



# Stage 1 Business Analysis

California Department of Technology, SIMM 19A.3 (Ver. 3.0.9, 02/01/2022)

## 1.1 General Information

**1. Agency or State Entity Name: 8660 - Public Utilities Commission**

If Agency/State entity is not in the list, enter here with the [organization code](#).

[Click or tap here to enter text.](#)

**2. Proposal Name and Acronym: CAB Integrated Telephony (CIT)**

**3. Proposal Description: (Provide a brief description of your proposal in 500 characters or less.)**

Consumer Affairs Branch (CAB) seeks an integrated solution to modernize its operations by 1) improving the completeness and quality of call data and 2) enhancing utility and consumer web access.

The current system limits CAB's ability to perform critical tasks, hindering service delivery and data accuracy. The proposed solution will deliver reliable, timely information to the public and Commission leadership, expand consumer access to CAB services, improve data quality, modernize the Utility portal, and ensure resilience against operational disruptions.

**4. Proposed Project Execution Start Date: 7/1/2026**

**5. S1BA Version Number: Version 2**

## 1.2 Submittal Information

**1. Contact Information**

Contact Name: You-Young "Clover" Sellden

Contact Email: [You-Young.Sellden@cpuc.ca.gov](mailto:You-Young.Sellden@cpuc.ca.gov)

Contact Phone: (628) 217-2518

## 2. Submission Type: **New Submission**

If Withdraw, select Reason: [Choose an item.](#)

If Other, specify reason here: [Click or tap here to enter text.](#)

**Sections Changed, if this is a Submission Update: (List all sections changed.)**

[Click or tap here to enter text.](#)

**Summary of Changes: (Summarize updates made.)**

[Click or tap here to enter text.](#)

3. Attach [Project Approval Executive Transmittal](#) to your email submission.

4. Attach [Stage 1 Project Reportability Assessment](#) to your email submission.

## 1.3 Business Sponsorship

### 1. Executive Champion (Sponsor)

Title: [Program Manager](#)

Name: [You-Young "Clover" Sellden](#)

Business Program Area: [External Affairs Division, Consumer Affairs Branch](#)

### 2. Business Owner

Title: [Program and Project Supervisor](#)

Name: [Lisa Bass](#)

Business Program Area: [External Affairs Division, Consumer Affairs Branch](#)

### 3. Product Owner

Title: [Contract Manager](#)

Name: [Lewis Ng](#)

Business Program Area: [External Affairs Division, Consumer Affairs Branch](#)

*TIP: Copy and paste or click the + button in the lower right corner on any section to add additional Executive Champions, Business Owners, or Product Owners with their related Business Program Areas as needed.*

## 1.4 Stakeholder Assessment

The Stakeholder Assessment is designed to give the project team an overview of communication channels that the state entity needs to manage throughout the project. More stakeholders may result in increased complexity to a project.

**1. Indicate which of the following are interested in this proposal and/or the outcome of the project. (Select 'Yes' or 'No' for each.)**

State Entity Only: No

Other Departments/State Entities: No

Public: Yes

Federal Entities: No

Governor's Office: Yes

Legislature: Yes

Media: Yes

Local Entities: Yes

Special Interest Groups: Yes

Other: Yes

**2. Describe how each group marked 'Yes' will be involved in the planning process.**

Public – While the public will benefit from the portal enhancements and any published reports, they will not have a part in the planning of this new system.

Governor's Office, Legislature, Media, Local Entities, Special Interest Groups – These parties are key beneficiaries of the project's outcomes from enhanced reports and dashboard access that provide data and insights, to metrics that support decision-making, policy, oversight, and public communication. Though not involved in planning, they will leverage CAB's improved transparency to enhance accountability and visibility of consumer issues.

Other – LifeLine's Third-Party Administrator (TPA) and Partner Organizations – The LifeLine TPA will be engaged in integration design, requirements validation, data alignment, and integration testing. Additionally, utilities and external vendor partners may be included to validate portal functionality and online dashboards. Their involvement will help ensure the system is effective, efficient, and aligns with broader operational needs.

