

2014

CHANGES Pilot Program Annual Report



**Community Help and Awareness of Natural Gas and
Electricity Services (CHANGES)**



California Public Utilities
Commission

Consumer Service and
Information Division

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Executive Summary

The California Public Utilities Commission's (CPUC or Commission) Consumer Service and Information Division (CSID) is providing this report, which documents activities provided through the CPUC Community Help and Awareness of Natural Gas and Electricity Services (CHANGES) pilot program. The report covers January 2014 through December 2014.

The CHANGES pilot provides limited English proficient (LEP) people with natural gas and electricity (energy) education and assistance in the language of the LEP person's choice. Services include education and assistance in understanding and managing energy bills. It includes assistance to help LEP people establish payment arrangements or renegotiate payment arrangements, which are more agreeable with their budgets. The pilot helps LEP people avoid disconnection or assists them in reconnection of their service. It helps them sign up for consumer assistance programs and financial assistance, and helps them receive adjustments or corrections to their bills. These services are provided through a statewide network of community based organizations (CBOs).

The CHANGES pilot is modeled after a CPUC program, which was created to assist California's significant LEP population in understanding and resolving issues with telecommunications services and bills. According to the 2010 U.S. Census decennial data, more than six million, or 21 percent of California's adult population, is LEP. The level of LEP people in California is likely to continue, since California remains a primary immigration destination. For the telecommunications program, the CPUC utilizes CBOs to assist LEP consumers. CBOs provided solid support because, through provision of vital services, they had already developed strong, positive relationships with the LEP communities they serve. Therefore, the LEP population has come to trust the CBOs.

While providing these services in selected locations throughout the state, the CHANGES pilot provides opportunity for the CPUC to collect data to demonstrate the level of demand for these services. The CPUC collects demographic data on the populations served, and whether those served fall within the income eligibility requirements for the California Alternate Rates for Energy Program (CARE), which is provided through the CPUC. The data collected is to be used to determine whether the CHANGES pilot should be made a permanent program, and if so, whether the services should be expanded to encompass all areas of California.

The pilot will also consider the funding level and funding source for an ongoing program, if adopted. The pilot is funded through CARE, as provided in the California Public Utilities Code,



Section 739.4 (b) (3) (Attachment A), because most of the consumers to be assisted in this pilot are likely to have income levels that fall within CARE eligibility requirements. In fact, the CHANGES Needs and Dispute Resolution database notes that 94% of all of the clients assisted up through 2014 have been CARE eligible.

During the year 2014, activity increased among the 19 CBOs participating in the pilot.¹ The increase may be attributed to increased awareness of the program. The pilot's flexibility, enabling it to add services to meet current demand, may also have contributed. In 2014, two issues emerged affecting the CHANGES clients: increased selling of Core Transport Agent (CTA) service (where consumers may purchase natural gas from a party other than the IOU) and CARE High Use requirements (CARE clients whose usage exceeds 400 percent of their monthly baseline allowance). In response to these issues, CHANGES began assisting consumers with the addition of education workshops and with Need or Dispute Resolution. The services the CBOs provided in 2014 are summarized below, are detailed later in this report and are included in the attachments.

- ❖ **44 Languages** – Outreach, Education Workshops, and Needs and Dispute Resolutions were transacted in 44 languages, an increase of 16 languages from 2013. Caseworkers are able to directly communicate with the clients seeking their services.
- ❖ **3,334,175 Outreach Contacts** – Through attending community events, and enlisting print and broadcast media in languages other than English, the CBOs promoted the existence of the CHANGES pilot at their respective CBOs.² This is an increase of 1,560,989 contacts compared to 2013.
- ❖ **24,882 Consumers Educated** – CBOs held workshops to educate people on eight different topics. This is an increase of two workshops, and 10,589 more people educated than 2013.
- ❖ **1,473 Cases with 2,821 Needs and Dispute Resolutions** – This is 178 more cases than 2013. There were approximately 1.92 resolutions per case, meaning when a client came to a CBO with one concern, the caseworker took care of other matters as well. For example, a Spanish-speaking client came to a CBO seeking assistance with their bill. The caseworker helped her with the Home Energy Assistance Program (HEAP) application to secure an initial payment on the account, helped her

¹ Attachment C provides the list of the CBOs participating and the general service area they covered.

² This figure is based on each respective media's reported subscribership.



set up a payment plan, and gave her tips on how to conserve energy to lower future bills.

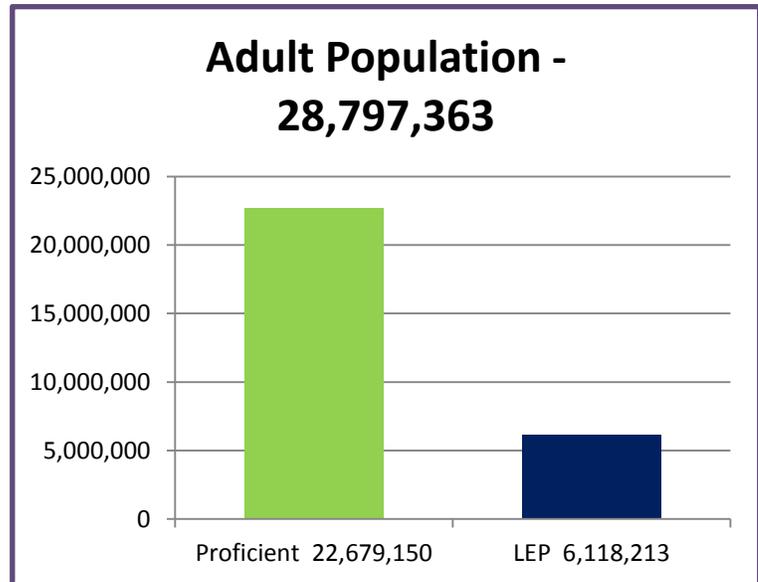
- ❖ **\$50,152 provided to consumers** – This figure was not tracked the first six months of 2013, but for the last six months that year, the funds totaled \$20,491. This figure includes adjustments to bills, waiving or lowering deposits, and financial assistance. There are federal, state, and some local government programs, which have specific funds to provide payments to investor owned utilities (IOUs) to help qualified applicants maintain utility services. Some nonprofits provide the same services, and each of the four major IOUs raise funds annually (through voluntary donations) to provide the same assistance.

This report concludes that in 2014, the CHANGES pilot was successful in the provision of its services to its client base. This is demonstrated through increased use of the service, the complexity of certain cases the CBOs resolved, the pilot's ability to change or increase its education and dispute components as situations arise, and the plethora of languages in which services are provided.



