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

Application of San Diego Gas & Electric Company (U 902 M) for Approval of Low-Income Assistance Programs for Program Years 2007 and 2008.	Application 06-06-032 (Filed June 30, 2006)
Application of Southern California Gas Company (U 904 G) for Approval of Low-Income Assistance Programs and Budgets for Program Years 2007 and 2008.	Application 06-06-033 (Filed June 30, 2006)
Application of Pacific Gas and Electric Company (U 39 M) for Approval of the 2007 and 2008 California Alternative Rates for Energy and Low Income Energy Efficiency Programs and Budget.	Application 06-06-034 (Filed June 30, 2006)
Southern California Edison Company's (U 388-E) Application for Approval of Low-Income Assistance Programs and Budgets for Program Years 2007 and 2008)	Application 06-07-001 (Filed July 3, 2006)

**COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY ON ALJ MALCOLM'S
PROPOSED DECISION ADOPTING UTILITY BUDGETS FOR 2007-2008 LOW
INCOME ENERGY EFFICIENCY PROGRAMS AND CALIFORNIA ALTERNATE
RATE FOR ENERGY**

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Dated: December 4, 2006

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OF THE STATE OF CALIFORNIA**

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I. INTRODUCTION

In accordance with Rule 77.2 *et seq.* of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission" or "CPUC"), Pacific Gas and Electric Company ("PG&E") hereby submits these Comments on the Draft *Order Adopting Utility Budgets for Low Income Energy Efficiency Programs and California Alternate Rate for Energy* ("Proposed Decision" or "PD"). PG&E supports and appreciates the PD's approval of the majority of PG&E's requested 2007 and 2008 Low Income Energy Efficiency ("LIEE") and California Alternate Rate for Energy ("CARE") budgets and program design proposals. By these Comments, PG&E seeks to correct and clarify a number of facts related to its proposed LIEE and

CARE programs and related budget proposals. In addition, PG&E seeks to clarify the fact that its current LIEE program administration contract with Richard J. Heath and Associates (“RHA”) expires at the end of 2007 and is the result of a competitive bid process. As described in the PD, PG&E plans to issue another Request for Proposals to competitively select its LIEE program administrator for 2008 and beyond.

II. DISCUSSION

A. PG&E’s Comprehensive LIEE In-Home Energy Education Activity is Customized to Help Each Customer Reduce Overall Energy Usage and the Commission-Adopted Statewide Policies and Procedures Manual Requires Comprehensive In-Home Education That Goes Well Beyond Distribution of Pre-Printed Materials

The budget PG&E proposed for “in-house” education reflects the cost of comprehensive, customized in-home education for each LIEE customer, including full compliance with the in-home energy education requirements in the Commission-adopted 2006 Low Income Energy Efficiency Program Statewide Policy and Procedures Manual (“P&P Manual”). The P&P Manual describes procedures for pre-installation contacts, including a description of program services, data collections, in-home energy education, in-home energy assessment, installation of compact fluorescent light bulbs and other responsibilities. Specifically, Section 4.4 of the P&P Manual specifies that topics to be covered in the course of the energy education must include: the general levels of usage associated with specific end uses and appliances; the impacts on usage of individual energy efficiency measures offered through the LIEE Program or other programs offered to low-income customers by the utility; practices that diminish the savings from individual energy efficiency measures, as well as the potential cost of such practices; specific ways of decreasing usage through changes in practices; information on CARE, the Medical Baseline Program, and other available programs; appliance safety information; how to read a utility bill; and the procedures used to conduct natural gas appliance testing (if applicable).

PG&E complies with the requirements of the P&P Manual by providing comprehensive, customized energy education in the home (as distinguished from group energy education) of each of its LIEE customers. Specifically, PG&E-trained contractors known as “Energy

Specialists” (ES) find, qualify and provide in-home energy education to low-income gas and electric customers. The energy education is usually conducted in conjunction with an assessment of the home for LIEE program energy saving measures for which the customer qualifies. As the ES and the customer walk through the home, the ES describes the specific energy saving measures that may be installed through the program. Each energy-consuming device in the home is addressed as the ES offers energy conservation and money saving tips for each appliance’s most efficient operation. In-home education is usually done in the preferred language of the customer, with related pre-printed educational materials also provided in that language.

