

Consumer Protection and Enforcement Division

MONTHLY ACTIVITY REPORT

July 2023



**California Public
Utilities Commission**

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TRANSPORTATION LICENSING AND ANALYSIS BRANCH (TLAB)

TLAB’s Licensing Section analyzes applications from carriers, issues permits and certificates to carriers that meet state requirements, writes proposed decisions to approve or deny carriers’ CPCN applications, manages changes to carrier operations, communicates with carriers, and tracks carrier compliance with permit requirements. **TLAB’s Analysis Section** functions as the Commission’s subject matter expert on policy matters, providing technical and advisory support to commissioners, administrative law judges, and all levels of agency management on transportation matters.

Processing Carrier Applications

TLAB’s Transportation Licensing Section is processing and managing applications for over 6,600 carriers throughout California. Items processed in July 2023 include applications, vehicle and driver updates, vehicle safety inspection results, and other requests. This work is accomplished through the CPUC Transportation Carrier Portal (TCPortal), an online system that allows carriers to submit applications and other requests electronically and make payments online. The TCPortal tracks certain licensing activities as shown in the following tables and figures.

Figure 1. Total Permits & Certificates

Total Permits and Certificates. Figure 1 shows the total number of operating authorities (active and suspended) by month.

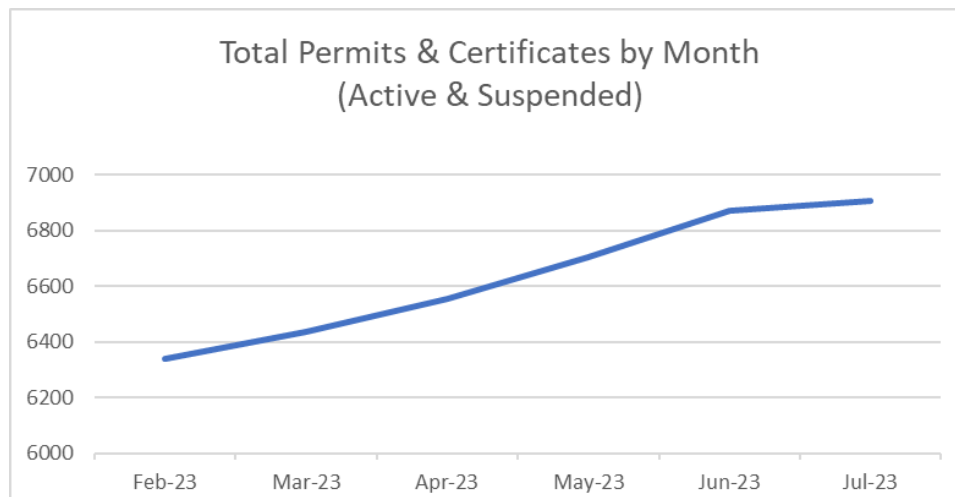


Table 1. Permits and Certificates by Category

Permits and Certificates by Category. The Commission grants permits and certificates for five categories of transportation carriers. Table 1 shows total numbers for those categories in the current month.

Carrier Type	Current Total
Transportation Charter Party	6763
Passenger Stage Corporation	104
Vessel Common Carrier	17
Transportation Network Company	17
Autonomous Vehicle	7

Figure 2. Monthly Completions of Permit Categories

Monthly Completions of Permit Categories. In addition to new applications for operating authorities, TLAB processes refile applications, transfer applications, and renewal applications. Figure 2 shows the numbers of each category completed by month.

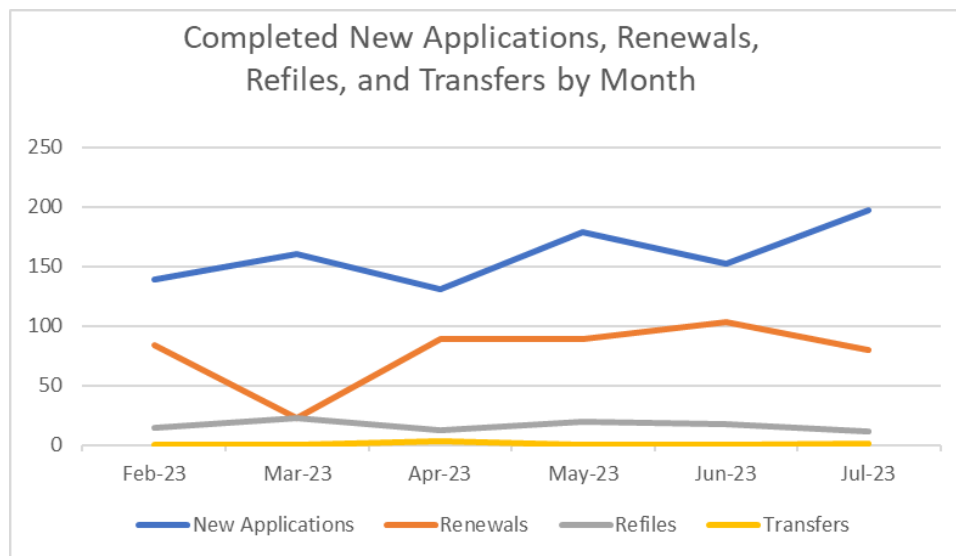


Figure 3. Suspensions and Revocations by Month

Suspensions and Revocations. Carriers can be suspended or revoked for various reasons such as failing to maintain active insurance or file annual or quarterly PUCTRA statements. Carriers may also voluntarily suspend operations. Figure 3 shows both types of suspensions/revocations by month.

