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Witnesses: Linda C. Fontes
Dan C. Quigley
Frances L. Thompson
Mardi E. Walton

PACIFIC GAS AND ELECTRIC COMPANY

TESTIMONY IN SUPPORT OF APPLICATION FOR THE 2009, 2010, AND 2011 LOW-INCOME ENERGY EFFICIENCY PROGRAM AND THE CALIFORNIA ALTERNATE RATES FOR ENERGY PROGRAM

PREPARED TESTIMONY



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A. Summary of Critical Program Elements and Requests

- Pacific Gas and Electric Company (PG&E) seeks approval of the proposed 2009-2011 application no later than October 2, 2008 to ensure no interruption of Low Income Energy Efficiency (LIEE) programs and services or delay in the Request for Proposal (RFP) process.
- PG&E seeks program and budget flexibility to move funds between all LIEE program categories.
- PG&E proposes to greatly expand the scope of its LIEE program and the number of homes to be treated for 2009-2011. PG&E proposes to make available to 25 percent of its low-income customers (approximately 300,000 homes) an opportunity to participate in this program by the end of 2011. This is an increase from approximately 60,000 homes per year to 100,000 homes per year.
- PG&E proposes coordinating its LIEE efforts with the other investor-owned utilities (IOU) as well as leveraging with its internal California Alternate Rates for Energy (CARE), Energy Efficiency (EE), California Solar Initiative (CSI), Demand Response (DR), and SmartMeter™ programs.
- PG&E proposes a multilayered approach to offering LIEE programs, with three separate electric tiers and two separate gas tiers. In addition, customers with lower energy use can receive all needed energy efficiency measures through a "hardship override mechanism." There are also climate-related measures pertaining to heating and air conditioning.

- PG&E proposes to conduct nine pilot projects to enhance program effectiveness and five studies to evaluate program performance.
- PG&E proposes a methodology to determine the calculation of the eligible low-income population, 25 percent of which must be treated by the end of 2011.
- PG&E proposes that cost recovery for Natural Gas Appliance Testing (NGAT) be addressed in this proceeding and not the General Rate Case (GRC) in order to align the number of homes treated with the funding for the related NGAT work.
- PG&E proposes an expansion of the REACH-PLUS crisis
 management fund for its low income customers, which was originally
 approved by the California Public Utilities Commission (CPUC or
 Commission) in September, 2006.

B. Program Overview

 PG&E is pleased to present its application for the Program Years (PY) 2009-2011 LIEE program. PG&E has administered the LIEE program since 1983.

PG&E's filing today is specifically designed to reflect the California Energy Efficiency Strategic Plan's (CEESP) objectives of making these LIEE programs available to more customers, improving their cost-effectiveness, and designing them in such a way as to improve their contribution as a reliable energy resource. PG&E is also retaining its traditional commitment to ensuring that these programs add to the participant's quality of life by helping them reduce the financial burden of their energy bill and by improving their health, safety and comfort. Most importantly, this application reflects our commitment to serve 25 percent of all eligible LIEE customers within the 2009-2011 time frame, to provide all eligible customers the opportunity to participate in the LIEE programs by 2020, and to offer all those who wish to participate all cost-effective energy efficiency measures by 2020.

Achieving these goals is a major step forward for the LIEE programs and, as the Commission predicted, has required that PG&E remain open to shifts in LIEE program and portfolio design. It has also opened the

door to look at many innovations through an extensive pilot program and five new energy evaluations and market studies that are designed to help us achieve the LIEE programmatic initiative. For the first time in this proceeding, PG&E has sought the inclusion of a crisis management fund, which it believes will significantly augment the level and array of services provided to its low-income community. PG&E believes that the new program taken as a whole provides a portfolio that serves customers today, includes important foundational experiments for tomorrow, and thoughtfully balances all of the Commission's objectives.

 First, PG&E proposes a total budget of \$422,338,000 for the three years. [1] The currently authorized amount for 2007-2008 is \$77.7 million per year, excluding \$2.84 million NGAT funds that were funded in the GRC. With that, PG&E proposes to install measures in 25 percent of the eligible homes (approximately 300,000 homes) during the 2009-2011 timeframe. This is a significant percent increase from our current programs, which provide services to only about 4 percent of eligible customers per year.

To achieve such significant growth in a relatively short period of time, PG&E had to dramatically re-imagine its low-income program offerings. In effect, PG&E pulled out a blank sheet of paper and started from scratch. To solicit ideas, PG&E participated in Commission workshops and sought input through focus groups, meetings, and workshops with Commission staff as well as interested parties, including municipalities, community-based organizations, government agencies, Low Income Home Energy Assistance Program (LIHEAP) providers, and contractors. PG&E also worked with utility staff with expertise in EE, CARE, DR, Solar, SmartMeter™, and other utility programs. These meetings generated very useful ideas that have been incorporated into the 2009-2011 LIEE Program design.

The total budget includes \$30 million over the three years for the Relief for Energy Assistance through Community Help (REACH) PLUS Program. The budget also includes \$3.5 million in NGAT funds for 2009, and escalating amounts in the subsequent years (\$2.84 million of this amount will be transferred from the GRC).

Next, we performed detailed cost-effectiveness studies on existing LIEE measures as well as other ideas drawn from the parties, residential EE, DR and SmartMeter™ programs. This resulted in adding some new measures, and allocating the measures differently across customer and market segments based on cost-effectiveness linked to climate zones, geography, usage and the ability to leverage distribution partnerships with local governments, non-profits, and community based organizations.

PG&E overlaid the program goal to reduce low-income customer's energy-bills and address concerns about health, safety and comfort. Reducing low-income customer's energy-bills helps both the LIEE customer as well as other PG&E customers by lowering the CARE subsidy for inefficient energy use. Consequently, certain non-cost-effective measures were re-introduced back into the LIEE program portfolio, particularly for customers with higher bills, more extreme climate conditions and/or greater than usual hardship conditions.

PG&E added nine new pilots and five new studies to explore promising new measures, approaches, and partnerships. The result is a rich mix of program offerings and experiments that are: (1) cost-effective; (2) equity-based; (3) innovative; (4) integrated with PG&E's CARE, DR, Solar, SmartMeter™, and EE programs; and (5) responsive to the Commission's guidance and the parties comments.

A brief description of the programs follows and is described in detail with tables and charts throughout the application. Very few measures exceeded a cost-effectiveness ratio of 1, so PG&E added back in all measures exceeding a cost-benefit ratio of 0.5. The measures added back in include energy education, compact fluorescent lamps (CFL), interior light fixtures, occupancy sensors, refrigerators, torchieres, water heater blankets, low flow showerheads, faucet aerators, and pipe insulation. Torchieres and occupancy sensors are new measures starting in 2009. PG&E proposed pilots are also designed to test the impact on energy savings from the use of microwave ovens and high efficiency clothes washers.

All other measures included in PG&E's proposed LIEE program fell below the 0.5 cost-effectiveness cutoff point (in some cases they were as

low as 0.02). Measures were then strategically added back into the LIEE portfolio based on energy usage, health, safety and comfort issues related to hot and cold climates, and hardship cases for lower energy users. These measures include evaporative coolers, window/wall air conditioning, exterior light fixtures, attic insulation, air conditioning tune-up, weather stripping, utility gaskets, caulking, duct testing/sealing, and minor home repair. Tables showing the distribution of measures are included in Section V.B.

Additionally, PG&E will also be conducting nine important pilot projects and five studies during 2009-2011 to determine how best to continue expanding and upgrading all aspects of its LIEE programs. The pilot programs and the strategic elements that they support are as follows:

New Measures: In three pilots, PG&E will test the feasibility and cost-effectiveness of providing new measures, including high efficiency clothes washers (providing both water and energy efficiency), SmartMeter™ education, and DR air conditioning education.

New Partnerships: In five pilots, PG&E will partner with new entities ranging from local neighborhood groups to two widely recognized national organizations: Meals on Wheels and Habitat for Humanity.

New "Green" Job Training: Two of PG&E's pilots help find new ways to identify and train local community members as energy efficiency contractors thus increasing the availability of a skilled workforce.

New Leveraging Opportunities: Five pilots engaged in leveraging existing community contacts to find and serve traditionally hard-to-reach low and very-low income customers, including shut-in seniors and disabled, near homeless families with children, neighborhoods in so much need that they require complete revitalization, rural and/or remote populations, and non-English speaking families.

New Education Strategies: Four pilots aimed at helping to develop, refine, and expand our energy efficiency education methods for customers and contractors, including on-line training materials for contractors and targeted DR and SmartMeter™ education for low-income customers.

New Outreach Strategies: Three pilots to explore new ways to educate hard-to-reach rural customers as well as seek these customers' input for overall energy education program improvements.

New Combination of Public/Private Services: And finally, two of the

New Combination of Public/Private Services: And finally, two of the pilot's leverage and compliment local government services to provide a comprehensive and seamless approach to community well being that addresses physical safety, economic security, empowerment and environmental sustainability.

PG&E also proposes five new studies on:

- Non-Energy Benefits: To better assess non-energy benefits for inclusion in cost-effectiveness studies, which may make more measures cost-effective;
- Household Segmentation: To learn more about which customers are most likely and willing to participate in low-income programs;
- Refrigerator Degradation: To measure the durability of refrigerator savings;
- LIEE Process Evaluation (with a focus on Energy Education): To evaluate the effectiveness of LIEE education strategies; and
- LIEE Impact Evaluation: To evaluate and assess the energy savings of the new LIEE programs.

Finally, PG&E will: (1) leverage its CARE contacts, which provide significantly more customers than needed for the 25 percent target during 2009-2011; (2) incorporate CARE and LIEE enrollment into the Section 8 public housing intake process; (3) support LIHEAP by waiving the minimum measure rule, supporting federal legislation, and continuing the refrigerator leveraging program; (4) support the CSI by ensuring all LIEE EE retrofits are performed before solar panels are installed on low-income homes; (5) expand funding of the REACH PLUS Program; and (6) achieve economies of scale by bulk purchasing products where possible.

In total, this represents significant changes and improvements for the LIEE programs. As PG&E learns from all these new pilots, studies, and approaches, it will continue to redefine the best ways to cost-effectively

serve low-income customers, provide a reliable low-income energy resource for the state, and still protect customers' health, safety and comfort without overburdening all the other customers who must pay for these energy efficiency services.

In this application, PG&E requests:

- Approval of PG&E's 2009-2011 LIEE program budget, plans, measures, pilots and studies
- Full authority to shift funds among program categories in 2009, 2010 and 2011 and authorization to carry forward or carry back funding during the 3-year funding cycle
- A timely LIEE Program decision or interim authorization from the Commission to continue LIEE activities into 2009 should a decision be delayed

PG&E will consolidate the electric revenue requirement authorized in this proceeding into electric rates in the Annual Electric True-Up (AET) with other rate changes effective January 1 of each year in the program budget period, or as soon thereafter as possible. PG&E will consolidate the gas funding requirement authorized in this proceeding into gas rates in the annual gas Public Purpose Program (PPP) surcharge advice letter and Annual Gas True-Up (AGT) filings with other rate changes effective January 1 of each year in the program budget period, or as soon thereafter as possible. If a decision is not issued in time to incorporate the proposed funding requirement in PPP surcharge rates by October 31, 2008, PG&E requests authority to supplement its PPP surcharge advice letter to incorporate changes adopted in this proceeding.

II. Background

The LIEE Program, also known at PG&E as Energy Partners, helps low-income customers reduce their energy consumption and costs while increasing their comfort, health and safety. The program provides free home weatherization, energy efficient appliances, and energy education services to qualified low-income PG&E customers throughout PG&E's service area. The

LIEE program is funded through a public purpose charge on customer utility bills.

Customers are qualified based on CARE income guidelines of up to but not exceeding 200 percent of the federal poverty level guidelines (with income adjustments for family size), as defined by the Commission.

Since 1983, PG&E has treated over 920,000 homes in the LIEE program. During the 24 years PG&E has managed the LIEE program, customers have saved over \$394 million on their energy bills, reduced electric use by over 316,000 megawatt-hours (MWh), and reduced natural gas use by over 37 million therms. PG&E forecasts it will treat approximately 300,000 homes between 2009 and 2011, over 25 percent of PG&E's willing and eligible low-income customers, as described in Section III.A.

Decision (D.) 07-12-051 directed the development of a Strategic Plan for LIEE through 2020, established a 3-year program planning cycle for 2009-2011, and required LIEE and CARE Program Applications by May 15, 2008.

PG&E's 2009-2011 LIEE program follows the policies and guidance given in Decision 07-12-051, that established the following programmatic initiative for LIEE:

To provide all eligible customers the opportunity to participate in the LIEE programs and to offer those who wish to participate all cost-effective energy efficiency measures in their residences by 2020.

Decision 07-12-051 committed to changing the way LIEE programs are approached by adopting the following policies and guiding principles:

- The complementary objectives of LIEE programs will be to provide an energy resource for California while concurrently providing low-income customers with ways to reduce their bills and improve their quality of life;
- LIEE programs should emphasize opportunities to save energy;
- LIEE programs should be designed to take advantage of all cost-effective energy efficiency opportunities;
- LIEE programs should include measures that may not be cost-effective but that may promote the quality of life of participating customers;

- 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 (GHG);
 - LIEE programs should be integrated with other EE programs to allow the
 utilities and customers to take advantage of the resources and experience
 of EE programs, promote economies of scale and scope, and improve
 program effectiveness; and
 - LIEE programs should take advantage of other resources, such as federally-funded programs, local efforts, the work of businesses and publicly-owned utilities (POU).

III. Program Goals

California is demanding the next generation of energy efficiency measures to meet its energy, environmental and economic goals to 2020 and beyond. In Decision 07-12-051, the Commission called for a fresh look at LIEE programs. The purpose is to consider an expanded role for LIEE programs as an energy resource for California, working in concert with other efforts to address climate change and for meeting the needs of more low-income customers.

Decision 07-12-051 directed that LIEE be considered as an integral element in the statewide EE strategic planning efforts currently underway, and initiated in the Commission's EE decision, Decision 07-10-032, under the direction of Assigned Commissioner Dian Grueneich. Up-to-date information about the Strategic Plan and the strategic planning process—including information about the many public meetings and workshops held throughout the planning period—can be found at the *California 2009-2020 Energy Efficiency Strategic Planning* website, www.californiaenergyefficiency.com.

The California Energy Efficiency Strategic Plan (CEESP)—will be prepared and filed jointly by PG&E, Southern California Edison (SCE), San Diego Gas & Electric (SDG&E) and Southern California Gas Company (SoCalGas) on June 2, 2008—is the first step in a new, ongoing, statewide strategic planning effort. The objective of this effort is to define innovative new paths to aggressively deliver energy efficiency to homes, offices,

factories and farms—and to significantly contribute to the state's goal of having a reasonably priced, stable, reliable and clean portfolio of energy resources.

LIEE strategies discussed in the CEESP include:

- 1. Develop customer segmentation to improve program delivery, increasing the opportunities for program participation and energy savings.
- 2. Pursue collaboration and leveraging of other programs.

- Integrate LIEE programs with energy efficiency and other demand-side programs.
 - Develop and integrate LIEE workforce training requirements into the Workforce Education and Training (WE&T) strategy aimed at reaching minority and other disadvantaged communities.
 - 5. Specify and employ program elements that emphasize long-term and enduring energy savings.
 - 6. Specify and deploy Marketing, Education and Outreach (ME&O) for LIEE Program consistent with energy efficiency strategies.

All short-term CEESP strategies are incorporated in this 2009-2011 Low Income Program Application. The 2009-2011 LIEE program elements, including pilots and studies, are foundational and are all designed to enable PG&E to achieve longer-term statewide 2020 goals.

A. Program Achieves 25 Percent of Programmatic Initiative

In Decision 07-12-051, the Commission directed PG&E, SoCalGas, SDG&E and SCE ("joint utilities" or "utilities") to file applications for 2009-2011 LIEE and CARE budget authority and program modifications. It also instructed that the utilities' applications be designed to achieve over the three-year budget period approximately 25 percent of the programmatic initiative adopted in the decision. In order to develop plans for program years 2009 through 2011 and estimate the number of LIEE customers on which to base 25 percent of the Commission's programmatic initiative adopted in Decision 07-12-051, the joint utilities developed a starting or base point as described below.

First, to derive the number of customers potentially eligible for LIEE services in each utility's service area, the utilities used the joint utility methodology adopted by the Commission in Decision 01-03-028. The

joint utility methodology is used to annually estimate the number of customers eligible for LIEE and CARE services, for each utility area, and for the state as a whole. [2]

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Second, the utilities determined how many customers had been previously served by the LIEE program in the past. Historically, the utilities have looked at the ten year rule and counted all of those homes treated in the last 10 years as homes that had previously been served by the LIEE program, and therefore were not currently eligible for participation. However, Decision 07-12-051 directs the utilities to "eliminate or modify the ten year 'go back' rule to permit installations of new measures and technologies in all households while avoiding duplicative installations." When evaluating this requirement and assessing the levels of service provided to customers over the past 10 years, the utilities decided that the number of customers who had been served since the end of 2001 when "Rapid Deployment" measures were included in the program-best represented the number of customers who had received "all feasible measures." Thus, 2002 was selected as the base year, because very few new measures have been introduced since that time, and because larger saving measures, such as air conditioning were implemented in the program as "go-back" measures.

The utilities also agreed that customers who have been served by the federal government's LIHEAP should also be considered as customers who have been served by the LIEE program because LIHEAP offers most, if not all, of the same measures provided by LIEE, and some not offered by LIEE. Moreover, any home that has been served by LIHEAP would also be deemed ineligible for service under LIEE at the time of an assessment because these homes have already been made energy efficient and should not need any measures or services offered under the LIEE program.

^[2] Sources for this estimation include the Commission's current guidelines, current year small area vendor marginal distributions on household characteristics, Census Public Use Microdata Sample (PUMS) 2000 and PUMS 2004-2006 sample data, utility meter and master meter household counts, Department of Finance CPI series, and various Geographic Information System (GIS) sources.

The third step in developing a base point was to estimate how many customers would likely decline to participate in LIEE. After much discussion regarding an appropriate number to ascribe to this segment of the low-income population, the utilities decided to use a figure equal to ten percent of the eligible population, which is consistent with the estimates of low-income eligible customers choosing not to participate, provided by KEMA in its final Needs Assessment Report.

The method for calculating 25 percent of PG&E's estimated eligible

TABLE III-1
PACIFIC GAS AND ELECTRIC COMPANY
25 PERCENT PROGRAMMATIC INITIATIVE METHODOLOGY

low income customers is demonstrated in Table III-1:

Line No.	PG&E Customers	Parameter
1	1,782,605	A. Estimated eligible for 2008
2	411,672	B. Number served by LIEE 2002 through 2008 (actuals plus estimate for 2008)
3	1,370,933	C. Subtract A – B
4	86,537	D. Number served by LIHEAP 2002 through 2008 (actuals plus estimate for 2008)
5	1,284,396	E. Subtract C – D
6	178,260	F. 10 percent of A that are estimated as unwilling to participate
7	1,106,136	G. Subtract E – F. This is the Base point for calculating 25 percent of the programmatic initiative
8	276,534	H. 25 percent of programmatic initiative to achieve in PY2009 through 2011

The utilities recognize that the number of homes served and the number of customers unwilling to participate need to be tracked in order to best develop this estimate. The utilities have been tracking the number of homes served for a number of years and will continue to do so in the future.

However, tracking the number of customers who are unwilling to participate in the LIEE program is a difficult process. This group of customers is made up of two subcomponents. The first subcomponent is comprised of customers who provide an affirmative rejection for program

participation.[3] Plans are in place to include this functionality in the utilities' data systems. The second subcomponent consists of customers who are contacted multiple times by the utilities and the utilities' contractors, but who do not provide any type of affirmative acceptance or rejection for program participation. The most pressing issue to address is how much time and money the utilities should expend to continue to reach these customers, and at what point do the utilities stop utilizing their resources to enroll a specific customer? Of special concern to the utilities are those customers who have received multiple direct mail pieces, telephone calls and actual in-person visits, but who still fail to respond affirmatively. Until more data can be gathered and analyzed, and to maintain consistency with the KEMA Report, the utilities will include this subcomponent of customers in the ten percent estimate detailed above.

The utilities have agreed to continue to work together to refine this standard means of deriving the number of LIEE customers on which to base the achievement of the Commission's programmatic initiative.

B. Program Meets Policy Objectives

PG&E's proposed PY2009-2011 LIEE program will meet the Commission's key policy objective for LIEE programs: providing cost-effective energy resources in the form of energy savings while reducing low-income customers' bills.

PG&E's program emphasizes opportunities to save energy and takes advantage of the most cost-effective energy efficiency opportunities. Decision 07-12-051 specifies that LIEE programs should include measures that may not be cost-effective but that may promote the quality of life of participating customers. PG&E's program addresses these concerns.

Because so few measures are truly cost-effective to offer in the LIEE program, PG&E determined to offer those measures that are *most* cost effective to all qualifying customers for whom they are feasible. PG&E's energy usage approach provides an additional variable to climate zone

The Division of Ratepayer Advocates (DRA) agrees that this subcomponent of information should be considered when the utilities track the number of customers who have been offered LIEE services.

and housing type factors that are currently used to help determine what components of the LIEE program are feasible for individual customers.

Additionally, some less cost-effective measures providing high energy savings are also offered to customers based on their higher energy use. Other factors such as climate zone and housing type will still determine whether a particular measure is feasible to install. Thus, less cost-effective measures are available to customers based on a combination of factors, including use (and all that determines use, including household size, consumption behavior, and appliances-owned), climate zone, and housing type. The only new variable is energy use, however, that is largely determined by other factors such as weather and housing type that have always been criteria under the LIEE program.

Decision 07-12-051 also specifies that the LIEE program emphasize ways to inform customers about conservation benefits. PG&E's 2009-2011 program offers comprehensive, in-home energy education to all LIEE customers. In addition, PG&E's portfolio has several pilots that further develop, refine, and expand our education methods, both for customers and contractors. PG&E's proposed process evaluation will have a particular focus on energy education to help the utility understand what methods work the best in order to refine and leverage successful practices.

Decision 07-12-051 requires that the LIEE program integrate with other energy efficiency programs and take advantage of other resources. As described in Sections V.E and V.F, PG&E leverages its LIEE program with other EE and low-income programs, both within PG&E and with other agencies. PG&E will continue to coordinate and leverage its internal CARE, EE, CSI, DR, and SmartMeter™ programs. Finally, PG&E is exploring ways to coordinate with other agencies and programs offering low-income services. In this application, PG&E proposes several pilot projects that promote partnership and leveraging opportunities.