During the customized, in-home, energy education each LIEE customer receives an energy cost calculator (or “energy wheel”). Using the energy cost calculator, the ES shows customers how to determine their current energy expenditures by measure or type of appliance. As a result, the ES is able to help the customer find ways to reduce overall energy usage. The customers are asked to adopt at least three energy saving practices which would result in overall reduced energy usage and increased comfort. In addition, the ES reviews the customer’s PG&E bill and explains how to read and understand it. The ES assists the customer with a California Alternate Rates for Energy (CARE) application and/or Home Energy Assistance Program (HEAP) contact information, if applicable.

PG&E believes that the comprehensive, customized, in-home education provided by its ES contractors is a valuable service to its LIEE customers. Clearly, contractors would not accept \$8 per home as proposed in the PD to perform the amount of in-home education and assessment that PG&E currently requires its LIEE customers receive. In fact, PG&E would anticipate that its current contractors could not ensure compliance with the P&P Manual in-home education requirements for \$8 per home.

An additional factor that distinguishes the total costs for PG&E’s in-home education is the geography of PG&E’s service area. PG&E’s service area encompasses the largest and most diverse geographic area of all the IOU’s in California, covering over 74,000 square miles with 11

California Energy Commission climate zones, including several mountain ranges, the Great Central Valley farmland, and the temperate Pacific coast. PG&E's service area includes both urban and rural lands. Approximately 25% of the LIEE work completed so far in 2006 was performed in areas that are classified as rural. Many of these rural areas are served by small community based organizations ("CBOs"). The small local CBOs that serve these rural areas have higher than average overhead costs associated with serving their clients. Specifically, traveling time and mileage incurred for home visits in rural areas are high, as some customers live miles away from one another along rural routes. Contractors are not able to perform as many visits per day as their urban counterparts. To ensure LIEE service to these customers, PG&E must provide additional compensation to contractors per customer served to account for the extra distance and inconvenience associated with traveling to a distant location for a very limited number of customers.

For these reasons, PG&E requests that the PD be modified to approve PG&E's requested in-home energy education budget. Alternatively, if the PD is not modified to increase PG&E's in-home education budget, there should be explicit language superseding the P&P Manual in-home education requirements, and stating that distribution of pre-printed materials and application instructions is the new policy for in-home education. However, given the valuable information provided to its LIEE customers, PG&E would urge the Commission to fund its customized in-home education as requested in its Application.

B. The PD Should Explicitly Allow PG&E to Utilize the Advice Letter Process to Establish a Cool Center Program and to Recover Funding Necessary to Implement the Proposed Cool Center Program

PG&E is happy to work with local governments to establish cool centers to help ensure the comfort and safety of its customers during periods of extreme heat. To ensure timely implementation of a cool center program, PG&E requests that the PD explicitly provide that the advice letter process can be utilized to approve PG&E's proposed cool center program and funding necessary for such a program. The PD provides that "PG&E shall no later than February 15, 2007 submit to Energy Division a plan for working with local governments to establish cool

centers and shall open some cool centers by summer 2007.” OP 12. The PD does not, however, include funding for the contemplated program or provide direction on acquiring future funding of PG&E’s cool center program proposal. PG&E requests that the PD be modified to provide that PG&E file an Advice Letter seeking approval of a cool center program, and also seeking approval of a budget for implementing the proposed cool center program. PG&E would not be able to operate a cool center program without the funding necessary to establish the cool center program. In the past, the cool center programs offered by the other utilities --Southern California Edison (SCE) and San Diego Gas & Electric (SDG&E) – have been funded in the low income proceeding. Accordingly, PG&E requests that the PD be modified to include explicit language stating that PG&E should submit its cool center program proposal and corresponding budget request for Energy Division approval via the advice letter process.

C. The PD Should Be Modified to Expressly Approve PG&E’s Proposed LIEE Pilots and Measure Modifications

The PD should include an Ordering Paragraph that explicitly approves implementation of PG&E’s proposed LIEE pilots and modifications to current measures consistent with language in the text of the PD. For 2007-2008, PG&E’s proposed modifications to measures include removing the cap on the number of compact fluorescent light bulbs and exterior hardwired fixtures that may be installed per home. PG&E’s proposed new measures include an air conditioning tune-up pilot, a ceiling fan pilot, and installation of interior hardwired fixtures. The text of the PD seems to approve these proposed measure modifications and pilots but there is no explicit approval in a corresponding Ordering Paragraph. Specifically, the PD states that “DRA and QCS *support lifting the cap on the number of CFLs that may be installed in a residence and the pilots PG&E proposes for new measures. We agree that this proposal is reasonable and may increase energy savings.*” (Emphasis added) PD at p.30. Consistent with the above-quoted language, the PD should be modified to include an explicit statement approving PG&E’s proposed LIEE pilots and measure modifications.

