California's Concurrent Application System (CAS)

2025 Annual Meeting of the National Association of State Utility Consumer Advocates

Matt Baker, California Public Utilities Commission

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California Public Utilities Commission

The challenge: high rates and subsidy bill impacts

California Alternate Rates for Energy (CARE)

- 30-35% electric discounts and 20% gas discounts
- Customers >200% FPL

Family Electric Rate Assistance (FERA)

- 18% electric discount
- Customers 200-250% FPL

California Alternate Rates for Energy (CARE) Electricity Bill Discount Snapshot - 2024

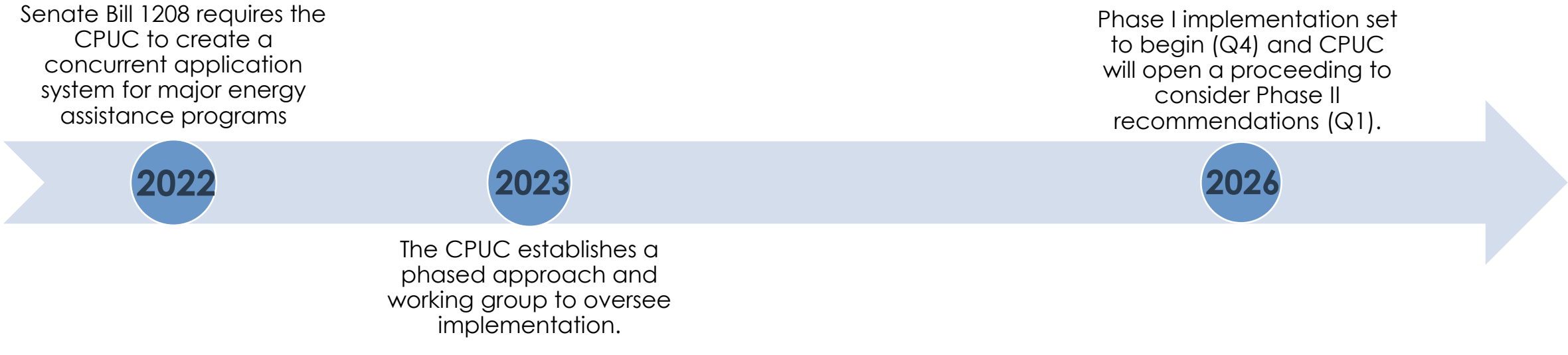
Utility	Annual Subsidy Cost ($M)	Enrollment Rate vs. Eligible Population	Avg. Monthly Bill Impact for Non-Participants*
PG&E	$1,105	95%	$10
SCE	$855	104%	$9
SDG&E	$212	106%	$8
SoCalGas	$180	107%	--

Annual Reports of PG&E, SCE, SDG&E and SoCalGas on Low Income Assistance Program Year 2024, (Spring 2025), https://liob.cpuc.ca.gov/annual-reports/
CPUC. "Senate Bill 695 Report, p.24 (September 2025), https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/office-of-governmental-affairs-division/reports/2025/2025-sb-695-report_093025.pdf

CAS Background

SB 1208 (2022) – PU Code § 731:

Develop a process that enables customers to concurrently apply, or begin to apply, to multiple low-income customer assistance programs using data collected during the original application process, including, but not limited to, the ESA, CARE, and FERA programs



CAS Phased Implementation Approach

Phase I (Q4 2026)

