

Consumer Affairs Branch (CAB)

FIRST QUARTER REPORT – 2025

June 20, 2025

Services provided by CAB staff to consumers in Q1-2025



**California Public
Utilities Commission**

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About The Consumer Affairs Branch (CAB)

- CAB is dedicated to helping consumers who need support with their utility services.
- CAB is part of the External Affairs Division of the California Public Utilities Commission (CPUC).
- CAB provides the following services:
 - Resolves consumer questions or complaints about their regulated utility services (telecommunications, natural gas, electricity, and water). In this report, all consumer questions and complaints received by CAB are called **consumer contacts**.
 - Resolves application appeals for California LifeLine (a discounted phone program for low income and other eligible consumers¹).
 - Administers Limited English Proficiency (LEP) programs that assist consumers with telecommunications and energy issues.
 - Analyzes CAB consumer contact data to assist CPUC decision-makers, e.g., by supporting enforcement against fraud and abuse. CAB data analysts also keep the public informed about utility related issues that consumers are experiencing.

¹ <https://www.cpuc.ca.gov/consumer-support/financial-assistance-savings-and-discounts/lifeline>

About This Report

This quarterly report highlights the services provided by the California Public Utilities Commission's (CPUC) Consumer Affairs Branch (CAB) to consumers who have issues with utility services regulated by the CPUC. These utilities include telecommunications, electricity, natural gas, water, and transportation services.

Unless otherwise noted, the data presented in this report is based on inquiries and complaints received by CAB from January through March 2025.

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Q1-2025 Highlights

CAB Service Highlights Q1-2025

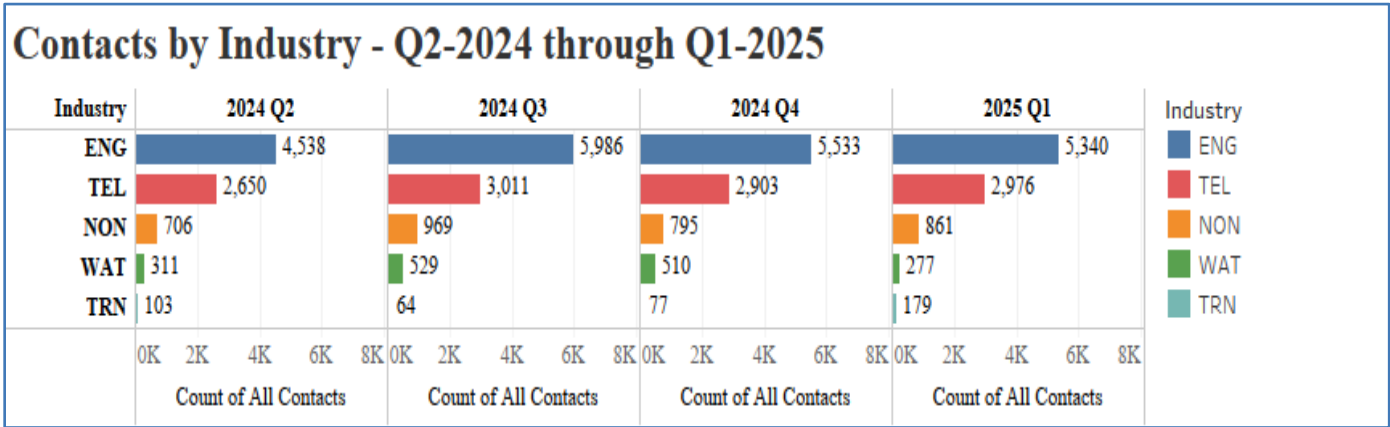
- CAB received 9,633 contacts from consumers seeking assistance.
- CAB assisted 2,288 consumers to resolve their complaints.
- CAB facilitated the return of \$458,104 to consumers from their utilities.

CAB Received 9,633 Consumer Contacts in Q1-2025

For this report, total consumer contacts include all questions and complaints received by CAB.²

Figure 1 displays the volume of consumer contacts (contacts) received by CAB across five industries – energy (ENG), non-jurisdictional³ (NON), telecommunications (TEL), transportation (TRN), and water (WAT), from Q2-2024 through Q1-2025. These contacts are received via phone, mail, email, or a website complaint form. In this quarter, CAB received **9,633 contacts**. The vast majority of contacts were about consumers’ energy and telecommunications (telco) services. The energy industry accounted for the largest share with **5,340 (55% of total)** contacts, slightly down from the previous quarterly total of **5,533** contacts. Telco followed with **2,976 (31%)** contacts, a similar number to the 2,903 contacts in the last quarter. Non-jurisdictional contacts increased slightly from **795** to **861 (9%)**, while water contacts declined from **510** to **277 (3%)**. Transportation contacts rose from **77** to **179 (2%)**, more than doubling from the previous quarter, though representing only a small fraction of all contacts.

Figure 1: Consumer Contacts by Industry and Quarter



² Exclude contacts where the category is “Unknown,” “Caller Not Online”, “Wrong Number”, or where the “Industry or Utility is Unknown.”

³ Consumer contacts related to concerns, disputes, and/or issues related to utilities that the CPUC has no regulatory authority over.

CAB Assisted 2,405 Consumers to Resolve Informal Complaints (ICs) in Q1-2025

CAB's IC process provides consumers with an accessible and efficient way to resolve disputes with their utility providers, eliminating the need for formal legal proceedings. The process helps ensure that consumer concerns are addressed in a timely and fair manner across CPUC regulated industries.

Table 1 shows the distribution of ICs resolved by industry from Q2-2024 through Q1-2025. CAB successfully resolved **2,405** ICs. Continuing the trend of the previous three quarters, most of the **1,649** cases were energy related, representing **69%** of all resolutions. The quarter also saw CAB resolve **675** telco cases, which were **28%** of all resolutions. Telco cases have seen a consistent decline over the last year. The water industry remained consistent, with **81** cases resolved, or **3%** of all ICs. No transportation ICs were resolved this quarter, reflecting the low volume observed throughout the past year.

While the total number of resolved cases declined compared to the previous quarter, the industry distribution remained consistent overall, with nearly all resolutions related to energy and telecommunications services.

Table 1: Informal Complaints Resolved by Industry and Quarter

Industry	Q2-2024	Q3-2024	Q4-2024	Q1-2025	% of Total Contacts (Q1-2025 only)
Energy	2,169	1,364	2,167	1,649	69%
Telecommunications	919	710	745	675	28%
Water	84	63	77	81	3%
Transportation	-	3	9	-	0%
Total	3,172	2,140	2,998	2,405	100%

CAB Facilitated the Return of \$458,104 to Consumers from Their Utilities in Q1-2025

CAB cases resulted in utilities returning **\$458,104** to consumers who submitted complaints via the Informal Complaint (IC) process. An IC is a written consumer contact expressing dissatisfaction with, or a dispute with, an action or practice regulated by the CPUC through tariffs, rules, orders, or other authority.⁴

⁴ The CPUC also has a Formal Complaint (FC) process. An FC is a written legal document which claims that a utility regulated by the CPUC has violated state laws or the CPUC's orders or rules. An FC describes these violations, the injury suffered due to them, and the resolution requested from the CPUC. FCs are overseen by an Administrative Law Judge in a formal proceeding. CAB focuses on ICs.

Table 2 presents the monetary returns issued to consumers in connection with all IC cases, categorized by corresponding industry and quarter. The bulk of the returns came from service providers in the energy and telecommunications industries. Energy providers continue to be overwhelmingly the largest source, issuing **\$328,300** in returns this quarter. This is similar to the previous quarter, where Telco providers are the second largest source of IC returns, but saw a modest decline, with returns decreasing from **\$122,072** in the last quarter to **\$102,283** in this one.

While water-related returns reached a yearly high of **\$27,426** this quarter (up from **\$22,095** in the last quarter), this represents a **tiny portion of overall returns**. Transportation-related returns also remained minimal. All in all, total returns saw a slight **3% decrease** from the previous quarter.

Table 2: Consumer Returns by Industry⁵ in the Last 4 Quarters

Industry	Q2-2024	Q3-2024	Q4-2024	Q1-2025
Energy	\$2,502,211	\$461,944	\$328,085	\$328,300
Telecommunications	\$132,964	\$186,980	\$122,072	\$102,283
Water	\$3,972	\$12,706	\$22,095	\$27,426
Transportation	\$99	\$35	\$10	\$95
Total	\$2,639,246	\$661,665	\$472,262	\$458,104

Table 3 highlights the average amounts returned to consumers. The largest returns (per consumer) were issued by providers in the following industries: **energy (\$2,039)**, **water (\$1,055)**, **telco (\$341)**, and **transportation (\$32)**.

The largest return of **\$53,262** was issued by San Diego Gas & Electric. After this utility denied that an adjustment was warranted, CAB continued to advocate for the consumer by submitting an appeal and requesting a more thorough investigation. The commitment of CAB staff in this case resulted in both the resolution of a long standing billing issue (since 2021), and a smart meter installation to reduce the chance of the issue resurfacing.

Additionally, CAB oversees the TEAM (Telecommunications Education and Assistance in Multiple-Languages) program. TEAM supports limited English proficient (LEP) consumers who need help managing their telco services. The program offers support through individually tailored case assistance, educational classes, and outreach. TEAM CBOs helped LEP consumers recover **\$20,195** from their telecommunications providers in this quarter.

⁵ This table only accounts for returns through CAB's IC process. Cases where a phone contact was transferred to a utility for expedited resolution are not reflected here.

Table 3: Q1-2025 Consumer Return Statistics by Industry (\$)

Industry	Avg. Return Amount	Count of Returns	Min. Return Amount	Max. Return Amount	Total Return Amount
Energy	\$2,039	161	\$0.77	\$53,262	\$328,300
Water	\$1,055	26	\$30	\$10,819	\$27,426
Telecommunications	\$341	300	\$2.60	\$7,545	\$102,283
Transportation	\$32	3	\$15	\$54	\$95
Total	\$3,467	490	N/A	N/A	\$458,104

Energy Utilities Recap with Q1-2025 Highlights

This section reviews consumer contacts that CAB received this quarter for all energy utilities.