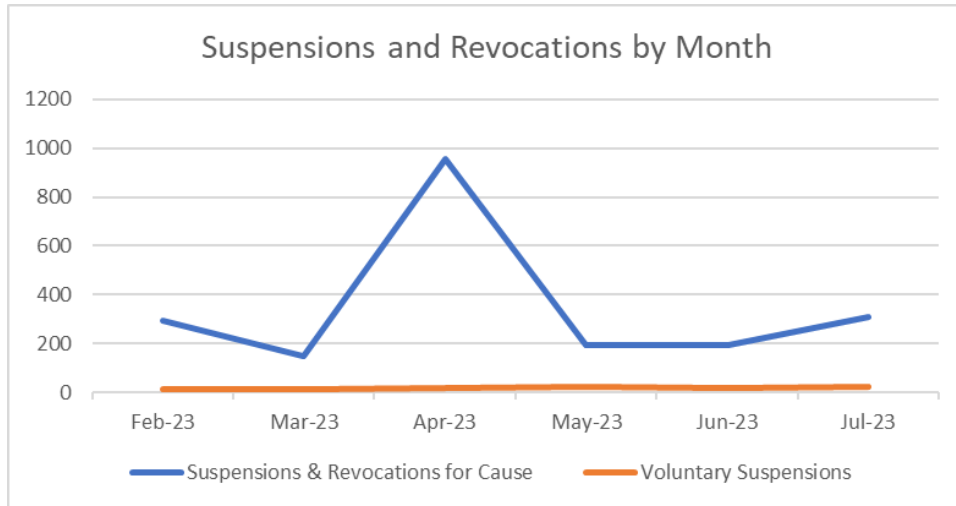


Figure 4. Average Processing Times

Average Processing Times. The total time to process an application, from initial receipt to issuance or denial of a permit or certificate, depends on internal processing time and on the time for external entities to provide necessary information. Upon receipt of applications, CPUC staff review them for completeness and issue deficiency notices to carriers for any outstanding items.

Examples of these items include evidence of insurance coverage filed by the carrier’s insurance agent; evidence of compliance with drug and alcohol testing requirements; and inspection by the California Highway Patrol for vehicles with a seating capacity of 11 or more. Figure 4 shows the average total processing time for the major categories of permits and certificates processed by TLAB.

