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February 4, 2022

**ADVICE 4710-E**  
**(Southern California Edison - U 338-E)**

**Advice 10-E**  
**(Apple Valley Choice Energy)**

**Advice 30E**  
**(Central Coast Community Energy)**

**Advice 0015-E**  
**(Clean Power Alliance of Southern California)**

**Advice 19-E**  
**(Lancaster Choice Energy)**

**Advice 14-E**  
**(Pico Rivera Innovative Municipal Energy)**

**Advice 4-E**  
**(Pomona Choice Energy)**

**Advice 8-E**  
**(Rancho Mirage Energy Authority)**

**Advice 12-E**  
**(San Jacinto Power)**

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA  
ENERGY DIVISION

**SUBJECT:** Southern California Edison Company's Percentage of Income  
Payment Plan Pilot and Joint Proposal for Community Choice  
Aggregator Participation

Pursuant to the California Public Utilities Commission (Commission or CPUC) Decision (D.)21-10-012, Ordering Paragraphs (OP) 2 and 3, Southern California Edison Company (SCE) submits this Tier 3 Advice Letter (AL), in part on behalf of the Community Choice Aggregators (CCAs) that have notified SCE of their intent to participate in the Percentage of Income Payment Plan (PIPP) pilot.<sup>1</sup> SCE submits on

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<sup>1</sup> CCAs that have notified SCE of their intent to participate in the PIPP pilot are: Apple Valley Choice Energy (AVCE), Central Coast Community Energy (CCCE), Clean Power Alliance of Southern California (CPA), Lancaster Choice Energy (LCE), Pico Rivera Innovative Municipal Energy (PRIME), Pomona Choice Energy (POME), Rancho Mirage Energy Authority (RMEA), and San Jacinto Power (SJP).

behalf of itself only Discussion Sections I, II, IV, and V; the Section on Proposed Tariff Changes; and Attachment A. SCE submits on behalf of itself and the CCAs that have notified SCE of their intent to participate in the PIPP pilot all other sections of this Tier 3 AL. The proposed revisions to SCE's tariffs to implement the PIPP pilot, as set forth herein, are listed on Attachment A and are attached hereto.

## **PURPOSE**

The purpose of this AL is to provide the implementation parameters for SCE's PIPP pilot and to establish Preliminary Statement Part N.71, the *Percentage of Income Payment Plan Memorandum Account (PIPPMA)*, and Preliminary Statement Part HHHH, the *Percentage of Income Payment Plan Balancing Account (PIPPBA)*. In addition, SCE's Rule 9, *Rendering and Payment of Bills*, is modified to include the PIPP pilot provision.

## **BACKGROUND**

On July 20, 2018, the Commission issued Rulemaking (R.)18-07-005 to implement the requirements of Senate Bill 598 to address "disconnection rates across California's electric and gas investor-owned utilities by adopting policies and rules that reduce disconnections and improve reconnection processes and outcomes for disconnected customers."<sup>2</sup>

On June 16, 2020, the Commission issued D.20-06-003 that concluded Phase 1 of R.18-07-005, adopting rules designed to reduce the number of residential customer disconnections, including creating the Arrearage Management Plan (AMP) program, which provides bill debt forgiveness for residential customers who make on-time bill payments over a fixed time period.<sup>3</sup> D.20-06-003 also established a rate-setting phase for R.18-07-005 to consider a PIPP program to reduce residential disconnections of electric and gas service. Parties provided opening and reply comments in response to a series of Administrative Law Judge (ALJ) rulings on PIPP related questions issued on

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<sup>2</sup> R.18-07-005, Order Instituting Rulemaking (OIR), p. 1.

<sup>3</sup> SCE submitted Advice 4287-E on September 9, 2020 to establish the AMP program. On December 18, 2020, Resolution E-5114 was issued approving, with modifications, Advice 4287-E.

November 24, 2020,<sup>4</sup> December 7, 2020,<sup>5</sup> January 28, 2021,<sup>6</sup> April 20, 2021,<sup>7</sup> and June 17, 2021.<sup>8</sup>

On October 11, 2021, the Commission issued D.21-10-012 (the Decision) that ordered each investor-owned utility (IOU) to submit a Tier 3 advice letter within 120 days of the effective date of the Decision to implement the PIPP pilot.<sup>9</sup> The Decision requires that the PIPP pilot be designed to cap a participating customer's monthly utility bill payment amount at a certain percentage of the customer's household income. This monthly bill cap will be updated annually to reflect current income guidelines concurrent with the California Alternate Rates for Energy (CARE) program income guideline updates.<sup>10</sup> Furthermore, the Decision also established the PIPP Working Group (WG) to advise on CCA implementation, identification of eligible high recurring disconnection rate zip codes, outreach, pilot implementation, the evaluation plan, and the long-term program design including funding sources for the program.<sup>11</sup> In December 2021 and January 2022, the PIPP WG<sup>12</sup> met four times<sup>13</sup> to discuss various PIPP pilot implementation and timing matters.

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<sup>4</sup> Administrative Law Judge Kelly's Email Ruling Requesting Responses from Parties to Seven Questions, issued November 24, 2020.

<sup>5</sup> Administrative Law Judge Kelly's Email Ruling Requiring Responses to Three Questions Concerning Energy Use and the Percentage of Income Payment Plan, issued December 7, 2020.

<sup>6</sup> Administrative Law Judge Kelly's Email Ruling Requesting Comments on Four Questions Concerning the Percentage of Income Payment Plan, issued January 28, 2021.

<sup>7</sup> Administrative Law Judge Wang's Email Ruling Requesting Implementation and Coordination with Existing Programs, issued April 20, 2021.

<sup>8</sup> Administrative Law Judge Wang's Email Ruling Requesting Comments on Percentage of Income Payment Plan Pilot Straw Proposal, issued June 17, 2021.

<sup>9</sup> D.21-10-012, OP 2.

<sup>10</sup> D.21-10-012, p. 42.

<sup>11</sup> D.21-10-012, OP 12; Attachment A, p. 7.

<sup>12</sup> The PIPP WG meetings included representatives from the CPUC, California Public Advocates (PAO), The Utility Reform Network (TURN), Utility Consumers' Action Network (UCAN), Center for Accessible Technology (CforAT), Pacific Gas and Electric Company (PG&E), SCE, Southern California Gas Company (SoCalGas), San Diego Gas & Electric Company (SDG&E), California Community Choice Association (CalCCA), San Diego Community Power, Clean Power Alliance, California Choice Energy Authority, Central Coast Community Energy, Valley Clean Energy, East Bay Community Energy, Redwood Energy, Marin Clean Energy, Calpine Solutions, GridX, Sacramento Municipal Utility District, Golden State Water Company, and San Francisco Water Power Sewer.

<sup>13</sup> PIPP WG meetings were held on December 6, 2021, December 20, 2021, January 10, 2022, and January 24, 2022.

Once this AL is approved by the Commission, SCE will begin PIPP pilot marketing, education, outreach and enrollment within 45 days<sup>14</sup> and will target enrolling 2,000 customers during the first six months of the PIPP pilot.<sup>15</sup>

## **DISCUSSION**

### **I. PIPP Pilot Details**

#### **A. Participation Cap and Duration**

Participation in the PIPP pilots is capped at 15,000 customers for all IOUs.<sup>16</sup> The total number of participants that are eligible to enroll in SCE's PIPP pilot is 4,000.<sup>17</sup> The pilot will include a cap for each participating CCA, which is based on the CCA's projected share of customers in SCE's service territory,<sup>18</sup> detailed below in Section III.C.

The duration of the PIPP pilot will be 48 months,<sup>19</sup> and the goal of the PIPP pilot will be to evaluate whether a PIPP program can (i) reduce the number of low-income households at risk of disconnection, (ii) encourage participation in energy savings and energy management programs, (iii) increase access to essential levels of service, and (iv) control program costs.<sup>20</sup>

#### **B. Monthly Bill Cap**

As required by the Decision, SCE's PIPP pilot will cap a participating customer's monthly bill amount for both electricity and gas at four percent (4%) of the customer's monthly household income based on current Federal Poverty Guidelines (FPG) for a three-person household.<sup>21</sup> For households with monthly incomes between 0-100 percent of the FPG, the four percent bill cap will be applied using 50 percent of the FPG as the reference income.<sup>22</sup> For households with monthly incomes between 101-200 percent of the FPG, the four percent bill cap will be applied using 150 percent of the FPG as the reference monthly household income.<sup>23</sup> The monthly bill cap will be applied to the participating customer's bill prior to calculating any third-party taxes, charges, and fees.<sup>24</sup>

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<sup>14</sup> D.21-10-012, OP 4.

