

# Consumer Affairs Branch

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YEAR IN REVIEW – 2024

February 24, 2025



**California Public  
Utilities Commission**

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# About This Report

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

Unless otherwise noted, the data presented in this report are based on inquiries and complaints received by the Consumer Affairs Branch (CAB) from January through December 2024.

## This Report Details 2024 Highlights:

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CAB Returned \$5,024,044 to Consumers in 2024

CAB Received 43,779 Consumer Contacts

CAB Assisted 9,549 Consumers Resolve Complaints

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## About The Consumer Affairs Branch

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

- Resolves consumer questions or complaints about their regulated telecommunications, natural gas, electricity, and water utility services.
- Resolves appeals for California LifeLine, a discounted phone program.
- Administers Limited English Proficiency (LEP) programs that assist consumers with telecommunications and energy issues.
- Analyzes contact data to assist CPUC decision-makers, supports enforcement against fraud and abuse, and informs the public.

# 2024 Highlights

## Consumer Refunds – CAB Returned \$5,024,044 to Consumers in 2024

During 2024, consumers were reimbursed **\$5,024,044** from the utilities by contacting CAB and utilizing the Informal Complaint (IC) process. An IC is a written consumer contact expressing dissatisfaction with, or a dispute with an action or practice regulated through tariffs, rules, orders, or any other form of authority that originates from the California Public Utilities Commission (CPUC).<sup>1</sup>

**Table 1** indicates a substantial Energy refund total in Q2. This was caused by a single refund from Southern California Edison of **\$1,400,608**.

Table 1: Consumer Refunds by Industry<sup>2</sup> and Quarter

Industry	Q1 2024	Q2 2024	Q3 2024	Q4 2024	2024 Totals
Energy	\$1,091,153	\$2,502,211	\$461,944	\$328,085	\$4,383,393
Telecommunications	\$143,155	\$132,964	\$186,980	\$122,072	\$585,171
Transportation	\$172	\$99	\$35	\$10	\$316
Water	\$16,391	\$3,972	\$12,706	\$22,095	\$55,164
<b>Total</b>	<b>\$1,250,871</b>	<b>\$2,639,246</b>	<b>\$661,665</b>	<b>\$472,262</b>	<b>\$5,024,044</b>

**Table 2** highlights the average amount refunded from the utility to the consumer in 2024 by industry: Energy **\$3,934**, Telecommunications **\$476**, Transportation **\$49**, and Water **\$778**. Many of the refunds resulted from incorrect billing and were disbursed by the utility following CAB’s involvement. A notable case was when a consumer was incorrectly billed \$22,103.73 for roaming charges after confirming with AT&T that an International Day Pass had been added to their plan. After months of unfulfilled promises by the utility, CAB facilitated a reversal of charges and refund of \$21,661 to the consumer.

Table 2: 2024 Consumer Refund Statistics

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

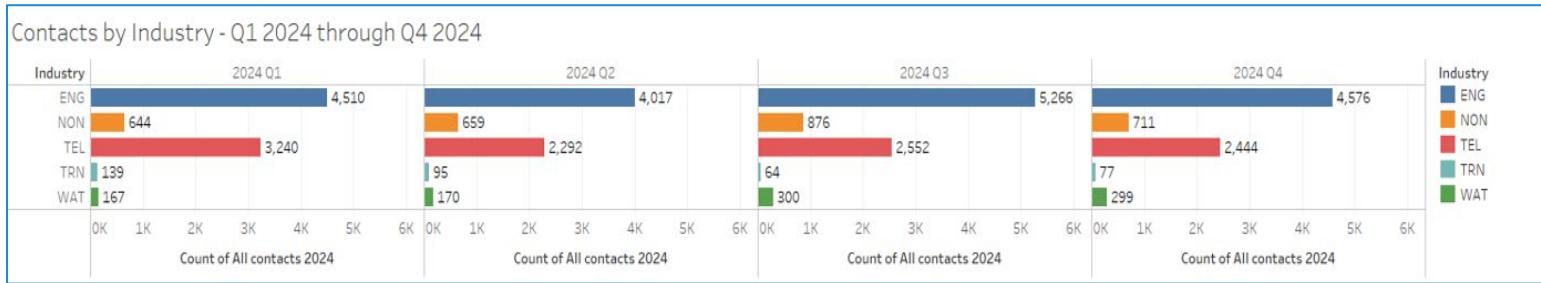
<sup>2</sup> This table only accounts for refunds through the IC process. Cases where a phone contact was transferred to a utility for expedited resolution are not reflected here.

Industry	Count of Refunds	Avg. Refund Amount	Min. Refund Amount	Max. Refund Amount
Energy	\$1,117	\$3,934	\$0.20	\$1,400,608
Telecommunication	\$663	\$476	\$0.80	\$21,661
Transportation	\$8	\$49	\$9	\$163
Water	\$71	\$778	\$2	\$9,783
<b>Total</b>	<b>\$1,859</b>	<b>\$5,237</b>	<b>N/A</b>	<b>N/A</b>

## CAB Received 43,779 Consumer Contacts in 2024

Figure 1 shows CAB’s representatives are responsible for assisting consumers with answering questions and resolving disputes with their utility providers. These contacts are received via phone, mail, email, or website complaint forms. In 2024, CAB received **43,779** contacts<sup>3</sup>.

Figure 1: Consumer Contacts by Industry and Quarter



## CAB Assisted 9,549 Consumers Resolve Informal Complaints in 2024

CAB’s IC process provides consumers with an easily accessible way to resolve disputes with their utility.

Table 3 shows the distribution of resolved ICs across regulated industries. In 2024, CAB resolved **9,549** ICs. Of the ICs closed in 2024, **66 percent** were Energy ICs, **31 percent** were Telecommunications ICs, **less than 1 percent** were Transportation ICs, and **3 percent** were Water ICs.

<sup>3</sup> For the purposes of this report, “Total Contacts” is calculated as all contacts received during the period excluding contacts to CAB where the category is “Unknown,” caller not online, wrong number, where the industry is unknown if the analysis is by industry, or the utility is unknown if the analysis is by a utility company.