Energy Consumer Contacts Q1-2025

Table 4 lists the Top 10 Energy Utilities by contact count and corresponding percentage of total contacts. CAB received **5,250**⁶ contacts from consumers about their energy services this quarter. The 10 energy utilities with the most consumer contacts accounted for **95%** of all contacts from this industry. Most of the contacts were from Southern California Edison (SCE) and Pacific Gas and Electric (PG&E) customers, accounting for 36% and 31% of the contacts, respectively.

Other providers featured in the Top 10 include Core Transport Agents (CTAs) such as Wave Energy LLC, United Energy Trading LLC⁷, and SFE Energy, Inc., with 246, 202, and 163 contacts, respectively. Overall, it is noteworthy that **21%** of energy-related contacts received this quarter were from CTA customers, primarily regarding abusive marketing practices. This report shines a spotlight on complaints about CTAs in the [Core Transport Agents and Abusive Marketing Complaints](#) section.

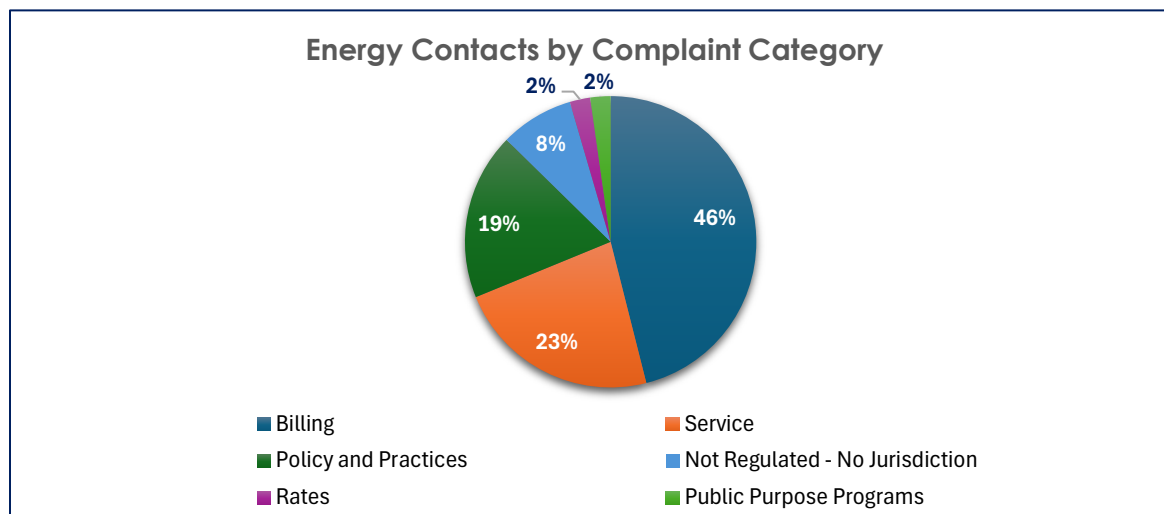
⁶ This figure excludes counts for misdirected correspondence meant for the utility or another agency, contacts who meant to call their service provider but reached the CPUC by mistake, and unknown industries or utilities.

⁷ dba Collective Energy

Table 4: Top 10 Energy Utilities by Consumer Contact Count (Q1-2025)

Energy Utility	Total	% of Total ⁸
Southern California Edison Company	1,876	36%
Pacific Gas & Electric Company	1,627	31%
Wave Energy LLC	246	5%
San Diego Gas & Electric Company	241	5%
Southern California Gas Company	239	5%
United Energy Trading LLC dba Collective Energy	202	4%
SFE Energy Inc.	163	3%
Spark Energy Gas LLC	93	2%
Big Tree Energy CA, LLC	89	2%
AAA Natural Gas	87	2%
Total Top 10 Energy Utilities Contacts	4,863	95%
Total Energy Contacts (All Energy Utilities)	5,250	100%

Figure 2 illustrates the energy consumer contacts received by complaint categories. In this quarter, almost half of the energy-related contacts were related to “Billing” (46%). The next most frequent complaint categories were related to concerns with “Service” (23%), “Policy and Practices” (19%), and issues that were classified as “Not Regulated - No Jurisdiction” (8%).

Figure 2: Energy Consumer Contacts by Category (Q1-2025)

⁸ Percentages are rounded to the nearest whole number.

Table 5 shows that more service contacts were received in January than in any other month this quarter or in Q4-2024. The reason behind the high incidence of Service contacts is that in January 2025, several communities served by SCE and SoCalGas in the Southern California Region experienced weather-related power outages and Public Safety Power Shutoffs (PSPS), due to high winds and wildfires in the region.

Table 5: Energy Consumer Contacts by Category (Q4-2024 through Q1-2025)

	Q4-2024			Q1-2025		
Contact Category	October	November	December	January	February	March
Billing	916	649	694	858	752	808
Service	370	478	348	614	289	291
Not Regulated - No Jurisdiction	227	153	135	140	142	146
Policy and Practices	113	100	164	387	291	295
Public Purpose Programs	73	41	40	40	42	36
Rates	22	16	14	41	28	50
Grand Total	1,721	1,437	1,395	2,080	1,544	1,626

Table 6 displays the energy utilities with the greatest number of ICs this quarter and ranks them by the average number of days each utility takes to address them. When CAB sends an IC to a utility, the expectation is that the utility will respond to CAB within **20 business days** to resolve it. CAB typically follows up with utilities that are not meeting response time targets to develop a working solution.

In this quarter, energy utilities responded to **1,640** ICs filed by consumers. San Diego Gas & Electric (SDG&E) and Spark Energy Gas LLC, a CTA, had the slowest average response times, at 27 and 23 calendar days, respectively. In contrast, SCE and PG&E, which received the largest number of ICs (644 and 529, respectively), had relatively faster average response times, at 19 and 11 calendar days, respectively. CAB often follows up with utilities that are not meeting response time targets to develop a working solution.

Table 6: Top 10 Energy Utilities by Case Count and Utility Response Times (Q1-2025)

Utility	Count of Case Responses	Average Response Time (No. of Days)
San Diego Gas & Electric Company	119	27
Spark Energy Gas LLC	24	23
StateWise Energy California LLC	19	22
SFE Energy Inc.	38	21
Southern California Edison Company	644	19
Southern California Gas Company	68	17
Big Tree Energy CA, LLC	23	14
United Energy Trading LLC dba Collective Energy	34	11
Pacific Gas & Electric Company	529	11
Wave Energy LLC	69	5

Most Frequent Contacts by Subcategory Q1-2025

When the CAB reports data on consumer contacts, we primarily categorize them by the **main reason** for the contact. The main reason is what we refer to as the "**primary subcategory**." For example, if a consumer calls about a high bill and difficulty reaching customer service, the "High Bill" would be selected as the primary subcategory under the broader "Billing" category.

However, CAB's Consumer Information Management System (CIMS) allows for a more detailed understanding of each contact. In addition to the primary subcategory, multiple **additional subcategories** (sometimes referred to as "attributes") can be selected to capture all the issues a consumer raises fully. For instance, in the example above, "customer service" would be chosen as an additional subcategory.

Because multiple subcategories can be applied to a single contact, the total count of subcategory selections will often exceed the total number of individual consumer contacts. This comprehensive approach helps us conduct a more in-depth analysis of the various reasons consumers reach out to CAB.

Table 7 shows the individual subcategories that were selected most frequently this quarter. The most common subcategory chosen was the "High Bill" subcategory, which was applied to **1,958** contacts (**21%** of all energy

contacts). The next most common subcategories were “Non-Jurisdictional Customer Service (NJ)”⁹ (1,501) and “Abusive Marketing” (801), which were applied to 16% and 9% of contacts, respectively.