<sup>15</sup> D.21-10-012, Attachment A, p. 1.

<sup>16</sup> D.21-10-012, Attachment A, p. 1.

<sup>17</sup> D.21-10-012, Attachment A, p. 1.

<sup>18</sup> D.21-10-012, Attachment A, p. 3.

<sup>19</sup> D.21-10-012, Attachment A, p. 3.

<sup>20</sup> D.21-10-012, p. 12.

<sup>21</sup> D.21-10-012, p. 42.

<sup>22</sup> D.21-10-012, p. 43.

<sup>23</sup> D.21-10-012, p. 43.

<sup>24</sup> D.21-10-012, p. 34.

The bill cap will be updated annually concurrently with CARE program and income guideline updates.<sup>25</sup> However, the bill cap percentage will not be adjusted during the first six months after the PIPP pilots are launched.<sup>26</sup> The table below provides the adopted PIPP monthly bill caps based on the 2020 FPG.<sup>27, 28</sup>

	Customers with incomes between 0-100% of FPG	Customers with incomes between 101-200% of FPG
Reference income	50% of FPG	150% of FPG
Monthly income for household of 3	\$905	\$2,745 <sup>29</sup>
Cap based on 4% of monthly income (before taxes and fees)	\$37	\$109

### C. Electric and Gas Split

The Decision requires the IOUs to include in this advice letter a proposal for splitting the monthly bill cap for electric and gas service, regardless of whether a PIPP pilot customer is served by (1) a single utility that offers both electric and gas service and is participating in the PIPP pilot, (2) two utilities that offer either electric or gas service and are both participating in the PIPP pilot, or (3) a single utility that is participating in the PIPP pilot and a municipal utility that is not participating in the PIPP pilot.<sup>30</sup> Based on SCE's analysis of the eligible pilot population, SCE anticipates offering its PIPP pilot to electric customers only.

In the PIPP WG, the joint IOUs<sup>31</sup> proposed a statewide electric and gas bill cap split of 75 percent electric to 25 percent gas, which is equivalent to three percent (3%) electric to one percent (1%) gas of the total four percent (4%) monthly bill cap, for all customers for the duration of the PIPP pilot. Although the Decision states to provide a proposal for splitting each bill cap for "two different groups of climate zones,"<sup>32</sup> the joint IOUs' simplified proposal of a single split across all climate zones will result in reduced

<sup>25</sup> D.21-10-012, p. 42.

<sup>26</sup> D.21-10-012, Attachment A, p. 5.

<sup>27</sup> See 2020 Poverty Guidelines - <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines/prior-hhs-poverty-guidelines-federal-register-references/2020-poverty-guidelines>.

<sup>28</sup> D.21-10-012, pp. 42-43.

<sup>29</sup> SCE believes that this value is \$2,715 instead of \$2,745 but transcribed the table exactly as was provided in D.21-10-012. There is no impact to the calculation for the lower PIPP bill cap being \$109.

<sup>30</sup> D.21-10-012, pp. 48-49.

<sup>31</sup> The joint IOUs are PG&E, SDG&E, SoCalGas, and SCE.

<sup>32</sup> D.21-10-012, Attachment A, p. 5. The Decision also provides that the split be based on the average annualized CARE customer bill for electricity and gas in two categories of climate zones. See *id.*

customer confusion and increased operational efficiencies. Additionally, there was support for the joint IOUs' proposed approach and no WG participant voiced opposition to this approach during the WG meetings. Each IOU's analysis resulted in minimal variation of the electric to gas percentage split and given the limited pilot size, the resultant difference to each IOU's cash flow is also minimal (e.g., each one percent difference in the electric and gas split equals \$0.37 or \$1.09 per month per customer, which equals \$1,480 or \$4,360 per month for a total of 4,000 PIPP pilot participants in SCE's service territory).<sup>33</sup> The additional benefit to using a single statewide electric and gas bill split is that it simplifies the pilot for customers who are served by two separate IOUs for their electric and gas bills. The predominant overlap has traditionally occurred between SCE and SoCalGas, however, there may also be overlap between other IOUs in California.

SCE recommends that the evaluation required by D.21-10-012, consider including analysis of the electric and gas split by season, climate zone or zip codes, and potentially examine whether the entire bill cap may be applied to single fuel customers (e.g., all electric).

The table below lists how the electric to gas split will be applied to the monthly bill caps. For additional ease of customer communications, the PIPP WG was also supportive of the amounts being rounded to the nearest dollar. This results in a \$28 electric and \$9 gas split for the lower PIPP bill cap and a \$82 electric and \$27 gas split for the higher bill cap amount.

	Customers with incomes between 0-100% of FPG		Customers with incomes between 101-200% of FPG	
Cap for electric and gas based on 4% of monthly income	\$37		\$109	
	75% Electric	25% Gas	75% Electric	25% Gas
Individual IOU PIPP bill cap (before taxes and fees)	\$28	\$9	\$82	\$27

#### D. Customer Eligibility

To be eligible to participate in SCE's PIPP pilot, customers must be enrolled in CARE and (i) have experienced two or more disconnections during the 12 months prior to the disconnections moratorium,<sup>34</sup> or (ii) be located in a zip code with the highest rates of

<sup>33</sup> See SCE and SoCalGas PIPP Pilot Workshop #3 presentation at January 10, 2022 PIPP WG.

<sup>34</sup> The 12-month period prior to the disconnections moratorium is March 2019 through February 2020.

recurring disconnections prior to the disconnections moratorium.<sup>35</sup> Excluded from PIPP pilot participation are master-metered operators and their sub-metered tenants, direct access customers, customers who do not have a SmartMeter, customers who are enrolled in any other pilot, and customers enrolled in net energy metering rates.<sup>36</sup> If a customer is enrolled in another pilot or program and is otherwise eligible to participate in the PIPP pilot, SCE may provide the customer with an option to be removed from the other program or pilot in order to be eligible to participate in the PIPP pilot. The costs associated with administering this process will be included in the PIPPMA.

Pursuant to the Decision, each utility must propose, in its consolidated Tier 3 PIPP implementation advice letter, the eligible zip codes with the highest rates of recurring disconnections prior to the disconnections moratorium based on the utility's data.<sup>37</sup> As such, SCE proposes to use the following 18<sup>38</sup> zip codes for customer eligibility in order to create a PIPP pilot that is reflective of SCE's overall service area.

#	ZIP Code	City
1.	90201	Bell / Bell Gardens / Cudahy
2.	90706	Bellflower
3.	90805	North Long Beach
4.	91730	Rancho Cucamonga
5.	92301	Adelanto
6.	92335	Fontana
7.	92345	Hesperia / Lugo
8.	92376	Rialto
9.	92401	San Bernardino

#	ZIP Code	City
10.	92404	San Bernardino
11.	92405	San Bernardino
12.	92410	San Bernardino
13.	92551	Moreno Valley
14.	92553	Moreno Valley
15.	93250	McFarland / Vinland / Calico
16.	93501	Mojave / Fleta / Bissel
17.	93505	California City
18.	93550	Palmdale / Vincent

The above zip codes reflect, based on SCE's analysis, the top 10 zip codes with the highest number of disconnections for residential customers between March 2019 – February 2020, and the top 10 zip codes with the highest rate of disconnections for residential customers between March 2019 – February 2020. Because this historical data is reflective of SCE's internal practice in which SCE's system automatically prioritized the customer accounts eligible for disconnections based on operational or policy-related issues (e.g., limiting the number of CARE customers that may be disconnected), using only the highest number of CARE customer disconnections may not truly reflect where customers may be most impacted by risk of disconnection. As a

<sup>35</sup> D.21-10-012, Attachment A, p.1

<sup>36</sup> D.21-10-012, Attachment A, p. 1.

