

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



April 28, 2021

**Advice Letter 4414-G/6142-E & 4414-G-A/6142-E-A**

Erik Jacobson  
Director, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177

**SUBJECT: PG&E's COVID-19 Emergency Customer Protections Transition Plan,  
Pursuant to Resolution M-4849, Ordering Paragraph 5 & Supplemental:  
PG&E's COVID-19 Emergency Customer Protections Transition Plan,  
Pursuant to Resolution M-4849, Ordering Paragraph 5.**

Dear Mr. Jacobson:

Advice letters 4414-G/6142-E & 4414-G-A/6142-E-A are effective as of April 1, 2021.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph  
Deputy Executive Director for Energy and Climate Policy/  
Director, Energy Division

April 1, 2021

**Advice 4414-G/6142-E**

(Pacific Gas and Electric Company U 39 M)

Public Utilities Commission of the State of California

**Subject: PG&E's COVID-19 Emergency Customer Protections Transition Plan,  
Pursuant to Resolution M-4849, Ordering Paragraph 5**

**Purpose**

Pursuant to Ordering Paragraph (OP) 5 of California Public Utilities Commission (Commission or CPUC) Resolution M-4849, Pacific Gas and Electric Company (PG&E) submits this advice letter (AL) to describe its transition plan to effectively ease customers off COVID-19 emergency customer protections for residential and small business customers, which are set to expire on June 30, 2021.

**Background**

On March 4, 2020, Governor Newsom declared a statewide emergency in response to the COVID-19 pandemic. In response, PG&E suspended disconnections and provided for flexible payment plans for all residential and small business customers.

In compliance with D.19-07-015, OP 2, PG&E submitted Advice Letter 4227-G/5784-E on March 19, 2020 to extend the following emergency customer protections to our residential and small business customers within our service territory:

1. Suspending service disconnections for non-payment and waiving security deposits;
2. Implementing flexible payment plan options; and
3. Providing additional support for low-income and medical baseline customers.

PG&E submitted supplemental ALs on April 3, 2020 and May 21, 2020 to allow customers to enroll in the medical baseline program without authorization from a qualified medical practitioner and revise the description of certain protections as recommended by the Energy Division. The Commission approved Advice Letter 4227-G/5784-E and supplements on July 27, 2020.

On April 16, 2020, the Commission issued Resolution M-4842 directing PG&E to offer emergency customer protections to all residential and small business customers through April 16, 2021, with an option to extend that date. The Resolution recognizes that not all provisions adopted in D.19-07-015 may apply during a pandemic and directs PG&E to explain why it believes any provisions do not apply.

On May 1, 2020, in compliance with Resolution M-4842, PG&E submitted Advice Letter 4244-G/5816-E to extend the following emergency customer protections to residential and small business customers:

- Extend flexible payment plan options
- Suspend disconnection for nonpayment and waive deposit requirements
- Support low-income residential customers by:
  - Freezing all standard and high-usage reviews for the California Alternate Rates for Energy (CARE) program
  - Contacting all community outreach contractors to help better inform customers of these eligibility changes
  - Partnering with the program administrator of the customer funded emergency assistance program for low-income customers and increase the assistance limit amount
  - Indicate how the energy savings assistance program can be deployed to assist impacted customers
  - Suspending all CARE and FERA program removals to avoid unintentional loss of the discounted rate during the period for which the customer is protected under these customer protections
  - Discontinuing all recertification and verification requests that require customers to provide their current income information

In Advice Letter 4244-G/5816-E, PG&E explained that the following customer protections are not applicable to the COVID-19 pandemic:

- Waive deposit requirements for residential customers seeking to reestablish service for one year and expedite move in and move out service requests
- Stop estimated usage for billing attributed to the time period when a home/unit was unoccupied as a result of the emergency
- Identify the premises of affected customers whose utility service has been disrupted or degraded, and discontinue billing these premises without assessing a disconnection charge
- Prorate any monthly access charge or minimum charges.

The Commission approved Advice Letter 4244-G/5816-E and supplements<sup>1</sup> on July 27, 2020.

On February 11, 2021, the Commission adopted Resolution M-4849 directing PG&E to extend COVID-19 emergency customer protections for all residential and small business customers from April 16, 2021 through June 30, 2021.<sup>2</sup> Resolution M-4849 also requires PG&E to submit a transition plan on April 1, 2021 that describes its efforts to effectively ease customers off COVID-19 emergency customer protections.<sup>3</sup>

### **Discussion**

PG&E respectfully submits its transition plan as Attachment A to this advice letter. The purpose of PG&E's transition plan is to share how we will effectively assist our customers by:

- Leveraging high touch and culturally focused outreach to inform our customers of any changes to programs that they are currently enrolled in;
- Helping our customers manage unpaid bills that have accumulated over the past year; and
- Driving enrollment in programs that help our customers manage their bills moving forward.

PG&E's transition plan includes a timeline of resumed customer credit, collections, and customer program administration activities, PG&E's marketing, education, and outreach strategy, an explanation of how the plan accounts for compliance and safety, and a progress tracking and reporting plan.

In developing its transition plan, PG&E coordinated with other utilities across California and requested feedback from key stakeholders such as the Low-Income Oversight Board (LIOB), community-based organizations (CBOs), and Community Choice Aggregators (CCAs).

### **Tariff Revisions**

PG&E's customer service offices (CSOs) are currently closed in response to the COVID-19 pandemic. Accordingly, PG&E seeks to make the following modifications to our tariffs to clarify that we may disconnect a customer for non-payment following the expiration of

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<sup>1</sup> On June 2, 2020, PG&E submitted supplemental Advice 4244-G-A/5816-E-A to modify the allocation for partial payments received from residential customers served by Energy Service Providers and Core Transport Agents and to track financing costs associated with COVID-19-related revenue collection delays in the COVID-19 Pandemic Protections Memorandum Account. On July 15, 2020, PG&E submitted second supplemental Advice 4244-G-B/5816-E-B to reflect modifications and clarifications based on Energy Division guidance.

<sup>2</sup> Resolution M-4849, OP 1.

<sup>3</sup> Resolution M-4849, OP 5.

emergency customer protections if its CSOs are closed as long as the customer has access to PG&E in accordance with Public Utilities Code (PUC) 708.3:

- **Electric Rule 11, Discontinuance and Restoration of Service –**
  - Adding new footnote to Section B to clarify that PG&E may disconnect a customer for non-payment if its customer services offices are closed as long as the customer has access to PG&E in accordance with PUC 708.3.
  
- **Gas Rule 11, Discontinuance and Restoration of Service –**
  - Adding new footnote to Section C to clarify that PG&E may disconnect a customer for non-payment if its customer services offices are closed as long as the customer has access to PG&E in accordance with PUC 708.3.

For convenience of the reader, where text has been revised in the tariff sheets, PG&E has included the redline revisions in Attachment 2.

### Protests

**\*\*\*Due to the COVID-19 pandemic and the shelter at home orders, PG&E is currently unable to receive protests or comments to this advice letter via U.S. mail or fax. Please submit protests or comments to this advice letter to EDTariffUnit@cpuc.ca.gov and PGETariffs@pge.com\*\*\***

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than **April 21, 2021**, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, California 94102

Facsimile: (415) 703-2200  
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson  
Director, Regulatory Relations  
c/o Megan Lawson  
Pacific Gas and Electric Company

77 Beale Street, Mail Code B13U  
P.O. Box 770000  
San Francisco, California 94177

Facsimile: (415) 973-3582  
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

### **Effective Date**

Pursuant to General Order (GO) 96-B, Rule 5.1 and OP 5 of Resolution M-4849, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective upon date of submittal, which is **April 1, 2021**.

### **Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.18-03-011. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process\_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

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Erik Jacobson  
Director, Regulatory Relations

### Attachments

cc: Service List R.18-03-011



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (U 39 M)

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Stuart Rubio

Phone #: (415) 973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: SHR8@pge.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4414-G/6142-E

Tier Designation: 2

Subject of AL: PG&E's COVID-19 Emergency Customer Protections Transition Plan, Pursuant to Resolution M-4849, Ordering Paragraph 5

Keywords (choose from CPUC listing): Compliance

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Res. M-4849

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

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: 4/1/21

No. of tariff sheets: 6

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

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: N/A

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

Pending advice letters that revise the same tariff sheets: N/A

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

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

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Name: Erik Jacobson, c/o Megan Lawson  
Title: Director, Regulatory Relations  
Utility Name: Pacific Gas and Electric Company  
Address: 77 Beale Street, Mail Code B13U  
City: San Francisco, CA 94177  
State: California Zip: 94177  
Telephone (xxx) xxx-xxxx: (415)973-2093  
Facsimile (xxx) xxx-xxxx: (415)973-3582  
Email: [PGETariffs@pge.com](mailto:PGETariffs@pge.com)

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: District of Columbia Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

<b>Cal P.U.C. Sheet No.</b>	<b>Title of Sheet</b>	<b>Cancelling Cal P.U.C. Sheet No.</b>
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37072-G	GAS TABLE OF CONTENTS Sheet 1	36999-G
37073-G	GAS TABLE OF CONTENTS Sheet 6	36968-G

<b>Cal P.U.C. Sheet No.</b>	<b>Title of Sheet</b>	<b>Cancelling Cal P.U.C. Sheet No.</b>
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49318-E	ELECTRIC TABLE OF CONTENTS Sheet 1	49300-E
49319-E	ELECTRIC TABLE OF CONTENTS Sheet 19	48875-E



**GAS RULE NO. 11**

Sheet 1

**DISCONTINUANCE AND RESTORATION OF SERVICE**

If PG&E terminates or refuses to restore service to a Customer or any other person for any of the reasons or upon any of the grounds stated herein, PG&E shall incur no liability whatsoever to said Customer or person or to any other Customers or persons.

**A. APPLICABILITY**

This Rule applies to Core/Noncore End-Use Customers.

See Rule 23 for services provided to Core Transport Agents (CTA) and for additional requirements for Core Customers served on Schedule G-CT.

**B. CUSTOMER REQUEST TO TERMINATE LIABILITY FOR PAYMENT FOR SERVICE**

**1. SERVICE TO OTHER THAN MULTIFAMILY ACCOMMODATIONS**

When a Customer wants to terminate liability for payment for service, the Customer shall give PG&E not less than two days notice and state the date on which the termination is to become effective. The Customer may be held responsible for all service furnished at the premises until two days after receipt of such notice by PG&E, or until the date of termination specified in the notice, whichever date is later.

**2. SERVICE TO MULTIFAMILY ACCOMMODATIONS**

When a Customer wants to terminate liability for payment for the service supplied to a multifamily accommodation and the termination may deprive residential tenants of service, the Customer shall give PG&E and the tenants notice at least 10 days prior to the date the Customer desires to terminate liability for payment for the service. The Customer may be held responsible for all service furnished at the premises until ten days after receipt of such notice by PG&E, or until the date of termination specified in the notice, whichever date is later.

**C. TERMINATION OF SERVICE FOR NONPAYMENT—WEEKENDS, HOLIDAYS AND EXTREME WEATHER FORECASTS.**

Service will not be terminated for nonpayment of bills or credit deposit requests on Saturdays, Sundays, legal holidays or when the offices of PG&E are closed to the public.<sup>1</sup>

(T)

Residential service shall not be disconnected when temperatures above 100 degrees or below 32 degrees are forecasted by PG&E based on a 72-hour look-ahead period, or for credit deposit requests.

<sup>1</sup> A customer may still be disconnected for non-payment if PG&E's customer service offices are closed to the public as long as the customer has access to PG&E in accordance with Public Utilities Code 708.3.

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*Advice* 4414-G  
*Decision*

*Issued by*  
**Robert S. Kenney**  
*Vice President, Regulatory Affairs*

*Submitted*  
*Effective*  
*Resolution*

April 1, 2021  
M-4849



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**ELECTRIC RULE NO. 11**  
**DISCONTINUANCE AND RESTORATION OF SERVICE**

Sheet 1

If PG&E terminates or refuses to restore service to a customer or any other person for any of the reasons or upon any of the grounds stated herein, PG&E shall incur no liability whatsoever to said customer or person or to any other customers or persons.

**A. CUSTOMER REQUEST TO TERMINATE LIABILITY FOR PAYMENT FOR SERVICE**

**1. SERVICE TO OTHER THAN MULTIFAMILY ACCOMMODATIONS**

When a customer wants to terminate liability for payment for service, the customer shall give PG&E not less than two days notice and state the date on which the termination is to become effective. The customer may be held responsible for all service furnished at the premises until two days after receipt of such notice by PG&E, or until the date of termination specified in the notice, whichever date is later.

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Service will not be terminated for nonpayment of bills or credit deposit requests on Saturdays, Sundays, legal holidays or when the offices of PG&E are closed to the public.<sup>1</sup>

(T)

Residential service shall not be disconnected when temperatures above 100 degrees or below 32 degrees are forecasted by PG&E based on a 72-hour look-ahead period, or for credit deposit requests.

<sup>1</sup> A customer may still be disconnected for non-payment if PG&E's customer service offices are closed to the public as long as the customer has access to PG&E in accordance with Public Utilities Code 708.3

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Advice 6142-E  
Decision

Issued by  
**Robert S. Kenney**  
Vice President, Regulatory Affairs

Submitted  
Effective  
Resolution

April 1, 2021  
M-4849



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Advice 6142-E  
Decision

Issued by  
**Robert S. Kenney**  
Vice President, Regulatory Affairs

Submitted  
Effective  
Resolution

April 1, 2021  
M-4849

Advice 4414-G/6142-E  
April 1, 2021

# **Attachment A**

## **Transition Plan**



# **Pacific Gas and Electric Company's COVID-19 Emergency Customer Protections Transition Plan**



April 1, 2021



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## Transition Plan Purpose and Summary

Pacific Gas and Electric Company (PG&E) recognizes the hardships that our customers are experiencing due to the COVID-19 pandemic. We know that many of our customers are facing uncertainty and we are committed to helping our customers during the transition from emergency customer protections. The purpose of this plan is to share how we will effectively assist our customers by:

- Leveraging multi-channel, multi-touch, and targeted outreach to inform our customers of any changes to programs that they are currently enrolled in;
- Helping our customers manage unpaid bills that have accumulated over the past year; and
- Driving enrollment in programs that help our customers manage their bills moving forward.

Although the COVID-19 emergency customer protections are set to expire on June 30, 2021, we have *already* launched “pre-transition” marketing, education, and outreach (ME&O) efforts in support of our objectives. These activities focus on creating awareness about the expiration of certain customer protections and proactively informing our customers about the status of their accounts and the financial assistance programs that are available to help them. For example, we have completed over 200,000 live outbound calls to customers to inform them about and help enroll them in eligible financial assistance programs.

Both before and after the protections expire, our ME&O strategy is focused on the customer experience, ease of engagement, and availability of information and access to programs. We believe that to be successful, we must use clear and simple messaging and focus on action, accessibility, and clear direction. This includes bundling messaging and looking for opportunities to introduce complementary programs to our customers. In recognizing the hardships that our customers are experiencing, we also understand that it is important to communicate with empathy, care, and humility. We are here to help and want customers to know that we have real solutions to offer.

In addition, we believe that *how* we deliver information to our customers is key. This includes using high touch campaigns that are culturally-focused and coordinated, including partnering with community-based organizations (CBOs), local media and social media, newsletters, and outbound calls to our customers. In particular, we are leveraging the Access and Functional Needs (AFN) Plan for Public Safety Power Shutoff (PSPS) events as well as best practices from the Community Wildfire Safety Program (CWSP) to ensure that our outreach is accessible to all of our customers. We have also engaged and will continue to engage a broad range of stakeholders to improve the delivery of our assistance during the transition. This includes advocates for low-income customers, communities of color, and AFN customers.

The remainder of our transition plan provides additional detail on our ME&O strategy, the timeline for resuming activities that were suspended during the protection period, alignment with relevant program requirements and state and local health orders, and methods for tracking and reporting our progress.



# 1 Background

In response to Governor Newsom’s declaration of a state of emergency on March 4, 2020, PG&E suspended disconnections, offered our most flexible payment plans to all residential and small business customers<sup>1</sup>, and provided additional assistance through our income-qualified and medical baseline programs.<sup>2</sup> Following the California Public Utilities Commission’s (CPUC or Commission) adoption of Resolution M-4842 on April 16, 2020, PG&E extended emergency customer protections through April 2021.<sup>3</sup> See Table 1 for the protections that PG&E extended in response to the COVID-19 pandemic.

On February 11, 2021, the Commission adopted Resolution M-4849, which extends the emergency customer protections through June 30, 2021.<sup>4</sup> Resolution M-4849 also directs PG&E to submit this transition plan to discuss how it will ease customers through a transition off of the emergency customer protections.<sup>5</sup>

**Table 1. Overview of COVID-19 Emergency Customer Protections**

Customer Protection <sup>6</sup>	PG&E Action
Implement payment plan options for residential and small business customers	Implemented March 2020; In place through June 2021
Suspend disconnection for nonpayment and associated fees; waive deposit and late fee requirements for residential and small business customers	
Support income-qualified residential customers by: <ul style="list-style-type: none"> <li>a) Freezing all standard and high-usage reviews for the California Alternative Rates for Energy (CARE) program</li> <li>b) Contacting community outreach contractors to inform customers of changes</li> <li>c) Partnering with the customer funded emergency assistance program for income-qualified customers and increase the assistance limit amount</li> <li>d) Assisting customers through the Energy Savings Assistance (ESA) program</li> </ul>	
Suspend all CARE and Family Electric Rate for Assistance (FERA) removals	
Discontinue recertification/verification requests that require customers to provide their income information	
Include customer protections in outreach and awareness	
Meet and confer with the Community Choice Aggregators (CCAs) to coordinate	
Support medical baseline customers by: <ul style="list-style-type: none"> <li>a) Suspending removals from the program</li> <li>b) No longer sending forms to customers that require them to re-certify through a qualified medical practitioner</li> <li>c) Allowing enrollment without certification from a qualified medical practitioner</li> </ul>	

<sup>1</sup> Small business electric customers are all non-residential metered service customers whose annual usage is equal to or less than 40,000 kWh or whose demand is equal to or less than 20 kW. Small business gas customers are all non-residential metered customers whose usage does not exceed 10,000 therms annually. Non-residential customers are also identified as small businesses if they meet the definition of a “micro-business” under California Government Code 14837.

<sup>2</sup> See PG&E Advice 4227-G/5784-E and supplements.

<sup>3</sup> See PG&E Advice 4244-G/5816-E and supplements.

<sup>4</sup> Resolution M-4849, Ordering Paragraph (OP) 1

<sup>5</sup> Resolution M-4849, OP 5

<sup>6</sup> The COVID-19 emergency customer protections did not include protections associated with destruction of property or degradation of service (e.g., stopping estimated usage for billing attributed to the time period when a home/unit was unoccupied as a result of the emergency.)



## Transition Plan Guiding Principles and Desired Outcomes

Our transition plan is grounded in the following objectives, guiding principles, and desired outcomes which recognize that the pandemic has significantly impacted many Californians and that supporting a positive customer experience requires thoughtfully and comprehensively analyzing our customers' needs (see Table 2).

**Table 2. PG&E's Objectives, Guiding Principles, and Desired Outcomes**

<b>Objectives</b>	Effectively ease customers through a transition from COVID-19 emergency customer protections: <ul style="list-style-type: none"> <li>• Leveraging multi-channel, multi-touch, and targeted outreach to inform our customers of any changes to programs that they are currently enrolled in;</li> <li>• Helping our customers manage unpaid bills that have accumulated over the past year; and</li> <li>• Driving enrollment in programs to help our customers manage their bills</li> </ul>
<b>Guiding Principle</b>	<b>Desired Outcome</b>
Focus on the customer experience	<ul style="list-style-type: none"> <li>• Incorporate customer feedback as part of continuous improvement</li> <li>• Communicate early and with repetition</li> <li>• Make messages clear, actionable and understandable</li> <li>• Make it easy to pay and/or get assistance through tailored programs and services</li> </ul>
Engage stakeholders	<ul style="list-style-type: none"> <li>• Build community relationships</li> <li>• Consult a broad range of stakeholders and incorporate feedback when feasible</li> <li>• Use multiple channels and coordinate campaign efforts</li> </ul>



## 2 Marketing, Education, and Outreach (ME&O)

PG&E's goal in our COVID-19 emergency protections transition ME&O efforts is to help our customers and ease their transition from COVID-19 emergency customer protections. Our ME&O plans focus on proactive communication of targeted and relevant messaging that informs customers of the expiration of the disconnection moratorium, changes to programs in which they are already enrolled, and the financial assistance programs for which they are eligible to support their short and long-term financial security by helping them manage their utility bills.

### ME&O Objectives

1. Create early awareness around the expiration of COVID-19 emergency customer protections;
2. Educate customers about the status of their account and financial assistance resources;
3. Encourage customers to take steps to reduce past due balances using all available financial assistance programs; and
4. Enable customers to stay current through ongoing support and financial assistance programs.

### Key Tenets of our ME&O Efforts

- **Leverage and coordinate with existing ME&O initiatives:** PG&E's transition plan is built on a foundation of ongoing residential and small business ME&O for income-qualified and other existing programs (e.g., Medical Baseline and Energy Efficiency). We are using a variety of channels (e.g., earned media, targeted email and direct mail, online marketing, social media, phone-based outreach, coordinated outreach with CBOs etc.) to ensure we reach customers, including those that are harder to reach, via the channels they use and those with which they are most comfortable.
- **Deliver clear, action-oriented messaging:** Our goal is to deliver communications that are easy to understand and give clear direction on how to access financial assistance and other programs, services, and tools to help our customers manage their bills. We are sensitive to the fact that many of our customers might find themselves in arrears for the first time, so we want to make sure to communicate early and often about how to find and enroll in payment and financial assistance programs.
- **Pre and Post COVID-19 Transition Customer Communications:** COVID-19 protections transition ME&O focuses on strategies and tactics "pre-transition" (i.e., the time before the COVID-19 emergency customer protections expire) in Q1 and Q2 of 2021, and during/after the protections expire (Q3 and ongoing). Our pre-transition strategies and tactics center on creating awareness around the expiration and proactively informing customers about the status of their accounts and the financial assistance programs that are available to help them. Throughout Q1 and Q2, PG&E plans to continue this work and add incremental efforts focused on supporting customers with past due balances. During Q3 2021 and beyond, we plan to continue ME&O efforts to educate customers about the status of their account, help them get out of arrears, and enable them to stay current on their bills. Our ME&O campaigns will feature a multi-lingual and multi-channel campaign to drive awareness of impending changes and to facilitate access to support programs and resources, including a centralized hub of information and links to programs on our website, making this information easy to access.



- **Build off of best practices and lessons learned:** To inform our ME&O plan, we have incorporated best practices and lessons learned from our CBO focus groups, and PSPS customer and community outreach such as our webinar series, CBO engagement, in-language translations, and media engagement.

## 2.1 Target Audience

PG&E plans to expand upon current efforts to help customers that are past due or struggling to pay bills, as well as customers for whom continuous energy service is essential due to medical or other underlying conditions. PG&E is segmenting this target audience into key audiences using the following criteria:

- **General residential support for customers with past due bills:** As of February 19, 2021, approximately 600,000 residential customers out of a total of 1.1 million past due residential customers fall into this category. This customer population includes many of our residential customers who may find themselves struggling to pay their bills for the first time because of the pandemic.
- **Current participants in our residential income-qualified programs:** As of February 19, 2021, approximately 46% of our residential customers with past due balances are currently enrolled in either CARE or FERA.
- **Customers needing additional financial assistance and program support:** This includes Medical baseline-enrolled or eligible customers and/or customers that appear to be Arrearage Management Plan (AMP)-eligible due to amount and age of past due accounts.
- **Small business customers with past due bills:** As of January 2021, approximately 15% of our small business customers have past due balances.

### Leveraging Our Access and Functional Needs (AFN) Plan for Communications

We are using best practices from our AFN Plan for PSPS and CWSP to inform our outreach to customers, including:

- Website translations in **15 non-English languages**
- **Multi-cultural media** engagement
- **Call center support** for non-English speakers (**250+ languages supported**)
- **CBO partnerships**, including those that support customers in the **agricultural economy and speak indigenous languages**
- Bills, notices, and collateral in **non-standard format** (braille, large print)
- Proactive outbound calls (**with support for non-English speakers**)
- **Bill insert** to inform customers on the end of COVID-19 customer protections and available support in **English and Spanish**

## 2.2 Key Customer Outreach Messages

Since mid-March 2020, PG&E has been sending targeted communications to residential and business customers to drive awareness of available support programs, services, tools, and resources. In January and February 2021, PG&E conducted customer research and message testing among residential and small business customers. In March 2021, PG&E surveyed customers again to hear feedback, “One year later.” The overall objective of the research was to gain further understanding of customer input for messaging and to help PG&E prioritize offerings. Initial findings indicate that customers responded well to messaging that is direct, empathetic, and solution oriented. In response to these findings, our key messages will focus on availability and access to support for customers that are struggling to pay their bills or may be



otherwise impacted by the end of COVID-19 emergency customer protections. Most customers expressed interest in PG&E products or services that could help them reduce home energy use and bill totals, as they are spending more time at home and grappling with higher energy bills. Requested topics include PG&E providing tools to track energy use or perform home energy audits, recommendations or discounts for energy-efficient products and upgrades; and information on reduced rate programs.

For non-residential customers, and small businesses in particular, the impact of the pandemic varies widely. Some are struggling and remain in need of support. Many are focused on resilience and recovery. And others have found ways to thrive in the most unlikely of conditions.

PG&E will tailor messages to target audiences and customer needs, and eligibility requirements for specific programs. Table 3 provides example messages for our targeted audiences and aligned offerings.



**Table 3. Target Audiences Key Messages**

	Residential Customers			Small Business Customers
Target Audience	General Residential	Enrolled in Income-Qualified Programs (IQP)	IQP-enrolled – Past Due and Meet AMP Eligibility Criteria	Past Due and Meet Size of Business Criteria
Key Messages	PG&E is committed to helping customers. We offer bill payment options and programs that can help you pay your bills.	In these difficult times, we are dedicated to serving our customer’s needs. Together we can find solutions that work for you.	If you are struggling to pay your energy bill, we offer special financial relief and bill assistance programs that can work for you.	We understand the increasing challenges businesses are facing, and we remain committed to helping your company find ways to save energy and money.
Example Programs, Services and/or Tools Marketed	<p><b>Convenient Ways to Pay</b></p> <ul style="list-style-type: none"> <li>• Flexible payment options</li> <li>• One-time payments</li> <li>• Recurring payments</li> <li>• Budget Billing</li> </ul> <p><b>Financial Assistance and Customer Support</b></p> <ul style="list-style-type: none"> <li>• Income-Qualified Programs – CARE, FERA, ESA</li> <li>• Medical Baseline</li> </ul> <p><b>Other Financial Tools and Resources</b></p> <ul style="list-style-type: none"> <li>• Find the best rate plan option</li> </ul>	<p><b>Financial Assistance Programs</b></p> <ul style="list-style-type: none"> <li>• LIHEAP</li> <li>• REACH</li> </ul> <p><b>Complementary Customer Support and Programs</b></p> <ul style="list-style-type: none"> <li>• Medical Baseline</li> <li>• ESA</li> <li>• Flexible payment options</li> <li>• Lifeline, Internet for All</li> </ul> <p><b>Other Financial Tools and Resources</b></p> <ul style="list-style-type: none"> <li>• Find the best rate plan option</li> </ul>	<p><b>Financial Assistance and Debt Forgiveness Programs</b></p> <ul style="list-style-type: none"> <li>• AMP</li> <li>• LIHEAP</li> <li>• REACH</li> </ul> <p><b>Complementary Customer Support and Programs</b></p> <ul style="list-style-type: none"> <li>• Medical Baseline</li> <li>• State, Local and Federal programs referrals</li> </ul> <p><b>Other Financial Tools and Resources</b></p> <ul style="list-style-type: none"> <li>• Find the best rate plan option</li> </ul>	<p><b>Discount Programs and Payment Options</b></p> <ul style="list-style-type: none"> <li>• Flexible payment options</li> <li>• Economic Development Rate discount for qualified businesses</li> </ul> <p><b>Other Financial Tools and Resources</b></p> <ul style="list-style-type: none"> <li>• Find the best rate plan option (TOU)</li> <li>• On-Bill Financing (OBF) for energy efficiency projects</li> <li>• Business Energy Savings Tool – Online Energy Audit</li> </ul>
Example ME&O Channels Used	<p><b>Broad Reach and Awareness:</b> pge.com, social media, paid media, earned media and media relations, bill messages, customer newsletters</p> <p><b>Targeted Marketing:</b> Direct-to-customer mail and email</p> <p><b>Community Outreach:</b> Coordinated outreach with Tribal Communities, Local Government, CCAs, and CBOs</p> <p><b>Phone-Based Outreach:</b> Outbound calls from Credit Operations and Small Business Advisors from PG&amp;E</p>			



## 2.3 ME&O Campaigns and Activities

### *Leveraging Our Existing Campaigns and Targeted Outreach*

Existing residential and small business campaigns are the foundation of PG&E’s customer protections transition plan. Customer digital newsletters, direct to customer credit and rate campaigns, and marketing and outreach for income-qualified programs (e.g., CARE and ESA) and Medical Baseline have all maintained a steady stream of messaging related to customer programs and support resources. PG&E will leverage these channels to inform customers about the expiration of COVID-19 emergency customer protections and emphasize financial assistance and energy savings solutions that can help them best manage their bills. We will start communicating timing of the COVID-19 protections expirations as part of our “pre-transition” activities because it is important to provide customers early awareness to minimize surprises. Figure 1 shows an example of one of our pre-transition emails to our small business customers.

PG&E’s goal for customers with past due bills is to get them back on track to making payments. Additional campaign elements and messaging will focus on the programs impacted by the end of emergency customer protections to raise awareness and ensure customers understand their options, ideally before the end of emergency customer protections.

It is important to note that the expiration of emergency customer protections would result in numerous operations resuming that have additional timelines and customer outreach plans. For example, a customer that becomes eligible for CARE recertification after June 30, would receive a series of up to six targeted email and direct mail communications over the course of 90 days. For customers facing potential disconnections, there is a process involving numerous communication attempts over the course of more than 60 days. PG&E will coordinate these communications to the extent possible to minimize customer confusion, as discussed in Section 3.1.

Through coordination of existing campaigns, PG&E plans to communicate our financial assistance programs such as payment plan options for eligible customers, bill discount programs like CARE and FERA, energy savings opportunities like the Home Energy Checkup, and other tools and resources that help our customers manage their bills (e.g. bill alerts). In addition, PG&E plans to incorporate messaging for complementary financial assistance programs such as LIHEAP and REACH that may help our customers reduce overall household expenses. PG&E also plans to work with our network of CBOs and community partners to help keep our customers informed about the transition and program offerings. PG&E describes how we plan to leverage CBOs in Section 3.5.2. In addition, PG&E plans to work with ESA contractors to target low-income households for enrollment in the CARE and ESA programs. PG&E is identifying customers who are most likely to qualify for the

**Figure 1. Early Outreach to our Small Business Customers**





ESA program (i.e., customers in our CARE deciles 1 and 2<sup>7</sup> as well as customers that received LIHEAP pledges) and referring these customers to our ESA contractors for home treatment. PG&E will leverage our full portfolio of programs to support our customers and help get them back on track.

### ***Our Customer Service Representatives Provide Targeted and Proactive Outreach***

In addition to our traditional marketing campaigns, PG&E's team of Customer Service Representatives (CSRs) and Credit Operation leads have been proactively calling customers who are behind on their bills to inform them about ways we can help them manage their bills, including enrolling/referring them to bill assistance programs. PG&E plans to continue to use our customer representatives to make these outbound calls to residential and small business customers.