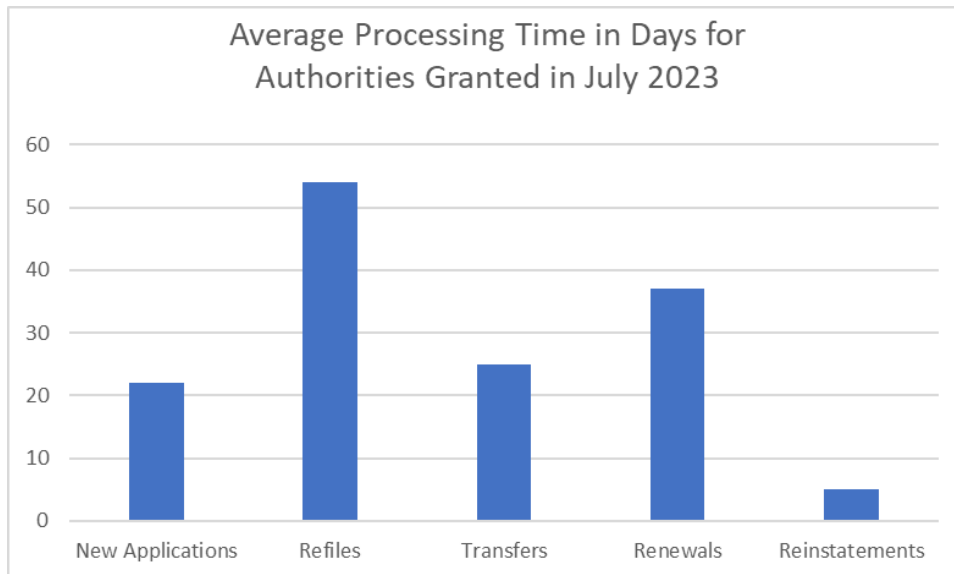
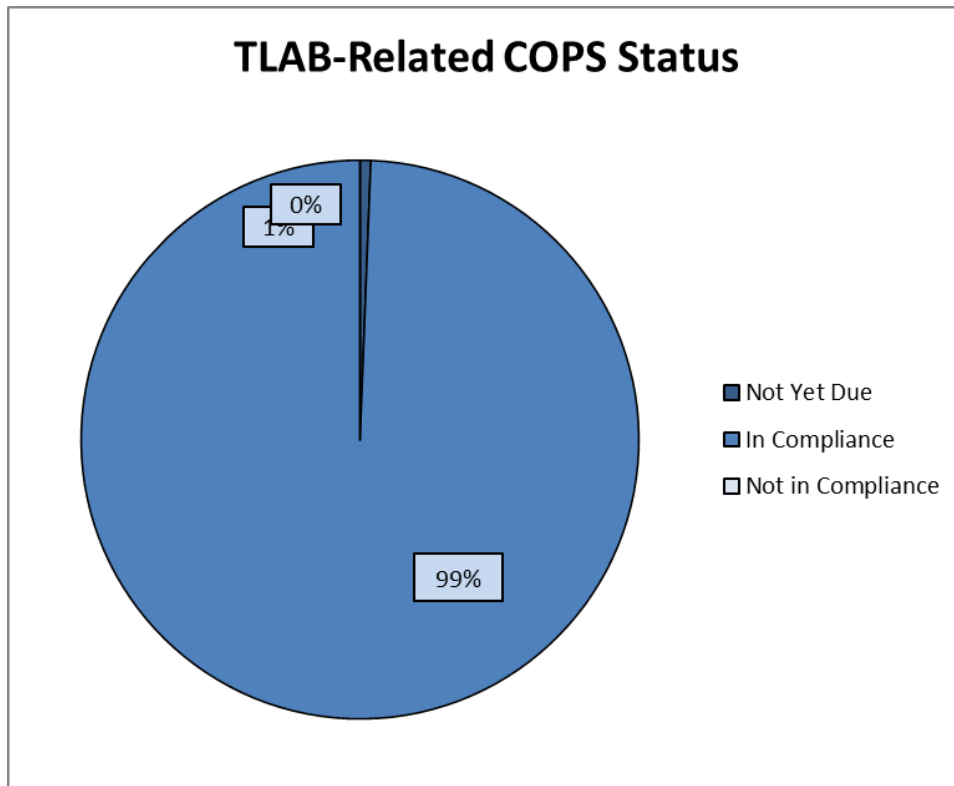


Figure 5. Compliance with Ordering Paragraphs

The Transportation Program is currently responsible for 696 separate Ordering Paragraphs. Many Ordering Paragraphs result from decisions to approve CPCNs for passenger stage corporations, and include permit requirements such as obtaining appropriate insurances, enrolling in drug testing and California Department of Motor Vehicles (DMV) pull-notice programs, receiving bus terminal inspections by CHP and others. Other OPs uphold TEB enforcement actions and impose fines for carrier violations of law and wrongdoing against consumers. OPs also introduce new reporting requirements and transportation policies. Figure 5 shows compliance with the Ordering Paragraphs.



Current Policy Proceedings. The Transportation Analysis Section supports three current proceedings. **R.12-12-011** develops regulations relating to transportation network companies and autonomous vehicles. **R.19-02-012** implements Senate Bill 1376, incentivizing transportation network companies to provide on-demand service for persons with disabilities, including wheelchair users who need a wheelchair accessible vehicle. **R.21-11-004** implements the California Clean Miles Standard and Incentive Program, enacted through Senate Bill 1014, requiring the California Air Resources Board and the Commission to jointly work to lower greenhouse gas emissions from transportation network companies.

R.12-12-011 / TNC Rulemaking / Mason & Chiv / Shiroma

1. On July 26, Commissioner Shiroma issued an Assigned Commissioner Ruling setting a Status Conference / All Party Meeting to address safety issues regarding driverless autonomous vehicle interactions with first responders, to be held August 7.

R.19-02-012 / TNC Access Rulemaking / Chiv / Shiroma

1. No docket activity.

R.21-11-014 / Clean Miles Standard / Wang / Shiroma

1. No docket activity.

Carrier Application Proceedings. The Transportation Licensing Section assists the Commission in the regulation of Passenger Stage Corporations and Vessel Common Carriers. **Passenger Stage Corporations (PSCs)** are carriers that transport passengers between points on an individual fare basis. Examples are fixed-route bus services and “share-the-ride” airport shuttle services. **Vessel Common Carriers (VCCs)** are carriers that transport persons or property between points in the State. Examples are commute ferry services in the San Francisco Bay and services between California mainland points and Catalina Island. PSCs and VCCs are common carriers and must file requests with the Commission through a formal process. Both carrier types require a “certificate of public convenience and necessity” (CPCN) from the Commission for the authority to operate in California.

