

Consumer Affairs Branch

SECOND QUARTER REPORT – 2024

September 24, 2024



**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 April through June 2024.

This Report Details Q2-2024 Highlights:

- CAB Returned More Than \$2,643,119 to Consumers in the Q2-2024
- CAB Received 7,209 Consumer Contacts
- CAB Assisted About 2,082 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, electric, and water utility services.
- Resolves appeals for California LifeLine, a discounted phone program.
- Administers Limited English Proficiency (LEP) programs that assist consumers with telecommunications and energy issues.
- Analyzes contact data to assist CPUC decision-makers, supports enforcement against fraud and abuse, and informs the public.

Q2 2024 Highlights

Consumer Refunds – CAB Returned \$2,643,119 to Consumers

During Q2-2024, consumers were reimbursed **\$2,643,119** 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 that is regulated through tariffs, rules, orders, or any other form of authority that originates from the California Public Utilities Commission (CPUC).¹

Table 1 indicates a consistent increase in total refunds over the past four quarters, suggesting a noteworthy trend.

Table 1: Consumer Refunds by Industry² and Quarter

Industry	Q3 2023	Q4 2023	Q1 2024	Q2 2024
Energy	\$639,504	\$609,939	\$1,091,153	\$2,502,211
Telecommunications	\$142,225	\$157,702	\$143,155	\$132,964
Transportation	\$50	\$987	\$172	\$99
Water	\$17,940	\$12,039	\$16,391	\$3,972
Total	\$799,719	\$780,667	\$1,250,871	\$2,643,119

Table 2 highlights the average refunded amount from the utility to the consumer in Q2 by industry: Telecommunications **\$496**, Energy **\$8,177**, Transportation **\$99**, and Water **\$3,972**. Many of the refunds resulted from incorrect billing and were disbursed by the utility following CAB’s involvement. There was a notable case where a commercial customer of Southern California Edison was billed incorrectly from September 2021 to March 2024 due to an error in the rate schedule. CAB facilitated a **\$1,400,608** charge reversal and refund credit for net solar generation, the highest received for a CAB informal complaint.

¹ In comparison to an IC, the CPUC has a Formal Complaint (FC) process. A FC is a written legal document that claims a utility regulated by the CPUC has violated state laws or the CPUC’s orders or rules. A FC describes these violations, the injury suffered, because of them, and the resolution requested from the CPUC and is overseen by an Administrative Law Judge. CAB focuses on ICs and presents results of Q2 in this report.

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

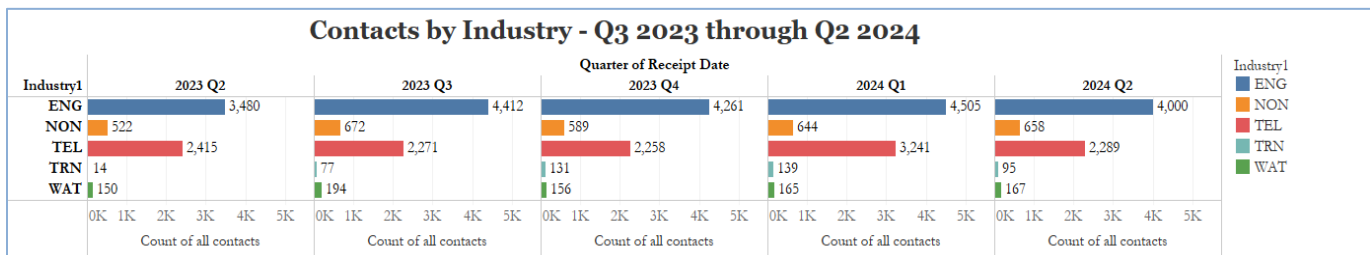
Table 2: Q2 2024 Consumer Refund Statistics

Industry	Count of Refunds	Avg. Refund Amount	Min. Refund Amount	Max. Refund Amount	Total Refund Amount
Energy	306	\$8,177	\$1	\$1,400,608	\$2,502,211
Telecommunications	268	\$496	\$3	\$21,661	\$132,964
Transportation	1	\$99	\$99	\$99	\$99
Water	9	\$441	\$12	\$1,485	\$3,972
Total	584	\$9,213	N/A	N/A	\$2,643,119

CAB Received 7,209 Consumer Contacts

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 Q2-2024, CAB received **7,209 contacts**³.

Figure 1: Consumer Contacts by Industry and Quarter



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

³ 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.

CAB Assisted 2,082 Consumers Resolve Informal Complaints

CAB’s Informal Complaints (ICs) are written complaints⁴ about issues under the CPUC’s jurisdiction where CAB has the authority to act as an intermediary between the consumer and the regulated utility to resolve the consumer’s issues. The IC process provides consumers an easily accessible way to resolve disputes with their utility

Table 3 shows the distribution of resolved ICs across regulated industries. In Q2-2024, CAB resolved 2,082 ICs. Of the ICs closed in Q2, **65 percent** were for Energy ICs, **32 percent** were for Telecommunications ICs, and **3 percent** were attributed to Water ICs.

Table 3: Informal Consumer Complaints Resolved by Industry and Quarter

Industry	2023 Q3	2023 Q4	2024 Q1	2024 Q2	2024 Q2 % of Total
Energy	1,364	2,167	1,714	1354	65%
Telecommunications	710	745	752	671	32%
Transportation	3	9	9	4	0%
Water	63	77	71	53	3%
Total	2,140	2,998	2,475	2,082	100%

Energy Utilities Recap with Q2-2024 Highlights

This report reviews consumer contacts CAB received in Q2-2024 for all energy utilities, specifically the Top-10 utilities. Being a member of the Top 10 means that CAB received the most contacts for these companies compared to all other energy companies regulated by the CPUC.

Energy Consumer Contacts Q2-2024

CAB received a total of **4,538** contacts related to energy utility companies in Q2-2024. The Top-10 energy utilities accounted for **96 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 **47 percent** and **28 percent** of contacts, respectively. Most contacts were related to High Bills, Wrong Number, Non-Jurisdictional Customer Service, Disconnection Non-payment, and Delayed Orders/Missed Appointments.

