

# Utility Justice

## Training Manual for Advocates

A Guide to Keeping the Lights On



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This manual and additional attachments can be found online at [www.turn.org/policyvoice/trainings/](http://www.turn.org/policyvoice/trainings/). If you have more questions, you can also go to TURNs Frequently Asked Energy Questions at: <http://www.turn.org/energy-faq/>

# Introduction

## Utility Service As A Basic Human Right

Access to affordable and reliable electricity and gas services plays a huge part in our everyday lives. From the time we wake up until we go to sleep, many of our activities throughout the day are dependent upon utilities. Turning on lights in the evening, charging our phones, cooking meals, showering with hot water, cooling or warming our homes—**requires energy**.

**Despite the necessity of energy, universal access is far from realized. Utility** bills for gas and electricity can consume up to 41 percent of income for very poor households in California.<sup>1</sup> Since 2009, utility shutoffs have resulted in the deaths of at least 11 California residents—children and adults, all of them Latino or Black—due to fires caused by candles, extension cords, or carbon monoxide poisoning from portable heaters. Shutoffs have increased by almost 75 percent in the last 7 years. In 2017, there were over 886,000 shutoffs in California. This is the equivalent of all the households in San Francisco, Anaheim and San Diego. This amounts to about 3 million people in the dark—most of whom are children.

**As many Californians face an increasingly high cost of living and stagnating wages, they look for ways to save money and reduce their utility bills.** They cut back on their spending, make sure to turn off all the lights in the rooms not being used, and in many cases, they make difficult tradeoffs about which bills to pay first or give up food and medicine in order to pay their utility bills.

Unfortunately, when customers fall behind on their utility bills, utility companies shut them off. To make matters worse, people without power will resort to unsafe practices, which result in unsafe living conditions for themselves and their neighbors. There must be a better solution to ensure access to life-sustaining utility service.

The California Public Utilities Commission (CPUC), which regulates privately owned utilities, is responsible for assuring that California utility customers have **safe** and **reliable** utility service at **reasonable rates**. The CPUC has failed to take strong action to ensure access to energy and reduce utility shutoffs, despite the fundamental need for energy that we all require.

**Where the CPUC has fallen short, TURN and other consumer and grassroots organizations have stepped in to demand utility service as a basic human right!**

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<sup>1</sup> Evergreen Economics, "Needs Assessment for the Energy Savings Assistance and the California Alternate Rates for Energy Programs." prepared for the California Public Utilities Commission, December 16 (2013).

## About TURN

TURN – The Utility Reform Network fights on behalf of utility customers at the California Public Utilities Commission (CPUC). We are a consumer protection nonprofit organization representing the rights of regulated energy and telecommunication companies' customers in California for 45 years.

### The mission of TURN is to:

- Represent the interests of residential and small business utility and telecommunications customers in decision-making processes at the CPUC and other regulatory agencies.
- Educate consumers, policymakers and the general public on policy proposals that impact public safety, system reliability, monthly bills and customer service.
- Reach out to underserved communities so that people most impacted by CPUC decisions have the opportunity to participate in the decision-making process.

### Our Strategy

TURN deploys its team of staff attorneys, community organizers, legislative analysts, and media experts to fight for — **the most green for the least green** — the cleanest energy and the best broadband/phone service at the lowest prices to consumers. We work together to:

- Expand the power of diverse grassroots communities to control their own destiny. We mobilize low-income communities of color throughout California.
- Build coalitions that strategically align human, financial, and messaging resources. We bring together economic, environmental and consumer justice movements.
- Win concrete policy outcomes and institutional changes that impact communities. We fight for and win renewable energy and efficiency policies that are affordable.
- Define the terms of political debate to leverage future wins. We shape compelling policy messages for broadcast, print and social media.

## The End Shutoffs Campaign

Led by TURN, the End Shutoffs Campaign is a research, communication, and action campaign designed to urge public health, utility regulatory, and elected officials to adopt goals and implement policies that address the public health and housing impacts of energy insecurity, especially utility shutoffs. The campaign primarily targets Californians who receive utility service from investor-owned utility companies regulated by the California Public Utilities Commission (CPUC).



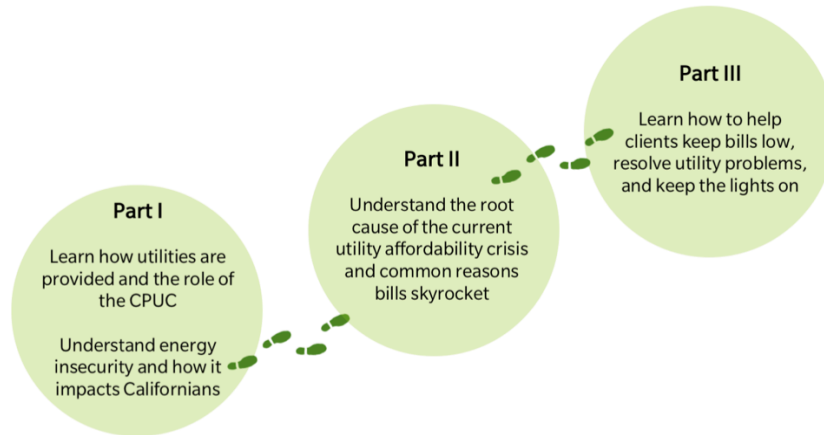
In 2017, utility energy service was terminated for 886,000 California households—representing about 3 million people, mostly children—a 73% increase from the 547,000 households who were shut off in 2010. Utility shutoffs threaten the health of low-income families, communities of color, people for whom English is a second language, as well as individuals who are elderly, physically disabled, or have serious medical conditions. The loss of basic electricity or gas service causes tremendous hardship, undue stress, and risks to health and housing stability.

In order to achieve our ultimate goals of reducing energy insecurity and utility shutoffs, the End Shutoffs Campaign engages in **5 key strategies**:

- **Research and Data.** By measuring and reporting data on energy insecurity and shutoffs, we make a statement that the issue is important and are able to track our progress. The campaign researches and reports on the burden of energy insecurity and utility disconnections across the state, including examining disparities for communities of color and low-income communities.
- **Organize and Build Power.** The knowledge, people power, and leadership of the communities most impacted by energy insecurity and utility shutoffs are critical to the success of our campaign. TURN has partnered with grassroots organizations across the state to mobilize low-income communities of color to share their stories and lead our advocacy efforts. TURN, these core grassroots partners, and a growing number of other public agencies, nonprofit stakeholders, and Californians make up the Utility Justice Coalition, the foundation of the campaign's advocacy efforts.
- **Advocacy and Litigation.** The campaign fights to pass and support implementation of state legislation to reduce energy insecurity and protect Californians from shutoffs.
- **Spread the Word.** Raising awareness of the prevalence and impacts of energy insecurity and utility shutoffs is critical to making the case for change. TURN and our partners share stories and data through social media, op-eds, and public hearings.
- **Provide Relief to Californians Who are Suffering.** TURN provides direct support to energy insecure clients as well as training service providers across the state to provide similar support to their clients.

## How To Use This Training Manual

The goal of this manual is to provide community advocates and service providers throughout California the information tools they need to help individuals and families manage their utility costs and avoid an electric or gas shutoff. This manual primarily addresses the rights of customers of electric and gas companies. It is divided into a number of sections and subsections, all listed in the Table of Contents, to help you find what you need quickly. The electronic version of this manual allows users to click on a header in the table of contents that links directly to the subject listed. The manual is divided into 3 sections:



**Part I** provides an overview of **how utility services are provided and how utilities are regulated** in California, summarizing the key stakeholders and the roles they play. It also introduces **energy insecurity**, what it is, how we measure it, how it **affects our health**, and the role it plays for Californians facing an **increasingly expensive and constrained housing market**.

**Part II** examines **why utility bills are so high**. We outline common reasons bills become too high for Californians to pay—ranging from general unaffordability to unfair and illegal practices by utility companies and landlords. This section will help you understand the different circumstances that can lead to utility bill problems or shutoffs and feel comfortable explaining these challenges and their root causes.

**Part III** provides tools and **approaches for helping your clients** conserve energy, register for discount programs, access assistance with bills, negotiate affordable payment plans, fight against the utility companies when they break the rules, identify utility complaints, and help clients keep the lights on.

