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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for Approval of the 2009-2011 Low Income Energy Efficiency and California Alternate Rates for Energy Programs and Budget (U 39 M).	Application 08-05-022 (Filed May 15, 2008)
Application of San Diego Gas & Electric Company (U 902 M) for Approval of Low-Income Assistance Programs and Budgets for Program Years 2009-2011.	Application 08-05-024 (Filed May 15, 2008)
Application of Southern California Gas Company (U 904 G) for Approval of Low- Income Assistance Programs and Budgets for Program Years 2009-2011.	Application 08-05-025 (Filed May 15, 2008)
Application of Southern California Edison Company (U 338-E)) for Approval of Low-Income Assistance Programs and Budgets for Program Years 2009, 2010 and 2011.	Application 08-05-026 (Filed May 15, 2008)

ASSIGNED COMMISSIONER'S RULING ORDERING LARGE INVESTOR-OWNED UTILITIES TO COMPLY WITH PRIOR COMMISSION/COMMISSIONER DIRECTIVES

In reviewing the Low Income Energy Efficiency (LIEE) and California Alternate Rates for Energy (CARE) applications filed by large investor-owned utilities (IOUs) Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas and Electric Company (SDG&E) and Southern California Gas Company (SoCalGas), it appears that the IOUs have not met, in part or whole, several prior Commission and Commissioner directives

this proceeding. This ruling outlines those directives and requires the IOUs to take additional steps, as follows. The deadline for each action is set forth at the end of this ruling. Each submission shall be filed and served as an "Amendment" to the individual IOU's 2009-11 budget application.

1. *Single Statewide Marketing Campaign.* My ruling of April 1, 2008 required the IOUs to detail a single statewide marketing campaign for LIEE in their May 15, 2008 applications.¹ They did not do so, and instead propose to give the Commission information on their progress toward developing a single name and tagline for the campaign on July 15, 2008. The IOUs were not granted an extension of time to meet this mandate. Further, the ruling not only requires a single program name and tagline; it also requires that the IOUs develop a full scale, coordinated marketing campaign.

Within the time period set forth below, the IOUs shall do the following:

- a. Describe the campaign in detail;
- b. Give the total budget of the campaign in pie chart or other graphical format. I understand the IOUs intend to use both Energy Efficiency program funding (Rulemaking (R.) 06-04-010) and LIEE funding on the campaign. Specify and detail the funding that will come from the LIEE program;

¹ *Assigned Commissioner's Ruling Providing Guidance for Low-Income Energy Efficiency 2009-2011 Budget Applications (Guidance Document)*, filed April 1, 2008, Section V(D)(1): "1. Single statewide marketing campaign: Describe how the utilities will develop and use coordinated marketing efforts for the LIEE program, including a single tagline." See also Decision (D.) 07-12-051, *mimeo*, p. 45.

- c. Identify all names and taglines under consideration, and complete the process of selecting both so that other parties have the opportunity to comment.

2. *Integration and Leveraging.* The Commission ordered the IOUs to integrate their internal demand side programs and leverage outside resources to avoid duplication of effort and expand the pie of available funding. Specifically, the Commission directed the IOUs to “broaden the scope of their efforts, and coordinate with other agencies and businesses in designing, delivering and implementing LIEE programs.” The Commission also stated that “we expect them to take advantage of the resources, marketing and advertising efforts of other utility demand-side management programs, such as the CSI and energy efficiency programs.” D.07-12-051, *mimeo*, p. 35.

The IOUs address this issue in their applications, but it is unclear how much of what they propose is new. For example, in several places, the IOUs state that they will “continue” an effort, signaling that the effort is not new. Therefore, each IOU shall provide a list describing all new efforts to a) integrate their various demand-side programs (integration), and b) employ all available resources and coordinate with others in pursuit of those resources (leveraging), and shall provide a comparison document that contrasts what the IOUs now propose with what they have done in the past. The list describing all new efforts should include details on each effort. The IOUs shall provide comparisons of past budgets and present budgets aimed at these efforts.²

² SCE offers 14 ideas for integration with Energy Efficiency efforts, but should provide the other information in this request.