<sup>37</sup> D.21-10-012, p. 25.

<sup>38</sup> SCE initially proposed a total of 19 zip codes at the December 6, 2021 PIPP WG. However, SCE inadvertently counted the zip code 92553 (Moreno Valley) twice, therefore, the total number of proposed zip codes should have been 18.

result, SCE used the total residential disconnections in determining the zip codes with the highest number of disconnections.

Additionally, using only the top 10 zip codes with the highest number of absolute disconnections would result in a PIPP pilot that focuses on zip codes with larger populations. As such, SCE added the top 10 zip codes with the highest rate of disconnections to allow for inclusion of less populated zip codes (e.g., Mojave, McFarland, California City). This results in a total of 18 zip codes as there were two zip codes that appeared on both lists.<sup>39</sup> SCE estimates there are approximately 152,000 customers within the 18 proposed zip codes who are eligible for the PIPP pilot.<sup>40</sup> Additionally, SCE estimates there are approximately 8,000 CARE customers who have experienced two or more disconnections during the 12 months prior to the disconnections moratorium, and approximately 119,000 eligible customers<sup>41</sup> in the zip codes proposed by the participating CCAs (detailed below in Section III.D), bringing the total number of customers who are eligible for the PIPP pilot to approximately 279,000.<sup>42</sup>

Each IOU discussed the analysis used to develop its respective targeted zip codes at the PIPP WG, and although each IOU's definition of targeted zip codes varied slightly and there were differences in the total number of targeted zip codes, all IOUs were similar in that the target zip codes represent locations where customers have previously been impacted by disconnections.

#### E. Customer Income Verification and Participation in the PIPP Pilot

In accordance with the Decision, the following income verification and recertification provisions apply to the PIPP pilot:<sup>43</sup>

- PIPP pilot participants must comply with CARE income verification and recertification rules;
- If the customer is removed from the CARE program, the customer will also be removed from the PIPP pilot;
- Customers who request a bill cap for 0-100% of FPG must prove their income within 90 days or they will be moved to the bill cap for participants at 101-200% of FPG;
- Customers who request a bill cap for 101-200% of FPG will be subject to the existing CARE post-enrollment verification processes;
- If a participating PIPP pilot customer has verified their income for CARE

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<sup>39</sup> The San Bernardino zip code of 92404 and the Moreno Valley zip code of 92553 appeared on both lists (i.e., top 10 zip codes with highest number of disconnections and top 10 zip codes with highest rate of disconnections).

<sup>40</sup> Based on the number of Residential and CARE enrolled customers as of October 31, 2021.

<sup>41</sup> Based on the number of Residential and CARE enrolled customers as of October 31, 2021.

<sup>42</sup> Some of the customers who were disconnected two or more times also reside within the zip codes proposed by SCE.

<sup>43</sup> D.21-10-012, Attachment A, p. 2.



- within the past two years, the customer will not be required to verify their income.
- SCE will contract with community-based organizations (CBO) to provide upfront income verification services for the PIPP pilot during pilot intake and enrollment if the CBO currently provides upfront income verification services for CARE and/or Energy Savings Assistance Program (ESAP) (further described below in Section II.B.2); and
- SCE's PIPP pilot will rely on the CARE income recertification process and will not have separate income recertification requirements.

Additionally, if a participating PIPP pilot customer moves within SCE's or a participating CCA's service area and establishes service at the new location within 30 days of terminating service at the previous location, SCE will automatically transfer the customer's PIPP pilot enrollment status to their new location.<sup>44</sup> In certain instances, SCE foresees that this could result in a CCA or SCE exceeding their PIPP pilot participation allocation (e.g., if a customer moves from a location with bundled service to a participating CCA service area or vice-versa). SCE proposes that in these instances, the customer be allowed to continue on the PIPP pilot and that the individual CCA or SCE be allowed to exceed participation limits. There would be no impact to the total 4,000 SCE PIPP pilot participation cap. Should a customer be removed from the pilot as a result of their removal from CARE, SCE would fill the vacancy based on the appropriate waitlist to realign the individual participation caps.

However, if the customer does not establish service at the new location within 30 days, or if the customer's new location is not within SCE's or a participating CCA's service area, the customer will be removed from the PIPP pilot – consistent with the Decision's direction that the customer should be removed and should receive notice of how to apply to participate in the PIPP pilot in other service territories or their current service territory.<sup>45</sup> SCE would fill the vacancy using the appropriate waitlist. SCE would ask the removed customer to contact their new CCA or IOU to inquire regarding availability for the PIPP pilot<sup>46</sup> as SCE would not necessarily be aware of any changes to the customer's financial status, potential availability of the PIPP pilot in the customer's new location, and who the relevant CCAs is for that location.

## **II. PIPP Marketing, Education and Outreach (ME&O) Plan**

### **A. ME&O Strategy**

The Decision requires that all eligible customers be offered the opportunity to enroll in the PIPP pilot.<sup>47</sup> As described above, SCE's PIPP pilot is capped at 4,000 participants and the total number of customers that SCE estimates are eligible for the PIPP pilot is approximately 279,000. Due to the high volume of eligible customers as compared the

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<sup>44</sup> D.21-10-012, p. 27.

<sup>45</sup> D.21-10-012, Attachment A, p. 2.

<sup>46</sup> D.21-10-012, p. 27.

<sup>47</sup> D.21-10-012, Attachment A, p. 6.

total number of customers who can be enrolled in the PIPP pilot, SCE proposes to perform controlled, targeted outreach that is based on each customer segment (i.e., CCA customer, top 18 zip codes, customer with multiple disconnections) to reduce the total number of eligible customers that express interest in enrolling in the PIPP pilot but are unable to participate due to the participation cap. To mitigate the potential for frustrating interested eligible customers who are unable to participate due to the pilot being fully subscribed, SCE will complete this outreach in phases, by selecting a random sample of PIPP eligible customers for each phase, and will provide interested eligible customers with an opportunity to enroll in the PIPP pilot. Subsequent outreach phases may be performed to remaining eligible customers subject to enrollment availability under the PIPP pilot participation cap.

Additionally, the Decision requires that the IOUs offer to enroll eligible customers in the PIPP pilot before disconnecting a customer.<sup>48</sup> One way of implementing this requirement is for SCE to offer the PIPP pilot to all eligible customers who call SCE regarding collections activity, until the pilot is full. However, SCE expressed concerns with the PIPP WG regarding unintended consequences that may arise with this implementation, given the high volume of anticipated calls that would lead to pilot enrollment consisting mostly of such callers. Based on potential eligibility, SCE's analysis suggests up to 350 customers per day may be enrolled in the pilot solely via collection-related calls, resulting in maximum enrollment in as little as 11 days.<sup>49</sup> As explained below, such a result could create a negative customer experience and run counter to the Decision's other marketing directives, and increase overall pilot costs that are borne by all customers. Perhaps most significantly, pilot enrollment of mostly participants who call in regarding collections activity could skew the pilot sample, making it difficult to apply pilot findings to a larger CARE population as intended. Including a broader CARE population using multiple enrollment channels is critical to informing a larger scale PIPP program.

First, with respect to the customer experience and the Decision's other marketing directives, the Decision orders the IOUs to contract with community-based organizations (CBO) to conduct outreach, intake, and enrollment for the PIPP pilot<sup>50</sup> as well as perform general outreach for eligible customers.<sup>51</sup> The outreach done by CBOs and other marketing efforts will *begin*, at the earliest, the same day PIPP enrollment opens, at which time eligible customers may already be calling SCE to discuss collections issues. Contracting with CBOs, as explained in Section II.B.2, takes time.

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<sup>48</sup> D.21-10-012, p. 60, requirement 'f'.

<sup>49</sup> Once collections activity resumes, SCE anticipates approximately 10,000 phone calls daily to its Customer Contact Center. These calls are predominantly residential customers and approximately one-third of SCE's residential customer base is enrolled in CARE. Thus, a conservative estimate of anticipated CARE customer calls related to collections would be 2,500 per day. With more than one in seven CARE customers estimated to be eligible for PIPP, if SCE were to offer PIPP enrollment to all such callers who are PIPP eligible, approximately 350 CARE customers may be enrolled in the PIPP pilot on a daily basis.