The accompanying flash drive and TURN [website](#) contain copies of training materials for future use, including:

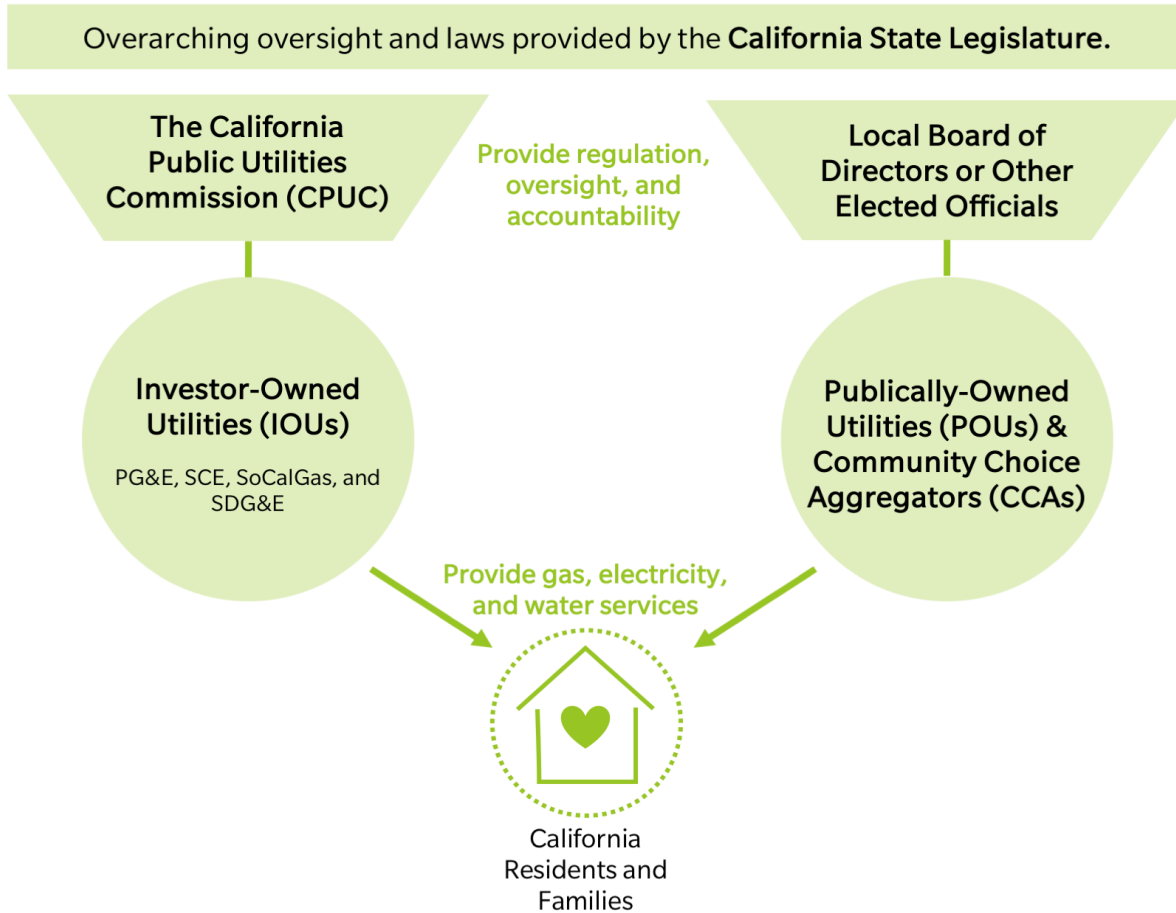
- Sample intake form
- Sample scripts for how to communicate with the utilities
- Utility Authorization Form
- Fact sheets

# PART I. Utilities and Energy Insecurity in California

## How does California Provide and Regulate Utilities?

In order to best support residents facing utility problems or advocate for improvements to our current utility system, it is important to understand the various stakeholders involved in providing and overseeing utilities as well as their roles.

Who **provides** utilities and who is responsible for **oversight**?



## Utility Companies in California

There are two categories of electric and gas companies in California. The first category are usually called "[investor-owned utilities](#)" or "IOUs". These are companies such as Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), Southern California Gas Company (SoCalGas), and San Diego Gas & Electric Company (SDG&E). IOUs are regulated by the California Public Utilities Commission (CPUC).

The second category of utility companies includes municipal utilities, or more broadly, "[publicly-owned utilities](#)" or "POUs" and [Community Choice Aggregators](#) (CCAs), which are subject to local public control and regulation. Examples include the Los Angeles Department of Water and Power (LADWP), Sacramento Municipal Utility District (SMUD), and the Modesto Irrigation District (MID). The CPUC has no jurisdiction over these utilities. Instead, they are governed by a local Board of Directors or other elected officials. Because of this, it is difficult to directly help customers with their complaints if they are served by publicly owned utilities. Customers of publicly-owned utilities should contact their municipal utility office, local city council member, or their Mayor's office to lodge their complaints. Propane (bottled) gas and oil companies are not considered utility companies and are not regulated by the CPUC.

## The Role of the California Public Utilities Commission

The California Public Utilities Commission (CPUC) is a state agency created by constitutional amendment to regulate investor-owned utilities in the state of California, including telecommunications, electric, natural gas, water, railroad, rail transit, and passenger transportation, in addition to authorizing video franchises. The CPUC is responsible for assuring that California utility customers have **safe, reliable** utility service at **reasonable rates**, protecting utility customers from fraud and promoting the health of California's economy.

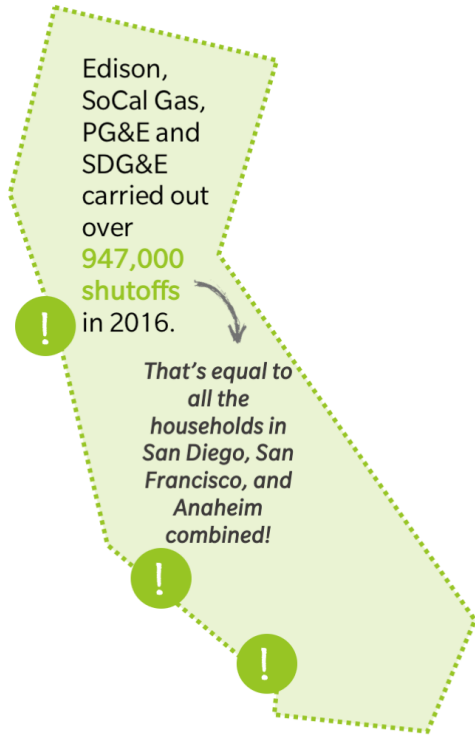
The Commission is comprised of a five-member board including the President of the Commission. Its members are appointed by the Governor and serve six-year staggered terms. Commissioners make all policy decisions, usually meeting twice a month to vote on issues noted on a public agenda. The CPUC headquarters are in San Francisco with field offices in Los Angeles and Sacramento. The CPUC holds public hearings, meetings, and workshops throughout the state. Because the CPUC regulates utility services in California, consumer advocates will often need to turn to the CPUC to resolve complaints or to effect positive policy changes.



# Energy Insecurity Impacts on Health and Housing

## Energy Insecurity

When basic energy needs are **out of reach** for families.



### The 3 Parts of Energy Insecurity<sup>4</sup>



**Bills Beyond Reach.** Families struggling to pay high energy bills also are faced with rising housing costs, forcing them to make difficult tradeoffs between utilities and rent, food, and healthcare.



**Poor Quality Housing.** Due to the **persistent legacy of discriminatory housing policies**, low income families of color are more likely to live in substandard housing with faulty heating or cooling and poor insulation that is unhealthy and unsafe and demands higher utility bills.



**Desperation.** Families are forced to tolerate unsafe temperatures or alternative heating or lighting, like stoves or candles to live without lights, heat or cooling.

Energy bills are a major concern for California families just like with **housing** and **food**. Even with utility discount programs, our elders, low-income families, and people of color are left behind.



**3.9 million low-income households** in California –over two-thirds – spend more than 30% of their income on housing.<sup>1</sup>



**4.1 million low-income adults** in California – about 2 out of 5– are unable to afford enough food.<sup>2</sup>



**3.3 million low-income households** in California – about 2 out of 3– are energy insecure.<sup>3</sup>

Energy Insecurity threatens the **health** and **safety** of low income families, especially **children** and people who are **medically vulnerable**.

