

Consumer Affairs Branch

FOURTH QUARTER REPORT-2022

March 7, 2023



**California Public
Utilities Commission**

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ABOUT THIS REPORT

This quarterly report highlights consumer issues related to communications, electric, natural gas, and water utilities regulated by the California Public Utilities Commission (CPUC).

Unless otherwise noted, the data presented in this report are based on inquiries and complaints received by the Consumer Affairs Branch (CAB) from October through December 2022.

This report details:

- [CAB Returned More Than \\$549,000 to Consumers in the Fourth Quarter of 2022](#)
- [CAB Received Over 4,700 Consumer Contacts](#)
- [CAB Assisted About 1,800 Consumers Resolve Complaints](#)
- [Energy Utilities 2022 Recap with Q4 Highlights](#)
- [Telecommunications Utilities 2022 Recap with Q4 Highlights](#)

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ABOUT THE CONSUMER AFFAIRS BRANCH

The Consumer Affairs Branch (CAB) resides within the News and Outreach Office at the CPUC. CAB is responsible for supporting the diverse needs of consumers. CAB provides the following services:

- Resolves consumer questions or complaints about their regulated communications, natural gas, electric, and water utility services.
- Resolves appeals for California LifeLine, a discounted phone program.
- Administers Limited English Proficiency (LEP) programs that assist consumers with telecommunications and energy issues.

- Analyzes complaint data to assist CPUC decision-makers, supports enforcement against fraud and abuse and inform the public.

CONSUMER REFUNDS – CAB Returned \$549,254 to Consumers

In the fourth quarter of 2022, consumers were reimbursed **\$549,254** from the utilities by reaching out to CAB and utilizing the **Informal Complaint (IC)** process. An IC is a written consumer contact expressing dissatisfaction with or a dispute with an action or practice that is regulated through tariffs, rules, orders, or any other form of authority that originates from the CPUC.¹

Many of the refunds were the result of incorrect billing and were disbursed by the utility following CAB’s involvement. The average refund in Q4 by industry: Communications **\$384**, Energy, **\$3,120**, Water, **\$135**.

Table 1: Consumer Refunds by Industry² and Quarter

Industry	Q1	Q2	Q3	Q4	YTD
Communications	\$336,764	\$121,578	\$137,585	\$99,029	\$694,956
Energy	\$460,506	\$394,235	\$425,366	\$431,915	\$1,712,022
Water	\$3,613	\$5,425	\$4,344	\$19,435	\$32,817
Totals	\$800,883	\$521,238	\$567,295	\$550,379	\$2,439,795

Fourth Quarter Refund Highlights

- CAB received a consumer complaint stating concerns with a high bill stemming from a leak at their residence which was detected and repaired. CAB presented the matter to San Jose Water Company, and they agreed to grant a courtesy adjustment of **\$806**.
- A consumer contacted CAB stating that they had been over billed by Southern California Edison Company and that they were placed on the wrong Net Energy Metering billing rate. They stated that multiple attempts to contact the utility about their concerns did not produce any results. After filing an Informal Complaint with CAB, the utility issued a check to the consumer for **\$4,537**.
- After attempting to contact AT&T to dispute charges that increased from **\$327 to \$999** per month, the consumer contacted CAB. As a result, the utility made the appropriate corrections to the account and credited the consumer **\$963**.

¹ In comparison to an IC, the CPUC has a Formal Complaint (FC) process. A FC is a written legal document that claims a utility regulated by the CPUC has violated state laws or the CPUC’s orders or rules. A FC describes these violations, the injury suffered, because of them, and the resolution requested from the CPUC and is overseen by an Administrative Law Judge. CAB focuses on ICs and presents results of Q4 in this report.

² This table only accounts for refunds through the Informal Complaint process. Cases where a phone contact was transferred to a utility for expedited resolution are not reflected here.

CAB RECEIVED OVER 4,700 CONSUMER CONTACTS

CAB’s team of representatives are responsible for assisting consumers with answering questions and resolving disputes with their utility providers. These contacts are received via phone calls, letters, or the Internet. In the fourth quarter of 2022, CAB received **4,782** contacts, see **Figure 1**.

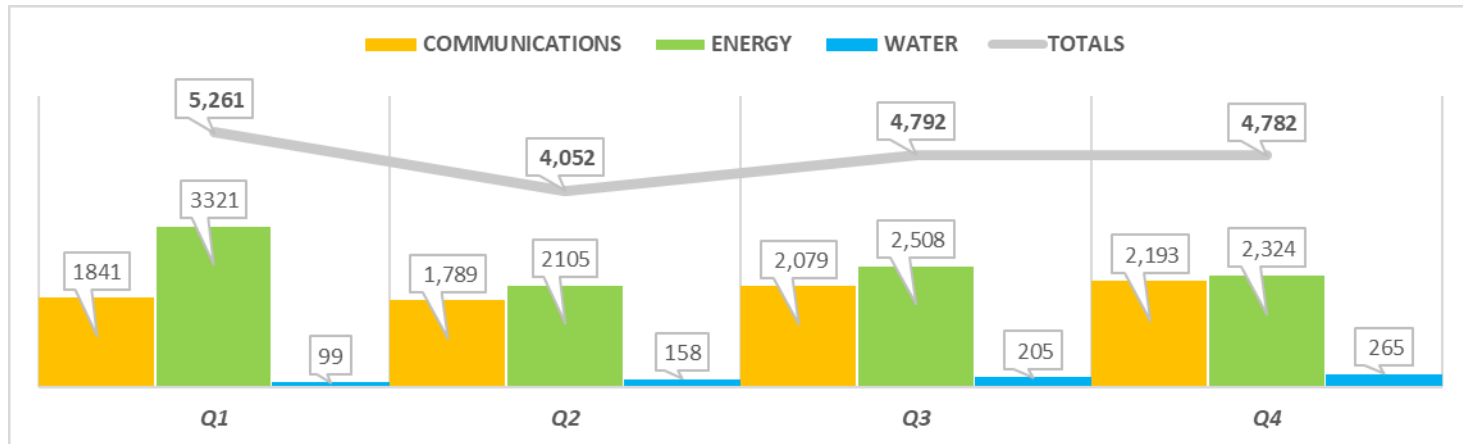


Figure 1: Consumer Contacts by Industry and Quarter

Across all industries, communications, energy, or water, billing issues accounted for **39 percent** of the contacts, followed by service issues at **20 percent**, see **Table 2**. Within the Billing category, the subcategory High Bill accounted for **46 percent** of the contacts and within the Service category, **36 percent** of the contacts were attributed to the subcategory Delayed Orders/Missed Appointments, followed by Outage, at **35 percent**.

