

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Policies,
Procedures and Rules for the Low Income Energy
Efficiency Programs of California's Energy Utilities.

Rulemaking 07-01-042
(Filed May 24, 2007)

Southern California Edison Company's
(U 338-E) Application for Approval of SCE's
"Change A Light, Change The World," Compact
Fluorescent Lamp Program

Application 07-05-010
(Filed May 24, 2007)

**COMMENTS OF THE GREENLINING INSTITUTE ON APPLICATION OF
SOUTHERN CALIFORNIA EDISON COMPANY**

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May 24, 2007

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INTRODUCTION

Greenlining applauds SoCal Edison for proposing its big, bold strategy called "Change of Light, Change the World." It is Greenlining's intention to fully cooperate with Edison, the CPUC, and other utilities wishing to engage in big, bold strategies that are voluntarily developed before they are mandated. Within ten years, and possibly within five, Edison's proposal, which could be implemented by 2008, is likely to be mandated throughout the nation.

Greenlining has a number of questions however, before it signs off.

First, "Change the world" groups must be recruited that are well respected for their general work in the community, not just for their narrow expertise. Greenlining is unclear as to whether the amount allocated by Edison per household is sufficient or that virtually all of the funding to

community based organizations should be based on households that receive the CFLs as opposed to also partially reimbursing groups for specific educational efforts that maximize the receptivity of the targeted community to receive CFL and other PUC related energy efficient programs.

Greenlining wants to be assured that the non-traditional community based organizations that have deep roots within the community, including faith-based institutions, are aggressively and effectively recruited and properly compensated. These efforts should not be, as many past efforts have been, largely bureaucratic with limited resonance and impact beyond the specific program.

Second, Greenlining is unclear that the most cost efficient strategy, is to have just one utility, launch this program. It is quite possible that it would be far more cost efficient, particularly as to the broad educational message that could be delivered by the media, to have Sempra and PG&E sign on, and perhaps the municipal districts such as L.A. and Sacramento, before approving this program. At a minimum this will reduce the cost of the educational message and clearly maximize the effectiveness of the educational message. And since many of the most effective faith-based organizations jointly serve Sempra, Edison, and municipal districts, they too could be more efficient.

Third, Greenlining feels that it is necessary for Edison and any other participating utilities to address the cost of manufacturing CFL bulbs, the safety and potential hazards in disposal of these bulbs and how any negative effects can be offset. Without a proper adherence to a set of standards in administering this program, what is intended as an empowering and positive step in energy efficiency and cost savings, could become detrimental and harmful to low income communities.

Fourth, the most effective energy efficiency strategies by corporate America come when the CEO is involved. The Edison holding company CEO John Bryson is the most knowledgeable utility CEO in the country on energy efficiency and environmental issues and should play a prominent and personal role in the unveiling of this program and in developing strong support for this type of program from his counterparts at Sempra, PG&E, and municipal districts.

Section I: Partnerships with Community Based Organizations

Community based organizations in low income communities, particularly faith based organizations, can provide a much needed inroad for programs such as the “Change A Light, Change The World” program. The potential that exists for this program will only be fully realized if:

- 1) a broad and diverse group of groups are recruited for administering the program and
- 2) those groups are fully funded for their efforts in disseminating the CFLs and their efforts in education and outreach.

In order for the cost and energy savings projected through this program to be felt by eligible families, Edison must ensure that the most wide reaching group of community based organizations are rallied together behind this “Change a Light, Change The World” mission. In

essence, it is critical to go beyond the “normal” players and seek out partnerships with faith based organizations¹, educational and youth development organizations and ethnic media outlets.

Greenlining is most concerned that the \$22 million projected as the budget for this program will not meet the purchasing, education and outreach needs of an effective administration of the program. In order for low income households to reap the full benefits of using CFLs, they must not only be able to purchase the CFLs but must also be educated and made aware of the long term benefits, how the use of the lamps translate into comprehensive dollar and energy savings and where CFLs fit in the larger methods of making their home energy efficient.

During the public hearing Greenlining is urging, we expect Edison to address whether its projected budget is intended for individual households and if so how they plan on engaging community groups outside of the conventional cadre particularly faith based organizations. Additionally, Greenlining would like Edison to bring forth a strategy for utilizing ethnic media outlets. While the traditional outreach and marketing has been done through outlets such as the *Los Angeles Times* and other mainstream sources, Greenlining feels that the lack of minority readership of print sources such as these will limit the exposure of this program. It will be imperative that Edison form partnerships with ethnic print and web based media sources to promote this program in order for it to reach all qualifying families.

¹ For example, consider the efficiency and the potential power of West Angeles Church of God in Christ (with 27,000 family members, 95% of whom are minorities, and generally low to moderate income,) to effectively educate the community not only on this program but other CPUC authorized efficiency programs that are part of the CPUC’s efforts to ensure that by 2015 all low-income Californians are fully energy efficient.

