

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Application of Southern California Edison Company (U 338-E) for Approval of its 2012-2014 California Alternate Rates for Energy and Energy Savings Assistance Programs and Budgets.	Application 11-05-017 (Filed May 16, 2011)
Application of Southern California Gas Company (U904G) for Approval of Low-Income Assistance Programs and Budgets for Program Years 2012-2014.	Application 11-05-018 (Filed May 16, 2011)
Application of Pacific Gas and Electric Company for Approval of the 2012-2014 Energy Savings Assistance and California Alternate Rates for Energy Programs and Budget (U39M).	Application 11-05-019 (Filed May 16, 2011)
Application of San Diego Gas & Electric Company (U902M) for Approval of Low-Income Assistance Programs and Budgets for Program Years 2012-2014.	Application 11-05-020 (Filed May 16, 2011)

**NOTICE OF EX PARTE COMMUNICATION**

BILLY BLATTNER

Manager of Regulatory Relations  
**SOUTHERN CALIFORNIA GAS COMPANY**  
**SAN DIEGO GAS & ELECTRIC COMPANY**  
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March 4, 2013

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Application of Southern California Edison Company (U 338-E) for Approval of its 2012-2014 California Alternate Rates for Energy and Energy Savings Assistance Programs and Budgets.	Application 11-05-017 (Filed May 16, 2011)
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**NOTICE OF EX PARTE COMMUNICATION**

In accordance with Rule 8.3 of the Commission’s Rules of Practice and Procedure, Southern California Gas Company (SoCalGas) and San Diego Gas and Electric Company (SDG&E) hereby give notice of the following *Ex Parte* communication in the above proceedings.

On Wednesday, February 27, 2013, at 10:00 a.m. at the City of Burbank City Council Chamber, located at 275 East Olive Avenue in Burbank, California, Carmen Rudshagen, SoCalGas CARE and Assistance Programs Manager; Andrew Steinberg, SoCalGas Customer Programs Regulatory Policy and Reporting Manager; Irma DePratti, SDG&E Energy Programs Supervisor; and Rebecca Eaton, external consultant to the utilities regarding federal and state low income customer assistance programs, met with Commissioner Catherine J.K. Sandoval and Colette Kersten, Advisor to Commissioner Sandoval. Other attendees are listed in the LIOB Sign-In Sheet. See Attachment A. The meeting was initiated by the Commission as part of the

regularly scheduled Low-Income Oversight Board meeting. Communication was oral and written. See Attachment B.

Rebecca Eaton gave a presentation describing the study performed by ICF International on behalf of SoCalGas, SDG&E, Southern California Edison (SCE) and Pacific Gas and Electric (PG&E) regarding the utilities' list of categorical eligible programs that are used for enrollment purposes for the California Alternate Rates for Energy (CARE) and Energy Savings Assistance (ESA) Programs. This study was previously submitted to the Commission in a joint-utility Advice Letter filing in compliance with Decision (D.) 12-08-044, Ordering Paragraph 88(b).<sup>1</sup> Ms. Eaton also responded to questions regarding inconsistency of non-utility low income programs with the income eligibility guidelines of the CARE / ESA Programs.

Mr. Steinberg explained that the utilities propose to continue the categorical eligibility program as proposed in their Advice Letter, and subject to review by the Commission's Energy Division. Ms. Rudshagen described CARE program operations related to enrollment through categorical eligibility, and the post-enrollment verification of customer program eligibility. Following the presentation of the Division of Ratepayer Advocates on this same subject, Ms. DePratti provided clarification that the utilities did *not* report that none of the categorical eligible programs have income eligibility criteria at or below 200 percent of Federal Poverty Guidelines.

Dated this 4<sup>th</sup> day of March, 2013 in Los Angeles, CA.

Respectfully submitted,

KIM F. HASSAN for:

By: \_\_\_\_\_ /s/ *Billy Blattner*

BILLY BLATTNER

Manager of Regulatory Relations  
**SOUTHERN CALIFORNIA GAS COMPANY**  
**SAN DIEGO GAS & ELECTRIC COMPANY**

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<sup>1</sup> SoCalGas Advice Letter 4457, SDG&E Advice Letter 2455-E / 2170-G, SCE Advice Letter 2849-E, PG&E Advice Letter 3361-G / 4186-E.

