

Attachment A

2

Customer and Structural Eligibility

2.1 Overview

This section discusses the eligibility of individual households for participation in the LIEE Program. Eligibility of a household for program participation and for specific types of measures depends on several factors, including:

- Household income;
- The utility services provided by the utility to the household;
- The specific type of structure in which the household resides;
- The ability to obtain the approval of the landlord in the event the household resides in rental property;
- Previous weatherization services provided for the property in question; and
- The household's need for energy efficiency measures.

These eligibility requirements are explained below.

2.2 Income Requirements

2.2.1. Income Guidelines

All the utilities use the LIEE income guidelines¹ established by the California Public Utilities Commission ("CPUC" or "Commission") to qualify participants in the LIEE Program. These guidelines are based on certain percentages of the Federal poverty levels for households of different sizes. There are two tiers to the income eligibility requirement. As established in D. 01-06-010,² the income guideline is 175% of the Federal poverty level if the applicant or the head of household is neither 60 years of age or older, nor disabled. The guideline is 200% of the Federal poverty level if the applicant or the head of household is

¹ Commission Resolution E-3254, dated January 21, 1992 ordered utilities to use the CARE income guidelines for the low income weatherization programs, but permits utilities to use 200% of Federal Poverty Guidelines for low income customers who are 60 years of age or older and for handicapped persons.

² See *Interim Opinion: Eligibility Criteria and Rate Discount Level for Low Assistance Programs*, D. 01-06-010, June 7, 2001.

either 60 years of age or older, or disabled. The Federal poverty level is changed annually, so the CPUC updates the LIEE income guidelines every year. Table 2-1 presents these guidelines for the period of June 1, 2005 through May 31, 2006.

Table 2-1: Income Guidelines (June 1, 2005 Through May 31, 2006)

Number of People Living in Household	If the applicant or head of household is neither 60 years of age or older nor disabled, total household income before taxes cannot exceed:	If the applicant or head of household is 60 years of age or older or disabled, total household income before taxes cannot exceed:
1	\$24,200	\$27,700
2	\$24,200	\$27,700
3	\$28,400	\$32,500
4	\$34,200	\$39,200
5	\$40,000	\$45,900
6	\$45,800	\$52,600
If greater than 6, add the following amount per person	\$5,800	\$6,700

2.2.2. Types of Income Included in Household Income

For the purposes of determining Program eligibility, all income is considered, including taxable and non-taxable income and including (but not limited to) child support, spousal support, disability or veteran’s benefits, rental income, Social Security, pensions and all social welfare program benefits before any deductions are made. Table 2-2 indicates the specific items included as income for the purpose of determining eligibility for the LIEE Program.

The following types of receipts are *not* considered household income for the purposes of determining eligibility:

- Loan proceeds;
- Assets (money in bank accounts, a house, a car or other property of possessions);
- Funds transferred from one applicant account to another; or
- Liquidation of assets (other than the portion representing capital gains).

Table 2-2: Items Included in Income

Wages, salaries and commissions	401K payments or withdrawals*
Alimony payments	Rental income and royalties
Child support payments	School grants, scholarships or other aid*
Disability benefits	Self-employment earnings
Foster care payments	Social security payments
Realized capital gains on assets	Housing subsidies
Interest and dividends on assets	Supplemental Security Income (SSI) payments and SSP payments
Food stamps	Temporary Assistance to Needy Families (TANF) payments
Gambling/lottery winnings	Unemployment Benefits payments
General relief	Veterans Administration Benefit payments
Monetary gifts (both one-time and recurring)	Workers Compensation payments
Insurance settlements or legal settlements*	Union strike fund benefits
Pension payments or withdrawals*	

* Other than loans.

2.2.3. Verification of Income

Income documentation must be reviewed, recorded, copied and stored by service providers prior to the installation of measures for all prospective participants.³ Qualification for other programs cannot be taken as adequate evidence of qualification for the LIEE Program, except in the event that the customer has been verified by the utility as eligible for the CARE Program over the past year. Self-certification is not permitted.

The utility will periodically audit income documentation stored by the contractor. In the event that documentation is not complete and correct for a participant, payment to the contractor for the weatherization of that unit may be disallowed.