C. Goals by Population/Segments

Attachment C-3 shows PG&E's LIEE participation targets per year by gas and electric usage, based on the 3-level electric and 2-level gas LIEE program proposal recommended in this application.

PG&E will also track LIEE participation by other key customer segments, including geography, rural/urban, climate zone, housing type, renter/owner, seniors and disabled customers. Although PG&E does not have specific targets in these areas (except for geography, which will be specified for each subcontractor), PG&E has information on the percentage of its low-income customers that populate each segment. As part of its regular internal tracking and reporting process, PG&E will compare the incidence of low-income customers in these segments of the population to their LIEE participation rates to assure that all low-income customers are being treated on an equitable basis. PG&E will take action to target any of these population segments that are not being treated commensurate to their incidence in the low-income population in PG&E's service area, through appropriate methods, such as direct mail, targeted outreach, and partnering with community agencies.

In Section V.H., PG&E is proposing a low-income household segmentation targeting study with SCE to help identify and better outreach to specific segments of the low-income population.

D. Program Meets Savings Goal

Attachment A-2 shows the LIEE 2009-2011 program energy savings. Program impacts are estimated from the innovative and cost-effective mix of measures PG&E proposes to install through its 2009-2011 LIEE program portfolio.

IV. Cost-Effectiveness and Energy Savings

A. Benefit/Cost Ratio of Program

As the Commission directed, PG&E reviewed the cost-effectiveness of the LIEE program. The details of PG&E's cost-effectiveness analyses are appended as Attachments A-5 through A-7. PG&E performed the work according to the Commission's instructions, using the two cost tests previously adopted for the LIEE program, the Utility Cost Test (UCT) and the Modified Participant Cost Test (PC_m), and identifying the benefit/cost ratio for each measure/program. In addition, PG&E performed the Total Resource Cost (TRC) test, as directed in the Assigned Commissioner's Ruling Providing Guidance for Low-Income Energy Efficiency 2009-2011

Budget Applications, dated April 1, 2008, and includes them for information purposes.

LIEE Cost-Effectiveness Tests: Background and Methodology

In 2001, the Commission ordered the utilities to develop a cost benefit test that included non-energy benefits to assess LIEE program cost effectiveness, both for the overall program and for the individual low-income program measures. [4] LIEE cost effectiveness was assessed at both the LIEE *program* level, and at the *individual measure* level, using low income cost-effectiveness tests incorporating such non-energy benefits as comfort, health and safety as well as direct energy-related benefits. [5]

The cost-effectiveness approach adopted by the Commission in Decision 02-08-034 directed the application of two tests: a PC_m Test, which assesses measures from the perspective of LIEE participants; [6] and a UCT, which is calculated from the point of view of the utility. Both tests incorporate a set of non-energy benefits as well as direct energy-related benefits. These non-energy benefits capture a variety of effects

Final Report for LIEE Program and Measure Cost Effectiveness, submitted to the CPUC by the Cost Effectiveness Subcommittee of the Reporting Requirements Manual (RRM) Working Group and the LIEE Standardization Project Team, March 28, 2002; The Joint Utilities Revised Results of Measure Cost Effectiveness, submitted to the CPUC by the LIEE Standardization Project Team, January 6, 2003; and LIEE Measure Cost Effectiveness Final Report, submitted to the CPUC by the LIEE Standardization Project Team, June 2, 2003.

The Low Income Public Purpose Test (LIPPT) model was created for the RRM Working Group (including representatives from PG&E, SCE, SDG&E, SCG, CPUC Energy Division, CPUC Office of Ratepayers Advocates, and the public) by TecMRKT Works, SERA Inc., and Megdal Associates in 2001. The cost-effectiveness methodology was later modified by the Cost Effectiveness Subcommittee of the RRM Working Group and the LIEE Standardization Team in 2002 to incorporate two separate tests, the Utility Cost Test and a modified Participant Test, both that incorporate non-energy benefits working in conjunction with Equipoise Consulting, Inc.

The Participant Test was modified to use utility LIEE program costs in order to create a benefit cost ratio, since low income customers do not incur out-of-pocket expenses to obtain LIEE measures. The CPUC Office of Rate Payer Advocates wanted to estimate and use for this test the opportunity costs incurred by low income customers in lieu of any out-of-pocket expenses incurred; however, the final Team decision was to base the benefit/cost ratio on known costs (in this case, the direct costs incurred by the utilities to install the measures), hence the Modified Participant Test.

such as changes in comfort and reduction in hardship, which are not captured by the energy savings estimates derived from load impact billing evaluations, and are ignored in more traditional cost-effectiveness approaches like the TRC Test. The comprehensive non-energy benefits developed for these modified tests were initially designed for use at the program level and were allocated to individual measures according to their energy savings.

Cost-Effectiveness Testing for the 2009-2011 LIEE Program

For the 2009-2011 program cycle, the Commission instructed the utilities to provide program level and measure level benefit cost ratios using the UCT, the PC_m, and the TRC Tests. [7] Because the measure level benefit cost ratios produced for this application are to assess the cost effectiveness of the program as a whole, indirect costs were included in the analysis, unlike the previous analysis completed for the 2003 LIEE programs. In addition, because significant changes have been made since 2003 in the way avoided costs are included in energy efficiency analyses, the E3 Calculators for 2009-2011 Program Planning [8] were used in this analysis to measure avoided cost benefits. The steps involved in conducting the cost-effectiveness tests for the 2009-2011 programs are summarized as follows.

The PC_m Test was conducted using the methodology approved by the Commission for the PY2003 evaluation. The previous model was updated with the proposed measure installation quantities, proposed program costs, and updated energy savings impacts. [9] The benefit cost ratio for the PC_m Test consists of the Net Present Value (NPV) of energy savings and Non-Energy Benefits (NEB) for the participant in the

^[7] Assigned Commissioner's Ruling Providing Guidance for Low-Income Energy Efficiency 2009-2011 Budget Applications; Rulemaking 07-01-042, April 1, 2008.

^[8] E3 cost effectiveness calculators were downloaded from http://www.ethree.com.

^[9] Most of the impacts used in the analysis were taken from the 2005 Impact Evaluation conducted by West Hill Energy & Computing, Inc., and described later in this testimony. Where impacts were not provided in this study, they were taken from the Database for Energy Efficiency Resources (DEER) or workpapers.

numerator, and the cost of the program (both measure installation and indirect costs) in the denominator. For measure level benefit cost ratios, the administration costs were allocated based on the energy savings of the measure.

The UCT was conducted in two stages. First, the NEBs model used in the PY2003 evaluation was used to calculate program level NEBs, similar to the analysis for the PC_m but with utility-specific NEBs specified rather than participant-specific NEBs. Second, the E3 Calculators were used to derive the avoided cost benefits. The Calculator was populated with the proposed measure installation quantities, proposed program costs, and the energy savings impacts described above for the PC_m. The benefit/cost ratio for the UCT test consists of the NPV of avoided cost savings for the utility plus the utility NEBs in the numerator, and the cost of the program (both measure installation and indirect costs) in the denominator. For measure level benefit/cost ratios, the administration costs were allocated based on the energy savings of the measure.

The TRC test was conducted using the E3 Calculators for 2009 to 2011 LIEE programs. The Calculator provides program level results and measure-specific results with administration costs allocated based on the energy savings of the measure. The TRC test does not include NEBs, so in this respect it is not comparable to the results of the PC_m Test and the UCT.

B. Impact Evaluations

An impact evaluation of the PY2005 LIEE program (2005 LIEE Impact Evaluation) was completed by a study team led by West Hill Energy & Computing, Inc. The final report was filed on December 19, 2007 and savings factors from this study have been used in the cost-effectiveness analyses and to estimate potential savings for the 2009-2011 LIEE program.

Background

Previous impact evaluations were conducted for program years 1998, 2000, 2001 and 2002. Decision 03-10-041 specified that impact evaluations should take place every two years. However, the LIEE impact evaluation for PY2002 recommended modifications to the data

collection for improving future impact evaluations, and given the lead time required to make these changes, the impact evaluation originally to be conducted for PY2004 was postponed until PY2005.

The previous four LIEE evaluations were based on billing analyses, a decision that was largely dictated by the availability of data, time frame and budget. However, there were ongoing issues with lack of critical data at the program level and also concerns about the influence of external, non-program influences. The period of 2000-2003 encompassed the 2001 California Energy Crisis and was generally a period of volatility that affected energy prices and consumption. These conditions contributed to variations in program savings from year to year and concerns about the reliability and consistency of the savings.

2005 LIEE Impact Evaluation

The study was designed to estimate first year gas and electric energy savings at the program level and by measure and by housing type (multifamily, single family and mobile homes). Coincident peak demand reductions were also estimated. Table IV-1 shows the PY2005 impact results.

The primary method for estimating program savings was a statistical analysis of monthly bills for both participants and non-participants.

Additional surveys provided sufficient information to calculate alternative estimates of savings for some measures.

The study was conducted in three phases. Phase I took place in 2005, during LIEE program delivery. Data collection and databases were improved, evaluators met with program staff and went on ride-alongs, and the flow rates of showerheads replaced from LIEE homes were tested. During Phase II, on site surveys of PY2005 participants were conducted. Phase III components included: billing analysis (pooled, cross-sectional time series analysis), integration of results, and preparation of the report.

The 2005 LIEE Impact Evaluation identified several characteristics of the LIEE population that helped inform the development of PG&E's 2009-2011 program. The study found that LIEE participants use less electricity and gas than the average residential customer and have less opportunity for electric savings due to the lower penetration of electric

space and water heating and cooling equipment. The study also found that the potential for heating-related savings is low in many LIEE homes. About a third of the on-site survey respondents reported using their heating systems 30 days or less a year across the four climate zones represented in the sample. Another 13 percent of participants have no heating system or a non-working system, although the majority of these homes are located along California's southern coast outside of PG&E's service area.

Impact Results

TABLE IV-1
PACIFIC GAS AND ELECTRIC COMPANY
PY2005 TOTAL PROGRAM SAVINGS

Line No.		No. of Participants	Annual MWh	Coincident Peak (KW)	Annual Therms
1	PG&E	61,519	24,678	4,588	1,029,125
2	SCE	41,397	18,001	2,920	
3	SDG&E	13,737	4,640	800	154,498
4	SoCalGas	41,535			711,768
5	Totals	158,188	47,319	8,309	1,895,391

^{*} West Hill Energy & Computing, Inc., Impact Evaluation of the PY2005 LIEE Program. December 19, 2007.

Measures contribute to total program savings according to two factors: the magnitude of the per home savings and the number of homes receiving the measure. For example, the per home savings for lighting measures (CFL lamps and fixtures) are relatively small (79 kilowatt-hours (kWh)), but these measures are installed in almost all homes and in total account for about 16 percent of the total program savings. Tables IV-2 and IV-3 provide both the per home and total program savings by measure group, with the measure groups ranked according to the savings per home.

All the measures providing the highest savings continue to be offered to LIEE customers in PG&E's 2009-2011 program. This helps PG&E customers save energy and contributes to bill savings.

TABLE IV-2 PACIFIC GAS AND ELECTRIC COMPANY PY2005 ELECTRIC SAVINGS BY MEASURE GROUP

Line No.		No. of Households	Savings Per Home (kWh/yr)	Program Savings (MWh/yr)	% of Program Savings
1	Refrigerators	48,184	759	36,593	77.7%
2	Attic Insulation – Heating	175	246	43	0.1%
3	Hot Water Conservation Package(a)	4,061	240	976	2.1%
4	Cooling Measures(b)	5,249	172	903	1.9%
5	Air Sealing/Envelope	7,506	133	997	2.1%
6	Lighting	95,391	79	7,558	16.0%
7	Attic Insulation – Cooling	1,047	23	24	0.1%
8	Program Totals	111,892	421	47,094	

⁽a) The hot water conservation package includes low flow showerhead(s) and aerator(s), tank wraps and pipe insulation. The actual set of measures installed in each home varies according to the needs of each participant. Showerheads and aerators are the most commonly installed measures.

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6 7 Efficient refrigerators are the largest contributor to the total electric savings. Almost 80 percent of the electrical energy savings come from refrigerator replacements. On average, each participating household saved 423 kWh and 18 therms per year, and reduced their kilowatt (kW) demand by 0.074. Per household energy savings have risen steadily from 2000 through 2005 due to the increasing installation rates of efficient refrigerators.

⁽b) The cooling measures include the installation of evaporative coolers and replacement room air conditioners (AC). Evaporative coolers were installed much more frequently than room AC s.

TABLE IV-3 PACIFIC GAS AND ELECTRIC COMPANY PY2005 GAS SAVINGS BY MEASURE GROUP

Line No.		No. of Households	Savings Per Home (Therms/yr)	Program Savings (Therms/yr)	% of Program Savings
1	Attic Insulation	4,990	61.5	306,904	14%
2	Hot Water Repair/Replace	2,327	11.7	27,226	1%
3	Air Sealing/Envelope	84,531	11.2	950,940	45%
4	Heating System Repair/Replace	8,351	8.6	71,515	3%
5	Hot Water Conservation Package(1)	92,763	8.2	760,657	36%
6	Program Totals	107,677	19.7	2,117,242	

¹ The hot water conservation package includes low flow showerhead(s) and aerator(s), tank wraps and pipe insulation. The actual set of measures installed in each home varies according to the needs of each participant. Showerheads and aerators are the most commonly installed measures.

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The 2005 LIEE Impact Evaluation made several suggestions for the LIEE program. These included:

- Focus energy education on actions with higher savings and lower acceptance, such as drawing shades to reduce cooling;
- Improve the quality of the CFL lamps and ensuring their installation to raise retention rates from the 65 percent found in the on-site survey;
- Provide additional instruction on the appropriate use of evaporative coolers and air conditioning systems;
- Review change in refrigerator replacement protocols;
- Focus on non-energy benefits (e.g., improvements in health and safety) in the next evaluation; and
- Consider adding efficient clothes washers to the program and how to claim savings for reduced water pumping from low-flow devices and other water-savings measures.

PG&E has considered these recommendations and incorporated them in its 2009-2011 program design.

V. Program Design

This section describes PG&E's 2009-2011 LIEE program design, including how it fits into the Strategic Plan.

A. Section Overview

In Decision 07-12-051, the Commission expressed its desire that the LIEE program balance: (1) California's need for energy efficiency; (2) all LIEE customers' needs for all cost-effective assistance; (3) continuing hardship assistance for those in particularly difficult circumstances; and (4) managing the cost burdens to customers outside the LIEE programs. PG&E supports these goals of providing cost-effective energy savings to all LIEE customers while retaining the ability to provide other social benefits such as health, safety and comfort to customers with the deepest needs. In order to achieve this goal, PG&E has designed an LIEE program that combines highly cost-effective energy efficiency measures with less cost-effective measures that nevertheless provide important, yet hard-to-quantify non-energy benefits.

Focusing on the most cost-effective measures first will help to reduce the bills of more LIEE customers while providing an energy resource for all customers. Today, approximately 4 percent of eligible low-income customers receive energy efficiency assistance each year. By contrast, PG&E's proposed 2009-2011 program will provide energy efficiency assistance to 25 percent of PG&E's estimated eligible low-income customers by 2012 at a reasonable cost to the ratepayers, who fund the program.

While PG&E would like to extend all of the measures provided today to all qualified LIEE customers, the costs of doing so would place too high a burden on other customers, particularly those who just miss the LIEE income cutoff themselves. PG&E spent the last several months assessing measures, services and program delivery options to develop a program that provides cost-effective energy savings as well as increased comfort, health and safety to more low-income customers.

PG&E participated in multiple workshops and public meetings, convened focused discussion groups, and listened to other parties'

comments and feed back provided at meetings and in many one-on-one 1 2 conversations. Meetings included: PG&E LIEE program staff met with Energy Division (ED) and 3 Commission staff to discuss its 2009-2011 LIEE program plans on 4 5 February 22, 2008. 6 PG&E presented draft ideas to the public at a public input workshop, and asked for input at its regular LIEE contractor meetings on 7 March 13, 2008. 8 The focus of the quarterly public Low Income Program meeting held 9 by the California IOUs on February 20, 2008 was Strategic Planning 10 and the 2009-2011 Low Income Applications, and presentations were 11 made to the Low Income Oversight Board (LIOB) on March 19, 2008. 12 PG&E heard and considered all the ideas discussed at all of these 13 meetings, and revised and incorporated many of these suggestions into 14 the final 2009-2011 LIEE program proposal. A list of meetings, 15 participants, notes and presentation is included in Appendix E. 16 PG&E's re-imagined LIEE program targets customers based on 17 customer need indicators such as climate zones, geography, energy use, 18 demographics, housing type, and family size, and incorporates: 19 Focus on energy efficiency; 20 21 Increasing cost effectiveness; Comfort, health and safety; 22 23 Piloting potential program elements and approaches, including: new 24 measures, outreach channels, leveraging opportunities, and delivery mechanisms; 25 Integration with other low income and energy efficiency programs; 26 and 27 Flexibility and efficiency. 28 PG&E is proposing a targeted approach based on climate zones and 29 customer energy use because it fulfills the energy and equity objectives of 30 the decision. 31

B. Program Delivery

PG&E's 2009-2011 LIEE program will provide feasible, cost-effective energy efficiency measures and services to 25 percent of PG&E's estimated eligible low-income customers by 2012. As described previously, PG&E ran the PC_m, UCT and TRC Tests to determine cost effectiveness of the program and its measures. Because so few measures are truly cost effective to offer in the LIEE program, PG&E determined to offer those measures that are *most* cost effective to all qualifying customers for whom they are feasible.

Additionally, some less cost-effective measures providing high energy savings are also offered to customers based on their higher energy use. Other factors such as climate zone and housing type will still determine whether a particular measure is feasible to install. Thus, less cost-effective measures are available to customers based on a combination of factors, including use (and all that determines use, including household size, consumption behavior, and appliances owned), climate zone, and housing type. The only new variable is energy use, however, that is largely determined by other factors such as weather and housing type that have always been regulated by the LIEE program.

PG&E decided to offer some less cost-effective measures based on a customer's electric and/or gas use because customers with the highest energy use also offer the greatest opportunity to save energy. This ultimately helps both the affected customer, who save money on their bill, and all California ratepayers, who benefit as decreases in energy use strengthen the State's energy resources and decrease GHG emissions.

PG&E will offer the LIEE program through a multilayered approach that considers energy use, climate zone and housing type. In addition to the LIEE program, PG&E will offer several pilots that are described in more detail in Section IV.G.

PG&E's electric customers will be divided into low, medium and high tiers, based on their electric use at Tiers 1-2 (Low Electric Use below 130 percent of baseline), Tier 3 (Medium Electric Use from 131 percent to 200 percent of baseline) and Tiers 4-5 (High Electric Use above 200 percent of baseline). A customer will be considered at the highest

tier use they registered during at least two months over the previous 12-month period. PG&E chose to use a 2-month tier trigger rather than a 1-month trigger to help filter out a-typical usage patterns caused by unusual weather spikes, temporary home visitors, or other outlier events that are not indicators of normal household energy usage.

In order to accurately assess home energy use, a customer must have a minimum 6-month billing history to be eligible to participate in the program. Customers with less than a 6-month history will be re-evaluated after they have sufficient billing history.

Table V-1 shows the percentage of 2007 CARE customers at each electric Tier, based on a two month minimum trigger over the previous 12-month usage.

TABLE V-1
PACIFIC GAS AND ELECTRIC COMPANY
ELECTRIC TIER LEVELS FOR ALL CARE CUSTOMERS
(FEBRUARY 2008)

Line No.	Tier Level	% CARE Customers	
1	Tier 5	8.26%	27.69%
2	Tier 4	19.43%	27.0976
3	Tier 3	27.47%	27.47%
4	Tier 2	14.89%	44.84%
5	Tier 1	29.95%	44.04%

PG&E also tiered gas usage and divided gas customers into Tier 1 below-baseline low usage customers, and Tier 2 above-baseline high usage customers. PG&E used the same 2-month trigger described above for electric tiering. Table V-2 shows the percentage of 2007 CARE customers below and above baseline, based on a 2-month minimum trigger over the previous 12-month usage.

TABLE V-2
PACIFIC GAS AND ELECTRIC COMPANY
GAS TIER LEVELS FOR ALL CARE CUSTOMERS
(FEBRUARY 2008)

Line No.	Tier Level	% CARE Customers
1	Tier 1	22.67%
2	Tier 2	77.33%

Because gas usage is not predicated by electric usage, customers who receive both gas and electric commodities from PG&E will be assessed for each commodity based on their separate feasibility criteria. However, the actual in-home assessment will be performed at the same time by the same person. LIEE measures available to customers at each gas and electric level are shown in Tables V-3 and V-4 below.

TABLE V-3 PACIFIC GAS AND ELECTRIC COMPANY LIEE MEASURES AVAILABLE TO CUSTOMERS BASED ON THEIR ELECTRIC USE

PG&E Electric Customer						
Measure	Low User	Medium User	High User			
Energy Education	•	•	•			
Screw in CFL	•	•	•			
Interior Hardwired Light	•	•	•			
Occupancy Sensor	•	•	•			
Refrigerator	•	•	•			
Torchiere	•	•	•			
Evaporative Cooler	0	0	0			
Window/Wall AC	0	0	0			
Exterior Hardwired Light	0	0	0			
Attic Insulation ¹	0	0	•			
AC Tune-Up	0	0	0			
Door Weather-stripping ²	0	0	•			
Caulking ²	0	0	•			
Attic Access Weather-stripping ²	0	0	•			
Minor Home Repairs ²	0	0	•			

- Available to all qualifying customers.
- May be available to qualifying customers based on climate zone and/or housing type.
- O May be available to qualifying customers based on need.
- Attic Insulation Feasible if the customer cools the home with a Central Air Conditioner.
- Weatherization Feasible if the customer's home is All Electric.

TABLE V-4 PACIFIC GAS AND ELECTRIC COMPANY LIEE MEASURES AVAILABLE TO CUSTOMERS BASED ON THEIR GAS USE

PG&E Gas Customer					
Measure	Low User	High User			
Energy Education	•	•			
Water Heater Blanket	•	•			
Low Flow Showerhead	•	•			
Faucet Aerator	•	•			
Pipe Insulation	•	•			
Door Weather-Stripping	0	•			
Attic Access Weather-Stripping	0	•			
Attic Insulation	0	•			
Utility Gaskets	0	•			
Caulking	0	•			
Duct Test/Seal	0	•			
Minor Home Repair	0	•			
Furnace Repair/Replacement ¹	0	0			
Water Heater Repair/Replacement ¹	0	0			

- Available to all qualifying customers.
- May be available to qualifying customers based on climate zone and/or housing type.
- O May be available to qualifying customers based on need.
- Available to qualifying home owners.