Background

According to the 2010 U.S. Census, more than six million, or 21 percent of California’s adult residents, have limited proficiency in English.³ Nationwide, California has the highest LEP population and the highest immigrant population at 27 percent. According to a report issued by the University of Southern California Population Dynamics Research Group, “The foreign born share of the population is higher in California, and the number larger, than any nation in the world with a



population of 10 million or more...”⁴ California’s high LEP population goes hand in hand with its immigrant population. California’s tendency to have a high LEP population is likely to continue, since according to the U.S. Census report, California remains the primary destination for immigrants in the United States.

Difficulty with understanding and communicating in English may create a barrier to learning about, and receiving the benefits of, consumer programs. To mitigate this, both state and federal requirements direct agencies and recipients of funding for programs to provide services in languages other than English.⁵ The CPUC, as well as the utilities it regulates, have taken measures to assist LEP consumers through bilingual staff, telephonic language centers, and collateral material in several languages. However, these measures do not provide hands on, one-on-one assistance to LEP consumers who do not read English or, for an assortment of reasons, are untrusting of government and large corporations to contact them for assistance.

³ California’s total population is 38,041,430. We are using statistics for the adult population because California has taken a stance that children should not be expected to interpret adult concepts for their parents.

⁴ Generational Projections of the California Population By Nativity and Year of Immigrant Arrival, p.13 http://www.usc.edu/schools/price/research/popdynamics/futures/2012_Pitkin-Myers_CA-Pop-Projections.pdf

⁵ Executive Order 1366 signed by President William Clinton in 2000 and California’s Dymally-Alatorre Bilingual Services Act.

In developing the CHANGES pilot, the CPUC determined it would model the pilot after an existing CPUC program that assists LEP consumers on telecommunications services and issues. That program is referred to as Telecommunications Education and Assistance in Multiple-languages (TEAM) and is managed by a contractor under the auspices of the CPUC's CSID. It provides Outreach, Education, and Complaint Resolution services to LEP consumers through a statewide network of CBOs, which are subcontracted by the contractor. The TEAM program was created as a result of formal proceedings in which the CPUC ordered that, "We believe that we can improve our complaint resolution efforts by working more with CBOs, which possess unique insights into problems faced by specific communities."⁶ In CPUC Decision D.07-07-043, Ordering Paragraph 13, staff was directed to "...design a program that integrates CBOs in the Commission's Outreach, Education, and Complaint Resolution processes..." In CPUC Resolution CSID-002, the CPUC established the TEAM program to meet the requirements in D.07-07-043.

The CPUC is relying on some of the CBOs in the TEAM program to also carry out the CHANGES pilot program because they speak the client's language, rather than relying on a computerized translator. CBO staff are often from the same countries as the communities they serve, enabling them to explain or translate issues with cultural sensitivity. In addition, the CBOs utilized are often the organizations that have already helped LEP consumers with other issues, such as housing, food, job referrals, and immigration requirements. For example, one CBO meets its clients as they first arrive in the United States and helps them with their basic needs; provides food, shelter, and in the days/weeks that ensue, the CBO helps them seek employment.

The CPUC determined it should adopt an energy-related pilot because since the beginning of the TEAM program, consumers who have visited CBOs for TEAM-related assistance have also requested help with energy issues and bills.⁷ As a result, CSID met with the four major IOUs, namely, Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), Southern California Edison (SCE), and Southern California Gas Company (SCG), to discuss creating a pilot program modeled after the TEAM program, to assist LEP consumers with natural gas and electricity services and bills. All of the IOUs were receptive to the endeavor and continue to assist CSID through active participation in refinement of the program's data collection and reporting, and attendance at monthly meetings.

CSID discussed funding for the pilot with then Commissioner Dian Gruenich's staff, Energy Division (ED) staff, and the Administrative Law Judge (judge) assigned to the CARE proceeding.

⁶ CPUC Decision D.06-03-013, p.101.

⁷ The TEAM contractor has stated this to CSID staff, several caseworkers involved in the TEAM program have stated this and CSID staff have experienced this request first hand while attending TEAM events.

It was determined that the pilot could be funded through CARE funds, as indicated in the California Public Utilities Code, Section 739.4 (b) (3), because the majority of the consumers to be assisted in this program were likely to have income levels that meet CARE eligibility requirements.⁸ It was also agreed that the pilot should evaluate whether an ongoing program, if adopted, should continue to be funded through CARE funds and if so, at what level.

As a result of the discussions, CSID drafted CSID-004 for CPUC consideration, and on November 19, 2010, the CPUC approved a one year pilot program. CSID-004 also set the funding for the year-long pilot at \$500,000 through the CARE Outreach budget. Payment would be made by the IOUs using the same proportions as other jointly funded programs as follows:

- ✓ PG&E – 30%; \$150,000
- ✓ SDG&E – 15%; \$75,000
- ✓ SCE – 30%; \$150,000
- ✓ SCG – 25%; \$125,000

The pilot utilizes the same contractor as it does for the TEAM program. However, because it is only a pilot and the funds are limited, only about 56 percent of the TEAM CBOs are participating in the CHANGES pilot. The CPUC will also evaluate if an ongoing CHANGES program should be combined with the TEAM program to provide full utility assistance services to the same clients.

From November 19, 2010 through January 2011, CSID, the contractor, and the IOUs developed the Scope of Work for the pilot and services began in February 2011.

In Resolution CSID-005, approved on November 10, 2011, CSID detailed the achievements of the pilot from February 2011 through September 2011 in compliance with CSID-004, which ordered CSID to recommend to the CPUC whether the pilot should continue. CSID reported that despite a certain amount of lag time due to a learning curve and for the pilot to produce results, the CBOs:

- ❖ Provided assistance in 17 languages.
- ❖ Helped more than 100 LEP clients apply for CARE, and assisted hundreds more to apply for financial assistance.

⁸ This was determined by looking at statistics generated from the database used for the TEAM program, which showed that 80% of TEAM clients reported that their yearly income was less than \$25,000 in 2010. At that time, income qualification for CARE began at \$31,300, so it is likely that the percentage of people who were CARE recipients is higher. Additionally, many of the CBOs conducted Outreach or workshops for seniors (another consumer group noted in Section 739.4).

- ❖ Educated 11,400 LEP clients about energy services and bills, which helped them lower their energy usage, avoid disconnections, and understand payment arrangements.
- ❖ Resolved 1,083 Needs and Disputes, such as signing people up for financial assistance, negotiating payment arrangements, and helping clients enroll in Energy Savings Assistance Programs.

CSID recommended that the pilot duration be extended to allow time for additional data collection and pilot evaluation, as well as time to review the appropriate CARE funding, if any. The Resolution also increased the funding level to no more than \$60,000 monthly for the next portion of the pilot. The increase was ordered because some of the CBOs were so successful that they were turning clients away. The Resolution also directed that CSID, ED, and an independent consultant review 12 months of data to evaluate the pilot and the benefits of the pilot's use of CARE funds.