## 1.5 Business Program

**1. Business Program Name:** External Affairs Division, Consumer Affairs Branch

**2. Program Background and Context:** Provide a brief overview of the entity’s business program(s) current operations.

CAB’s current phone system is at least 10 years old and has aged out. The phone system is not connected to our consumer information management system (CIMS), which prevents an individual phone call from relating to or linking to a case in CIMS. This inhibits the ability to perform call monitoring and call data validation. In short, this creates database integrity risk.

Between August 2021 to August 2024, CAB received a total of 93,496 calls. Of those, 91,728 calls were answered, and 69,767 of those calls were entered into CIMS. CAB’s Consumer Affairs Representatives (CAR) entered an average of 76% of the phone calls they answered into the CIMS database. This translates into 16,744 answered phone calls that were responded to but not recorded. Getting CARs to record all call data into CIMS has been a problem for years – a metric CAB tracks regularly. Training and counseling temporarily improved this metric's value, but the rate of call data entry decreases over time as CARs revert to their former practices. Integrating CIMS with telephony software will allow CAB to tie an individual call to a CIMS case number and auto-populate call data elements into the CIMS case record. Such integration between systems would also enable CAB managers and supervisors to 1) better audit phone calls to improve data quality and 2) improve call handling and case processing.

There are three main components to the CAB solution:

1. CAB Complaint System (CIMS)
2. Business Rules Manager (BRM)
3. Utility Portal

### **CAB Complaint System**

CAB’s complaint system, the Consumer Information Management System (CIMS), deployed in 2009, is built on unsupported Oracle technology with vendor support that ended in 2017. Furthermore, no official Microsoft support exists beyond a temporary Chrome workaround, creating serious risks to consumer Personally Identifiable Information (PII) and system stability. In 2024 alone, CIMS experienced an average of 32 days of downtime, diverting IT staff away from innovation projects and delaying complaint resolution. The telephony system does not integrate with CIMS, forcing manual re-entry of call data and preventing complete case auditing. Manual date entry vulnerabilities allow records manipulation, compromising data integrity and skewing performance metrics. Reporting is equally inadequate, as supervisors must export and manually manipulate raw .csv files with over 250 fields, while case comments remain unsearchable and unusable.

CIMS manual date entry enables “gaming” of coding in CIMS. Gaming is defined in this case as manually backdating entries into CIMS by individual Consumer Affairs Representatives (CARs). The date is deleted, and the new date is entered. This form of gaming results in poor data quality and compromises CAB’s performance statistics. While some dates (Sent to Utility, Closed Date, Entered Date) have been “locked down” (i.e., manual entry is disallowed except for Consumer Service Supervisor (CSS) override) in CIMS, other critical dates remain vulnerable to manual

entry. The system should auto-generate every logged date, except for “Receipt Date,” and prohibit manual entry except for CSS override.

## **Business Rule Manager (BRM)**

BRM is an Oracle application implemented for CIMS in 2013 to ensure that case coding relationships between fields such as source type, case type, utility type, case disposition, subcategory, and other fields (a total of 40 fields) conform with each other. BRM is a type of data dictionary for pick lists and other data fields. Any new system must include BRM functionality.

## **Utility Portal**

The Utility Portal allows CIMS to send Informal Complaints, Supplemental Informal Complaints, and Reopened Supplemental Informal Complaints to utilities participating in the Utility Portal. CIMS and the Utility Portal are integrated with each other. The utilities send their responses to the three types of Informal Complaints back to CIMS via the Utility Portal. Transmissions are batch-processed and occur once per day. The utility correspondence that passes through the utility portal contains customer identifying information and sensitive utility information. The CPUC is required by law to protect this information.

The Utility Portal must be replaced for three main reasons:

1. The Utility Portal’s security protocols are inadequate and potentially compromise customer identifying information and sensitive utility information.
2. The Utility Portal software is not supported. It cannot be upgraded or modified.
3. The Utility Portal is functionally inadequate and has additional issues detailed below that cannot be addressed.

### Inadequate Security Protocols

The Utility Portal contains very minimal security protocols, allowing unauthorized users to access the information in the Utility Portal and thus resulting in unauthorized changes. While all the utilities with access to the Utility Portal have unique usernames, all accounts may potentially share the same password. CIMS stores usernames and passwords in an unencrypted table, making the Utility Portal potentially hackable by unauthorized users. Password rules are minimal, with all passwords consisting of only digits and no letters or special characters. Lastly, users share passwords within each utility, allowing access to the Utility Portal by users who may no longer belong to the utility. There are approximately 4,500 utilities that have access to the portal. Of these utilities, approximately 450 have accessed the Utility Portal within the last three years.

