San Francisco Local Agency Formation Commission
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November 20, 2020

TO: LAFCo Commissioners

FROM: Bryan Goebel, Executive Officer

SUBJECT: Item 4_Presentation and Discussion on the LAFCo report, "Power is a Right: Preventing a Disconnection Crisis in San Francisco During and After COVID-19."

Today LAFCo research associate Adiba Khan presents her report on how San Francisco can prevent a power disconnection crisis during and after the COVID pandemic. It is a call to action to help our City's most vulnerable utility customers who are struggling to pay their bills and facing a looming crisis as those charges pile up and their financial situation worsens.

While there is a moratorium in place barring disconnections during the pandemic, there is currently no guarantee those customers whose utility debt is rising won't have their power shut off when the pandemic ends. That's why it's critically important the City move to prevent a disconnection crisis.

I want to thank and commend Ms. Khan for putting this report together over a short period of six weeks during the most extraordinary time. I urge the Commission to carefully read through the report and seriously consider how to advance the recommendations she has put forth.

RECOMMENDATION: Receive the report and offer overall feedback, and suggestions for next steps.

Attachments: *"Power is a Right* Preventing a Disconnection Crisis in San Francisco during and after COVID-19: Recommendations for LAFCo, CleanPowerSF, and Board of Supervisors."

Power is a Right
Preventing a Disconnection Crisis in San Francisco during and after COVID-19: Recommendations for LAFCo, CleanPowerSF, and the Board of Supervisors

FINAL DRAFT

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San Francisco LAFCo Research Associate
Coro Northern California
Fellow in Public Affairs
November 9, 2020

Introduction

I am a Public Affairs Fellow for Coro Northern California and have been tasked for six weeks as the Research Associate for LAFCo. The Coro Fellows program develops emerging leaders to work and lead across different sectors, including government, "by equipping them with knowledge, skills, and networks to accelerate positive change." LAFCo's Executive Officer, Bryan Goebel, asked me to analyze a recent California Public Utilities Commission (CPUC) ruling that addresses power disconnections among low-income utility residents, Senate Bill 598's primary requirement. My research aims to gain a more thorough understanding of the problem and issues facing San Francisco utility residents struggling to pay their bills. This report seeks to identify potential policy solutions to help correct historical wrongs and reduce or eliminate disparities so that all San Franciscans can access affordable and sustainable power.

Acknowledgments

Researching, scheduling interviews, accessing essential stakeholders, and drafting a report has proven challenging in just four weeks, including Election Day. My report is a follow-up to former LAFCo CleanPowerSF Intern Winston Parson's November 2019 report[1]"Advancing Equity and Community Investment in CleanPowerSF." A special thanks to Mr. Parsons for building critical groundwork a year ago that continues to be relevant today during the novel COVID-19 pandemic, and as California faces more raging wildfires, and to Executive Officer Goebel, for support in an expedited timeline.

Thank you to all who took time to speak with me: Gabriela Sandoval, Director of Strategic Initiatives at the Utility Reform Network (TURN); Fernando Martí, Co-Director of the Council of Community Housing Organizations (CCHO); Citlalli Sandoval, Public Utilities Regulatory Analyst at the San Francisco Public Utilities Commission (SFPUC); Brittani Gallagher, Customer Solutions Analyst at CleanPowerSF; Michael Hyams, Director of CleanPowerSF; Daniela Suarez, Community Relations Specialist at San Francisco Peninsula Energy Services (SFPES); Glenn Lallana, Program Manager at SFPES; Lizet Moreno, Director of Marketing & Outreach at SFPES, Justin Marquez, Community Equity Specialist at Marin Clean Energy (MCE); Mara Blitzer, Director of Affordable Housing Projects at SF Mayor's Office of Community and Housing Development (MOHCD); and LAFCo Commissioner Shanti Singh, the Alternate Member of the Public.

Executive Summary

In 2017, the California Legislature passed SB 598, by Assemblymember Ben Hueso, which was signed into law by then-Governor Jerry Brown, requiring The California Public Utilities Commission (CPUC) to "develop policies, rules, or regulations with a goal of reducing, by January 2024, the statewide level of gas and electric service disconnections for nonpayment by residential customers." In June 2020, CPUC issued a decision[2] that requires PG&E to offer a

[1] https://sfgov.org/lafco/sites/default/files/lfc111519_item4.pdf
[2] https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M340/K648/340648092.PDF

12-month debt repayment plan and one main debt relief program. CPUC did not construct this program as a COVID-19 relief program, but a general one. This is referred to as the "decision" in the report.

Ultimately, CPUC's decision is insufficient to prevent utility debt accumulation during the moratorium and prevent power disconnections post-moratorium for low-income SF residents. I will present the most pertinent sections of the 176-page ruling and its impact on protecting low-income and vulnerable population residents. Ultimately, San Francisco will have to act to make up for the shortcomings of the CPUC's decision to ensure residents can afford their public utility bills and not accrue debt lest PG&E disconnects residents once the moratorium ends in April 2021.

Recommendations

My paradigm is short-term emergency "act now" recommendations (Section 1) and non-emergency (but still urgent) recommendations (Section 2).

Short-term: Eliminate debt accrual and expand low-income assistance programming and coverage to prevent post-moratorium disconnections:

1. The SFPUC should strongly urge the CPUC in its rulemaking process to extend the April 2021 disconnection moratorium to parallel the entire duration of the COVID-19 pandemic. It should build support for this request with other community choice energy providers in California and the California Advocates for Community Choice (CalCCA) in California.

    a. SFPUC and CleanPowerSF should have a plan for April 2021 to prevent disconnections.

2. Suppose the CPUC fails to act to extend the disconnection moratorium. In that case, the SFPUC should consider urging the Governor's Office and state legislators to extend the moratorium through executive order or statewide legislation.

3. The Board of Supervisors should pass a Resolution calling on the CPUC to extend the disconnection moratorium for the duration of the COVID-19 pandemic, specifically SF and CA's state of emergency declaration, and urge the agency to consider other measures to forgive the debt and lessen the overall financial burden of low-income utility customers.

4. If the CPUC's rulemaking process fails to require more transparency from PG&E on how the company calculates the Power Charge Indifference Adjustment (PCIA) charge, the SFPUC, and the City should pursue state legislation that compels the utility to shed light on these fees. *CleanPowerSF stated during LAFCo's October 2020 meeting*[3] *"customers pay PG&E approximately $101 million per year through the PCIA charge on their*

[3] https://sfgov.org/lafco/sites/default/files/lfc091820_item3.pdf

bills…and this is expected to increase in 2021." Approximately $4,574,607 of this charge could instead go to eliminating the total utility bill debt SF residents owe as of October 2020[4]. Many more millions could go towards expanding low-income assistance programs or reducing SF's emissions impacts at a faster pace.

5. The Board of Supervisors should pursue all local, state, and federal funding sources to eliminate all debt from delinquent accounts for low-income residents as soon as the disconnection moratorium ends.

    a. LA passed a motion[5] to require their public utility commission to report back with a debt relief and forgiveness program for low-income residents.

        i. LA allocated $50 million from their $694 million from the Coronavirus Aid, Relief and Economic Security (CARES) Act.

        ii. If the SFPUC is not already planning to do so, Board of Supervisors should consider following suit.

    b. SF received $48 million in CARES funding but none went to utility assistance efforts.

        i. If there is another round of CARES funding, ensure adequate funding goes to public utility low-income assistance.

    c. Resolution 201196 (Supporting Low-Income Rate Assistance Power Program)[6], referred for adoption during the November 2020 Board of Supervisors meeting, is a step in the right direction but insufficient because it is symbolic support. This resolution provides a strong basis for the Board of Supervisors to pass an ordinance requiring SFPUC to develop a plan (similar to LA City Council) to prevent disconnections, while strengthening outreach for existing programs and develop projects to reduce low-income customers' overall energy burden.

    d. Urge the CA legislature to allow cities to implement income tax for high-income residents for the duration of the pandemic.

        i. Re-introduce previously successfully passed SF resolution supporting passage of (unsuccessful) CA legislation "to amend the Revenue and Taxation Code to enable San Francisco to levy personal and corporate income taxes"[7].

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[4] See Figures H, I, J
[5] https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=20-1043
[6] https://sfgov.legistar.com/View.ashx?M=F&ID=8870234&GUID=1FA05C1C-21AD-4C22-84B6-2604C0F42C36
[7] https://sfBoard of Supervisors.org/sites/default/files/r0096-17.pdf

    ii. Request CA bill sponsor and SF Assemblymember Phil Ting (D-19) to re-introduce state legislation.

6. SFPUC and CleanPowerSF should urge CPUC to revise CARE/FERA income eligibility guidelines by revoking the "one size" fits all standard across the state and implementing county or regional standards using the U.S. Department of Housing and Urban Development's (HUD) metropolitan average median income (AMI) as a basis.

7. CleanPowerSF (CleanPowerSF) should provide additional funding assistance to CARE/FERA residents and residents who are classified as low-income by SF standards but ineligible for CARE/FERA/LIHEAP for assistance with monthly bills.

    a. Create a campaign: The COVID-19 Public Utility Relief Fund

        i. Ask residential and commercial participants to voluntarily self-tax on the monthly bill (example: 1% of the total bill). Use similar framing as "SuperGreen" program[8].

        ii. Ask residential and commercial participants to donate.

        iii. Reach out to specific potential individual donors or foundations.

    b. Implement the percentage of monthly income plan, use low-income standards per SF cost of living for eligibility.

        i. The same LA motion includes this plan.

8. CleanPowerSF should identify funding to forgive all debt resulting from Section 8 residents' delinquencies to prevent eviction after the disconnection moratorium.

    a. CleanPowerSF or the Board of Supervisors can urge HUD and the Mayor's Office of Housing and Development (MOHCD) to work to change the guidelines that allow a Section 8 resident to be evicted if they can't afford to pay their utility bills.

9. Based on LAFCO's September[9] and October[10] 2020 meetings, it is unclear what CleanPowerSF's racial equity plan is (including specific, measurable outcomes) and what relationships they have built with community-based organizations to find hard-to-reach vulnerable populations thus far. SFPES states it has established relationships with CBO's in the top disconnected zip codes and could partner with CleanPowerSF in these efforts.

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[8] https://www.cleanpowersf.org/supergreen
[9] https://sfgov.org/lafco/sites/default/files/lfc091820_item3.pdf
[10] https://sfgov.org/lafco/sites/default/files/lfc101620_item3.pdf

a. CleanPowerSF should hire a "Community Equity Specialist," like MCE, and work with Local and Regional Government Alliance on Race & Equity (GARE)[11] to develop a Racial Equity Plan framework that involves communities with the highest disconnection rates in CleanPowerSF decision-making processes.

    i. MCE's Community Equity Specialist, Justin Marquez, "serves as a liaison to key stakeholders including local government partners, businesses and community advocates, connecting residents to MCE services and programs"[12] which means establishing relationships with Board of Supervisors to center low-income residents and communities in decision-making processes and program development.

        1. This person can guide and build relationships with CBO's and develop a coalition similar to MCE's Community Power Coalition[13].

        2. Marquez recommends GARE in developing an environmental justice plan.

b. Assessing CleanPowerSF's staff structure,[14] CleanPowerSF should seriously consider making their leadership structure diverse, as there are no people of color in the highest positions of power. Moreover, leadership positions should include people of color from the communities that suffer the highest disconnection rates and have been impacted the most by COVID-19, historical disenfranchisement, and environmental injustice due to living close to PG&E's power plants[15], for example, Bayview Hunters Point.

    i. Parsons made a similar recommendation last year, and it is unclear what progress has been made since then.

    ii. CleanPowerSF should identify a timeline that would be feasible for them to achieve this within and share that with LAFCo.

c. CBO relationships are necessary but not sufficient by themselves as they are often already tasked with many existing responsibilities and inadequate resources to meet them. CleanPowerSF should hire staff from these communities, given historical economic and environmental disenfranchisement disproportionately impacting Black, Latinx, and Asian residents.

