



Consumer Affairs Branch

THIRD QUARTER REPORT-2023

October 30, 2023



**California Public
Utilities Commission**

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ABOUT THIS REPORT

This quarterly report highlights consumer issues related to telecommunications, 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 July through September 2023.

THIS REPORT DETAILS Q3-2023 HIGHLIGHTS:

- [CAB Returned More Than \\$799,719 to Consumers in the Q2-2023](#)
- [CAB Received 7,626 Consumer Contacts](#)
- [CAB Assisted About 2,141 Consumers Resolve Complaints](#)

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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 telecommunications, 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 contact data to assist CPUC decision-makers, supports enforcement against fraud and abuse and informs the public.

CONSUMER REFUNDS – CAB RETURNED \$799,719 TO CONSUMERS

During Q3-2023, consumers were reimbursed **\$799,719** 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 California Public Utilities Commission (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 Q3 by industry: Telecommunications **\$534**, Energy **\$2,579** Water **\$1,380**.

Table 1: Consumer Refunds by Industry² and Quarter

Industry	2022	2023		
	Q4	Q1	Q2	Q3
Energy	\$431,915	\$575,080	\$400,065	\$639,504
Telecommunications	\$99,029	\$94,673	\$146,110	\$142,225
Transportation				\$50
Water	\$19,435	\$18,408	\$22,037	\$17,940
Total	\$550,379	\$688,161	\$568,212	\$799,719

THIRD QUARTER REFUND HIGHLIGHTS

- Frontier California Outage/Billing issue:** During a storm, the customer lost phone service in November 2021. Service was not restored until nineteen months after the initial service request was submitted. The customer turned off the auto-payment in April 2023 and sent Frontier a letter to complain about the service outage and stated that they would not be making any more payments until service was restored. Finally, on June 16, 2023, Frontier sent out a service technician to restore service. However, Frontier suspended service for lack of payment and the customer couldn't verify that service was restored. The customer terminated service with Frontier on June 22, 2023, and sent a letter to Frontier disputing the charges for no service. Frontier responded that they were handing over the matter to a collection agency. In response to CAB’s Informal Complaint, Frontier issued a credit totaling **\$219.71** to the customer’s account and apologized to the customer for any inconvenience.
- Southern California Edison (SCE) Delayed Billing Issue:** The customer contacted CAB because he had not received a bill since July 2022, the customer did not receive a statement for over a year. The utility could not provide the customer with an estimated time as to when bills will be sent to the customer again. SCE researched the delay in generating the customer's monthly billing statements from June 22, 2022 - August 14, 2023. SCE applied Rule 17 and delivery charges for service dates from June 17, 2022, to April 16, 2023, totaling **\$1,746.51** were reversed.
- Suburban Water Systems Meter/Leak/Billing issue:** The customer received a high water bill in the amount of \$805.12. Suburban stated that the high charges for those months were due to a faulty meter. Suburban originally advised the customer that the high bill was due to a leak. The customer hired a plumber who found no leaks in the entire water system. The customer believes that the large leak found at the metering valve had initially damaged the meter. After Suburban replaced the valve, it gave normal readings. On August 24, 2022, customer service called the customer and notified the customer that a courtesy adjustment was being

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 Q1 in this report.

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

made in the amount of \$256.86. Subsequently, Suburban Water Systems has applied an additional credit adjustment to the customer’s account in the amount of \$489.91, for a total credit of \$746.77.

CAB RECEIVED 7,626 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 Q3-2023, CAB received **7,626 contacts**³ (see **Figure 1** below). **Table 2** below shows that Energy accounted for approximately **58 percent** of the total industry contacts during Q3. **30 percent** of the contacts were related to Telecommunications, and the remaining **13 percent** of the contacts were distributed among Water, Transportation, and Non-Regulated utilities.

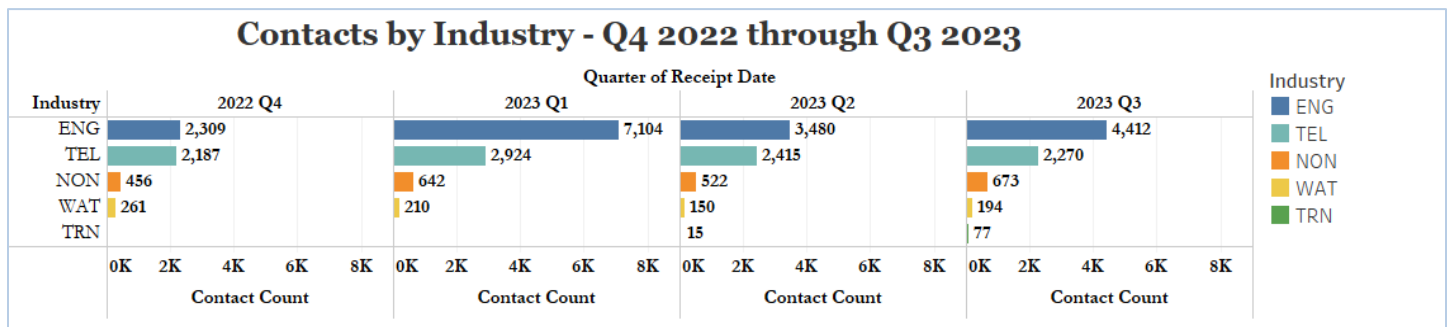


Figure 1: Consumer Contacts by Industry and Quarter

During Q3-2023, Billing issues accounted for **41 percent** of consumer contacts across all industries. The second and third most common category of issues were Not Regulated – No Jurisdiction, at **21 percent** and Service also at **18 percent** (see **Table 2** below).

Table 2: Consumer Contacts by Category and Industry – Q3 2023

Category	Energy	Non Jurisdictional	Telecommunications	Transportation	Water	Total	% of Total (All contacts)
Billing	2431	22	582	4	112	3151	41%
Not Regulated - No Jurisdiction	454	629	480	9	20	1592	21%
Service	933	9	395		34	1371	18%
Lifeline			715	1		716	9%
Policy and Practices	249	5	98	3	14	369	5%
Public Purpose Programs	244	7				251	3%
Rates	101				14	115	2%
Transportation		1		60		61	1%
Total	4412	673	2270	77	194	7626	100%
% of Total (All industries)	58%	9%	30%	1%	3%		

³ For the purposes of this report “Total Contacts” is calculated as all contacts received during the time period. Contacts where either the industry is not identified and/or the contacts is identified as “Misdirected”. Misdirected means that the consumer contacted the CPUC by mistake.

CAB began receiving Transportation consumer contacts in June 2023. CAB will continue to report on the Transportation contacts it receives in future quarterly reports. CAB’s role is to accept all consumer contacts related to Transportation, perform triage to determine which contacts can be resolved by CAB and which contacts need to be referred to Transportation Enforcement.

CAB ASSISTED 2,141 CONSUMERS RESOLVE INFORMAL COMPLAINTS

CAB’s Informal Complaints (ICs) are written complaints⁴ about issues under the CPUC’s jurisdiction, and CAB has the authority to act as an intermediary between the consumer and the regulated utility to resolve the consumer’s issues. The IC process allows consumers an easily accessible way to resolve disputes with their utility. During Q3-2023, CAB resolved **2,141** ICs, see **Figure 2** below. Of the ICs closed in Q3, **64 percent** were for Energy ICs, **33 percent** were for Telecommunications ICs, and the remaining **3 percent** were attributed to Water ICs.

