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April 1, 2021

**ADVICE 241-G/4460-E  
(U 338-E)**

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA  
ENERGY DIVISION

**SUBJECT:** Southern California Edison Company's Transition Plan for the Expiration of Emergency Customer Protections Related to the COVID-19 Pandemic

**PURPOSE**

SCE hereby submits this Tier 2 Advice Letter (AL) pursuant to Ordering Paragraph (OP) 5 of Resolution M-4849 (Resolution). The purpose of this AL is to provide the transition plan for the expiration of Emergency Customer Protections related to the COVID-19 pandemic. The transition plan is aimed to ease customers through a transition off the Emergency Customer Protections by proactively communicating with customers to enroll them in programs to manage their utility bills and informing them of the changes to programs in which they are already enrolled.

**BACKGROUND**

On March 4, 2020, Governor Newsom declared a State of Emergency related to the COVID-19 pandemic<sup>1</sup> and followed up on March 19, 2020 with an executive order for Californians to shelter in place except to meet essential needs.<sup>2</sup> In response, on April 16, 2020, the California Public Utilities Commission (Commission or CPUC) ratified Resolution M-4842, Emergency Authorization and Order Directing Utilities to Implement Emergency Customer Protections to Support California Customers During the COVID-19 Pandemic. Specifically, Resolution M-4842 ordered the utilities to submit Tier 2 advice letters describing all reasonable and necessary actions to implement the Emergency Customer Protections and set an end date for the Emergency Customer Protections as April 16, 2021.

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<sup>1</sup> <https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-help-state-prepare-for-broader-spread-of-covid-19/>.

<sup>2</sup> Executive Order N-33-20, available at <https://www.gov.ca.gov/2020/03/19/governor-gavin-newsom-issues-stay-at-home-order/>.

On May 1 and May 27, 2020, SCE submitted Advice 233-G/4205-E and 233-G-A/4205-E-A, respectively, to describe all reasonable and necessary actions to implement the Emergency Customer Protections for Residential and Small Business Customers during the COVID-19 pandemic. In addition, SCE requested establishment of the COVID-19 Pandemic Protections Memorandum Account (CPPMA) to track incremental costs associated with complying with Resolution M-4842. On February 11, 2021, the CPUC approved Resolution M-4849, which extended the Emergency Customer Protections to June 30, 2021 and ordered the creation of transition plans to facilitate a smooth transition for customers when the Emergency Customer Protections expire.<sup>3</sup>

In this AL, SCE complies with OP 5 of Resolution M-4849 by including: (1) a timeline of new start and resumed activities, (2) a marketing, education, and outreach (ME&O) strategy, (3) an explanation of the activities' timeline and ME&O strategy for compliance and safety, and (4) a progress tracking and reporting plan. The goal of this transition plan is to proactively engage customers on programs to manage their utility bills and inform customers of relevant changes to programs in which those customers are currently enrolled.

## **DISCUSSION**

### **I. Introduction**

#### **A. Current State of SCE's Emergency Customer Protections**

SCE instituted several customer protections for its residential and Small Business Customers in response to the COVID-19 pandemic.<sup>4</sup> SCE suspended disconnections for nonpayment, waived all Late Payment Charges (LPC), and eliminated deposit requirements for both establishment and re-establishment of service. In addition,

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

<sup>4</sup> As defined in SCE's Rule 1, Definitions, Small Business Customer: For purposes of assessing deposits and effectuating certain rebills, a Small Business Customer is a non-residential customer with either a demand of 20 kW or less during the previous calendar year, or an annual usage of 40,000 kWh or less during the previous calendar year. For customers with more than one service account, SCE will aggregate monthly usage data over that calendar year and will aggregate the maximum peak annual demand for each service account. This definition of Small Business Customer excludes customers on rate schedules for fixed usage and unmetered service (Schedules LS-1, LS-2, DWL, OL-1, TC-1, Wi-Fi-1, and WTR). Per Decision 10-10-032 and Decision 10-11-037, to be treated as a "Small Business Customer" under this definition, non-residential customers who do not meet the above-described electric demand or usage criteria, or for whom SCE lacks 12 months of data from the previous calendar year, may self-certify as a "Micro-Business" under California Government Code 14837 by submitting SCE Form 14-904, Southern California Edison Company Micro-Business Self-Certification Affidavit.

customers are eligible for payment arrangements of 12 months, with the possibility for longer arrangements.

For residential customers, SCE also temporarily suspended the standard and high-usage post-enrollment verifications for all customers in the California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA) programs. Similarly, SCE temporarily waived the requirement for a qualified medical professional certification signature<sup>5</sup> for the Medical Baseline Allowance Application at the time of enrollment and deferred Medical Baseline renewals so that customers would not be removed from the program while the Emergency Customer Protections are in effect.

SCE also partnered with SCE's Energy Assistance Fund (EAF) administrator to provide up to an additional \$100 in one-time bill payment assistance to affected income-eligible customers in SCE's service territory.<sup>6</sup> In addition, SCE continued to deploy contractors for its Energy Savings Assistance (ESA) program while following state and local government safety guidelines. Finally, residential customer reconnection fees were eliminated in accordance with Decision (D.)20-06-003.<sup>7</sup>

For SCE's small and medium business customers who have elected to curtail routine business activities and/or closed business operations during the COVID-19 pandemic, SCE temporarily waived the standard \$30 service connection charge when the customer elected to re-start their service.<sup>8</sup>

To notify customers of these Emergency Customer Protections, SCE conducted a significant outreach campaign via SCE.com, outbound e-mails, direct mail, digital and radio advertisement, fact sheets distributed by Community Based Organizations (CBO) and food banks, and customer bill inserts. In accordance with the requirements in D.20-03-004, SCE provided the Emergency Customer Protections information in English, Spanish, Chinese (i.e., Cantonese, Mandarin, and other Chinese languages), Tagalog, Vietnamese, and Korean, as well as languages prevalent within SCE's service territory (i.e., languages spoken by indigenous communities). As a result, SCE's fact sheet containing the customer protections information is available in a total of 15 languages on SCE.com.<sup>9</sup>

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<sup>5</sup> Consistent with Senate Bill (SB) 598 and SB 1338, SCE accepts certification signatures from Medical Doctors (MD), Doctors of Osteopathy (DO), Physician Assistants (PA), or Nurse Practitioners (NP).

<sup>6</sup> The list of EAF agencies is available at <https://www.sce.com/residential/assistance/energy-assistance-fund>.

<sup>7</sup> D.20-06-003, OP 16.

<sup>8</sup> The Non-Residential Service Connection Charge will not apply to accounts with monthly Maximum Demands below 200 kW.

<sup>9</sup> <https://www.sce.com/safety/coronavirus>.

## **B. Transition Objectives**

Pursuant to Resolution M-4849, the Emergency Customer Protections are expected to conclude on June 30, 2021. Due to ongoing system upgrades necessary for SCE to begin its collection activities, however, SCE currently estimates it will not begin collection activities until August 1, 2021. Prior to the start of collection activities, SCE intends to emphasize customer outreach for those customers most likely to be impacted by collection activities, namely, customers who have outstanding arrearage balances. The outreach to customers will begin at least 60 days (estimated to be no later than June 2, 2021) prior to the start of collection activities.

While all customers will receive notification on the start of collection activities via the “Things you should know” section of the customer bill, SCE intends to develop additional customized communications targeting specific customers with outstanding arrearages for general awareness. SCE proposes to develop distinct, customized communications for: (1) residential customers and (2) Small Business Customers. As the options available to these segmented customer groups post-Emergency Customer Protections will differ slightly, the customized communications will allow for customers to quickly obtain the relevant information for their specific situation.

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

### **A. Objective of the ME&O Communication Plan**

The objective of the customer communication plan is to continue to raise awareness and inform customers about the existence of the available customer protections while also informing them of their limited duration and anticipated expiration on June 30, 2021. SCE proposes to begin its outreach to customers at least 60 calendar days before the June 30 expiration date.

### **B. ME&O Strategy**

SCE’s ME&O strategy includes a combination of tactics designed to reach all customers while directly communicating to those customers who are (1) in arrears,<sup>10</sup> (2) AMP eligible or income-qualified, (3) residential, or (4) small businesses. These direct customer communications will raise awareness about the Emergency Customer Protections ending on June 30, 2021, while also informing them of other programs and assistance options that may be beneficial to them. Tactics will include but are not limited to on-bill messaging, direct mail when appropriate, email, CBO engagement in local communities, targeted social media, and messaging on web pages across SCE’s website.

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<sup>10</sup> SCE proposes to target residential and Small Business Customers that are more than 60 days in arrears.

SCE's awareness campaign is intended to reach customers across SCE's service area prior to the expiration of the Emergency Customer Protections. Customer messaging in this awareness campaign will articulate that SCE understands customer hardships may continue for a period beyond the expiration of Emergency Customer Protections. The messaging in the awareness campaign will communicate that SCE recognizes customers still need help and that SCE is offering a variety of assistance options that customers can use. Specifically, the communication messaging objectives are (1) to educate customers about the Emergency Customer Protections ending and the implications for the customer and (2) to educate customers about available programs and offerings available. Recognizing that customers are likely to receive a multitude of information, SCE has contracted with a third-party to balance the need for clear, concise communication while still maintaining the ability to communicate the numerous customer assistance programs that are available to support customers in reducing their bills or enter into payment plans.

### **C. Implementation and Community Outreach**

SCE will take steps to raise awareness and engage affected customers on the crucial customer protections that are available. To accomplish this, SCE will use a variety of forums, tactics, and channels to reach customers to inform them about these protections and their duration as described further in the subsections below. The following list of assistance programs available to customers includes programs administered by SCE as well as programs administered by outside agencies:<sup>11</sup>.

- California Alternate Rates for Energy (CARE);
- Family Electric Rate Assistance Program (FERA);
- Medical Baseline (MBL);
- Low-Income Home Energy Assistance Program (LIHEAP);
- Energy Savings Assistance (ESA);
- 12-month payment plans;
- Arrearage Management Plan (AMP); and
- Energy Assistance Fund (EAF).

#### **1. Webpages and Paid Search**

SCE will add the expiration date of June 30, 2021 and will continue to add information on customer protections on SCE.com webpages including COVID-19 response, bill assistance, and disaster support at the following addresses:

- SCE.com/Safety/Coronavirus;
- SCE.com/findsupport;
- SCE.com/BillHelp; and

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<sup>11</sup> Small Business Customers are currently not eligible for any of the programs with the exception of 12-month payment plans.

- [SCE.com/DisasterSupport](https://www.sce.com/DisasterSupport).

SCE has engaged its agency partners to develop updates to its webpages that aim to (1) teach customers what programs are available and how to enroll, (2) help the customer to choose which one may be the best fit, and (3) provide access to easily enroll and confirmation once enrollment is complete. SCE will use the following questions to direct customers to programs which may be the most beneficial for the customer's specific situation:

- What if I can't afford my full monthly payment?
- How can I save on energy for my household?
- What if I can't pay my bill on time?
- What if I just need help with one payment?

Also included will be a Frequently Asked Questions (FAQ) that will provide customers additional information as well as the phone number to call for additional support.

Adding to the list of additional non-SCE administered assistance programs,<sup>12</sup> SCE is updating its website to include information for the newly created California COVID-19 Rent Relief Program.<sup>13</sup> As additional federal and state programs are made available to assist customers with arrears, SCE will add the link to those programs on its website.

Furthermore, SCE will utilize paid search marketing to advertise within the sponsored listings of a search engine. This will help to drive customers that may be seeking help to the appropriate SCE websites that describes the availability of customer assistance programs.

## **2. Outbound Emails and Social Retargeting**

SCE intends to utilize emails to initiate customer outreach regarding the end of Emergency Customer Protections. For customers who opt-in to receive promotional marketing communications electronically, SCE has engaged its agency partners to develop a concise email message that is simple to understand and can be customized to the customer's needs depending on which programs that customer is not already enrolled. SCE will begin its email notifications in late April and will also send a follow-up reminder email three days later if the original email remains unopened.

Recognizing the influx of information that a customer may receive from various entities; SCE's emails will focus on communicating relevant information about the expiration of Emergency Customer Protections and which programs customers may still be eligible

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<sup>12</sup> <https://www.sce.com/residential/assistance> currently includes information on LIHEAP, California LifeLine, EveryoneOn.org, Social Security Administration, 2-1-1.org, and GridSolar.

<sup>13</sup> <https://www.hcd.ca.gov/grants-funding/active-funding/erap.shtml>.

for enrollment. SCE may also elect to send transactional emails<sup>14</sup> that do not require opt-in. SCE would utilize in-house resources to deploy the transactional email.

For customers who use the same email address to access SCE and social media, SCE will push an ad to the customer's feed in Facebook and Instagram regarding the ability to get help with unpaid bills and the availability of assistance programs.

### **3. Bill Onsert and Bill Messaging**

SCE will continue to include COVID-19 customer protections messaging and the link to the [SCE.com/Safety/Coronavirus](https://www.sce.com/Safety/Coronavirus) webpage on all residential customer bills using "on-bill" (onsert) messaging. In 2020, SCE added bill onserts to all customer bills in May, July, and October to notify customers that SCE had suspended service disconnections for non-payment, waived late fees, and would only continue critical work needed to protect public safety and reduce the risk of wildfire.

SCE anticipates this proactive awareness messaging about the expiration of the customer protections will be implemented prior to June 30 using SCE's current communication cadence for bill onsert messaging. SCE will use internal marketing resources to develop high-level messaging for the bill onsert that will be sent to all SCE customers. As such, no incremental costs are anticipated to be incurred for bill onsert messaging.

SCE will also use the "Things you should know" section on residential customer bills to continue communicating information regarding the disconnection moratorium, waiving of late fees, and the number to SCE's Customer Contact Center to seek financial assistance. In this communication, SCE will continue to inform customers that financial programs such as CARE, FERA, and the ESA program are available for income-qualified customers. For customers who were financially impacted by COVID-19, SCE will also continue to include relevant information at its [SCE.com/billhelp](https://www.sce.com/billhelp) site to provide more ways for the customers to get financial assistance.

### **4. Direct Mail**

Similar to the outbound emails, SCE intends to use utilize direct mail to provide residential and Small Business Customers who are more than 60 days in arrears with a communication regarding the June 30, 2021 end of Emergency Customer Protections and the list of available assistance programs. However, unlike the unique customization to the individual customer in the email, the direct mail communication will only vary depending on whether the customer is a residential or Small Business Customer. As of mid-March 2021, SCE estimates that approximately 40,000 residential and Small Business Customers will receive a direct mail communication.<sup>15</sup> Due to the large

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<sup>14</sup> Transactional emails are automated responses that are triggered by an event such as a confirmation that a payment has been received.