D. The PD Should be Modified to Approve Funding for the Proposed Statewide Process Evaluation of the 2007 LIEE Program

Given the Commission's focus on evaluating LIEE programs from a resource perspective, PG&E believes the proposed statewide process evaluation of the 2007 LIEE program would be a prudent way to determine best practices for future program cycles.

In the PD, the Commission expresses its intention to reexamine low income programs and services throughout 2007 with active participation by Commission staff, the LIOB and other interested members of the public. An evaluation of program processes by an independent evaluator, as contemplated for the proposed process study, would provide a basis for defining and comparing best practices so that the utilities can build upon program successes and make changes as necessary to improve the cost-effectiveness and overall quality of the LIEE program.

The proposed statewide process evaluation would be developed and coordinated by a collaborative team including the Energy Division, DRA, and the utilities. The LIOB and other interested parties could also participate in the study. PG&E requests that the PD be modified to authorize funding for the proposed statewide process evaluation study. Alternatively, as a potential way to reduce the costs associated with a stand alone study, the PD could authorize a portion of the requested process study funding and add "process evaluation" as a component of the 2007 Impact Evaluation study.

E. The PD Should Be Modified to Reflect the Fact that PG&E's LIEE Administration Contractor Has a Contract Through 2007 and Was Selected Via a Competitive Bid Process

PG&E's current LIEE administrator, Richard J. Heath and Associates ("RHA"), was awarded a three-year contract, through the end of 2007, as the result of a competitive bid process. The statement in the PD that PG&E proposes to maintain RHA as its administrator "in 2007 without requiring it to compete for a contract" is erroneous. See PD at p.32. To the contrary, PG&E did not direct award the administration contract to RHA, nor does PG&E seek permission to renew RHA's contract without a competitive bid process. PG&E's current three-year contract with RHA expires at the end of 2007, and PG&E plans to issue a new Request for Proposals soliciting competitive bids for LIEE contract administration for 2008-2010. Further,

PG&E will require that the successful LIEE prime contractor competitively bid out the subcontract work.

The PD should be modified to reflect the fact that RHA's existing administration contract does not expire until the end of 2007. The PD, as written, would require PG&E to unlawfully breach its existing contract with RHA because it states that the contract cannot extend beyond June 1, 2007 which predates the expiration of the contract. PG&E is happy to work with Energy Division to develop a competitive bid process for LIEE administration. However, the timeline for developing the competitive bid process should reflect the fact that the new administration contract will not commence until 2008 after the expiration of RHA's existing contract.

F. The PD Should Be Corrected To Reflect the Fact That PG&E's Proposed CARE Processing, Certification and Verification Budget Encompasses PG&E's Costs of Processing All CARE Applications Received Annually and Does Not Reflect Any Costs Specific to PG&E's Proposal To Accept On-Line Applications

As a preliminary matter, PG&E's proposed CARE budget for "Processing, Certification and Verification" is \$1.6 million (See Application 06-06-034, Attachment 5) The PD incorrectly states that PG&E's estimated budget for this category is \$1.9 million. (See PD at p.48).

Accordingly, PG&E requests that the PD be modified to reflect the correct proposed budget amount of \$1.6 million for processing, certification and verification of CARE applications.

PG&E's proposed budget of \$1.6 million for CARE "Processing, Certification and Verification" includes only the costs of PG&E's internal administrative staff time to certify, recertify and post-verify all of the approximately 700,000 CARE applications that PG&E receives annually. More specifically, the costs reflected in this CARE line item are the salaries of approximately 30 full time PG&E staff members dedicated to processing CARE applications. The PD significantly reduces PG&E's proposed \$1.6 million budget (from \$1.6 million to \$900,000) for annual CARE processing, certification and verification based on the erroneous assumption that costs for implementation of an on-line application process are embedded in this CARE budget line item. Specifically, the PD states that "PG&E's application provides almost no information about the costs or benefits of on-line enrollment, *although we presume its*

implementation would cost some substantial portion of the \$1.9 million [sic] it seeks for processing applications...we decline to authorize any funds for on-line applications...[and] [w]e reduce PG&E's budget for processing and information systems to \$900,000 annually." (emphasis added) (See PD at p.49). PG&E apologizes for the lack of clarity regarding the specific costs included in each of the CARE budget line items. The estimated costs for on-line applications are included in the "Bill System and Programming" category (See discussion *infra*, Section II.F.). However, given that the stated intent of reducing the "Processing, Certification and Verification" budget line item is the denial of costs associated with implementation of an on-line application process, the PD should be modified to approve PG&E's proposed \$1.6 million CARE application processing budget which includes no costs unique to PG&E's on-line application proposal. Without the proposed "Processing, Certification and Verification" budget, PG&E would not be able to maintain the administrative CARE staff necessary to process, certify, recertify, and verify the voluminous amount of CARE applications received annually.