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Auditing is the quality control process used to ensure that only eligible households receive program services and that CPUC authorized ratepayer funds are properly utilized. Contractors are responsible for auditing and approving all customer eligibility documentation prior to submitting to DAP. Contractor staff members assigned to audit and approve customer eligibility documentation are strongly encouraged to attend outreach training. DAP regularly audits customer eligibility documentation submitted by contractor. The number of documents audited may be adjusted according to contractor and/or outreach performance or to address specific quality issues. Audits may include extra multi-family units, units completed in a

³ This requirement is not applicable to the SCE relamping program.

particular geographic area, units that have used a particular type of income documentation, or units completed by a particular outreach specialist. In all cases, previous audit results, records of problems, corrective actions required, and other historical information may be considered in determining audit size. Audits may be conducted at DAP office and/or contractor's facility. If audit is conducted at contractor's facility, DAP audit staff will e-mail contractor and schedule an appointment to view customer eligibility and household documentation. Contractor will receive at least 48 hours notice to facilitate retrieval of all applicable documentation. DAP audit staff will also contact customers to review documentation and household information.

Audit Key Performance Indicator (KPI). Contractor must maintain an overall audit KPI of at least 95 percent. The audit KPI is based on audit results during the previous twelve months and is updated regularly.

Reporting. DAP audit staff will e-mail audit findings to contractor within five business days from date of audit. Contractor is responsible for notifying each outreach specialist of audit results and availability of training as applicable.

Appeal Process. Contractor may appeal audit findings within five business days from receipt of audit report by submitting (by fax or e-mail) a completed Audit Appeal Form. Contractor shall not contact customers during any phase of the appeal process to obtain proof of eligibility. Only DAP audit staff is authorized to discuss eligibility with customers during or after an audit. Should a contractor contact a customer in an attempt to prove eligibility, contractor shall immediately forfeit all appeal rights for six months and shall immediately reimburse So Cal Gas for any outstanding monies owed. Additionally, no documentation will be accepted after conclusion of audit. DAP audit staff will e-mail appeal results to contractor within five business days from receipt of audit appeal.

Activities such as forging signatures, using non-existent household members, using wage stubs not belonging to the customer, outreaching with non-certified helpers, outreaching without proper program identification, using another outreach specialist name or badge, signing an agreement as the outreach specialist who qualified the customer when someone else did the qualifying, attempting to obtain income documentation or signatures from a customer after DAP services have been performed, or any activity intended to circumvent the policies and procedures of the Direct Assistance Program may result in the immediate de-certification of the outreach specialist involved.

De-certification. De-certified outreach specialists are not permitted to work in the Direct Assistance Program in any capacity. The de-certification process is as follows:

- DAP office will notify contractor of de-certification of outreach specialist
- Contractor shall immediately notify outreach specialist of de-certification, obtain outreach specialist's DAP identification badge and return it to the DAP office within 48 hours of notification from DAP
- All outstanding agreements bearing the outreach specialist's name must be re-qualified at contractors' expense

Table 2-3 indicates the kinds of documentation required for various types of income. In applying these documentation requirements, the following stipulations must be observed:

- Current award letters must include the value of the award and the period of time in question. They must also be dated during the program year and within one year of the customer's signature date and must list the customer's name.
- Affidavits relating to gifts must indicate the amount and frequency of the gift(s). They must also contain the name, phone number, address and signature of the giver.
- In determining rental income, it must be understood that a renter-landlord relationship exists between household members when a room or rooms in the home is being rented. Unless the renter is a dependent of someone in the household, the renter's income is not included in household income and the renter is not counted as a household member. The rental payments do count as household income. In the event that the renter is a dependent of someone in the household, the renter's income is counted, the renter is considered as a household member, and the rental payment is not counted as part of household income. A dependent is anyone claimed on the applicant's income tax return.
- Federal income tax documentation must include copies of all 1099s and W-2 forms.
- Affidavits from an employer who pays the applicant cash wages must be on the employer's letterhead and include the company name, address and phone number. It must also include the name of the applicant, total amount paid to the applicant, and the frequency of payments, and must contain a signature from the employer's authorized representative.
- If the applicant receives cash wages for jobs like mowing lawns, babysitting, handyman services, casual day labor, etc., a self-employment affidavit from the applicant is acceptable if it meets all Program criteria.