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

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

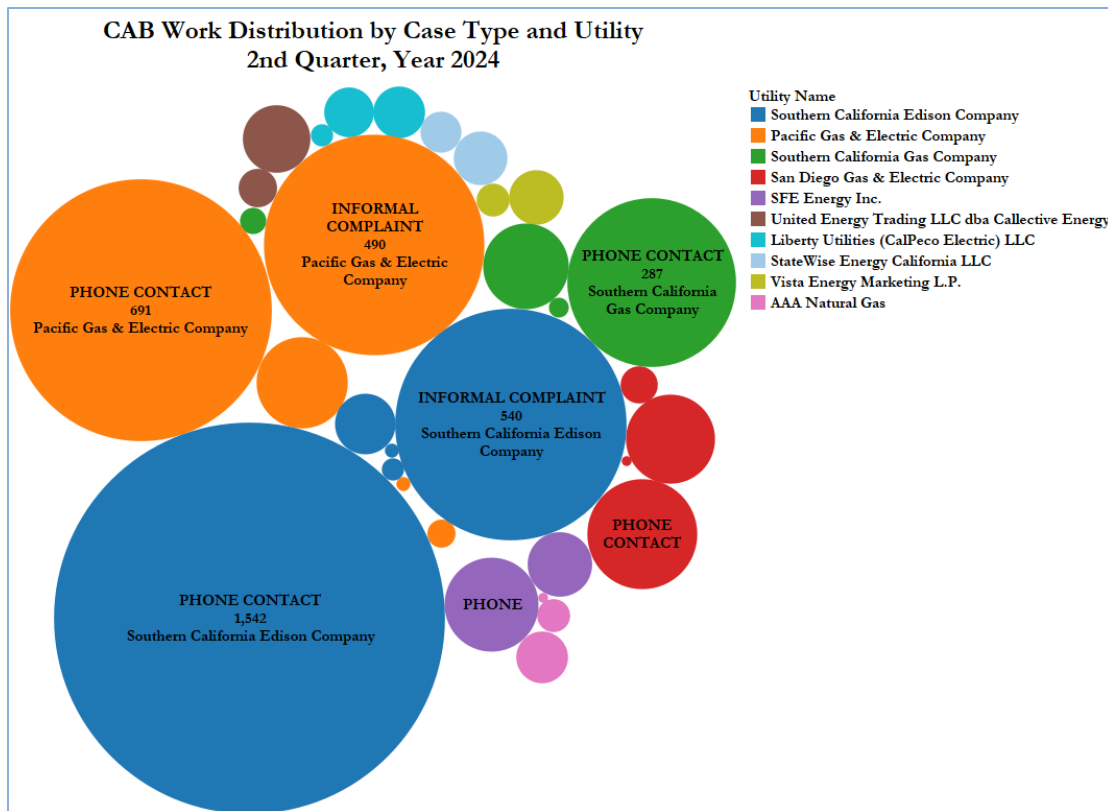
Table 4: Top-10 Energy Utilities Contact Statistics

Contacts and Top-10 Utilities	Q2 2024	% of Total
Total Energy Contacts	4,538	100%
Total Top-10 Energy Utilities Contacts		
Southern California Edison Company	2,126	47%
Pacific Gas & Electric Company	1,275	28%
Southern California Gas Company	372	8%
San Diego Gas & Electric Company	217	5%
SFE Energy Inc.	131	3%
United Energy Trading LLC dba Collective Energy	61	1%
Liberty Utilities (CalPeco Electric) LLC	57	1%
StateWise Energy California LLC	46	1%
Vista Energy Marketing L.P.	41	1%
AAA Natural Gas	39	1%
Total for Top-10 Energy Utilities Contacts	4365	96%

Figure 2 portrays the relative impact of each of the Top-10 energy utilities on CAB’s energy workload by volume of contacts. The chart was created using utility name, case type, and case count variables. Each of the Top-10 utilities is represented by a unique color replicated throughout this report. The size of the bubbles is relative to the case counts for each utility and case type.

In Q2-2024, CAB’s energy consumer contacts were dominated by SCE, PG&E, and San Diego Gas & Electric consumers, respectively. Most of CAB’s staff resources were allocated to these three companies. The various case types represent different contact resolution processes, with Phone Contacts being the least time intensive, and ICs and Complaints⁵ being the most intensive.

Figure 2: CAB Energy Work Distribution by Case Type and Utility – Q2-2024



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

Table 5 shows the ranking of the Top-10 Energy Utilities for Q2-2024 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.

Southwest Gas Corporation (Southwest Gas) had the largest average utility response interval of **58 days**. In contrast, PG&E and SCE responded to **520** and **572 ICs** with an average response interval of only **19** and **22 calendar days**, respectively.

Table 5: Top-10 Energy Utilities by Case Responses - Average Utility Response Intervals Q2-2024