<sup>50</sup> D.21-10-012, p. 59.

<sup>51</sup> D.21-10-012, p. 60.

As does conducting general outreach through mass mailing efforts, as explained in Section II.B.5. If SCE initiates offers to all eligible callers starting on day one of the pilot, and enrolls up to 350 PIPP customers per day, by the time other eligible customers receive and consider general outreach or make contact with a CBO, the pilot may be at or near capacity. This is particularly likely for some of the participating CCAs that have smaller participation caps. This raises two concerns. First, SCE is concerned a significant number of interested eligible customers will be frustrated as they are turned away and told the pilot is no longer available. Second, if few spots are available for CBO outreach and enrollment, CBOs may be disincentivized since their pay for performance compensation is based on how many customers they enroll. SCE seeks to avoid a situation where a CBO has invested time contracting with SCE but ultimately is unable to enroll a sufficient number of customers to justify its time establishing the contract and learning about the pilot. This could also compromise pilot learnings regarding what marketing channels, including CBOs, are effective in reaching the eligible customer population.

Second, to offer the pilot to all eligible customers who call regarding collections activity will require the need for extensive and broad training for all Energy Advisors in SCE's Customer Contact Center (CCC) and could potentially result in increased administrative costs for the pilot. Furthermore, tracking the participation cap across so many Energy Advisors would also require real-time or near real-time tracking of the participation cap to halt enrollment once the cap is reached. Because any future expansion of the PIPP pilot is not expected to have a participation cap, any processes or systems created to enable this would not be reused in the future and would not generate any learnings that would be applicable to the PIPP as a program.

Finally, and perhaps most significantly, offering the pilot to all eligible customers calling about collections activity will also interfere with the evaluator's ability to inform the potential expansion of the PIPP pilot to a full program. To the extent participants primarily represent this unique customer group who may already have significant arrears and be exhibiting bill payment issues, they will not reflect the broader CARE population which may be the intended recipients of the larger, expanded program,<sup>52</sup> thereby compromising SCE's ability to understand the value of the bill caps for CARE customers as a whole. Hence, the PIPP pilot's overrepresentation of customers in arrears will not provide stakeholders with critical insights regarding the pilot's impact on the larger group of customers it is expected to assist. Likewise, it will not appropriately inform the potential costs to other customers in the event the PIPP pilot is expanded to the larger CARE population.

Nonetheless, SCE recognizes that the Decision orders IOUs to offer to enroll eligible customers in the PIPP before disconnecting a customer, and appreciates the feedback received from WG participants on this issue. However, in light of the discussion above, SCE proposes to implement this directive by limiting the number of spots that will be

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<sup>52</sup> Based on SCE's December 2021 monthly disconnection report, less than 30 percent of CARE customers have outstanding arrears.

offered to eligible PIPP pilot customers that contact SCE's CCC to discuss their collections activity. SCE proposes that the limit be 20 percent of SCE's total participation cap (exclusive of the participating CCA enrollment caps), for spots to be offered in this way. That is, SCE would offer the PIPP pilot to eligible customers that contact the Customer Contact Center to discuss their collections activity, up to the 20 percent cap. Once that cap is full, SCE's Energy Advisors would cease offering the PIPP pilot to eligible customers who call in. SCE believes this approach (1) accomplishes the Decision's intent regarding the purpose of the pilot, (2) addresses concerns raised by the WG participants to offer the pilot to customers who are facing disconnection and would benefit from reduced bills, (3) allow for consistency with the Decision's marketing directives by also enrolling customers reached through CBOs and general outreach, and (4) improve the potential value and reliability of the evaluation results.

## B. Implementation and Community Outreach

### 1. PIPP Customer Waitlist

The PIPP WG discussed the ways in which the IOUs could maintain the PIPP pilot participation caps<sup>53</sup> and meet the enrollment targets<sup>54</sup> established by the Decision<sup>55</sup> while accounting for the estimated attrition that could occur.

Using the overall CARE attrition rate from 2019 as an indicator, SCE estimates that its PIPP pilot will lose approximately 23 percent, or 900 participants, per year and will therefore need approximately 8,000 customers over the PIPP pilot period to maintain its 4,000 PIPP participation cap. In the PIPP WG, the IOUs proposed to establish a waitlist of interested eligible customers to participate in the PIPP pilot in the event participating PIPP customers are removed from the pilot. This waitlist will allow the IOUs to have an available pool of customers to participate in the PIPP pilot, manage the participation caps for each participating CCA, and concentrate their marketing and outreach efforts. The PIPP WG did not oppose this proposal and agreed that each IOU would detail its proposed PIPP waitlist process in its respective advice letter. As such, SCE proposes the following parameters for its PIPP pilot waitlist process:

- SCE will enroll eligible customers in the PIPP pilot up to the targeted PIPP pilot participant caps for SCE and each CCA (described further in Section III.C) and notify the customer of their PIPP pilot enrollment (e.g., SCE will enroll the first 786 eligible customers who applied in the Clean Power Alliance territory).
- SCE will then place any remaining eligible customers who applied on the PIPP

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<sup>53</sup> The PIPP pilot participation cap is 4,000 for SCE, 5,000 for PG&E, 5,000 for SoCalGas, and 1,000 for SDG&E.

<sup>54</sup> The target enrollment level within the first 6-months of the pilot is 2,000 for SCE, 2,500 for PG&E, 2,500 for SoCalGas, and 500 for SDG&E.

<sup>55</sup> D.21-10-012, Attachment A, p. 1.

Waitlist for their respective participant cap, and notify the customer that they have been placed on the PIPP waitlist (e.g., SCE will place the 787th eligible customer, and beyond, in the Clean Power Alliance territory on a waitlist in case any attrition occurs in that territory).

- SCE will periodically (will likely be quarterly) check PIPP enrollment levels in each territory and determine how much attrition has occurred.
- SCE will enroll the next eligible customer on the waitlist for the target area and notify the customer of their PIPP enrollment.

## 2. Community Based Organization (CBO) Engagement and Compensation

Pursuant to the Decision, SCE will contract with CBOs that serve eligible high recurring disconnection rate zip codes and who currently conduct outreach for Energy Savings Assistance Program (ESAP) and/or Low-Income Home Energy Assistance Program (LIHEAP) to conduct outreach, intake and enrollment for the PIPP pilot.<sup>56</sup> CBOs that currently conduct income verification for ESAP will also conduct income verification at enrollment for the PIPP pilot.<sup>57</sup> The Decision separately provides that utilities will contract with CBOs to provide upfront income verification services for PIPP pilots during pilot intake and enrollment if such community-based organizations currently provide upfront income verification services for CARE and/or ESAP.<sup>58</sup>

To implement these requirements, SCE will contract with certain non-profit CBOs that serve PIPP target zip codes and that have existing relationships with SCE – i.e., non-profit ESAP contractors and CARE capitation agencies – to participate in outreach, intake, and enrollment for the PIPP pilot. SCE will not contract with LIHEAP providers for the PIPP pilot as SCE does not currently have contracts with them. SCE will also contract with certain non-profit ESAP contractors who currently conduct income verification for ESAP to also conduct income verification for PIPP. SCE does not have any CBOs that conduct income verification for CARE.

SCE would not necessarily contract with all such CBOs; rather, SCE will select CBOs that have experience with other program offering(s), such as CARE, ESAP, AMP, or LIHEAP. SCE will utilize a flat fee CBO compensation structure for each enrollment and income verification of PIPP participants that is comparable to that of the CARE, FERA, and ESA programs. Additionally, because SCE's PIPP pilot participation is capped at 4,000 customers, SCE will also provide enrollment caps to each CBO and will work with CBOs to manage continued PIPP pilot enrollments.

The Decision also requires that each IOU's ME&O plan include informing customers of the PIPP opportunity when conducting outreach for CARE, ESAP, AMP, or other

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<sup>56</sup> D.21-10-012, pp. 59-60, requirement 'a'.

