SOUTHERN CALIFORNIA GAS COMPANY

ENERGY SAVINGS ASSISTANCE AND CALIFORNIA ALTERNATE RATES FOR ENERGY PROGRAMS & BUDGETS FOR PROGRAM YEARS 2021-2026

(A.19-11-006)

(CALADVOCATES-ESA-CARE-SK8-SCG11)
RECEIVED: JUNE 30, 2020
SUBMITTED: JULY 15, 2020

QUESTION 1:

Why does SoCalGas have attrition from CARE recertifications, non-responses, and PEVs in the months of April and May despite Resolution M-4842 directing IOUs to suspend those activities?

a. Is it possible to restore the CARE discount for April non-response attrition households?

RESPONSE 1:

SoCalGas CARE customers that were terminated in March due to non-response were reported in April because of different billing cycles. Beginning March 20,2020, SoCalGas did not remove any CARE customers from the program due to non-response The majority of attrition was due to closed accounts (moved or deceased), customer request, or customer transferring the discount to their primary account.

a. Yes. The CARE discount for April can be restored and retroactively reinstated.

QUESTION 2:

What happens to the associated budget that won't be spent on recertifications or PEVs during the COVID-19 protection period?

RESPONSE 2:

Any potential amount of budget that is not spent related to recertifications or PEVs during the COVID-19 period is available to fund-shift to other CARE Program line item categories where potential overspending may transpire. If funds remaining from recertification or PEVs are not required in a fund-shift to balance the CARE Program budget, based on the current year-end spend forecast for the CARE Program, then the estimated remaining funds at year-end are returned to the ratepayers in the following year.

QUESTION 3:

Please explain the factors and reasons for the changes in monthly attrition.

RESPONSE 3:

SoCalGas objects to this Request on the grounds that it is vague and ambiguous by not stating the time period in question. For the purpose of responding to this Request, SoCalGas limits the time period to the Covid-19 period of April and May 2020. Notwithstanding these objections, SoCalGas responds as follows:

During the months of April and May 2020, the majority of attrition was due to closed accounts (moved or deceased), customer request, or customer transferring the discount to their primary account. During these months, no attrition was due to customer non-response.

QUESTION 4:

How have efforts to incorporate your probability model into the CARE recertification and verification process impacted attrition rates.

a. Please include specific numbers of customers exempted from recertification and verification as a result of the use of the probability model.

RESPONSE 4:

SoCalGas objects to this Request on the grounds that it is vague and ambiguous by not stating the time period in question. For the purpose of responding to this Request, SoCalGas limits the time period to the Covid-19 period of April and May 2020. Notwithstanding these objections, SoCalGas responds as follows:

SoCalGas' probability model is used to determine which CARE customers are most likely to be eligible for the program, which should be verified through PEV, and which can be exempt from recertification once. Due to the implementation of COVID-19 customer protections, SoCalGas suspended all recertification and PEV requests, and thus suspended use of the CARE probability model until the COVID-19 customer protections end in April 2021. Attrition rates have decreased because of the suspensions.

a. Due to the reasons stated above, all CARE customers are currently exempted from recertification and PEV; no customers are required to recertify or verify their eligibility at this time.

QUESTION 5:

Were any ESA treatments conducted during January 2020?

RESPONSE 5:

Yes, SoCalGas has conducted ESA treatments in January 2020. SoCalGas notes that its January monthly reports have historically reflected no activity because SoCalGas reports ESA treated units in its monthly reports based on invoices for the corresponding work that are approved by month end. SoCalGas uses the month of January to finish receiving and approving invoices for work completed through December 31 of the prior year. Invoices for work completed beginning January of the new year are not approved until February. Keeping expenditures separate in this way allows SoCalGas to present a clearer picture of what costs are associated with what program year. The reason the units approved on invoices in January are not reported in the January monthly report is because they pertain to the prior program year, and are ultimately included in the annual report published in May, and are not part of the new year's results. Comparing results published in the annual report against the corresponding final monthly report for December of the same program year, provides a good understanding of the volume of ESA treatments invoiced and approved in January.

QUESTION 6:

Has SoCalGas explored opportunities for enrollments via data sharing with programs outside the IOU that serve low-income customers?

A. What are the main barriers to data sharing opportunities with programs outside the IOU that serve low-income customers?

RESPONSE 6:

Yes, SoCalGas has explored opportunities for enrollments via data sharing with programs outside of the IOU that serve low-income customers. SoCalGas has implemented mandated data sharing with California Lifeline and the opted-in water utilities in its service territory. SoCalGas is also in discussions to share data with Los Angeles Department of Water and Power. SoCalGas has explored data sharing opportunities with MetroLink as well.

a. The main barriers to data sharing with non-mandated entities and agents outside the IOUs that serve low-income customers are related to IT system differences and limitations, customer privacy, and the time and resources necessary to provide a customer opt-out functionality that is required in order to share customer information.

QUESTION 7:

When SoCalGas removes a CARE customer for non-response, failed recertification, or failed PEV, is that customer barred from CARE for some period time?

RESPONSE 7:

CARE customers who are removed for non-response or failed recertification are able to re-enroll at any time. CARE customers who failed to respond to a PEV request must show proof of eligibility in order to re-enroll in the program within the first 24 months of being removed. After 24 months, they may re-enroll via self-certification.

QUESTION 8:

How does SoCalGas identify newly eligible CARE customers?

a. Has SoCalGas modified this approach in response to COVID-19?

RESPONSE 8:

SoCalGas identifies newly eligible CARE customers in the following ways:

- Over the phone CSR enrollment during Turn-On service-related calls.
- Over the phone CSR enrollment during Payment Extension-related calls.
- Targeted Direct Mail Campaigns to new SoCalGas customers not on CARE and existing SoCalGas customers not on CARE not previously PEV-terminated in less than 24 months.
- Targeted Email Campaigns to new SoCalGas customers not on CARE and existing SoCalGas customers not on CARE not previously PEV-terminated in less than 24 months.
- Targeted Text Campaigns to new SoCalGas customers not on CARE and existing SoCalGas customers not on CARE not previously PEV-terminated in less than 24 months.
- Partnering with CARE capitation and canvassing agencies, community outreach partners, and other community-based organizations.
- Through advertising campaigns, across various media channels, targeted to areas of under-penetration.

a. SoCalGas has made the following modifications to this approach in response to COVID-19:

    - Updated SoCalGas.com/coronavirus to include COVID-19 customer protection plan messaging.
    - Updated SoCalGas.com/assistance to include language regarding customer eligibility if a customer has recently lost employment due to COVID-19, the household may now qualify for CARE or ESA assistance.
    - Increase frequency and scope of advertising campaigns to promote CARE targeting those who are recently unemployed.
    - Added partnerships with food banks to target highly-impacted customers.

- Targeted, tactical marketing plans incorporating local media and additional CBO partnerships in counties which are below 70% of penetration.