BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

Order Instituting Rulemaking to Consider New
Approaches to Disconnections and Reconnections
to Improve Energy Access and Contain Costs.

SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E) OPENING COMMENTS
TO PROPOSED DECISION ADOPTING INTERIM RULES TO REDUCE
RESIDENTIAL CUSTOMER DISCONNECTIONS FOR CALIFORNIA-
JURISDICTIONAL ENERGY UTILITIES

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SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E) OPENING COMMENTS TO PROPOSED DECISION ADOPTING INTERIM RULES TO REDUCE RESIDENTIAL CUSTOMER DISCONNECTIONS FOR CALIFORNIA-JURISDICTIONAL ENERGY UTILITIES

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I. INTRODUCTION


The Commission issued this Proposed Decision to adopt interim rules applicable to all California investor owned gas and electric utilities designed to immediately reduce the number of residential customer disconnections and to improve the reconnection process for disconnected customers. The Proposed Decision adopts these interim rules to take effect immediately on an emergency basis to provide rapid relief while longer-term solutions are considered during Phase I of the Proceeding. These interim rules: (1) impose an annual cap on residential customer disconnections, based on 2017 recorded levels per utility, (2) modify existing rules prohibiting
disconnections during extreme weather conditions, and (3) limit disconnections of vulnerable customers. The Proposed Decision also addresses issues such as the applicability of the interim rules to smaller utilities, proposes new reporting requirements, and denies the establishment of a memorandum account to track incremental recorded costs associated with the implementation of the interim rules. Finally, the Proposed Decision states that these interim rules shall remain in effect pending a subsequent Phase 1 decision or until the Commission directs otherwise. If the Commission’s final decision requires modifications to SCE’s current tariffs, SCE will promptly file an advice letter within 30 days of the issuance of the decision to make necessary changes in accordance with the decision.

SCE’s comments on the interim rules and other issues discussed in the Proposed Decision are contained herein.

II. DISCUSSION

A. SCE Supports Limiting Disconnection Rates as an Interim Measure, but a Comprehensive Analysis Must be Conducted before Long-Term Policies are Adopted

SCE continues to support the Commission’s goals for Phase 1 of this Proceeding, and recognizes the Commission’s intent to immediately implement a hard cap on disconnections to protect all customers against further increases in the rates of residential disconnections. The Proposed Decision recognizes that a hard cap might have other consequences, but finds that the benefits of the cap outweigh the potential longer-term issues. While SCE agrees that this cap

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1 Proposed Decision (PD) p. 2.
2 Id. p. 9.
3 Id. pp. 10-11.
will provide interim relief to customers, SCE maintains its concerns regarding the potential for unintended consequences resulting from implementation of a hard cap on all disconnections, such as eliminating disconnections to non-vulnerable customers who may not need the relief. Providing relief to customers who do not need it will affect all other customers who will bear the additional cost of the interim relief. SCE also notes a comprehensive root cause analysis must be conducted to understand customer behavior and the record evidence in this proceeding should be developed to fully understand the benefits and challenges associated with any long-term policies adopted in this proceeding. In addition, SCE does not believe that the number of disconnections should be limited by an administratively set count, but rather driven by meaningful criteria derived from the root cause analysis.

SCE will continue to work with Commission staff to implement this hard cap on an interim basis, and looks forward to collaborating in developing long term solution moving forward in this proceeding.6

B. SCE Agrees with Limiting Disconnections to Vulnerable Customers

In its Opening Comments to the OIR, and in Opening and Reply Comments to the September 13, 2018 Ruling, SCE supported expeditious relief for vulnerable customers in alignment with the provisions set forth in SB 598. SCE supports the Commission’s interim rule to limit disconnections of customers if they qualify for medical baseline and/or are above 65 years old (senior citizens), as long as the customer agrees to a payment plan.7 SCE agrees with the Commission’s definition of “vulnerable customers,” limiting the target population of this interim rule to be consistent with the definition detailed in D.16-09-016,8 recognizing that any