<sup>15</sup> Based on residential and Small Business Customers more than 60 days in arrears.

number of potential customers receiving the direct mailer and to provide the best customer experience, SCE intends to allocate the mailing dates over the first two weeks of May. This will help mitigate potential delays in call times that can be frustrating to customers during those times when the call center may have high call volumes.

SCE intends to provide a brochure that contains the same lead questions on SCE's webpage. In each section of the brochure, the customer would be notified of programs that help their specific situation. The brochure will include the relevant webpages as well as the contact phone number for the customer to receive additional information or enroll in the programs. Also included will be information regarding how to recognize scams that may be targeting utility customers. Finally, the envelope for the brochure will be customized to stand apart from other mailings and will feature the words "Keep Getting the Financial Assistance You Need" so that customers are aware of the contents.

SCE will also be sending a separate letter to customers who are eligible for AMP, which will also be sent in staggered batches to provide customers with the best customer experience when calling into the call center. The letter will notify the customer of eligibility requirements to enroll in AMP, basic information regarding the program, and include both the website as well as the phone number to be used for enrollment or to receive additional information. SCE commits to sending all AMP eligible customers this letter prior to the end of Emergency Customer Protections.

## **5. Community Based Organizations (CBO) Engagement**

SCE has established relationships with nearly 1,600 non-profit CBOs and faith-based organizations (FBOs) across its entire service territory to help increase awareness and educate customers on rates and other income assistance programs such as CARE/FERA and Medical Baseline. SCE actively communicates with these CBOs/FBOs and is engaged with those organizations on both a quarterly and as-needed basis. SCE will continue to work with these organizations to disseminate information on customer protections. The CBOs and FBOs also regularly exchange and share communications on programs and service through social media, e-newsletters, and direct stakeholder engagement efforts like digital webinars. SCE intends to provide its CBOs and FBOs with factsheets to help these organizations understand what the customer may see and to increase their awareness of the changes. In parallel, to providing information about the expiration of the customer protections, SCE will also provide CBOs with information on how customers can prevent from falling victim of scam/fraud.

These 1,600+ CBOs have been categorized into three tiers based on their interest in engaging with SCE and frequency with which they are willing to share our messaging and communications with their constituents. SCE communicates with the vast majority of CBOs, approximately 1,400, through quarterly newsletters, but may engage with them more frequently if a particular need arises such as in the case of the COVID-19



pandemic to inform them of SCE's customer protections and assistance available to customers. These are known as Tier 3 CBOs.

A second tier, Tier 2, consists of approximately 200 CBOs and these CBOs have expressed interest in more frequent communications and dialogue by returning to SCE a business reply card and theoretically "raising their hand."

To create even more productive alliances with CBOs, SCE launched a pay-for-performance model in 2019 and contracted 30 CBOs for ongoing incentivized partnerships. These are known as Tier 1 CBOs. These CBOs were selected through a Request for Proposal (RFP). The RFP was designed to select a total of 30 CBOs that have a strong reach within diverse communities and demonstrate a strong ability to partner with SCE to help increase awareness and educate constituents about assistance programs and time-of-use rates.

In the Summer of 2020, this model was duplicated to further engage our CBO partners to help educate constituents around wildfire and how to be prepared in the event of a disaster or a public safety power shutoff (PSPS) activation within their communities. To date, SCE has contracted with 50 CBOs that support wildfire mitigation. CBOs began their outreach and engagement efforts in November 2020.

Together, the CBOs and SCE share information about programs such as rate options that can help customers to reduce their bills, including programs such as CARE/FERA, Medical Baseline Allowance program, Wildfire and Safety Preparedness. CBOs also regularly exchange and share communications on programs and services through social media, newsletters, e-blast, blog post, and direct stake holder engagement efforts like digital webinars.

SCE recognizes that CBOs present a unique opportunity to reach customers that are in hard-to-reach segments. SCE intends to communicate the end of Emergency Customer Protections and the list of available programs to its Tier 1 and Tier 2 CBO partners. Unfortunately, SCE is unable to add additional CBOs to its Tier 1 list without first engaging in another RFP. Recognizing the feedback from stakeholders that CBOs should be compensated for their work, SCE will evaluate the need to increase the number of Tier 1 CBOs and start a new round of RFPs as appropriate.

## **6. Customer Contact Center Communications**

Customer Contact Center (CCC) representatives are currently available to speak with and provide information to customers seeking financial assistance. When SCE resumes its collections activities, consistent with D.20-06-003, CCC representatives will offer eligible customers enrollment in all applicable benefit programs administered by the utility when a customer call is received regarding arrears or disconnections.<sup>16</sup> Also

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<sup>16</sup> D.20-06-003, OP 1(c).

for these calls after collections activities resume, the CCC representatives will inquire if the customer is interested in hearing about applicable benefit programs.<sup>17</sup> In addition, should there be a need for outbound calls or text messages to specific customers, SCE's CCC could reach out directly to the identified customers.

SCE expects that customer call volume will increase as a result of SCE's Customer Service Re-Platform (CSRP) implementation as well as the end of Emergency Customer Protections. Normally, SCE has its own representatives in California and a third party in Texas handling the customer calls. Recognizing that additional staff may be needed, SCE has contracted with an additional third-party vendor to better handle the expected additional calls. This need is anticipated despite the staggering of communications to reduce call-volume wait time for customers and will act as an overflow opportunity should it be needed.

## **7. Energy Savings Assistance (ESA) Contractors**

SCE recognizes that its ESA contractors can be an avenue for additional customer communication. Due to concerns with customer data privacy, SCE is unable to directly provide customer arrearage information to the ESA contractors without the expressed consent of the customer. However, SCE will help ESA contractors target those customers who are in arrears by providing information regarding which customers should be prioritized. In addition, SCE will provide ESA contractors with the same outreach materials that SCE intends to mail to customers. This will balance the ability to provide outreach regarding the availability of assistance programs with the fact that ESA contractors may not necessarily be the subject matter expert and may not be able to answer questions for all the various bill reduction support programs.

### **D. Multi-Language Support**

SCE currently provides the customer protections information in accordance with the language requirements outlined in D.20-03-004: English, Spanish, Chinese (including Cantonese, Mandarin, and other Chinese languages), Tagalog, Vietnamese and Korean, as well as languages "prevalent" within SCE's service territory. SCE also included languages spoken by indigenous communities that occupy significant roles in California's agricultural economy regardless of prevalence. SCE also voluntarily provided its Customer Protections Fact Sheet in nine additional languages<sup>18</sup> on its website.<sup>19</sup> To communicate the end of Emergency Customer Protections, SCE will update the fact sheets for a total of 19 languages to reflect the June 30, 2021 end

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<sup>17</sup> *Id.*

<sup>18</sup> The additional languages supported are Arabic, Armenian, Farsi, French, German, Japanese, Khmer, Punjabi, and Russian.

<sup>19</sup> <https://www.sce.com/safety/coronavirus>.

date.<sup>20</sup> SCE also has an agreement with a CBO that works with the indigenous community to provide verbal assistance in three additional indigenous languages.<sup>21</sup>

For all other communications, SCE will continue to maintain its current production workflows for the six core languages (English, Spanish, Chinese, Tagalog, Vietnamese and Korean), which are effective in reaching approximately 95 percent of SCE's customer base.

### **III. Resumed Activities Timeline**

#### **A. Timing for Start of Collection-Related Activities**

While the Emergency Customer Protections period is currently estimated to expire on June 30, 2021,<sup>22</sup> SCE is not planning to resume certain collection activities until Monday, August 2, 2021. Currently, SCE is in transition for its Customer Service Re-Platform (CSRП) implementation,<sup>23</sup> which is expected to "go live" in early April 2021. The transition will be followed by a stabilization period, which will be focused on defect correction and other stabilization needs. The objective of the stabilization is to reduce risk of potential customer impacts and billing system issues. Once SCE confirms that the new system is stable, SCE will begin making additional system adjustments such as necessary logic to include the additional customer protections from D.20-06-003. SCE estimates these system adjustments will be completed by August 2, 2021, but may be delayed due to unforeseen circumstances such as delays to the additional system adjustments.

The activities that are expected to begin on July 1, 2021 include collection of the service connection charge for Small Business Customers, resumption of Late Payment Charges for Residential and Small Business Customers, and the commencement of verifications and re-certifications for CARE, FERA, and Medical Baseline customers. In addition, SCE will also discontinue the temporary increased funding levels in the EAF to allow the limited funds to serve a greater number of customers.

As discussed in the previous section, SCE will begin its marketing and outreach communications to customers at least 60 days before June 30, 2021.

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<sup>20</sup> Besides English, SCE will also provide fact sheets in Arabic, Armenian, Chinese (Mandarin), Chinese (Cantonese), Farsi, French, German, Japanese, Khmer, Korean, Punjabi, Russian, Spanish, Tagalog, Vietnamese, Portuguese, Hindi, Hmong, and Thai.

<sup>21</sup> Working with the Mixteco Indigena Community Organizing Project (MICOP), the additional indigenous languages include Mixteco, Zapoteco, and Purapecha.

<sup>22</sup> Resolution M-4849, OP 1.

<sup>23</sup> CSRП is SCE's upgrade for its legacy customer relationship and billing systems.

**B. Resuming Overdue Notices, Final Call Notices, Late Payment Charges, and Disconnections for Residential Customers**

As discussed above, SCE currently expects to initiate collection activities for residential customers beginning August 2, 2021. However, late payment charges for residential customers will resume on July 1, 2021. Table 1 outlines the earliest date for each of the new activities. As illustrated in Table 1, the earliest possible date a residential customer could be disconnected for nonpayment would be September 7. This effectively results in an additional 69 days (June 30 to September 7) that SCE residential customers are under a disconnection moratorium, adding an additional layer of time for the most payment-delinquent customers. Additionally, D.20-06-003 provides additional protections that may further delay disconnections for nonpayment for some customers. For example, should the customer contact SCE regarding bill payment activity prior to being disconnected for nonpayment, the customer would be offered two billing cycles to enroll in all applicable benefit programs as well as a 12-month payment plan.<sup>24</sup> If a customer enters a 12-month payment plan and is current on both monthly bills and the 12-month payment plan, the customer would not be disconnected.<sup>25</sup> In addition, income-qualified customers with \$500 or more in arrears could also be eligible for AMP.

**Table 1: Estimated *Earliest Possible Date* for Collection Activities (Residential)**

Activity	Earliest Possible Date
Start of collection activities	August 2, 2021
Earliest date overdue notices are mailed	August 3, 2021
Earliest date final call notices are mailed	August 24, 2021
Earliest a customer can be disconnected for non-payment	September 7, 2021

As previously outlined in SCE’s reply comments to Resolution M-4849,<sup>26</sup> it is operationally infeasible for SCE to conduct a massive disconnection event that is equal to its annual residential disconnection cap in a short timeframe. Prior to the implementation of Emergency Customer Protections, SCE did not automatically disconnect all customers that were subject to disconnection on any given day. The actual number of customers that could be disconnected was based on operational limitations such as the expected number of calls received by SCE’s CCC.

<sup>24</sup> D.20-06-003, OPs 1(c) and 1(d).

<sup>25</sup> *Id.*, OP 1(d).

<sup>26</sup> SCE Reply Comments to Draft Resolution M-4849, p. 4.

To confirm that SCE’s new Customer Service system is operating correctly for collection activities, SCE intends to further limit the number of customers that are ultimately subject to disconnection by restricting the number of overdue and final call notices during the first three months when collections activities resume (August through October).<sup>27</sup> Limiting the number of customers that are ultimately subject to disconnection simplifies the identification and correction of any potential issues that may arise. Historically, approximately 50 percent of customers who receive overdue notices do not take corrective action and receive a final call notice. Of those that receive a final call notice, approximately 8 percent take no corrective action and are disconnected. For residential customers, final call notices are sent 18 calendar days after the overdue notices and disconnection can occur 12 days after the final call notice.<sup>28</sup>

After November 2, 2021, SCE will no longer limit the number of overdue notices being sent daily to residential customers and will manage disconnections based on the disconnection cap and the volume of daily calls that can be handed by SCE’s CCC. Table 2 reflects the planned reinstatement of the overdue and final call notices.

**Table 2: Proposed Reinstatement for Overdue and Final Call Notices for Residential Customers**

<b>Date</b>	<b>Daily Number of Overdue Notices (OD)</b>	<b>Expected Number of Final Call (FC) Notices (18 calendar days after OD)</b>	<b>Expected Number of Disconnections (12 calendar days after FC)</b>
August 3, 2021	500	250	20
September 21, 2021	1,000	500	40
October 5, 2021	5,000	2,500	200
October 19, 2021	10,000	5,000	400

<sup>27</sup> While customers will still receive the bill with the overdue notice language, not all such bills will progress a customer down the collections path and result in a Final Call notice or subject the customer to disconnection if no payment is made. As an illustrative example, on August 3, SCE may send tens of thousands of residential customer bills with the overdue notice language embedded in the bill, but only 500 of those customers would receive a Final Call notice if no payment is made.

<sup>28</sup> SCE does not mail overdue or final call notices on Sundays or Mondays. Any notices that normally would be sent on those days are diverted to the following Tuesday.

November 2, 2021	No longer limited	No longer limited	Continues to be limited by operational constraints
<i>Formula</i>	<i>A</i>	$B=A*0.50$	$C=B*0.08$

### C. Residential Customer Payment Arrangements

There is no change to the length of available payment arrangements for residential customers because all residential customers will be offered payment arrangements for 12-months prior to disconnection.<sup>29</sup> The customer would be permitted to select a shorter payment plan. If the customer fails to keep this payment arrangement, however, SCE may require a down payment to be able to participate in subsequent payment arrangements. This practice precludes the “chaining” of payment plans each month into an ever-growing arrears balance.

### D. Resuming Overdue Notices, Final Call Notices, Late Payment Charges, and Disconnections for Small Business Customers

As discussed above, SCE currently expects to lift its collections freeze and initiate collection activities for Small Business Customers beginning August 2, 2021. However, late payment charges will resume on July 1, 2021. Table 3 outlines the earliest date for each of the new activities. As illustrated in Table 3, the earliest possible date a Small Business Customer could be disconnected for nonpayment would be August 20. This effectively results in an additional 51 days (June 30 to August 20) that Small Business Customers are under a disconnection moratorium. Small Business Customers differ from residential customers in that there is a shorter period of time before a final call notice is sent, which leads to August 20 being the earliest date that a Small Business Customer could be disconnected for non-payment.