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[11] https://www.racialequityalliance.org/
[12] https://www.mcecleanenergy.org/our-team/
[13] https://www.mcecleanenergy.org/community-power-coalition/
[14] https://sfpuc.sharefile.com/share/view/s96af3238f1144eb9
[15] See 1

Longer-Term: Energy Efficiency and Renewable Back-Up Storage:

1. CleanPowerSF/SFPUC should create a staff position to serve as a centralized "energy hub information source knowledgeable about current energy efficiency low-income assistance programming. CleanPowerSF advertises this number to all its customers. This "energy hub information" could be part of San Francisco's 311, as this is the number an SF resident can call to inquire about non-emergency San Francisco (or 415-701-2311 for numbers with an area code other than 415).

2. CleanPowerSF's potential "Community Equity Specialist" position(s) can work on the expansion of equity efficiency programs.

3. CleanPowerSF should work with ENV to establish a partnership with MOHCD to expand solar + storage for new AHPs.

Methodology

This report is in itself limited in scope by its being crafted in four weeks. I conducted a literature review of government reports from CPUC, LAFCo, and CleanPowerSF. The bulk of my research was from interviews with the people listed in the acknowledgments. Lastly, I collected data on disconnections that PG&E is required to submit to CPUC, delinquency accounts data from CleanPowerSF, and data on the scope of LIHEAP assistance and home weatherization projects from SFPES. I also compared my findings with data Parsons presented in 2019 to signify recurring patterns and changes.

Section 1: CPUC Decision Analysis[16]

CPUC's new policies are insufficient in protecting and supporting San Francisco residents with unaffordable utility bills. What *would* be sufficient is if CPUC had created an assistance program that considers SF's higher cost of living by expanding eligibility requirements, and implementing a percentage of income plan, guidelines *informed* by utility access advocates. More often than not, CPUC declined the utility advocate's recommendations in its decision and deferred to the requests of PG&E. Moreover, CPUC should have also included a specific debt forgiveness plan for COVID-19 (as it issues the decision in June 2020, three months after implementing the disconnection moratorium), but alas, did not.

It is important to note that California issued a moratorium on power disconnections[17] and a waiving of late fees until April 2021. However, TURN advocate Gabriela Sandoval points out that residents are still obligated to pay their full utility bills during the moratorium. In contrast, California issued rent and eviction relief for those economically impacted by COVID-19. If a tenant submits declarations of COVID-19 financial distress to their landlord and pays

[16] See 2
[17] See 1

25% of their rent, their landlord cannot evict[18] (applicable only from September 2020 to January 31, 2021). While PG&E is not shutting off people's electricity for falling short on payments and waiving late fees, it still charges a monthly utility bill that if a resident does not pay, they accrue debt (arrearage) during the moratorium. There is no explicit language if PG&E is required not to issue future punitive fees for debt possession after the moratorium ends.

While it may be the case that California extends the moratorium past April 2021, even if California extends the moratorium to align with the duration of the COVID-19 pandemic, PG&E will still obligate a resident to pay off their debt and monthly bills once the moratorium ends. *Sandoval from TURN is anticipating a significant portion of low-income residents will have their power shut off when California lifts the COVID-19 moratorium because of a lack of state support and economic opportunities.*

Another factor to consider is the risk of disconnections leading to wildfires. People who are disconnected may "daisy chain"[19] their extension cords to receive power from their neighbors, and the main hazard to this is fires. This fact should probably be considered as California faced hundreds of wildfires in 2020.

I will highlight the main aspects of the decision-making process and the decision implemented concerning San Francisco's IOU, Pacific Gas & Electric (PG&E), CleanPowerSF, and low-income and vulnerable residents.

1. Decision on Low-Income Bill Assistance Programming

A. PG&E cannot disconnect a resident until it offers to enroll the resident in all applicable low-income programs they may be eligible for, specifically California Alternate Rates for Energy (CARE) & Family Electric Rate Assistance Program (FERA), until it:
   a. Offers to sign up a resident for a 12-month payment plan
   b. Offers to sign up a resident for a 12-month Arrearage Management Plan (AMP) if eligible (see pg. 15 for details)
   c. Inquires whether a resident is in the process of applying for and receiving a LIHEAP pledge

B. PG&E does not have an affirmative obligation to inform residents of low-income assistance programs but is obligated to notify a resident of programs it administers (CARE/FERA) once the resident falls short on payment.

C. To avoid disconnection, a resident should agree to sign up for eligible benefits programs within two billing cycles and agree to a 12-month payment plan or AMP.

What is California Alternate Rates for Energy (CARE) and the Family Electric Rate Assistance Program (FERA)?

[18] https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201920200AB3088
[19] https://www.ehs.harvard.edu/sites/default/files/daisy_chaining_fact_sheet.pdf

"Low-income residents that are enrolled in the CARE program receive a 30-35% discount on their electric bill and a 20% discount on their natural gas bill...Families whose household income slightly exceeds the CARE allowances will qualify to receive the FERA discount, which bills apply an 18% discount on their electricity bill."[20] CPUC determines CARE/FERA eligibility guidelines and discount rates. PG&E provides the CARE/FERA discount.

CARE Income Guidelines*	
Household Size	Income Eligibility Upper Limit
1-2	$34,480
3	$43,440
4	$52,400
5	$61,360
6	$70,320
7	$79,280
8	$88,240
Each Additional Person	$8,960
* Effective June 1, 2020 to May 31, 2021	

(Figure A)[21]

20 https://www.cpuc.ca.gov/lowincomerates/#:~:text=For%20the%20CARE%20Program%2C%20electrical,Public%20Utilities%20Code%20Section%20739.1.&text=CARE%20is%20funded%20through%20a,by%20all%20other%20utility%20customers.

21 https://www.cpuc.ca.gov/lowincomerates/

Household	200% of Federal Poverty Guidelines (CARE/ESAP) +1	250% of Federal Poverty Guidelines (FERA)
3	$43,441	$54,300
4	$52,401	$65,500
5	$61,361	$76,700
6	$70,321	$87,900
7	$79,281	$99,100
8	$88,241	$110,300
Each Additional Person	$8,960	$11,200

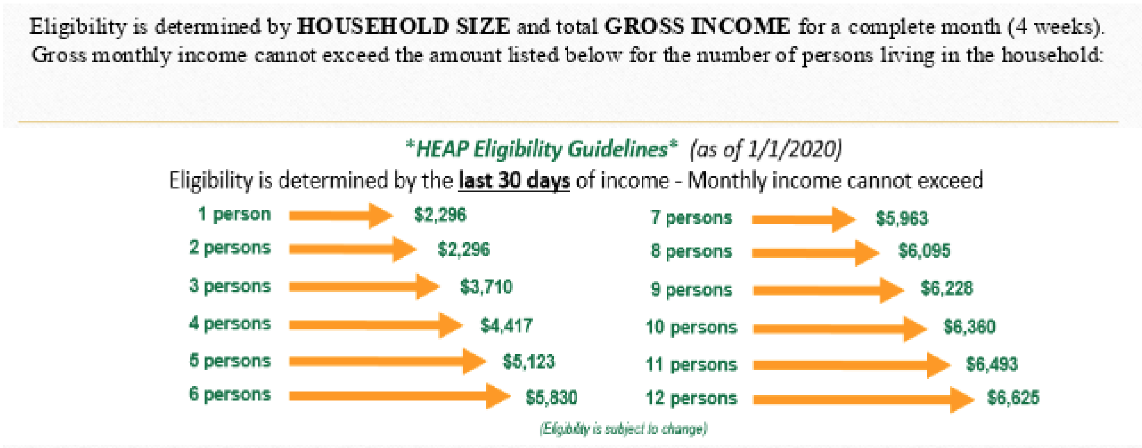
(Figure B)[22]

What is the Low-Income Home Energy Assistance Program (LIHEAP)?

"The 2020 LIHEAP program provides a one-time per calendar year credit on utility accounts of up to $433." The program covers electric and gas accounts.[23] Daniela Suarez, Community Relations Specialist at Central Coast Energy Services, says that in some instances where a household has received a disconnection notice and is near $500 in debt, LIHEAP can cover up to $1000 in utility debt on an account. One key distinction is that while California determines CARE/FERA guidelines, LIHEAP is a federal government program that determines eligibility and procedures.[24] In California, LIHEAP funding and programming are administered through an affiliate within the California Department of Community Services and Development (CSD). San Francisco's LIHEAP Local Service Provider (LSP) is San Francisco-Peninsula Energy

[22] See 15
[23] SFPES Presentation on LIHEAP, 10/27/20
[24] https://consumers.cpuc.ca.gov/consumerprograms/

Services (LSP).[25] SFPES can also enroll a resident for CARE/FERA and obtain resident consent to verify with PG&E if a resident is enrolled in CARE/FERA.



(FIGURE C: LIHEAP Monthly Income Eligibility)[26]

Household Size	Yearly Income
1	27,552
2	27,552
3	44,520
4	53,004
5	61,476
6	69,960
7	71,232
8	73,140
9	74,700
10	76,320
11	71,423
12	79,500

[25] https://sfpes.org/
[26] *See* 11

(FIGURE D: LIHEAP Yearly Income Eligibility)[27]

FY 2020 Income Limit Area	Median Family Income Explanation	FY 2020 Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
San Francisco, CA HUD Metro FMR Area	$143,100	Very Low (50%) Income Limits ($) Explanation	60,900	69,600	78,300	**87,000**	94,000	100,950	107,900	114,850
		Extremely Low Income Limits ($)* Explanation	36,550	41,800	47,000	**52,200**	56,400	60,600	64,750	68,950
		Low (80%) Income Limits ($) Explanation	97,600	111,550	125,500	**139,400**	150,600	161,750	172,900	184,050

(FIGURE E: HUD 2020 San Francisco Metropolitan Area Low-Income Categorization)[28]

Based on the Department of Housing & Development (HUD) 2020 yearly income classification in San Francisco, a one-person household threshold is "low-income" at $97,600, "very low-income" at 60,900, and "extremely low-income" at $36,550. Any "extremely low-income" 1-3 person household that meets the income maximum threshold in San Francisco does not qualify for CARE. All homes with 4 to 8 people must be at or under the maximum classification of "very-low-income" to qualify. FERA has higher income thresholds than CARE for households with three or more, but still has cut-offs below the "very low-income" classification. Moreover, FERA offers an 18% discount compared to CARE's 35% off (electric) discount.

The discrepancy between CARE/FERA/LIHEAP eligibility and low-income classification threshold in San Francisco is not a novel issue. During LAFCo's November 2019 meeting, former LAFCo intern Winston Parsons presented disconnection data to the commission. Parsons calculated disconnection rate data by combining cumulative disconnections across a year and dividing it by the total number of accounts at the end of the year from 2016-2018. Parsons conveyed that 1) residents classified as low-income by HUD may be ineligible for low-income assistance but still face disconnections given the existence of disconnection rates in general and 2) residents who are eligible for low-income assistance programs and enrolled may not receive an excellent discount to prevent disconnection given significant disconnection rate of CARE and FERA residents among all disconnected residents.

In Figure F, the left and middle column are Parsons' data. For the column on the right, I used the same methodology as Parsons and calculated the overall disconnection rate from 2019 up to February 2020, the last month before California implemented a COVID-19 pandemic moratorium in March 2020. The zip codes that appear at least twice among the 2016-2018

[27] *See* 11

[28] https://www.huduser.gov/portal/datasets/il.html

overall disconnection rate and CARE disconnection rates and overall disconnection rates from 2020 to moratorium are highlighted below.