### ***General Awareness Strategies***

PG&E recognizes the need to offer general awareness about the expiration of COVID-19 emergency customer protections and the array of financial support and other programs we offer to support our customers. To this end, PG&E plans the following activities that we will execute as part of our "pre-transition" activities, as shown in Table 4:

- **Dedicated Webpage:** PG&E plans to create a centralized "hub" of information and links to programs, modeled after our COVID-19 protections webpage<sup>8</sup> to make it easy for customers to access the information that they need on their terms.
- **Webinars:** PG&E plans to host a series of web conferences to educate customers on the expiration of the COVID-19 emergency customer protections and provide information on our financial assistance and other programs. These webinars will be recorded and posted to our website. They will also be translated to help reach some of our harder-to-reach customers.
- **Social Media:** PG&E uses social media, including Facebook,<sup>9</sup> Twitter,<sup>10</sup> Nextdoor<sup>11</sup> and Instagram to share valuable information, such as the timing of COVID-19 protections expiration. We also use these platforms to share program information and post key messages from news releases. PG&E plans to continue to use our social media platforms to reach our customers.
- **Media Engagement:** PG&E plans to work closely with external media outlets, including both paid and earned media, to provide awareness about our financial assistance and energy savings programs. PG&E will also leverage our partnerships with multicultural media organizations to share information about our transition plan activities.
- **Stakeholder Advisory Groups, Local Associations, and Civic Organizations:** We will leverage our network of stakeholder advisory groups as part of our localized approach to outreach. These groups allow us to connect with community leaders, elected officials, and other community stakeholders. In addition, we plan to leverage the network and voices of civic organizations such as Chambers of Commerce, Rotary Clubs et al. throughout our service territory. We will provide them information on the COVID-19 emergency customer protection transition and on our portfolio of programs,

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<sup>7</sup> PG&E's CARE propensity model assigns customers a decile score from 1 to 10, with 1 being the most-likely to be CARE-eligible and 10 being the least likely to be CARE-eligible.

<sup>8</sup> [www.pge.com/covid19](http://www.pge.com/covid19)

<sup>9</sup> [www.facebook.com/pacificgasandelectric](https://www.facebook.com/pacificgasandelectric)

<sup>10</sup> [www.twitter.com/PGE4Me](https://www.twitter.com/PGE4Me)

<sup>11</sup> [www.nextdoor.com/agency-detail/ca/san-francisco/pacific-gas-and-electric-company-13](https://www.nextdoor.com/agency-detail/ca/san-francisco/pacific-gas-and-electric-company-13)



products, and services to support their constituents throughout the transition period and beyond.

### **2.3.1.1 Tactical Plan**

PG&E understands the importance of coordinated customer communications. We recognize that the timing of the expiration of the COVID-19 emergency customer protections coincides with other important communication campaigns such as our residential TOU transition, PSPS, and emergency preparedness campaigns. We want to avoid overwhelming our customers with too many disparate communications at once. To mitigate this risk, we plan to start our pre-transition communications well in advance of the expiration of emergency customer protections and bundle messages via existing campaigns and/or channels as shown in Table 4. In addition, we want to ensure that communications are relevant to the audience that receives them. We will accomplish this through data-driven targeting. For example, we want to market CARE/FERA opportunities to pre-qualified customers who have a high likelihood of eligibility. Table 5 provides an overview of our current calendar for marketing campaigns specific to relevant customer programs, products, and services.



**Table 1. COVID-19 Emergency Customer Protections Communication Channels Campaigns Calendar**

Communication Channels	January	February	March	April	May	June	After COVID-19 Emergency Customer Protections End
Customer Care Operations Outreach	Targeted proactive outbound phone calls focused on pricing plans, and financial assistance; Responsive support for incoming calls						Ongoing support - proactive and reactive
PG&E Residential Newsletter	Online Account	Rate Plan Options	Home Energy Checkup	Transition Plan Update	Customer Resources	Medical Baseline Portal and Protections Update	Safety, Energy Efficiency Program Support, and Financial Assistance
PG&E B2B Digital Newsletter			Business support tools	Transition Plan Update; Launch new small business web page and tools	Customer Resources	Customer Protections Update	Safety, Energy Efficiency Program Support, and Financial Assistance
Digital Media	CARE, FERA, ESA, LIHEAP, B2B			CARE, FERA, ESA, MBL, B2B, TOU, PSPS Awareness	CARE, FERA,ESA, Customer Financial Assistance and Program Support campaign		CARE, FERA,ESA, Customer Financial Assistance and Program Support campaign
Radio	CARE, FERA, ESA	CARE, FERA, ESA, Winter Gas Safety	CARE, FERA, ESA	CARE, FERA, ESA	CARE, FERA, ESA	CARE, FERA, ESA	CARE, FERA, ESA
Social Media	Safety, Seasonal Savings, news and events	Safety, Seasonal Savings, news and events	Safety, Seasonal Savings, news and events	Transition Plan Update	Launch Customer Support	Protections Update	PSPS, MBL renewal, Customer Support, Seasonal TOU Savings
Community Based Organizational Outreach	CARE, FERA, ESA, MBL, PSPS, TOU/Rate Awareness,	CARE, FERA, ESA, MBL, PSPS, TOU/Rate Awareness, Customer Protections Updates	CARE, FERA, ESA, MBL, PSPS, TOU/Rate Awareness, Customer Protections Updates	CARE, FERA, ESA, MBL, PSPS, TOU/Rate Awareness, Customer Protections Updates, AMP	CARE, FERA, ESA, MBL, PSPS; Coordinated LIHEAP campaign with local agencies; Toolkit rollout, TOU/Rate Awareness, Customer Protections Updates, AMP	Income Guidelines Updates, Customer Protections Updates, TOU/Rate Awareness, AMP	PSPS, Income-qualified program recertification and enrollment, LIHEAP, TOU/Rate Awareness, AMP
pge.com		Update COVID-19 Support page	AMP, LIHEAP, REACH page updates	Transition Plan and customer	Launch Financial Assistance and	Homepage promotion	Continued promotion of customer support page, PSPS, TOU resources



		(ADD and Customer Protections)		protections content updates	Customer Support Page		
Earned Media		News Releases: - Customer Protections Extended -Winter Savings and Safety	3/2 News Release - Webpage with Tips for Customers Using More Power at Home; 3/17 TOU Release with CleanPowerSF	(Planned 4/5) Transition Plan; Letter to customers; TOU Release - Reminder in Sonoma and Mendocino	(Planned 5/1) Launch Financial Assistance and Customer Support Page and Resources TOU Release: with Peninsula Clean Energy	Income Guidelines Updates; Medical Baseline provider portal; TOU Releases: Monterey Bay Community Power, King City Community Power	Customer Protections End, Financial assistance and support programs; Central Valley TOU releases
PG&E Bill Packet	Here to Help – Financial Assistance Programs	Rate Plan Comparison; Winter Savings and Safety	LIHEAP/ESA; CARE/FERA; Financial Assistance Programs	LIHEAP	COVID-19 Customer Protections and Support	Customer Protections on Outer Bill Envelope	Bill message and insert
<b>Customer Protections-Related Campaigns - For illustrative purposes.          This is not an exhaustive list of all campaigns or tactics.</b>							



**Table 2. COVID-19 Emergency Customer Protections Program Marketing Campaigns Calendar**

Program Marketing Campaigns	January	February	March	April	May	June	After COVID-19 Emergency Customer Protections End
Credit Policy and Pricing Plans	Phone-based outreach to past due customers	Payment reminder letter to past due customers. Launch AMP.	Targeted outreach for AMP and other payment arrangements, Account status mailing test, phone-based outreach			Customer Protections Notifications	Resume Disconnections and Collections Notifications
Medical Baseline	Contact info update and acquisition			Acquisition marketing, contact update for PSPS	Acquisition marketing, contact update for PSPS	Launch provider certification portal	Promote Physician Portal and Online Application, and recertification
CARE/FERA	Acquisition EM/DM, online advertising and SEM	Online advertising and SEM, bill insert	Acquisition EM/DM, online advertising and SEM, Customer Protections Update Letter	Targeted DM - Recertification Update with AMP, online advertising and SEM	Acquisition EM/DM, online advertising and SEM	Online advertising and SEM, Acquisition EM/DM, launch updated income guidelines	Resume Recertification with 90-60-30 Day email and direct mail communications, PEV email and direct mail
ESA	Acquisition EM/DM, online advertising and SEM	Online advertising and SEM	Acquisition EM/DM, online advertising and SEM, Customer Protections Update Letter	Acquisition EM/DM, online advertising and SEM, bill insert	online advertising and SEM	online advertising and SEM; income guidelines and collateral update	Acquisition EM/DM, online advertising and SEM
LIHEAP / REACH		LIHEAP awareness email, Online Advertising, REACH donation solicitation		LIHEAP/ESA Insert, REACH donation solicitation	Enhanced LIHEAP Agency Coordination and coordinated CBO Outreach; expand REACH enrollment efforts	Continued integration with income-qualified program outreach and Customer Support and Financial Assistance Program outreach	Expand CBO-coordination and continue message integration across channels



Small Business Customer Support	Digital Newsletter - Assistance programs; Resiliency Support Email - Small Business Advisor Outreach	Targeted Payment Support Outreach (Direct Mail and Email); Resiliency Support Email – Economic Development Rate	Digital Newsletter - Assistance programs; Resiliency Support Email – Small Business Advisor Outreach	Digital Newsletter – Protection update and support; Resiliency Support Email – Resources; Payment options call campaign	Agricultural TOU impact campaign; Small Business Advisor Outreach; Payment options call campaign; Resiliency and resources email and digital campaign	Summer Seasonal TOU support; Small Business Advisor Outreach; Payment options call campaign; Resiliency and resources email and digital campaign	Summer Seasonal TOU support; Small Business Advisor optimal rate outreach
Public Safety Power Shutoff (PSPS)						PSPS Webinar and CBO Coordination	PSPS Webinar Coordination; PSPS Campaign implementation
Residential TOU Transition				Transition Begins - Timing varies by County and Territory Schedule			TOU Transition
Customer Care Operations Outreach	Targeted proactive outbound phone calls focused on pricing plans, and financial assistance; Responsive support for incoming calls						
<p><b>This table represents PG&amp;E's <u>summary view</u> of Customer Protections Pre and Post-Transition Plan ME&amp;O and complementary campaigns as of the time of this filing.</b></p> <p><b>Tactics, topics, and timing are subject to change.</b></p>							



## Overview of Tactical Plan

PG&E describes the communication channels in its tactical plan (Table 4) in further detail below. PG&E coordinates these channels across multiple campaigns. In addition, tactics such as newsletters, direct outreach, web content and CBO outreach are integrated, meaning that the mix of messages will vary at any given time and that multiple programs or topics may be covered by a single communication.

- **Radio:** Pre-produced advertising and on-air reading of scripted content. Includes multi-cultural stations. This tactic is helpful in reaching a broad array of our harder-to-reach customers and inform them about helpful financial assistance programs.
- **PG&E Residential Newsletter:** Distributed monthly to more than 3.7 Million customers. We will use this tactic to drive awareness of the COVID-19 emergency customer protections transition and programs we must help them manage their bills.
- **PG&E Business to Business (B2B) Digital Newsletter:** Distributed monthly to more than 100,000 non-residential customers, the vast majority of whom are small businesses. Similar to our Residential Newsletter, this tactic helps us drive awareness of the expiration of the protections, and financial assistance and other programs.
- **Digital Media:** Online advertising campaigns which use a combination of search engine marketing, display advertising, site-specific promotions, sponsored content, etc. We use these tactics to drive awareness on critical issues like PSPS and inform customers about the types as programs and services.
- **Social Media:** PG&E posts content on social channels – Twitter, Facebook, Instagram and Nextdoor and advertises or amplifies certain posts based on timing and message relevance. This is tactic is useful to highlight important dates and events like our transition plan.

### Helping Customers Find the Best Rate Plans – Residential Time-of-Use (TOU) Transition

It is important for our customers to understand their rate options and choose the plan that works best for them, especially since the expiration of emergency customer protections coincides with the transition to a TOU rate plan for approximately 2.5 million eligible residential customers.

PG&E's objective is to transition customers off emergency customer protections while simultaneously executing the separate initiative to transition eligible customers to TOU as smoothly as possible with clear, coordinated communications and targeted customer outreach. In some instances, the TOU communications will overlap with emergency consumer protections ME&O. PG&E will coordinate the messaging in its ME&O for these initiatives to avoid customer confusion and communication fatigue.

Additionally, PG&E has enlisted more than 25 CBOs to help educate vulnerable customers (e.g., low-income, multicultural, disabled, seniors, geographically isolated) on how to manage their bills and understand their rate options. This includes raising awareness that eligible residential electric customers will transition to a TOU rate plan from April 2021 through March 2022 based on geographic location.

A TOU rate plan might not fit the needs of all of customers, so customers may opt-out of the automatic transition to TOU if they choose. Accordingly, the TOU transition provides an opportunity to highlight that customers have rate options and should choose the rate plan that works best for their household.



- **CBO Outreach:** Campaign support for community partners ranges from sharing of social content mentioned above, to print and online collateral, to event support and local community engagement. CBOs are key to our strategy to ensure our customers and communities understand the timing for the expiration of the COVID-19 protections and driving awareness about the financial assistance programs available to our customers and their constituents.
- **Website:** [www.pge.com](http://www.pge.com) – PG&E currently has pages dedicated to COVID-19 Support and over time, plans to shift messaging to more directly focus on emergency customer protections and closely related financial assistance and support programs. We plan to use our website as the centralized “hub” of information on the COVID-19 protections transition.
- **Earned Media:** PG&E’s Media representatives and Communications team work with media outlets and multi-cultural media to secure placement of stories. This tactic is helpful to drive broad awareness across customers, communities, and interested stakeholders.
- **PG&E Bill Packet:** PG&E communicates key information on the exterior envelope (not seen by a customer that receives their bill electronically), bill messages on the bill itself, and through inserts packaged with customers’ monthly billing statement. We will use this tactic to update our customers on the expiration of the COVID-19 protections.

## 2.4 Accessible and Translated Outreach Materials

PG&E plans to use our AFN Plan for PSPS<sup>12</sup> as a model for emergency customer protections transition communications.

<sup>12</sup> Phase 2 De-Energization Decision (D.) 20-05-051, Pacific Gas and Electric Company Access and Functional Needs (AFN Plan).



## Apoyando a nuestros clientes durante COVID-19

Como parte de nuestro compromiso con los clientes afectados por la pandemia mundial de coronavirus (COVID-19), queremos compartir los siguientes recursos.

### Programa Energy Savings Assistance

Obtenga mejoras para ayudar a mantener su hogar más eficiente (podría significar facturas de energía más bajas), seguro y cómodo **sin ningún costo** para usted. Disponible para hogares con ingresos calificados.

#### Las mejoras en el hogar pueden incluir:

- Aparatos de gas y electrodomésticos nuevos que reemplacen su viejo refrigerador, calefactor o calentador de agua\*
- Servicios de impermeabilización del ático y protección contra la intemperie para mantener su hogar más fresco en verano y más cálido en invierno.

Para obtener más información y presentar una solicitud, visite [pge.com/ahorreenergia](http://pge.com/ahorreenergia).

### Low-Income Home Energy Assistance Program (Asistencia Energética para Hogares de Bajos Recursos, LIHEAP)

Si tiene dificultades financieras y necesita ayuda para pagar su factura de gas o electricidad, LIHEAP podría ayudarlo con **un pago único** de hasta \$ 1,000.

Encuentre un proveedor de servicio LIHEAP en su área en [pge.com/liheap](http://pge.com/liheap).

\*La reparación o el reemplazo del calefactor y el calentador de agua podría ofrecerse solo a propietarios de viviendas elegibles sólo cuando PG&E determine que las unidades de gas natural existentes no funcionan o no son seguras.

\*PG&E refers to Pacific Gas and Electric Company, a subsidiary of PG&E Corporation. ©2020 Pacific Gas and Electric Company. All rights reserved. ♻️ Printed on recycled paper. ♻️ Printed with soy ink. 920\_CSP-0920-2690

**Figure 2. Spanish Bill Insert supporting our customers during COVID-19**



We plan to adopt a similar tiered structure to what we use for the PSPS and CWSP outreach for prioritizing and streamlining criteria for translation of emergency customer protections transition communications.<sup>13</sup>

- Tier 1: Fully Translated Critical Collateral and Reference Information
- Tier 2: Language Support Module
- Tier 3: Small-Space Language Support Module

PG&E also offers customers materials in alternative formats such as braille, large print, and audio. PG&E remains committed to the continuous improvement of our websites to better meet the diverse needs of our customers. For example, we will ensure compliance with WCAG 2.0 standards as we launch new features and functionality to [pge.com/covid19](http://pge.com/covid19), and eventually pivot the messaging on the page to transition and post-transition messaging. We also seek to improve the customer experience with user testing for key components.

In addition, PG&E plans to engage with the media, including multi-cultural news organizations and press releases, issuing radio spot advertisements, and participating in media interviews. In turn, these media organizations may provide communications on the radio, broadcast, tv, and online.

Our CBO partnerships are critical when it comes to reaching our diverse, harder-to-reach customer population. We provide more detail in Section 2.5.2 below on how we will engage and partner with CBOs to share information with their customers. As it becomes safe for CBOs, PG&E employees, and customers to gather in-person, PG&E intends to reach out to organizers and consider hosted events. Virtual events and social media collaboration will be explored as alternative channels.

## 2.5 Coordination with External Partners

PG&E believes that effective collaboration and coordination with external partners is critical to effectively supporting our customers. This includes consulting a diverse range of stakeholders, listening to constructive feedback, and leveraging resources for maximum impact. PG&E describes its efforts to coordinate with external partners in further detail below.

### 2.5.1 Local, State, Federal and Tribal Government Engagement

PG&E understands that the pandemic has placed a strain on governmental agencies to meet the needs of their constituents. To this end, PG&E will continue to share information on available assistance programs with local governments as well as local service providers (LSPs) that support LIHEAP.

For example, PG&E developed a LIHEAP portal that streamlines enrollment into the program by enabling LSPs to process pledges faster and more efficiently. LSPs can use the portal to access

### Partnerships: LIHEAP Awareness Campaign

After soliciting input on messaging from Department of Community Services & Development (CSD), PG&E launched a LIHEAP awareness campaign using online advertising and direct marketing in Q4 2020. As part of this campaign, PG&E sent zip-code targeted direct mail postcards to customers in San Joaquin County.

Based on positive response by the agency and increased application volume after deployment, PG&E is expanding this effort across our service area, as part of a **co-marketing campaign** which will target potentially eligible income-qualified customers and refer interested customers directly to participating agencies.

<sup>13</sup> See PG&E's 2021 Wildfire Mitigation Plan, Section 8.4.3, pp.923-927



current balance and other account information to assist in enrollment and eligibility verification of income-qualified customers.

PG&E is also continuing to explore opportunities to partner with CBOs and government agencies that are looking for ways to distribute funding (federal/state, charitable, etc.) to support customers impacted by the pandemic. For example, on January 28, 2021, the California State Senate and State Assembly passed the COVID-19 Tenant Relief Act (SB 91), extending eviction protections through June 30, 2021, and creating a mechanism to deploy \$2.6B in Emergency Rental Assistance Program resources to assist struggling tenants and landlords impacted by COVID-19. PG&E is coordinating with CSD<sup>14</sup> and multiple cities/counties<sup>15</sup> to determine how to simultaneously protect customer accounts and develop a pathway to authenticate the arrears to help customers pay off past due amounts.

In addition, PG&E is aware of approximately 22 counties and 8 cities eligible for CARES Act funding that can be used to pay off past due arrearages.<sup>16</sup> Additional funding may also be available through the American Rescue Plan Act. PG&E has initially been contacted by Placer County and the cities of Sacramento and Fresno to identify qualifying customers and determine opportunities to apply funding to these customers that have outstanding balances owed to PG&E. PG&E has contacted the remaining local governments to share the process we established to allocate CARES Act funding to qualifying customers.

PG&E plans to provide customers information about external emergency assistance funding sources such as the COVID-19 Tenant Relief Act (SB 91) and the American Rescue Plan Act through various channels (e.g. website, CBOs), as applicable to help raise customer awareness.

In addition, PG&E is working with tribal governments and community leaders to prepare their communities for the expiration of COVID-19 emergency customer protections and is seeking feedback and input on opportunities to best support these communities. For example, PG&E has been hosting webinars with individual tribal government representatives and community leaders to share information about assistance programs and emergency protections since the protections were first put into place. In addition, PG&E is sending quarterly emails to all federally recognized tribes in its service territory to reinforce messaging about protections and available assistance programs. PG&E also plans to explore opportunities with tribal governments to use American Rescue Plan Act funds to help customers pay off past due arrearages.

## **2.5.2 Community-Based Organizations**

PG&E recognizes the important roles that CBOs play in the community because of their established relationships and ability to serve as trusted communication channels to customers.

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<sup>14</sup> The California Department of Housing and Community Development will administer funds throughout the state for jurisdictions that did not receive a federal application will have their funds administered by the state program and jurisdictions that opt into the state-run program.

<sup>15</sup> Counties that will administer a local program with funding from SB 91 include: Alameda, Fresno, Kern, Marin, Monterey, Sacramento, San Diego, San Joaquin, Sonoma, and Stanislaus. Cities that will administer a local program with funding from SB 91 include: Anaheim, Bakersfield, Chula Vista, Fremont, Fresno, Irvine, Long Beach, Los Angeles, Modesto, Sacramento, San Diego and Stockton.

<sup>16</sup> Counties with CARES Act funding include: Alameda, Butte, Contra Costa, Fresno, Kern, Marin, Merced, Monterey, Placer, Sacramento, San Francisco, San Joaquin, San Luis Obispo, San Mateo, Santa Barbara, Santa Clara, Santa Cruz, Solano, Sonoma, Stanislaus, Tulare, Yolo. Cities with CARES Act funding include: Oakland, Fremont, Fresno, Bakersfield, Sacramento, Stockton, San Jose, Modesto.



We know talking about financial hardships can be difficult for many customers, and many do not want to share their challenges with people outside of their community. That is why CBOs will play a critical role in ensuring customers understand the timing of the COVID-19 protections transition, the various assistance programs and/or services we offer, and which programs and/or services would work best for them.

PG&E is also developing additional tools and campaign resources to drive engagement with CBOs. We understand that CBOs are undertaking resource-intensive work to partner with us on information distribution in hard-to-reach communities, and we would like to ensure that our community partners are fairly compensated for their critical services. PG&E is actively exploring various CBO partnership structures for this work. One structure that we are exploring would model the sponsored campaigns we are using for rate awareness and the residential TOU transition. This is a “pay-for-activity” model in which CBOs are compensated per activity, such as per social media post. We would pursue similar sponsored campaigns with CBOs for the COVID-19 emergency customer protections transition, that may include activities such as CBO newsletter blurbs, CBO social media posts, or CBO-hosted webinars or online events. For these activities, PG&E would provide content, support, scripts, and presentation materials. PG&E may also develop outreach grants for CBOs, or expand current CBO agreements for services, such as PSPS awareness, or CARE program promotion, to also include COVID protections information dissemination.

In addition, PG&E is implementing a new database and tracking tool to manage CBO communications. PG&E anticipates implementing the bulk of its CBO engagement strategy and CBO database in the first half of 2021, improving coordination and outcomes with our growing CBO network.

Through existing partnerships, CBOs will help amplify our COVID-19 emergency customer protections transition messaging and share relevant updates with their constituents. PG&E plans to work with our CBO and agency network to help engage our customers by:

- **Conducting bi-annual trainings** with contractors that serve PG&E’s customers in the CARE program, which include information on relevant PG&E programs, including our financial assistance programs, so the contractors can assist with educating their clientele throughout the year;
  - Specifically, PG&E hosted a training session in January 2021 to prepare CBOs for the AMP launch; and
  - PG&E will incorporate comprehensive information about AMP and the COVID-19 emergency customer protections transition into its first 2021 CBO training.<sup>17</sup>
- **Providing a communication “toolkit,”** in multiple languages and accessible formats, to help facilitate consistent messaging for financial assistance programs and services. These tools will be intended for customer-facing use through CBO communication channels and ESA contractor networks. The toolkit is similar to the one we developed for our wildfire safety initiatives;<sup>18</sup>
- **Working closely with CSD** to update a “fact sheet” on LIHEAP, and provide training to CSD’s call center representatives on the AMP program along with continued information sharing about the expiration of COVID-19 emergency customer protections; and
- **Collaborating with LIHEAP agencies** to conduct targeted marketing of customers with

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<sup>17</sup> Hosted on March 31, 2021

<sup>18</sup> [www.pge.com/disabilityandaging](http://www.pge.com/disabilityandaging)



information about LIHEAP, AMP, the expiration of COVID-19 emergency customer protections, and additional resources available.

PG&E will continue to collaborate with our CBO network before, during, and after the transition period to ensure they have the resources they need to best support our customers.

### **2.5.3 Community Choice Aggregators**

PG&E met with the CCAs on February 19, 2021 to discuss PG&E’s preliminary plans to support residential and small business customers in light of the expiration of emergency customer protections on June 30, 2021, and how CCAs could support the transition.<sup>19</sup> The purpose of the meeting was to provide an update on our plans to support customers during the transition from emergency customer protections, seek feedback on additional opportunities to support customers based on what CCAs are hearing and seeing, and discuss opportunities to align on customer engagement during the transition. During the meeting, PG&E received feedback from the CCAs on opportunities to partner with CBOs (e.g. food banks) and local government agencies, such as social service agencies. We will continue to coordinate with our CCA partners throughout the transition.

### **2.5.4 Water Agencies<sup>20</sup>**

PG&E understands that increasing the frequency of data exchanges with the water utilities can improve the reach and effectiveness of their customer assistance efforts. PG&E supports increasing the frequency of these exchanges to occur on a quarterly basis and will continue to coordinate with water agencies throughout the transition to support a smooth transition for our customers. We are also open to making this permanent as the Low-Income Oversight Board (LIOB) recommendations suggest.

## **3 Tactical Plan for Resumed and New Activities**

In this section, we describe the timeline of events for resuming our business-as-usual programs and services.<sup>21</sup> These timelines illustrate the steps we are putting in place to help customers before and after the expiration of emergency customer protections. PG&E recognizes the importance of providing customers early insight into the expiration of the COVID-19 protections. As such, we are implementing a two-pronged approach to our customer communication strategy – “pre-transition” communications and “post-transition (during and after the transition). We believe this early communication strategy will help customers have the information they need to prepare for the transition. Details on our approach to proactively communicate with customers to inform them of the changes to programs and services are included in Section 3.

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<sup>19</sup> Resolution M-4842, p. 5.

<sup>20</sup> Resolution M-4849 encourages PG&E to consider increasing the frequency with which we exchange data on accounts enrolled in income-eligible programs so that eligible customers can be targeted for enrollment. Resolution M-4849, p. 13.

<sup>21</sup> Certain customers impacted by wildfires and other disasters pursuant to D.19-07-015 will continue to receive emergency customer protections. For more information, see PG&E Advice 4305-G/5939-E (2020 August Fires), 4311-G/5957-E (Creek Fire), 4322-G/5973-E (Oak, Glass, Zogg Fires), and 4383-G/6087 (January 2021 Winter Storms).





### 3.1 Credit Protections

Following Governor Newsom’s emergency declaration on March 4, 2020, PG&E suspended disconnections, extended its most flexible payment plans, and waived deposits for residential and small business customers. While Resolution M-4849 extends these protections through June 30, 2021, D.20-06-003 requires PG&E to implement permanent measures to support residential customers, including offering a 12-month payment plan and eliminating deposits to establish or re-establish service.<sup>22</sup> PG&E also offers programs and services to support small business customers, including offering a 12-month payment plan and programs to increase energy savings to lower costs. PG&E describes its transition plan for each of the applicable protections in further detail below.

#### 3.1.1 Disconnections

In March 2020, PG&E suspended disconnections to ensure Californians could continue to access essential utility service during the pandemic. Since pausing disconnections, many of our customers have fallen behind on their bills and accumulated past due balances (arrears). As of January 2021, approximately 21 percent<sup>23</sup> of our residential customers are in arrears, compared to approximately 16 percent in January 2020.<sup>24</sup> We know that a thoughtful transition timeline is critical to ensuring customers are aware of the programs and services we have in place to help them get back on track. PG&E views disconnection due to non-payment **as a last resort** and will work with customers that have arrears to increase awareness of available assistance programs, such as the AMP and emerging local city and county programs.

<b>Arrearage Management Plan</b>
In February 2021, PG&E launched the Arrearage Management Plan (AMP), a new payment plan option to help qualifying residential customers reduce unpaid balances on their bills.
With each on-time payment, AMP will forgive 1/12 of the eligible debt a customer owes at the time of enrollment. After twelve on-time payments of the monthly current charges, the customer’s eligible debt will be forgiven up to \$8,000.

In addition, several existing policies, including annual<sup>25</sup> and zip code level<sup>26</sup> disconnection caps, help mitigate the risk of disconnection for residential customers. For example, PG&E does not disconnect residential customers if:<sup>27</sup>

- The customer qualifies for medical baseline and agrees to a 12-month payment plan;
- The customer has not been offered the opportunity to enroll in all applicable benefit programs administered by PG&E;
- The customer is on a 12-month payment plan and is current on both monthly bills and the 12-month payment plan;
- The customer has a Low-Income Home Energy Assistance Program (LIHEAP) pledge pending;

<sup>22</sup> D.20-06-003, OPs 1d, 8-9.

<sup>23</sup> “Pacific Gas and Electric Company’s Monthly Disconnect Data Report,” February 22, 2021. Calculated as 1,139,330 residential customers in arrears (Section 3) divided by 5,507,488 active residential customer accounts (Section 7).

<sup>24</sup> “Pacific Gas and Electric Company’s Monthly Disconnect Data Report,” February 20, 2020. Calculated as 871,883 residential customers in arrears (Section 3) divided by 5,486,580 active residential customer accounts (Section 7).

<sup>25</sup> 4% in 2021 & 2022 and 3.5% in 2023 & 2024.

<sup>26</sup> Not to exceed 30%.

<sup>27</sup> D.20-06-003, OPs 1b-f.



- Temperatures are forecasted to be above 100 degrees or below 32 degrees on a rolling 72-hour-look-ahead period.

In addition, PG&E will not terminate service for nonpayment of bills or credit deposit requests on Saturdays, Sundays, legal holidays, or when the offices of PG&E are closed to the public.<sup>28</sup>

### ***Residential Customer Timeline***

Once the moratorium expires, PG&E will begin segmenting customers for the first phase of disconnection notices. Customer segmentation will be based on the customer's risk level using the following characteristics (in no particular order):

- Number of cycles past due in the past 6, 12, and 14 months;
- Number of payment plans granted in past 12 months;
- Life of account;
- Number of returned payments in the life of the account;
- Number of times shut off for non-payment;
- Current balance;
- Amount past due; and
- Months of service.

#### **Proactive Outbound Call Campaigns**

In addition to our traditional marketing channels such as email and direct, mail, we have leveraged our customer service representatives (CSRs) to perform proactive outbound calls to customers. As of February 2021, our CSRs connected with more than 42,000 customers, enrolling 51% of them in financial assistance programs and identifying more than \$5 million in savings for these customers by changing their rate. In addition, our Credit Operations team has also supported proactive outbound calls to our customers. **In total, PG&E has proactively reached out to more than 200,000 customers as of February 2021 to help them manage their bills.**

As shown in Figure 4, PG&E will provide a full billing cycle (typically 27-33 days) once the moratorium expires for customers to make payments and enroll in payment plans and other assistance programs before any unpaid balance is considered past due.