### Respiratory Illness

An especially cold, hot or humid house as well as related mold can cause or trigger respiratory illnesses like asthma or bronchitis.<sup>5</sup>



### Heat and Fire Risks

Poor households and the elderly are more likely to “sweat it out,” risking heat-related illness like heat stroke during extreme heat.<sup>7</sup> Also, candles, space heaters, and extension cords used to compensate for have resulted in fire-related injuries and death.<sup>8</sup>



### Life-Support & Chronic Illness

A shutoff can threaten lives of people on life-support equipment like oxygen, dialysis machines, asthma nebulizers or electric wheelchairs. Others are left unable to refrigerate medications like insulin.

### Hunger

People consume fewer calories and lose weight during cold months when forced to choose spending money energy over food, known as the “heat or eat” dilemma.<sup>9</sup>



### Early Childhood Health and Development

Children in energy insecure homes are more likely to be in poorer health, to have been hospitalized, and to be at risk for developmental delays.<sup>6</sup>



### Stress

Families who worry more often about their home energy bills have higher levels of stress, which can increase the risk of illness, and physical and emotional exhaustion.<sup>10</sup>



### Displacement

Forced to choose between paying the rent or mortgage or paying a utility bill, families are put at risk of displacement through an eviction or foreclosure. Utility debt can even trigger a tax lien to be placed on the home, which can lead to a foreclosure. For families using Section 8 vouchers or living in other subsidized housing, a utility shutoff can mean an eviction and a loss of affordable housing benefits permanently.

### Homelessness

For families who are homeless, unpaid debt can stand in the way of leaving the shelter or the street and moving into stable housing.

### Landlord Harassment

Although illegal, it's not uncommon for landlords to take advantage of tenants by coercing tenants into paying outstanding bills of previous tenants, using tenant electricity for personal or shared spaces, or circumventing rent stabilization through inflated utility fees.

### Housing Quality and Safety

Unable to establish utility service elsewhere, utility debt can trap families who want to leave poor quality or unsafe housing. Renters with physical housing issues may be hesitant to raise these concerns to their landlord for fear of an eviction or other retaliation. Additionally, renters often lack the authority to make energy efficiency upgrades, which could lower their monthly utility bill.

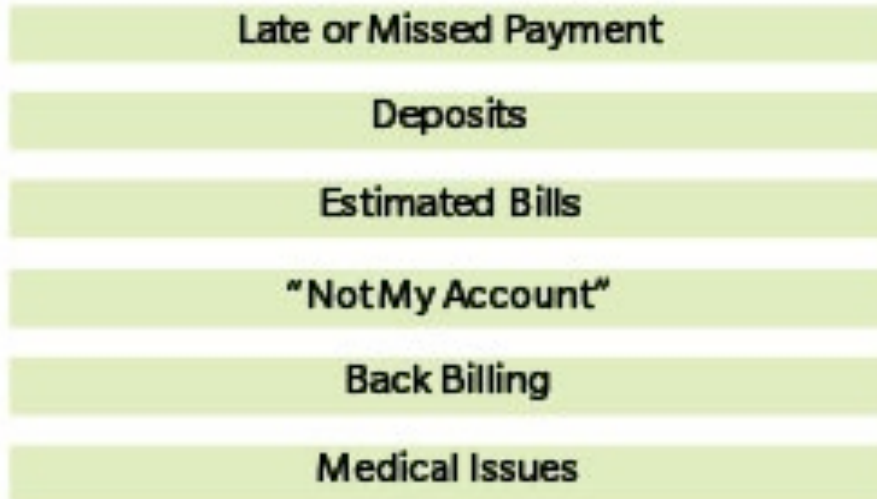
In a state where housing costs are already high, energy insecurity **makes it even harder to find and keep housing**.

*For sources, see appendix.*

## **PART II. The Crisis of Utility Affordability**

### **Common Reasons Why Utility Bills Skyrocket**

#### **Most Common Reasons for a High Bill**



#### **Late or Missed Payments**

Many utility customers think they can pay their utility bills after the due date listed on the bill or make partial payments from month to month in an attempt to catch up. It is also not unusual to hear a customer consider the partial payments as his or her payment plan because they feel that as long as they are paying something it will be enough to keep the service on. Some utility companies allow customers to carry large balances on their bills for months at a time, especially customers who have medical issues. This results in high and unaffordable monthly energy bills.

However, as the large balance accumulates, a shutoff notice will most likely be sent to the customer requesting payment of the entire past due balance. Out of desperation, many people will agree to a payment plan that may be unaffordable and continue to place a financial burden on a person who will still be unable to pay the bill.

Late or missed payments can also result in additional charges such as a deposit that makes the bill even higher. If a person gets shut off, they may also be required to pay a reconnection fee in addition to an unaffordable payment before they are reconnected. Any bill paid after the due date listed on the bill is considered late and can trigger a shutoff notice if the bill is not paid in full.

## Deposits

Utility companies may require deposits when a new customer is setting up service, or when an existing customer has been disconnected for non-payment and is seeking to reconnect service. Utilities may also require a deposit from an existing customer with a history of late payments, unless the customer participates in a low-income rate assistance program such as CARE and FERA. CARE/FERA customers cannot be charged a deposit for late payments but can be charged a deposit if their service is disconnected for non-payment of bills.

Deposits can add several hundred dollars to a bill. Customers are generally asked to pay twice the average monthly bill as estimated by the utility as a deposit on the account. For example, if a person's average monthly bill is \$100, the deposit will be at least \$200. For a person or family whose average bill is \$200, the deposit will be at least \$400. Low-income customers may be able to spread deposit payments over several months and should ask the utility for a deposit payment plan if needed.

The utilities can require any residential customers to pay a deposit after being disconnected. Utilities can also require customers who are not on CARE or FERA to pay a deposit for late payment of bills. In either case, the deposit is calculated at twice the average monthly bill. For CARE or FERA customers:

- For deposits equal to or less than \$150, customers should be offered up to three months to pay, and
- For deposits greater than \$150, customers should be offered up to six months to pay.

But remember, you can always ask for payments to be spread over a longer period of time!

## Estimated Bills

There are several reasons why the utility may estimate a customer's bill and in some cases, this can result in a high bill.

Analog meters: If a customer has an analog meter, their meter is manually read one month and estimated the next based on his/her historical usage data. If the estimated bill is higher or lower than actual usage, it will be corrected the next time the meter is manually read by a technician. If there are adjustments to the estimated bill, a customer can end up with either a credit or a higher bill for the corrected amount.

Additionally, customers who choose to keep their analog meter because they do not want a smart meter must pay opt-out fees. Not paying this fee will result in having an outstanding balance on a bill and the utility company can shut off a customer who does not pay this fee. For PG&E, SCE and SDG&E, non-CARE customers must pay a one-time fee of \$75 and \$10 a month for three years. CARE customers pay a one-time fee of \$10 and \$5 a month.

**Smart meters can be shut off remotely without any in-person visits.**

**This is likely to increase shutoffs.**

Please note: Customers of SoCal Gas who are also customers of Southern California Edison (SCE) have to pay this fee twice because they get gas from SoCal Gas and electricity from SCE).

Meter access: If the utility company cannot read the meter because the meter is not accessible or because the customer refuses to allow the utility technician to read the meter, the usage will be estimated based on the customer's past usage at that address and/or the usage of similar customers in that area.

Defective Meter: The utility may also estimate a customer's bill if the meter is not transmitting a customer's usage data accurately or if the meter is defective. This applies to the analog meter or a smart meter that the utility company may believe is not working properly.

Always check to see if the bill has been estimated. This information can be found in the monthly statement. You can dispute a billing estimate by looking at the usage comparison on the bills. You might be able to prove that there has been a billing error, especially if the bill is unusually high. This is discussed further in the section on back billing and meter error. The key point is that the utility can backbill a customer for amounts not included in an "estimated bill" for any period of time if the estimate is caused by an inaccessible meter or any other cause "within the control of the customer." The utility can only backbill for three months due to meter error or other utility problems, as discussed in more detail in the "Back billing" section below.

