

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

In the Matter of the Application of Sierra Pacific  
Power Company (U 903 E) for Approval of Low-  
Income Programs and Budgets for Program  
Years 2009-2011.

Application 08-07-\_\_\_\_  
(Filed July 1, 2008)

**APPLICATION OF  
SIERRA PACIFIC POWER COMPANY (U903-E)  
FOR APPROVAL OF LOW-INCOME ASSISTANCE PROGRAMS  
AND BUDGETS FOR PROGRAM YEARS 2009 – 2011**

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July 1, 2008

## TABLE OF CONTENTS

I.	INTRODUCTION .....	1
II.	OVERVIEW OF SIERRA PACIFIC POWER COMPANY .....	1
III.	CARE PROGRAM .....	3
	A. BACKGROUND .....	3
	B. PROGRAM GOALS AND BUDGET FOR PY 2009, 2010, AND 2011 .....	4
	1. GOALS .....	4
	2. BUDGET .....	5
	C. PROGRAM ADMINISTRATION .....	6
	1. PROCESSING/CERTIFICATION/VERIFICATION .....	6
	2. ENERAL ADMINISTRATION .....	7
	D. COMMUNITY OUTREACH ACTIVITIES .....	7
IV.	LIEE PROGRAM .....	9
	A. BACKGROUND .....	9
	B. PROGRAM GOALS AND BUDGET FOR PY 2009, 2010 AND 2011 .....	11
	1. GOALS .....	11
	2. BUDGET .....	11
	C. PROGRAM DESIGN .....	17
	D. OUTREACH .....	20
V.	REVENUE REQUIREMENT AND RATE IMPACTS .....	22
	A. SUBSIDY AND BENEFIT COSTS .....	22
VI.	REQUEST TO CONTINUE FUNDING .....	23
VII.	CONCLUSION .....	23
VIII.	STATUTORY AND PROCEDURAL REQUIREMENTS .....	23
	A. RULE 7.1(A) CATEGORIZATION AND PROCEDURAL SCHEDULE .....	24
	B. RULE 2.1 .....	24
	C. RULE 2.2 .....	25
	D. RULE 3.2(a) .....	25
	E. RULE 3.2(b), (c), AND (d) .....	26
IX.	REQUEST FOR RELIEF .....	27

**APPENDIX A - CARE PROGRAM**

TABLE A-1	PY 2007-2011 ACTUAL AND ESTIMATED PARTICIPATION
TABLE A-2	PY 2009-2011 PROPOSED PROGRAM BUDGETS
TABLE A-3	PY 2006-2011 BUDGETS (ACTUAL, ESTIMATED AND PROPOSED)
TABLE A-4	PY 2006-2008 BUDGETS AND EXPENDITURES
TABLE A-5	AVERAGE COSTS FOR ENROLLED CUSTOMERS: OUTREACH, PROCESSING/VERIFICATION/CERTIFICATION, AND GENERAL ADMINISTRATION

**APPENDIX B - LIEE PROGRAM**

TABLE B-1	PY 2006-2011 PROGRAM GOALS
TABLE B-2	PY 2008-2011 ESTIMATED ELIGIBLE
TABLE B-3	PY 2007-2011 ANNUAL ESTIMATED ENERGY SAVINGS
TABLE B-4	PY 2007-2011 LIEE PROGRAM BUDGETS
TABLE B-5	PY 2007-2011 LIEE PROGRAM BUDGETS (INCLUDING CARRY-OVER FUNDS AND PROPOSED INCREASES)
TABLE B-6	PY 2006-2008 LIEE PROGRAM ADMINISTRATIVE BUDGETS AND EXPENDITURES (DETAILED BY CATEGORY)
TABLE B-7	PY 2009-2011 AVERAGE OUTREACH COSTS

**APPENDIX C - REVENUE REQUIREMENT AND RATE IMPACTS**

TABLE C-1	EFFECTIVE AND ESTIMATED CARE AND LIEE SURCHARGES
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**I. INTRODUCTION**

In compliance with Ordering Paragraph No. 3 of the California Public Utilities Commission's ("Commission") Decision ("D.") 07-12-051 in Rulemaking ("R.") 07-01-042, and the May 2, 2008, Assigned Commissioner's Ruling Providing Guidance for the Small and Multi-Jurisdictional Utility ("SMJU") California Alternate Rates for Energy ("CARE") and Low-Income Energy Efficiency ("LIEE") 2009-2011 Budget Applications (the "Ruling"), Sierra Pacific Power Company ("Sierra") respectfully submits this Application for Approval of Low-Income Assistance Programs and Budgets for Program Years ("PY") 2009-2011. In this Application, Sierra seeks approval of its proposed CARE and LIEE program plans, measures and budgets for PY 2009-2011. Additionally, Sierra requests approval to continue the CARE and LIEE programs and funding into PY 2009 if a final Decision has not been issued by the Commission prior to January 1, 2009.

**II. OVERVIEW OF SIERRA PACIFIC POWER COMPANY**

Sierra's California service territory differs greatly from the three major California electric utilities (PG&E, Edison and SDG&E). Sierra's service territory in California is

geographically compact and generally encompasses the western portions of the Lake Tahoe basin. The company serves approximately 46,000 customers in portions of Nevada, Placer, Sierra, Plumas, Mono, Alpine, and El Dorado Counties. However, almost 80% of our customers are located in the Lake Tahoe Basin. Our service territory extends from Portola in the north to Markleeville and Topaz Lake in the south. The biggest population center is the City of South Lake Tahoe. The terrain in our California service territory is mountainous, with elevations ranging from 9,050 feet in Squaw Valley to just under 5,000 feet in Portola. Most of our customers are located at elevations greater than 6,000 feet.

Most of Sierra's California customers are located in the Tahoe Basin. The economy of the Tahoe Basin is dominated by tourism with the major businesses being hotels, motels, and ski resorts. There is little manufacturing or heavy industry. Electric demand usually peaks in the winter during Christmas week. Approximately half of the electricity sold by Sierra is to residential customers. Approximately 50% of Sierra's 41,000 residential customers are second family vacation homes or vacation rentals and therefore ineligible for the CARE LIEE programs.

Sierra is one of six Small or Multi-Jurisdictional Utilities ("SMJU") in California that has significantly smaller program budgets, manpower, and customer bases for recovery of program costs as well as different reporting requirements compared to the large California Investor-Owned Utilities ("IOUs").

Sierra is requesting a total of \$2,171,000 for the PY 2009-2011 Low-Income Assistance programs: \$1,770,000 for CARE program activities, including \$65,000 for program administration and an estimated \$1,705,000 for the CARE benefit subsidies; and \$401,000 for LIEE program activities.

### **III. CARE PROGRAM**

#### **A. BACKGROUND**

Sierra has offered the CARE program to qualified residential customers since 1989, when it was implemented by the Commission following enactment by the State Legislature. The CARE Program assists low-income customers by providing a discount on monthly energy bills at the customer's primary residence. Eligible CARE customers whose qualifying household income does not exceed 200% of the federal poverty income level receive a 20% discount on their monthly energy bills. Sierra has also offered a similar discount to qualified non-profit group living homes under the EXPCARE rate schedule since 1992.

For several years, Sierra has sent out bill inserts twice a year to promote the CARE program. Since 2001, also Sierra prints quarterly messages on residential bills promoting the CARE program. Sierra has continued to use "on hold" phone messages that give the caller a recording promoting the CARE program. In compliance with D.05-07-014, in 2006 Sierra implemented a CARE self-certification program by modifying its twice yearly bill inserts into self-certification applications that include a postage paid return feature. During 2007, Sierra sent out self-certification applications in April and November that resulted in 105 and 189 new CARE customers, respectively. In October 2007, Sierra and Southwest Gas Corporation ("Southwest Gas") co-hosted a luncheon for master-meter owners and managers that resulted in 32 new customers being enrolled in our CARE program.

Prior to 2006, Sierra and Southwest Gas shared lists of CARE customers. This data sharing was suspended in 2006 because the income guidelines for participation in Southwest Gas's CARE program were increased to 200 percent of the federal poverty income level, while the level for other SMJU's, including Sierra, remained at 175 percent.