3. California Solar Initiative. Each IOU notes that it will install all feasible LIEE measures into homes eligible for funding under the California Solar Initiative (CSI), but they do not give details on how they will coordinate with the CSI efforts at the Commission or in their own companies to see that this happens right away. PG&E notes it will "fast track" qualified CSI customers through LIEE, but we need more detail from PG&E on how this will happen, and similar information from the other IOUs. Similarly, SDG&E proposes to work with the CSI single-family and multi-family program administrators to coordinate efforts between the CSI and LIEE programs to ensure that homes that receive CSI program measures have first received appropriate LIEE measures, but again, more details are needed. The other IOUs do not provide details.

4. Graphics summarizing applications. I order the IOUs to file and serve color pie charts or graphs summarizing the following elements of their 2008-11 LIEE applications:

- a. Program measures and installations by measure group.
- b. Annual MWh savings by measure group.³
- c. Energy savings in 2007 (actual), 2008 (authorized) and 2009, 2010 and 2011 for total program portfolio.
- d. Budgets in 2007 (actual), 2008 (authorized) and 2009, 2010 and 2011 for total program portfolio.
- e. A comparison exhibit prepared by all IOUs jointly that compares items a-d across IOUs.

³ See SCE pie charts on page 13 of its application for guidance on items a and b.

f. Changes in LIEE measures (and related budgets) from the prior budget cycle to the 2009-2011 cycle.

g. New LIEE measures proposed in the 2009-2011 budget cycle.

5. *Water Conservation.* D.06-12-038 directs each IOU to file a specific program proposal for water conservation efforts. Each proposal shall identify specific ways to implement such energy efficiency water conservation programs for low income customers, whether and how they might dovetail with other non-LIEE programs, which agencies they will work with, and a budget. If the proposals include studies, the studies must be described with specificity and must be justified from a budgetary standpoint.

6. *Education.* D.06-12-038 directs the IOUs to include in their energy education materials a discussion of the benefits of energy efficiency programs in efforts to reduce green house gasses and promote water conservation. According to D.07-12-051, "LIEE programs should emphasize effective ways to inform customers of the benefits to themselves and their communities of conservation and energy efficiency measures, as well as the way energy efficiency promotes environmental values and reduces greenhouse gases." D.07-12-051, *mimeo.*, p. 3. I understand PG&E has developed a flyer on this topic, but I am unaware of other IOUs' efforts. All IOUs shall file and serve details and exemplars showing compliance with this requirement.

7. *Workforce Education and Training.* We note for informational purposes that the Low Income Oversight Board (LIOB) has established a Workforce Education and Training subcommittee to develop a proposal for inclusion in the statewide strategic plan to establish programs to train the future workforce for energy efficiency programs, including the LIEE program. The

LIOB will give notice of a meeting to be held in Northern California to explore this topic.

IT IS RULED that:

1. On or before July 1, 2008, Pacific Gas & Electric Company, Southern California Edison, San Diego Gas and Electric Company, and Southern California Gas Company, shall file and serve responses to Questions 1 - 7 above.

2. The IOUs shall follow the Workforce Education and Training (WE&T) efforts of the Low Income Oversight Board and synthesize those efforts, as practicable, with their own WE&T programs.

Dated June 13, 2008, at San Francisco, California.

/s/ DIAN M. GRUENEICH

Dian M. Grueneich
Assigned Commissioner

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I have provided notification of filing to the electronic mail addresses on the attached service list.

Upon confirmation of this document's acceptance for filing, I will cause a Notice of Availability of the filed document to be served upon the service list to this proceeding by U.S. mail. The service list I will use to serve the Notice of Availability of the filed document is current as of today's date.

Dated June 13, 2008, at San Francisco, California.

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