**Table 3: Estimated *Earliest Possible Date* for Collection Activities (Small Business Customer)**

<b>Activity</b>	<b>Earliest Possible Date</b>
Start of collection activities	August 2, 2021
Earliest date overdue notices are mailed	August 3, 2021
Earliest date final call notices are mailed	August 10, 2021

<sup>29</sup> D.20-06-003, OP 1(d).

Earliest a customer can be disconnected for non-payment	August 20, 2021
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SCE also intends to limit the number of overdue notices sent to Small Business Customers and thereby the number of final call notices and disconnections. Historically, approximately 21 percent of Small Business Customers who receive overdue notices do not take corrective action and receive a final call notice. Of those that receive a final call notice, approximately 13 percent still take no corrective action and are disconnected. For Small Business Customers, final call notices are sent 5 calendar days after the overdue notices and disconnection can occur 10 days after the final call notice.<sup>30</sup>

After October 5, 2021, SCE will no longer limit the number of overdue notices being sent daily for Small Business Customers. Small Business Customer disconnections have historically not been limited daily due to the low number that subject to disconnection on any given day. Table 4 reflects the planned reinstatement of the overdue and final call notices.

**Table 4: Proposed Reinstatement for Overdue and Final Call Notices for Small Business Customers**

Date	Daily Number of Overdue Notices (OD)	Expected Number of Final Call (FC) Notices (5 calendar days after OD)	Expected Number of Disconnections (10 calendar days after FC)
August 3, 2021	500	105	14
September 21, 20 1	1,000	210	27
October 5, 2021	No longer limited	No longer limited	No longer limited
<i>Formula</i>	<i>A</i>	$B=A*0.21$	$C=B*0.13$

### **E. Start of Deposit Requirements for Small Business Customers**

On July 1, 2021, SCE proposes to reinstate its deposit requirements for eligible Small Business Customers during the move-in process. For re-establishment of service deposits, SCE has identified that a system update is necessary before reinitiating collection of these deposits. SCE proposes to not collect Small Business Customer re-

<sup>30</sup> SCE does not mail notices on Sundays or Mondays. Any notices that normally would be sent on those days are instead diverted to the following Tuesday.

establishment deposits until the system can be updated. The collection of re-establishment deposits would begin no earlier than August 1, 2021. There is no impact for residential customers as all residential deposits are prohibited pursuant to D.20-06-003.<sup>31</sup>

#### **F. Payment Arrangements for Small Business Customers**

Similar to the other Investor Owned Utilities (IOUs), SCE proposes to continue to allow Small Business Customers to enroll in payment arrangements of up to 12-months once Emergency Customer Protections end. Small Business Customers are not required to make a down payment to enroll in a payment plan. If the customer fails to maintain participation in the payment arrangement, however, SCE may require a down payment to enter into a new payment arrangement. This policy precludes the “chaining” of payment plans each month into an ever-growing arrears balance.

#### **G. Resuming Service Connection Charge for Small Business Customers**

In Advice 233-G/4205-E, SCE temporarily and voluntarily waived the standard \$30 service connection charge when a Small Business Customer elected to curtail routine business activities and/or closed business operations during the COVID-19 pandemic.<sup>32</sup> Starting on July 1, 2021, SCE will resume collection of the \$30 service connection charge. There is no impact to residential customers as residential reconnection fees have been eliminated pursuant to D.20-06-003.<sup>33</sup>

#### **H. Resuming Eligibility Verifications for CARE, FERA, and MBL Customers**

Starting July 1, 2021, SCE will resume verification and re-certification activity for the CARE, FERA, and MBL programs. For any customer who enrolled or reached their re-certification anniversary during the Emergency Customer Protections period (i.e., March 4, 2020 to June 30, 2021), SCE automatically re-certified the customer for the standard period of two years or four years depending on the program.<sup>34</sup> SCE will not require these customers to re-certify again until their standard re-certification date. Table 5 provides illustrative examples of future re-certification dates depending on when the customer initially enrolled in the program and whether the customer was automatically re-certified during the Emergency Customer Protection period. Any customer who is requested to re-certify is given 90 days to provide the requested documentation. Should a customer decline to re-certify or should a customer provide insufficient documentation, the customer would be subject to removal from CARE, FERA, or MBL.

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<sup>31</sup> D.20-06-003, OP 8 and 9.

<sup>32</sup> Advice 233-G/4205-E, p. 10.

<sup>33</sup> D.20-06-003, OP 16.

<sup>34</sup> CARE, FERA, and MBL customers are normally required to re-certify every two years. Select CARE customers (those on fixed income) are only required to re-certify every four years.



**Table 5: Illustrative Example of Dates for Customer Re-Certification**

Enrollment Date	Automatic Re-certification During Emergency Customer Protections?	Next Re-Certification Date*
August 1, 2018	Yes	August 1, 2022
August 1, 2019	No	August 1, 2021
August 1, 2020	No, was a new enrollment	August 1, 2022

\* For ease, example assumes standard two-year re-certification.

In addition, prior to the start of verification activity for MBL, SCE will have implemented a procedure to allow qualified medical professionals to e-sign applications for the program pursuant to D.20-06-003.<sup>35</sup> For CARE customers, SCE will also re-establish the High Usage Verification for customers who exceed the approved threshold.

**I. Update to SCE Energy Assistance Fund Direct Payment Assistance**

The EAF is SCE’s charitable, non-profit organization that offers direct payment assistance to those in need, including seniors on fixed income, young families with children, and veterans. EAF is comprised of shareholder, employee, and customer donations. In response to the COVID-19 pandemic, SCE temporarily increased the maximum EAF amount to \$200 (up from \$100) and \$300 for all electric households (up from \$200).<sup>36</sup> In 2020, over \$1.5 million in bill assistance was distributed to the more than 10,000 households that participated in the EAF program. Beginning on July 1, 2021, the additional \$100 for bill payment assistance will no longer be made available to customers. This will enable the EAF funds to support more customers, although at lower assistance amounts.

**J. Energy Savings Assistance (ESA)**

SCE’s ESA Program is designed to help income-qualified customers conserve energy and save money. Income-qualified customers may be eligible to receive energy-efficient appliances at no charge. As of June 1, 2020, SCE lifted its work restrictions for ESA program contractors. Contractors have been advised to proceed safely and cautiously and adhere to SCE’s safety protocols consistent with state and local government guidelines. As this activity is already ongoing, there is no change resulting from the end of Emergency Customer Protections. To help reduce potential exposures, SCE will continue to offer virtual program enrollment and assessment to customers where feasible. As mentioned in the previous customer outreach section, SCE intends

<sup>35</sup> D.20-06-003, OP 36.

<sup>36</sup> SCE Advice 233-G/4205-E, p. 6.

to provide its ESA contractors with outreach materials that can be given to customers who may have questions regarding the availability of assistance programs. In addition, SCE intends to help the ESA contractors prioritize those customers who are in arrears.

#### **IV. Compliance and Safety Focus**

SCE will continue to monitor state and local COVID-19 health orders and governmental directives, and may, in consultation with Energy Division, postpone implementation of provisions of this Plan as necessary to ensure the safety of SCE employees, customers and the general public.

##### **A. Vulnerable Customer Safety**

Prior to the disconnection of any customer account that is classified as medical baseline, disabled, senior citizen, or critical care, SCE performs in-person visits at time of disconnection. For customers who are classified as both medical baseline and critical care, SCE does not disconnect on first contact with the customer. If contact is made, the Field Service Representative (FSR) will refer the customer to the Customer Contact Center to make payment arrangements. If no customer contact is made on the first visit, FSRs will extend the account for an additional 48-hours and leave a notification at the customer's home.

On the second attempt, if a customer is home, the FSR will offer to help the customer arrange for payment. If no customer contact is made on the second attempt, a service disconnection can only occur if (1) the FSR deems it safe to do so (*e.g.*, safe access, no issues with customer panel/meter), (2) there is no safety risk to the customer or public, and (3) supervisor approval has been granted.

##### **B. Compliance with Additional Residential Customer Safeguards for Disconnections**

SCE will comply with the additional residential disconnection safeguards contained in D.20-06-003. Specifically, residential customers shall not be disconnected for non-payment:

- Until SCE offers to enroll eligible customers in all applicable benefit programs administered by SCE;<sup>37</sup>
- Until SCE offers a 12-month payment plan, or if the customer is on a 12-month payment plan and is current on both monthly bills and the 12-month payment plan;<sup>38</sup>
- If the customer currently has a Low-Income Home Energy Assistance Program

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<sup>37</sup> D.20-06-003, OP 1(c).

<sup>38</sup> *Id.*, OP 1(d).

- (LIHEAP) pledge pending;<sup>39</sup> and
- When temperatures above 100 degrees or below 32 degrees are forecasted based on a 72-hour look-ahead period.<sup>40</sup>

While the IOUs are not required to make an affirmative inquiry of every residential household as to whether they are enrolled in all applicable benefit programs, each utility has a duty to inquire if the customer is interested in hearing about applicable benefit programs if the utility has discussions with a residential customer prior to disconnection.<sup>41</sup> After being made aware of the applicable benefit programs, residential customers are then given two billing cycles to enroll in the program.<sup>42</sup> In addition to these programs, certain CARE and FERA customers are also eligible for arrearage forgiveness through the AMP. SCE began enrolling customers in AMP on February 1, 2021.<sup>43</sup>

## **V. Coordination and Feedback from Other Organizations**

### **A. Community Choice Aggregators (CCA) Coordination**

Pursuant to Resolution M-4849, SCE will share customer education materials with the CCAs in advance of their distribution to customers.<sup>44</sup> SCE has also proactively partnered with the CCAs in its service territory by providing the CCAs an opportunity to review the marketing and outreach strategy prior to the submittal of the draft AL to the Low-Income Oversight Board and met with the CCAs during the first week of March to solicit feedback. In that draft, SCE shared its overall approach towards outreach with its CCAs in advance of the draft being provided to the Low-Income Oversight Board and did not receive any feedback regarding the overall strategy.

### **B. Low-Income Oversight Board (LIOB) Feedback**

As directed by Resolution M-4849, SCE submitted a draft of this AL on February 25, 2021 to the LIOB and presented an overview of the contents at the March 11, 2021 LIOB quarterly meeting. On March 24, 2021, SCE received an email copy of the letter from LIOB to the Commission regarding its recommendations for the transition plans.<sup>45</sup> SCE appreciates the thoughtfulness of the LIOB's recommendations. Where feasible, SCE has incorporated the recommendations or has included the recommendations in existing SCE practices. However, there are some recommendations that are beyond the

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<sup>39</sup> *Id.*, OP 1(e).

<sup>40</sup> *Id.*, OP 1(f).

<sup>41</sup> *Id.*, OP 1(c).

<sup>42</sup> *Id.*

<sup>43</sup> Resolution E-5114.

<sup>44</sup> Resolution M-4849, p. 13.

<sup>45</sup> Sent by Gillian Weaver on behalf of the LIOB to the service list for R.15-03-010, R.18-07-006, and R.18-07-005.

scope of this transition plan and will require further research, coordination, and development before a solution can be developed.

<b>LIOB Recommendation</b>	<b>SCE Response</b>	<b>Transition Plan Section (if applicable)</b>
<p><b>1. Extreme Climate Protections</b></p> <p>a. Include a 7-day look ahead period through December 31, 2021</p> <p>b. Develop an “emergency restoration policy” that would temporarily restore service to any household already disconnected when an extreme climate event is predicted</p>	<p>a. SCE uses a rolling 72-hour look-ahead that would capture an extreme weather event. For example, on Monday, SCE is forecasting for Tuesday, Wednesday, and Thursday. On Tuesday, SCE is forecasting for Wednesday, Thursday, and Friday. Should the forecast fall below 32 or above 100 degrees, SCE would suspend disconnections. Moving to a 7-day look-ahead does not add any additional accuracy to this process or prevent customers from being disconnected during an extreme weather event.</p> <p>b. SCE understands the intent of the LIOB’s recommendation, but SCE would require additional analysis before this could be implemented regarding safety and customer consent. Namely, stakeholders would need to first determine customer safety measures, as turning on energy without communication with the customer may lead to unintended consequences. In addition, SCE would need to research potential legal issues with billing a customer for energy when the customer did not expressly agree to power being turned on.</p>	<p>a. Not Applicable</p> <p>b. Not Applicable</p>
<p><b>2. Increase CARE Subsidies</b></p> <p>a. Increase CARE discount up to 50% for customers at the highest risk of disconnection</p>	<p>a. SCE is required by statute to provide an average CARE discount between 30 to 35 percent.<sup>46</sup> SCE recommends that this recommendation not be addressed in the transition plans but instead addressed in the appropriate proceeding for CARE.</p>	<p>a. Not Applicable</p>

<sup>46</sup> Section 739.1(c)(1) of the Public Utilities Code

<p>3. <b>Data Sharing with Water Utilities</b>  a. Instruct IOUs to share CARE data with water utilities no less than once a quarter   b. Make this a permanent policy</p>	<p>a. SCE supports additional data sharing but recognizes that the water utilities may not all be ready to do so at the same frequency. While SCE does not object to this request, it cautions that this may not be practical for all utilities.   b. SCE does not object to this.</p>	<p>a. Section V (D)</p>
<p>4. <b>Marketing and Outreach</b>  a. Distinct marketing plans for targeting hard-to-reach customers   b. Increase marketing budgets by 50% for the transition period   c. Develop reporting mechanisms to track expenditures and outcome results from partnerships with CBOs</p>	<p>a. SCE intends to utilize its CBO and agency partners to engage customers that are hard-to-reach. SCE has also contracted with a CBO specifically to target customers speaking indigenous languages   b. SCE's transition plan will provide customers multiple opportunities to learn about assistance programs. There is not a specific budget for this outreach, but SCE has estimated its incremental costs within the transition plan.   c. Because customers are likely to receive outreach through a variety of pathways, it would not be practical to track all the various means a customer may have heard about the benefit programs. Expenditures regarding the incremental costs for outreach will be recorded to the CPPMA.</p>	<p>a. Section II (C)   b. Section VII   c. Section VII</p>
<p>5. <b>Define and Measure Success</b>  a. LIOB recommends a list of metrics to be incorporated into the plan   b. Include a definition of success in the metrics.</p>	<p>a. Further explained in the metrics section   b. Further explained in the metrics section</p>	<p>a. Section VI   b. Section VI</p>
<p>6. <b>Aliso Canyon Best Practices</b>  a. Enhance ESA with emergency energy cost reductions measures that ensure a minimum of 10% savings to low-income ratepayer bills</p>	<p>a. SCE recommends that this be discussed in the appropriate income-qualified proceeding. SCE will help ESA contractors prioritize those customers in arrears and also provide outreach materials for the ESA contractors to leave behind should the customer have questions regarding their unpaid bills.</p>	<p>a. Section II (C)</p>

<p><b>7. Coordination with LIHEAP</b> a. Establish data sharing agreements with LSPs and CSD</p> <p>b. Explore opportunities to fund joint program enrollment pilots</p>	<p>a. SCE will explore the feasibility of additional data sharing agreements with LSPs and CSD.</p> <p>b. SCE will explore the feasibility of such a pilot with our LSPs and CSD but is unable to determine what this may entail.</p>	<p>a. Section V (E)</p> <p>b. Not Applicable</p>
<p><b>8. Referral to Weatherization and Other Programs</b> a. Referral to ESA, LIWP, and other weatherization programs in the AMP enrollment process.</p> <p>b. Work 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.</p>	<p>a. SCE will explore referrals to ESA, LIWP, and other weatherization programs as part of the AMP enrollment process. However, SCE recognizes that LIWP is not administered by SCE and that there are existing pathways for referrals between CARE and ESA.</p> <p>b. SCE will explore additional coordination with the parties listed. In certain instances, such as AMP, the eligibility requirements have been determined within the specific proceeding and would require an appropriate regulatory procedure, such as a Petition for Modification, to change.</p>	<p>a. Not Applicable</p> <p>b. Not Applicable</p>

### C. CPUC Commissioners and Energy Division Feedback

On March 22, 2021, SCE received feedback from Energy Division (ED).<sup>47</sup> Additional feedback, specifically on non-IOU administered relief programs, was received from ED on March 30, 2021.<sup>48</sup> SCE appreciates the ED feedback and has incorporated the feedback, wherever feasible, into the transition plan.