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PG&E proposes to eliminate the current three-measure minimum criteria before installing energy efficiency measures in a home. Under this rule of the current program, a home must qualify to receive a minimum three measures (or a refrigerator) in order to participate in the LIEE Program. PG&E will assess all qualifying homes and install all measures for which they qualify under the program.

PG&E's LIEE program will be provided to customers by subcontractors reporting to a prime administrative contractor. The prime contractor will be hired through a new competitive bid to be let out in mid-2008, as further described in Section VIII.

Subcontractors will work in assigned geographic areas. As in prior programs, they will be responsible for achieving specific goals based on

the number of homes treated each year, determined by the number of estimated eligible customers in their assigned county. Although subcontractors will have the database of enrolled PG&E CARE customers in their area available to them (as they do in the current program), PG&E will provide more ME&O support, including collateral materials and customer segmentation information. PG&E is also working with its CARE outreach staff to provide more targeted LIEE outreach, generating more specific leads for contractors.

 PG&E will require that its subcontractors continue to offer the LIEE program to both higher and lower tier customers throughout its service area, and that low users not be passed over in favor of higher energy users. PG&E will implement tiers as well as county goals to help manage the LIEE program. Currently, PG&E's contractors have geographic goals, determined in proportion to estimated customer eligibility by county. Although contractors do not have rural/urban or renter/owner goals, all of these are tracked. For example, Table V-5 shows that PG&E low-income renters are treated in proportion to their existence in the population as reported in the KEMA Needs Assessment Report, which reported 44 percent of PG&E low-income customers were owners and 56 percent were renters.

TABLE V-5 PACIFIC GAS AND ELECTRIC COMPANY 2004-2006 LIEE HOMES TREATED BY HOUSING TYPE

		2004-2006 Total PG&E Homes Treated in LIEE		PG&E Low Income Population*
	Housing Type	#	%	%
	Single Family	59,429	78.0%	
	Multi-Family	1,717	2.3%	
	Mobile Home	15,054	19.8%	
Own	Total Owners	76,200	44.6%	44%
	Single Family	44,454	46.9%	
	Multi-Family	48,540	51.2%	
	Mobile Home	1,756	1.9%	
Rent	Total Renters	94,750	55.4%	56%
	Total Units Treated	170,950		

^{*} From RASS 2003/HENS 2004, reported in KEMA Low Income Needs Assessment Report, September 7, 2007.

PG&E will continue to monitor participation in key segments of the low-income population, and is proposing a Joint Utility study to identify and segment low-income customers most likely and willing to participate in LIEE. PG&E will use this data to set realistic goals in low-income population segments in future program years.

Bulk Purchasing

 PG&E already uses its considerable purchasing power to bulk purchase and negotiate lower prices for many measures, including energy efficient refrigerators, evaporative coolers and room air conditioners. PG&E will continue to use bulk purchase agreements and other methods with suppliers to bring EE measure costs down in the LIEE program. These costs are passed on to contractors, and have been offered to LIHEAP agencies as well. PG&E is working with its EE program and with the other utilities to explore the feasibility of statewide purchasing of some measures to find even greater discounts. Potential challenges to be investigated include warehousing and transportation.

1. Program Delivery by Density/Segments

PG&E is working to better segment its estimated eligible low-income population based on such useful characteristics as climate zones, geographic areas, language, and housing type. By better understanding these characteristics of the local population, PG&E will be able to target and penetrate customers segments with more accurate messages. As knowledge regarding diverse population segments becomes more accurate, PG&E will consider creating more segmented goals within counties for key (or underserved) population segments as warranted.

In addition to the LIEE program, PG&E is addressing specific community needs through creation of more community LIEE projects. These are described in more detail under the Pilot Section V.G. The purpose of these projects is to take advantage of existing community infrastructures to better serve hard to reach local communities. PG&E is excited about the projects proposed in this application, and anticipates expanding these community projects to more local communities as another source of providing LIEE services to its customers.

2. Increased Coordination Between Utilities

PG&E program staff meets regularly with other utility LIEE program staff to share successful practices and discuss program operations.

PG&E is working with the other utilities to increase bulk purchasing opportunities, which should contribute some cost savings due to increasing order sizes. However, there could also be unknown cost increases due to storage and transportation issues involved if central distribution is required to get product to LIEE program installers located throughout the state.

Other coordination efforts include data sharing and referrals between the utilities. LIEE customers referred from one utility to another do not have to be income verified again. However, other types of coordination between utilities could actually increase costs in terms of increased database management and record-keeping

criteria. Utilities are exploring new segmentation criteria utilities for targeting willing customers. These may also increase costs initially while utilities enhance existing database structures to record and track them.

3. LIEE Installation Standards and Policy and Procedures Manuals

PG&E is requesting \$250,000 over 2009-2011 to update the statewide LIEE Installation Standards (LIS) Manual and the Policy and Procedures (P&P) Manual. The current manuals are out-dated. PG&E will either work with the other investor owned utilities to update the manuals statewide, or separately to update them for PG&E only. PG&E will present them publicly and address any public comments before applying them to the LIEE program.

Previously, the Joint Utility LIEE Standardization Project Team created and updated the standardized Weatherization Installation Standards (WIS) Manual and the P&P Manual for the Statewide LIEE program. Decision 05-12-026, Ordering Paragraph (OP) 8 required that the LIEE Standardization Team not undertake any new activities unless directed by the Assigned Commissioner. In 2007, PG&E, SCE, SDG&E and SoCalGas, revised the P&P Manuals to accommodate the LIEE program changes authorized by the Commission for program years 2006, 2007 and 2008.

The proposed P&P Manual revisions were discussed openly at public meetings held by the joint IOUs and distributed for review and comment to the service list in Rulemaking 07-01-042 and to the IOUs contractors and agency contacts. The proposed revisions to the P&P Manual were not submitted to the Commission for approval at that time, however SDG&E plans to file the revised P&P Manual on behalf of all of the joint IOUs in the third quarter 2008 to seek approval for the program changes authorized in 2006, 2007 and 2008 LIEE program cycle. As a result, PG&E anticipates that a supplemental filing may also be required to accommodate the program changes proposed in the IOUs' 2009-2011 LIEE program applications.

Installation codes and standards change, and the LIS Manual should be updated to reflect these revised installation standards on a

regular basis. Additionally, standards must be added for any new measures included in the program. Ideally, PG&E believes that the LIEE program should offer consistent statewide installation standards, however, if no provision is made for the utilities to work together to maintain consistent standards and practices, PG&E will update its own manual so that all PG&E LIEE work is performed in compliance with State code.

Until directed otherwise, PG&E will comply with all current Commission decisions relative to the current LIEE Installation Standards and P&P Manuals. Additionally, the four IOUs will continue to work together with other interested parties to address program issues, including conducting workshops to obtain public input. The utilities also will work with the Energy Division staff to determine where Commission review and approval is necessary for any program changes related to matters covered in the Commission directives. This will allow necessary program changes to be addressed between program application filings.

4. NGAT Issues

In 1998, the Commission directed that low-income program funds were not to be used to perform LIEE-related Combustion Appliance Safety (CAS) testing, now known as NGAT. [10] This direction was based on the Commission's belief that "carbon monoxide testing conducted under the LIEE program is part of the "routine" service to ratepayers and is already authorized in rates."

PG&E requests that LIEE NGAT be funded through the LIEE program rather than the GRC, as the NGAT procedures adopted by the Commission are specific to LIEE. The complete NGAT procedure conducted under the LIEE program is not part of PG&E's routine Combustion Appliance Safety (CAS) testing service to non-LIEE customers.

Funding for NGAT/CAS testing for the LIEE program is currently provided in the GRC at \$2.84 million per year. If PG&E is given

^[10] See D.98-06-063 (OP 7) and D.00-07-020 at p. 108.

permission to fund NGAT out of the LIEE program, PG&E will reduce its revenue requirement by the amount currently in rates by proposing the reduction in PG&E's next AGT filing, to be effective January 1, 2009. This will ensure that the LIEE NGAT funding occurs in only one place so that no double recovery will occur.

Since 2001, the Commission has adopted policies for LIEE-related CAS testing that have significantly increased the number and types of testing required. On March 15, 2001, Decision 01-03-028 adopted a statewide minimum CAS testing standard for use by all utilities beginning in 2002, which required that CAS testing be completed for all LIEE homes that had gas appliances. The minimum testing requirements included, among other things, room ambient CAS testing and appliance ambient tests.

On December 11, 2001, Decision 01-12-020 adopted more detailed protocols for LIEE-related CAS testing. The Commission also directed that the costs of CAS testing be reported net of the costs associated with any other LIEE program activities taking place in conjunction with CAS test visits to customers' homes.

On November 11, 2003, Decision 03-11-020 required a significant increase in CAS testing activities beginning in 2004. LIEE CAS testing (now called NGAT) would include testing all gas appliances in weatherized homes except clothes dryers, with ambient tests conducted with all the appliances off, then with all of them on. Appliances that failed the initial tests could be subject to flue testing.

As a result of the requirements in these decisions, LIEE-related NGAT have become more complex and require more time to complete than in the past. NGAT is specifically designed to address the needs of low-income households that receive infiltration measures through the LIEE program. These circumstances differ from situations where other non-LIEE customers are provided routine gas safety services. PG&E believes that NGAT should be funded through the public purpose program along with all other LIEE program costs, since the tests have become an integral element of the LIEE program

and are regulated along with other LIEE program policies and procedures.

In addition, the amount of funds required for NGAT is directly related to the number of homes that receive infiltration measures under the LIEE program. This proceeding, not the GRC, is the appropriate forum to determine the appropriate funding for NGAT. The addition of NGAT funding into the LIEE program is more critical now that the LIEE program is ramping up to meet the Decision 07-12-051 programmatic initiative. As a direct function of the LIEE program, NGAT funding should be linked to LIEE rather than the GRC which occurs on a different cycle. The amount of NGAT funding previously authorized under the GRC was based on lower LIEE program participation goals and is insufficient to meet the increased demands of the new LIEE program, which jeopardizes PG&E's ability to meet the programmatic initiative. PG&E will need additional funding of NGAT as outlined in Attachment A-1 to meet the increased number of tests required for the 2009-2011 LIEE program.

C. Portfolio Composition

PG&E's 2009-2011 LIEE program portfolio is also described in Section V.B. PG&E is offering the most cost-effective measures to customers based on climate zone, housing type and energy usage.

Cost-Effective Measures

Cost effectiveness is one of the greatest challenges for the LIEE program. Other energy efficiency, solar, and DR programs are partial payment programs where *the customer* pays the bulk of the purchase and installation costs. For example, residential EE programs offer incremental rebates to incent customers to purchase and install more energy efficient equipment than they would have chosen otherwise. The LIEE program was originally created as an equity program to provide low-income ratepayers who could not otherwise afford it the same opportunity to receive EE services. In the free, direct install LIEE program, *the program* pays the full amount of the purchase and installation costs, significantly increasing costs paid for energy savings. For example, a refrigerator rebate program may pay rebates totaling

\$50 or \$100 to customers, reaping generous energy savings, but the 1 LIEE program must pay \$750 to \$1,000 to purchase, ground, install and 2 recycle a refrigerator for the same energy savings. Thus measures that 3 are highly cost effective in rebate programs may have very low 4 5 cost/benefit ratios in a free direct install program. Only the following LIEE measures had a cost-effectiveness ratio greater than 1.0: 6 7 Microwaves: and Water Heating Conservation Measures (including water heater 8 blankets, faucet aerators, low flow showerheads, and pipe insulation). 9 The following measures had a cost-effectiveness ratio less 10 11 than 1.0 but greater than 0.50, and are included in PG&E's 2009-2011 12 LIEE program: CFLs; 13 Interior Hardwired Lights; 14 Occupancy Sensors; 15 Refrigerators; 16 Torchieres; 17 18 Duct Sealing; AC Tune-Up; 19 Attic Insulation: 20 Clothes Washers; and 21 Aggregate Air Sealing/Envelope Measures (door weather-stripping, 22 caulking, attic access weather-stripping, minor home repair, and utility 23 24 gaskets). By focusing on measures that have the highest cost-effectiveness 25 ratio, PG&E can deliver assistance to over 25 percent of the potential 26 27 LIEE customers (300,000) quickly and efficiently during the 2009-2011

ratepayers) to unreasonable heights.

period without increasing the LIEE budgets (and resulting burden to

28 29 Because only a few measures exceeded a ratio of "1.0" based on the cost-effectiveness calculations, the utilities developed a scale to determine which measures are the *most* cost effective. The utilities followed this same methodology to determine measure cost effectiveness in 2003 in *The Joint Utilities Revised Results of Measure*Cost-Effectiveness, submitted to the Commission by the Standardization Team on January 6, 2003, and the *Low Income Energy Efficiency*Program Measure Cost Effectiveness Study Final Report, which included measure assessment by climate zone and was submitted to the Commission by the Standardization Team on June 2, 2003. The utilities recommend that these most cost-effective measures be provided in the LIEE program. PG&E proposes to offer some additional measures that are in the "mid-range" of cost-effectiveness, and describes them and explains its reasons for including them in the "non-cost-effective measure" section below.

PG&E will also leverage its mainstream EE programs and bulk purchase items where possible to stretch LIEE dollars as much as possible to provide maximum service to low-income customers. PG&E believes that this three-part effort of: (1) providing all cost-effective measures to all LIEE customers; (2) capturing contracting efficiencies by clustering measures into a single-visit approach wherever possible; and (3) bulk purchasing items where possible, will achieve the Commission's goals of providing a reliable EE resource, while serving a much greater number of LIEE customers with measures and services that will help more people reduce the burden of their energy bills.

Even though the approach described above will spread LIEE dollars across the greatest number of people and achieve the "biggest bang for the buck," PG&E also supports the Commission's goal of not losing sight of the original LIEE objective of providing health, safety and comfort benefits to people who are in extremely difficult situations. As many parties have pointed out, the above approach will simply not be sufficient for some customers who are trading energy costs for essential services such as food and medicine. PG&E therefore will augment its cost-effective program with additional non-cost-effective measures to

provide further energy savings as well as the traditional health, safety and comfort benefits.

This will take two forms:

 First, less cost-effective measures will be offered to customers with higher energy use because their higher use will render the measures more cost-effective.

Because LIEE customers generally cannot afford to waste energy, PG&E believes that LIEE customers in the higher tiers are often in those tiers because they have more people living in the house. Therefore, more people will benefit from the addition of more measures in these tiers and higher energy bills—which are even more burdensome—will be reduced.

Second, additional heating and cooling measures such as
evaporative coolers and window/wall air conditioners, will be offered
in climate zones that have more extreme temperatures. This will help
protect people from the health hazards associated with being too hot
or too cold.

Other LIEE measures such as exterior hard-wired lighting also had a cost-effectiveness ratio less than 0.50, but were included in the LIEE Program because of the comfort, health and safety benefits they offer to customers.

New Measures

PG&E considered and assessed several new measures to include in the LIEE program. LIEE staff looked at all measures offered to residential customers under its EE programs, and through the Third-Party Contracts and Local Government Initiatives to see if any of these measures might be feasible and cost effective to offer in the LIEE program. Most residential measures currently offered under these programs were already offered through the LIEE program, or were determined to be non-cost effective options. PG&E's residential EE programs offer rebates to customers to purchase and install high efficiency measures. Because LIEE is a direct install program that covers 100 percent of the installed measure cost, very few measures are cost effective in the LIEE program,

and many measures that are staples of other EE program portfolios, are not offered to all qualifying customers through utility low-income programs.

The following measures either ranked well in cost-effectiveness tests or passed initial assessment criteria that deemed them practicable to test further as pilot measures. These new measures are included in the 2009-2011 program on a limited pilot or regular basis:

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- Lighting Occupancy Sensors;
- Clothes Washers (pilot); and
- Microwaves (pilot).

1. Assembly Bill 1109 (AB 1109)

Assembly Bill (AB) 1109 (AB 1109; Huffman: the California Lighting Efficiency and Toxics Reduction Act) was signed by the Governor on October 12, 2007. This law requires that general purpose lights meet specific standards for hazardous materials (particularly mercury) and that the California Integrated Waste Management Board consider methods for the safe disposal of general purpose lights. Additionally, the bill requires that the California Energy Commission (CEC) adopt regulations (in combination with other programs and activities affecting lighting use) that will reduce the average indoor residential lighting consumption by 50 percent and average indoor commercial and outdoor lighting levels by 25 percent relative to 2007 levels. These reduced lighting energy use reduction targets will have to be met by 2018. The Department of General Services and all other state agencies must cease purchasing general purpose lighting that does not meet the standards within two years of enactment of the standards.

In order to help meet the requirements of AB 1109, the CEC, through its 2008 Appliance Efficiency Rulemaking, is looking at early adoption of the Federal Energy Independence and Security Act of 2007 (EISA 2007) Tier I standards for general purpose lighting. The effective date would be January 1, 2011. The federal standards

require that bulbs use 25-30 percent less energy than today's incandescent bulbs by 2012-2014 and at least 70 percent less energy by 2020. The initial replacements can be CFLs and light-emitting diodes (LED), to the extent they are already on the market, and advanced incandescent lamps, which the major lamp manufacturers are introducing to the market now. CFLs and LEDs will also meet the 2020 targets. The federal standards will lead to the replacement of standard incandescent 100 watt bulbs on January 1, 2012; 75-watt bulbs on January 1, 2013; and 40- and 60-watt bulbs on January 1, 2014.

While it is unlikely that the CEC will implement a complete ban on incandescent general purpose bulbs at this time, a ban would, in effect, mandate fluorescent bulbs. The changes to CEC's 2008 Title 24 building standards, effective in mid-2009, will primarily impact new construction and retrofits in the near term (i.e., during the 2009-2011 program cycle). This state legislation may be preempted by federal legislation in 2012-2014.

The most compelling issue for LIEE programs is whether the LIEE program should be funding inexpensive EE measures that will become a consumer's only lighting choice once incandescent general purpose bulbs are banned. However, since AB 1109 will not completely ban the sale of incandescent bulbs during the 2009-2011 program period, PG&E believes that the LIEE program should continue to distribute CFLs at least through 2011. CFLs provide cost-effective energy savings, and as long as less expensive incandescent choices are widely available, these less energy efficient measures will continue to be purchased and used by low-income customers.

The new standards are unlikely to be in effect during the 2009-2011 program period. Customers with limited income during this period will purchase less expensive incandescent bulbs and pay higher operating costs. CFLs are among the most cost-effective energy measures and can provide immediate and measurable bill savings to customers who need it most. Increasing awareness of

CFLs in advance of the standards will increase customer awareness of available options and help ease the transition when incandescent bulbs begin to disappear from store shelves.

At some point, AB 1109 will allow customers to buy only CFLs in California. As the effects of this legislation become more widespread it will be even more important to provide CFL fixture assistance to LIEE customers, who will find it harder to perform the necessary rewiring than the average customer. At that point, PG&E will reassess the efficacy of LIEE CFL measures. One option would be to decrease the number of CFLs that are provided through the LIEE program and increase the number of CFL fixtures.

Additionally, while it presently is unclear whether the California Integrated Waste Management Board will adopt policies that promote the safe disposal of CFLs, PG&E believes that the LIEE customers should be educated in proper disposal of CFLs. Education on the proper disposal of CFLs will be included in PG&E's in-home energy education program and other CFL promotions. Any further direction on proper disposal resulting from this legislation will be incorporated.

2. 10-Year Go Back Rule

installations."

In order to provide services to the widest range of low-income households possible, the 2006 Low Income Energy Efficiency Policy and Procedures Manual (dated October 25, 2005) places certain restrictions on the participation of homes/customers that have previously been treated under the LIEE Program.

Decision 07-12-051 directs the utilities to "Eliminate or modify the 10-year 'go back' rule to permit installations of new measures and technologies in all households while avoiding duplicative

PG&E proposes to eliminate the 10-year go back rule. PG&E proposes to treat any qualifying home that has not been treated by either the LIEE program or LIHEAP program since 2002. When evaluating the 10-year rule and assessing the levels of service provided to customers over the past 10 years, the utilities decided that customers who had been served since the end of 2001, when

"Rapid Deployment" measures were included in the program, were customers who had received "all feasible measures" currently offered. These customers would receive very little—if any—additional benefit from LIEE. Only a few new measures have been introduced since 2002, and any higher energy-saving measures, such as air conditioning were implemented in the program as "go-back" measures. This is discussed in further detail in Section III.A, under the explanation regarding how the utilities plan to meet the 25 percent LIEE programmatic initiative.

The utilities have agreed upon the following modifications/exceptions to "Section 2.8 Previous Participation" of the 2006 LIEE Policy and Procedures Manual: New cost-effective measures or technologies that were not previously available in the LIEE program at the time the utility treated a home shall be made available for those qualifying customers. In the event a key program eligibility requirement now makes a customer eligible for measures previously not offered at the time the utility treated the home, the utility shall make available those cost-effective measures for qualified customers.

Note that in all cases, the household must continue to meet qualification requirements to be considered eligible to receive services not offered at the time of original enrollment.

PG&E also proposes to eliminate the three-measure minimum currently required for participation in the LIEE program. It is PG&E's belief that the comprehensive energy education and measure assessment conducted by its LIEE Energy Specialists when the home is enrolled in the LIEE program will ensure that the home receives all measures for which it qualifies to make it as energy efficient as practical given the building age, type and the customer's energy consumption patterns. It also will assist PG&E in working with the California Department of Community Services (CSD) and the LIHEAP agencies to maximize leveraging opportunities.

3. PG&E Proposes a Continuation of the REACH (Relief for Energy Assistance Through Community Help) PLUS Program for the First Time in This LIEE Proceeding

In this section, PG&E seeks \$10 million per year for the 2009-2011 cycle for the continuation of the REACH PLUS program. PG&E has had a REACH program available to low income customers experiencing extreme hardship since 1983. The REACH program is an energy assistance program which offers one-time cash grants to qualifying low-income customers who experience an unplanned or uncontrollable change in their ability to maintain their energy service. [11] To qualify for assistance, the applicant's income may not be more than 200 percent of the Federal Poverty Level (FPL), the same threshold as is established for the CARE and LIEE programs. Other general qualifications include a 48-hour shut-off notice and residence in non-subsidized housing.