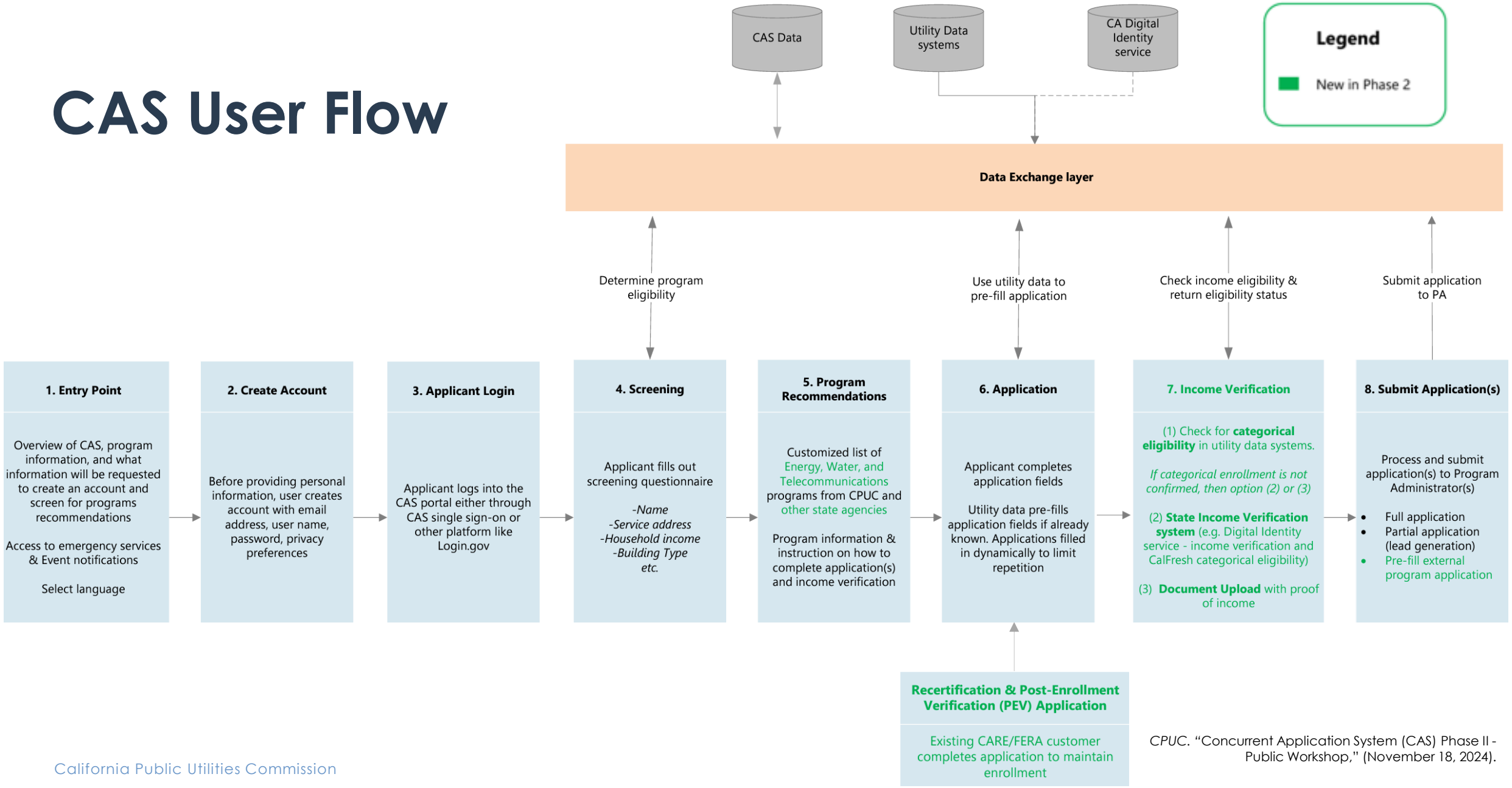
- Focus on **core energy programs** addressing:
  - Bill assistance (CARE, FERA)
  - Energy efficiency (ESA)
  - Arrearage Management Plans (AMP)
  - Solar savings (DAC-GT)
- Allows partial applications for other energy programs that require income verification, home assessment, etc.

Phase II (Recommendations)

- Proposals to expand to **additional energy, water, and telecommunications income-qualified programs**
- Integrate **income verification,** streamlining enrollment, recertification, and post-enrollment verification process for customers and utilities.
- Increase **data sharing** between IOUs and state programs.

CPUC. "Concurrent Application System (CAS) Phase II -Public Workshop," (November 18, 2024),

CAS User Flow



CPUC. "Concurrent Application System (CAS) Phase II - Public Workshop," (November 18, 2024).

CAS Design Principles

Single entry point, rather than a single application

- ✓ Faster build out
- ✓ Greater flexibility and scalability

Customer experience

- ✓ Minimizing repetitive data entry
- ✓ Consent-based/opt-in approach
- ✓ Data privacy and security
- ✓ Language/accessibility

Future Implementation Issues

- **Smaller utilities may not be capable of API integration**, limiting functionality for their customers.
- Data sharing across energy, water, and telecommunications programs will require CAS to establish **common data standards**, a potential barrier to entry.
- How does the CAS **overlap with separate income verification efforts** under the new Base Services Charge?

Thank you!