<b>CPUC Recommendation</b>	<b>SCE Response</b>	<b>Transition Plan Section (if applicable)</b>
<p><b>1. Add reporting metrics</b> a. Send proposed metrics to ED for preliminary review.</p> <p>b. Include number of customers that participate in a 12-month payment plan.</p>	<p>a. The IOUs submitted preliminary metrics and discussed with ED on March 29, 2021.</p> <p>b. SCE has included this metric.</p>	<p>a. Not Applicable</p> <p>b. Section VI</p>

<sup>47</sup> Email from Jenneille Hsu to all of the large energy IOUs on March 22, 2021.

<sup>48</sup> Email from Jenneille Hsu to all of the large energy IOUs on March 30, 2021.

<p><b>2. Leverage network of local LIHEAP service providers (LSP) to promote AMP and other low-income programs.</b></p>	<p>SCE previously provided training to its LSPs on the AMP program and is including LIHEAP in its list of programs for outreach materials. SCE will offer a similar training to LSPs regarding its assistance programs prior to the end of Emergency Customer Protections.</p>	<p>Section V (E)</p>
<p><b>3. Address Commissioners' Comments in the March 11 LIOB Meeting</b></p> <p>a. Use of simple communications</p> <p>b. Align CARE recertification schedule across IOUs</p> <p>c. Consider word choice for "eligible for disconnections"</p> <p>d. Put more consideration / planning into call center volume / staffing to mitigate long wait times</p> <p>e. Offer multiple languages in customer communication</p> <p>f. Customer safeguards to mitigate concerns with customer scams without detracting from other critical pieces to meet transition plan goals.</p>	<p>a. SCE has contracted with a third-party to tailor its outreach materials to balance simplicity while still allowing for communication of all available assistance programs</p> <p>b. SCE has engaged the other IOUs but the programs differ slightly in operations and are unable to be fully aligned at this time.</p> <p>c. SCE has updated the transition plan to use "subject to disconnection"</p> <p>d. SCE has contracted with an additional third-party to augment its current call center staff.</p> <p>e. SCE currently plans to offer the factsheet in 19 different languages and provide customers speaking 3 additional indigenous languages to receive information through partnership with a CBO.</p> <p>f. SCE will discuss in its stakeholder meetings with CBOs on how best to mitigate concerns with customer scams.</p>	<p>a. Section II (C)</p> <p>b. Not Applicable</p> <p>c. Throughout the transition plan</p> <p>d. Section II (C)</p> <p>e. Section II (D)</p> <p>f. Section II (C)</p>
<p><b>4. Promote rent and utility relief programs through IOU marketing channels.</b></p>	<p>SCE will add the newly created California COVID-19 Rent Relief Program to its webpage and will add additional programs as they become available.</p>	<p>Section II (C)</p>

<b>5. IOUs should track the payment receive from the relief program by including metrics on number and dollar amounts for applications and successful completion.</b>	Further explained in the metrics section	Section VI
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#### **D. Water Agencies Coordination**

Resolution M-4849 requested that SCE consider increasing the frequency with which energy and water IOUs exchange data on accounts enrolled in income-eligible programs so that eligible customers can be targeted for enrollment.<sup>49</sup> SCE supports increasing the frequency of these exchanges and understands that the additional frequency can increase effectiveness of customer outreach. SCE will continue efforts to collaborate with the water agencies in its service territory on the sharing of data. SCE is supportive of LIOB's recommendation that the data be shared no less than on a quarterly basis.

#### **E. LIHEAP Service Providers (LSP) and California Department of Community Services & Development (CSD) Coordination**

On January 28, 2021, SCE provided training on the Arrearage Management Plan (AMP) for the LSPs within its service territory as well as representatives from CSD. This training occurred prior to the implementation of the AMP program. As part of this training, SCE provided background on the AMP, customer eligibility requirements, customer notifications, and suggestions on how LSPs can help to promote the program. SCE also made sure LSPs were aware that while a customer is in AMP, any LIHEAP pledges or payments will only be applied to the customer's current and future bill(s) and cannot be applied to the outstanding arrears.<sup>50</sup> SCE intends to continue its engagement with LSPs and CSD by offering a similar training regarding the end of Emergency Customer Protections and provide the LSPs with the same outreach materials as the CBOs.

In addition to including LIHEAP in its outreach materials, residential customers that call SCE's CCC will be informed about LIHEAP prior to the customer being subject to disconnection. While not ordered to do so because LIHEAP is not a program administered by the utility,<sup>51</sup> SCE recognizes the benefit that customers receive from

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

<sup>50</sup> Pursuant to D.20-06-003, OP 67.

<sup>51</sup> D.20-06-003 OP 1(c) requires that residential customers shall not be disconnected for nonpayment until the utility offers to enroll eligible customers in all applicable benefit programs administered by the utility.



LIHEAP and has elected to include the program information to increase the opportunity for customers to be notified of the program.

On March 15, 2021, SCE launched its LIHEAP Online Pledge Portal<sup>52</sup> in compliance with D.20-06-003.<sup>53</sup> The portal allows LSPs to make pledges online rather than be limited to making pledges through the Interactive Voice Response (IVR) system. The portal also represents an advancement over the IVR system as it allows for CSD and LSPs to receive reports that contain the account number, service address, account holder name, current charges and amount due, number of billing days in the current cycle, bill history for the previous 12-months, pledge acceptance or rejection status, customer's last bill, and a tracking number for each pledge.

SCE recognizes the potential benefits of greater coordination to direct LIHEAP funds to the customers in greatest need and will explore the feasibility of additional data sharing with CSD.

## **VI. Program Metrics and Required Data**

Resolution M-4849 required SCE to include a “plan for reporting progress in the timeline, and present metrics that will track and report to monitor success in achieving the goal of effectively easing customers through a transition off of Emergency Customer Protections.”<sup>54</sup> Specifically, the Commission required SCE to include a progress metric for each of the following areas:

- Customers who 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; and
- New enrollments of impacted customers in payment programs since beginning implementation of the transition plan.

As a guiding principle, SCE chose metrics that:

- are discretely defined;
- are quantitative data driven and
- remove outside factors, where possible.

The discretely defined metrics allow for comparisons between the energy IOUs and limit the potential for confusion. Metrics that are quantitative in nature serve to eliminate different interpretations of the same situation from multiple parties and the removal of outside factors help to focus the metrics on policies that can be influenced by the actions of the IOUs. To prevent data discrepancies, SCE sought to leverage currently

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<sup>52</sup> <https://scepledgeportal.smartcmobile.com/portal>.

<sup>53</sup> D.20-06-003, OP 27.

<sup>54</sup> Resolution M-4849, p. 15.

available data points and reports wherever possible. SCE recommends that a working group be established to work through the metrics as there may be operational differences between the utilities or interpretation of the data that would need to be resolved before commencement of reporting. SCE also recommends that a single template be developed so that the data is presented in a uniform fashion.

In its recommendations, LIOB identified the metrics below.<sup>55</sup> SCE has included its response to each metric.

- *What number and percentage of disconnections were households enrolled in AMP?*  
Customers enrolled in AMP are prevented from disconnection. As the two occurrences are mutually exclusive SCE did not include this as a metric.
- *What number and percentage of disconnections were households enrolled in CARE where applicable?*  
This data is currently available as part of the monthly disconnection report in R.18-07-005. SCE did not include this as the information is already publicly available.
- *What number and percentage of disconnections were households enrolled in CARE and AMP?*  
As previously stated, SCE did not include this metric because customers enrolled in AMP are not subject to disconnection.
- *What number and percentage of disconnections were households that received assistance from the LIHEAP program?*  
SCE would require additional parameters such as to the timing of when the customer received assistance. While SCE is open to exploring this proposal as a metric a better understanding of the appropriate time period to use is required.
- *What percentage and number of households enrolled in AMP were referred to the following programs: ESA, LIWP LIHEAP, other programs?*  
SCE does not currently refer customers due to their enrollment in AMP.
- *What were the median and average length of disconnections?*  
This data exists, but the median and average length calculations may not be useful data points. Specifically, if a customer never reconnects, the data will not calculate correctly. Instead SCE recommends use of the disconnection monthly report in R.18-07-005 that contains information regarding the number of customers experiencing disconnection for non-payment and provides additional information regarding the number of customers reconnected within 24, 48, 72, and more than 72 hours. This provides a better indicator of how long customers may be disconnected for.

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<sup>55</sup> LIOB feedback sent by Gillian Weaver on behalf of the LIOB to the service list for R.15-03-010, R.18-07-006, and R.18-07-005.

- *What were the median and average arrearage amount and time past due from a disconnection?*

SCE agrees that this data may be useful but would need additional time to confirm that all utilities utilize similar parameters for ranking which customers are subject to disconnection. Without first confirming this data may have the unintended consequence of causing more confusion than providing guidance.

In addition, ED also recommended additional metrics via email.<sup>56</sup> In the email, ED recommended that the IOUs should include the number of payments and total dollar amounts associated with customers that have applied and received assistance from the newly created California COVID-19 Rent Relief Program.<sup>57</sup> As stated into the Marketing, Education, and Outreach section, SCE will add this new program to the list on SCE.com of additional programs that may be available to assist customers. As SCE is not the administrator for the program, however, SCE is unable to track the number of customers that have applied. Because the Rent Relief Program is new, the exact details for how the assistance would be applied is not yet determined and it would not be prudent to create a metric that may not be possible.

Table 6 provides an overview of SCE's proposed metrics. Each metric may need further discussion to determine if a baseline can be established. The current monthly disconnection report in R.18-07-005 already provides substantial information regarding residential customer arrearage levels, payment plans, and age of arrears as well as disconnections by zip code. As directed in Resolution M-4849, SCE will report the metrics in its monthly disconnect data reports filed in R.18-07-005.<sup>58</sup> Because SCE's proposed method for some metrics is to start counting July 1, 2021, SCE proposes that the new reporting start in the July monthly report to be filed August 20, 2021.<sup>59</sup> This start date will also allow for time to incorporate SCE's recommendation of a working group to discuss issues regarding the metrics, including interpretation of data reporting requirements and any operational differences between the IOUs to help implement reporting that is useful for stakeholders. Additionally, because this reporting is intended to track information for a temporary transition period, SCE proposes that the reporting requirements sunset after one year, at which point any R.18-07-005 monthly disconnect

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<sup>56</sup> Email from Jenneille Hsu to all large energy IOUs on March 30, 2021.

<sup>57</sup> <https://www.hcd.ca.gov/grants-funding/active-funding/erap.shtml>

<sup>58</sup> Resolution M-4849, p. 16 ("Energy IOUs shall report in the monthly report required by the Disconnections Proceeding, R.18-07-005."). SCE notes that R.18-07-005 was issued to address residential disconnections, and that some of the metrics being proposed as required by Resolution M-4849 involve Small Business Customers. Nonetheless, SCE will, as directed by Resolution M-4849, report the metrics in its monthly disconnect data reports filed in R.18-07-005.

<sup>59</sup> See *id.*, p. 17 ("The Industry Division's disposition of the Transition Plan Advice Letter will indicate the first monthly report delivery date.").

data reports still being filed will no longer include these metrics. For the reporting pursuant to Resolution M-4849, SCE proposes to utilize the following metrics:

**Table 6: Incremental Transition Plan Metrics and Methodology**

<b>Metric</b>	<b>Methodology</b>
<b>Retention of customers enrolled between March 16, 2020 and June 30, 2021</b>	
Percentage of customers that complete Post-Enrollment Verification (PEV) for CARE	<p>Data Set: Customers enrolled in CARE during the protections period (3/16/2020-6/30/2021)</p> <p>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.</p>
Percentage of customers that complete PEV for FERA	<p>Data Set: Customers enrolled in FERA during the protections period (3/16/2020-6/30/2021)</p> <p>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.</p>
Number of customers that remain on AMP	<p>Data Set: Customers enrolled in AMP during the protections period (3/16/2020-6/30/2021)</p> <p>Method: The total number of customers enrolled in AMP during the protection period, based on the data set, minus those who dropped out of AMP, starting July 1, 2021.</p>
Number of residential and small business customers remain on a 12-month payment plan	<p>Data Set: Customers enrolled in a 12-month payment plan during the protections period (3/16/2020-6/30/2021)</p> <p>Method: The total number of customers 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.</p>
<b>New enrollments of impacted customers in payment plans start July 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 EAF	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

SCE included the required data in Attachment A; namely, Resolution M-4849 required that the IOUs include:<sup>60</sup>

- 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.
- 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

<sup>60</sup> Resolution M-4849, pp. 14-15.

- extended payment plan, and
- c. More than \$250 in total arrears.