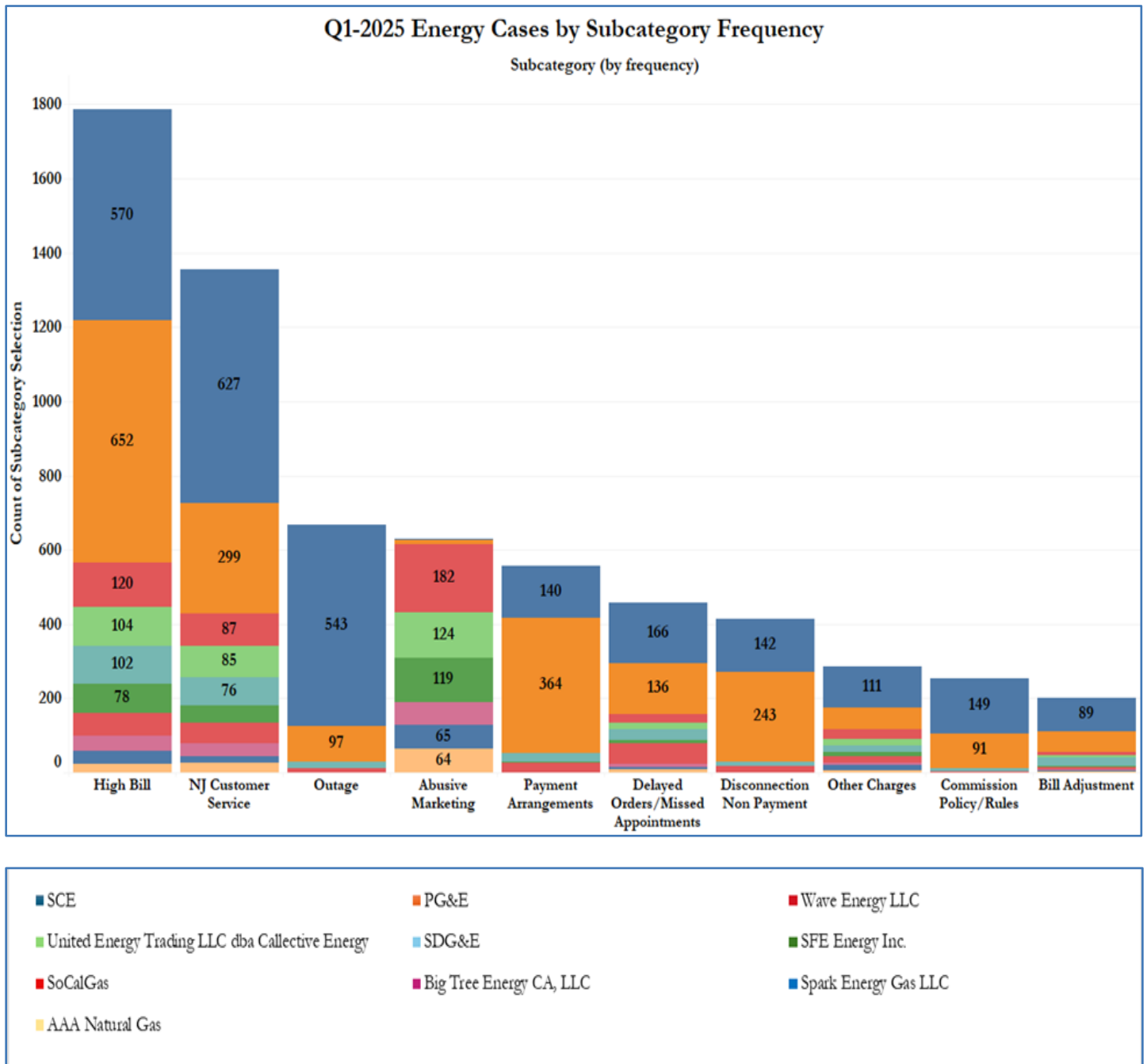
Table 7: Top 10 Subcategories by Frequency for All Energy Consumer Contacts

Subcategory	Count of Subcategory Selection	% of Total
High Bill	1,958	21%
NJ Customer Service	1,501	16%
Abusive Marketing	801	9%
Outage	672	7%
Payment Arrangements	568	6%
Delayed Orders/Missed Appointments	505	5%
Disconnection Non-Payment	421	5%
Other Charges	323	3%
Commission Policy/Rules	259	3%
Bill Adjustment	209	2%

Figure 3 takes the energy utilities with the most contacts and displays the most frequently chosen reasons (CAB subcategories) for these contacts (by utility). The chart shows that most contacts about “High Bill” (652), “Payment Arrangements” (364), and “Disconnection Non-payment” (243) originated from PG&E customers. They contacted CAB to address concerns about their bills, secure payment arrangements for outstanding bills, or seek assistance to restore disconnected service. In contrast, SCE led in other subcategories featured in the Top 10, such as “NJ Customer Service” (627), “Outage” (543), and “Delayed Orders/Missed Appointments” (166). “NJ Customer Service” refers to customer service-related issues that the CPUC does not regulate. These include, but are not limited to, complaints about rude utility representatives, being transferred multiple times within a single phone call, and being unable to reach the correct department or someone to assist with their issue. The “Abusive Marketing” subcategory primarily consists of complaints from customers of CTAs who claim they were misled by a CTA that failed to provide proper disclosures or added extra services or features without their consent, among other complaints.

⁹ No Jurisdiction (NJ) Customer Service cases are 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.

Figure 3: Top 10 Subcategory Frequencies for Top 10 Energy Consumer Contacts



Telecommunications Utilities Q1-2025

Highlights

Table 8 provides a detailed summary of the total number and percentage of consumer contacts received about this group of ten utilities. In this quarter, CAB received a total of **2,976** telecommunications (telco) related contacts from consumers. The ten telco utilities generating the most consumer contacts accounted for **69%** of all such contacts. This indicates that most telco consumers' concerns originated from a select group of service providers. Similar to previous periods, the number of telco consumer contacts received was by far the highest in connection with AT&T California, totaling **911** contacts (**31%** of all telco contacts). Frontier California Inc. followed as the company with the next highest number of contacts, at 285 (10%), while Verizon Wireless had 207 contacts (7%).

Table 8: Consumer Contacts by Telecommunications Utility (Top 10) in Q1-2025

	Q1-2025	% of Total
Total Telecommunications Contacts	2,976	100%
Top 10 Utilities (by contacts received by CAB)		
AT&T California	911	31%
Frontier California Inc.	285	10%
Verizon Wireless	207	7%
Charter Fiberlink CA-CCO, LLC	125	4%
T-Mobile West LLC	118	4%
AT&T Mobility Wireless Operations Holdings Inc.	107	4%
Comcast Phone of California, LLC	102	3%
TruConnect Communications, Inc.	76	3%
Assurance Wireless USA, L.P.	66	2%
TracFone Wireless, Inc.	55	2%
Total Contacts	2,052	69%

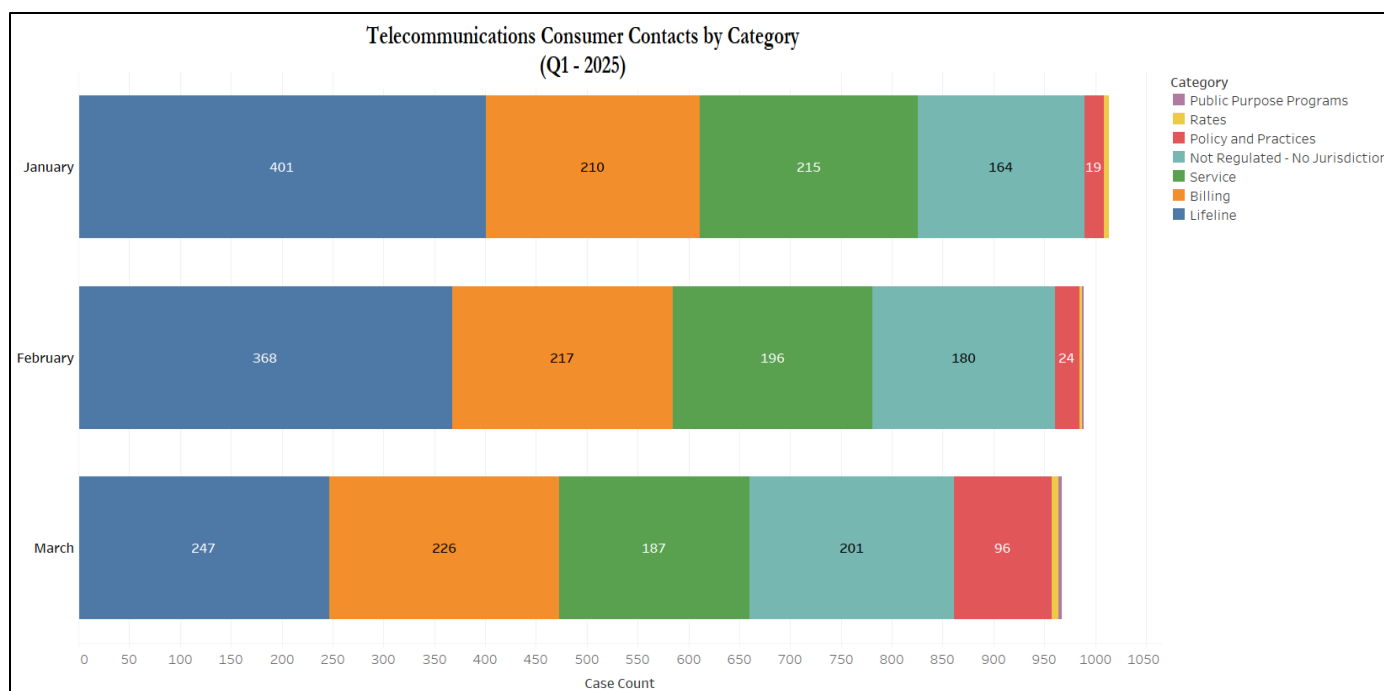
Figure 4 shows telco related consumer contacts received by category (reason for contact) in this quarter. In terms of trends, “Lifeline”¹⁰ was the leading category each month, with the highest number of contacts in January at **401** cases, followed by **368** in February and **247** in March. This indicates consistent interest in accessing discounted telecommunication services. “Billing”¹¹ contacts showed a consistent upward trend

¹⁰ The California LifeLine Program (California LifeLine) is a state program that provides discounted home phone and cell phone services to eligible households. For more information, please refer to: <https://www.californialifeline.com/en>.

¹¹ Relates to disputed items appearing on a consumer's utility bill, the appearance of the bill, or other utility charges.

throughout the quarter, increasing from **210** in January to **226** in March. This may indicate a growing number of consumer concerns regarding billing accuracy, charges, or payment issues. “Service” related contacts remained relatively stable, with **215** contacts in January, **196** in February, and **187** in March, reflecting ongoing concerns with service quality provided to consumers by the utility. Contacts categorized as “Not Regulated-No Jurisdiction”¹² also represented a substantial portion of consumer contacts, increasing from **164** in January to **201** in March. This trend underscores the importance of providing clear guidance and enhancing awareness about utility issues that fall under the CPUC's purview. “Policy and Practices” related¹³ contacts experienced a sharp increase in March, primarily driven by AT&T’s request to be relieved of its Carrier of Last Resort (COLR) obligations in some areas of California.¹⁴ The number of contacts spiked to **96** compared to **19** in January and **24** in February. Issues related to “Rates”¹⁵ and “Public Purpose Programs”¹⁶ remained low but consistent throughout the quarter. Overall, telco consumer contacts this quarter reflected a broad and varied distribution across all issue categories, indicating a wide range of consumer concerns, with “Lifeline,” “Billing,” and “Service” related issues at the forefront.