The resulting independent evaluation was provided to CSID, ED, and the judge assigned to the CARE proceeding. While the evaluation laid some general foundation to confirm the need for the program, it did not provide sufficient review and analysis to determine if an ongoing program should be funded by CARE funds, whether wholly or partly. In CPUC Decision D.12-12-011, which was issued on December 26, 2012, the CPUC extended the pilot again, at the same funding level, until the end of the 2012-2014 CARE program cycle, or until alternate or complimentary funding can be put in place, whichever came first. The decision also directed improvements to the pilot's tracking, reporting, and program success criteria.

CSID, ED, the contractor, and the IOUs met regularly to develop the improvements. As a result, the contractor enhanced the CHANGES database and its monthly reports. CSID, ED, the contractor, and the IOUs created a working document detailing program components and their evaluation, and the IOUs developed two tables which became Tables 10 and 11 in their CARE monthly reports to the Commission.

The CARE proceeding for program years 2012-2014 concluded in 2014, prior to the Commission completing its review of CHANGES. Therefore in Decision D. 14-08-030, the Commission extended the pilot through calendar year 2015 and increased its funding to \$61,200 monthly to account for the cost of living.



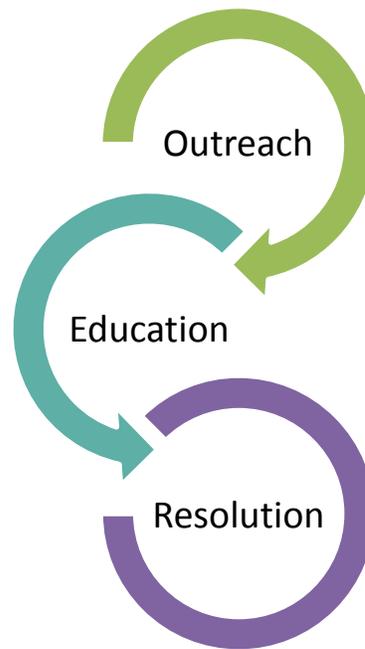
2014 CHANGES Activities

The CHANGES pilot contains three components that are interrelated (Outreach, Education, and Needs and Dispute Resolution). To assure that their constituents are provided with cultural sensitivity, the CBOs handle all four components with assistance from the contractor and lead staff, when necessary. This includes developing their own presentations, press releases, and interacting with the IOUs on behalf of the clients. Thus, the pilot provides a holistic approach to meeting Outreach, Education, and Needs and Dispute Resolution requirements of the LEP population.

Outreach advises the public of the existence of the program and encourages them to seek the CBO’s assistance.

Education provides awareness of utility services, issues, and consumer assistance programs. Education encourages clients to bring their bills and speak to a caseworker for one-on-one assistance with securing needs or resolving disputes.

Needs and Dispute Resolution allows the client to discuss the concerns with the caseworker, who provides direct assistance tailored to the situation and when appropriate, advocates on behalf of the client. A situation is considered a “Need” if the client indicates he or she has not made contact with the IOU, or if it appears to the caseworker that the client can be assisted without contacting the IOU. A situation is considered a “Dispute” if the client indicates he or she has contacted the IOU but the issue was not resolved to the client’s satisfaction.





❖ **3,334,175 Outreach Contacts, an increase of 1,560,989 from 2013**

- ✓ 3,238,365 consumers contacted through the media
- ✓ 95,810 consumers contacted through community events

The Outreach budget for the pilot is not sufficient to finance mass marketing. Additionally, marketing on a large, or even an average, scale was not considered because the pilot is limited in size and was careful to avoid attracting more people than it can assist. Instead, it was determined that CHANGES would use a simpler yet more direct approach of informing the public about the pilot by keeping Outreach within the local CBO community. The CBOs are compensated for attending two community events and two local media placements per year. However, the CBOs also promote the CHANGES services through signage at their CBO and other community locations, by contacting community leaders, such as elected officials, and also through word of mouth.

CBO staff attends community events and tells clients, who approach their booth, about the services they can receive from the CBO. CBO staff may also contact print or broadcast media, utilizing interviews or press releases, to inform the community of the existence of CHANGES at their organizations.⁹ The contacts are conducted in the language of the community(ies) that the CBO serves. The CBOs provide details and documentation to the contractor of how many people visited the CHANGES CBO table at events. If the Outreach was through media, the CBOs provide the contractor details pertaining to which media option they pursued, the particular media's subscribership, and if print media, a copy of the news clips.

CBOs which have established CHANGES client bases are not required to conduct Outreach. Instead, they may discuss a modification of their contract with the contractor to enable the CBO to use the Outreach funds for Education or Needs and Dispute Resolution.

Outreach is considered a success because clients have been attending the CHANGES Education Workshops and one-on-one assistance sessions (Needs and Dispute Resolution). To further measure the success of Outreach, the caseworkers ask the clients seeking help with Needs and

⁹ The media contact figure is based on each respective media's reported subscribership.

Dispute Resolution, how they heard of the program. The caseworker records the clients' responses in the "Referral Source" field in the CHANGES Needs and Dispute Resolution database. Of the Needs and Dispute Resolution cases, 299 or 18 percent had heard of the CHANGES pilot through community events or through the media. The year-to-date referral source table is included as Attachment D in this report.



- ❖ Workshops: 24,882 people attended, an increase of 10,589 from 2013
 - ✓ Assistance programs
 - ✓ Payment plans
 - ✓ Explaining the bill
 - ✓ Energy conservation
 - ✓ Avoiding disconnection
 - ✓ Safety
 - ✓ CARE customers with high energy use¹⁰
 - ✓ Selecting service from a Core Transport Agent¹¹

Education Workshops are where the caseworker provides information and engages a live audience to share their own experiences related to the subject. Most workshops are conducted at the CBO location, but often a caseworker will give a presentation at another organization or an adult school class, such as English as a Second Language (ESL) class. The eight workshop subjects are noted above. Workshop presentations and group discussions last at least 30 minutes. Afterwards, clients may arrange to visit the CBO for assistance, or when

