

## Customer Service Policy A.6a 2020 Covid-19 Emergency Consumer Protection Policy

### Purpose:

On March 16, 2020 Governor Newsom issued an Executive Order requesting the California Public Utilities Commission (CPUC) to monitor the consumer protections offered by the utilities in response to COVID-19. The CPUC issued a letter to the investor-owned utilities, including PG&E, on March 17, 2020 explaining that although COVID-19 has not resulted in the same disruptions or degradations to utility service as the recent wildfires, the utilities should immediately extend applicable protections provided for customers in natural disasters, such as wildfires, to the COVID-19 pandemic. See CPUC Decision 19-07-015.

Based on Governor Newsom's Executive Order on March 16th, SCPA implemented its internal "COVID-19 Emergency Consumer Protection Policy I.13" for its Residential and Non-Residential Customers experiencing financial hardship due to the COVID-19 pandemic. This Policy is consistent with and continues the policies set forth in Policy I.13.

On February 11, 2021, the CPUC voted to extend consumer protections for all utilities it regulates until June 30, 2021.

On March 4, 2021, SCPA's Board of Directors extended the protections under Customer Service Policy A.6a - 2020 COVID-19 Emergency Consumer Protection Policy until June 30, 2021 to match PG&E's Emergency Consumer Protection Plan.

### Definitions:

For purposes of this Policy, the following definitions apply:

- a) **Residential Customer**<sup>1</sup>: Class of customers whose dwellings are single-family units, multi-family units, mobile homes or other similar living establishments. A customer who meets the definition of a Residential Customer will be served under a residential rate schedule if 50% or more of the annual energy use on the meter is for residential end-uses. PG&E's tariff eligibility requirements will determine customer eligibility for this rate class.
- b) **Non-Residential Customer**<sup>2</sup>: Small and medium business customers that take service on a commercial, industrial, or agricultural rate. This definition does not include Non-Residential Customers who are on a fixed usage or unmetered usage rate schedule<sup>3</sup>.

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<sup>1</sup> PG&E Electric Rule No. 1: Definitions, Sheet 30

<sup>2</sup> PG&E Advice Letter 4014-G/5378-E. Dated Sept. 7, 2018.

<sup>3</sup> PG&E Electric Rule No. 1: Definitions, Sheet 31

**Ratified:** October 1, 2020

**Amended:** December 3, 2020, March 4, 2021, June 3, 2021,  
August 5, 2021

- c) **SCPA Service Area:** As defined by SCPA's Joint Powers Agreement<sup>4</sup>.
- d) **Impacted Customers:** Customers that are in located in the area designated by California Governor's Office or the President of the United States as a state of emergency.

### **Background:**

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

As adopted, D.19-07-015 requires PG&E to implement the emergency disaster relief program "in the event the Governor of California or a President of the United States declares a state of emergency because a disaster has either resulted in the loss or disruption of the delivery or receipt of utility service and/or resulted in the degradation of the quality of utility service."

Although COVID-19 has not resulted in the loss or disruption of the delivery or receipt of gas and electrical service and/or in the degradation of the quality of gas and electrical service, SCPA understands that customers may be affected financially, whether diagnosed with the virus or not.

On March 16, 2020 Governor Newsom issued an Executive Order requesting the Commission to monitor the consumer protections offered by the utilities in response to COVID-19. The Commission issued a letter to the investor-owned utilities on March 17, 2020 explaining that although COVID-19 has not resulted in the same disruptions or degradations to utility service as the recent wildfires, the utilities should immediately extend applicable protections provided for in D.19-07-015 to Impacted Customers.

Based on Governor Newsom's Executive Order on March 16th, SCPA implemented its internal "COVID-19 Emergency Consumer Protection Policy I.13" for its Residential and Non-Residential Customers experiencing financial hardship during the COVID-19 pandemic.