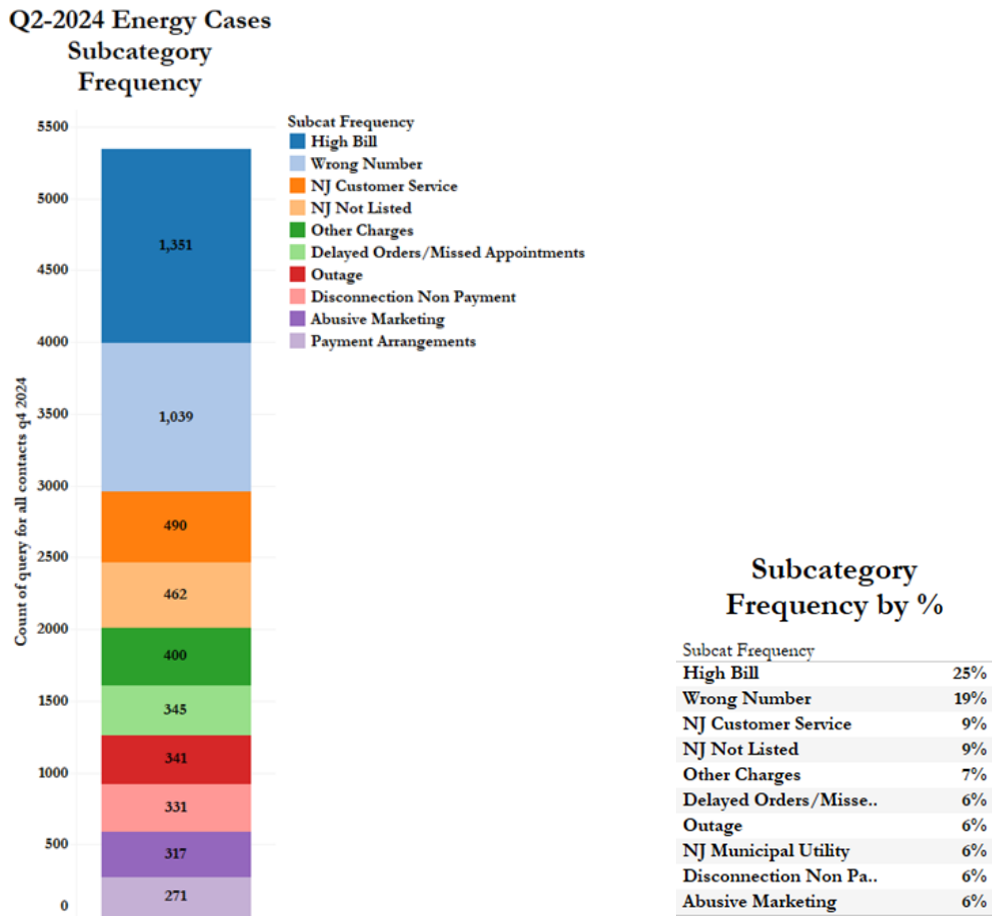
Utility	Count of Case Responses	Average Response Interval (No. of Days)
Southwest Gas Corporation	14	58
Liberty Utilities (CalPeco Electric) LLC	29	36
San Diego Gas & Electric Company	94	23
Southern California Gas Company	71	22
Southern California Edison Company	572	22
StateWise Energy California LLC	14	20
Pacific Gas & Electric Company	520	19
SFE Energy Inc.	37	16
United Energy Trading LLC dba Collective Energy	24	14
AAA Natural Gas	15	4
Total	1,390	234

Top-10 Subcategories for Top-10 Energy Companies for Q2-2024

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 Q2-2024. The High Bill subcategory was applied to **25 percent** of all contacts, followed by Wrong Number and Non- Jurisdictional Customer Service, which were applied to **19 percent** and **9 percent**, respectively.

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



Telecommunications Utilities 12-Month Recap with Q2-2024 Highlights

In Q2-2024, CAB handled a total of 2,038 contacts pertaining to telecommunication utilities, excluding LifeLine-related inquiries. Notably, the following 10 telecommunications utilities received the majority, encompassing **84 percent** of all telecommunication-related contacts for the quarter. AT&T California received the highest volume of contracts, constituting **30 percent** of the total queries directed at telecommunication companies.

Table 6 gives a detailed breakdown of the total number and percentage of contacts received by the Top-10 telecommunication utilities in Q2-2024.

Table 6: Top-10 Telecommunication Utility Contact Statistics.

Top -10 Telecommunications Contacts	Q2 2024	% of Total
Total for Telecommunications Contacts	2,038	100%
Top-10 Utilities		
AT&T California	620	30%
Frontier California Inc.	307	15%
Comcast Phone of California	191	9%
Charter Fiberlink CA-CCO, LLC	170	8%
T-Mobile West LLC	123	6%
Verizon Wireless	100	5%
AT&T Mobility Wireless Operations Holdings Inc.	96	5%
Cox California Telecom, LLC	48	2%
Comcast OTR1, LLC	39	2%
Bright House Network Information Services (California)	21	1%
Total Top-10 Telecommunications Contacts	1,718	84%

When examining the first-quarter data, a clear shift is evident compared to the preceding quarters. In the fourth quarter of 2023, contacts remained low compared to the earlier quarters.

Figure 4 depicts a surge in contacts from AT&T California during the first quarter of 2024 compared to previous quarters in the past year. However, there was a decline in the number of contacts related to Policy & Practice in the second quarter, which is linked to AT&T's request to be relieved from the Carrier of Last Resort obligation. The Policy and Practice category is chosen when consumer contacts are related to the utility and CPUC policies and practices. This change indicates a shift in the volume of inquiries and issues raised by consumers.