Sierra was able to resume data sharing with Southwest Gas beginning January 2007 when Sierra's CARE income eligibility became the same level as Southwest Gas, or 200 percent of the federal poverty income level, as ordered in D.06-12-036. As a result of the renewed data sharing, in 2007 Sierra enrolled 507 new CARE customers

Sierra recovers its CARE program costs through the PPP surcharge paid by all non-CARE customers. The CARE program cost is based on the administrative costs and the CARE benefits (discounts) which Sierra is requesting in this Application.

## **B. PROGRAM GOALS AND BUDGET FOR PY 2009, 2010, AND 2011**

### **1. GOALS**

As of May 2008, 2,419 customers were enrolled in Sierra's CARE program. Sierra projects that participation will continue to increase to 2,496 customers by year-end 2008, which will bring the CARE penetration rate to 83 percent. Sierra's estimated growth in CARE customers for 2008 is higher than was initially forecasted in its PY 2007-2008 Application. The primary reason for this higher growth rate is the increase in Sierra's income guidelines, which permitted Sierra and Southwest Gas to resume data sharing. Because of data sharing with Southwest Gas, Sierra's CARE customer count increased by 507 in 2007 and so far in 2008, has resulted in 132 additional CARE customers. D.06-12-036 adopted Sierra's proposed goal of 82.7 percent for PY 2008.

In 2007, Sierra had 2,364 customers participating (78.8 percent participation rate) in the CARE program, out of 3,000 estimated eligible for PY 2008. Sierra's proposed and Commission-adopted target participation goal was 79.6 percent for PY 2007.

Consistent with the Commission's goal to enroll all CARE-eligible customers who wish to participate in the program, Sierra proposes the continuation of data sharing with Southwest Gas, self-certification mailings twice a year, bill inserts twice a year, and the

on-hold phone messages in PY 2009-2011 to encourage CARE enrollment and to retain current customers in the program.

As shown in Table A-1, Sierra's enrollment goal for PY 2009-2011 is to add approximately 130 new CARE customers per year. Those enrollment increases would result in forecasted CARE penetration rates of 88 percent in PY 2009, 92 percent in 2010, and 96 percent in 2011, based on Sierra's 3,000 eligible CARE customers estimated for 2008.

## **2. BUDGET**

To fund its PY 2009-2011 CARE program plans, Sierra proposes an annual administrative budget (excluding benefits) of \$21,000 for PY 2009, \$22,000 for 2010, and \$22,000 for 2011, as outlined in Table A-2. The proposed PY 2009 budget reflects an increase of approximately \$5,400 over the PY 2008 administrative budget of \$15,576 authorized in D.06-12-036. The estimated program benefits amount is also included in the proposed budgets, but the actual cost depends on how many customers participate in the program and their actual energy usage. Table A-3 provides an overview of the CARE program budgets (authorized, recorded and proposed) from PY 2006 -2011. The CARE program is funded through the PPP surcharge and paid through non-participating customers' energy bills.

Table A-4 provides actual expenditures, along with approved budgets, from 2006 and 2007 by line item, as shown in the tables set forth by the Accounting and Reporting Requirements workshop, distributed on April 5, 2004. The 2008 approved budget is also included.

Table A-5 provides actual average costs per enrolled household from 2006 and 2007, along with the estimated average costs from 2008 to 2011, for all major categories of expenses including: Processing, Certification, and Verification; General Administration; and Outreach.

## **C. PROGRAM ADMINISTRATION**

CARE program administrative activities and costs consist of two categories (excluding outreach): (1) Processing/Certification/Verification; and (2) General Administration. The following describes the administration of the program and any changes or improvements proposed to be implemented in this Application based on the categories identified in the SMJU Guidance document issued by the Commission on May 2, 2008.

### **1. PROCESSING/CERTIFICATION/VERIFICATION**

Sierra has maintained a full service contract since January 2002 with the California Department of Community Services and Development ("CSD") located in Sacramento to perform all functions related to the eligibility and re-certification requirements of CARE applicants. These services include low-income verification services, weekly computer printout, notification letters, weekly status report, sub-metered tenants, review of application and related forms and annual re-certification updates. Sierra exceeded its approved Processing/Certification/Verification budget for PY 2007 by \$3,765. Sierra also expects to exceed the approved budget category by \$3,442 in 2008.

On Table A-5 Processing/Certification/Verification costs for PY 2006 through 2011 are shown. The CARE customers reported are as of December 31st of each year because customer counts can increase or decrease from month to month. Average costs estimated for PY 2008-2011 are based on the estimated spending shown Tables A-2 and A-3.

Income eligibility is re-established every year. The cost of re-certification is included in the average Processing/Certification/Verification cost on Table A-5. Self-certification enrollments have no associated costs because income documentation and verification isn't required with the initial enrollment.

## **2. GENERAL ADMINISTRATION**

The General Administration cost category includes expenses related to labor for the CARE program administration and travel to meetings and workshops related to the CARE program. CARE information is provided on some of Sierra's regular monthly billing inserts, so the allocated CARE costs are included in this General Administration category as well. Sierra does not report any of these General Administration Costs as part of its CARE budgets because these costs are included in our General rates.

In 2007, Sierra enhanced its master-metered processes to comply with Assembly Bill ("AB") 2104. This Legislation required utilities to improve the CARE program application process for tenants receiving electric or gas service from a master-meter customer through a submetered system by January 1, 2008. The three main requirements of the legislation require the utility to: 1) directly accept CARE applications from tenants; 2) directly notify and provide renewal applications to tenants; and 3) provide each master-meter customer with a list of tenants who are approved to receive discounts pursuant to the CARE program. Sierra already performs all three of these functions. Nonetheless, Sierra reviewed its existing master-metered CARE tenant procedures and made a few minor modifications to its master-metered processes, including providing each master-meter customer with a list of tenants who are no longer on CARE, in order to comply with all aspects of AB 2104.

### **D. COMMUNITY OUTREACH ACTIVITIES**

Sierra proposes to continue our currently effective outreach strategies for PY 2009-2011. Sierra uses several communications designed to promote the CARE program. Current outreach efforts include:

- Bill inserts,
- Bill messages,
- On-hold messages,

- Informational web page,
- Direct mailings,
- Contractor capitation program,
- Collateral (brochures),
- Utility data share, and
- Community outreach.

Among other actions, Sierra sends out postage-paid self-certification applications to ease the enrollment process for our customers. The CARE program is often promoted jointly with the LIEE and Medical Baseline programs. Outreach materials are translated into Spanish, when applicable.

Sierra continues to electronically share lists of CARE customers with Southwest Gas. This data sharing was suspended in 2006 due to Southwest Gas's increased income guidelines (200 percent) set during the Winter Initiative (D.05-10-044) that were not mandated for the other SMJUs. Data sharing with Southwest Gas resumed in 2007 when Sierra's income guidelines were increased to 200 percent and as a result, in 2008 an additional 132 new CARE customers were identified.

In 2005 Sierra began a capitation program with its weatherization contractor Richard Heath and Associates ("RHA") to provide LIEE applicants with a CARE application. In 2007, RHA submitted 72 new CARE applications and was paid \$12 per applicant. So far in 2008, RHA has submitted 29 new CARE applications. Additionally since 2005, Sierra's customers that receive Home Energy Assistance Program ("HEAP") payments are placed into the CARE program. In 2007, this resulted in 61 new CARE customers.

Sierra plans to continue all of the above-mentioned outreach activities for PY 2009-2011. Sierra will work with Southwest Gas on their joint proposal to expand the

utility data sharing to include master-metered submetered tenants with the goal of identifying more customers eligible for enrollment.

Table A-5 outlines the estimated average outreach costs for PY 2006 – 2011 CARE customers. Sierra estimated the average costs for 2008-2011, according to the estimated spending shown in Table A-2 and A-3.

#### **IV. LIEE PROGRAM**

##### **A. BACKGROUND**

Although LIEE program measures have expanded from simple weatherization measures of the early 1980s to a much broader array of measures intended to increase the energy efficiency of homes for utility customers who own or rent a residence served by the utility—including refrigerator replacement, providing heating and air conditioning equipment and funding operation of “Cool Centers”—weatherization remains the main component of the LIEE program. Together, these measures provide customers with long-term energy savings, lower bills, and increased safety and comfort.

The LIEE program costs are recovered through the Public Purpose Program surcharge on the monthly utility bills of participating and non-participating customers.