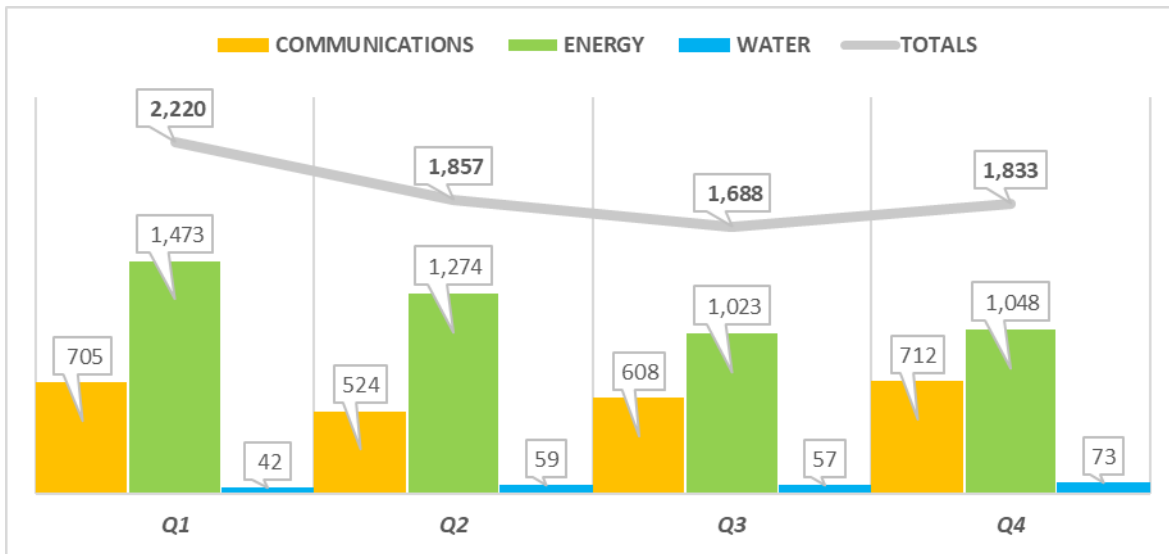
Table 2: Consumer Contacts by Category and Industry

Category	Communications	Energy	Water	Total	% of Total
Billing	544	1,158	155	1,857	39%
Service	484	387	51	922	19%
Not Regulated - No Jurisdiction	398	244	40	682	14%
Lifeline	649	n/a	n/a	649	14%
Policy and Practices	86	230	10	326	7%
Public Purpose Programs	2	222	1	225	5%
Unknown	27	19	5	51	1%
Rates	3	64	3	70	1%
Totals	2,193	2,324	265	4,782	100%

CAB ASSISTED 1,833 CONSUMERS RESOLVE COMPLAINTS

CAB’s Informal Complaint process allows consumers an easily accessible way to resolve disputes with their utility. In the fourth quarter of 2022, CAB resolved **1,833** Informal Complaints, see **Figure 2**.

Figure 2: Informal Consumer Complaints Resolved by Industry and Quarter



Across all industries, billing issues accounted for **50 percent** of Informal Complaints sent to the utilities, with service issues at **29 percent**, see **Table 3**.

Table 3: Informal Consumer Complaints Resolved by Category and Industry

Category	Communications	Energy	Water	Total	% of Total
Billing	257	601	54	912	50%
Service	260	257	12	529	29%
Policy and Practices	44	76	7	127	7%
Public Purpose Programs	0	114	0	114	6%
Lifeline	151	n/a	n/a	151	8%
Totals	712	1,048	73	1,833	100%

ENERGY UTILITIES 2022 RECAP with Q4 HIGHLIGHTS

This report compares the consumer contacts CAB received in 2022 for all energy utilities and more specifically, the “Top-10” utilities. In this case, being a member of the Top-10 means that CAB received the most contacts for these companies over all other energy companies regulated by the CPUC. This report also breaks out Q4 activity for these companies.

Energy Consumer Contacts Calendar Year 2022 and Q4 2022

CAB received a total of **11,102** contacts related to **66** energy utility companies in 2022. The Top-10 energy utilities account for **95 percent** of the total energy contacts. Of those companies, Southern California Edison is the number one complaint getter for 2022 as consumers responded to multiple issues related to its billing system cutover in 2021.³ **Table 4** below shows the breakout of the Top-10 Energy Utilities by count and percent of the total.

Table 4: Top-10 Energy Utility Contact Statistics

Contacts	Calendar Year 2022	Percent of Total	Q4 2022	Percent of Total Q4
Total Energy Contacts	11,102	100.0%	2,573	100.0%
Total Top-10 Energy Contacts	10,521	94.8%	2,438	94.8%
Top-10 Utility Name				
Southern California Edison Co.	4,483	40.4%	1,165	45.3%
Pacific Gas & Electric Co.	3,184	28.7%	766	29.8%
San Diego Gas & Electric Co.	1,455	13.1%	211	8.2%
Southern California Gas Co.	715	6.4%	116	4.5%
Spark Energy Gas LLC	163	1.5%	65	2.5%
SFE Energy Inc.	162	1.5%	29	1.1%
Bolt Energy Services LLC	139	1.3%	9	0.3%
Southwest Gas Corporation	90	0.8%	25	1.0%
United Energy Trading LLC dba Collective Energy	88	0.8%	36	1.4%
Liberty Utilities (CalPeco Electric) LLC	42	0.4%	16	0.6%

Figure 3 below shows is the relative impact each of the Top-10 energy utilities had on CAB’s energy workload by volume of contacts. The chart was created by using the variables of “utility name”, “case type” and “case count. Each of the Top-10 utilities is represented by a unique color, which is replicated throughout this report, and the size of the bubbles are relative to the case counts for each utility and case type.