Table 2-3: Income Documentation Requirements

Type of Income	Documentation
wages, salaries and commissions	copy of customer's payroll check stub(s) OR Federal income tax filing showing gross income OR affidavit from employer (for cash wages only, and only where just one employer)
alimony or child support payments	cancelled checks OR most recent court document stating amount
disability benefits, foster care payments, Unemployment Benefits, VA Benefits, Workers Compensation	copy of checks stubs OR copy of most recent award letter
capital gains	Federal Income Tax filing showing gross income, or 1099 form
food stamps	copy of most recent award letter OR food stamp/cash issuance letter (indicate TANF or General Relief)
gambling/lottery winnings	determined on case-by-case basis
general relief	copy of most recent award letter (Notice of Action) OR copy of uncashed check(s) OR copy of direct deposit statement(s)
monetary gifts	copy of customer's bank statement OR affidavit from gift giver
proceeds from insurance settlements or legal settlements	copy of settlement document
interest and dividend income	copy of customer's bank statement(s) OR copy of customer's investment statement(s) OR Federal Income Tax filing showing gross income
pension or 401K payments or withdrawals	copy of customer's check stubs OR copy of most recent award letter OR Form 1099R from prior year
rental income	tax return (Form 1040 and Schedule C, line 29) showing rental income OR copy of rental receipts OR copy of rental agreement specifying rent amount and affidavit from tenant
school grants, scholarships or other aid	copy of award letter OR copies of cancelled checks
self-employment earnings	income statement showing most recent quarterly adjusted earnings plus prior year's tax return (Form 1040 and Schedule C, line 29) OR written affidavit from an accountant or applicant
housing subsidies	award letter
Social Security payments	copy of most recent award letter OR customer's bank statement showing Social Security deposit
(SSI) payments and (TANF) payments	copy of most recent award letter (Notice of Action) OR copy of uncashed check(s) OR copy of customer's direct deposit statement
Union strike fund benefits	copy of benefits payment stub

- An applicant's affidavit relating to cash wages received from an employer must include the employer's company name, address and phone number, the name of the applicant, total amount paid to the applicant, and the frequency of payments, and must contain a signature from the employer's authorized representative.
- In cases where a household claims no income for the past 12 months, the applicant must demonstrate his or her means of financial support other than income. In the event that the applicant cannot provide documentation of either income or other means of support, weatherization services will not be performed until such information is provided.

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In addition to the income documentation requirements in Table 2-3, the following documentation will also be accepted:

- Alimony or child support payments- Affidavit from recipient
- Disability benefits, foster care payments, unemployment benefits, VA benefits, or workers compensation- Bank statement showing direct deposit.
- Food stamps- Notice of Action
- Pension or 401k payments or withdrawals- Bank statement showing direct deposit
- Social Security payments- Copy of un-cashed check

Self-employment affidavits must be hand written (**pre-printed forms are not allowed**) by the person receiving the income and must include the following:

- Name of self-employed household member
- Contact telephone number
- Date affidavit was written
- Type of business
- Amount of income
- Frequency of income
- Signature of self-employed household member

Affidavits documenting cash wages from one employer cannot be used if the employee receives a paycheck stub.

2.2.4. Household Income Calculation Procedures

Household income guidelines are based on gross (*pre-tax*) annual income.⁴ In the event that a full 12 months of income information is not available, or if there has been a change in the employment status of the household over the past 12 months, it may be necessary to

⁴ For self-employed individuals, gross (*pre-tax*) income is defined to be net of deductions for the costs of earning income.

3

Customer Outreach and Customer Relations

3.1 Introduction

This section presents statewide LIEE policies and procedures in the areas of customer outreach and customer relations. Subsection 3.2 discusses policies relating to the recruitment of participants for the Program, while Subsection 3.3 focuses on the maintenance of proper relationships with customers. It should be understood that the policies in this section are supplemented by additional provisions in both specific and general terms and conditions included in formal agreements between utilities and contractors.

3.2 Customer Outreach

Contractors recruiting customers for participation in the LIEE Program are required to follow strict policies relating to customer outreach. Customer outreach policies cover promotional guidelines, limitations on representations made by contractors and their employees, outreach interactions, and tracking.