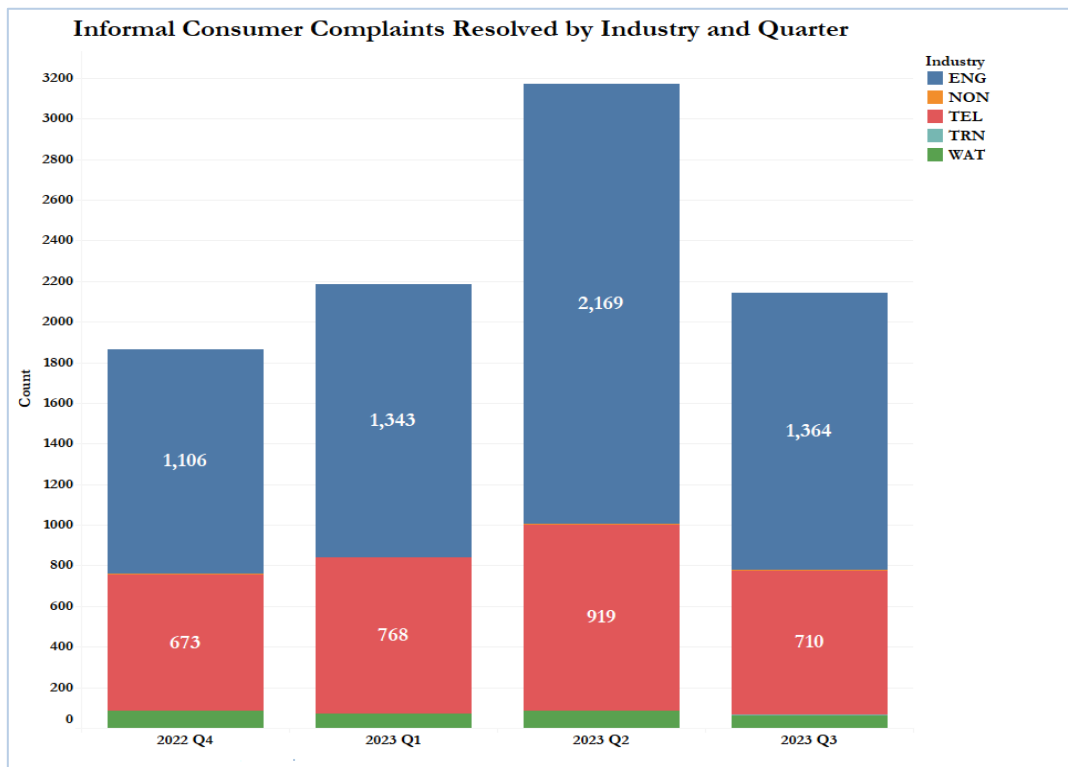


Figure 2: Informal Consumer Complaints Resolved by Industry and Quarter

When Informal Complaints are closed, they are assigned a case disposition. The disposition summarizes the results of the case. Cases are resolved *In Consumer Favor*, when it is determined that the utility made an error, or failed to comply with commission orders, tariffs, and decisions. Cases are resolved *In Favor of Utility* when, after review of the facts of the case, CAB finds that the utility did not make an error and complied with commission orders etc. The disposition, *Discretion Utility*, usually occurs when it is determined that while the utility was not out of compliance, the utility, for example, issues a courtesy bill adjustment. When the

⁴ Written complaints means that CAB received the consumer’s complaint from a written source such as letter, email, web, and faxed.

disposition, *Compromise*, is identified, the disposition indicates that both parties in the dispute had valid arguments, and both the utility and the consumer came to an amicable agreement.

Table 3 below shows the distribution of the above-described dispositions for the Energy, Telecommunications, and Water utilities. The table shows during Q3, Energy ICs were decided in favor of the utility **59 percent** of the time while Telecommunications ICs were decided in favor of consumers **52 percent** of the time. Water utility related ICs were resolved in favor of the utilities **57 percent** of the time.

Table 3: Informal Consumer Complaints Resolved by Industry and Disposition

Disposition	2022 Q4		2023 Q1		2023 Q2		2023 Q3	
IN FAVOR OF UTILITY	608	56%	801	60%	1352	63%	792	59%
IN CONSUMER FAVOR	463	42%	474	36%	729	34%	516	38%
DISCRETION UTILITY	5	0%	43	3%	32	1%	30	2%
COMPROMISE	18	2%	14	1%	42	2%	13	1%
Total	1094	100%	1332	100%	2155	100%	1351	100%
IN FAVOR OF UTILITY	237	36%	268	36%	295	33%	289	42%
IN CONSUMER FAVOR	369	57%	441	59%	550	61%	360	52%
DISCRETION UTILITY	34	5%	31	4%	36	4%	37	5%
COMPROMISE	13	2%	8	1%	20	2%	4	1%
Total	653	100%	748	100%	901	100%	690	100%
IN CONSUMER FAVOR							1	100%
Total							1	100%
IN FAVOR OF UTILITY	43	52%	38	53%	47	57%	36	57%
IN CONSUMER FAVOR	38	46%	33	46%	32	39%	24	38%
DISCRETION UTILITY	0	0%	0	0%	1	1%	3	5%
COMPROMISE	1	1%	1	1%	3	4%	0	0%
Total	82	100%	72	100%	83	100%	63	100%

ENERGY UTILITIES RECAP WITH Q3-2023 HIGHLIGHTS

This report reviews consumer contacts CAB received in Q3-2023 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 compared to all other energy companies regulated by the CPUC.

ENERGY CONSUMER CONTACTS Q3-2023

CAB received a total of **4,416** contacts related to energy utility companies in Q3-2023. The Top-10 energy utilities accounted for **97 percent** of total energy contacts. Most of the contacts were from Southern California Edison (SCE) customers and Pacific Gas and Electric (PG&E) customers, accounting for **53 percent** and **32 percent** of contacts respectively. Most of the contacts were related to high bills, customer service issues, net energy metering (NEM), delayed orders and payment arrangements disconnections for nonpayment.

Table 4 shows the breakout of Top-10 Energy Utilities by count and percentage of the total.

Table 4: Top-10 Energy Utility Contact Statistics

Contacts and Top-10 Utilities		Q3 2023	
Total Energy Contacts		4416	100%
Total Top-10 Utility Energy Contacts		4290	97%
	Top-10 Utility Name		
	Southern California Edison Company	2326	53%
	Pacific Gas & Electric Company	1423	32%
	San Diego Gas & Electric Company	172	4%
	Southern California Gas Company	161	4%
	SFE Energy Inc.	72	2%
	Spark Energy Gas LLC	35	1%
	AAA Natural Gas	29	1%
	Vista Energy Marketing L.P.	29	1%
	Southwest Gas Corporation	22	0%
	Liberty Utilities (CalPeco Electric) LLC	21	0%

Figure 3 below shows the relative impact that 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 - 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 Q3-2023, CAB’s energy consumer contacts were dominated by SCE, PG&E and San Diego Gas & Electric consumers respectively. Most of CAB’s staff resources were allocated to these three companies. The various case types represent different contact resolution processes, with Phone Contacts being the least time intensive, and ICs and Complaints⁵ being the most intensive.

⁵ A consumer contact expressing dissatisfaction with or protesting an action or practice of the CPUC, or a regulated or non-regulated utility. The dispute may not be within the purview of the Consumer Affairs Branch to investigate, and the issue is best handled by another CPUC branch. The allegation is NOT sent to the utility for investigation and response, but handled as a referral to the appropriate utility, CPUC division, or closed outright with the appropriate letter of explanation.

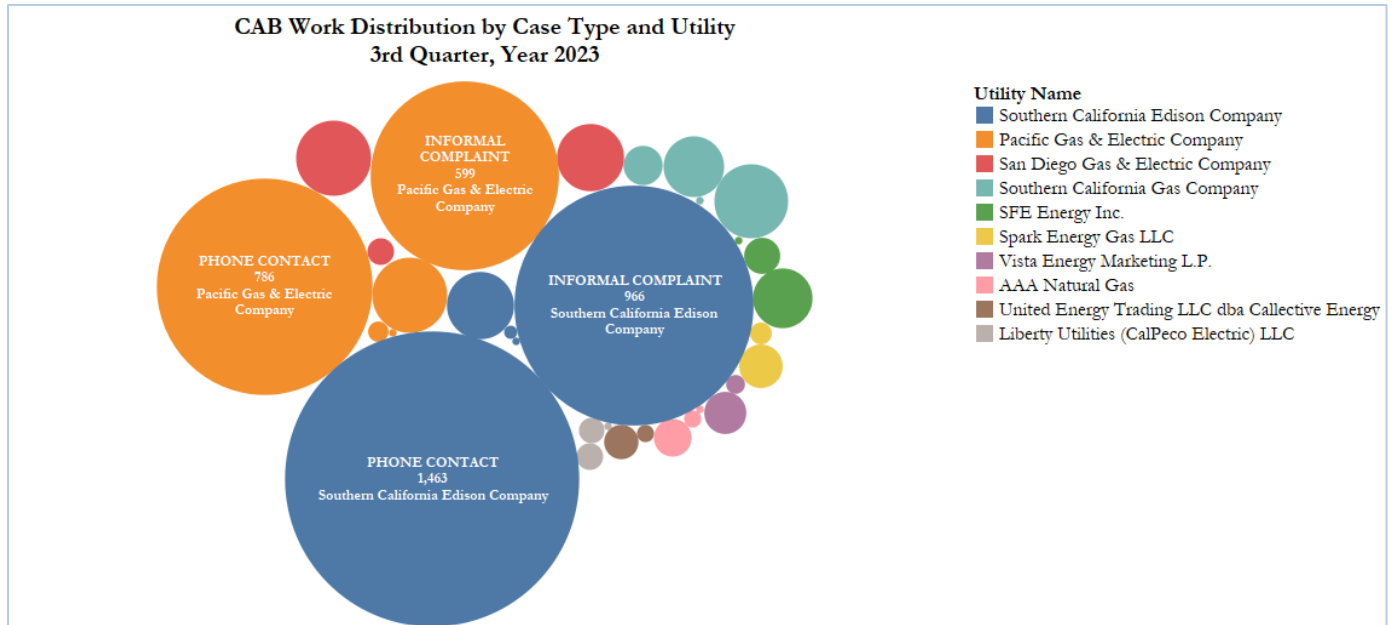


Figure 3: CAB Work Distribution by Case Type and Utility – Q3-2023

Table 5 below shows the ranking of the Top-10 Energy Utilities for Q3-2023, by the number of informal complaints submitted and the average utility response interval. When CAB sends an IC to a utility, the expectation is that the utility will respond to CAB within **20 business days** to resolve the IC. SCE had the largest average utility response interval, well over the **20-day** standard. SCE’s long utility response interval of **58 calendar days** may be due to the complex nature of billing complaints. SCE also continues to work on reducing complaint backlogs stemming from problems associated with transitioning to a new billing platform back in 2021. In contrast, PG&E, a similarly sized company responded to **580** ICs with an average response interval of only **12 calendar days**.