Comparing the overall disconnection rate from 2016-2018 and 2019 to February 2020, a 60% zip code overlap. Moreover, between the highest CARE disconnection rates from 2016 - 2018 and overall disconnection rates from 2019 - February 2020, there is a 70% overlap. However, there is a slight decrease in overall disconnection rates across time. (Unable to ascertain the change in CARE disconnection rate as data from PG&E is pending.) The reasons for the overall disconnection rate decrease could be because of several reasons:

1. Increase in the rate of enrollment in CARE/FERA assistance programs
    a. CleanPowerSF or PG&E could answer this question.
2. Increase in rate of enrollment in LIHEAP assistance program
    a. Most likely, not the reason why there is an overall decrease in disconnections as SFPES data demonstrates a general reduction in LIHEAP enrollment in the highest disconnected rate zip codes (see Figure G).
3. Increase in cost of living, rent, gentrification, and evictions
    a. Forty percent of neighborhoods in the top 10 disconnection rates from 2016 - February 2020 are also neighborhoods facing more intense rises in rent, gentrification, and displacement in comparison to the rest of the City: Portola[29] and Visitacion Valley[30] (rising cost of property), SOMA and Tenderloin (most evictions in San Francisco)[31]
4. Increase in residents "self-eviction" due to inability to pay utility bills
    a. Sandoval of TURN stated that many residents, knowing PG&E will shut off their power because they cannot afford the bill, have moved out of their residence to move into another unit with friends or family members. Sandoval stated that there might not be data on the extent of this phenomenon, given it is not a "formal" eviction.
5. Energy Efficiency Programming

[29] https://www.nytimes.com/2019/11/26/realestate/the-portola-san-francisco-low-slung-houses-and-rising-prices.html
[30] https://www.realtor.com/news/trends/san-francisco-neighborhoods-where-home-prices-have-skyrocketed/
[31] https://sf.curbed.com/2016/7/13/12174382/san-francisco-eviction-data-stanford

a. Home weatherization and other state and federal run programs (Discussed more in Section 2)

10 San Francisco ZIP codes with the highest **overall** Disconnection Rates, **2016-2018**	10 San Francisco ZIP codes with the highest **CARE** Disconnection Rates, **2016-2018**	10 San Francisco ZIP codes with the highest **overall** Disconnection Rates, **2019 - February 2020**
94124 - Bayview/Hunters Point - 9.37%	94124 - Bayview/Hunters Point - 44.73%	94124 - Bayview/Hunters Point - 7.8% (D9, D10)
94158 - Mission Bay - 6.89%	94134 - Visitacion Valley/Portola - 24.07%	94105 - SOMA/East Cut/Rincon Hill - 3.8% (D3, D6)
94132 - Merced Heights/Park Merced - 5.75%	94102 - Tenderloin/Civic Center/Hayes Valley -- 17.87	94102 - Tenderloin/Civic Center/Hayes Valley - 3.5% (D3, D5, D6, D8)
94103 - SOMA/Mid-Market - 4.90%	94112 - Crocker-Amazon/Sunnyside - 14.72%	94103 SOMA/Mid-Market - 3.4% (D3, D5, D6, D8, D9, D10)
94123 - Cow Hollow/Marina - 4.85%	94103 - Mission District/SOMA/Mid-Market - 13.47%	94134 - Visitacion Valley/Portola - 3.17% (D9, D10, D11)
94105 - SOMA/East Cut/Rincon Hill - 4.85%	94110 - Mission District/Bernal Heights - 11.13%	94132 - Merced Heights/Park Merced - 3.15% (D4, D7, D11)
94115 - Western Addition/Fillmore/Japantown/Lower Pacific Heights - 4.84%	94132 - Merced Heights/Park Merced - 9.84%	94115 - Western Addition/Fillmore/Japantown/Lower Pacific Height - 3% (D1, D2, D5)
94134 - Visitacion Valley/Portola - 4.78%	94115 - Western Addition/Fillmore/Japantown/Lower Pacific Height - 9.39%	94117 - Cole Valley/Panhandle/Lower Haight - 3%

		(D1, D5, D7, D8)
94133 - North Beach/Chinatown - 4.66%	94121 - Outer Richmond - 7.07%	94112 - Crocker-Amazon/Sunnyside - 2.8% (D7, D8, D9, D10, D11)
94109 - Tenderloin/Polk Gulch/Nob Hill - 4.65%	94108 - Chinatown/Union Square - 6.02%	94107 - SOMA/South Park- 2.7% (D6, D10)

(FIGURE F)[32]

ZIP CODE (Top 10 Disconnection Rates 2019 - February 2020)	**2018 Rate**	**2018 Avg Assistance**	**2019 Rate**	**2019 Avg Assistance**	**Jan - October 2020 Rate**	**Jan - October 2020 Avg Assistance**
94124 - Bayview/Hunters Point	9.30 %	$421	6.70%	$413.00	5.10%	$479.00
94105 - SOMA/East Cut/Rincon Hill	0.50 %	$253	0.40%	$233	0.40%	$289.77
94102 - Tenderloin/Civic Center/Hayes Valley	12%	$226	8%	$220	7.40%	$272
94103 SOMA/Mid-Market	6.30 %	$230	4%	$224	4%	$227
94134 - Visitacion Valley/Portola	2%	$335	3.30%	$349	2%	$410
94132 - Merced Heights/Park Merced	1.30%	$325	1%	$337	1.20%	$401
94115 - Western Addition/Fillmore /Japantown/Lower Pacific Height	3.40 %	$264	2.30%	$269	3.20%	$296

[32] Left and middle columns: See 1, right column:
https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M328/K292/328292340.PDF,
https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M345/K698/345698026.PDF

94117 - Cole Valley/Panhandle/ Lower Haight	1.30%	$281	1%	$276	0.80%	$318
94112 - Crocker-Amazon/Sunnysid e	1.20%	$400	0.10%	$400	0.80%	$491
94107 - SOMA/South Park	2.30 %	$228	2.50%	$219	2.50%	$269

*Avg rate was calculated using the 2016-2018 average for overall total accounts per zip code. There might be a margin of error if there was a significant change in total accounts in 2019 and 2020

(FIGURE G: LIHEAP 2018-October 2020 Average Assistance and Rate in Top 10 Disconnected Rate Zip Codes 2019-Feb 2020)[33]

Because there have been no disconnections since March 2020 due to the disconnection moratorium, CleanPowerSF has collected data on delinquency accounts ranging from 0-30 days, 31-60, and 61+ days. While CleanPowerSF's table does not break down delinquencies by zip code and specific zip codes are split across supervisors, supervisor districts with the highest rates of delinquent accounts (as of October 19, 2020), particularly with accounts older than 31 days, generally have a higher concentration of zip codes with the highest rates of disconnections from 2016 to February 2020 (general and CARE/FERA residents) within their jurisdiction.

	0-30 Days Overdue					
	Total Res Customers			CARE/FERA Res Customers		
Supervisory District	$ Amount Delinquent	Delinquent Customer Accts	Delinquency Rate	$ Amount Delinquent	Delinquent Customer Accts	Delinquency Rate
D1	$146,493	7,530	16%	$23,779	1,175	29%
D2	$122,677	6,890	17%	$8,780	465	30%
D3	$91,624	6,393	20%	$14,569	1,050	22%
D4	$278,124	9,711	40%	$50,523	1,700	41%
D5	$191,244	10,254	27%	$35,868	1,746	37%
D6	$127,751	9,677	22%	$35,623	2,147	30%
D7	$310,369	10,364	39%	$36,787	1,352	46%
D8	$387,967	17,049	42%	$22,536	1,080	36%
D9	$74,812	3,973	15%	$28,373	1,300	25%
D10	$90,868	4,372	17%	$45,417	1,882	25%
D11	$148,187	4,240	23%	$40,952	1,186	22%
Total	$1,970,114	90,453	26%	$343,206	15,083	30%
Average Delinquent $	$22			$23		

*CARE/FERA delinquency rate is calculated out of total CARE/FERA residents; not all residents

(Figure H)[34]

33 SFPES, via email 10/29/20

34 CleanPowerSF. Via email 11/10/20

	31-60 Days Overdue					
	Total Res Customers			CARE/FERA Res Customers		
Supervisory District	$ Amount Delinquent	Delinquent Customer Accts	Delinquency Rate	$ Amount Delinquent	Delinquent Customer Accts	Delinquency Rate
D1	$35,723	2,034	7%	$8,334	409	10%
D2	$39,663	2,575	6%	$4,404	237	15%
D3	$39,558	2,830	9%	$8,616	492	10%
D4	$39,354	1,567	7%	$11,058	383	9%
D5	$56,832	3,463	9%	$17,417	850	18%
D6	$68,854	4,561	10%	$21,188	1,125	15%
D7	$50,768	2,610	10%	$12,547	479	16%
D8	$46,063	2,817	7%	$7,543	411	14%
D9	$39,530	1,887	7%	$16,631	702	13%
D10	$47,231	1,779	7%	$16,840	584	8%
D11	$64,686	2,037	11%	$24,133	775	14%
Total	**$528,262**	**28,160**	**8%**	**$148,712**	**6,447**	**13%**
Average Delinquent $		**$19**			**$23**	

(Figure I)[35]

	>60 Days Overdue					
	Total Res Customers			CARE/FERA Res Customers		
Supervisory District	$ Amount Delinquent	Delinquent Customer Accts	Delinquency Rate	$ Amount Delinquent	Delinquent Customer Accts	Delinquency Rate
D1	$108,137	1,159	4%	$37,267	270	7%
D2	$122,829	1,602	4%	$23,734	177	12%
D3	$148,927	1,885	6%	$39,306	384	8%
D4	$127,361	909	4%	$46,658	264	6%
D5	$220,537	2,235	6%	$88,831	642	13%
D6	$254,794	3,295	8%	$82,394	863	12%
D7	$146,382	1,351	5%	$52,556	336	12%
D8	$159,489	1,779	4%	$44,956	375	12%
D9	$181,285	1,576	6%	$83,226	613	12%
D10	$402,530	2,748	10%	$272,077	1,609	21%
D11	$203,962	1,081	6%	$89,379	471	9%
Total	**$2,076,231**	**19,620**	**6%**	**$860,383**	**6,004**	**12%**
Average Delinquent $		**$106**			**$143**	

(Figure J)[36]

[35] See 26
[36] See 26

Using CleanPowerSF's tables, I consolidated columns for 1) total delinquencies over total accounts, 2) total delinquencies (31+ days)/total accounts (this may be a better indicator of who is struggling to pay their bills), and 3) of the total delinquencies, the proportion of CARE/FERA residents. (One recommendation for the future is for CleanPowerSF to provide their data using zip codes as PG&E submits disconnection data in this format. Another related suggestion is to ask the CPUC to require PG&E to publicly share disconnection and debt data at the census tract level rather than zip codes. It could provide a more specific picture of what areas *within* a zip code need more resources. I also matched the percent of zip codes in the top 10 highest disconnection rates from 2019 - February 2020 each respective district has jurisdiction over[37]:

Supervisor District	**Total Delinquencies/ Total Accounts**	**Total Delinquencies 31+/ Total Accounts**	**Total CARE or FERA Delinquencies /Total Delinquencies**	**% of Top 10 Highest Disconnection Rate Zip Codes 2019 - Feb 2020**
D1 (Elect Connie Chan)	27%	11%	17%	20% (94115, 94117)
D2 (Catherine Stefani)	27%	10%	8%	10% (94115)
D3 (Aaron Peskin)	35%	15%	17%	30% (94105, 94102, 94103)
D4 (Gordon Mar)	51%	11%	19%	10% (94132)
D5 (Dean Preston)	42%	15%	20%	30% (94102, 94103, 94115)
D6 (Matt Haney)	40%	18%	24%	40% (94105, 94102, 94103, 94107)
D7 (Elect Myrna Melgar)	54%	15%	15%	30% (94132, 94117, 94112)
D8 (Rafael Mandelman)	53%	11%	9%	30% (94102, 94103, 94117)
D9 (Hillary Ronen)	28%	13%	35%	30% (94124, 94103, 94112)
D10 (Shamann Walton)	34%	17%	46%	50% (94124, 94103, 94134, 94112, 94107)
D11 (Aasha Safai)	40%	17%	33%	30% (94102, 94134, 94132, 94112)