## Not My Account

It is not unusual to hear from customers who have high bills because:

- They moved and received a bill from a previous address.
- They are billed for a roommate's bill at the current address or from a previous address
- They moved and were asked or coerced into paying the previous tenant's or landlord's unpaid bill when they moved into a new residence.

Bills from a previous address: When a customer sets up new service or re-establishes service at a different address they could be asked to pay any outstanding bills before the utility will turn on service. Alternatively, the customer's first bill may also reflect these charges. **The utility has the right to ask for payment for any unpaid balances from any person 18 years or older who benefitted from the energy use.**

Paying the roommate's or account holder's bill: Although a person signs an application for service and receives a bill in their name, all adults over 18 living at the same address are responsible for the bill. For example, three people move in together and service is set up in one of the individual's name. That person moves out and the individuals who remain at the residence find out that the bill has not been paid or continue to live at the residence with the service still turned on in the name of the person who moved out. The remaining tenants can be held accountable for the unpaid bill even though the account holder moved out. **They are responsible for the electricity or gas costs for the time that they lived there or for the time they benefitted from the energy use.**

Another tenant's bill: An individual or family who moves into a new residence cannot be billed for

the previous tenants' bill, if they did not live with the previous tenant at that address. However, utility companies have been known to refuse to set up service for a person if they suspect that the person wanting to set up new service lived at the residence or will set up service for a customer and bill them for the previous tenants' past due balance. **Customers who did not live at the address at any time and did not benefit from the electric or gas services are not responsible for the bill!**

The new tenant can prove that they did not live there by showing proof of previous residence such as a utility bill with their name and previous address, drivers license, voter registration documents, Veterans benefits card, IRS documents, SSI or disability checks, etc. Unfortunately, showing a lease is not enough and additional documents will be needed to prove a person's previous residence.

The landlord's bill: It is not unusual to hear from customers who say that they are being threatened with a utility shutoff because a landlord or bank that owns the property is not paying the utility bills. When lenders foreclose on properties in California, utilities demand payment from those within their reach. Landlords who cannot collect from previous tenants have also been known to request the new tenant pay the previous tenant's bill as a condition for moving into the residence.

**Customers who did not live at the address at any time and did not benefit from the electric or gas services billed are not responsible for the bill.**

## Back Billing

Back billing is the practice of retroactively billing for undercharged amounts due to meter and billing errors by a utility company. Billing error can include incorrect meter reads, clerical errors, incorrect billing calculations and wrong daily billing factor, sending an estimated bill when the reason for estimation is within the utility's control, and failure to send a bill at all, among other errors. If a residential customer is undercharged due to a billing or meter error, the utility company may bill the customer for the amount of the undercharge for a period of only up to three months.

For example: A customer may be undercharged for weeks, months, or even years without their knowledge. Back billing is usually discovered when the customer receives a retroactive bill for a much larger than usual amount of money and is told to pay within a certain amount of time or their service will be shut off.

Unfortunately, utilities may not always tell the consumer that they are being back billed. The customer might just see an unexplained increase on their statement and not understand why. Fortunately, in most instances a back billing complaint can be settled in favor of the customer. How much a customer will have to pay depends on whether the mistake is a "billing error," "meter error" or "unauthorized use." The distinction is an important one.

- If a customer is overbilled because of billing error, the customer will be due a refund for up to three years of overcharges.
- Meter error relates to non-registering or incorrectly registering meters, which can result in a slow meter and, thus, undercharges to the residential customer. A "fast" meter is also a meter error, and in those cases the customer will be due a refund for up to three years of overcharges.
- Unauthorized use could be due to an unauthorized connection, for example, an

unauthorized reconnection of a meter after it has been turned off by the utility. Using an unauthorized electric meter, letting friends or neighbors use your electrical outlets, or damaging or altering the meter so that it does not read correctly can also be classified as unauthorized connections. If a customer is underbilled because of unauthorized use, the utility may bill the customer for the full period of unauthorized use. The utility may also seek to recover charges for unauthorized use from any person who benefitted from that use, whether or not they were the customers of record at the premise during the time period at issue.

## Vulnerable Customers

Medically vulnerable customers have special medical needs that may require increased energy usage. This can lead to very high bills. High energy usage may make bills unaffordable. The problem is worse for CARE customers, who are also at risk of being taken off the CARE program because of their high usage. The Medical Baseline Program provides special protections for these customers. See section on Medical Baseline for additional information.

Vulnerable customers who do not qualify for medical baseline can still receive some additional protections by registering as vulnerable customers with their utility company.

SDG&E and SoCalGas will also extend an in-person visit to customers known to be elderly (62 or older) or who have a disability. The customer can make a payment during this visit. Available payment options vary by utility company.

SoCalGas will additionally send a utility representative to the customer's home if they notify the utility (before the disconnection notice expires) that they are unable to deliver payment in time to avoid the disconnection because of age or disability. The representative can collect payment from the customer at their home. The utility may also want to verify the medical need.

Utility practices vary regarding the available payment options. If the customer is still unable to pay the bill and all else fails the utility can disconnect a person who is on Medical Baseline or who is registered as a vulnerable customer, so it is important to obtain as much information as possible from the customer.

## PART III. What Can You Do To Help?

Usually when a person seeks out help from an advocate, they have already exhausted all of their options and are running out of time. If you are trying to stop a shutoff, you may have to jump in immediately to help the individual navigate the complaint process and learn about the resources available to them.

This section brings everything together to help you determine if the individual has a viable consumer complaint or does not understand what has occurred to lead up to their current situation.

### How Do I Respond To Shutoff Complaints?

The California Public Utilities Commission (CPUC) has consumer protections in place to help prevent shutoffs. However, a utility company like PG&E, SCE, SoCalGas and SDG&E can shut off service or send a shutoff notice if a customer:

- Does not pay their bill
- Does not follow through on payment arrangements
- Makes a payment with a check that has insufficient funds
- Does not pay a deposit required by the utility

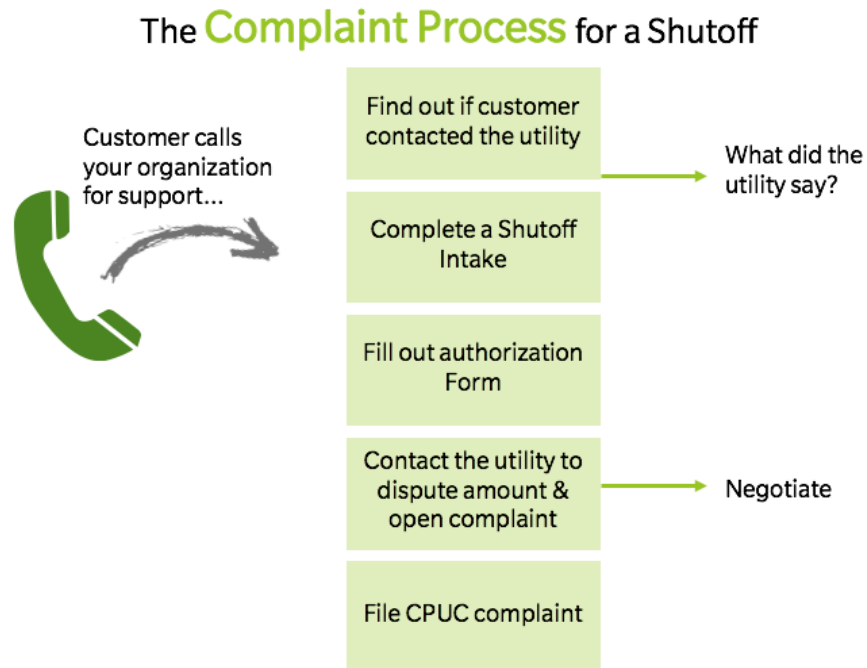
If the customer has not paid the bill and has received a shutoff notice, review the last few bills with the customer and ask the customer:

- Have you paid late, missed payments, or not paid your bill in full?
- Do you think you have been overcharged?
- Does your bill include usage from an earlier period of time, before the most recent billing period?
- Is your utility asking you to pay someone else's bill?
- Do you have a Smart Meter? If not, has your bill been estimated? Was the meter read?
- Is the balance due to an unpaid opt-out Smart Meter charge?