Table 5: Top-10 Energy Utilities by Case Responses - Average Utility Response Intervals Q3-2023

Utility	Q3 Utility Responses Recieved	Q3 2023 Average Response Interval
Southern California Edison Company	597	58
Pacific Gas & Electric Company	580	12
San Diego Gas & Electric Company	122	21
Southern California Gas Company	68	26
SFE Energy Inc.	20	28
Liberty Utilities (CalPeco Electric) LLC	10	18
Spark Energy Gas LLC	9	24
Desert Community Energy	5	15
United Energy Trading LLC dba Collective Energy	5	5
Southwest Gas Corporation	5	55

TOP-10 SUBCATEGORIES FOR TOP-10 ENERGY COMPANIES FOR Q2-2023

Typically, when CAB reports case 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 allows for a better description of the case and subsequent in-depth analysis.

In **Figure 4**, subcategory frequency represents the count of the number of times an individual subcategory was selected in Q3-2023. High Bill was applied to **30 percent** of all contacts, followed by NJ Customer Service⁶ and Net Energy Metering (NEM) being applied to **25 percent** and **9 percent** respectively.

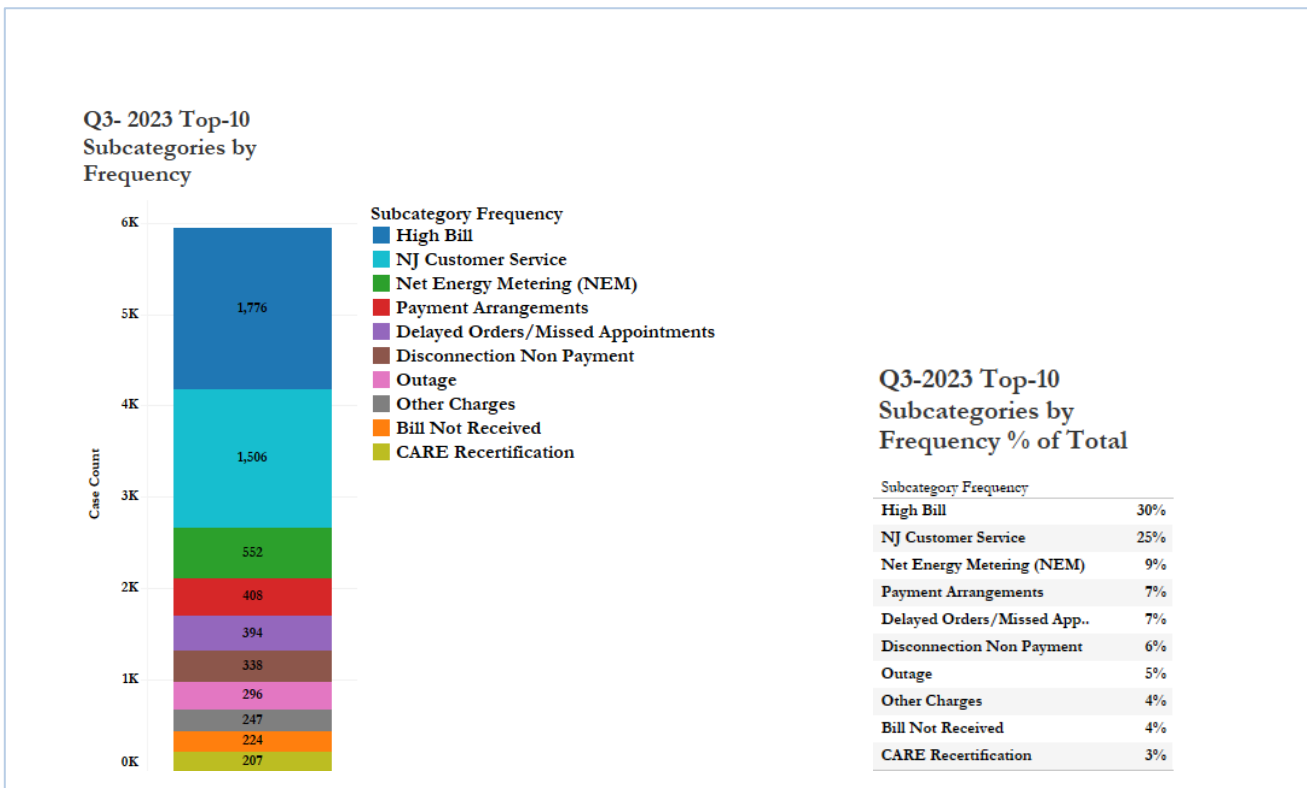


Figure 4: Top-10 Subcategory Frequencies for Energy Utilities Consumer Contacts

Table 6 and **Figure 5** below show the subcategory frequency distribution for the Top-10 energy utilities in the third quarter of 2023. A review of subcategory frequencies data reveals that SCE accounted for the largest number of subcategory choices for 7 out of the Top-10 subcategories including High Bill, NJ Customer Service, Net Energy Metering, Delayed Orders/Missed Appointments, Other Charges, Bill Not Received and CARE Recertification. SCE continues to struggle with delayed billing issues as they account for **80 percent** of the Bill Not Received Subcategory choice. CARE Recertification complaints were submitted predominantly by SCE customers at **87 percent**.

⁶ NJ Customer Service subcategory applies to customer service-related issues such as being transferred from one person to another multiple times within one phone call, not being able to reach the correct department or someone who could deal with the issue, and rude utility representatives.

PG&E dominated the Outage, Disconnection Non-Payment, and Payment Arrangements subcategories.

Table 6: Subcategory Frequency for Top-10 Energy Utilities - Percentage of Total

Subcategory	Southern California Edison Company	Pacific Gas & Electric Company	San Diego Gas & Electric Company	Southern California Gas	SFE Energy Inc.	Spark Energy Gas LLC	Liberty Utilities (CalPeco Electric)	Southwest Gas Corporation	Vista Energy Marketing L.P.	AAA Natural Gas
High Bill	62%	26%	4%	3%	2%	1%	0%	0%	1%	0%
NJ Customer Service	68%	21%	4%	3%	1%	1%	1%	0%	0%	0%
Net Energy Metering (NEM)	71%	24%	4%		0%					
Payment Arrangements	44%	51%	1%	3%			0%	0%		
Delayed Orders/Missed Appointments	49%	42%	3%	3%	0%	1%	1%	1%		1%
Disconnection Non Payment	22%	73%		2%	0%		0%	3%		
Outage	31%	63%	4%	1%			1%	0%		
Other Charges	53%	20%	8%	7%	5%	3%	1%	1%	1%	2%
Bill Not Received	80%	15%	3%	1%		0%				
CARE Recertification	87%	9%	2%	1%				0%		

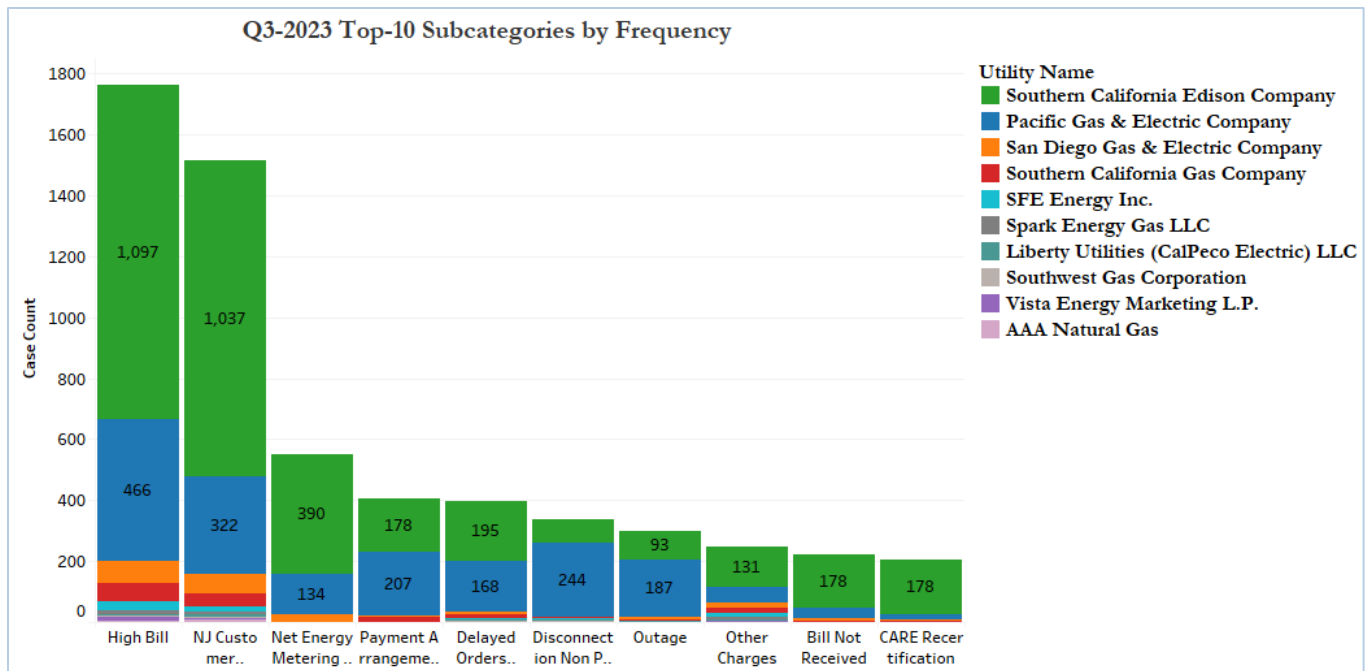


Figure 5: Top-10 Subcategory Frequencies for Top-10 Energy Utilities Consumer Contacts