Figure 4: Telecommunications Consumer Contacts by Category in Q1-2025



¹² Consumer contacts related to concerns, disputes, and issues over items where the CPUC has no jurisdiction.

¹³ Consumer contacts related to utility policies and practices and CPUC policy and practices.

¹⁴ Please refer to: <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/att-colr-etc-proceedings>

¹⁵ Consumer contacts related to rate design, rate protests and baseline rates.

¹⁶ Programs that help consumers – operated by utilities or other organizations e.g., low income and deaf and disabled consumers.

Main Reasons Why Consumers Contacted CAB About Telco Utilities Q1-2025 (Excluding Lifeline)

CAB reports contact data by grouping cases based on the “primary subcategory,” which reflects the main reason why the consumer contacted CAB. CAB’s Consumer Information Management System (CIMS) database also allows multiple subcategories (called attributes) to be added to the contact. This helps provide a more detailed description and supports deeper analysis. Therefore, the total count of subcategory selections exceeds the total number of contacts from telco consumers because multiple subcategories can be applied to a single contact.

Figure 5 examines the telco utilities with the most contacts (Top 10) and highlights the most frequent reasons (subcategories) for which consumers contacted CAB about these providers. “NJ Customer Service Issues” accounted for the highest number of contacts, totaling **588** cases. These included **232** from AT&T California and a significant volume from Verizon Wireless, Frontier California Inc., and T-Mobile West LLC.

“Outages”¹⁷ followed as the second most reported issue with **372** contacts. AT&T California alone contributed **248** cases, suggesting continued infrastructure or reliability concerns across its network.

“High Bill”¹⁸ complaints generated **355** contacts, with AT&T California again being the leading source, accounting for **133** cases. Other notable contributors included Frontier California Inc., Verizon Wireless, and Charter Fiberlink CA-CCO, LLC. These contacts indicate ongoing concerns about billing transparency, unexpected charges, or plan changes.

“Delayed Orders/Missed Appointments”¹⁹ were also a significant issue, with **319** reported cases. This included **191** from AT&T California and **66** from T-Mobile West LLC, highlighting the need for improved scheduling, service delivery, and communication. “Other Charges”²⁰ prompted **254** contacts, with a further **233** contacts related to “Non-Regulated Internet Billing, Service, or Equipment Issues,” which particularly affected customers of AT&T California, Verizon Wireless, and Frontier California Inc.

¹⁷ Outage cases are any disruption (planned or unplanned) unrelated to non-payment and includes landlines and wireless service.

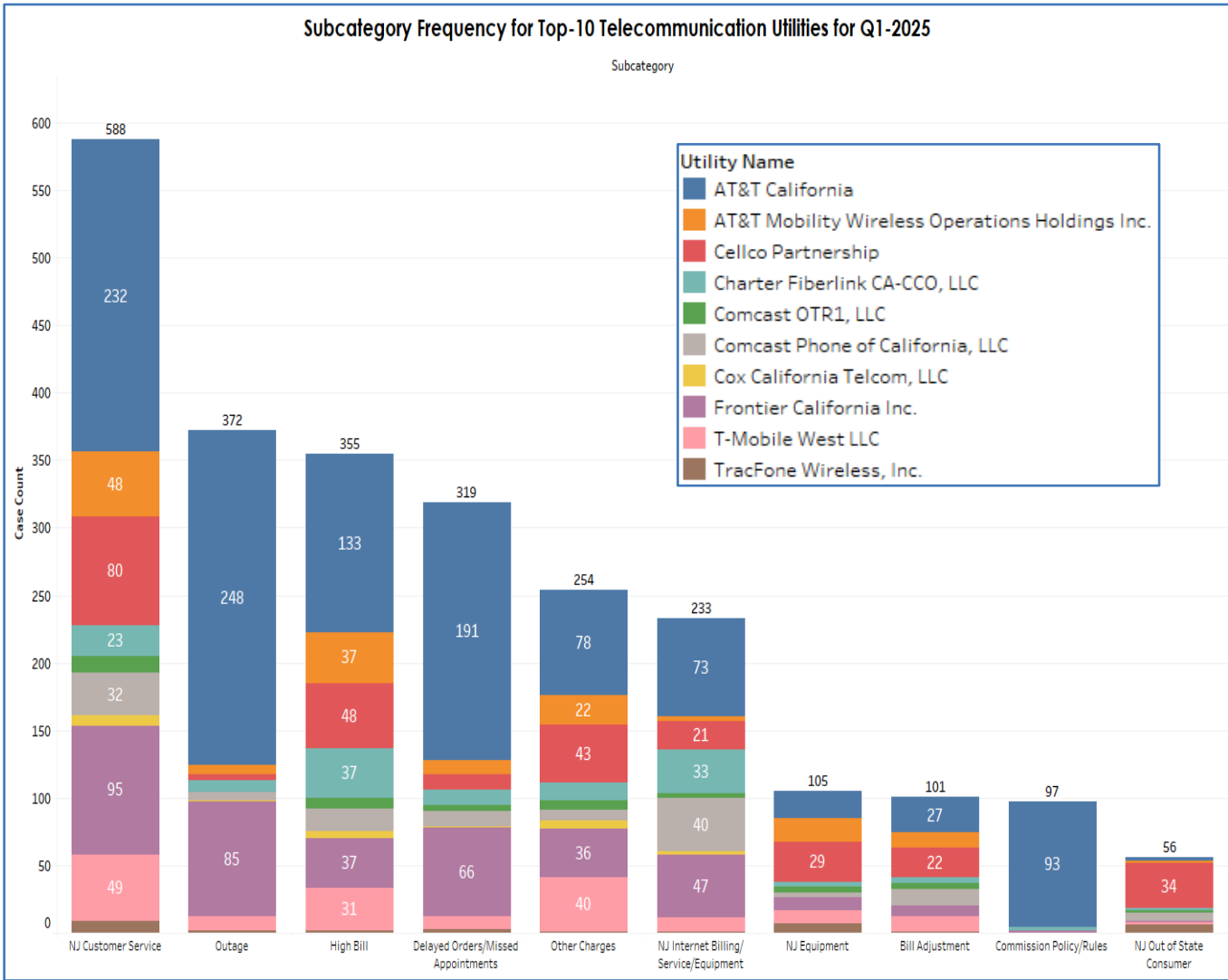
¹⁸ High bills cases are complaints regarding bills that are higher than normal, and consumers cannot think of possible reasons that could account for the level of use as stated on the bill. This also includes duplicate billing issues. May also include consumers that are disputing the validity of usage increase.

¹⁹ related to field or non-field visit appointments missed by the utilities’ representative. Typically caused by delayed orders or a heavy workload. This also includes utility not cancelling service per consumer’s request.

²⁰ Other charges cases include roaming, 411, returned check charges, transfer charges, activation fee, closed account charges (i.e. consumer terminated service with utility and is still receiving bills even though account balance was \$0 at termination). This includes pre-paid cards.

Smaller but notable contact volumes were seen with “Non-Regulated Equipment”²¹ complaints (105 contacts), “Bill Adjustments”²² (101), and “Commission Policy/Rule” inquiries (97).²³ Most of these contacts were directed at AT&T California. Finally, out-of-state consumer contacts not under CPUC jurisdiction accounted for 56 cases, led primarily by Verizon Wireless and T-Mobile West LLC.

Figure 5: Subcategory Frequency for Top 10 Telecommunication Utilities for Q1-2025



²¹ Consumer contacts that involve any additional equipment for services such as modems, routers, cable box, cellular devices, etc.

²² Bill adjustment cases are discount related to a public purpose program subsidy or other discount not appearing on consumer's bill when they are supposed to. This also includes issues related to returns and a utility promising a credit.

²³ Commission Policy/Rules cases are related to consumer's question/complaint/concern regarding Commission policies, practices, rules, general orders, or decisions. This is applied only for Commission actions, and not the utilities.

LifeLine

CAB has three dedicated specialists who assist consumers with inquiries and questions related to the California LifeLine program. In addition to providing direct consumer support, CAB reviews any appeals filed by consumers who were disqualified from LifeLine by the program’s Third-Party Administrator (TPA). CAB also facilitates the resolution of LifeLine billing issues by referring cases to service providers for investigation and implementation of any necessary actions.

Table 9 breaks down the total of LifeLine contacts received by format (written or phone), as well as cases closed in this quarter. Contacts refer to any instance when a consumer reaches out to CAB, and cases are created when a contact results in an issue that requires a resolution. During this quarter, CAB received a total of **972** LifeLine contacts, representing a 20% quarterly increase. Just over **two-thirds** of these were written contacts (**675**), representing a 30% increase over the previous quarter. The remaining **297** were phone contacts – a 2% increase from the prior quarter.

Among the **675** closed written cases, “LifeLine Landline Appeals”²⁴ and “LifeLine Billing”²⁵ were the most common issues. The former grew by **43%**, from **276** cases in Q4-2024 to **396** cases in Q1-2025. Billing cases also increased significantly, rising **45%** from **121** in Q4 2024 to **175** cases this quarter. These two issues remained the top drivers of written LifeLine complaints, indicating persistent concerns related to service eligibility and billing accuracy. The upward trend in LifeLine inquiries and complaints underscores CAB’s crucial role in resolving consumer issues and ensuring that LifeLine participants receive appropriate support.

Table 9: LifeLine Contacts Received and Closed Written Cases (Q1-2025)

	2024			2025	
Format of LifeLine Contact Received	Q2	Q3	Q4	Q1	% Change Q4-2024- to Q1-2025
Phone Contact	279	349	292	297	2%
Written Contact	369	330	518	675	30%
Total Contacts Received	648	679	810	972	20%
Top LifeLine Cases Closed by Type	Q2	Q3	Q4	Q1	% Change Q4-2024 to Q1-2025
LifeLine Landline Appeal	100	46	276	396	43%
LifeLine Billing	131	200	121	175	45%

²⁴ LifeLine Landline Appeal cases involve appeals related to LifeLine services provided by landline carriers.