Table 3: Informal Consumer Complaints Resolved by Industry and Quarter

Industry	2024 Q1	2024 Q2	2024 Q3	2024 Q4	2024 % of Total
Energy	1,574	1,449	1,718	1,586	66%
Telecommunication	753	641	848	682	31%
Transportation	7	8	-	-	<1%
Water	67	58	78	80	3%
<b>Total</b>	<b>2,401</b>	<b>2,156</b>	<b>2,644</b>	<b>2,348</b>	<b>100%</b>

## Energy Utilities Recap with 2024 Highlights

This report reviews consumer contacts CAB received in 2024 for all energy utilities, specifically the Top-5 utilities. Being a member of the Top-5 means that CAB received the most contacts for these companies compared to all other energy companies regulated by the CPUC.

### Energy Consumer Contacts 2024

CAB received **18,262** contacts related to energy utility companies in 2024. The Top-5 energy utilities accounted for **90 percent** of total energy contacts. Most of the contacts were from Southern California Edison (SCE) customers and Pacific Gas and Electric (PG&E) customers, accounting for **48 percent** and **30 percent** of contacts, respectively. Most contacts were related to High Bills, Non-Jurisdictional Customer Service<sup>4</sup>, Disconnection Non-payment, Payment Arrangements, and Abusive Marketing.

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<sup>4</sup> NJ Customer Service subcategory applies to customer service-related issues such as being transferred from one person to another multiple times within one phone call, not being able to reach the correct department or someone who could deal with the issue, and rude utility representatives.

**Table 4** gives a breakout of the Top-5 Energy Utilities by count and percentage of the total.

Table 4: Top-5 Energy Utilities Contact Statistics

Contacts and Top-5 Utilities	2024				Total	% of Total
	Q1	Q2	Q3	Q4		
<b>Total Energy Contacts</b>					<b>18,262</b>	<b>100%</b>
<b>Top-5 Energy Utilities Contacts</b>						
Southern California Edison Company	2,012	1,900	2,664	2,166	8,736	48%
Pacific Gas & Electric Company	1,411	1,186	1,534	1,357	5,478	30%
San Diego Gas & Electric Company	218	190	272	246	926	5%
Southern California Gas Company	204	268	191	173	830	5%
SFE Energy Inc.	90	113	163	104	470	3%
<b>Total Top-5 Energy Utilities Contacts</b>	<b>3,935</b>	<b>3,640</b>	<b>4,819</b>	<b>4,046</b>	<b>16,440</b>	<b>90%</b>

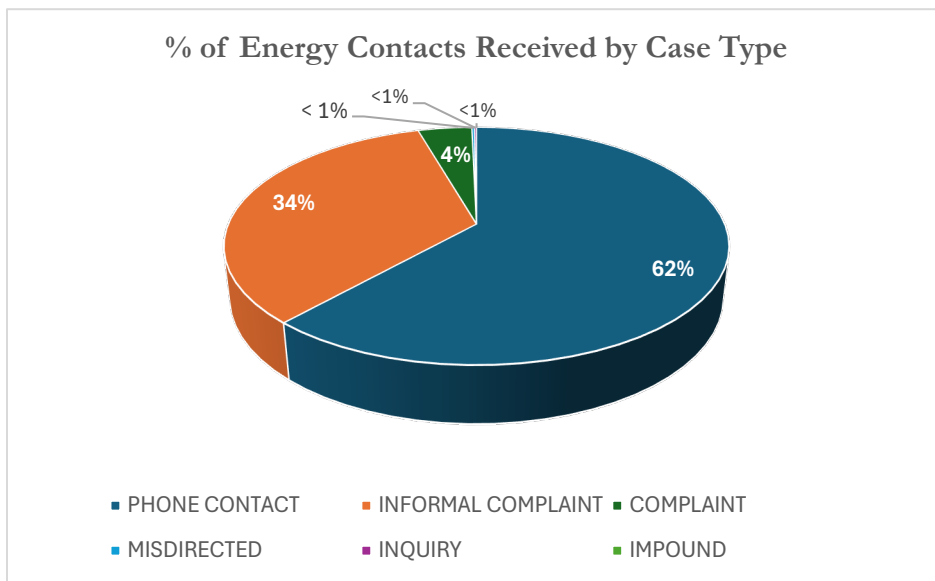
Furthermore, **Figure 2** shows the relative impact of CAB’s workload by volume of energy contacts. In 2024, most of CAB’s staff resources were allocated to handling Phone Contacts, most of which were SCE customers. The various case types represent different contact resolution processes, with Phone Contacts being the least time intensive, and ICs and Complaints<sup>5</sup> being the most intensive.

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



Figure 2: CAB Energy Work Distribution by Case Type – 2024



**Table 5** shows the ranking of the Top-10 Energy Utilities for 2024 by the number of informal complaints submitted and the average utility response interval. When CAB sends an IC to a utility, the expectation is that the utility will respond to CAB within **20 business days** to resolve the IC.

StateWise Energy California LLC, a Core Transport Aggregator (CTA), and Liberty Utilities both had the largest average utility response interval of **26 days**. In contrast, SCE and PG&E, who accounted for the largest number of informal complaints, responded to **1,431** and **1,126** ICs with an average response interval of only **15** and **9 calendar days**, respectively.