G. On-Line CARE Applications as Proposed by PG&E Would Provide Customers with an Additional CARE Enrollment Option and the Reasonable Costs Associated with Implementing an On-Line Application Process are Included in the CARE "Bill System and Programming" Category.

PG&E requests that the PD be modified to approve on-line CARE enrollment because it cost-effectively provides customers with an additional CARE enrollment mechanism. Based on PG&E data, there are a large number of customers visiting PG&E's CARE Web site who could potentially benefit by having the convenient option of on-line CARE enrollment. For 2006, PG&E has compiled the following statistics related to the number of customers who visited PG&E's CARE Web site and downloaded applications:

- 113,000 customers visited pge.com\care
- 71,000 customers downloaded a CARE application
- 10,290 customers mailed in a downloaded application
- 9,500 customers who mailed in downloaded applications were certified

Based on these statistics for 2006, only 14% of customers who downloaded applications mailed them in to PG&E. The remaining 86% of customers did not mail the application in to PG&E. PG&E believes it is likely that some portion of those customers may have submitted

applications if they had been able to do so electronically on-line. Moreover, almost 100% of the customers who mailed in downloaded applications were eligible for CARE. Given this rate of eligibility for downloaded applications, PG&E would like to increase the number of customers actually submitting applications after accessing them on-line. For these reasons, PG&E believes the incremental cost of accepting on-line applications is justified by the potential for additional CARE enrollment. Accordingly, PG&E requests that the PD be modified to approve PG&E's proposal to implement a CARE on-line application process.

PG&E's estimated costs related to implementation of an on-line application process are included in the proposed budget category for "Bill System and Programming." Specifically, PG&E estimated a cost of \$125,000 for implementing an on-line application process. These costs were included as part of the \$150,000 budget category for Bill System and Programming to cover the cost of Web site infrastructure changes. The balance of \$25,000 in this budget category reflects costs associated with standard Information Technology system maintenance. PG&E believes the costs associated with on-line applications are reasonable, and requests that the PD be modified to approve implementation of on-line CARE enrollment and the corresponding budget associated with implementation of on-line applications.

H. The PD Should be Modified to Include an Ordering Paragraph Approving the Extension of the CARE Certification Period for Fixed Income Residential Customers to Four Years

The PD should include an Ordering Paragraph adopting PG&E's proposal to extend the CARE recertification period for fixed income customers, including customers receiving SSDI, from one or two years to four years for residential (including submetered). Based on language in the text of the PD, it appears that the intent was to approve PG&E's proposal to extend the CARE recertification period for fixed income customers, and to include SSDI within the definition of "fixed income." Specifically, the PD states that "we will adopt ...herein" Disability Rights Advocates' proposal that SSDI be considered fixed income for purposes of the extended CARE recertification process proposed by the utilities. PD at p.14. Consistent with this statement, PG&E requests that the PD be modified to explicitly adopt the utilities' proposal to

extend the CARE recertification period for fixed income customers, including customers receiving SSDI income.

I. The PD Should Be Modified to Approve Measurement and Evaluation Funding for the Estimated Cost-Sharing Amount That PG&E Will be Responsible to Pay for the Completion of the KEMA Needs Assessment

The PD should be modified to approve CARE Measurement and Evaluation (“M&E”) funding of \$125,000 which is PG&E’s estimate of its proportionate cost of the outstanding KEMA Needs Assessment invoice. By Commission Resolution E-3646, issued March 16, 2000, the Commission ordered that the Joint Utilities split the costs of the needs assessment study in the following manner: PG&E - 30%; SCE – 30%; SDG&E - 15%; and SoCalGas - 25%. The Joint Utilities have not yet received the final outstanding invoice for KEMA’s preparation of Phase II of the Needs Assessment. However, at some time in the future, PG&E will be expected to pay its proportionate share of the remaining costs of the Needs Assessment. For this reason, PG&E included an estimated amount of \$125,000 as part of its CARE M&E budget to ensure the availability of funding if the KEMA invoice is received within the 2007-2008 budget cycle. Alternatively, if the Commission does not approve placeholder funding for the Needs Assessment costs here, PG&E will submit an Advice Letter requesting recovery of its proportionate share of the Needs Assessment bill after the actual invoice has been submitted to PG&E for payment.

