the needs of its LEP customers. As the first utility in California to offer billing in Spanish and Chinese, the two most frequently spoken non-English languages in its service territory and the state at large, PG&E has shown an initial commitment to building a relationship with its LEP customers. PG&E also provides on-demand interpretation services through third party vendors that allow PG&E to provide in-language phone service in more than 100 languages.⁹ However, as Greenlining emphasized in the Protest it filed on December 17, 2012, PG&E must take further steps to regain the trust of the public and ensure it communicates effectively with its growing population of LEP customers.

A. PG&E Has Limited In-Language Options to Meet LEP Needs.

It is unclear whether PG&E provides adequate resources for LEP customers. LEP customers should have equitable access to information, resources and assistance, so that they are no worse off than an English-speaking customer facing disconnection. Right now, there are significant language gaps creating barriers to access for LEP customers. Thus, PG&E must make sure it does as much as possible to inform its LEP customers about the various options available for customers to explore and utilize as needed.

⁷ Exhibit 5 (Customer Care), p. 1-6.

⁸ See PG&E Data Response to Greenlining 001-Q15c, included as Attachment A.

⁹ See PG&E Data Response to Greenlining 01-Q15c, included as Attachment A. PG&E contracts third party vendors – Language Line Services (LLS) and Language Service Associates (LSA) – to reach an interpreter to assist with translation if a bilingual PG&E Contact Center representative is not available.

On page 1-3 of Exhibit 5 (Customer Care), PG&E states that it will “develop more self-service options for those who prefer to use technology to conduct business.” However, these options do not take LEP customers into serious consideration. Current self-service options, which include means to pay bills online and to obtain bill explanations and rate information, in non-English languages are very limited. “PG&E has web self-service primarily in English with FAQ pages in Spanish and Chinese. Other social media is only in English.”¹⁰ For LEP customers who are unable to access the internet, self-service options are even narrower. “Currently PG&E provides self-service for its customers in the phone channel primarily in English and Spanish.”¹¹ Because of the limited options in non-English languages, LEP customers are prevented from doing as much as other customers, and are therefore not receiving the same level of service as English speakers.

PG&E does not have specific strategies or serious plans to develop more self-service options for LEP customers in the future.

Enablement of in-language support is a consideration in PG&E’s technology development. As PG&E develops new online tools and resources and continues to expand current offerings, PG&E will continue to explore the possibility of providing self-service in-language options in addition to the tools and resources already provided for our limited English-proficient customers. Prioritization of these enhancements will be based on customer needs and their preferred channels.¹²

PG&E does not currently have a plan to develop self-service options for customers who do not have internet access at this time. However, PG&E is exploring the possibility of providing applications for tablet and mobile devices. As part of this exploration, PG&E will assess whether customers who do not have internet access have the devices necessary to use these applications.¹³

There is no plan to provide self-service options in other languages, including Chinese and

¹⁰ See PG&E Data Response to Greenlining 001-Q08a, included as Attachment A.

¹¹ See PG&E Data Response to Greenlining 001-Q08b, included as Attachment A.

¹² See PG&E Data Response to Greenlining 002-Q01a, included as Attachment A.

¹³ See PG&E Data Response to Greenlining 002-Q01b, included as Attachment A.

Vietnamese, the two most frequently requested non-English languages besides Spanish.

PG&E's effort to inform its LEP customers about various payment assistance programs in-language is also limited and could be adversely impacting some of PG&E's most vulnerable customers: LEP customers facing disconnection. Some materials containing critical information for LEP customers are translated into multiple languages, while others are not. For example, CARE and FERA applications along with Balanced Payment Program literature are available in Chinese, Spanish, and Vietnamese. The Medical Baseline Application is available in Spanish and Chinese, while the Automatic Payment Service (APS) application is solely available in Spanish.¹⁴ It is unclear why PG&E translated certain material into particular languages and not others.

PG&E should aim to translate documents into as many languages as possible to ensure LEP customers receive the same access to information as English-speaking customers. Certain documents should be translated even sooner due to the criticality of the information for customers. For example, it appears that one of the principal ways PG&E informs its LEP customers about payment assistance programs is with inserts, which are translated into multiple languages but not all languages spoken by LEP customers. These inserts provide critical information to struggling LEP customers about the action they must take to avoid a disconnection.