### No support

The Utility Portal provides limited to no control of the Portal to the Web Portal Administrator (WPA) in CAB. The Utility Portal does not have any online help. Instead, help requests are sent directly to the WPA. If there is an issue that the WPA cannot resolve, the protocol is to file an internal CPUC IT ticket, which will be assigned to the Oracle Applications Development Team. Because the Oracle Applications Development Team did not develop the Utility Portal, and because it is written using technology not supported by CPUC's IT division, the support necessary to resolve high-level issues cannot be provided.

### Functionally Inadequate

- No Historical Listing of Cases
  - The Utility Portal does not allow a utility to track or retrace its submitted responses to cases because the system removes the responses from it once they are transferred back to CIMS.
- Follow-ups Are Difficult
  - The Utility Portal has no separate page where utilities can view cases with submitted responses. Once a utility submits a response, the portal status will show "Submitted" for up to 24 hours before the case is removed from the case list. Due to system limitations, the system will retain cases that a utility has responded to in the Portal for 30 days. The utility can pull up a case to see what the complaint is about, but they can't provide additional follow-up responses unless the assigned CAR issues a Supplemental Informal Complaint (SIC). The issuance of a SIC is often directed to the WPAs who act as intermediaries. Depending on the issue's nature, WPAs spend significant time, about 30 to 45 minutes, researching and troubleshooting each reported incident. This occurs at least once a month.
  - Smaller utility companies that do not check their Utility Portal regularly are unaware of reminder notices sent by CARs. Alerting these utilities by means of sending direct emails to their primary contact could be built into a new system.

### **3. How will this proposed project impact the product or services supported by the state entity?**

#### Maximize Customer Service and Stakeholder Accessibility

CAB manages referrals and data requests from legislators, OGA, media, and other divisions through multiple disconnected email inboxes and web forms. This scattered approach increases the risk of lost communications and makes reporting difficult. A consolidated portal for stakeholders will provide a single access point, ensure that all inquiries are tracked, and enable consistent, coordinated responses. This will strengthen accountability and improve service across the Commission.

#### Cost Savings and Risk Reduction

CIMS depends on a shrinking pool of Oracle programmers, with most maintenance now falling to a single staff member. This creates a critical skills gap and makes system stability unsustainable. The lack of integration also forces Consumer Affairs Representatives to manually compare data across separate applications, often using multiple monitors, which increases data integrity risks. Replacing this environment with a secure, modern platform will reduce maintenance costs, safeguard consumer PII, and ensure continuity of operations.

### Enhanced Trust and Public Service

Consumers today must call during business hours or rely on outdated channels like fax or letters to access case information. More than one-fifth of calls to CAB are simply consumers checking the status of their complaints, which reflects both frustration and inefficiency. A modernized portal will allow consumers to securely log in, track case status, send and receive correspondence, and access services at all times. This expanded access improves transparency, reduces call volume, and builds confidence in CPUC's ability to respond quickly and fairly.

### Improved Business Efficiency

The current system relies on an obsolete Oracle database with support that ended in 2017, an unsupported consumer portal, and no integration between telephony and CIMS. This creates delays, excessive downtime averaging 32 days in 2024, and forces staff into manual workarounds that consume valuable time and increase error rates. An integrated solution will connect call center software directly with the complaint database, automate reporting, and eliminate duplicative processes. This will improve case intake, speed resolution, and allow IT staff to focus on innovation rather than system recovery.

*TIP: Copy and paste or click the + button in the lower right corner to add Business Programs, with background and context and impact descriptions as needed.*

## 1.6 Project Justification

### 1. Strategic Business Alignment

#### **Enterprise Architect**

Title: Enterprise Architect

Name: Michael Bonner

Strategic Plan Last Updated: 2/27/2020

Strategic Business Goal: SD-04 – Supporting and Empowering Consumers

Alignment: CAB intends to:

- Educate and assist consumers with the services they use, ensure accuracy and accessibility of consumer and rate information from regulated entities so that consumers can make informed choices, minimize costs, and gain fair value from service providers.
- Assist customers in filing, tracking, and resolving complaints; monitor trends; and prosecute violations of law or CPUC rules, including instances of fraud and abuse.