In 2022 CAB’s energy consumer contacts were dominated by complaints about Southern California Edison and Pacific Gas and Electric respectively. Most of CAB’s energy staff resources were allocated to these two companies. The various case types represent different contact resolution processes with phone contacts being the least time intensive and Informal Complaints being the most.

³ Please refer to CAB’s Q1, Q2, and Q3 quarterly reports for a history and analysis of SCE’s billing issues and related consumer contacts. [Consumer Affairs Branch \(ca.gov\)](https://www.cpuc.ca.gov/consumer-affairs-branch)

**CAB Work Distribution by Case Type and Utility
Calendar Year 2022**

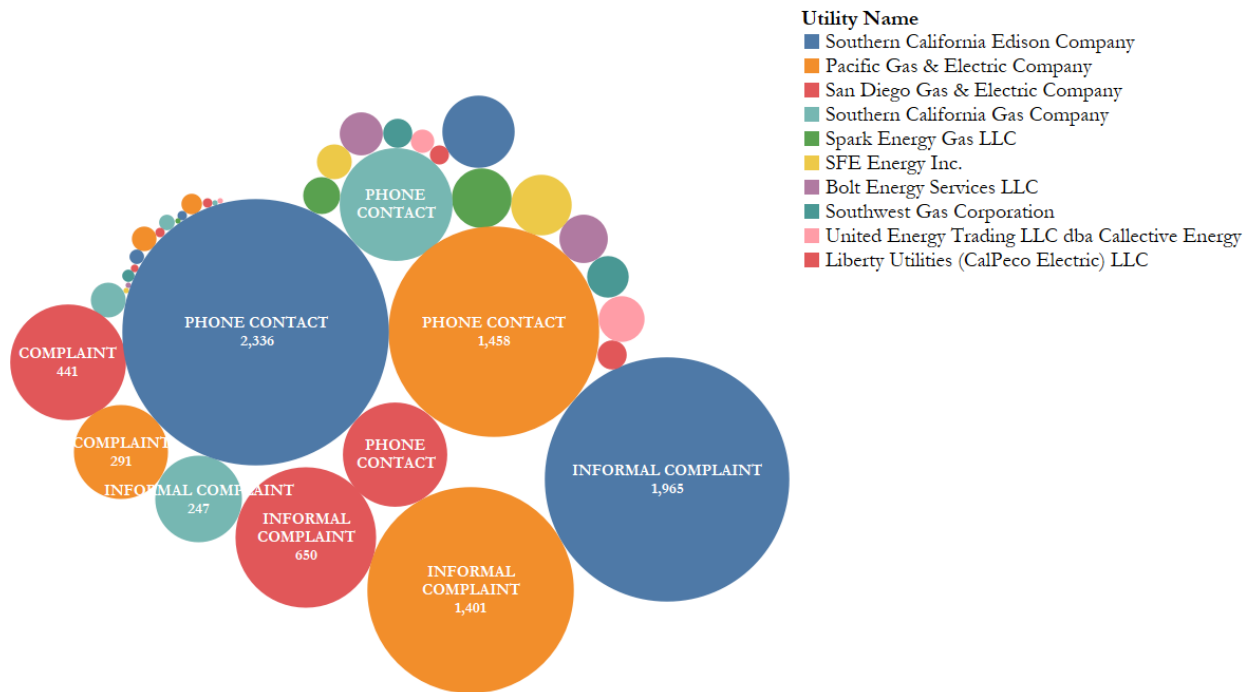


Figure 3: CAB Work Distribution by Case Type and Utility – Calendar Year 2022

Table 5 below shows the ranking of the Top-10 Energy Utilities by the average utility response interval. When CAB sends an informal complaint to a utility, the expectation is the utility will respond to CAB within **30 calendar days** to resolve the complaint.

Both Southwest Gas Corporation and SCE had average utility response intervals well over the **30-day** expectation but for different reasons. SCE’s long utility response interval (**58 calendar days**) may be attributed to the high volume of Informal Complaints it received from CAB during 2022, and the complexity of the billing issues involved. In contrast, PG&E, a similarly sized company, responded to **600** fewer Informal Complaints with an average response interval of only **15 calendar days**.

Southwest Gas Corporation’s average utility response interval is **50 calendar days**. CAB sent a total of **28** informal complaints to Southwest Gas during 2022 and received **27** utility responses. Obviously, complaint volume is probably not the cause of the delays in responding to CAB’s Informal Complaints. A review of the IC’s sent during 2022, shows most of the ICs were related to non-complex billing concerns, including high bill, other charges, payment arrangements, CARE recertification and disconnections for non-payment. CAB has not heard anecdotally of any reasons why Southwest Gas Corporation is taking as long as it is to respond to Informal Complaints.

Table 5: Top-10 Energy Utilities Average Utility Response Intervals

Utility Name	2022		Q4	
	Count Utility Responses	Avg Interval in Calendar Days	Q4 Count Utility Responses	Q4 Avg Interval in Calendar Days
Southwest Gas Corporation	27	50	8	72
Southern California Edison Company	1,979	58	504	59
San Diego Gas & Electric Company	680	23	108	11
SFE Energy Inc.	42	28	9	30
Southern California Gas Company	247	25	33	24
Liberty Utilities (CalPeco Electric) LLC	11	20	2	19
Spark Energy Gas LLC	43	22	20	27
United Energy Trading LLC dba Collective Energy	15	10	4	16
Pacific Gas & Electric Company	1,376	11	305	15
Bolt Energy Services LLC	61	6	3	20

Top-10 Subcategories for Top-10 Energy Companies for Calendar Year 2022 and Q4 2022

Typically, when CAB reports complaint data by subcategory, we count cases and group them by “primary subcategory”. The primary subcategory is the first subcategory attributed to the complaint, and it represents the overarching reason the consumer contacted CAB. However, the CIMS database allows multiple subcategories to a case (attributes), which allow for a better description of the case and subsequent in-depth analysis.