This year-round program has generally been funded by PG&E customers' and employees' individual voluntary tax-deductible contributions. With the consent of each PG&E participating customer these contributions are normally pledged and made a component of the monthly PG&E bill.

REACH is administered by the Salvation Army and all administrative costs are covered by a charitable grant from PG&E's shareholders and by operating income from the Salvation Army. This approach ensures that 100 percent of customer donations go directly to providing energy assistance to qualifying customers in need.

The Salvation Army administers the program focusing on balancing the funds available with the number of customers who are requesting assistance. On an annual basis, customers are regularly turned away for lack of funds, particularly in the peak months of the late winter and late summer.

In the fall of 2006, PG&E filed a request to use \$5 million collected in the DRAM balancing account to provide a fund for

^[11] The program allows for one-time cash grants on an 18-month basis.

residential customers who might otherwise be unable to pay higher bills caused by increased AC use during the Heat Storm[12]. PG&E proposed that the funds generally be administered by the Salvation Army in a manner consistent with the existing REACH program. In approving PG&E's request, the Commission stated that the amount be "...increased from five million to ten million and remain available to customers throughout 2007."[13] The Commission also endorsed this program by mandating that SCE and Sempra Energy establish a similar program for their low income customers. The Utility Reform Network (TURN)[14] and DRA both supported this program, which became known as REACH PLUS.

The qualification criteria under REACH PLUS were broadened to include customers living in subsidized housing and the maximum grant was increased from \$300 to \$500. During the nearly 18 months of REACH PLUS, the program has helped approximately 40,000 low-income customers avoid shut off by providing an average payment amount of almost \$260. Under the REACH PLUS program PG&E shareholders have continued to fund the administrative costs incurred by the Salvation Army and other ancillary costs.

The REACH PLUS program has been highly successful and the \$10 million provided in August of 2006 has been exhausted. Current emergency assistance needs are being met through the flow of charitable funds into the traditional REACH program, which has only twenty percent of the amount of funds available through REACH PLUS. In order to manage the reduction in available funds, more restrictive REACH eligibility criteria have been reimplemented. As a result, there is a substantial increase in the number of low income

^[12] Advice Letter 2885-E, filed August 16,2006

^[13] Resolution E-4019, p.1

[&]quot;TURN applauds PG&E for its willingness to creatively approach the problem of how to increase the assistance available for customers at risk of service termination... The \$5 million emergency assistance fund may be what makes all the difference for a number of PG&E's most financially vulnerable customers..." Letter dated August 18, 2006 entitled "Response of TURN in Support of Advice Letter 2885-E.

customers turned away from REACH assistance. This continued demand for emergency energy assistance is occurring despite increases in participation in CARE and LIEE.

Funding

The objectives of the Public Purpose Program component on the utility bill are well served through the funding of the REACH PLUS Program for 2009-2011. PG&E's Low-Income Energy Efficiency program has had a long history of assisting customers in need through weatherization and related services as well as through its sister CARE Program. The \$10 million annual funding of REACH PLUS will support the health, comfort and safety of PG&E's customers and will be a critical component of the integrated portfolio of services provided to low income customers (see leveraging section above) in the 2009-2011 timeframe.

D. Marketing, Education and Outreach

Currently, PG&E marketing and outreach is performed by LIEE implementation subcontractors. These contractors are responsible for enrolling LIEE participants to meet their contract goals. PG&E provides them with a database containing current CARE customers in their contract area for them to outreach the program to. This database is updated on a weekly basis. In addition, the program database notes which customers have participated previously and are thus ineligible to receive LIEE services.

PG&E contractors currently use many strategies to enroll LIEE customers, including: canvassing neighborhoods, targeted direct mail, outbound calls, advertising in local venues, speaking to local groups, and outreaching at community events. Customers who call into PG&E's customer service are referred to the LIEE program and assigned to the contractor in their area who sets up an appointment with them.

PG&E will help its contractors continue these successful marketing and outreach strategies. PG&E's most important strategy to enroll LIEE participants for 2009-2011 will be helping its contractors mine the CARE list for leads. PG&E's CARE rate discount program currently has a 73 percent penetration rate among eligible low-income customers. It also

makes sense to start with the CARE list because those customers are receiving a subsidized rate discount, and it will help fund the expansion of the CARE and LIEE programs to eliminate as much subsidy as possible for inefficient energy use through LIEE efficiency improvements.

Rather than duplicating effort and cost, PG&E's LIEE program team is integrating marketing and outreach with its highly successful CARE team's outreach. To increase participation in the LIEE program, PG&E will seek to leverage CARE and LIEE messaging strategies to reach the same targeted customer segment while incurring only incremental LIEE costs. For example, CARE outreach efforts reach customers through a variety of activities including its network of CARE Outreach Contractors (COCs), community outreach, direct mailings and bill inserts, participation in local community events, presentations, paid media (including advertising in local and in-language newspapers, television and radio), grassroots media, and partnerships with government agencies and faith-based organizations. CARE's outreach campaign also includes key media, charitable organizations and government agencies serving targeted counties and communities in multiple languages.

By working through the CARE outreach team, LIEE will also be able to take full advantage of CARE's successful low-income customer segmentation and targeted marketing strategies: CARE outreach targets seniors, disabled customers, families, ethnic populations, rural and urban customers, and other low-income PG&E customers.

During 2009-2011, PG&E will identify and target high energy-use CARE customers who may elect to participate in the LIEE program while building more general awareness about the program through advertising, direct mail, and other approaches. Increasing awareness will be particularly important in later years as PG&E's LIEE penetration increases and eligible customers may become incrementally harder to find and serve them.

PG&E is working together with the other IOUs, Energy Division, the LIOB, contractors, low-income community agencies and other interested parties to develop statewide marketing approaches and tagline for the

LIEE program. Each utility will be able to add the readily recognizable LIEE program tag line to its own LIEE program name.

During 2009-2011 PG&E will also work closely with PG&E communications and marketing teams working on other EE programs to promote all opportunities that may be advantageous and feasible to low-income customers. PG&E LIEE program management staff meet regularly with EE, DR, CSI, climate change and other program and marketing staff to integrate strategies and coordinate outreach efforts. PG&E LIEE staff is also exploring opportunities with other utilities and agencies (municipalities, water, local governments, and LIHEAP) and expanding grassroots outreach efforts with Community-Based Organizations (CBO) and other agencies.

1. Single Statewide Marketing Campaign

The Commission, in Decision 07-10-032^[15] directed that the CEESP, provide details about how education, marketing and outreach activities will be used to promote EE programs in an integrated and coordinated fashion, as set forth herein. The Commission also seeks to consider the development of a brand for California EE products and services.

The Commission expanded on this direction in Decision 07-12-051 for the LIEE program and directed the utilities develop a tagline that can be used with the existing program names currently used by the utilities. [16] The tagline was discussed and suggestions were offered at the LIEE Strategic Planning Workshops held January 8, 2008 and April 3, 2008. No consensus was reached at either of these meetings on a tagline for the program. The utilities have included exploring the use of a recognizable and trustworthy brand or tagline for LIEE in the CEESP.

Currently, low-income customers are made aware of the LIEE program through a wide range of methods including, but not limited

^[15] D.07-10-032, dated October 18, 2007, Conclusions of Law 13, 14, OP 8.

^[16] D.07-12-051, dated December 18, 2007, pp. 46-47, "The workshop(s) should develop a brand name for the LIEE program that all utilities will use as a tag line that each utility would add to its own LIEE program name."

to: door to door canvassing, telemarketing, radio, news print, customer referrals, internet and referrals from other low-income assistance programs.

The utilities have contracted with an advertising agency to test concepts in the respective service areas through focus groups, mall intercepts, and online communications, and expect to present a recommended program tagline to the Commission by July 14, 2008. Implementation of the new statewide program tagline will facilitate the integration and visibility of the LIEE program.

The new program tagline will be used in all customer communications, including advertising, collateral, and website. The tagline will help reach low-income customers with interest in lowering energy bills and increasing home comfort. The utilities will develop a program tagline with consideration on how it will translate into other languages.

As described above in Section V.D, PG&E believes that marketing expenses for the 2009-2011 program can be minimized by working closely with its CARE program outreach efforts. PG&E believes that a more aggressive outreach campaign may be necessary in the next phase of this LIEE programmatic initiative, beginning in 2012. PG&E will continue to work with the other utilities and interested parties, including Energy Division, DRA, the LIOB and others, to develop a statewide tagline for immediate use with its LIEE "Energy Partners" program name, and to develop marketing plans for a more aggressive statewide marketing campaign to promote greater program awareness and participation for future phases of the program.

2. ME&O by Population/Segments

PG&E will undertake several ME&O efforts in 2009-2011 that target specific populations, including disabled customers, seniors, and renters.

PG&E has proposed several projects that will help seniors and disabled customers. For example, PG&E proposes to work with Meals On Wheels to identify their homebound clients qualifying for

microwaves and LIEE services. In conjunction with SCE, PG&E is proposing a household segmentation and targeting study to help identify and outreach to potential LIEE customers, including seniors, disabled customers, and renters.

There is a public perception that renters are not being treated equitably in the LIEE program. As noted previously in Section V.B, this perception is not correct; PG&E low-income renters are currently treated by the LIEE program in proportion to their presence in PG&E's low-income population. PG&E will continue to monitor the participation rates of renters and owners in LIEE to ensure that this rate remains roughly proportional.

PG&E's 2009-2011 pilot programs will also target other at-risk populations. The Habitat for Humanity pilot targets very low-income families with children. The City of San Jose pilot targets hard-to-reach populations in areas undergoing complete revitalization who speak English, Spanish and Vietnamese. The City of San Joaquin (Fresno County) pilot targets rural Hispanic customers who have tended to resist traditional marketing. And finally, the Community Based Energy Education Workshops pilot targets rural populations currently un-served by the LIEE program. All of these pilots will provide valuable information on how to better target our low-income marketing to these populations.

(a) Section 8 Public Housing (Categorical Eligibility)

In Decision 07-12-051 the Commission directs utilities to "Propose a process for automatically qualifying all tenants of public housing and tenants of Section 8 housing improving information to public housing authorities." [17] The Commission found that "Customers who live in public housing have provided government officials with documentation of their low-income status," [18] and concluded that "The utilities should automatically qualify for CARE discounts those customers who live in public

^[17] D.07-12-051 OP 4 (p. 91).

^[18] D.07-12-051, Finding of Facts No. 24 (p.87).

housing because they have already demonstrated to public officials their low-income status."[19]

While supporting automatic qualification for public housing, the Commission agreed with concerns that some tenants of Section 8 housing may have incomes that substantially exceed the income levels that would qualify customers for LIEE programs. Therefore, the Commission encouraged utilities to better coordinate with public housing to maximize opportunities on their properties.[20]

The U.S. Department of Housing and Urban Development (HUD) administers Federal aid to local housing agencies that manage the housing for low-income residents which sets rent for housing at a level low-income residents can afford. There are two types of subsidies that are offered in California: Section 8 and Public Housing. The Section 8 voucher and certificate programs provide rental assistance outside of a public housing unit and are administered by public housing agencies.

Qualifications for the two types of programs are based on program policies set by HUD. Eligibility is based on household size and household income and must fall within guidelines set by HUD based on the federal Area Median Income (AMI) estimates of the county for each State. These guidelines are updated each fiscal year. Enrollment and benefits under Public Housing Agency (PHA) programs are based on income eligibility limits set at 30 percent (Extremely-Low), 50 percent (Very-Low) and 80 percent (Low) of the AMI.

In discussions with PHAs on implementing an automatic enrollment process through data sharing, client confidentiality has proven to be an insurmountable obstacle. PHAs are obligated to comply fully with all federal, state, and local laws, and specifically with rules and regulations governing confidentiality in housing.

^[19] D.07-12-051, Conclusion of Law No. 11 (p. 89).

^[20] D.07-12-051, Footnote 60 (p. 67).

PHAs may not disclose any applicant/resident information, directly or indirectly, that is of a personal, private, and confidential nature, to any person, or use such information in any way without the written consent of the tenant. Due to interpretations of the laws, PHAs are prohibited from sharing client data with utilities, and an automatic enrollment process through data sharing cannot be established and implemented at this time.

One alternative to automatic enrollment is to make PHA tenants categorically eligible to receive LIEE services, however, eligibility is proving difficult to establish. This is because three separate eligibility thresholds are used to establish PHA benefits (at 30 percent, 50 percent and 80 percent of AMI), and only two of these thresholds (30 percent and 50 percent) fall within LIEE guidelines. Thus, assigning categorical eligibility status to all PHA tenants cannot be accomplished without a segment of PHA tenants, who do not income qualify, receiving LIEE and CARE benefits.

In addition to tenants ineligible for CARE and LIEE at 80 percent AMI, a significant number of PG&E's Counties have income limits at 50 percent of AMI that exceed the LIEE qualifying income guidelines which are established at 200 percent of the FPL. PHA tenants qualifying at 50 percent AMI in 11 northern California counties are over the Commission's approved income guidelines and do not qualify for LIEE. [21] PHA tenants qualifying at 50 percent AMI in four of these counties (Marin, San Francisco, San Mateo, and Santa Clara) are *significantly* over qualified compared to the 200 percent FPL guidelines.

Assigning categorical eligibility to PHA tenants at 30 percent AMI was considered the most viable option, but PHA tenants rarely know (or understand) their eligibility based on PHA AMI

^[21] These Counties include: Alameda, Contra Costa, Marin, Napa, San Benito, San Francisco, San Mateo, Santa Clara, Santa Cruz, Solano, and Sonoma. Income levels in Marin, San Francisco, San Mateo and Santa Clara are significantly higher at 50 percent AMI than the 200 percent FPL guidelines that qualify customers to participate in the CARE and LIEE Programs.

guidelines. Since categorical eligibility relies on customer self-reporting, this prevents categorical eligibility from being a very useful option.

PG&E's CARE program is proposing to work with PHAs in PG&E's service area to become CARE Outreach Contractors, integrating the CARE application process with the PHA intake process. As tenants apply for PHA assistance, CARE applications will be processed ensuring that customers at the 30 percent AMI guidelines are enrolled and those at the 50 percent AMI that meet CARE guidelines are also enrolled. The integration of the CARE application into the PHA intake process will also prevent tenants whose incomes exceed CARE guidelines from receiving benefits.

Enrolling qualified public housing tenants in the LIEE program is also a high priority for PG&E. PG&E LIEE program staff will work with PHAs in its service area to integrate LIEE enrollment into the enrollment and intake process of the PHAs in their service area.

3. Workforce Education and Training

The longest continuously operated Energy Center of its kind in the U.S. is PG&E's Energy Training Center (ETC) in Stockton. Since 1978, the ETC has been a positive force in the development of education and training for thousands. For almost 30 years, the ETC has been a driver of EE education and installation. Since 1978, the ETC has trained over 61,949 students, including implementers of both PG&E's LIEE program and the State's LIHEAP program. In the last two years, ETC trained 1,790 students over 6,054 student days to perform energy assessments, educations, installations, and natural gas appliance tests for PG&E's LIEE program.

In 2009 through 2011, PG&E will continue to train all LIEE contractors and subcontractors at the ETC to deliver energy education, weatherization services and measure installation provided through the LIEE program. PG&E anticipates a significant increase in the number of LIEE implementers required to provide energy

efficiency services to 25 percent of the LIEE eligible homes in PG&E's service area over the next three years.

PG&E's LIEE implementation subcontractors hire most in-home workers from the communities in which they will be working. These LIEE field personnel bring their local, in-language knowledge to help recruit LIEE participants from the communities in which they live and work. PG&E's energy efficiency training provides them with skills and work experience that are transferable to other green jobs.

PG&E is also exploring new approaches for delivering training to some of its LIEE program implementers. For example the ETC, in support of the long term strategic planning goals, will explore and pilot on-line training for LIEE Weatherization Specialists or Energy Specialists. PG&E would then evaluate the benefits of decentralized training in reducing, where and when feasible, training time at the ETC. (See Appendix D, Attachment A-10.)

PG&E is working with SCE, SDG&E and SoCalGas to develop a low-income workforce education and training plan that will be attached to the CEESP to be submitted by the Joint Utilities on June 2, 2008.

E. Integration With Energy Efficiency and Other Programs

Within PG&E, we integrate and leverage resources in many directions. For example, PG&E will leverage the CARE customer list as an efficient way to reach customers during 2009-2011. At this point, CARE has identified far more than the 25 percent of customers needed to meet our targets during this time frame, so using the CARE list is highly efficient.

PG&E leveraged its EE programs to identify the four new measures it is adding and/or exploring in the new programs and pilots—occupancy sensors, torchieres, high-efficiency clothes washers, and microwaves. We will continue to monitor CEE measures to see if any should be included in LIEE.

PG&E will leverage within the demand response programs to provide SmartAC cycling education to LIEE customers in the hopes that more of them will sign up for DR programs. PG&E will leverage its existing

Stockton Energy Training Center to extend on-line training services to remote contractors. And, finally, we will leverage PG&E's SmartMeter™ program to provide energy education on how customers can save energy overall and potentially save even more by shifting their energy use "off-peak."

PG&E LIEE, EE, DR and solar program staff participate in regular meetings to discuss marketing and other program integration strategies. PG&E currently provides materials about all of its EE programs to customers at events, on customer bills and on its web site where customers can learn about all of the opportunities available to them. LIEE program staff has been working particularly closely with PG&E's Local Government Partnership teams to use these distribution channels to compliment rather than duplicate LIEE services, thus bringing more EE opportunities to more low-income customers.

EE residential program staff coordinates with LIEE programs by referring low-income customers to the LIEE program.

PG&E continues to increase outreach by coordinating activities and advertising with other PG&E EE and rate programs likely to reach low-income customers and service providers. PG&E's LIEE contractors are required to inform customers about other programs (such as CARE) that they may be eligible for and provide assistance to complete CARE applications.

PG&E employees regularly present information about the Company's low-income programs to the media and at community events throughout PG&E's service area. These presentations are used to educate customers about energy efficiency and inform them about assistance programs and opportunities available to them through PG&E. PG&E employees made presentations and media initiatives in 2007 about LIEE and CARE in multiple languages, including: English, Spanish, Cantonese, Mandarin and Vietnamese.

F. Leverage Available Resources

PG&E agrees with the parties who have pointed out that we can stretch program dollars further, and reach even more program participants by coordinating both inside and outside the utilities. The

parties provided many suggestions on how to better coordinate and leverage, and P&GE appreciates their thoughtfulness.

PG&E will coordinate and leverage its internal CARE, Customer Energy Efficiency, CSI, DR, and SmartMeter™ programs. Finally, PG&E is exploring ways to coordinate with other agencies and programs offering low-income services.

1. Coordination With Other Utility LIEE Programs

PG&E LIEE program managers meet frequently with IOUs to share successful program practices and discuss LIEE strategies, research and outreach. The utilities conduct joint evaluations and market research studies, with input from Energy Division.

Additionally, the IOUs jointly host quarterly public meetings on both the LIEE and the CARE programs to discuss LIEE issues and approaches with interested parties.

2. Coordination With Other Programs and Entities

PG&E leverages with other utilities, including the other energy IOUs that run LIEE programs, municipal utilities, small multi-jurisdictional utilities (SMJU), irrigation districts, and water utilities. PG&E low-income program staff meet regularly with other low-income councils in its service area. For example, PG&E LIEE and CARE program staff participate in a Sacramento coalition of low-income and senior service agencies, that includes the Sacramento Municipal Utility District (SMUD) low-income program staff.

PG&E will leverage and support Section 8 public housing by incorporating CARE and LIEE eligibility into the Section 8 housing application process. PG&E will leverage resources with LIHEAP by eliminating the minimum measure rule, supporting federal legislation, and continuing the refrigerator program.

In its proposed pilot programs, PG&E will leverage the Meals on Wheels contacts with shut-ins, seniors and disabled customers to determine who can best benefit from having a microwave oven.

PG&E is also leveraging Habitat for Humanities contacts to provide energy education, train contractors, and locate nearby customers

who may be eligible for CARE and LIEE. Finally, PG&E will leverage the contacts already established by the City of San Jose, the City of San Joaquin, the Glenn County Human Services Agency, the Redwood Community Action Agency, and the Amador-Tuolumne Community Action to connect with otherwise hard to reach low-income customers in those communities (particularly customers who are either rural or experience language barriers). As PG&E learns from its nine new pilots and four new studies, we will expand our leveraging based on the approaches that show the most promise.

(a) LIHEAP

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PG&E and the other IOUs have been meeting with representatives of the California Department of Community Services (CSD) which manages the LIHEAP contracts in California to discuss ways that we can leverage more successfully between the two low-income programs. PG&E will leverage resources with LIHEAP by eliminating the minimum measure rule, supporting federal legislation, and continuing the refrigerator program.

Under current discussion are strategies to change the LIEE and LIHEAP home weatherization minimum three-measure rules to qualify a home for treatment.

PG&E is willing to waive its minimum measure rules, which will allow homes referred from LIHEAP to receive any additional measures feasible under LIEE and is working with CSD so that this rule may be waived for LIHEAP agencies receiving referrals from PG&E.

PG&E is planning to continue its successful refrigerator leveraging program with LIHEAP providers. Under this program, interested LIHEAP agencies that are not LIEE contractors may contract with PG&E to provide refrigerators to eligible PG&E customers. By providing the refrigerator under LIEE funding, the LIHEAP agency can stretch its dollars to offer more services to more homes. PG&E will pay for these replacement refrigerators

and recycling at the same negotiated discount cost that it pays for refrigerators under the LIEE program.

(b) PG&E Community Alliance Strategies Project

 PG&E has been working with a team of low income community consultants to help gather input from low income community advocates that have not traditionally played an active role in PG&E's LIEE program planning process. The community alliance team has held several small focused group discussions throughout PG&E's service area since November regarding how the LIEE and CARE programs can better coordinate with local communities, and what types of collaboration and support they think would be most beneficial. Each group discussed not only what PG&E could do for them, but how they could help PG&E reach their low-income clients.

PG&E used these meetings not only to strengthen relationships with local communities, but also to get feedback on its 2009-2011 LIEE programs throughout the planning process. Through this Community Alliance team, PG&E will be conducting several more focus groups and focus discussions in 2008, targeting customers, LIHEAP providers and other community agencies. Input will be used to help PG&E continue to refine and adjust program processes to reduce barriers to increasing low-income customer participation.

(c) CEESP Resource List

PG&E, SCE, SDG&E and SoCalGas prepared a list of organizations and resources for low-income programs that is attached to the CEESP. PG&E plans to better coordinate and work with these organizations and resources in 2009-2011, and to continue to seek out new organizations and resources.