Strategic Business Goal: SD-08 – Administration

Alignment: CIT will:

- Maximize efficiency and effectiveness of the agency where possible.
- Protect confidential, sensitive, or personally identifiable information.
- Use modern technology to help CPUC employees perform their jobs effectively.
- Establish, maintain, and test business continuity plans for operational interruptions or emergencies.

Strategic Business Goal: SD-09 – Communication and Engagement

Alignment: CIT will:

- Communicate the CPUC's role in facilitating the safe, affordable, reliable, and environmentally sound delivery of services by regulated entities to diverse stakeholders.
- Provide the public with accurate information and documents in a timely manner.

Strategic Business Goal: SD-12 – Risk Management

Alignment: CIT will:

- Prioritize risks of most significant concern, in light of their likelihood, severity, and available options for their mitigation.
- Test and verify the effectiveness of the CPUC's managerial controls and operations.

*TIP: Copy and paste or click the + button in the lower right corner to add Strategic Business Goals and Alignments as needed.*

**Mandate(s):** State

Bill Number/Code, if applicable:

Public Utilities Code Section 311.4 (a)

Add the Bill language that includes system-relevant requirements:

Directs the Commission to establish procedures to permit the submission of informal complaints using electronic means, that is, email or the Internet, or both. (Section 311.4(c)). The Commission shall permit informal complaints through electronic means as long as both conditions are met: (1) the dollar amount in the complaint does not exceed the jurisdictional limit of a small claims court claim as specified in the Code of Civ. Procedure §§ 116.220(a) or 116.221, and (2) the Commission has addressed any impediments in the electronic system that would prevent or substantially adversely affect the ability of the Commission to receive complaints by electronic means.

Bill Number/Code, if applicable:

Public Utilities Code Section 311.4(e)(1) and (2). Section 311.4(g)

Add the Bill language that includes system-relevant requirements:

Requires the Commission to make an industry-specific online complaint form available to the public that allows a customer to specify information that the Commission determines to be relevant to resolve a dispute, including the account number, type of dispute, and opportunity to make general comments. Section 311.4(d) requires the Commission to “immediately forward the complaint to the entity names in the complaint.” **Resolution No. CSD-5** delegates to the Director of CSD the authority to implement new technologies and process changes as they occur, determine the appropriate CAB contact information, and require all utilities and other entities under the jurisdiction of the Commission to make changes to information on the documents specified when the changes pertain only to providing consumers with CAB contact information.

Bill Number/Code, if applicable:

Public Utilities Code §§ 1702 & 1702.1; CPUC Rules of Practice & Procedure (Rule 4.6)

Add the Bill language that includes system-relevant requirements:

Establish CPUC’s complaint jurisdiction and processes, including informal resolution and expedited complaint procedures. This allows CAB’s Telephony and case-management systems to support better logging, triage, and forwarding of complaints that enter via phone to meet these procedural obligations.

Bill Number/Code, if applicable:

State Records Management Act (Gov. Code §§ 12270–12279)

Add the Bill language that includes system-relevant requirements:

Requires state agencies to maintain official records programs, including retention, audit, and destruction policies. Call recordings, complaint logs, and case metadata become state records, requiring a telephony/CRM system that can retain, search, and export per schedule.

*TIP: Copy and paste or click the + button in the lower right corner to add Bill Numbers/Codes and relevant language as needed.*

## 2. Business Driver(s)

**Financial Benefit:** [Yes](#)

Increased Revenue: [No](#)

Cost Savings: [Yes](#)

Cost Avoidance: [Yes](#)

Cost Recovery: [No](#)

Will the state incur a financial penalty or sanction if this proposal is not implemented? [No](#)

If the answer to the above question is “Yes,” please explain:

[Click or tap here to enter text.](#)

### Improvement

Better Services to the People of California: [Yes](#)

Efficiencies to Program Operations: [Yes](#)

Improved Equity, Diversity, and/or Inclusivity: [Yes](#)

Improved Health and/or Human Safety: [Yes](#)

Improved Information Security: [Yes](#)