Non-CARE Residential customers receiving a 15-Day Notice are provided a CARE application as an insert with the notice. Residential customers receiving a 48-Hour Notice also receive a Breathe Easy Solutions™ brochure which provides information about the following: Energy Savings Assistance Program, CARE, FERA, REACH, HEAP, Medical Baseline, Third-Party Notification, Energy Efficiency Rebates,

¹⁴ See PG&E Data Response to Greenlining 001-Q10d, included as Attachment A.

Automatic Payment Service, Balanced Payment Plan, Bill Guaranty, Payment Arrangement, Cooling Centers, SmartAC™, and SmartMeter™.¹⁵

CARE applications are provided in Chinese, Spanish, and Vietnamese while Breathe Easy Solutions (BES) brochures are provided in Spanish, Chinese, Vietnamese, Hmong, Korean and Russian.¹⁶

Customers who speak and read the languages in which the inserts are translated benefit from receiving the information. They learn how to address their immediate bill problem and about other services and programs PG&E offers. However, those who do not speak the languages the inserts come in, or customers who do speak one of those languages but for whom PG&E has not yet figured out that customer's preferred language, will continue uninformed. This is especially true if self-help options are not available in a language they can understand or if they do not know how to reach PG&E by phone.

For these reasons, PG&E should translate these inserts into additional languages. Another concern is that BES brochures include very brief explanations and contact information for the various programs listed in the brochure, making it unclear whether this brochure provides sufficient information for an LEP customer who seeks assistance. It is also unclear on the face of the notice whether customers will have access to language assistance at the number the customer is directed to call.

B. PG&E Does Not Adequately Outreach to LEP Customers, Especially for Safety and Reliability Initiatives.

PG&E is not considering LEP customers in all of its initiatives to improve safety and reliability, critical areas to any customer. Regaining the trust of LEP customers requires more than merely translating certain documents in certain languages and providing telephonic

¹⁵ See PG&E Data Response to Greenlining 001-Q10a, included as Attachment A.

¹⁶ See PG&E Data Response to Greenlining 002-Q03e, included as Attachment A.

interpreting services, especially when it comes to safety and reliability. PG&E indicates it will prioritize its work based on, among other things, “priorities established by [its] customers.”¹⁷

Specifically, PG&E states that it seeks to

...engage [its] customers in discussions regarding the gas and electric safety and reliability work going on in their communities so that they have a clear understanding of the safety measures [PG&E is] taking, the necessity of the work, and the potential impact on their neighborhood.¹⁸

To accomplish this, PG&E says it is “committed to expanding [its] communications and involvement in this area.”¹⁹ PG&E states that it plans to expand community-oriented and local outreach, provide seasonal preparedness messages, and engage with customers through letters, community meetings, on-site construction projects, among other things.²⁰

These are all critical steps in the right direction, however; PG&E is not making a sufficient effort to include the needs of LEP customers in this process.

PG&E aims to make a reasonable effort to provide safety information in the customer’s primary language, with a focus on English, Spanish and Chinese speakers, and with knowledge of the targeted audience. For example, if PG&E knows that a particular geographical area has a large Spanish-speaking population, PG&E makes a reasonable effort to ensure materials are available in-language. The team distributing the information decides exactly which pieces must be translated, as they can best determine the specific needs of their audience. Across PG&E’s service area, PG&E provides a dedicated Spanish-language hotline which received more than 500,000 calls in 2012, as well as an on-demand translation service that allows PG&E to provide in-language phone service in more than 100 languages. PG&E also has safety information available online in both Spanish and Chinese.

Minimal efforts, however, will not suffice when it comes to issues relating to safety and reliability. For example, when PG&E knows that a particular geographical area has a large

¹⁷ Exhibit 5 (Customer Care), p. 1-8.

¹⁸ Exhibit 5 (Customer Care), p. 1-10.

¹⁹ Exhibit 5 (Customer Care), p. 1-10.

²⁰ See PG&E Data Response to Greenlining 001-Q15a, included as Attachment A, citing PG&E’s testimony on p. 7-26, lines 1 – 26.

Spanish-speaking population, PG&E must ensure materials are available in-language rather than merely making a reasonable effort to provide the materials.

C. Insufficient Spending in Language Services Will Adversely Impact LEP Customers.

PG&E should spend more in various areas to ensure effective communication with its LEP customers and help ensure PG&E rebuilds its relationship with the communities it serves. Hiring more bilingual CSRs will improve communication between PG&E and LEP customers. Paying bilingual workers compensation for their language skills would show PG&E values the needs of its LEP customers. Investing in cultural sensitivity training focused on benefitting customers will help ensure PG&E workers address their customers appropriately.