In this way, PG&E will stagger the restart of its collections process based on a customer's particular billing cycle to provide a consistent period of time to make payments and avoid sending notices to all customers at once. For example, for a customer whose billing cycle runs from the first day of each month, August 2, 2021 would be the earliest possible date that they could receive a notice to pay their past due balance (15-day notice). After sending a 15-day notice to customers, PG&E will make several additional attempts to contact customers to help them obtain the assistance they need to avoid disconnection. In a last resort scenario, the earliest that a residential customer could be disconnected for non-payment is August 25, 2021.

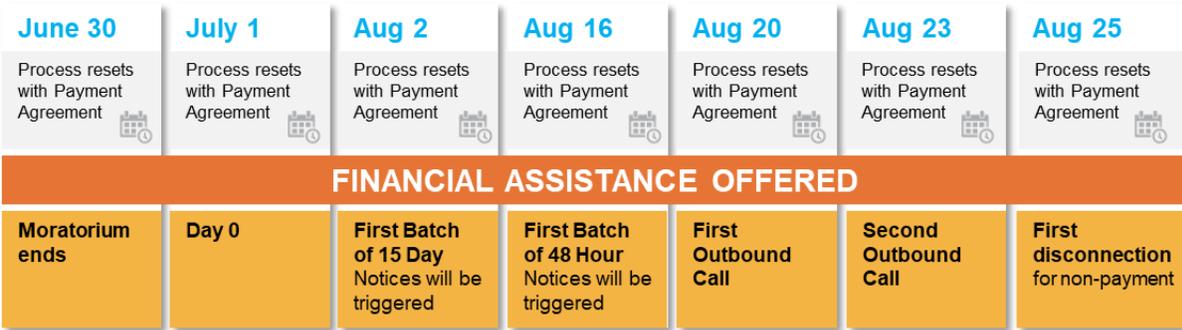
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<sup>28</sup> PG&E is updating its Electric and Gas Rule 11 in this advice letter to clarify that a customer's service may still be discontinued for nonpayment as long as the customer has access to PG&E in accordance with Public Utilities Code 708.3.



**Figure 4. Timeline for Earliest Possible Date for Residential Collection Activities**

**Residential**



Customers are encouraged to enroll in assistance programs at any point in the process

***Small Business Customer Timeline***

In addition to general ongoing outreach to small business customers, our Credit Operations team will be proactively calling our approximately 56,000 small business customers over the next months before the disconnection moratorium ends to share how they can take advantage of offerings (e.g., payment plans, economic development rate, Business Energy Savings Tool etc.) designed to ease financial challenges and offer convenient ways to manage and pay their bill.

Consistent with its approach for residential customers, PG&E will provide a full billing cycle (typically 27-33 days) once the moratorium expires for small business customers to make payments and enroll in payment plans and other assistance programs before any unpaid balance is considered past due. For a small business customer whose billing cycle runs from the first day of each month, August 2, 2021 would be the earliest possible date that they could receive a seven-day notice to pay their past due balance to avoid disconnection.<sup>29</sup> These customers would also be informed of other options to enroll in if they are unable to pay the balance. The earliest a customer could be disconnected for non-payment is August 16, 2021. Figure 5 outlines the earliest date for each notification activity.

We understand these are difficult financial times, and we urge our customers to call us as soon as they know they will have trouble paying their bill. Disconnection of service is a last resort taken only after several attempts to work with customers to resolve their bills.

<sup>29</sup> PG&E Rule 8, Section B; Rule 11, Section D.



Figure 5. Estimated Earliest Possible Date for Small Business Collection Activities

**Small Business (Non-residential process)**



Customers are encouraged to enroll in assistance programs at any point in the process

**3.1.2 Deposits**

PG&E does not require any residential customer to pay a deposit to establish or re-establish service.<sup>30</sup> Beginning July 1, 2021, PG&E intends to re-instate deposits to establish or re-establish service for small business customers. This requirement will be in place on a “going forward” basis for customers that establish or re-establish service. Small business customers can establish credit by:

- Making a credit deposit to secure payment of bills; or
- Furnishing a qualified guarantor to secure payment of applicant’s PG&E bills;

Beginning July 1, 2021, PG&E will provide the following options to assist small business customers who are having difficulty paying the credit deposit to establish or re-establish service in lieu of full payment:

- A flexible payment arrangement;
- Provide an irrevocable letter of credit; or
- Provide a surety bond

PG&E will refund the customer’s deposit as soon as practicable following any review made in accordance with paragraph B.4 of Rule 7, which shows that the customer has paid bills for service for the twelve consecutive months immediately preceding such review without having had more than two past due bills. PG&E will pay interest on deposits.<sup>31</sup> No interest will be paid if service is temporarily or permanently discontinued for nonpayment of bills.

<sup>30</sup> D.20-06-003, OPs 8-9.

<sup>31</sup> Interest on deposits will be calculated on a daily basis, and compounded at the end of each calendar month, from the date fully paid to the date of refund by check or application to a bill. The interest rate applicable in each calendar month may vary and shall be equal to the interest rate on commercial paper (prime, three months) for the previous month as reported in the Federal Reserve Statistical Release, G.13, or its successor publication except that when a refund is made within the first fifteen days of a calendar month the interest rate applicable in the previous month shall be applied for the elapsed portion of the month in which the refund is made.



### **3.1.3 Late Fees**

PG&E clarifies that we do not charge fees for late payments as a standard practice and that we will continue to not charge fees once the emergency customer protections expire.

### **3.1.4 Reconnection Fees**

PG&E does not charge reconnection fees for residential customers<sup>32</sup> and intends to re-instate its \$17.50 reconnection fee for small business customers that are disconnected after the protections expire.

### **3.1.5 Flexible Payment Plans**

Since March 2020, 1.61 million payment plans have been created on residential and non-residential customer accounts. The collection rate for these customers has been 52% on average.

PG&E continues to offer all residential customers a 12-month payment plan.<sup>33</sup> We intend to offer a payment plan for a period of up to 12 months to small business customers that have been impacted by the pandemic and establish their payment plan in 2021.

## **3.2 Income-Qualified Emergency Customer Protections**

Following Governor Newsom's emergency declaration on March 4, 2020, PG&E implemented the following protections to support low-income customers:

- Suspended post-enrollment verification for the CARE program;
- Suspended all CARE and FERA program removals and re-certifications;
- Partnered with our REACH administrator to provide up to \$400 in bill assistance to all self-identifying impacted income-eligible customers (a \$100 increase from standard practice);
- Contacted our community outreach contractors to help better inform customers of income-qualified program changes; and
- Supported our ESA customers while certain in-person activities were suspended.<sup>34</sup>

PG&E describes its plans to transition customers off these protections in further detail below.

### **3.2.1 California Alternate Rates for Energy Program (CARE) / Family Electric Rate Assistance Program (FERA)**

PG&E has observed an increase in CARE/FERA enrollments since pausing re-certifications, program removals, and post-enrollment verification. Specifically, CARE penetration has increased by 13.9% and FERA penetration has increased by 9% since February 2020. In light of the increase in CARE/FERA enrollments, PG&E is committed to ensuring that impacted customers are aware of any actions they might be required to take to remain enrolled in the

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<sup>32</sup> D.20-06-003, OP 16.

<sup>33</sup> D.20-06-003, OP 1d.

<sup>34</sup> In response to local, state, and federal governmental guidance and health directives related to COVID-19, PG&E notified impacted ESA vendors on March 18, 2020 that it would suspend all customer outreach, enrollment, and installation activities in the ESA program that require face-to-face interactions, with the exception of critical activities to ensure the health and safety of our customers. PG&E discontinued the suspension on customer outreach, enrollment, and installation activities in the ESA program on May 31, 2020, and will continue to implement the ESA program in full force, unless directed otherwise based on local, state, and federal governmental guidance and health directives.



programs. PG&E describes its plans to increase customer awareness and support for re-instating the recertification and post-enrollment verification processes in further detail below.

### 3.2.1.1 Recertification

PG&E requires CARE and FERA participants to recertify their eligibility to remain enrolled in the programs either:

- Every two years for individually metered customers and sub-metered tenants of master-metered customers; or
- Every four years for customers that have a fixed income.

Customers do not need to provide proof of income during recertification and are only required to attest that they still meet the program’s eligibility requirements. Customers can recertify by:

- Completing an automated CARE/FERA application at [www.pge.com/carefera](http://www.pge.com/carefera)
- Renewing through mail, email, fax, or a CARE Community Outreach Contractor<sup>35</sup>
- Calling 1-866-743-2273 and completing a few simple phone prompts or receiving direct support from a Customer Service Representative that will guide the customer through the online CARE/FERA application process step-by-step

PG&E provides five notifications to customers that inform them of the need to recertify their eligibility to remain in the program. Figure 6 describes this notification process which begins 90 days prior to the date that their recertification is due.

**Figure 6. Timeline for Earliest Possible Date for CARE/FERA Re-Certification Process and Program Removal**



Customers are encouraged to enroll in other assistance programs throughout the process

#### 3.2.1.1.1 Customers Who Would Have Received a Recertification Notice Within the Protection Period

In support of our objective of effectively easing customers through this transition, PG&E will not require all customers who would have received a recertification notice within the protection period (March 2020-June 2021) to recertify immediately upon the expiration of the protections. To this end, PG&E will spread out the recertification process for any customer that would have

<sup>35</sup> CARE Community Outreach Contractors List  
[https://www.pge.com/pge\\_global/common/pdfs/save-energy-money/help-paying-your-bill/longer-term-assistance/care/COC\\_Enhanced\\_Info\\_List.pdf](https://www.pge.com/pge_global/common/pdfs/save-energy-money/help-paying-your-bill/longer-term-assistance/care/COC_Enhanced_Info_List.pdf)



received a recertification notice during the protection period so that these customers receive notices between July and December 2021.

For example, assume that a CARE customer would have received a recertification notice on April 15, 2021 in the absence of emergency customer protections and that their recertification due date is July 15, 2021. Because we are not sending notifications to customers during the protection period, the earliest that this customer could receive a 90-day notice is July 1, 2021. This customer would receive the email and direct mail notifications and be removed from CARE or FERA if they do not recertify their eligibility by October 1, 2021.

However, as described above, not all customers that would have been required to recertify during the protection period will receive 90-day notices in July 2021. PG&E will spread these notices out over the remaining months in 2021 to promote a smooth transition back to the recertification process. Once customers successfully recertify their eligibility by their respective due dates, PG&E will use that date as their “anniversary date<sup>36</sup>” for future recertifications.

#### **3.2.1.1.2 Customers That Would Have Received a Recertification Notice on July 1, 2021 or Later**

If a customer’s recertification date was unaffected by the emergency customer protections and they would have received a recertification notice on July 1, 2021 or later, this customer will receive a recertification notice on their “anniversary date.” For example, a CARE customer that enrolled in CARE on October 15, 2019 and is not on a fixed income (i.e. recertifies every two years) would receive a 90-day notice on July 15, 2021 and be required to recertify by October 15, 2021 to remain in the program.

#### **3.2.1.1.3 Customers That Are Eligible for Automatic Recertification**

PG&E will automatically re-enroll customers that are in the deciles 1 and 2<sup>37</sup> for CARE/FERA based on PG&E’s propensity models.<sup>38</sup> Customers who are automatically re-enrolled will receive a communication that confirms re-enrollment and provides information on where to find additional financial support programs.

#### **3.2.1.2 Post-Enrollment Verification (PEV)**

PG&E conducts standard and high usage reviews to verify the eligibility of customers enrolled in the CARE and FERA programs. In a standard review, randomly selected customers must submit income documentation<sup>39</sup> to PG&E to verify their eligibility. For high usage reviews, a selection of electric customers with energy usage greater than 400% of their electric baseline allowance in their most recent bill must submit income documentation for all adults in the household to verify eligibility *and* participate in ESA within 45 days to remain in the program. Electric customers with electric usage above 600% of baseline in any monthly billing cycle receive requests requiring the customer to drop usage below 600% baseline within 90 days, submit official income documentation for all adults living in the household to establish eligibility,

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<sup>36</sup> A customer’s anniversary date is the date that the customer first enrolled in CARE/FERA.

<sup>37</sup> PG&E’s CARE propensity model assigns customers a decile score from 1 to 10, with 1 being the most-likely to be CARE-eligible and 10 being the least likely to be CARE-eligible.

<sup>38</sup> As required by D.12-08-044 OP 89, basic factors incorporated into the propensity models for recertification selection include: high energy use (including customers with usage above 400% baseline in any monthly billing cycle and above); annual bill amounts; household size; PRIZM or ZIP code; enrollment method; previously indicated customer ineligibility; customers previously de-enrolled from CARE; length of program enrollment; and length of time lapse since previously income verification.

<sup>39</sup> See Required Income Document Guide for CARE

[https://www.pge.com/pge\\_global/common/pdfs/save-energy-money/help-paying-your-bill/EN\\_income\\_guide.pdf](https://www.pge.com/pge_global/common/pdfs/save-energy-money/help-paying-your-bill/EN_income_guide.pdf)

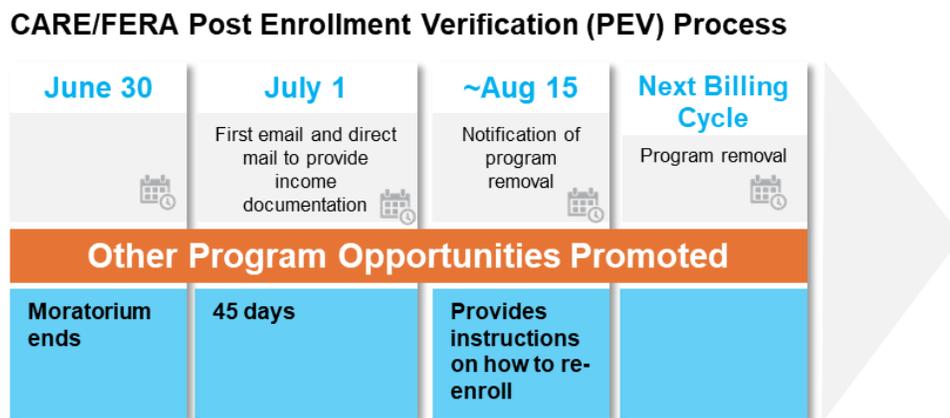


and also apply for the ESA program within 45 days. Prior to implementing emergency customer protections, an average of 8% of CARE participants annually received post-enrollment verification requests.

PG&E will reinstate both the standard and high usage review processes beginning July 1, 2021. PG&E will include messaging on the reinstatement of these processes as part of its web content and in communications on CARE/FERA recertification.

Participants who are required to complete a PEV will receive a notification requesting income documentation within 45 days. Consistent with our practice prior to the implementation of emergency customer protections, we will conduct PEVs throughout the course of the year (i.e., not all PEVs will occur once the protections expire). However, if a customer receives a PEV request on July 1, 2021, the earliest they could be removed from the CARE program is August 15, 2021 (see Figure 7 below).

**Figure 7. Timeline for Earliest Possible Date for CARE Post Enrollment Verification Process**



Customers are encouraged to enroll in other assistance programs throughout the process

### 3.2.2 Relief for Energy Assistance through Community Help (REACH)

For over 30 years, the Relief for Energy Assistance through Community Help (REACH) program has helped low-income families maintain utility service in times of hardship. Dollar Energy Fund, a non-profit organization, administers the REACH program from 170 offices in Northern and Central California.<sup>40</sup> REACH helps eligible customers<sup>41</sup> pay for energy during a crisis by providing an energy credit of up to \$300 based on the past due bill, subject to funding availability. The program is funded through tax-deductible contributions from PG&E customers and employees as well as charitable contributions from PG&E. To help better serve customers impacted by the COVID-19 pandemic, the REACH administrator began providing an additional \$100 in bill payment assistance in March 2020 to all self-identifying impacted income-eligible

<sup>40</sup> 2020 Program Reach Sites

[https://www.pge.com/pge\\_global/common/pdfs/save-energy-money/help-paying-your-bill/REACH-Agencies-by-County-2020.pdf](https://www.pge.com/pge_global/common/pdfs/save-energy-money/help-paying-your-bill/REACH-Agencies-by-County-2020.pdf)

<sup>41</sup> REACH eligibility: 1) Must have a residential account with a utility company in the name of an adult living in the household; 2) Must not have received REACH assistance within the past 12 months; 3) Must not exceed the REACH income guidelines, which are currently 200 percent above the federal poverty guidelines; and 4) Must have received either a 15-day or 48-hour disconnection notice (requirement suspended due to moratorium on disconnections, but will resume on July 1, 2021)



customers in PG&E's service territory. Thus, COVID-19 impacted income-eligible customers were eligible for an energy credit up to \$400 based on the past due bill, subject to funding availability. In 2020, approximately 3,100 customer households participated in REACH.

Beginning July 1, 2021, the additional \$100 for bill payment assistance will no longer be made available to customers. However, subject to availability, customers will still be able to apply to receive a one-time energy credit annually for up to \$300. PG&E will continue to promote awareness of REACH funding after the protections expire to help customers that need bill payment assistance as described in Section 2. Efforts will also be made to increase the non-taxable donations from customers and employees to expand the funding available to support customers that are struggling to pay their bills.

### **3.3 Medical Baseline Program Emergency Customer Protections**

The Medical Baseline (MBL) program is an assistance program for residential customers who have additional energy needs due to qualifying medical conditions.<sup>42</sup> In the absence of emergency customer protections, new MBL enrollees must resume providing certification from a qualified medical practitioner that they meet the eligibility requirements. Customers certified by their qualified medical practitioner that their medical condition is permanent self-certify<sup>43</sup> their eligibility every two years and do not require additional certification from a qualified medical practitioner. However, customers whose medical condition is not permanent must provide certification from a qualified medical practitioner every two years to remain enrolled in the program.

Due to COVID-19's unique impact on our customers' ability to see their medical practitioners, PG&E voluntarily implemented protections to support MBL customers in March 2020 by pausing all customer removals from the program, no longer sending forms to customers that require them to re-certify through a qualified medical practitioner, and allowing customers to enroll in the program without certification from a qualified medical practitioner.<sup>44</sup> PG&E also conducted additional outreach in support of our PSPS program. Program enrollment increased by over 29% since March 2020.

Beginning July 1, 2021, PG&E will lift voluntarily implemented protections for the MBL program:

- New customers enrolling in the program will be required to obtain a certification from a qualified medical practitioner;
- Customers who are due for recertification and do not have a permanent disability will receive a 75-day reminder on July 1, 2021 at the earliest;
- Customers who are due for self-certification and have a permanent disability will receive a 60-day reminder on July 1, 2021 at the earliest.

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<sup>42</sup> MBL offers 1) an additional allotment of energy every month at the lowest price available on their rate; and 2) additional notifications in advance of a PSPS event.

<sup>43</sup> Via self-certification, MBL customers are asked to confirm that they are still a full-time resident in the address and their contact information is up-to-date for PSPS event notifications.

<sup>44</sup> For more information, see PG&E Advice 4227-G/5784-E and supplements.



To help simplify the enrollment and recertification process, PG&E plans to align the expiration of emergency customer protections with the launch of a new online medical practitioner portal on July 1, 2021.

<sup>45</sup> This new online portal will provide efficiencies to the medical baseline enrollment and recertification processes by reducing the time spent completing required program forms and eliminating the manual process between the customer and their medical practitioner. When customers complete an enrollment/recertification form through this new online portal, they will be sent a confirmation email with a web link and a confirmation number to share with their medical practitioner. The medical practitioner would use this link and confirmation number to certify their patient's medical needs on PG&E's new medical practitioner portal. Customers will continue to have the option to complete a paper enrollment/recertification form.

As PG&E launches our online medical practitioner portal, we will proactively communicate with healthcare providers, in-home care providers, and medical baseline customers regarding use of the new portal for recertification via emails and content on the PG&E webpage.

Customers who do not recertify will be removed from the MBL program within 1-2 billing cycles.<sup>46</sup> Accordingly, the earliest that a customer could potentially be removed from the medical baseline program is September 2021 (see Figure 8). If a customer requires additional time to complete the recertification process, the customer can request a 30-day extension by calling the PG&E call center. PG&E will follow up directly with the customer within the 30-day extension if no action has been taken.

#### **Medical Baseline Portal**

PG&E plans to launch a new online medical practitioner portal on July 1, 2021. The portal will enable qualified medical practitioners to certify a customer's eligibility for the MBL program online.

The portal will provide efficiencies by reducing time spent completing paper forms and eliminating the manual exchange of paper forms between the medical practitioner and customer.

PG&E will proactively communicate with healthcare providers, in-home care providers, and customers regarding use of the new portal via email outreach and content on the PG&E website.

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<sup>45</sup> See Advice 3998-G-A/5342-E and supplements.

<sup>46</sup> PG&E is committed to ensuring the safety of customers that were previously enrolled in the medical baseline program, but did not recertify themselves in the program in a timely manner during the wildfire season. MBL customers receive additional notifications for plan/unplanned outages and PSPS events. Customers who did not recertify will continue to receive the additional notifications for planned/unplanned outages and PSPS events for 90 days after removal from medical baseline program.. However, they will not be receiving the additional energy allotment unless they re-enroll into the medical baseline program (if applicable).



Figure 8. Timeline for Earliest Possible Date for Medical Baseline Recertification Processes

### Medical Baseline Recertification Process Through Medical Practitioner



### Medical Baseline Self-certification Process





## 4 Operational Support and Training

### 4.1 Call Center Operations

PG&E trains our call center staff to ensure that they can provide information to customers on relevant assistance programs.<sup>47</sup> PG&E’s CSRs are the voice of our company and serve as trusted advisors to our customers. They must be clear and confident communicators who have a constant focus on safety and the customer at all times. CSRs provide front-line support to our customers by telephone, email, and written correspondence. Once COVID-19 emergency customer protections expire, PG&E anticipates that the resumption of normal business activities will substantially increase call volume to our call center. PG&E is hiring additional CSRs to help address any increases in call volume to mitigate long wait times. Furthermore, to ensure our CSRs have the right information and tools to best support our customers, PG&E will provide robust virtual training to all our CSRs throughout June 2021.<sup>48</sup> All CSRs will receive a training on how to effectively have high bill conversations with our customers. In addition, our Customer Service Operations Support Communication team is also developing a detailed communication plan to promote and reinforce the tools and resources our CSRs can use during discussions with our customers. Our training and communication plan will prepare our employees to provide meaningful support to customers, who are experiencing financial difficulty and/or hardship.

PG&E recognizes that customers may have differing priorities and challenges to address during these difficult times. PG&E is focused on tailoring our engagement efforts to address the needs of each individual customer. PG&E’s CSRs have been trained to work with customers to provide customers with multiple options to address issues they may face as COVID-19 emergency customer protections expire. Messaging will be tailored to customer needs and eligibility requirements for specific programs. Table 6 describes the example messaging CSRs use to offer programs/services.

#### PG&E’s Call Center Objectives

The ultimate customer experience is the singular goal and objective of PG&E’s call center. We strive to gain our customers’ trust, one phone call at a time by:

1. Aiming to provide first-call satisfaction
2. Providing energy and money saving tools for our customers
3. Using our survey scores to find new methods to enhance the customer experience
4. Partnering with our PG&E colleagues to ensure customer satisfaction

***To ensure we support our customers during the transition, we are hiring additional CSRs to help address any increases in call volume and mitigate long wait times.***

<sup>47</sup> Resolution M-4849, p. 13.

<sup>48</sup> PG&E will conduct all activities safely and in compliance with all appropriate state and local health orders. To ensure the safety of our employees and compliance with state and local COVID-19 health orders, PG&E will conduct virtual trainings with CSRs until it is safe to begin conducting in-person trainings.

Table 6. Example messaging CSRs use to offer programs/services

Target Audience	General Support – Not Income-Qualified	Financial Assistance – Income -Qualified	Emergency Help with Bills – Special Programs (LIHEAP, AMP, REACH)
Key Messages	PG&E is committed to helping customers. We offer bill payment options that can help you better manage your bill.	In these difficult times, we're dedicated to serving our customer's needs. Together we can find solutions that work for you.	If you are struggling to pay your energy, we offer special relief and bill assistance programs.
Support Statements	<ul style="list-style-type: none"> <li>• PG&amp;E is providing advance notice to customers who are past due that existing shutoff protections will be ending but help is available to assist with the transition.</li> <li>• We offer convenient ways to pay:               <ol style="list-style-type: none"> <li>1. <b>Flexible payment arrangements</b></li> <li>2. <b>One-time payments</b></li> <li>3. <b>Recurring payments</b></li> <li>4. <b>Budget Billing</b></li> </ol> </li> <li>• Take advantage of our tools and resources:               <ul style="list-style-type: none"> <li>○ Set up <b>Energy Alerts</b></li> <li>○ Find the best <b>Rate Plan option (TOU)</b></li> </ul> </li> <li>• Customers can visit <a href="http://pge.com/billhelp">pge.com/billhelp</a> or call us at <b>1-800-743-5000</b>.</li> </ul>	<p>For customers who qualify, we offer additional ways to save:</p> <ol style="list-style-type: none"> <li>1. <b>California Alternative Rates for Energy Program (CARE)</b> offers a monthly discount of 20% or more on gas and electricity.</li> <li>2. <b>Family Electric Rate Assistance Program (FERA)</b> provides a monthly discount of 18% on electricity only. Must be a household with three or more people.</li> <li>3. <b>Medical Baseline</b> provides customers with additional energy needs an additional allotment of energy at a lower rate on their monthly energy bills.</li> </ol> <ul style="list-style-type: none"> <li>• Customers who are past due will still be responsible for their entire bill amount, but they can qualify for bill savings and defer payments without worry.</li> </ul>	<ul style="list-style-type: none"> <li>• To further assist customers facing a possible shutoff, PG&amp;E will be offering eligible customers additional help. Impacted customers may qualify for:               <ol style="list-style-type: none"> <li>1. <b>LIHEAP</b></li> <li>2. <b>AMP</b></li> <li>3. <b>REACH</b></li> </ol> </li> <li>• Disconnecting service is a last resort. We want to work with customers to set up pay plans and enroll them in our bill assistance programs.</li> <li>• PG&amp;E will work with our customers to find viable solutions based on their needs. Customers can visit <a href="http://pge.com/financialassistance">pge.com/financialassistance</a> or contact us at <b>1-800-743-5000</b>.</li> </ul>



Resolution M-4849 encourages PG&E to consider the appropriate method of customer communication, including non-English languages and forms for communication to reach people with disabilities and other access and functional needs.<sup>49</sup> PG&E's Contact Center offers accessibility and translation services and is equipped to provide translation support in over 250 languages. PG&E also offers customers materials in alternative formats such as braille, large print, and audio. Our CSRs are committed to putting in the time to ensure customers are informed and educated about all their options for bill relief or bill management.

## 4.2 Small Business Advisors

PG&E recognizes that businesses need help and are looking for opportunities and partnerships to help ensure their survival. PG&E provides support to our small business customers through unassigned small business advisors. Our small business advisors aim to empower customers to make well-informed decisions to help reduce their carbon footprint and save energy and money. Our small business advisors enhance the customer experience by providing access to industry resources and information, leveraging local community partnerships, and providing excellent customer service. We train our advisors on a bi-annual basis through Customer Relationship Management (CRM) Essentials. In May 2021, PG&E's unassigned small business advisors will be trained on existing solutions and on any new solutions that will be launched to help address the challenges our small business customers are seeing due to COVID-19.

## 4.3 Corporate Security Department

PG&E is dedicated to serving our customers and protecting them during these difficult times. We are a proud member of Utilities United Against Scams.<sup>50</sup> Throughout PG&E's service territory, bad actors may try to gain access to customer account information, entry into a home or business, or try to obtain undue payment. As the COVID-19 pandemic continues to impact the United States, bad actors are employing text-message campaigns and robocalls to prey on virus-related fears<sup>51</sup>. PG&E has a dedicated number for customers to report questionable activities: 833-500-SCAM (7226). Customers can call this number at any time to report misinformation. For customers who suspect a phishing attempt, the customer can email: [ScamReporting@pge.com](mailto:ScamReporting@pge.com). The PG&E Corporate Security Department and the authorities will investigate all cases. PG&E also provides several tips to customers to avoid fraudulent activities at: [www.pge.com/scams](http://www.pge.com/scams). PG&E CSRs and small business advisors have been trained to be sensitive to our customers' needs and preferences. CSRs and small business advisors will never ask customers for their financial information over the phone. PG&E is also coordinating with CBOs to prevent the spread of misinformation and help customers receive appropriate information about programs and services to help with bill management and debt relief, as described in Section 2.5.2.

## 5 Stakeholder Feedback on Our Transition Plan

PG&E is focused on listening to our customers and key partners to understand the needs and desires of our customers who have been impacted by the COVID-19 pandemic. PG&E has met with several stakeholder groups to gather feedback in our design and implementation of the COVID-19 emergency customer protections transition plan as well as identify opportunities to

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<sup>49</sup> Resolution M-4849, p. 13.

<sup>50</sup> UUAS is a consortium of more than 100 U.S. and Canadian electric, water, and natural gas utilities (and their respective trade associations). UUAS is dedicated to combating impostor utility scams by providing a forum for utilities and trade associations to share data and best practices, in addition to working together to implement initiatives to inform and protect customers.

<sup>51</sup> Federal Communications Commission COVID-19 Consumer Scams  
<https://www.fcc.gov/covid-scams>.



improve our support to our customers. Feedback was obtained through a variety of channels, as described in further detail below. See Appendix A – Stakeholder Feedback for a detailed summary of the feedback and key themes that will guide PG&E’s actions.

### **5.1.1 Community-Based Organization and Agency Focus Group**

PG&E recognizes the critical role that CBOs play in connecting with our customers, particularly those that are harder to reach, such as customers with disabilities and communities of color. We hosted a CBO/agency focus group on January 27, 2021 and over 40 external stakeholders attended, including 15 LIHEAP providers, two organizations representing customers with disabilities, representative of the LIOB, as well as representatives from the CPUC and CSD. During the focus group, we solicited feedback from the CBOs and agencies on what our top priorities should be in supporting customers during the transition and what else we should do to support our customers. From this conversation, we received constructive feedback on how to improve coordination with LIHEAP providers, the need for clear and direct information (i.e. clarifying the consequences of not paying the bill), and general suggestions for methods of communication and outreach, as summarized in People with Disabilities and Aging Advisory Council (PWDAAC).

### **5.1.2 People with Disabilities and Aging Advisory Council (PWDAAC)**

PG&E organized a focus group with the PWDAAC members and other organizations representing customers with access and functional needs (AFN) on February 26, 2021. During the focus group, we solicited feedback from the PWDAAC on outreach efforts related to the expiration of COVID-19 emergency customer protections and information dissemination for AFN customers. The PWDAAC feedback focused on the specific needs and preferences of AFN customers when planning outreach and marketing activities and preferences on communication channels and message formatting.

### **5.1.3 Low-Income Oversight Board**

PG&E gleaned insights from the LIOB meeting on March 11, 2021. Alongside the other investor-owned utilities (IOUs), PG&E presented our estimated earliest high-level timeline of key activities as well as our marketing, education, and outreach strategies for the expiration of COVID-19 emergency customer protections. During the LIOB meeting, we solicited feedback from both the LIOB and CPUC. The LIOB feedback focused on the specific needs and preferences of low-income customers. From this conversation, we received feedback on segmenting and targeting customers based on their level of need, streamlining customer interactions by bundling programs and services, the need for plain, simple, and easy to understand language in customer communications, and the need to educate customers about the prevalence of fraudulent activities and how to avoid them.