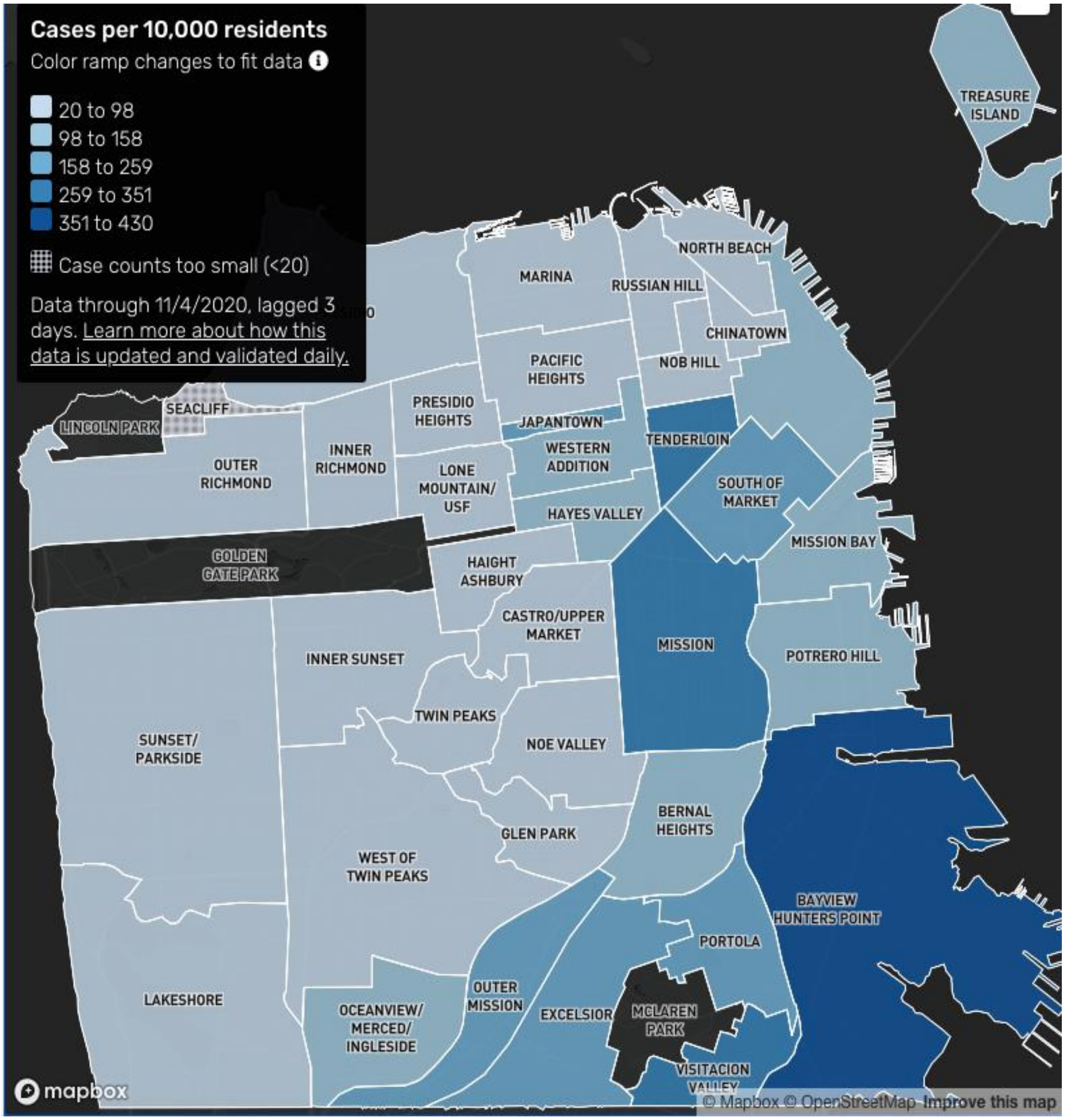
(Figure K: Synthesis of Figures: H,I,J)

[37] https://data.sfgov.org/widgets/pjwd-njm9

What story does the data tell? Supervisor districts with at least 15% of total accounts with delinquencies more than 30 days old, at least 15% of total delinquent accounts are CARE/FERA residents, and at least 30% of the top ten disconnected zip codes before the pandemic are in bold. D10 and D6 have the highest and an almost identical rate of delinquent accounts 31+ days plus the highest proportions of zip codes disconnected before the pandemic. Yet, in D10, half of the delinquencies are CARE/FERA residents, and for D6, a fourth of delinquencies are CARE/FERA residents.

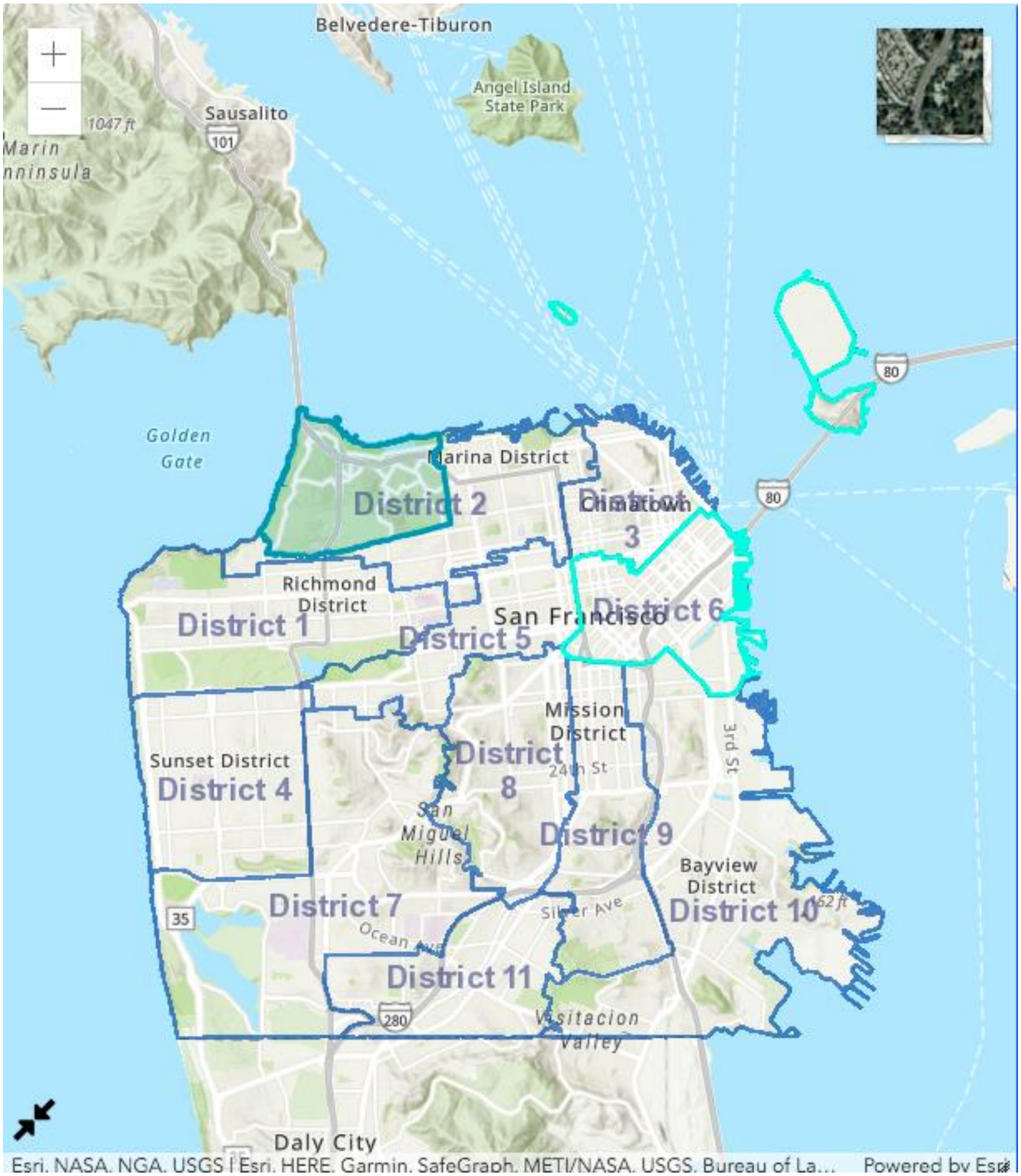
Does this signify that perhaps in D10, the CARE/FERA discount is insufficient, and in D6, either not enough people know of CARE/FERA or that people are ineligible for the discount but cannot afford their bill? Overall, it's concerning that throughout the entire City, the overall delinquent accounts range from 27% to 54%, and delinquent accounts older than thirty days across districts ranges from 10% to 18%.

COVID-19 San Francisco Case and Death Rate by Neighborhood



(FIGURE L)[38]

[38] https://data.sfgov.org/stories/s/Map-of-Cumulative-Cases/adm5-wq8i#cumulative-cases-map



(FIGURE M: SF Supervisor District Map)[39]

[39] https://sfplanninggis.org/pim/map.html?layers=Supervisor%20Districts

Neighborhood COVID-19 Data

Neighborhood	Resident Population	Cases	Rate of Cases (per 10,000 residents)	Deaths
Bayview Hunters Point	37,394	1605	429.21	14
Tenderloin	29,588	1036	350.14	10
Mission	59,639	1819	305.00	Less than 10
Visitacion Valley	19,005	535	281.50	Less than 10
Excelsior	40,701	1053	258.72	Less than 10
Japantown	3,532	85	240.66	12
Outer Mission	24,853	575	231.36	Less than 10
Portola	16,563	361	217.96	Less than 10
South of Market	21,771	414	190.16	Less than 10
Bernal Heights	25,858	407	157.40	Less than 10
Western Addition	22,638	340	150.19	Less than 10
Oceanview/Merced/Ingleside	28,217	423	149.91	Less than 10
Treasure Island	3,064	43	140.34	0
Potrero Hill	14,209	198	139.35	Less than 10
Mission Bay	12,180	163	133.83	0

(FIGURE N)[40]

The top 10 COVID-19 case rate neighborhoods, from highest to lowest, are Bayview Hunters Point, Tenderloin, Mission, Visitacion Valley, Excelsior, Japantown, Outer Mission, Portola, South of Market (SOMA), and Bernal Heights. Sixty percent of these neighborhoods correlate with the neighborhoods within the top 10 disconnection rate zip codes from 2019 to the onset of COVID-19 moratorium: Bayview Hunters Point, Tenderloin, SOMA, Visitacion Valley, Portola, and Japantown. The highest COVID-19 case rates are in District 10, 11, 9, 6, 5, and 3). These districts also correlate with the highest delinquent account rates in October 2020.

Moreover, most of these zip codes have some of the highest proportions of Black (Bayview Hunters Point, SOMA), Latinx (Tenderloin, Visitacion Valley, Portola), and South East/East Asian (Portola, Visitacion Valley) households that are also low-income, rent-burdened, or single-parent.[41] As Parsons report also showed, there is a clear correlation among race, class, and power disconnections/residential delinquency accounts. Now there is a correlation between all of the above and higher COVID-19 case rates and deaths.

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[40] See 32

[41] See Appendices A - B

12-Month Payment Plan and Arrearage Management Plan (AMP)

CPUC's main new protection program to reduce disconnections is via the Arrearage Management Plan. To qualify:

1. A resident must be eligible for CARE and FERA
    a. As previously discussed, the CARE/FERA eligible minimum income is significantly lower than what HUD classifies as "low-income," "very low-income," and for households with 1 to 3 people, even "extremely low-income in San Francisco.
2. The arrearage should be at least 90 days old.
3. A resident should have an arrearage (debt) of $500 or more.
    a. In a non-pandemic/moratorium reality, what is the proportion of households that would be eligible?
        i. Before the pandemic/moratorium, residents were expected to pay their arrearage within two months of missing the first payment or agree to complete a three-month payment plan for PG&E not to disconnect their power.
        ii. What is the proportion of disconnected residents from 2019 to the beginning of the pandemic who would have been eligible for the AMP?
            1. Based on SFPES LIHEAP data from 2018 to October 2020, 91% (18,873/20,627)[42] of households applying for LIHEAP utility assistance had an arrearage of less than $500 and would have been ineligible for AMP, and only 9% were eligible. While this is only data from LIHEAP eligible residents, it could be reasonable to assume the arrearage of only CARE/FERA eligible residents would be similar.
        iii. After the moratorium's scheduled rescinding in April 2021, a much more significant proportion than 9% of residents may be eligible after accruing arrearage debt greater than $500 during the moratorium on disconnections.
        iv. For residents with an arrearage of less than $500, PG&E is required to provide a resident with a 12-month payment plan where they are to pay off their debt during that period and pay their month to month bill.