## The Complaint Process

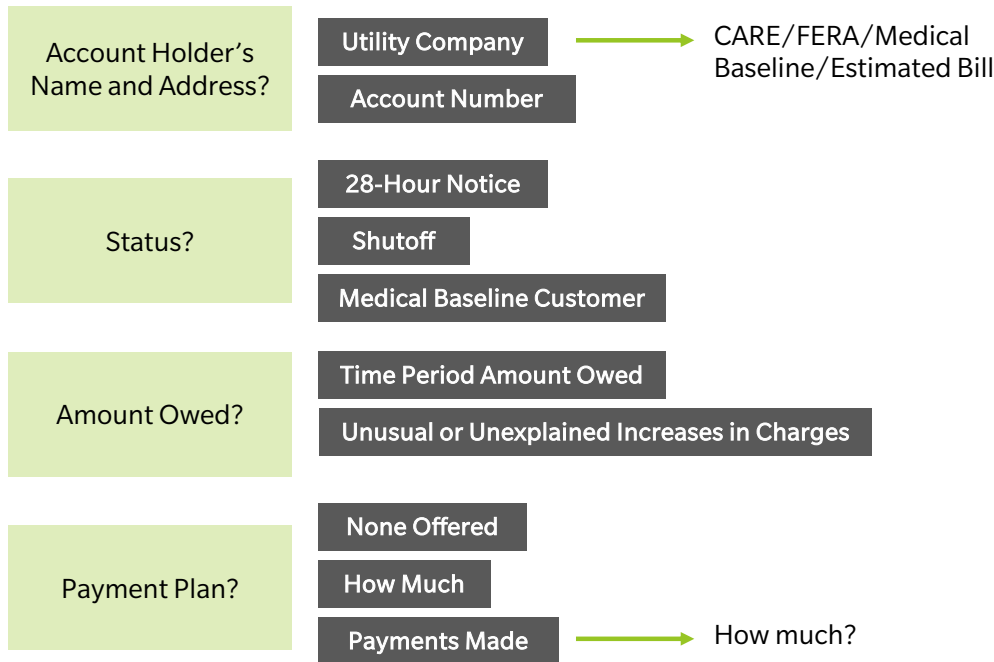
The complaint process itself may not start until you have interviewed the person with the complaint. You may also need to document the complaint by asking the person to show you some of their bills or any documents that they have received from their utility company in order to figure out the complaint. Once you have gotten as much information as you can, you can begin the complaint process.



You will first have to:

- Identify the issue in the complaint. A complaint is when a person comes to you with a specific and identifiable problem.
- You can use the Shutoff Intake Form included in the Appendix to make sure you gather all of the relevant information. Getting copies of the most recent bill will be helpful, but if the situation is a particularly difficult one, you may need to see more bills dating back to when the problem occurred. You can also help the customer set up an online account in order to access the bills so that you can gather the information you will need to resolve the situation.

## Important Questions to Ask



When is it a complaint?

You interview the person, review the bills and find out that the person:

- Tried to negotiate with their utility company and did not get an affordable payment plan.
- Tried to negotiate with their utility company and was not offered a payment plan at all.
- Was dropped from the CARE program.
- Should be enrolled in CARE or FERA and/or Medical Baseline.
- Found out that their bill was not correct.

When is it not a complaint?

Sometimes a person thinks they have a complaint but the problem is due to a lack of information or understanding. For example: *"My bill is too high!"* After talking to the person and reviewing the bill you may find:

- There was a recent rate increase, which means that the bills have gotten higher because we are being charged more for the electric or gas services.
- The rate structure changed, for example: from a tiered structure to time-of-use (TOU).
- They lost their CARE discount because they did not renew their eligibility.
- They lost their CARE discount because they were using too much energy and did not send in required information and have been identified by the utility company as a "high user."
- They lost their Medical Baseline because they did not re-certify.
- The person thought they had a payment plan because they were paying whatever they could each month.
- They did not understand how to read the bill.

## How To Dispute A Bill?

Once you've established that there is a viable complaint, you can dispute the bill.

### How to Dispute a Bill:

#### Call the Utility

- Speak to the Supervisor or Manager
- Tell them you are disputing the past due amount
- Tell them you want to open a complaint

#### Continue to Pay

- Advise the client to pay the current balance due each month until the dispute is resolved

#### File a Complaint with the CPUC

- If you cannot resolve the complaint with the utility, file a complaint with the CPUC
- If the client is shut off, call the CPUC:  
1-800-649-7570

Before you call the company you may need to fill out and fax an **authorization form** to the utility company. The form notifies the company that you have permission to speak on the customer's behalf. Copies of the authorization forms can be found on TURN's website.

- Call the utility company and try to make an affordable payment arrangement.
- The customer may be asked to pay one half of the past due bill. If it is a large bill, try to negotiate a payment that is affordable. If the customer has a good payment history with the utility, use that as leverage.
- Make sure that the customer understands that they need to pay their regular monthly utility bill in addition to the payment arrangement amount.
- Ask the utility to waive the deposit or allow the customer to pay it over several months (CARE and FERA customers have specific rights regarding deposits).

## **Rights and Protections Against Shutoffs**

**Utilities Are Required to:**

**Notify customers before power is shut off**

**Give customers an explanation for the shut off and their options to prevent the shut off**

**Cannot shut off power for nonpayment on Saturdays, Sundays, or legal holidays**

**Cannot disconnect Medical Baseline or life support customers without an in-person visit from a utility representative**

**Provide CARE customers with a 3 – 6 month payment plan for deposits following a shut off**

The utility company may not shut off a customer's service:

- Without notifying the customer prior to disconnecting service for non-payment. PG&E, Edison, SoCalGas and SDG&E must send a 15-day notice of termination (which may be combined with the customer's regular bill) followed by a 48-hour notice, and the utility must attempt to contact the customer by phone or in person at least 24 hours before disconnection.

## What Should A Customer NOT Pay?

Some utility customers may not be responsible for a large bill they received from their utility company. Check to see if any of these situations apply to the person you are helping:

### When Shouldn't a Customer Pay?

They have been back-billed more than 3 months.

They have been coerced into paying someone else's bill.

A deposit for late payment if they are on CARE or FERA

If any of these circumstances are present, have the customer contact the utility right away to dispute the bill or negotiate a more affordable payment plan.

### Don't Wait For A Shutoff Notice Before Contacting The CPUC To Dispute A Bill

Protect the customer by notifying the utility and the CPUC as soon as possible. If the customer wants to dispute the bill, they should file a complaint with the CPUC's Consumer Affairs branch and with the utility company.

They may also need to deposit the amount in dispute with the CPUC in order to keep service on. In addition, any bills received after the complaint is filed (minus the disputed amount) must be paid on time.

### Avoiding a Shutoff During a Billing Dispute

Failure to follow the proper procedures while disputing a bill can result in a shutoff. If a utility customer says that their bill is incorrect, tell the customer to review the bill with a customer services representative. Request to speak with a manager or supervisor. If that fails, have the customer file a complaint with the CPUC immediately. However, it is best to call the CPUC's 800 number instead of filing a written complaint. If the customer files a complaint within 5 days of receiving the disputed bill, the power cannot be shut off until the CPUC has issued a decision and the case has been closed. Even if more than 5 days have passed, however, appealing to the utility and/or the CPUC in an attempt to work something out may buy the customer some time and is always worth a try.

Advise the customer not to wait for a shutoff notice to contact the CPUC if they want to dispute their bill. The customer should protect themselves by notifying the utility as soon as possible of their intent to dispute their bill and the reasons for doing so. You should also make sure that any bills the customer receives after the disputed ones are paid in full (minus the disputed amount) and on time.

## How to Submit a Complaint to the CPUC directly:

File online: [www.cpuc.ca.gov/static/forms/complaints/index.htm](http://www.cpuc.ca.gov/static/forms/complaints/index.htm)

Call CPUC hotline: 1-800-649-7570

Write CPUC: CPUC, Consumer Affairs Branch,  
505 Van Ness Ave. San Francisco, CA 94102-3298

## Include this information in your complaint:

Customer name

Utility account number

Service address

Brief description of the complaint

Mailing address

Copies of any disputed bills

Name of utility company

Copies of any other documents

### Important Rules Or Policies You Need To Know

Understanding the rules of tariffs can be very useful in helping a customer with a shutoff. Rules or tariffs for PG&E, SCE, SoCal Gas, and SDG&E can be found on the company web sites. The list below are the most common rules you will need to know when assisting a person with a shutoff.