- **TL-19146 / Resolution Rescinding Commission Resolution TL-19116 that Revoked the Operating Authority of Dan Liviu Ionescu (TCP 11395-P) / Approved at the July 13, 2023 Commission Meeting**
- **A.23-02-017 / Application of CATALINA CHANNEL EXPRESS, INC. (VCC-52), a California Corporation, to increase the baseline rates for its vessel common carrier service and to**

/retain its existing Zone of Rate Freedom. / **07/25/2023 Prehearing Conference set for 08/31/2023.**

- **A.23-07-001** / Application of California Wine Tours, Inc. (PSC-9679) to Abandon Scheduled Passenger Stage Corporation Service Between Points in Napa, Sonoma, Vallejo, the San Francisco International Airport, and the Oakland International Airport. / **07/07/2023 Application filed.**
- **A.23-07-002** / Application of Tideline Marine Group, Inc. (VCC-93) to Discontinue Scheduled and Unscheduled Service. / **07/12/2023 Application filed.**
- **A.23-07-009** / In the Matter of the Application of: THE SONOMA COUNTY AIRPORT EXPRESS, INC. (PSC-1120) to modify Applicant's existing Certificate of Public Convenience and Necessity (CPCN) to abandon service between hotels in Sonoma County and wineries located in Santa Rosa, Kenwood and Geyserville. / **07/20/2023 Application filed.**

Joint Agency Collaboration/Outreach/Training

Joint Agency Collaboration. Information sharing and collaboration with other transportation agencies is a critical part of TLAB's work.

- Bi-monthly TLAB Staff and CARB Staff coordination meeting on the Clean Miles Standard
- Monthly TLAB and Department of Motor Vehicles Autonomous Vehicles meeting
- Monthly TLAB Meeting w/ California Highway Patrol

Outreach and Education. TLAB provides outreach and education to potential and current carriers through presentations on application fundamentals at venues such as SFO and LAX, and attendance at functions sponsored by transportation-related organizations such as the Greater California Livery Association and the California Bus Association.

Training. TLAB managers and staff regularly attend all trainings required by the Commission, as well as trainings for developing work skills and industry-specific trainings. For example:

- Cybersecurity Training
- Hot Weather Heat training
- New Employee Training
- Supervisory Development Training

- TCT Phase 1-training
- Ethics Training

TRANSPORTATION ENFORCEMENT BRANCH (TEB)

The Transportation Enforcement Branch (TEB) regulates Charter-Party Carrier of Passengers (TCP) (e.g., limousines, airport shuttles, chartered and scheduled bus operators, Transportation Network Companies (TNC)) and vessels in California to safeguard the public by ensuring compliance with Commission General Orders (GO), Public Utilities (PU) Codes, and other applicable laws and regulations. TEB ensures compliance through investigations, enforcement, proactive compliance inspections, and field surveillance and inspections. TEB conducts outreach and training activities for passenger carriers, law enforcement, and prosecutors, on regulations that affect passenger carriers.

Consistent with the Commission's Strategic Directives¹ and Enforcement Policy², TEB developed and utilizes a Safety Management System that is implemented through the following pillars: Transportation Safety Assurance, Transportation Risk Management, and Transportation Safety Promotion.

Transportation Safety Management System

TEB reports the following progress for July 2023, for the following program elements.

Transportation Safety Assurance – Assuring that entities the Commission regulates comply with the law and have sufficient training and resources to ensure the safety of the public, their workers, and the environment. For TEB, this includes Investigations, Carrier Inspections, Field Operations, and related Enforcement Activities.

- **Safety Field Operations**

- Murphys Wine Region
- Napa Valley Wine Region
- Los Angeles International Airport (LAX)
- Long Beach Airport (LGB)
- Oakland International Airport (OAK)
- San Jose Mineta International Airport (SJC)

- **Formal Enforcement Proceedings:**

I.21-12-001/Uber Technologies, Inc., and Uber Black Sub-carriers/ALJ Stevens/Commissioner Shiroma. On December 2, 2021, the Commission opened an Order Instituting Investigation (OII) to determine whether passenger carriers violated any provisions of the Public Utilities Code or other applicable rules and regulations.

¹ [CPUCs Strategic Directives \(ca.gov\)](#)

² [CPUC Adopts Enforcement Policy to Promote Maximum Compliance, Transparency, and Public Safety](#)
CPED Monthly Activity Report / July 2023

- On July 28, 2023: Reply briefs were filed.
- **Consumer Affairs Branch (CAB) Referrals:**
 - Effective June 16, 2023, CAB is responsible for all transportation-related complaints. CAB now processes transportation complaints, maintain consumer complaint statistics, and refers complaints that requires further investigation to TEB. For the month of July, CAB referred eight (8) transportation complaints, all of which were assigned for investigation.

Transportation Risk Management – Continually identifying, assessing, and reducing operational risks through mitigation measures faced or posed by the entities the CPUC regulates.

- Continued with data collection from TEB Field activities for internal operations analysis.

Transportation Safety Promotion – Supporting efforts to assure that the public and regulated transportation entities can make informed choices and know how to respond to unsafe situations. For TEB, this includes Training and Education, Outreach Efforts with Industry and Law Enforcement, and Commission Engagement.