²⁵ LifeLine Billing cases involve billing complaints related to LifeLine services.

Figure 6 presents the most common types of LifeLine cases that CAB worked on during the first quarter of 2025 (Top 10 types). The most frequently reported LifeLine issue was “Consumer Did Not Return Form”²⁶, with **125** cases in January, **109** in February, followed by a sharp drop to **20** in March, totaling **254** cases for the whole quarter. This trend suggests that most cases are at the beginning of the year, likely driven by deadlines related to form submission and annual recertification requirements.

The second most frequent subcategory was “LLB Federal Program/Equipment”²⁷, with **96** cases in both January and February, and **54** in March, totaling **246** cases.

“LL Documents Not Provided/Does Not Meet Guidelines”²⁸ ranked third, with **75** cases in January, **43** in February, and **24** in March, totaling **142** cases. The decrease may reflect consumers’ efforts early in the year to complete eligibility processes.

“LLB Application Request”²⁹ demonstrated a rising trend, increasing from **29** cases in January to **42** in February and **56** in March, totaling **127** cases. This growth may be attributed to growing consumer interest or outreach efforts later in the quarter.

Other notable subcategories included “LL Signature/Printed Name Does Not Match or is Missing”³⁰, which declined from **66** cases in January to **38** in February and only **5** in March, totaling **109** cases. Similarly, the number of “LL Initials Missing” cases decreased from **46** in January to **28** in February and **4** in March, totaling **78** cases.

“LL Policy/Practices”³¹ remained relatively small but consistent, with **29** cases in January, **28** in February, and **18** in March, totaling **75** cases. “LLB Discount Switched to Other Carrier”³² rose from a low of **15** in January to **21** in February and **34** in March, totaling **70** cases, suggesting increased carrier switching activity later in the quarter.

“NJ Customer Service” showed moderate activity with **17** cases in January, **26** in February, and **24** in March, totaling **67** cases. “LLB Approved for Discount” (but not receiving) followed a similar pattern, increasing from **14** cases in January to **20** in February and **22** in March, totaling **56** cases.

²⁶ Applies when forms are not returned, missing household worksheets, or applications are late.

²⁷ Involves challenges consumers face in receiving or replacing free or discounted phones provided by LifeLine wireless carriers.

²⁸ Pertains to situations where consumers failed to submit required documentation or were deemed ineligible based on LifeLine income or program guidelines.

²⁹ When consumer claims to have requested a new LifeLine Application Form from their service provider but has not received it.

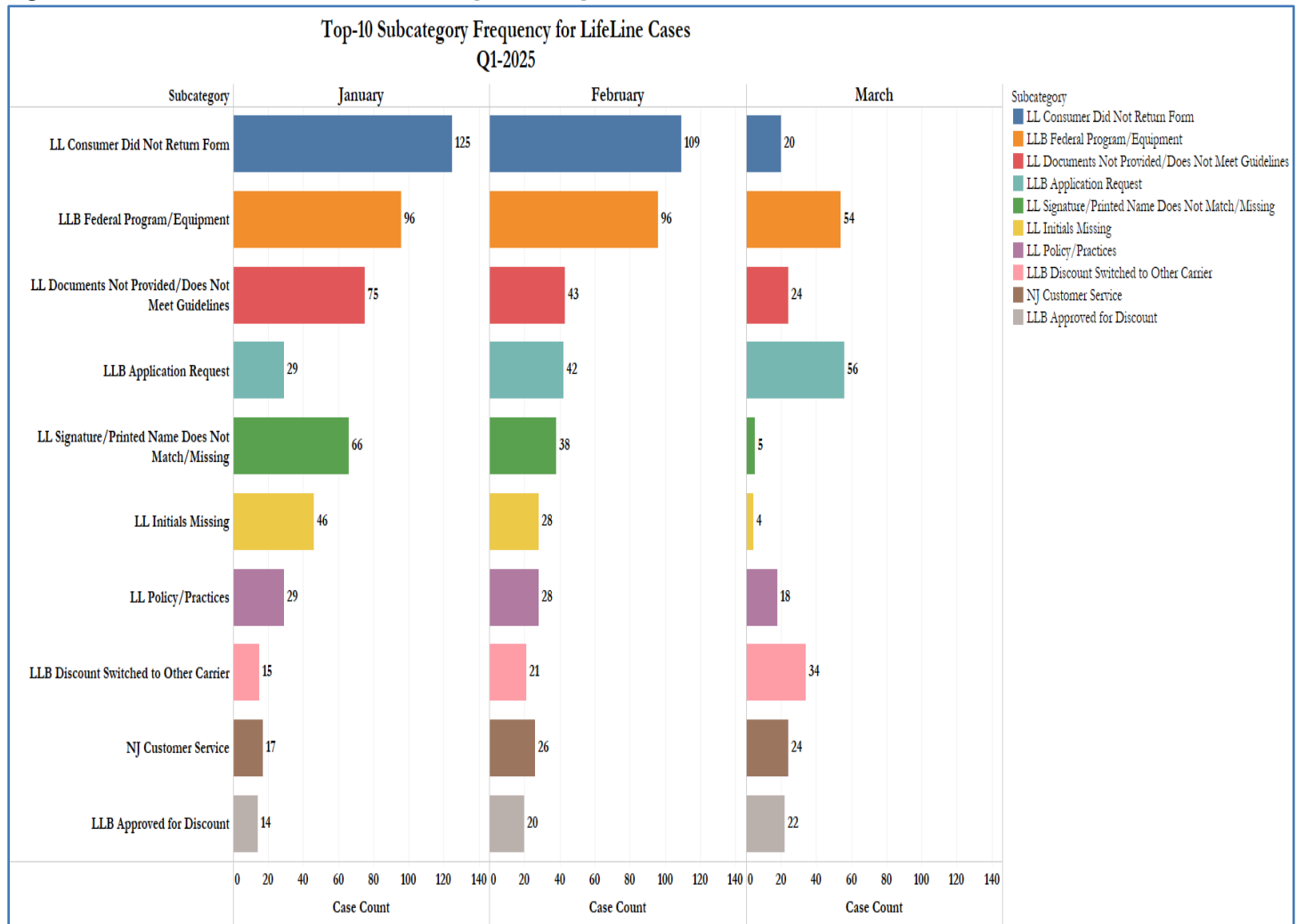
³⁰ Consumer's application was missing signature(s) on the application form or the household worksheet; the signature on the Form does not match applicant's name; or the consumer did not print their first and last name.

³¹ Indicates dissatisfaction with LifeLine mandated policies or procedures but not an appeal or a service provider direct complaint.

³² Selected when consumer claims their LifeLine discount with one service provider has been ported out to another service provider with or without consent and is not receiving the discount.

These trends emphasize the seasonal nature of specific subcategories, particularly those related to documentation and form returns, while highlighting consistent consumer issues tied to program access and service delivery. The data underscores CAB’s essential role and commitment to supporting qualifying consumers’ ability to enroll in and access essential programs, such as the LifeLine program.

Figure 6: Most common LifeLine Cases (Q1-2025)



Environmental Social Justice (ESJ) Consumer Contacts for Q1-2025

ESJ Overview

The CPUC's mission is to empower California through access to safe, clean, and affordable utility services and infrastructure. The CPUC is tasked with serving all Californians. To do so effectively, it must acknowledge that some populations in California face higher barriers to accessing clean, safe, and affordable utility services.

“Environmental justice” means the fair treatment of people of all races, cultures, and incomes with respect to environmental laws, regulations, and policies. The CPUC has created the Environmental and Social Justice (ESJ) Action Plan to serve as both a commitment to furthering these principles and a framework to integrate ESJ considerations throughout the agency's work.

The ESJ Action Plan defines ESJ Communities as including³³:

- low-income or communities of color that have been underrepresented in the policy setting or decision-making process;
- subject to a disproportionate impact from one or more environmental hazards;
- likely to experience disparate implementation of environmental regulations and socio-economic investments in their communities;
- Disadvantaged Communities, defined as census tracts that score in the top 25% of CalEnviroScreen 3.0, along with those that score within the highest 5% of CalEnviroScreen 3.0's Pollution Burden but do not receive an overall CalEnviroScreen score 20 21;
- all Tribal lands;
- low-income households;³⁴ and
- low-income census tracts.³⁵

CAB focuses its attention primarily on the zip codes that fall into the 75th-100th ESJ percentile, representing the "most disadvantaged communities" and "Quartile 1". However, CAB still utilizes the ESJ data to analyze consumer complaints across the other three socio-economic quartiles.

³³ <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/news-office/key-issues/esj/esj-action-plan-v2jw.pdf>, See pp. 11-12

³⁴ Household incomes below 80 percent of the area median income.

³⁵ Census tracts with household incomes less than 80 percent area or state median income

Energy and Telecommunications ESJ Highlights Q1-2025

- CAB received 2,221 ESJ contacts from energy and telecommunications consumers in Quartile 1 (the 75th-100th percentile), representing a 24% increase over the last year.³⁶
- 1,065 telecommunications outage complaints received in the last 12 months.
- Complaints against Core Transport Aggregators (CTAs) reached a record quarterly high, more than doubling compared to the last quarter.

Total Telco and Energy ESJ Contacts

Table 10 illustrates the upward trend of energy and telecommunications related contacts from consumers residing in zip codes where their ESJ percentile is calculated between 75 and 100 (using CalEnviroScreen). These are otherwise defined as Disadvantaged Communities (DACs) throughout this section. Complaints in DACs have increased by 23% for energy contacts and 26% for telco contacts, resulting in a total increase of 24% over the last four quarters.