¹⁰ Workshop added in late 2014

¹¹ Workshop added in late 2014

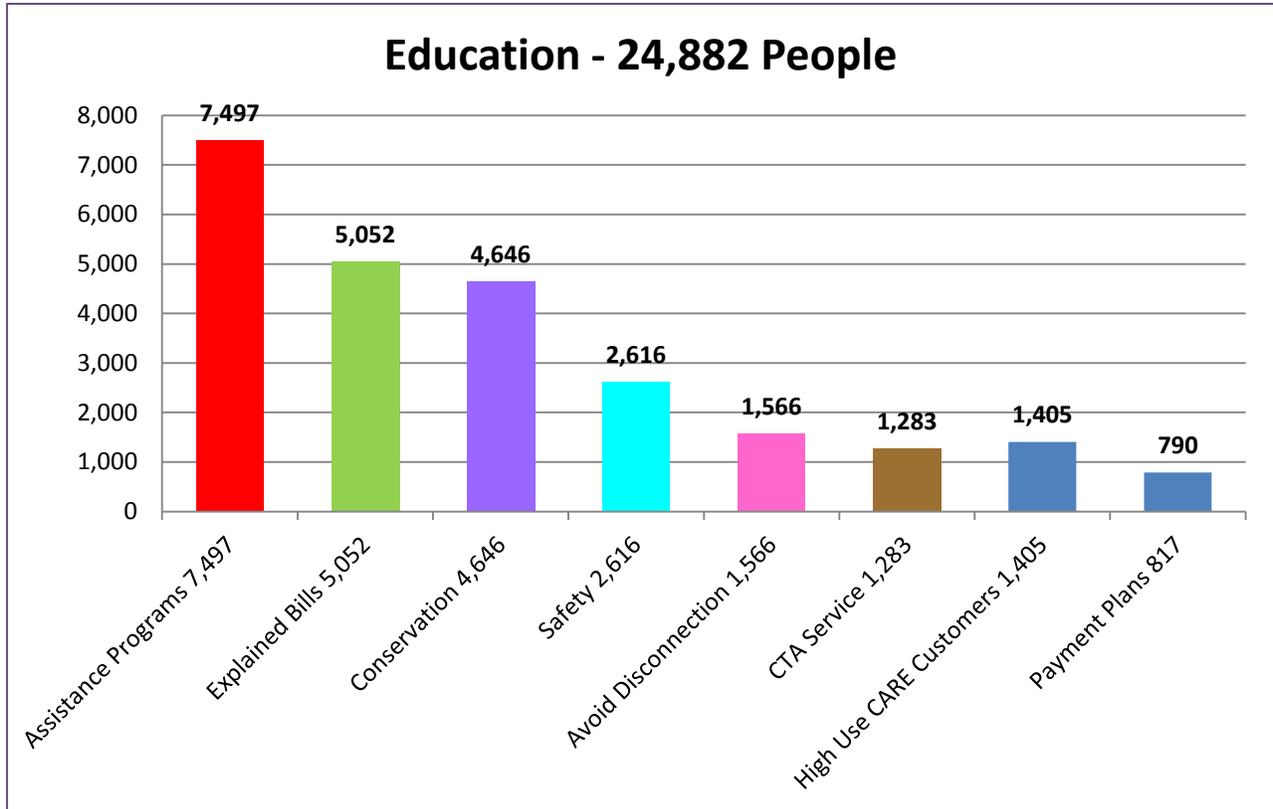
possible, receive immediate assistance, through the Needs and Dispute Resolution components.

Workshop success is measured by pre- and post-tests, where the caseworker asks a question or two about the issue before and after the workshop. Pre- and post-tests are conducted verbally and the contractor has indicated that the results have been positive. CSID has attended these CBO workshops and found the caseworkers to be well prepared and successful in engaging the audience. The group discussions encourage attendees to discuss their particular situations in a positive, nonthreatening environment. Many people who attended had also brought their bills and were seeking assistance resolving them or managing payments.

During the Education Workshops, clients have asked for collateral material in their language. Currently, the CBOs provide clients with the utilities CARE, Family Electric Rate Assistance (FERA), and Medical Baseline applications, and when available, they are provided in the client's language. If the pilot becomes an ongoing program, it should have its own branding and collateral materials to hand out. CSID did not pursue this for the pilot because creating the material and securing translations of them could have taken longer than the initial duration of the pilot, and the translation costs would have been prohibitive for what was expected to be a one year pilot.

In late 2014, two more workshops were added to keep up with recent energy issues. One workshop was about switching natural gas supply from IOUs to Core Transport Agents (CTAs). It was added in response to the several LEP consumers, who had been approached by CTAs, and the consumers were requesting an understanding of what that switch might mean as far as billing and receiving consumer services. The second workshop was added in response to the energy IOUs' new practices for CARE consumers who have usage that exceeds 400 percent of baseline. The workshop explains what the practice is, what consumers must do to respond to the IOUs requirements for high use CARE customers, and how to pursue a dispute should they be removed from CARE due to high use.

The chart below shows the attendance for each of the eight subjects for 2014.





- ❖ 1,473 Total Needs and Dispute Resolution Cases, an increase of 178 cases from 2013
 - ✓ 1.92 services per case
 - ✓ \$50,152 secured for consumers

The Outreach and Education components both attract clients to seek the CBOs' help in resolving Needs and Disputes. Generally, a situation is considered a "Need" if the client indicates he or she has not made contact with the IOU and needs help or if it appears that the client can be assisted without contacting the IOU. A situation is considered a "Dispute" if the client indicates he or she has contacted the IOU but the issue was not resolved to the client's satisfaction. Both Needs and Disputes are recorded in the CHANGES database. Statistical data is provided in the monthly reports and to the IOUs in the table format the IOUs developed.¹²

Early in 2013, CSID was reviewing closed cases in the database and discovered the database was recording only one service per case. However, caseworker notes in the database showed that the caseworkers were providing more than one service.¹³ Unfortunately, the database could not be changed to record more than one service without completely redesigning it; therefore, CSID has been reviewing the notes on all of the closed cases that were initiated beginning January 1, 2013 and is tracking all of the services provided to better evaluate the services being provided.

There are 31 different services with which a client can be assisted through the Needs and Dispute Resolution process, and we have attached a table as Attachment F that lists the 31 services and their corresponding statistics. However, in evaluating the services CSID

¹² The contractor completes basic information about the contact and the IOUs check their records and provide additional information, such as if the person is enrolled in CARE. To avoid duplicity, CARE enrollments are not compensated as part of the CHANGES program, since the IOUs already have a program (CARE Capitation) where they compensate CBOs to enroll customers in CARE. However, to provide "one stop shopping," for potential CARE recipients, the CHANGES CBOs are also included in the IOUs program.

¹³ For example, a client helped with enrollment into ESAP may also receive assistance avoiding disconnection.

determined they can be classified into six different types of assistance, as shown in the following table.

Needs and Disputes Services Related to Each Category					
Education	Assistance Programs	Avoiding Disconnection	Conservation	Manage Accounts	Schedule Service
Understanding a bill and Baseline	LIHEAP/HEAP	Avoiding disconnection	Consultation on Conservation	Third party notification	Request meter service or test
CARE/FERA	EAF	Payment extension		Verified bill	Schedule service visit
Medical Baseline	ESAP	Set Up/Change payment plan		Set up account	Schedule energy audit
All Assistance programs	GAF	Add or Modify Level Pay plan		Change account	
	N2N	Stop disconnection		Bill adjustment	
	Medical Baseline	Restore Service		Demand Response	
	REACH	Waive/decrease deposit		Core Transport Agents	
				CARE High Use	
				Safety	

Key:

CARE – California Alternate Rates for Energy – discounted service for qualifying low-income customers.