Table 5: Top-10 Energy Utilities by Case Count and Utility Response Times – 2024

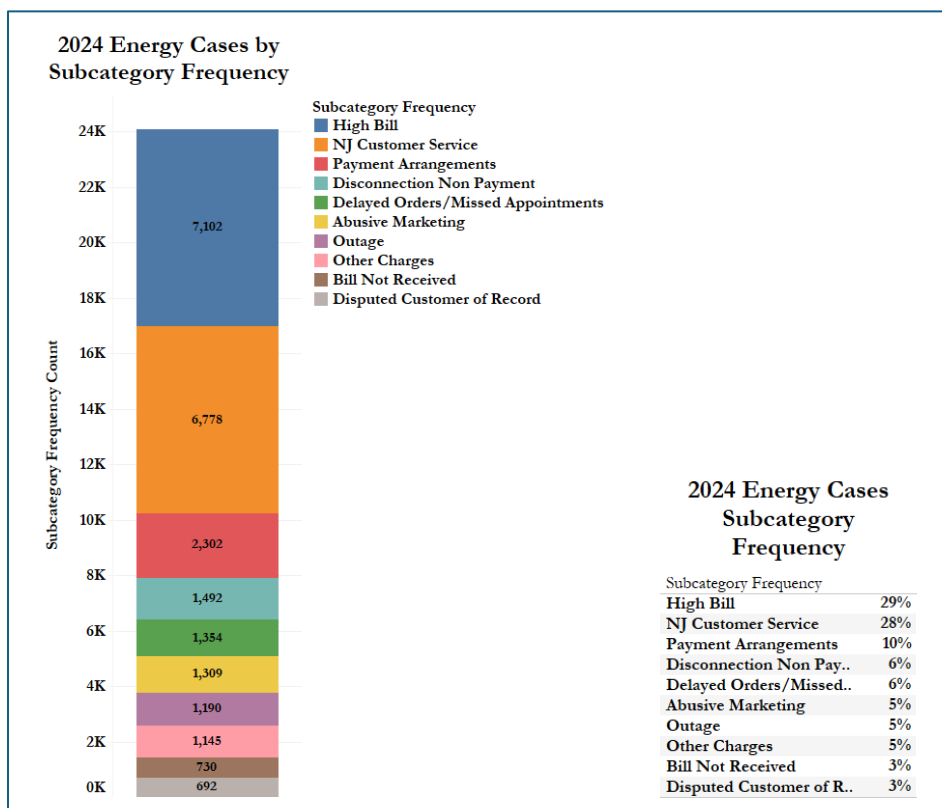
Utility	Count of Case Responses	Average Response Time (No. of Days)
StateWise Energy California LLC	44	26
Liberty Utilities (CalPeco Electric) LLC	43	26
SFE Energy Inc.	82	24
Southern California Gas Company	130	20
San Diego Gas & Electric Company	234	17
Southern California Edison Company	1,431	15
Big Tree Energy CA, LLC	26	12
United Energy Trading LLC dba Collective Energy	24	12
Pacific Gas & Electric Company	1,126	9
Wave Energy LLC	44	6
<b>Total</b>	<b>3,184</b>	<b>17</b>

## Top-10 Subcategories for Energy Companies for 2024

Typically, when CAB reports case data by subcategory, we count cases and group them by “primary subcategory.” The primary subcategory is the first subcategory attributed to the complaint, representing why the consumer contacted CAB. However, CAB’s Consumer Information Management System (CIMS) database permits the selection of multiple subcategories to a case (attributes), allowing for a better description of the case and subsequent in-depth analysis.

**Figure 3** represents the number of times an individual subcategory was selected in 2024. The High Bill subcategory was applied to **29 percent** of all contacts, followed by Non- Jurisdictional Customer Service and Payment Arrangements, which were applied to **28 percent** and **10 percent**, respectively.

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



## Telecommunications Utilities 2024 Annual Review & Quarterly Highlights

In 2024, CAB handled **9,032** telecommunications-related contacts, excluding LifeLine contacts, with **71 percent** assigned to the Top-5 utilities. Notably, in the first quarter of 2024, AT&T California experienced a surge, accounting for **34 percent** of all telecommunications contacts received.

**Table 6** provides a detailed summary of the total number and percentage of these contacts received by the Top-5 telecommunication utilities in 2024. Further analysis of AT&T’s contacts below highlights some reasons for the surge in complaints received.

Table 6: Telecommunication Utility Contacts and Top-5 Contacts in 2024

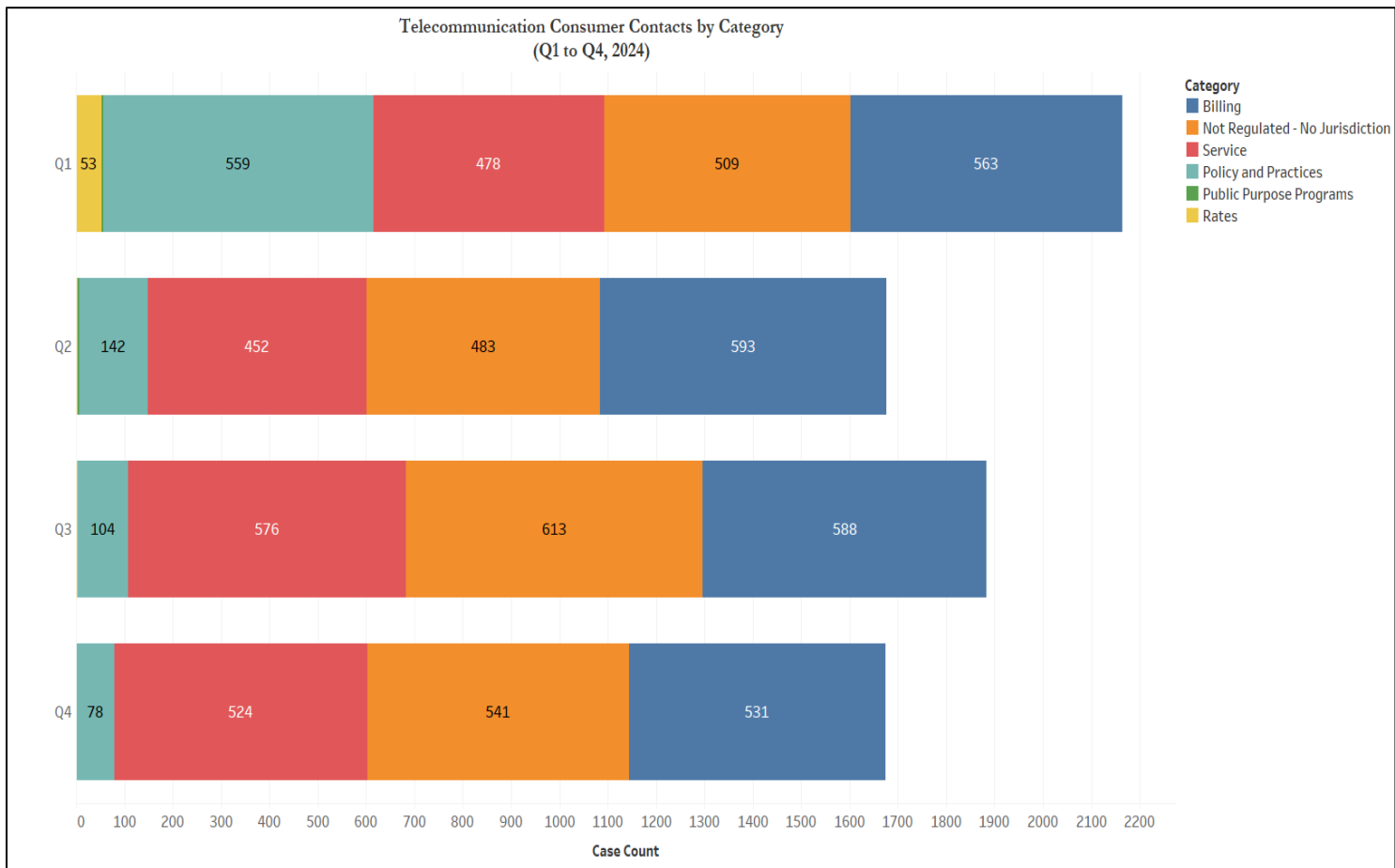
Telecommunications Contacts	Q1 2024	Q2 2024	Q3 2024	Q4 2024	2024 Total	% of Total
Total Telecommunications Contacts	2,488	2,038	2,358	2,139	9,023	100%
<b>Top-5 Telecommunications Contacts</b>						
AT&T California	1,093	620	692	649	3,054	34%
Frontier California Inc.	225	307	356	293	1,181	13%
Comcast Phone of California	154	191	264	209	818	9%
Charter Fiberlink CA-CCO, LLC	90	170	242	183	685	8%
Cellco Partnership <sup>6</sup>	118	123	175	235	651	7%
<b>Total Top-5 Telecommunications Contacts</b>	<b>1,680</b>	<b>1,411</b>	<b>1,729</b>	<b>1,569</b>	<b>6,389</b>	<b>71%</b>