(d) Coordination with REACH PLUS

PG&E expects that there will be significant potential synergies which can occur with the inclusion of the LIEE and REACH PLUS programs under a single umbrella program. The LIEE services are of particular benefit and need for customers

that have experienced economic crisis leading to an imminent service termination. As a consequence, PG&E is taking steps to promote its LIEE program in all Salvation Army locations that administer the REACH PLUS program.

3. Coordination With CSI – Low-Income Program

PG&E is coordinating with CSI staff to fully incorporate the LIEE program into its low-income CSI offerings. All LIEE qualified CSI customers will be fast-tracked through the LIEE program to receive all feasible LIEE measures and services before solar panels are installed. This ensures that a home is receiving the maximum benefit from their solar installation. As part of the low income multifamily solar program, PG&E LIEE staff will also develop and offer pre-installation audits for qualifying affordable housing, including for building common areas.

4. Coordination With CARE

For 2009-2011, PG&E will continue to leverage with its successful CARE program. As described in previous sections, PG&E's primary marketing strategy during the 2009-2011 period is to leverage CARE outreach and marketing. PG&E will also integrate other program functions and activities such as income verification to increase program cost efficiencies between both programs.

This is an excellent head-start for the LIEE programs because PG&E already knows who these customers are. CARE customers are receiving a subsidized rate reduction, so installation of LIEE measures in their homes is even more cost effective because it reduces the degree to which other customers have to pay for low income rate reductions on inefficient energy use.

The CARE program is reaching 1.13 million low-income customers. This is far greater than the 25 percent of eligible low-income customers PG&E is required to reach through the LIEE program during 2009-2011, thus PG&E has already identified the customers we need to reach for the next three years. By 2012, CARE will have identified additional eligible customers to target, so the synergy between the two programs is appropriate and timely.

CARE can also leverage the LIEE programs by using the LIEE 1 2 contractors in the field to help with field verification of income that is required to verify that income-qualified customers are receiving the 3 benefits of both the CARE and LIEE programs. Thus, PG&E will 4 5 leverage both programs to do what they do best: CARE with marketing and outreach; and 6 LIEE with field contacts, measure installation, and income 7 verification. 8 G. Pilots and Projects 9

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A very important part of PG&E's application are its extensive pilot projects. As the Commission noted in Decision 07-12-051, PG&E is to provide low-income customers with all the services we already know how to perform today as well as to explore and field test new ways of serving them in the future. To that end, PG&E proposes nine innovative pilot programs that cover every aspect of the Commission's vision, including:

- New Measures: Testing the feasibility and cost-effectiveness of providing new measures, including ones that address water and energy efficiency as well as SmartMeter™ and demand response technologies;
- New Partnerships: Partnering with new entities, ranging from local neighborhood groups to widely recognized national organizations;
- New "Green" Job Training: Finding new ways to identify and train local community members as EE contractors;
- New Leveraging Opportunities: Leveraging existing community contacts to find and serve traditionally hard-to-reach low and very-low income customers, including shut-ins, seniors and disabled, near homeless families with children, neighborhoods in so much need that they require complete revitalization, rural and/or remote populations, and non-English speaking families;
- New Education Strategies: Developing, refining, and expanding our education methods, both for customers and contractors, including

- on-line training materials for contractors and targeted demand response and SmartMeter™ education for low-income customers;
 - New Outreach Strategies: Finding new ways to educate hard-to-reach rural customers as well as seek their input for overall energy education program improvements;
 - New Combinations of Public/Private Services: Leveraging and complimenting local government services to provide a comprehensive and seamless approach to community well being that addresses physical safety, economic security, empowerment and environmental sustainability.

PG&E is confident that these nine pilots will set the stage for an ever-expanding portfolio of low-income services for the future. Brief summaries of each pilot are provided below, and details are included in the Project Implement Plans (PIP) attached in Appendix D (Attachments A.10-1 A.10-9).

1. Meals on Wheels

In this innovative pilot, PG&E will help home-bound senior and disabled customers save energy and lower their cooking bills by providing them with microwave ovens to heat their food. Microwaves are up to 80 percent more efficient than regular ovens. PG&E can achieve low-cost targeted marketing by partnering with the local Meals on Wheels food providers who are already in these customers' homes and who will know which customers could benefit from the use of a microwave. This pilot tests a new technology in an important market segment, leveraging a nationally known low-income service provider. PG&E intends to expand the pilot into multiple Meals on Wheels locations during the 2009-2011 program period.

2. Habitat for Humanity

In this pilot, PG&E will team up with East Bay Habitat for Humanity to provide energy efficient homes to low and very-low income families with children. This pilot has many beneficial features, including targeted outreach to the families through the Habitat organization, working with the Habitat team to assemble and train a

construction crew skilled in EE techniques, providing energy efficient low-income housing, and partnering with a nationally recognized low-income service organization. While it is in the Habitat neighborhoods, PG&E will also reach out to surrounding non-Habitat customers to extend CARE and LIEE services to those who are eligible. PG&E will explore the possibility of increasing the pilot to include other Habitat for Humanity partnerships over the 3-year period.

3. City of San Jose

For this pilot, PG&E will join the City of San Jose in creating a comprehensive approach to community well-being that brings together physical safety, economic security, empowerment, and environmental sustainability. This project will target six neighborhoods undergoing comprehensive revitalization. PG&E will leverage trusted community relationships to reach otherwise hard-to-reach customers and distribute education materials. All education will be provided in three languages (English, Spanish and Vietnamese) through neighborhood community meetings, newsletters, community fairs, block captains, and other established community channels as well as direct mailings.

PG&E will work with the city to develop a list of EE measures, neighborhood-wide KWh reduction goals, and ways to make the program seamless across those who qualify for PG&E's CARE and LIEE programs and those who do not due to income levels, but who qualify for related city programs. Projects may include demonstration homes, neighborhood case studies and testimonials, and other ways to reach and persuade all residents to achieve EE savings.

4. Community-Based Energy Education Workshops

PG&E is proposing to continue to work with community based organizations to offer group energy educations. This pilot was first implemented as part of the 2007-2008 LIEE program, and will be expanded into other communities over the 2009-2011 program cycle.

In the initial pilot, PG&E enlisted three local community based organizations to refine how we provide energy education services to low-income customers. In particular, this pilot focuses on rural areas

by our current Energy Partners Program. The initial organizations are the Glenn County Human Services Agency, the Redwood Community Action Agency, and the Amador-Tuolumne Community Action Agency.

This pilot uses a "train the trainer" approach to spreading the education as well as collecting back customer survey information. First, PG&E will provide EE training to these organizations to leverage their ability to provide that training out into the communities they serve. Then the organizations will provide the training to their low-income constituents and survey the impact of the training on their behaviors and energy use patterns. Finally, PG&E will provide the survey results to a joint state-wide utility study to determine the best way to improve our low-income energy education programs so that they drive lasting changes in energy behaviors that will reduce customer bills and GHGs.

Over the 3-year program cycle, PG&E will continue to expand its network of local community agencies offering energy education workshops.

5. On-Line LIEE/Energy Partners Training

Given the urgent need to rapidly train new LIEE and demand-side contractors to meet California's ambitious energy and climate change goals—and meet California's vision of being a leader in the development of green jobs—this important pilot will test the viability of providing our successful Stockton Energy Training Center curriculum on-line for some LIEE positions.

The LIEE program creates green-collar jobs that are often filled by low-income people in the same communities in which they work. PG&E trains all its LIEE implementers at its Stockton Energy Training Center, as described in more detail in Section V.D.3. In support of the long term strategic planning goals, PG&E proposes to pilot on-line training for its LIEE Weatherization Specialists or Energy Specialists to test the benefits of decentralized training opportunities.

On-line training provides several cost and convenience advantages: contractors can take the training without having to travel

(thereby reducing their costs and ours), and they can study the materials at their own pace (which is particularly important for people newly entering the field who may be juggling other commitments). The training center will continue to be the source for on-site laboratory, workshop, and materials-driven training. A variety of new entrants and contractors will be engaged to develop the curriculum as well as test the effectiveness of the on-line approach.

6. City of San Joaquin (Fresno County)

This is a government-private partnership wherein PG&E will join with the City of San Joaquin in Fresno County to target the hardest-to-reach, rural Hispanic customers who have not responded to traditional marketing, outreach and lead generation. P&GE will leverage existing city resources to increase awareness and recruit greater participation.

A key feature of this pilot is using a local contractor who will work with the city to identify local residents to become apprentices, thereby helping the city's 27 percent unemployment rate as well as breaking down trust barriers with customers. The partnership will also use city council meetings, community events, and neighborhood gatherings to create community energy champions and raise the overall knowledge on a community-wide basis.

7. High Efficiency Clothes Washers

This pilot responds to the Commission's request that we consider technologies that improve water as well as energy efficiency. High efficiency clothes washers can save customers up to 45 percent on their water use and 60 percent on their energy use. By installing 1,000 of these washers in qualifying LIEE homes during 2009, PG&E will discover and assess any unforeseen issues involving installation, expense or feasibility. Through the data it collects, PG&E will then assess the cost-effectiveness of incorporating this measure into the LIEE program on a regular basis for 2010-11.

8. SmartAC

This pilot will test drive a new level of coordination between PG&E's LIEE program and SmartAC and DR programs. PG&E'S

LIEE Energy Specialists are already in low-income customer homes with air conditioning units, and PG&E's SmartAC and DR programs already offer smart technologies that allow PG&E and customers to remotely adjust air conditioning use during summer-peak power system emergencies.

By coordinating these programs, PG&E can personally reach low-income customers who might not otherwise participate in SmartAC, and—if they want—enroll them in the SmartAC Program. This helps both the customer and the State by widening the reach of "smart" energy technologies. Customers learn that they need not sacrifice comfort or safety to participate, and they can always override the SmartAC activation if necessary.

9. SmartMeter™

Upon roll-out of PG&E's SmartMeter™ program, PG&E anticipates that its low-income customers may need targeted educational assistance to learn how best to work with the SmartMeter™ technology to manage their total energy use. Low-income customers will be taught how they can shift their energy use to "off-peak" periods and potentially take advantage of time-of-use (TOU) rates to further lower their energy bills. This will help both low-income customers as well as the state's continuing need to drive more energy use "off-peak". The timing of this pilot will be coordinated with the full implementation of the SmartMeter™ Program.

H. Studies

PG&E is proposing several evaluations and studies for the 2009-2011 period aimed at helping PG&E learn what it needs to know about its low-income customer populations to further segment, develop and fine-tune strategies to achieve the 2020 goal of reaching all eligible customers that want to participate.

These studies include:

Program impact evaluation;

- Process evaluations of new program delivery strategies, including an assessment of successful energy education strategies;
 - Non-Energy Benefits study;

- Refrigerator effective useful life (EUL) degradation study; and
- Market segmentation study.

1. Impact Evaluation and Related Studies

An accurate determination of measure savings is critical for guiding program delivery and determining cost effectiveness. Impact, process and related studies facilitate the achievement of the Programmatic Initiative by determining measure savings and improving programs that generate savings. When parameters that determine measure savings are unclear—such as the EUL of existing appliances—studies that uncover these figures also facilitate the achievement of the Programmatic Initiative. Finally, studies that clarify non-energy related benefits of low-income programs help determine cost effectiveness in full and also guide program delivery which also support the achievement of the Programmatic Initiative.

PG&E also proposes a Joint Utility Non-Energy Benefits study to quantify these elements of a cost-effectiveness analysis, which is a key determinant of program design. Utility personnel and other stakeholders have raised questions about the methods used to develop the current values assigned to non-energy benefits of the programs, which come from a study that is now several years old.

PG&E therefore anticipates the need for estimated 3-year total funding as shown in Table V-6 below for the following measurement and evaluation (M&E) work related to the 2009-2011 LIEE program:

TABLE V-6 PACIFIC GAS AND ELECTRIC COMPANY MEASUREMENT AND EVALUATION OF LIEE PROGRAM – PG&E

Line No.	Statewide Studies – Contract Costs	Total Cost	PG&E Share	PG&E Cost
1	Impact Evaluation of the 2010 LIEE Program	\$600,000	30%	\$180,000
2	Process Evaluation of the 2009 LIEE Program	\$250,000	30%	\$75,000
3	Non-Energy Benefits Study	\$300,000	30%	\$90,000
4	Refrigerator Degradation EUL Study(1)	\$200,000	33.33%	\$66,660
5	LIEE Household Segmentation Study(2)	\$200,000	60%	\$120,000
6	Total	\$1,550,000		\$531,660

¹ Joint study funded between the three electric utilities: PG&E, SCE and SDG&E.

1 An impact evaluation would be expected in 2010 if the previous 2 2- to 3-year cycle for requiring impact evaluations continues to be followed, with the next mandated study being the evaluation of the 3 2007-2008 LIEE Program. 4 Given the primary role of refrigeration in LIEE savings, [22] PG&E 5 and the other electric utilities propose a study in 2009 of refrigerator 6 retention and efficiency degradation to determine optimal refrigerator 7 replacement criteria. 8 These studies are described in Appendix D, Attachments 9 A-10.10 through 10.14. 10 2. Process Evaluation 11 A Joint Utility process evaluation (described in 12 Attachment A.10-11) is proposed because one has not been 13 performed on the LIEE program for several years. PG&E believes 14 15 that with the many proposed changes in the 2009-2011 program, it

² Joint study proposed and funded between PG&E and SCE.

The LIEE PY2005 Impact Evaluation found that refrigerator savings accounted for 78 percent of the total energy savings realized by the program. See West Hill Energy & Computing, Inc. Impact Evaluation of the 2005 California Low Income Energy Efficiency Program Final Report, December 2007.

would be prudent to conduct an evaluation of the effectiveness and efficiency of the program design and operations. [23] A component of this process evaluation will explore attitudinal and behavioral aspects of its LIEE and CARE population. In particular, we are interested in determining customer willingness to participate in energy saving programs, the particular needs of high usage customers and how all of our low-income customers respond to energy education and communication efforts.

3. Joint Utility LIEE Household Segmentation Study

In addition to studies that look directly at energy and demand savings associated with the LIEE program, PG&E and the other IOUs are also interested in exploring attitudinal and behavioral aspects of their LIEE and CARE population. In particular, the utilities want to assess customer willingness to participate in energy saving programs, the particular needs of high usage customers and how all of our low-income customers respond to energy education and communication efforts. Along with SCE, PG&E is proposing a Household Segmentation Study to explore these issues. This study will directly promote the first strategic goal of the Low Income section of the CEESP to develop customer segmentation and will support the programmatic initiative goal of achieving 25 percent customer participation by year-end 2011.

This study will look at identifying and segmenting low-income customers most likely and willing to participate. PG&E believes that increasing the precision of targeting methods to various customer segments will help the identification of eligible and willing customers for the LIEE program. Some potential target populations include:

- Customers with high energy use;
- Customers with low energy use;

^[23] The CPUC-adopted *California Energy Efficiency Evaluation Protocols* document states, "It is anticipated that most programs will have at least one in-depth comprehensive process evaluation within each program funding cycle (e.g., 2006-2008), but a program may have more or less studies depending on

- In-language customers;
 - Customers with the greatest energy burden;
 - Rural/urban customers;
 - Housing types; and
 - Household size.

PG&E anticipates that successful targeting will utilize existing data sources such as income eligibility at the block group and small area level, payment/arrearage history, energy usage history, housing age and type (single/multi-family, mobile home), and fuel commodity. The study would also examine usage sensitivity to weather changes. This study is further described in Attachment A-10.14.

VI. BUDGET

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A. Budget Discussion

PG&E's 2009-2011 program supports the Commission's programmatic initiative adopted in Decision 07-12-051. In order to deliver assistance to 25 percent of PG&E's low-income eligible and willing customers by 2011, PG&E has established the budgets and home-treated goals shown in Table VI-1.

TABLE VI-1 PACIFIC GAS AND ELECTRIC COMPANY 2009-2011 LIEE BUDGET

Line No.	Program Year	Home Goal	Budget
1	2008(1)	58,200	\$77,733,500
2 3 4	2009 2010 2011	80,000 110,000 110,000	\$102,702,000 \$142,011,000 \$147,625,000
5	Total for 2009-2011(2)	300,000	\$392,338,000

¹ This amount excludes NGAT dollars.

² The 2009-2011 LIEE budget shown in this table excludes REACH PLUS.

To accommodate the significant increase in LIEE Program goals to enroll 25 percent of estimated eligible low income customer by 2012, the LIEE Program budget has increased in support of reaching these programmatic goals. Since the program inception in 1983, the original LIEE focus was on delivering weatherization services through the Big 6 measures: caulking, minor home repairs, attic insulation, door weather-stripping, low-flow showerheads and water heater blankets. The program has continued to evolve, especially since the Rapid Deployment Decision in 2001, and new measures were added, the LIEE program was standardized statewide, and utility budgets were increased.

PG&E's LIEE program team re-evaluated what makes the most sense, and provides the biggest "bang for the buck" to our low-income customers. To design its 2009-2011 program, PG&E considered what new measures should be added, while focusing on dollar savings for customers. PG&E closely examined a range of options, focusing on the number of housing units treated, and the variety of measures to be installed. In this process, PG&E developed its list of measures to be offered, examining cost-effectiveness and overall energy savings for LIEE customers.

Major cost drivers in the LIEE budget planning process included:

- Number of units treated— The LIEE programmatic initiative to treat 25 percent of eligible and willing customers by 2012—directives by the Commission in Decision 07-12-051 included increasing the number of units treated in 2009-2011 as a means of achieving the goal of treating all qualifying customers by 2020.
- Cost per unit treated—recent years saw rapid escalation (35 percent 2004-2007) after five years of modest growth (12 percent 1999-2004); and

As described in Section V, PG&E's proposed 2009-2011 LIEE program delivery includes a gas and electric tier approach. PG&E's electric customers will be divided into low, medium and high tiers, based on their electric use at Tiers 1-2, Tier 3 and Tiers 4-5. PG&E also tiered gas usage and divided gas customers into Tier 1 below-baseline low

usage customers, and Tier 2 above-baseline high usage customers. At 73 percent penetration, PG&E believes its current CARE customers represent a good proxy for PG&E's LIEE low income population. Thus to establish customer goals in each tier, CARE and historical participant data were applied to the current tier structure to set benchmarks. PG&E then set LIEE goals for each tier for 2009-2011 program years.

PG&E's program managers estimated budget categories based on their experience and understanding of the typical low income population housing stock and measure needs in PG&E's service area. PG&E program managers assessed the percentage of customers that required a measure in previous years and identified any significant trends. For example, PG&E has noted that need for attic insulation has decreased over the years as more older homes have already been weatherized or retrofitted in California and insulation has become standard in newer homes. LIEE measures available to customers in each tier are described in Section V. The upward and downward trends in historical measure installation rates in different housing stock types and climate zones were analyzed to develop penetration installation rates. These rates were then applied to each measure within each tier to plan the anticipated number of measures to be installed. Budgets were calculated by multiplying the projected number of measures by the average install cost per measure. Escalation costs of 4 percent were applied to 2010 and 2011 program years in anticipation of cost of living increases.

In planning our 2009-2011 LIEE program and budget request, PG&E program managers took into account past program trends and housing stock; however they will constantly assess and reassess their initial assumptions as the program years progress so that all participating homes each year will get all measures for which they qualify.

PG&E's budget also includes nine innovative pilots and five joint utility studies. The PG&E pilots explore new measures, community partnerships, job training, leveraging, education, and outreach strategies that will help PG&E achieve the LIEE programmatic initiative. The five multi-utility studies include impact and process evaluations and segmentation studies. Costs will be shared as indicated between utilities

in Table V-6. Pilots and studies are more thoroughly described in Sections V.G and V.H, and in Appendix D.

PG&E's LIEE budget also includes marketing and outreach funds to integrate EE and DR programs. These funds will be used to integrate program messages across energy efficiency programs. The LIEE program has allocated \$500,000 for integration purposes.

PG&E believes that the requested level of funding provides the optimal balance between the important and increasingly visible benefits that the LIEE program provides to our customers, and the ongoing need to keep rates low and stable.

B. Tracking and Reporting Program Costs

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PG&E proposes to track program costs consistent with the program budget categories defined in Attachment A-1 to this testimony. The program budget categories in Attachment A-1 are used for monthly and annual LIEE reporting and were most recently approved by the Commission in a November 2007 letter from the Energy Division Director to the utilities. Although program reporting was substantially revised for the 2007 time period after several years of relatively stable reporting, the reporting of program expenses underwent only minor changes. The budget and expense categories have remained fairly consistent since 2001, which has facilitated continuity of reporting throughout the decade. PG&E proposes to maintain monthly and annual reporting according to the approved LIEE reporting categories in 2009, 2010 and 2011. PG&E believes this will permit comparable cost benefit analysis of each program element across the utilities. PG&E will continue to work with Energy Division to adjust the content and format of the reports with the goal of presenting streamlined information that facilitates program oversight.

C. Budget Flexibility

PG&E proposes a 3-year LIEE program budget of \$392,338,000 for the 2009-2011 period. [24] PG&E further requests authorization to carry forward or carry back funding into 2009, 2010 or 2011 during the 3-year funding cycle to promote seamless program delivery to customers

^[24] This amount excludes REACH PLUS program funding.

throughout the 2009-2011 timeframe. PG&E requests full authority to shift funds among program categories in 2009, 2010 and 2011. This flexibility will enable the utilities to make necessary adjustments among appliance purchases, weatherization measures, marketing, training, and other activities to efficiently achieve 25 percent of the Commission's programmatic initiative by 2011.

Prior to 2007, the Commission had provided full flexibility to the utilities to shift funds among program categories as needed to achieve program objectives. In Decision 06-12-038, the Commission restricted movement of funds among measurement and evaluation, general administration, and the regulatory compliance categories. These restrictions have proven to be problematic as we enter the 2008 time period. The Commission and utilities could not have foreseen the increased resource requirements that would be necessary to develop this 2009-2011 LIEE Program Application and the LIEE chapter of the CEESP through the public workshops, meetings, presentations, and data analysis that support their implementation in 2008. To avoid future resource constraints, PG&E requests that the 2007-2008 fund shifting restrictions be removed.

If the Commission should be delayed in issuing a decision on PG&E's 2009-2011 low income programs budget application, PG&E requests interim authorization from the Commission to continue LIEE activities into 2009. Additionally, the Commission authorized PG&E to extend its contract with its prime LIEE contractor through December 31, 2008, while a new competitive bid is conducted in 2008 for the 2009-2011 LIEE program. If a decision adopting the 2009-2011 program is delayed, PG&E's competitive bid will also be delayed, therefore PG&E requests Commission authority to continue to work with its prime LIEE contractor into 2009.