The context of affordability exemplifies the ways in which PG&E's insufficient spending in language services will adversely impact LEP customers. Issues related to affordability require a high standard of language service provision, but it is unclear if PG&E provides an adequate level of information in-language and whether PG&E plans to expand language services in the area of affordability.

PG&E Customer Service Representatives (CSRs) are trained and expected to educate and inform customers of payment options based upon the customer's situation. If the customer is requesting a payment arrangement, then the CSR will also notify the customer about additional programs such as California Alternate Rates for Energy Program (CARE), Family Electric Rate Assistance (FERA) Medical Baseline, Relief for Energy Assistance through Community Help (REACH) and Low Income Home Energy Assistance Program (LIHEAP).²¹

All of this information is critical for customers, especially for low-income customers and those facing economically-challenging transitions.

Determining a customer's "situation" already seems like a difficult process but this type of interaction, one that requires sensitivity and understanding, is even more difficult to do when

²¹See PG&E Data Response to Greenlining 001-Q10a, included as Attachment A.

the CSR cannot speak the same language as the customer and does not have appropriate training to understand cultural differences and pick up on cultural cues. Discussing affordability issues with LEP customers in their preferred language is vastly more effective than the system PG&E has in place now which lacks cultural sensitivity training and bilingual workers.

Addressing LEP customers adequately should be a major priority for PG&E given that interactions over the phone play a large role in building relationships between PG&E and its customers. On page 1-6 of Exhibit 5 (Customer Care), PG&E explains that “Customer Care employees handle an extraordinary number of interactions with customers during all phases of the customer relationship.” In-language communication becomes even more critical for LEP customers who reach out to Customer Care employees for information about pay plans expecting to engage with someone who is prepared to respond in a knowledgeable and eager manner. Based on 2011 numbers, it appears that PG&E receives a significant number of calls about affordability-related issues including pay plans.

PG&E does not have a standard category of calls identified as “affordability.” However, PG&E’s CSRs will discuss Pay Plans with customers who call with affordability concerns. Contact Centers handled approximately 805,354 Pay Plan calls in 2011. General pay plans are handled by general Customer Service Representatives who have received training regarding pay plan guidelines.²²

D. PG&E Must Consider Recruiting and Hiring More Bilingual Workers.

PG&E currently seeks to regain the trust of the public and its customers, but it is not taking sufficient action to improve its relations with LEP customers. Hiring more bilingual workers who could remove language barriers by communicating directly with LEP customers would help PG&E show that it cares about its LEP customers and is committed to meeting their needs. Despite having many LEP customers throughout its service territory who seek in-

²² See PG&E Data Response to Greenlining 001-Q12a, included as Attachment A.

language interaction, PG&E does not prioritize recruiting and hiring bilingual workers as an approach to meet LEP customer needs.

At this time, PG&E's Customer Care Organization including Contact Center Operations does not recruit bilingual workers to handle calls to its Contact Centers or calls to other parts of PG&E from LEP customers.

...

At this time, PG&E Contact Center Operations does not provide incentives to attract bilingual speakers.²³

PG&E does not currently set bilingual skills as a priority when it hires or recruits supervisors for the Contact Centers.²⁴

Even as it considers making the CSR improvements mentioned on pages 2-9 and 2-10 of Exhibit 5 (Customer Care), PG&E does not seem to consider LEP customers in this process. It says, for example, that "PG&E does not have a set percentage or target of bilingual supervisors that it plans to hire as part of the referenced CSR improvements."²⁵

Given California's growing LEP population, PG&E should change its recruitment and hiring policies in a way that prioritizes LEP customer needs so that it can meet the increasing demand for language services. It looks like PG&E might be taking steps in the right direction to improve its recruitment.

PG&E Contact Center Operations is currently working with its partners in IBEW to develop a plan to staff bilingual workers to handle calls. The plan will include elements that will require agreement by both PG&E and the Union to implement.²⁶

This step makes sense considering that the Contact Center receives thousands of calls in languages other than English (752,979 in 2011) and the majority of those in (575,567) in

²³ See PG&E Data Response to Greenlining 002-Q05d,f, included as Attachment A.

²⁴ See PG&E Data Response to Greenlining 002-Q12a, included as Attachment A.

²⁵ See PG&E Data Response to Greenlining 001-Q22, included as Attachment A.

²⁶ See PG&E Data Response to Greenlining 002-Q05c, included as Attachment A.