Section II: Partnerships with Other Utilities (Investor Owned and Municipal)

Currently, Sacramento Municipal Utility District (SMUD)² is the only other major municipal utility engaging in the “Change A Light, Change The World” program. Neither East Bay Municipal Utility District (EBMUD) or the Los Angeles Department of Water and Power (LADWP) have this program in place.

In order for this “big, bold strategy” to live up to its name and objective (bringing about energy efficiency in ever low income home by 2015) all relevant and potentially effective partners must be at the administrative table. Greenlining is certain that with Edison’s leadership, the other investor owned utilities as well as municipal utilities can work together to expand the scope of this program and the number of households it can reach.

LADWP is the largest municipal utility in the country and serves over 3.8 million in the city of Los Angeles, SMUD is one of the ten largest in the country and provides utility services to the 1.2 million citizens of Sacramento County. While EBMUD has a stronger foothold in water and wastewater services, their territory encompasses approximately 1.3 million individuals in a 325 square mile area.

The potential for a more expansive customer base for this program is apparent in a partnership that involves not only the other major investor owned utilities but these three major municipal utility districts. While Edison’s service territory area in Southern California is substantial, the

² Please see ‘<http://www.smud.org/residential/saving/cfl.html>’ for more information on SMUD’s “Change A Light, Change The World” program.

chunks of the region that are not within that territory are being served by potential partners (i.e.—LADWP, San Diego Gas & Electric, etc.) that will expand the benefits of this program while sharing in the resource allocation and administration of the program concurrently.

Section III: Edison Leadership

As Greenlining mentions in Section II, we believe that Edison is a leader that must bring other parties and vested entities to the table in order for this program to be successful and actually “change the world.” In addition to its leadership in forming partnerships that meet the needs of the entire low income population of the state and lessens the energy burden on scarce resources, Greenlining is also looking for Edison to establish further standards on the safety and disposal issues relating to CFLs.

While the energy and cost savings of changing from incandescent bulbs to CFLs seems very simple, many dispute whether these savings outweigh manufacturing and other environmental costs. In public hearings, Greenlining encourages Edison to address how it will ensure that unintended negative consequences do not result from the positive intentions of this program.

Nationally, other consumer advocacy groups have raised concerns over whether or not manufacturing companies are providing sufficient information and means of safe disposal of

CFLs.³ Accidental breakage of disposed CFLs can bring about overexposure to mercury (in large amasses if the number of CFLs present throughout the state is increased through this program). It behooves Edison and any other organizations associated with this program to use their leadership to press manufacturers to provide the necessary information to consumers and the most healthy and safe means of proper disposal.

Greenlining believes that Edison, under the direction of CEO John Bryson, can ensure that manufacturers and distributors (direct and indirect) can not only be held accountable but also pro-actively educate communities on these issues in order for optimum benefits to be received without further detriments to the physical environments of low income communities. In addition, CEO Bryson will be the critical component in bringing the other investor owned and municipal utilities on board into this program.

For these reasons, Greenlining urges a presence from CEO Bryson at the public hearings to address his leadership strategy for ensuring that:

- 1) Edison promotes the highest level of consumer awareness and education, that health and safety standards are reinforced,
- 2) faith based organizations and ethnic media outlets are engaged and utilized,
- 3) other utilities are also involved in the implementation of this program, and
- 4) this program is fully funded for purchasing, outreach and marketing and education that is holistic in addressing overall energy efficiency and environmental sustainability.

³ Please see, http://news.yahoo.com/s/usnw/20070521/pl_usnw/free_enterprise_action_fund_ticker_feaox_calls_for_warning_labels_on_mercury_containing_compact_fluorescent_light_bulbs on recent steps to ensure corporate accountability for the health and environmental impact of CFL disposal.

Request for Public Hearings

In order to ensure maximum public participation and minimize costs and ensure full community input, Greenlining urges that public hearings be held, including public hearings in the PG&E, Sempra, and Los Angeles municipal district.

In the interim, Greenlining has already discussed this issue with a large number of faith-based leaders and community leaders, including meetings in mid-May with 20 pastors at Grant AME Church and will be meeting with three dozen community leaders on June 13th and June 19th in Sempra territory, primarily in preparation for a luncheon meeting on June 19th with the lead commissioner on energy efficiency for low-income families, Commissioner Dian Grueneich.

Dated: May 24, 2007

Respectfully submitted,

/s/ _____

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of:

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on all known parties to the above-captioned proceedings by mailing a properly addressed copy by first-class mail with postage prepaid, transmitting a facsimile copy, and/or transmitting an electronic copy to each party named in the official service list as maintained on the California Public Utilities Commission's web page.

Executed on May 24, 2007 at Berkeley, California.

/s/

Mark Rutledge

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