



Community Action Commission of Santa Barbara County

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Low Income Oversight Board
California Public Utility Commission

RE: Request for comments on Competitive Bidding.

September 4, 2007

The Community Action Commission of Santa Barbara County would like to respond to the request for comments about "Competitive Bidding" for Administration of the LIEE program. The Community Action Commission is a private non profit agency serving our low income clients through several programs which include Children's Services, Family and Youth Services, Nutrition Services, and our Energy Services weatherization program. Our clients range from families with toddlers to senior citizens who receive the benefits of the HEAP, weatherization and nutrition services the agency provides. As an agency we would ask the CPUC not to open the LIEE program to competitive bidding as we see the possibility the following could occur.

- The process could open up the possibility for a "LIEE Program Administer" monopoly in the state, because there are very few qualified agencies or business in the state to take on such a task.
- Any administer of the LIEE Program for the utilities could use or create its own weatherization business contractors to compete with CBO's and current private contractors and would be able to "fix" the results.
- Implementation of a "LIEE Program Administer" other than the IOU adds another lever of cost (taking money out of the LIEE Program) that is not available to the low income sector.
- Putting the process out for competitive bidding on a regular basis would create the possibility the current program administrator could lose the bidding and the new program administrator could disrupt the program continuity and client services.
- Putting the process out for competitive bidding for SCG and SCE could disrupt the program continuity and client services.
- As in previous years a drop in CBO participation would probably be experienced.
- CBO's working with IOU is in the best position to meet the requirements of Pub. Util. Code 327 and 381.5
- There would be a great loss of expertise and existing trained personnel.
- There would also be a lost of trust within the communities we serve.
- The program would be more open for fraud and mismanagement of services.

Respectfully

Fran Forman
Executive Director