During 2007, the Commission updated the policy objectives for the LIEE program in D.07-12-051 “to provide cost-effective energy savings that serve as an energy resource and promote environmental benefits.”<sup>1</sup> The Decision also confirmed the “commitment to ensuring the LIEE programs add to the participant’s quality of life, which implicates equity, energy affordability, bill savings and safety and comfort for those customers who participate in LIEE programs.”<sup>2</sup>

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<sup>1</sup> D.07-12-051, at p.25.

<sup>2</sup> D.07-12-051, p.25.

To achieve these objectives, the Commission adopted a programmatic LIEE initiative to “provide all eligible LIEE customers the opportunity to participate in LIEE programs and to offer those who wish to participate all cost-effective energy efficiency measures in their residence by 2020.”<sup>3</sup> The Commission also emphasized the need to implement the programmatic initiative in conjunction with the California Energy Efficiency Strategic Plan (Strategic Plan).<sup>4</sup> The SMJUs held discussions regarding the programmatic initiative and Strategic Plan with the Energy Division, Division of Ratepayer Advocates and Commissioner Grueneich’s Low-Income Advisor on March 7, 2008.<sup>5</sup>

Sierra’s goal is to implement the programmatic LIEE initiative adopted by the Commission to the extent possible, without increasing customer rates or the utility’s administrative costs.

Sierra began implementing the Direct Weatherization program in 1986 for low income, disabled and elderly customers in our California service territory. The program is a joint venture with Southwest Gas, whose natural gas service territory overlaps Sierra’s electric service territory. Project Go Inc., a community-based organization in Roseville, California has been used by both utilities to reach eligible customers, determine their needs and install appropriate retrofit weatherization measures.

In 2004, Sierra contracted with RHA as its prime administrative contractor to provide technical and administrative program services. These services include direction of outreach and assessments, coordination with Subcontractor(s), installation, education, reporting of program results, and technical consulting. Sierra expected improvements to the LIEE program with this association and has realized those expectations.

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<sup>3</sup> D.07-12-051, p.28.

<sup>4</sup> D.07-10-032 (R.06-04-010).

<sup>5</sup> In addition, Sierra continues to monitor both the Strategic Plan process and R.06-04-010, the rulemaking in which the Commission developed the programmatic LIEE initiative for the major California gas and electric utilities.

Sierra has again contracted with RHA for the year 2008. High density, low-income areas are selected to participate in this weatherization program. Sierra also targets specialized recipients such as low-income senior citizen complexes, because they provide the greatest dollar benefit to one of the neediest groups of customers. These methods have proven both cost effective and beneficial to the communities involved.

## **B. PROGRAM GOALS AND BUDGET FOR PY 2009, 2010 AND 2011**

### **1. GOALS**

Sierra estimates it will assist customers in 140 homes in PY 2008, 140 homes in PY 2009, 153 homes in PY 2010, and 183 homes in PY 2011, as shown in Table B-1. The estimate is based on the number of CARE eligible customers for each year minus the number of homes previously weatherized since 2001 and those projected to be weatherized annually through 2011. Sierra estimates the number of LIEE program-eligible homes in our service territory to be 3,000 for PY 2008, 2,860 for PY 2009, 2,707 for PY 2010, and 2,536 for PY 2011, as shown in Table B-2. Sierra

Sierra has calculated the estimated energy savings for PY 2007-2011, based on the actual measures installed during PY 2007 and number of homes estimated to be assisted during PY 2007-2011. Sierra expects its LIEE program to produce a cumulative savings of 431,349 kWh over those five years. Table B-3 outlines the per year estimated energy savings.

Of those who qualify for the Low-Income Energy Efficiency Program, customers tend to fall into two categories, long-time, older residents on fixed incomes, and short-term, rental residents who work multiple jobs in order to make ends meet. The LIEE program is an essential factor in the ability of these customers to cope with the great increase of energy and cost-of-living expenses experienced in the Lake Tahoe area,. Given the extreme weather conditions typical in the area, weatherization work can

usually be completed only from May through September, which limits the number of customers who could be reached under the program.

In order to achieve the LIEE goals approved by the Commission for the year 2020, Sierra will aggressively utilize the available time and proposes the goals for 2009-2011 that are shown on Table B-1.

For Sierra, the goal numbers provided to its LIEE contractor, and reflected on Table B-1, include the number of “treated” homes that we intend to reach in each of those years. The set of energy efficiency measures that the utility may count as treating include, generally: (1) Weatherization; (2) performance of energy assessments; (3) energy education; (4) replacement of certain appliances, such as refrigerators and air conditioners; and (5) installation of compact fluorescent lightbulbs (“CFLs”).

A smaller subset of treated homes are classified as “weatherized” by Sierra. The following “Big Six” measures generally count toward weatherized units: (a) Ceiling/attic insulation; (b) weather stripping; (c) caulking; (d) low-flow shower heads; (e) water heater blankets; and (f) building envelope repairs that reduce infiltration.

Sierra is limited to providing weatherization measures to homes that use electricity for heating; it may not count energy efficiency measures it implements as “weatherization” for homes heated using primarily natural gas or propane, because Sierra does not provide the primary heating fuel. Sierra provides non-weatherization energy efficiency measures to homes that are not heated with electricity as well as those that are heated with electricity. It should be noted that historically Sierra has not set dwelling goals for its contractors that distinguish between weatherizing and other energy efficiency measures, because most of the homes in Sierra’s service territory use natural gas or propane for heating rather than electricity.

Under the currently adopted definition of a “weatherized dwelling”, it is difficult for Sierra to identify a quantity of dwellings that might receive those measures in order for

Sierra to classify a home as “weatherized”. For this reason, over the program years 2004-2008, Sierra calculated the annual ratio of homes its contractors weatherized to the total number of homes its contractors treated. Sierra calculated an average of those annual ratios and applied this average (22 percent) to its annual goal of treated homes to determine the “weatherized” goal for PYs 2009-2011.

At the core of the “treated” versus “weatherized” issue, however, is that it is rare for electric utilities to provide weatherization qualifying measures, because the vast majority of homes in Sierra’s California service territory are heated with natural gas or propane rather than electricity. As pointed out above, there are other energy efficiency measures that are provided by electric utilities. Some of these are provided at significant cost and energy savings, including replacement of refrigerators and air conditioners, in addition to lower cost measures such as energy assessments, energy education, and installation of CFLs.

To date, the criteria utilities must use to determine the number of dwellings they have “weatherized” is based upon the so-called “Big Six” measures listed above. The Big Six measures are usually attributable to those homes with natural gas heating sources, which excludes the electric utilities. By extension of this definition, companies that provide electric efficiency measures in partnership with a gas utility are not allowed to count these homes as “weatherized”, because in that context the electric utility does not provide a Big Six measure. This places the electric utility at a disadvantage because its total number of completed homes looks disproportionately small.

In order for the electric utilities to provide a more accurate analysis of services provided, Sierra requests that the definitions of the terms be reconsidered at least to include refrigerator replacement toward the count of weatherized homes.

Several unique issues present in Sierra’s service area make 100% penetration for the program difficult to achieve. First, Low-income customers are gradually being

forced out of the Tahoe Basin due to the high cost of living. Second, many of the customers who would income-qualify for the CARE and LIEE programs are seasonal residents who do not reside the area year-round, making them ineligible for the programs. Third, many customers find the income documentation process for the LIEE program unwieldy or excessive, especially when they hold multiple seasonal jobs or work in a non-traditional setting, both of which are common in the Tahoe region. Proof of income for all jobs held during a 12-month period is required for the LIEE program because it is not a self-certifying program. Fourth, customers often confuse the similar CSD and utility programs, believing they should receive additional measures or that they should qualify under different criteria.

Fifth, the cost of living and average income in the Lake Tahoe area is higher than much of the rest of California, thereby making the poverty level higher than standard. In previous years, Sierra and Southwest Gas received special permission from the Commission to use different guidelines for the LIEE program in their Tahoe service territories than those used for the statewide LIEE program. In particular, customers whose income was less than 80 percent of the area's median income could qualify for the LIEE program. In 2003, the Commission began implementing program standardization for all utilities, regardless of size.

Sixth, over half of the homes in Sierra's service territory are second family vacation homes or vacation rentals and therefore ineligible for the program. Seventh, customers who may otherwise qualify for the LIEE program have been served previously, resulting in a shrinking pool of eligible applicants.