3.2.1. Promotional Guidelines

Only promotional materials approved by the Utility Program Manager may be used to promote participation in the LIEE Program.

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- Placing flyers or other promotional material in or on mailboxes is strictly prohibited.
- Contractor shall use DAP issued identification badge to identify himself or herself to the customer.
- Contractor should introduce himself or herself to the customer as an employee of "XYZ Agency/Company" and provide them with information pertaining to the Direct Assistance Program, jointly sponsored by Southern California Gas Company (The Gas Company®) and Southern California Edison.
- Use of The Gas Company identity on contractor apparel or business cards is strictly prohibited in order to prevent potential misrepresentation or the perception of implied endorsement.

3.2.2. Representations by Contractor and Contractor's Employees

Neither the contractor nor his/her employees may imply that they are employees of the Utility or affiliated with the Utility in any way other than through the LIEE Program.

3.2.3. Outreach Interaction

Outreach personnel must effectively contact and interact with a diverse set of customers. These personnel shall have available any necessary multilingual staff and/or translators.

3.3 Customer Relations

3.3.1. Introduction

It is imperative that both contractors and utility employees maintain proper customer relationships. The LIEE Program is a customer service program, and should be delivered accordingly. Specific policies with respect to customer relations are specified below.

3.3.2. Expedient Service

Service must be provided to participants in a reasonable time frame, as determined by the utility. Crews must inform customers of the approximate amount of time required for installations, inspections and gas appliance testing (if required), and shall provide services as expeditiously as possible.

3.3.3. Other Work

Only three types of work for participating customers may be billed to the LIEE Program: energy education, the installation of eligible measures, and the provision of eligible minor home repairs. The contractor is prohibited from selling other services to the customer or charging the customer for any other service.¹

3.3.4. Staff Identification

All contractor or subcontractor employees who engage in customer contact must wear identification badges provided or approved by the utility at all times. Each badge must include a color photo of the employee. If the contractor produces badges, templates for identification badges will be provided by the utility. The contractor shall immediately return or destroy the ID badges of all personnel no longer working for the contractor or its subcontractors on the LIEE Program. In the event that the contractor destroys the badges, the contractor shall notify the Program Administrator in a timely fashion.

¹ Note that this provision does not preclude the possibility of requiring a co-payment for the installation of one or more measures, if approved by the utility.

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All contractor and/or sub-contractor personnel who engage in customer contact activities for DAP shall present their valid DAP photo identification badge to the customer upon arrival. Additionally, the DAP identification badge must be displayed at all times by attaching it to outer clothing at or above the waistline so that it is plainly visible.

3.3.5. Crew Appearance

LIEE contractors are responsible for the courtesy and appearance of their employees. Discourteous personnel and unprofessional appearance will not be tolerated in this program and may constitute grounds for contract termination.

3.3.6. Clients 18 Years or Older

In general, contractors shall enter clients' residences only when adults, eighteen (18) years of age or older are present. The only exception to this rule is that contractors may enter the home of a customer under eighteen (18) years of age if the customer is married or has been declared an emancipated minor by the courts.

3.3.7. Customer Complaint Procedures

The contractor must make every effort to resolve customer complaints. The Contractor must notify the utility or its designee of the status of each complaint within 24 hours of the contractor's receipt of the complaint. If the complaint deals with customer safety, the contractor must resolve it within 24 hours. If the complaint does not relate to customer safety, the contractor must resolve the complaint to the satisfaction of the customer within 10 days of the receipt of the complaint. The acceptability of the contractor's resolution of complaints will be determined at the sole discretion of the utility. If the contractor has not resolved the complaint within the mandated period, the contractor shall notify the utility or its designee of this failure.

3.3.8. Substance Abuse and Smoking Policy

While at the customer sites, contractor personnel shall not be under the influence of drugs or alcohol nor be using drugs or alcohol when on the job. Smoking is prohibited within the residence being served at all times and on the customer's property without the customer's approval.

3.3.9. Incident Report

Contractors must immediately contact the utility or its designee if during a home visit there is damage to a customer's home and/or property or if the contractor's employee has been accused of an illegal act. Within 24 hours, the contractor will inform the utility or its designee of the resolutions of all such incidents.