Spanish.²⁷ Otherwise, it is disconcerting that currently, only 45 Customer Service Representatives can handle these calls directly.²⁸

All 45 bilingual Customer Service Representatives (CSR) in the Contact Centers speak Spanish. PG&E's Contact Centers Operations does not track the number of Chinese speaking employees.

....

Although CCO employees may speak a variety of languages, CCO employees currently handle calls in English and Spanish.²⁹

Because all bilingual CSRs speak Spanish and PG&E limits CSRs bilingual in other languages to use their language skills, many non-Spanish speaking LEP customers do not benefit from speaking with CSRs directly which can be helpful in establishing relationships and enabling the customer to obtain accurate information.

As PG&E starts hiring more bilingual workers, it should clarify the policy guiding its decisions to meet the needs of LEP customers. For example, its recruitment and hiring guidelines could include defined processes for ways to attract competent bilingual workers and ways to help them maintain their skills. Currently, PG&E's policy is unclear. On the one hand, "PG&E does not currently recruit (Contact Center) Customer Care workers based on the quantity of calls received in a particular language other than English."³⁰ However, when asked about recruitment efforts of bilingual workers in particular programs to meet the needs of LEP Customers, PG&E listed various factors it considers, including quantity of calls.

The criterion used by the Contact Centers to determine how many, if any, bilingual workers are needed include but are not limited to the number of calls offered, average handle time (AHT) and call arrival patterns by language. The criterion used by the Contact Centers to determine the languages needed include but are not limited to the number of calls offered and call arrival patterns by language.³¹

²⁷ See PG&E Data Response to Greenlining 001-Q13, included as Attachment A.

²⁸ See PG&E Data Response to Greenlining 002-Q10b, included as Attachment A.

²⁹ See PG&E Data Response to Greenlining 002-Q10b,c,d, included as Attachment A.

³⁰ See PG&E Data Response to Greenlining 001-Q13b, included as Attachment A.

³¹ See PG&E Data Response to Greenlining 002-Q05g,h, included as Attachment A.

To determine how to meet the needs of limited English-proficient customers, including the number of bilingual speakers to hire and languages needed in the future, ES&S will take several factors into consideration, including but not limited to; assessing demographics in PG&E's service territory; identifying customer language preferences; speaking to customer account managers to determine language needs and/or barriers experienced during interactions with customers and the community; assessing customer account manager language skills; evaluating available resources for language interpretation and translation (e.g. PG&E's language line); and other resource options such as increasing bilingual ES&S staff.³²

The policy should be clarified throughout PG&E, not just in the ES&S program, especially as the population of LEP customers grows. Clarifying the policy will help ensure that departments throughout PG&E are aware of the factors that trigger the need to hire bilingual workers. Having a clear policy will speed up the hiring process thereby helping to meet the needs of LEP customers in a more expedited manner and increasing their confidence in PG&E.

To help guide its policy and improve the service it provides to LEP customers, PG&E should consider including data that will inform decisions on whether to recruit and hire more bilingual workers. For example, PG&E says there is some wait time spent by the operator when seeking an interpreter to attend customers who call in and need to be served in a language other than English.³³ Determining the wait time and its impact on the customer could be a factor considered in the assessment process. PG&E should also make more effort to assess language-related services. Although PG&E had the Boston Consulting Group conduct a thorough assessment of PG&E's customer service, it did not include average speed of answer and call abandonment rates for non-English languages.³⁴

Additionally, data from the telephonic interpreting services should be considered to determine whether hiring more bilingual workers could help improve call drops and

³² See PG&E Data Response to Greenlining 001-Q16d, included as Attachment A.

³³ See PG&E Data Response to Greenlining 001-Q20, included as Attachment A.

³⁴ See PG&E Data Response to Greenlining 001-Q19a, included as Attachment A.

abandonment rates. Both of the third-party vendors that provide PG&E’s telephonic interpreting services – Language Line Solutions (LLS) and Language Service Associates (LSA) – provide PG&E information regarding, for example, the average speed of answer by language associated with time spent seeking an interpreter.³⁵

Language Line Solutions (LLS) tracks the number of calls that are lost by language. This can include calls lost due to system disconnects and due to an interpreter being unavailable. Language Service Associates (LSA) tracks the number of calls where an interpreter was unavailable by language, and also tracks the total number of customer disconnects which was 126 in 2011. LSA does not track customer disconnects by language.³⁶

Using data to inform its decisions will enable PG&E to make better decisions about how to meet the needs of its LEP customers.