[42] See 27

4. A resident does not need to receive a disconnection notice from PG&E to qualify.

    a. If an eligible resident calls PG&E, PG&E is required to notify them of the program.

    b. PG&E is required to offer a resident who qualifies for an AMP before they disconnect them to enroll in the program.

5. Once PG&E enrolls a resident in the AMP, it is required to forgive 1/12 every month of the total debt a resident has upon entering an AMP agreement for the following twelve months.

6. A resident is required to make on-time payments for the following 12 months upon entering an AMP agreement, and after the 12 months, PG&E is required to eliminate all debt a resident has accrued up to $8000.

7. A resident is allowed a maximum of two missed monthly payments that are non-sequential. If the resident pays in full a missed month's charge by or on the following month's billing date in addition to the current month's bill, PG&E cannot push a resident out of the program.

    a. CPUC uses the example "a resident can miss a payment in March and make it up in April but cannot miss March and April's payment and make both up in May." If a resident misses two sequential monthly payments, PG&E can break the agreement. If a resident misses three non-sequential payments, PG&E can break the deal.

    b. For example, if PG&E breaks an AMP agreement with a resident six months into the program, the debt is forgiven up until the point PG&E breaks the agreement, and past debt will not be reinstated.

        i. Therefore, a resident is responsible for paying off their remaining arrearage within two billing cycles, or PG&E can cut off their power.

8. AMP participants who PG&E breaks an agreement with can re-enroll in the program after waiting 12 months and meeting all other eligibility requirements.

9. CARE/FERA residents who complete the AMP program can re-apply for the program after a year and meet all other requirements.

Concerns on 12-month Payment Plan and AMP

PG&E typically only provided three-month payment plan options for residents with an arrearage. Now, PG&E is required to offer a 12-month payment plan for residents with less than

$500 in arrearage. While this should have a positive impact in helping a resident pay off their debt over a more extended period, it does not address the main problem of a resident not being able to initially afford their month to month bill, especially now in the context of a global health crisis.

Given that public health experts strongly predict[43] the pandemic and its negative economic impact will extend past April 2021, and if California does not extend the moratorium past April 2021, this begs the following question: *How can a resident be expected to pay their monthly bill on time for the next twelve months, while the pandemic continues with an undefined ending, if the main reason why they have an arrearage is that they did not have the economic means to pay most likely related to losing financial stability because of COVID-19, which again, is still on-going?*

Even if the pandemic *does* end in April 2021, and the landscape of economic security reverts to the pre-pandemic era (which is the very landscape for why SB 598 passed initially and CPUC was required by CA law to create decisions to reduce disconnections), the 12-month payment plan and AMP would still most likely be insufficient in alleviating the majority of SF residents who PG&E disconnects. That's because most people are very unlikely to accrue a $500 arrearage without either PG&E disconnecting them first or PG&E offering a 12-month payment non-AMP plan where a resident will be expected to pay off their debt in addition to paying their monthly bill on time. Furthermore, CPUC does rule that a resident can miss two non-sequential payments if on AMP without disqualification. Still, it does not specify any forgiveness requirements if the resident on a 12-month non-AMP plan misses a payment. This may mean PG&E can disconnect a resident who misses either a monthly bill or debt payment just once.

Furthermore, PG&E can charge reinstatement late fees for missing a payment, further increasing the possibility of breaking a 12-month agreement or AMP plan. Another interesting point of consideration is that Sandoval from TURN stated that a resident, if unable to pay the entirety of their bill, will not even pay the portion of the bill they can afford because they are still subject to disconnection within two months for not paying the entire bill. This point could be evidence of why an effective low-income assistance program is through a percentage of income plan.

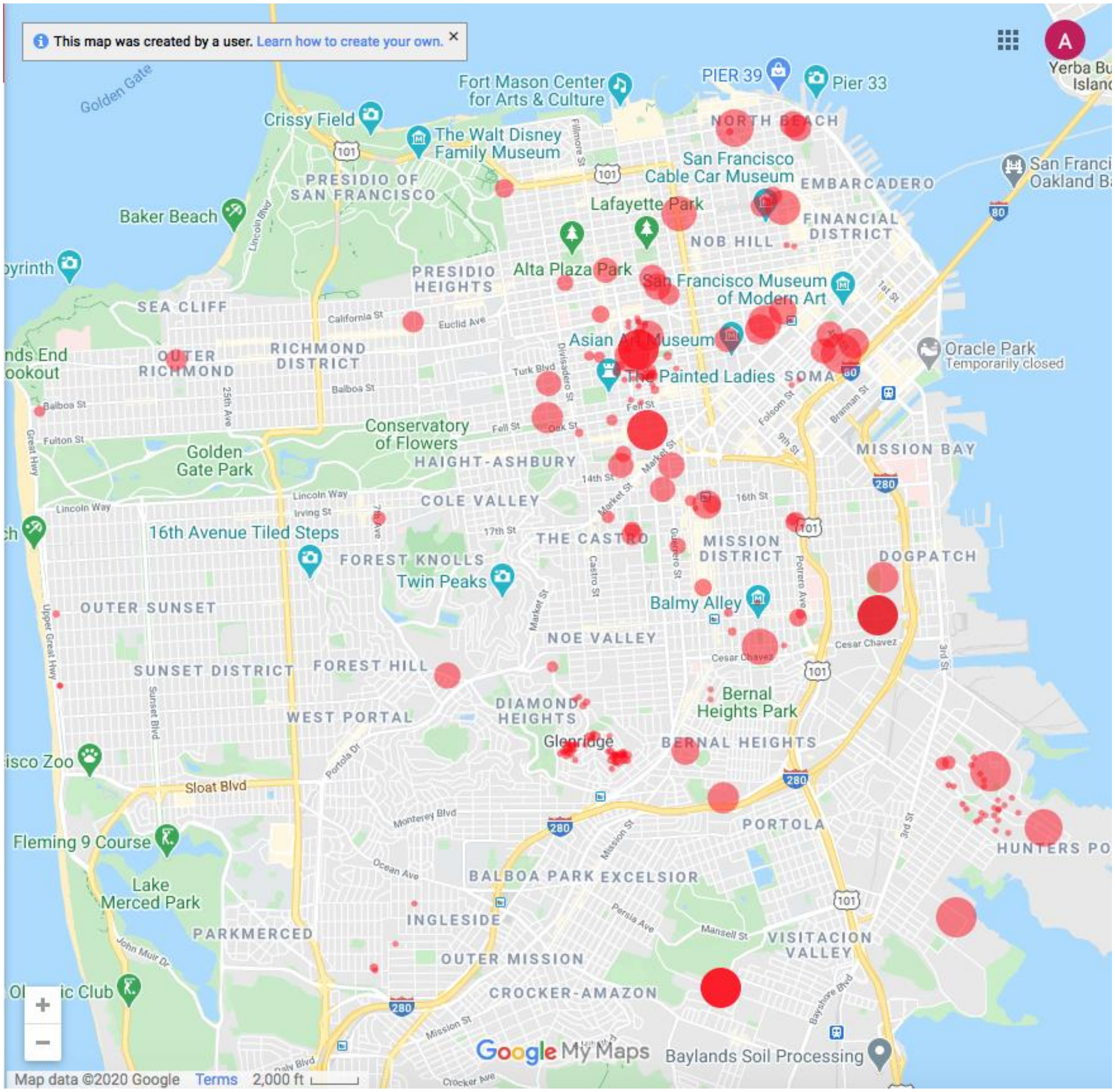
The economic volatility of post-moratorium or post-pandemic San Francisco renders the 12-month program and AMP program greatly missing the mark in protecting San Francisco residents, especially in the time of COVID-19. This program may be beneficial in other parts of California. Still, it will most likely do little to help San Francisco residents as one has to keep up with paying 1) a month to month bill and 2) the debt if on a non-AMP 12-month plan or 3) if they are eligible for debt forgiveness through AMP, they must be eligible for CARE/FERA (again, the disparity in who is classified as low-income in San Francisco and who is eligible for CARE/FERA is approximately $50,000).

[43] https://thehill.com/changing-america/well-being/prevention-cures/517095-fauci-reveals-when-he-thinks-the-us-can-return

The 12-month plan or AMP can very well be incredibly beneficial for a resident who does secure financial stability during or immediately after the moratorium to afford their utility bill and debt on a reliable basis for a consecutive twelve months. But given the significant unpredictability of the timeline of the pandemic, the moratorium is still scheduled to end in April 2021.

The volatility of economic security and uncertainty over how the epidemic will change the nature of jobs in conjunction with CPUC failing to require PG&E to increase discounts or expand income eligibility within low-income assistance programs, especially during a pandemic, will most likely render vulnerable San Francisco residents to disconnection crises during COVID-19.

2. Decision on Subsidized Housing (Section 8) Residents



(Figure N: “SF HUD and Housing Projects”)[44]

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44 https://www.google.com/maps/d/u/0/viewer?ie=UTF8&oe=UTF8&msa=0&mid=19tet6pnpvH2mpNuUhaMsWH8NimE&ll=37.80435368066478%2C-122.454380545166&z=12

Top 10 Zip Code 2019-Feb 2020 Disconnection Rate	Percentage of Total Section 8 Units in SF
94124- Bayview/Hunters Point - 7.8%	9.40%
94105 - SOMA/East Cut/Rincon Hill - 3.8%	0%
94102 - Tenderloin/Civic Center/Hayes Valley - 3.5%	14%
94103 - SOMA/Mid-Market - 3.4%	5%
94134 - Visitacion Valley/Portola - 3.17%	8.40%
94132 -Merced Heights/Park Merced - 3.15%	0.20%
94115 -Western Addition/Fillmore/Japantown/Lower Pacific Height - 3%	15%
94117 - Cole Valley/Panhandle/Lower Haight - 3%	2.60%
94112 - Crocker-Amazon/Sunnyside - 2.8%	0.05%
94107 - SOMA/South Park - 2.7%	11.30%
Total %	**70%**

(Figure O: SF HUD and Housing Projects Table Breakdown)[45]

CPUC does not require PG&E to provide additional disconnection protections for those living in government-subsidized housing, like Section 8. PG&E is only required to offer a 12-month payment plan that is open to all residents. Again, a resident is required to pay off their debt within 12-months and keep up with their month-to-month bill. This is incredibly concerning as Sandoval from TURN has stated that a resident can be evicted for failing to pay a

[45] See 39

utility bill just *one time*[46]. This should also be the responsibility of HUD and MOHCD to work to end evictions because of utility debt. Moreover, a person who is in transitional housing or currently houseless may be ineligible to move into a subsidized affordable housing unit if they owe a debt to PG&E. CPUC claims it would be "unfair" to provide an additional layer of protection including only residents in Section 8 housing and not other low-income residents. CPUC ignores utility advocates' statements that a person in subsidized housing will be evicted for missing a payment. A low-income person in non-subsidized housing will not be evicted for not paying a utility bill just once. This is a cyclical relationship between utility debt and houselessness, and the CPUC fails to provide any protection.

The map shows SF HUD data on where Section 8 housing is in the City. Note that 70% of Section 8 housing exists within districts with the ten disconnection rate zip codes.