In addition, the LIOB submitted a letter to the Commission on March 24, 2021 providing recommendations on the IOU’s transition plans<sup>52</sup>. The LIOB letter noted that *many of the recommendations included are beyond Resolution M-4849’s limitations*. Where possible, PG&E has incorporated the recommendations from the LIOB into our transition plan.

### **5.1.4 Low-Income and Communities of Color Advisory Panel**

On March 17, 2021, PG&E hosted the Q1 2021 meeting of its Low-income and Communities of Color Advisory Panel and presented its communication and outreach plan related to the expiration of COVID-19 emergency customer protections. Members broadly supported the

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<sup>52</sup> Low-Income Oversight Board Letter on Resolution M-4849 and Related Matters.



plan's focus on utilizing multiple marketing and outreach channels, including non-digital methods. PG&E also received helpful input on outreaching strategies for hard-to-reach customers, including the need for a "high-touch" approach of investing more time and resources into reaching those with the most significant barriers to accessing information and resources. Advisory panel members also described the high prevalence of misinformation targeting low-income communities, and the importance of ensuring that PG&E's messaging – be it delivered directly by PG&E or through a third-party – can clearly be distinguished from fraudulent activities. Members noted success with the REACH program and pointed to the need for a more streamlined application approach for customers applying to multiple programs. PG&E also received input from members on the need for a communication strategy that utilizes ethnic media, such as radio, newspapers, TV, and is tailored to reach community members where they are, such as by having informational resources available in a local supermarket that specializes in products for a specific ethnic group.

#### **5.1.5 Small and Medium-Sized Business Focus Group**

In January 2021, we conducted research with our small and medium-sized business (SMB) customers who are members of our Business Advisory Forum (an SMB online community) to get a better understanding of the multitude of effects the COVID-19 pandemic has had on them, and to identify customers who would be interested in talking with us further about how they prioritize their bills, and what support they would like from PG&E. Based on this research, we conducted four small focus groups. We received feedback on the need to identify additional programs and services to help support our small business customers impacted by the COVID-19 pandemic and the need to serve as a partner to small businesses by increasing awareness of available programs and services and finding solutions that meet their needs.



## 6 Benchmarking with Other Utilities and Research

In developing our transition plan, PG&E considered best practices and lessons learned from utilities and industry leaders throughout the U.S. For many non-California utilities, disconnection moratoriums and other customer protections ended in 2020. With such high numbers of customers behind on their bills, many of these utilities needed to adjust their collections and assistance strategies as they moved out of disconnection moratoriums.

### ***Early and Ongoing Customer Communications via Multiple Communication Channels***

Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company (Ohio Companies) recognized the importance of early communications to prepare their customers and set forth a milestone of notifying customers 21 days prior to the resumption of disconnections.<sup>53</sup> PG&E is following a similar practice of early communications, driving broad awareness of the transition starting Q1 2021. Further, the Ohio Companies leveraged a multi-channel approach as part of their communications plan.<sup>54</sup> PG&E's ME&O plan features multiple channels to ensure our customers and communities are aware of the timing of the expiration of COVID-19 emergency customer protections, and have clear information about the programs and resources we have to help them throughout this transition.

BC Hydro and Austin Energy found it challenging to reach customers during moratoriums. Customers who received a disconnect notice had more incentive and urgency to reach out to the utility to enroll in a payment arrangement than customers who did not receive a notice. While neither found a specific communication channel to be particularly effective, both proactively reached out to customers in new ways. They took advantage of low call center volumes and had agents proactively call customers who were behind on bills.<sup>55</sup> PG&E has taken a similar approach in leveraging our CSRs who perform proactive outbound calls to our residential and small business customers, as discussed in detail in Section 3.1.1.

### ***Informing Customers about Financial Assistance Programs***

The 2020 E Source COVID-19 Residential Survey notes that many of our customers who have lost income because of the pandemic need financial help for the first time. The need is greater to message bill-relief programs to all customers, not just the historically low-income ones. Findings recommend communicating regularly about who qualifies for billing programs and how to apply. Other recommendations included combining bill-relief programs with energy saving programs to help customers adopt energy saving behaviors. E Source's research suggests that customers appreciate utilities promoting flexible pay plans and offering tools to control their bill such as budget billing payment alerts.<sup>56</sup> We are taking a similar approach with our communications as highlighted in Section 2.

Utilities found creative ways to reach their customers and inform them of financial assistance options. For example, National Grid and Eversource hosted multi-lingual web conferences, and Austin Energy used its community partnerships to help get customers assistance in a holistic way. Similarly, PG&E plans to leverage our network of CBOs, as trusted members of their

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<sup>53</sup> Transition Plan and Request for Waivers of Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company. p.4

<sup>54</sup> Ibid, p.8

<sup>55</sup> "Shutoff moratoriums are ending—now what?." E Source, December 2020.

<sup>56</sup> E Source, 2020 COVID 19 Residential Survey.



communities, to drive awareness of our financial assistance offerings, as described in Section 2.5.2.

Providing customers with clear information on how they can get assistance through LIHEAP was an important strategy for many utilities as many customers are seeking this kind of assistance for the first time. For example, PPL Electric Utilities (PPL) promoted LIHEAP on its website with a link to the online application, a downloadable application, and contact information for local assistance offices.<sup>57</sup> Like PPL, we recognize the value of helping our customers understand the financial assistance that LIHEAP can offer, and have a dedicated webpage with information on the program and links to help customers access funding. Promoting LIHEAP is an important feature of our transition plan.

Sacramento Municipal Utility District (SMUD) is leaning heavily on strategic account advisors to proactively reach out and check on business customers via phone and email.<sup>58</sup> Many of these customers have never fallen behind on their power bill but with many businesses shut down due to the COVID-19 pandemic, they are struggling to make payments. SMUD is proactively communicating payment plan options to its business customers. PG&E has taken a similar approach and our Credit Operations team will be proactively calling our approximately 56,000 small business customers, as discussed in detail in Section 3.1.1.

## 7 Program Metrics

Resolution M-4849 requires PG&E to include a plan for reporting metrics on activities in the timeline, and present metrics we will track and report to monitor success in achieving the goal of effectively easing customers through the transition.<sup>59</sup> Specifically, the Commission requires PG&E to include a progress metric for each of the following areas:

- Customers that enrolled in a bill assistance program when protections were in place are successful in sustaining their enrollment in the program if they still meet eligibility criteria
- New enrollments of impacted customers in payment programs since beginning implementation of the transition plan.

### ***What Success Looks Like:***

- Keep our customers connected by:
  - Ensuring that customers that are eligible and interested remain enrolled in rate discounts and bill assistance programs
  - Helping impacted and eligible customers enroll in new payment programs

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<sup>57</sup> “Help your customers get LIHEAP benefits during COVID-19.” E Source, May 2020

<sup>58</sup> “Confronting the billing and payment challenges raised by COVID-19.” Chartwell, April 2020

<sup>59</sup> Resolution M-4849, p. 15.



We will use the proposed metrics outlined in Table 3 to gauge our success in meeting our objectives. PG&E will include baseline data and the first month of data for each metric in the monthly reports required in R.18-07-005. PG&E will report these metrics for one year, until June 30, 2022.

**Table 3. Transition Plan Metrics and Methodology**

Progress Metric	Methodology
<b>Retention of customers enrolled between 3/16/2020 – 6/30/2021</b>	
Percentage of customers that complete PEV for CARE	Data Set: Customers enrolled in CARE during the protections period (3/16/2020-6/30/2021) Method: The number of customers that successfully complete PEV after June 30, 2021 divided by the number of customers requested to complete PEV, based on the static data set.
Percentage of customers that complete PEV for FERA	Data Set: Customers enrolled in FERA during the protections period (3/16/2020-6/30/2021) Method: The number of customers that successfully complete PEV after June 30, 2021 divided by the number of customers requested to complete PEV, based on the static data set.
Number of customers that remain on AMP	Data Set: Customers enrolled in AMP during the protections period (3/16/2020-6/30/2021) Method: The total number of customers that enrolled in AMP during the protection period, based on the data set, minus those who dropped out of AMP, starting July 1, 2021.
Number of residential and small business customers remain on a 12-month payment plan	Data Set: Customers enrolled in a 12-month payment plan during the protections period (3/16/2020-6/30/2021) Method: The total number of customers that enrolled in a 12-month payment plan during the protection period, based on the data set, minus those customers who dropped out of payment plans, starting July 1, 2021.
<b>New enrollments of impacted customers in payment programs starting 7/1/2021</b>	
<b>Bill Payment Assistance Programs</b>	
Number of new monthly residential customer's participating in AMP	The incremental number of residential customers that receive assistance from AMP each month, starting July 1, 2021
Number of new monthly residential customer's participating in LIHEAP	The incremental number of residential customers that receive assistance from LIHEAP each month, starting July 1, 2021
Number of new monthly residential customer's participating in REACH	The incremental number of residential customers that receive assistance from REACH each month, starting July 1, 2021
<b>Residential Payment Plans</b>	
Number of new enrollments in residential payment plans (broken out by 1-3 months, 4-6 months, 7-9 months, 10-12 months, > 12 months)	The incremental number of residential customers that enroll in a payment plan each month, starting July 1, 2021



Number of kept payment plans for residential customers (broken out by 1-3 months, 4-6 months, 7-9 months, 10-12 months, >12 months)	The total number of residential payment plans that are kept each month, starting July 1, 2021
Number of broken payment plans for residential customers (broken out by 1-3 months, 4-6 months, 7-9 months, 10-12 months, >12 months)	The total number of residential payment plans that are broken each month, starting July 1, 2021
<b>Small Business Payment Plans</b>	
Number of new small business enrollments in payment plans (broken out by 1-3 months, 4-6 months, 7-9 months, 10-12 months, > 12 months)	The incremental number of new small business customers that enroll in a payment plan each month, starting July 1, 2021
Number of kept payment plans for small business customers (broken out by 1-3 months, 4-6 months, 7-9 months, 10-12 months, >12 months)	The total number of small business payment plans that are kept each month, starting July 1, 2021
Number of broken payment plans for small business customers (broken out by 1-3 months, 4-6 months, 7-9 months, 10-12 months, >12 months)	The total number of small business payment plans that are broken each month, starting July 1, 2021



## 8 Budget

Resolution M-4849 encourages PG&E to use existing ME&O budgets to the extent practicable to implement its transition plan.<sup>60</sup> To the extent that PG&E believes that it cannot leverage only existing ME&O budgets, Resolution M-4849 directs PG&E to note the cost estimate, describe details of the incremental new activity, and use the CPPMA to record and track incremental costs associated with transition plan implementation.<sup>61</sup>

At this time, PG&E anticipates that it can complete the required ME&O as described herein through existing budgets and does not forecast incurring incremental costs for these activities.

## 9 Statewide IOU Coordination

Resolution M-4849 explains that statewide consistency in administering the transition plans is critical for the following reasons:<sup>62</sup>

1. Eases confusion and/or increases efficiencies for customer facing entities supporting IOUs in executing the ME&O strategy
2. Reduces challenges for call centers receiving customers reports from customers across multiple utilities; and
3. Eases processing and interactions between regulators and utilities as utilities report on their implementation of the plan.

PG&E meets with the other IOUs on a weekly basis to evaluate potential areas for consistency and share best practices. As a result of these meetings, we aligned with the other IOUs on the following key elements of our transition plan:

### ***Marketing Outreach and Education***

- IOUs will use similar channels (e.g., web, email, direct mail etc.) to inform customers about the expiration of the emergency customer protections and about the financial assistance and rate discount programs we have to support them
- IOUs plan to perform “pre-transition” communications
- Each IOU intends to begin notifying customers about the end of the COVID-19 emergency customer protections **at least 60 days before** the end date

### ***Benefit Programs***

IOUs are aligned on the benefit programs that they plan to offer customers, including but not limited to AMP, LIHEAP, 12-month payment plans, CARE/FERA, ESA, and other bill relief program like PG&E’s REACH program.

### ***Resumption of Activities***

- Disconnections: no customer will be immediately at risk for disconnection once the emergency customer protections expire. All IOUs will ramp up collections related activities over time giving customers the opportunity to receive and react to marketing and outreach efforts.
- Length of Payment Plans: residential and small business customers will be offered payment plans up to 12 months
- Deposits and Reconnection Fees

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<sup>60</sup> Resolution M-4849, p. 17.

<sup>61</sup> Resolution M-4849, p. 17.

<sup>62</sup> Resolution M-4849, pp. 13-14.



- Deposits and reconnections fees for residential customers are permanently eliminated pursuant to D.20-06-003
- Deposits and reconnection fees for small business customers will resume on July 1, 2021
- CARE, FERA, MBL, and ESA Programs
  - Reinstating re-certification requirements for CARE, FERA, and MBL
  - No change for ESA (activities resumed in May/June 2020)

## 10 Compliance and Safety

Resolution M-4849 requires PG&E to provide the following information in support of compliance and safety:

- An explanation of how the transition plan aligns with program enrollment targets, eligibility requirements, and customer protections in effect outside emergency customer protections;
- The number and percentage of unique customers (by zip code) who are more than 90 days in arrears, or not enrolled in a payment plan, or have more than \$250 in total arrears; and
- A discussion of how the transition plan ensures that activities are safe and consistent with all appropriate state and local health orders.

PG&E discusses these issues in further detail below.

### 10.1 Alignment with Other Program Targets and Requirements

PG&E recognizes that the emergency customer protections are cross-cutting and impact a number of customer programs and proceedings. To this point, Resolution M-4849 emphasizes the importance of the IOUs explaining how their transition plans align with program enrollment targets, eligibility requirements, and customer protections in effect outside the emergency customer protections. PG&E is committed to continuing to meet all related regulatory compliance requirements, which includes but is not limited to:

- Continuing to increase awareness of CARE/FERA to promote enrollment;
- Conducting CARE/FERA post enrollment verification as applicable;
- Complying with all disconnection policies identified in D.20-06-003, including not exceeding the disconnection cap;
- Providing an online LIHEAP pledge portal by March 2021;<sup>63</sup>
- Launching a new online portal that enables qualified medical practitioners to e-sign Medical Baseline applications;<sup>64</sup> and
- Offering training to county health works that conduct in-home visits prior to Q2 2021<sup>65</sup>

### 10.2 Arrearage Data

Resolution M-4849 requires PG&E's transition plan to include the number and percentage of unique customers, by zip code who are:<sup>66</sup>

- More than 90 days in arrears;

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<sup>63</sup> D.20-06-003, OP 27.

<sup>64</sup> D.20-06-003, OP 36.

<sup>65</sup> D.20-06-003, OP 37.

<sup>66</sup> Resolution M-4849, p. 14.



- Not enrolled in a recent applicable payment plan or conventional extended payment plan;
- More than \$250 in total arrears

PG&E includes this data in Appendix E – Arrearage Data.

### 10.3 Alignment with State and Local Health Orders

PG&E will conduct all activities safely and in compliance with all appropriate state and local health orders. This includes ensuring that all PG&E employees interacting with customers follow applicable health orders such as wearing a face covering and social distancing.

PG&E's customer service offices are currently closed in compliance with state and local safety protocols for COVID-19. To ensure the safety of our customers and employees and compliance with state and local COVID-19 health orders, PG&E's offices will remain closed until they are permitted to be reopened. PG&E will continue to encourage customers to utilize other payment options and provide assistance accessing payment options as needed. PG&E offers the following convenient payment methods:

- **Automatic Payments:** Customers can sign up for recurring payments. Utility bills are automatically paid from a credit card, debit card, or bank account. Customers can set start and stop dates for recurring payments and a maximum payment amount.
- **Pay Online:** Customers can pay online as a registered user or as a one-time user with no registration required.
- **Pay by Phone:** Customers can call 1-877-704-8470 to pay their utility bill.
- **Pay by Mail:** Customers can pay by mail by making their check payable to PG&E and sending it along with their energy statement remittance stub to PG&E P.O. Box 997300, Sacramento, CA 95899-7300.
- **Pay in Person:** Customers can pay at a neighborhood payment center (NPC).<sup>67</sup> Currently, PG&E offers 600 NPCs for our customers who prefer to pay cash.

In addition, PG&E will continue to implement virtual options for customers to limit contact with individuals outside their household. For example, as discussed in Section 3.3, PG&E is launching an online portal that will enable customers to obtain authorization from a qualified medical practitioner to enroll in or re-certify eligibility in the Medical Baseline program without an in-person visit. In addition, PG&E will continue to conduct trainings virtually with its community outreach contractors and other CBO partners to inform them of program eligibility requirements and other relevant information.

PG&E will monitor developments and governmental directives and they reserve the right, in consultation with Staff, to postpone implementation of some or all of the provisions of this Plan as necessary to ensure the safety of employees, customers, and the general public.

## 11 Conclusion

COVID-19 emergency customer protections are set to expire on June 30, 2021. PG&E's Transition plan includes ME&O designed to ease customers' transition from COVID emergency

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<sup>67</sup> PG&E offices are temporarily closed. Neighborhood payment centers may be open. Customers can locate a payment center using PG&E's Payment Center Locator: [https://www.pge.com/en\\_US/residential/your-account/your-bill/ways-to-pay/pay-center-locator/pay-center-locator.page](https://www.pge.com/en_US/residential/your-account/your-bill/ways-to-pay/pay-center-locator/pay-center-locator.page).



protections. PG&E's "pre-transition" ME&O efforts support customer-centric objectives including 1) driving enrollment in programs that help our customers manage their bills, 2) helping customers manage unpaid bills that have accumulated over the past year and 3) working to ensure that customers are informed about any changes to programs in which they are currently enrolled.

To achieve these objectives, PG&E will continue to listen to our customers and community partners, solicit feedback, and take action to optimize communications, communication channels, and the use of resources, and will measure meaningful and tangible outcomes including new and sustained enrollment in bill assistance programs and new enrollments of impacted customers in payment programs since beginning implementation of the transition plan, thus achieving the goal of effectively easing customers through the transition.



## Appendix A – Stakeholder Feedback

Themes	CBO and Agency Focus Group	People with Disability & Aging Advisory Council (PWDAAC)	Low-Income and Communities of Color Advisory Panel	SMB Focus Groups	Incorporated into Transition Plan
<b>Consider Customers' Needs</b>	<ul style="list-style-type: none"> <li>• Fear in community around deposits and payment plans</li> <li>• Customers do not know the consequences of not paying bill(s)</li> <li>• Many elderly do not use email, text, web</li> </ul>	<ul style="list-style-type: none"> <li>• Many low income and/or older adults do not have email</li> <li>• 35% of adults with disabilities do not have access to internet</li> <li>• Some low income/older adults have low reading level</li> </ul>	<ul style="list-style-type: none"> <li>• High prevalence of bad actors targeting low-income communities</li> </ul>	<ul style="list-style-type: none"> <li>• A common mentality has been to cut everything off that isn't essential</li> <li>• SMB want to be rewarded, or acknowledged, for their loyalty to PG&amp;E</li> </ul>	<ul style="list-style-type: none"> <li>• Communicating early and with repetition on protections ending and customers' options</li> <li>• Multi-lingual and multi-channel campaigns</li> <li>• Incorporated best practices and lessons learned from AFN Plan</li> </ul>
<b>Getting the Word Out</b>	<ul style="list-style-type: none"> <li>• Snail mail works with our target populations</li> <li>• Use PG&amp;E's meter reads or field workers to provide info</li> <li>• Host online community meetings</li> <li>• Create 2-1-1 or 8877 text alerts</li> </ul>	<ul style="list-style-type: none"> <li>• Snail Mail, TV/Radio Ads, and CBOs are preferred</li> <li>• Radio important for blind/low vision</li> <li>• Use DCARA's YouTube channel to post in ASL</li> <li>• Use existing channels (e.g., senior centers, food banks)</li> </ul>	<ul style="list-style-type: none"> <li>• Need a "high-touch" approach of investing more time and resources into reaching those with the most significant barriers</li> </ul>	<ul style="list-style-type: none"> <li>• SMBs are generally not aware of PG&amp;E programs and resources</li> <li>• Employ empathy when engaging with SMB customers</li> </ul>	<ul style="list-style-type: none"> <li>• Offering materials in alternative formats</li> <li>• Engaging multi-cultural news orgs, press releases, radio spots, etc.</li> <li>• Providing ESA contractors with program info and data to target customers</li> <li>• Leveraging CBOs, advisory groups, community associations, civic groups</li> </ul>
<b>Clear, Direct, and Meaningful Communications</b>	<ul style="list-style-type: none"> <li>• No such thing as overcommunication</li> <li>• Use clear language</li> <li>• Outline options in bills</li> </ul>	<ul style="list-style-type: none"> <li>• No such thing as overcommunication</li> <li>• Use multiple channels of communication</li> </ul>	<ul style="list-style-type: none"> <li>• Use multiple channels and ensure messaging is clearly from PG&amp;E</li> </ul>	<ul style="list-style-type: none"> <li>• Need to understand the specific needs by industry for meaningful ME&amp;O</li> </ul>	<ul style="list-style-type: none"> <li>• Multi-lingual/multi-channel campaigns</li> <li>• Conducted customer outreach/message testing</li> <li>• Data-driven targeting to ensure comms are relevant</li> </ul>
<b>Bundling Programs and Services</b>	<ul style="list-style-type: none"> <li>• Need to educate all customers on all available options</li> <li>• Bundle programs and streamline enrollment</li> </ul>	<ul style="list-style-type: none"> <li>• Need options for customers to complete multiple actions with single contact</li> <li>• Cross promote with other programs</li> </ul>		<ul style="list-style-type: none"> <li>• Capital-heavy investments not feasible</li> <li>• Anticipate customers' needs and work out flexible arrangements</li> </ul>	<ul style="list-style-type: none"> <li>• Centralized "hub" of info and links to programs on website</li> <li>• CSRs trained to provide customers with multiple options during phone call</li> </ul>
<b>Coordinating with Partners</b>	<ul style="list-style-type: none"> <li>• Create a warm handoff with LIHEAP agency/LSPs</li> <li>• Establish more lines of communication with LSPs</li> <li>• Continue to train LSPs</li> <li>• Create bill inserts for LSPs</li> <li>• Pay CBOs to conduct outreach</li> </ul>	<ul style="list-style-type: none"> <li>• Outreach is most effective when it comes from trusted organizations</li> <li>• Partner with County Public Authorities to reach In Home Support Services customers</li> <li>• Develop an ILC toolkit</li> </ul>		<ul style="list-style-type: none"> <li>• Act as a partner and support small business customers by listening to their needs and curating resources to help them in their current financial situation</li> </ul>	<ul style="list-style-type: none"> <li>• Engaged with 250 CBOs who support PSPS, 40 that serve income-qualified programs, and 25 that support TOU</li> <li>• Implementing database to manage CBO comms</li> <li>• Forming team to coordinate CBO involvement</li> <li>• Conducting trainings with CARE contractors</li> <li>• Providing literature for sharing through CBOs</li> </ul>
<b>Operations</b>	<ul style="list-style-type: none"> <li>• Ensure CSRs have adequate training</li> <li>• Use case management approach to help customers</li> <li>• Proactively call customers</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure CSRs have adequate training to provide right info to customers and set right expectations</li> <li>• Proactively call customers</li> </ul>		<ul style="list-style-type: none"> <li>• Lack of ownership, except for those with boots on the ground</li> <li>• Proactive customer service</li> </ul>	<ul style="list-style-type: none"> <li>• Proactive calls to +200K customers as of Feb 2021</li> <li>• Proactive calls to 56K small biz</li> <li>• Increasing CSR staffing</li> <li>• Staggering transition activities to reduce call spikes</li> </ul>



## Appendix B – Low-Income Oversight Board Feedback

Theme	LIOB Feedback	Incorporated into Transition Plan
Extreme Climate Protections	The LIOB recommends that all transition plans include a 7-day or 168 hour-look-ahead period, where if temperatures are forecasted to be above 100 degrees or below 32 degrees, the household shall not be disconnected. The LIOB requests this to be in effect through December 31, 2021.	PG&E appreciates the intent of the LIOB's recommendation; however, PG&E believes that the existing 72-hour look ahead process adopted in D.20-06-003 provides sufficient protection for customers. PG&E clarifies in Section 3.1.1 that it implements the 72-hour look ahead on a rolling basis. With this approach, PG&E is able to suspend disconnections if extreme weather is forecasted seven days out because it is looking ahead three days on a daily basis.
	The LIOB also requests the Commission to pursue all other appropriate procedural avenues to make this best practice a permanent policy thereafter.	See above for more information. PG&E believes that adopting permanent changes to its look ahead process would require the Commission to modify existing requirements in the Disconnections OIR.
	While not within the scope of the Resolution, the LIOB asks the Commission to work with the utilities to develop an "emergency restoration policy," that would temporarily restore service to any household already disconnected when an extreme climate event is predicted in the immediate future.	PG&E appreciates LIOB's recommendation and recommends that to the extent the Commission explores an "emergency restoration policy," such a policy should account for safety concerns associated with re-energization and explored in the appropriate proceeding(s).
Increase CARE Subsidies for the Most Vulnerable to 50%	The LIOB recommends that the Commission instruct utilities to include CARE discounts of up to 50% for households at the highest risk of disconnection as part of their transition plans or other appropriate process. This recommendation is only for households believed to be at high risk of a future disconnection absent of this measure.	While PG&E appreciates the intent of the LIOB's recommendation, PG&E and the Commission are bound by Public Utilities Code (PUC) 739.1, which dictates how the Commission must establish rates for the CARE program. Specifically, PUC 739.1(c)(1) establishes the current average effective CARE rate (30-35%). As a result, LIOB's recommendation may require a tiered CARE rate structure to ensure that the current average effective CARE rate remains in compliance with PUC 739.1(c)(1). PG&E believes this approach would need to be more comprehensively addressed in a relevant rate setting proceeding.
CARE Data Sharing for Water Utilities	The LIOB recommends that the Commission instruct electricity and gas utilities to share their CARE data with Class A and Class B Water Utilities at intervals of no less than a quarterly basis as part of their transition plans.	PG&E agrees with this recommendation, and will share CARE data with Class A and Class B Water Utilities at intervals on a quarterly basis. In addition, PG&E supports LIOB's recommendation to make this a permanent practice.
	The Board further encourages the Commission to pursue all avenues to make this practice a permanent policy to ensure low-income households have access to all programs that may reduce their utility costs. This includes allowing utilities the resources to build the necessary systems for implementation and management.	
Marketing and Outreach	The Board recommends the Commission to direct IOUs transition plans to require separate and distinct marketing, education, and outreach plans for targeting hard-to-reach customers, including those residing on tribal lands and within communities designated as low-income, disadvantaged, and/or underserved. Plans should disclose geographical detail to identify the areas the specific targeted outreach and marketing plans will encompass.	<p>PG&amp;E appreciates the intent behind the LIOB's recommendation and recognizes the need to go above and beyond to ensure our hard-to-reach customers are aware of the expiration of COVID-19 emergency customer protections, and that they understand the financial assistance programs we have to help them. However, PG&amp;E does not believe <i>separate and distinct</i> marketing plans are the most effective use of channels or resources. PG&amp;E recommends maintaining our ME&amp;O approach as described in the Transition Plan.</p> <p>First, PG&amp;E plans to expand upon current efforts to help customers that are past due or struggling to pay bills, as well as customers for whom continuous energy service is essential due to medical or other underlying conditions. PG&amp;E is segmenting this target audience into key audiences</p> <ul style="list-style-type: none"> <li>• General residential support for customers with past due bills</li> <li>• Current participants in our residential income-qualified programs</li> <li>• Customers needing additional financial assistance and program support</li> <li>• Small business customers with past due bills</li> </ul>



		<p>We complement our segmentation approach with a variety of tactics to reach our hard-to-reach customers including, but not limited to:</p> <ul style="list-style-type: none"> <li>• Multi-lingual and multi-channel campaigns to drive awareness of impending changes and to facilitate access to support programs and resources</li> <li>• Offer materials in alternative formats such as braille, large print, and audio</li> <li>• Plans to engage with media, including multi-cultural news orgs and press releases, radio spot ads, etc.</li> <li>• Providing ESA contractors with datasets to target customers when in the field and providing these contractors information about our financial assistance programs (e.g., AMP) to share with our customers</li> <li>• Leveraging CBO networks to target harder-to-reach customers</li> <li>• Using Advisory Groups, Community Associations and Civic Groups to help share information</li> <li>• Partnering with LSPs to co-promote programs</li> </ul> <p>See Section 2 for more information on how we will provide effective ME&amp;O to harder-to-reach customers.</p>
	<p>The Board recommends the Commission extend flexibility for IOUs to increase marketing, education, and outreach budgets by 50% for the transition period, to ensure marketing and outreach plans are adequately scaled and incorporate the needed enhancements to effectively serve hard-to-reach customers and underserved communities. In extending this flexibility, the Commission shall require IOUs to identify financial and contractual resources extended to human services agencies and community-based organizations specifically targeting and serving hard-to-reach customers and underserved communities.</p>	<p>PG&amp;E clarifies that it is not requesting a separate, incremental budget to implement its transition plan.</p> <p>In response to LIOB’s request for the IOUs to identify financial resources to support CBOs that are targeting hard-to-reach and underserved communities, PG&amp;E supports this approach and describes its plans to financially support CBOs in Section 2.5.2. This includes exploring a “pay-for-activity” model that compensates CBOs for each activity conducted, such as CBO newsletter blurbs, social media posts, etc. PG&amp;E also plans to develop a CBO toolkit that provides a turnkey communication for our partners to communicate about the transition and available support programs.</p>
	<p>The Board recommends the Commission direct IOUs to develop reporting mechanisms to track expenditures and outcome results from partnerships with community-based organizations and human services agencies</p>	<p>PG&amp;E supports working with the Commission on appropriate reporting mechanisms to track expenditures and outcome results from partnerships with community-based organizations and human services agencies.</p>
<p>Define and Measure Success</p>	<p>The LIOB recommends the Commission direct utilities to provide no less than quarterly reports to the LIOB that at a minimum provide the following information as part of their transition plans:</p> <ul style="list-style-type: none"> <li>• What number and percentage of disconnections were households enrolled in AMP?</li> <li>• What number and percentage of disconnections were households enrolled in CARE where applicable?</li> <li>• What number and percentage of disconnections were households enrolled in CARE and AMP?</li> <li>• What number and percentage of disconnections were households that received assistance from the LIHEAP program?</li> <li>• What percentage and number of households enrolled in AMP were referred to the following programs:             <ul style="list-style-type: none"> <li>○ ESA</li> <li>○ LIWP</li> <li>○ LIHEAP</li> <li>○ Other Programs</li> </ul> </li> <li>• What were the median and average lengths of disconnections?</li> </ul>	<p>While PG&amp;E appreciates and considered LIOB’s recommendations, PG&amp;E is not incorporating the recommended metrics into its transition plan. PG&amp;E provides additional information below:</p> <ul style="list-style-type: none"> <li>• Proposed metrics such as the number and percentage of disconnections for households enrolled in CARE and the length of disconnections (i.e. number of customers reconnected after certain periods of time) are already included in the publicly-available monthly report that PG&amp;E submits in the Disconnections OIR.</li> <li>• Proposed metrics such as the number and percentage of disconnections for households enrolled in AMP and the number and percentage of disconnections for households enrolled in CARE and AMP are not feasible because customers enrolled in AMP cannot be disconnected.</li> </ul> <p>In addition, PG&amp;E believes that its proposed metrics better align with the intent of Resolution M-4849 which identifies metrics that track:</p> <ul style="list-style-type: none"> <li>• Customers that enrolled in a bill assistance program when emergency customer protections were in place are successful in <i>sustaining their enrollment in the program</i> if they still meet eligibility criteria</li> <li>• <i>New enrollments</i> of impacted customers in payment programs since beginning implementation of the transition plan</li> </ul> <p>Lastly, PG&amp;E clarifies that its proposed metrics will be reported publicly as part of the monthly report in the Disconnections OIR, which is more frequently than the quarterly cadence requested by LIOB.</p>



	<ul style="list-style-type: none"> <li>What were the median and average arrearage amount and time past due from a disconnection?</li> </ul>	
Aliso Canyon Best Practices	<p>The LIOB further recommends the Commission to direct all utilities to include their definition of success in their transition plans so this can be measured with the data presented in answering the above. If possible the Board requests utilities coordinate their definition of success to ensure uniformity in outcome evaluation.</p> <p>The LIOB recommends that the Commission direct the IOUs to enhance Energy Savings Assistance (ESA) with emergency energy cost reductions measures that ensure a minimum of 10% savings to low-income ratepayer bills as part of their transition plans or other appropriate process.</p>	<ul style="list-style-type: none"> <li>PG&amp;E has included a definition of success in our Transition Plan in Section 7.</li> <li>PG&amp;E clarifies that it will include baseline data for the metrics in the monthly reports submitted in the Disconnections OIR, pursuant to Resolution M-4849.</li> </ul> <p>PG&amp;E appreciates the intent of this recommendation and believes that ESA is an important program to help our income-qualified customers lower their monthly energy bills. PG&amp;E is intrigued by LIOB's recommendation to enhance ESA with emergency cost reduction measures that ensures a minimum of 10% savings. Currently, PG&amp;E's mix of measures is limited and does not include measures that would save customers 10% on their bills. PG&amp;E is interested in exploring this recommendation further with the ESA contractors and Energy Division to pinpoint the right measures to deliver these high savings amounts. Following the outcome of discussions, IOUs would be required to file an Advice Letter requesting permission to add new measures to its ESA portfolio, unless the Commission issues a Resolution with specific direction to add new measures.</p> <p>As part of our Transition Plan, we explain that our network of ESA contractors will be a helpful resource in ensuring our income-qualified customers understand the emergency customer protections expiration and the financial programs to help them manage their energy bills. As described in our Transition Plan, we will use our ESA contractors to provide this information to our customers.</p>
Coordination with LIHEAP	<p>The Board recommends the Commission direct IOUs to establish data sharing agreements between Local Service Providers (LSPs), CSD, and IOUs to effectively target LIHEAP assistance to at-risk customers (i.e. customers at-risk of losing services due to nonpayment) as part of their transition plans.</p> <p>The Board recommends the Commission direct IOUs to explore opportunities for and fund joint program enrollment pilots with LSPs to facilitate enrollment of at-risk low-income IOU customers in LIHEAP and IOU CARE Medical Baseline, Percentage of Income Payment Plans (PIPP), and the Arrearage Management Program (AMP) using a single streamlined intake process as part of their transition plans. CSD, working together with selected LSPs, would participate in the development and administration of such pilots.</p>	<p>PG&amp;E supports this recommendation and has data sharing agreements in place with LSPs, as explained in our Transition Plan, Section 2.5.1. In addition, we are exploring how to establish data sharing agreements with HCD to help expedite customers' application process.</p> <p>PG&amp;E is interested in this recommendation and will work with CSD and LSPs to explore the feasibility of such a pilot.</p>
Referral to Weatherization and Other Programs as Part of AMP	<p>The LIOB recommends that the Commission direct IOUs to include a referral to ESA, LIWP, and other weatherization programs in the AMP enrollment process, as part of their transition plans.</p> <p>The LIOB recommends that the Commission direct IOUs to work closely with SOMAH, LIWP, CARE and ESA service providers, CBOs and community stakeholders, to construct enrollment best practices with improved outreach, program eligibility and tailored household energy assessments to better target ratepayer investments that enhance energy savings and reduce energy burden.</p>	<p>PG&amp;E supports this recommendation. As part of our AMP enrollment process, we currently refer customers to other applicable programs like ESA. We plan to continue this best practice.</p> <p>PG&amp;E supports collaborating with other agencies and organizations to share and learn about enrollment best practices, and other initiatives to enhance energy savings and reduce the energy burden for our customers.</p>



## Appendix C – Energy Division and Commissioner Feedback

PG&E has incorporated the following feedback, received via email from Energy Division.