Improved Business Continuity: [Yes](#)

Improved Technology Recovery: [Yes](#)

Technology Refresh: [Yes](#)

Technology End of Life: [Yes](#)

## 1.7 Business Outcomes Desired

**Executive Summary of the Business Problem or Opportunity:**

CAB's Consumer Information Management System (CIMS), deployed in 2009, is built on unsupported Oracle technology, with vendor support that ended in 2017. The system is obsolete, unstable, and increasingly difficult to maintain, with most programming work dependent on a single staff member due to the loss of Oracle expertise. In 2024, CAB's critical systems experienced over 100 days of downtime: CIMS (32 days), Oracle Discoverer database (32 days), and the Utility Portal (36 days). These disruptions diverted IT resources from innovation, delayed complaint processing, weakened data integrity, and created significant risks to consumer service and public trust.

CIMS does not integrate with CAB's call center software, forcing staff to manually enter and reconcile phone contact data with complaint records. This leads to incorrect entries, missing data, and a lack of real-time visibility into consumer interactions. Reports must be manually generated across multiple databases, creating inefficiencies, delaying response times, and compromising data integrity. As a result, over one-fifth of consumer calls are status-check inquiries that could be resolved through better self-service tools.

Upgrading or replacing CIMS with an integrated, modern platform provides a critical opportunity to address these **issues** while transforming CAB's operations. A holistic solution would:

- Automatically capture consumer case data at the point of phone contact, eliminating gaps and errors.
- Modernize the portal to allow consumers to track cases, receive updates, and communicate securely online.
- Enable seamless data sharing with utilities and partner divisions for faster, coordinated responses.
- Provide reliable, user-friendly reporting tools that improve transparency and stakeholder access to accurate information.

Without this modernization effort, CAB faces mounting risks to consumer data, diminished public trust, escalating maintenance costs, and continued service inefficiencies. If left unaddressed, outages and manual workarounds will continue to consume hundreds of staff hours annually, increase operational costs, and erode confidence among consumers, utilities, and policymakers.

**Objective ID: 1**

**Objective:** Decrease time spent to re-enter complaints from web site to the Complaint System.

**Metric:** Time to transfer complaints

**Baseline:** 40 hours/month

**Target Result:** 0 hours/month

**Objective ID: 2**

**Objective:** Auto-route and reduce reviews of all incoming Web portal complaints/inquiries. E.g. urgency, utility, category, etc.

**Metric:** Time to review and route portal complaints

**Baseline:** 20-40 minutes/day

**Target Result:** 10 minutes/week

**Objective ID:** 3

**Objective:** Offer callers a call back rather than have callers wait on hold in the IVR. The system would schedule the call back with a time range. This would reduce/eliminate caller hold times.

**Metric:** Minutes on hold per call.

**Baseline:** 10 minutes/call

**Target Result:** 0 minutes/call

**Objective ID:** 4

**Objective:** Decrease time to develop real-time (telephony) reporting of phone reps. Currently, when preparing data for the quarterly report - CAB must conduct time-consuming data manipulation to produce the report.

**Metric:** Duration to create management telephony report.

**Baseline:** 12 hours

**Target Result:** 5 minutes

**Objective ID:** 5

**Objective:** Auto-assign geocoding centroid to non-validated address - based on zip code + city match. Reduce time to manually geocode non-validated addresses.

**Metric:** Time to apply centroid to unvalidated addresses - about 150/quarter

**Baseline:** 5-6 hours/quarter

**Target Result:** 0 hours/quarter

**Objective ID:** 6

**Objective:** Reduce time to generate weekly and monthly Rep Report Card reports

**Metric:** Time to generate, merge, and clean up CIMS and Telephony reports to create a single Rep Report Card report every week and once/month.

**Baseline:** 28 hours/month

**Target Result:** 1 hour/month

*TIP: Copy and paste or click the + button in the lower right corner to add Objectives as needed. Please number for reference.*

*TIP: Objectives should identify WHAT needs to be achieved or solved. Each objective should identify HOW the problem statement can be solved and must have a target result that is specific, measurable, attainable, realistic, and time bound. Objective must cover the specific. Metric and*

Baseline must detail how the objective is measurable. Target Result needs to support the attainable, realistic, and time-bound requirements.

