

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 January 25, 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 10, 2007)

**COMMENTS OF
SOUTHWEST GAS CORPORATION
(U 905 G)
ON THE MAY 22, 2007
ADMINISTRATIVE LAW JUDGE'S RULING
ADDRESSING RENTER ACCESS TO
LOW INCOME ENERGY EFFICIENCY PROGRAMS,
AB 2104 IMPLEMENTATION REGARDING
TENANTS OF MASTER-METER CUSTOMER AND
CONSIDERATION OF LIEE FURNACE PROGRAMS AND
NATURAL GAS APPLIANCE TESTING**

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Dated: May 31, 2007

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ASSEMBLY BILL (AB) 2104 IMPLEMENTATION REGARDING
TENANTS OF MASTER-METER CUSTOMER AND
CONSIDERATION OF LIEE FURNACE PROGRAMS AND
NATURAL GAS APPLIANCE TESTING**

On January 25, 2007, the California Public Utilities Commission (Commission) issued an order to initiate review of the broad policies, procedures and rules for the Low Income Energy Efficiency (LIEE) programs of the California energy utilities. The Commission also seeks to adopt a long-term framework to improve the California Alternate Rates for Energy (CARE) program application process for submetered tenants of master-metered customers of electric or gas utilities, as required by AB 2104. In response, the Commission held workshops on April 17, 2007 and May 10, 2007, to address utility AB 2104 implementation and renter issues, respectively. The ALJ of record issued a ruling on May 22, 2007 directing the energy utilities to address questions either raised in the workshops or that have arisen subsequent to the workshops.

Southwest hereby provides the following responses to the questions posed in the ALJ's ruling.

RENTER ISSUES

- 1. How many houses, apartments, and mobile homes have not yet received LIEE measures? These figures should be broken down between rented units and those that are owned by customers who qualify for LIEE benefits.**

Over the past ten years, Southwest has assisted 6,372 homes under the LIEE program. However, during this time, Southwest did not track owner versus renter data. From 2005 through 2006, 1,589 homes were assisted, and 756 of these homes were renter-occupied, which is an average of 48 percent. Southwest estimates that approximately 40,000 customers are currently eligible to receive LIEE assistance. Based on the 48 percent average for renters, this totals 19,200 residences.

- 2. Are there barriers to renter participation in LIEE programs that are more critical than the limits of utility LIEE budgets? If so, what are they and what can or should the Commission do to remove those barriers?**

Southwest has not experienced barriers to renter participation and follows the rules outlined in the 2006 LIEE Statewide Policy & Procedures Manual under Section 2.7 Treatment of Rental Units. Southwest enrolls customers on a first-come, first-serve basis for the LIEE program, and does not distinguish between owners versus renters.

- 3. How detrimental is a landlord's refusal to permit LIEE installations to broaden LIEE participation by renters? Would legislation be needed or useful to overcome barriers caused by landlords? What if anything should the Commission do to promote landlord interest and cooperation?**

Based on Southwest's experience, landlords have rarely refused LIEE services for their renters. Pursuant to Civil Code 1941.1, owners are subject to providing basic services for the habitability of their tenants, including hot water and heating. Southwest believes that the LIEE program helps the owners meet these requirements and no additional action is needed by the Commission.

4. Would increased focus on marketing LIEE installations in public housing or housing owned by non-profit organizations improve renter participation? If so, does the Commission need to take any actions to promote this?

Approximately half of Southwest's LIEE participants are renters. In the past, Southwest has serviced renters living in both private and public housing and plans to continue this process. As an example, last year the Community Action Partnership of San Bernardino County partnered with a HUD multi-family housing facility in Needles and serviced 54 units. Utility funding, approved by the CPUC, was leveraged with federal and state funds to complete this project. Due to the high percentage of renters assisted through Southwest's LIEE program, no Commission action is needed.

5. Are there ways to improve access to LIHEAP funds or other funding sources that would complement the LIEE program? What should the Commission do to promote their availability?

Southwest only contracts with Community-Based Organizations (CBOs) to install LIEE services. These CBOs receive LIHEAP and DOE funding in addition to utility dollars. CBOs leverage these funds to maximize the benefit to the customer and install all possible measures in every qualified home. Thus, there is no need to further promote LIHEAP as a part of the LIEE program.

6. Are there other ways to improve the LIEE program to increase renter participation or make the program more fair or accessible to renters?