In compliance with D.14-05-016, SCE has aggregated ZIP codes with total populations of less than 100 Residential or 15 Small Business Customers to nearby ZIP codes to prevent accidental customer identification.<sup>61</sup>

## VII. Estimated Marketing Budget and Cost Recovery

SCE intends to continue recording activities associated with the Emergency Customer Protections in the COVID-19 Pandemic Protections Memorandum Account (CPPMA) and the Residential Uncollectibles Balancing Account (RUBA) during the transition period. Uncollectibles associated with Small Business arrears as well as all marketing and outreach costs associated with the communication for the end of Emergency Customer Protections will be recorded to the CPPMA. Uncollectibles associated with Residential arrears will continue to be recorded in the RUBA.

To update the webpages, contract with a third party to create and send the direct mail, update the factsheet and translate the factsheet in multiple languages, place targeted ads on Facebook, purchase search ads, and perform customer research, SCE estimates an incremental cost of \$670,000 will be recorded in the CPPMA in 2021 for future cost recovery. Table 7 provides a high-level estimate of expected marketing and outreach costs to be recorded in the CPPMA.

**Table 7: Marketing and Outreach Costs to be Recorded in the CPPMA**

<b>Activity</b>	<b>Estimated Cost</b>
Paid Search	\$25,000
Third-Party Marketing Development <ul style="list-style-type: none"> <li>• Account Management</li> <li>• Project Management</li> <li>• Strategic Planning</li> <li>• Creative Development</li> <li>• Marketing Science</li> <li>• Production</li> </ul>	\$275,000
Factsheet Language Translations	\$6,000
SCE.com Language Translations	\$7,000
Direct Mail for residential and Small Business Customers <ul style="list-style-type: none"> <li>• Printing</li> <li>• Postage</li> </ul>	\$80,000

<sup>61</sup> D.14-05-016, Findings of Fact 16 and 17.

Indigenous Outreach	\$27,000
Customer Tracking Study	\$250,000
<b>Total</b>	<b>\$670,000</b>

## PROPOSED TARIFF CHANGES

Consistent with the information provided above, the following tariffs are being revised and will denote an effective date of July 1, 2021:

### Schedule SC, *Service Connection Charge*

Special Condition 1. The Service Connection Charge provided herein may be charged each time an account is established or reconnected for non-payment of a bill. Establishment means each time an account is opened, including a turn-on of electric service or a change of name which requires a meter reading that may be obtained remotely. ~~Until further notice, the Service Connection Charge will not apply to Small Business Customers who temporarily turned off electricity service due to the COVID-19 pandemic and then restarted service at the same location under the same name.~~

### Rule 9, *Rendering of Payment of Bills*

SCE is removing language that prohibited the application of the Late Payment Charge.

#### F. Late Payment Charge.

~~The following terms and conditions relating to the Late Payment Charge will not apply until further notice to residential and Small Business Customers:~~

In addition and for added clarification, SCE submitted Advice 4253-E/E-A and 234-G/G-A pursuant to D.20-06-003.<sup>62</sup> In that advice letter, SCE proposed tariff changes that would be implemented once the Emergency Customer Protections expired. As such, the tariff changes proposed in Advice 4253-E/E-A and 234-G/G-A will take effect July 1, 2021. The tariffs contained therein revised gas and electric tariffs as follows:

- Rule 6, *Establishment and Re-Establishment of Credit* – Section B was revised to remove, in its entirety, the Establishment of Credit for Domestic Service provision and also remove the suspension of the Establishment of Credit for Other Than Domestic Service language; thus deposits will apply again to Small Business Customers.
- Rule 7, *Deposits* – the Establishment or Re-establishment of Deposits will no

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<sup>62</sup> Phase I Decision Adopting Rules and Policy Changes to Reduce Residential Customer Disconnections for the Larger California-Jurisdictional Energy Utilities.

longer apply to residential customers and these provisions were identified as such or removed.

- Rule 11, *Discontinuance and Restoration of Service* – language regarding the suspension of disconnections for nonpayment to residential and Small Business Customers has been removed.

### **TIER DESIGNATION**

Pursuant to OP 5 of Resolution M-4849, SCE submits this advice letter with a Tier 2 designation.

### **EFFECTIVE DATE**

This advice letter will become effective on May 1, 2021, the 30th calendar day after the date submitted. The proposed tariff changes will become effective July 1, 2021.

### **NOTICE**

Anyone wishing to protest this advice letter may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this advice letter. Protests should be submitted to:

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

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

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

Gary A. Stern, Ph.D.  
Managing Director, State Regulatory Operations  
Southern California Edison Company  
8631 Rush Street  
Rosemead, California 91770  
Telephone: (626) 302-9645  
Facsimile: (626) 302-6396  
E-mail: [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com)



Tara S. Kaushik  
Managing Director, Regulatory Relations  
c/o Karyn Gansecki  
Southern California Edison Company  
601 Van Ness Avenue, Suite 2030  
San Francisco, California 94102  
Facsimile: (415) 929-5544  
E-mail: [Karyn.Gansecki@sce.com](mailto:Karyn.Gansecki@sce.com)

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

In accordance with General Rule 4 of GO 96-B, SCE is serving copies of this advice letter to the interested parties shown on the attached Gas and Electric GO 96-B and the R.18-03-011, A.14-11-007, A.15-02-001, A.19-11-003, A.20-03-014, R.15-03-010, R.18-07-006, R.18-07-005, R.12-06-013, and A.19-09-014 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com) or at (626) 302-3719. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).

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

For questions, please contact Eric Lee at (626) 302-0674 or by electronic mail at [eric.lee@sce.com](mailto:eric.lee@sce.com).

**Southern California Edison Company**

/s/ Gary A. Stern  
Gary A. Stern, Ph.D.

GAS:el:cm  
Enclosures



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.:

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person:

Phone #:

E-mail:

E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type:  Monthly     Quarterly     Annual     One-Time     Other:

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

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

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

Confidential treatment requested?  Yes     No

If yes, specification of confidential information:

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

Resolution required?  Yes     No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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

Tariff schedules affected:

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

Pending advice letters that revise the same tariff sheets:

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

**Protests and 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:  
Title:  
Utility Name:  
Address:  
City:  
State: Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

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

## ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

# Attachment A

Unique Residential and Small Business Customers more than 90 days in Arrears by ZIP Code

ZIP Code	Number of Unique Residential Customers who are: - more than 90 days in arrears - not enrolled in a payment plan	Number of Unique Residential Customers who are: - more than 90 days in arrears	Percent of Residential Customers who are more than 90 days in arrears and not enrolled in a payment plan	Number of Unique Small Business Customers who are: - more than 90 days in arrears - not enrolled in a payment plan	Number of Unique Small Business Customers who are: - more than 90 days in arrears	Percent of Unique Small Business Customers who are more than 90 days in arrears and not enrolled in a payment plan
90001	1,427	1,669	86%	106	126	84%
90002	475	559	85%	13	13	100%
90008	43	56	77%	-	-	0%
90022	2,079	2,473	84%	194	221	88%
90023	496	591	84%	41	48	85%
90032 / 91803	463	581	80%	47	49	96%
90038	31	37	84%	2	2	100%
90040	263	356	74%	24	29	83%
90043	222	307	72%	19	19	100%
90044	1,573	1,915	82%	53	55	96%
90045	31	31	100%	2	2	100%
90046	815	882	92%	56	58	97%
90047	583	748	78%	13	14	93%
90048	119	136	88%	6	6	100%
90056	163	238	68%	14	14	100%
90059	399	545	73%	12	14	86%
90061	279	370	75%	18	21	86%
90063	998	1,200	83%	62	65	95%
90066	128	138	93%	25	27	93%
90069	572	636	90%	65	74	88%
90201	2,859	3,688	78%	161	187	86%
90210	187	224	83%	34	37	92%
90211	184	223	83%	29	33	88%
90212	281	334	84%	25	27	93%
90220	1,224	1,809	68%	61	69	88%
90221	1,327	1,838	72%	101	114	89%
90222	864	1,175	74%	52	60	87%
90230	258	317	81%	24	28	86%
90232	188	220	85%	35	40	88%
90240	480	701	68%	34	40	85%
90241	1,139	1,497	76%	92	102	90%
90242	1,067	1,395	76%	42	45	93%
90245	204	236	86%	29	30	97%
90247	950	1,247	76%	74	78	95%
90248	71	100	71%	36	44	82%
90249	578	776	74%	113	125	90%
90250 / 90251	2,709	3,313	82%	140	157	89%
90254	216	251	86%	40	42	95%
90255	2,040	2,617	78%	214	251	85%
90260	694	905	77%	40	47	85%
90262	1,559	2,156	72%	92	121	76%
90265	206	248	83%	26	28	93%
90266	270	295	92%	35	37	95%
90270	769	959	80%	32	39	82%
90274	147	177	83%	20	20	100%
90275	259	359	72%	8	8	100%
90277	429	521	82%	45	48	94%
90278	447	562	80%	36	38	95%
90280	2,431	3,130	78%	189	206	92%
90290	65	103	63%	6	8	75%
90292	387	427	91%	1	1	100%
90301	1,280	1,764	73%	125	140	89%
90302	1,144	1,566	73%	79	88	90%
90303	844	1,112	76%	38	43	88%
90304	641	763	84%	51	55	93%
90305	510	726	70%	20	25	80%
90401	313	342	92%	51	57	89%
90402	124	135	92%	8	9	89%
90403	500	569	88%	31	33	94%
90404	606	696	87%	47	49	96%
90405	509	577	88%	53	57	93%
90501	315	425	74%	56	65	86%
90502	240	313	77%	38	42	90%
90503	394	518	76%	18	21	86%
90504	417	533	78%	25	26	96%
90505	312	442	71%	42	49	86%
90601	709	999	71%	54	62	87%
90602	703	918	77%	40	46	87%
90603	236	372	63%	9	12	75%
90604	736	975	75%	15	21	71%
90605	698	946	74%	50	57	88%
90606	528	770	69%	50	57	88%
90620	522	808	65%	31	31	100%
90621	631	936	67%	33	37	89%
90623	128	208	62%	4	4	100%
90630	424	657	65%	22	26	85%
90631	1,292	1,723	75%	102	113	90%
90638	431	659	65%	26	28	93%
90640	1,524	2,113	72%	146	163	90%
90650	1,557	2,318	67%	96	108	89%
90660	1,030	1,440	72%	94	104	90%
90670	227	368	62%	120	133	90%
90680	450	641	70%	62	71	87%
90701	195	279	70%	47	52	90%
90703	345	543	64%	52	54	96%
90704	69	103	67%	10	15	67%
90706	1,881	2,788	67%	128	146	88%

**Unique Residential and Small Business Customers more than 90 days in Arrears by ZIP Code**

ZIP Code	Number of Unique Residential Customers who are: - more than 90 days in arrears - not enrolled in a payment plan	Number of Unique Residential Customers who are: - more than 90 days in arrears	Percent of Residential Customers who are more than 90 days in arrears and not enrolled in a payment plan	Number of Unique Small Business Customers who are: - more than 90 days in arrears - not enrolled in a payment plan	Number of Unique Small Business Customers who are: - more than 90 days in arrears	Percent of Unique Small Business Customers who are more than 90 days in arrears and not enrolled in a payment plan
90710	30	45	67%	1	1	100%
90712	359	570	63%	14	19	74%
90713	217	378	57%	7	7	100%
90715	377	552	68%	15	16	94%
90716	260	337	77%	28	31	90%
90717	466	601	78%	20	26	77%
90720	193	296	65%	39	41	95%
90723	1,509	1,941	78%	123	142	87%
90731	39	51	76%	2	2	100%
90732	11	15	73%	-	-	0%
90740	194	254	76%	16	18	89%
90742 / 90742	28	29	97%	3	3	100%
90745	843	1,148	73%	61	67	91%
90746	407	629	65%	25	29	86%
90755	193	289	67%	43	47	91%
90802	1,736	2,098	83%	55	59	93%
90803	551	663	83%	29	34	85%
90804	1,211	1,549	78%	63	68	93%
90805	2,267	3,205	71%	152	172	88%
90806	1,031	1,395	74%	67	71	94%
90807	532	753	71%	28	34	82%
90808	296	436	68%	15	20	75%
90810	633	889	71%	37	43	86%
90813	2,120	2,621	81%	120	139	86%
90814	407	522	78%	18	19	95%
90815	321	479	67%	20	22	91%
91001	524	748	70%	24	26	92%
91006	328	421	78%	51	53	96%
91007	377	475	79%	25	28	89%
91008	11	14	79%	2	2	100%
91010	305	450	68%	31	35	89%
91011	88	124	71%	10	12	83%
91016	759	1,028	74%	66	72	92%
91020	89	120	74%	6	6	100%
91024	123	163	75%	10	12	83%
91030	347	423	82%	20	22	91%
91104	72	99	73%	5	6	83%
91107	129	168	77%	12	12	100%
91108	80	97	82%	11	13	85%
91214	113	155	73%	9	9	100%
91301	237	316	75%	27	35	77%
91302	360	473	76%	19	20	95%
91307	29	49	59%	-	-	0%
91311	59	88	67%	-	-	0%
91320	403	552	73%	45	48	94%
91321	515	753	68%	33	37	89%
91340	470	657	72%	77	89	87%
91342	17	26	65%	2	2	100%
91350	372	608	61%	39	42	93%
91351	598	879	68%	52	56	93%
91354	331	495	67%	2	2	100%
91355	412	604	68%	45	47	96%
91360	435	600	73%	12	15	80%
91361	229	295	78%	26	29	90%
91362	383	522	73%	53	59	90%
91377	113	163	69%	2	3	67%
91381	239	328	73%	6	6	100%
91384	216	369	59%	13	15	87%
91387	900	1,369	66%	12	13	92%
91390	200	336	60%	11	18	61%
91701	460	761	60%	14	16	88%
91702	142	216	66%	9	17	53%
91706	1,209	1,676	72%	131	144	91%
91708	211	354	60%	1	1	100%
91709	774	1,207	64%	22	24	92%
91710	1,199	1,966	61%	81	90	90%
91711	361	510	71%	22	28	79%
91722	541	808	67%	32	35	91%
91723	460	712	65%	50	64	78%
91724	396	613	65%	26	30	87%
91730	1,648	2,616	63%	140	158	89%
91731	602	807	75%	71	75	95%
91732	1,235	1,664	74%	81	95	85%
91733	912	1,156	79%	174	195	89%
91737	295	498	59%	3	3	100%
91739	538	879	61%	5	5	100%
91740	352	548	64%	53	62	85%
91741	242	388	62%	14	14	100%
91744	1,053	1,549	68%	73	87	84%
91745	547	794	69%	36	42	86%
91746	329	501	66%	68	76	89%
91748	559	740	76%	49	51	96%
91750	307	523	59%	19	24	79%
91752	638	980	65%	16	17	94%
91754	407	561	73%	42	44	95%
91755	259	357	73%	16	17	94%
91759	6	16	38%	-	-	0%