<sup>57</sup> D.21-10-012, pp. 59-60, requirement 'a'.

<sup>58</sup> D.21-10-012, p. 21, requirement 'vi'.

payment plans.<sup>59</sup> To do this, SCE plans to have the selected CBOs disseminate information on the PIPP pilot, including when those CBOs conduct outreach for CARE and ESAP. SCE plans to use only CBOs for this effort because of the limited number of pilot participation spots. SCE intends to provide these CBOs with factsheets to help these organizations understand the eligibility requirements and enrollment process for the PIPP pilot.

### 3. Webpages

In accordance with the Decision,<sup>60</sup> SCE will maintain a frequently asked questions section on SCE's website that includes an explanation of the PIPP pilot and eligibility requirements. All web-based content will be compliant with Web Content Accessibility Guidelines (WCAG) and will be available in English, Spanish, Korean, Chinese, and Vietnamese. To comply with the Decision's requirement to allow eligible customers the opportunity to enroll in PIPP when checking their account online, SCE's PIPP pilot website will provide eligible customers with an opportunity to complete an application for the PIPP pilot.<sup>61</sup>

### 4. Customer Contact Center

CCC representatives are currently available to speak with and provide information to customers seeking financial assistance. To comply with the Decision's requirement to allow eligible customers the opportunity to enroll in PIPP when communicating with a customer service representative, CCC representatives will assist eligible customers who respond to SCE's targeted mail and email outreach with the PIPP enrollment process.<sup>62</sup> CCC representatives will also offer to enroll eligible customers who contact the CCC to discuss their collections activity in the PIPP pilot provided there is availability within SCE's proposed cap for this population of eligible customers.<sup>63</sup> After eligibility has been verified and the customer has either been enrolled in the PIPP pilot or placed on the waitlist, CCC representatives will also provide ongoing support to customers that are enrolled in the PIPP pilot.<sup>64</sup>

### 5. Direct Marketing

The Decision requires that an IOU's ME&O plan include offering all eligible customers the opportunity to enroll in the program, including by an informational communication that directs customers to the designated CBO to receive more information.<sup>65</sup> The communication should be available in languages appropriate for eligible high recurring

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<sup>59</sup> D.21-10-012, p. 60, requirement 'c'.

<sup>60</sup> D.21-10-012, p. 60, requirement 'd'.

<sup>61</sup> D.21-10-012, p. 60, requirement 'g'.

<sup>62</sup> D.21-10-012, p. 60, requirement 'g'.

<sup>63</sup> See Section II.A for SCE's proposal to limit the number of PIPP pilot enrollment spots to customers that contact the CCC to discuss their collections activity.

<sup>64</sup> D.21-10-012, p. 60, requirement 'e'.

<sup>65</sup> D.21-10-012, p. 60, requirement 'h'.

disconnection rate zip codes, as identified by the utility, the contracted CBOs, or the PIPP working group.<sup>66</sup> SCE will perform targeted mail and email communications to all eligible PIPP eligible customers. Communications will be in both English and Spanish, which are the appropriate languages identified by SCE and proposed during the WG for the eligible zip codes that are referenced above in Section I.D. The communications will inform customers where they can find more information on SCE's PIPP pilot, by including the CCC's phone number and a link to SCE's PIPP pilot website. SCE's PIPP pilot website will also include a list of contracted CBOs that eligible customers may contact to receive more information on the PIPP pilot.<sup>67</sup> These communications will also extend an opportunity to enroll in the PIPP pilot (pending eligibility verification) or be placed on the PIPP pilot waitlist online or by calling the CCC.

### III. CCA Participation

#### A. CCA Eligibility

Pursuant to the Decision, CCAs in SCE's territory may participate in SCE's PIPP pilot provided the CCA is participating in the AMP or has served notice of its intent to participate in the AMP in accordance with Resolution E-5114 as of the effective date of the Decision.<sup>68</sup> CCAs that opt to participate in SCE's PIPP pilot must (i) notify SCE (with a copy to the service list of the Disconnections Rulemaking, R.18-07-005) within 30 days of the effective date of the Decision, (ii) participate in the PIPP WG, and (iii) jointly submit with SCE a consolidated Tier 3 advice letter within 120 days of the Decision to propose a targeted enrollment level, eligible high disconnection zip codes, a marketing, education, and outreach plan, and a proposed budget.<sup>69</sup> SCE will administer pilot enrollment, income verification, and billing.<sup>70</sup>

The CCAs listed below have provided notice to SCE of their intent to participate in the PIPP pilot and meet the other criteria set forth by the Decision. As such, in addition to the eligibility requirements outlined in Section II.A, customers enrolled in CCA service from any of the CCAs listed below are eligible to participate in the PIPP pilot.

- Apple Valley Choice Energy (AVCE)
- Clean Power Alliance of Southern California (CPA)
- Lancaster Choice Energy (LCE)
- Pico Rivera Innovative Municipal Energy (PRIME)

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<sup>66</sup> D.21-10-012, p. 60, requirement 'h'.

<sup>67</sup> D.21-10-012, p. 60, requirement 'h'.

<sup>68</sup> D.21-10-012, p. 31, provision 'i'.

<sup>69</sup> D.21-10-012, p. 31, provision 'iv'.

<sup>70</sup> D.21-10-012, p. 31, provision 'iii'.

- Pomona Choice Energy (POME)
- Rancho Mirage Energy Authority (RMEA)
- San Jacinto Power (SJP)

#### B. Central Coast Community Energy (CCCE)

Central Coast Community Energy (CCCE) launched CCA service in SCE's territory on October 1, 2021, and the Decision's effective date is October 7, 2021. CCCE submitted to SCE an intent to participate in SCE's PIPP pilot (dated October 22, 2021) on November 5, 2021; however, CCCE did not serve its intent to participate in SCE's AMP as of the effective date of the Decision, which was only about a week after CCCE launched CCA service. Given (1) the short timeframe between the date CCCE launched its CCA service in SCE's territory and the effective date of the Decision, (2) that CCCE has met all other requirements for a CCA to participate in the PIPP pilot, and (3) that since its launch CCCE has served intent to participate in AMP (dated December 10, 2021) on December 13, 2021, and is currently participating in AMP, SCE and CCCE request a waiver for CCCE of the requirement that a PIPP-participating CCA must have served intent to participate in AMP as of the effective date of the Decision, and request the Commission allow CCCE to participate in SCE's PIPP pilot.

#### C. CCA PIPP Pilot Participation Cap

The Decision requires that the CCA pilot participation target must be proportional to the utility's participation cap (based on the CCA's projected share of customers in the utility's service territory) and shall count towards the utility's participation cap.<sup>71</sup>

SCE determined the PIPP pilot participation caps for each CCA based on the number of total residential households in a CCA's and SCE's joint service area.<sup>72</sup> SCE and the participating CCAs have agreed to the following PIPP pilot participant caps for SCE and each CCA, as well as the target number of customers that will be included in SCE's proposed PIPP pilot customer waitlist.<sup>73</sup> While the number of residential households can vary over time, SCE proposes that the pilot participant caps and waitlist targets be fixed for the duration of the pilot for operational ease.

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<sup>71</sup> D.21-10-012, pp. 31-32, provision 'v'.

<sup>72</sup> Residential accounts may fluctuate over time. SCE used data as of October 31, 2021.

<sup>73</sup> See Section II.B for SCE's proposed PIPP pilot customer waitlist.



<b>Provider</b>	<b>Residential Households<sup>74</sup></b>	<b>% of Residential Households</b>	<b>PIPP Participant Cap</b>	<b>PIPP Waitlist</b>
SCE	3,389,178	76.4%	3,054	3,054
AVCE	23,096	0.5%	21	21
CCCE <sup>75</sup>	31,172	0.7%	28	28
CPA	871,662	19.6%	786	786
LCE	45,852	1.0%	41	41
PRIME	15,182	0.3%	14	14
POME	35,764	0.8%	32	32
RMEA	12,890	0.3%	12	12
SJP	12,840	0.3%	12	12
Total	4,437,636	100%	4,000	4,000

#### D. CCA Zip Codes for PIPP Pilot Customer Eligibility

The Decision allows the CCAs to propose eligible high recurring disconnection rate zip codes within the CCA's service territory regardless of whether the utility proposes the same high disconnection rate zip codes.<sup>76</sup> The Decision states that the PIPP WG process will advise on identification of eligible high disconnection rate zip codes.<sup>77</sup> Provided below is each participating CCA's proposal for eligible high recurring disconnection rate zip codes within the CCA's service territory.