E. PG&E Should Pay Fair Compensation to Workers Who Have Bilingual Skills.

PG&E is not compensating bilingual workers for their language skills. This is an unfair practice, especially considering how valuable these skills are in building relationships with LEP customers. Not paying workers for their bilingual skills indicates that PG&E is not prioritizing the needs of LEP customers.

Generally, PG&E “does not provide a pay differential for bilingual employees.”³⁷ Even PG&E departments whose work centers on communicating with the public, does not compensate bilingual workers for their language skills. For example, the Contact Centers do not provide any type of pay differential to incentivize bilingual speakers to work at the Contact Centers.³⁸ Other departments have similar policies.

³⁵ See PG&E Data Response to Greenlining 002-Q10h, included as Attachment A.

³⁶ See PG&E Data Response to Greenlining 002-Q10i, included as Attachment A.

³⁷ See PG&E Data Response to Greenlining 001-Q16c, included as Attachment A.

³⁸ See PG&E Data Response to Greenlining 001-Q18d, included as Attachment A.

The target compensation for employees who work with Small and Medium Business customers is based on a market analysis, comparing jobs with similar levels of responsibility using compensation surveys or other data. At this time PG&E does not believe that a pay differential for bilingual workers is required to offer competitive levels of compensation. PG&E does not offer additional compensation for Energy Solutions & Service (ES&S) employees who must use their bilingual skills as part of their job. PG&E'S ES&S Department does not offer any incentives to bilingual applicants.³⁹

PG&E seems to avoid paying for these skills by not requiring its bilingual workers to speak a language other than English.

However, PG&E knows that its bilingual workers, especially those in the Contact Centers, often use their language skills to engage with customers.

While PG&E may have CSRs at the local offices that speak more than one language, their job requirements do not require utilization of any languages other than English. However, many of PG&E's bilingual CSRs in the offices regularly converse with customers in their non-English language (primarily Spanish) if the customer is more comfortable speaking in that language.⁴⁰

PG&E must take into consideration that by using their language skills to address customers directly, bilingual workers help PG&E avoid paying a third-party vendor to provide interpreting services. This seems very unfair because "...customer account managers may utilize their language skills and/or seek other language resources to help communicate with the customer"⁴¹ but will not be compensated even though "PG&E Contact Center Operations considers bilingual skills as a favorable factor for some positions."⁴² The language skills of bilingual workers are a valuable resource for both PG&E and the customers served by these bilingual workers, and they should be compensated fairly for their skills.

³⁹ See PG&E Data Response to Greenlining 002-Q08c,d,e, included as Attachment A.

⁴⁰ See PG&E Data Response to Greenlining 002-Q13a, included as Attachment A.

⁴¹ See PG&E Data Response to Greenlining 001-16d, included as Attachment A.

⁴² See PG&E Data Response to Greenlining 002-Q05i, included as Attachment A.

F. There Is a Lack of Cultural Sensitivity Training

On page 2-9 of Exhibit 5 (Customer Care), PG&E states that it “plans to expand and improve the training that its CSRs receive to better equip them to handle more complex customer calls.” The cost estimated to implement this training is \$1.6 million, but none of it is dedicated to training targeted to meeting LEP customer needs. “PG&E’s 2014 GRC request does not include forecasted dollars for cultural sensitivity training.”⁴³ PG&E has no plans to improve its training either. It will continue relying on its existing programs, which do not address the needs of diverse customers.

As mentioned in PG&E’s response to Greenlining-001 question 8, PG&E’s diversity and inclusion programs continue to expand awareness of the unique differences among individuals and groups through a number of different programs described in Exhibit (PG&E-8) Human Resources Policies Chapter 2. Diversity and Inclusion are an important component of PG&E’s values and included in the list of competencies employees are evaluated on each year.⁴⁴

PG&E does not provide cultural sensitivity training, not even for its Customer Service Representatives (CSRs) who address a broad spectrum of customers on a daily basis.