TELECOMMUNICATIONS UTILITIES 12-MONTH RECAP WITH Q3-2023 HIGHLIGHTS

In Q3-2023, CAB handled a total of **1,560** contacts pertaining to telecommunication utilities, excluding LifeLine-related inquiries. Notably, the following 10 telecommunication utilities received the majority, encompassing **88 percent** of all telecommunication-related contacts for the quarter. AT&T California received the highest volume of contacts, constituting **30 percent** of the total queries directed at

telecommunication companies. For a detailed breakdown of the total number and percentage of contacts received by the top 10 telecommunication utilities in Q3-2023, please refer to **Table 7** below.

Table 7: Top-10 Telecommunication Utility Contact Statistics.

Contacts and Top-10 Utilities		Q3 2023	
Total for Telecommunication Contacts		1560	100%
Top-10 Utilities			
	AT&T California	461	30%
	Frontier California Inc.	197	13%
	Comcast Phone of California, LLC	153	10%
	T-Mobile West LLC	134	9%
	Verizon Wireless	121	7%
	Charter Fiberlink CA-CCO, LLC	105	7%
	AT&T Mobility Wireless Operations Holdings Inc.	86	6%
	Comcast OTR1, LLC	50	3%
	TracFone Wireless, In	36	2%
	Assurance Wireless USA	17	1%
Total for Top-10 Telecommunication Contacts		1360	88%

When analyzing the third-quarter data, a distinct shift becomes apparent when compared to the previous quarter. The initial surge in consumer contacts observed in January decreased through the second quarter, reaching its lowest point in the third quarter, particularly in the month of July. This indicates a notable adjustment in the volume of inquiries and issues raised by consumers. It's noteworthy that the Service category, experienced minimal fluctuations during the first and second quarters, as can be seen in **Figure 6**. Service category means that a consumer contacts the CPUC regarding the services provided to them by the utility.

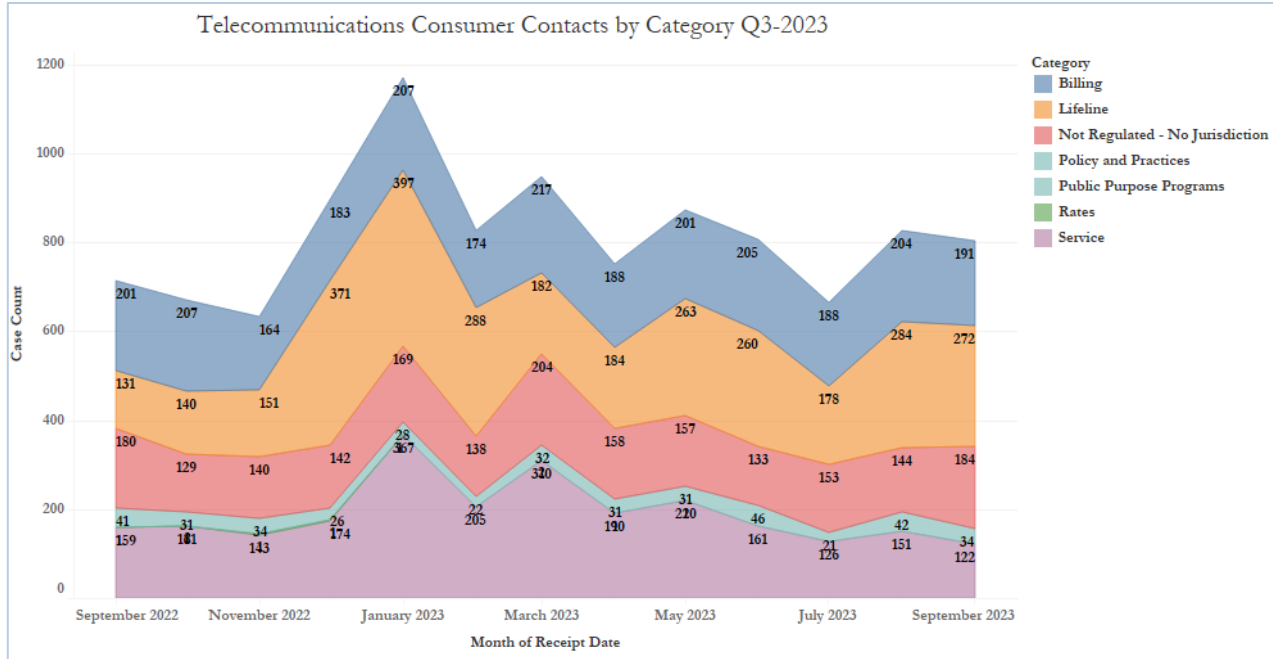


Figure 6: Top-10 Telecommunication Company Consumer Contacts by Category

The number of Service related contacts remained higher than **200 contacts** every month throughout the first and second quarters. However, in the third quarter, there was a significant decline in the service categories, with the highest number of contacts occurring in August with **151** contacts.

Early in Q3, we observe a substantial decrease in LifeLine cases, by August, it returns to a level similar to that of Q2. The LifeLine Category is selected when consumer contacts CAB about disputes related to the Lifeline Program. Disputes CAB handles are either Lifeline Appeals or Lifeline Billing disputes. Cases labeled as "Not Regulated - No Jurisdiction" followed a similar pattern to the second quarter. The Policy & Practices category remained relatively stable, with the number of cases showing consistency with the previous quarters.

This category is selected when consumers contact CAB about the CPUC or utility’s policies and operations. Furthermore, cases related to Public Purpose Programs appeared sporadically, indicating their persistent presence but infrequent. This category is selected when consumers contact CAB about low-income assistance programs such as Universal LifeLine Telephone Service program and programs that assist the deaf and disabled.

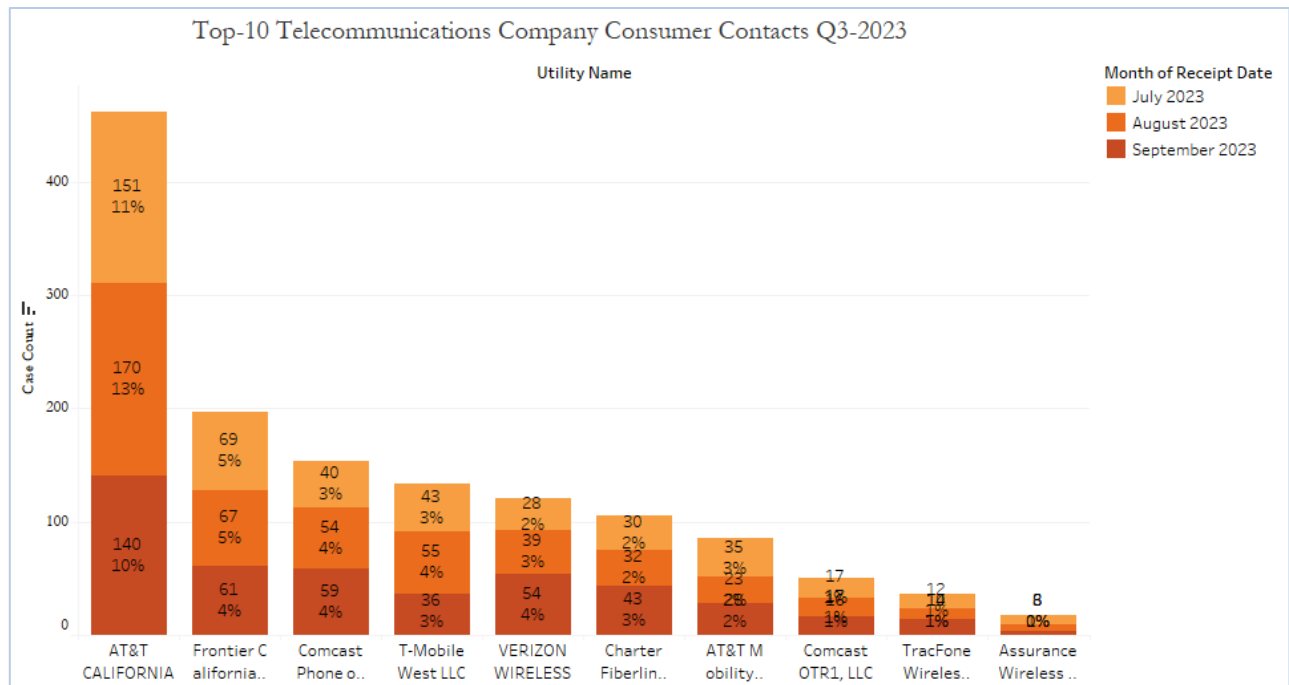


Figure 7: Telecommunication Company Consumer Contacts

Figure 7 above provides an overview of case counts for various utility companies throughout July, August, and September. AT&T California consistently dominates, holding the largest share of both phone and written cases each month. Following closely is Frontier California Inc., maintaining its position as the second-largest contributor. Notably, Comcast Phone of California, T-Mobile West LLC, and Verizon Wireless exhibit noticeable changes in the number of contacts CAB received when compared to Q2 2023. In the second quarter, T-Mobile West LLC received 39 contacts in April, 34 in May, and 31 in June. Transitioning into the Q3, July saw 43 contacts, followed by 55 in August and 36 by the close of September. This clear uptick in the number of contacts during the Q3, and this may be attributed to seasonal fluctuations.