- None to Report

Table 2. TEB Enforcement Activities

12 Month Enforcement Activity	Aug 2022	Sept 2022	Oct 2022	Nov 2022	Dec 2022	Jan 2023	Feb 2023	Mar 2023	Apr 2023	May 2023	Jun 2023	Jul 2023	Total
Open Investigations	72	64	80	77	74	76	70	76	81	74	70	84	N/A
New Investigations	3	11	27	8	7	13	10	15	12	11	8	19	132
Investigations Completed	16	24	9	11	12	9	15	23	8	20	9	16	172
Investigations Open Longer than 6 Months	23	32	21	25	25	23	37	20	34	13	18	11	N/A
% Of investigations Open Longer than 6 Months	32%	50%	26%	32%	32%	30%	52%	26%	42%	18%	25%	13%	N/A
Cease and Desist Notices	16	12	20	13	2	4	5	7	15	8	8	12	122
Warning Letters	1	2	2	0	0	1	1	0	2	4	3	0	16
Telephone Disconnects	0	0	0	0	0	0	0	0	0	0	0	0	0
Citations	1	0	4	7	1	2	4	2	2	4	1	1	29
Civil Compromise Actions	10	22	13	5	0	1	0	1	2	0	2	5	61
Vehicle Impounds	14	19	13	9	1	0	1	1	1	0	5	4	68

**Figure 6. TEB Fines Assessed and Amounts Collected from Investigations
August 2022 – June 2023**

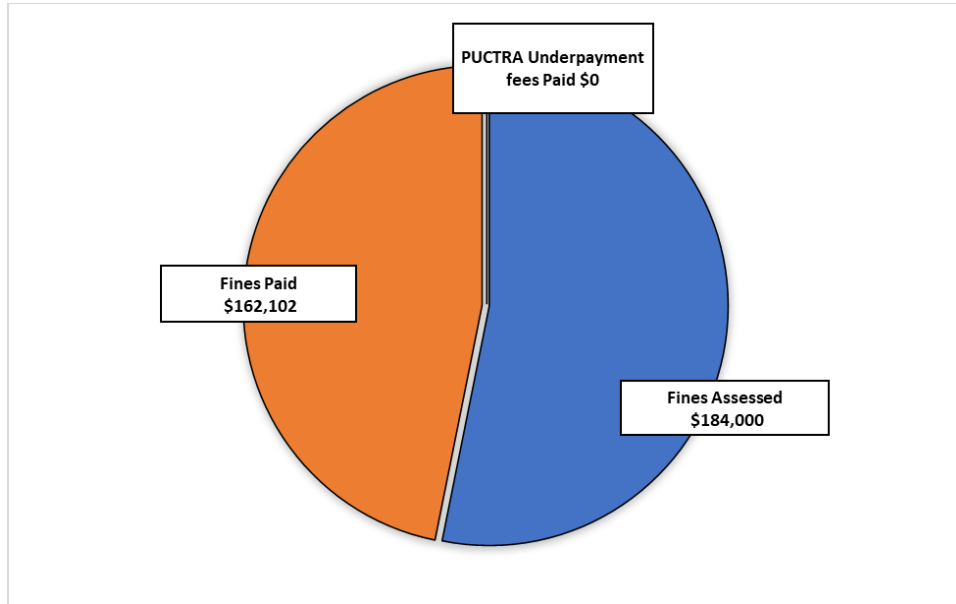


Table 3. Citation Appeal Proceedings

Docket No.	Entity	Status
K.22-11-012	Edwin Torres, North Hollywood, unlicensed	Awaiting an appeal hearing date.
K.23-01-021	Ali B Zanjani dba Royalty Limousine (TCP 16194)	On February 1, 2023, the Acceptance of Appeal Notice from the Docket Office (Appeal File Date: January 25, 2023; Citation T.23-01-001 imposing a \$5,000 fine). A Virtual Evidentiary Hearing took place on February 28, 2023 @ 10AM. No updates waiting for ALJ's decision.
K.23-04-007	Lkhavasuren Dulmaa, Moraga, unlicensed. PSG 5804	On April 12, 2023, an appeal was filed. ALJ Sumner Matthews assigned case on April 18, 2023. Compliance Filing was filed on April 26, 2023. Hearing scheduled for June 22, 2023. Prior to the hearing, Mr. Dulmaa and CPED resolved the citation. Mr. Dulmaa will pay a \$1,000 fine and is working with TLAB to obtain TCP authority. ALJ Mathews accepted the settlement agreement, and instructed Mr. Dulmaa to withdraw his appeal. Parties awaiting ALJ Mathews' final Resolution. No updates for July 2023.