As established above, Southwest serves approximately the same number of renters versus owners and believes its current outreach methods have been successful. Therefore, at this time, Southwest does not propose additional ways to improve renter participation.

As requested in the ALJ Ruling, Southwest has attached to the comments the SMJU's workshop presentation given by Southwest at the LIEE Renter Access Workshop held on May 10, 2007 at the Commission's San Francisco Offices.

AB2104

1. How can a submetered tenant apply for CARE discounts? If the application is incomplete, what should the utility do to follow-up with the applicant to complete enrollment? What information does the submetered tenant need to provide in order to enroll in CARE?

Southwest annually sends CARE applications to the owner/manager of each master-metered facility. It is the master-metered customer's responsibility to pass the applications on to the submetered tenants. Additionally, CARE applications are sent to submetered tenants if they contact Southwest directly.

If the CARE application received from a submetered tenant is incomplete, Southwest contacts the customer via telephone, when possible. Upon meeting income eligibility requirements, a completed application is the only requirement for the submetered tenant to enroll in CARE, similar to non-submetered CARE participants. Submetered tenants may be subject to income verification.

In response to AB 2104, Southwest is in the process of developing a new CARE application directed at submetered tenants which will minimize confusion by allowing the customer to list personal information separately from the master-metered customer. This will facilitate Southwest's ability to communicate directly with the submetered tenants in the future, including mailing renewal applications.

2. How does the utility keep track of submetered tenants?

Currently, Southwest tracks all submetered data via spreadsheet software (Microsoft Excel). This data includes the submetered tenant's name, space number, date approved for CARE, denial reason (if not qualified for CARE), and correspondence tracking.

3. How does the utility renew submetered tenants' participation in CARE?

Submetered customers are required to renew their participation in the CARE program annually. Southwest mails CARE applications to the owner/manager of each

master-metered facility and requests the master-metered customer distribute the applications to its submetered tenants.

- 4. Does the utility provide master-metered customers with the names of submetered tenants who are approved to receive the CARE discount? If so, how often does that occur? What other types of information does the list provide, if any? Who receives this list? How does the utility handle the turnover of mobile home park management or owner? Would a monthly list sent to the master metered customer that request notification of change of ownership assist the utility company in managing ownership turnover?**

Southwest provides the master-metered customer with a list of the submetered tenants participating in the CARE program on an annual basis. However, the master-metered customer is notified in writing each time a new tenant enrolls in the CARE program. The submetered CARE participant list provides the master-metered customer with the submetered tenants' names, space numbers and dates approved for CARE. The list is sent to the attention of the master-metered customer at the mailing address listed on its account. For new master-metered customers, Southwest sends a "welcome letter" to explain the CARE program. The letter also describes the program requirements for receiving baseline allowance and additional medical baseline allowance. Applications for all programs are included in the welcome packet. Southwest is only aware of a change in ownership when contacted by the facility. On a monthly basis, an updated list from the master-metered customer listing the names and addresses of all tenants living in the facility would be helpful to the utilities if the utilities are required to communicate directly with all submetered tenants, not just CARE participants.

- 5. How many master-metered tenants does each utility serve?**

There are 204 master-metered accounts in Southwest's service areas – 59 with submetering and 145 without submetering. Of the 59 master-metered accounts with submetering, there are a total of 3,112 tenants.

6. How many submetered tenants are eligible for the CARE program in California?

Southwest estimates 998 submetered tenants are potentially eligible for CARE.

7. How many submetered tenants are enrolled in CARE?

Southwest had 825 submetered CARE Program participants as of December 31, 2006.

8. How do the utilities contact submetered customers or tenants to inform and enroll them in the CARE program?

As referenced above, Southwest annually mails a letter, along with CARE applications, to the manager/owner of each master-metered facility and instructs the master-metered customer to distribute the applications to tenants. Furthermore, Southwest is developing a submetered tenant CARE application that will enable Southwest to gather the tenant's personal information and directly communicate with the tenant.

9. How do utilities communicate with submetered customers/tenants when following up with customer service requests? If utilities do not provide this information, please explain why and possible methods to address these issues which may improve customer service to CARE recipients.

a. CARE enrollment status

b. Enrollment assistance

c. Verification that the CARE discount is given to the Master-Metered Account

d. Verification that the CARE discount has been given to the submetered tenant if the bill is provided.