On October 1, 2020, the Board of Directors ratified Customer Service Policy A.6a - 2020 COVID-19 Emergency Consumer Protection Policy. This policy went into effect the day a state of emergency proclamation has been issued by the California Governor Newsom's Office until December 31, 2020.

On December 3, 2020, the Board of Directors extended the protections under Customer Service Policy A.6a - 2020 COVID-19 Emergency Consumer Protection Policy until March 3, 2021 to match PG&E's Emergency Consumer Protection Plan.

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<sup>4</sup> Sonoma Clean Power Authority Joint Powers Authority. <https://sonomacleanpower.org/uploads/documents/Third-Amended-JPA-FinalApproved-10-13-16-with-updated-Ex-C.pdf>

On February 11, 2021, the Commission unanimously voted to extend protections for all utilities it regulates until June 30, 2021.

On March 4, 2021, SCPA's Board of Directors extended the protections under Customer Service Policy A.6a - 2020 COVID-19 Emergency Consumer Protection Policy until June 30, 2021 to match PG&E's Emergency Consumer Protection Plan.

On June 3, 2021, SCPA's Board of Directors extended the protections under Customer Service Policy A.6 - 2020 COVID-19 Emergency Consumer Protection Policy. See summary below:

- 1) **Late Payment Notice:** SCPA will send modified Late Payment Notices to eligible customers starting through January 14, 2022.
  - a) **Modified Late Payment Notices:** SCP will begin sending Modified Late Payment Notices to eligible customers starting July 1, 2021. Modified Late Payment Notices will communicate to customers that their account is delinquent with SCPA and request payment.
- 2) **Transfer for Non-Payment:** SCPA will not transfer eligible customers back to PG&E for non-payment through January 14, 2022.
- 3) **Pre-Collection Notices:** SCPA will resume sending Pre-Collection Notices to eligible customers July 1, 2021. These notices are sent to customers who no longer have an account with SCPA but have an outstanding balance.
- 4) **Collections:** SCPA will resume collection activity for eligible customers July 1, 2021.

On June 24, 2021, the California Public Utilities Commission (CPUC), in ongoing efforts to ensure continued access to essential utility services during the COVID-19 pandemic, today suspended disconnections of residential and small business customers for an additional three months, through September 30, 2021. This provides time for energy utilities to notify customers of a new CPUC solution to resolving COVID-19 era utility bill debt, which provides residential customers two years over which to pay off deferred energy bills, with help anticipated to become available in the California state budget. Similar relief was ordered for small businesses.

#### **Eligibility for COVID-19 Emergency Consumer Protection Plan:**

Due to potential financial hardship from COVID-19, a customer will be eligible for SCPA's 2020 Covid-19 Emergency Consumer Protection Plan if the following criteria has been met:

- a. A state of emergency proclamation has been issued by the California Governor's Office or the President of the United States due to the health emergency in SCPA's Service Territory; and

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3

- b. The customer is a Residential Customer or Non-Residential Customer of SCPA.

**2020 COVID-19 Emergency Consumer Protection Plan:**

SCPA's Emergency Consumer Protection Plan goes into effect the day a state of emergency proclamation has been issued by the California Governor's Office or the President of the United States due to a disaster in SCPA's Service Territory and includes the measures and parameters outlined below:

- a. **Late Payment Notice:** SCPA will begin sending Late Payment Notices to eligible customers starting through April 1, 2022.
  - i. **Modified Late Payment Notice:** SCPA will begin sending Modified Late Payment Notices to eligible customers starting October 1, 2021.
- b. **Transfer for Non-Payment:** SCPA will not transfer eligible customers back to PG&E for non-payment through April 1, 2022.
- c. **Pre-Collection Notices:** SCPA will resume sending Pre-Collection Notices to eligible customers October 1, 2021.
- d) **Collections:** SCPA will resume collection activity for eligible customers on October 1, 2021.

SCPA's Board of Directors may change or extend these measures at its sole discretion.