California's Concurrent Application System (CAS)

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

Matt Baker, California Public Utilities Commission November 10, 2025



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%	

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

Senate Bill 1208 requires the CPUC to create a concurrent application system for major energy assistance programs

Phase I implementation set to begin (Q4) and CPUC will open a proceeding to consider Phase II recommendations (Q1).

2022

2023

2026

The CPUC establishes a phased approach and working group to oversee implementation.

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.

CA Digital **Utility Data** CAS Data Identity Legend systems service New in Phase 2 **CAS User Flow Data Exchange layer** Determine program Use utility data to Check income eligibility & Submit application eligibility return eligibility status pre-fill application to PA 5. Program 1. Entry Point 2. Create Account 3. Applicant Login 4. Screening 6. Application 7. Income Verification 8. Submit Application(s) Recommendations (1) Check for categorical Overview of CAS, program eligibility in utility data systems. Customized list of Process and submit information, and what Applicant fills out Energy, Water, and Applicant completes If categorical enrollment is not application(s) to Program information will be requested Before providing personal screening questionnaire Telecommunications application fields confirmed, then option (2) or (3) Administrator(s) to create an account and Applicant logs into the information, user creates programs from CPUC and CAS portal either through screen for programs account with email -Name other state agencies Utility data pre-fills recommendations CAS single sign-on or (2) State Income Verification Full application address, user name, -Service address application fields if already other platform like Partial application system (e.g. Digital Identity known. Applications filled password, privacy -Household income Program information & Access to emergency services Login.gov service - income verification and (lead generation) -Building Type in dynamically to limit preferences instruction on how to & Event notifications CalFresh categorical eligibility) Pre-fill external etc. complete application(s) repetition program application and income verification (3) **Document Upload** with proof Select language of income **Recertification & Post-Enrollment Verification (PEV) Application** CPUC. "Concurrent Application System (CAS) Phase II -Existing CARE/FERA customer completes application to maintain Public Workshop," (November 18, 2024). California Public Utilities Commission enrollment

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!