PG&E does not currently have a formal cultural and sensitivity training effort, however these attributes are included within other training provided to employees throughout the year. Examples of this training include the annual compliance and ethics training required of all employees, which since 2009 has included a diversity component and the Inclusion Leadership Workshop which is mandatory for all supervisors. The Inclusion Leadership Workshop focuses on the ways in which diversity and inclusion benefits PG&E and helps employees to improve their skills so that they can create a more inclusive workplace. PG&E also offers various training tailboards to supervisors so that they can discuss specific diversity and inclusion related topics with their employees.⁴⁵

PG&E’s current attempt to provide cultural sensitivity training to its workers seems beneficial for its internal interactions, but fails to improve interactions with its customers. The policy looks inward and places no focus on customer interaction. Additionally, a policy that merely includes

⁴³ See PG&E Data Response to Greenlining 002-Q11a, included as Attachment A.

⁴⁴ See PG&E Data Response to Greenlining 002-Q11a, included as Attachment A.

⁴⁵ See PG&E Data Response to Greenlining 001-Q28, included as Attachment A.

a few “attributes” on cultural sensitivity will not sufficiently prepare someone to address LEP customer needs.

PG&E does not seem prepared to immediately provide cultural sensitivity training for all of its employees. Rather than shirk from implementing this training, it could take an incremental approach starting with workers whose job require contact with customers, including workers who go out on service calls into customers’ homes and CSRs who speak with customers on a daily basis.

G. PG&E May Not Be Adequately Tracking and Assessing Communication Efforts with LEP Customers.

It is unclear whether PG&E has an effective tracking and assessment process to determine the needs of LEP customers. For example, when discussing complex calls, PG&E said “[it] did not have any language access complaints in 2011.”⁴⁶ It seems highly unlikely that there would not be a single complaint about PG&E’s language services unless this comment solely refers to complaints that were escalated. Most likely this is an indicator that PG&E’s system of seeking and recording input about language services needs altering. PG&E should reconsider the metrics it uses to measure whether services for LEP customers are on par with services provided to English-speaking customers. The metrics should focus on how effectively PG&E is reaching its LEP customers rather than on whether a customer makes a complaint and the number of complaints.

H. Tracking and Assessing Language Services Provided by PG&E is Limited.

It is unclear whether PG&E has a defined strategy for determining the languages into which it should be translating documents such as payment-related material.

⁴⁶ See PG&E Data Response to Greenlining 001-Q21, included as Attachment A.

Languages in which PG&E provides education and other related material about payment options and low-income programs were originally selected based on customer needs determined by Energy Savings Assistance (ESA) Program Managers in consultation with contractors and community agencies performing outreach. More recently, languages were selected based on demographic and market research such as census data regarding predominant languages used by low income households in PG&E's service territory, as well as needs determined in consultation with ESA Program Managers, outreach staff, low income program contractors, and community agencies.⁴⁷

These efforts could be improved by defining the steps it will take more clearly and including the input of LEP customers in the process, instead of using ad hoc measures and relying only on sources other than the LEP customers.

PG&E relies on surveys to obtain customer feedback but LEP customers are often left out of this process because most surveys are not translated into non-English languages.⁴⁸

PG&E must change this because the surveys often provide crucial information about customer need as described below:

PG&E uses a variety of surveys to obtain customer feedback. This feedback is then used to determine where PG&E is not meeting its customers' commitments and priorities. An after call survey is used for customers calling the contact centers. An automated IVR outcall survey is used for a sampling of customers using PG&E's customer service offices and those that have had a field visit by a PG&E representative.⁴⁹

To understand what type of efforts actually work, PG&E must ensure LEP customers participate in assessments, especially when it comes to issues relating to safety and reliability.

PG&E makes a reasonable effort to engage and gather feedback from all customers, including both English and non-English speakers. However, selected surveys on particular outreach plans do include outreach specifically to Spanish and Chinese speakers. PG&E also works closely with its community based organizations through the CARE program to gather input and ensure communications are effective.⁵⁰

⁴⁷ See PG&E Data Response to Greenlining 002-Q03e, included as Attachment A.

⁴⁸ See PG&E Data Response to Greenlining 001-Q14b, included as Attachment A.

⁴⁹ See PG&E Data Response to Greenlining 001-Q14a, included as Attachment A.

⁵⁰ See PG&E Data Response to Greenlining 001-Q15d, included as Attachment A.

To determine which customers participate in the Electric Reliability and Communications Survey and Gas Pipeline Testing Communications Survey, PG&E takes a random sample of residential and commercial customers who have received communications related to electric work and/or pipeline testing work respectively.⁵¹

Although LEP customers may be included in these samples, random samples will not guarantee PG&E receives sufficient information from LEP customers to understand their needs and respond accordingly. Additionally, PG&E has indicated that “the Electric Reliability and Communications Survey and Gas Pipeline Testing Communications Survey are provided in English only” and “PG&E does not have plans to provide these surveys in languages other than English.”⁵² To adequately address these critical needs in an effective and efficient manner, PG&E must provide surveys in languages other than English, even if only in the two non-English languages most frequently spoken in the service territory.