Table 4. TEB Field Operations – Probable Violations and Observation Summary

Month	Transportation Charter-Party (TCP)		Transportation Network Companies (TNC)		Passenger Stage Corporations (PSC)	
	Observed	Probable Violations	Observed	Probable Violations	Observed	Probable Violations
Jul 2023	61	5	25	8	0	0
Jun 2023	79	10	18	5	0	0
May 2023	16	3	335	66	1	0
Apr 2023	204	47	113	47	1	1
Mar 2023	79	22	13	6	2	0
Feb 2023	26	10	69	19	0	0
Jan 2023	144	32	110	85	0	0
Dec 2022	72	14	37	20	0	0
Nov 2022	144	28	46	16	0	0
Oct 2022	78	18	321	49	3	0
Sept 2022	79	17	280	31	11	13
Aug 2022	470	23	562	109	0	0

Table 5. Joint Operations with Law Enforcement Agencies

Agency	Operation
Saint Helena Police Department	TCP, PSC, and TNC passenger carrier operation at Napa.

UTILITIES ENFORCEMENT BRANCH (UEB)

UEB protects California utility consumers from fraud and abuse by developing enforcement mechanisms and ensuring service providers comply with consumer protection laws and regulations. UEB investigates alleged violations by utilities, including communications (both wireline and wireless), energy (both electric and gas), and water companies. When sufficient evidence of violation is uncovered, UEB brings cases before the Commission to seek appropriate penalties and remedies for consumers.

Monthly Highlights

- **TC Telephone (I.22-10-007):** On July 7, 2023, CPED and TC Telephone filed concurrent Opening Briefs addressing issues in the Scoping Memo and Ruling. On July 7, 2018, after TC Telephone filed a motion to include Late-Filed documents in the record, CPED filed a motion to object the late filed evidence and request that the ALJ deny TC Telephone's motion. On July 24, 2023, CPED and TC Telephone filed concurrent Reply Briefs rebutting and countering assertions and allegations made in each party's Opening Briefs.
- **San Diego Community Power (SDCP) Resource Adequacy (RA) Citation Appeal (K.21-03-005):** On July 13, 2023, the Commission issued resolution ALJ-442 denying SDCP's appeal of citation E-4195-0098 issued by CPED on February 3, 2021 in the amount of \$388,288. On July 21, 2023, the Commission received full payment for the citation.
- **Orange County Power Authority (OCPA) RA Citation Appeal (K.22-05-017):** On July 13, 2023, ALJ Petersen issued a ruling ordering the parties to file joint statement of facts and separate legal briefs on commercial impracticability by September 29, 2023.
- **Orange County Power Authority (OCPA) RA Citation Appeal (K.22-10-024):** On July 13, 2023, OCPA filed a motion to compel discovery responses because CPED declined to provide unredacted copies of RA citations that contained confidential information. OCPA asserts that the information is needed to support its affirmative defense that it was impossible for OCPA to satisfy its RA compliance obligations due to the unavailability of conforming RA products. On July 17, 2023, CPED counsel informed OCPA that the Commission issued D.23-06-029 on July 5, 2023, which updated the guidelines for information deemed confidential in the context of RA deficiency matters and what information about RA citations and penalties can be made public by CPED and Energy Division. Consequently, CPED voluntarily agreed to amend its original response to include information pursuant to the guidelines in D.23-06-029 by July 31, 2023. On July 19, 2023, OCPA requested and received approval from ALJ Zhang to modify the procedural schedule. On July 24, 2023, CPED filed its response to OCPA's July 13, 2023 motion, requesting

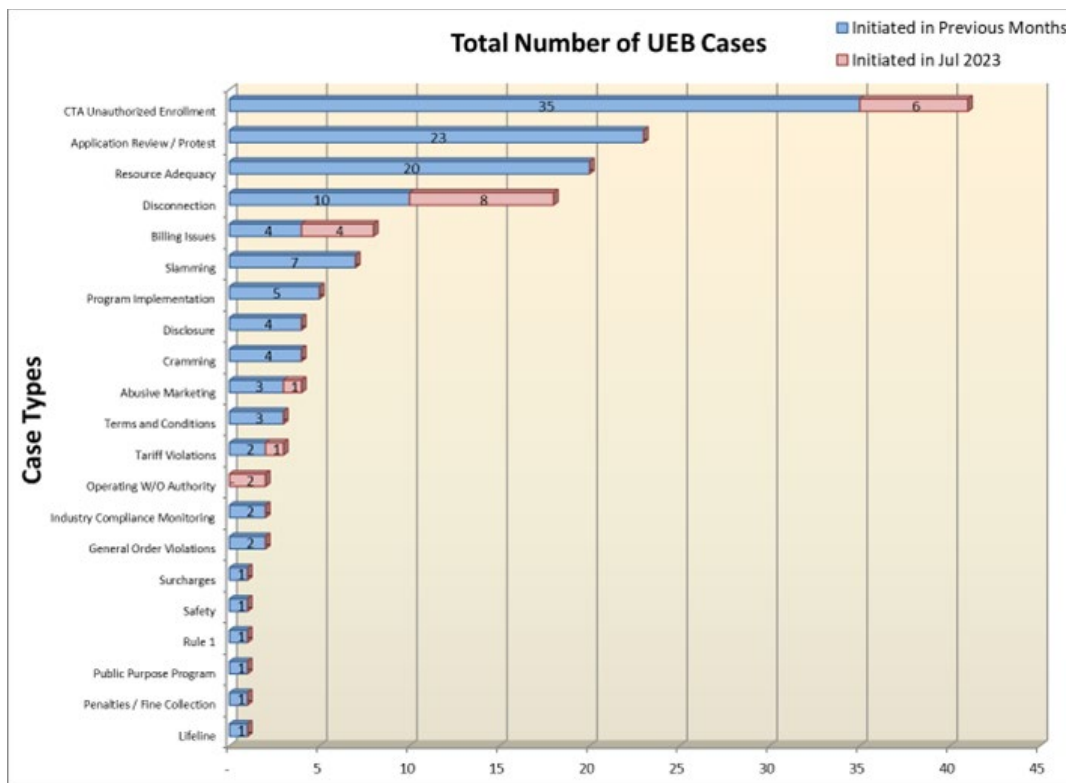
that the ALJ dismiss the motion as the discovery issue is now moot given updated guidelines in D.23-06-029. On July 31, 2023, CPED provided an amended response to OCPA's data request 1.