What percentage of disconnections in 2019 to March 2020 were of residents in Section 8 housing? Who currently in Section 8 housing has a delinquent account? CleanPowerSF should know who is in Section 8 housing to ensure people can keep up with their payments or not. Moreover, the map provides each unit's address. Therefore, CleanPowerSF should be able to identify residents with delinquent accounts at each Section 8 housing site without undue administrative burden.

CleanPowerSF should track residents with debt residing in these units and then connect them to LIHEAP/CARE/FERA for bill and debt management. However, where assistance programming falls short, CleanPowerSF should fund the remaining debt when California rescinds its disconnection moratorium, whether that it is in April 2021 or extended. While California does have a temporary eviction moratorium until January 31, 2020, it is unclear if this protects residents in Section 8 housing[47].

3. Decision on Limiting Zip Code Disconnection Rate

PG&E is required never to exceed an *overall* disconnection rate of 30% in any zip code. This rule may be beneficial to other cities and counties in California; however, it is irrelevant to San Francisco. No zip code is remotely close to a 30% overall disconnection rate. Bayview Hunters Point has had the highest disconnection rate in the City, and in 2019, its rate did not exceed 9%. CPUC should have ruled that PG&E cannot exceed a 30% disconnection rate for CARE/FERA residents. This would have impacted the City as Parsons data also signified multiple zip codes, like Bayview Hunters Point, with CARE/FERA disconnection rates exceeding 30%. CleanPowerSF and the SFPUC should annually review this data in partnership with the CPUC.

4. Decision on Reconnection Goals

[46] http://www.turn.org/wp-content/uploads/2018/05/2018_TURN_Shut-Off-Report_FINAL.pdf
[47] See 17

CPUC urges PG&E to meet a reconnection goal. CPUC recommends that electrical IOUs achieve a 90% reconnection rate within the same day and that gas utilities should also attempt to achieve a 90% reconnection goal within 24 hours. Ultimately, this is a recommendation and not a mandate, so it is unclear how this will positively impact San Francisco residents.

5. Decision on Establishment & Reestablishment Deposits

CPUC requires PG&E to eliminate all deposits and redeposits. A new resident does not have to pay a fee for service, nor does a previously disconnected resident pay a fee for reconnection. This applies to all residents, regardless of income. This should help low-income residents vulnerable to disconnections, especially multiple disconnections, as reestablishment deposit fees are a barrier to reconnection. TURN reports that shutoffs are a "hidden driver of housing displacement: and that "1 out of every 10 customers who have their electricity shut off is never reconnected."[48]

6. Decision on Final Notices

When PG&E issues a final notice regarding impending disconnection to a resident, it should indicate on the disconnection notice the availability of programs like CARE, FERA, and LIHEAP as well as email the resident who has agreed to prior email communication. There is no clear mandate that PG&E is required to communicate with a resident who is not an English speaker regarding final notices.

7. Decision on Multi-Language Communications

The only requirement PG&E is to follow regarding providing outreach in languages other than English is for providing materials in "multiple languages" for county health workers in regard to the medical baseline program. For every other point of communication, CPUC "recommends" [read: not obligated] PG&E to provide outreach in other languages. It is unclear what the scope of language barriers has contributed to preventing access to low-income assistance in SF. CleanPowerSF should consider bridging this gap as a role in its staffing if it has not already.

8. Decision on LIHEAP Improvements

CPUC will require PG&E to provide an online pledging portal for LIHEAP Local Service Providers within its jurisdiction, like SFPES, to create a stream of communication through databases to prevent disconnections for people process of receiving LIHEAP assistance. An overall positive addition in preventing people who are already in the process of receiving LIHEAP funding not to face disconnection. Suarez from SFPES has confirmed PG&E is in the process of working with SFPES to create an online portal.

9. Decision on Medical Baseline Program

[48] http://www.turn.org/wp-content/uploads/2018/05/2018_TURN_Shut-Off-Report_FINAL.pdf

This CPUC program "is an assistance program for residential customers who have special energy needs due to qualifying medical conditions. It is based solely on medical conditions, and there is no income requirement. The program provides a lower rate on your monthly energy bill and extra notifications in advance of a utility Public Safety Power Shut-Off (PSPS)."[49] PG&E is required to implement a system that allows doctors and physician's assistants, and nurse practitioners to certify that a resident is eligible for the medical baseline program. Advocates argued that only allowing those with MDs certifying power created barriers for residents who needed medical baseline protection to survive. Given an expensive American healthcare system and that we are also currently in the COVID-19 pandemic, the CPUC should have expanded baseline eligibility certification power to include social workers. Public utility access advocates urged CPUC to consider this approach, but the CPUC rejected it. Once a resident is part of the program, PG&E is prohibited from disconnecting them. PG&E is required to provide annual training for county health service workers that do home visits and to provide regular outreach and educational materials for field workers.

SB 598 requires no disconnections for medical baseline residents. Hopefully, the expansion of who can certify a resident's eligibility for the program will help more residents afford their bill. Most importantly, the protection of being on the program keeps them connected to power and alive. The other issue is that there needs to be a back-up source in the case of power outages, like solar + storage (discussed more in Section 2).[50]

10. Decision on Transparency for Community Choice Aggregation (CCA)

PG&E is required to provide automatic notification to CleanPowerSF when a resident receives a 15-day notice, 48-hour notice, and is reconnected. PG&E should also provide on-going notice on disconnections without CleanPowerSF having to submit a formal data request.

11. Decision on Vulnerable Population (65+ and Under 12 Months)

PG&E is not required to provide separate protections for 65+ residents or households with children under a year old. This protection was part of an interim decision that CPUC would not continue due to PG&E claiming it was an administrative burden due to seeking and storing resident data.

This is concerning as seniors typically have lower median incomes, and that new parents may not be able to work and find childcare during the pandemic. The main argument for why CPUC decided not to require separate protections is its administrative burden in checking on residents to verify and validate. One way to alleviate the burden is to develop a better low-income assistance programming that allows these populations to be protected without specific

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49 https://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/News_Room/Fact_Sheets/English/MedicalBaseline0113.pdf

50 https://naacp.org/wp-content/uploads/2020/07/Lights-Out-in-the-Cold_NAACP-ECJP-4.pdf

protections for them. At a minimum, through urging CPUC or the state legislature, another is to require PG&E to upkeep the administrative work for the pandemic duration.

12. Decision on Percentage of Income Percent Plans (PIPP)

CPUC is currently undergoing the development of a pilot PIPP program for particular low-income residents. The intent is that a levelized bill may prevent residents from accumulating arrears and reduce disconnections. This plan is undoubtedly promising; however, the pilot program is intended only for the top ten zip codes with the highest frequent disconnections in each IOU's service territory. Based on PG&E's 2019 disconnection data[51], none of the zip codes in San Francisco are eligible for the pilot program.
Can SFPUC inquire to CPUC if there are plans, after the pilot program results, to scale to include San Francisco? Regardless, this pilot study will not benefit San Francisco in terms of COVID-19 relief and the upcoming two years.

Case Study: Los Angeles Utility Debt Forgiveness[52]

More than thirty community, labor, and environmental justice organizations (RePower LA Coalition[53]) urged the Los Angeles Department of Water and Power (LADWP) to develop a protection plan for low-income residents when California lifts the April 2021 moratorium in October 2020. The campaign organized their members to show up at LA City Council meetings and the Los Angeles Department of Water and Power (LADWP) Commissioners meetings. They successfully pushed LA City Council to pass a motion[54] requiring LADWP to report back to the Council with a utility debt relief plan for low-income residents. The motion also instituted a percentage of monthly income plan in the making up for where current low-income assistance programming falls short.

LA successfully secured $694 million from the CARES (Coronavirus Aid, Relief, and Economic Security) Act from the federal government. The RePower campaign successfully secured $50 million from the total relief specifically for LADWP resident bill relief. The program's operation is that low-income residents apply to a lottery, and those who are randomly selected will receive a $500 check for their debt.

Unfortunately, San Francisco only secured a total of 48 million in CARES funding[55] ($5.5 million for the first round, $45.3 million for the second). The City allocated none of the funding towards public utility relief. However, San Francisco's population is almost 882,000, while LA's is nearly 4 million. This amounts to approximately $55/person in San Francisco and $174/person in LA. It is unclear why there is a considerable disparity between the award per capita for San Francisco and LA.

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[51] https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M328/K292/328292340.PDF
[52] https://www.nrdc.org/experts/michele-knab-hasson/angeles-leads-easing-consumer-utility-debt
[53] https://laane.org/blog/campaigns/energy-and-water/
[54] See 4
[55] https://sf.gov/information/provide-comments-proposed-uses-cares-act-esg-funding#:~:text=The%20amount%20of%20the%20second,of%20CARES%20Act%20ESG%20funding.

RECOMMENDATIONS (See pgs. 2-4 for citations)

Short-term: Eliminate debt accrual and expand low-income assistance programming and coverage to prevent post-moratorium disconnections:

1. The SFPUC should strongly urge the CPUC in its rulemaking process to extend the April 2021 disconnection moratorium to parallel the entire duration of the COVID-19 pandemic. It should build support for this request with other community choice energy providers in California and the California Advocates for Community Choice (CalCCA) in California.

    a. SFPUC and CleanPowerSF should have a plan for April 2021 to prevent disconnections.

2. Suppose the CPUC fails to act to extend the disconnection moratorium. In that case, the SFPUC should consider urging the Governor's Office and state legislators to extend the moratorium through executive order or statewide legislation.

3. The Board of Supervisors (BOARD OF SUPERVISORS) should pass a Resolution calling on the CPUC to extend the disconnection moratorium for the duration of the COVID-19 pandemic, specifically SF and CA's state of emergency declaration, and urge the agency to consider other measures to forgive the debt, and lessen the overall financial burden of low-income utility residents.

4. If the CPUC's rulemaking process fails to require more transparency from PG&E on how the company calculates the Power Charge Indifference Adjustment (PCIA) charge, the SFPUC, and the City should pursue state legislation that compels the utility to shed light on these fees. *CleanPowerSF stated during LAFCo's October 2020 meeting, "customers pay PG&E approximately $101 million per year through the PCIA charge on their bills...and this is expected to increase in 2021." Approximately $4,574,607 of this charge could instead go to eliminating the total utility bill debt SF residents owe as of October 2020. Many more millions could go towards expanding low-income assistance programs or reducing SF's emissions impacts at a faster pace.*

5. The Board of Supervisors (BOARD OF SUPERVISORS) should pursue all local, state, and federal funding sources to eliminate all debt from delinquent accounts for low-income residents as soon as the disconnection moratorium ends.

    a. LA passed a motion to require its public utility commission to report back with a debt relief and forgiveness program for low-income residents.

        i. LA allocated $50 million from their $694 million from CARES
        ii. If the SFPUC is not already planning to do so, Board of Supervisors should consider following suit.

b. SF received $48 million in CARES funding but none went to utility assistance efforts.

   i. If there is another round of CARES funding, ensure adequate funding goes to public utility low-income assistance.

c. Resolution 201196 (Supporting Low-Income Rate Assistance Power Program), referred for adoption during the November 2020 Board of Supervisors meeting, is a step in the right direction but insufficient because it is symbolic support. This resolution provides a strong basis for the Board of Supervisors to pass an ordinance requiring SFPUC to develop a plan (similar to LA City Council) to prevent disconnections, while strengthening outreach for existing programs and develop projects to reduce low-income customers' overall energy burden.

d. Urge the CA legislature to allow cities to implement income tax for high-income residents for the duration of the pandemic.

   i. Re-introduce previously successfully passed SF resolution supporting passage of (unsuccessful) CA legislation "to amend the Revenue and Taxation Code to enable San Francisco to levy personal and corporate income taxes."

   ii. Request CA bill sponsor Assemblymember Phil Ting to re-introduce state legislation.