Comcast Phone of California experienced a significant increase in customer contacts during the third quarter. In July, they received 40 contacts, followed by 54 in August and 59 in September. Notably, Q3 exhibited a substantial uptick in contacts when compared to Q2, particularly in the final two months of Q3.

Verizon Wireless, had an increase in contacts by in September, going from 39 contacts in August to 54 in September, which is notably the sharpest raise in contacts compared to any other company.

This data implies that certain utility companies may undergo seasonal variations or encounter shifts in customer service demands, potentially influenced by factors such as network issues, customer complaints, or service disruptions.

Figure 8 illustrates the subcategory frequencies for the top 10 telecommunication utilities in the third quarter of 2023. Analyzing this data reveals several noteworthy patterns and trends. First and foremost, subcategories like NJ Equipment, NJ Internet Billing, High Bill, NJ Customer Service, and Other Charges are consistently prevalent across multiple utility companies. This suggests that common issues are being encountered within the telecommunication sector.

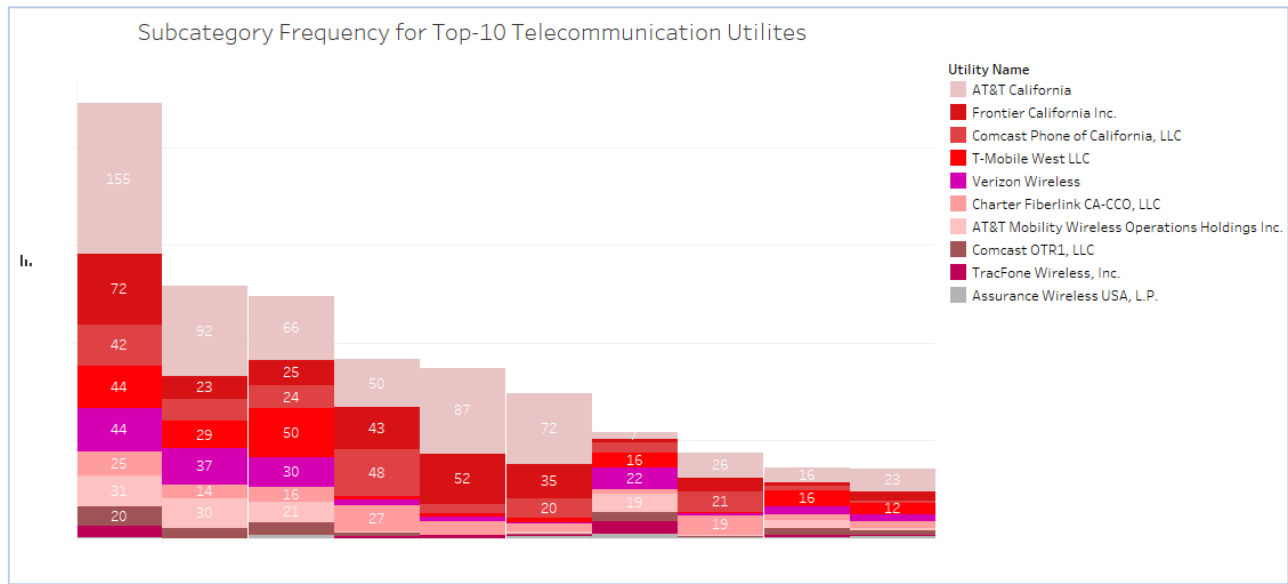


Figure 8: Subcategory Frequency for Top-10 Telecommunication Utilities for Q2-2023

The subcategory Outage is also significant, indicating instances of service disruptions. It is evident that some utilities are grappling with higher case counts in this area, signaling a need for improved service reliability. Notably, AT&T California stands out with a higher frequency across various subcategories, particularly in NJ Equipment, High Bill, and NJ Customer Service. Conversely, Frontier California Inc. exhibits substantial case counts in NJ Customer Service, Delayed Orders/Missed Appointments, and Outage. This data hints at specific areas where each utility could focus on improvement. This may involve addressing customer service concerns or enhancing service reliability to reduce cases related to outages.

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 **Table 8**, we can observe a striking consistency in the engagement levels of LifeLine Billing cases, with a total of **174** cases successfully closed in Q3-2023. The LifeLine Inquiry contacts, comprising written consumer requests for information on LifeLine cases, also maintained a steady trajectory, with **44** cases closed. However, when it comes to LifeLine Landline Appeal cases related to wireline carriers, there was a slight decrease in closure rates compared to the previous quarter, while LifeLine Wireless appeals exhibited a noteworthy increase. Notably, the data underscores the persistent nature of LifeLine Phone Contacts, where consumers reach out to CAB with their concerns, queries, and complaints related to LifeLine. During Q2, **309** LifeLine Phone Contact cases were successfully resolved, and this number increased to **316** in Q3. This analysis of LifeLine contacts closed in Q3-2023 emphasizes the vital role of effective consumer support and resolution mechanisms in addressing an array of consumer needs and concerns.

Table 8: LifeLine Contacts Received and Closed

	2022	2023			% Change
	Q4	Q1	Q2	Q3	Q2 to Q3
LifeLine Contacts Received					
Phone Contacts Received	190	213	309	325	5%
Written Contacts Received	459	629	388	421	8%
Total Contacts Received	649	842	697	746	7%
Top LifeLine Case Types Closed					
LifeLine Appeals	330	619	225	174	9%
LifeLine Billing Cases	279	322	161	172	8%

The Top-10 LifeLine subcategories frequency in Q3-2023 are shown in **Figure 9**.

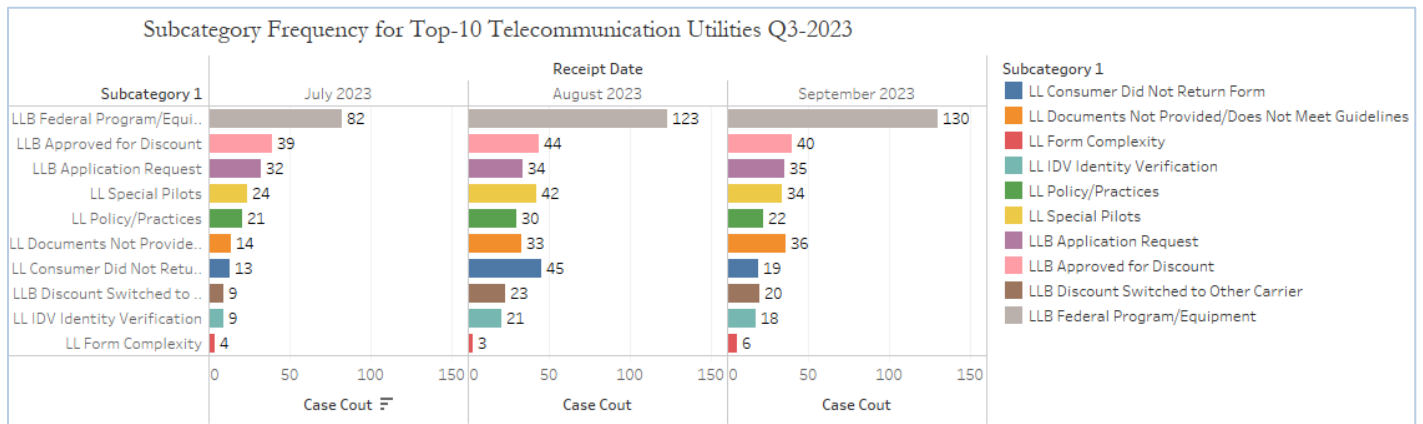


Figure 9: LifeLine Subcategory Frequency Comparison between July, August and September 2023

Cases related to LLB Federal Program/Equipment steadily increased from July to September 2023, but when compared to the end of the second quarter, they decreased in July. This subcategory is selected when consumers have attempted to secure a free or discounted phone through their Federal LifeLine Wireless Carrier but either they did not receive the equipment, or they received a defective handset. LLB Approved for Discount services stayed consistent. This is a scenario where the consumers claim that they are not receiving the LifeLine discount but have already been confirmed by the LifeLine Administrator to receive the discount from this carrier, with their current telephone number.