**Figure 4** shows the categories of consumer complaints to the CPUC, with consistent trends except for the Policy & Practice category in Q1 2024. Of the **559** contacts in this category, **512** were related to AT&T California's request to be relieved from the Carrier of Last Resort obligation<sup>7</sup>.

<sup>6</sup> Cellco Partnership is also known as Verizon Wireless.

<sup>7</sup> 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. On June 28, 2024, the CPUC following extensive public input, has rejected AT&T’s request to withdraw as a carrier of last resort (COLR) and opened a new Rulemaking process to address COLR telecommunications service obligations.

Figure 4: Telecommunication Utility Contacts by Category in 2024



**Table 7** highlights subcategory frequency for the Top-5 telecommunications utilities in 2024, highlighting notable patterns and trends. Complaints related to commission policy and rules, mainly driven by AT&T, dropped significantly after Q1 2024 from **521** cases to **75** cases in Q2 2024. Common issues across utilities include Non-Jurisdictional Customer Service, Outages, Delayed Orders/Missed Appointments, and High Bill, reflecting shared challenges in the sector.

Outage complaints are particularly significant, signaling service disruptions and a need for improved reliability. AT&T California, followed by Frontier California Inc., leads in complaints related to Outages, High Bills, and Delayed Orders/Missed Appointments, suggesting areas for targeted improvements to enhance customer experience and service reliability.

Table 7: Top-10 Subcategory Frequency for Top-5 Telecommunications Utilities (2024)

Top-10 Subcategories Frequency for Top-5 Telecommunications Contacts					
Top-10 Subcategories Frequency	Q1 2024	Q2 2024	Q3 2024	Q4 2024	2024 Total
NJ Customer Service	448	440	516	425	1,829
Outage	278	225	334	310	1,147
NJ Internet Billing/Service/Equipment	253	163	266	251	933
Delayed Orders/Missed Appointments	183	171	256	215	825
High Bill	178	173	241	221	813
Commission Policy/Rules	524	76	27	13	640
Other Charges	151	169	149	135	604
NJ Cable/Satellite TV	76	60	94	56	286
Bill Adjustment	36	45	58	57	196
NJ Equipment	48	38	49	42	177
<b>Total for Top-10 Subcategories Frequency</b>	<b>2,175</b>	<b>1,560</b>	<b>1,990</b>	<b>1,725</b>	<b>7,450</b>

## LifeLine

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

**Table 8** summarizes the LifeLine cases received and the top written case types closed during 2024. Of the **1,223** LifeLine Phone Contact cases resolved, **721** were fully resolved, **454** were referred to utilities, and the rest were advised to write to the CPUC. This analysis of LifeLine contacts closed in 2024 emphasizes the vital role of CAB’s effective consumer support and resolution mechanisms in addressing consumer needs and concerns. Moreover, the data also highlights the ongoing trend of LifeLine Phone Contacts, where consumers consistently engage with CAB regarding their LifeLine-related concerns, queries, and complaints.

Table 8: LifeLine Contacts Received and Closed Written Cases (2024)

LifeLine - Contacts Received	Q1	Q2	Q3	Q4	Total	% of Total
Phone Contacts Received	303	279	349	292	1,223	38%
Written Contacts Received	783	369	330	518	2,000	62%
Total LifeLine Contacts Received	1,086	648	679	810	3,223	100%
LifeLine - Closed Written Cases	Q1	Q2	Q3	Q4	Total	% of Total
LifeLine Landline Appeal	274	100	46	276	696	35%
LifeLine Billing	173	131	200	121	625	31%
LifeLine Wireless Appeal	362	83	83	84	612	31%

In 2024, **696** LifeLine Landline Appeal cases comprising **35 percent** of written contacts were closed. LifeLine Landline Appeal cases involve appeals related to LifeLine services provided by landline carriers. The closed contacts showed a V-shaped trend with peaks in the first and fourth quarters, likely due to seasonal factors. LifeLine Billing cases accounted for **625** cases, or **31 percent** of written contacts, and remained steady throughout the year. LifeLine Billing cases involve billing complaints related to LifeLine services. LifeLine Wireless Appeal cases accounted for **615** cases, or **31 percent** of written contacts, and saw a sharp decline from **362** cases in Q1 2024 to **84** cases in Q4 2024. LifeLine Wireless Appeal cases involve appeals related to LifeLine services provided by wireless cell phone carriers.