EAF – Energy Assistance Fund – SCE financial assistance program.

ESAP – Energy Savings Assistance Program – no cost weatherization for low-income households.

FERA – Family Electric Rate Assistance – discount for families earning slightly more than CARE levels.

GAF – Gas Assistance Fund – SCG’s financial assistance program.

Level Payment Plan – a client is billed the same amount year round.

LIHEAP / HEAP – Low Income Home Energy Assistance Program / Home Energy Assistance Program – Federal programs that provide financial assistance (HEAP), weatherization, and counselling.

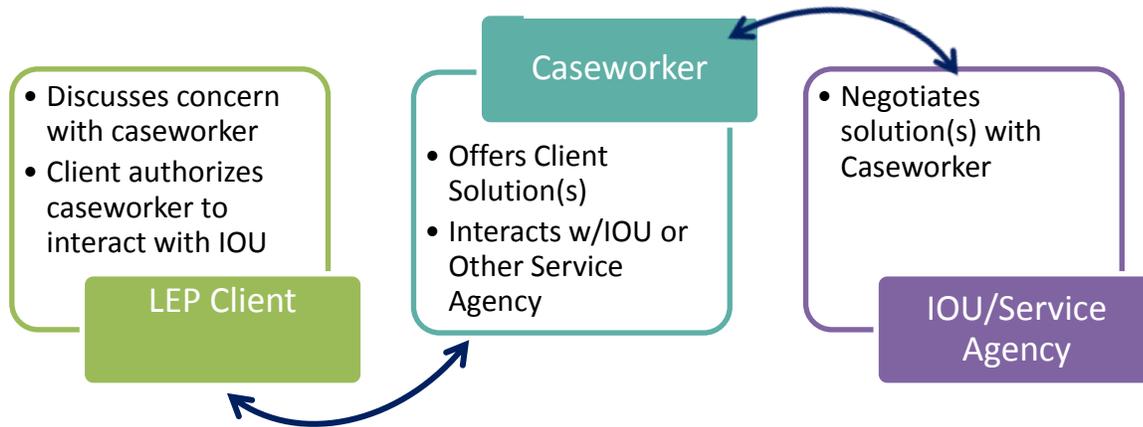
N2N – Neighbor to Neighbor – SDG&E’s financial assistance program.

Payment Extension – agreement to pay a bill on a specific date after the bill is due.

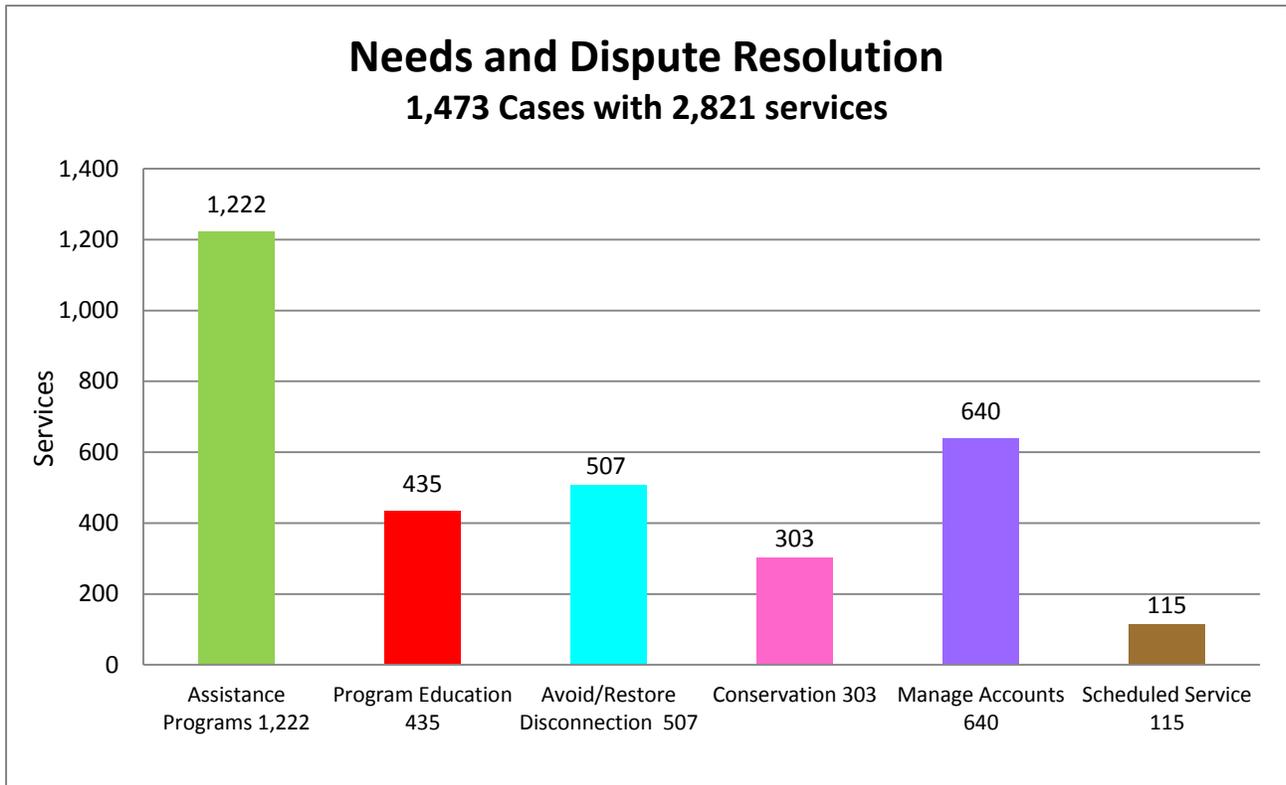
Payment Plan – arrangements to pay one bill in increments, such as \$50/month.

REACH – Relief for Energy Assistance through Community Help – PG&E’s financial assistance program.

Interactions between Client, Caseworker, and IOU/Service Agency



In general, Needs and Disputes receive similar treatment from the caseworker. A client discusses concerns with the caseworker, one-on-one, and the caseworker determines if he or she should contact the IOU or another agency for assistance. Then, the caseworker makes the appropriate contacts, continues to assist the client until the case is resolved, and notes the issue and the steps taken to resolve it in the database. For example, a client may meet with the caseworker with concerns that their energy service is going to be turned off because he or she cannot pay the bill. The caseworker may call a financial assistance agency to see if it can provide payment. If it can, the financial assistance agency will contact the IOU or just send in the payment. However, if the financial assistance agency will only be paying a portion of the bill, the caseworker will contact the IOU to negotiate payment arrangements, which are suitable to the client, on the total balance. Attachment G provides case notes of a few typical cases handled in 2014.