Instances of LL Documents Not Provided/Does Not Meet Guidelines decreased by the end of Q2 and kept decreasing until the beginning of Q3. This means CAB started receiving complaints about consumers not receiving the correct documents or being rejected because they did not meet the annual income guidelines required to be enrolled in the LifeLine program.

For LLB Application Request (when consumer has attempted to request a new LL application from their carrier but has not received the form and CAB has verified that they are not pending in the Certifying Agents database as a new customer or as a customer attempting to get back onto the program) had a consistent

number of cases and LL Consumer Did Not Return Form (when application and other forms are either not received, or received after due date), had relatively low numbers peaking in August but then going down.

LL Policy/Practices contacts, where a LifeLine consumer expresses dissatisfaction with, or protests a LifeLine-related action or practice of a utility regulated by the CPUC remained relatively stable. LL Form Complexity (consumer finds the application form to be complex).

This data underscores changing consumer needs within the LifeLine program during Q3-2023.

ENVIRONMENTAL SOCIAL JUSTICE (ESJ) CONSUMER CONTACTS FOR Q3-2023

ESJ OVERVIEW

The mission of the CPUC is to regulate essential utility services to protect consumers and safeguard the environment, assuring safe and reliable access to all Californians. CAB is committed to furthering the CPUC's commitment to advance Environmental Social Justice (ESJ) principles by integrating ESJ considerations in our work.

The CPUC identifies ESJ communities as:

- Predominantly communities of color or low-income
- Underrepresented in the policy setting or decision-making process
- Subject to a disproportionate impact from one or more environmental hazards; and
- Likely to experience disparate implementation of environmental regulations and socio-economic investments in their communities.

ESJ communities may also include:

- Disadvantaged Communities
- All Tribal Lands
- Low-income households (defined as household incomes below 80 percent of the area median income); and
- Low-income census tracts (defined as census tracts where aggregated household incomes are less than 80 percent of area or state median income)
- For the purposes of this report, CAB identifies ESJ communities using census tracts that score in the top 25 percent of CalEnviroScreen 4.0 and rolled them up to United States Postal Service (USPS) zip codes.

CalEnviroScreen is a mapping tool that helps identify California communities that are most affected by many sources of pollution, and where people are often especially vulnerable to pollution's effects. The tool uses environmental, health, and socioeconomic information to produce scores for every census tract in the state. The scores are mapped so that the different communities can be compared. An area with a high CalEnviroScreen score is one that experiences a much higher pollution burden than areas with comparatively low scores. CalEnviroScreen ranks communities based on data that are available from state and federal government sources. CalEnviroScreen 4.0 is the latest version and was last updated in October 2021.

CPUC defines Disadvantages Communities pursuant to CalEnviroScreen 4.0 as census tracts that score in the top 25 percent of CalEnviroScreen 4.0, those that score within the highest 5 percent of CalEnviroScreen 4.0’s Pollution Burden but do not receive an overall CalEnviroScreen score, census tracts identified as Disadvantaged Communities in CalEnviroScreen 3.0, and areas under the control of federally recognized Tribes.

TELECOMMUNICATIONS ESJ HIGHLIGHTS

Figure 10 below shows two maps depicting all contacts from consumers who are identified to reside in zip codes where the ESJ Percentile is high (75-100), thus indicating environmentally stressed zip codes. The figure below (right) depicts which counties have the most ESJ Contacts in the 75th to 100th percentile, normalized by the population of the county. It shows the counties where the ESJ populations are most impacted by issues such as LifeLine and Quality of Service. The Red shades counties show a higher ratio of contacts relative to population.

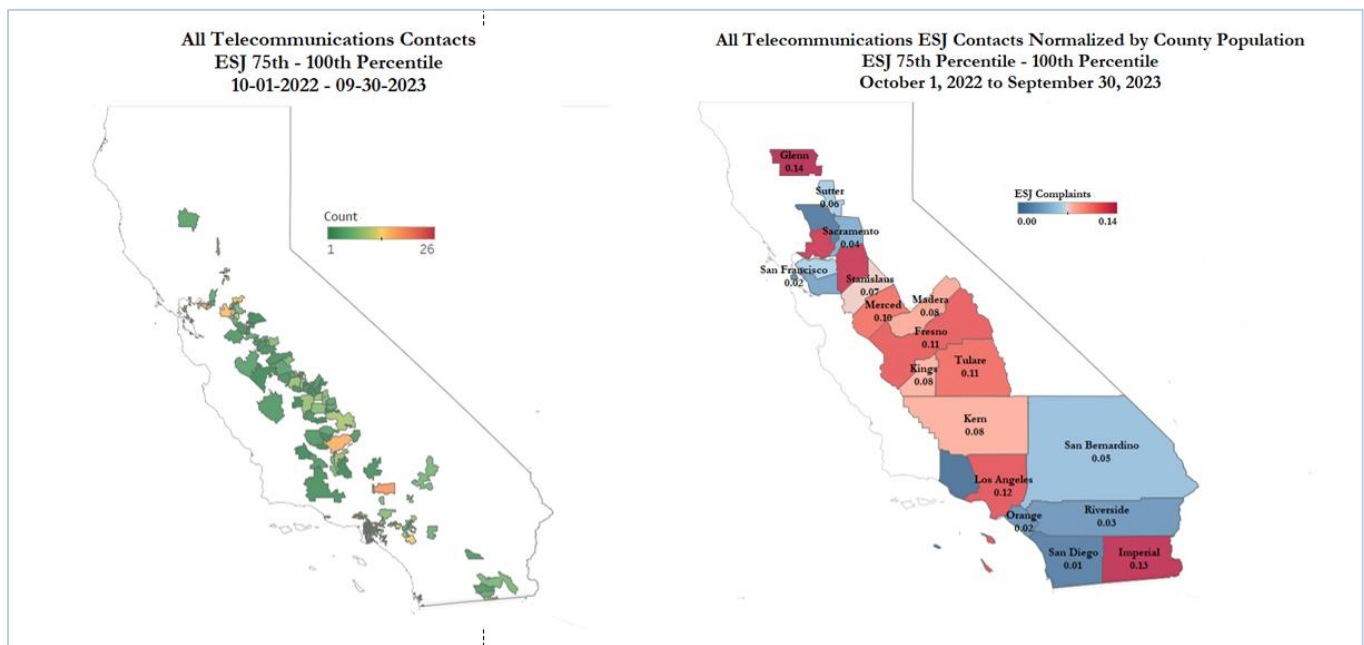


Figure 10: Telecommunications ESJ Contacts

Most of the highly affected counties, as demonstrated by the ratio of ESJ contacts to total population, are located in California’s Central and San Joaquin valleys.

Low-income communities and communities of color in the Southern San Joaquin Valley (Kern, Kings, and Tulare counties) are exposed to severe environmental hazards, including toxic pesticides and some of the worst air quality in the nation. More than **90 percent** of California’s fracking operations take place in Kern County alone. The city of Bakersfield in Kern County ranks as one of the worst in the nation when it comes to particulate matter and ozone pollution. Many of these communities also lack access to basic infrastructure such as roads, clean drinking water, and sewer systems. Despite serving as the agricultural center of the United States, the San Joaquin Valley also faces deep poverty, food insecurity, and unemployment. Kern, Kings, and Tulare counties have

significantly greater percentages of people in poverty and people of color compared to the rest of the state.⁷

In Fresno County, the lack of access to clean water and climate change has exacerbated problems with water quality, availability, and affordability:

- When a group of Fresno youth chose to investigate drinking water issues, over the many other topics they learned about (e.g., air pollution, pesticide exposure, impacts of fracking), two of the three teenagers, the Dominguez Maceda siblings, said that “we have seen firsthand that not all houses in Fresno have clean water. What they learned from the interviews is that in both communities, people do not trust the water quality and they pay high water bills compared to other communities in Fresno County.
- In Cantua Creek, residents receive along with their water bill a notice warning them not to drink or cook with the water from their faucet. The water samples that the youth team took, which were analyzed in a certified lab, verified that this community has high levels of two contaminants, haloacetic acids and trihalomethanes, both of which can cause cancer. Moreover, Cantua Creek residents pay more than \$200 a month for their water bill—for water they cannot drink.⁸

Table 9 below shows the count and distribution of ESJ complaints by category. Lifeline contacts represent the majority, **43 percent**, of ESJ complaints to CAB. Billing and Service issues follow at **23 percent** and **19 percent** respectively.