Energy Division and Commissioner Feedback	Incorporated into Transition Plan
<b>Energy Division Email dated March 22, 2021</b>	
<p>For reporting metrics:</p> <ul style="list-style-type: none"> <li>The utilities are encouraged to send proposed reporting metrics to ED for preliminary review (ideally by March 25).</li> <li>Include number of customers that participate in a 12-month payment plan. The disconnection monthly report only requires the IOUs to include number of 3 month+ payment plans and not a 12-month payment plan breakdown.</li> </ul>	<p>PG&amp;E shared draft metrics with the Energy Division on March 25, 2021 and incorporated 12-month payment plans into its proposed metrics.</p>
<p>Leverage the network of local LIHEAP service providers to promote AMP and other low-income programs. Please include this effort and detail how the IOUs will leverage the network of LSPs to promote utility programs in the final transition plans.</p>	<p>PG&amp;E is leveraging LSPs as part of our Transition Plan, described in Section 2.5.1</p>
<p>Be creative and continue working on options that would serve as customer safeguards from feeling like they are getting scammed with all the communications they'll receive. Energy Division encourages the utilities to add anything to mitigate this concern and that can be implemented without detracting from other critical pieces to meet transition plan goals.</p>	<p>PG&amp;E discusses our approach to address these concerns in Section 4.3. In addition, our partnerships with CBOs support authenticity because of their established relationships and ability to serve as trusted communication channels to our customers (see Section 2.5.2 for more information on our CBO partnerships).</p>
<p>For PG&amp;E only - Replace Figure 8 with a higher-resolution figure. The current figure is unclear.</p>	<p>PG&amp;E moved the content from previous Figure 8 into a table with other feedback. For more information, see Appendix A.</p>
Energy Division also requested PG&E to address comments made by Commissioners in the March 11 LIOB meeting:	
<ul style="list-style-type: none"> <li>Simplify communications so that they are easy for customers to understand</li> </ul>	<p>PG&amp;E's ME&amp;O and communication objectives include simple and easily understandable messages. PG&amp;E uses focus groups to test messages for tone, tenor, and simplicity. For more information, see Section 2.2.</p>
<ul style="list-style-type: none"> <li>Align CARE recertification schedule across IOUs</li> </ul>	<p>PG&amp;E's recertification schedule aligns with the IOUs to the extent possible. For more information, see Section 3.2.1.1.</p>
<ul style="list-style-type: none"> <li>Consider word choice - "eligible" in context of "eligible" for disconnection is misleading</li> </ul>	<p>PG&amp;E uses the phrase "at risk of disconnection."</p>
<ul style="list-style-type: none"> <li>Put more consideration/planning into call center volume/staffing to mitigate long wait times</li> </ul>	<p>PG&amp;E acknowledges the potential for high call volume and plans to increase staffing to meet the needs of our customers. For more information, see Section 4.1.</p>
<ul style="list-style-type: none"> <li>Offer multiple languages in customer communications</li> </ul>	<p>PG&amp;E is following the approach we take for PSPS and CWSP outreach, and will make outreach material available in 16 languages. For more information, see Section 2.4.</p>



<ul style="list-style-type: none"> <li>Other IOUs to follow PG&amp;E's approach of data sharing with CSD LIHEAP service providers that supports leveraging LSP LIHEAP funds to customers in greatest need</li> </ul>	N/A
<b>Energy Division Email dated March 30, 2021</b>	
<p>Please promote the rent and utility relief program through your marketing channels (e.g. website, emails, etc.) to raise customer awareness.</p>	<p>PG&amp;E plans to provide customers information about external emergency assistance funding sources such as the COVID-19 Tenant Relief Act (SB 91) and the American Rescue Plan Act through various channels (e.g. website), as applicable to help raise customer awareness</p>
<p>All IOUs should state that they will be promoting the rent and utility relief program and describe the related ME&amp;O activities in their transition plan advice letters.</p>	<p>PG&amp;E will share information on the HCD program on its website similar to how we share information on LIHEAP.</p>
<p>IOUs should also track the payment received from the relief program by including the following metrics in the reporting section in the advice letters.</p> <ul style="list-style-type: none"> <li>Number of payments applied to utility bills</li> <li>Number of payments received to utility bills</li> <li>Total dollar amounts (\$) applied to utility bills</li> <li>Total dollar amounts (\$) received to utility bills</li> </ul>	<p>PG&amp;E considers this request out of scope for the Transition Plan, and better suited for the COVID Debt Relief Rulemaking (R.21-02-014).</p> <p>Further, PG&amp;E believes it is premature to include these metrics in this Transition Plan for the following reasons:</p> <ol style="list-style-type: none"> <li>PG&amp;E does not have insight into the number of customers that apply to participate in this program</li> <li>As this program is new, PG&amp;E lacks clarity on how the program will be administered and operationalized, and whether we will know if specific customer payments were made as part of this program, or on behalf of a customer.</li> <li>PG&amp;E recommends that the Energy Division request that HCD provide the data as the primary source, as the most efficient and accurate way to track and monitor this information.</li> </ol>



## Appendix D – East Bay Community Energy (EBCE) Feedback

PG&E has incorporated or addressed the following feedback, received via email on March 23, 2021 from East Bay Community Energy.

EBCE Feedback	Incorporated into Transition Plan
Include April 30, 2021 date as a milestone in the Estimated Earliest High-Level Timeline of Key Activities	PG&E has not made this change because our pre-transition communications start earlier than April 30, 2021. For more information on our ME&O schedule, see Section 2.3.1.1.
Provide additional details about the sequence and weight of the customer characteristics used to assess customers' potential risk levels for disconnection	PG&E clarifies that the factors listed in Section 3.1.1 are not necessarily prioritized or weighted. Any customer with a past due balance who does not enter into a payment arrangement or disconnection protections consistent with policies adopted in D.20-06-003 may be at risk for disconnection. For more information, see PG&E's Rule 11 tariff.
Include CARE, FERA, MBL in the list of customer characteristics if enrollment reduces the risk of disconnection	PG&E explains the policies that govern residential disconnections in Section 3.1.1. For example, PG&E will not disconnect a medical baseline customer that is current on a 12-month payment plan.
Refer customers served by CCAs to their CCA to learn about CCA offers on the generation side of bill	PG&E recommends continued conversations with the CCAs to discuss ways to co-market program offerings.
Revise language indicating Economic Development Rate (EDR) is a "convenient way to pay" to discount program	PG&E has removed details on its EDR programs that were included in the draft plan shared with LIOB because this offering is not primarily targeted to small businesses.
Recommend that PG&E's CSR team should respond to questions about how federal relief funds and unemployment benefits affect CARE/FERA and other program enrollment	PG&E's CSR team will receive additional training on available programs and requirements as described in Section 4.1.
Include datasets on total arrearage amount (including past-due balances with PG&E) and characteristics that have triggered the disconnection per account to target programs like AMP	<ul style="list-style-type: none"> <li>• PG&amp;E recommends continued conversations with the CCAs to determine whether additional data sharing is required.</li> <li>• PG&amp;E believes that adjustments to arrearage-related data sharing is more appropriately addressed through the Commission's Residential Disconnections OIR (R.18-07-005). For example, the Commission recently provided direction in Resolution E-5114 on data sharing practices to support AMP implementation, which EBCE proposes to modify in this proceeding.</li> </ul>



## **Appendix E – Arrearage Data**

## Appendix E - Residential (Q1)

- 1) The number and percent of unique customers, by ZIP code, who are
- a. more than 90 days in arrears, and
  - b. not enrolled in a Recent Applicable Payment Plan or conventional extended payment plan.

Zip Code	Unique Customer Count	Total Active Customer Count	Percent of Unique Customers
[A]	[B]	[C]	[D] = [B]/[C]
93105	53	348	15.23%
93201	673	5,077	13.26%
93203	408	2,559	15.94%
93204	80	535	14.95%
93210	644	4,632	13.90%
93212	723	4,405	16.41%
93219	24	145	16.55%
93224	39	203	19.21%
93251	114	938	12.15%
93230	209	1,627	12.85%
93234	68	396	17.17%
93239	463	3,559	13.01%
93241	111	982	11.30%
93242	54	460	11.74%
93243	1,442	11,159	12.92%
93245	75	611	12.27%
93249	330	2,617	12.61%
93250	83	529	15.69%
93252	42	312	13.46%
93254	866	6,424	13.48%
93263	45	384	11.72%
93266	911	5,854	15.56%
93268	11	115	9.57%
93276	918	6,513	14.09%
93274	28	363	7.71%
93280	24	174	13.79%
93286	1,314	6,159	21.33%
93291	2,995	16,005	18.71%
93292	2,555	11,364	22.48%
93301	3,602	23,456	15.36%
93302	4,033	23,716	17.01%
93303	3,339	20,155	16.57%
93304	3,285	23,333	14.08%
93305	1,471	17,280	8.51%
93306	1,966	19,707	9.98%
93307	1,969	16,560	11.89%
93308	947	10,071	9.40%
93309	455	12,911	3.52%
93311	262	6,065	4.32%
93312	211	8,161	2.59%
93313	283	12,093	2.34%
93314	700	12,957	5.40%
93401	8	728	1.10%
93402	24	980	2.45%
93405	42	1,978	2.12%
93420			
93422			
93424			
93426			
93427			

93428			
93435	78	3,858	2.02%
93430	53	2,226	2.38%
93432	40	716	5.59%
93433	99	5,527	1.79%
93429			
93434	164	2,291	7.16%
93436	103	4,649	2.22%
93440	11	677	1.62%
93441	14	484	2.89%
93442	143	5,901	2.42%
93444	434	8,028	5.41%
93445	41	2,504	1.64%
93446	787	18,806	4.18%
93448			
93449	61	4,711	1.29%
93450	19	215	8.84%
93451	101	1,682	6.00%
93452	9	235	3.83%
93453	84	1,296	6.48%
93454	490	11,641	4.21%
93455	548	15,522	3.53%
93458	529	12,797	4.13%
93460	76	2,219	3.42%
93461	54	516	10.47%
93463			
94634	72	3,360	2.14%
93465	153	3,895	3.93%
92365			
93516	85	755	11.26%
93523	45	393	11.45%
93527	33	268	12.31%
93555	947	12,636	7.49%
93561	47	1,432	3.28%
93562	129	675	19.11%
93601	69	905	7.62%
93602	105	1,564	6.71%
93603	10	222	4.50%
93604	25	962	2.60%
93606	41	331	12.39%
93608	36	306	11.76%
93609	189	1,528	12.37%
93610	811	5,844	13.88%
93611	1,368	16,911	8.09%
93612	1,927	15,700	12.27%
93614	382	4,890	7.81%
93615			
93670	212	1,472	14.40%
93616	91	652	13.96%
93618	1,320	8,781	15.03%
93619	977	15,204	6.43%
93620	416	3,166	13.14%
93621	24	312	7.69%
93622	226	2,595	8.71%
93623	3	189	1.59%
93624			
93627	22	219	10.05%
93625	265	2,632	10.07%
93626	62	832	7.45%

93628	11	242	4.55%
93630	738	6,027	12.24%
93631	638	5,972	10.68%
93633	9	231	3.90%
93635	1,899	14,396	13.19%
93636	448	4,899	9.14%
93637	1,609	12,459	12.91%
93638			
93639	1,809	13,411	13.49%
93640	312	3,045	10.25%
93641	23	288	7.99%
93643	121	1,665	7.27%
93644	318	4,149	7.66%
93645	16	192	8.33%
93646	391	2,486	15.73%
93647	394	2,829	13.93%
93648	646	3,820	16.91%
93650	238	1,255	18.96%
93651	40	638	6.27%
93652	23	123	18.70%
93653	45	509	8.84%
93654	1,208	9,095	13.28%
93607			
93656	214	1,732	12.36%
93657	1,432	11,823	12.11%
93660	180	1,042	17.27%
93662	1,369	9,151	14.96%
93664	6	265	2.26%
93665	28	221	12.67%
93666	32	174	18.39%
93667	73	943	7.74%
93668	40	333	12.01%
93669	14	195	7.18%
93673	22	188	11.70%
93675	166	1,653	10.04%
93701	872	3,762	23.18%
93702	2,149	12,064	17.81%
93703	1,968	10,382	18.96%
93704	1,548	11,883	13.03%
93705	2,359	12,643	18.66%
93706	2,123	11,009	19.28%
93710	1,521	11,508	13.22%
93711	1,412	16,844	8.38%
93720	1,545	19,473	7.93%
93721			
93793	343	1,702	20.15%
93722	3,786	27,470	13.78%
93723	342	3,512	9.74%
93725	1,011	7,057	14.33%
93726	2,550	15,243	16.73%
93727	3,376	25,656	13.16%
93728	919	5,641	16.29%
93730	316	4,713	6.70%
93737	138	1,744	7.91%
93901	907	10,410	8.71%
93905	1,363	13,518	10.08%
93906	1,492	17,392	8.58%
93907	474	7,363	6.44%
93908	130	4,878	2.67%

93920	4	312	1.28%
93921	37	1,256	2.95%
93923	177	7,007	2.53%
93924	81	2,643	3.06%
93925	34	389	8.74%
93926	227	2,241	10.13%
93927	378	4,569	8.27%
93930	411	4,366	9.41%
93932	20	296	6.76%
93933	582	9,713	5.99%
93940	581	13,918	4.17%
93950	249	7,512	3.31%
93953	51	2,709	1.88%
93954	11	129	8.53%
93955	712	9,355	7.61%
93960	502	4,832	10.39%
93962	12	278	4.32%
94002	270	10,404	2.60%
94005	57	1,885	3.02%
94010	466	16,839	2.77%
94014	702	14,338	4.90%
94015	744	18,543	4.01%
94018	53	1,903	2.79%
94019	145	4,844	2.99%
94020			
94021	18	690	2.61%
94022	159	7,201	2.21%
94024	165	7,679	2.15%
94025	522	15,872	3.29%
94027	58	2,438	2.38%
94028	50	2,300	2.17%
94030	274	8,302	3.30%
94037	20	1,066	1.88%
94038	24	1,030	2.33%
94040	530	14,909	3.55%
94041	212	6,702	3.16%
94043	540	12,616	4.28%
94044	487	14,189	3.43%
94060	2	481	0.42%
94061	641	13,441	4.77%
94062			
94074	263	9,985	2.63%
94063	656	10,452	6.28%
94065	87	5,095	1.71%
94066	551	14,765	3.73%
94070	303	12,285	2.47%
94080	801	21,516	3.72%
94085	352	9,295	3.79%
94086	595	19,801	3.00%
94087	478	20,451	2.34%
94089	181	5,579	3.24%
94102	1,047	12,927	8.10%
94103	990	14,959	6.62%
94104	13	253	5.14%
94105	384	8,638	4.45%
94107	553	16,073	3.44%
94108	314	5,757	5.45%
94109	1,810	28,505	6.35%
94110	1,342	27,229	4.93%

94111	31	955	3.25%
94112	830	20,718	4.01%
94114	574	17,397	3.30%
94115	911	16,687	5.46%
94116	511	14,855	3.44%
94117	920	19,284	4.77%
94118	662	18,049	3.67%
94121	695	18,546	3.75%
94122	846	22,217	3.81%
94123	643	14,878	4.32%
94124	1,357	10,503	12.92%
94127	207	7,306	2.83%
94129	39	636	6.13%
94131	346	12,646	2.74%
94132	693	9,071	7.64%
94133	552	12,240	4.51%
94134	484	10,518	4.60%
94158	219	4,952	4.42%
94303	691	6,951	9.94%
94305	8	970	0.82%
94401	512	12,027	4.26%
94402	221	10,059	2.20%
94403	444	16,614	2.67%
94404	264	15,201	1.74%
94501	1,266	19,729	6.42%
94502	162	4,989	3.25%
94503	399	5,832	6.84%
94505	465	5,446	8.54%
94506	295	8,407	3.51%
94507	202	5,382	3.75%
94508	55	978	5.62%
94509	3,356	22,989	14.60%
94510	629	11,058	5.69%
94511	94	1,046	8.99%
94513	1,716	21,951	7.82%
94514	61	831	7.34%
94515	167	2,652	6.30%
94517	232	4,407	5.26%
94518	735	10,083	7.29%
94519	509	6,824	7.46%
94520	1,560	13,109	11.90%
94521	930	15,972	5.82%
94523	693	14,225	4.87%
94525	124	1,665	7.45%
94569			
94526	412	12,119	3.40%
94528	11	387	2.84%
94530	404	10,800	3.74%
94531	1,602	13,470	11.89%
94533			
94535	2,983	25,082	11.89%
94534	808	13,635	5.93%
94536	1,070	24,840	4.31%
94538	950	22,395	4.24%
94539	446	17,177	2.60%
94541	2,189	22,035	9.93%
94542	387	5,075	7.63%
94544	2,296	23,003	9.98%
94545	680	9,213	7.38%

94546	885	16,689	5.30%
94547	468	8,833	5.30%
94548	27	260	10.38%
94549	342	10,685	3.20%
94550	896	17,991	4.98%
94551	824	14,323	5.75%
94552	129	4,977	2.59%
94553	1,158	18,996	6.10%
94555	336	11,661	2.88%
94556	174	5,991	2.90%
94558	1,541	24,403	6.31%
94559	857	11,043	7.76%
94560	916	15,307	5.98%
94561	1,288	14,070	9.15%
94562	2	131	1.53%
94563	163	6,879	2.37%
94564	432	6,930	6.23%
94565	3,629	29,872	12.15%
94566	701	15,851	4.42%
94567	31	313	9.90%
94568	923	23,886	3.86%
94512	346	5,257	6.58%
94571			
94572	343	3,097	11.08%
94573	6	181	3.31%
94574	193	3,746	5.15%
94576	12	141	8.51%
94577	1,089	16,722	6.51%
94578	1,534	14,545	10.55%
94579	294	6,540	4.50%
94580	561	9,201	6.10%
94582	568	15,051	3.77%
94583	486	14,440	3.37%
94585	1,035	9,806	10.55%
94586	19	381	4.99%
94587	1,165	21,360	5.45%
94588	485	12,091	4.01%
94589	1,090	9,459	11.52%
94590	1,971	14,953	13.18%
94591	1,877	19,927	9.42%
94595	229	10,237	2.24%
94596	506	10,082	5.02%
94597	499	11,100	4.50%
94598	398	10,548	3.77%
94599	55	1,079	5.10%
94601	2,071	15,794	13.11%
94602	791	12,157	6.51%
94603	1,515	10,180	14.88%
94605	2,176	16,504	13.18%
94606	1,551	15,845	9.79%
94607	1,303	11,703	11.13%
94608	1,338	15,214	8.79%
94609	826	10,154	8.13%
94610	824	15,287	5.39%
94516			
94611	741	17,487	4.24%
94604			
94612	763	8,841	8.63%
94618	278	7,445	3.73%

94619	749	9,716	7.71%
94621	1,845	9,785	18.86%
94702	450	7,561	5.95%
94703	551	8,803	6.26%
94704	565	7,593	7.44%
94705	226	5,865	3.85%
94706	220	7,111	3.09%
94707	121	5,086	2.38%
94708	121	4,755	2.54%
94709			
94720	209	5,032	4.15%
94710	273	3,504	7.79%
94801	1,437	10,032	14.32%
94803	707	9,597	7.37%
94804	1,587	15,131	10.49%
94805	352	5,212	6.75%
94806	2,396	20,317	11.79%
94901	1,051	15,509	6.78%
94903	605	11,789	5.13%
94904	173	4,024	4.30%
94920	246	5,732	4.29%
94922	6	133	4.51%
94923	43	1,267	3.39%
94924	37	638	5.80%
94925			
94964	183	4,093	4.47%
94928	985	16,325	6.03%
94929			
94972	20	410	4.88%
94930	225	3,812	5.90%
94931	256	3,634	7.04%
94933	31	373	8.31%
94937	15	825	1.82%
94938			
94950	17	282	6.03%
94939	177	4,548	3.89%
94940	6	137	4.38%
94941	509	12,734	4.00%
94945	353	6,900	5.12%
94946	10	270	3.70%
94947	465	9,451	4.92%
94949	394	6,652	5.92%
94951	88	1,603	5.49%
94952	754	13,305	5.67%
94954	744	14,004	5.31%
94956	31	590	5.25%
94957	32	830	3.86%
94960	249	6,162	4.04%
94963	11	228	4.82%
94965	451	6,010	7.50%
94970	21	721	2.91%
94971	10	170	5.88%
94973	30	592	5.07%
95002	31	427	7.26%
95003	353	10,863	3.25%
95004	76	1,270	5.98%
95005	105	2,286	4.59%
95006	204	3,396	6.01%
95007	16	290	5.52%

95008	907	19,279	4.70%
95010	204	4,795	4.25%
95012	193	2,668	7.23%
95014	448	21,436	2.09%
95017	10	126	7.94%
95018	159	2,902	5.48%
95019	135	1,650	8.18%
95020	1,530	19,550	7.83%
95023	1,273	17,826	7.14%
95030			
95031	176	5,238	3.36%
95032	379	10,362	3.66%
95033	124	3,145	3.94%
95035	809	25,024	3.23%
95037			
95038	893	17,069	5.23%
95039	26	277	9.39%
95041	11	328	3.35%
95043	9	275	3.27%
95044	7	173	4.05%
95045	96	1,592	6.03%
95046	117	1,735	6.74%
95050	640	10,604	6.04%
95051	599	15,376	3.90%
95054	291	6,392	4.55%
95060	767	16,820	4.56%
95062	672	14,119	4.76%
95064	7	367	1.91%
95065	130	3,124	4.16%
95066	176	5,514	3.19%
95070	258	11,019	2.34%
95073	183	3,703	4.94%
95075	13	202	6.44%
95076	1,785	23,062	7.74%
95110	623	7,735	8.05%
95111	1,305	14,075	9.27%
95112	1,671	20,205	8.27%
95113	177	1,715	10.32%
95116	1,380	12,763	10.81%
95117	839	11,487	7.30%
95118	738	11,593	6.37%
95119	133	3,538	3.76%
95120	368	12,716	2.89%
95121	536	9,402	5.70%
95122	1,161	12,562	9.24%
95123	1,430	23,453	6.10%
95124	718	17,285	4.15%
95125	1,077	20,168	5.34%
95126	1,085	16,761	6.47%
95127	1,298	15,823	8.20%
95128	997	14,170	7.04%
95129	385	14,421	2.67%
95130	235	4,993	4.71%
95131	272	9,299	2.93%
95132	434	12,126	3.58%
95133	489	9,004	5.43%
95134	319	12,632	2.53%
95135	210	7,242	2.90%
95136	875	15,328	5.71%

95138	276	5,848	4.72%
95013			
95139	115	2,258	5.09%
95140	5	121	4.13%
95148	657	11,684	5.62%
95202	852	3,254	26.18%
95201			
95203	992	5,747	17.26%
95204	1,486	11,718	12.68%
95205	1,818	10,844	16.77%
95206	2,706	17,900	15.12%
95207	2,910	19,144	15.20%
95209	1,368	13,262	10.32%
95210	1,777	11,968	14.85%
95212	617	7,601	8.12%
95215	882	6,863	12.85%
95219	1,104	11,352	9.73%
95220			
95253	192	2,572	7.47%
95221			
95222	151	2,445	6.18%
95223	212	7,003	3.03%
95224	9	224	4.02%
95225			
95226	73	809	9.02%
95227	49	475	10.32%
95228	180	2,798	6.43%
95229	11	139	7.91%
95230	13	174	7.47%
95231	112	857	13.07%
95232	15	186	8.06%
95233	4	228	1.75%
95236	103	1,583	6.51%
95237	92	1,194	7.71%
95240	1,721	14,967	11.50%
95242	661	10,671	6.19%
95245	50	636	7.86%
95246	60	841	7.13%
95247	86	2,201	3.91%
95248	68	581	11.70%
95249	162	1,552	10.44%
95251	18	312	5.77%
95252	437	4,866	8.98%
95254	42	471	8.92%
95255	84	1,074	7.82%
95257	16	264	6.06%
95258	84	1,395	6.02%
95301	1,392	12,456	11.18%
95304			
95385	450	4,688	9.60%
95306			
95325	55	535	10.28%
95307	1,112	11,892	9.35%
95309	6	122	4.92%
95310	46	739	6.22%
95311	114	1,201	9.49%
95313	20	140	14.29%
95315	264	2,597	10.17%

95303			
95316	97	1,705	5.69%
95317	23	204	11.27%
95318	8	197	4.06%
95319	125	1,008	12.40%
95320	361	4,497	8.03%
95321			
95347	157	3,432	4.57%
95322	389	3,474	11.20%
95323	12	173	6.94%
95324	92	1,781	5.17%
95326	181	2,379	7.61%
95327	240	2,561	9.37%
95328	116	1,220	9.51%
95329	94	1,146	8.20%
95330	726	7,737	9.38%
95333	98	879	11.15%
95334	443	4,567	9.70%
95335	23	603	3.81%
95336	1,642	16,697	9.83%
95337	1,338	13,859	9.65%
95338	488	5,509	8.86%
95340	1,648	13,979	11.79%
95341	1,363	8,697	15.67%
95345	34	344	9.88%
95346	71	1,439	4.93%
95348	1,439	12,445	11.56%
95350	1,802	18,276	9.86%
95351	1,513	10,995	13.76%
95352			
95354	1,028	8,435	12.19%
95355	1,671	20,571	8.12%
95356	800	10,635	7.52%
95357	226	2,672	8.46%
95358	699	6,768	10.33%
95360	416	4,154	10.01%
95361	1,103	12,637	8.73%
95363	727	6,945	10.47%
95364	30	969	3.10%
95365	116	1,294	8.96%
95366	383	6,342	6.04%
95367	688	7,869	8.74%
95368	365	4,050	9.01%
95369	40	391	10.23%
95370	874	12,798	6.83%
95372	38	761	4.99%
95374	75	590	12.71%
95375	16	412	3.88%
95376	1,907	17,959	10.62%
95377	876	9,976	8.78%
95379	144	1,759	8.19%
95380	1,115	12,010	9.28%
95382	553	11,827	4.68%
95383	122	2,934	4.16%
95386	259	2,504	10.34%
95387	22	321	6.85%
95312			
95388	470	4,099	11.47%
95389	12	455	2.64%

95391	365	6,534	5.59%
95401	1,135	13,517	8.40%
95403	1,226	15,910	7.71%
95404	1,051	15,548	6.76%
95405	524	9,372	5.59%
95407	1,359	12,092	11.24%
95409	570	11,671	4.88%
95410	39	516	7.56%
95412	4	131	3.05%
95415	42	593	7.08%
95417	8	105	7.62%
95419	26	319	8.15%
95420	11	160	6.88%
95421	85	991	8.58%
95480			
95422	998	7,670	13.01%
95423	249	2,489	10.00%
95425	305	4,490	6.79%
95426	87	1,231	7.07%
95427	15	173	8.67%
95428			
95429	160	970	16.49%
95432	15	210	7.14%
95435	22	143	15.38%
95436	175	2,636	6.64%
95437	458	6,545	7.00%
95439	19	260	7.31%
95441	46	800	5.75%
95442	99	1,648	6.01%
95443	8	165	4.85%
95444	15	338	4.44%
95445	61	1,332	4.58%
95446	235	3,140	7.48%
95448	399	7,205	5.54%
95449	84	598	14.05%
95450	18	358	5.03%
95451	513	5,505	9.32%
95452	28	707	3.96%
95453	469	5,158	9.09%
95454	121	893	13.55%
95456	23	374	6.15%
95457	140	1,440	9.72%
95458	193	1,662	11.61%
95459	22	370	5.95%
95460	67	1,426	4.70%
95461	99	1,230	8.05%
95430			
95462	70	1,073	6.52%
95463	11	121	9.09%
95464	180	1,375	13.09%
95465	35	672	5.21%
95466	30	463	6.48%
95467	195	2,521	7.74%
95468	66	623	10.59%
95469	72	701	10.27%
95470	239	2,233	10.70%
95471	37	419	8.83%
95472	696	12,167	5.72%
95476	813	15,448	5.26%