Table 10: Energy and Telecommunications ESJ Contacts, Quartile 1 (75th – 100th percentile)

	Q2-2024	Q3-2024	Q4-2024	Q1-2025	% Increase (Q2-2024 to Q1-2025)
Energy (Quartile 1)	1,164	1,589	1,586	1,428	23%
Telco (Quartile 1)	630	697	736	793	26%
Total	1,794	2,286	2,322	2,221	24%

What Consumers in the Most Disadvantaged Communities Complain Most About

Table 11 presents the frequency of subcategories (i.e., the number of times an issue was selected to describe consumer contact) in the most disadvantaged communities. “Payment Arrangements” and “High Bills” accounted for 36% of contacts in the 75th to 100th percentile, indicating that affordability concerns are the primary issue affecting ESJ consumers. These were followed by “Disconnection Non-Payment” and “Customer Service” issues. “Abusive Marketing” was also significant as a surge in complaints against Core Transport Aggregators (CTAs) peaked this quarter.

³⁶ ESJ contact counts are a little challenging because identifying and categorizing an ESJ contact depends on a valid California zip code entered into the case record. Many contacts, particularly phone contacts, do not contain usable zip code information.

Table 11: Q1-2025 Subcategory Frequency for Energy Consumers in the Most Disadvantaged Communities, Quartile 1 (75th - 100th ESJ percentile)

Subcategory	Count of Subcategory Selection	%
Payment Arrangements	639	19%
High Bill	596	17%
Disconnection Non-Payment	480	14%
NJ Customer Service	340	10%
Abusive Marketing	325	9%
Delayed Orders/Missed Appointments	274	8%
Other Charges	238	7%
Outage	213	6%
Disputed Customer of Record	166	5%
Early Termination Fee/ETF	157	5%
Grand Total	3,428	100%

Table 12 shows the subcategory frequency for telco customers in the most disadvantaged communities. Their number one issue is poor customer service from carriers, followed by service issues (including outages, delayed repairs, and missed appointments). Consumers' Top 10 issues with their carriers include four Lifeline subcategories and billing issues such as "High Bill" and "Other Charges".

Table 12: Q1 2025 Subcategory Frequency for Telecommunications Consumers in the most disadvantaged Communities, Quartile 1 (75th to 100th ESJ percentile)

Subcategory	Count of Subcategory Selection	%
NJ Customer Service	190	21%
Outage	156	17%
Delayed Orders/Missed Appointments	117	13%
High Bill	95	10%
LLB Federal Program/Equipment	78	9%
Other Charges	75	8%
LL Consumer Did Not Return Form	57	6%
NJ Internet Billing/Service/Equipment	53	6%
LLB Application Request	52	6%
LL Documents Not Provided/Does Not Meet Guidelines	36	4%
Grand Total	909	100%

Disconnection Non-Payment Contacts

Table 13 shows that “Disconnection Non-Payment” (DNP) contacts consistently increased across the previous three quarters and dipped slightly in Q1-2025. However, “DNP” contacts have increased by **29%** over the last year. Quartile 1 continues to produce the most “DNP” contacts. This is not surprising, as the most disadvantaged communities contain zip codes with the lowest median household incomes and highest housing insecurity in the state.

Table 13: Q2-2024 through Q1-2025 Energy Disconnection Non-Payment Contacts in all ESJ Quartiles

ESJ Percentile/Quartile	2024-Q2	2024-Q3	2024-Q4	2025-Q1	% Increase (Q2-2024 to Q1-2025)
Quartile 1 (75 th -100 th percentile)	159	181	261	219	38%
Quartile 2 (50 th -74 th percentile)	117	117	107	126	8%
Quartile 3 (25 th -49 th percentile)	67	78	78	98	46%
Quartile 4 (0-24 th percentile)	32	47	55	39	22%
Total	375	423	501	482	29%

Telecommunications Outage Complaints

Since at least the 1990s, California’s local exchange carriers (LECs) and their landline customers have struggled with a deteriorating copper infrastructure, which has led to problems including repeated outages, call quality declines, and long waits for repairs. Ongoing issues with telephone service quality, stemming from aging copper landline infrastructure, have led to repetitive outages and delays in service repairs. Consequently, some landline customers go without telephone service for months at a time.³⁷

Technology evolutions have led to a reduction in the demand for copper landlines, and the LECs have implemented various strategies to further reduce or eliminate traditional landlines due to their high maintenance costs. However, many customers resist switching to other technologies due to safety concerns, unavailability, or unreliability of competitive networks.

On March 3, 2023, AT&T petitioned to relinquish its status and responsibilities as a carrier of last resort (COLR) in California. Fifteen months later, AT&T’s petition was rejected.³⁸ A COLR is a telecommunications service provider that stands ready to provide basic telephone service, commonly via landline, to any customer requesting such service within a specified area. At least one telephone company in a specified area is legally required to provide access to telephone service to anyone in its service territory who requests it. This is known

³⁷ Young, Linette, Master’s Thesis, “Somebody’s Going to Have to Die or Move – A GIS Analysis of Telephone Service Quality, 2001

³⁸ Please refer to: <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/att-colr-etc-proceedings>

as the COLR obligation, which ensures that everyone in California has access to safe, reliable, and affordable telephone service.

The CPUC’s rejection of AT&T’s request underscores the critical importance of ensuring universal access to essential telecommunications services for all Californians. As the designated COLR, AT&T plays a pivotal role in providing reliable telephone service to communities across the state. Despite AT&T’s contention that providers of voice alternatives to landline service, such as VoIP or mobile wireless services, can fill the gap, the CPUC found AT&T did not meet the requirements for COLR withdrawal. Specifically, AT&T failed to demonstrate the availability of replacement providers willing and able to serve as a COLR³⁹, nor did AT&T prove that alternative providers met the definition of a COLR.⁴⁰

Table 14 shows the counts of outage contacts in the telecommunications industry over the last four quarters. AT&T consistently surpasses all other carriers in outage complaints each quarter and exceeds the next highest carrier by **433 contacts** over the last year. AT&T’s outage complaints are disproportionately high in the zip codes in the most disadvantaged neighborhoods (the 75th to 100th ESJ percentile) compared to the other ESJ percentile zip codes in its territory.

Table 14: Outage Contacts Q2-2024 through Q1-2025 and % of Contacts by ESJ percentile/Quartile (Top 5 Telcos for outage complaints)

Utility Name	Total Outage Contacts	% of Contacts by ESJ percentile Quartile				
		Quartile 1	Quartile 2	Quartile 3	Quartile 4	Total % ⁴¹
AT&T California	721	44%	12%	21%	14%	91%
Frontier California Inc.	288	18%	25%	23%	18%	84%
Charter Fiberlink CA-CCO, LLC	20	50%	15%	15%	15%	95%
Comcast Phone of California, LLC	19	21%	26%	21%	32%	100%
Citizens Telecommunications Co. of Ca.	17	12%	53%	6%	18%	89%
Grand Total	1,065	n/a	n/a	n/a	n/a	n/a

³⁹ CPUC rules require a COLR in all service areas to ensure universal access to telecommunications services. COLR rules are technology-neutral and do not distinguish between voice services offered (such as Plain Old Telephone Service (POTS), commonly known as landline service, or Voice over Internet protocol (VoIP)), and do not prevent AT&T from retiring copper facilities or from investing in fiber or other facilities/technologies to improve its network

⁴⁰ Proceeding A.23-03-003, D. 24-06-024

⁴¹ Quartile Grand Total percents will not always add to 100 percent because ESJ contacts are identified by the zip code associated with the case. Not all outage contacts have a valid California zip code associated with the case. We include all outage contacts in the total; however, they will not always equal the contacts that are apportioned by ESJ Quartile.

Core Transport Agents (CTA) and Abusive Marketing Complaints

CTAs are non-utility gas suppliers who purchase natural gas for residential and small commercial end-use customers. Suppose a consumer elects to take CTA service from one of the many such providers in California. In that case, the consumer can buy natural gas from the CTA but pay the utility for gas delivery service on its distribution pipelines. Depending on the consumer's billing option, they may receive bills from the utility, the CTA, or both.

The CPUC does not regulate the rates CTAs charge their customers. However, CTAs must register with the CPUC to conduct business in California. Since the CPUC can suspend or revoke the registration of a non-compliant CTA, it can effectively process consumer complaints against CTAs.⁴²

Table 15 shows the count of CTA contacts over the previous 12 months, by quarter, beginning with Q2 2024. CTA complaints have increased every quarter over the last 12 months. However, this quarter witnessed a **210% increase in** complaints about CTAs, to their **highest level since 2018**.

Table 15: All CTA Related Contacts 2018-2024

Quarter/Year	Q2-2024	Q3-2024	Q4-2024	Q1-2025	% Change between Q2-2024 and Q1-2025
Count of CTA Contacts	356	478	500	1,104	210%

⁴² The CIMS database contains the subcategory “Abusive Marketing”, which is defined as a practice that misleads a utility customer by not providing a promised service at the promised price, failing to provide proper disclosures, or adding extra services or features without the consumer's consent.

Figure 7 shows the geographical distribution of CTA contacts. The contacts are clustered most intensively in the Central and San Joaquin Valleys and the San Francisco Bay Area, indicating that the CTAs may be most active in these areas. The San Joaquin Valley had the highest concentration among these three areas. Few complaints were generated in Southern California.