1. Measurement and Evaluation Budgets

An additional complication for LIEE budgets is the cross-year funding of M&E studies. For example, Decision 06-12-038 authorized an impact evaluation study of the PY2008 LIEE program. Impact evaluation work cannot begin until a year after the program is

completed, when there is a full year's worth of post-program installation data to analyze. Thus, funds authorized for the PY2008 impact evaluation study will not even begin to be spent until 2009, and will not be fully spent until completion of the study in 2010. PG&E's portion of this statewide PY2008 study is \$180,000.

In the past, PG&E has shown the entire amount of M&E funding available each year, regardless of what year it was expected to be expended. In other words, M&E funding has not been additive across years, but is more like a checking account balance report of what's available. This may have created a false perception that M&E funding is not being spent. In fact, all M&E funding has been authorized and is committed, although the studies for which it is allocated may not occur for several years, and then may take several years to complete.

This situation creates unique reporting problems for the M&E category. For example, the PY2008 impact evaluation was authorized in 2006 and is not set to begin until 2009. This funding will not be requested in our 2009-2011 budgets because it was previously authorized. However, most if not all of it will be expended during the 2009-2011 LIEE program cycle, yet it will be reported with 2009-2011 LIEE program expenditures that will be authorized by an anticipated 2009-2011 LIEE program decision. Additionally, if a PY2010 LIEE evaluation is authorized, part of the funding for that study will not be expended until 2012, in the next application program cycle. Table VI-2 shows how M&E budgets cross years and program cycles.

PG&E requests permission to carry-over funding for authorized M&E studies across program years and program cycles to be used to fund these studies as they occur.

TABLE VI-2 PACIFIC GAS AND ELECTRIC COMPANY PG&E ANNUAL MEASUREMENT AND EVALUATION BUDGETS

Line No.	Statewide Studies	PG&E Cost	2009	2010	2011	2012
	Impact Evaluation of 2008 LIEE					
1	Program(1)	\$180,000	\$90,000	\$90,000		
	Impact Evaluation of the 2010 LIEE					
2	Program(2)	\$180,000			\$90,000	\$90,000
	Process Evaluation of the 2009 LIEE					
3	Program	\$75,000		\$75,000		
4	Non-Energy Benefits Study	\$90,000	\$90,000			
5	Refrigerator Degradation EUL Study	\$66,660	\$66,660			
6	LIEE Household Segmentation Study	\$120,000	\$120,000			
7	Total 2009-2011 Proposed Budget	\$531,660	\$276,660	\$75.000	\$90,000	\$90,000
_ ′	Total 2009-2011 FTOposed Budget	Ψ001,000	Ψ210,000	Ψ10,000	Ψου,οοο	Ψ00,000
8	Total Including Previous Authorized M&E	\$711,660	\$366,660	\$165,000	\$90,000	\$90,000

Authorized in D.06-12-038. The 2008 LIEE impact study will be conducted and invoiced in 2009-2010. The actual per year expenditure is estimated and may not be 50 percent per year.

1 VII. Revenue Requirements and Rate Impacts

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This section describes PG&E's 2009-2011 LIEE electric revenue and gas PPP funding requirements and cost recovery proposal. PG&E proposes to increase its 2009 LIEE electric revenue requirement by \$15.62 million and to increase its 2009 gas PPP-LIEE funding requirement by \$19.51 million. PG&E's proposed funding requirements for all three program years are presented in Table VII-1 below. The subsequent sections of this testimony address PG&E's proposed 2009-2011 LIEE program expenditure budgets, related funding requirements, and cost recovery. Rate and bill impacts are also presented.

The 2010 LIEE impact study will be conducted and invoiced in 2011-2012. The actual per year expenditure is estimated at 50 percent, and may not be the actual amount carried over into 2012.

TABLE VII-1 PACIFIC GAS AND ELECTRIC COMPANY ELECTRIC REVENUE AND GAS LIEE PPP FUNDING REQUIREMENTS FOR 2009-2011 (\$ THOUSANDS)

Line No.	Description	2008	2009	2010	2011	2009-2011 Funding Total
1	Electric Revenue Requirement (including FF&U)	\$54,971	\$70,592	\$95,213	\$98,730	\$264,535
2	Gas LIEE PPP Funding Requirement	\$23,320	\$42,827	\$57,764	\$59,898	\$160,489
3	Total	\$78,291	\$113,419	\$152,977	\$158,628	\$425,024

A. Electric Revenue Requirement and Gas PPP Funding Requirement for the Proposed 2009-2011 LIEE Portfolio

As discussed in Section V of this testimony, PG&E proposes the 2009-2011 annual LIEE budgets shown in Table VII-1, above. The amounts to be recovered in rates consist of PG&E's total annual program budgets, less any unspent budget amounts carried over from the 2007-2008 program period that have already been recovered in rates. [25] An allowance for franchise fees and uncollectibles (FF&U) accounts expense is included in PG&E's proposed electric LIEE revenue requirement.

In Decision 06-12-038, the Commission adopted a 70/30 expense ratio to assign PG&E's LIEE program costs between PG&E's electric and gas customers, respectively. The 70/30 expense ratio was based on a forecast of the cost of electric and gas LIEE measures to be installed for PG&E's customers in the current program period. PG&E proposes to update its LIEE program cost apportionment between electric and gas customers to reflect the proposed program budgets shown in Table VII-1. Based on PG&E's proposed budget, the electric revenue requirement, net of FF&U, is \$69.88 million and the gas revenue requirement is

^[25] Carry-over amounts will not be known until after a decision is issued in this proceeding.

\$42.83 million for 2009. Consequently, PG&E's LIEE expense electric/gas ratio for 2009-2011 is 62/38.

B. Recording of PG&E's Electric and Gas LIEE Expenses

PG&E will record 2009-2011 LIEE expenses consistent with the adopted electric/gas expense ratio adopted in this proceeding. This proposed method is consistent with the method adopted for the recording of EE program expenses by the Commission in Decision 05-09-043. Accordingly, PG&E will record LIEE expenditures based on a ratio of 62/38 percent for electric and gas, respectively. PG&E will continue to monitor the expenses on a measure per measure basis during the budget period and may propose revisions to the electric/gas split.

C. Funding Flexibility

PG&E requests authority to shift funds among each of the 2009-2011 program years. This will allow PG&E to carryover unspent and uncommitted funds from previous years into future program years within the 2009-2011 funding cycle. PG&E also requests authorization to carry forward funds from future years into current years, within the 2009-2011 funding cycle, to allow PG&E to respond to unforeseen market influences, such as increased market demand. PG&E will report these occurrences as part of its regular reporting requirements to the Commission. This proposal is consistent with the practices currently adopted by the Commission for PG&E's authorized Energy Efficiency Program Funding.

D. Rate and Bill Impacts

Approval of PG&E's proposed 2009-2011 LIEE budgets will result in increases in PG&E's gas and electric PPP charges. PG&E's proposed 2009-2011 LIEE rate and bill impacts among PG&E's electric and gas customer classes are shown in Tables VII-2 and VII-3 for PG&E's electric and gas customers, respectively.

TABLE VII-2 PACIFIC GAS AND ELECTRIC COMPANY ESTIMATED ELECTRIC RATE IMPACTS FROM 2009-2011 LOW-INCOME ENERGY EFFICIENCY PROGRAM REQUEST

Line No.	Electric Customer Class	Dollar Increase in 2009 for Low Income Energy Efficiency (\$000)	Total Percentage Increase in 2009 for Low Income Energy Efficiency	Dollar Increase in 2010 vs. 2009 for Low Income Energy Efficiency (\$000)	Total Percentage Increase in 2010 vs. 2009 for Low Income Energy Efficiency	Dollar Increase in 2011 vs. 2010 for Low Income Energy Efficiency (\$000)	Total Percentage Increase in 2011 vs. 2010 for Low Income Energy Efficiency
1	Bundled Service						
2	Residential	\$6,326	0.1%	\$16,287	0.3%	\$17,710	0.4%
3	Small Commercial	\$1,844	0.1%	\$4,750	0.3%	\$5,165	0.4%
4	Medium Commercial	\$2,544	0.1%	\$6,555	0.4%	\$7,127	0.4%
5	Large Commercial	\$1,426	0.1%	\$3,673	0.4%	\$3,993	0.4%
6	Streetlights	\$93	0.1%	\$240	0.4%	\$261	0.4%
7	Standby	\$36	0.1%	\$92	0.3%	\$100	0.3%
8	Agriculture	\$702	0.1%	\$1,809	0.3%	\$1,967	0.4%
9	Industrial	\$1,461	0.1%	\$3,764	0.3%	\$4,093	0.4%
10	Total Bundled Change	\$14,432	0.1%	\$37,170	0.3%	\$40,417	0.4%
11	Direct Access Service						
12	Residential	\$11	0.3%	\$27	0.8%	\$29	0.8%
13	Small Commercial	\$15	0.3%	\$39	0.7%	\$43	0.7%
14	Medium Commercial	\$284	0.4%	\$730	1.0%	\$794	1.1%
15	Large Commercial	\$242	0.4%	\$624	1.0%	\$678	1.1%
16	Agriculture	\$4	0.3%	\$10	0.8%	\$11	0.9%
17	Industrial	\$502	0.4%	\$1,293	1.2%	\$1,406	1.3%
18	Total Direct Access Change	\$1,057	0.4%	\$2,724	1.1%	\$2,962	1.2%

Under PG&E's LIEE program budget proposal, the 2009 bill for a typical bundled residential electric customer using 550 kWh per month will increase \$0.03 from \$72.13 to \$72.16. The bill for a typical bundled residential customer using approximately twice the average baseline allowance, or 850 kWh per month, will increase \$0.24 from \$148.44 to \$148.68.

TABLE VII-3 PACIFIC GAS AND ELECTRIC COMPANY ESTIMATED GAS RATE IMPACTS FROM 2009-2011 LOW INCOME ENERGY EFFICIENCY PROGRAM REQUEST

Lin e No.		2008 Current Revenues	2008 to 2009 Proposed Revenue Change	2008 to 2009 Percent Change	2008 to 2010 Proposed Revenue Change	2008 to 2010 Percent Change	2008 to 2011 Proposed Revenue Change	Percent 2008 to 2011 Change
1	Core Retail - Bundled *	(a)	(b)	(c)	(d)	(e)	(f)	(g)
2	Residential Non-CARE	\$2,423,961	\$11,823	0.49%	\$20,877	0.86%	\$22,170	0.91%
3	Residential CARE	\$381,971	\$2,293	0.60%	\$4,048	1.06%	\$4,299	1.13%
4	Commercial, Small	\$904,826	\$2,593	0.29%	\$4,579	0.51%	\$4,863	0.54%
5	Commercial, Large	\$84,268	\$598	0.71%	\$1,056	1.25%	\$1,121	1.33%
6	Core Retail - Transportation Only**	_						
7	Residential Non-CARE	\$2,365	\$37	1.57%	\$66	2.78%	\$70	2.95%
8	Residential CARE	\$126	\$5	4.22%	\$9	7.45%	\$10	7.92%
9	Commercial, Small	\$18,181	\$188	1.03%	\$332	1.82%	\$352	1.94%
10	Commercial, Large	\$363	\$15	4.22%	\$27	7.44%	\$29	7.90%
11	Non-Core - Transportation Only**	_						
12	Industrial Distribution	\$35,595	\$524	1.47%	\$926	2.60%	\$983	2.76%
13	Industrial Transmission	\$57,900	\$1,413	2.44%	\$2,495	4.31%	\$2,650	4.58%
14	Industrial Backbone	\$430	\$16	3.79%	\$29	6.70%	\$31	7.12%
15	Electric Gen - Dist/Transmission	\$34,661	\$0	0.00%	\$0	0.00%	\$0	0.00%
16	Electric Gen - Backbone	\$4,268	\$0	0.00%	\$0	0.00%	\$0	0.00%
17	Wholesale - Transportation Only **	_						
18	West Coast Gas - Castle	\$43	\$0	0.00%	\$0	0.00%	\$0	0.00%
19	West Coast Gas - Mather-D	\$45	\$0	0.00%	\$0	0.00%	\$0	0.00%
20	Transmission Level Wholesale	\$644	\$0	0.00%	\$0	0.00%	\$0	0.00%
21	NGV, Core Procurement	\$11,988	\$0	0.00%	\$0	0.00%	\$0	0.00%
22	Unbundled Service	\$171,685	\$0	0.00%	\$0	0.00%	\$0	0.00%
23	Total Change	\$4,133,321	\$19,507	0.47%	\$34,444	0.83%	\$36,577	0.88%

^{*} Bundled core revenues are based on rates that include: i) an illustrative procurement component that recovers intrastate and interstate backbone transmission charges, storage, brokerage fees and an average annual Weighted Average Cost of Gas (WACOG) of \$0.733 per therm; ii) a transportation component that recovers customer class charges, customer access charges, CPUC fees, local transmission (where applicable) and distribution costs (where applicable); and iii) where applicable, a gas public purpose program surcharge that recovers the costs of low income California Alternate Rates for Energy (CARE), low income energy efficiency, customer energy efficiency, Research Development and Demonstration program and BOE/CPUC Admin costs. Actual procurement rate changes monthly.

^{**} Transportation Only revenues are based on rates that include: i) a transportation component that recovers customer class charges, customer access charges, CPUC fees, local transmission (where applicable) and distribution costs (where applicable); and ii) where applicable, a gas public purpose program surcharge that recovers the costs of low income California Alternate Rates for Energy (CARE), low income energy efficiency, customer energy efficiency, Research Development and Demonstration program and BOE/CPUC Admin costs. Transportation only customers must arrange for their own gas purchases and transportation to PG&E's citygate/local transmission system.

Under PG&E's LIEE program budget proposal, the bill for a typical bundled residential customer using 40 therms per month in 2009 will increase \$0.50 from \$54.74 to \$55.24.

PG&E will incorporate the annual electric LIEE revenue requirement authorized in this proceeding into electric rates in the AET with other rate changes effective January 1 of each year in the program budget period, or as soon thereafter as possible. Any required LIEE electric rate change resulting from this proceeding will be implemented in accordance with the then-current adopted revenue allocation and rate design methods adopted for the LIEE revenue component of electric PPP rates.

PG&E will incorporate the gas funding requirement authorized in this proceeding into gas rates in the annual gas PPP surcharge advice letter and AGT filings with other rate changes effective January 1 of each year in the program budget period, or as soon thereafter as possible. Similarly, any gas LIEE revenue change will be allocated among customer classes consistent with then-current adopted practice. If a decision is not issued in time to incorporate the proposed funding requirement in PPP surcharge rates by October 31, 2008, PG&E requests authority to supplement its PPP surcharge advice letter to incorporate changes adopted in this proceeding.

VIII. Competitive Bid

PG&E routinely bids out administration of its LIEE program. The LIEE program administrator competitively bids out program implementation work and hires the program contractors.

The current LIEE administration contract with Richard Heath and Associates, Inc. (RHA), is the result of a competitive bid. PG&E extended its contract with RHA for one year (2008) following approval from the Commission. Since 1997, PG&E has bid out the administration of the LIEE program three times. As directed by Decision 06-12-038, PG&E is bidding out its 2009-2011 program administration. This will be a 3-year contract.

Per CPUC Decision 07-12-051, the LIEE program is being redesigned and requires the 2009-2011 application to be filed on May 15, 2008. PG&E's RFP will be developed alongside the 2009-2011 application. PG&E requests a timely 2009-2011 LIEE Program Decision in order to bid out the prime

contract, award the bid and negotiate a contract before the start of the 2009-2011 LIEE program. In the event that PG&E's application is radically modified after it has been filed, PG&E may need to rescind the RFP for adjustments. In the event that this does occur, the LIEE program may not be ready to implement on January 1, 2009. Additionally, as PG&E only had permission to extend RHA's contract through December 31, 2008, PG&E will need explicit Commission authorization to extend RHA's contract into 2009.

Current Program

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Currently, RHA is the prime contractor for PG&E's LIEE program and is responsible for all aspects of the program from enrolling the customer, measure and appliance installations and meeting all program goals. RHA manages the work of 20 subcontractors ensuring that all work is installed per the Weatherization Installation Standards Manual and meets all program requirements as stated in the Statewide Policy and Procedures Manual. After the measures are installed, PG&E performs random post inspections to ensure the measures are installed properly and safely.

RFP Overview

The RFP covers all aspects of the work required by both the Prime Management Firm (PMF) and all subcontractors required to perform the actual measure installations and appliance installation and recycling. The RFP states which licenses are required, specific insurance requirements and the Home Improvement Sales person certificate requirement. The RFP specifically details mandatory training requirements required by all who perform the field work or who oversee the field work. Personnel attending these mandatory training classes must pass the written tests and or practical tests to be eligible to be able to work or monitor the work in the program. The RFP also requires the PMF to develop and implement a management plan which must be approved by PG&E that describes in detail how the PMF will monitor all aspects of the program (training, quality control, records management, contractor performance, correction of failed work). The RFP itemizes all reporting, invoicing, data, installation, benchmarks, year end goals, customer satisfaction, PMF's call center, NGAT, and NGAT Monoxer Calibration and Maintenance requirements. The RFP further requires the use and knowledge of the Statewide Installation Manual and the Statewide

Policies and Procedures Manual, knowledge of all state, local and city codes and standards, working knowledge of PG&E's Energy Partners Online (EPO) database, use of the customer information in EPO to target existing CARE customers for the LIEE program, and program collateral materials required to be used in the program. Lastly, the RFP specifically details the contractual time frames for when work must be accomplished, including that all work must be installed by December 31 of each calendar year.

Bidders List

PG&E has a list of contractors who may be interested in receiving the RFP. This list currently consists of all existing PG&E contractors who are working in the LIEE program, a list of PG&E contractors who have asked be part of the bid process, LIHEAP contractors, SDG&E contractors, SoCalGas contractors, SCE contractors and other interested parties who have expressed interest in the LIEE program. PG&E continues to seek additional contractors who have project management experience and other organizations who might be interested in bidding for either the PMF or the implementation portion of the program. PG&E will send out invitations to all contractors on the list asking them to respond if they are interested in bidding on the project management piece of the contract. Once the PMF has been selected, the PMF will be required to bid the actual installation and appliance delivery/recycling part of the program.

IX. Conclusion

The Commission should adopt PG&E's requested budget for the 2009-2011 LIEE program.

In Decision 07-12-051, the Commission expressed its desire that the LIEE program balance: (1) California's need for energy efficiency; (2) all LIEE customers' needs for all cost-effective assistance; (3) continuing hardship assistance for those in particularly difficult circumstances; and (4) managing the cost burdens to customers outside the LIEE programs. PG&E supports these goals of providing cost-effective energy savings to all LIEE customers while retaining the ability to provide other social benefits such as health, safety and comfort to customers with the deepest needs. In order to achieve this goal, PG&E has designed an LIEE program that combines highly

cost-effective EE measures with less cost-effective measures that nevertheless provide important, yet hard-to-quantify non-energy benefits.

PG&E's proposed program will serve 25 percent of its estimated eligible low-income customers by 2012 as directed by Decision 07-12-051, and includes a cost-effective targeted approach to delivering more comprehensive measures and services to the highest energy users to help them reduce their energy consumption. Additionally, PG&E also recommends revisions to existing measures, new measures, pilot measures, pilot projects, evaluations, and studies. PG&E requests a timely decision on this application so that there can be an on-time 2009 program launch

PACIFIC GAS AND ELECTRIC COMPANY CHAPTER 2 CALIFORNIA ALTERNATE RATES FOR ENERGY PROGRAM PLAN AND BUDGET FOR PROGRAM YEARS 2009, 2010 AND 2011

PACIFIC GAS AND ELECTRIC COMPANY CHAPTER 2

CALIFORNIA ALTERNATE RATES FOR ENERGY PROGRAM PLAN AND BUDGET FOR PROGRAM YEARS 2009, 2010 AND 2011

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PACIFIC GAS AND ELECTRIC COMPANY CHAPTER 2

CALIFORNIA ALTERNATE RATES FOR ENERGY PROGRAM PLAN AND BUDGET FOR PROGRAM YEARS 2009, 2010 AND 2011

I. Introduction

A. Summary of Critical Program Elements and Requests

- Pacific Gas and Electric Company (PG&E) proposes to change the certification period for its California Alternate Rates for Energy (CARE) Sub-Metered and Expanded programs from one year to two years.
- PG&E proposes a survey research study to understand (1) which CARE customers do not respond to multiple recertification and postenrollment income verification requests; (2) why they do not recertify or provide income documentation; and (3) how PG&E can overcome these barriers to their continued participation.
- PG&E requests the approval of its 2009-2011 program budget by October 2, 2008.

B. Program Overview

PG&E is pleased to present its application for the Program Years (PY) 2009-2011 CARE program. PG&E has administered the CARE program since its inception in 1989. In support of the California Public Utilities Commission's (CPUC or Commission) goal of enrolling all CARE-eligible customers who wish to participate in the program, PG&E has dramatically re-imagined its low-income program offerings for 2009-2011 to take advantage of opportunities for closer integration and coordinated outreach between CARE and Low Income Energy Efficiency (LIEE). PG&E is proposing an outreach plan for low-income customers that will integrate efforts to enroll new CARE customers by promoting LIEE awareness and participation. PG&E has worked to integrate low-income assistance programs, Commission staff, and the other investor-owned utilities (IOU) to deliver a highly effective CARE program supporting the

Commission's goal of enrolling all CARE-eligible customers who wish to participate in the program. Additionally, PG&E participated in Commission workshops and sought input through focus groups, meetings, and workshops with other interested parties, including municipalities, community-based organizations and agencies, Low Income Home Energy Assistance Program (LIHEAP) providers, and contractors.

PG&E proposes an administrative budget of \$8.76 million for 2009, \$9.22 million for 2010, and \$9.52 million for 2011. In 2009, this is \$1,029,000 more than adopted for 2007-2008 CARE administration in Decision 06-12-038. These proposals are described in Sections IV and V below.

PG&E will consolidate the electric revenue requirement authorized in this proceeding into electric rates in the Annual Electric True-Up (AET) with other rate changes effective January 1 of each year in the program budget period, or as soon thereafter as possible. PG&E will consolidate the gas funding requirement authorized in this proceeding into gas rates in the annual gas Public Purpose Program (PPP) surcharge advice letter and Annual Gas True-Up (AGT) filings with other rate changes effective January 1 of each year in the program budget period, or as soon thereafter as possible. If a decision is not issued in time for the October 31, 2008 PPP surcharge filing, PG&E requests that the authority to supplement its PPP surcharge advice letter to incorporate changes adopted in this proceeding.