# **ATTACHMENT A**

# LOW INCOME OVERSIGHT BOARD

Burbank, CA

February 27, 2013

10:00AM - 4:00PM

## SIGN-IN SHEET

NAME (PLEASE PRINT)	AFFILIATION	E-MAIL ADDRESS	PHONE NUMBER
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# LOW INCOME OVERSIGHT BOARD

Burbank, CA

February 27, 2013

10:00AM - 4:00PM

## SIGN-IN SHEET

NAME (PLEASE PRINT)	AFFILIATION	E-MAIL ADDRESS	PHONE NUMBER
Melissa Smith	ACCES	mmartin@acesadmin.com	(310) 351-5742
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Syreeta Gibbs	CPUC - Energy	SY6@cpuc.ca.gov	( )
Zaida Amaya	CPUC - Energy	ZEA@cpuc.ca.gov	( )



# **ATTACHMENT B**



## ***CARE and ESA Program Categorical Eligibility Study***

Prepared for: Low Income Oversight Board  
Burbank, California  
February 27, 2013

Presented by: Rebecca Eaton  
ICF International



# Agenda

- Project Background
- Scope
- CARE/ESA Program Eligibility Guidelines
- Determining Alignment
- Program Comparisons and Level of Alignment



# Project Background

- CPUC requires California IOUs to update list of categorically eligible programs
  - Annual update
  - Ensure consistency with the CARE and ESA Program income eligibility guidelines.
- SoCalGas, in conjunction with the other three California IOUs, issued an solicitation for an independent review to comply with CPUC decision D.12-08-044, which states
  - *“The list must propose to retain and add categorically eligible programs for enrollment in low income programs, as appropriate.”*
  - *As appropriate, the IOUs may also propose to eliminate programs, which do not employ income thresholds consistent with the CARE and ESA Programs.”*
- ICF was awarded the contract; December-mid-January worked to review the current list of categorically eligible programs and evaluate additional prospective programs; February reviewed interested party Protest Letters

# CARE/ESA Eligibility Guidelines



- CARE and ESA Program share the same eligibility guidelines
- There are two methods with which participants can enroll:
  - Income Qualification – Total household income, as defined in General Order 153, must fall within 200 percent of the Federal Poverty Guidelines (FPG) in accordance with PU Code 739.1
  - Categorical Exemption – participants must be enrolled in one of the following state or Federal programs:
    - *Bureau of Indian Affairs General Assistance*
    - *CalFresh/Supplemental Nutrition Assistance Program (SNAP)*
    - *CalWORKs/Temporary Assistance for Needy Families (TANF)*
    - *Head Start Income Eligible (Tribal Only)*
    - *Healthy Families A&B*
    - *Low-income Home Energy Assistance Program (LIHEAP)*
    - *Medicaid/Medi-Cal*
    - *National School Lunch Program (NSLP)*
    - *Supplemental Security Income (SSI)*
    - *Tribal TANF*
    - *Women, Infants, and Children Program (WIC)*



## Scope

- Assessing categorical eligibility and other income-eligible programs to determine consistency with CARE and ESA Programs regarding:
  - Income threshold at or below 200 percent of FPG
  - Income threshold that is applied to a household as a unit of measure, as opposed to an individual or family
  - Inclusions and exclusions for calculating income
- Use publicly available information sources as much as possible to facilitate reference of information sources, among other benefits
- Statewide program applicability



## Defining Household Income

- General Order 153, which defines household as “any individual or group of individuals living together as one economic unit in the same residence”.
- “Total Household Income” [includes all] revenues, from all members of a household, from whatever source derived, whether taxable or nontaxable, including, but not limited to: wages, salaries, interest, dividends, spousal support and child support, grants, gifts, allowances, stipends, public assistance payments, social security and pensions, rental income, income from self employment and cash payments from other sources, and all employment-related, non-cash income.”

# Approach

- Research
  - *58 county and 15 state and federal public assistance programs for low-income populations*
  - *Publicly available information*
  - *Conversations with subject matter experts*
- Interviews
  - *Conducted interviews with IOUs to develop a more complete understanding of the issues surrounding the current operation of the CARE and ESA Programs*
- Comparison
  - *Unit of measure*
  - *Income – Crosswalked non-Federal Poverty Guidelines to FPG – Appendix II*

# Approach

- Matrix
  - *Developed comprehensive data collection matrix to identify and assess low-income assistance programs*
  - *Determined alignment or misalignment with CARE/ESA Program criteria*
- Analysis
  - *Analyzed research and synthesized findings in a written report summarizing key findings and recommendations*
- Documentation
  - *Obtained sample letters of acceptance documents from programs*
- Source listing
- Review of Protest Letters; understand concerns expressed regarding study; clarifications are being provided to help increase mutual understanding



## Summary of Findings

Three programs align with the CARE/ESA Program 200 percent FPG income cap and household unit of measure

- CalFresh/Supplemental Nutrition Assistance Program (SNAP)
- National School Lunch Program (NSLP)
- Women, Infants & Children (WIC) program

However, the three programs have income inclusions and exclusions which are not consistent with the CARE/ESA Programs

Head Start Programs are also close to alignment with CARE and ESA Programs, using 200 percent FPG income cap; however, they use family as a unit of measure instead of household, which is not consistent with CARE/ESA.