The two charts below use subcategory frequency as the measure. Subcategory frequency represents the count of the number of times an individual subcategory was selected over a specific period. The stacked bar chart uses color to identify the company, and the top ten most selected subcategories are listed.

Figure 4 below shows the subcategory selection for calendar year 2022. Most contacts received are related to billing issues with high bills being the top complaint. The second most frequently chosen subcategory is NJ-Customer Service. While this subcategory is not under the jurisdiction of CAB, the fact that it is the second most frequently chosen subcategory speaks to consumer dissatisfaction with the customer service provided by their utility companies. San Diego Gas and Electric’s relatively high subcategory frequency resulted from a spike of rate protest complaints early in 2022, which is illustrated in this chart.

Subcategory Frequency for Top 10 Utilities
Calendar Year 2022

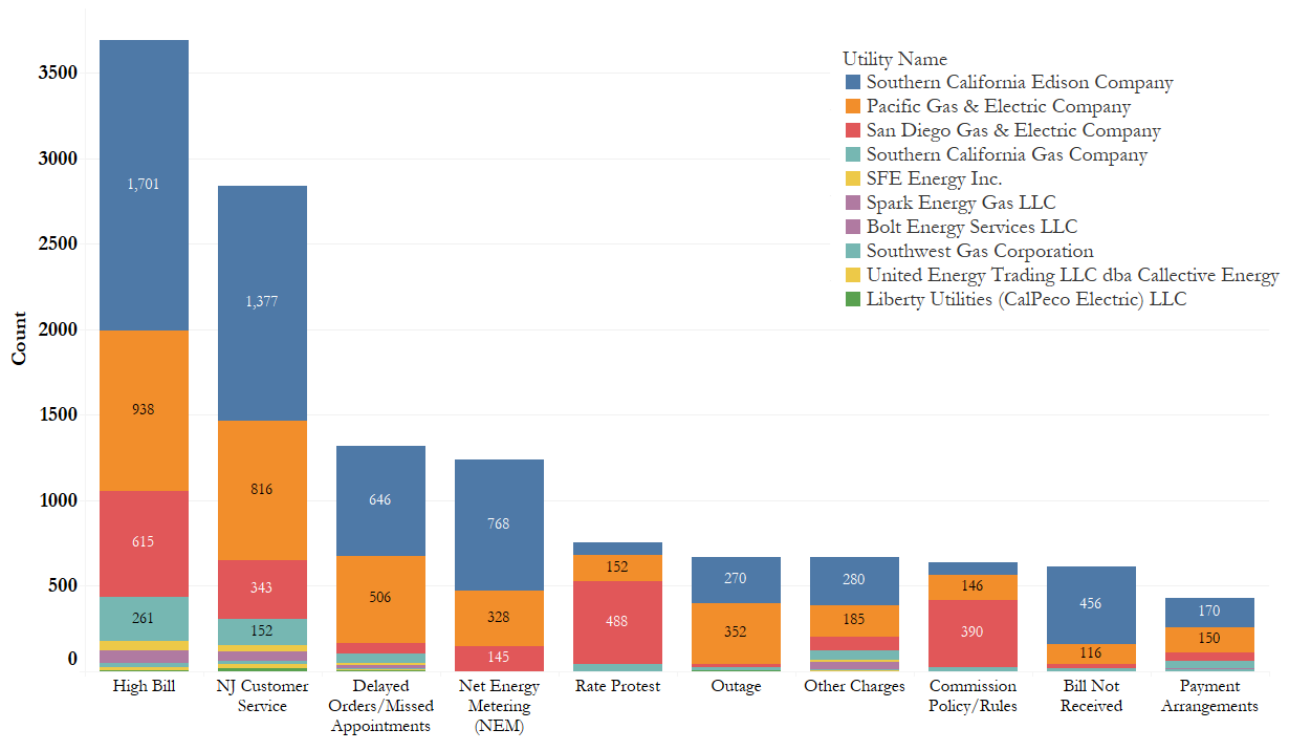


Figure 4: Subcategory Frequency for Top-10 Utilities 2022

Figure 5 below shows the subcategory frequency distribution for the fourth quarter 2022. High bill remained the dominant subcategory, but in the fourth quarter, NJ Customer service moved from the second most chosen subcategory to seventh position. Delayed Orders/Missed Appointments became the number two subcategory with Pacific Gas & Electric Co. having the most complaints related to that subcategory. A brief analysis of PG&E’s Delayed Order complaints points to an interesting indicator.

One in four Delayed Order complaints were related to residential customers and building contractors complaining about delays in permitting, application processing, and inspections related to consumers who are upgrading their electric by installing new electrical panels in their homes. Delays in replacing inadequate transformers and wiring to homes to support the upgrades are also occurring. PG&E’s Net Energy Metering customers are also experiencing delays in obtaining Permission to Operate and account for **seventeen percent** of the Delayed Order complaints. Tree trimming and removal issues, and power pole replacement delays are also some of the top reasons for PGE’s Delayed Order complaints.