Finally, over the past several years in the Lake Tahoe region, one of the greatest obstacles to greater penetration of the LIEE program has been the inability to find licensed, qualified, and willing contractors to provide the appliance repair and replacement work necessary to complete some jobs. Sierra contacted 24 contractors

within the Lake Tahoe region, provided descriptions of the program, and asked them to provide services under the LIEE program. None of the contractors were willing to participate, most citing the busy season, lack of familiarity with Title 24 requirements, and prohibitive cost caps as the reasons that they declined to participate. Project Go, Sierra's sub-contractor for the LIEE program, is the closest CBO Sierra has been able to find. It is located in Roseville, California, approximately 100 miles from Sierra's service territory. This solution is not cost-effective and initially exacerbates insecurities of the local building department inspectors in passing the jobs since they were not familiar with the contractor's work.

## **2. BUDGET**

For the years 2009 through 2011, Sierra proposes a modest budget increase in its LIEE program of 10% per year for increased cost of weatherization materials and labor and to expand the program to meet the 2020 goal. Sierra's proposed annual LIEE budgets of \$121,000, \$133,000 and \$147,000 for 2009, 2010 and 2011, respectively, are shown in Table B-4 and Table B-5. Table B-6 reports PY 2006-2008 LIEE Program Administrative Budgets.

The Commission permits LIEE program funds to be carried-over from previous PYs, as directed in D.03-03-007. Sierra has carried-over \$45,780 from PY 2007 to PY 2008. The carry-over from PY 2006-2007 was \$33,344.

As of the end of PY 2007, Sierra reallocated these funds to the Program cost category of Weatherization, including Energy Education for PY 2008, to appropriately meet the programmatic goal as set forth in D.07-12-051. This shifting of funds by category will allow Sierra to assist more homes and save additional energy.

The majority of Sierra's carry-over funds originated during PY 2004-2006. The main reasons for the accumulation of carry-over funds is attributed to the cost per home decreasing due to the updated requirement for refrigerator replacements (from a 10-year

old or older rule, to a manufacturing date of 1992 or older). Since that policy change to restrict refrigerator replacement, most customers in the Tahoe Basin area only qualify for compact fluorescent lamps and therefore prefer not to participate. Changing to more restrictive program policies reduces program attractiveness to the customer.

The key to program outreach success is the level of public interest generated. In an area like the Tahoe Basin, where the primary heat source is most often natural gas, the draw of electric measures is often less than their natural gas counterparts. Those electric energy efficiency measures most often possible in each home are compact fluorescent lamps and refrigerator replacement. Since the policy change that dictated that refrigerator replacement is limited to those manufactured in 1992 or older, this measure is further restricted. Therefore, while great effort is made to utilize the available funds for each program year, it may require multiple times the outreach effort of its natural gas counterpart to expend similar funds in the Tahoe area.

Sierra has found that the ability to shift funds between LIEE program categories and program years is critical to the success of the program. It allows Sierra to respond to shifting levels of interest in energy efficiency programs, which tends to vary with the level of increases in energy costs and weather. While Sierra works hard to spend its annual budgets, various energy efficiency programs require time to ramp up or ramp down when policies or consumer interests change. Funds are carried over in part because it takes time for the utilities and their contractors to adjust to these changes. The ability to shift funds between program categories and program years enables Sierra to respond to these changes in policies and consumer interest, to eliminate potential program delays, assist more homes, save additional energy, and lower its administrative costs.

For the same reasons that the Commission is moving to a three-year budget cycle for the LIEE program (efficiency and efficacy), Sierra requests that the

Commission continue to grant authority to shift funds between program categories and program years for PY 2009-2011.

### **C. PROGRAM DESIGN**

Sierra has maintained an aggressive weatherization and conservation education campaign for our low-income customers for over two decades. During this time we have worked with other utilities, weatherization contractors, community service agencies and other interested parties to leverage all available resources to do the most effective programs possible. Sierra is proud of this long-standing commitment to our California customers. This program gives customers in Sierra's California service territory many choices and opportunities to better manage their own energy consumption. Low-income customers are particularly well-served through several targeted programs. The LIEE program will provide significant, ongoing assistance, education and access to information that will benefit our customers and will keep Sierra in the forefront of energy efficiency, conservation and other DSM activities.

Sierra has maintained a commitment to provide our low-income customers with direct assistance and the education and information they need to make wise energy decisions. For the communities Sierra serves, improvements in energy efficiency can enhance environmental quality, decrease total energy costs, improve living standards and offer opportunities for a stronger and more competitive economic base. Through the efforts outlined in this Application, Sierra proposes to continue our ongoing commitment to our low-income customers and help them reduce and manage their energy consumption.

Sierra began implementing the Direct Weatherization Program in 1986 for low-income, disabled and elderly customers in our California service territory. The program was a joint venture with those natural gas utilities whose service territory overlapped Sierra's.

The LIEE program was derived from the early Direct Weatherization Program and subsequently the standards and policies (California Weatherization Installation Standards and Statewide Policy and Procedures Manual) were developed by the investor-owned utilities and adopted by the Commission in order to standardize programs. Sierra, with the other SMJUs, received direction to follow these rules and regulations during 2003-2004. Although this standardization effort has been halted, allowing the utilities to formulate their own program designs, Sierra requests that the SMJU's continue to receive programmatic guidance and standards from the Commission in the future because current budget amounts would not allow for the development of new standards and policies manuals.

Sierra uses all possible resources in order to provide customers with the fullest complement of measures. Installation work is provided by a community-based organization in Placer County; Project Go Inc. Project Go is a Low-Income Energy Assistance Program ("LIHEAP") contractor and is also utilized by Southwest Gas in the Tahoe Basin area. This multiple relationship allows Sierra to reach eligible customers, determine their needs through assessments, and install the retrofit weatherization measures. Where possible, they utilize the funding of both programs to ensure that customers receive the maximum number of measures for which they are eligible while keeping shared program costs reasonable.

On the advice of the Commission in 2004, Sierra contracted with RHA to perform program administration services. These services include oversight of outreach and assessment, scheduling, installation, education, and assistance in the reporting of program results. RHA ensures that customers receive all feasible gas and electric measures, facilitates communication between the utilities, and technical consulting where needed.

Higher density areas as well as less populated low-income areas are targeted to participate in this weatherization program. Specialized customer groups such as low-income senior citizen complexes are also targeted as they provide the greatest dollar benefit to one of the neediest groups of customers. These methods have proven both cost effective and beneficial to the communities involved.

Currently under this program, customers are receiving Commission-approved weatherization measures along with energy education, weatherization, and energy efficient refrigerator replacement, when applicable. The electric weatherization measures for the 2007-2008 program year include: energy efficient lighting fixtures, compact fluorescent bulbs, evaporative cooler installation, refrigerators and wall / window air conditioning. If applicable, the following measures also may be installed in homes where electric heating or water heating exists: weather-stripping, caulking, ceiling insulation, low-flow showerheads, water heater insulation, water heater pipe insulation, faucet aerators, outlet cover plate gaskets, duct testing and sealing, evaporative cooler and air conditioner vent covers, and minor home repairs, as outlined in Section 5, Table 5-1 of the 2006 California Statewide LIEE Program Policy and Procedures ("P&P") Manual.

Sierra proposes to maintain the measures adopted by the Commission in the 2006 P&P Manual, with the modification of one measure for PY 2009-2011. The modification would be to increase the total number of compact fluorescent lamps installed per residence from 5 to 10 maximum lamps. The State's Department of Community Services and Development weatherization program has already recognized the energy savings value of this change and has made this modification to its LIHEAP program. Sierra also requests to continue installing all feasible measures in customers' homes as defined by the assessment process.

Sierra, in conjunction with Southwest Gas whenever feasible, plans to extend its current energy education process into PY 2009-2011 in the Tahoe area. During education visits, LIEE program contractors meet with customers in a one-on-one consultation to design individualized energy goals and practices. Customers are provided with materials that include an LIEE program and weatherization guide; customer commitment form with tailored energy saving goals are logged; tracking sheet for monthly energy usage (kWh/dollars); explanation of how to read and understand the electric bill; additional pamphlets discussing energy-saving tips and Sierra's CARE and Medical Baseline programs.