By obtaining more direct input from LEP customers, PG&E can more accurately determine what types of resources, programs and services to provide its growing LEP customer population. Right now PG&E does not seem to obtain adequate direct feedback.

PG&E’s Contact Center Operations does not expressly seek feedback, however, customers may provide feedback about language access needs at any point during a transaction with a PG&E Contact Center Customer Service Representative (CSR).⁵³

This type of informal process for receiving feedback about language access needs will not yield usable results. Tracking and assessment tools can help improve the quality of service PG&E provides to its LEP customers.

Additionally, PG&E does not track the language abilities of its bilingual workers, which seems very inefficient when determining who to hire to fill positions requiring particular language skills.

⁵¹ See PG&E Data Response to Greenlining 001-Q15b, included as Attachment A.

⁵² See PG&E Data Responses to Greenlining 002-Q07a, included as Attachment A.

⁵³ See PG&E Data Response to Greenlining 002-Q10f, included as Attachment A.

PG&E's Contact Center Operations (CCO) does not track languages spoken by employees.⁵⁴

Additionally, of the 239 employees providing face-to-face customer service, mentioned on page 3-4 of Exhibit 5 (Customer Care), PG&E does not know how many are bilingual.

While PG&E may have customer service representatives (CSRs) at the local offices that speak more than one language, their job requirements do not require utilization of any languages other than English. As a result, PG&E does not have data on the number of bilingual CSRs at the local offices.⁵⁵

Although CCO employees may speak a variety of languages, CCO employees currently handle calls in English and Spanish.⁵⁶

All 45 bilingual Customer Service Representatives (CSR) in the Contact Centers speak Spanish. PG&E's Contact Centers Operations does not track the number of Chinese speaking employees. The 45 bilingual workers referenced in the prior response are skilled to handle calls in English and Spanish. Calls in other languages are handled by PG&E's third party vendors LLS and LSA.⁵⁷

PG&E should also track which of its employees are bilingual, in which offices they are located, how many customers require language services in person, over the phone, and by other means to determine how many, if any, bilingual workers are needed at particular offices. Tracking this information could also help PG&E compare and assess the impact on customer satisfaction of having bilingual workers available to communicate with LEP customers.

Currently, it seems like the lack of information to assess services is adversely impacting LEP customers. For example:

If a non-English speaking customer goes to a PG&E Customer Service office and the customer service representative (CSR) does not speak their language, the customer is referred to the lobby phone that connects the customer to the Contact Centers. The contact center CSR can then handle the call using our language service vendor if necessary to respond to the customer.⁵⁸

⁵⁴ See PG&E Data Response to Greenlining 002-Q10d, included as Attachment A.

⁵⁵ See PG&E Data Response to Greenlining 001-Q23, included as Attachment A.

⁵⁶ See PG&E Data Response to Greenlining 002-Q10d, included as Attachment A.

⁵⁷ See PG&E Data Response to Greenlining 002-Q10b,c, included as Attachment A.

⁵⁸ See PG&E Data Response to Greenlining 001-Q23, included as Attachment A.

This quick fix may meet the customer's need, but not necessarily in an adequate manner. It defeats the purpose for a customer to go to an office, seeking face-to-face interaction only to be directed to a phone. This type of circumstance is especially burdensome for customers living in remote areas and without immediate access to transportation, among other things. Tracking data about LEP needs would enable PG&E to understand the extent of the need in a particular language at a particular office, which in turn helps the office determine if there is a particular language spoken frequently by its customers that requires having a bilingual worker there that can speak directly with those customers; whether the office should hire more bilingual workers; and if so how many to hire.

Additionally, PG&E lacks a formal process to assess the language skills of workers who provide language services to LEP customers or to obtain input about the quality of the services.

PG&E does not have a formal process for assessing customer account manager language skills. PG&E is aware of the number of ES&S account managers who are fluent and proficient in Spanish, Chinese, Vietnamese, Tagalog, among other languages; where these employees are located within PG&E's service territory; and whether their language skills have been utilized to communicate with customers. Customers may provide feedback through the surveys outlined as part of PG&E's response to Greenlining-002-Q06a. ES&S Supervisors may also contact customers directly to obtain feedback from customers regarding their experience with a particular customer account manager as part of the performance evaluation process for customer facing ES&S employees.⁵⁹

Having formal processes to determine the level of quality provided to LEP customers could help PG&E understand how to best meet the needs of its customers. Additionally, this information would enable PG&E to make better decisions for hiring purposes because assessments would reveal which workers are communicating effectively and which ones are not.