95418			
95482	1,041	11,271	9.24%
95485	117	1,016	11.52%
95486	9	143	6.29%
95488	13	143	9.09%
95490	617	5,469	11.28%
95492	489	9,379	5.21%
95493	7	107	6.54%
95494	11	152	7.24%
95497	35	1,780	1.97%
95501	993	10,367	9.58%
95503	748	9,924	7.54%
95511	20	115	17.39%
95518	33	347	9.51%
95519	559	7,104	7.87%
95521	669	8,524	7.85%
95524	42	711	5.91%
95525	68	800	8.50%
95526	53	388	13.66%
95527	60	404	14.85%
95528	51	503	10.14%
95536	79	1,298	6.09%
95537	17	164	10.37%
95540	436	5,629	7.75%
95542			
95545	126	1,004	12.55%
95546	267	1,053	25.36%
95547	47	514	9.14%
95549			
95550	41	357	11.48%
95551	83	669	12.41%
95552			
95595	36	234	15.38%
95553	40	338	11.83%
95514			
95554	56	309	18.12%
95555	23	181	12.71%
95556			
95568	47	317	14.83%
95558	16	208	7.69%
95559			
95560	130	792	16.41%
95562	181	1,473	12.29%
95563	49	351	13.96%
95564	7	127	5.51%
95565	34	346	9.83%
95569	13	135	9.63%
95570	81	1,285	6.30%
95571	19	136	13.97%
95573	112	1,027	10.91%
95585	38	237	16.03%
95587			
95589	36	240	15.00%
95601			
95699	14	243	5.76%
95602	373	7,233	5.16%
95603	694	11,619	5.97%
95605	613	5,079	12.07%
95606	10	140	7.14%

95607	8	161	4.97%
95608	1,491	20,467	7.28%
95610	1,161	13,601	8.54%
95612	29	456	6.36%
95613	7	150	4.67%
95614	85	1,655	5.14%
95616			
95617	651	18,470	3.52%
95618	425	9,694	4.38%
95619	102	1,986	5.14%
95620	659	7,482	8.81%
95621	1,031	12,627	8.17%
95623	143	1,752	8.16%
95624	997	17,210	5.79%
95625	14	112	12.50%
95626	63	1,081	5.83%
95627	154	1,232	12.50%
95628	766	14,892	5.14%
95629	21	454	4.63%
95630	1,107	27,807	3.98%
95631	101	2,429	4.16%
95632	536	7,679	6.98%
95633	98	1,287	7.61%
95634	74	1,380	5.36%
95635	29	468	6.20%
95636	24	630	3.81%
95637			
95679	31	248	12.50%
95640	285	3,492	8.16%
95641	87	878	9.91%
95642			
95654	324	3,442	9.41%
95645	57	471	12.10%
95648	1,121	21,621	5.18%
95650	255	4,897	5.21%
95651	22	361	6.09%
95652	56	234	23.93%
95653	21	160	13.13%
95656	11	253	4.35%
95658	103	2,460	4.19%
95659	26	292	8.90%
95660	1,133	8,858	12.79%
95661	639	11,203	5.70%
95662	533	9,827	5.42%
95663	51	1,119	4.56%
95664	52	600	8.67%
95665	130	2,205	5.90%
95666	145	3,539	4.10%
95667	899	15,400	5.84%
95668	16	315	5.08%
95669	84	1,132	7.42%
95670	1,610	18,822	8.55%
95672	103	1,770	5.82%
95673	425	4,220	10.07%
95674	15	267	5.62%
95675	22	192	11.46%
95676	20	129	15.50%
95677	784	10,654	7.36%
95678	1,255	15,967	7.86%

95681	60	486	12.35%
95682	750	11,742	6.39%
95684	116	1,610	7.20%
95685	161	2,290	7.03%
95686	44	398	11.06%
95687	1,779	23,880	7.45%
95688	1,098	14,332	7.66%
95689	28	743	3.77%
95680			
95690	39	624	6.25%
95691	1,079	13,825	7.80%
95692	195	1,859	10.49%
95694	252	3,437	7.33%
95695	1,443	14,655	9.85%
95697			
95698	30	226	13.27%
95701	9	496	1.81%
95703	40	648	6.17%
95709	82	2,091	3.92%
95713	235	3,871	6.07%
95714	2	237	0.84%
95715	6	160	3.75%
95717	7	112	6.25%
95720	3	396	0.76%
95721	3	258	1.16%
95722	67	1,852	3.62%
95726	171	4,147	4.12%
95724			
95728	38	1,596	2.38%
95735	7	572	1.22%
95736	8	124	6.45%
95742	235	5,275	4.45%
95746	290	7,714	3.76%
95747	1,138	27,279	4.17%
95615			
95757	897	15,288	5.87%
95758	1,449	21,459	6.75%
95762	956	17,422	5.49%
95765	760	15,030	5.06%
95776	672	8,598	7.82%
95811	234	2,435	9.61%
94203			
95814	192	2,075	9.25%
95815	1,359	7,426	18.30%
95816	545	8,069	6.75%
95817	566	5,283	10.71%
95818	762	9,682	7.87%
95819	316	7,519	4.20%
95820	1,392	12,047	11.55%
95821	1,338	12,424	10.77%
95822	1,322	14,472	9.13%
95823	2,420	18,309	13.22%
95824	1,127	7,602	14.83%
95825	1,063	8,137	13.06%
95826	969	11,947	8.11%
95827	436	4,220	10.33%
95828	1,416	14,498	9.77%
95829			
95830	485	8,965	5.41%

95831	771	13,987	5.51%
95832	378	2,890	13.08%
95833	874	10,173	8.59%
95834	1,089	10,994	9.91%
95835			
95837	1,068	14,647	7.29%
95838	1,520	10,467	14.52%
95841	915	6,975	13.12%
95842	1,032	8,647	11.93%
95843	1,127	14,566	7.74%
95864	493	9,307	5.30%
95901	1,846	13,113	14.08%
95912	131	1,594	8.22%
95913	12	148	8.11%
95914	45	441	10.20%
95916	12	125	9.60%
95917	119	1,130	10.53%
95918	84	990	8.48%
95919			
95972	70	658	10.64%
95920	9	113	7.96%
95922	26	294	8.84%
95923	7	187	3.74%
95925	9	134	6.72%
95926			
95927	1,456	16,521	8.81%
95928			
95928	1,358	15,671	8.67%
95930	19	173	10.98%
95932	319	2,994	10.65%
95934	10	130	7.69%
95935	52	457	11.38%
95936	11	244	4.51%
95937	46	560	8.21%
95938			
95958	123	1,584	7.77%
95939	29	213	13.62%
95941	30	265	11.32%
95942	62	1,012	6.13%
95943	21	333	6.31%
95910			
95944	8	110	7.27%
95945	918	11,327	8.10%
95946	276	4,690	5.88%
95947	71	933	7.61%
95948	412	3,906	10.55%
95949	509	8,382	6.07%
95950	17	150	11.33%
95951	67	762	8.79%
95953	413	3,730	11.07%
95954	344	3,517	9.78%
95955	52	521	9.98%
95956	13	270	4.81%
95957	38	291	13.06%
95959	416	8,172	5.09%
95960	39	327	11.93%
95961	1,095	9,101	12.03%
95962	43	636	6.76%
95963	592	6,009	9.85%
95965	938	7,222	12.99%

95966	1,291	12,088	10.68%
95968	73	587	12.44%
95969	253	3,360	7.53%
95970	20	241	8.30%
95971	191	2,368	8.07%
95973	1,176	14,887	7.90%
95974	16	140	11.43%
95975	51	760	6.71%
95977	79	701	11.27%
95978	13	145	8.97%
95979	29	410	7.07%
95915			
95980	13	125	10.40%
95984			
95981	21	351	5.98%
95982	132	1,238	10.66%
95983	14	305	4.59%
95986	8	112	7.14%
95987	223	1,947	11.45%
95988	375	3,668	10.22%
95991	1,789	15,058	11.88%
95993	1,022	12,500	8.18%
96001	784	10,138	7.73%
96002	950	10,827	8.77%
96003	1,117	15,602	7.16%
96007	857	9,518	9.00%
96008	32	373	8.58%
96009			
96068	17	188	9.04%
96011	17	101	16.83%
96013	185	1,882	9.83%
96016	12	236	5.08%
96019			
96089	377	3,095	12.18%
96020	109	1,705	6.39%
96021	714	6,334	11.27%
96022	577	6,534	8.83%
96028	47	769	6.11%
96033	17	198	8.59%
96035			
96078	129	1,252	10.30%
96040	15	180	8.33%
96047	36	345	10.43%
96076			
96051	53	739	7.17%
96055	151	1,577	9.58%
96056	45	711	6.33%
96059	22	303	7.26%
96061	5	146	3.42%
96062	32	476	6.72%
96063	10	285	3.51%
96065	20	216	9.26%
96069	33	365	9.04%
96071	5	201	2.49%
96073	109	1,742	6.26%
96029			
96074	17	174	9.77%
96075	21	192	10.94%
96080	1,285	12,158	10.57%

96084	31	304	10.20%
96087	22	278	7.91%
96088	139	2,528	5.50%
96090	18	191	9.42%
96092	16	175	9.14%
96096	20	352	5.68%
96125	11	475	2.32%
96137	83	2,853	2.91%
<b>Total</b>	<b>422,782</b>	<b>5,505,929</b>	

## Appendix E - Residential (Q2)

2) The number and percent of unique customers, by ZIP code, who are

- a. more than 90 days in arrears,
- b. not enrolled in a Recent Applicable Payment Plan or conventional extended payment plan, and
- c. more than \$250 in total arrears.

Zip Code	Unique Customer Count	Total Active Customer Count	Percent of Unique Customers
[A]	[B]	[C]	[D] = [B]/[C]
93105			
93201	49	348	14.08%
93203	503	5,077	9.91%
93204	359	2,559	14.03%
93206	66	535	12.34%
93210	497	4,632	10.73%
93212	585	4,405	13.28%
93219	18	145	12.41%
93224			
93251	31	203	15.27%
93230	89	938	9.49%
93234	182	1,627	11.19%
93239	57	396	14.39%
93241	318	3,559	8.94%
93242	90	982	9.16%
93243	43	460	9.35%
93245	1,113	11,159	9.97%
93249	49	611	8.02%
93250	238	2,617	9.09%
93252	75	529	14.18%
93254	35	312	11.22%
93263	659	6,424	10.26%
93266	34	384	8.85%
93268			
93276	770	5,854	13.15%
93274	11	115	9.57%
93280	671	6,513	10.30%
93286	24	363	6.61%
93291			
93292	20	174	11.49%
93301	1,163	6,159	18.88%
93304	2,701	15,975	16.91%
93305	2,273	11,364	20.00%
93306	3,192	23,456	13.61%
93301			
93307	3,587	23,744	15.11%
93308	2,810	20,155	13.94%
93309	2,832	23,333	12.14%
93311	1,218	17,280	7.05%
93312	1,443	19,707	7.32%
93313	1,730	16,560	10.45%
93314	617	10,071	6.13%
93401	260	12,911	2.01%
93402	167	6,065	2.75%
93405	127	8,161	1.56%
93420	152	12,093	1.26%
93422	496	12,957	3.83%
93424	3	728	0.41%
93426	16	980	1.63%
93427	24	1,978	1.21%

93428			
93435	49	3,858	1.27%
93430	28	2,226	1.26%
93432	27	716	3.77%
93433	61	5,527	1.10%
93429			
93434	104	2,291	4.54%
93436	60	4,649	1.29%
93440	5	677	0.74%
93441	11	484	2.27%
93442	81	5,901	1.37%
93444	295	8,028	3.67%
93445	20	2,504	0.80%
93446	515	18,806	2.74%
93449	29	4,704	0.62%
93450	15	215	6.98%
93451	68	1,682	4.04%
93452	3	235	1.28%
93453	57	1,296	4.40%
93454	310	11,641	2.66%
93455	382	15,522	2.46%
93458	325	12,797	2.54%
93460	48	2,219	2.16%
93461	43	516	8.33%
93463			
93464	40	3,360	1.19%
93465	71	3,895	1.82%
92365			
93516	65	755	8.61%
93523	31	393	7.89%
93527	23	268	8.58%
93555	619	12,636	4.90%
93561	36	1,432	2.51%
93562	80	675	11.85%
93601	49	905	5.41%
93602	78	1,564	4.99%
93603	6	222	2.70%
93604	21	962	2.18%
93606	35	331	10.57%
93608	28	306	9.15%
93609	150	1,528	9.82%
93610	732	5,844	12.53%
93611	1,215	16,911	7.18%
93612	1,705	15,700	10.86%
93614	293	4,890	5.99%
93615			
93670	171	1,472	11.62%
93616	72	652	11.04%
93618	1,034	8,781	11.78%
93619	733	15,204	4.82%
93620	377	3,166	11.91%
93621	20	312	6.41%
93622	197	2,595	7.59%
93623	2	189	1.06%
93624	18	202	8.91%
93625	234	2,632	8.89%
93626	46	832	5.53%
93628	5	242	2.07%

93630	629	6,027	10.44%
93631	506	5,972	8.47%
93633	4	231	1.73%
93635	1,659	14,396	11.52%
93636	331	4,899	6.76%
93637	1,415	12,459	11.36%
93638			
93639	1,558	13,411	11.62%
93640	271	3,045	8.90%
93641	17	288	5.90%
93643	97	1,665	5.83%
93644	264	4,149	6.36%
93645	14	192	7.29%
93646	310	2,486	12.47%
93647	308	2,829	10.89%
93648	495	3,820	12.96%
93650	207	1,255	16.49%
93651	27	638	4.23%
93652	23	123	18.70%
93653	33	509	6.48%
93654	920	9,095	10.12%
93607			
93627			
93656	176	1,749	10.06%
93657	1,243	11,823	10.51%
93660	164	1,042	15.74%
93662	1,183	9,151	12.93%
93664	4	265	1.51%
93665	24	221	10.86%
93666	26	174	14.94%
93667	56	943	5.94%
93668	36	333	10.81%
93669	12	195	6.15%
93673	17	188	9.04%
93675	136	1,653	8.23%
93701	785	3,762	20.87%
93702	1,953	12,064	16.19%
93703	1,795	10,382	17.29%
93704	1,414	11,883	11.90%
93705	2,161	12,643	17.09%
93706	1,879	11,009	17.07%
93710	1,359	11,508	11.81%
93711	1,211	16,844	7.19%
93720	1,377	19,473	7.07%
93721			
93793	298	1,702	17.51%
93722	3,470	27,470	12.63%
93723	293	3,512	8.34%
93725	910	7,057	12.89%
93726	2,266	15,243	14.87%
93727	2,962	25,656	11.55%
93728	833	5,641	14.77%
93730	258	4,713	5.47%
93737	108	1,744	6.19%
93901	559	10,410	5.37%
93905	658	13,518	4.87%
93906	887	17,392	5.10%
93907	318	7,363	4.32%

93908	92	4,878	1.89%
93920	1	312	0.32%
93921	25	1,256	1.99%
93923	130	7,007	1.86%
93924	57	2,643	2.16%
93925	24	389	6.17%
93926	147	2,241	6.56%
93927	217	4,569	4.75%
93930	254	4,366	5.82%
93932	13	296	4.39%
93933	322	9,713	3.32%
93940	346	13,918	2.49%
93950	140	7,512	1.86%
93953	37	2,709	1.37%
93954	9	129	6.98%
93955	416	9,355	4.45%
93960	301	4,832	6.23%
93962	8	278	2.88%
94002	155	10,404	1.49%
94005	24	1,885	1.27%
94010	273	16,839	1.62%
94014	413	14,338	2.88%
94015	398	18,543	2.15%
94018	41	1,903	2.15%
94019	89	4,844	1.84%
94020			
94021	12	690	1.74%
94022	144	7,201	2.00%
94024	150	7,679	1.95%
94025	359	15,872	2.26%
94027	54	2,438	2.21%
94028	45	2,300	1.96%
94030	159	8,302	1.92%
94037	17	1,066	1.59%
94038	19	1,030	1.84%
94040	367	14,909	2.46%
94041	151	6,702	2.25%
94043	273	12,616	2.16%
94044	306	14,189	2.16%
94060	1	481	0.21%
94061	372	13,441	2.77%
94062			
94074	195	9,985	1.95%
94063	361	10,452	3.45%
94065	59	5,095	1.16%
94066	310	14,765	2.10%
94070	198	12,285	1.61%
94080	507	21,516	2.36%
94085	247	9,295	2.66%
94086	443	19,801	2.24%
94087	365	20,451	1.78%
94089	143	5,579	2.56%
94102	311	12,927	2.41%
94103	363	14,959	2.43%
94104	4	253	1.58%
94105	217	8,638	2.51%
94107	312	16,073	1.94%
94108	83	5,757	1.44%

94109	560	28,505	1.96%
94110	761	27,229	2.79%
94111	11	955	1.15%
94112	640	20,718	3.09%
94114	340	17,397	1.95%
94115	453	16,687	2.71%
94116	393	14,855	2.65%
94117	533	19,284	2.76%
94118	382	18,049	2.12%
94121	434	18,546	2.34%
94122	613	22,217	2.76%
94123	292	14,878	1.96%
94124	1,002	10,503	9.54%
94127	170	7,306	2.33%
94129	30	636	4.72%
94131	247	12,646	1.95%
94132	317	9,071	3.49%
94133	261	12,240	2.13%
94134	383	10,518	3.64%
94158	95	4,952	1.92%
94303	434	6,951	6.24%
94305	6	970	0.62%
94401	256	12,027	2.13%
94402	148	10,059	1.47%
94403	277	16,614	1.67%
94404	177	15,201	1.16%
94501	695	19,729	3.52%
94502	121	4,989	2.43%
94503	361	5,832	6.19%
94505	440	5,446	8.08%
94506	277	8,407	3.29%
94507	192	5,382	3.57%
94508	50	978	5.11%
94509	2,999	22,989	13.05%
94510	541	11,058	4.89%
94511	85	1,046	8.13%
94513	1,523	21,951	6.94%
94514	57	831	6.86%
94515	134	2,652	5.05%
94517	209	4,407	4.74%
94518	662	10,083	6.57%
94519	461	6,824	6.76%
94520	1,262	13,109	9.63%
94521	831	15,972	5.20%
94523	589	14,225	4.14%
94525			
94569	117	1,665	7.03%
94526	379	12,119	3.13%
94528	8	387	2.07%
94530	346	10,800	3.20%
94531	1,492	13,470	11.08%
94533			
94535	2,628	25,082	10.48%
94534	747	13,635	5.48%
94536	894	24,840	3.60%
94538	780	22,395	3.48%
94539	388	17,177	2.26%
94541	1,893	22,035	8.59%

94542	338	5,075	6.66%
94544	1,948	23,003	8.47%
94545	611	9,213	6.63%
94546	771	16,689	4.62%
94547	420	8,833	4.75%
94548	25	260	9.62%
94549	293	10,685	2.74%
94550	779	17,991	4.33%
94551	725	14,323	5.06%
94552	119	4,977	2.39%
94553	1,031	18,996	5.43%
94555	309	11,661	2.65%
94556	149	5,991	2.49%
94558	1,353	24,403	5.54%
94559	757	11,043	6.86%
94560	741	15,307	4.84%
94561	1,191	14,070	8.46%
94562	1	131	0.76%
94563	143	6,879	2.08%
94564	399	6,930	5.76%
94565	3,314	29,872	11.09%
94566	571	15,851	3.60%
94567	27	313	8.63%
94568	796	23,886	3.33%
94512			
94571	256	5,257	4.87%
94572	305	3,097	9.85%
94573	6	181	3.31%
94574	162	3,746	4.32%
94576	10	141	7.09%
94577	876	16,722	5.24%
94578	1,166	14,545	8.02%
94579	252	6,540	3.85%
94580	499	9,201	5.42%
94582	515	15,051	3.42%
94583	442	14,440	3.06%
94585	936	9,806	9.55%
94586	19	381	4.99%
94587	1,019	21,360	4.77%
94588	419	12,091	3.47%
94589	1,015	9,459	10.73%
94590	1,718	14,953	11.49%
94591	1,731	19,927	8.69%
94595	182	10,237	1.78%
94596	404	10,082	4.01%
94597	434	11,100	3.91%
94598	357	10,548	3.38%
94599	46	1,079	4.26%
94601	1,623	15,794	10.28%
94602	624	12,157	5.13%
94603	1,343	10,180	13.19%
94605	1,888	16,504	11.44%
94606	1,127	15,845	7.11%
94607	979	11,703	8.37%
94608	1,050	15,214	6.90%
94609	599	10,154	5.90%
94610	558	15,287	3.65%

94516			
94611	564	17,487	3.23%
94604			
94612	482	8,841	5.45%
94618	224	7,445	3.01%
94619	638	9,716	6.57%
94621	1,590	9,785	16.25%
94702	317	7,561	4.19%
94703	417	8,803	4.74%
94704	240	7,593	3.16%
94705	151	5,865	2.57%
94706	172	7,111	2.42%
94707	101	5,086	1.99%
94708	107	4,755	2.25%
94709			
94720	109	5,032	2.17%
94710	192	3,504	5.48%
94801	1,237	10,032	12.33%
94803	645	9,597	6.72%
94804	1,416	15,131	9.36%
94805	323	5,212	6.20%
94806	2,058	20,317	10.13%
94901	827	15,509	5.33%
94903	528	11,789	4.48%
94904	160	4,024	3.98%
94920	221	5,732	3.86%
94922	6	133	4.51%
94923	34	1,267	2.68%
94924	34	638	5.33%
94925			
94964	155	4,093	3.79%
94928	858	16,325	5.26%
94929			
94972	16	410	3.90%
94930	190	3,812	4.98%
94931	228	3,634	6.27%
94933	23	373	6.17%
94937	10	825	1.21%
94938			
94950	14	282	4.96%
94939	151	4,548	3.32%
94940	4	137	2.92%
94941	444	12,734	3.49%
94945	303	6,900	4.39%
94946	7	270	2.59%
94947	409	9,451	4.33%
94949	332	6,652	4.99%
94951	76	1,603	4.74%
94952	646	13,305	4.86%
94954	663	14,004	4.73%
94956	25	590	4.24%
94957	29	830	3.49%
94960	217	6,162	3.52%
94963	7	228	3.07%
94965	364	6,010	6.06%
94970	17	721	2.36%
94971	7	170	4.12%
94973	25	592	4.22%

95002	27	427	6.32%
95003	257	10,863	2.37%
95004	62	1,270	4.88%
95005	89	2,286	3.89%
95006	178	3,396	5.24%
95007	16	290	5.52%
95008	693	19,279	3.59%
95010	112	4,795	2.34%
95012	113	2,668	4.24%
95014	378	21,436	1.76%
95017	10	126	7.94%
95018	141	2,902	4.86%
95019	110	1,650	6.67%
95020	1,368	19,550	7.00%
95023	857	17,826	4.81%
95030			
95031	152	5,238	2.90%
95032	318	10,362	3.07%
95033	94	3,145	2.99%
95035	662	25,024	2.65%
95037			
95038	759	17,069	4.45%
95039	21	277	7.58%
95041	11	328	3.35%
95043	8	275	2.91%
95044	4	173	2.31%
95045	66	1,592	4.15%
95046	107	1,735	6.17%
95050	305	10,604	2.88%
95051	348	15,376	2.26%
95054	157	6,392	2.46%
95060	561	16,820	3.34%
95062	515	14,119	3.65%
95064	5	367	1.36%
95065	103	3,124	3.30%
95066	153	5,514	2.77%
95070	235	11,019	2.13%
95073	124	3,703	3.35%
95075	8	202	3.96%
95076	1,476	23,062	6.40%
95110	429	7,735	5.55%
95111	1,076	14,075	7.64%
95112	1,252	20,205	6.20%
95113	88	1,715	5.13%
95116	1,189	12,763	9.32%
95117	623	11,487	5.42%
95118	615	11,593	5.30%
95119	116	3,538	3.28%
95120	348	12,716	2.74%
95121	477	9,402	5.07%
95122	969	12,562	7.71%
95123	1,275	23,453	5.44%
95124	634	17,285	3.67%
95125	896	20,168	4.44%
95126	802	16,761	4.78%
95127	1,150	15,823	7.27%
95128	780	14,170	5.50%
95129	313	14,421	2.17%

95130	208	4,993	4.17%
95131	246	9,299	2.65%
95132	377	12,126	3.11%
95133	421	9,004	4.68%
95134	276	12,632	2.18%
95135	181	7,242	2.50%
95136	764	15,328	4.98%
95138	253	5,848	4.33%
95013			
95139	106	2,258	4.69%
95140	4	121	3.31%
95148	624	11,684	5.34%
95202	663	3,254	20.37%
95201			
95203	873	5,747	15.19%
95204	1,343	11,718	11.46%
95205	1,658	10,844	15.29%
95206	2,526	17,900	14.11%
95207	2,572	19,144	13.44%
95209	1,297	13,262	9.78%
95210	1,630	11,968	13.62%
95212	573	7,601	7.54%
95215	785	6,863	11.44%
95219	992	11,352	8.74%
95220			
95253	158	2,572	6.14%
95221			
95222	113	2,445	4.62%
95223	151	7,003	2.16%
95224	8	224	3.57%
95225			
95226	60	809	7.42%
95227	29	475	6.11%
95228	146	2,798	5.22%
95229	9	139	6.47%
95230	9	174	5.17%
95231	97	857	11.32%
95232	13	186	6.99%
95233	3	228	1.32%
95236	88	1,583	5.56%
95237	80	1,194	6.70%
95240	1,113	14,967	7.44%
95242	506	10,671	4.74%
95245	36	636	5.66%
95246	44	841	5.23%
95247	74	2,201	3.36%
95248	55	581	9.47%
95249	139	1,552	8.96%
95251	11	312	3.53%
95252	335	4,866	6.88%
95254	26	471	5.52%
95255	65	1,074	6.05%
95257	10	264	3.79%
95258	78	1,395	5.59%
95301	1,241	12,456	9.96%
95304			
95385	397	4,688	8.47%

95306			
95325	45	535	8.41%
95307	759	11,892	6.38%
95309	5	122	4.10%
95310	35	739	4.74%
95311	84	1,201	6.99%
95313	17	140	12.14%
95315	185	2,597	7.12%
95303			
95316	71	1,705	4.16%
95317	13	204	6.37%
95318	5	197	2.54%
95319	92	1,008	9.13%
95320	312	4,497	6.94%
95321			
95347	125	3,432	3.64%
95322	330	3,474	9.50%
95323	8	173	4.62%
95324	63	1,781	3.54%
95326	144	2,379	6.05%
95327	199	2,561	7.77%
95328	73	1,220	5.98%
95329	75	1,146	6.54%
95330	643	7,737	8.31%
95333	78	879	8.87%
95334	387	4,567	8.47%
95335	12	603	1.99%
95336	1,453	16,697	8.70%
95337	1,186	13,859	8.56%
95338	392	5,509	7.12%
95340	1,434	13,979	10.26%
95341	1,184	8,697	13.61%
95345	32	344	9.30%
95346	54	1,439	3.75%
95348	1,219	12,445	9.80%
95350	1,206	18,276	6.60%
95351	1,074	10,995	9.77%
95352			
95354	712	8,435	8.44%
95355	1,160	20,571	5.64%
95356	561	10,635	5.28%
95357	185	2,672	6.92%
95358	513	6,768	7.58%
95360	362	4,154	8.71%
95361	942	12,637	7.45%
95363	543	6,945	7.82%
95364	18	969	1.86%
95365	101	1,294	7.81%
95366	334	6,342	5.27%
95367	620	7,869	7.88%
95368	262	4,050	6.47%
95369	35	391	8.95%
95370	702	12,798	5.49%
95372	28	761	3.68%
95374	64	590	10.85%
95375	9	412	2.18%
95376	1,739	17,959	9.68%
95377	814	9,976	8.16%

95379	117	1,759	6.65%
95380	701	12,010	5.84%
95382	383	11,827	3.24%
95383	105	2,934	3.58%
95386	177	2,504	7.07%
95387	18	321	5.61%
95312			
95388	405	4,099	9.88%
95389	6	455	1.32%
95391	307	6,534	4.70%
95401	1,004	13,517	7.43%
95403	1,042	15,910	6.55%
95404	901	15,548	5.79%
95405	469	9,372	5.00%
95407	1,192	12,092	9.86%
95409	507	11,671	4.34%
95410	26	516	5.04%
95412	3	131	2.29%
95415	28	593	4.72%
95417	7	105	6.67%
95419	21	319	6.58%
95420	5	160	3.13%
95421			
95480	66	991	6.66%
95422	896	7,670	11.68%
95423	220	2,489	8.84%
95425	264	4,490	5.88%
95426	72	1,231	5.85%
95427	10	173	5.78%
95428			
95429	137	970	14.12%
95432	13	210	6.19%
95435	15	143	10.49%
95436	148	2,636	5.61%
95437	348	6,545	5.32%
95439	18	260	6.92%
95441	38	800	4.75%
95442	87	1,648	5.28%
95443	7	165	4.24%
95444	13	338	3.85%
95445	42	1,332	3.15%
95446	190	3,140	6.05%
95448	254	7,205	3.53%
95449	69	598	11.54%
95450	12	358	3.35%
95451	421	5,505	7.65%
95452	24	707	3.39%
95453	397	5,158	7.70%
95454	94	893	10.53%
95456	18	374	4.81%
95457	117	1,440	8.13%
95458	164	1,662	9.87%
95459	16	370	4.32%
95460	51	1,426	3.58%
95461	79	1,230	6.42%
95430			
95462	52	1,073	4.85%
95463	5	121	4.13%

95464	162	1,375	11.78%
95465	30	672	4.46%
95466	23	463	4.97%
95467	160	2,521	6.35%
95468	51	623	8.19%
95469	59	701	8.42%
95470	215	2,233	9.63%
95471	32	419	7.64%
95472	585	12,167	4.81%
95476	719	15,448	4.65%
95418			
95482	760	11,271	6.74%
95485	97	1,016	9.55%
95486	6	143	4.20%
95488	11	143	7.69%
95490	551	5,469	10.07%
95492	449	9,379	4.79%
95493	5	107	4.67%
95494	6	152	3.95%
95497	27	1,780	1.52%
95501	837	10,367	8.07%
95503	674	9,924	6.79%
95511	17	115	14.78%
95518	27	347	7.78%
95519	490	7,104	6.90%
95521	558	8,524	6.55%
95524	40	711	5.63%
95525	57	800	7.13%
95526	30	388	7.73%
95527	35	404	8.66%
95528	47	503	9.34%
95536	65	1,298	5.01%
95537	14	164	8.54%
95540	389	5,629	6.91%
95542			
95545	110	1,004	10.96%
95546	220	1,053	20.89%
95547	40	514	7.78%
95549			
95550	36	357	10.08%
95551	69	669	10.31%
95552			
95595	28	234	11.97%
95553	35	338	10.36%
95514			
95554	47	309	15.21%
95555	21	181	11.60%
95556			
95568	30	317	9.46%
95558	11	208	5.29%
95559			
95560	113	792	14.27%
95562	159	1,473	10.79%
95563	28	351	7.98%
95564	6	127	4.72%
95565	33	346	9.54%
95569	11	135	8.15%
95570	66	1,285	5.14%