Unique Residential and Small Business Customers more than 90 days in Arrears by ZIP Code

ZIP Code	Number of Unique Residential Customers who are: - more than 90 days in arrears - not enrolled in a payment plan	Number of Unique Residential Customers who are: - more than 90 days in arrears	Percent of Residential Customers who are more than 90 days in arrears and not enrolled in a payment plan	Number of Unique Small Business Customers who are: - more than 90 days in arrears - not enrolled in a payment plan	Number of Unique Small Business Customers who are: - more than 90 days in arrears	Percent of Unique Small Business Customers who are more than 90 days in arrears and not enrolled in a payment plan
91761	987	1,609	61%	110	120	92%
91762	1,454	2,171	67%	131	142	92%
91763	796	1,184	67%	98	115	85%
91764	1,473	2,150	69%	30	32	94%
91765	393	607	65%	28	30	93%
91766	1,517	2,105	72%	92	104	88%
91767	1,219	1,674	73%	65	77	84%
91768	793	1,057	75%	58	65	89%
91769	-	1	0%	-	-	0%
91770	607	823	74%	64	66	97%
91773	314	526	60%	49	55	89%
91775	235	312	75%	7	7	100%
91776	480	631	76%	61	67	91%
91780	381	501	76%	41	42	98%
91784	200	313	64%	2	3	67%
91786	1,454	2,206	66%	131	151	87%
91789	300	434	69%	63	66	95%
91790	635	1,048	61%	46	53	87%
91791	536	809	66%	15	15	100%
91792	554	834	66%	16	17	94%
91801	910	1,148	79%	67	71	94%
92210	53	85	62%	4	5	80%
92211	289	519	56%	21	29	72%
92220	64	80	80%	1	1	100%
92223	827	1,460	57%	35	37	95%
92225	535	825	65%	30	33	91%
92230	95	141	67%	3	3	100%
92234	1,242	2,048	61%	83	92	90%
92240	1,541	2,355	65%	47	50	94%
92241	92	155	59%	2	3	67%
92252	311	420	74%	5	6	83%
92256	126	177	71%	6	8	75%
92258	15	23	65%	6	7	86%
92260	665	1,035	64%	89	108	82%
92262	853	1,182	72%	72	86	84%
92264	493	658	75%	33	37	89%
92267	9	12	75%	-	-	0%
92268	12	16	75%	-	-	0%
92270	268	402	67%	14	16	88%
92277	554	869	64%	42	47	89%
92282	43	65	66%	1	1	100%
92284	610	973	63%	43	46	93%
92285	62	95	65%	-	1	0%
92301	1,188	1,836	65%	16	19	84%
92305	17	21	81%	1	1	100%
92307	1,100	1,659	66%	39	43	91%
92308	903	1,368	66%	39	43	91%
92309	15	20	75%	1	1	100%
92311	1,179	1,768	67%	56	65	86%
92313	238	389	61%	11	13	85%
92316	524	785	67%	38	40	95%
92317	12	15	80%	6	6	100%
92320	126	216	58%	8	9	89%
92321	31	34	91%	3	3	100%
92322	28	48	58%	1	1	100%
92324	76	126	60%	5	5	100%
92325	301	403	75%	7	7	100%
92327	23	32	72%	1	1	100%
92328	3	4	75%	-	-	0%
92335	2,327	3,487	67%	113	126	90%
92336	1,453	2,674	54%	25	26	96%
92337	640	1,112	58%	12	13	92%
92339	27	40	68%	-	-	0%
92341	19	24	79%	-	-	0%
92342	112	212	53%	8	9	89%
92344	339	613	55%	1	3	33%
92345	1,838	3,040	60%	144	163	88%
92346	1,125	1,913	59%	25	30	83%
92347	16	23	70%	6	6	100%
92352	214	263	81%	9	9	100%
92354	330	558	59%	21	22	95%
92356	134	233	58%	13	15	87%
92358	20	27	74%	1	1	100%
92359	188	287	66%	9	10	90%
92363	44	60	73%	-	-	0%
92365	60	95	63%	10	11	91%
92368	24	34	71%	3	3	100%
92371	340	634	54%	8	8	100%
92372	63	146	43%	-	-	0%
92373	554	855	65%	39	42	93%
92374	717	1,180	61%	35	42	83%
92376	2,139	3,363	64%	117	137	85%
92377	353	631	56%	3	3	100%
92378	15	17	88%	1	1	100%
92382	153	202	76%	4	5	80%
92389	11	12	92%	1	1	100%
92391	44	59	75%	-	-	#DIV/0!



## Unique Residential and Small Business Customers more than 90 days in Arrears by ZIP Code

ZIP Code	Number of Unique Residential Customers who are: - more than 90 days in arrears - not enrolled in a payment plan	Number of Unique Residential Customers who are: - more than 90 days in arrears	Percent of Residential Customers who are more than 90 days in arrears and not enrolled in a payment plan	Number of Unique Small Business Customers who are: - more than 90 days in arrears - not enrolled in a payment plan	Number of Unique Small Business Customers who are: - more than 90 days in arrears	Percent of Unique Small Business Customers who are more than 90 days in arrears and not enrolled in a payment plan
92392	1,449	2,460	59%	35	40	88%
92394	866	1,481	58%	13	13	100%
92395	1,214	1,828	66%	64	70	91%
92397	89	121	74%	10	11	91%
92398	39	71	55%	3	4	75%
92399	799	1,260	63%	38	47	81%
92401	129	170	76%	32	34	94%
92404	2,364	3,614	65%	72	75	96%
92405	1,142	1,680	68%	55	60	92%
92407	1,699	2,663	64%	31	37	84%
92408	368	546	67%	127	142	89%
92410	1,842	2,606	71%	101	110	92%
92411	724	1,097	66%	20	25	80%
92501	36	49	73%	7	7	100%
92503	224	403	56%	6	6	100%
92504	106	183	58%	2	4	50%
92506 / 92507	201	293	69%	5	5	100%
92508	71	125	57%	4	4	100%
92509	1,592	2,282	70%	66	73	90%
92518	2	10	20%	2	2	100%
92530	1,510	2,300	66%	83	92	90%
92532	491	883	56%	6	7	86%
92536	17	24	71%	2	3	67%
92543	1,498	2,086	72%	50	55	91%
92544	1,236	2,036	61%	33	39	85%
92545	965	1,574	61%	9	11	82%
92548	147	246	60%	5	6	83%
92549	75	105	71%	6	7	86%
92551	609	1,072	57%	8	8	100%
92553	2,060	3,260	63%	107	119	90%
92555	307	658	47%	-	-	0%
92557	1,305	2,157	61%	20	21	95%
92562	858	1,521	56%	48	58	83%
92563	781	1,533	51%	20	21	95%
92567	180	284	63%	7	7	100%
92570	1,258	1,921	65%	51	58	88%
92571	1,272	1,928	66%	20	22	91%
92582	405	661	61%	19	20	95%
92583	1,034	1,463	71%	51	58	88%
92584	642	1,336	48%	16	20	80%
92585	283	585	48%	6	8	75%
92586	308	610	50%	8	11	73%
92587	298	553	54%	10	10	100%
92590	86	131	66%	80	87	92%
92591	632	1,009	63%	32	38	84%
92592	684	1,295	53%	17	18	94%
92595	674	1,035	65%	14	17	82%
92596	320	656	49%	5	7	71%
92602	303	397	76%	6	6	100%
92603	121	172	70%	2	2	100%
92604	233	333	70%	9	9	100%
92606	285	381	75%	16	17	94%
92610	85	132	64%	2	2	100%
92612	593	723	82%	10	10	100%
92614	417	532	78%	30	33	91%
92617	23	27	85%	(1)	-	0%
92618	901	1,098	82%	61	64	95%
92620	542	719	75%	6	6	100%
92625	120	131	92%	18	18	100%
92626	858	1,102	78%	67	75	89%
92627	1,047	1,301	80%	96	103	93%
92630	668	942	71%	49	57	86%
92637	67	147	46%	4	4	100%
92646	474	629	75%	16	20	80%
92647	1,107	1,412	78%	55	75	73%
92648	699	868	81%	37	43	86%
92649	408	507	80%	37	44	84%
92651	272	313	87%	42	47	89%
92653	160	210	76%	34	41	83%
92655	116	161	72%	6	6	100%
92656	500	745	67%	5	6	83%
92657	87	122	71%	3	3	100%
92660	430	521	83%	15	16	94%
92661	54	60	90%	7	7	100%
92663	375	442	85%	32	35	91%
92676	21	29	72%	1	1	100%
92677	118	152	78%	2	2	100%
92678	7	13	54%	-	-	0%
92679	127	201	63%	-	-	0%
92683	969	1,272	76%	105	119	88%
92688	365	572	64%	14	17	82%
92691	307	460	67%	22	24	92%
92692	199	295	67%	4	4	100%
92701	1,240	1,566	79%	76	89	85%
92703	919	1,179	78%	87	94	93%
92704	1,122	1,486	76%	85	100	85%
92705	986	1,194	83%	178	190	94%

Unique Residential and Small Business Customers more than 90 days in Arrears by ZIP Code

ZIP Code	Number of Unique Residential Customers who are: - more than 90 days in arrears - not enrolled in a payment plan	Number of Unique Residential Customers who are: - more than 90 days in arrears	Percent of Residential Customers who are more than 90 days in arrears and not enrolled in a payment plan	Number of Unique Small Business Customers who are: - more than 90 days in arrears - not enrolled in a payment plan	Number of Unique Small Business Customers who are: - more than 90 days in arrears	Percent of Unique Small Business Customers who are more than 90 days in arrears and not enrolled in a payment plan
92706	670	884	76%	24	30	80%
92707	940	1,278	74%	65	77	84%
92708	484	632	77%	63	70	90%
92780	999	1,349	74%	42	49	86%
92782	313	440	71%	3	3	100%
92801 / 92804	219	323	68%	9	12	75%
92821	416	615	68%	53	56	95%
92823	24	36	67%	1	1	100%
92831	655	892	73%	77	81	95%
92832	503	683	74%	46	53	87%
92833	659	923	71%	23	25	92%
92835	248	353	70%	7	10	70%
92840	664	942	70%	43	49	88%
92841	450	610	74%	45	48	94%
92843	558	739	76%	90	96	94%
92844	291	377	77%	31	34	91%
92845	115	172	67%	9	9	100%
92860	316	500	63%	27	27	100%
92861	26	41	63%	1	1	100%
92865	253	384	66%	38	42	90%
92866	276	393	70%	17	18	94%
92867	549	754	73%	86	97	89%
92868	663	845	78%	35	38	92%
92869	341	483	71%	18	22	82%
92870	551	842	65%	43	50	86%
92879	1,006	1,488	68%	33	36	92%
92880	766	1,336	57%	19	24	79%
92881	402	667	60%	15	16	94%
92882	1,106	1,640	67%	45	52	87%
92883	393	711	55%	6	6	100%
92886	341	498	68%	14	15	93%
92887	146	220	66%	12	12	100%
93001	654	778	84%	65	77	84%
93003	785	954	82%	138	145	95%
93004	467	572	82%	16	17	94%
93010	600	768	78%	37	42	88%
93012	258	366	70%	32	36	89%
93013	196	246	80%	9	9	100%
93015	241	363	66%	18	18	100%
93021	390	511	76%	26	29	90%
93022	76	107	71%	5	5	100%
93023	278	372	75%	44	48	92%
93030	1,231	1,479	83%	139	153	91%
93033	1,220	1,454	84%	79	92	86%
93035	398	495	80%	15	18	83%
93036	835	1,028	81%	34	39	87%
93040	43	60	72%	1	1	100%
93041	437	573	76%	21	22	95%
93060	655	837	78%	36	43	84%
93063	567	902	63%	37	40	93%
93065	866	1,241	70%	62	75	83%
93066	31	40	78%	6	8	75%
93067	11	14	79%	-	-	0%
93101	618	746	83%	40	47	85%
93103	267	341	78%	25	25	100%
93105	224	289	78%	34	35	97%
93108	72	97	74%	8	8	100%
93109	132	163	81%	1	2	50%
93110	143	180	79%	2	3	67%
93111	115	147	78%	4	4	100%
93117	472	574	82%	52	59	88%
93202	102	151	68%	3	3	100%
93205	96	135	71%	3	4	75%
93208	9	12	75%	2	2	100%
93215	902	1,398	65%	66	70	94%
93218	23	33	70%	1	1	100%
93219	171	239	72%	12	14	86%
93221	350	553	63%	26	28	93%
93222	32	56	57%	2	4	50%
93223	223	343	65%	12	12	100%
93225	148	212	70%	15	17	88%
93227	72	113	64%	-	-	0%
93230	1,647	2,533	65%	70	75	93%
93235	117	175	67%	4	4	100%
93238	24	35	69%	5	8	63%
93240	126	230	55%	12	13	92%
93244	16	24	67%	1	1	100%
93247	472	700	67%	22	27	81%
93250	99	140	71%	3	3	100%
93255	14	20	70%	1	1	100%
93256	132	188	70%	13	13	100%
93257 / 93258	1,979	3,001	66%	119	129	92%
93260	17	19	89%	-	-	0%
93261	61	82	74%	-	-	0%
93265	74	115	64%	5	6	83%
93267	160	232	69%	10	11	91%
93270	115	172	67%	8	8	100%