LifeLine Wireless Appeal, Billing, and Landline Appeal cases comprised **31 to 35 percent** of closed written cases, suggesting shared consumer concerns. Addressing these issues through education, outreach, and process improvements could enhance customer experience and reduce recurring complaints.

Table 9: Top-5 LifeLine Subcategory Frequency (2024)

Top-5 Subcategories Frequency for Top-5 LifeLine Contacts					
Top-5 Subcategories Frequency	Q1 2024	Q2 2024	Q3 2024	Q4 2024	2024 Total
LL Consumer Did Not Return Form	421	85	58	200	764
LLB Federal Program/Equipment	215	118	155	153	641
LL Documents Not Provided/Does Not Meet Guidelines	99	61	57	94	311
NJ Customer Service	58	72	87	48	265
LLB Application Request	88	53	74	34	249
Total Top-5 LifeLine Subcategories (2024)	881	389	431	529	2,230

**Table 9** above shows the subcategory frequency for the Top-5 LifeLine contacts. In 2024, the **LL Consumer Did Not Return Form** was the most common LifeLine subcategory, with **764** cases. The trend shows a significant drop from **421** cases in Q1 to **85** cases in Q2 and **58** cases in Q3, followed by a sharp increase to **200** cases in Q4. This pattern suggests a strong seasonal effect, where filings peak in the first

quarter, likely due to year-end reporting deadlines or regulatory cycles prompting a backlog of cases. The decline in Q2 and Q3 may indicate a lull in reporting activity or processing delays, while the surge in Q4 could reflect organizations rushing to file before annual deadlines. This subcategory applies when forms are not returned, missing household worksheets, or applications are late.

The **LLB Federal Program/Equipment** subcategory ranked second but remained steady, averaging **160** cases per quarter. It involves issues with receiving or replacing free or discounted phones from LifeLine Wireless Carriers.

The **LL Documents Not Provided/Does Not Meet Guideline** subcategory ranked third, with cases peaking at **99** in Q1, dropping to 61 in Q2, 57 in Q3 2024, and rising again to 94 in Q4 2024. This subcategory is also linked to seasonal filing. It is selected when consumers fail to provide required documents or are rejected for not meeting income guidelines.

Other subcategories accounted for less than **8 percent** of cases. The analysis underscores CAB’s critical role in efficiently resolving diverse consumer concerns.

## Environmental Social Justice (ESJ) Consumer Contacts for 2024

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### ESJ Overview

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

The CPUC identifies ESJ communities as:

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

ESJ communities may also include:

- Disadvantaged Communities
- All Tribal Lands
- Low-income households (defined as household incomes below 80 percent of the area median income); and

- Low-income census tracts (defined as census tracts where aggregated household incomes are less than 80 percent of area or state median income)

The CPUC defines Disadvantaged Communities under CalEnviroScreen 4.0 as census tracts that score in the top 25 percentile (75th – 100th percentiles)<sup>8</sup> of CalEnviroScreen 4.0, census tracts and are identified as Disadvantaged Communities.

For this report, CAB identifies ESJ communities using census tracts that score in the top **25 percent** of CalEnviroScreen 4.0 and rolls them up to United States Postal Service (USPS) zip codes. CAB aggregates the census tract data to zip codes to perform GIS analysis on the data utilizing Tableau and ArcGIS software. While CAB’s analysis focuses on the contacts it receives from consumers in the top 25 percentile zip codes, it uses consumer contact data from the other three Quartiles (0-24, 25-49, 50-74 percentiles) in some portions of the ESJ analysis.

## Energy ESJ Highlights

- During 2024, CAB received 4,781 ESJ contacts from consumers in the 75th-100th percentiles, representing an **18 percent** increase in contacts for the zip codes in the 75<sup>th</sup>-100<sup>th</sup> ESJ Percentiles.<sup>9</sup> Throughout 2024, Consumers in the 75<sup>th</sup> to 100<sup>th</sup> ESJ Percentiles cite High Bill and Customer Service as their most significant concern, followed by Payment Arrangements, Disconnection Non-Payment, and Abusive Marketing.
- CAB recorded an overall **40 percent** increase in Disconnection Non-Payment Contacts between 2023 and 2024.
- Complaints against Core Transport Aggregators (CTAs) surged to their highest level since CAB began recording them in 2018. Abusive Marketing is the dominant subcategory.

**Table 10** shows the upward trend of energy-related contacts from consumers who live in zip codes where their ESJ Percentile is calculated between 75 and 100, otherwise defined as Disadvantaged Communities throughout this section. Complaints in these disadvantaged communities exhibit an 18 percent increase over the previous year.

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<sup>8</sup> The higher the percentile number, the greater the impact of the measure on the affected geographic area.

<sup>9</sup> ESJ contact counts are always a little squishy 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 10: Energy ESJ Contacts 75th - 100th Percentile, 2023 to 2024.

	2023 Count	2024 Count	% Increase
Total Contacts 75th-100th Percentile	3,888	4,753	18%

## What Consumers in the Most Disadvantaged Communities Complain About

**Table 11** illustrates the subcategory frequency (the number of times a subcategory was chosen to describe consumer contacts expressed as a percentage) for consumer contacts in the most disadvantaged communities. During 2024, High Bills and Customer Service complaints dominate consumers in the most underprivileged communities. Further reflecting these consumers’ economic stress Payment Arrangements and Disconnection Non-Payment follow as the two most frequent subcategories chosen. Energy industry complaints related to Abusive Marketing congeal around the CTAs are the subject of additional analysis later in this report.

Table 11: Subcategory Frequency – Top-10 Subcategories in the most disadvantaged communities.