II. Background

Based on Senator Share's Universal Lifeline Telephone Service bill (signed into law in the 1980s), Senate Bill (SB) 987 (Dills – Chapter 212) established an assistance program to provide rate relief to low income households from increasing baseline differentials brought about by baseline rate reform in the mid-1980s. This bill also established that the cost of the program would not be borne solely by any single class of customer.

Commission Decision 89-07-062 created the rate discount program for individually-metered gas and electric customers and master-metered/

sub-metered tenants. The program, called the Low-Income Rate Assistance (LIRA), implemented a 15 percent discount for low-income customers.

The name of the program was changed to CARE in 1995 and the program was expanded to serve qualified non-profit group living facilities, and later, qualified agricultural employee housing facilities.

In 1996, the CARE program began to be standardized across the four IOUs as part of Electric Industry Restructuring legislation. Standardized application forms, unified program cost reporting, and self-certification with post-enrollment random verification were all established during this period.

As a result of the California energy crisis of 2000, the utilities received a one-time, tax-based funding supplement to aid the "Rapid Deployment" of low income programs to those most affected by high energy bills. SB X1-5 dramatically increased outreach funding for the CARE program. This infusion of advertising, marketing and outreach funding—together with Decision 01-05-033 mandates increasing the CARE discount to 20 percent and the income eligibility threshold to 175 percent of the Federal Poverty Level (FPL)—helped the utilities to rapidly increase CARE enrollment levels to all-time highs.

In 2005, the income eligibility guidelines changed again. Since October 2005, PG&E customers with income levels at or below 200 percent of the FPL are eligible to receive a 20 percent discount on their monthly gas and electric charges. Decision 05-10-044 changed the previous upper limit of the CARE income eligibility guidelines from 175 percent to 200 percent FPL, which substantially increased the number of customers eligible for utility CARE rates. This increased income criteria was a proactive response by the Commission and the utilities to provide additional assistance to low income customers during the 2005-2006 Winter Gas Crisis, during which gas prices were expected to rise dramatically.

III. CARE Program Goals and Budget for PY 2009, PY 2010, and PY 2011

This section summarizes how PG&E's proposed program activities and administrative budget for PY 2009-2011 support the Commission's goal of enrolling all CARE-eligible customers who wish to participate in the program. Attachment B-1 shows PG&E's proposed PY 2009-2011 CARE budget by

category. Attachment B-4 provides a summary of PG&E's CARE program proposals described in this application.

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As shown in Attachment B-2, PG&E anticipates decreased CARE penetration levels in 2008, followed by increases in 2009-2011. The decrease in 2008 can be attributed to more customers failing to recertify or failing post-enrollment income verification, and thus being dropped from the program. For this reason, PG&E is requesting approval to do a survey of customers failing these two processes. The proposed survey is detailed in Attachment B-5.

Due to the successes of enrolling and recertifying an average of nearly 700,000 customers annually since 2005, one of the greatest challenges that PG&E faces is retaining these customers as they become due to recertify. Over 400,000 CARE customers are expected to become due to recertify annually in 2008 and 2009. PG&E is dedicated to making process improvements that will improve recertification retention. The CARE program has implemented billing notices, reminder letters, and reminder phone calls for customers due to recertify. Another improvement that will be beneficial in this area is the recent implementation of CARE online enrollment, which allows customers to recertify via the PG&E website. Also, since June 2007, nearly 25 percent of customers applying for CARE have been identified as fixed income, and therefore certified for a 4-year period, as approved in Decision 06-12-038. This will result in fewer customers having to go through the recertification process beginning in June 2009. PG&E is currently investigating other methods to improve recertification retention, such as allowing customers to recertify by phone. The goal of all of these efforts is to lower the number of customers expected to fail the recertification process annually.

Another process resulting in customer attrition is post-enrollment income verification. In order to ensure that only qualified customers are enrolled in CARE, PG&E has increased its post-enrollment income verification to an average of 11 percent of incoming applications. PG&E is verifying a higher percentage of customers whose electric usage is over 300 percent of baseline. Since current rates provide a 73 percent CARE discount for usage above this level, PG&E wants to ensure that only eligible customers are

benefiting from the discount. The CARE program has implemented reminder phone calls and letters to customers who have been selected to provide income verification. However, 65 to 70 percent of customers selected are still failing to provide the requested income documentation. This means over 50,000 customers are expected to fail the post-enrollment income verification process annually.

Finally, the one percent monthly average of customers closing their accounts due to moving in with relatives, moving out of the service area or out of state, etc., will result in attrition of another 125,000 customers annually.

PG&E aims to enroll over 250,000 new CARE customers annually during program years 2009-2011. This is a very aggressive goal, as new customers are becoming more and more difficult to reach. PG&E employees, agency personnel, outreach workers and volunteers are working throughout the service area to find new, eligible customers to enroll in CARE. PG&E plans to achieve these new enrollment goals largely by continuing its highly successful outreach program, which is described in more detail in Section V.

PG&E is dedicated to understanding and serving our customers, and to overcoming challenges to continue increasing enrollment in the CARE program.

IV. Program Administration

PG&E has administered the CARE program since its inception in 1989. PG&E customers with income levels at or below 200 percent of the FPL are eligible to receive the CARE discount on monthly gas and electric charges. The program targets five separate categories of eligible customers:

- Single-family residential customers with their own PG&E accounts;
- Sub-metered tenants of master-metered customers in facilities such as mobile home parks, and sub-metered apartment complexes;
- Non-profit group living facilities such as half-way homes, rehabilitation facilities, homeless shelters, women's shelters, and hospices;
- Agricultural employee housing facilities such as migrant farm labor facilities, private employee housing, and non-profit farm labor housing; and

 Migrant Farm Worker Housing Centers operated by Office of Migrant Services or by non-profit entities.

Processing/Certification/Verification

PG&E has made great strides towards enrolling all eligible customers. To retain the number of CARE participants and keep enrolling new participants, PG&E received, processed, certified, recertified and verified on average 700,000 applications annually. This number will continue to grow as PG&E increases the number of CARE participants. PG&E requests a budget increase from \$1.6 million in 2008 to \$1.8 million in 2009, \$1.9 million in 2010 and \$2 million in 2011.

The authorized budget of \$1.6 million for the Processing, Certification, and Verification category was unchanged for PY 2006 through PY 2008. Although PG&E is constantly reviewing the processes and making improvements in order to be more cost-effective, the expanded workload requires a budget increase to support additional staff labor and training, and to ensure timely processing of customer applications.

Information Technology/Programming

PG&E proposes the same budget of \$300,000 for 2009-2011. A quarter of the budget is for maintenance of existing databases. The remaining budget is for enhancement of CARE web-based applications to support other languages beside English, new database applications for the Sub-Metered and Expanded Programs, and any technological advances that could simplify enrollment and reduce CARE customer attrition.

Pilots and Studies

PG&E is proposing a study to understand why customers fail to respond to CARE recertification and post-enrollment verification requests.

Attachment B-5 describes this pilot and associated costs.

Measurement and Evaluation

There are no measurement and evaluation studies proposed for CARE during 2009-2011.

Regulatory Compliance

PG&E proposes to spend \$105,000 on regulatory compliance during 2009, followed by \$5,000 increases in 2010 and 2011. These estimates are based on 2006-2007 historical recorded expenditures.

General Administration

Due to expanded workload, PG&E has added program management labor to oversee CARE program operations. To maintain current support of the program, PG&E requests a General Administration budget of \$500,000 in 2009, \$525,000 in 2010 and \$550,000 in 2011.

Commission Energy Division Staff

Ordering Paragraphs (OP) 9 and 10 in Decision 00-02-045 provide the guidance for allocating Energy Division costs among the utilities and between LIEE and CARE. Thirty percent of the total costs are allocated to PG&E, within which 70 percent are allocated to CARE and 30 percent are allocated to LIEE. Based on this allocation, the PG&E CARE portion of projected Energy Division staff costs for 2009-2011 is \$206,000 annually.

PG&E Proposes Same Residential Program Requirements for Tenants of Sub-Metered Facilities

Currently, all sub-metered tenants of master-metered customers who apply and qualify for the CARE program are required to complete and mail a new application to recertify their eligibility annually. Single-family residential customers are required to recertify their eligibility every two years. Customers with fixed-income, whether they are single-family residential customers or sub-metered tenants are required to recertify their eligibility every four years, as approved in Decision 06-12-038. PG&E proposes the same residential program requirements for sub-metered tenants, including a 2-year certification period.

The reason qualifying sub-metered tenants of master-metered customers were required to recertify their eligibility annually was because sub-metered tenants are not customers of the utility, and the utility would be unaware of their relocation or other changes in circumstances. However, PG&E found this reason is no longer valid because the communication between the utility, master-metered customers, and sub-metered tenants has improved tremendously over the years. Assembly Bill (AB) 2104 has also improved the ability to provide reports and receive timely notification of any changes in sub-metered tenants' circumstances.

This proposal is beneficial for both the customer and PG&E. The recertification process can be a burden for sub-metered tenants and

master-metered customers in spite of PG&E's best efforts to make the process as easy as possible.

Over 25 percent of CARE sub-metered tenants do not respond to recertification requests and are subsequently dropped from the program. This includes sub-metered tenants who do not read or speak English, do not understand the recertification request, or misplace the CARE recertification application.

By extending the CARE certification period for sub-metered tenants, PG&E is attempting to mitigate this burden on the customer and decrease the number of non-responding customers that dropped during the recertification process. The risk of keeping non-qualifying sub-metered tenants on CARE by making their certification period the same as single-family residential customers is not any higher than it is for the rest of the population. Furthermore, sub-metered tenants will be required to provide proof of income through the post-enrollment verification process which will ensure qualified sub-metered tenants are on the program.

This proposal will reduce costs for PG&E, as recertification notices for sub-metered tenants will only be mailed, and the returned applications processed, every two years instead of every year. It will also provide more uniform program requirements among all residential customers.

PG&E Proposes a 2-Year Certification for Expanded Programs: Non-Profit Group Living Facilities, Agricultural Employee Housing Facilities, and Migrant Farm Worker Housing Centers

Currently, all facilities of Expanded Programs which apply and qualify for the CARE program are required to recertify their eligibility annually by completing a new application and providing other supporting documents. PG&E proposes to extend the certification period for Expanded Programs from one year to two years.

This proposal is beneficial for both Expanded Program facilities and PG&E. By extending the certification period for Expanded Programs, PG&E is attempting to mitigate the facilities' burden of completing a new application and providing multiple supporting documents every year, and decreasing the number of facilities failing to recertify or delaying completion of the recertification process. Those supporting documents include a copy of

current 501 (c) (3) Federal Tax exemption; copies of social service license and brochures as proof of social services provided to facility residents; and explanation of how the savings PG&E provided for the past year benefited facilities residents.

As recertification notices for Expanded Programs will only be mailed and returned applications processed every two years instead of one, it will help to reduce costs for PG&E.

PG&E Proposes Budget for Cooling Centers Program

In 2008, PG&E's Cooling Center Program budget was approved to be recovered through the California Alternate Rates for Energy Account (CAREA) incremental to the current CARE administrative budget. PG&E requests a Cooling Center Program budget of \$350,000 in 2009, \$400,000 in 2010, and \$450,000 in 2011. This \$50,000 increase in the budget for each year is due to expected increases in the number of participating cooling centers. These costs will be recovered in the next AET process or other proceedings as authorized by the Commission.

V. Outreach

Section 8 Housing

U.S. Department of Housing and Urban Development (HUD) offers two major programs to assist low-income households in obtaining affordable housing. The public housing program provides decent and safe housing for eligible low-income families, the elderly, and persons with disabilities. Public housing comes in all sizes and types, from scattered single-family houses to high-rise apartments for elderly families. Section 8, currently referred to as the Housing Choice Voucher (HCV) program, assists very low-income families, the elderly, and the disabled to afford decent, safe and sanitary housing in the private market. Public housing and the HCV program are administered locally by public housing agencies (PHA). The PHAs receive federal funds from HUD to make housing assistance payments on behalf of the HCV program tenants. HUD also pays the PHAs a fee for the costs of administering the programs.

Qualifications for the public housing and the HCV programs are determined by the PHAs based on program policies set by HUD and include the total annual gross income, citizenship and immigration status. Income limits are defined and established by HUD as percentages of Area Median Income (AMI) and changed each fiscal year as new AMIs are determined for each county (thus varying by location). Below is the HUD definition of the three categories of low income, for the purposes of the public housing and HCV programs:

- 30 percent of AMI is extremely low income;
- 50 percent of AMI is low income; and
- 80 percent of AMI is lower income.

During the application process, the PHA collects information on family income, assets, and family composition. The PHA then verifies this information with other local agencies, the applicant's employer and bank, and uses the information collected to determine program eligibility and the amount of the housing assistance payment.

If the PHA determines that an applicant is eligible, it will place the applicant's name on a waiting list, unless it is able to assist immediately. Once the applicant's name is reached on the waiting list, the PHA contacts the applicant to offer a lease agreement or a housing voucher. Since the demand for housing assistance often exceeds the limited resources available to HUD and the PHAs, long waiting periods are common.

PG&E CARE and HUD Partnership History

In 2005, the PG&E CARE program partnered with Region IX of HUD to initiate a CARE outreach campaign targeting tenants of public housing and the HCV program (then under the name of Section 8) within PG&E's service area. HUD provided CARE with a contact list of executive directors and property managers of PHAs, which CARE team members then proceeded to contact. The leaders of several PHAs expressed interest and set the framework for enrolling their tenants in the CARE program. The ability to reach out to the tenants of each PHA depended on that PHA's decision to share their customer information with PG&E through a non-disclosure agreement. Approximately 15 percent of the PHAs agreed to participate in this outreach initiative. In each case, a third-party vendor executed the direct mail campaign which consisted of an informative letter from the PHA as well

- as a CARE application. Below are the results of the 2005 Section 8/public housing outreach campaign:
- Applications Mailed: 44,358;
- Applications Received: 8,144; and
- Applications Certified: 6,852.*

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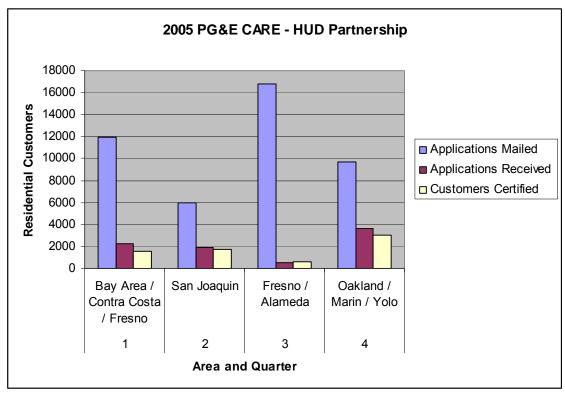
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FIGURE-1
PACIFIC GAS AND ELECTRIC COMPANY



* It is impossible to determine how many of the applications certified in 2005 constituted a "new enrollment" since at that time CARE was not yet tracking the number of new enrollments in the program.

In 2006, the CARE partnership with the PHAs continued, spanning to more counties in PG&E's vast service area. However, fewer PHAs showed interest in partnering with CARE than in the previous year due to the PHAs' growing concern with protecting customer confidentiality. In 2006, CARE began to track separately those applications that constituted "new enrollment" in the program (excluding duplicate applications). Thus, it became evident that outreach to public housing/HCV program tenants resulted in relatively low "new enrollment" results. A high duplication rate prevailed throughout the

year, providing evidence that a significant number of public housing/HCV program tenants were already enrolled in the program. Below are the results of the 2006 public housing/HCV program outreach campaign:

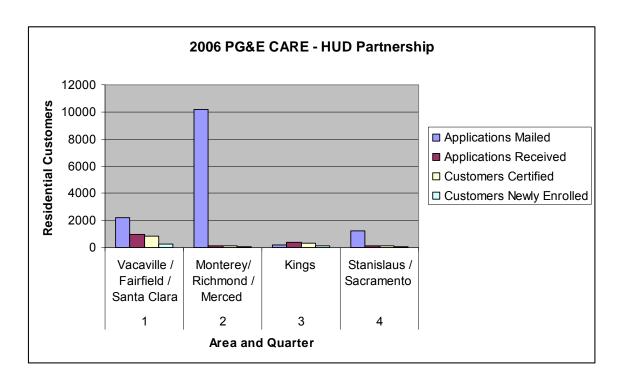
Application Mailed: 13,837;

Applications Received: 1,679;

• Applications Certified: 1,403; and

Applications Newly Enrolled: 475.

FIGURE-2
PACIFIC GAS AND ELECTRIC COMPANY



In 2007, CARE outreach to public housing/HCV program tenants faced major challenges after the first month's direct mail rollout to Santa Clara and San Francisco counties. It became evident that a significant shift had occurred, whereas PHAs were no longer willing to share any customer information with PG&E, leading to a halt of CARE's outreach to public housing/HCV program tenants. Since access to the PHA's customer information could no longer be obtained, PG&E was unable to filter out the residents already receiving the CARE discount. PG&E considered the option of sending a direct mail piece to all tenants without obtaining the housing

authority's customer information in order to filter out the existing CARE customers. However, the cost of sending this direct mail piece to all tenants was cost-prohibitive at the time. Also, duplication rates in 2006 had been high despite having removed many CARE-enrolled customers from the list. Conducting a mailing where none of the CARE-enrolled customers were removed would result in an extremely high cost per new enrollment. Below are the results of the 2007 public housing/HCV program outreach campaign:

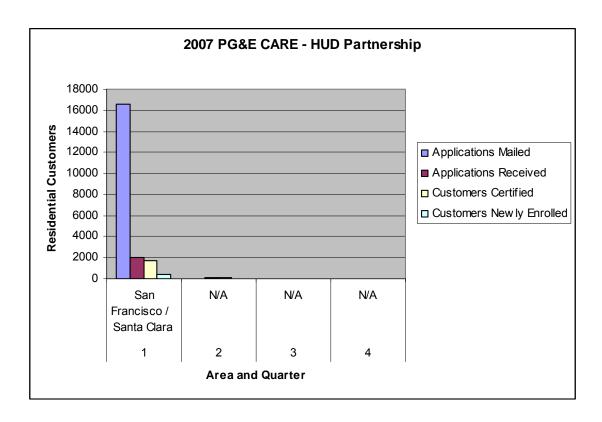
Applications Mailed: 16,625;

Applications Received: 2,175;

Applications Certified: 1,893; and

Applications Newly Enrolled: 436.

FIGURE-3
PACIFIC GAS AND ELECTRIC COMPANY



Further Discussion of Confidentiality Issues

Upon further investigation, we discovered that the high levels of customer information confidentiality exhibited by the PHAs in 2007 stemmed from

HUD's strict adherence to the Privacy Act of 1974 issued by the U.S. Congress. Due to some undisclosed incident that occurred in 2007, HUD increased its monitoring of the PHAs' adherence to this act, which in turn caused the PHAs to stop releasing any information regarding their tenants to the CARE program. The rules of confidentiality also apply to clients who are on the public housing/HCV program waiting list and even to clients who have merely shown an interest and provided their information to a PHA. In order for an exception to be made that would allow automatic qualification and/or enrollment of public housing/HCV program tenants in CARE, a directive from the federal government to HUD would have to be issued (i.e., "Issues of confidentiality do not apply in the case of the CARE program"). HUD would then need to declare to all its participating PHAs that CARE program qualification and/or enrollment would constitute an exception to HUD's confidentiality policy, thus allowing the release of information to PG&E for the purpose of automatically qualifying and/or enrolling public housing/HCV program tenants in CARE. Obtaining a directive from the federal government would require an extensive lobbying process (with no guarantee of eventual success).

Additional Challenges

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If confidentiality issues did not pose a significant obstacle to PG&E retrieving information of the public housing/HCV program tenants, a number of other challenges would have to be overcome in order for PG&E to succeed in automatically qualifying and/or enrolling these tenants in CARE.

All of the tenants in the 30 percent of AMI (extremely low income) category qualify for CARE and can be automatically qualified and/or enrolled in the program. None of the 80 percent of AMI (lower income) category tenants qualify and cannot be automatically qualified and/or enrolled in the program. Thus, the main challenge would be the qualification and/or enrollment of only CARE-eligible public housing/HCV program tenants within the 50 percent of AMI (low income) category. This is due to the fact that AMI varies by county, so in certain counties within PG&E's service area only a portion of public housing/HCV program tenants within this category would be eligible for CARE. If CARE were to automatically qualify and/or enroll all the tenants within this category, it would result in a heavier burden to PG&E

ratepayers who would be paying for a discount for tenants who do not qualify for CARE. This could also compromise the integrity of the program. In order to determine which of the customers within this category are eligible for automatic qualification and/or enrollment by CARE, staff within each PHA would have to administer a process to filter tenants who are CARE-eligible from those who are not. Also, since PHAs vary in terms of both technological capabilities and staffing, PG&E would have to develop an individualized plan of action with each PHA among the 48 counties within PG&E's service area. There would also be a variation in the list formats provided by the PHAs, leading to higher administration costs for PG&E to transform these lists to a format that would allow for the automatic enrollment to take place.

Alternate Proposal

Due to the current challenges in obtaining confidential information from each PHA, as well as other aforementioned issues that would be encountered, the PG&E CARE program would like to propose an alternate plan to enroll public housing/HCV program tenants in the program. CARE proposes an initiative to recruit PHAs to become CARE Community Outreach Contractors (COC). This would allow the CARE program to take a proactive approach to enrolling public housing/HCV program tenants in the program without violating HUD's strict confidentiality policy. PHAs would thus become advocates of the CARE program and would inform current and potential clients about the program. They would also receive a capitation fee for each newly enrolled customer, providing them with an additional incentive. Recruiting PHAs as CARE COCs would also eliminate the need for PG&E to pay the administration costs for receiving duplicate applications (which was the case in all the previous direct mail initiatives with PHAs).

Outreach Plans

PG&E has continued to engage in significant outreach efforts to potential customers, with a special focus on the Hispanic, African American, Asian, Native American, senior, disabled and rural communities. The CARE outreach campaign includes direct mail, grassroots media, community events and partnerships with COCs and public assistance agencies. Successful relationships with these organizations greatly assist in the enrollment of CARE-eligible customers. Also, CARE has enrolled a significant number of

new customers in the program by leveraging with other low-income assistance program within PG&E and via CPUC-authorized automatic enrollment with other utilities.