Figure 4: Top-10 Telecommunication Company Consumer Contacts by Category

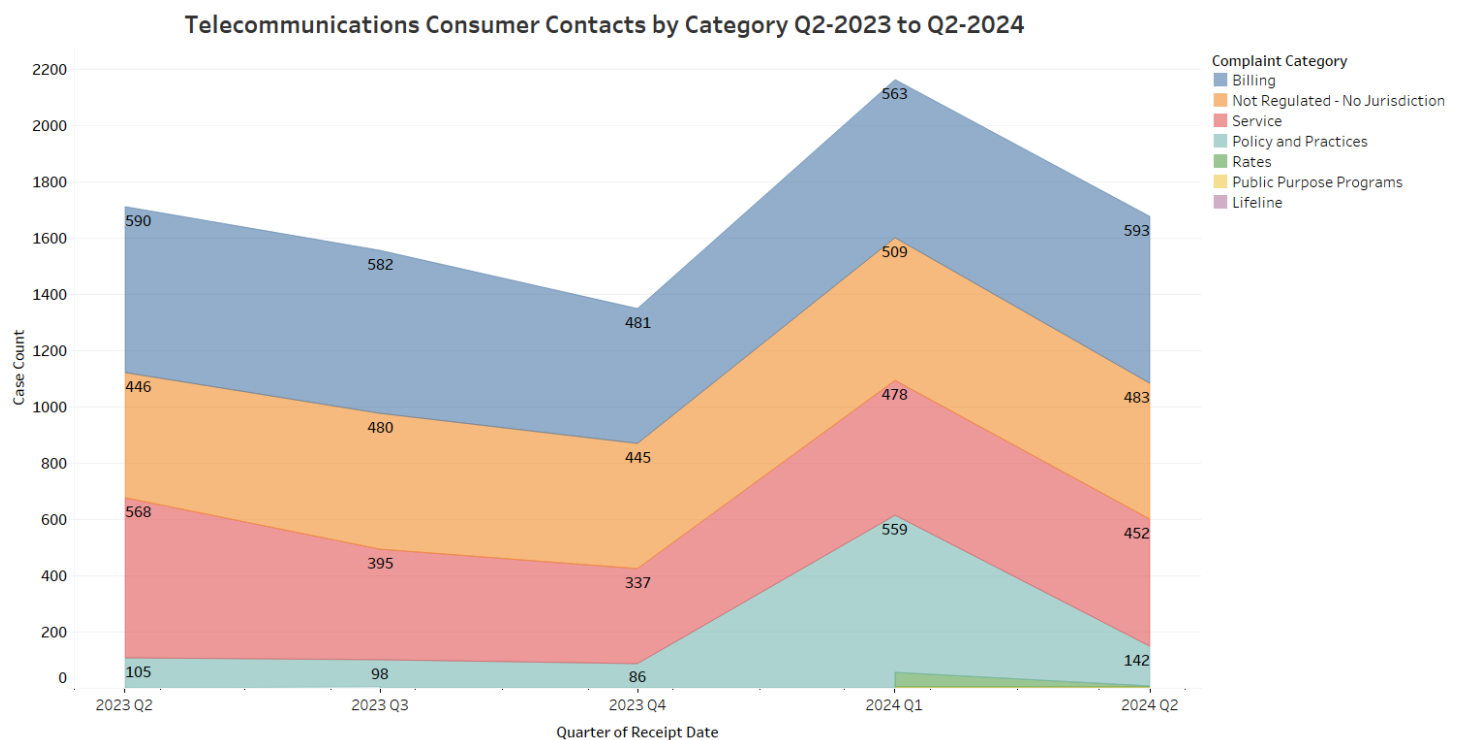


Figure 5 provides a detailed snapshot of case counts among the Top-10 telecommunication companies from April to June 2024. Notably, AT&T California replaced Frontier California with the largest share of contracts each month, i.e., making up 30 percent of all complaints received by these Top-10 utilities.

In contrast, the other carriers experienced minimal changes compared to previous quarters, maintaining relatively stable contact levels.