95571	16	136	11.76%
95573	95	1,027	9.25%
95585	25	237	10.55%
95587			
95589	34	240	14.17%
95601			
95699	11	243	4.53%
95602	312	7,233	4.31%
95603	576	11,619	4.96%
95605	512	5,079	10.08%
95606	8	140	5.71%
95607	8	161	4.97%
95608	836	20,467	4.08%
95610	648	13,601	4.76%
95612	20	456	4.39%
95613	4	150	2.67%
95614	63	1,655	3.81%
95616	479	18,468	2.59%
95618	358	9,694	3.69%
95619	85	1,986	4.28%
95620	547	7,482	7.31%
95621	547	12,627	4.33%
95623	105	1,752	5.99%
95624	736	17,210	4.28%
95625	12	112	10.71%
95626	40	1,081	3.70%
95627	139	1,232	11.28%
95628	504	14,892	3.38%
95629	17	454	3.74%
95630	628	27,807	2.26%
95631	87	2,429	3.58%
95632	384	7,679	5.00%
95633	78	1,287	6.06%
95634	60	1,380	4.35%
95635	23	468	4.91%
95636	19	630	3.02%
95637			
95679	22	248	8.87%
95640	236	3,492	6.76%
95641	72	878	8.20%
95642			
95654	276	3,442	8.02%
95645	46	471	9.77%
95648	996	21,621	4.61%
95650	219	4,897	4.47%
95651	14	361	3.88%
95652	42	234	17.95%
95653	16	160	10.00%
95656	6	253	2.37%
95658	84	2,460	3.41%
95659	20	292	6.85%
95660	741	8,858	8.37%
95661	384	11,203	3.43%
95662	365	9,827	3.71%
95663	45	1,119	4.02%
95664	36	600	6.00%
95665	104	2,205	4.72%
95666	123	3,539	3.48%

95667	718	15,400	4.66%
95668	13	315	4.13%
95669	62	1,132	5.48%
95670	906	18,822	4.81%
95672	67	1,770	3.79%
95673	319	4,220	7.56%
95674	12	267	4.49%
95675	17	192	8.85%
95676	18	129	13.95%
95677	674	10,654	6.33%
95678	764	15,967	4.78%
95681	53	486	10.91%
95682	577	11,742	4.91%
95684	97	1,610	6.02%
95685	135	2,290	5.90%
95686	40	398	10.05%
95687	1,543	23,880	6.46%
95688	961	14,332	6.71%
95689	25	743	3.36%
95680			
95690	33	624	5.29%
95691	881	13,825	6.37%
95692	163	1,859	8.77%
95694	216	3,437	6.28%
95695	1,222	14,655	8.34%
95697			
95698	28	226	12.39%
95701	7	496	1.41%
95703	35	648	5.40%
95709	63	2,091	3.01%
95713	203	3,871	5.24%
95714	2	237	0.84%
95715	3	160	1.88%
95717	4	112	3.57%
95720	2	396	0.51%
95721	2	258	0.78%
95722	56	1,852	3.02%
95726	145	4,147	3.50%
95728	32	1,541	2.08%
95735	3	572	0.52%
95736	6	124	4.84%
95742	180	5,275	3.41%
95746	268	7,714	3.47%
95747	743	27,279	2.72%
95615			
95757	686	15,288	4.49%
95758	1,067	21,459	4.97%
95762	776	17,422	4.45%
95765	683	15,030	4.54%
95776	586	8,598	6.82%
95811	84	2,435	3.45%
95814	58	2,059	2.82%
95815	830	7,426	11.18%
95816	237	8,069	2.94%
95817	350	5,283	6.63%
95818	415	9,682	4.29%
95819	242	7,519	3.22%
95820	1,046	12,047	8.68%

95821	638	12,424	5.14%
95822	924	14,472	6.38%
95823	1,595	18,309	8.71%
95824	697	7,602	9.17%
95825	446	8,137	5.48%
95826	611	11,947	5.11%
95827	291	4,220	6.90%
95828	1,002	14,498	6.91%
95829			
95830	385	8,965	4.29%
95831	447	13,987	3.20%
95832	294	2,890	10.17%
95833	584	10,173	5.74%
95834	671	10,994	6.10%
95835			
95837	788	14,647	5.38%
95838	1,027	10,467	9.81%
95841	491	6,975	7.04%
95842	593	8,647	6.86%
95843	811	14,566	5.57%
95864	334	9,307	3.59%
95901	1,573	13,113	12.00%
95912	104	1,594	6.52%
95913	7	148	4.73%
95914	38	441	8.62%
95916	6	125	4.80%
95917	85	1,130	7.52%
95918	61	990	6.16%
95919			
95972	57	658	8.66%
95920	8	113	7.08%
95922	18	294	6.12%
95923	4	187	2.14%
95925	7	134	5.22%
95926			
95927	1,205	16,521	7.29%
95928	1,094	15,671	6.98%
95930	14	173	8.09%
95932	273	2,994	9.12%
95934	10	130	7.69%
95935	47	457	10.28%
95936	9	244	3.69%
95937	39	560	6.96%
95938			
95958	95	1,538	6.18%
95939	24	213	11.27%
95941	22	265	8.30%
95942	49	1,012	4.84%
95943	17	333	5.11%
95910			
95944	7	110	6.36%
95945	720	11,327	6.36%
95946	222	4,690	4.73%
95947	55	933	5.89%
95948	299	3,906	7.65%
95949	406	8,382	4.84%
95950	15	150	10.00%
95951	59	762	7.74%

95953	355	3,730	9.52%
95954	309	3,517	8.79%
95955	47	521	9.02%
95956	11	270	4.07%
95957	34	291	11.68%
95959	344	8,172	4.21%
95960	35	327	10.70%
95961	971	9,101	10.67%
95962	33	636	5.19%
95963	468	6,009	7.79%
95965	788	7,222	10.91%
95966	1,103	12,088	9.12%
95968	67	587	11.41%
95969	156	3,360	4.64%
95970	19	241	7.88%
95971	162	2,368	6.84%
95973	938	14,887	6.30%
95958			
95974	19	186	10.22%
95975	41	760	5.39%
95977	65	701	9.27%
95978	10	145	6.90%
95979	27	410	6.59%
95981	11	351	3.13%
95982	116	1,238	9.37%
95983	11	305	3.61%
95915			
95980			
95984	12	125	9.60%
95986	7	112	6.25%
95987	175	1,947	8.99%
95988	304	3,668	8.29%
95991	1,558	15,058	10.35%
95993	869	12,500	6.95%
96001	495	10,138	4.88%
96002	651	10,827	6.01%
96003	789	15,602	5.06%
96007	734	9,518	7.71%
96008	27	373	7.24%
96009			
96068	17	188	9.04%
96011	14	101	13.86%
96013	166	1,882	8.82%
96016	8	236	3.39%
96019			
96089	265	3,095	8.56%
96020	92	1,705	5.40%
96021			
96029			
96074	613	6,508	9.42%
96022	492	6,534	7.53%
96028	36	769	4.68%
96033	17	198	8.59%
96035			
96078	110	1,252	8.79%
96040	13	180	7.22%
96047			
96076	27	345	7.83%

96051	40	739	5.41%
96055	122	1,577	7.74%
96056	36	711	5.06%
96059	21	303	6.93%
96062	23	476	4.83%
96063	7	285	2.46%
96065	17	216	7.87%
96069	24	365	6.58%
96071	3	201	1.49%
96073	83	1,742	4.76%
96075	15	192	7.81%
96080	1,086	12,158	8.93%
96084	26	304	8.55%
96087	17	278	6.12%
96088	118	2,528	4.67%
96090	16	191	8.38%
96092	14	175	8.00%
96096	14	352	3.98%
96125	6	475	1.26%
96137	58	2,853	2.03%
<b>Total</b>	<b>335,024</b>	<b>5,505,701</b>	

## Appendix E - Small Business (Q1)

- 1) The number and percent of unique customers, by ZIP code, who are
- a. more than 90 days in arrears, and
  - b. not enrolled in a Recent Applicable Payment Plan or conventional extended payment plan.

Zip Code	Unique Customer Count	Total Active Customer Count	Percent of Unique Customers
[A]	[B]	[C]	[D] = [B]/[C]
93101			
93105	2	28	7.14%
93201	4	74	5.41%
93203	16	369	4.34%
93204	8	186	4.30%
93206	7	173	4.05%
93210	29	417	6.95%
93212	31	380	8.16%
93224	1	28	3.57%
93230	16	400	4.00%
93234	9	193	4.66%
93239	8	87	9.20%
93241	17	218	7.80%
93242	13	253	5.14%
93243	1	82	1.22%
93245	51	1,004	5.08%
93249	5	159	3.14%
93250	28	238	11.76%
93251	3	70	4.29%
93252	1	89	1.12%
93254	8	92	8.70%
93263	29	624	4.65%
93266	9	79	11.39%
93268			
93276	33	483	6.83%
93280	39	641	6.08%
93286	13	224	5.80%
93301	142	1,781	7.97%
93304	86	970	8.87%
93305	101	839	12.04%
93306	42	715	5.87%
93307	149	1,652	9.02%
93308	146	2,050	7.12%
93309	70	1,233	5.68%
93311	13	513	2.53%
93312	46	797	5.77%
93313	74	1,125	6.58%
93314	23	382	6.02%
93401	106	2,776	3.82%
93402			
93403	29	369	7.86%

93405	16	407	3.93%
93408			
93410	9	18	50.00%
93420	41	1,292	3.17%
93422	59	1,207	4.89%
93424	3	114	2.63%
93426	6	140	4.29%
93427	26	480	5.42%
93428	18	406	4.43%
93430	4	214	1.87%
93432	13	175	7.43%
93433	31	589	5.26%
93434	4	145	2.76%
93436			
93437	19	409	4.65%
93440	9	118	7.63%
93441	4	172	2.33%
93442	23	636	3.62%
93444	25	569	4.39%
93445	10	163	6.13%
93446	95	2,512	3.78%
93449	12	425	2.82%
93450	1	95	1.05%
93451	7	297	2.36%
93452	1	42	2.38%
93453	7	243	2.88%
93454	78	1,503	5.19%
93455	52	1,224	4.25%
93458	47	748	6.28%
93460	14	596	2.35%
93461	4	143	2.80%
93463	25	610	4.10%
93465	22	607	3.62%
92365			
93516			
93523	5	78	6.41%
93555	25	540	4.63%
93602	7	140	5.00%
93603	3	40	7.50%
93604	2	64	3.13%
93606	2	21	9.52%
93608	3	71	4.23%
93609	18	260	6.92%
93610	61	782	7.80%
93611	31	1,112	2.79%
93612	124	1,581	7.84%
93614	13	205	6.34%
93615	12	183	6.56%
93616	15	118	12.71%

93618	80	1,060	7.55%
93619	23	365	6.30%
93620	24	443	5.42%
93621	1	35	2.86%
93622	26	526	4.94%
93624	5	88	5.68%
93625	21	464	4.53%
93626	1	81	1.23%
93630	60	886	6.77%
93631	37	890	4.16%
93633	3	23	13.04%
93635	81	1,180	6.86%
93636	19	209	9.09%
93637	91	1,490	6.11%
93638			
93639	68	1,064	6.39%
93640	18	314	5.73%
93641	3	28	10.71%
93643	9	149	6.04%
93644	38	626	6.07%
93645	1	40	2.50%
93646	18	461	3.90%
93647	43	473	9.09%
93648	27	301	8.97%
93650	10	162	6.17%
93652	3	27	11.11%
93653	3	36	8.33%
93654	79	1,356	5.83%
93656	11	275	4.00%
93657	83	1,618	5.13%
93660	7	146	4.79%
93662	119	1,223	9.73%
93665	4	21	19.05%
93666	4	44	9.09%
93667	2	43	4.65%
93668	1	86	1.16%
93670	1	39	2.56%
93673	5	37	13.51%
93675	13	107	12.15%
93701	55	464	11.85%
93702	99	761	13.01%
93703	92	882	10.43%
93704	37	709	5.22%
93705	31	411	7.54%
93706	156	1,797	8.68%
93710	60	1,275	4.71%
93711	109	1,779	6.13%
93720	44	1,535	2.87%
93721	78	850	9.18%

93722	118	1,949	6.05%
93723	10	171	5.85%
93725	92	1,334	6.90%
93726	69	962	7.17%
93727	114	1,976	5.77%
93728	69	615	11.22%
93730	3	110	2.73%
93737			
93741	2	39	5.13%
93901	133	2,075	6.41%
93905	44	658	6.69%
93906	59	760	7.76%
93907	67	915	7.32%
93908	24	648	3.70%
93920	2	56	3.57%
93921	19	300	6.33%
93923	33	972	3.40%
93924	22	416	5.29%
93925	4	66	6.06%
93926	10	242	4.13%
93927	23	348	6.61%
93930	35	595	5.88%
93932	6	79	7.59%
93933	32	634	5.05%
93940	226	2,327	9.71%
93950	20	607	3.29%
93954	2	55	3.64%
93955	46	873	5.27%
93960	24	411	5.84%
94002	48	799	6.01%
94005	13	259	5.02%
94010	59	1,455	4.05%
94014	46	889	5.17%
94015	21	594	3.54%
94018	7	177	3.95%
94019	22	601	3.66%
94020	2	62	3.23%
94022	23	776	2.96%
94024	17	318	5.35%
94025	50	1,078	4.64%
94027	9	209	4.31%
94028	3	180	1.67%
94030	15	430	3.49%
94037	2	35	5.71%
94038	8	53	15.09%
94040	30	791	3.79%
94041	21	406	5.17%
94043	40	974	4.11%
94044	32	674	4.75%

94060	8	155	5.16%
94061	18	463	3.89%
94062	31	550	5.64%
94063	142	1,682	8.44%
94065	3	160	1.88%
94066	66	797	8.28%
94070	76	1,513	5.02%
94080	88	1,941	4.53%
94085	18	484	3.72%
94086	26	751	3.46%
94087	19	910	2.09%
94089	15	408	3.68%
94101			
94102	114	1,245	9.16%
94103	126	2,077	6.07%
94104	6	116	5.17%
94105			
94106	36	446	8.07%
94107	90	1,564	5.75%
94108	87	1,365	6.37%
94109	118	1,828	6.46%
94110	137	2,061	6.65%
94111	28	472	5.93%
94112	67	922	7.27%
94114	37	764	4.84%
94115	43	933	4.61%
94116	23	574	4.01%
94117	49	756	6.48%
94118	56	1,110	5.05%
94121	27	628	4.30%
94122	47	1,060	4.43%
94123	65	911	7.14%
94124	106	1,499	7.07%
94127	17	394	4.31%
94129	3	63	4.76%
94131	19	296	6.42%
94132	16	313	5.11%
94133	96	1,316	7.29%
94134			
94142	23	399	5.76%
94158	3	81	3.70%
94303	16	288	5.56%
94305	4	82	4.88%
94401	39	1,024	3.81%
94402	24	575	4.17%
94403	32	940	3.40%
94404	9	445	2.02%
94501	56	816	6.86%
94502	3	92	3.26%

94503	14	344	4.07%
94505	3	45	6.67%
94506	7	245	2.86%
94507	11	277	3.97%
94508	5	130	3.85%
94509	127	1,450	8.76%
94510	42	1,116	3.76%
94511	10	141	7.09%
94513	63	1,477	4.27%
94514	7	272	2.57%
94515	14	534	2.62%
94517	9	192	4.69%
94518	34	540	6.30%
94519	12	345	3.48%
94520	139	1,858	7.48%
94521	15	500	3.00%
94523	41	962	4.26%
94525			
94569	9	142	6.34%
94526			
94528	25	1,006	2.49%
94530	28	616	4.55%
94531	12	316	3.80%
94533	118	1,902	6.20%
94534	35	725	4.83%
94536			
94537	63	1,140	5.53%
94538	146	2,587	5.64%
94539	66	1,236	5.34%
94540			
94541	102	1,411	7.23%
94542	4	102	3.92%
94544	135	1,521	8.88%
94545	130	2,031	6.40%
94546	30	986	3.04%
94547	5	252	1.98%
94548	10	79	12.66%
94549	30	869	3.45%
94550	43	1,498	2.87%
94551	53	1,443	3.67%
94552	6	217	2.76%
94553	67	1,515	4.42%
94555	3	238	1.26%
94556	11	284	3.87%
94558	95	2,350	4.04%
94559			
94581	63	1,254	5.02%
94560	75	1,143	6.56%
94561	18	527	3.42%

94563	13	401	3.24%
94564	25	534	4.68%
94565	102	1,344	7.59%
94566	48	1,426	3.37%
94567	2	54	3.70%
94568	45	1,260	3.57%
94512			
94571	22	345	6.38%
94572	5	168	2.98%
94573	6	116	5.17%
94574	29	901	3.22%
94577	117	2,241	5.22%
94578	54	775	6.97%
94579	15	246	6.10%
94580	23	390	5.90%
94582	1	77	1.30%
94583	27	1,161	2.33%
94585	45	781	5.76%
94586	3	118	2.54%
94587	51	1,201	4.25%
94588	55	924	5.95%
94589	21	329	6.38%
94590	140	1,466	9.55%
94591	21	618	3.40%
94595	8	285	2.81%
94596	41	1,040	3.94%
94597	17	456	3.73%
94598	16	477	3.35%
94599	7	157	4.46%
94601	100	1,189	8.41%
94602	40	447	8.95%
94603	41	372	11.02%
94605	57	660	8.64%
94606	75	998	7.52%
94607	125	1,819	6.87%
94608	79	1,145	6.90%
94609	66	701	9.42%
94610	26	654	3.98%
94516			
94611	40	923	4.33%
94612	107	1,101	9.72%
94618	19	439	4.33%
94619	19	372	5.11%
94621	68	820	8.29%
94702	30	445	6.74%
94703	19	358	5.31%
94704	64	986	6.49%
94705	14	431	3.25%
94706	34	524	6.49%

94707	24	335	7.16%
94709	16	363	4.41%
94710	29	1,147	2.53%
94720	4	63	6.35%
94801	49	742	6.60%
94803	46	494	9.31%
94804	96	1,175	8.17%
94805	25	333	7.51%
94806	68	854	7.96%
94901	92	2,164	4.25%
94903	20	881	2.27%
94904	11	248	4.44%
94920	14	336	4.17%
94922	1	34	2.94%
94923	1	106	0.94%
94925	14	385	3.64%
94928	50	1,014	4.93%
94930	15	211	7.11%
94931	20	498	4.02%
94933			
94937	2	60	3.33%
94939	11	397	2.77%
94941	32	890	3.60%
94945	23	717	3.21%
94946	6	57	10.53%
94947	16	389	4.11%
94949	45	873	5.15%
94951	12	167	7.19%
94952	89	2,005	4.44%
94954	45	1,146	3.93%
94956	3	149	2.01%
94957	4	83	4.82%
94960	22	434	5.07%
94965	32	767	4.17%
94970	1	39	2.56%
94971	1	32	3.13%
94972	2	33	6.06%
94973	1	18	5.56%
95002	4	76	5.26%
95003	34	662	5.14%
95004	4	94	4.26%
95005	3	99	3.03%
95006	11	182	6.04%
95008	86	1,819	4.73%
95010	20	566	3.53%
95012	49	407	12.04%
95013	4	48	8.33%
95014	38	1,238	3.07%
95017	3	46	6.52%

95018	13	214	6.07%
95019	8	113	7.08%
95020	120	2,191	5.48%
95023	115	1,697	6.78%
95030	32	782	4.09%
95032	19	703	2.70%
95033	5	159	3.14%
95035	106	1,864	5.69%
95037	78	1,827	4.27%
95039	4	123	3.25%
95043	3	157	1.91%
95045	26	281	9.25%
95046	22	348	6.32%
95050	45	802	5.61%
95051	23	499	4.61%
95054	44	817	5.39%
95060	223	2,040	10.93%
95062	75	1,072	7.00%
95065	12	277	4.33%
95066	25	595	4.20%
95070	32	693	4.62%
95073	38	542	7.01%
95075	2	48	4.17%
95076	151	2,707	5.58%
95110	69	753	9.16%
95111	62	749	8.28%
95112	241	2,548	9.46%
95113	55	364	15.11%
95116	76	833	9.12%
95117	13	245	5.31%
95118	16	460	3.48%
95119	17	325	5.23%
95120	10	356	2.81%
95121	18	367	4.90%
95122	64	906	7.06%
95123	42	926	4.54%
95124	42	752	5.59%
95125	115	1,381	8.33%
95126	76	1,019	7.46%
95127	40	579	6.91%
95128	68	1,087	6.26%
95129	39	799	4.88%
95130	2	99	2.02%
95131	57	1,299	4.39%
95132	14	362	3.87%
95133	37	506	7.31%
95134	21	333	6.31%
95135	14	189	7.41%
95136	18	402	4.48%

95138	17	293	5.80%
95139	6	63	9.52%
95140	1	20	5.00%
95148			
95150	10	246	4.07%
95202	77	601	12.81%
95203	30	507	5.92%
95204	49	721	6.80%
95205	140	1,462	9.58%
95206	52	1,114	4.67%
95207	75	1,427	5.26%
95209	16	414	3.86%
95210	26	617	4.21%
95212	14	337	4.15%
95215	56	991	5.65%
95219	10	538	1.86%
95220	42	613	6.85%
95222	13	350	3.71%
95223	8	288	2.78%
95224	2	31	6.45%
95225			
95226	3	56	5.36%
95227	23	204	11.27%
95228	8	171	4.68%
95230	4	77	5.19%
95231	13	168	7.74%
95236	16	364	4.40%
95237	8	151	5.30%
95240	106	1,877	5.65%
95242	22	715	3.08%
95245	7	55	12.73%
95246	6	80	7.50%
95247	4	253	1.58%
95248	4	45	8.89%
95249	11	260	4.23%
95252	13	273	4.76%
95253	4	35	11.43%
95254	2	36	5.56%
95255	3	82	3.66%
95257	2	21	9.52%
95258	6	76	7.89%
95301	56	815	6.87%
95303	2	31	6.45%
95304	45	741	6.07%
95306	3	73	4.11%
95307	34	420	8.10%
95310	7	104	6.73%
95311	11	119	9.24%
95312	3	30	10.00%

95313	1	30	3.33%
95315	1	54	1.85%
95317	8	107	7.48%
95319	1	28	3.57%
95320	22	805	2.73%
95321	10	221	4.52%
95322	23	456	5.04%
95324	4	77	5.19%
95325	1	19	5.26%
95326	3	93	3.23%
95327	11	259	4.25%
95329	1	54	1.85%
95330	29	424	6.84%
95333	11	212	5.19%
95334	36	486	7.41%
95336	72	1,268	5.68%
95337	31	680	4.56%
95338	27	528	5.11%
95340	95	1,782	5.33%
95341	25	285	8.77%
95346	3	60	5.00%
95348	25	611	4.09%
95350	48	876	5.48%
95351	38	508	7.48%
95354	51	768	6.64%
95355	22	484	4.55%
95356	26	495	5.25%
95357	2	79	2.53%
95358	8	152	5.26%
95360	15	299	5.02%
95361	80	1,570	5.10%
95363	21	292	7.19%
95365	2	96	2.08%
95366	22	569	3.87%
95367	34	337	10.09%
95368	13	110	11.82%
95369	3	132	2.27%
95370	45	1,388	3.24%
95374	5	106	4.72%
95376	71	1,476	4.81%
95377	10	294	3.40%
95379	6	119	5.04%
95380	44	881	4.99%
95382	11	341	3.23%
95383	9	176	5.11%
95385	1	33	3.03%
95386	4	82	4.88%
95387	6	115	5.22%
95388	32	393	8.14%

95389	1	21	4.76%
95391	1	24	4.17%
95401			
95473	64	1,333	4.80%
95403	100	1,723	5.80%
95404	91	1,601	5.68%
95405	21	601	3.49%
95407	83	1,315	6.31%
95409	7	417	1.68%
95410	4	55	7.27%
95415			
95417	2	115	1.74%
95421			
95480	6	149	4.03%
95422	35	348	10.06%
95423	10	130	7.69%
95425	28	478	5.86%
95426	7	64	10.94%
95427	1	27	3.70%
95428			
95429	23	187	12.30%
95430	5	32	15.63%
95432	1	25	4.00%
95435	5	40	12.50%
95436	4	200	2.00%
95437	32	737	4.34%
95439	2	61	3.28%
95441	10	291	3.44%
95442	8	238	3.36%
95443			
95444	3	45	6.67%
95445	3	174	1.72%
95446	11	246	4.47%
95448	36	1,248	2.88%
95449	11	156	7.05%
95450	2	34	5.88%
95451	30	425	7.06%
95452	5	122	4.10%
95453	65	771	8.43%
95454	20	165	12.12%
95456	3	42	7.14%
95457	10	196	5.10%
95458	3	69	4.35%
95459	1	38	2.63%
95460	10	261	3.83%
95461	17	236	7.20%
95462			
95486	7	65	10.77%
95463	1	17	5.88%

95464	7	67	10.45%
95465	7	82	8.54%
95466	3	121	2.48%
95467	4	41	9.76%
95468	11	126	8.73%
95469	6	125	4.80%
95470	21	267	7.87%
95471			
95472	71	1,481	4.79%
95476	91	1,907	4.77%
95482	79	1,443	5.47%
95485	14	188	7.45%
95488	1	24	4.17%
95490	41	669	6.13%
95492	29	729	3.98%
95494	3	44	6.82%
95497	1	20	5.00%
95501	81	1,469	5.51%
95503	14	497	2.82%
95511	5	19	26.32%
95518	1	26	3.85%
95519	18	399	4.51%
95521	52	998	5.21%
95524	1	56	1.79%
95525	10	95	10.53%
95526	4	70	5.71%
95528	3	57	5.26%
95536	12	329	3.65%
95537	2	17	11.76%
95540	29	648	4.48%
95542			
95545	25	240	10.42%
95546	18	206	8.74%
95547	3	32	9.38%
95549	1	31	3.23%
95551	7	123	5.69%
95553	4	48	8.33%
95554	7	34	20.59%
95555	4	67	5.97%
95558	6	41	14.63%
95559	1	16	6.25%
95560	20	158	12.66%
95562	10	95	10.53%
95563			
95568	2	42	4.76%
95564	3	29	10.34%
95565	2	69	2.90%
95569	4	50	8.00%
95570	4	126	3.17%

95571	1	21	4.76%
95573	9	151	5.96%
95587	1	27	3.70%
95589	1	37	2.70%
95595	2	18	11.11%
95601	2	34	5.88%
95602	30	527	5.69%
95603	63	1,836	3.43%
95605	14	273	5.13%
95606	3	58	5.17%
95607	1	59	1.69%
95608	33	541	6.10%
95610	16	383	4.18%
95612	4	161	2.48%
95613	2	30	6.67%
95614	5	84	5.95%
95616	52	1,469	3.54%
95618	8	164	4.88%
95619	11	233	4.72%
95620	37	823	4.50%
95621	6	176	3.41%
95623	10	113	8.85%
95624	22	431	5.10%
95626	9	59	15.25%
95627	6	147	4.08%
95628	25	349	7.16%
95630	49	988	4.96%
95631	4	109	3.67%
95632	26	336	7.74%
95633	3	71	4.23%
95634	7	182	3.85%
95635	1	25	4.00%
95637	5	60	8.33%
95640	9	347	2.59%
95641	18	177	10.17%
95642	31	567	5.47%
95645	1	79	1.27%
95648	46	950	4.84%
95650	30	622	4.82%
95651	5	47	10.64%
95652	8	116	6.90%
95653	2	28	7.14%
95654	3	68	4.41%
95658	18	277	6.50%
95659	9	160	5.63%
95660	16	302	5.30%
95661	33	647	5.10%
95662	13	199	6.53%
95663	6	98	6.12%

95665	6	200	3.00%
95666	10	179	5.59%
95667	86	1,372	6.27%
95668	18	202	8.91%
95669	18	292	6.16%
95670	24	491	4.89%
95672	2	74	2.70%
95673	4	84	4.76%
95674	6	94	6.38%
95676	3	39	7.69%
95677	43	909	4.73%
95678	36	926	3.89%
95681	4	85	4.71%
95682	46	866	5.31%
95684	6	140	4.29%
95685	16	321	4.98%
95686	4	84	4.76%
95687	40	944	4.24%
95688	54	1,335	4.04%
95690	7	152	4.61%
95691	68	1,284	5.30%
95692	13	237	5.49%
95694	30	443	6.77%
95695	78	1,270	6.14%
95697	2	34	5.88%
95698	2	25	8.00%
95703	2	51	3.92%
95709	4	136	2.94%
95713	25	298	8.39%
95714	2	22	9.09%
95604			
95715	2	64	3.13%
95717	2	34	5.88%
95721	1	15	6.67%
95722	1	112	0.89%
95726	8	167	4.79%
95742	5	216	2.31%
95746	14	398	3.52%
95747	12	289	4.15%
95757	10	69	14.49%
95758	28	500	5.60%
95762	48	914	5.25%
95765	37	772	4.79%
95776	40	703	5.69%
95811	23	229	10.04%
95814	41	583	7.03%
95815	36	462	7.79%
95816	28	2,296	1.22%
95817	8	167	4.79%

95818	21	337	6.23%
95819	21	239	8.79%
95820	40	350	11.43%
95821	28	378	7.41%
95822	27	347	7.78%
95823	49	606	8.09%
95824	19	187	10.16%
95825	41	805	5.09%
95826	16	366	4.37%
95827	22	327	6.73%
95828	22	306	7.19%
95829	3	51	5.88%
95831	6	159	3.77%
95832	3	41	7.32%
95833	9	187	4.81%
95834	33	746	4.42%
95838	16	240	6.67%
95841	19	298	6.38%
95842	4	98	4.08%
95843	5	100	5.00%
95864	5	139	3.60%
95901	109	1,329	8.20%
95910	1	19	5.26%
95912	20	335	5.97%
95913	1	45	2.22%
95914	5	47	10.64%
95917	15	198	7.58%
95918	6	87	6.90%
95919	2	51	3.92%
95920	2	79	2.53%
95922	1	41	2.44%
95923	1	19	5.26%
95925			
95941	2	27	7.41%
95926			
95929	70	1,722	4.07%
95928	107	2,129	5.03%
95932	37	610	6.07%
95934	1	25	4.00%
95935	2	39	5.13%
95936	1	43	2.33%
95937	6	102	5.88%
95938	16	364	4.40%
95939	6	40	15.00%
95942	7	93	7.53%
95943	4	155	2.58%
95945	87	1,551	5.61%
95946	14	226	6.19%
95947	5	103	4.85%

95948	26	536	4.85%
95949	18	438	4.11%
95950	1	46	2.17%
95951	2	59	3.39%
95953	33	585	5.64%
95954			
95978	3	122	2.46%
95955	13	163	7.98%
95957	1	136	0.74%
95959	29	758	3.83%
95960	2	27	7.41%
95961	19	319	5.96%
95962	1	56	1.79%
95963	59	1,055	5.59%
95916			
95965	50	930	5.38%
95966	48	933	5.14%
95968	8	47	17.02%
95969	24	454	5.29%
95970	4	95	4.21%
95971	6	353	1.70%
95973	72	1,302	5.53%
95974	1	65	1.54%
95975	2	56	3.57%
95977	6	53	11.32%
95979	3	58	5.17%
95982	9	126	7.14%
95983	1	36	2.78%
95987	20	373	5.36%
95988	22	628	3.50%
95991	155	1,823	8.50%
95993	62	1,179	5.26%
96001	46	899	5.12%
96002	47	995	4.72%
96003	35	666	5.26%
96007	55	830	6.63%
96009	2	27	7.41%
96013	7	194	3.61%
96016	2	24	8.33%
96019	9	90	10.00%
96020	6	214	2.80%
96021	48	881	5.45%
96022	25	366	6.83%
96028	5	161	3.11%
96029	2	23	8.70%
96033	3	19	15.79%
96035	9	114	7.89%
96040	2	37	5.41%
96051	1	78	1.28%

96055	10	178	5.62%
96056	4	146	2.74%
96059	1	36	2.78%
96062	1	36	2.78%
96069	1	30	3.33%
96073	9	172	5.23%
96074	1	18	5.56%
96075	1	28	3.57%
96076	2	29	6.90%
96080	71	1,442	4.92%
96088	5	109	4.59%
96090	2	15	13.33%
96092	2	64	3.13%
96095	2	19	10.53%
96125	4	59	6.78%
96137	5	153	3.27%
<b>Total</b>	<b>23,138</b>	<b>411,552</b>	

## Appendix E - Small Business (Q2)

- 2) The number and percent of unique customers, by ZIP code, who are
- a. more than 90 days in arrears,
  - b. not enrolled in a Recent Applicable Payment Plan or conventional extended payment plan, and
  - c. more than \$250 in total arrears.

