

December 4, 2006

Docket Office  
California Public Utilities Commission  
505 Van Ness Avenue, Room 2001  
San Francisco, CA 94102

RE: Draft Decision for Application 06-06-032, Application 06-06-033, Application 06-06-34, Application 06-07-001

Dear Docket Clerk:

Enclosed for filing in the above-entitled matters are the original and seven copies of:

**“COMMENTS OF QUALITY CONSERVATION  
SERVICES, INC. ON THE DRAFT DECISION  
ADOPTING UTILITY BUDGETS FOR 2007 AND  
2008 CARE AND LOW INCOME ENERGY  
EFFICIENCY PROGRAMS ”**

Copies have been served on each person the application lists as being authorized to receive and to those on the service list of R.04-01-006.

Regards,

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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 QUALITY CONSERVATION SERVICES,  
INC. ON THE DRAFT DECISION ADOPTING UTILITY  
BUDGETS FOR 2007 AND 2008 CARE AND LOW  
INCOME ENERGY EFFICIENCY PROGRAMS**

**1. INTRODUCTION**

Quality Conservation Services, Inc (QCS) is a direct install service provider working with PG&E on their LIEE Program (Energy Partners). We currently provide Education and Installation services to low-income customers in San Francisco and Contra Costa

County. QCS supports the Utilities filings and provides the following comments on the Draft Decision.

## **2. DISCUSSION**

### **PG&E IN HOUSE EDUCATION**

The Draft Decision mischaracterizes the quality and value of PG&E's In-Home Education program (Education). The services provided to the customer during this visit are much more than brief presentation to the LIEE customer by the LIEE contractor about energy conservation and the LIEE application process. During this face-to-face visit, Certified Education Specialist<sup>1</sup> audits the home, learns about the customer's unique lifestyle and discuss with the LIEE customer specific ways to reduce the energy usage based upon those specific needs and daily lifestyle. This level of understanding and education about the customer's specific usage cannot be obtained by simply supplying customers with written energy conservation materials and is paramount in securing long-term behavior changes on the part of the customer with regard to their views on energy efficiency.

### **BUDGET REDUCTION OF A SINGLE LINE ITEM DOES NOT WORK IN A COMPETITIVELY BID CONTRACT**

As PG&E LIEE contractors, we were required to bid for our contracts competitively, based upon the prices charged for the weatherization measures. Exceptions to this competitive bid were the pre-set amounts we would be allowed to charge for certain "universal" program aspects: conduct of NGAT tests, marketing cost per LIEE

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<sup>1</sup> Certification requires a multi-week classroom and practical training course with frequent testing. Much of this effort is given to training the Specialist on procedures to interact with the customer and to provide specifically helpful suggestions geared to the individual household's needs. During this Specialist training, their employer continues to pay their salary, transportation and living expenses. These costs of such value-added training are born by their employers, PG&E's weatherization contractors.

participant, and In-Home Education. The pre-set prices for each of these were provided to us at the time of the competitive bidding. Given those pre-set prices, we were encouraged by the bid process to offer the lowest prices reasonable to secure our contracts.

All of PG&E's weatherization contractors bid for these programs knowing what the cost for the In-Home Education service was and we have built that revenue into the balance of our pricing to provide services on all levels. To remove that single line item may reduce some contractors' budgets to a point where they can no longer afford to provide the services and will be required to shut their doors and layoff all their employees. Even where this does not happen, the contractors' financial ability to supply services at their current high standards and participation levels could be seriously compromised.

It is important to note that the Draft Decision's proposed budget reduction for In-Home Educations of almost 6 million dollars represents a 7% reduction in PG&E's overall budget. However, the reduction is much more drastic for the weatherization contractor who supplies this service and who relies upon that resultant revenue as part of its overall budget to treat the homes allocated to us at the measure prices bid. On average, the education fee represents about 14% of the funds the contractor receives for weatherizing and treating each LIEE home. A 14% reduction in the weatherization service contractor's budget represents a significant reduction for customers who will be able to receive services and that seems to be contradictory to the Commission's stated goals at

this time. The elimination of this service would represent a reduction in the number of customers receiving LIEE services.

The Draft Decision seems to pick a single line item out (PG&E's In-Home Education) and say that it is not justified because it is higher than that of other utilities. This approach is unrealistic and inequitable. We expect that virtually *all* of our prices are either higher or lower for that particular item than the prices paid for that same item or measure by the other utilities. If it is justified to reduce the price for one item because it is higher than others, then it is reasonable to ask that the prices that are lower be *increased* to the levels offered by the other utilities. To require PG&E's costs on a single line item be lowered to match those of SoCalGas or SCE is inequitable unless all costs are aligned with SoCalGas and SCE's costs.

All contracts of this nature have built in overlapping costs for administrative and implementation overhead costs. For example, there is no line item pricing for trucks, insurance, training, sick leave, administration, etc. in our contracts. To assume these costs are not included to some extent in the pre-set education fee is unrealistic. Slashing the education fee without any further offsets will result in unwarranted damages to the weatherization contractors who have agreed, in good faith, to operate under the current pricing program.