Table 9 – Distribution of Telecommunications ESJ Consumer Contacts by Category October 1, 2022, to September 30, 2023

Category	Total	Percent
Lifeline	922	43%
Billing	482	23%
Service	399	19%
Not Regulated - No Jurisdiction	262	12%
Policy and Practices	61	3%
Total	2126	100%

Telecommunications customers in zip codes in ESJ communities in top percentiles experienced service problems mostly in the San Joaquin Valley and the Los Angeles area. Outages and Delayed Orders/Missed Appointments dominate consumer contacts received in the service category. The **Figure 11** below shows the distribution of all telecommunications contacts received for customers in the 75th to 100th percentiles.

⁷ [SAN JOAQUIN VALLEY: The Center on Race, Poverty & the Environment \(CRPE\) – California Green Zones \(calgreenzones.org\)](https://calgreenzones.org/)

⁸ [Water and Environmental Justice in the Central Valley - Community Alliance \(fresnoalliance.com\)](https://fresnoalliance.com/)

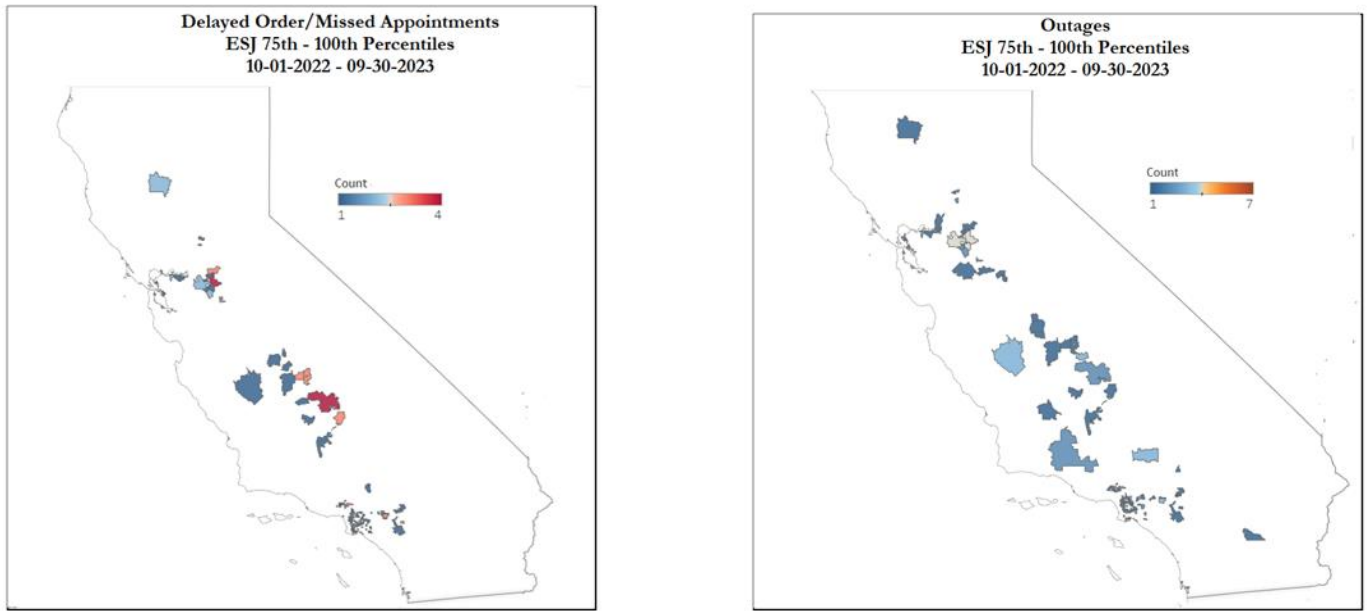


Figure 11: Delayed Orders/Missed Appointments and Outages Contacts ESJ 75-100 Percentile

Figure 12 below shows two additional indicators of service quality. In addition to Outages and Delayed Orders, contacts related to Disconnection Non-Payment and Call Quality are frequently reported. Note the concentrations of contacts related to these service issues in the southern San Joaquin Valley.

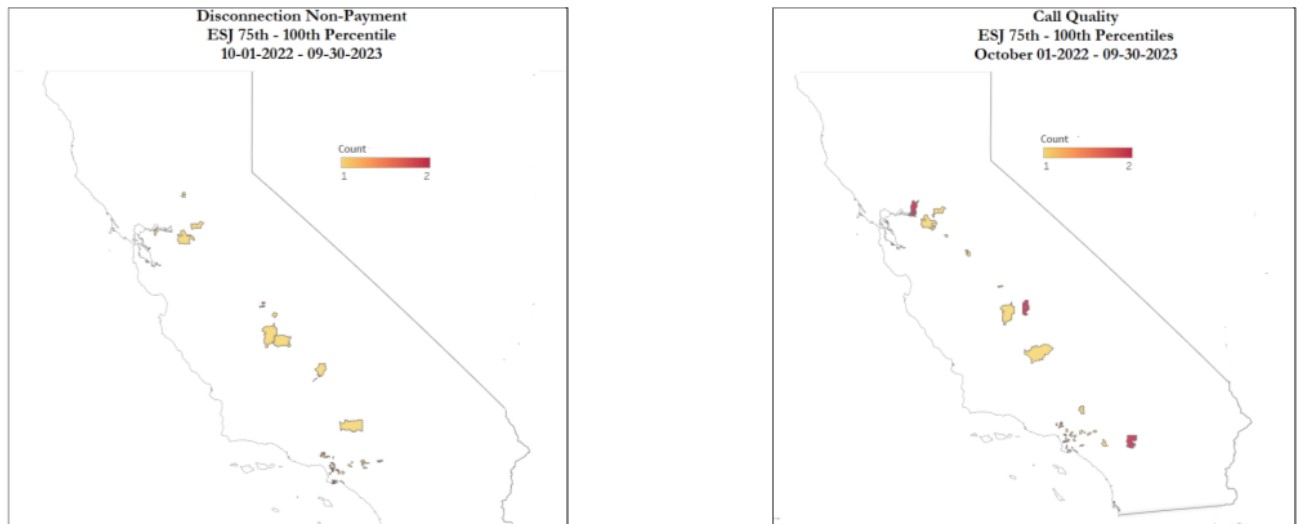


Figure 12: Disconnection Non-Payment and Call Quality Contacts ESJ 75-100 Percentile

LIFELINE ESJ HIGHLIGHTS

43 percent of the telecommunications contacts received from high ESJ percentile zip codes were related to LifeLine. **Figure 13** below shows the geographic distribution of Lifeline related ESJ consumer contacts. Note the “hot spots” for Lifeline complaints in the southern San Joaquin Valley.

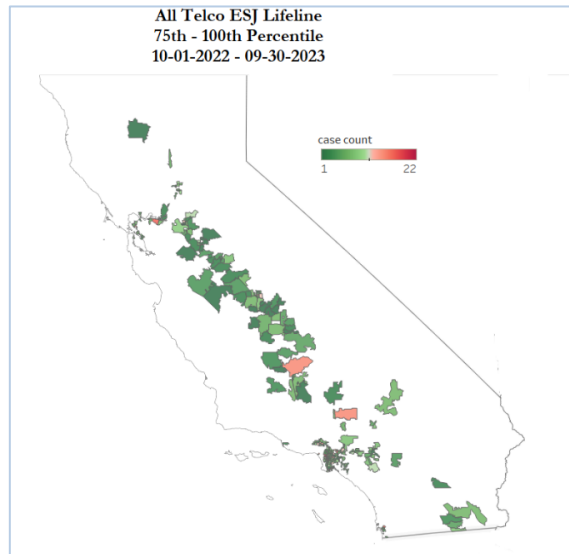


Figure 13: All Telco ESJ LifeLine Contacts 75-100 Percentile

Between October 1, 2022 and September 30, 2023, CAB received **918** consumer contacts about their problems with Lifeline (**Table 10**).

Table 10: LifeLine ESJ Contacts 75th - 100th Percentile

Primary Subcategory	Count
LLB Federal Program/Equipment	217
LL Consumer Did Not Return Form	161
LLB Application Request	109
LL Documents Not Provided/Does Not M	103
LLB Approved for Discount	81
LL IDV Identity Verification	62
LLB Discount Switched to Other Carrier	54
LL Policy/Practices	35
LL Form Complexity	26
LL Initials Missing	21
LL SSN/DOB/TRIBAL ID Not Provided	15
LL Signature/Printed Name Does Not Ma	11
LL Special Pilots	11
LLB Address Error	6
LL ASSIGNMENT PENDING	1
LL No Carrier Authority	1
LL Nondeliverable	1
LL Qualifying Method Not Selected	1
LL Tribal	1
LLB New Phone Service Not LL Eligible	1
Total	918

The most common complaints CAB has received for the LifeLine program revolve around the federal program and equipment subcategory. This subcategory is selected when a consumer attempts to acquire a free or discounted phone through their Federal LL Wireless Carrier but faces issues like not receiving the equipment or receiving a defective handset. These consumers have already exhausted all options with the company's customer service in their quest to obtain a working handset to initiate the Federal LL process. Notably, this subcategory constitutes nearly **24 percent** of all LifeLine contacts, totaling **217** cases. Another significant subcategory pertains to LifeLine consumers who did not return the required form. This accounts for **18 percent** of all LifeLine cases related to ESJ. It is selected when we lack evidence of the Application Form being returned, household worksheets not being submitted with the Application Form, or when the application is received after the due date. Additionally, issues related to LLC Application Requests and LL Documents not meeting guidelines also contribute significantly to ESJ LifeLine cases. These challenges underscore a critical concern. The ESJ action plan aims to acknowledge the disproportionate impact of environmental hazards in communities of color and identify ways in which the CPUC can address them. To further this ESJ plan, it's imperative to reduce the number of LifeLine cases.