Zip Code	Unique Customer Count	Total Active Customer Count	Percent of Unique Customers
[A]	[B]	[C]	[D] = [B]/[C]
93101			
93105	2	28	7.14%
93201	3	74	4.05%
93203	14	369	3.79%
93204	7	186	3.76%
93206	2	173	1.16%
93210	18	417	4.32%
93212	27	380	7.11%
93224	1	28	3.57%
93230	14	400	3.50%
93234	7	193	3.63%
93239	5	87	5.75%
93241	13	218	5.96%
93242	11	253	4.35%
93245	33	1,004	3.29%
93249	3	159	1.89%
93250	21	238	8.82%
93251	2	70	2.86%
93252	1	89	1.12%
93254	3	92	3.26%
93263	20	624	3.21%
93266	9	79	11.39%
93268	24	471	5.10%
93280	32	641	4.99%
93286	10	224	4.46%
93301	117	1,781	6.57%
93304	74	970	7.63%
93305	83	839	9.89%
93306	35	715	4.90%
93307	126	1,652	7.63%
93308	120	2,050	5.85%
93309	59	1,233	4.79%
93311	13	513	2.53%
93312	42	797	5.27%
93313	68	1,125	6.04%
93314	18	382	4.71%
93401	75	2,776	2.70%
93402	20	364	5.49%
93405	10	407	2.46%
93408			
93410	2	18	11.11%
93420	31	1,292	2.40%
93422	44	1,207	3.65%
93424	2	114	1.75%
93426	4	140	2.86%
93427	21	480	4.38%
93428	10	406	2.46%
93430	4	214	1.87%
93432	10	175	5.71%
93433	22	589	3.74%
93434	4	145	2.76%
93436	13	399	3.26%

93440	8	118	6.78%
93441	3	172	1.74%
93442	14	636	2.20%
93444	20	569	3.51%
93445	7	163	4.29%
93446	61	2,512	2.43%
93449	9	425	2.12%
93451	5	297	1.68%
93453	5	243	2.06%
93454	61	1,503	4.06%
93455	36	1,224	2.94%
93458	39	748	5.21%
93460	9	596	1.51%
93461	2	143	1.40%
93463	16	610	2.62%
93465	14	607	2.31%
92365			
93516			
93523	4	78	5.13%
93555	13	540	2.41%
93602	4	140	2.86%
93603	3	40	7.50%
93604	2	64	3.13%
93608	3	71	4.23%
93609	15	260	5.77%
93610	50	782	6.39%
93611	20	1,112	1.80%
93612	103	1,581	6.51%
93614	8	205	3.90%
93615	10	183	5.46%
93616	12	118	10.17%
93618	65	1,060	6.13%
93619	13	365	3.56%
93620	19	443	4.29%
93621	1	35	2.86%
93622	15	526	2.85%
93624	4	88	4.55%
93625	17	464	3.66%
93626	1	81	1.23%
93630	55	886	6.21%
93631	31	890	3.48%
93633	2	23	8.70%
93635	62	1,180	5.25%
93636	14	209	6.70%
93637	73	1,490	4.90%
93638			
93639	59	1,064	5.55%
93640	11	314	3.50%
93641	2	28	7.14%
93643	6	149	4.03%
93644	26	626	4.15%
93645	1	40	2.50%
93646	14	461	3.04%
93647	37	473	7.82%
93648	26	301	8.64%
93650	9	162	5.56%
93652	2	27	7.41%
93654	59	1,356	4.35%
93656	10	275	3.64%
93657	66	1,618	4.08%
93660	7	146	4.79%

93662	105	1,223	8.59%
93665	3	21	14.29%
93666	3	44	6.82%
93667	2	43	4.65%
93668	1	86	1.16%
93670	1	39	2.56%
93673	5	37	13.51%
93675	5	107	4.67%
93701	37	464	7.97%
93702	78	761	10.25%
93703	81	882	9.18%
93704	31	709	4.37%
93705	29	411	7.06%
93706	130	1,797	7.23%
93710	49	1,275	3.84%
93711	96	1,779	5.40%
93720	40	1,535	2.61%
93721	68	850	8.00%
93722	96	1,949	4.93%
93723	8	171	4.68%
93725	76	1,334	5.70%
93726	61	962	6.34%
93727	90	1,976	4.55%
93728	57	615	9.27%
93730	1	110	0.91%
93737			
93741	2	39	5.13%
93901	92	2,075	4.43%
93905	33	658	5.02%
93906	52	760	6.84%
93907	42	915	4.59%
93908	11	648	1.70%
93920	2	56	3.57%
93921	11	300	3.67%
93923	24	972	2.47%
93924	17	416	4.09%
93925	2	66	3.03%
93926	9	242	3.72%
93927	18	348	5.17%
93930	25	595	4.20%
93932	6	79	7.59%
93933	20	634	3.15%
93940	86	2,327	3.70%
93950	13	607	2.14%
93954	1	55	1.82%
93955	39	873	4.47%
93960	20	411	4.87%
94002	42	799	5.26%
94005	9	259	3.47%
94010	45	1,455	3.09%
94014	36	889	4.05%
94015	19	594	3.20%
94018	7	177	3.95%
94019	16	601	2.66%
94020	1	62	1.61%
94022	17	776	2.19%
94024	7	318	2.20%
94025	28	1,078	2.60%
94027	5	209	2.39%
94028	2	180	1.11%
94030	13	430	3.02%

94037	2	35	5.71%
94038	3	53	5.66%
94040	25	791	3.16%
94041	16	406	3.94%
94043	31	974	3.18%
94044	30	674	4.45%
94060	5	155	3.23%
94061	10	463	2.16%
94062	9	550	1.64%
94063	117	1,682	6.96%
94065	3	160	1.88%
94066	55	797	6.90%
94070	61	1,513	4.03%
94080	71	1,941	3.66%
94085	15	484	3.10%
94086	21	751	2.80%
94087	16	910	1.76%
94089	12	408	2.94%
94101			
94102	96	1,245	7.71%
94103	111	2,077	5.34%
94104	5	116	4.31%
94105			
94106	32	446	7.17%
94107	77	1,564	4.92%
94108	68	1,365	4.98%
94109	101	1,828	5.53%
94110	113	2,061	5.48%
94111	23	472	4.87%
94112	54	922	5.86%
94114	25	764	3.27%
94115	34	933	3.64%
94116	18	574	3.14%
94117	42	756	5.56%
94118	45	1,110	4.05%
94121	22	628	3.50%
94122	37	1,060	3.49%
94123	56	911	6.15%
94124	91	1,499	6.07%
94127	15	394	3.81%
94129	2	63	3.17%
94131	11	296	3.72%
94132	12	313	3.83%
94133	81	1,316	6.16%
94134			
94142	22	399	5.51%
94158	2	81	2.47%
94303	13	288	4.51%
94305	3	82	3.66%
94401	29	1,024	2.83%
94402	17	575	2.96%
94403	28	940	2.98%
94404	8	445	1.80%
94501	32	816	3.92%
94502	2	92	2.17%
94503	12	344	3.49%
94505	3	45	6.67%
94506	5	245	2.04%
94507	8	277	2.89%
94508	4	130	3.08%
94509	113	1,450	7.79%

94510	34	1,116	3.05%
94511	8	141	5.67%
94513	51	1,477	3.45%
94514	7	272	2.57%
94515	12	534	2.25%
94517	7	192	3.65%
94518	29	540	5.37%
94519	12	345	3.48%
94520	119	1,858	6.40%
94521	11	500	2.20%
94523	37	962	3.85%
94525			
94569	7	142	4.93%
94526	22	994	2.21%
94530	21	616	3.41%
94531	11	316	3.48%
94533	96	1,902	5.05%
94534	31	725	4.28%
94536			
94537	46	1,140	4.04%
94538	116	2,587	4.48%
94539	57	1,236	4.61%
94540			
94541	90	1,411	6.38%
94542	3	102	2.94%
94544	109	1,521	7.17%
94545	110	2,031	5.42%
94546	23	986	2.33%
94547	3	252	1.19%
94548	6	79	7.59%
94549	24	869	2.76%
94550	36	1,498	2.40%
94551	46	1,443	3.19%
94552	3	217	1.38%
94553	52	1,515	3.43%
94555	3	238	1.26%
94556	5	284	1.76%
94558	75	2,350	3.19%
94559			
94581	51	1,254	4.07%
94560	63	1,143	5.51%
94561	14	527	2.66%
94563	5	401	1.25%
94564	21	534	3.93%
94565	89	1,344	6.62%
94566	42	1,426	2.95%
94567	2	54	3.70%
94568	34	1,260	2.70%
94512			
94571	16	345	4.64%
94572	3	168	1.79%
94573	5	116	4.31%
94574	22	901	2.44%
94577	101	2,241	4.51%
94578	47	775	6.06%
94579	11	246	4.47%
94580	22	390	5.64%
94582	1	77	1.30%
94583	21	1,161	1.81%
94585	36	781	4.61%
94586	3	118	2.54%

94587	46	1,201	3.83%
94588	49	924	5.30%
94589	18	329	5.47%
94590	112	1,466	7.64%
94591	20	618	3.24%
94595	5	285	1.75%
94596	30	1,040	2.88%
94597	12	456	2.63%
94598	11	477	2.31%
94599	5	157	3.18%
94601	90	1,189	7.57%
94602	28	447	6.26%
94603	34	372	9.14%
94605	45	660	6.82%
94606	59	998	5.91%
94607	96	1,819	5.28%
94608	62	1,145	5.41%
94609	52	701	7.42%
94610	19	654	2.91%
94516			
94611	36	923	3.90%
94612	95	1,101	8.63%
94618	16	439	3.64%
94619	15	372	4.03%
94621	59	820	7.20%
94702	25	445	5.62%
94703	11	358	3.07%
94704	56	986	5.68%
94705	12	431	2.78%
94706	26	524	4.96%
94707	19	335	5.67%
94709	12	363	3.31%
94710	23	1,147	2.01%
94801	36	742	4.85%
94803	23	494	4.66%
94804	68	1,175	5.79%
94805	19	333	5.71%
94806	56	854	6.56%
94901	75	2,164	3.47%
94903	16	881	1.82%
94904	10	248	4.03%
94920	10	336	2.98%
94922	1	34	2.94%
94923	1	106	0.94%
94925	11	385	2.86%
94928	41	1,014	4.04%
94930	13	211	6.16%
94931	18	498	3.61%
94933			
94937	2	60	3.33%
94939	6	397	1.51%
94941	21	890	2.36%
94945	16	717	2.23%
94946	3	57	5.26%
94947	13	389	3.34%
94949	28	873	3.21%
94951	11	167	6.59%
94952	69	2,005	3.44%
94954	32	1,146	2.79%
94956	2	149	1.34%
94957	4	83	4.82%

94960	16	434	3.69%
94965	22	767	2.87%
94970	1	39	2.56%
94971	1	32	3.13%
94972	2	33	6.06%
94973	1	18	5.56%
95002	3	76	3.95%
95003	23	662	3.47%
95004	3	94	3.19%
95005	2	99	2.02%
95006	8	182	4.40%
95008	73	1,819	4.01%
95010	18	566	3.18%
95012	26	407	6.39%
95013	3	48	6.25%
95014	28	1,238	2.26%
95017	3	46	6.52%
95018	8	214	3.74%
95019	5	113	4.42%
95020	100	2,191	4.56%
95023	91	1,697	5.36%
95030	26	782	3.32%
95032	16	703	2.28%
95033	3	159	1.89%
95035	89	1,864	4.77%
95037	66	1,827	3.61%
95039	3	123	2.44%
95043	3	157	1.91%
95045	15	281	5.34%
95046	17	348	4.89%
95050	27	802	3.37%
95051	15	499	3.01%
95054	30	817	3.67%
95060	86	2,040	4.22%
95062	39	1,072	3.64%
95065	8	277	2.89%
95066	21	595	3.53%
95070	25	693	3.61%
95073	29	542	5.35%
95075	1	48	2.08%
95076	131	2,707	4.84%
95110	58	749	7.74%
95111	56	749	7.48%
95112	205	2,548	8.05%
95113	38	364	10.44%
95116	63	833	7.56%
95117	13	245	5.31%
95118	14	460	3.04%
95119	10	325	3.08%
95120	7	356	1.97%
95121	14	367	3.81%
95122	55	906	6.07%
95123	36	926	3.89%
95124	35	752	4.65%
95125	91	1,381	6.59%
95126	68	1,019	6.67%
95127	32	579	5.53%
95128	55	1,087	5.06%
95129	31	799	3.88%
95130	2	99	2.02%
95131	49	1,299	3.77%

95132	12	362	3.31%
95133	31	506	6.13%
95134	15	333	4.50%
95135	11	189	5.82%
95136	11	402	2.74%
95138	14	293	4.78%
95139	6	63	9.52%
95148	7	245	2.86%
95202	64	601	10.65%
95203	25	507	4.93%
95204	38	721	5.27%
95205	112	1,462	7.66%
95206	39	1,114	3.50%
95207	68	1,427	4.77%
95209	14	414	3.38%
95210	24	617	3.89%
95212	12	337	3.56%
95215	43	991	4.34%
95219	7	538	1.30%
95220	32	613	5.22%
95222	8	350	2.29%
95223	8	288	2.78%
95224	2	31	6.45%
95225			
95226	3	56	5.36%
95227	16	204	7.84%
95228	5	171	2.92%
95230	4	77	5.19%
95231	11	168	6.55%
95236	13	364	3.57%
95237	6	151	3.97%
95240	69	1,877	3.68%
95242	15	715	2.10%
95245	6	55	10.91%
95246	2	80	2.50%
95247	1	253	0.40%
95248	3	45	6.67%
95249	7	260	2.69%
95252	11	273	4.03%
95253	3	35	8.57%
95254	1	36	2.78%
95255	3	82	3.66%
95258	5	76	6.58%
95301	45	815	5.52%
95304	40	741	5.40%
95306	3	73	4.11%
95307	15	420	3.57%
95310	3	104	2.88%
95311	9	119	7.56%
95312	3	30	10.00%
95313	1	30	3.33%
95315	1	54	1.85%
95317	5	107	4.67%
95319	1	28	3.57%
95320	14	805	1.74%
95321	4	221	1.81%
95322	15	456	3.29%
95326	2	93	2.15%
95327	10	259	3.86%
95329	1	54	1.85%
95330	26	424	6.13%

95333	8	212	3.77%
95334	23	486	4.73%
95336	59	1,268	4.65%
95337	31	680	4.56%
95338	17	528	3.22%
95340	68	1,782	3.82%
95341	21	285	7.37%
95346	2	60	3.33%
95348	20	611	3.27%
95350	27	876	3.08%
95351	20	508	3.94%
95354	24	768	3.13%
95355	14	484	2.89%
95356	14	495	2.83%
95357	1	79	1.27%
95358	5	152	3.29%
95360	8	299	2.68%
95361	65	1,570	4.14%
95363	14	292	4.79%
95365	1	96	1.04%
95366	15	569	2.64%
95367	23	337	6.82%
95368	5	110	4.55%
95369	2	132	1.52%
95370	32	1,388	2.31%
95374	3	106	2.83%
95376	56	1,476	3.79%
95377	5	294	1.70%
95379	5	119	4.20%
95380	17	881	1.93%
95382	7	341	2.05%
95383	7	176	3.98%
95385	1	33	3.03%
95386	3	82	3.66%
95387	3	115	2.61%
95388	26	393	6.62%
95401			
95473	57	1,333	4.28%
95403	77	1,723	4.47%
95404	64	1,601	4.00%
95405	16	601	2.66%
95407	66	1,315	5.02%
95409	7	417	1.68%
95410	3	55	5.45%
95415			
95417	2	115	1.74%
95421	5	137	3.65%
95422	27	348	7.76%
95423	7	130	5.38%
95425	26	478	5.44%
95426	6	64	9.38%
95427	1	27	3.70%
95428	16	185	8.65%
95430	3	32	9.38%
95432	1	25	4.00%
95435	2	40	5.00%
95436	4	200	2.00%
95437	15	737	2.04%
95439	2	61	3.28%
95441	6	291	2.06%
95442	4	238	1.68%

95444	2	35	5.71%
95445	3	174	1.72%
95446	7	246	2.85%
95448	22	1,248	1.76%
95449	7	156	4.49%
95450	2	34	5.88%
95451	25	425	5.88%
95452	4	122	3.28%
95453	42	771	5.45%
95454	11	165	6.67%
95456	2	42	4.76%
95457	4	196	2.04%
95458	2	69	2.90%
95459	1	38	2.63%
95460	8	261	3.07%
95461	12	236	5.08%
95462			
95486	6	65	9.23%
95464	5	67	7.46%
95465	6	82	7.32%
95466	3	121	2.48%
95467	2	41	4.88%
95468	7	126	5.56%
95469	5	125	4.00%
95470	16	267	5.99%
95471			
95472	60	1,481	4.05%
95476	68	1,907	3.57%
95482	59	1,443	4.09%
95485	12	188	6.38%
95488	1	24	4.17%
95490	30	669	4.48%
95492	20	729	2.74%
95494	3	44	6.82%
95497	1	20	5.00%
95501	67	1,469	4.56%
95503	9	497	1.81%
95511	3	19	15.79%
95519	15	399	3.76%
95521	42	998	4.21%
95525	8	95	8.42%
95526	3	70	4.29%
95528	3	57	5.26%
95536	8	329	2.43%
95537	1	17	5.88%
95540	24	648	3.70%
95542			
95545	18	240	7.50%
95546	3	206	1.46%
95547	1	32	3.13%
95549	1	31	3.23%
95551	3	123	2.44%
95553	2	48	4.17%
95554	6	34	17.65%
95555	3	67	4.48%
95558	5	41	12.20%
95559	1	16	6.25%
95560	16	158	10.13%
95562	9	95	9.47%
95563			
95568	2	42	4.76%

95564	1	29	3.45%
95565	2	69	2.90%
95569	4	50	8.00%
95570	3	126	2.38%
95571	1	21	4.76%
95573	5	151	3.31%
95587	1	27	3.70%
95589	1	37	2.70%
95595	1	18	5.56%
95601	2	34	5.88%
95602	22	527	4.17%
95603	52	1,836	2.83%
95605	13	273	4.76%
95606	3	58	5.17%
95607	1	59	1.69%
95608	19	541	3.51%
95610	8	383	2.09%
95612	4	161	2.48%
95613	1	30	3.33%
95614	4	84	4.76%
95616	41	1,469	2.79%
95618	7	164	4.27%
95619	11	233	4.72%
95620	29	823	3.52%
95621	4	176	2.27%
95623	7	113	6.19%
95624	12	431	2.78%
95626	7	59	11.86%
95627	6	147	4.08%
95628	16	349	4.58%
95630	28	988	2.83%
95631	3	109	2.75%
95632	19	336	5.65%
95633	1	71	1.41%
95634	4	182	2.20%
95635	1	25	4.00%
95637	4	60	6.67%
95640	7	347	2.02%
95641	14	177	7.91%
95642	20	567	3.53%
95648	32	950	3.37%
95650	19	622	3.05%
95651	3	47	6.38%
95652	7	116	6.03%
95653	2	28	7.14%
95654	3	68	4.41%
95658	13	277	4.69%
95659	6	160	3.75%
95660	6	302	1.99%
95661	18	647	2.78%
95662	8	199	4.02%
95663	6	98	6.12%
95665	3	200	1.50%
95666	9	179	5.03%
95667	65	1,372	4.74%
95668	12	202	5.94%
95669	15	292	5.14%
95670	15	491	3.05%
95673	3	84	3.57%
95674	5	94	5.32%
95676	3	39	7.69%

95677	39	909	4.29%
95678	21	926	2.27%
95681	4	85	4.71%
95682	40	866	4.62%
95684	6	140	4.29%
95685	9	321	2.80%
95686	3	84	3.57%
95687	35	944	3.71%
95688	43	1,335	3.22%
95690	6	152	3.95%
95691	55	1,284	4.28%
95692	11	237	4.64%
95694	23	443	5.19%
95695	60	1,270	4.72%
95697	2	34	5.88%
95698	1	25	4.00%
95703	1	51	1.96%
95709	4	136	2.94%
95713	16	298	5.37%
95714	1	22	4.55%
95604			
95715	2	64	3.13%
95717	2	34	5.88%
95722	1	112	0.89%
95726	8	167	4.79%
95742	2	216	0.93%
95746	12	398	3.02%
95747	8	289	2.77%
95757	7	69	10.14%
95758	11	500	2.20%
95762	34	914	3.72%
95765	30	772	3.89%
95776	32	703	4.55%
95811	17	229	7.42%
95814	29	583	4.97%
95815	21	462	4.55%
95816	16	2,296	0.70%
95817	8	167	4.79%
95818	15	337	4.45%
95819	15	239	6.28%
95820	28	350	8.00%
95821	18	378	4.76%
95822	9	347	2.59%
95823	28	606	4.62%
95824	11	187	5.88%
95825	27	805	3.35%
95826	10	366	2.73%
95827	13	327	3.98%
95828	11	306	3.59%
95829	2	51	3.92%
95831	2	159	1.26%
95832	1	41	2.44%
95833	8	187	4.28%
95834	22	746	2.95%
95838	11	240	4.58%
95841	12	298	4.03%
95842	3	98	3.06%
95843	3	100	3.00%
95864	2	139	1.44%
95901	89	1,329	6.70%
95910	1	19	5.26%

95912	12	335	3.58%
95914	4	47	8.51%
95917	11	198	5.56%
95918	4	87	4.60%
95919	1	51	1.96%
95920	2	79	2.53%
95923	1	19	5.26%
95926			
95929	60	1,722	3.48%
95928	89	2,129	4.18%
95932	27	610	4.43%
95934	1	25	4.00%
95935	2	39	5.13%
95936	1	43	2.33%
95937	4	102	3.92%
95938	14	364	3.85%
95939	5	40	12.50%
95942	6	93	6.45%
95943	3	155	1.94%
95945	71	1,551	4.58%
95946	10	226	4.42%
95947	4	103	3.88%
95948	19	536	3.54%
95949	14	438	3.20%
95951	2	59	3.39%
95953	26	585	4.44%
95954	1	113	0.88%
95955	9	163	5.52%
95957	1	136	0.74%
95959	20	758	2.64%
95960	2	27	7.41%
95961	8	319	2.51%
95962	1	56	1.79%
95963	38	1,055	3.60%
95965	35	919	3.81%
95966	36	933	3.86%
95968	5	47	10.64%
95969	16	454	3.52%
95970	4	95	4.21%
95971	2	353	0.57%
95973	61	1,302	4.69%
95975	2	56	3.57%
95977	4	53	7.55%
95979	3	58	5.17%
95982	8	126	6.35%
95983	1	36	2.78%
95987	18	373	4.83%
95988	13	628	2.07%
95991	134	1,823	7.35%
95993	55	1,179	4.66%
96001	31	899	3.45%
96002	30	995	3.02%
96003	23	666	3.45%
96007	43	830	5.18%
96009	2	27	7.41%
96013	5	194	2.58%
96016	2	24	8.33%
96019	6	90	6.67%
96020	5	214	2.34%
96021	36	881	4.09%
96022	19	366	5.19%

96028	4	161	2.48%
96029	2	23	8.70%
96033	3	19	15.79%
96035	6	114	5.26%
96040	2	37	5.41%
96055	3	178	1.69%
96056	3	146	2.05%
96062	1	36	2.78%
96073	7	172	4.07%
96074	1	18	5.56%
96075	1	28	3.57%
96076	2	29	6.90%
96080	51	1,442	3.54%
96088	3	109	2.75%
96090	2	15	13.33%
96092	2	64	3.13%
96095	2	19	10.53%
96125	4	59	6.78%
96137	4	153	2.61%
<b>Total</b>	<b>17,767</b>	<b>410,277</b>	

Advice 4414-G/6142-E  
April 1, 2021

## **Attachment 2**

### **Tariff Revisions**



**GAS RULE NO. 11**  
DISCONTINUANCE AND RESTORATION OF SERVICE

Sheet 1

If PG&E terminates or refuses to restore service to a Customer or any other person for any of the reasons or upon any of the grounds stated herein, PG&E shall incur no liability whatsoever to said Customer or person or to any other Customers or persons.

**A. APPLICABILITY**

This Rule applies to Core/Noncore End-Use Customers.

See Rule 23 for services provided to Core Transport Agents (CTA) and for additional requirements for Core Customers served on Schedule G-CT.

**B. CUSTOMER REQUEST TO TERMINATE LIABILITY FOR PAYMENT FOR SERVICE**

**1. SERVICE TO OTHER THAN MULTIFAMILY ACCOMMODATIONS**

When a Customer wants to terminate liability for payment for service, the Customer shall give PG&E not less than two days notice and state the date on which the termination is to become effective. The Customer may be held responsible for all service furnished at the premises until two days after receipt of such notice by PG&E, or until the date of termination specified in the notice, whichever date is later.

**2. SERVICE TO MULTIFAMILY ACCOMMODATIONS**

When a Customer wants to terminate liability for payment for the service supplied to a multifamily accommodation and the termination may deprive residential tenants of service, the Customer shall give PG&E and the tenants notice at least 10 days prior to the date the Customer desires to terminate liability for payment for the service. The Customer may be held responsible for all service furnished at the premises until ten days after receipt of such notice by PG&E, or until the date of termination specified in the notice, whichever date is later.

**C. TERMINATION OF SERVICE FOR NONPAYMENT—WEEKENDS, HOLIDAYS AND EXTREME WEATHER FORECASTS.**

Service will not be terminated for nonpayment of bills or credit deposit requests on Saturdays, Sundays, legal holidays or when the offices of PG&E are closed to the public.<sup>1</sup>

(T)

Residential service shall not be disconnected when temperatures above 100 degrees or below 32 degrees are forecasted by PG&E based on a 72-hour look-ahead period, or for credit deposit requests.

<sup>1</sup> A customer may still be disconnected for non-payment if PG&E's customer service offices are closed to the public as long as the customer has access to PG&E in accordance with Public Utilities Code 708.3

(N)  
|  
(N)

(Continued)



**ELECTRIC RULE NO. 11**  
**DISCONTINUANCE AND RESTORATION OF SERVICE**

Sheet 1

If PG&E terminates or refuses to restore service to a customer or any other person for any of the reasons or upon any of the grounds stated herein, PG&E shall incur no liability whatsoever to said customer or person or to any other customers or persons.

**A. CUSTOMER REQUEST TO TERMINATE LIABILITY FOR PAYMENT FOR SERVICE**

**1. SERVICE TO OTHER THAN MULTIFAMILY ACCOMMODATIONS**

When a customer wants to terminate liability for payment for service, the customer shall give PG&E not less than two days notice and state the date on which the termination is to become effective. The customer may be held responsible for all service furnished at the premises until two days after receipt of such notice by PG&E, or until the date of termination specified in the notice, whichever date is later.

**2. SERVICE TO MULTIFAMILY ACCOMMODATIONS**

When a customer wants to terminate liability for payment for the service supplied to a multifamily accommodation and the termination may deprive residential tenants of service, the customer shall give PG&E and the tenants notice at least 10 days prior to the date the customer desires to terminate liability for payment for the service. The customer may be held responsible for all service furnished at the premises until ten days after receipt of such notice by PG&E, or until the date of termination specified in the notice, whichever date is later.

**B. TERMINATION OF SERVICE FOR NONPAYMENT—WEEKENDS, HOLIDAYS AND EXTREME WEATHER FORECASTS.**

Service will not be terminated for nonpayment of bills or credit deposit requests on Saturdays, Sundays, legal holidays or when the offices of PG&E are closed to the public.<sup>1</sup>

(T)

Residential service shall not be disconnected when temperatures above 100 degrees or below 32 degrees are forecasted by PG&E based on a 72-hour look-ahead period, or for credit deposit requests.

<sup>1</sup> A customer may still be disconnected for non-payment if PG&E's customer service offices are closed to the public as long as the customer has access to PG&E in accordance with Public Utilities Code 708.3.

(N)  
|  
(N)

(Continued)

**PG&E Gas and Electric  
Advice Submittal List  
General Order 96-B, Section IV**

AT&T  
Albion Power Company

Alta Power Group, LLC  
Anderson & Poole

Atlas ReFuel  
BART

Barkovich & Yap, Inc.  
California Cotton Ginners & Growers Assn  
California Energy Commission

California Hub for Energy Efficiency  
Financing

California Alternative Energy and  
Advanced Transportation Financing  
Authority  
California Public Utilities Commission  
Calpine

Cameron-Daniel, P.C.  
Casner, Steve  
Cenergy Power  
Center for Biological Diversity

Chevron Pipeline and Power  
City of Palo Alto

City of San Jose  
Clean Power Research  
Coast Economic Consulting  
Commercial Energy  
Crossborder Energy  
Crown Road Energy, LLC  
Davis Wright Tremaine LLP  
Day Carter Murphy

Dept of General Services  
Don Pickett & Associates, Inc.  
Douglass & Liddell

East Bay Community Energy Ellison  
Schneider & Harris LLP Energy  
Management Service  
Engineers and Scientists of California

GenOn Energy, Inc.  
Goodin, MacBride, Squeri, Schlotz &  
Ritchie

Green Power Institute  
Hanna & Morton  
ICF

IGS Energy  
International Power Technology  
Intestate Gas Services, Inc.  
Kelly Group  
Ken Bohn Consulting  
Keyes & Fox LLP  
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated  
Waste Management Task Force  
MRW & Associates  
Manatt Phelps Phillips  
Marin Energy Authority  
McKenzie & Associates

Modesto Irrigation District  
NLine Energy, Inc.  
NRG Solar

Office of Ratepayer Advocates  
OnGrid Solar  
Pacific Gas and Electric Company  
Peninsula Clean Energy

Pioneer Community Energy

Redwood Coast Energy Authority  
Regulatory & Cogeneration Service, Inc.  
SCD Energy Solutions  
San Diego Gas & Electric Company

SPURR  
San Francisco Water Power and Sewer  
Sempra Utilities

Sierra Telephone Company, Inc.  
Southern California Edison Company  
Southern California Gas Company  
Spark Energy  
Sun Light & Power  
Sunshine Design  
Tecogen, Inc.  
TerraVerde Renewable Partners  
Tiger Natural Gas, Inc.

TransCanada  
Utility Cost Management  
Utility Power Solutions  
Water and Energy Consulting Wellhead  
Electric Company  
Western Manufactured Housing  
Communities Association (WMA)  
Yep Energy