##### 1. Apple Valley Choice Energy (AVCE)

AVCE proposes to include 92307 and 92308 (Apple Valley). In reviewing the historical disconnection data provided by SCE, these represent the correct zip codes for Apple Valley.

##### 2. Central Coast Community Energy (CCCE)

CCCE proposes to include zip code 93111 (Santa Barbara) based on its high percentage of qualified customers in both CARE and disconnections categories as well as including portions of unincorporated Santa Barbara County.

<sup>74</sup> Excludes territories of non-participating CCAs (1.7 percent or 77,000 of residential households).

<sup>75</sup> Pending CPUC approval of SCE and CCCE's request to waive the requirement for CCCE to serve its intent to participate in SCE's AMP as of the effective date of the Decision as further explained in Section III.B.

<sup>76</sup> D.21-10-012, p. 32.

<sup>77</sup> D.21-10-012, p. 68.

### 3. Clean Power Alliance of Southern California (CPA)

CPA proposes to include zip codes 90250 (Hawthorne), 90022 (Commerce/East Los Angeles), 93033 (Oxnard), and 90723 (Paramount). CPA selected these zip codes based on the number of two or more disconnects and the highest number of CARE customers.

### 4. Lancaster Choice Energy (LCE)

LCE proposes to include 93534, 93535, and 93536 (Lancaster). In reviewing the historical disconnection data provided by SCE, these represent the correct zip codes for Lancaster.

### 5. Pico Rivera Innovative Municipal Energy (PRIME)

PRIME proposes to include 90660 (Pico Rivera). In reviewing the historical disconnection data provided by SCE, this represents the correct zip code for Pico Rivera.

### 6. Pomona Choice Energy (POME)

POME proposes to include 91709 (Chino Hills), 91766, 91767, and 91768 (Pomona). In reviewing the historical disconnection data provided by SCE, these represent the correct zip codes for Pomona.

### 7. Rancho Mirage Energy Authority (RMEA)

RMEA proposes to include 92270 (Rancho Mirage). In reviewing the historical disconnection data provided by SCE, this represents the correct zip code for Rancho Mirage.

### 8. San Jacinto Power (SJP)

SJP proposes to include 92582, and 92583 (San Jacinto). In reviewing the historical disconnection data provided by SCE, these represent the correct zip codes for San Jacinto.

## E. CCA/SCE Cost Recovery and PIPP Bill Split

SCE and the CCAs that have agreed to participate in the PIPP pilot propose to split the PIPP bill amount equally (e.g., a PIPP customer with a \$28 PIPP bill would owe \$14 to SCE and \$14 to the relevant CCA). The delta between what the CCA requested to be billed and the CCA's share of the PIPP bill cap<sup>78</sup> would be included in the PIPP subsidy

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<sup>78</sup> \$14 for PIPP customers between 0-100 percent of FPG and \$41 for PIPP customers between 101-200 percent of FPG.

amount to be recorded into the PIPPBA. In compliance with the Decision, SCE will remit the generation portion of the electric subsidy costs to the CCA at a frequency no less than a monthly basis.<sup>79</sup> For the duration of the PIPP pilot, SCE proposes to remit the bill subsidy amounts to the CCAs within a week of the bill being created. As such, the CCAs would not receive additional cost recovery through the balancing account at a later date. This allows for the CCAs to receive funds upfront, while not requiring SCE to update its system in a limited timeframe to account for PIPP.

SCE expects that remittance for amounts paid by customers would occur daily as part of SCE's normal remittance process to the CCA. In the event a PIPP pilot customer makes a partial payment, SCE will follow its established partial payment allocation process, informally known as the "zig-zag approach," to alternate partial payments between the CCA and SCE based on the payment posting priority.

#### F. Reporting of PIPP Related Data to CCAs

SCE currently provides CCAs in its service area a weekly report (All-Customer List) that includes a list of all service accounts within a CCA's jurisdiction.<sup>80</sup> To comply with the Decision's requirement that the utility provide sufficient data to each participating CCA in weekly reports to facilitate CCA billing of pilot participants,<sup>81</sup> SCE will add a new data element in the All-Customer List that identifies CCA customers enrolled in the PIPP pilot.

#### G. New or Expanding CCAs

SCE's bundled customers participating in the PIPP Pilot who are subsequently enrolled into a CCA that is new or is expanding in SCE's territory may continue to be enrolled in the PIPP pilot provided that the new or expanding CCA agrees to participate in the AMP and the PIPP pilot. However, if the new or expanding CCA elects not to participate in the AMP and PIPP pilot, and the customer does not elect to opt out of CCA service, the PIPP pilot customer will be removed from the PIPP pilot. In the event that a new or expanding CCA elects not to participate in the PIPP pilot, SCE will coordinate with that CCA to communicate to any potentially impacted PIPP pilot customers.

#### H. CCA Marketing and Outreach Plan

The Decision requires that participating CCAs propose a marketing and outreach plan in this joint advice letter.<sup>82</sup> Due to the small participation cap, all of the participating CCAs have elected not to implement their own marketing and outreach plans and will instead

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<sup>79</sup> D.21-10-012, p. 31, provision 'ii'.

<sup>80</sup> See SCE Tariff Books > Rules > SCE Rule 23, Community Choice Aggregation > Section C.3.b (Sheet 10): <https://www.sce.com/regulatory/tariff-books>.

<sup>81</sup> D.21-10-012, p. 31, provision 'iii'.

<sup>82</sup> D.21-10-012, p. 31.

defer to SCE's proposed marketing and outreach plan, as proposed in Section II, to target eligible CCA customers.

#### I. CCA PIPP Pilot Budget

The Decision requires the participating CCAs to include a proposed budget in this joint advice letter.<sup>83</sup> Due to the small participation cap, all of the participating CCAs have elected not to propose their own budget and therefore defer to SCE's proposed PIPP pilot budget.

### IV. Estimated PIPP Pilot Costs and Cost Recovery Proposal

#### A. Updated Estimated Costs for PIPP Pilot

<b>Budget Item</b>	<b>Estimated Cost Over Life of the Pilot</b>
Customer Bill Subsidy	\$768,000 to \$11,136,000
Administrative and Implementation <ul style="list-style-type: none"> <li>• Program Administration (1.2 FTEs)</li> <li>• Billing Operations (4 – 13 FTEs)</li> <li>• Income Verification Processing</li> </ul>	\$581,000 \$1,180,432 \$200,000
Marketing and Outreach to Pilot Customers	\$250,000
Measurement and Evaluation	\$350,000 to \$500,000
<b>Total</b>	<b>\$3,329,432 to \$13,847,432</b>

#### 1. Operational Impacts

SCE will initially implement the pilot manually. In particular, the enrollment and monthly billing will be processed manually until automation can be set up in SCE's customer billing system. SCE estimates that four (4) full time equivalent (FTEs) are required to process the monthly billing and payment process for the 4,000 participating customers. SCE also estimates up to nine (9) FTEs are required to implement and operationalize the manual billing process, which will include process development and training. As such, the billing estimate in the table above includes setup costs of \$13,552 and annual recurring costs of \$291,720. Because the pilot is new, SCE may need to adjust staffing needs and estimates accordingly as the pilot is implemented. SCE estimates \$250,000 will be needed for marketing and outreach, which will include sending direct mail marketing materials to eligible customers and developing the PIPP website. Development of the PIPP website will include translating web content into the identified languages (discussed further in Section II.B.5) and creating an online application form for the PIPP pilot (discussed further in Section II.B.3).

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<sup>83</sup> D.21-10-012, p. 31.