Figure 7: Q1-2025 CTA Contacts by Zip Code

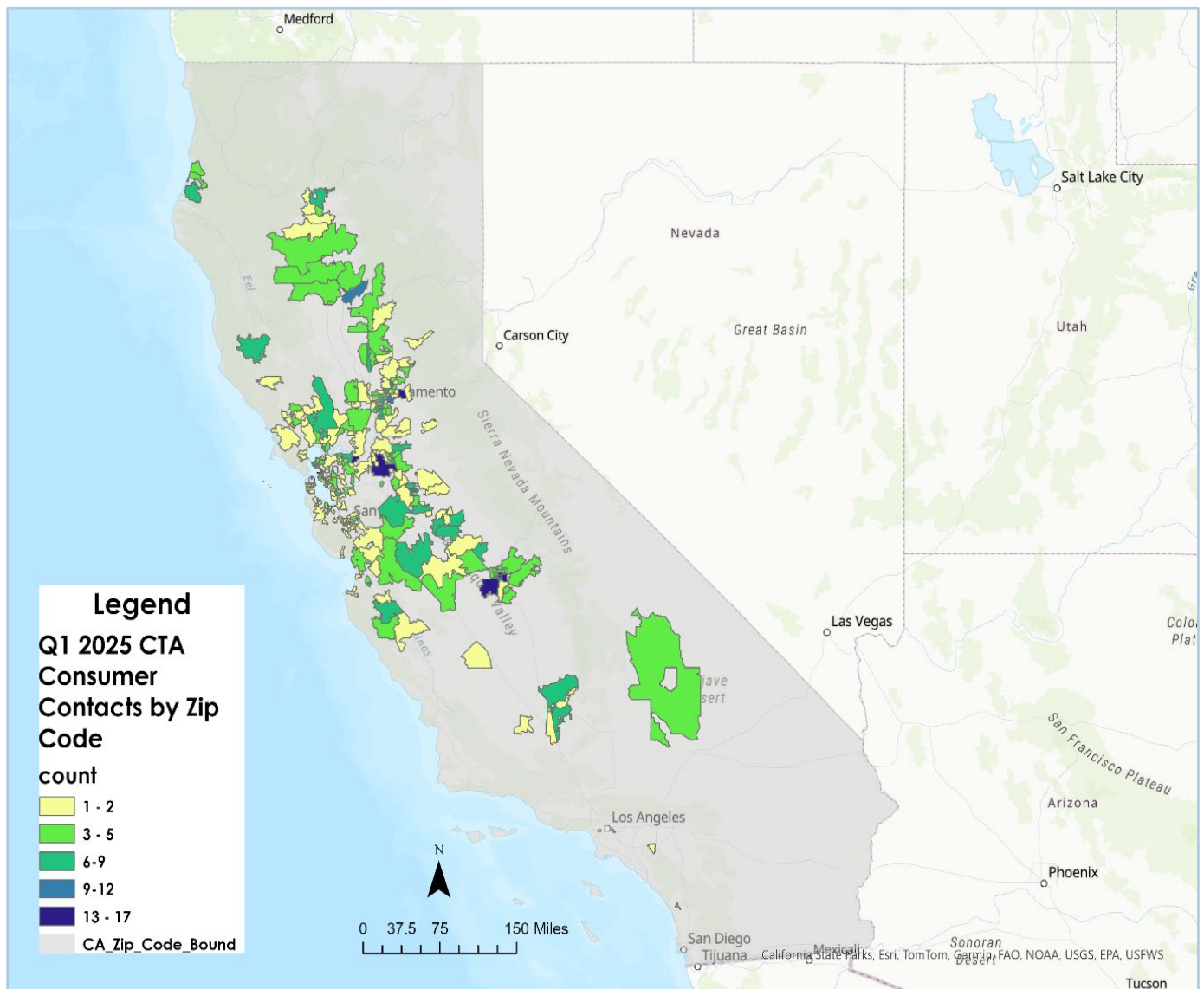
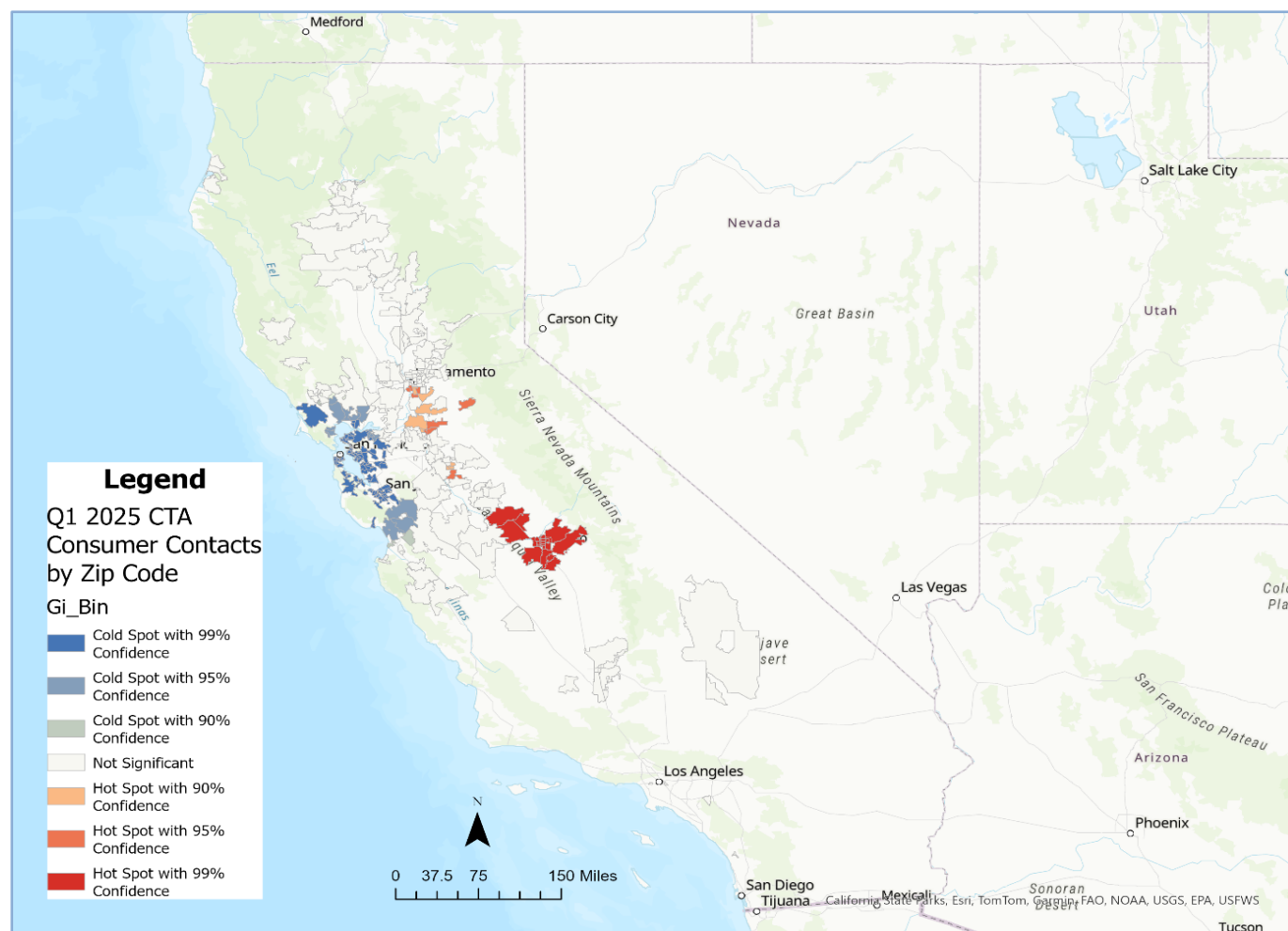


Figure 8 displays the CTA contact data as statistically significant clusters of "Abusive Marketing" contacts, represented as hot (red) and cold (blue) spots.⁴³ This visualization reinforces the trend mentioned earlier, with hotspots being particularly prominent in the San Joaquin and Central Valleys, specifically in the zip codes surrounding Stockton and Fresno. The hot spots indicate zip codes with a high number of "Abusive Marketing" contacts compared to others, and the geographic proximity of these contacts shows dense clustering.

Figure 8: CTA "Abusive Marketing" Contacts mapped as Hot and Cold Spots



⁴³ Hotspot analyses use vectors (points, lines, polygons) to identify locations of statistically significant hot spots and cold spots in the data by aggregating points of occurrence into polygons or converging points that are in proximity to one another based on a calculated distance and found in a cluster. An area can be considered a hotspot if a higher-than-average occurrence of the event being analyzed is found in a cluster. A hot spot is an area that has a greater than average number of abusive marketing complaints, and cooler to cold spots occur with less than average occurrences. The higher above the average an area is with similar surrounding areas the 'hotter' the hotspot, and conversely the lower the average with similar surrounding areas, the cooler the cool spot.

Figure 9 tracks CTA “Abusive Marketing” contacts for the four ESJ Quartiles over a seven year span. This confirms the conclusions reached in our previous reports, which indicate⁴⁴ that ESJ Quartile 1,⁴⁵ with the most vulnerable population, is consistently targeted more than the other quartiles. During the most recent quarter, “Abusive Marketing” complaints **surged for all quartiles** to unprecedented new levels, indicating that the CTAs may be implementing new and more aggressive marketing strategies.

