



Low-Income Oversight Board
LINA Committee

July 31, 2020

The Honorable President and Commissioners
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Sent via Email

Subject: Low-Income Oversight Board LINA Committee Recommendations

Dear President Batjer and Commissioners:

The LINA Committee of the Low-Income Oversight Board (LIOB) is pleased to provide its recommendations for the upcoming Low-Income Needs Assessment (LINA) and subsequent studies in the future. The findings of the LINA and its recommendations provide for the planning and the implementation of the next cycle of low-income energy efficiency programs and specifically, the ESA and CARE Programs. The LINA Committee adopted the recommendations outlined below following a 4-0-1 vote during the July 21, 2020 meeting. The Committee consists of the Chair, Vice Chair, two public members and the IOU representative. The IOU representative abstained.

As you may know, the LIOB exists to advise the Commission on low-income ratepayer issues related to gas, electricity, water and certain aspects of the Lifeline program related to coordinated outreach with the CARE program. Section 382.1 of the California Public Utilities Code specifies that the LIOB shall, "Assist in the development and analysis of any assessments of low-income electricity and gas customer need." The code also specifies the parameters of this assessment as follows:

Beginning in 2002, an assessment of the needs of low-income electricity and gas ratepayers shall be conducted periodically by the commission with the assistance of the Low-Income Oversight Board. A periodic assessment shall be made not less often than every third year. The assessment shall evaluate low-income program implementation and the effectiveness of weatherization services and energy efficiency measures in low-income households. The assessment shall consider whether existing programs adequately address low-income electricity and gas customers' energy expenditures, hardship, language needs, and economic burdens.¹

To meet its statutory obligation, on June 7, 2017, the LIOB formed a LINA Committee to address this issue with the mission of seeking and identifying recommendations to the Commission to assist in the development of the LINA study. At that time, an existing LINA was already in the process of soliciting bids, so the Board chose to make recommendations for the subsequent LINA. The release date for this specific RFP is TBD for this August, but we have the assurance of the LINA team (SCE and the Energy Division) that they will thoroughly consider these recommendations. For reference, while statute does not require the IOUs to lead the RFP process for the assessment of low-income ratepayer needs, it is our understanding this has been the practice since these assessments began in 2002 to ensure the timeliness of completion within the required three-year window.

¹http://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PUC&division=1.&title=&part=1.&chapter=2.3.&article=7.



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Following deliberation by the LINA Committee and subsequent vote of approval, the Committee presents the following recommendations for your consideration.²

Research Questions and Recommendations to Include in the Upcoming LINA

- Public Safety Power Shutoffs (PSPS): Given PSPS are expected to continue for the next decade, what new or expanded measures can be incorporated into ESA and/or other programming to ensure the health, comfort and safety of impacted low-income ratepayers? What other measures can the Commission add for a multiple disaster scenario such as PSPS and the Pandemic and/or natural disasters such as an earthquake, flood, fire, etc.?
- Survey Budget: Perhaps the greatest source of data for the LINA is survey data. The survey includes English and Spanish speaking households only. Many of the fastest growing demographics of low-income households in California speak a (primary) language that is not English or Spanish. The Committee recommends the survey include additional languages and use census or other reliable data to determine what additional languages to include in the survey.
- Definition of Low-Income: The ESA and CARE Programs have an eligibility of 200% of the federal poverty level. As reflected by the supplemental poverty index, the cost of living in California greatly exceeds this threshold. The Committee recommends the Study state this, ideally in the Executive Summary section.
- Disconnections: What is the relationship between disconnections and CARE penetration rates at the smallest possible measurable level (zip code, census tract, census block, etc.)? Is there a relationship between households dropped from CARE and (subsequent) disconnections?
- Coordination with other public assistance programs: What are the barriers to coordinating enrollment into CARE/ESA with other public assistance programs such as those administered by counties and other government agencies?
- Additional Measures: Aside from those to mitigate the impacts of PSPS, what additional ESA measures/offerings could the Commission include to meet the needs of low-income ratepayers?

Structural Considerations

- Scoping Team: The Commission may consider including a member of the LIOB as a part of the LINA scoping team.
- Criteria for RFP: Allow the LIOB to have input and review the criteria that SCE or another administering agency of the Study (if changed) uses to evaluate bids.
- Applicant Pool: The LINA team noted the applicant pool of the last several LINAs consisted of many of the same firms and organizations. The Committee recommends outreach to nonprofits and academic institutions well in advance of the subsequent

² LINA Committee meeting, July 21, 2020



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planning process to ensure they have the opportunity to compete and understand the IOU procurement process.

- Diversity and Inclusion: The Committee recommends the Commission use all tools it has available to ensure inclusivity of women and minority led Organizations with respect to the RFP and prospective applicant pool.

Should you have any questions regarding this matter, please contact the LIOB Chair at Benito.LIOB@gmail.com or 510.569.5862. You may also contact the Energy Division.

Thank you for your attention and consideration.

Kind Regards,

Benito Delgado-Olson
LIOB Chair

Maria Stamas
LIOB Vice Chair

Robert Castaneda
Public Member

Lourdes Medina
Public Member