When contacted by a submetered tenant, Southwest will confirm whether or not the tenant is participating in the CARE program and also verify that the master-metered customer was given the CARE discount on the current bill for the tenant's space number. Southwest also assists tenants if they have questions when completing the CARE application to enroll in the program. Additionally, if requested, Southwest will assist the tenant in verifying the CARE discount was passed on to them in the bill from the master-metered facility. A copy of the tenant's bill must be provided for verification.

However, Southwest's master-metered customers' tenant bills vary in format. Southwest encourages the master-metered customers list the CARE discount as a separate line item to avoid confusion for verification purposes.

10. How do utilities provide education and outreach to master-metered customers about billing and CARE discounts?

As previously stated, Southwest sends new master-metered customers a "welcome letter" to explain the CARE program. Applications are included in the welcome packet. Additional discussions are held with new customers as needed.

11. Do the utilities coordinate the outreach conducted under the LIEE program?

Beginning in 2007, Southwest plans to coordinate its LIEE outreach efforts with its CARE outreach to master-metered and submetered customers. A brochure and postcard describing the LIEE, CARE and Medical Baseline programs will be distributed throughout the master-metered submetered tenant facilities.

12. What remedial actions do the utilities take if it learns that the CARE discount has not been passed to the submetered tenant? Does the utility work with County Weights and Measures agencies to assure tenants receive the CARE discount owed to them?

Southwest has rarely found instances when the master-metered customer has not passed on the CARE discount to the submetered tenant. When Southwest discovers that a CARE discount has not been passed on, the Company notifies the master-metered customer of the error. The master-metered customer will usually re-bill the tenant with the proper billing adjustment applying the CARE discount. If the master-metered customer does not apply the discount, then Southwest advises the tenant to contact their respective County Weights and Measures Office. To date, Southwest has seldom been contacted by County Weights and Measures regarding submetered tenant complaints.

13. What can or should the Commission do to promote the CARE program among submetered tenants?

Southwest suggests the Commission conduct public outreach in conjunction with “Flex Your Power,” California's statewide energy efficiency marketing and outreach campaign. Additionally, the Commission should encourage master-metered facilities to distribute CARE applications to tenants.

14. What can or should the Commission do to assure submetered tenants receive the CARE discount the utility provides?

The Commission’s Consumer Affairs Branch, in conjunction with the Department of Weight and Measures, should correspond directly with master-metered facilities comprised of submetered tenants to explain the rules and regulations involved in master-meter billing of tenants.

15. What can or should the Commission do to improve the communication between master-meter account holders and the utility company?

Southwest rarely encounters communication problems with master-metered customers and does not believe any additional Commission action is necessary at this time.

16. What can or should the Commission do to improve the communication between the submetered account holder and the utility company?

Southwest believes the implementation of the requirements of AB 2104 will greatly improve the communication between submetered tenants and their respective utilities.

CONCLUSION

Southwest appreciates the opportunity to provide these comments. Southwest looks forward to assisting the Commission in its efforts to refine the policies, procedures and rules for the LIEE programs of California energy utilities, including adopting a long-term

framework to implement AB 2104, which will improve the access of tenants of master-metered customers to the CARE discount program.

Dated at Las Vegas, Nevada this 31st day of May, 2007.

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LIEE Renter Access Workshop

Presented by Southwest Gas Corporation

On Behalf of:

Alpine Natural Gas Company
Bear Valley Electric Service
Pacific Power
Sierra Pacific Power Company
Southwest Gas Corporation
West Coast Gas Company

May 10, 2007

Current Renter Issues

- Overview of Program
- Difference in Measures Installed
 - Owner vs. Renter
- Budget Allocation for Measures
- Participation Rates for Owners and Renters

Overview of Program

<u>Utility</u>	<u>Measures Installed</u>
Alpine	Measures installed as defined in the 2006 LIEE Program Statewide Policy and Procedures Manual*
Bear Valley	Measures installed as defined in the 2006 LIEE Program Statewide Policy and Procedures Manual* Portable lighting fixtures installed for PY 2007 – 2008 (D.06-12-036)
Pacific Power	Measures installed per LIHEAP/DOE WAP requirements
Sierra Pacific	Measures installed as defined in the 2006 LIEE Program Statewide Policy and Procedures Manual*
Southwest Gas	Measures installed as defined in the 2006 LIEE Program Statewide Policy and Procedures Manual*
West Coast Gas	N/A

*As outlined in Section 2.7. - Treatment of Rental Units

2006 LIEE Statewide Policy and Procedures Manual

■ Section 2.7 Treatment of Rental Units

2.7.1. *Property Owner Approval*

- Rental units may not be treated until a written Property Owner Waiver has been received. This approval must cover the participation of the unit in the Program as well as the installation of specific measures. Such approval is valid for a period of 12 months from the date it is provided by the property owner. If approval of the legal owner is not received prior to the installation of measures, the Contractor will be required to reimburse the utility for all payments received from the utility for treating the unit(s) in question.