- Application for Service
- Establishment and Reestablishment of Credit
- Deposits
- Rendering and Payment of Bills
- Disputed Bills
- Restoration of Service
- Adjustment of Bills for Billing Error

Go to the following websites and click on Electric or Gas tariffs at:

- Pacific Gas and Electric: <http://www.pge.com/tariffs/>
- Southern California Edison: <https://www.sce.com/>
- Southern California Gas: <https://www.socalgas.com/regulatory/tariffs/tariffs-rules.shtml>
- San Diego Gas and Electric:
  - Gas Rules: [http://regarchive.sdge.com/tm2/ssi/inc\\_gas\\_rules.html](http://regarchive.sdge.com/tm2/ssi/inc_gas_rules.html)
  - Electric Rules: [http://regarchive.sdge.com/tm2/ssi/inc\\_elec\\_rules.html](http://regarchive.sdge.com/tm2/ssi/inc_elec_rules.html)

## Third-Party Notification

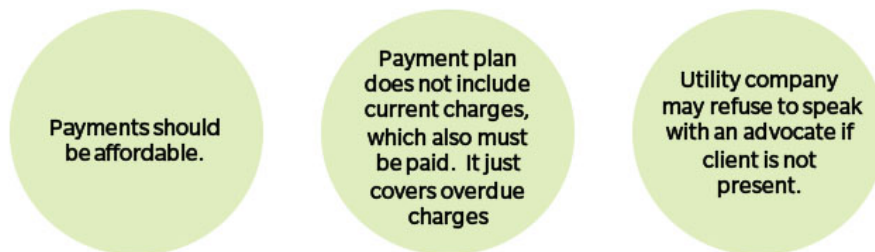
Third-Party Notification can allow friends and family members support one another in the case of missed utility bill payments because of illness, hardship or other issues. With Third-Party Notification, a designated third party will be notified when the related person receives a late notice for an unpaid bill. This service can be especially important for elderly customers or customers with impaired capacity who might not respond to notices, even if they have the funds to pay the bill.

The designated third party is not responsible for paying the bill, but this allows friends and relatives to help and support one another. Contact the utility company for more information on how to sign up for this service.

## Payment Plans

### When Asking for a Payment Plan

Keep in Mind:



Try to set up a payment plan: PG&E, SDG&E, SoCalGas and SoCal Edison can offer customers in danger of a shutoff a payment plan that will allow them to continue receiving service while paying off their outstanding balance.

TIP: If there is a change in circumstances (job loss, illness, etc.), tell the customer to call their utility immediately to see if they can revise their payment plan or ask for an extension on their payment that month. If the utility will not work with them, advise them to file a CPUC complaint.

If the customer does not make the payments negotiated, the entire amount owed will immediately become due and service may be terminated after 48-hour notice, either by phone or in writing. Do not be afraid to ask for a 12- or 18-month plan! Some utility companies might be willing to extend the arrangement beyond 12 months.

Be sure to tell the customer to alert the utility if someone in their household would face serious health or safety risks if the service were disconnected. The utility may offer more flexible payment arrangements.

Customers of the gas and electric utilities who are enrolled in the Medical Baseline program and meet additional requirements of hardship are entitled to a payment plan of 12 months. The utility cannot disconnect them for falling behind on bills if they agree to a payment plan. This protection is discussed below under the description of the Medical Baseline program.

Make sure the customer is receiving any rate discounts or other assistance they are eligible for, such as CARE or FERA rates, Medical Baseline rates and other programs.

The utility company CAN propose a payment schedule that takes into account a customer's individual financial situation and payment history.

If the customer has any difficulty reaching an agreement with the utility, contact the CPUC at 1.800.649.7570. Once a complaint has been filed with the utility company and the CPUC, the CPUC will notify the utility, and the utility will have 10 days to respond. If the customer has already received a shutoff notice call the CPUC in order to get a quicker response from the utility.

Filing a complaint with the CPUC does not relieve the customer of the responsibility to pay for current charges on subsequent bills. If a written complaint is filed, it could take 4 to 6 weeks to get a response.

## Utility Protections for Renters

Public Utilities code 777 gives residential renters the ability to become customers of a utility corporation if a landlord does not pay the utility bill and/or the property has been foreclosed. It specifies that if one or more of the residential occupants are willing and able to assume responsibility for the subsequent charges to the account to the satisfaction of the utility corporation, the electrical, gas, heat, or water corporation is required to make service available to the residential occupants. The renter can apply for new service and should not be required to pay the landlord's outstanding balance.

Law also requires any notices under this statute to be provided in English, Spanish, Chinese, Tagalog, Vietnamese and Korean.

### **California Public Utilities Code Section 777**

*(a) This section applies if there is a landlord-tenant relationship between the residential occupants and the owner, manager, or operator of the dwelling.*

*(b) If an electrical, gas, heat, or water corporation furnishes individually metered residential service to residential occupants of a detached single-family dwelling, a multiunit residential structure, mobile home park, or permanent residential structure in a labor camp, as defined in Section 17008 of the Health and Safety Code, and the owner, manager, or operator of the dwelling, structure, or park is the customer of record, the corporation shall make every good faith effort to inform the residential occupants, by means of written notice, when the account is in arrears, that service will be terminated at least 10 days prior to termination. The written notice shall further inform the residential occupants that they have the right to become customers, to whom the service will then be billed, without being required to pay any amount, which may be due on the delinquent account. The notice shall be in English and in the languages listed in Section 1632 of the Civil Code.*

*(c) The corporation is not required to make service available to the residential occupants unless each residential occupant agrees to the terms and conditions of service and meets the requirements of law*



and the corporation's rules and tariffs. However, if one or more of the residential occupants are willing and able to assume responsibility for the subsequent charges to the account to the satisfaction of the corporation, or if there is a physical means, legally available to the corporation, of selectively terminating service to those residential occupants who have not met the requirements of the corporation's rules and tariffs, the corporation shall make service available to those residential occupants who have met those requirements.

(d) If prior service for a period of time is a condition for establishing credit with the corporation, residence and proof of prompt payment of rent or other credit obligation acceptable to the corporation for that period of time is a satisfactory equivalent.

(e) Any residential occupant who becomes a customer of the corporation pursuant to this section whose periodic payments, such as rental payments, include charges for residential electrical, gas, heat, or water service, where those charges are not separately stated, may deduct from the periodic payment each payment period all reasonable charges paid to the corporation for those services during the preceding payment period.

(f) In the case of a detached single-family dwelling, the corporation may do any of the following: (1) Give notice of termination at least seven days prior to the proposed termination, notwithstanding the notice period specified in subdivision (a). (2) In order for the amount due on the delinquent account to be waived, require an occupant who becomes a customer to verify that the delinquent account customer of record is or was the landlord, manager, or agent of the dwelling. Verification may include, but is not limited to, a lease or rental agreement, rent receipts, a government document indicating that the occupant is renting the property, or information disclosed pursuant to Section 1962 of the Civil Code.

(g) This section shall become operative on July 1, 2010.

## Lowering Your Bills: Important Resources

The CPUC is responsible for administering Public Purpose Programs for consumers who meet certain income limits. Eligible customers may receive discounts on their local phone service, natural gas and electric service, and some water service. Because income limits may change every year, it's possible that if a consumer did not qualify the previous year, they may qualify the next year. Below is a description of the programs available to low-income customers, plus Medical Baseline, which is available to any qualifying customer regardless of income.