**Unique Residential and Small Business Customers more than 90 days in Arrears by ZIP Code**

ZIP Code	Number of Unique Residential Customers who are: - more than 90 days in arrears - not enrolled in a payment plan	Number of Unique Residential Customers who are: - more than 90 days in arrears	Percent of Residential Customers who are more than 90 days in arrears and not enrolled in a payment plan	Number of Unique Small Business Customers who are: - more than 90 days in arrears - not enrolled in a payment plan	Number of Unique Small Business Customers who are: - more than 90 days in arrears	Percent of Unique Small Business Customers who are more than 90 days in arrears and not enrolled in a payment plan
93271	48	64	75%	5	7	71%
93272	76	118	64%	1	2	50%
93274	1,768	3,021	59%	71	81	88%
93277	1,458	2,193	66%	57	65	88%
93283	55	89	62%	2	2	100%
93285	93	121	77%	7	7	100%
93286	218	330	66%	9	10	90%
93287	-	5	0%	-	-	0%
93291	1,311	2,033	64%	58	64	91%
93292 / 93670	1,019	1,574	65%	43	48	90%
93301	1	3	33%	-	-	0%
93501	265	379	70%	18	21	86%
93505	458	731	63%	24	24	100%
93510	81	150	54%	14	14	100%
93512 / 93513	14	18	78%	1	1	100%
93514	184	245	75%	9	10	0%
93516	76	112	68%	6	7	0%
93517	13	15	87%	2	3	0%
93518	23	44	52%	5	5	0%
93523	32	60	53%	4	4	0%
93527	67	88	76%	6	7	0%
93529	15	15	100%	3	3	0%
93532	39	61	64%	4	4	0%
93534	1,972	2,750	72%	153	178	0%
93535	2,722	4,117	66%	48	58	0%
93536	1,339	2,271	59%	37	44	0%
93543	320	473	68%	12	17	0%
93544	10	25	40%	-	-	0%
93546	147	182	81%	15	18	0%
93550	2,523	4,032	63%	128	138	0%
93551	816	1,535	53%	22	26	0%
93552	679	1,393	49%	6	7	0%
93553	39	67	58%	7	8	0%
93555 / 93558	834	1,120	74%	45	50	0%
93560	425	729	58%	21	24	0%
93561	481	695	69%	47	52	0%
93562	111	154	72%	2	3	0%
93591	217	326	67%	6	7	0%
93664	27	32	84%	2	2	0%
ZIP Codes with Possible Data Issues	455	665	68%	46	53	87%
<b>Total</b>	<b>250,402</b>	<b>360,787</b>	<b>69%</b>	<b>16,120</b>	<b>18,084</b>	<b>89%</b>

## Unique Residential and Small Business Customers more than 90 days and \$250+ in Arrears by ZIP Code

ZIP Code	Number of Unique Residential Customers who are: - more than 90 days in arrears - not enrolled in a payment plan - arrears of \$250+	Number of Unique Residential Customers who are: - more than 90 days in arrears - arrears of \$250+	Percent of Residential Customers who are more than 90 days and \$250+ in arrears and not enrolled in a payment plan	Number of Unique Small Business Customers who are: - more than 90 days in arrears - not enrolled in a payment plan - arrears of \$250+	Number of Unique Small Business Customers who are: - more than 90 days in arrears - arrears of \$250+	Percent of Unique Small Business Customers who are more than 90 days and \$250+ in arrears and not enrolled in a payment plan
90001	741	833	89%	68	85	80%
90002	289	328	88%	8	8	100%
90008	26	31	84%	-	-	0%
90022	1,068	1,236	86%	143	165	87%
90023	255	298	86%	29	34	85%
90032 / 91803	290	340	85%	36	37	97%
90038	15	20	75%	-	-	0%
90040	157	193	81%	18	21	86%
90043	130	170	76%	13	13	100%
90044	775	894	87%	29	31	94%
90045	16	16	100%	1	1	100%
90046	396	422	94%	31	33	94%
90047	337	400	84%	7	8	88%
90048	61	71	86%	4	4	100%
90056	108	140	77%	11	11	100%
90059	259	303	85%	7	8	88%
90061	174	208	84%	11	13	85%
90063	598	687	87%	45	47	96%
90066	64	67	96%	15	17	88%
90069	355	383	93%	52	59	88%
90201	1,571	1,841	85%	111	132	84%
90210	126	148	85%	26	28	93%
90211	105	120	88%	23	27	85%
90212	147	175	84%	16	18	89%
90220	806	989	81%	39	46	85%
90221	841	1,019	83%	72	81	89%
90222	533	644	83%	29	35	83%
90230	155	168	92%	19	23	83%
90232	101	107	94%	25	30	83%
90240	343	462	74%	22	26	85%
90241	711	864	82%	69	76	91%
90242	671	819	82%	29	31	94%
90245	87	97	90%	18	19	95%
90247	501	590	85%	42	44	95%
90248	44	51	86%	24	29	83%
90249	290	354	82%	82	88	93%
90250 / 90251	1,300	1,485	88%	96	110	87%
90254	102	112	91%	25	26	96%
90255	1,063	1,231	86%	159	184	86%
90260	427	479	89%	26	32	81%
90262	935	1,124	83%	71	84	85%
90265	126	149	85%	11	13	85%
90266	131	141	93%	19	21	90%
90270	423	487	87%	18	24	75%
90274	98	114	86%	9	9	100%
90275	178	214	83%	6	6	100%
90277	214	242	88%	26	29	90%
90278	257	299	86%	15	16	94%
90280	1,309	1,516	86%	143	155	92%
90290	69	83	83%	3	4	75%
90292	219	232	94%	1	1	100%
90301	685	832	82%	72	85	85%
90302	623	702	89%	55	63	87%
90303	476	562	85%	20	22	91%
90304	326	364	90%	38	41	93%
90305	303	385	79%	16	19	84%
90401	154	163	94%	40	44	91%
90402	68	71	96%	5	6	83%
90403	206	224	92%	18	20	90%
90404	254	284	89%	28	29	97%
90405	229	244	94%	31	35	89%
90501	178	209	85%	35	43	81%
90502	138	165	84%	27	28	96%
90503	242	273	89%	12	14	86%
90504	233	265	88%	16	17	94%
90505	221	259	85%	28	35	80%
90601	494	629	79%	43	49	88%
90602	449	553	81%	28	34	82%
90603	205	259	79%	5	8	63%
90604	511	609	84%	12	14	86%
90605	468	592	79%	36	43	84%
90606	370	482	77%	37	42	88%
90620	366	474	77%	23	23	100%
90621	436	542	80%	21	24	88%
90623	90	127	71%	2	2	100%
90630	320	398	80%	13	17	76%
90631	860	1,033	83%	80	88	91%
90638	364	443	82%	17	19	89%
90640	944	1,145	82%	98	113	87%
90650	1,119	1,389	81%	58	67	87%
90660	716	916	78%	77	85	91%
90670	165	218	76%	86	98	88%
90680	294	361	81%	46	52	88%
90701	128	166	77%	28	32	88%
90703	276	353	78%	34	36	94%
90704	60	72	83%	7	8	88%

**Unique Residential and Small Business Customers more than 90 days and \$250+ in Arrears by ZIP Code**

ZIP Code	Number of Unique Residential Customers who are: - more than 90 days in arrears - not enrolled in a payment plan - arrears of \$250+	Number of Unique Residential Customers who are: - more than 90 days in arrears - arrears of \$250+	Percent of Residential Customers who are more than 90 days and \$250+ in arrears and not enrolled in a payment plan	Number of Unique Small Business Customers who are: - more than 90 days in arrears - not enrolled in a payment plan - arrears of \$250+	Number of Unique Small Business Customers who are: - more than 90 days in arrears - arrears of \$250+	Percent of Unique Small Business Customers who are more than 90 days and \$250+ in arrears and not enrolled in a payment plan
90706	1,277	1,593	80%	86	98	88%
90710	23	28	82%	-	-	0%
90712	277	350	79%	12	14	86%
90713	193	250	77%	7	7	100%
90715	249	316	79%	10	11	91%
90716	162	191	85%	19	22	86%
90717	256	292	88%	15	18	83%
90720	147	187	79%	23	24	96%
90723	947	1,151	82%	78	92	85%
90731	23	29	79%	1	1	100%
90732	7	9	78%	-	-	0%
90740	99	110	90%	7	8	88%
90742 / 90743	16	16	100%	2	2	100%
90745	547	655	84%	46	49	94%
90746	299	388	77%	15	19	79%
90755	125	157	80%	27	30	90%
90802	817	922	89%	35	38	92%
90803	273	294	93%	18	20	90%
90804	627	727	86%	40	42	95%
90805	1,377	1,683	82%	88	104	85%
90806	614	709	87%	42	44	95%
90807	333	408	82%	19	25	76%
90808	235	274	86%	13	18	72%
90810	392	468	84%	20	23	87%
90813	1,070	1,204	89%	69	86	80%
90814	221	249	89%	13	14	93%
90815	240	290	83%	13	15	87%
91001	391	502	78%	16	17	94%
91006	221	275	80%	28	29	97%
91007	260	304	86%	16	19	84%
91008	11	11	100%	1	1	100%
91010	204	266	77%	22	24	92%
91011	65	82	79%	5	6	83%
91016	516	622	83%	50	53	94%
91020	69	79	87%	3	3	100%
91024	72	89	81%	5	7	71%
91030	231	265	87%	13	14	93%
91104	54	65	83%	4	5	80%
91107	96	113	85%	6	6	100%
91108	57	65	88%	6	7	86%
91214	87	107	81%	6	6	100%
91301	189	233	81%	17	24	71%
91302	276	342	81%	7	8	88%
91307	27	41	66%	-	-	0%
91311	51	67	76%	-	-	0%
91320	278	345	81%	25	28	89%
91321	368	469	78%	22	24	92%
91340	361	432	84%	56	67	84%
91342	13	17	76%	2	2	100%
91350	270	381	71%	25	28	89%
91351	474	585	81%	31	34	91%
91354	261	346	75%	-	-	0%
91355	341	420	81%	27	27	100%
91360	306	373	82%	5	8	63%
91361	168	203	83%	16	17	94%
91362	264	333	79%	41	45	91%
91377	78	104	75%	2	2	100%
91381	174	226	77%	5	5	100%
91384	173	245	71%	9	11	82%
91387	756	971	78%	8	9	89%
91390	178	239	74%	6	11	55%
91701	362	495	73%	14	15	93%
91702	109	150	73%	10	12	83%
91706	787	1,018	77%	94	104	90%
91708	175	233	75%	1	1	100%
91709	630	800	79%	17	18	94%
91710	918	1,261	73%	63	67	94%
91711	261	327	80%	9	12	75%
91722	423	539	78%	24	27	89%
91723	343	442	78%	26	39	67%
91724	316	416	76%	15	19	79%
91730	1,254	1,639	77%	95	110	86%
91731	360	439	82%	45	49	92%
91732	799	972	82%	61	71	86%
91733	551	634	87%	121	138	88%
91737	243	323	75%	3	3	100%
91739	409	561	73%	3	3	100%
91740	273	337	81%	45	51	88%
91741	189	251	75%	7	7	100%
91744	773	986	78%	61	73	84%
91745	448	554	81%	24	29	83%
91746	276	341	81%	54	62	87%
91748	353	438	81%	39	41	95%
91750	277	348	80%	12	17	71%
91752	443	652	68%	11	12	92%
91754	278	328	85%	29	29	100%

**Unique Residential and Small Business Customers more than 90 days and \$250+ in Arrears by ZIP Code**

ZIP Code	Number of Unique Residential Customers who are: - more than 90 days in arrears - not enrolled in a payment plan - arrears of \$250+	Number of Unique Residential Customers who are: - more than 90 days in arrears - arrears of \$250+	Percent of Residential Customers who are more than 90 days and \$250+ in arrears and not enrolled in a payment plan	Number of Unique Small Business Customers who are: - more than 90 days in arrears - not enrolled in a payment plan - arrears of \$250+	Number of Unique Small Business Customers who are: - more than 90 days in arrears - arrears of \$250+	Percent of Unique Small Business Customers who are more than 90 days and \$250+ in arrears and not enrolled in a payment plan
91755	169	197	86%	10	11	91%
91759	3	7	43%	-	-	0%
91761	789	1,047	75%	76	84	90%
91762	947	1,244	76%	87	96	91%
91763	566	725	78%	65	78	83%
91764	1,061	1,344	79%	20	22	91%
91765	273	373	73%	13	14	93%
91766	1,015	1,296	78%	68	79	86%
91767	815	1,013	80%	53	62	85%
91768	525	656	80%	40	45	89%
91769	-	-	0%	-	-	0%
91770	413	484	85%	44	46	96%
91773	274	353	78%	30	36	83%
91775	155	189	82%	5	5	100%
91776	286	334	86%	33	38	87%
91780	261	322	81%	28	28	100%
91784	175	227	77%	1	1	100%
91786	1,024	1,304	79%	87	104	84%
91789	212	262	81%	33	35	94%
91790	502	655	77%	31	38	82%
91791	404	520	78%	11	11	100%
91792	424	528	80%	13	14	93%
91801	549	643	85%	37	41	90%
92210	36	56	64%	4	5	80%
92211	250	357	70%	18	25	72%
92220	43	50	86%	-	-	0%
92223	661	924	72%	19	20	95%
92225	434	569	76%	18	18	100%
92230	77	99	78%	3	3	100%
92234	998	1,431	70%	54	62	87%
92240	1,246	1,670	75%	31	33	94%
92241	66	93	71%	1	2	50%
92252	203	248	82%	1	2	50%
92256	82	102	80%	3	5	60%
92258	15	17	88%	6	7	86%
92260	530	711	75%	67	84	80%
92262	615	787	78%	43	56	77%
92264	335	436	77%	22	26	85%
92267	5	7	71%	-	-	0%
92268	9	11	82%	-	-	0%
92270	189	271	70%	7	8	88%
92277	442	565	78%	19	24	79%
92282	32	45	71%	1	1	100%
92284	489	634	77%	26	29	90%
92285	37	48	77%	-	1	0%
92301	950	1,248	76%	10	11	91%
92305	6	7	86%	1	1	100%
92307	873	1,171	75%	17	20	85%
92308	698	931	75%	26	30	87%
92309	12	14	86%	1	1	100%
92311	930	1,179	79%	33	40	83%
92313	206	270	76%	9	11	82%
92316	365	489	75%	24	26	92%
92317	6	6	100%	5	5	100%
92320	97	134	72%	5	6	83%
92321	13	14	93%	3	3	100%
92322	22	29	76%	-	-	0%
92324	59	81	73%	3	3	100%
92325	180	212	85%	5	5	100%
92327	17	20	85%	-	-	0%
92328	1	2	50%	-	-	0%
92335	1,699	2,163	79%	87	100	87%
92336	1,222	1,781	69%	12	13	92%
92337	492	703	70%	6	7	86%
92339	15	19	79%	-	-	0%
92341	6	7	86%	-	-	0%
92342	104	155	67%	6	7	86%
92344	276	411	67%	1	3	33%
92345	1,495	2,017	74%	95	105	90%
92346	954	1,301	73%	17	20	85%
92347	9	10	90%	3	3	100%
92352	111	124	90%	7	7	100%
92354	267	344	78%	9	10	90%
92356	114	153	75%	5	6	83%
92358	15	17	88%	-	-	0%
92359	139	179	78%	5	5	100%
92363	27	33	82%	-	-	0%
92365	50	64	78%	7	7	100%
92368	19	23	83%	3	3	100%
92371	332	435	76%	5	5	100%
92372	74	105	70%	-	-	0%
92373	404	532	76%	28	30	93%
92374	564	752	75%	28	34	82%
92376	1,630	2,192	74%	82	101	81%
92377	306	462	66%	2	2	100%
92378	10	10	100%	1	1	100%