#### **D. OUTREACH**

Sierra utilizes a variety of approaches in its low-income customer outreach in order to ensure the most effective outreach effort. In order to reach a maximum number of customers, Sierra's contractor prepares and direct-mails program information to all of its CARE and non-CARE California customers. This is followed by four or more bill inserts throughout the year.

Upon visiting Sierra's website, residential customers are provided links to all of its California assistance programs, including: LIEE, CARE, Medical Baseline, HEAP (Home Energy Assistance Program), and SAFE (Special Assistance Fund for Energy). Customers are also provided with program details and contact numbers for program enrollment. Sierra makes every attempt to cross-qualify customers for the CARE and LIEE programs given that eligibility requirements for both programs are similar.

Furthermore, Sierra asks its LIEE program contractors to conduct promotional efforts in addition to those conducted by Sierra. These include flyers that are hand-delivered to targeted areas throughout the year by the subcontractor. Posters and flyer copies are printed and displayed in targeted neighborhoods, mobile home park common

areas, grocery stores, public offices, etc. and are hand carried during door-to-door canvassing.

When a customer of either Sierra or Southwest Gas is contacted for inclusion in the LIEE program, every effort is made to qualify the customer for both utilities' programs. Spanish-speaking customers are provided with program assistance via a toll-free number (RHA) or by Spanish-speaking staff of the installation subcontractor.

Sierra monitors the effectiveness of its outreach methods, and finds that direct mailing of its flyers, LIEE contractor canvassing, and collateral pieces (brochures and posters) are currently very successful outreach methods. To track customer response to all methods (to the degree implemented by the investor-owned utilities) would be an expensive action at this time and Sierra prefers to utilize outreach monies for the attainment of new program participants.

In PY 2008 to date, a percentage of customers have contacted the LIEE program contractors, citing their neighbor's or friend's satisfaction with the program as their reason for wishing to enroll. Sierra believes that this type of word-of-mouth recommendation will be the single greatest form of outreach for the program.

In D.07-12-051, the Commission directed the utilities to create a tagline that incorporates a brand name for the LIEE program. While consensus was not reached on the wording of the tagline, Sierra believes that this would serve to help all utilities to capitalize on the word-of-mouth method and supports such an effort. The Universal Lifeline Telephone Service is one such example where customers statewide are helped through a coordinated effort. At the current time, the update of marketing materials to include the tagline has not been included in budget calculations; however, if approved, Sierra will support its implementation.

In order to analyze its outreach costs, Sierra provides Table B-7, which includes the recorded (actual), budgeted and estimated average costs per household for the

2006-2011 program years. The table contains information on the average cost per enrolled customer in addition to the costs for primary residential customers. Sierra believes it is important to include this information because new LIEE customers are culled through its solicitation of all of Sierra's California customers in order to find and enroll new LIEE program participants. Projected outreach costs show some increase due to an increased estimate of customers to be reached and due to rising costs of printing, postage, and distribution.

## **V. REVENUE REQUIREMENT AND RATE IMPACTS**

Sierra reports its CARE and LIEE program costs in the Annual Low-Income Progress Report on May 1 of each year, as directed in D.03-03-007, D.05-07-014, and the Assigned Commissioner Ruling dated May 2, 2008.

### **A. SUBSIDY AND BENEFIT COSTS**

The CARE program costs are recovered from non-CARE customers on an equal cents per kwh basis. Sierra is proposing no change in how it recovers its CARE program costs. CARE program rates are calculated by dividing the annual program cost, including estimated outreach and administrative costs, and estimated CARE benefits by the forecasted kwh sales excluding sales to CARE customers.

The LIEE program costs are recovered through the Public Purpose Program surcharge on the monthly utility bills of both participating and non-participating customers. The LIEE program rates are calculated by dividing the annual program cost by the forecasted total kwh sales. The proposed CARE and LIEE rates are shown on Table C-1. Sierra proposes to implement any rate changes resulting from this proceeding on January 1, 2009, January 1, 2010 and January 1, 2011.

## **B. BALANCING ACCOUNT**

Effective June 1, 1996, the Commission approved a negotiated settlement with Sierra which included the suspension of the CARE surcharge as part of an overall \$2.3 million reduction in revenues. Per the settlement, Sierra suspended entries to the balancing account. In compliance with D.03-03-007, Sierra filed to re-establish the CARE balancing account on April 10, 2003. On August 10, 2007 Sierra received approval to re-establish the CARE balancing account but has not yet implemented it due to limited staff but plans to do so commencing with the new budget cycle beginning in January 2009.

## **VI. REQUEST TO CONTINUE FUNDING**

If there is a delay in issuing a decision on Sierra's PY 2009-2011 Low-Income Assistance Programs Budget Application, Sierra requests authorization to continue LIEE and CARE program activities into PY 2009 using the PY 2009 proposed program funds.

## **VII. CONCLUSION**

Sierra respectfully requests that the Commission authorize the CARE and LIEE program plans and budgets proposed in this Application for PY 2009-2011.

## **VIII. STATUTORY AND PROCEDURAL REQUIREMENTS**

In compliance with Rule 7.1(a) of the Commission's Rules of Practice and Procedure ("Rules"), Sierra must state the proposed category for this proceeding, the need for hearing, the issues to be considered, and a proposed schedule. Sierra must also comply with the general requirements for application under the Commission's Rules. Those general requirements are detailed below.

**A. RULE 7.1(A) CATEGORIZATION AND PROCEDURAL SCHEDULE**

Sierra proposes that this Application be categorized as “ratesetting” pursuant to Rule 1.3(e). Sierra believes that hearings are not necessary. Sierra proposes the following procedural schedule, as did Southwest Gas, to ensure PY 2009 budgets are approved prior to January 1, 2009:

July 1, 2009	Application Filed
August 1, 2008	Protest/responses to application due
To be determined	Prehearing Conference (if applicable)
To be determined	Energy Division Workshop (if applicable)
To be determined	Workshop Report (if applicable)
To be determined	ALJ Proposed Decision
To be determined	Comments on Proposed Decision
To be determined	Reply Comments on Proposed Decision
To be determined	Commission Approval of Final Decision
October 31, 2008	Public Purpose Program Surcharges for January 1, 2009 effective

**B. RULE 2.1**

This application is filed pursuant to the Public Utilities Code and the Commission’s Rules.

Sierra is a corporation organized and existing under the laws of the State of Nevada. Sierra provides retail electric service to the public in northern Nevada and in the Lake Tahoe area of California. Sierra also provides retail gas service in Washoe and Storey Counties, Nevada. Sierra is an electric corporation subject to the jurisdiction of the Commission. It is also a public utility under Nevada law and with respect to its provision of utility service in northern Nevada is subject to the jurisdiction of the Public Utilities Commission of Nevada.

The exact legal name of the Applicant is Sierra Pacific Power Company.

The location of Sierra’s principal place of business is 6001 Neil Road, Reno, Nevada, 89511. Consistent with Rule 1.10, Sierra agrees to accept electronic mail

service of all notices, filings and submittals from the Commission and all parties granted leave to participate in this proceeding. Communications regarding this Application should be addressed to:

Christopher A. Hilén  
Assistant General Counsel  
Sierra Pacific Power Company  
6100 Neil Road  
Reno, NV 89511  
Tel: (775) 834-5696  
Fax: (775) 834-4811  
E-Mail: [chilen@sppc.com](mailto:chilen@sppc.com)

Elena P. Mello  
Team Leader  
Revenue Requirements and FERC  
Sierra Pacific Power Company  
6100 Neil Road  
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Tel: (775) 834-4121  
Fax: (775) 834-4484  
E-Mail: [emello@sppc.com](mailto:emello@sppc.com)

**C. RULE 2.2**

A copy of Sierra's current Articles of Incorporation, as amended and presently in effect, certified by the California Secretary of State, was filed with the Commission in A.92-05-040 and is hereby incorporated in this Application by this reference.

**D. RULE 3.2(a)**

(1) A balance sheet and income statement, as of the latest available date of December 31, 2007, was filed with the Commission as Exhibit A to A.08-04-003 (ECAC) and is hereby incorporated in this Application by reference.

(2) Sierra's current rates and charges for electric service are contained in its respective electric tariffs and schedules on file with the Commission.