**Subcategory Frequency for Top 10 Utilities
Q4 2022**

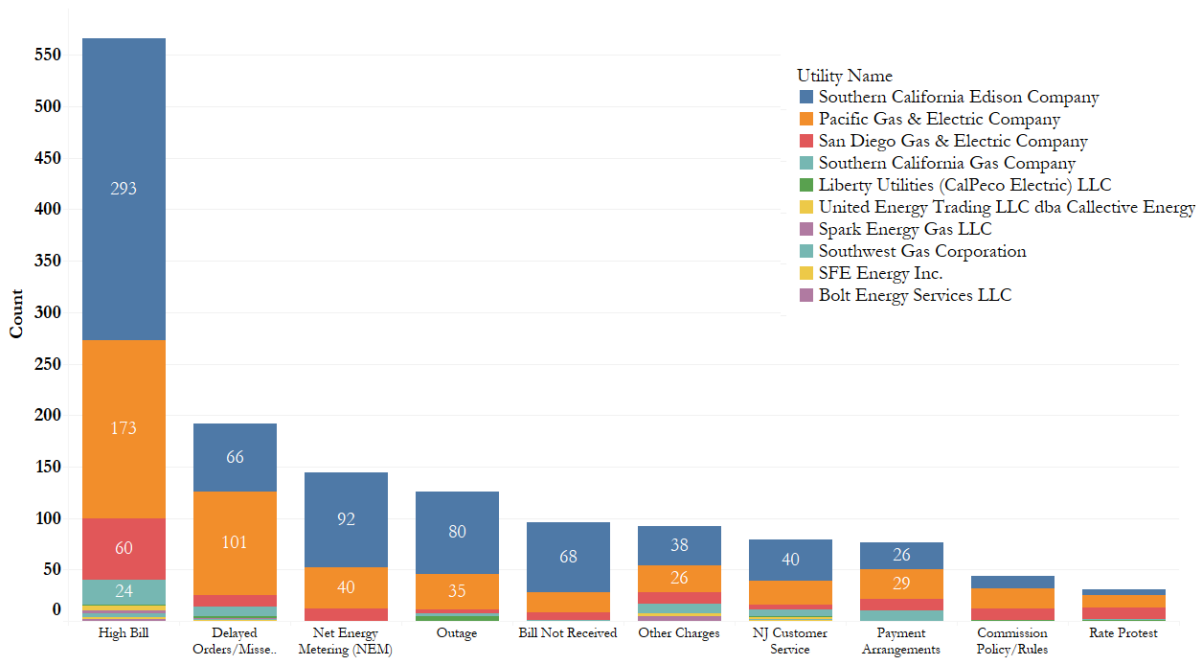


Figure 5: Subcategory Frequency for Top-10 Utilities Q4 2022

Considering SCE averaged slightly over **1,100 contacts** per quarter in 2022, the fourth quarter being no exception, the data shows SCE accounted for the largest number of subcategory choices for many of the top ten subcategories including: High Bill, Net Energy Metering, Outages, Bill Not Received, Other Charges, and NJ Customer Service. The fourth quarter data for SCE is consistent with the previous three quarters. SCE experienced a surge in complaints that began in Spring 2021 when it changed its billing system. Complaints peaked in the 3rd quarter of 2021 and began to decline, but SCE’s complaints have not yet returned to pre-cutover levels⁴.

TELECOMMUNICATIONS UTILITIES 2022 RECAP WITH Q4 HIGHLIGHTS

CAB received **9,024** contacts related to telecommunication utilities in 2022. The Top-10 telecommunication utilities that received the most contacts accounted for **80 percent** of the total telecommunication contacts. AT&T California received the most complaints in 2022, accounting for **25 percent** of the total number of complaints received against telecommunication companies. **Table 6** shows the total number and percent of complaints the Top-10 telecommunication utilities received in 2022 and the fourth quarter.

⁴ Ibid

Table 6: Top-10 Telecommunication Utility Contact Statistics

Contacts and Top-10 Utilities	2022		Q4 2022	
Total for Telco Contacts	9,024	100%	2,514	100%
Total for Top-10 Telco Contacts	7,192	80%	2,054	82%
Top-10 Utilities				
AT&T California	2,271	25%	606	24%
Frontier California Inc.	875	10%	220	9%
Lifeline Administrator	752	8%	368	15%
Cellco Partnership	740	8%	181	7%
Charter Fiberlink CA-CCO, LLC	632	7%	172	7%
AT&T Mobility Wireless Operations Holdings Inc.	466	5%	91	4%
TracFone Wireless, Inc.	461	5%	124	5%
T-Mobile West LLC	436	5%	105	4%
Comcast Phone of California, LLC	291	3%	108	4%
Assurance Wireless USA, L.P.	268	3%	79	3%

AT&T California also received the most complaints in the fourth quarter, accounting for **24 percent** of the contacts received for the entire quarter. **Figure 6** shows the number of complaints the Top-10 telecommunication utilities received by quarter. (Note - quantities below 199 are not shown in the chart.)