J. The PD Should Be Modified to Permit Fund-Shifting Flexibility Among the CARE Administrative Activities and LIEE Program Categories

The PD should be modified to explicitly provide that the utilities have the flexibility to shift funds between CARE administrative categories and to shift funds between LIEE program categories. In PG&E’s Application, the CARE and LIEE budgets submitted for the specific line item categories are estimates based on PG&E’s experience and knowledge of the market. However, as market conditions change during the year, it is typically necessary to reallocate funds between activities to maximize overall CARE and LIEE program productivity. Historically, the Commission has acknowledged the need for fund-shifting flexibility within the CARE and LIEE programs. For example, in D.05-12-026 approving 2006-07 Low Income

Programs, the Commission stated expressly that the “utilities may shift funds, as needed, among the CARE administrative activities and Low Income Energy Efficiency program categories.” See D.05-12-026, OP 10. Consistent with the historical fund-shifting flexibility, the PD should be modified to expressly authorize the utilities to shift funds among the CARE and LIEE activities.

PG&E further requests that the PD be modified to expressly authorize the carrying forward of unused 2006 and 2007 LIEE funds. Presently, PG&E anticipates that there may be unused funds from the 2006 LIEE budget remaining at the end of 2006. For this reason, PG&E requests that the PD expressly authorize the utilities to carry forward into 2007 unused 2006 LIEE funds, and also to carry forward into 2008 unused 2007 LIEE funds. This flexibility will allow the utilities to ensure that authorized LIEE funds are used to maximize the number of LIEE homes treated in 2007 and 2008 consistent with the Commission’s direction.

III. CONCLUSION

For the reasons set forth above, Pacific Gas and Electric Company respectfully requests that the Proposed Decision authorizing PG&E’s 2007 and 2008 CARE and LIEE programs and budgets be modified consistent with these Comments. Specifically, PG&E requests that PG&E’s LIEE Budget Table (Table 3 of the PD) be modified to authorize \$6,062,112 for in-home energy education for 2007 and 2008; and \$289,500 in 2007 for M&E which includes funding for the 2007 LIEE process study as discussed above. PG&E also requests that its CARE Budget Table (Table 4 of the PD) be modified to authorize \$1.6 million for Processing, Certification & Verification in 2007 and 2008, and \$125,000 in either 2007 or 2008 for PG&E’s estimated share of the cost of the Needs Assessment. PG&E’s proposed modifications to the Proposed

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Decision's Findings of Fact, Conclusions of Law and Ordering Paragraphs are attached as Attachment A.

Respectfully Submitted,

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CHONDA J. NWAMU

By: _____ /s/
CHONDA J. NWAMU

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Dated: December 4, 2006

APPENDIX A
PG&E'S PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW

Proposed Changes to Findings of Fact

22. Delete Finding of Fact 22 in its entirety.

23. Delete Finding of Fact 23 in its entirety.

24. PG&E [*delete "does not," and change "justify" to "justifies"*] its proposal to fund [*delete "various studies with the exception of"*] the impact study [*insert, "the process study"*] and the gas furnace study.

34. Delete Finding of Fact 34 in its entirety.

Insert a New Finding of Fact: *PG&E's LIEE pilot proposals and measure modification proposals are reasonable and may increase savings.*

Insert a New Finding of Fact: *PG&E's proposal to increase the CARE recertification period from two to four years for fixed income customers is reasonable and should be approved. The definition of fixed income for purposes of extended CARE recertification should include Social Security Disability Income.*

Insert a New Finding of Fact: *PG&E's LIEE administration contract with Richard J. Heath and Associates (RHA) is the result of a competitive bid process.*

Insert a New Finding of Fact: *PG&E's LIEE administration contract with RHA expires at the end of 2007 and PG&E plans to issue a new Request for Proposals to competitively select its LIEE program administrator for 2008.*

Insert a New Finding of Fact: *PG&E's proposal to implement CARE on-line enrollment is reasonable and will provide an additional option for customer enrollment.*

Proposed Changes to Conclusions of Law

14. PG&E should [*insert "use the Advice Letter process to"*] present Energy Division and interested parties with a plan for establishing cool centers [*insert "and a proposed budget to fund the cool center program."*]

15. PG&E should be granted [*delete "\$.6 million, and insert \$6 million"*] [*insert "to continue its customized in-home education in each home participating in the LIEE program"*] Delete the remainder of FOF 15.