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6 SCE will base its hard cap on residential disconnections on 2017 disconnection rates (9.75 percent for SCE as set in Appendix A of the Proposed Decision), and apply the rolling monthly methodology proposed in Appendix B of the Proposed Decision.
7 PD p. 26, Ordering Paragraph (OP) 1.b.
8 D. 16-09-016, Section 2.1.2, Finding of Fact (FOF) 3, and Ordering Paragraph (OP) 1 states that a senior citizen is defined as any permanent member of a household, age 65 or older, in any income
expansion of the definition of vulnerable customers as proposed by other Parties, warrants additional examination regarding the implications and practicalities of implementation.9

C. **Age-Related Inquiries Should be Limited to Live-Agent Calls Following a Final Disconnection Call Notice**

The Proposed Decision would require the utility to “inquire” whether a customer meets the age criteria outlined in the interim rule if the utility has discussions with that customer prior to disconnection.10 The meaning of “discussions prior to disconnection” is vague, and SCE recommends that “discussions prior to disconnection” refer to calls made to customers or received by SCE’s live agents that occur after a customer receives a final call notice prior to a service disconnection.11 Without this clarification, there is potential for cost increases due to the expected impact of engaging in age related inquiries on to average handle time (AHT) for live agent calls made to or made by a customer regardless of whether the customer is at risk of disconnection. In addition, because the permanent members of a household might vary over the course of service, it is reasonable to limit age-related inquiries to live agents calls resulting from final calls issued prior to disconnection.

D. **The Requirement to Begin Age-Related Inquiries Should Begin on January 7, 2019**

The Proposed Decision requires that the interim rules take effect immediately on an emergency basis.12 However, implementation of the age-related inquiry measure will take additional time due to the coordination and training required of agents who make the live calls. New live agent call scripting and training protocols will need to be developed, coordinated and

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9 PD p. 19.
10 Id. p. 26, OP 1.b.
11 SCE typically mails final call (disconnection) notices to customers 41 days after a bill has been presented and not paid. Final call notices notify customers that they are at risk of being disconnected.
12 PD p. 2.
tested before implementation with both internal SCE Call Center staff and with SCE’s outside service providers. Therefore, SCE recommends the Commission allow the requirement to begin on January 7, 2019.

E. **SCE Currently Employs an Extreme Weather Disconnection Limitation Policy, but will Modify its Policy to Align with the Proposed Decision’s Requirements**

SCE supports the Commission’s interim rule to limit residential disconnections during extreme weather events,\(^{13}\) recognizing that disconnections on extremely hot or cold days can impact the safety of our customers. The PD states that “SCE is the only major IOU that has not yet implemented these protections for residential customers.”\(^{14}\) SCE clarifies, however, that it does in fact employ an extreme weather limitation policy on residential disconnections. SCE’s current extreme weather event policy differs from the approach described in the Commission’s September 13, 2018 Ruling, but SCE will align with the extreme weather policy described in the Proposed Decision (above 100 degrees or below 32 degrees).\(^{15}\) SCE looks forward to working with the Commission’s Energy Division and the other IOUs to coordinate on any remaining technical details for the new temperature limitation methodology.

F. **The Commission Should Allow the Utilities to Establish Memorandum Accounts to Track Incremental Costs Associated with Implementing Interim Measures**

The Proposed Decision denies establishment of a memorandum account to record costs associated with the implementation of the interim rules, and states that the Commission “[is] not persuaded that incremental costs associated with implementing these rules are of such significance as to warrant authorization of memorandum account treatment.”\(^{16}\) SCE notes that

\(^{13}\) PD p. 19.

\(^{14}\) Id. pp. 20-21.

\(^{15}\) Id. p. 21.