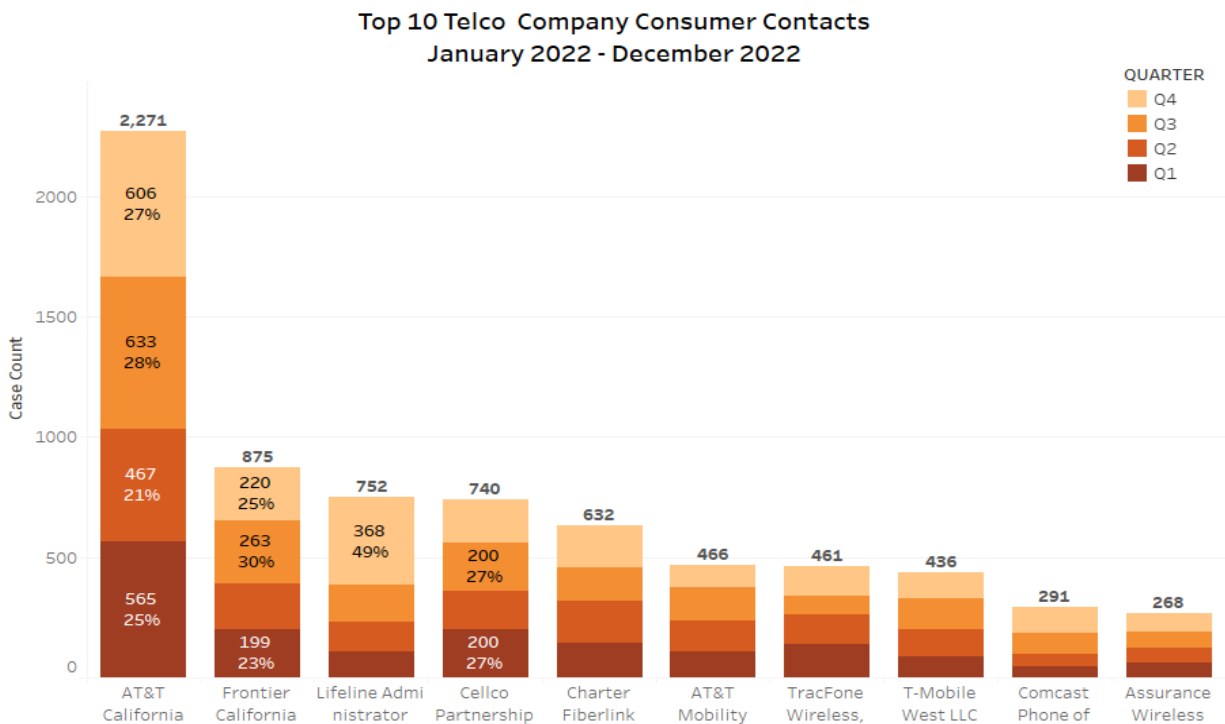


Figure 6: Top-10 Telco Company Consumer Contacts for 2022

As shown in **Figure 7**, LifeLine related contacts increased in the fourth quarter driving an upward trend in overall telecommunication complaints, offsetting Billing, Service, and Not Regulated – No Jurisdiction complaints, which decreased in the fourth quarter. For additional details and breakdown of LifeLine activity see the LifeLine section below.

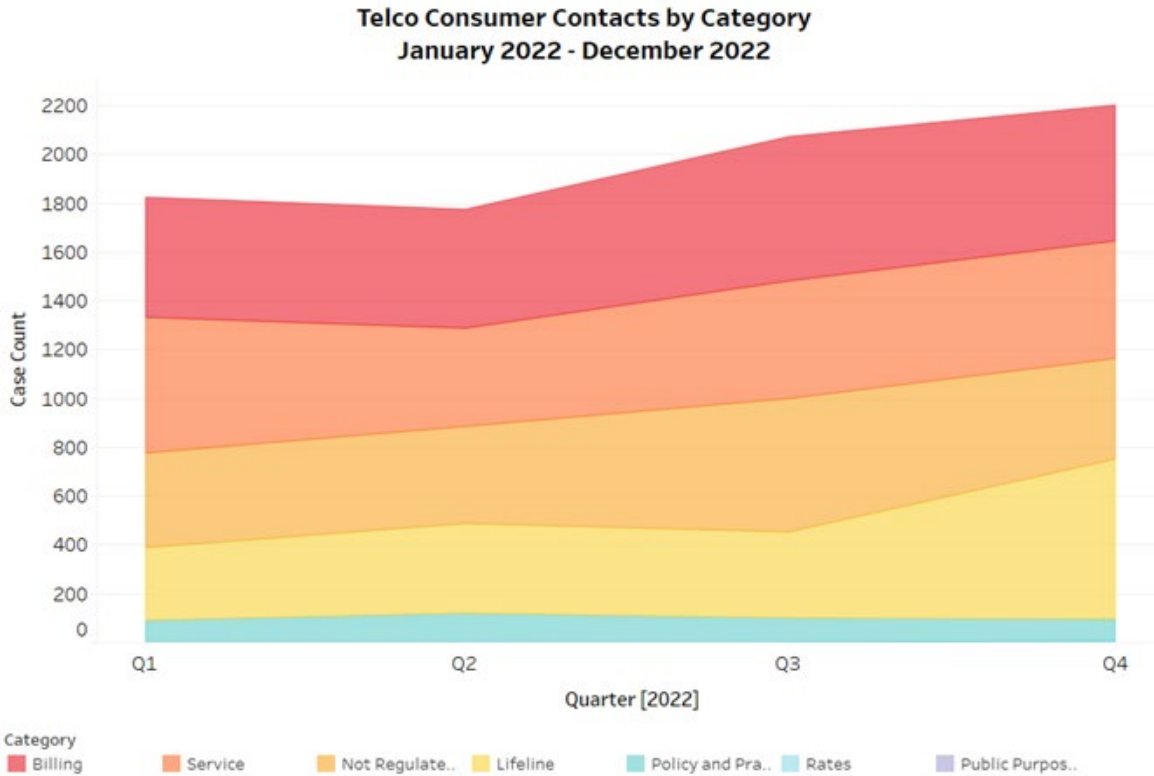


Figure 7: Telecommunication Consumer Contacts by Category

For 2022, the Top-10 most frequent consumers’ complaints regarded Outages, High Bill, and Other Charges⁵, see **Figure 8**. Consumers complain most frequently about Outages, and while AT&T California accounts for **25 percent** of the total Telecommunications contacts CAB received, **50 percent** of those complaints are regarding outages with AT&T California. AT&T California also has the most complaints in the Other Charges and High Bills, which are the second and third highest subcategories for 2022. Although Cellco Partnership only comprises of **8 percent** of the total Telecommunications contacts CAB received for the entire year, most of their consumers are complaining about Other Charges and High Bill.

⁵ Other Charges complaints can include topics such as (but not limited to) roaming, 411, returned check charges, transfer charges, activation fee, closed account charges (i.e., consumer terminated service with utility and is still receiving bills even though account balance was \$0 at termination).