Figure 5: Telecommunication Company Consumer Contacts

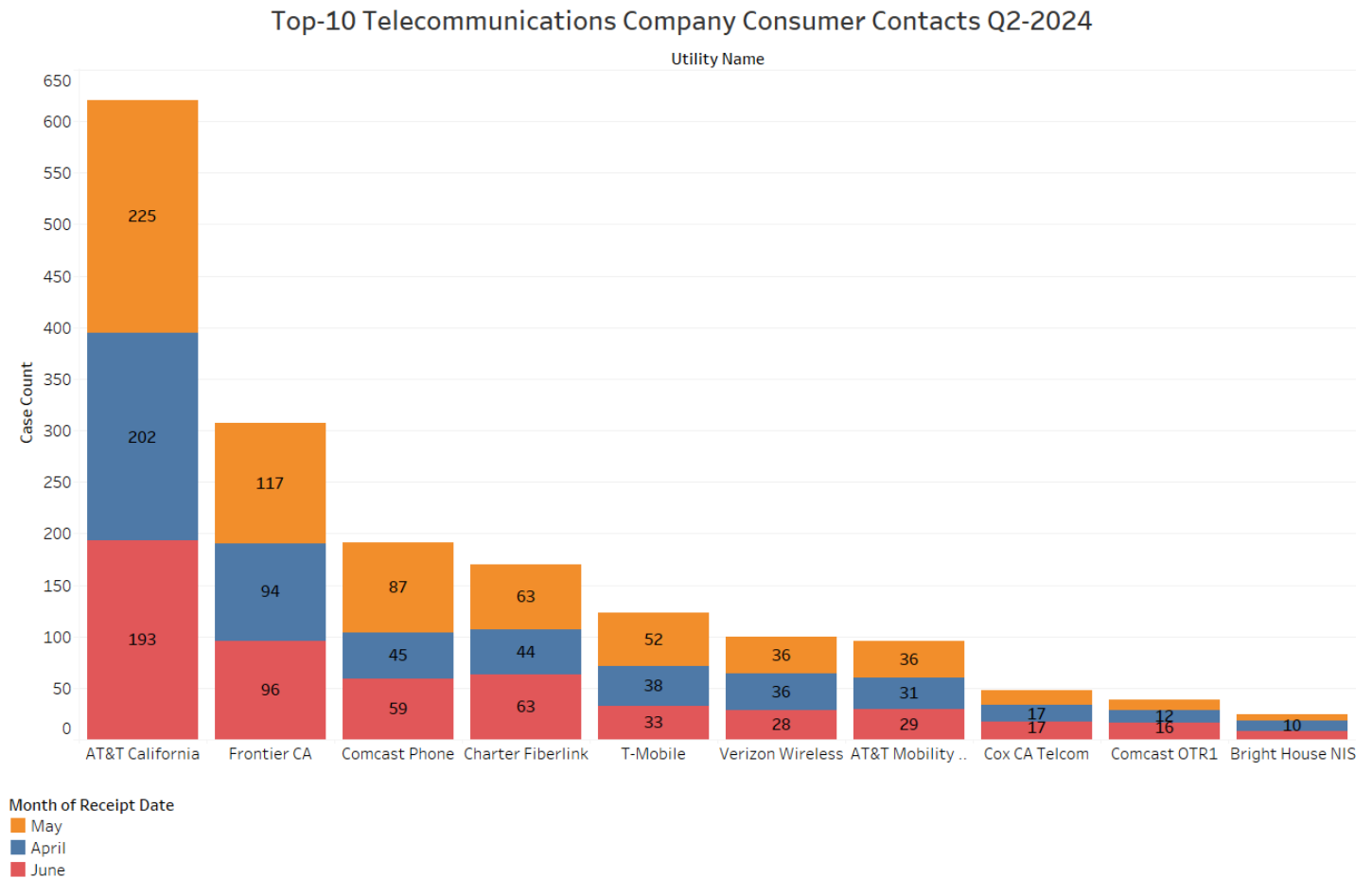
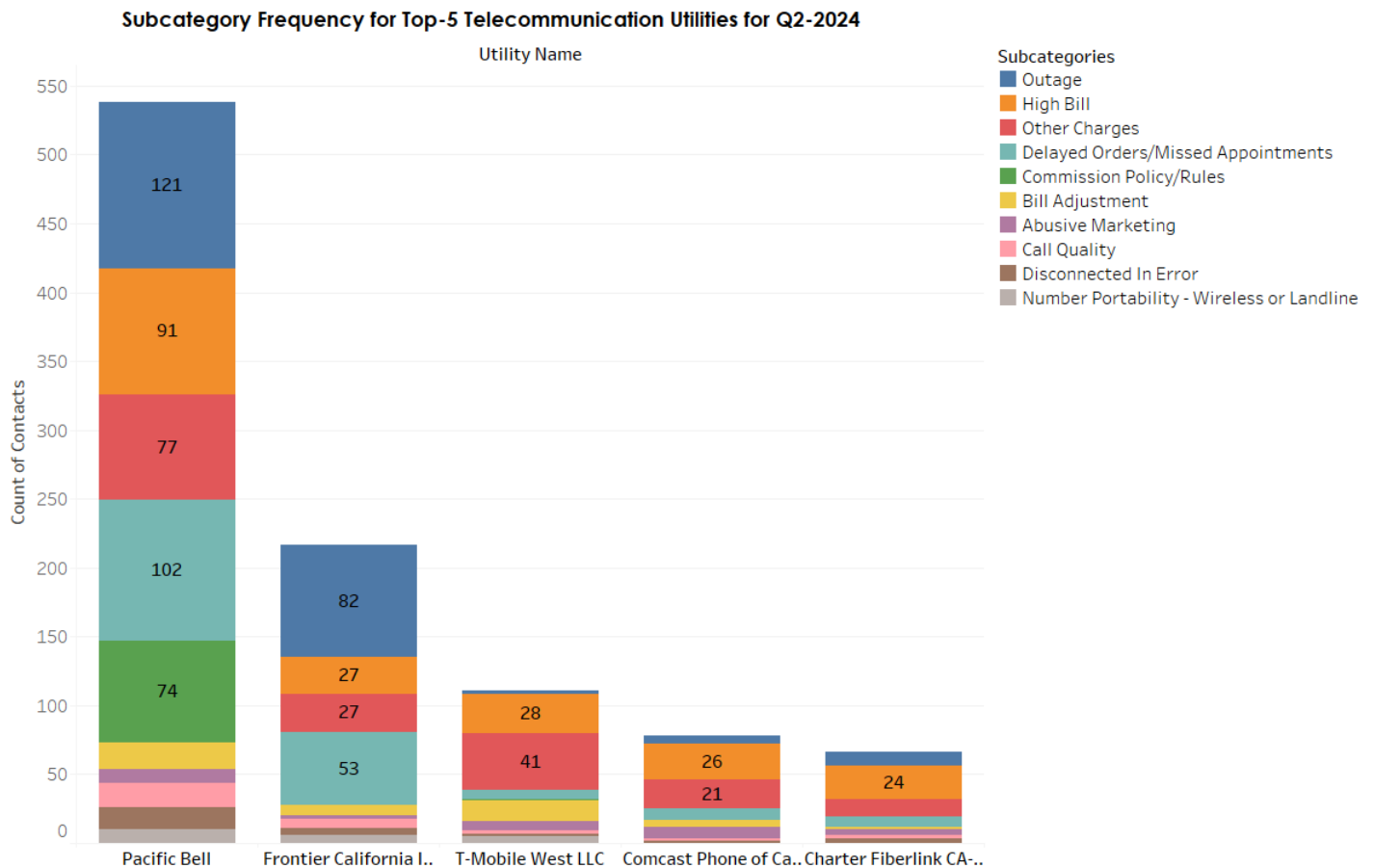


Figure 6 delves into subcategory frequencies for the Top 5 telecommunication utilities in the second quarter of 2024. A deeper analysis reveals significant patterns and trends. Complaints related to Commission Policy and Rules dramatically decrease, primarily dominated by AT&T. Outages, High Bill, and Delayed Orders/Missed Appointments are prevalent across multiple utility companies, indicating common challenges within the telecommunication sector.

Figure 6: Subcategory Frequency for Top-5 Telecommunication Utilities for Q2-2024



The Outage subcategory is also significant, indicating instances of service disruptions. Some utilities are grappling with higher case counts in this area, signaling a need for improved service reliability. AT&T California has a higher frequency across various subcategories, particularly in Outages, High Bills, and Delayed Orders/Missed Appointments. Frontier California Inc. also exhibits substantial case counts in Outages, Delayed Orders/Missed Appointments, and High Bill. The data hints at specific areas where each utility could focus on improvement. This may involve improving service reliability to reduce service outages.

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.