Needs and Disputes Successes

Based on several discussions with the contractor, the IOUs, and the CPUC's Energy Division, CSID determined the following criteria would be used to measure success of the Needs and Disputes components of the program:

- Assistance in the client's language.
- Assistance with or education about consumer programs.
- Assistance securing bill adjustments.
- Assistance securing payment arrangements.
- Assistance seeking financial assistance.
- Assistance avoiding disconnections.
- Assistance with securing other energy-related services, such as Medical Baseline.

CSID reviewed the 2014 data and determined the following successes:

1. 1,473 clients receive assistance in 44 languages.
2. 413 clients were assisted with enrollment, or educated about, consumer programs (services numbered 2, 6, 9, 10, 12, 23, and 24 on the attached Services Provided chart (Attachment F).
3. 7 clients received bill adjustments (service number 14 in Attachment F).
4. 200 clients received payment arrangements (services numbered 17, 18, and 28 in Attachment F).
5. 1,067 clients were assisted with financial assistance applications (services numbered 1, 2, 4, 5, and 27 in Attachment F).
6. 307 clients avoided disconnections, had service reconnected, or were educated on how to avoid disconnection (services numbered 7, 19, 21, and 22 in Attachment F).



Languages

- ❖ Communicated in 44 languages, an increase of 16 from 2013

The CPUC and the IOUs have taken measures to assist consumers in their preferred languages. The IOUs employ bilingual staff in their customer service departments, and the CPUC has certified¹⁴ several of its staff. When combined, the CPUC and IOU staff provides interpretation in 13 different languages.¹⁵ The CHANGES CBOs were able to communicate in 44 languages in 2014, both verbally and in writing. That is more than three times the amount of languages that



the CPUC and IOUs collectively provide through their staff. Also, the CBOs take great care to ensure that the communications are made with cultural sensitivity, as analogies and idioms that may make sense to English speaking customers, may make no sense to LEP consumers. For example, a fact sheet was including in a 2014 training session that explained CARE High Use, and some of the CBOs have taken great care in translating the salient parts of it and obtaining approval to use it in their workshops. The attached CBO list (Attachment C) shows the languages in which the CBOs communicate.

Both the IOUs and the CPUC contract with companies that provide language interpreters over the phone. However, those companies are directed to provide word-for-word interpretations and lack the training and experience that the CBOs have received on energy services and bills.

¹⁴ California State workers must pass its language exam to become certified interpreters or translators.

¹⁵ According to the IOUs response to a data request, they collectively provide verbal assistance in English, Spanish, Mandarin, Cantonese, Vietnamese, Tagalog, Korean, and Cambodian. The CPUC provides assistance in most of those same languages plus has certified interpreters for Arabic, Armenian, Farsi, Italian, and Russian.

Funding

The CHANGES pilot has been funded through the CARE program, as provided in the California Public Utilities Code, Section 739.4 (b) (3). The CPUC approved use of CARE funds because when evaluating the TEAM program, which CHANGES is modeled after, the CPUC discovered that most of the consumers assisted by TEAM had income levels that qualified for the California LifeLine service. Qualifying income levels for California Lifeline are lower than CARE; therefore, it was a reasonable assumption that the same client type is eligible for CARE. In fact, the Needs and Dispute Resolution data shows that 94% of all of the clients assisted up through 2014 have been CARE eligible. It is reasonable to assume that CHANGES will continue to be low-income, since a significant amount of LEPs are immigrants and according to a study by the urban institute, “Immigrants’ hourly wages are lower on average than those for natives, and nearly half earn less than 200 percent of the minimum wage - versus one-third of native workers.”¹⁶

Initially, the pilot was funded at \$500,000 a year (or \$41,667 a month). Payment to the contractor was provided directly by the IOUs at levels consistent with earlier CPUC decisions related to joint IOU funding. That was:

- ✓ PG&E – 30%; \$150,000
- ✓ SDG&E – 15%; \$75,000
- ✓ SCE – 30%; \$150,000
- ✓ SCG – 25%; \$125,000

In the first year, the CBOs were so successful in providing services that the funds did not last the entire year and some clients in need of services were turned away. In the second year, funding was increased up to \$60,000 a month and kept the IOUs’ contribution percentages the same. Through 2014, the CHANGES pilot has remained within that new budget; however, the pilot has limited statewide coverage. If the program becomes an ongoing program, the program and related funding should be expanded to bring more CBOs into the program and more services, allowing for better statewide coverage.

¹⁶ Immigrant Families and Workers, brief 4, p.1



Findings

After reviewing the CHANGES pilot activities for the 2014 calendar year, CSID finds (by category)¹⁷:

1. **Outreach**: Outreach generated interest in the program. This is determined by an increase in attendance at Education Workshops, as well as indications in the CHANGES Needs and Dispute Resolution database that clients had learned of the service through an assortment of Outreach approaches.
2. **Education Workshops**: Attendees were attentive and engaged. Pre-and post-tests indicated attendees gained knowledge. The issues discussed are important to CARE eligible clients because they helped people keep their bills as low as possible. They encouraged people to enroll in services like CARE, FERA, ESAP, LIHEAP, and Medical Baseline and assisted in securing financial assistance when necessary. Several workshops taught them how to avoid disconnection, including prompt payment of bills, level payment plans, payment arrangements, and payment extensions. The one workshop that does not directly help them keep service on, relates to safety. Safety is a priority at the CPUC and with the IOUs, so we will continue this workshop as an important component to Education.
3. **Needs and Dispute Resolution**: Clients were assisted with enrolling in consumer programs, avoiding disconnection, securing financial assistance, receiving bill adjustments, and turning on or restoring service. Even in instances where the client could not be helped (such as when it may be determined that the bill is accurate), the caseworker still discussed ways the client could avoid future high bills and interviewed the client to determine if they may qualify for other energy related assistance programs.

¹⁷ A 2013 and 2014 comparison chart is attached (Attachment B).



Attachments

- ❖ Attachment A – California Public Utilities Code, Section 739.4
- ❖ Attachment B – CHANGES Pilot 2013 and 2014 Comparison Chart
- ❖ Attachment C – CHANGES Pilot CBO List
- ❖ Attachment D – CHANGES Pilot Referral Sources
- ❖ Attachment E – CHANGES Pilot 2014 Languages List
- ❖ Attachment F – CHANGES Pilot Services Provided
- ❖ Attachment G – Sampling of CHANGES Pilot Closed Cases in 2014

Attachment A - California Public Utilities Code, Section 739.4

739.4.

(a) Any natural gas customer who enrolls in the CARE program after the effective date of this section, but before October 1, 2001, shall receive the same one-time bill credit based on the amount of each gas corporation's average CARE customer discount applied for each month in October 2000 to March 2001, inclusive. The credit does not apply to a customer who initiates service with a gas corporation after the effective date of this section, and who has no prior history of service with the gas corporation. CARE program funds shall be used for the purpose of providing these credits. The commission shall adjust CARE program income requirements annually to reflect the increased cost-of-living due to inflation.