6. SFPUC and CleanPowerSF should urge CPUC to revise CARE/FERA income eligibility guidelines by revoking the "one size" fits all standard across the state and implementing county or regional standards using Housing and Urban Development's (HUD) metropolitan average median income (AMI) as a basis

7. CleanPowerSF (CleanPowerSF) should provide additional funding assistance to CARE/FERA residents and residents who are classified as low-income by SF standards but ineligible for CARE/FERA/LIHEAP for assistance with monthly bills.

   a. Create a campaign: The COVID-19 Public Utility Relief Fund

      i. Ask residential and commercial participants to donate a percentage of their monthly bill (example: 1% of the total bill). Use similar framing as the "SuperGreen" program.

      ii. Reach out to specific potential individual donors or foundations

   b. Implement the percentage of monthly income plan, use low-income standards following the SF cost of living for eligibility

    i. The same LA motion includes this plan

8. CleanPowerSF should identify funding to forgive all debt resulting from Section 8 residents' delinquencies to prevent eviction after the disconnection moratorium.

    a. CleanPowerSF or Board of Supervisors can urge SF Housing & Development (HUD) and the Mayor's Office of Housing and Development (MOHCD) to retract eviction guidelines for failing to pay utility bills.

9. Based on LAFCO's September and October 2020 meetings, it is unclear what CleanPowerSF's racial equity plan is (including specific, measurable outcomes) and what relationships they have built with community-based organizations (Board of Supervisors) to find hard-to-reach vulnerable populations thus far. SFPES states it has established relationships with CBO's in the top disconnected zip codes and could partner with CleanPowerSF in these efforts.

    a. CleanPowerSF should hire a "Community Equity Specialist," like MCE, and work with Local and Regional Government Alliance on Race & Equity (GARE) to come up with a Racial Equity Plan framework that involves communities with the highest disconnection rates in CleanPowerSF decision-making processes.

        i. MCE's Community Equity Specialist, Justin Marquez, "serves as a liaison to key stakeholders including local government partners, businesses and community advocates, connecting residents to MCE services and programs," which means establishing relationships with Board of Supervisors to center low-income residents and communities in decision-making processes and program development.

            1. This person can guide and build relationships with CBO's and develop a coalition similar to MCE's Community Power Coalition.

            2. Marquez recommends GARE in developing an environmental justice plan.

    b. Assessing CleanPowerSF's staff structure, CleanPowerSF should seriously consider making their leadership structure diverse, as there are no people of color in the highest positions of power. Moreover, leadership positions should include people of color from the communities that suffer the highest disconnection rates and have been impacted the most by COVID-19, historical disenfranchisement, and environmental injustice due to living close to PG&E's power plants[56], for example, Bayview Hunters Point.

[56] See 1

Section 2: Energy Efficiency, Affordable Utilities, and Power Emergencies

Energy Efficiency Programming

Section 1's purpose was to relay what protections California will provide and, based on its limitations, what San Francisco should do to protect its residents on a short-term scale in light of COVID-19.

This section is to relay what the City can do on a longer-term basis to expand access to energy efficiency programming as homes that are energy efficient and use more renewable energy have significantly lower bills[57].

SFPES, in addition to providing low-income bill assistance, has a home weatherization program[58] where "special priority is given to households with an emergency, applications that are disabled, senior citizens, and households with children. Homeowners and renters, including those who occupy mobile homes, may apply."[59] A limitation and requirement is that 66% of the units within a multi-unit building should be eligible for LIHEAP for that building to be weatherized plus approval of the developer or landlord of that unit. To reiterate, LIHEAP eligibility uses a federal poverty scale and requires an even lower income threshold than CARE/FERA. Below is a table of LIHEAP home weatherization projects from 2013 - 2019 breakdown across the top 10 disconnection rate zip codes.

Top 10 Disconnection Rate Zip Code (2019-Feb 2020)	2013	2014	2015	2016	2017	2018	2019
94124- Bayview/Hunters Point	0	45	67	189	51	13 (SiF)	9 (SiF)
94105 - SOMA/East Cut/Rincon Hill	0	0	0	0	0	0	0
94102 - Tenderloin/Civic Center/Hayes Valley	0	0	185	136	0	0	1 (SiF)
94103 - SOMA/Mid-Market	0	0	14	0	0	0	0
94134 - Visitacion Valley/Portola	41	0	2 (SiF)	0	0	4 (SiF)	2 (SiF)
94132 -Merced Heights/Park Merced	0	0	0	0	0	0	0
94115 -Western Addition/Fillmore/Japantown/Lower Pacific Height	0	0	0	0	0	0	0

57 https://rpsc.energy.gov/sites/default/files/publication/c-888_consumer_fact_sheet%20copy.pdf
58 See 18
59 See 16

94117 - Cole Valley/Panhandle/Lower Haight	0	0	0	0	0	0	0
94112 - Crocker-Amazon/Sunnyside	0	0	0	0	0	0	0
94107 - SOMA/South Park	0	0	0	0	0	0	0
94110 (#24) Mission District*	64	45	0	0	26	4 (SiF)	(SiF)

*SiF = "single-family home," if there were no multi-unit home projects

(Figure P: SFPES LIHEAP Multi-Unit Home Weatherization Projects 2013 - 2019)[60]

It is not completely clear what story this table is telling. The Mission District's 94110 zip code ranked #24 in disconnection rates but is in District 9, which has one of the highest delinquency rates in the City. The majority of the top disconnected zip codes have never had any SFPES LIHEAP projects. It is unclear if there are no eligible buildings, or a landlord/developer rejected the project, or for other reasons. Two questions are 1) What is the impact of home weatherization/energy efficiency projects in reducing debt and disconnections? 2) How will SFPES LIHEAP expand into the other most disconnected impacted zip codes?

Beyond SFPES, there are many low-income energy efficiency programs available, where funding is sourced either from the federal or state government. Moreover, different eligibility guidelines depend on the source of grants, type of unit, and income thresholds. CPUC offers the Disadvantaged Communities - Single-Family Homes (DAC-SASH), Disadvantaged Communities - Green-Tariff (DAC-GT), and Community Solar Green Tariff (CSGT) programs[61].

SF's Department of the Environment (ENV) increases residents' access to the Bay Area Regional Network Multi-Family Program (BAYREN)[62], an energy efficiency program similar to CPUC. Lowell Chu, Energy Program Director, noted that there are barriers for all eligible residents to know what programs they can benefit from because of the multitude of programs, with varying funding sources and income and home type eligibility. Chu suggests, as well as Parsons in 2019, that a staff position be created to run an "energy efficiency hub and help desk" where all CleanPowerSF customers can call. The staff member can answer all types of benefit programs available to a customer's situation, provide education on the process, dispel misconceptions of logistics and financing, and assist them with the application. MCE and East Bay Community Energy (EBCE) has a single point of contact[63] and could assist CleanPowerSF with establishing one for SF residents.

Chu reported that there is limited data on how energy efficiency programs impact an individual customer's bill and alleviate debt and disconnections. Because of customer data privacy, it is challenging to ascertain personal impact. What can CleanPowerSF do to gauge the

[60] See 27
[61] https://www.cpuc.ca.gov/SolarInDACs/
[62] https://www.bayren.org/multifamily
[63] *See 1*

effect of energy efficiency programming? One idea is to conduct resident surveys before and after energy efficiency programming, with customer consent. The Department of Environment could inform CleanPowerSF what buildings have received energy efficiency work, and CleanPowerSF can send residents at those buildings a survey about the changes in the bill and what their experience is living in an upgraded unit.

Lastly, there are issues with the implementation of home weatherization projects. Mara Blitzer, Director of Housing Development for Mayor's Office of Housing and Community Development (MOHCD), reports that there are issues with installing energy-efficient equipment without adequate infrastructure, "you cannot go solar if your roof is caving in." Moreover, funding for programs is restricted to energy-efficient equipment and not necessarily fixing a roof necessary to host solar panels. Is there a possibility for home weatherization programs funded by California to allot funding for home improvements that enable green grid infrastructure and programs? What is the impact of a lack of supportive housing infrastructure in preventing home weatherization projects?

Back-Up Power and Wildfires

Beyond COVID-19, California experiences massive wildfires resulting in thousands of people losing power across the state[64]. Due to precarious climate change, San Francisco is vulnerable to future power outages. What is the City doing to ensure emergency and renewable energy?

CleanPowerSF is currently spearheading a Virtual Power Plant (VPP) Pilot for multi-family homes to be launched in 2021 that should reduce energy supply costs and be used as a source of back-up power[65]. It is unclear if the VPP pilot will impact any of the top 10 highest disconnected rate zip codes. If not, CleanPowerSF should seriously consider implementing the pilot in only the top 10 zip codes.

Recent and new affordable housing projects administered by the Mayor's Office of Housing and Development (MOHCD) follow the California Green Building Standards Code (CALGreen), which Blitzer reports is "the highest energy efficiency building standard." However, there are no requirements for AHPs to have solar + storage. CleanPowerSF's Integrated Resource Plan (IRP) includes plans for implementing solar + storage projects in San Francisco[66]. Can CleanPowerSF let LAFCo know what places in the City will benefit from these specified projects? Can the Board of Supervisors pass an ordinance requiring the construction of renewable energy back-up sources and that all new emergency power sources be from 100% renewable energy? The Office of Capital Planning Resilience may better equipped to take on this task.

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[64] https://www.fire.ca.gov/incidents/2020/
[65] https://sfpuc.sharefile.com/share/view/s96af3238f1144eb9
[66] Memo to LAFCo from CleanPowerSF re CleanPowerSF's 2020 Integrated Resource Plan, 10/8/20

RECOMMENDATIONS (see pg. 4 for citations)

Longer-Term: Energy Efficiency and Renewable Back-Up Storage:

1. CleanPowerSF/SFPUC should create a staff position to serve as a centralized "energy hub information source knowledgeable about current energy efficiency low-income assistance programming. CleanPowerSF advertises this number to all its customers. This "energy hub information" could be part of San Francisco's 311, as this is the number an SF resident can call to inquire about non-emergency San Francisco (or 415-701-2311 for numbers with an area code other than 415).

2. CleanPowerSF's potential "Community Equity Specialist" position(s) can work on the expansion of equity efficiency programs.

3. CleanPowerSF should work with ENV to establish a partnership with MOHCD to expand solar + storage for new AHPs.

The main structure of how I interpreted the public utility crisis is, "What can San Francisco do in the absence of sufficient support from the state?"

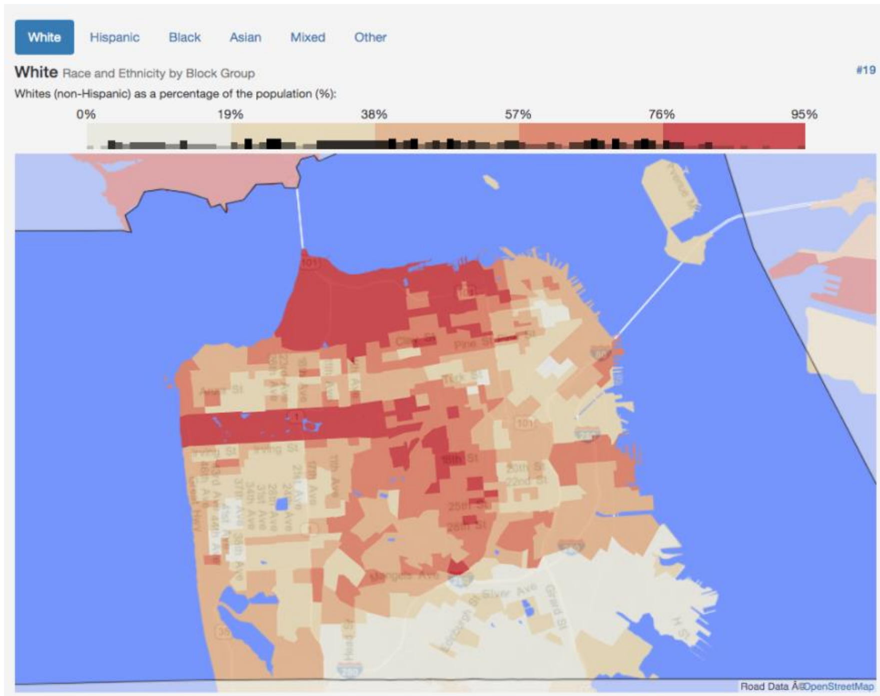
My main recommendations are ensuring no San Franciscan is subject to power disconnection once the state of California rescinds its disconnection moratorium during COVID-19 and that the City prioritizes funding to ensure this becomes a reality. Ultimately, utilities are a human right. CleanPowerSF should take measures during the moratorium to expand low-income assistance programming that is equitable with San Francisco's low-income standards and have a plan for making sure that once the disconnection moratorium ends, emergency funding is available to all residents with utility debt. San Francisco should not allow disconnections in general, but especially during a pandemic that has hurt low-income, working-class, people of color the most.