- **Kloud Communications (A.22-11-011):** On July 18, 2023, CPED and Kloud filed a joint motion requesting that the Commission approve a settlement resolving all issues raised by CPED alleging that Kloud committed a Rule 1 violation in its application. The settlement requires that Kloud agrees to pay a penalty of \$24,000, \$12,000 within thirty days of the date the Commission issues a decision approving the application, and \$1,000 per month thereafter for twelve months.
- **Shell Energy North America (SENA) RA Citation Appeal (K.21-11-018):** On July 26, 2023, ALJ Cai issued a ruling setting the schedule and scope of issues. The deadline to complete discovery is September 26, 2023, and prepared testimony is due October 16, 2023.
- **Desert Community Energy (DCE) RA Citation Appeal (K.23-05-017):** On July 26, 2023, ALJ Chiv issued a ruling setting the schedule and scope of issues. The deadline to complete discovery is September 15, 2023, and prepared testimony is due October 13, 2023.

Key Activities

UEB is working on a total of 152 cases. Investigations center primarily on CTA Unauthorized Enrollment, Resource Adequacy, Application Review/Protest and Disconnection. UEB's cases come from a variety of sources, with Inter-Division referrals and UEB's own scanning activities playing key roles.

Figure 7. UEB Total Number of Cases by Type as of July 31, 2023



Citations/Fines/Reparation

During the month of July 2023, UEB issued two RA Citation totaling \$4,002,938.40.

Cumulative 2023 fines, reparations and penalties imposed are shown below.

Table 6. UEB Fines, Reparations, and Penalties

Date	Citations/Fines/ Reparation
January – June	\$13,740,433
July 2023	\$4,002,938
Cumulative 2023	\$17,743,371

- **Resource Adequacy (RA) Citation Program:**³ UEB issues citations and levies fines to enforce Load Serving Entities’ (LSE) compliance with system, local, and flexible resource adequacy requirements pursuant to Resolution E-4195, as modified by Decisions 10-06-036, Decisions 10-06-038, 11-06-022, 14-06-050, 19-06-026, 20-06-031, 21-06-029, 22-06-050 and 23-06-029. UEB issued two citations totaling \$4,002,938 in July 2023 and received citation payments totaling \$3,209,910.
- **Disconnection Citation Program:** UEB issues citations to enforce compliance with the disconnections-related consumer protection rules in D.20-06-003. This citation program is applicable to Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SoCalGas), collectively referred to as California’s large investor-owned utilities (IOUs).
- **Core Transport Agent (CTA):** UEB reviews CTA-related complaints received by the Commission to enforce compliance with the standards for verification of change in provider requirements in D. 18-02-002, and to identify acts constituting grounds for suspension or revocation of registration pursuant to Pub. Util. Code Section 983.5.

³ “Energy Division consulted with Legal Division and determined that year-ahead RA citations contain market sensitive information related to load serving entities’ net short position. Therefore, Energy Division asked that all information related to year-ahead RA citations be kept confidential until after the final compliance month with deficiencies have passed. As a result, UEB will no longer provide detailed information regarding RA citations issued. Please refer to the Commission’s Website at [Utility Enforcement Branch \(ca.gov\)](https://www.cpuc.ca.gov/utility-enforcement-branch) for publicly available information on RA citations.”

In July, UEB reviewed 69 CTA-related complaints received by the Consumer Affairs Branch (CAB) in June 2023 and identified 13 needing investigation for potential unauthorized enrollment. Staff issued six data requests for proof of enrollment authorization. UEB received proof of enrollment authorization for 11 customers; 2 customers were enrolled prior to Resolution UEB-003. Currently, staff is contacting customers to confirm the legitimacy of proof of authorization and awaiting signed declarations. Therefore, the CTA investigation for June remains open.