ENERGY ESJ HIGHLIGHTS

The table below shows the upward trend of energy related contacts from consumers who live in zip codes where their ESJ Percentile is calculated between 75 and 100. Complaints exhibit an upward trend over the previous three quarters. The spike in the number of contacts during the first quarter of 2023 is attributed to consumers' reaction to rate increases that occurred during the first 3 months of 2023.

Table 11: Energy ESJ Contacts 75th - 100th Percentile, Q4-2022 to Q3-2023.

ESJ Contacts Percentile	2022 Q4	2023 Q1	2023 Q2	2023 Q3
Energy ESJ 75 - 100	502	1,411	761	936

Figure 14 below shows two views of these contacts. The map on the left shows the distribution of the count of consumer contacts by zip code. The map on the right shows these same contacts aggregated from zip code to county and then normalized by the population count of each county. The normalization shows the relative ratios of ESJ contacts to the county population which allows us to begin to gauge the relative impacts of various energy related issues between counties. As with telecommunications ESJ customers, the most heavily impacted customers reside in the Central and San Joaquin Valleys. For a more detailed picture of these regions, please refer to the Telecommunications ESJ section in this report.

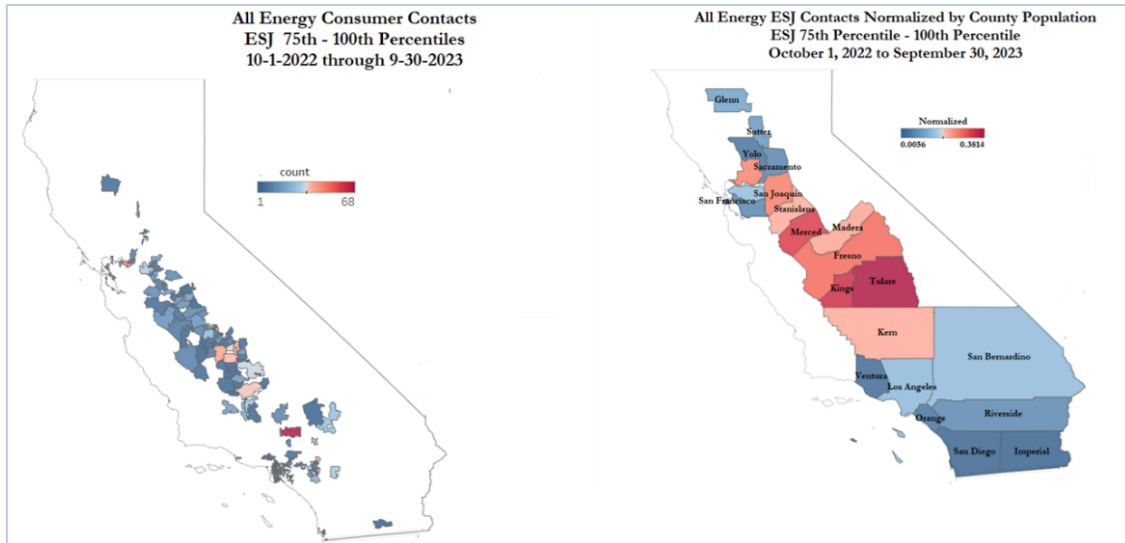


Figure 14: Disconnection Non-Payment Contacts Increased Dramatically Over the Previous 12 Months for Highest Percentile ESJ Communities

During the third quarter of 2023, **31 percent** of the contacts ESJ contacts received were related to their services being or about to be disconnected for non-payment. The figure below shows the geographic distribution of consumer contacts where disconnection for non-payment was involved. The growth of contacts over time is easily visible.

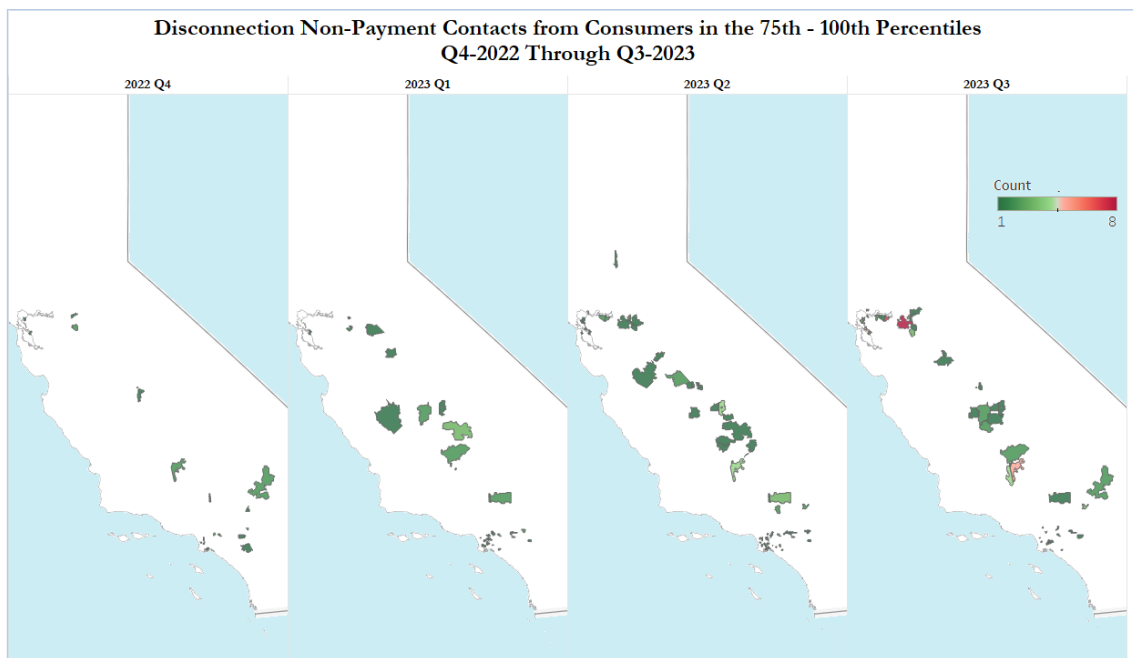


Figure 15: Disconnection Non-Payment Contacts in ESJ 75-100 Percentile, Q4-2022 to Q3-2023

The rate of growth is shown more profoundly in **Table 12** below. Consumers in the 75th to 100th percentiles show substantial growth rates near or over **100 percent** for two of the three quarters where change is

measured. The table also shows the other three quartiles on the ESJ spectrum. The lower ESJ percentiles correspond to zip codes where consumers have increased amount of income and decreased environmental hazard and exposure. This table shows that all quartiles are demonstrating significant increases in contacts with CAB to get assistance for energy bills that are increasingly more difficult to pay, and even the wealthier communities are not immune.

Table 12: Energy Disconnection Non-Payment Contacts in ESJ 75-100 Percentile, Q4-2022 to Q3-2023

ESJ Percentile	2022 Q4	2023 Q1	% Change Q4-Q1	2023 Q2	% Change Q1-Q2	2023 Q3	% Change Q2-Q3
75-100 Percentile	25	49	96%	104	112%	125	20%
50-74 Percentile	17	26	53%	85	227%	85	0%
25-49 Percentile	12	15	25%	57	280%	54	-5%
0-24 Percentile	5	13	160%	18	38%	28	56%
Total	59	103	75%	264	156%	292	11%

TEAM AND CHANGES

In addition to the consumer 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, 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 **24** Community-based Organizations (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 Q3-2023, CBOs provided case assistance to **2,896 consumers**, for financial and other needs (e.g., CARE/LifeLine or other financial assistance programs), or with utility disputes. This was a small decrease of **5 percent** from the previous quarter, as shown in **Table 13**. CBOs also provide education on a range of topics to assist them in managing their utility services. In the third quarter, these education classes had an attendance of **20,406**, which was a decrease of **22 percent** compared to the previous quarter but still higher than any quarter in 2022.

Finally, the TEAM program helped consumers resolve disputes with their telecommunications provider that resulted in reclaiming **\$20,406**, on their behalf in the third quarter. Over the last four quarters, CBOs reclaimed just over **\$104,000** from telecommunications providers on behalf of their TEAM clients.

Table 13: CBO Case Support and Education Services Provided and Amount Received

	2022 Q4	2023 Q1	2023 Q2	2023 Q3	Total
Individual Case Support	2,196	3,004	3,060	2,896	11,156
Education Provided	13,282	21,557	26,156	20,406	81,401
Amount Recovered (TEAM)	23,813	24,123	30,817	25,704	104,457