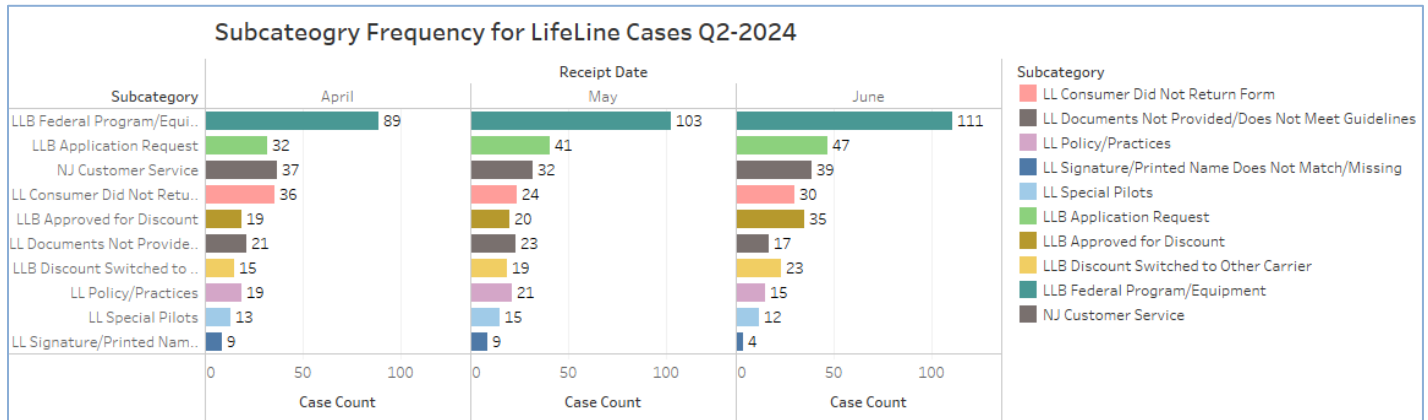
Table 7 outlines the number of LifeLine cases received, and the top written case types closed during the fourth quarter. In Q2-2024, Lifeline complaint data reveals a significant surge in written contacts compared to the previous quarter and a gradual increase over the past quarters. Moreover, the data also highlights the ongoing trend of LifeLine Phone Contacts, where consumers consistently engage with CAB regarding their LifeLine-related concerns, queries, and complaints. The uptick in written contacts in Q2 compared to Q4 could be attributed to seasonal fluctuations.

Table 7: LifeLine Contacts Received and Closed

	2023		2024		% Change
	Q3	Q4	Q1	Q2	Q1 to Q2
LifeLine Contacts Received					
Phone Contacts Received	325	368	303	279	-8%
Written Contacts Received	421	546	783	363	-54%
Total Lifeline Contacts Received	746	914	1086	642	-41%
Top LifeLine Cases Type Closed					
LifeLine Wireless Appeal	174	144	362	83	-77%
LifeLine Billing	172	136	170	131	-23%

Figure 7 exhibits the Top-10 LifeLine subcategories most frequently reported from Q2-2024 contacts.

Figure 7: LifeLine Subcategory Frequency Comparison between February and March 2024



In the second quarter, the Lifeline Billing (LLB) Federal Program/Equipment subcategory experienced an overall increase during the quarter. This subcategory is chosen when consumers encounter issues securing a free or discounted phone through their Lifeline Wireless Carrier. These issues typically involve not receiving the equipment or receiving a defective handset.

In the previous quarter, the LL Consumer Did Not Return Form was the highest subcategory used, with 196 contacts in January and 161 in February. This increase was attributed to the seasonal filing time, which can be noted by the fact that the contacts significantly dropped to just 35 in March. This subcategory is selected when CAB does not have evidence that the application form was returned, the consumer did not return the household worksheet with their application form, or the application was received after the due date.

Contacts associated with the Lifeline Billing (LLB) Federal Program/Equipment subcategory experienced an overall decline during the quarter. This subcategory is chosen when consumers encounter issues securing a free or discounted phone through their Lifeline Wireless Carrier. These issues typically involve not receiving the equipment or receiving a defective handset.

LLB Approved for Discount services saw a slight increase in the first quarter compared to the fourth quarter. This subcategory is selected when consumers assert that they are not receiving the Lifeline discount on their bill despite being confirmed by the Lifeline Administrator to receive it from the carrier linked to their current telephone bill.

Occurrences of LL Documents Not Provided/Does Not Meet Guideline experienced a decrease in the number of cases compared to the end of the fourth quarter. This subcategory is selected when CAB begins receiving complaints about consumers either not receiving the correct documents or being rejected due to not meeting the annual income guidelines required for enrollment in the Lifeline program.

The LLB Application Request subcategory is assigned in scenarios where consumers attempt to request a new LL application from their carrier but have not received the form, and after CAB verified that they are not pending in the Certifying Agents database as a new customer or as a customer attempting to get back onto the program.

LL Policy/Practices contacts remained stable where a Lifeline consumer expresses dissatisfaction with or protests a Lifeline-related action or practice of a utility regulated by the CPUC.

LL Form Complexity (consumer finding the application form complex) also played a role in consumer contacts.

Overall, the analysis of LifeLine contacts in Q2-2024 emphasizes the vital role of CAB's efficient consumer support and resolution mechanisms in addressing a wide range of consumer needs and concerns.

Environmental Social Justice (ESJ) Consumer Contacts for Q2-2024

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)

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 software. Reporting by Zip Code allows readers to better identify with the data because almost everyone knows their zip code, but not everyone knows their census tract. The reported results are more meaningful to the reader.

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 Quadrants (0-24, 25-49, 50-74 percentiles) in some portions of the ESJ analysis.

CAB sometimes “normalizes” the complaint data to observe the relative impact of an issue across different zip codes. The normalization equation is simple: the number of contacts in a zip code divided by the zip code population. Normalization ratios allow for an “apples-to-apples” comparison between zip codes. The higher the ratio, the greater the impact or intensity.

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

CPUC defines Disadvantaged Communities under CalEnviroScreen 4.0 as census tracts that score in the top 25 percentile (75th – 100th percentiles)⁶ of CalEnviroScreen 4.0, those that score within the highest 5 percent of CalEnviroScreen 4.0’s Pollution Burden but do not receive an overall CalEnviroScreen score, census tracts identified as Disadvantaged Communities in CalEnviroScreen 3.0, and areas under the control of federally recognized Tribes.

⁶ The higher the percentile number, the greater the impact of the measure on the affected geographic area.