(b) The commission shall require all electrical and gas utilities through which CARE program rates are available to do all of the following, in multilingual formats to the extent printed and recorded information is provided, to facilitate better penetration rates for the CARE program and to protect low-income and senior households from unwarranted disconnection of necessary electric and gas services:

(1) Provide an outgoing message on all calls, where the customer is seeking to establish service or is put on hold, to customer service lines that briefly describes the CARE program in standard language approved by the commission, and that provides a toll-free phone number for customers to call to subscribe to the program or for further information.

(2) Provide information to customers about the CARE program and facilitate subscription to CARE, on all calls in which customers are making payment arrangements, on all collections calls, and on all calls for reconnection of service.

(3) (A) Provide information about the CARE program and other assistance programs, and attempt to qualify customers for CARE, and provide information about individual payment arrangements that allow customers to pay the amounts due over a reasonable period of time, not to exceed 12 months, and attempt to enroll customers in a payment arrangement program, before effecting any disconnection of service for nonpayment or inability to pay energy bills in full.



Attachment B – Changes Pilot 2013 and 2014 Comparison Chart

COMPARISON CHART		
	2013	2014
Outreach	1,773,186	3,334,175
Contacted through media	1,609,800	3,238,365
Contacted through community events	163,386	95,810
Education	14,293	24,882
Assistance Programs	4,013	7,497
Explained Bills	3,820	5,052
Conservation	2,895	4,646
Safety	1,542	2,616
Avoid Disconnection	1,233	1,566
Payment Plans	790	817
Gas Aggregation	-	1,283
CARE and High Energy Use	-	1,405
Needs and Dispute Resolution	1,295	1,473
Total Services	2,902	2,821
Services Per Case	2.2	1.92
Amount Secured for Consumers	\$20,491.00*	\$50,151.92
Assistance Programs	1,167	1,222
Conservation	358	303
Avoid/Restore Disconnection	430	507
Manage Accounts	234	640
Program Education	598	435
Scheduled Service	115	34
Language		
Languages transacted	28	44

*Amount covers the last six months of 2013 (July-December)

Attachment C – CHANGES Pilot CBO List

LIST OF CBOs IN CHANGES PILOT PROGRAM	
PG&E	
Asian Community Center (ACC Park City)	
Languages: Cantonese, Hmong, Korean	
Central California Legal Services, Inc.	
Languages: Spanish	
El Concilio of San Mateo County	
Languages: Spanish	
Lao Khmu Association, Inc.	
Languages: Cambodian, Cantonese, Hmong, Laotian, Mandarin, Vietnamese	
Self-Help for the Elderly	
Languages: Cantonese, Mandarin, Russian, Spanish, Tagalog, Taiwanese, Toisanese, Vietnamese	
Southeast Asian Community Center	
Languages: Cantonese, Mandarin, Vietnamese	
Suscol Intertribal Council	
Languages: Native American English, Spanish	
San Diego Gas & Electric Company	
Casa Familiar	
Languages: English, Spanish	
Alliance for African Assistance	
Languages: Arabic, Spanish, Karen	

Southern California Edison & Southern California Gas Company
Asian American Educational & Cultural Center, Inc.
Languages: Cambodian, Cantonese, Hmong, Indonesian, Japanese, Korean, Laotian, Mandarin, Sign Language, Spanish, Tagalog, Thai, Vietnamese
Vietnamese Community of Orange County, Inc.
Languages: Vietnamese
Campaign for Social Justice
Languages: Arabic, Armenian, Bosnian, Croatian, Dari, Farsi, Korean, Pashto, Persian, Russian, Spanish, Urdu
Chinatown Service Center
Languages: Cantonese, Korean, Mandarin, Spanish, Toisanese
Delhi Center
Languages: Spanish
International Institute of Los Angeles
Languages: Cantonese, Farsi, Spanish, Vietnamese
Koreatown Youth & Community Center
Languages: Korean, Spanish
Little Tokyo Service Center
Languages: Chinese, Japanese, Korean, Spanish, Thai
People CORE's
Languages: Cambodian, Cebuano, Chinese, Ikokano, Korean, Spanish, Tagalog, Vietnamese
Pilipino Workers Center
Languages: Tagalog

Attachment D – CHANGES Pilot Referral Sources

REFERRAL SOURCES USED		
Referral Source	2013 Y-T-D	2014 Y-T-D
Consumer Participates in Another Program at the CBO	340	428
Consumer was in a CHANGES Educational Workshop	398	440
Consumer Received TEAM Services	133	82
Consumer Received Program Information at a Community Event	88	139
Consumer Learned of the Program through Newspaper, Radio, or Television	71	160
Consumer was Referred by Friend or Family	265	304
Consumer was Referred by Another CBO	74	81
Unknown	84	0

Attachment E – CHANGES Pilot 2014 Languages List

CHANGES PILOT 2014 LANGUAGES				
<i>Consumer Education, Needs, and Disputes</i>				
Language	Education Y-T-D	Needs Y-T-D	Disputes Y-T-D	Total Y-T-D
Amharic	3			3
Arabic	1,037	62	37	1,136
Armenian	18	1		19
Assyrian	6			6
Bangala		1	1	2
Bengali	2			2
Burmese	29	9	1	39
Cantonese	2,504	292	19	2,815
Chaldean	19			19
Croatian	1			1
Dari	56	4		60
English	1,199	254	79	1,532
English (Native American)	1,770			1,770
Farsi	88	3	2	93
French	1			1
German	1			1
Hindi	1			1
Hmong	122	9	4	135
Ilokano	106			106
Indonesian	10			10
Japanese	609	1		610
Karen	2			2
Khmer	538	56	117	711
Korean	956	647	1	1,604
Laotian	352	11	7	370
Mandarin	98	5		103
Nepali	3	1		4
Pashto	6	4		10
Persian		2		2
Polish	1			1
Punjabi	2			2
Romanian	1	1		2
Russian	30	1		31
Somali	7	4	3	14
Spanish	7,030	286	83	7,399

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Swahili	2	6		8
Tagalog	4,450	29	8	4,487
Thai	36	2		38
Turkish	3			3
Twi		1		1
Ukrainian	2			2
Urdu	3	3		6
Vietnamese	2,401	195	33	2,629
Visayan		4		4
Total	23,505¹⁸	1,894	395	25,794

¹⁸ This amount of people is lower than what is shown under the Education section because, in some instances, more than one workshop session was provided to the same group of people.