Unique Residential and Small Business Customers more than 90 days and \$250+ in Arrears by ZIP Code

ZIP Code	Number of Unique Residential Customers who are: - more than 90 days in arrears - not enrolled in a payment plan - arrears of \$250+	Number of Unique Residential Customers who are: - more than 90 days in arrears - arrears of \$250+	Percent of Residential Customers who are more than 90 days and \$250+ in arrears and not enrolled in a payment plan	Number of Unique Small Business Customers who are: - more than 90 days in arrears - not enrolled in a payment plan - arrears of \$250+	Number of Unique Small Business Customers who are: - more than 90 days in arrears - arrears of \$250+	Percent of Unique Small Business Customers who are more than 90 days and \$250+ in arrears and not enrolled in a payment plan
92382	89	103	86%	1	2	50%
92389	7	7	100%	-	-	0%
92391	29	30	97%	-	-	0%
92392	1,245	1,720	72%	27	30	90%
92394	709	987	72%	8	8	100%
92395	947	1,213	78%	45	47	96%
92397	61	68	90%	5	5	100%
92398	26	39	67%	-	1	0%
92399	634	820	77%	24	30	80%
92401	84	103	82%	23	25	92%
92404	1,850	2,404	77%	44	47	94%
92405	895	1,136	79%	36	40	90%
92407	1,298	1,740	75%	23	27	85%
92408	281	364	77%	84	97	87%
92410	1,330	1,668	80%	76	83	92%
92411	517	673	77%	14	18	78%
92501	24	33	73%	2	2	100%
92503	192	284	68%	2	2	100%
92504	92	138	67%	2	4	50%
92506 / 90507	136	180	76%	4	4	0%
92508	63	88	72%	4	4	100%
92509	1,074	1,476	73%	45	51	88%
92518	5	6	83%	1	1	100%
92530	1,169	1,540	76%	55	63	87%
92532	416	620	67%	5	6	83%
92536	16	19	84%	-	1	0%
92543	1,022	1,363	75%	28	31	90%
92544	1,034	1,412	73%	28	32	88%
92545	704	1,050	67%	7	8	88%
92548	129	170	76%	4	5	80%
92549	51	57	89%	2	3	67%
92551	544	750	73%	4	4	100%
92553	1,641	2,167	76%	69	77	90%
92555	336	488	69%	-	-	0%
92557	1,104	1,506	73%	17	18	94%
92562	731	1,045	70%	29	37	78%
92563	724	1,061	68%	12	13	92%
92567	154	208	74%	4	4	100%
92570	946	1,296	73%	32	36	89%
92571	933	1,323	71%	12	14	86%
92582	319	465	69%	11	12	92%
92583	771	1,026	75%	34	40	85%
92584	579	882	66%	5	7	71%
92585	265	390	68%	5	5	100%
92586	256	378	68%	6	8	75%
92587	287	405	71%	7	7	100%
92590	62	82	76%	53	60	88%
92591	458	640	72%	21	26	81%
92592	624	862	72%	8	8	100%
92595	493	725	68%	9	10	90%
92596	312	454	69%	2	3	67%
92602	186	226	82%	4	4	100%
92603	87	106	82%	1	1	100%
92604	147	181	81%	6	6	100%
92606	174	219	79%	11	12	92%
92610	69	90	77%	1	1	100%
92612	327	374	87%	7	7	100%
92614	269	314	86%	23	25	92%
92617	7	8	88%	-	-	0%
92618	505	589	86%	38	39	97%
92620	356	436	82%	3	3	100%
92625	49	55	89%	10	10	100%
92626	512	598	86%	44	52	85%
92627	558	627	89%	64	71	90%
92630	504	611	82%	39	44	89%
92637	50	62	81%	3	3	100%
92646	337	384	88%	10	13	77%
92647	708	803	88%	27	38	71%
92648	417	467	89%	19	24	79%
92649	268	296	91%	26	31	84%
92651	164	175	94%	26	30	87%
92653	129	141	91%	21	27	78%
92655	68	88	77%	4	4	100%
92656	372	481	77%	2	3	67%
92657	72	86	84%	1	1	100%
92660	249	290	86%	14	15	93%
92661	24	26	92%	2	2	100%
92663	203	226	90%	21	24	88%
92676	14	17	82%	1	1	100%
92677	92	106	87%	1	1	100%
92678	8	10	80%	-	-	0%
92679	94	134	70%	-	-	0%
92683	588	701	84%	78	88	89%
92688	287	361	80%	10	13	77%
92691	237	306	77%	18	20	90%
92692	143	180	79%	3	3	100%

Unique Residential and Small Business Customers more than 90 days and \$250+ in Arrears by ZIP Code

ZIP Code	Number of Unique Residential Customers who are: - more than 90 days in arrears - not enrolled in a payment plan - arrears of \$250+	Number of Unique Residential Customers who are: - more than 90 days in arrears - arrears of \$250+	Percent of Residential Customers who are more than 90 days and \$250+ in arrears and not enrolled in a payment plan	Number of Unique Small Business Customers who are: - more than 90 days in arrears - not enrolled in a payment plan - arrears of \$250+	Number of Unique Small Business Customers who are: - more than 90 days in arrears - arrears of \$250+	Percent of Unique Small Business Customers who are more than 90 days and \$250+ in arrears and not enrolled in a payment plan
92701	657	749	88%	51	61	84%
92703	558	653	85%	66	72	92%
92704	684	805	85%	55	69	80%
92705	463	550	84%	114	124	92%
92706	400	472	85%	17	21	81%
92707	654	776	84%	49	59	83%
92708	331	380	87%	41	47	87%
92780	641	754	85%	30	35	86%
92782	223	273	82%	1	1	100%
92801 / 92804	157	195	81%	7	8	88%
92821	288	357	81%	32	34	94%
92823	16	22	73%	1	1	100%
92831	409	495	83%	50	52	96%
92832	349	424	82%	34	40	85%
92833	459	559	82%	13	14	93%
92835	182	230	79%	4	6	67%
92840	416	520	80%	28	34	82%
92841	287	347	83%	28	31	90%
92843	307	377	81%	66	70	94%
92844	176	208	85%	21	24	88%
92845	80	103	78%	6	6	100%
92860	252	380	66%	16	16	100%
92861	21	32	66%	1	1	100%
92865	181	234	77%	24	27	89%
92866	162	207	78%	12	13	92%
92867	401	478	84%	50	57	88%
92868	333	417	80%	23	25	92%
92869	252	310	81%	13	17	76%
92870	396	499	79%	29	36	81%
92879	746	950	79%	25	27	93%
92880	607	1,003	61%	12	15	80%
92881	346	477	73%	11	12	92%
92882	806	1,025	79%	34	41	83%
92883	341	491	69%	3	3	100%
92886	242	314	77%	8	9	89%
92887	111	147	76%	3	3	100%
93001	306	347	88%	46	56	82%
93003	439	494	89%	93	97	96%
93004	277	317	87%	7	8	88%
93010	366	426	86%	25	29	86%
93012	193	233	83%	20	22	91%
93013	93	103	90%	3	3	100%
93015	169	203	83%	10	10	100%
93021	256	315	81%	17	19	89%
93022	58	71	82%	4	4	100%
93023	192	232	83%	27	31	87%
93030	629	711	88%	96	103	93%
93033	596	662	90%	58	66	88%
93035	234	263	89%	12	13	92%
93036	446	522	85%	25	28	89%
93040	20	26	77%	1	1	100%
93041	269	293	92%	14	15	93%
93060	330	391	84%	23	28	82%
93063	441	612	72%	29	30	97%
93065	660	850	78%	36	47	77%
93066	24	29	83%	4	5	80%
93067	5	6	83%	-	-	0%
93101	237	264	90%	28	33	85%
93103	123	135	91%	15	15	100%
93105	121	133	91%	18	19	95%
93108	42	52	81%	3	3	100%
93109	59	70	84%	1	2	50%
93110	71	80	89%	-	1	0%
93111	76	82	93%	4	4	100%
93117	224	244	92%	22	25	88%
93202	74	89	83%	3	3	100%
93205	70	80	88%	-	-	0%
93208	1	1	100%	-	-	0%
93215	617	807	76%	50	54	93%
93218	19	23	83%	-	-	0%
93219	98	128	77%	7	9	78%
93221	270	365	74%	14	16	88%
93222	28	31	90%	1	3	33%
93223	174	217	80%	10	10	100%
93225	100	115	87%	8	10	80%
93227	53	75	71%	-	-	0%
93230	1,320	1,703	78%	51	55	93%
93235	78	103	76%	3	3	100%
93238	23	25	92%	3	5	60%
93240	108	137	79%	3	4	75%
93244	15	18	83%	1	1	100%
93247	308	417	74%	17	21	81%
93250	63	80	79%	1	1	100%
93255	7	9	78%	1	1	100%
93256	85	107	79%	9	9	100%
93257 / 93258	1,508	1,959	77%	71	79	90%



**Unique Residential and Small Business Customers more than 90 days and \$250+ in Arrears by ZIP Code**

ZIP Code	Number of Unique Residential Customers who are: - more than 90 days in arrears - not enrolled in a payment plan - arrears of \$250+	Number of Unique Residential Customers who are: - more than 90 days in arrears - arrears of \$250+	Percent of Residential Customers who are more than 90 days and \$250+ in arrears and not enrolled in a payment plan	Number of Unique Small Business Customers who are: - more than 90 days in arrears - not enrolled in a payment plan - arrears of \$250+	Number of Unique Small Business Customers who are: - more than 90 days in arrears - arrears of \$250+	Percent of Unique Small Business Customers who are more than 90 days and \$250+ in arrears and not enrolled in a payment plan
93260	8	10	80%	-	-	0%
93261	27	31	87%	-	-	0%
93265	51	71	72%	2	2	100%
93267	115	137	84%	3	4	75%
93270	83	105	79%	6	6	100%
93271	36	43	84%	3	5	60%
93272	51	69	74%	-	-	0%
93274	1,509	2,055	73%	44	51	86%
93277	1,175	1,522	77%	34	36	94%
93283	39	48	81%	-	-	0%
93285	65	71	92%	1	1	100%
93286	163	205	80%	6	6	100%
93287	2	4	50%	-	-	0%
93291	1,010	1,328	76%	39	43	91%
93292 / 93670	823	1,078	76%	31	34	91%
93301	-	-	0%	-	-	0%
93501	198	238	83%	10	11	91%
93505	386	494	78%	15	15	100%
93510	80	112	71%	8	8	100%
93512 / 93513	6	8	75%	1	1	100%
93514	129	147	88%	8	8	100%
93516	58	70	83%	4	5	80%
93517	6	6	100%	1	1	100%
93518	18	26	69%	1	1	100%
93523	33	42	79%	2	2	100%
93527	45	50	90%	2	3	67%
93529	11	11	100%	1	1	100%
93532	32	45	71%	2	2	100%
93534	1,433	1,826	78%	114	136	84%
93535	2,071	2,868	72%	30	37	81%
93536	1,178	1,639	72%	25	28	89%
93543	266	337	79%	6	9	67%
93544	13	18	72%	-	-	0%
93546	104	111	94%	7	10	70%
93550	1,960	2,638	74%	83	91	91%
93551	750	1,114	67%	10	13	77%
93552	641	950	67%	5	6	83%
93553	31	47	66%	2	3	67%
93555 / 93588	581	707	82%	35	40	88%
93560	350	461	76%	11	13	85%
93561	349	409	85%	24	28	86%
93562	89	107	83%	-	1	0%
93591	173	234	74%	5	6	83%
93664	14	15	93%	-	-	0%
ZIP Codes with Possible Data Issues	312	404	77%	24	26	92%
<b>Total</b>	<b>172,134</b>	<b>218,680</b>	<b>79%</b>	<b>10,713</b>	<b>12,194</b>	<b>88%</b>

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
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Revised 70931-E	Table of Contents	Revised 70709-E
Revised 70932-E	Table of Contents	Revised 67388-E



Schedule SC  
Service Connection Charge

Sheet 1

APPLICABILITY

Applicable to Non-Residential customers.

TERRITORY

Within the entire territory served.

RATE

Non-Residential Service Connection Charge – ..... \$30.00  
At-Pole Service Connection Charge – ..... \$173.00

SPECIAL CONDITIONS

1. The Service Connection Charge provided herein may be charged each time an account is established or reconnected for non-payment of a bill. Establishment means each time an account is opened, including a turn-on of electric service or a change of name which requires a meter reading that may be obtained remotely. (D)

Non-Residential Service Connection Charge: These charges apply to connections of non-residential service except for connection of service directly at the pole.

At-Pole Service Connection Charge: This charge applies to connections of non-residential service directly at the pole when there is an access problem or some other customer issue where service needs to be connected at the pole.

2. Service Connection Charges are not applicable to submetered tenants of SCE customers.

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Rule 9  
RENDERING AND PAYMENT OF BILLS

Sheet 3

(Continued)

E. Budget Billing Plan. (Continued) (P)

5. When a settlement bill is rendered, any amounts due for usage over and above plan amounts already paid are then due and payable in accordance with SCE's filed tariff schedules; any credit for plan amounts paid in excess of actual usage will be applied to the customer's next regular monthly bill or will be refunded by check if so requested by the customer. (P)
6. Budget Billing Plan amounts will be reviewed and may be adjusted if there is a 20% or greater difference (10% or greater for small commercial and lighting customers) from the current Budget Billing Plan payment amount and the newly calculated Budget Billing Plan payment amount based on such review. (P)
7. Participants may be removed from the Plan if, in the opinion of SCE, the conditions of service or basis on which credit was originally established have materially changed. If a customer is removed from the Budget Billing Plan, a settlement bill will be rendered as described in Section E.5. above. (P)

For customers with a minimum of 365 days of service, the following condition applies:

The Budget Billing Plan amount is based on the daily average bill amount in dollars, multiplied by 365 and divided by 11 months. The Budget Billing Plan amount will be rounded up or down to the nearest \$1.00. (P)

For customers with less than 365 days of service or customers electing the Budget Billing Plan at the time service begins at a specific service address, the following condition applies: (P)

The Budget Billing Plan amount will be based at one-half of the deposit base amount determined in accordance with the provisions of Section A.1 of Rule 7, Deposits, established on the account. (P)

F. Late Payment Charge. (D)

A Late Payment Charge of 0.7% may be applied to the total unpaid balance of a domestic or non-domestic Customer Account if the customer's payment is not received by the date indicated on the Customer Account Bill or Summary Bill.

Domestic California Alternate Rates for Energy (CARE) customers are exempt from application of the Late Payment Charge.

(Continued)

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