(3) The property of Sierra is composed of electric transmission and distribution facilities, generation facilities, electric meters, buildings, motor vehicles, construction equipment, office equipment and related property. A statement of the original cost of Sierra's property, together with a statement of the depreciation reserve applicable to the property is included with Sierra's recent general rate case, Application ("A.") 05-06-018, and is incorporated herein by reference.

(4) A summary of earnings (rate of return summary) on a depreciated rate base and the earnings result for Sierra's total electric utility operations are included in A.08-04-003 and are herein incorporated by reference.

(5) This application only reflects and passes through to customers costs to Sierra for the proposed 2009-2011 Low-Income Program Budget Years expenses related to the CARE and LIEE programs mandated by the Commission.

**E. RULE 3.2(b), (c), AND (d)**

Within ten days after filing this Application, Sierra will: (1) mail notice of the Application to the State of California and to the cities and counties in Sierra's service territory, as listed in the Certificate of Service; and (2) public notice of the Application at least once in a newspaper of general circulation in each of the counties in Sierra's California service territory. Additionally, within forty-five days, Sierra will notify its customers of this Application by including a notice of it within their regular bills.

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## **IX. REQUEST FOR RELIEF**

For all the reasons set forth in this Application, including supporting exhibits as included in Appendices A-C, Sierra respectfully asks the Commission to:

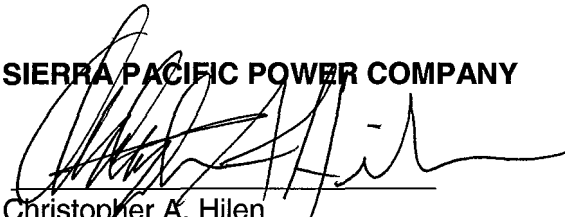
(1) Approve the requested funding and program modifications for Sierra's low-income assistance programs for PY 2009-2011 as proposed herein;

(2) Grant interim authorization to continue CARE and LIEE program activities into PY 2009 utilizing the PY 2009 proposed program funds should there be a delay in issuing a decision on Sierra's Application; and

(3) Grant such further relief as the Commission deems appropriate.

Respectfully submitted this 1<sup>st</sup> day of July, 2008.

**SIERRA PACIFIC POWER COMPANY**



Christopher A. Hilén  
Assistant General Counsel  
6100 Neil Road  
Reno, NV 89511  
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# **APPENDIX A**

## **CARE PROGRAM**

TABLE A-1	PY 2007-2011 ACTUAL AND ESTIMATED PARTICIPATION
TABLE A-2	PY 2009-2011 PROPOSED PROGRAM BUDGETS
TABLE A-3	PY 2006-2011 BUDGETS (ACTUAL, ESTIMATED AND PROPOSED)
TABLE A-4	PY 2006-2008 BUDGETS AND EXPENDITURES
TABLE A-5	AVERAGE COSTS FOR ENROLLED CUSTOMERS: OUTREACH, PROCESSING/VERIFICATION/CERTIFICATION, AND GENERAL ADMINISTRATION

**PY 2007 - 2011 CARE Program Actual and Estimated Participation**  
**Sierra Pacific Power Company**  
**Table A-1**

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)
	Total Enrolled 12-31-07	Total Enrolled Through May 2008	PY 2008 Estimated Eligible	Estimated Net PY 2008 Enrollments	Estimated Year End PY 2008 Participation	Estimated PY 2008 Goal Rate	Estimated PY 2009 Net Enrollments	Estimated Year End PY 2009 Participation	Estimated PY 2009 Goal Rate	Estimated PY 2010 Net Enrollments	Estimated Year End PY 2010 Participation	Estimated PY 2010 Goal Rate	Estimated PY 2011 Net Enrollments	Estimated Year End PY 2011 Participation	Estimated PY 2011 Goal Rate
	[1]		[1]	(Col. F-B)	(Col. B+E)	* (Col. F/D)		(Col. F+H)	[a] (Col. I/D)		(Col. I+K)	[a] (Col. L/D)		(Col. L+N)	[a] (Col. O/D)
	2,364	2,419	3,000	132	2,496	83%	129	2,625	88%	132	2,757	92%	132	2,889	96%

[\*] D.06-12-036 adopted Sierra's proposed goal of 82.7% for PY 2008.

[a] Estimated PY2009, PY2010 and PY2011 Goal Rate will change with updated annual CARE Eligibility information provided in Sierra's Annual Low-Income Progress Report filed May 1st of every year.

[1] Annual Low-Income Progress Report filed May 1, 2008.

**PY 2009 - 2011 CARE Proposed Program Budget**  
**Sierra Pacific Power Company**  
**Table A-2**

<b>CARE Budget Categories</b>	<b>2009 Proposed</b>	<b>2010 Proposed</b>	<b>2011 Proposed</b>
<b>Outreach</b>	\$ 6,000	\$ 6,000	\$ 6,000
<b>Proc./ Certification/ and Verification</b>	\$ 15,000	\$ 16,000	\$ 16,000
<b>General</b>	\$ -	\$ -	\$ -
<b>Total Expenses</b>	\$ 21,000	\$ 22,000	\$ 22,000
<b>CARE Program Discount</b>	\$ 541,000	\$ 568,000	\$ 596,000
<b>Total Program Costs</b>	<b>\$ 562,000</b>	<b>\$ 590,000</b>	<b>\$ 618,000</b>

PY 2006 - 2011 CARE Program Budget (Actual, Estimated and Proposed)  
Sierra Pacific Power Company  
Table A-3

CARE Budget Categories	2006 Authorized	2006 Recorded	2007 Authorized	2007 Recorded	2008 Authorized	2008 Estimated	2009 Proposed	2010 Proposed	2011 Proposed
Outreach	\$ 14,000	\$ 4,578	\$4,330	\$11,056	\$ 4,460	\$ 6,000	\$ 6,000	\$ 6,000	\$ 6,000
Proc./ Certification/ and Verification	\$ 10,485	\$ 9,836	\$ 10,793	\$ 14,558	\$ 11,116	\$ 15,000	\$ 15,000	\$ 16,000	\$ 16,000
General	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Expenses	\$ 24,485	\$ 14,414	\$ 15,123	\$ 25,614	\$ 15,576	\$ 21,000	\$ 21,000	\$ 22,000	\$ 22,000
CARE Program Discount	\$ 225,935	\$ 301,220	\$ 379,912	\$ 407,339	\$ 395,133	\$ 514,000	\$ 541,000	\$ 568,000	\$ 596,000
Total Program Costs	\$ 250,420	\$ 315,634	\$ 395,035	\$ 432,953	\$ 410,709	\$ 535,000	\$ 562,000	\$ 590,000	\$ 618,000

**PY 2006 - 2008 CARE Program Budgets and Expenditures**  
**Sierra Pacific Power Company**  
**Table A-4**

Description	2006 <sup>[1]</sup> Authorized	2006 Recorded	2007 <sup>[1]</sup> Authorized	2007 Recorded	2008 <sup>[1]</sup> Authorized	2008 Estimated
<b>Outreach</b>						
Capitation Fees		\$ 276		\$ 864		
Applications/Inserts		\$ 4,302		\$ 9,879		
Media		\$ -		\$ -		
Other Outreach <sup>[2]</sup>		\$ -		\$ 313		
Other Outreach subsumed in GRC		\$ -		\$ -		
<b>Subtotal Outreach</b>	<b>\$ 14,000</b>	<b>\$ 4,578</b>	<b>\$ 4,330</b>	<b>\$ 11,056</b>	<b>\$ 4,460</b>	<b>\$ 6,000</b>
<b>Processing/Certification/Verification</b>						
Internal						
Outside Services		\$ 9,836		\$ 14,558		
<b>Subtotal Processing/Certification/Verification</b>	<b>\$ 10,485</b>	<b>\$ 9,836</b>	<b>\$ 10,793</b>	<b>\$ 14,558</b>	<b>\$ 11,116</b>	<b>\$ 15,000</b>
<b>General</b>						
Billing System/Programming						
Consulting Services						
Regulatory Compliance						
Travel						
Filings						
Labor Costs (including overhead)						
Incremental						
Other general (please specify) <sup>[2]</sup>						
General costs subsumed in GRC						
<b>Subtotal General</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
<b>TOTAL PROGRAM COSTS</b>	<b>\$ 24,485</b>	<b>\$ 14,414</b>	<b>\$ 15,123</b>	<b>\$ 25,614</b>	<b>\$ 15,576</b>	<b>\$ 21,000</b>
<b>CARE Program Discount</b>	<b>\$ 225,935</b>	<b>\$ 301,220</b>	<b>\$ 379,912</b>	<b>\$ 407,339</b>	<b>\$ 395,133</b>	<b>\$ 514,000</b>
<b>GRAND TOTAL PROGRAM COSTS</b>	<b>\$ 250,420</b>	<b>\$ 315,634</b>	<b>\$ 395,035</b>	<b>\$ 432,953</b>	<b>\$ 410,709</b>	<b>\$ 535,000</b>

[1] As approved in D. 05-07-014 and D.06-12-036.