Table 7. UEB CTA-Related Complaints

Month Received	CTA-Related Complaints		Data Requests Issued	Proof of Authorization Obtained	Citations Issued	Cease and Desist Letters Issued
	Total Reviewed	Unauthorized Enrollment				
June	69	13	6	11	0	0

Compliance with Ordering Paragraphs

There were no new Ordering Paragraphs added to UEB’s COPS tracker for the month of July. UEB was responsible for 41 separate Ordering Paragraphs. As of July 2023, 41 of the Ordering Paragraphs (representing 100%) have been complied with, thus none are out of compliance.

Ordering Paragraphs related to UEB’s work are attributable to the imposition of fines, adoption of settlements, ordering of consumer refunds or reparation and other remedies and corrective actions, including reporting requirements, resulting from UEB’s investigations of violations of law and wrongdoing against consumers.

The numbers reported above tracks compliance with ordering paragraphs assigned to UEB and do not include tracking for compliance with payment of fines, penalties, surcharges, or the like, which are assigned to Fiscal Office under the COPs system. However, UEB staff also tracks such payments separately in our case management system and informs fiscal of any identified issues.

Table 8. UEB-Related Proceedings

Docket No.	Title	ALJ	Commissioner
R.18-07-005	Order Instituting Rulemaking to Consider New Approaches to Disconnections and Reconnections to Improve Energy Access and Contain Costs.	Kelly	Houck
K.19-03-024	Appeal of San Jose Clean Energy to Citation E-4195-0052 issued on February 27, 2019 by the Consumer Protection and Enforcement Division.	Kim	N/A
K.21-03-005	Appeal of San Diego Community Power to citation E-4195-98 issued on February 3, 2021 by Consumer Protection & Enforcement Division.	Chiv	N/A
K.21-03-006	Appeal of Western Community Energy to citation E-4195-99 issued on February 9, 2021 by Consumer Protection & Enforcement Division.	Wercinski	N/A
K.21-11-018	Appeal of Shell Energy North America to citation E-4195-113 issued on October 21, 2021 by Consumer Protection & Enforcement Division.	Cai	N/A
K.22-05-017	Appeal of Orange County Power Authority to citation E-4195-116 issued on April 20, 2022 by Consumer Protection & Enforcement Division.	Petersen	N/A
K.23-05-017	Appeal of Desert Community to citation E-4195-133 issued on April 17, 2023 by Consumer Protection & Enforcement Division.	Chiv	N/A
K.23-05-019	Appeal of Orange County Power Authority to citation E-4195-134 issued on April 24, 2023, by Consumer Protection & Enforcement Division.	Kelly	N/A
I.22-04-005	Order Instituting Investigation on the Commission's Own Motion into MetroPCS California LLC Failure to Remit Prepaid Mobile Telephony Service Surcharges and User Fees	Mason	Houck
I.22-10-007	Order Instituting Investigation into the Operations and Practices of TC Telephone and Order to Show Cause to Determine Whether Respondents Violated the Laws, Rules, and Regulations Governing the California Universal LifeLine Program	Mason	Shiroma

K.22-10-024	Appeal of Orange County Power Authority to citation E-4195-125 issued on September 16, 2022 by Consumer Protection & Enforcement Division.	Zhang	N/A
K.22-11-007	Appeal of Constellation New Energy to citation E-4195-130 issued on October 7, 2022 by Consumer Protection & Enforcement Division.	Zhang	N/A
A.22-02-020	Application of Dagobah Systems, Inc., dba Dagobah Communications Systems, Inc. for Registration as an Interexchange Carrier Telephone Corporation pursuant to the Provisions of Public Utilities Code Section 1013.	Melvin	Reynolds
A.22-10-005	Application of Digital Future UUC LLC for Registration as an Interexchange Carrier Telephone Corporation Pursuant to the Provisions of Public Utilities Code Section 1013.	Tran	Shiroma
A.22-11-011	Application of Kloud Communications, Inc. for Registration as an Interexchange Carrier Telephone Corporation pursuant to the Provisions of Public Utilities Code Section 1013.	Wilson	Shiroma

Outreach/Training/Other Activities

State National Action Plan (SNAP): On July 13, 2023, the FCC issued a waiver pausing both the phase-out of Lifeline support for voice-only services and the increase in Lifeline minimum service standards for mobile broadband data capacity. This pause will extend until December 1, 2024. Prior to this waiver, support for services meeting only the voice minimum service standard, which currently stands at \$5.25 per month, would be eliminated in most areas on December 1, 2023. Additionally, the minimum service standard for mobile broadband data capacity would rise from 4.5 GB to 20 GB per month beginning December 1, 2023. The FCC found good cause to extend this pause for an additional year to understand the impact of the Affordable Connectivity Program (ACP) on Lifeline subscribers' use of their Lifeline benefit. This pause will give the FCC the opportunity to fully consider the results of the inaugural ACP transparency data collection and the recommendations presented in the "Future of USF Report".