Energy ESJ Highlights

- ESJ Contacts remain relatively stable over a 12-month period for the zip codes in the 75th-100th ESJ Percentiles
- Consumers in the 75th to 100th ESJ Percentiles cite High Bill and Customer Service as their areas of most significant concern, followed by Payment Arrangements, Disconnection Non-Payment, and Abusive Marketing
- CAB recorded a 21% increase in Disconnection Non-Payment Contacts between Q1 2024 and Q2 2024
- Abusive Marketing complaints against CTA’s surged between the second half of 2023 and the first half of 2024.
- The most impacted zip codes for Disconnection Non-Payment were in zip codes in Oakland, Crestline, and Mojave.

Table 8 shows the upward trend of energy related contacts from consumers who live in zip codes where their ESJ Percentile is calculated between 75 and 100. Complaints exhibit an upward trend over the previous quarter.

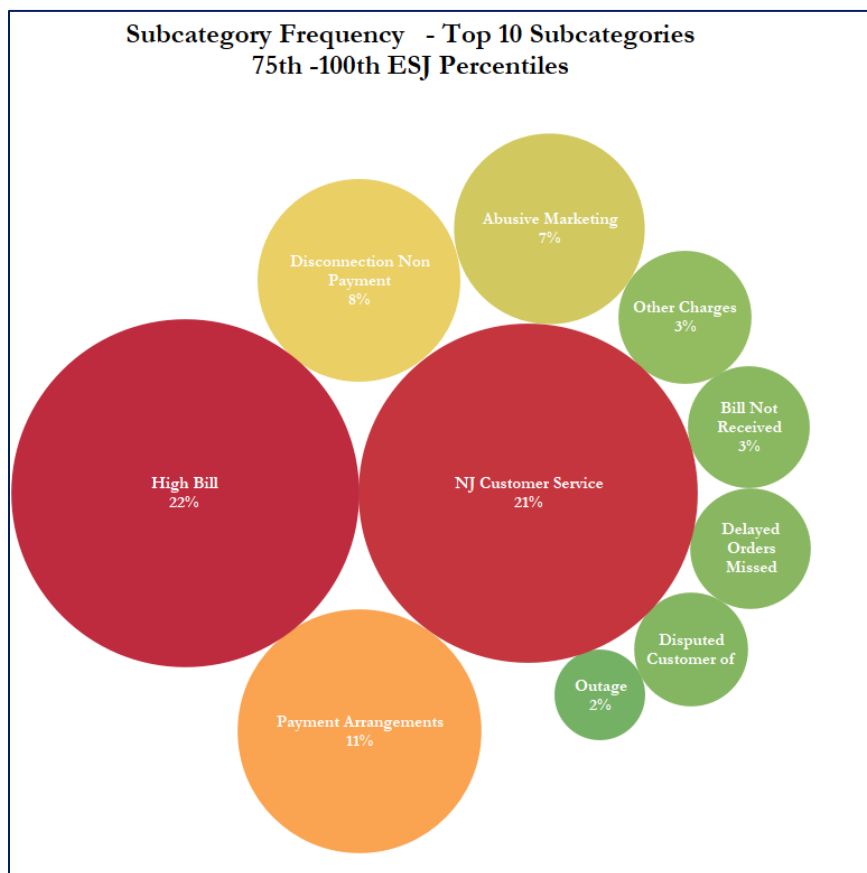
Table 8: Energy ESJ Contacts 75th - 100th Percentile, Q3-2023 to Q2-2024.

ESJ Contacts Percentile	Q3 2023	Q4 2023	Q1 2024	Q2 2024
Energy ESJ 75 - 100	936	1,047	969	1,020

What Consumers in the 75-100th ESJ Percentiles are Complaining About

Figure 8 illustrates the subcategory frequency (the number of times a subcategory was chosen to describe consumer contacts expressed as a percent) for consumer contacts in the 75th to 100th ESJ Percentile. During the second quarter of 2024, consumers in the 75th to 100th ESJ Percentile issues are dominated by High Bill and Customer Service complaints. Further reflecting these consumers’ economic stress Payment Arrangements and Disconnection Non-Payment are the next two most frequent subcategories chosen. Energy industry complaints related to Abusive Marketing congeal around the Core Transport Agents (CTA) are the subject of additional analysis later in this report.

Figure 8: Subcategory Frequency – Top-10 Subcategories for 75th - 100th ESJ Percentiles.



Disconnection Non-Payment Contacts

Table 9 illustrates that Disconnection Non-Payment (DNP) contacts increased 21 percent between Q4-2023 and Q2-2024 for all ESJ Quartiles combined. The largest increase in DNP contacts came from the 50th-74th ESJ percentile. This reverses what CAB hoped to be a downward trend in DNP contacts.

Table 9: Energy Disconnection Non-Payment Contacts in ESJ 75-100 Percentile, Q3-2023 to Q2-2024

ESJ Percentile/Quartile	2023 Q3	2023 Q4	2024 Q1	2024 Q2	Grand Total	Quartile % of Total
75-100	124	157	137	135	553	47%
50-74	85	69	60	110	324	27%
25-49	52	49	44	50	195	16%
0-24	28	29	22	36	114	10%
Total	289	304	263	331	1186	100%
Rate of Change	9%	5%	-13%	21%	-	

Core Transport Agents and Abusive Marketing Complaints

Core Transport Agents (CTA) are non-utility gas suppliers who purchase gas for residential and small commercial end-use customers. If a consumer elects to take CTA service from one of the many providers in California, the consumer will be able to 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 Commission to conduct business in California. Since the Commission can suspend or revoke the registration of a non-compliant CTA, it can effectively process consumer complaints against CTAs⁷.

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, we examined abusive

⁷ 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.

marketing complaints against the CTAs to determine whether specific demographic groups were targeted for aggressive and/or fraudulent marketing campaigns. In that last report, CAB found that most abusive marketing contacts came from the 75th-100th percentile and were responsible for the largest geographic footprint in terms of several zip codes from consumer contacts. The demographic that represents the 75th – 100th Percentile zip codes is predominantly Hispanic and/or African American, with median household usually less than half of the statewide median income, low educational achievement, and experience higher than average levels of linguistic isolation.⁸

In this report, CAB will explore abusive marketing complaints against CTAs in greater depth, comparing the increase in abusive marketing complaints between the last half of 2023 and the first half of 2024. This report also highlights two CTAs,

Figure 9 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, despite a CPUC citation program to deter unauthorized switching of the gas provider.