Subcategory	Count of Subcategory Selection	Percent
High Bill	1,932	29%
NJ Customer Service	1,611	24%
Payment Arrangements	886	13%
Disconnection Non-Payment	639	10%
Abusive Marketing	480	7%
Other Charges	274	4%
Delayed Orders/Missed Appointments	238	4%
Disputed Customer of Record	213	3%
Bill Not Received	166	3%
Outage	157	2%
<b>Grand Total</b>	<b>6,596</b>	<b>100%</b>

## Disconnection Non-Payment Contacts

**Table 12** illustrates that Disconnection Non-Payment (DNP) contacts increased by **40 percent** between 2023 and 2024 for all ESJ Quartiles combined. The most disadvantaged communities experienced a substantial **47 percent** increase in total contacts and led the next highest quartile by 22 percent of 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 12: 2024 Energy Disconnection Non-Payment Contacts in all ESJ Quartiles

ESJ Percentile/Quartile	2023	2024	Quartile % of Total 2024	% Increase 2023-2024
75-100	434	639	48%	47%
50-74	263	355	26%	35%
25-49	175	214	16%	22%
0-24	88	140	10%	59%
<b>Total</b>	<b>960</b>	<b>1,348</b>	<b>100%</b>	<b>40%</b>

## Core Transport Agents and Abusive Marketing Complaints

CTAs are non-utility gas suppliers who purchase gas for residential and small commercial end-use customers. Suppose a consumer elects to take CTA service from one of the many 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 a consumer's billing option, the consumer 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<sup>10</sup>.

2024 witnessed a continued sharp increase in complaints to CTAs, rising to their highest level since 2018 when CAB began collecting complaint data against CTAs. **Table 13** below shows the annual count of CTA contacts by year. 2024 has the highest number of consumer contacts complaining about CTA behavior since CAB began collecting data in 2018.

Table 13: All CTA Related Contacts 2018-2024

Year	2018	2019	2020	2021	2022	2023	2024
<b>Count CTA Contacts</b>	478	1,454	1,280	1,298	661	1,586	1,821

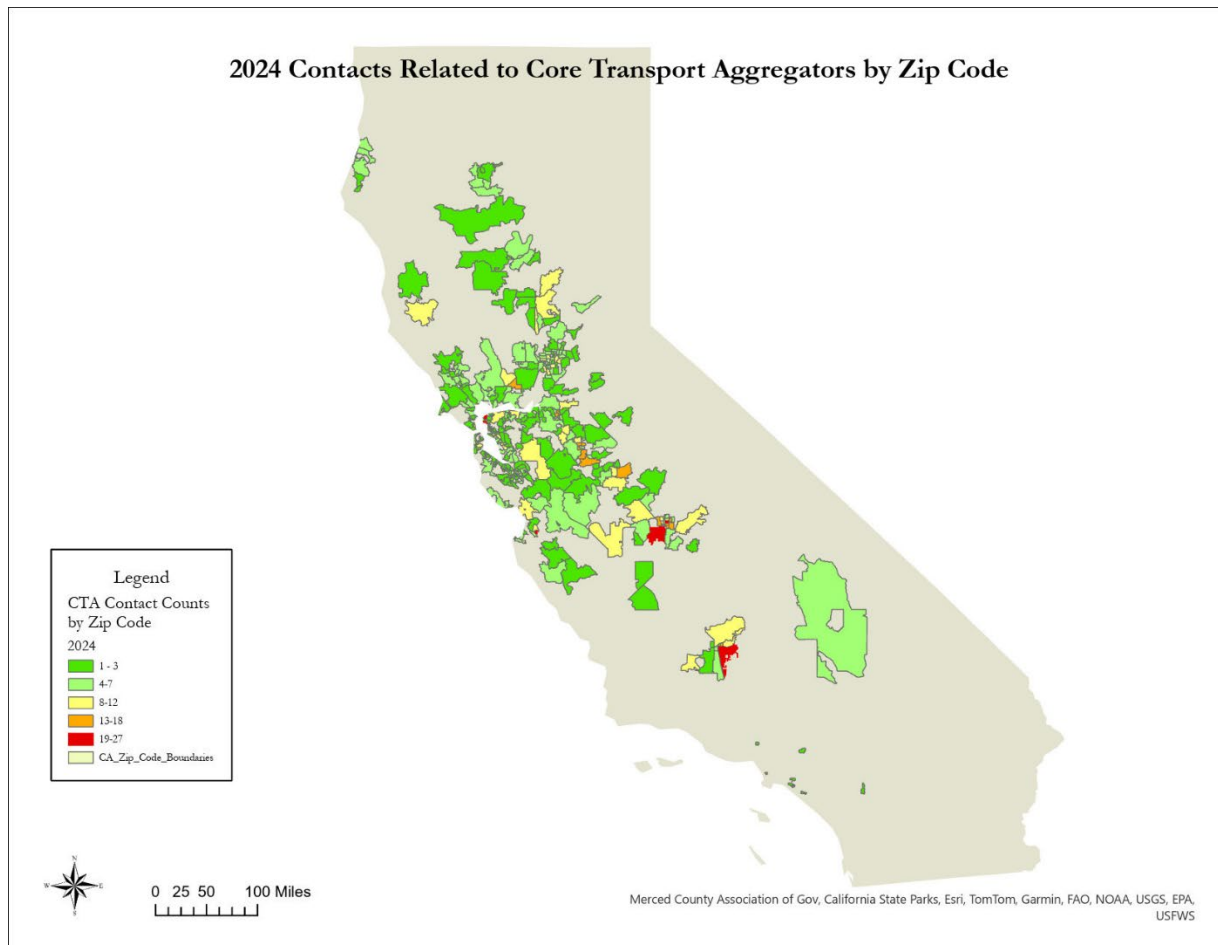
**Figure 5** below shows the 2024 CTA geographic distribution and contact counts by zip code. The footprint is clustered in the Central and San Joaquin Valleys and the San Francisco Bay area. Practically no complaints

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<sup>10</sup> 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. The following is a preliminary analysis of Abusive Marketing contacts that are related to CTAs.

were generated in southern California, but the heaviest concentrations of complaints are in the San Joaquin Valley.

Figure 5: 2024 CTA Contacts by Zip Code



CTAs have been accused of defrauding customers, especially vulnerable groups such as the elderly, non-English speakers, and low-income Californians. In CAB’s previous quarterly report<sup>11</sup>, we examined abusive marketing complaints against the CTAs to determine whether specific demographic groups were targeted for aggressive and/or fraudulent marketing campaigns. In that report, CAB found that most abusive marketing contacts came from the most disadvantaged communities and were responsible for the largest geographic footprint in terms of several zip codes from consumer contacts. The demographics that represent the most disadvantaged communities' zip codes are predominantly Hispanic and/or African

<sup>11</sup> The [CAB Q1 2024](#) and [CAB Q2 2024](#) reports examined abusive marketing complaints against CTAs.