\(^{16}\) PD p. 9.
the utilities have not been provided the opportunity to estimate the incremental costs associated with the implementation of the interim rules required by the Proposed Decision. In addition, the Commission has previously authorized the establishment of memorandum account treatment to track costs that resulted from implementing new practices and programs in the previous Disconnections OIR (R.10-02-005), including any incremental operations and maintenance costs, as well as any uncollectable expense in excess of what was authorized in SCE’s last General Rate Case.\textsuperscript{17} Between 2010 and 2014, SCE recorded over $17 million in the Disconnections Memorandum Account of which over $16 million was related to uncollectible expense. These costs are not insignificant and the Commission allowed recovery of these incremental costs in SCE’s 2015 General Rate Case final decision. Therefore, SCE recommends that the Commission allow the establishment of a new memorandum account to track operations and maintenance costs and any uncollectable expense associated with the implementation of measures, both interim and long-term, as a result of this Proceeding, and allow SCE to seek recovery of these costs in its General Rate Case or other appropriate proceeding.

III.

CONCLUSION

SCE appreciates the opportunity to provide its comments on the Commission’s Proposed Decision. For the foregoing reasons, SCE respectfully requests that the Proposed Decision be modified to incorporate the changes requested herein.

Respectfully submitted,

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/s/ Jane Lee Cole
By: Jane Lee Cole

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Date: November 19, 2018
Appendix A

SCE’s Proposed Modifications to the Findings of Fact, Conclusions of Law, and Ordering Paragraphs of the Proposed Decision
**Appendix A**

SCE recommends the following changes to Proposed Decision (PD), with deletions shown in strikethroughs and additions in bold underline.

<table>
<thead>
<tr>
<th>Citation</th>
<th>Proposed Change</th>
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<tr>
<td>FOF 8</td>
<td>There shall be <strong>no</strong> memorandum account treatment of costs that may be incurred in connection with complying with this decision.</td>
</tr>
<tr>
<td>COL 1</td>
<td>The parties in this proceeding have had a reasonable opportunity to comment on the Assigned Commissioner’s Scoping Memo, including the interim rules proposed therein, which form the basis for this decision. <strong>The parties have not provided evidence related to incremental costs associated with implementing the interim rules proposed in this decision.</strong></td>
</tr>
<tr>
<td>COL 8</td>
<td>The interim rules set forth below, <strong>other than utility’s duty to inquire if anyone in the household is age 65+ before disconnection</strong>, should be adopted and made effective immediately to provide quick interim relief to residential customers of California jurisdictional electric and gas utilities while the Commission considers longer-term solutions within the scope of the instant rulemaking.</td>
</tr>
<tr>
<td>OP 1(b)</td>
<td>Residential customers shall not be disconnected for nonpayment if they qualify for medical baseline and/or are above 65 years old, as long as the customer agrees to a payment plan. For the purpose this requirement, senior citizens are defined as any permanent member of a household, age 65 or older, in any income bracket, consistent with Decision 16-09-016 criteria for purposes of applying Public Utilities Code Section 745. If anyone in a household meets that definition, the household’s service may not be disconnected. The Respondent Utility is not required to make affirmative inquiry of every residential household as to whether eligible vulnerable customers reside there. If the</td>
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Respondent Utility has discussions with a residential customer **after a final call notice has been issued but** prior to disconnection, however, that Utility shall have a duty to inquire if anyone in that household meets the age 65+ parameters for senior citizens adopted herein.

| OP 3 | The request for a memorandum account to recover the incremental costs associated with complying with these adopted interim rules is **approved denied**. |
BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

Order Instituting Rulemaking to Consider New Approaches to Disconnections and Reconnections to Improve Energy Access and Contain Costs. R.18-07-005

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission’s Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E) OPENING COMMENTS TO PROPOSED DECISION ADOPTING INTERIM RULES TO REDUCE RESIDENTIAL CUSTOMER DISCONNECTIONS FOR CALIFORNIA-JURISDICTIONAL ENERGY UTILITIES on all parties identified on the attached service list for R.18-07-005. Service was effected by one or more means indicated below:

☒ Transmitting the copies via e-mail to all parties who have provided an e-mail address.
☒ Placing the copies in sealed envelopes and causing such envelopes to be delivered via US Mail to the offices of the Assigned ALJ and/or other addressee(s).

ALJ Gerald F. Kelly
California Public Utilities Commission
Division of Administrative Law Judges
505 Van Ness Ave.
San Francisco, CA 94102

Executed November 19, 2018, at Rosemead, California.

/s/ Laura Velarde
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