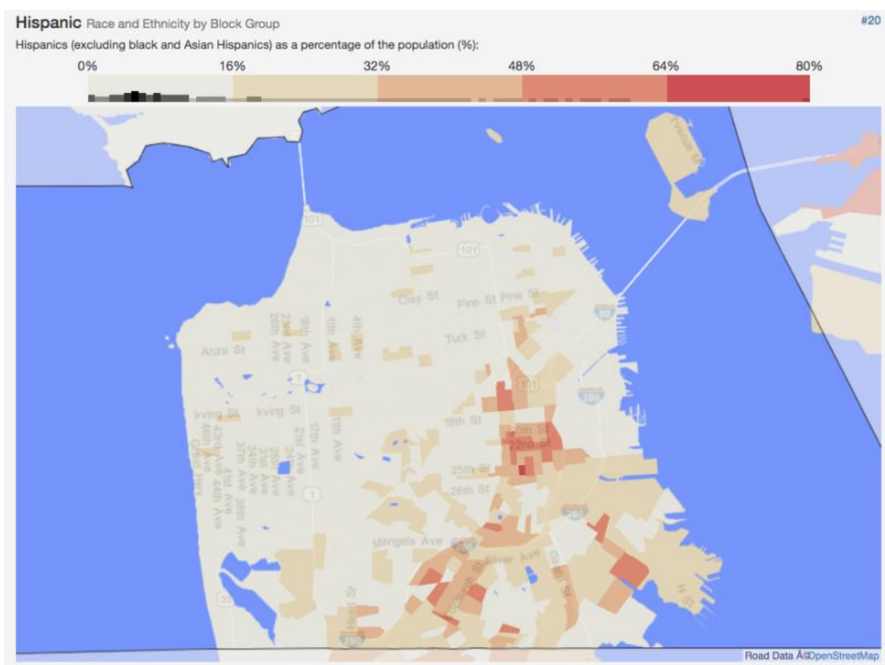
My other longer-term recommendations are for the City to make the process for low-income residents or landlords/developers of affordable housing applying for energy efficiency funding as accessible and straightforward as possible and expand renewable energy back-up sources. San Francisco has the power to end disconnections.

Power is a right.

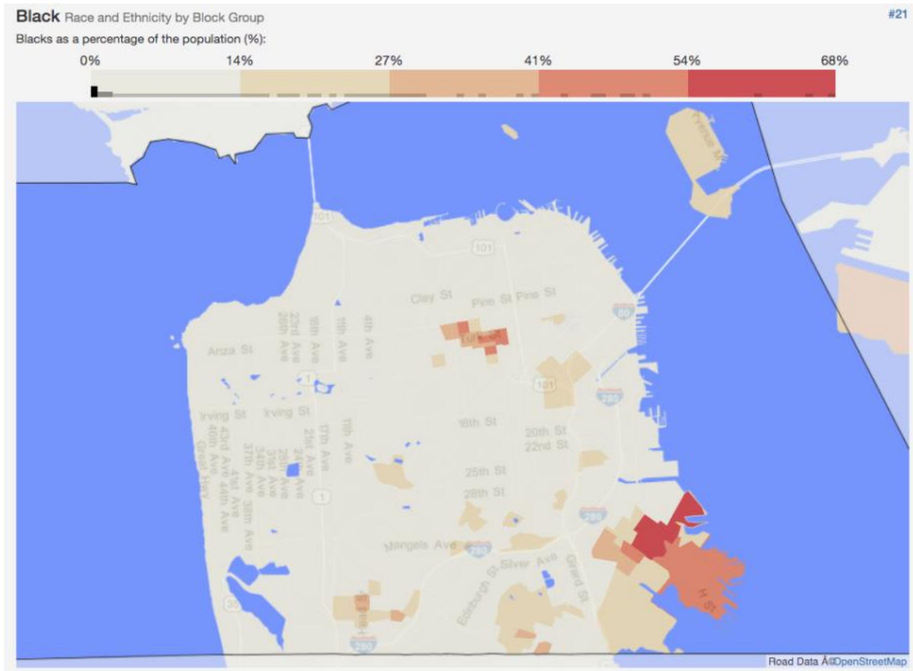
Appendices

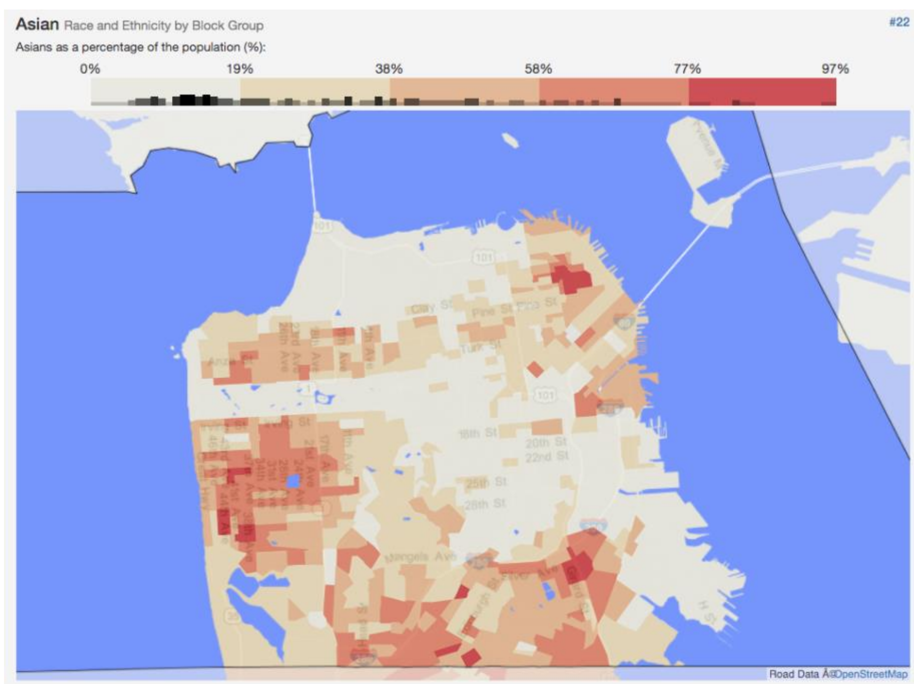
Appendix A[67]



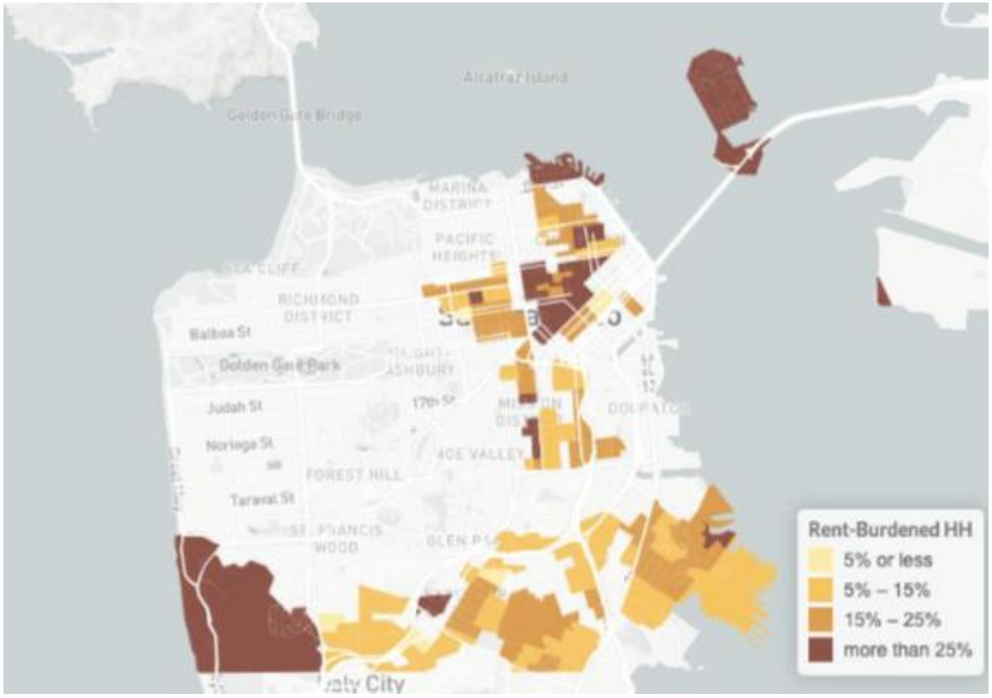


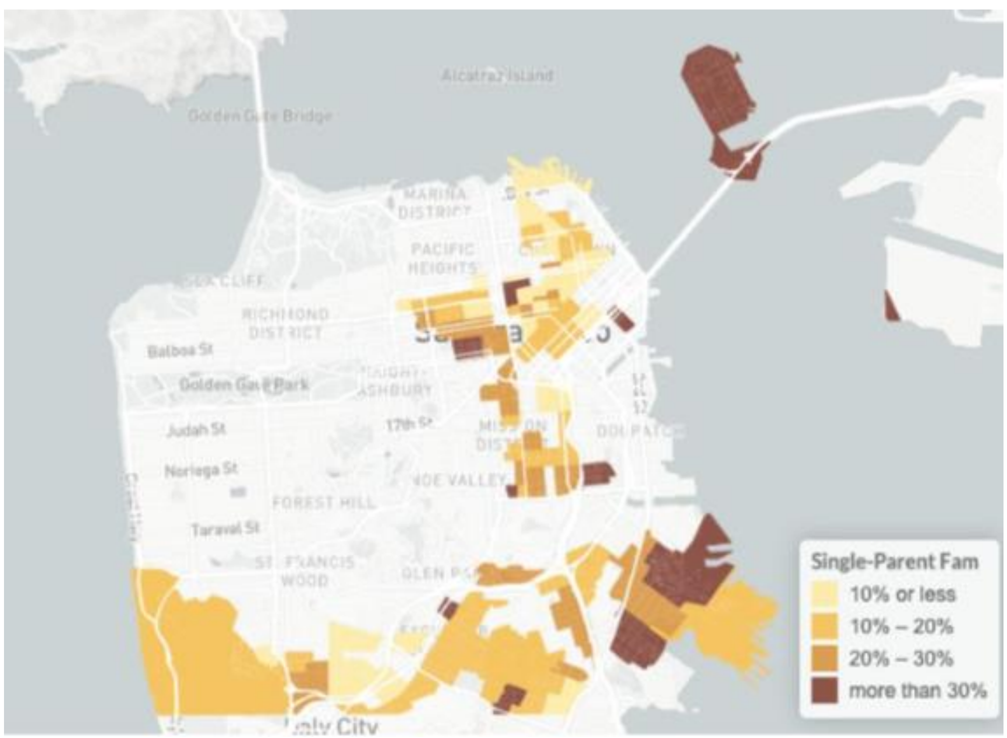
[67] https://statisticalatlas.com/place/California/San-Francisco/Race-and-Ethnicity


Black Race and Ethnicity by Block Group
#21
Blacks as a percentage of the population (%):
0%
14%
27%
41%
54%
68%
Road Data ©OpenStreetMap


Asian Race and Ethnicity by Block Group
#22
Asians as a percentage of the population (%):
0%
19%
38%
58%
77%
97%
Road Data ©OpenStreetMap

Appendix B[68]





[68] See 1 & https://coc-map.sfcta.org/