Attachment F – CHANGES Pilot Services Provided

CHANGES PILOT SERVICES BREAKDOWN	
1. HEAP/LiHEAP Application Assistance	827
2. Energy Assistance Fund Application	46
3. ESAP Application Assistance	85
4. Gas Assistance Fund Application Assistance	106
5. N2N Application Assistance	81
6. Medical Baseline Application Assistance	70
7. Educated on avoiding disconnection	65
8. Educated on how to read the bill	154
9. Educated on CARE/FERA	83
10. Educated on Medical Baseline	9
11. Educated on Energy Efficiency/ Conservation	303
12. Educated on all energy assistance programs	189
13. Request Meter Service or Testing	23
14. Bill Adjustment	7
15. Scheduled Customer Service Visit	8
16. Scheduled Energy Audit	2
17. Set Up/Change Payment Extension	63
18. Set Up/Change Payment Plan	132
19. Stop Disconnection	176
20. Verified Bill	38
21. Waive/Decrease Deposit	35
22. Restore Service	31
23. Sign up for 3rd Party Notification	16
24. Enrolled in Demand Response Programs (electricity)	0
25. Set Up Account	76
26. Changes to Account	157

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27. REACH Application Assistance	7
28. Add or Modify Level Pay Plan	5
29. Core Transport Agents*	26
30. CARE High Use Customers*	-
31. Safety*	1
Total Resolutions	2821

*The last three services were added in December 2014



Attachment G – Sampling of CHANGES Pilot Closed Cases in 2014

CHANGES PILOT CLOSED CASES IN 2014		
CASE	LANGUAGE	CASE NOTES
CASE 1	TAGALOG	<p>The customer came to the United States as an immigrant and spoke mostly a different language. This is the first time that the customer's family has considered having someone review their bill with them and help them understand it. CBO determined that the family does not qualify for discount programs. We offered to look over ways for them to better manage their monthly payment. We educated them as well on how to log in to their online account, how to use the interactive tools to help them see their daily energy use and projected monthly bill and explained in Tagalog what the details of their bill mean. We introduced the family to level pay plan and told them how this option might help them create a better monthly budget on their bills. Customer was highly interested in choosing this payment option. Called customer service to determine what the customer's monthly base payment will be if they enroll in the level pay plan. Their monthly base payment will be \$55 for their next billing cycle if they enroll now. CBO connected the customer to IOU representative for authorization in payment plan. After educating the customer on how to understand their bill and how to access their daily energy usage and projected monthly bill online, CBO introduced the level pay plan and customer became interested. After having IOU evaluate their monthly base amount, customer approved it and we arranged for their authorization to change their payment plan. CBO also gave customer resources on how to be more energy efficient in their home to avoid high energy usage for a possibility of getting credit towards the end of their level pay plan year.</p>
CASE 2	KHMER	<p>The client came over with her PG&E bill and addressed that Glacial Natural gas is the new provider. She feels that her gas bill has extremely increase, since she switch. She speak limit English and want my help in cancelling service. I looked at the bill and added all the gas procurement credit. She is being over charge for \$3.84 extra and \$46.08 a year. I call to Glacial and spoke with Anthony. I explain to Anthony about the client request. Anthony instructed me to send him an email and he will cancel the account with them. The email includes, the client information and PG&E account number. I went ahead and email it to him and Anthony respond right always. His email stated that the cancellation is confirmed and he will proceed to drop the account. Case is now able to be close.</p>

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- CASE 3** SPANISH I requested payment plan at first, she stated client had to pay \$499.21 to keep services on, I requested supervisor. Transferred to supervisor Bonnie , I requested a breakdown of why bill so high, according to Bonnie client had a deposit fee added to bill after last shut off, client did pay approx \$900 in May, apparently is from old bill client signed for sister in law. I explained to Bonnie client applied for LIHeap and pending, she stated could only lower bill to \$300.00 to avoid shut off and do rest in payment, if EOC paid \$342.00 client would have to pay the \$159.88. I then called EOC and spoke with supervisor Gilda and requested her assistance in expediting application, she stated if client had 48 notice she could contact PG&E and do a promisory via phone. Client went to PG&E and got copy of 48 notice, I then faxed to EOC and Gilda called back stating she did the promisory via telephone. Client was able to pay only \$80.00 and the rest in payments once confirmation received from PG&E that she paid the \$80.00
- CASE 4** SWAHILI Client came into my office as a last resort. He said he had received a disconnect notice and showed me his bill of close to 400 dollars. The client was a Somali refugee with a limited income who had just had a child that month. The client was clearly scared so I immediately went over his options with him. I decided CUI would be his best option but called the Changes hotline to see if we could get the disconnection changed. Upon calling the Changes hotline we spoke with Erika. I asked about the disconnect notice my client had received and the CSR said that there was never a disconnect noticed but that my client could be disconnected soon. I found this to be very confusing and asked for clarification. The CSR stated that the client wouldn't be disconnected until October but should handle the situation as soon as possible. I asked if CUI would be the best option and the CSR agreed that would be the best course of action. I counseled the client on what CUI was and provided him with all the information he would need to insure that he was prepared for the process. The client was very relieved that his electricity was not being turned off yet and said he was excited by the prospect of the HEAP assistance. The client went to CUI and received \$397.84. He was very thrilled that we could help him find a program that could assist him in his time of need.
- CASE 5** CANTONESE Client attended CHANGES community outreach event and got to know about low-income programs available. She wanted applying for LIHEAP. I helped her complete the application form since she cannot read English, and helped client made copies of all verifications docs needed.



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- CASE 6** VIETNAMESE Client's income is low. He really needs payment assistance to avoid disconnection. CBO explained how to avoid disconnection, and helped client to apply for HEAP with Community Action Partnership of Orange County. Helped client to understand Level Pay Plan, and Safety.
- CASE 7** LAOTIAN The client is here today complaining, about being trick into switching to another gas company. She does not speak or read in English. Her native language is Lao. The new gas company name is Commerce Energy. The client lives in an apartment and should not be charge any gas services. The client is very upset and feels like she has been taken advantage, because she does not speak English. I looked at the client PG&E and notice that she is being charge \$2.95 a month for monthly fees. I told the client that I will help resolve this matter. I will also help her enroll in the medical baseline application. Client has many illness as well, that makes her qualified. I proceed to call to Commerce Energy and spoke to Shelly. I told Shelly that the client request to cancel and that she had no idea on what she was signing. Shelly said that the client is on a two year contract. I told her that the client is not using the gas account and she is getting a monthly charge every month. I explain to her that the client lives in an apartment and the landlord is the one taking care of all gas charges in her area. Shelly is very rude and said that there is nothing she can do. The client sign up for it and then she hung up on me. I called back and spoke to Denise at Commerce and explain everything to Denise. Denise was very nice and give me instruction on how to clear this matter up. She told me to type a letter for the client and have the client sign. This letter is to request to cancel and it state that the client does not speak English. After, have the client sign and fax back to her office. After, they receive the fax. This will be cancel without a \$50.00 early termination fee. The client is on a two contract and the contract will be remove. The client will then be transfer back to PG&E. I went ahead and started the letter. I then fax the letter Commerce Gas and fax was sent. The client was so happy, after that everything is finish. Client will be saving \$35.40 a year and will not switch again. The recovered amount was entered. Case is now able to close.