American, with median household usually less than half of the statewide median income, low educational achievement, and experiencing higher than average levels of linguistic isolation.

**Table 14** below shows a history of consumer contacts where Abusive Marketing is the primary subcategory (Subcategory 1) related to the case. In CAB’s database, the primary category is supposed to represent why the consumer contacted CAB. Also, the primary subcategory is the main driver of an IC. The chart below shows that Abusive Marketing complaints against CTAs have been ongoing since 2018. In 2024, the Utility Enforcement Branch (UEB) issued 16 citations to CTAs for “failure to provide proof of enrollment authorization.” Issuing citations to CTAs on abusive marketing complaints requires the complaints’ cooperation, which may be challenging due to the targeted groups' demographic makeup.

Table 14: Consumer Contacts About CTAs Where Abusive Marketing is Subcategory 1 in all 4 ESJ Quartiles<sup>12</sup>

Quartile/Percentile	2018	2019	2020	2021	2022	2023	2024
Quartile 1 (75th-100th Pctl.)	109	348	269	279	159	257	408
Quartile 2 (50th-74th Pctl.)	94	237	203	292	124	158	283
Quartile 3 (25th-49th Pctl.)	41	135	178	169	37	132	181
Quartile 4 (0-24th Pctl.)	34	69	93	93	47	79	114
<b>Total 4 Quartiles</b>	<b>278</b>	<b>789</b>	<b>743</b>	<b>833</b>	<b>367</b>	<b>626</b>	<b>986</b>

**Table 15** below contains a list of the Top-6 CTAs where complaints of abusive marketing tactics were reported to CAB during 2024 and are in the database as Subcategory 1 in the most disadvantaged ESJ community zip codes. With two exceptions, all CTAs listed in the table below display substantial increases in abusive marketing complaints within the zip codes. CTAs compete for business in most zip codes, representing the most disadvantaged ESJ communities and their related demographics, as described in this report.

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<sup>12</sup> Quartile 1 is the most disadvantaged communities and quartile 4 the most advantaged communities according to ESJ definitions.

Table 15: Top-6 CTAs in the Most Disadvantaged ESJ Communities for Abusive Marketing Complaints

Utility Name	2023	2024	% Change 2023-2024
SFE Energy Inc.	52	116	123%
Wave Energy LLC	10	70	600%
StateWise Energy California LLC	13	62	377%
United Energy Trading LLC dba Collective Energy	52	54	4%
Vista Energy Marketing L.P.	33	31	-6%
AAA Natural Gas	20	28	40%
<b>Totals</b>	<b>180</b>	<b>361</b>	<b>101%</b>

**Table 16** below lists the Top-5 subcategories where consumers communicated their issues with the CTA. Cases can have more than one subcategory attributed to them, and Subcategory 1 is considered the “primary subcategory.” The primary subcategory reflects the consumer’s overriding issue prompting the complaint. The overarching issue for consumers is the abusive marketing tactics of the CTAs in their door-to-door sales campaigns in disadvantaged neighborhoods. Based on a review of cases in our CIMS database, we have found this to be a common trend in 2024, with the top 5 categories in Table 16 supporting anecdotal evidence we are seeing from our customers in CIMS. Based on customer complaints, what we are gathering is the following sequence of events:

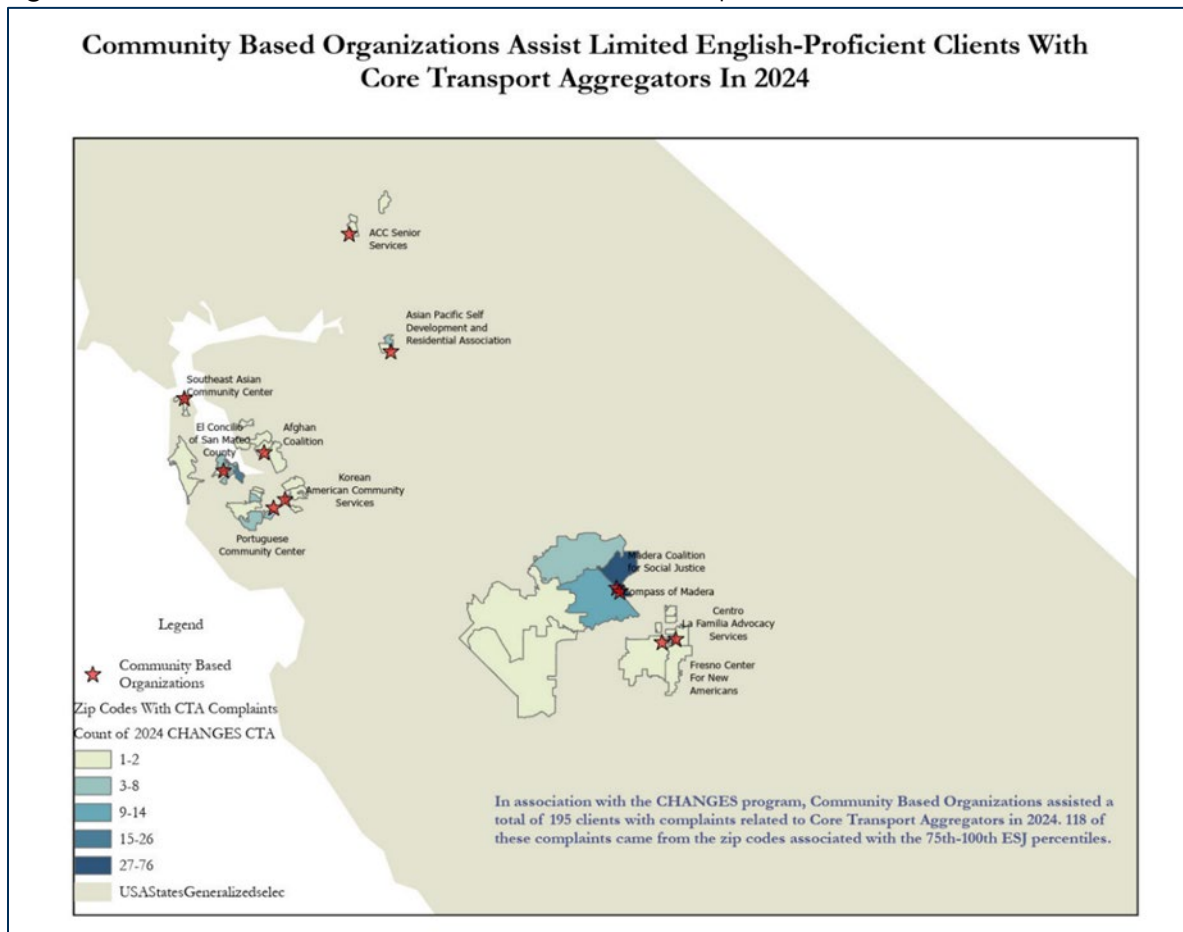
- First, the door-to-door marketing campaigns soliciting consumers with promises of lower rates and overall bills. Additional charges that are added to the bills are not mentioned. The consumer may be turned into a customer with or without the customer’s consent at the door.
- Second, the first bill 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 they were not made aware of at the point of sale.
- Third, 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: Top-5 Subcategories for CTA Complaints in the Most Disadvantaged Communities in 2024