## 2. Updated Estimated PIPP Bill Subsidy

SCE estimates that the PIPP subsidy will be between \$0.2 million to \$2.8 million annually or \$0.8 million to \$11 million when multiplied by the four-year pilot for SCE's 4,000 PIPP pilot customers. These estimates are based on an average monthly bill of \$86,<sup>84</sup> and the electric portion of the bill subsidy of \$4 to \$58. This equates to an annual subsidy of \$48 to \$696 per customer on the PIPP pilot. As SCE's estimate does not account for differences in individual customer usage or potential changes to customer energy usage behavior as a result of the pilot, the actual bill subsidy could differ from the initial estimate.

	<b>Customers with incomes between 0-100% of FPG</b>	<b>Customers with incomes between 101-200% of FPG</b>	<b>Formula</b>
Average Monthly Customer Bill	\$86	\$86	<i>A</i>
Electric Bill Cap	\$28	\$82	<i>B</i>
Estimated Monthly Bill Subsidy per Customer	\$58	\$4	<i>C=A-B</i>
Estimated Annual Bill Subsidy per Customer	\$696	\$48	<i>D=Cx12</i>
Estimated Total Annual Subsidy <sup>85</sup>	\$2,784,000	\$192,000	<i>E=Dx4,000</i>
Estimated Total Subsidy over Life of PIPP Pilot	\$11,136,000	\$768,000	<i>=E*4</i>

## B. Establishment of the PIPP Pilot Balancing Account and Memorandum Account

Pursuant to OP 2 of the Decision, SCE will establish the Percentage of Income Payment Plan Memorandum Account (PIPPMA) and the Percentage of Income Payment Plan Balancing Account (PIPPBA).

### 1. PIPP Subsidies Recorded in Two-Way PIPP Balancing Account (PIPPBA)

<sup>84</sup> Average (mean) monthly bill for SCE Residential customers in 2019. Actual monthly bills will fluctuate due to other factors such as seasonality, changes in customer energy usage, or customers' behaviors such as working from home.

<sup>85</sup> Assumes all 4,000 customers in pilot fall into same income category to provide a range for estimated pilot bill subsidy cost.

Pursuant to OP 10 of the Decision, SCE will record the PIPP subsidies in a new two-way balancing account, consistent with the recovery of CARE bill subsidies. The PIPP subsidies should be either (a) the difference between the bill cap and the actual bill, or (b) zero, if the bill is lower than the bill cap. The PIPP subsidies include amounts forgiven for charges to bundled service and departing load customers, including participating CCA generation-related charges. Additionally, because only CARE enrolled customers may be enrolled in the PIPP pilot, the PIPP discount will be determined net of the CARE discount – that is, the PIPP discount will be considered to be the discounted amount in excess of the CARE discount.

The December 31 balance in the PIPPBA will transfer annually to the Public Purpose Programs Adjustment Mechanism (PPPAM), for recovery from customers via Public Purpose Program Charge (PPPC) rate levels. The transferred amount will be allocated to customer classes using the currently-effective functional revenue allocation factors adopted for the Public Purpose Programs (PPP) charge in the most recent General Rate Case Phase 2, and recovered from all customers through the PPPC.

## 2. Incremental Administrative Costs Recorded to PIPP Memorandum Account (PIPPMA)

Pursuant to OP 11 of the Decision, SCE will record all administrative costs in the PIPPMA. The Decision does not authorize specific administrative cost budgets; therefore, SCE will record all incremental administrative costs of the PIPP pilot in the new PIPPMA, which will make the recorded costs subject to a reasonableness review by the CPUC before they can be recovered from customers.<sup>86</sup> SCE's proportional share of the costs of the third-party facilitator and the evaluation contractor will also be considered administrative costs and will also be recorded in the PIPMA.

## V. Evaluation

Among other objectives and research questions noted in the Decision, the evaluation will examine whether a PIPP program reduces the risk of low-income customers being disconnected. Pilot implementation requirements and timing constraints do not support an optimal evaluation design which may limit the ability of the results to be generalized to a broader CARE population. SCE may recommend prioritizing and potentially adjusting research questions to ensure the most critical questions are sufficiently addressed. The evaluation will inform possible mid-pilot modifications and help inform any future PIPP program.

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<sup>86</sup> D.21-10-012, p. 66.

**PROPOSED TARIFF CHANGES**

Pursuant to OP 2 and OP 11 of D.21-10-012, SCE establishes Preliminary Statement Part N.71, the Percentage of Income Payment Plan Pilot Memorandum Account (PIPPMA), to record all incremental administrative costs of the PIPP pilots.

In addition, pursuant to OP 2 and OP 10 of D.21-10-012, SCE establishes Preliminary Statement Part HHHH, a two-way Percentage of Income Payment Plan Pilot Balancing Account (PIPPBA) to record pilot subsidies.

Lastly, SCE modifies Rule 9, Rendering and Payment of Bills, to include the PIPP provision as shown in Attachment A.

No cost information is required for this advice letter.

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

**TIER DESIGNATION**

Pursuant to OPs 2 and 3 of D.21-10-012, SCE submits this advice letter with a Tier 3 designation.

**EFFECTIVE DATE**

This advice letter will become effective upon Commission approval.

**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:

E-mail: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

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

Shinjini C. Menon  
Managing Director, State Regulatory Operations  
Southern California Edison Company  
E-mail: [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com)

Tara S. Kaushik  
Managing Director, Regulatory Relations  
c/o Karyn Gansecki  
Southern California Edison Company  
E-mail: [Karyn.Gansecki@sce.com](mailto:Karyn.Gansecki@sce.com)

Cathy DeFalco  
General Manager  
California Choice Energy Authority (CalChoice)<sup>87</sup>  
E-mail: [cathy@calchoice.org](mailto:cathy@calchoice.org)

Hilary Staver  
Director of Regulatory and Legislative Affairs  
Central Coast Community Energy  
E-mail: [hstaver@3ce.org](mailto:hstaver@3ce.org)

CC Song  
Director of Regulatory Affairs  
Clean Power Alliance of Southern California  
E-mail: [csong@cleanpoweralliance.org](mailto:csong@cleanpoweralliance.org)

There are no restrictions on who may submit a protest, but the protest shall set forth specifically the grounds upon which it is based and must be received by the deadline shown above.

In accordance with General Rule 4 of GO 96-B, SCE is serving copies of this advice letter to the interested parties shown on the attached GO 96-B and R.18-07-005 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com) or at (626) 302-3719. 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](mailto:Process_Office@cpuc.ca.gov).

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by submitting and keeping the advice letter at SCE's corporate headquarters. To view other SCE advice letters submitted with the Commission, log on to SCE's web site at <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

For questions, please contact Diana Valle at (626) 302-5666 or by electronic mail at [Diana.Valle@sce.com](mailto:Diana.Valle@sce.com).

**Southern California Edison Company**

/s/ Shinjini C. Menon  
Shinjini C. Menon

SCM:dv:cm  
Enclosures

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<sup>87</sup> The following CCAs are members of CalChoice: AVCE, LCE, PRIME, POME, RMEA, and SJP. CalChoice is authorized to sign this joint advice letter on behalf of these CCAs.





# ADVICE LETTER SUMMARY

## ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

☐ ELC ☐ GAS ☐ WATER  
☐ PLC ☐ HEAT

Contact Person:

Phone #:

E-mail:

E-mail Disposition Notice to:

### EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas      WATER = Water  
PLC = Pipeline      HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☐ One-Time ☐ Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? ☐ Yes ☐ No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? ☐ Yes ☐ No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets:

<sup>1</sup>Discuss in AL if more space is needed.