⁵⁹ See PG&E Data Response to Greenlining 002-Q09c, included as Attachment A.

I. Tracking and Assessing Language Services Provided by Third Party Vendors is Limited.

It appears that PG&E does not proactively assess the quality of language services provided by the third parties it hires. Not taking steps to ensure the quality of services could adversely impact LEP customers who rely on the information provided by these third parties. For example, PG&E does not directly assess the qualifications of the telephonic interpreters it utilizes through third-party vendors mentioned on page 2-7 of Exhibit 5 (Customer Care) and it does not appear that their third-party vendors require state certification.⁶⁰

Additionally, PG&E describes its Customer Insights & Preference Management Project as a “customer interaction hub that will drive personalized customer interactions.” “PG&E will use customer insights and preference management to provide consistent outreach through PG&E’s external partners.”⁶¹ These external partners provide outreach and messaging in non-English languages, however, it is unclear whether PG&E assesses the quality of language services provided.

Outreach conducted by external partners such as Varolli, SoundBite and Broadnet is currently provided in English and Spanish.

SoundBite provides outreach for the Energy Savings Assistance (ESA) Program and the California Alternative Rates for Energy (CARE) Program in Spanish.

Varolli provides Demand Response event notifications to residential customers who participate in the SmartRate Program in Spanish.

Broadnet is an on-demand recording system which has conducted outbound calls to customers in Spanish. Some examples of outreach conducted by Broadnet in Spanish include notifications on Hydrostatic testing, Gas Meter Appointments and SmartMeter.⁶²

⁶⁰ See PG&E Data Response to Greenlining 001-Q18c, included as Attachment A.

⁶¹ Exhibit 5 (Customer Care), p. 9-5.

⁶² See PG&E Data Response to Greenlining 002-Q17a, included as Attachment A.

It is also not clear whether PG&E influenced the choices of languages in which the outreach is conducted and whether there will be ongoing assessments to determine which, if any new languages should be added.

Outreach conducted in Spanish through SoundBite was determined based on the population of customers within PG&E's service area who may be eligible for the ESA and CARE programs.

The languages selected to conduct Demand Response event notifications through Varolli for residential customers on the SmartRate program was based on PG&E's initial marketing efforts of the program in Kern County which PG&E determined had a large Spanish speaking population.

The languages selected for Broadnet outreach is determined by internal groups at PG&E who require Broadnet resources to conduct out-bound calls to customers for a given initiative or notification.⁶³

Overall these services and outreach seem to have the potential to benefit LEP customers. The main concern would be that PG&E is not taking responsibility to ensure the language services provided by these third party vendors are up to par.

⁶³ See PG&E Data Response to Greenlining 002-Q17b, included as Attachment A.

STATEMENT OF QUALIFICATIONS OF NOEMÍ GALLARDO

My name is Noemí Gallardo and my business address is the Greenlining Institute, 1918 University Avenue, Second Floor, Berkeley, California, 94704. My position at Greenlining is Energy and Telecommunications Policy Fellow. My work at Greenlining has focused on proceedings impacting limited English-proficient and low-income consumers as well as utility general rate cases and marketing, education and outreach proceedings. Prior to Greenlining, I established an interpreting agency in Ventura County, California called Voz Interpreting through which I provided interpretation and translation services in the Spanish language as a Certified Administrative Hearings Interpreter. My license number is 100757.

My education includes a Bachelor of Arts degree in Spanish and International Studies with a concentration in business management from Pepperdine University (1999), a Masters in Public Policy with a concentration in Social and Urban Policy from the University of Southern California (2007), and a law degree with a concentration in local government and civil litigation from UC Hastings, College of the Law (2012).

My publications include the following language access-related articles: *Language Access Laws and Legal Issues: A Local Official's Guide* (2011), published by the Institute for Local Government, *A Local Official's Guide to Language Access Laws* (2012) published by the Hastings Race and Poverty Law Journal, and *Enhancing Language Access Services for LEP Court Users: A Review of Effective Language Access Practices in California's Superior Courts* (2013) published by the Administrative Office of the Courts and sponsored by the State Justice Institute.