[2] Other Outreach/General costs are defined as any direct costs that do not fall into the listed subcategories.

**Average Costs For CARE Program Enrolled Customers**  
**Sierra Pacific Power Company**  
**Table A-5**

**AVERAGE OUTREACH COSTS**

	2006	2007	2008	2009	2010	2011
<b>Total CARE Customers <sup>[1]</sup></b>	1,507	2,364	2,496	2,625	2,757	2,889
<b>Outreach <sup>[2]</sup></b>	\$ 4,578	\$ 11,056	\$ 6,000	\$ 6,000	\$ 6,000	\$ 6,000
<b>Average Program Costs</b>	\$ 3.04	\$ 4.68	\$ 2.40	\$ 2.29	\$ 2.18	\$ 2.08

**AVERAGE PROCESSING/CERTIFICATION/VERIFICATION COSTS**

	2006	2007	2008	2009	2010	2011
<b>Total CARE Customers <sup>[1]</sup></b>	1,507	2,364	2,496	2,625	2,757	2,889
<b>Proc./ Certification/ and Verification <sup>[2]</sup></b>	\$ 9,836	\$ 14,558	\$ 15,000	\$ 15,000	\$ 16,000	\$ 16,000
<b>Average Program Costs</b>	\$ 6.53	\$ 6.16	\$ 6.01	\$ 5.71	\$ 5.80	\$ 5.54

**AVERAGE GENERAL ADMINISTRATION COSTS <sup>[3]</sup>**

	2006	2007	2008	2009	2010	2011
<b>Total CARE Customers <sup>[1]</sup></b>	1,507	2,364	2,496	2,625	2,757	2,889
<b>General <sup>[2]</sup></b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Average Program Costs</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

[1] As of December 31 each year.

[2] Costs for PY 2006-2007 reflect actuals. Costs for PY 2008-2011 are proposed.

[3] CARE General Administration Costs are recovered through General Rates.

## **APPENDIX B**

### **LIEE PROGRAM**

TABLE B-1	PY 2006-2011 PROGRAM GOALS
TABLE B-2	PY 2008-2011 ESTIMATED ELIGIBLE
TABLE B-3	PY 2007-2011 ANNUAL ESTIMATED ENERGY SAVINGS
TABLE B-4	PY 2007-2011 LIEE PROGRAM BUDGETS
TABLE B-5	PY 2007-2011 LIEE PROGRAM BUDGETS (INCLUDING CARRY-OVER FUNDS AND PROPOSED INCREASES)
TABLE B-6	PY 2006-2008 LIEE PROGRAM ADMINISTRATIVE BUDGETS AND EXPENDITURES (DETAILED BY CATEGORY)
TABLE B-7	PY 2009-2011 AVERAGE OUTREACH COSTS

**PY 2006 - 2011 LIEE PROGRAM GOALS**  
**SIERRA PACIFIC POWER COMPANY**  
**TABLE B-1**

<b>LIEE Treated (T) and Weatherized (W) Homes</b>																	
<b>2006 Authorized <sup>[1]</sup></b>		<b>2006 Actual</b>		<b>2007 Authorized <sup>[2]</sup></b>		<b>2007 Actual</b>		<b>2008 Authorized <sup>[2]</sup></b>		<b>2008 Estimated <sup>[3]</sup></b>		<b>2009 Utility Projected</b>		<b>2010 Utility projected</b>		<b>2011 Utility Projected</b>	
<b>T</b>	<b>W</b>	<b>T</b>	<b>W</b>	<b>T</b>	<b>W</b>	<b>T</b>	<b>W</b>	<b>T</b>	<b>W</b>	<b>T</b>	<b>W</b>	<b>T</b>	<b>W</b>	<b>T</b>	<b>W</b>	<b>T</b>	<b>W</b>
100	22	84	22	115	25	150	26	115	25	115	25	125	28	140	31	150	33

<sup>[1]</sup> D.05-07-014 approved the SMJUs budget applications for 2005. The Decision also directed SMJUs to file budget applications for PY 2007 and 2008 on July 1, 2006. Thus, the approved 2005 goals were extended in to 2006.

<sup>[2]</sup> No goals were authorized in Decision 06-12-036 (A.06-06-002, et al.). For 2007 and 2008 Sierra proposed weatherizing 115 homes annually in a data response LIEE-2 submitted June 12, 2006.

<sup>[3]</sup> Number includes homes served with carry-over funds.

**PY 2007 - 2011 LIEE PROGRAM BUDGETS**  
**SIERRA PACIFIC POWER COMPANY**  
**TABLE B-4**

	2007 Adopted	2007 Carry- Over (from 2006)	2007 Utility Actual <sup>[1]</sup>	2008 Adopted	2008 Carry- Over (from 2007) <sup>[2]</sup>	2008 Utility Actual	2009 Proposed	2010 Proposed	2011 Proposed
Outreach	\$2,000	\$6,000	\$8,000	\$2,000	\$1,282	\$3,282	\$8,000	\$8,800	\$9,680
Inspections	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
General	\$20,000	\$5,335	\$58,679	\$20,000	\$15,068	\$35,068	\$20,000	\$22,000	\$24,200
Subtotal Administrative	\$22,000	\$11,335	\$33,335	\$22,000	\$16,350	\$38,350	\$28,000	\$30,800	\$33,880
Weatherization <sup>[3]</sup>	\$84,000	\$22,009	\$106,009	\$84,000	\$30,630	\$114,630	\$88,600	\$97,360	\$107,796
Appliance Replacement	\$0	\$0	\$0	\$0	\$0	\$0		\$0	\$0
Energy Education	\$4,000	\$0	\$4,000	\$4,000	-\$1,200	\$2,800	\$4,400	\$4,840	\$5,324
Subtotal Program	\$88,000	\$22,009	\$110,009	\$88,000	\$29,430	\$117,430	\$93,000	\$102,200	\$113,120
<b>Total Program</b>	<b>\$110,000</b>	<b>\$33,344</b>	<b>\$143,344</b>	<b>\$110,000</b>	<b>\$45,780</b>	<b>\$155,780</b>	<b>\$121,000</b>	<b>\$133,000</b>	<b>\$147,000</b>

<sup>[1]</sup> Carry-over funds from 2006 were reallocated to the Weatherization, Outreach and General categories.

<sup>[2]</sup> Carry-over funds from 2007 totaled \$45,780. Sierra reallocated the funds to the program cost category of weatherization to meet the programmatic goal as set forth in D.07-12-051. This shifting of funds will allow Sierra to assist more homes and save additional energy.

<sup>[3]</sup> Sierra includes inspection costs under the Weatherization category.