**NOTE: Immigration status is irrelevant for CARE, FERA and Medical Baseline. Clients do not need a Social Security Number in order to register for programs administered by the utility companies.**

**Programs administered by the federal government such as LIHEAP may include immigration status requirements.**

## California Alternate Rates for Energy (CARE)

CARE provides a 20% discount on customers' natural gas bill and a 30-35% discount on their electric bill. Eligible customers are those whose total household income is at or below the income limits indicated below:

<b>CARE Income Guidelines*</b>	
<b>Household Size</b>	<b>Income Eligibility Upper Limit</b>
1-2	\$32,920
3	\$41,560
4	\$50,200
5	\$58,840
6	\$67,480
7	\$76,120
8	\$84,760
9	\$93,400
10	\$102,040
Each Additional Person	\$8,640
* Before taxes and effective through May 31, 2019	

Customers may also be eligible for CARE if they are enrolled in public assistance programs such as Medicaid/Medi-Cal, Women, Infants and Children Program (WIC), Healthy Families A & B, National School Lunch's Free Lunch Program (NSL), Food Stamps/SNAP, Low Income Home Energy Assistance Program (LIHEAP), Head Start Income Eligible (Tribal Only), Supplemental Security Income (SSI), Bureau of Indian Affairs General Assistance, and Temporary Assistance for Needy Families (TANF) or Tribal TANF.

## The Family Electric Rate Assistance Program (FERA)

Customers participating in the FERA program receive a 12% discount on their electric charges. Families whose household income slightly exceeds eligibility for CARE allowances may qualify to receive FERA discounts. The following are the income limits (before taxes) in effect until May 31, 2019:

<b>Household</b>	<b>250% of Federal Poverty Guidelines (FERA)</b>
1-2	Not eligible
3	\$41,561 to \$51,950
4	\$50,201 to \$62,750
5	\$58,841 to \$73,550
6	\$67,481 to \$95,150
7	\$76,121 to \$95,150
8	\$84,761 to \$105,950
9	\$93,401 to \$116,750
10	\$102,041 to \$127,550
Each Additional Person, add	\$8,640 to \$10,800

## Medical Baseline and Other Assistance for Medically Vulnerable Customers

When a person is on Medical Baseline, on life support, or has self-certified to their utility that they have a serious illness or condition that could become life threatening, their utility company is required to:

- Make an in-person visit a few days before a shutoff is scheduled or at the time of disconnection for non-payment
- Warn the customer if there is a planned outage scheduled in their residential area
- Provide additional natural gas and/or electricity at the lowest rate

**Medical Baseline** provides extra allowances of natural gas and electricity billed at the lowest rate for customers who rely on life support equipment, or those who have life threatening illnesses or compromised immune systems. "Life support equipment" means equipment that uses mechanical or artificial means to sustain, restore, or supplant a vital function, or mechanical equipment that is relied upon for mobility both within and outside of buildings. This includes: all types of respirators, iron lungs, hemodialysis machines, suction machines, electric nerve stimulators, pressure pads and pumps, aerosol tents, electrostatic and ultrasonic nebulizers, compressors, IPBB machines and motorized wheelchairs. Medical Baseline allowance is available to: paraplegics and quadriplegics, multiple sclerosis patients, scleroderma patients, and people being treated for a life-threatening illness or who have a compromised immune system. If a person needs additional cooling or heating in order to avoid deteriorating health, they qualify for Medical Baseline.

**Medical Baseline is not a means tested program and is available to everyone with a qualifying medical condition regardless of income.**

The Medical Baseline program helps people who have serious medical conditions and/or medical equipment that increase the costs of their utilities. Customers who qualify for Medical Baseline can get more of their gas and electricity at the lower rates. This helps reduce energy costs for qualified customers, regardless of their household income.

### Monthly Bill Discounts

All customers get a standard "Baseline Allowance" each month. The Baseline Allowance is a set amount of electricity and natural gas for basic needs that is charged at the lowest rate. Medical Baseline customers get an additional Medical Baseline Allowance of approximately 500 kilowatt-hours of electricity and/or 25 therms of gas at the lowest rate each month. This can help reduce energy costs.

If the standard Medical Baseline Allowance does not meet the household's medical needs, customers may ask for an additional Medical Baseline Allowance.

If more than one household member has a qualifying medical condition, the customer may qualify for more than one Medical Baseline allowance.

## **Additional Protections From Disconnection for Nonpayment**

Customers enrolled in the Medical Baseline program who meet additional qualifications of hardship are entitled to special protections from disconnection. These protections are found in Section 779.3 of the California Public Utilities Code and apply where the customer can't afford to pay the bill on time and is willing to enter into a 12 month payment plan for the amount past due. In order to qualify, the customer must also meet one of the following criteria:

- (1) The customer or a member of the customer's household is under hospice care at home.
- (2) The customer or a member of the customer's household depends upon life-support equipment.
- (3) The customer or a member of the customer's household has a life-threatening condition or illness, and a licensed physician, person licensed pursuant to the Osteopathic Initiative Act, or nurse practitioner certifies that gas or electric service is medically necessary to sustain the life of the person or prevent deterioration of the person's medical condition.

## **Who Qualifies for Medical Baseline?**

Any full-time resident of the home with a qualified medical condition or requiring qualified medical equipment is eligible for this program. Medical Baseline is based on a medical condition and use of medical devices only, not on income. The application must be filled out and signed by the utility account holder. A doctor's certification is required as part of the eligibility process and may be provided by a licensed physician, a person licensed pursuant to the Osteopathic Initiative Act, or a physician assistant. If a family member has a permanent disability certified by their doctor, they will need to self-certify their eligibility every two years. If the disability is not permanent, the family member will have to self-certify each year and will need a doctor's certification every two years.

## **Qualifying Medical Devices**

A person who needs the following medical devices is eligible for Medical Baseline. Whirlpool pumps, heating pads, vaporizers, humidifiers, pool or tank heaters, saunas or hot tubs do not qualify for the program. However, other equipment that uses electricity may qualify such as:

- Aerosol tents
- Apnea monitors
- Hemodialysis machines
- Kidney dialysis machines
- Suction machines
- IPPB machines
- Electrostatic nebulizers
- Ultrasonic nebulizers
- Pressure pumps
- Pressure pads
- Compressors
- Electric nerve stimulators
- Motorized wheelchairs
- Iron lungs
- Respirators
- Oxygen concentrators

## **Qualifying Medical Conditions**

Customers may also qualify for Medical Baseline if they need permanent space heating or air conditioning due to conditions such as:

- Paraplegia: paralysis of the lower half of the body including both legs
- Quadriplegia: paralysis of both arms and both legs
- Hemiplegia: total or partial paralysis of one side of the body
- Multiple sclerosis: a disease of the nervous system that causes gradual loss of muscle control
- Scleroderma: an autoimmune, rheumatic, and chronic disease that affects the body by hardening connective tissue
- A compromised immune system
- A life-threatening illness

**Medical Baseline Allowances are also available for any other condition for which additional heating or cooling is medically necessary to sustain the person's life, or prevent deterioration of the person's medical condition.**

## **Vulnerable Customers That Do Not Qualify For Medical Baseline**

For households with one or more individuals who have self-certified that they have a serious illness or condition that could become life threatening if their electric or gas service is disconnected for non-payment will also receive an in-person visit from a utility representative before disconnection. A representative will post a notice within 48 hours before or at the time of disconnection for non-payment. Customers who wish to self-certify must call their utility for an application.

## Energy Savings Assistance Program (ESAP)

The Energy Savings Assistance Program (ESAP) provides no-cost weatherization services to low-income households who meet the [CARE](#) income guidelines. Services provided include attic insulation, energy efficient refrigerators, energy efficient furnaces, weather stripping, caulking, low-flow showerheads, water heater blankets, door and building envelope repairs that reduce air infiltration, among others. This also varies by utility, geographic area and climate zones.

<b>ESAP Income Guidelines*</b>	
<b>Household Size</b>	<b>Income Eligibility Upper Limit</b>
1-2	\$32,920
3	\$41,560
4	\$50,200
5	\$58,840
6	\$67,480
7	\$76,120
8	\$84,760
9	\$93,400
10	\$102,040
Each Additional Person	\$8,640
* Before taxes and effective through May 31, 2019	

## Resources for PG&E, SDG&E, SCE and SoCalGas Customers

Each IOU manages an assistance program for their customers. These programs offer financial assistance to their customers in their service territory on a case by case basis.

### **PG&E's REACH Program**

The Relief for Energy Assistance through Community Help (REACH) is a program that helps clients pay for energy during a crisis. REACH provides an energy credit for up to \$300 based on the past due bill amount. PG&E sponsors REACH, and The Dollar Energy Fund runs the program from 170 offices in northern and central California.

