
January 12, 2024

ADVICE 138-W
(U 338-W)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
WATER DIVISION

SUBJECT: Modifications to the California Alternate Rates for Energy
Applications and Recertification Letters

PURPOSE

The purpose of this advice letter is to advise the Water Division of Southern California Edison Company's (SCE) recent advice letter submitted to the Energy Division to update its California Alternate Rates for Energy (CARE) and Family Energy Rate Assistance (FERA) programs' associated forms (e.g., applications and recertification letters) to update a section for applicants to include their annual income information.¹ Water customers on Santa Catalina Island will encounter these same changes when enrolling in CARE.

BACKGROUND

Assembly Bill 205 requires the California Public Utilities Commission (Commission or CPUC) to adopt an income graduated fixed charge (IGFC) for electric residential customers by July 1, 2024.² In August of 2023, the presiding administrative law judge issued in electric Rulemaking (R.) 22-07-005, directing parties to "focus their briefs on issues necessary to authorize the first version of IGFCs, which will reduce volumetric rates and rely on existing income verification processes used by the Commission for the California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance Program (FERA) programs."³ Subsequently, the Joint Investor Owned Utilities (IOUs) submitted their proposal to use income data provided during electric CARE enrollment and verification to create three brackets for the IGFC, non-CARE/FERA customers, CARE/FERA customers, and very low-income CARE/FERA customers.

¹ SCE Advice 259-G/5191-E, submitted January 12, 2024.

² Assembly Bill 205 was introduced by Assembly Member Ting and approved on June 30, 2022.

³ Rulemaking 22-07-005, August 23, 2023, p. 4.

Customers have two paths to attesting eligibility for the CARE program—they may either provide their household income level or attest to their enrollment in one of several programs (referred to as categorical eligibility programs).⁴ After review of CARE program information, SCE has determined that it has income information for approximately 60 percent of CARE/FERA customers.

While the final decision has not yet been issued for IGFC, SCE is proposing to update the CARE/FERA applications as soon as possible to encourage customers to provide their income data, even if they qualify categorically for CARE or FERA. Given the Commission's direction to focus on utilizing existing processes to determine IGFC brackets, changing the CARE/FERA application now will allow SCE to collect more income information organically. Additionally, SCE plans to send a separate communication to CARE- and FERA-enrolled customers who have not provided income information in advance of the IGFC implementation in 2025. Updating the application to collect more income information now reduces customer burden because fewer customers will have to take additional action later to provide their income information and qualify for the lowest level of the fixed charge.

SCE is proposing to update the CARE/FERA applications to remove language directing customers to “skip” providing their income if they indicate they are already categorically eligible, so that SCE has as much income data as possible for electric CARE/FERA customers. In place of the removed language, SCE is adding language that confirms income information is not required but could make the electric customer eligible for additional discounts in the future if it is provided. Customers can still choose to skip the income section, as providing income information remains voluntary for customers otherwise qualified through participation in qualifying categorical programs.

Additionally, references to “annual” income have been underlined, bolded, and capitalized in an effort to alleviate any confusion with providing monthly vs annual income. This will help decrease application processing time.

Finally, the Declaration section on the CARE/FERA application is updated and streamlined across all application channels. The updated Declaration section includes a website location where detailed terms and conditions will be housed. There is also new language in the Declaration section informing customers that information provided on the application (i.e., income) could be utilized to offer electric customers additional programs or discounts (e.g., IGFC).

Other channels of the CARE/FERA applications will be updated (SCE.com website and automated voice response messages) as they become available.

No cost information is required for this advice filing.

⁴ There are nine third-party programs that have been approved by the Commission as categorical eligibility programs to be used as a proxy for income eligibility.

This advice filing will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule.

TIER DESIGNATION

Pursuant to General Order (GO) 96-B, Water Industry Rule 5.2, this advice letter is submitted with a Tier 2 designation.

EFFECTIVE DATE

This advice letter will become effective on February 12, 2024, the 30th calendar day after the date submitted.

NOTICE

Anyone wishing to protest this advice letter may do so only electronically. Protests must be received no later than 20 days after the date of this advice letter. Protests should be submitted to the CPUC Energy Division at:

Director, Water Division
California Public Utilities Commission
E-mail: water_division@cpuc.ca.gov

In addition, protests and all other correspondence regarding this advice letter should also be sent electronically to the attention of:

Connor Flanigan
Managing Director, State Regulatory Operations
Southern California Edison Company
E-mail: AdviceTariffManager@sce.com

and

Adam Smith
Director, State Regulatory Relations
c/o Karyn Gansecki
Southern California Edison Company
E-mail: Karyn.Gansecki@sce.com

There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

In accordance with Section 4 of GO 96-B, SCE is serving copies of this advice filing to SCE's Water GO 96-B service list. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-6838. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

To view other SCE advice letters submitted to the Commission, log on to SCE's web site at <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

For questions, please contact Robert Rojas at (626) 302-0274 or by electronic mail at Robert.1.Rojas@sce.com.

Southern California Edison Company

/s/ Connor Flanigan
Connor Flanigan

CF:rr:bvs

**CALIFORNIA PUBLIC UTILITIES COMMISSION
DIVISION OF WATER AND AUDITS**

Advice Letter Cover Sheet

Utility Name: Southern CA Edison

Date Mailed to Service List: Jun. 10, 2022

CPUC Utility #: WTC 338

Protest Deadline (20th Day): Feb. 1, 2024

Advice Letter #: 138-W

Review Deadline (30th Day): Feb. 12, 2024

Tier 1 2 3 Compliance

Requested Effective Date: Feb. 12, 2024

Authorization

Rate Impact: \$

Description: Modifications to the California Alternate Rates for Energy Applications and Recertification Letters

The protest or response deadline for this advice letter is 20 days from the date that this advice letter was mailed to the service list. Please see the "Response or Protest" section in the advice letter for more information.

Utility Contact: Darrah Morgan

Utility Contact 2: Brent Valencia Santos

Phone: (626) 302-2086

Phone 2: (626) 302-4747

Email: advicetariffmanager@sce.com

Email 2: advicetariffmanager@sce.com

DWA Contact: Tariff Unit

Phone: (415) 703-1133

Email: Water.Division@cpuc.ca.gov

DWA USE ONLY

<u>DATE</u>	<u>STAFF</u>	<u>COMMENTS</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

APPROVED

WITHDRAWN

REJECTED

Signature: _____

Comments: _____

Date: _____

**CALIFORNIA PUBLIC UTILITIES COMMISSION
DIVISION OF WATER AND AUDITS**

Advice Letter Cover Sheet

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Date: _____
