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# CALIFORNIA DEPARTMENT OF COMMUNITY SERVICES AND DEVELOPMENT CALIFORNIA ARREARAGE PAYMENT PROGRAM (CAPP) CAPP PROGRAM NOTICE NO. 2021-03-R2

The purpose of this official correspondence is to provide implementation information and guidance to the general public and state energy utility service providers regarding the California Arrearage Payment Program (CAPP) administered by the Department of Community Services and Development (CSD).

#### **CAPP PROGRAM NOTICE NO. 2021-03-R2**

TO: ALL ENERGY UTILITY COMPANIES

SUBJECT: CALIFORNIA ARREARAGE PAYMENT PROGRAM (CAPP)

UTILITY SURVEY-CLARIFICATION

DATE: September 15, 2021

REFERENCE: Government Code Section 16429.5

Assembly Bill 135 (Chapter 85, Statutes of 2021)

The purpose of this CAPP Program Notice (CAPP-PN) is to notify eligible energy utilities of changes to CAPP Utility Survey requirements outlined in CAPP-PN 2021-02 dated August 2, 2021 and revised in CAPP-PN 2021-03 dated August 20, 2021 and CAPP-PN 2021-03R dated September 9, 2021.

<u>Please Note</u>: This revision applies only to the Southern California Edison (SCE) investor-owned utility (IOU) and Community Choice Aggregators (CCAs) that operate within the service territory of SCE.

As a result of ongoing discussion and collaboration between CSD, SCE, and their partner CCAs, it has been determined that in order to effectuate timely and accurate reporting of qualifying CCA customer arrearages to the CAPP Utility Survey, CSD will establish an alternate reporting option to allow SCE CCA's to self-report qualifying arrearages for CCA customers. Under this alternate reporting option, SCE will maintain responsibility for submitting a CAPP Utility Survey response reflecting qualifying arrearages for its customers (excluding generation charges for CCA customers). CCAs will maintain responsibility for submitting a separate CAPP Utility Survey response reflecting qualifying arrearages for CCA customers (including qualifying arrearages associated with account receivables returned by SCE).

It is essential that SCE and its partner CCAs review and immediately apply the updated guidance outlined in this Program Notice and further detailed in the matrix below.

Please be advised the updated guidance is effective with the issuance of this program notice, and SCE and partner CCAs must complete the CAPP Utility Survey in the CSD CAPP Portal by September 16, 2021.

#### **Summary of Changes:**

### Current Process as Outlined in CAPP-PN 2021-03

## CCA utility arrearage data will be captured via the two following methods:

#### 1. CCA Arrearage Data Tracked by IOUs

- Will be captured on the CAPP
   Supplemental CCA Account Form and
   submitted to each CCA along with an
   explanation of the parameters used by
   the IOU to identify and compile utility
   arrearage data for CCA customers. IOUs
   will forward completed CAPP
   Supplemental Account Forms to CCAs no
   later than September 9, 2021 for review
   and acceptance.
- CCAs must complete their review and submit the CAPP Supplemental CCA Account Form and required attestation via the CAPP Portal by September 16, 2021.
- For reference, the CAPP Supplemental CCA Account Form is designed to capture the following CCA customer and utility arrearage data tracked within IOU customer billing systems:
  - a. Total number of residential CCA electric accounts serviced by the energy utility;
  - Total number of commercial CCA electric accounts serviced by the energy utility;
  - c. Total number of residential CCA accounts with past due balances of 60 days or more incurred during the COVID-19 pandemic relief period as defined in CAPP-PN 2021-03;
  - d. Total number of commercial CCA accounts with past due balances of 60 days or more incurred during the COVID-19 pandemic relief period as defined in CAPP-PN 2021-03;

## Revision – SPECIFIC TO CCAs THAT PARTNER WITH SCE

Utility arrearage data for CCAs that operate within SCE territory will be captured via the following method:

#### 1. CCA Arrearage Data

- CCAs operating within SCE service territory will be required to complete the CAPP Utility Survey in the CSD CAPP Portal no later than September 16, 2021.
- Data to be captured in the CAPP Utility Survey includes but is not limited to the following:
  - Utility name and types of services provided
  - Total residential and commercial arrearages associated with CCA generation costs
  - Residential customer accounts with arrearages associated with CCA generation costs and at risk of disconnection
  - Active residential customer accounts with arrearages associated with CCA generation costs
  - Inactive residential customer accounts with arrearages associated with CCA generation costs
  - Commercial customer accounts with arrearages associated with CCA generation costs
- CCAs must submit the CAPP Survey and required CAPP Attestation Form no later than September 16, 2021 in the CAPP Portal.

#### 2. SCE Arrearage Data

 SCE will complete the CAPP Utility Survey utilizing only residential and commercial

## Current Process as Outlined in CAPP-PN 2021-03

- e. Total aggregate arrearage balance for all residential CCA accounts with past due balances of 60 days or more incurred during the COVID-19 pandemic relief period as defined in CAPP-PN 2021-03;
- f. Total aggregate arrearage balance for all commercial accounts with past due balances of 60 days or more incurred during the COVID-19 pandemic relief period as defined in CAPP-PN 2021-03.
- CCA Arrearage Data Not Captured by IOU Customer Billing Systems and Tracked Solely by CCAs
  - For accounts receivables that have been "returned" to CCAs as bad debt and that are no longer tracked by IOU billing systems, CCAs must complete and submit a CAPP Survey to account for this specific utility arrearage or account receivable.
  - CCAs must submit the CAPP Survey and required CAPP Attestation Form no later than September 16, 2021 in the CAPP Portal.

## Revision – SPECIFIC TO CCAs THAT PARTNER WITH SCE

- customer arrearage data that excludes all arrearages associated with CCA generation costs for CCAs that operate within their service territory and that are currently tracked within their billing system.
- SCE must submit the CAPP Survey and required CAPP Attestation Form for their own customer arrearage data (not to include arrearages associated with CCA generation costs) no later than September 16, 2021 in the CAPP Portal.

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All CAPP-PNs, along with release dates of crucial CAPP implementation phases and energy utility responses are posted on CSD's public-facing website.

If you have questions or need additional guidance regarding CAPP, please contact CSD at CAPP@csd.ca.gov.

Sincerely,

DAVID SCRIBNER

Director