16. PG&E should be required to conduct a competitive process for hiring a program administrator [insert “for the period commencing 2008 after RHA’s contract expires.”]. Delete the remainder of FOF 16.

17. PG&E should be provided funding for an impact study, [insert “a process study”] and a gas furnace study but not other studies. It should conduct the gas furnace study with the collaboration and approval of Commission staff as set forth herein.

28. PG&E’s budget for [insert “CARE Processing, Certification and Verification,” delete “processing and information technology”] should be set at [delete \$.9 million, insert \$1.6 million.] Delete the remainder of FOF 28.

Insert New Conclusion of Law: *PG&E’s proposal to extend the CARE recertification period from two years to four years for fixed income customers should be approved.*

Insert New Conclusion of Law: *PG&E’s proposal to remove the cap on the number of exterior hardwired fixtures that may be installed per home should be approved.*

Insert New Conclusion of Law: *PG&E’s proposal to implement an air conditioning tune-up pilot should be approved.*

Insert New Conclusion of Law: *PG&E’s proposal to implement a ceiling fan pilot program should be approved.*

Insert New Conclusion of Law: *PG&E’s proposal to install interior hardwired fixtures should be approved.*

Proposed Changes to Ordering Paragraphs

12. PG&E shall no later than February 15, 2007, submit to Energy Division [insert “an Advice Letter with”] a plan for working with local governments to establish cool centers and shall open some cool centers by summer 2007. [Insert “The Advice Letter shall also include a proposed budget for the cool center program.”]

13. PG&E shall present a plan to Energy Division no later than [delete January 30, 2007, and Insert March 15, 2007] for conducting a competitive bidding process for [insert “selection of”] its LIEE administrator for 2008. Delete the remainder of this OP.

Insert New Ordering Paragraph: *PG&E’s proposal to extend the CARE recertification period for fixed income customers from two years to four years is adopted.*

Insert New Ordering Paragraph: *PG&E’s proposal to lift the cap on the number of CFLs and hardwired exterior fixtures that may be installed per home is approved.*

Insert New Ordering Paragraph: *PG&E is authorized to implement its proposed LIEE pilot programs.*

Insert New Ordering Paragraph: *PG&E is authorized to install interior hardwired fixtures as part of its LIEE program.*

Insert New Ordering Paragraph: *PG&E is authorized to conduct the impact study, process study and natural gas furnace study. It should conduct the gas furnace study with the collaboration and approval of Commission staff as set fort herein.*

Insert New Ordering Paragraph: *PG&E is authorized to implement an on-line enrollment process for CARE.*

Insert New Ordering Paragraph: *The utilities may shift funds, as needed, among the CARE administrative activities and LIEE program categories.*

Insert New Ordering Paragraph: *The utilities may carry forward into its 2007 LIEE budget any unused 2006 LIEE funds. The utilities may also carry forward any unused 2007 funds into the 2008 LIEE program.*

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL OR U.S. MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is Pacific Gas and Electric Company, Law Department B30A, 77 Beale Street, San Francisco, CA 94105.

I am readily familiar with the business practice of Pacific Gas and Electric Company for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence is deposited with the United States Postal Service the same day it is submitted for mailing.

On the 4th day of December 2006, I served a true copy of: **COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY ON ALJ MALCOLM'S PROPOSED DECISION ADOPTING UTILITY BUDGETS FOR 2007-2008 LOW INCOME ENERGY EFFICIENCY PROGRAMS AND CALIFORNIA ALTERNATE RATE FOR ENERGY**

- By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service list for A.06-06-032, A.06-06-033, A.06-06-034 and A.06-07-001 with an e-mail address.

- By U.S. Mail – by placing the enclosed for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to all parties on the official service list for A.06-06-032, A.06-06-033, A.06-06-034 and A.06-07-001 without an e-mail address.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 4th day of December 2006 at San Francisco, California.

/s/

PAMELA TOM

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Downloaded December 4, 2006, last updated on November 30-2006

Commissioner Assigned: Dian Grueneich on July 21, 2006; ALJ Assigned: Kim Malcolm on August 2, 2006

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Total number of addressees: 83

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CPUC DOCKET NO. A0606032-A0606033-A0606034-A0607001 CPUC REV 11-30-06

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