PY 2007 - 2011 LIEE PROGRAM BUDGETS (INCLUDING EXPECTED CARRY-OVER FUNDS AND PROPOSED INCREASES)  
SIERRA PACIFIC POWER COMPANY  
TABLE B-5

	2007 Adopted	2007 Carry- Over (from 2006)	2007 Total Budget	2007 Spent	2007 Unspent	2008 Adopted	2008 Carry- Over (from 2007) [1]	2008 Total Budget	2008 Utility Expected	Expected 2008 Unspent	2009 Utility Proposed	Increase (Decrease) over 2008 Expected	2010 Utility Proposed	Increase (Decrease) over 2009 Proposed	2011 Utility Proposed	Increase (Decrease) over 2010 Proposed
Outreach	\$2,000	\$6,000	\$8,000	6,718	\$1,282	\$2,000	\$1,282	3,282	\$0	\$3,282	\$8,000	\$8,000	\$8,800	800	\$9,680	\$880
Inspections	\$0		\$0		\$0	\$0	\$0	0	\$0	\$0	\$0	\$0	\$0	0	\$0	\$0
General	\$20,000	\$5,335	\$25,335	10,267	\$15,068	\$20,000	\$15,068	35,068	\$0	\$35,068	\$20,000	\$20,000	\$22,000	2,000	\$24,200	\$2,200
Subtotal Administrative	\$22,000	\$11,335	\$33,335	\$16,985	\$16,350	\$22,000	\$16,350	\$38,350	\$0	\$38,350	\$28,000	\$28,000	\$30,800	2,800	\$33,880	\$3,080
Weatherization [2]	\$84,000	\$22,009	\$106,009	75,379	\$30,630	\$84,000	\$30,630	114,630	\$0	\$114,630	\$88,600	88,600	\$97,360	8,760	\$107,796	\$10,436
Appliance Replacement																
Energy Education	\$4,000		\$4,000	5,200	-\$1,200	\$4,000	-\$1,200	2,800	\$0	\$2,800	\$4,400	4,400	\$4,840	440	\$5,324	\$484
Subtotal Program	\$88,000	\$22,009	\$110,009	\$80,579	\$29,430	\$88,000	\$29,430	\$117,430	\$0	\$117,430	\$93,000	\$93,000	\$102,200	\$9,200	\$113,120	\$10,920
Total Program	\$110,000	\$33,344	\$143,344	\$97,564	\$45,780	\$110,000	\$45,780	\$155,780	\$0	\$155,780	\$121,000	\$121,000	\$133,000	\$12,000	\$147,000	\$14,000

[1] Carry-over funds from 2007 totaled \$45,780. Sierra reallocated the funds to the program cost category of weatherization to meet the programmatic goal as set forth in D.07-12-051. This shifting of funds will allow Sierra to assist more homes and save additional energy.

[2] Sierra includes inspection costs under the Weatherization category.

**PY 2006 - 2008 LIEE PROGRAM ADMINISTRATIVE BUDGETS AND EXPENDITURES**  
**SIERRA PACIFIC POWER COMPANY**  
**TABLE B-6**

Description	2006 <sup>[1]</sup> Authorized	2006 Recorded	2007 <sup>[2]</sup> Authorized	2007 Recorded	2008 <sup>[2]</sup> Authorized	2008 Estimated
<b>Outreach</b>						
Applications/Inserts		\$ 750				
Other Outreach [3]		\$ 2,265		\$ 6,118		
Other Outreach subsumed in GRC		\$ -		\$ 600		
<b>Subtotal Outreach</b>	<b>\$ 3,000</b>	<b>\$ 3,015</b>	<b>\$ 8,000</b>	<b>\$ 6,718</b>	<b>\$ 8,000</b>	<b>\$ 8,000</b>
<b>Inspections [4]</b>						
Outside Services						
<b>Subtotal Inspections</b>						
<b>General</b>						
Billing System/ Programming						
Consulting Services [3]		\$ 5,000		\$ 5,000		
Regulatory Compliance						
Travel		\$ 2,103		\$ 2,272		
Filings						
Labor Costs (including overhead)						
Incremental		\$ -		\$ -		
Subsumed in General Rates						
Other Outside Services		\$ 3,690		\$ -		
Other General [3]				\$ 2,996		
General costs subsumed in GRC						
<b>Subtotal General</b>	<b>\$ 19,000</b>	<b>\$ 10,793</b>	<b>\$ 25,335</b>	<b>\$ 10,268</b>	<b>\$ 25,335</b>	<b>\$ 25,335</b>
<b>TOTAL LIEE ADMINISTRATIVE COSTS</b>	<b>\$ 22,000</b>	<b>\$ 13,809</b>	<b>\$ 33,335</b>	<b>\$ 16,985</b>	<b>\$ 33,335</b>	<b>\$ 33,335</b>
<b>TOTAL LIEE ADMINISTRATIVE COSTS (excluding costs subsumed in GRC)</b>	<b>\$ 22,000</b>	<b>\$ 13,809</b>	<b>\$ 33,335</b>	<b>\$ 16,385</b>	<b>\$ 33,335</b>	<b>\$ 33,335</b>

<sup>[1]</sup> As approved in D.05-07-014 -- Inspections combined with Weatherization and \$1,000 of General Expenses with combined with Outreach.

<sup>[1]</sup> As approved in D.06-12-036 -- Inspections combined with Weatherization and \$6,000 of carry-over to Outreach and \$5,335 of carry-over to General Expense.

<sup>[3]</sup> Other Outreach/General costs are defined as any direct costs that do not fall into the listed subcategories.

<sup>[4]</sup> Inspections combined with Weatherization.

**PY 2009 - 2011 LIEE PROGRAM AVERAGE OUTREACH COSTS**  
**SIERRA PACIFIC POWER COMPANY**  
**TABLE B-7**

**AVERAGE COSTS PER ENROLLED CUSTOMER**

	<b>2006</b>	<b>2007</b>	<b>2008 <sup>[3]</sup></b>	<b>2009</b>	<b>2010</b>	<b>2011</b>
<b>Total LIEE Customers <sup>[1]</sup></b>	106	175	140	153	171	183
<b>Outreach Costs <sup>[2]</sup></b>	\$ 3,015	\$ 6,718	\$ 8,000	\$ 8,000	\$ 8,800	\$ 9,680
<b>Average Program Costs</b>	<b>\$ 28.45</b>	<b>\$ 38.39</b>	<b>\$ 57.14</b>	<b>\$ 52.29</b>	<b>\$ 51.46</b>	<b>\$ 52.90</b>

**AVERAGE COSTS PER RESIDENTIAL CUSTOMER**

	<b>2006</b>	<b>2007</b>	<b>2008 <sup>[3]</sup></b>	<b>2009</b>	<b>2010</b>	<b>2011</b>
<b>Primary Residential Customers <sup>[1]</sup></b>	40,567	40,444	40,972	41,087	41,414	41,589
<b>Outreach Costs <sup>[2]</sup></b>	\$ 3,015	\$ 6,718	\$ 8,000	\$ 8,000	\$ 8,800	\$ 9,680
<b>Average Program Costs</b>	<b>\$ 0.07</b>	<b>\$ 0.17</b>	<b>\$ 0.20</b>	<b>\$ 0.19</b>	<b>\$ 0.21</b>	<b>\$ 0.23</b>

<sup>[1]</sup> As of December 31 each year. Total customers for PY 2006-2007 reflect actuals. Total customers for PY 2008-2011 are proposed.

<sup>[2]</sup> Costs for PY 2006-2007 reflect actuals. Costs for PY 2008-2011 are proposed.

<sup>[3]</sup> The Outreach budget for 2008 includes \$45,780 of carry-over funds that were unspent prior to 2008.

# **APPENDIX C**

## **REVENUE REQUIREMENT AND RATE IMPACTS**

**TABLE C-1    EFFECTIVE AND ESTIMATED CARE AND LIEE SURCHARGES**

**Revenue Requirement and Rate Impacts**  
**Effective and Estimated CARE and LIEE Surcharges**  
**Sierra Pacific Power Company**  
**Table C-1**

	<b>2008 Effective</b>	<b>2009 Estimated</b>	<b>2010 Estimate</b>	<b>2011 Estimated</b>
CARE	\$0.00077	\$0.00104	\$0.00108	\$0.00113
LIEE	\$0.00020	\$0.00022	\$0.00024	\$0.00026

CERTIFICATE OF MAILING

I hereby certify that I am an employee of Sierra Pacific Power Company in Reno Nevada and on this 1<sup>st</sup> day of July, 2008, I served each party with a copy of **SIERRA PACIFIC POWER COMPANY'S APPLICATION FOR APPROVAL OF LOW-INCOME ASSISTANCE PROGRAMS AND BUDGETS FOR PROGRAM YEARS 2009 – 2011** via electronic email to the attached service list (R. 07-01-042) and by U.S. Mail postage prepaid to the following individuals whose email address was not provided:

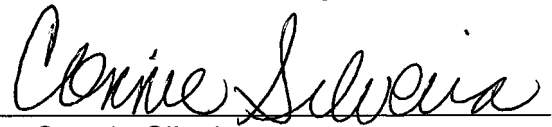
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DATED this 1<sup>ST</sup> day of July, 2008.

  
\_\_\_\_\_  
Connie Silveira

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Last Updated on 30-JUN-2008 by: AMT

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