Top-5 Subcategories	Count
Abusive Marketing	408
High Bill	134
Other Charges	48
Early Termination Fee - ETF	32
Delayed Orders/Missed Appointments	26
<b>Total from 75th-100th Percentile</b>	<b>648</b>

**Figure 6** below shows the geographic footprint of complaints against CTAs handled by the CHANGES program. The CPUC's CHANGES (Community Help and Awareness of Natural Gas and Electric Services) program provides services to Limited English Proficient (LEP) consumers who need help with energy issues. The program provides consumer education, case assistance, and program outreach. More information about CHANGES and TEAM programs is in the following section.

Figure 6: CHANGES CBOs Assist Clients with CTA Complaints



In 2024, participating CBOs assisted 195 clients with issues related to CTAs. Almost all clients wanted to cancel their service with the CTAs, and over half of them reported fraudulently becoming customers. When they tried to cancel, they faced high early termination fees.

“This upset client came to my office asking for help removing a third-party gas company from her bill. She stated she never agreed to have any other company besides PG&E. She doesn't recall signing any contract. The client doesn't know how to read or write. She was willing to cancel, called PG&E, and was told they could not do it. I called the State Wise Energy company, CSR Luz. She said the client has a 5-year contract, and if she wants to

cancel, she should pay a \$352.50 fee for early cancellation. The client was really upset with the company because she never agreed to have their services.”

## TEAM and CHANGES

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

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 culturally trained to advocate for consumers through the program’s three service components: individual case assistance, education, and outreach. Individual case assistance cases often respond to a client’s billing disputes or a need for support with applying for bill reduction programs. Education classes are provided either on CBO premises or in nearby facilities within the same community. Outreach is mainly conducted by promoting the program at community events or through various media. CBOs also offer education on a range of topics to assist them in managing their utility services. The TEAM program helped consumers resolve disputes with their telecommunications provider.

The most recent TEAM and CHANGES contract was awarded to the non-profit organization International Institute of Los Angeles (IILA) from July 1, 2024, to June 2027. TEAM is authorized for 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 2024

During 2024, economic hardship dominated the CHANGES data as CBOs closed **6,342** client cases concerning energy utility issues.

In **Table 17** below, the Top-10 case issues resolved accounted for **99 percent** of total closed cases. **80 percent** of CHANGES closed cases consisted of complaints about difficulty paying energy bills and the need for referrals to other sources to help pay their utility bills. Another **7 percent** cited high bills as their reason for contacting the CBO. Clients who needed assistance setting up and making changes to their accounts, had complaints related to CTAs or other issues make up the remainder of the cases.

Earlier in this report, we mentioned how both CIMS and CHANGES data show that CTAs tend to target low-income and limited English-speaking consumers.

Table 17: CHANGES Client Issues in 2024

2024 CHANGES Program Closed Cases		
2024 Closed Cases	6,342	100%
Top-10 Case Issues		
Case Issues Name	Case Count	% of Totals
Unable to Pay Balance Due	3,420	54%
Needs referral for assistance programs	1,532	24%
High Bill	466	7%
New Account Set-Up	267	4%
Assist with Changes to Account	185	3%
Gas Aggregation	136	2%
Other Payment Assistance (church, private company, etc.)	102	2%
Electric Aggregation	70	1%
Pending Disconnection	50	1%
Customer Service Problem	30	<1%
<b>Total for Top-10 Closed Cases</b>	<b>6,258</b>	<b>99%</b>

TEAM CBOs closed **3,276** client cases in 2024. This represents **3,066** fewer than the number of cases CHANGES CBOs closed in 2024. Furthermore, when compared to CHANGES data, TEAM complaint data does not reflect as many economic hardships conditions. Instead, TEAM client contacts are mainly related to account management, activating phones, and the Federal Communications Commission’s Affordable Connectivity Program.

**In Table 18**, the Top-10 case issues resolved accounted for **84 percent** of total closed cases. **10 percent** of client contacts were LifeLine-related, and **15 percent** were Internet-related. **13 percent** of clients contacted CBOs about high bills.



Table 18: TEAM Client Issues in 2024

2024 TEAM Program Closed Cases		
2024 Closed Cases	3,276	100%
Top-10 Case Issues		
Case Issues Name	Case Count	% of Totals
Assisted With Changes to Account	604	18%
Assist with Phone Activation	462	14%
High Bill	438	13%
FCC Affordable Connectivity Program	252	8%
Add new internet service/plan	220	7%
Cramming	189	6%
Set Up New Account	170	5%
LifeLine Enrollment	167	5%
LifeLine Recertification	148	5%
Assisted Client with Paying Bill	113	3%
<b>Total for Top-10 Closed Cases</b>	<b>2,763</b>	<b>84%</b>

Finally, the TEAM program helped consumers resolve disputes with their telecommunications provider, resulting in reclaiming almost **\$127,070** on their behalf in 2024.