**Protests and correspondence regarding this AL are to be sent via email and are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:**

California Public Utilities Commission  
Energy Division Tariff Unit Email:  
[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Contact Name:  
Title:  
Utility/Entity Name:  
  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

Contact Name:  
Title:  
Utility/Entity Name:  
  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

CPUC  
Energy Division Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102

## ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
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PRELIMINARY STATEMENT

Sheet 4

(Continued)

N. MEMORANDUM ACCOUNTS (Continued)

2. Definitions. (Continued)

d. Specified Project (Continued)

<u>Section No.</u>	<u>Interest Bearing Specified Project</u>	<u>Memorandum Account*</u>	
(56)	Customer Service Re-Platform Memorandum Account (CSRPMA)	Yes	
(57)	Energy Matinee Tariff Program Pilot Memorandum Account (EMTPMA)	Yes	
(58)	Green Tariff Shared Renewables Administrative Costs Memorandum Account	Yes	
(59)	Green Tariff Marketing, Education & Outreach Memorandum Account	Yes	
(60)	Enhanced Community Renewables Marketing, Education & Outreach Memorandum Account	Yes	
(61)	Residential Rate Implementation Memorandum Account (RRIMA)	Yes	
(62)	Rule 21 Cost Envelope Option Memorandum Account (CEOMA)	Yes	
(63)	Tax Accounting Memorandum Account 2018 (TAMA 2018)	Yes	
(64)	California Consumer Privacy Act Memorandum Account (CCPAMA)	Yes	
(65)	Distributed Generation Statistics Contractor Memorandum Account (DGSCMA)	Yes	
(66)	COVID-19 Pandemic Protections Memorandum Account (CPPMA)	Yes	
(67)	System Reliability Procurement Memorandum Account (SRPMA)	Yes	
(68)	Medium-Large Commercial and Industrial COVID-19 Disconnection Moratorium Memorandum Account (MLCDMMA)	Yes	
(69)	Voluntary Allocation and Market Offer Memorandum Account (VAMOMA)	Yes	
(70)	Click-Through/Rule 24 Memorandum Account (CTR24MA)	Yes	(P)
(71)	Percentage of Income Payment Plan Memorandum Account (PIPPMA)	Yes	(N)

\* Interest shall accrue monthly to interest-bearing Memorandum Accounts by applying the Interest Rate to the average of the beginning and ending balance.

(Continued)

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PRELIMINARY STATEMENT

Sheet 102

(Continued)

## N. MEMORANDUM ACCOUNTS (Continued)

## 71. Percentage of Income Payment Plan Memorandum Account (PIPPMA)

## a. Purpose

The purpose of the PIPPMA is to track and record all incremental administrative costs incurred as a result of the PIPP pilot pursuant to 21-10-012. Such costs include all incremental administrative costs that are incurred solely for the purpose of implementing the PIPP pilot.

## b. Operations of the PIPPMA

Monthly entries to the PIPPMA shall be determined as follows:

- (1) A debit entry equal to incremental administrative cost expenses that are incurred to implement and administer the PIPP pilot;
- (2) A debit entry equal to the amount to co-fund the administrative costs for the third-party facilitator and evaluation contractor, based on SCE's proportional share of the PIPP pilot participation cap.
- (3) An entry to record the transfer of amounts to and from other accounts if applicable and as approved by the Commission; and
- (4) An entry equal to interest calculated by applying one-twelfth of the Federal Reserve three-month Commercial Paper Rate – Non-Financial, from Federal Reserve Statistical Release H.15 (expressed as an annual rate) to the average monthly balance in the PIPPMA. If in any month a non-financial rate is not published, SCE shall use the Federal Reserve three-month Commercial Paper Rate – Financial.

## c. Review and Disposition

SCE will seek review and recovery of the costs recorded in the PIPPMA in its General Rate Case, Energy Resource Recovery Account Review, or other appropriate proceeding(s).

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PRELIMINARY STATEMENT

Sheet 1

## HHHH. Percentage of Income Payment Plan Balancing Account (PIPPBA)

## 1. Purpose:

The purpose of this two-way balancing account is to record the bill discounts/subsidies related to the Percentage of Income Payment Plan (PIPP) pilot pursuant to D.21-10-012. The PIPP bill discounts/subsidies are either (a) the difference between the PIPP bill cap and the customer's actual bill, or (b) zero, if the customer's actual bill is lower than the PIPP bill cap. The PIPP subsidies include amounts forgiven for charges to bundled service and departing load customers, including participating CCA generation-related charges to participating customers.

## 2. Operation of the PIPPBA:

The following entries will be made as applicable:

- a. A debit entry to record the bill discounts/subsidies related to the PIPP.
- b. An annual debit or credit entry to record a transfer of the December 31 balance in the PIPPBA to the Public Purpose Programs Account Mechanism (PPPAM) to be recovered through the Public Purpose Programs Charge.

Interest shall accrue monthly to the PIPPBA by applying the Interest Rate to the average of the beginning-of-month and end-of-month balance in this account equal to one-twelfth the interest rate on three-month Commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

## 3. Review and Disposition

The PIPPBA will remain open for the duration of the PIPP pilot. Amounts recorded in the PIPPBA and transferred to PPPAM shall be included for recovery in SCE's year-end consolidated revenue requirement and rate change advice letter and will be recovered in the following year's Public Purpose Programs Charge (PPPC) rate levels from all customers. The recorded operation of the PIPPBA and PPPAM (which will include the PIPPBA transfers) are reviewed in SCE's annual ERRA Review proceeding to review the entries for purposes of confirming they are stated correctly and consistent with Commission decisions.

(Continued)

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Rule 9  
RENDERING AND PAYMENT OF BILLS

Sheet 6

(Continued)

- J. Percentage of Income Payment Plan (PIPP): PIPP is a four-year pilot, limited to 4,000 eligible residential Customers, and designed to cap a participating Customer's electric and gas bill at four (4) percent of the participating Customer's monthly household income based on current Federal Poverty Guidelines (FPG) for a three-person household.<sup>1/</sup> 75 percent of the bill cap, rounded to the nearest whole dollar, will apply to the participating Customer's electric bill. The monthly bill cap will be applied to the participating Customer's monthly bill prior to any applicable user fees, taxes, and late payment charges.

An eligible Customer is a residential Customer enrolled in the CARE program, and (1) has experienced two or more disconnections during March 2019 through February 2020 or (2) located in a zip code listed below during this timeframe. A participating Customer must comply with CARE income verification and recertification rules. If the participating Customer is removed from the CARE program, the Customer will also be removed from PIPP. Customers served under Schedules DM, DMS-1, DMS-2 or DEMS-3, along with their submetered tenants are not eligible for PIPP. Residential Customers participating in Direct Access, or who do not have a wireless communicating meter known as an Edison SmartConnect® meter, or are enrolled in another pilot program, or enrolled in net energy metering rates are not eligible for PIPP.

For households with monthly incomes between 0-100 percent of the FPG, the four percent bill cap will be applied using 50 percent of the FPG as the reference income. For households with monthly incomes between 101-200 percent of the FPG, the four percent bill cap will be applied using 150 percent of the FPG as the reference income. Participating Customers who request a bill cap for 0-100 percent of FPG must prove their income within 90 days or they will be moved to the bill cap for participants at 101-200 percent of FPG. Participating Customers who request a bill cap for 101-200 percent of FPG will be subject to the existing CARE post-enrollment verification processes. If a participating Customer has verified income for CARE within the past two years, the Customer will not be required to verify income.

<sup>1/</sup> <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines/prior-hhs-poverty-guidelines-federal-register-references/2020-poverty-guidelines>.

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**Rule 9**  
**RENDERING AND PAYMENT OF BILLS**

Sheet 7

(Continued)

**J. Percentage of Income Payment Plan (PIPP): (Continued)**

<b>ZIP Code</b>	<b>City</b>
90022	Commerce/East Los Angeles
90201	Bell / Bell Gardens / Cudahy
90250	Hawthorne
90660	Pico Rivera
90706	Bellflower
90723	Paramount
90805	North Long Beach
91709	Chino Hills
91730	Rancho Cucamonga
91766 91767 91768	Pomona
92270	Rancho Mirage
92301	Adelanto
92307 92308	Apple Valley
92335	Fontana

<b>ZIP Code</b>	<b>City</b>
92345	Hesperia / Lugo
92376	Rialto
92401 92404 92405 92410	San Bernardino
92551 92553	Moreno Valley
92582 92583	San Jacinto
93033	Oxnard
93111	Santa Barbara
93250	McFarland / Vinland / Calico
93501	Mojave / Fleta / Bissel
93505	California City
93534 93535 93536	Lancaster
93550	Palmdale / Vincent

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