## 1.8 Project Management

### 1. Project Management Risk Score: 1.3

Follow the instructions in [Statewide Information Management Manual \(SIMM\) Section 45, Appendix B, Project Management Risk Assessment Preparation Instructions](#).

Attach a completed [Statewide Information Management Manual \(SIMM\) Section 45 Appendix A Project Management Risk Assessment Template](#) to the email submission.

### 2. Project Approval Lifecycle Completion and Project Execution Capacity Assessment

Does the proposal development or project execution anticipate sharing resources (state staff, vendors, consultants, or financial) with other priorities within the Agency/state entity (projects, PALs, or programmatic/technology workload)?

**Answer:** Yes

Does the Agency/state entity anticipate this proposal will result in the creation of new business processes or changes to existing business processes?

**Answer** (No, New, Existing, or Both): Both New and Existing Processes

## 1.9 Initial Complexity Assessment

### 1. Complexity Assessment (Business Score): 2.2

Follow the instructions in the [Statewide Information Management Manual \(SIMM\) Section 45 Appendix D Complexity Assessment Instructions](#).

Attach a completed [Statewide Information Management Manual \(SIMM\) Section 45 Appendix C Complexity Assessment Template](#) to the email submission.

NOTE: Business complexity is initially completed in PAL Stage 1. Technical complexity is initially completed in PAL Stage 2.

### 2. Noncompliance Issues: Indicate if your current operations include noncompliance issues and provide a narrative explaining how the business process is non-compliant.

Programmatic regulations: No

HIPAA/CIIS/FTI/PII/PCI: No

Security: No

ADA: No

Other: No

Not Applicable: [No](#)

Noncompliance Description:

[Click or tap here to enter text.](#)

### 3. Additional Assessment Criteria

If there is an existing Privacy Threshold Assessment/Privacy Information Assessment, include it as an attachment to your email submission.

How many locations and total users is the project anticipated to affect?

Number of locations: 2

Estimated Number of Transactions/Business Events (per cycle): 92,000 per year (Virtual Contact Center (VCC) + CIMS - 43,000 per year, Utility portal - 43,000, Informal Complaints + Consumer Inquiries + Leg inboxes - 5000, Discoverer/Public Request Act (PRA) requests - ~1000)

Approximate number of internal end-users: 50

Approximate number of external end-users: 50,000 (Utility portal - 4500 Utilities, VCC+CIMs - 43,000, Informal Complaints + Consumer Inquiries + Legislative inboxes - 5000 inquirers, PRAs requestors - 250)

## 1.10 Funding

### Planning

1. Does the Agency/state entity anticipate requesting additional resources through a budget action to **complete planning** through the project approval lifecycle framework? [No](#); [planning funds from internal agency resources.](#)

If Yes, when will a budget action be submitted to your Agency/DOF for planning dollars?

[Click or tap to enter a date.](#)

2. Please provide the Funding Source(s) and dates funds for planning will be made available:

[Fund 0462, 4/1/2025](#)

### Project Implementation Funding

1. Has the funding source(s) been identified for **project implementation**? [Yes](#)

If known, please provide the Funding Source(s) and dates funds for implementation will be made available:

[Fund 0462. BCP, 7/1/2026.](#)

Will a budget action be submitted to your Agency/DOF? [Yes](#)

If “Yes” is selected, specify when this BCP will be submitted: Spring/Fall 2026.

2. Please provide a rough order of magnitude (ROM) estimate as to the total cost of the project:  
[Between \\$10 Million and \\$50 Million](#)

**End of agency/state entity document.**

**Please ensure ADA compliance before submitting this document to CDT.**

**When ready, submit Stage 1 and all attachments in an email to [ProjectOversight@state.ca.gov](mailto:ProjectOversight@state.ca.gov).**

## Department of Technology Use Only

Original "New Submission" Date: [12/8/2025](#)

Form Received Date: [1/30/2026](#)

Form Accepted Date: [1/30/2026](#)

Form Status: [Completed](#)

Form Status Date: [2/27/2026](#)

Form Disposition: [Approved](#)

If Other, specify: [Click or tap here to enter text.](#)

Form Disposition Date: [2/27/2026](#)

Department of Technology Project Number (0000-000): [8660-099](#)