**REDUCTION OF PG&E'S EDUCATION BUDGET WILL HAVE A  
SIGNIFICANT AND UNEXPLORED IMPACT ON LIEE CUSTOMERS  
AND PROGRAM'S EMPLOYEES**

QCS participated in many of the workshops and discussions leading up to this DD. In no instance do we remember a public discussion about dropping this important service from

the program. Nor did we participate in any discussion that the PG&E Education effort was not justified. The ramifications of such a move has *not* been explored or evaluated. If we had, we would have recommended the Commission require the Utilities to investigate and comment upon the impact this significant change will have on the LIEE participants, on the education specialists themselves and on the Contractors. QCS believes this issue of a high quality Education effort is just as important and may provide as much of an impact on the Program as the proposed changes to the Furnace Repair and Replacement Program, CVA issues and NGAT issues and believes it deserves just as much public discussion and consideration. To make this decision with no public input and no research as to the actual value of the Education is doing a great disservice to the ratepayers and LIEE customers. The Commission should require this item be discussed and evaluated during the required Utility sponsored quarterly public meetings before simply dropping this as a service provided to the LIEE community. **It may very well be determined that requiring SoCalGas, SDG&E and SCE to supplement their own education programs to this level of service is more valuable to the LIEE community and to the Commission's stated goals than having PG&E reduce their services to the level currently provided by SoCalGas, SDG&E and SCE.** This is not meant to criticize the efforts of those other utilities, only to point out that no one has yet taken the effort to conduct such an evaluation.

#### **COMPETITIVE BIDDING CLARIFICATION**

QCS is a strong supporter of periodic competitive bidding to determine the opportunities in the marketplace. However, in light of the fact that PG&E already has at least tentative

plans to competitively bid this contract in 2007 for PY 2008, the requirement for an immediate bid for PY2007 may provide an unnecessary disruption. It is our opinion that RHA has done a quality job and deserves the opportunity to complete its current contract with PG&E.

We recommend that the PG&E and SDG&E bidding be postponed until its originally planned 2007 schedule. The PG&E LIEE program is the nation's largest utility low income weatherization program. It is reasonable to give potential bidders a full year to organize and consider the implications. We believe this will result in a larger and more innovative group of potential bidders.

If both PG&E and SDG&E are to be bid out, we recommend that they be conducted in separate time periods. There may be lessons learned from the first bidding effort that can improve the second. A two step effort will allow losing bidders in the first to re-evaluate their proposals to improve for the second. Should the current administrator not be selected in one or both procedures, the two step process will allow for a more orderly transition of responsibilities and retention of experienced employees within the LIEE system.

### **INTERIOR HARDWIRE FIXTURES**

PG&E proposed to add Interior Hardwired Fixtures to the program as a new measure. It looks like the DD addresses this line item as a pilot measure (p.30) *“DRA and QCS support lifting the cap 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*". QCS requests the Commission be more clear in its directive and that the Commission specifically add interior hardwired fixtures as a measure and that this measure and all interior and exterior hardwired lighting measures be made available to both renters and owners of single family and multi-family dwellings. Hardwired fixtures represent long-term verifiable savings that the Commission and the ratepayers of California can count on being in place for years to come and these are not currently made available to customers in many instances. Current guidelines allow limiting these measures to certain types of residences. Considering the high cost-effectiveness of these measures, this differentiation should be specifically eliminated.

### **3. CONCLUSION**

**1. PG&E Education Budget.** No changes should be made in PG&E's approved funding for In-Home Education unless and until an evaluation has been undertaken of PG&E's program in comparison with other procedures. If funding is reduced for PG&E Education, the funds should be shifted to allow (a) for additional homes to be weatherized and measures installed and (b) for some of the other prices to be adjusted to provide some partial relief to weatherization contractors who are projected to lose 14% of their per home revenues.

**2. Public Input.** Public workshops and quarterly meetings should be used to determine the value of any measure or service before it is dropped from the program.



**3. Competitive Bidding.** Allow PG&E to conduct its bidding in 2007 for PY2008 as planned and require any SDG&E bidding to be conducted well before PG&E's.

**4. Hardwired Fixtures.** The Commission should require PG&E, SCE and SDG&E to specifically add interior hardwired fixtures as a measure and that this measure and all interior and exterior hardwired lighting measures be made available to both renters and owners of single family and multi-family dwellings.

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**CERTIFICATE OF SERVICE**

I hereby certify, pursuant to the Commission's Rules of Practice and Procedure, that I have this day served a true copy of the "**COMMENTS OF QUALITY CONSERVATION SERVICES, INC. ON the Draft DECISION adopting UTILITY BUDGETS FOR 2007 AND 2008 CARE AND LOW INCOME ENERGY EFFICIENCY PROGRAMS**".

[X] By messenger, postage prepaid to the Administrative Law Judge assigned to this proceeding, to the Assigned Commissioner, and to all parties listed with no e-mail address on Service List R.04-01-006.

AND

[X] By electronic mail serving to each person providing an e-mail address on Service List R.04-01-006.

Dated at Montclair California this 4th day of November 2006.

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## Service Lists

**Proceeding: A0606032 - SDG&E - FOR APPROVAL**  
**Filer: SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E)**  
**List Name: LIST**  
**Last changed: November 28, 2006**

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[Top of Page](#)

[Back to INDEX OF SERVICE LISTS](#)