PLEASE NOTE: REACH is available only once within an 18-month period except, in some cases, for the elderly, physically challenged and terminally ill.

In order for your client to qualify for help from REACH:

- Customer must have a residential account with PG&E in the name of an adult living in the household
- Customer must demonstrate an uncontrollable or unplanned change in their ability to pay their PG&E bill
- Customer must not live in subsidized housing (Exceptions: Seniors, permanently disabled or terminally ill)
- Customer must not have received REACH assistance within the past 18 months
- Customer must have received either a 15-day or a 48-hour disconnection notice
- Customer income must not exceed the REACH income guidelines, which are currently 200 percent above the federal poverty guidelines, the same as those for CARE. For more information, contact the REACH program at 1-800-933-9677

### **SDG&E's Neighbor-to-Neighbor Fund**

The Neighbor-to-Neighbor Fund provides customers experiencing temporary financial hardship and who are not eligible for state or federal assistance up to \$200 towards their SDG&E bill. To apply, contact 211 San Diego for a direct reference to participating agencies. 211 San Diego is a resource and information hub that connects people with services through a free, 24-hour, 7 days a week phone service and searchable online database.

### **Southern California Edison's Energy Assistance Fund**

The Energy Assistance Fund (EAF) is committed to providing critical support to those when they need it most. In partnership with the United Way of Greater Los Angeles, Southern California Edison provides one-time bill payments of up to \$100. Call 1-800-205-8596 for more information.



## **Southern California Gas's Gas Assistance Fund**

If your client is having difficulty paying their gas bill during the winter, the Gas Assistance Fund (GAF) may be able to provide them with a one-time grant for the amount of the gas bill, not to exceed \$100.00.

The Gas Assistance Fund is a joint effort of SoCalGas and United Way of Greater Los Angeles. They work with non-profit partner organizations throughout our service territory to administer the program. Call 1-877-238-0092 for more information.

To qualify for GAF, your client must meet the following requirements:

- The gas bill must be in the name of the applicant requesting assistance.
- The bill address must be the applicant's primary residence.
- The applicant must not apply for more than the maximum GAF allowance for the current program year.
- The applicant must meet the income guidelines that are the same as those for CARE.

## **Federal Dollars Can Help Pay Your Bill!**

### **Low-Income Home Energy Assistance Program (LIHEAP or HEAP)**

The Low-Income Home Energy Assistance Program (LIHEAP or HEAP) is federally funded program that provides financial assistance to eligible households to offset the costs of heating and/or cooling dwellings. Because the federal government administers it, recipients may be required to provide a Social Security Number. LIHEAP helps keep families safe and healthy through initiatives that assist families with energy costs. They provide federally funded assistance in managing costs associated with:

- Home energy bills
- Energy crises
- Weatherization and energy-related minor home repairs

For more information, call 1-866-675-6623. Administered by the California Department of Community Services and Development (CSD) Find contact information for your local Low-Income Energy Office at: <http://www.acf.hhs.gov/programs/ocs/resource/help-with-paying-for-heating-or-cooling>. To find an office in your community go to the LIHEAP website: [www.csd.ca.gov/Services/FindServicesinYourArea.aspx](http://www.csd.ca.gov/Services/FindServicesinYourArea.aspx). For Income guidelines go here: <http://www.csd.ca.gov/Services/HelpPayingUtilityBills/EnergyIncomeGuidelines.aspx>

The Weatherization Assistance Program provides free weatherization services to improve the energy efficiency of homes, including attic insulation, weather stripping, minor housing repairs, and related energy conservation measure. For more information call: 1-866-675-6623

## Tips To Lower Your Bills

- Your water heater is the third highest energy expense in your home. Try turning it down to 120°F.
- A 5° higher setting on your air conditioning thermostat will save about 10% on cooling costs. Set your thermostat between 75 F and 78F when you are home and 85 F when you are away for more than a few hours.
- Register for your utility company's AC cycling program.
- Turn off everything not in use: lights, TVs, computers. Plug electronics into a power strip or individual adapters that can be switched off so the appliance draws no "vampire" electricity while it is in standby mode. You'll be very surprised at the difference it makes.

### Kitchen

- Fill your refrigerator with large water bottles and jugs to keep it full.
- When cooking, keep the lids on pots.
- Vacuum the coils on your refrigerator at least every three months. The dirt build-up makes the refrigerator work harder to keep the contents cool and therefore uses more energy.

### Laundry

- Wash clothes in cold water instead of hot. 90% of the energy a washing machine consumes goes to heating the water.
- Make sure your dryer's outside vent is clear and clean the lint filter after every load.
- Put a dry towel in the dryer with each load of wet clothes. The towel will absorb dampness and reduce drying time.
- Use a clothesline.

# Appendices

## Sample Scripts

When communicating with a utility company it is important to highlight the most relevant information that will help resolve the complaint. You may also need to fill out an authorization form which let's the utility company know that you have the customer's permission to advocate on their behalf. Below is a sample script you can use for communicating with the utilities by phone or email.

### **Sample Script: Shutoff and request for a new payment plan**

Name of customer who is the Account Holder  
Account Number  
Address  
Phone Number

We have a PG&E customer who lives in Butte County, Mr. Bill Smith. Mr. Smith had a heart attack in January and has been unable to work since then. He is getting ready to go back to work and has been unable to make payments on his PG&E bill. In late April, early May, he tried to make payment arrangements but was forced to set up a payment plan that he could not afford. When he could not make his first payment, he was shut off.

He now owes \$1,100. He has gone to REACH, Catholic Charities and LIHEAP and was told there were no funds. He also has six year-old who has recently undergone open-heart surgery and needs access to electricity for his oxygen tank. The family was on CARE and applied for Medical Baseline over a month ago. (They have still not heard back.)

Is there any way possible that his electricity can be restored and the family be put on a 12-month payment plan? The monthly bill ranges from \$150 to \$170. Mr. Smith can afford to pay \$75 plus his monthly bill.

### **Sample Script: Shutoff due to a back billing error**

Name of customer who is the Account Holder

Account Number

Address

Phone Number

I have been working with a consumer who is being back billed in the amount of \$1,933.50. She has been trying to work with PG&E to resolve this issue for the past month and so far has not been able to reach a resolution. In fact, she has received a shut off notice for today.

The Smith family had a Smart Meter installed sometime in March. The monthly bills started to fluctuate from low to high. They had monthly bills of about \$12, then \$32, and a high in June of \$161.64. All were paid on time. When they received the first big bill they spoke to a PG&E Customer Service representative and were told that the problem was not an error in billing but that PG&E was "just getting around to billing them for electricity." Ms. Smith is disputing this bill because she is clearly being back billed due to a PG&E billing error (undercharge). After reviewing the bill and speaking to Ms. Smith, it does indeed look like she was undercharged due to a billing error after the new meter was installed.

It would appear that PG&E is in non-compliance with Electric Rule No 17.1: Adjustment of Bills for Billing Error, Billing Errors Resulting in Undercharges to the Customer, Residential Service. This rule states "If a residential service is found to have been undercharged due to a billing error, PG&E may bill the Customer for the amount of the undercharge for a period of three months." Ms. Smith has no problem paying the electricity charges for the last three months.

Can someone please call Ms. Smith and stop the shutoff scheduled for today?

## Infographic Sources

<sup>1</sup> 2011-2015 American Community Survey 5-Year Estimates, table B25106 Low-income households included are those earning between \$0 - \$49,999 a year.

<sup>2</sup> 2014 California Health Interview Survey. Low-income is defined as below 200 percent of the federal poverty line.

<sup>3</sup> Economics, Evergreen. "Needs Assessment for the Energy Savings Assistance and the California Alternate Rates for Energy Programs." prepared for the California Public Utilities Commission, December 16 (2013). The percentage of low-income customers who are energy insecure was determined from this report; Low-income is defined as below 200 percent of the federal poverty line. The total number of customers was calculated by applying this percentage to the total number of CARE customers across the four investor-owned utilities in 2016. Because CARE does not have a 100 percent penetration rate with eligible customers, this total number of energy insecure customers is likely a conservative estimate.

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