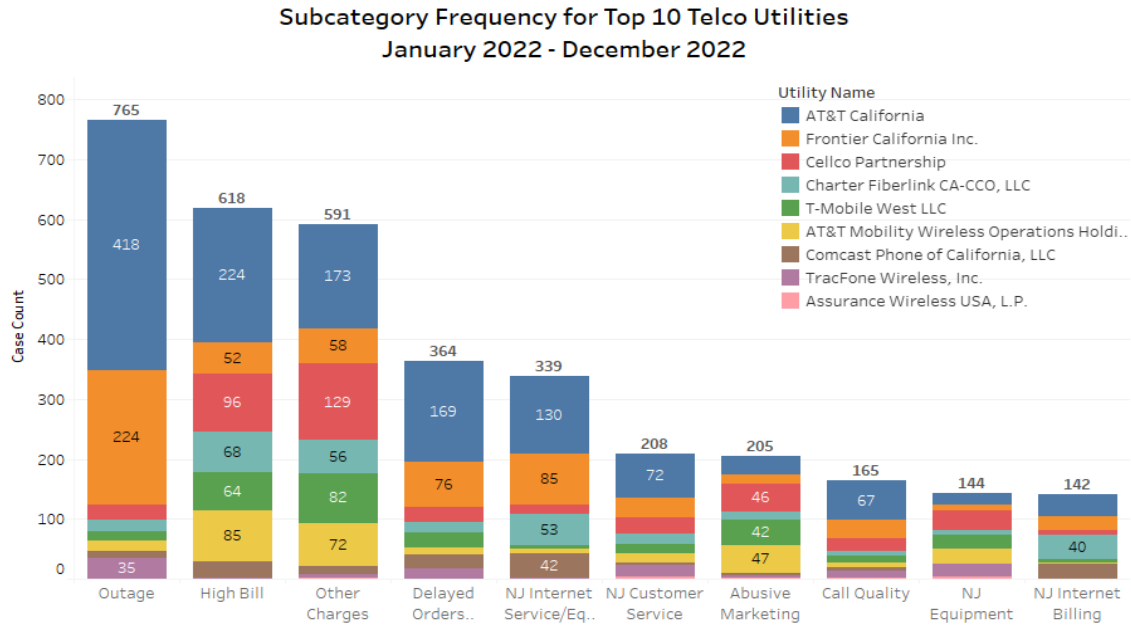


Figure 8: Subcategory Frequency for Top-10 Telco Utilities for 2022

As shown in **Figure 9**, the fourth quarter Outages continue to be the highest subcategory, followed closely by Other Charges and High Bill. Although AT&T California and Fronter California, Inc. are the top utilities that received the most complaints, the number of complaints for these utilities decreased in the fourth quarter. In addition, Cellco Partnership and T-Mobile West make up significant share of the Other Charges and High Bill complaints compared to AT&T California and Frontier California.

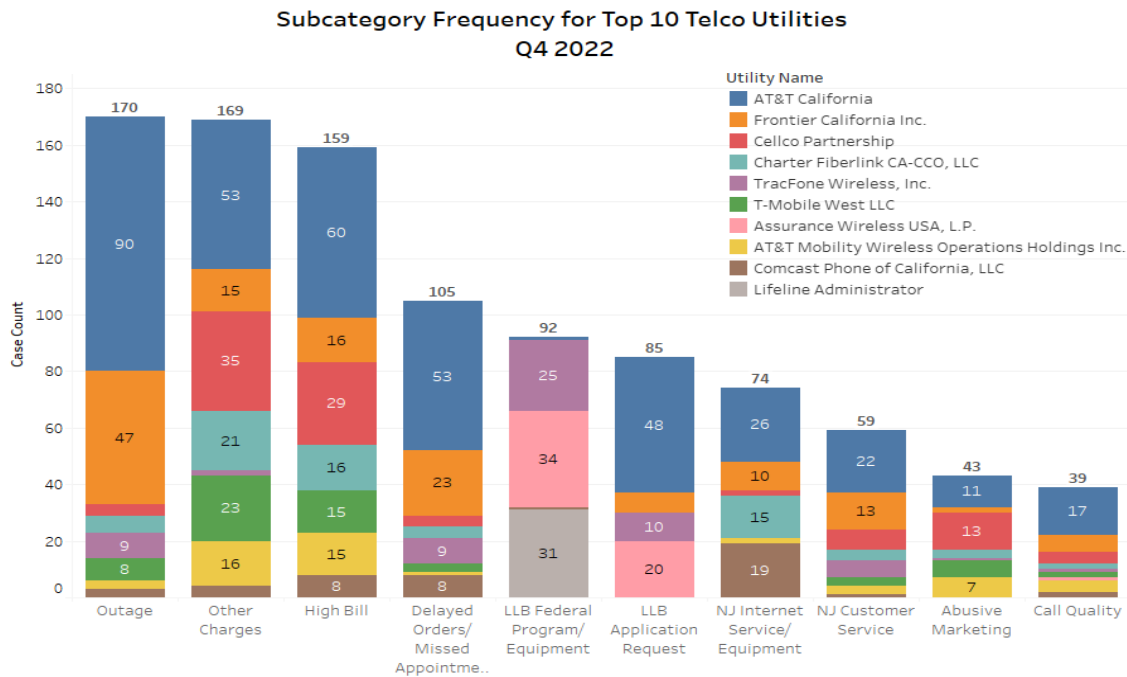


Figure 9: Subcategory Frequency for Top-10 Telco Utilities for Q4 2022

LIFELINE

CAB has five dedicated California LifeLine specialists to assist consumers in answering inquiries and questions related to the LifeLine program. CAB also reviews appeals filed by consumers who were disqualified by the program’s Third-Party Administrator (TPA). Additionally, CAB facilitates LifeLine billing issues to service providers for investigation and resolution as necessary.

In the fourth quarter of 2022, CAB received **649** LifeLine consumer contacts, a **79 percent** increase from the prior quarter, see **Table 7**. Many of the fourth quarter’s contacts were regarding consumers’ recertification applications, which resumed as of July 1, 2022, after a two-and-a-half-year hiatus during the pandemic. LifeLine customers are allowed a **106-day** period to return certification forms for renewals so that the July recertification forms mailed to California LifeLine consumers expired in early November 2022. Consumers get two attempts within the **106-day** period to complete and return certification forms. Any incorrectly completed forms are denied, and consumers must reapply after the anniversary date has passed. Consumers whose renewal anniversary date ended in November 2022 who did not recertify or were denied would have received a higher bill in December, thus causing an upsurge in LifeLine contacts for December, and inflating the number of LifeLine contacts in the fourth quarter. Fourth quarter LifeLine Appeals increased **139 percent** due to consumers contacting CAB regarding the denial of their recertifications.