The red line represents the 75th to 100th Percentile group (quartile), except for the 2021 peak, tied with the 50th to 74th quartile. The 75th-100th quartile consistently receives the most abusive marketing complaints, and this trend has been particularly prominent in the last year or so. The Q1 report discussed targeted marketing to the demographic represented by the 75th to 100th quartile, identified by zip code.

⁸ **Linguistic Isolation in California**

Linguistic isolation refers to limited English-speaking households, where more than 40% of Californians speak a language other than English at home. Approximately half of those individuals do not speak English well or at all! This language diversity can pose challenges in accessing social services, medical care, and emergency information.

Here are some key points about linguistic isolation in California:

1. CalEnviroScreen Indicator:

- CalEnviroScreen, a tool for assessing environmental health disparities, includes linguistic isolation as an indicator.
- The indicator measures the percentage of limited-speaking households (where no one over age 14 speaks English well) based on data from 2015-2019.
- Linguistically isolated households may struggle to access essential services and emergency information during crises.

2. Regional Variation:

- Rates of linguistic isolation vary across regions.
- In 2019, households headed by immigrants had the highest rates of linguistic isolation in the Central Valley (nearly 33%), Monterey-San Benito (32%), Los Angeles (nearly 29%), and San Francisco-Marin (28%)
California language isolation map - Search (bing.com)

Figure 9: Consumer Contacts About CTAs Where Abusive Marketing is Subcategory 1

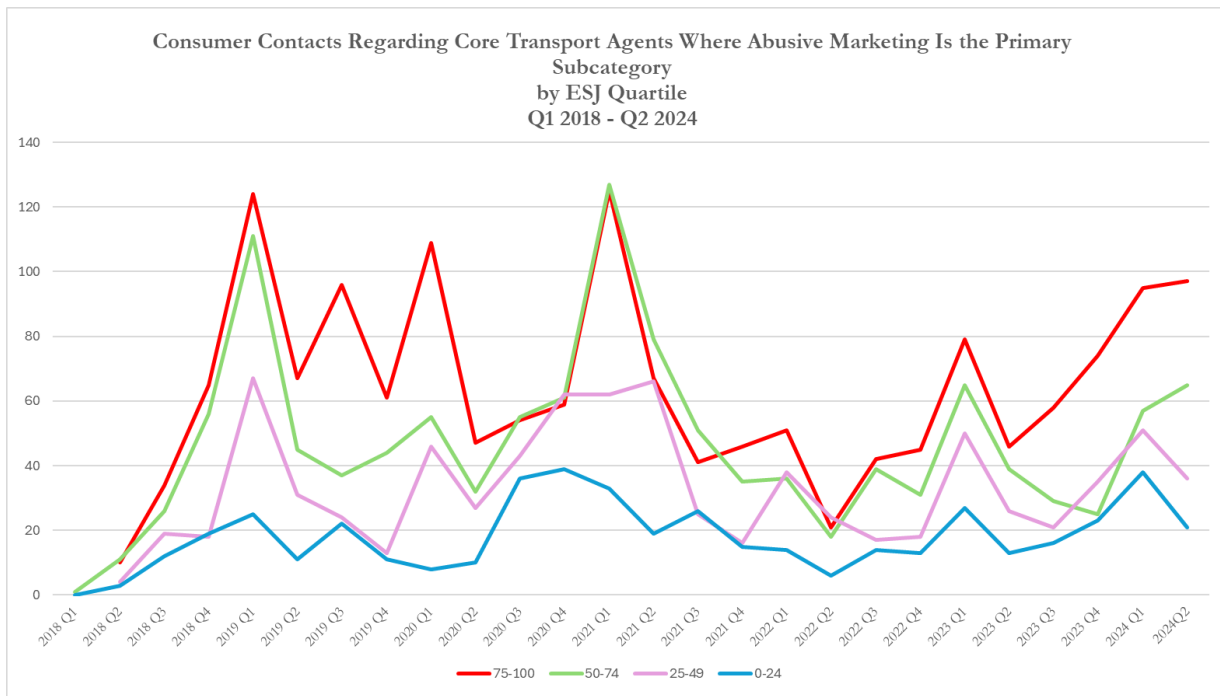


Table 10 examines the relationship between ESJ percentiles, their corresponding geographic footprint, and the contacts received in each ESJ Percentile Quartile. It also shows the substantial growth in the number of Abusive Marketing contacts (where Abusive Marketing is Subcategory 1) between the second half of 2023 and the first half of 2024. Not only did the number of contacts by quartile increase substantially in all four quartiles, but the number of zip codes also increased significantly, indicating an expansion in CTAs' aggressive door-to-door marketing campaign.

Table 10: CTA Abusive Marketing Contact and Zip Code Counts by ESJ Quartile Q3 2023 – Q2 2024

ESJ Percentile Range/Quartile	Contact Count Q3-4 2023	Zip Code Count Q3-4 2023	Contact Count Q1-2 2024	Zip Code Count Q1-2 2024	Percent Change Contact Count	Percent Change Zip Count
75-100	132	50	192	66	45%	32%
50-74	54	39	122	58	126%	49%
25-49	56	36	88	55	57%	53%
0-24	39	27	59	42	51%	56%
0-100	281	152	461	221	219%	135%

TEAM and CHANGES

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

TEAM and CHANGES support LEP utility consumers statewide through **24** Community-based Organizations (CBOs) that offer services in their preferred language and with cultural sensitivity. The CBOs provide consumer outreach, education, and case assistance (needs assistance and dispute resolution). In Q4-2023, CBOs provided case assistance to consumers for financial and other needs (e.g., CARE/LifeLine or other financial assistance programs) or with utility disputes. 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 **\$1.68 million** annually.