Figure 9: “Abusive Marketing” Contacts about CTAs by ESJ Quartile 2018-2025

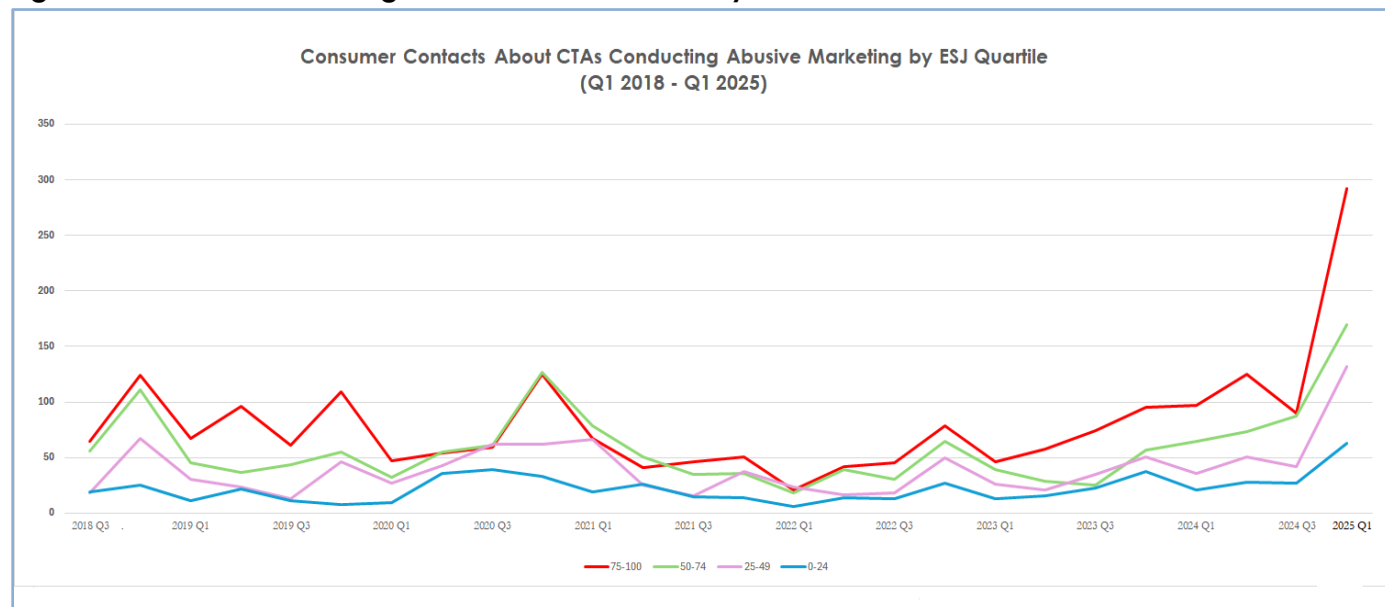


Table 16 reflects the most recent four quarters of consumer contacts from the chart above and shows, by quartile, the dramatic **219%** increase in “Abusive Marketing” complaints over the past 12 months.

Based on a review of cases in our CIMS database, we have found this to be a common trend in 2024 and is continuing into 2025, backed by supporting anecdotal evidence from utility customers noted in CIMS. Based on customer complaints, what we are gathering is the following sequence of events:

1. Door-to-door marketing campaigns solicit consumers with promises of lower rates and overall bills. Additional charges that are added to the bills are not mentioned. The consumer may be turned into a customer with or without the customer’s consent at the door.
2. Next, the first bill arrives, and customers experience bill shock because they are paying a higher total for their gas services, and there are additional charges on their bill that they were not made aware of at the point of sale.

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45 Quartile 1 (75th-100th ESJ percentile) are the most disadvantaged communities and quartile four the most advantaged communities according to ESJ definitions.

- Finally, customers who try to cancel their service with the CTA and return to the IOU are hit with high early termination fees totaling hundreds of dollars.

Table 16: Consumer Contacts About CTAs Where Abusive Marketing is the Top Subcategory in all Four ESJ Quartiles

ESJ Quartile	Q2-2024	Q3-2024	Q4-2024	Q1-2025	% Change (Q2-2024 to Q1-2025)
Quartile 1 (75th-100th percentile)	93	121	90	292	214%
Quartile 2 (50th-74th percentile)	60	72	86	170	183%
Quartile 3 (25th-49th percentile)	35	51	41	132	277%
Quartile 4 (0-24th percentile)	18	28	27	63	250%
Total	206	272	244	657	219%

Table 17 shows that 10 CTA companies were responsible for most of the complaints about abusive marketing tactics reported to CAB during 2025. Wave Energy, United Energy Trading have the most complaints and a substantial marketing presence in the most vulnerable communities. Spark Energy Gas, Big Tree Energy, and AAA Natural Gas have fewer complaints, but they have a larger percentage of their total complaints coming from the most vulnerable consumer group, Quartile 1.

Table 17: CTAs in the Most Disadvantaged ESJ Communities with Most Abusive Marketing Complaints

Utility Name	Total Contacts Count	Total Abusive Marketing Contacts	% Abusive Marketing Contacts	Quartile 1 Contact Count	Quartile 1 Abusive Marketing Count	Quartile 1 Abusive Marketing Contacts
Wave Energy LLC	246	151	61%	87	59	68%
United Energy Trading LLC dba Collective Energy	202	104	51%	104	60	58%
SFE Energy Inc.	163	102	63%	68	49	72%
Spark Energy Gas LLC	93	60	65%	39	29	74%
Big Tree Energy CA, LLC	89	51	57%	29	17	59%
AAA Natural Gas	87	61	70%	25	19	76%
Statewise Energy California LLC	75	43	57%	37	26	70%
Vista Energy Marketing LP	63	41	65%	29	21	72%
Greenwave Energy LLC (Parent Company: United Energy Trading LLC)	42	23	55%	15	6	40%
Peak Six Power and Gas LLC	17	12	71%	6	4	67%
Total Top 10 CTA Companies	1,077	648	60%	439	290	66%

Table 18 shows the number of CTA related informal complaints by their final disposition. Over **three-quarters (76%)** of these ICs closed in favor of the consumer, confirming that, in most cases, consumers had a legitimate case against their CTA company. In comparison, only **41 percent** of all ICs closed in favor of the consumer. Therefore, consumer complaints against CTAs were almost **twice as likely** to be upheld compared to the average complaint received by CAB, highlighting a pattern of abusive behavior in the CTA sector.

Table 18: CTA Abusive Marketing Informal Complaints Closed During Q1-2025

Case Disposition	Count	%
Discretion of Utility	2	1%
In Consumer's Favor	121	76%
In Favor of Utility	37	23%
Total Closed Abusive Marketing ICs	160	100%

TEAM and CHANGES

In addition to handling consumer contacts, CAB also oversees two important programs: the Telecommunications Education and Assistance in Multiple-Languages ([TEAM](#)) and Community Help and Awareness of Natural Gas and Electric Services ([CHANGES](#)) programs. These programs assist Limited English Proficient (LEP) consumers with telecommunications and energy issues, respectively.

TEAM and CHANGES support LEP utility consumers statewide through **25** Community-based Organizations (CBOs) that offer services in their preferred language, and with cultural sensitivity. CHANGES CBOs are specifically trained to advocate for consumers through the program's three service components: individual case assistance, education, and outreach.

Individual case assistance responds most frequently to clients' financial challenges in paying for their services or resolving disputes with their providers.

CBOs also offer education classes on a range of topics to assist them in managing their utility services. Classes are provided either on CBO premises or in nearby facilities within the same community.

Outreach is conducted by promoting the program at community events and through various media types. The most recent TEAM and CHANGES contract was awarded to the non-profit organization International Institute of Los Angeles (IILA) from July 2024 to June 2027.⁴⁶ TEAM is authorized to receive an annual budget of up to **\$1.6 million**, and CHANGES is authorized for up to **\$1.75 million** annually.

What TEAM and CHANGES Clients Were Contacting CBOs About in Q1-2025

CHANGES

CHANGES CBOs have already resolved **2,767** client cases in this very active first quarter. This represents **44%** of the 2024 yearly caseload.

Table 19 shows that the Top 10 case issues accounted for over half of all the quarter's resolved cases. A significant **39%** of these cases stemmed from clients experiencing financial hardship, categorized as "Needs Referral for Assistance Programs" (**20%**) and "Unable to Pay Balance Due" (**19%**). This was followed by "Pending Disconnection" at **8%**. "High Bill" (**3%**) was the next common reason for client assistance provided by CBOs. Clients also frequently sought assistance with "Electric Aggregation," "Gas Aggregation," "Account Setup/Changes," and "Other Payment Assistance."

⁴⁶ The full list of CBO's is here: [TEAM & CHANGES CBO Roster](#)

Table 19: CHANGES Client Issues in Q1-2025

CHANGES Program Closed Cases		
Q1-2025 Total Closed Cases	2,767	100%
Top 10 Case Issues		
Case Issue Type	Case Count	% of Totals
Needs Referral for Assistance Programs	543	20%
Unable to Pay Balance Due	533	19%
Pending Disconnection	220	8%
High Bill	80	3%
Electric Aggregation	63	2%
Gas Aggregation	38	1%
New Account Set-Up	29	1%
Other Payment Assistance (e.g., church, private company)	24	1%
Customer Service Problems	22	1%
Assist with Changes to Account	20	1%
Total	1,374	57%

TEAM

TEAM CBOs successfully closed **823** client cases, recovering **\$20,195** for consumers by resolving their telecommunications disputes. Unlike the case issues observed with CHANGES, the TEAM complaint data reflects fewer issues related to financial hardship or difficulty paying bills. Instead, the TEAM client contacts primarily involved assisting with other types of case issues.

Table 20 provides a detailed breakdown of the Top 10 case issues, which represent **78%** of all resolved TEAM cases. Notably, **18%** of clients contacted CBOs to “Assist with Changes to Account”, **14%** for “High Bills”, **10%** to “Assist with Phone Activation”. LifeLine-related issues were **7%** of client contacts, and **6%** of these were each related to “Expired Promotion”, “Add New Internet Service/Plan” and problematic phone coverage.

Table 20: TEAM Client Issues in Q1-2025

TEAM Program Closed Cases		
Q1-2025 Closed Cases	823	100%
Top 10 Case Issues		
Case Issue Type	Case Count	% of Totals
Assist with Changes to Account	148	18%
High Bill	115	14%
Assist with Phone Activation	83	10%
Expired Promotion	50	6%
Add New Internet Service/Plan	50	6%
Poor Coverage / Drop calls / No Coverage	48	6%
Wildfire-related issue	38	5%
Set Up New Account	33	4%
LifeLine Recertification	32	4%
LifeLine Enrollment	26	3%
Total for Closed Cases (Top 10 by Issue Type)	623	76%