Table 7: LifeLine Contacts Received and Closed for 2022

	Q1	Q2	Q3	Q4	Q3 to Q4 % Change
LifeLine Contacts Received					
Phone Contacts Received	136	157	144	190	32%
Written Contacts Received	139	214	218	459	111%
Total Contacts Received	275	371	362	649	79%
Top LifeLine Case Types Closed					
LifeLine Appeals	110	118	138	330	139%
LifeLine Billing Cases	191	225	249	279	12%

The significant increases from third quarter to fourth quarter in LifeLine subcategories “LL Consumer Did Not Return Form,” “LL IDV Identity Verification,” and “LL Form Complexity” indicate that LifeLine consumers did not complete or timely submit their recertification forms to continue their participation in the California LifeLine program and appealed their result of being denied, see **Figure 10**. Additionally, the increases in the “LLB Application Request” subcategory may indicate that consumers were requesting applications because their recertification was denied and need to reenroll in the program.

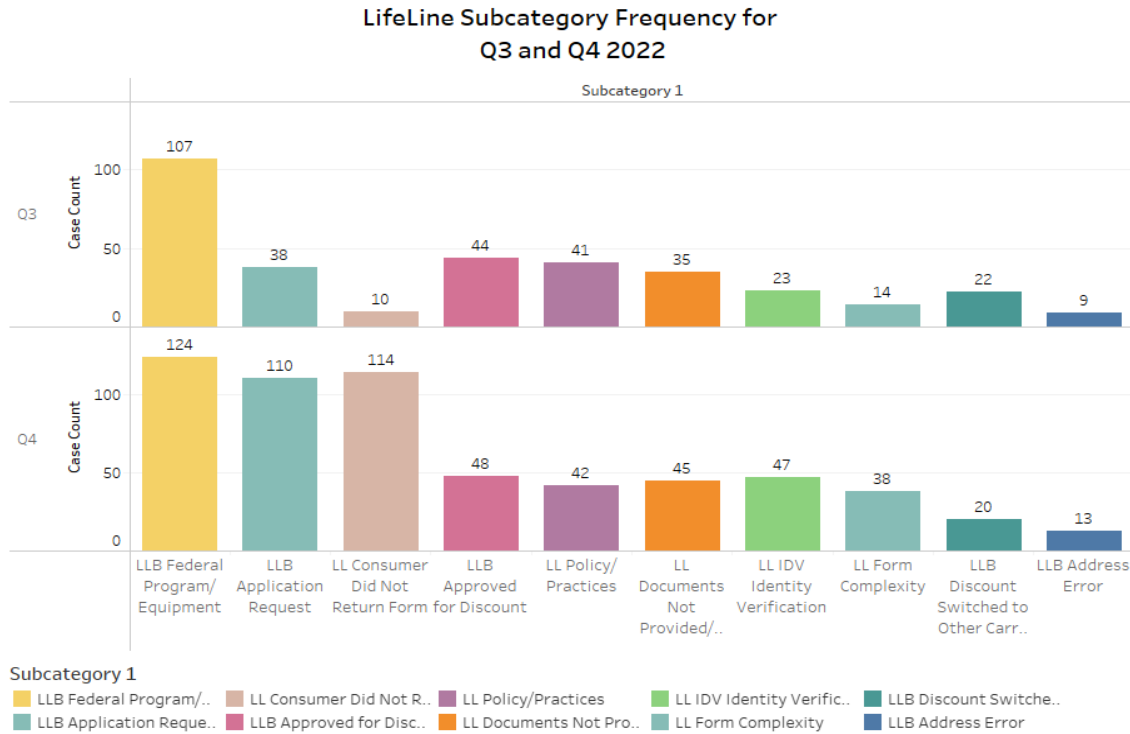


Figure 10: LifeLine Subcategory Frequency Comparison between Q3 and Q4 for 2022

During the fourth quarter of 2022, the CPUC announced that contracted was awarded to Maximus, who will continue their role as the TPA for the California LifeLine program.

TEAM AND CHANGES

In addition to the customer contacts handled by CAB, the Telecommunications Education and Assistance in Multiple-Languages (**TEAM**) and Community Help and Awareness of Natural Gas and Electric Services (**CHANGES**) programs overseen by CAB assist Limited English Proficient (LEP) consumers with telecommunications and energy issues, respectively.

The most recent TEAM and CHANGES contract was awarded to the non-profit organization Self-Help for the Elderly (SHE) from June 7, 2019, to June 6, 2022, with two one-year options to extend the contract. The CPUC is currently in the first option year, which is due to expire on June 6, 2023. If a second option year is approved, the contract will end on June 6, 2024. TEAM is authorized for an annual budget up to **\$1.6 million**, and CHANGES is authorized up to **\$1.68 million** per year.

TEAM and CHANGES support LEP utility consumers statewide through **26** CBOs that offer services in their preferred language, and with cultural sensitivity. The CBOs provide consumer outreach, education, and case assistance (needs assistance and dispute resolution).

In the fourth quarter of 2022, CBOs provided case assistance to **2,196 consumers**, for financial and other needs (e.g., CARE/LifeLine or other financial assistance programs), or with utility disputes. This was a

decrease of **11 percent** from the previous quarter, as shown in **Table 8**. CBOs also provide education on a range of topics to assist them in managing their utility services. In the fourth quarter, these education classes had an attendance of **13,282**, which was a decrease of **22 percent** compared to the previous quarter.

Finally, the TEAM program helped consumers resolve disputes with their telecommunications provider that resulted in reclaiming almost **\$24,000** on their behalf in the fourth quarter. Over the last four quarters, CBOs reclaimed approximately **\$116,000** from telecommunications providers on behalf of their TEAM clients.

Table 8: CBO Case Support and Education Services Provided and Amount Recovered

2022					
	Q1	Q2	Q3	Q4	Total
Individual Case Support	2,769	2,472	2,457	2,196	9,894
Education Provided*	16,901	18,375	17,043	13,282	65,601
Amount Recovered (TEAM)	\$38,770	\$33,023	\$19,995	\$23,813	\$115,601

* The data in this row has been changed to reflect that the basis of the data reported has been changed to show total classroom attendance