Differences in Measures Installed Owner vs. Renter

<u>Utility</u>	<u>Differences</u>
<i>Alpine</i>	No furnace or water heater repair or replacement for renters*
<i>Bear Valley</i>	No difference for measures*
<i>Pacific Power</i>	No difference for measures
<i>Sierra Pacific</i>	No difference for measures*
<i>Southwest Gas</i>	No furnace or water heater repair or replacement for renters*
<i>West Coast Gas</i>	N/A

* As outlined in the 2006 LIEE Program Statewide Policy and Procedures Manual, Section 2.7.2 - Eligibility of Rental Units for Certain Measures.

2006 LIEE Program Statewide Policy and Procedures Manual

■ Section 2.7 Treatment of Rental Units 2.7.2 *Eligibility of Rental Units for Certain Measures*

Assuming that the permission of the property owner has been approved and that other eligibility conditions are met, rental units may be treated under the Program. However, the following policies relating to specific measures shall be applied.

- Rental units are eligible for evaporative coolers, air conditioners, refrigerators and hard-wired fixtures, to the extent that these measures continue to be provided under the LIEE Program.
- Rental units are not eligible for furnace replacements or major furnace repairs associated with the mitigation of NGAT fails. However, minor repairs and adjustments may be made to furnaces if these actions would improve the performance of the system at a minimal cost.
- Rental units are not eligible for water heater repairs and replacements associated with the mitigation of NGAT fails. However, services and adjustments may be made to water heaters if these actions would improve the performance of the system at a minimal cost.
- Evaporative coolers and hard-wired fixtures will be provided without charge to either tenant or the landlord. Refrigerators and air conditioner replacements will also be provided at no charge to either the tenant or the landlord, except in the instance where the landlord owns the refrigerator or air conditioning unit that is replaced and also pays the utility bill. In these instances, the utilities may make payments to installation contractors that cover only part of the cost of replacement.

Separate Budget Allocations for Renter Measures and Homeowner Measures

<u>Utility</u>	<u>Budget Allocation</u>
<i>Alpine</i>	No separate budget allocation
<i>Bear Valley</i>	No separate budget allocation
<i>Pacific Power</i>	No separate budget allocation
<i>Sierra Pacific</i>	No separate budget allocation
<i>Southwest Gas</i>	No separate budget allocation
<i>West Coast Gas</i>	N/A

Participation Rates

<u>Utility</u>	2005		2006	
	Owners	Renters	Owners	Renters
<i>Alpine</i>	83%	17%	100%	0%
<i>Bear Valley</i>	69%	31%	N/A	N/A
<i>Pacific Power</i>	66%	34%	81%	19%
<i>Sierra Pacific</i>	50%	50%	48%	52%
<i>Southwest Gas</i>	40%	60%	64%	36%
<i>West Coast Gas</i>	N/A	N/A	N/A	N/A



LIEE Renter Access Workshop

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the **COMMENTS OF SOUTHWEST GAS CORPORATION (U 905 G) ON THE MAY 22, 2007 ADMINISTRATIVE LAW JUDGE'S RULING ADDRESSING RENTER ACCESS TO LOW INCOME ENERGY EFFICIENCY PROGRAMS, AB 2104 IMPLEMENTATION REGARDING TENANTS OF MASTER-METER CUSTOMER AND CONSIDERATION OF LIEE FURNACE PROGRAMS AND NATURAL GAS APPLIANCE TESTING** on each party named on the official service list in proceeding R.07-01-042 by electronic mail or regular first-class mail.

Dated at Las Vegas, Nevada, this 31st day of May, 2007.

/s/ Valerie J. Ontiveroz

An employee of Southwest Gas Corporation

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Last Update: May 29, 2007

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