Direct mail constitutes a primary method of enrolling eligible customers in the CARE program. Over the past year, new company policies requiring the use of recycled paper and soy-based ink were implemented, resulting in higher material costs. This change, combined with higher postage costs, has caused a significant increase in the cost of implementing all direct mail projects.

A bill insert consisting of a mini CARE application is mailed to non-CARE residential customers three times throughout the year. It includes postage-paid return mailing and is in multiple languages. The bill insert presents CARE information in a concise way and allows the customer to fill out a condensed version of the application. This initiative is an efficient outreach tool because of its ability to reach every residential PG&E customer who is not already on CARE. Due to the increased material and postage costs, the cost of the bill insert has significantly increased.

The KEMA Needs Assessment Report released in 2007 recommends that the PG&E CARE program participates in television, radio, and print media for each of its major ethnic markets. CARE plans to partner with television and radio stations to produce commercials targeting the Chinese, Vietnamese and African American customers, thus incurring production and air-time costs with each media outlet. CARE also plans to produce and print advertisements in newspapers and/or magazines targeting each of these ethnic markets.

PG&E plans to continue to improve its successful outreach activities in an effort to meet the CPUC's and PG&E's shared goal of enrolling 100 percent of eligible customers who wish to participate in the CARE program.

VI. Revenue Requirements and Rate Impacts

This section presents the electric revenue and gas CARE funding requirements and cost recovery proposal supporting PG&E's 2009-2011 CARE shortfall and administration-related cost proposal. PG&E proposes to increase its 2009 electric CARE administration revenue requirement by \$1.88 million and to decrease its 2009 gas PPP-CARE administration funding

requirement by \$.85 million. [1] PG&E's proposed CARE administration-related funding requirements for all three program years are presented in Table VI-1 below. The subsequent sections of this testimony address PG&E's proposed 2009-2011 CARE program expenditure budgets, related funding requirements, and cost recovery. Rate and bill impacts are also presented.

TABLE VI-1 PACIFIC GAS AND ELECTRIC COMPANY ELECTRIC REVENUE AND GAS CARE PPP FUNDING REQUIREMENTS FOR 2009-2011 (\$ THOUSANDS)

Line No.	Description	2009	2010	2011	Total
1	Electric Revenue Requirement (including FF&U)	\$7,081	\$7,448	\$7,695	\$22,224
2	Gas CARE PPP Funding Requirement	\$1,752	\$1,843	\$1,904	\$5,499
3	Total	\$8,833	\$9,291	\$9,599	\$27,723

A. Subsidy and Benefit Costs

 The CARE administrative budget includes costs to cover outreach, application processing and enrollment, post-enrollment income verification, system programming, program supervision, regulatory, and other general administrative costs. Approximately 700,000 PG&E CARE program applications are currently processed annually, and PG&E anticipates that this level of activity will continue to increase through the 2009-2011 period. Proposed 2009-2011 CARE administrative-related costs and related rate impacts are detailed below. CARE discounts are available to PG&E's gas and electric customers with income levels not exceeding 200 percent of the FPL. Gas customers are eligible to receive a 20 percent discount on their monthly gas bills. Total electric CARE discounts range from approximately 28 percent for Tier 1 usage to nearly 73 percent for Tier 5 usage (See Schedule E-1, effective May 1, 2008). As detailed in Table VI-2, the CARE subsidy for both gas and electric

^[1] The decrease in the gas PPP-CARE administration funding requirement is due to the change in the electric/gas allocation from 65/35 to 80/20, respectively. See Section VI.B.

customers is forecast in 2009 to be \$461.3 million, an increase of \$2.5 million over the amount currently in rates for 2008.

TABLE VI-2 PACIFIC GAS AND ELECTRIC COMPANY ESTIMATED 2009-2011 CARE SUBSIDY

Line		CARES	Subsidy Forecasts	
No.	Year	Electric	Gas	Total
1	2009	\$370,191,172	\$91,059,479	\$461,250,651
2	2010	\$377,728,580	\$92,386,757	\$470,115,337
3	2011	\$385,437,293	\$94,270,142	\$479,707,435

B. Balancing Account

PG&E proposes to continue the currently adopted methodology for allocating CARE administrative costs between gas and electric customers. Consistent with Decision 89-07-062, PG&E currently allocates the CARE administrative costs between electric and gas in proportion to the discounts received by CARE customers in the previous year. Consequently, for 2009-2011, PG&E will assign 80 percent of the CARE administrative costs to electric customers and 20 percent to gas customers.

Based on the \$27.5 million 3-year CARE administrative cost budget proposed in Section III, PG&E will recover in rates \$22 million of CARE administrative costs, net of franchise fees and uncollectibles (FF&U), in the electric CARE rate components and up to \$5.5 million in the gas PPP-CARE surcharge rates in 2009-2011. This represents an average annual increase of \$1.03 million in forecast CARE administrative costs.

Pursuant to Public Utilities Code section 739.1, PG&E is authorized to record all reasonable administrative costs associated with the implementation of the CARE program. The total amount collected through CARE rates is equal to the sum of forecasted CARE discounts, forecasted CARE administrative costs, and end-of-year forecasted balances in the CARE balancing accounts. CARE rates are equal to the CARE electric revenues and gas surcharges allocated to each applicable

customer class divided by each customer classes adopted sales forecast.[2]

C. Rate and Bill Impacts for CARE Administrative Costs Over the 2009-2011 Period

Approval of PG&E's proposed 2009-2011 CARE Administrative budgets will result in an increase in PG&E's electric PPP charges and a decrease in PG&E's gas PPP charges. PG&E's proposed 2009-2011 electric CARE administrative cost increases among customer classes are shown in Table VI-3 for electric customers and the proposed 2009-2011 gas CARE administrative cost decreases among customer classes are shown in Table VI-4 for PG&E's gas customers, below.

^[2] In addition to CARE sales, sales to Utility Electric Generation and Street lighting customers are exempt from the CARE surcharge.

TABLE VI-3 PACIFIC GAS AND ELECTRIC COMPANY ESTIMATED ELECTRIC RATE IMPACTS FROM 2009-2011 CARE ADMINISTRATIVE PROGRAM REQUEST

Line No.	Electric Customer Class	Dollar Increase in 2009 for CARE Admin (\$000)	Total Percentage Increase in 2009 for CARE Admin	Dollar Increase in 2010 vs. 2009 for CARE Admin (\$000)	Total Percentage Increase in 2010 vs. 2009 for CARE Admin	Dollar Increase in 2011 vs. 2010 for CARE Admin (\$000)	Total Percentage Increase in 2011 vs. 2010 for CARE Admin
1	Bundled Service						
2	Residential	\$731	0.02%	\$855	0.02%	\$938	0.02%
3	Small Light and Power	265	0.02%	309	0.02%	339	0.02%
4	Medium Light and Power	377	0.02%	440	0.02%	482	0.03%
5	E-19 Class	224	0.02%	262	0.03%	287	0.03%
6	Streetlights	0	0.00%	0	0.00%	0	0.00%
7	Standby	6	0.02%	7	0.02%	8	0.03%
8	Agriculture	114	0.02%	133	0.02%	146	0.03%
9	E-20	269	0.02%	314	0.03%	345	0.03%
10	Total Bundled Change	\$1,988	0.02%	\$2,322	0.02%	\$2,545	0.02%
11	Direct Access Service						
12	Residential	\$1	0.03%	\$1	0.04%	\$2	0.04%
13	Small Commercial	2	0.04%	3	0.05%	3	0.05%
14	Medium Commercial	42	0.06%	49	0.07%	54	0.08%
15	Large Commercial	38	0.06%	44	0.07%	49	0.08%
16	Agriculture	1	0.05%	1	0.06%	1	0.06%
17	Industrial	93	0.08%	109	0.10%	120	0.11%
18	Total Direct Access Change	\$178	0.07%	\$207	0.08%	\$227	0.09%

If PG&E's CARE administration cost proposal is adopted, the bill for a typical bill bundled electric customer using 550 kilowatt-hour (kWh) per month will not change. The bill for a typical electric bundled customer using approximately twice the average baseline allowance, or 850 kWh per month, will increase \$0.03 from \$148.44 to \$148.47.

TABLE VI-4 PACIFIC GAS AND ELECTRIC COMPANY ESTIMATED GAS RATE IMPACTS FROM 2009-2011 CARE ADMINISTRATIVE PROGRAM REQUEST

Line No.		2008 Current Revenues	2008 to 2009 Proposed Revenue Change	2008 to 2009 Percent Change	2008 to 2010 Proposed Revenue Change	2008 to 2010 Percent Change	2008 to 2011 Proposed Revenue Change	Percent 2008 to 2011 Change
1	Core Retail – Bundled(a)							
2 3 4 5	Residential Non-CARE Residential CARE Commercial, Small Commercial, Large	\$2,423,961 \$381,971 \$904,826 \$84,268	(366) 0 (153) (17)	(0.02%) 0.00% (0.02%) (0.02%)	(327) 0 (137) (15)	(0.01%) 0.00% (0.02%) (0.02%)	(300) 0 (126) (14)	(0.01%) 0.00% (0.01%) (0.02%)
6	Core Retail – Transportation Only(b)							
7 8 9 10	Residential Non-CARE Residential CARE Commercial, Small Commercial, Large	\$2,365 \$126 \$18,181 \$363	(1) 0 (11) (0)	(0.05%) 0.00% (0.06%) (0.12%)	(1) 0 (10) (0)	(0.04%) 0.00% (0.05%) (0.10%)	(1) 0 (9) (0)	(0.04%) 0.00% (0.05%) (0.10%)
11	Noncore – Transportation Only(b)							
12 13 14 15	Industrial Distribution Industrial Transmission Industrial Backbone Electric Generation – Distribution/Transmission	\$35,595 \$57,900 \$430 \$34,661	(52) (245) (3) 0	(0.15%) (0.42%) (0.66%) 0.00%	(47) (219) (3) 0	(0.13%) (0.38%) (0.59%) 0.00%	(43) (201) (2) 0	(0.12%) (0.35%) (0.54%) 0.00%
16	Electric Gen – Backbone	\$4,268	0	0.00%	0	0.00%	0	0.00%
17	Wholesale – Transportation Only(b)							
18 19 20 21 22	West Coast Gas – Castle West Coast Gas – Mather-D Transmission Level Wholesale NGV, Core Procurement Unbundled Service	\$43 \$45 \$644 \$11,988 \$171,685	0 0 0 0	0.00% 0.00% 0.00% 0.00% 0.00%	0 0 0 0	0.00% 0.00% 0.00% 0.00% 0.00%	0 0 0 0	0.00% 0.00% 0.00% 0.00% 0.00%
23	Total Change	\$4,133,321	(849)	(0.02%)	(758)	(0.02%)	(697)	(0.02%)

⁽a) Bundled core revenues are based on rates that include: (i) an illustrative procurement component that recovers intrastate and interstate backbone transmission charges, storage, brokerage fees and an average annual Weighted Average Cost of Gas (WACOG) of \$0.733 per therm; (ii) a transportation component that recovers customer class charges, customer access charges, CPUC fees, local transmission (where applicable) and distribution costs (where applicable); and (iii) where applicable, a gas public purpose program surcharge that recovers the costs of low income California Alternate Rates for Energy (CARE), low income energy efficiency, customer energy efficiency, Research Development and Demonstration program and BOE/CPUC Admin costs. Actual procurement rate changes monthly.

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typical bundled residential gas customer using 40 therms per month in 2009 will decrease \$0.01 from \$54.74 to \$54.73.

PG&E will incorporate the annual electric CARE revenue requirement authorized in this proceeding into electric rates in the AET with other rate changes effective January 1 of each year in the program budget period, or as soon thereafter as possible. Any required CARE electric rate change resulting from this proceeding will be implemented in accordance

If PG&E's CARE administration cost proposal is adopted, the bill for a

⁽b) Transportation Only revenues are based on rates that include: (i) a transportation component that recovers customer class charges, customer access charges, CPUC fees, local transmission (where applicable) and distribution costs (where applicable); and (ii) where applicable, a gas public purpose program surcharge that recovers the costs of low income California Alternate Rates for Energy (CARE), low income energy efficiency, customer energy efficiency, Research Development and Demonstration program and BOE/CPUC Admin costs. Transportation only customers must arrange for their own gas purchases and transportation to PG&E's cityqate/local transmission system.

with the then-current adopted revenue allocation and rate design methods adopted for the CARE revenue component of electric PPP rates.[3]

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PG&E will incorporate the gas funding requirement authorized in this proceeding into gas rates in the annual gas PPP surcharge advice letter and AGT filings with other rate changes effective January 1 of each year in the program budget period, or as soon thereafter as possible. Similarly, any gas CARE revenue change will be allocated among customer classes consistent with then-currently adopted practice. If a decision is not issued in time for the October 31, 2008 PPP surcharge filing, PG&E requests that the authority to supplement its PPP surcharge advice letter to incorporate changes adopted in this proceeding.

VII. Request to Continue Funding and Allow for Fund Shifting

PG&E's 2009, 2010 and 2011 CARE budgets include anticipated expenditures based on current Commission directives and program parameters, and do not include any expenditures for additional administrative activities that the utilities may be ordered to undertake in the future. Moreover, the uncertainty posed by implementation of any unknown or undefined Commission project could require subsequent revision to the administrative budget if actual utility expenditures exceed the Commission's and PG&E's initial estimates. If actual expenditures for implementing all aspects of CARE administration, including customer outreach, exceed the proposed budget due to an increase in the Commission's initial scope of work, PG&E will seek to be fully compensated for any reasonable increased costs incurred as a result of implementing the Commission's policy. If the Commission should be delayed in issuing a decision on PG&E's 2009-2011 low income programs budget application, PG&E requests interim authorization from the Commission to continue CARE program administration activities into 2009 to avoid any interruption of the CARE program

PG&E also requests flexibility to reallocate funding among budget categories as required to meet CARE goals and objectives. This flexibility and the two-way balancing account afford the utilities the best tools to

^[3] The current methods for setting electric PPP rates, including the CARE surcharge, were adopted in Decision 07-09-004.

efficiently operate the program and achieve the Commission's goal of reaching 100 percent of low-income customers who are eligible for, and desire to participate in, the CARE program. For example, if an information technology project is suspended for any reason and additional marketing is needed in a hard-to-reach area with low CARE penetration, PG&E would be authorized to reallocate funds from IT to Outreach.

VIII. Conclusion

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PG&E respectfully requests that the Commission approve its CARE Program plans and budgets for PY 2009-2011.

PACIFIC GAS AND ELECTRIC COMPANY APPENDICES A THROUGH E

PACIFIC GAS AND ELECTRIC COMPANY APPENDICES A THROUGH E

Appendix A (A Tables)

A-1 A-1 A-2 A-3 A-4 A-5 A-6 A-6-a A-7 A-8 A-9	Total PY 2009-2011 LIEE Proposed Electric & Gas Budget Electric PY 2009-2011 LIEE Proposed Electric & Gas Budget Gas PY 2009-2011 LIEE Proposed Electric & Gas Budget PY 2009-2011 LIEE Planning Assumptions LIEE Program Penetration LIEE Program Detail by Housing Type Summary of LIEE Program Cost Effectiveness LIEE Cost-Effectiveness – Weather Sensitive Measures LIEE Cost-Effectiveness – Weather Sensitive Measures Graphs LIEE Cost-Effectiveness – Non Weather Sensitive Measures PY 2009-2011 LIEE Measurement and Evaluation Studies Summary of PG&E LIEE Program Proposals for 2009, 2010, and 2011
Appendix	B (B Tables)
B-1 B-2 B-3 B-4	PY 2009-2011 CARE Proposed Program Budget PY 2009-2011 CARE Estimated Participation PY 2007-2008 CARE Outreach and Penetration Information Summary of PG&E CARE Program Proposals for 2009, 2010, and 2011
Appendix	C (C Tables)
C-1 C-1 C-2 C-3	PY 2009-2011 CARE and LIEE Rate Impacts – Electric (cents/kWh) PY 2009-2011 CARE and LIEE Rate Impacts – Gas (cents/Therm) PY 2007 Customer Usage PY 2009-2011 Projected Customer Usage and Eligibility
Appendix	D (PIP's)
A-10-1 A-10-2 A-10-3	LIEE Microwaves – Meals on Wheels Program Implementation Plan LIEE Pilot for East Bay Habitat for Humanity PG&E LIEE Leveraging Pilot Project Implementation Plan – City of San José Partnership (Silicon Valley Energy Watch, City of San José Housing Department, and City of San José Strong Neighborhoods)
A-10-4 A-10-5 A-10-6	LIEE Group Energy Education Workshop Project Implementation Plan On-Line (Off-Site) PG&E LIEE/Energy Partners Training Pilot Study City of San Joaquin (Fresno County) Portfolio Implementation Plan – LIEE Pilot Project
A-10-7 A-10-8	LIEE High Efficiency Clothes Washer Pilot Implementation Plan Low Income Energy Efficiency Smart AC Project Implementation Plan

PACIFIC GAS AND ELECTRIC COMPANY APPENDICES A THROUGH E

(Continued)

A-10-9	SmartMeter™ Program – LIEE Education Project
A-10-10	Impact Evaluation of the 2010 Low Income Energy Efficiency (LIEE)
	Program
A-10-11	Process Evaluation of the 2009 LIEE Program
A-10-12	Low Income Non-Energy Benefits Study
A-10-13	LIEE Refrigerator Degradation EUL Study
A-10-14	LIEE Household Segmentation Study
B-5	CARE Recertification and Post-Enrollment Verification Non-Response
	Study

Appendix E (Meeting Notes)

- 1. PG&E PY 2009-2011 Low Income Programs Application Public Input Workshop
- 2. Power Point of 3/13 PG&E application workshop
- 3. CEESP Meeting List

PACIFIC GAS AND ELECTRIC COMPANY APPENDIX A

PY 2009-2011 LIEE Proposed Electric & Gas Budget Pacific Gas and Eletric Company

	-	Authorized			3-	Year Request				
		PY 2008		PY 2009 PY 2010 PY 2011						Y 2009 - 2011
LIEE Program:	_									
Energy Efficiency										
Gas Appliances ¹	\$	6,276,740	\$	9,494,416	\$	13,627,833	\$	14,232,315	\$	37,354,564
Electric Appliances ²	\$	33,485,364	\$	47,139,249	\$	67,462,595	\$	70,025,952	\$	184,627,796
Weatherization ³	\$	13,757,162	\$	20,954,293	\$	29,825,611	\$	30,881,595	\$	81,661,499
Outreach & Assessment / Marketing	\$	5,130,912	\$	979,000	\$	1,399,970	\$	1,456,018	\$	3,834,988
In Home Energy Education/Assesment/Income Eligibility	\$	6,062,112	\$	8,811,000	\$	12,599,730	\$	13,104,160	\$	34,514,890
Education Workshops	\$	400,000	\$	202,500	\$	253,125	\$	303,750	\$	759,375
Pilot ⁴	\$	-	\$	1,269,675	\$	550,800	\$	498,150	\$	2,318,625
NGAT Costs ⁵	\$	-	\$	3,753,832	\$	4,997,229	\$	5,387,167	\$	14,138,228
Energy Efficiency Total	\$	65,112,290	\$	92,603,965	\$	130,716,893	\$	135,889,106	\$	359,209,964
Training Center	\$	371,000	\$	540,176	\$	797,732	\$	829,641	\$	2,167,549
Inspections	\$	3,997,630	\$	4,647,318	\$	5,040,809	\$	5,207,448	\$	14,895,575
Marketing/Outreach	\$	-	\$	1,286,276	\$	1,678,842	\$	1,749,738	\$	4,714,856
M&E ⁶	\$	244,500	\$	366,660	\$	165,000	\$	180,000	\$	711,660
Regulatory Compliance	\$	255,000	\$	255,000	\$	255,000	\$	255,000	\$	765,000
Other Administration ⁷	\$	7,696,080	\$	2,914,405	\$	3,268,525	\$	3,425,866	\$	9,608,796
CPUC Energy Division ⁸	\$	57,000	\$	88,200	\$	88,200	\$	88,200	\$	264,600
REACH PLUS ⁹				\$10,000,000		\$10,000,000		\$10,000,000		\$30,000,000
	•			•		•	•			
TOTAL PROGRAM COSTS	\$			112,702,000			\$	157,625,000	\$	422,338,000
Fun	ded	Outside of LI	EE I	Program Budg	get					

¹Includes: Furnace Repair/Replacement, Water Heater Repair/Replacement, Duct Test & Seal, and a split of 90% for Water Heater Blanket, Faucet Aerators, and Low Flow Showerheads and includes a 10% split for Water Heater Pipe Wrap.

⁴Pilots: Clothes Washer Pilot for 2009, SmartMeter™ starting in 2010, Education On-Line, Microwave Ovens, City of San Joaquin, Habitat for Humanity Pilot.

⁵NGAT Costs have been moved to Energy Efficiency Total. \$2.847M of this request has been authorized by the GRC through 2010, the remaining request is for the increased volume of NGAT work. See Testimony Section V.B.4.

²Includes Refrigerators (including Leveraging), Occupancy Sensors, Central A/C Tune-up, Evaporative Coolers, Room & Window A/C, Central A/C, Torchieres, Interior Hardwire Fixtures, CFL's, Hardwired Porch Lights, Duct Test and Seal, and Clothes Washers in 2010/2011. Includes a split of 10% for Water Heater Blanket, Faucet Aerators, and Low Flow Showerheads and includes a 90% split for Water Heater Pipe Wrap.

³Includes Door Weatherstripping, Attic Access Weatherstripping, Evap Cooler/AC Cover, Caulking, Utility Gasketc, Attic Insulation and Minor Home Repairs.

⁶M&E includes \$180,000 previously approved in D.06-12-038 for the 2008 Impact Study that will be carried over and spent in 2009-2010. \$531,660 is new funding requested for 2009-2011 studies, some of which (for the impact study) will not be spent until 2011-2012. The long-term nature of M&E funding is described in Section VI.C.1.

⁷Includes PG&E Costs such as Smarter Energy Line and Customer Surveys.

⁸ 2009-2011 CPUC Energy Division budget estimate provided by Energy Division by e-mail on May 5, 2008.

⁹An extension of the funding for the REACH PLUS program as approved in Advice Letter 2885-E/E-A on October 4, 2006 is requested as part of the LIEE application in order to provide financial assistance to this targeted customer segment. These costs are not included in the LIEE cost effectiveness analysis.

PY 2009-2011 LIEE Electric Budget Category Comparison Pacific Gas and Electric Company

	Authorized	3-	Year Request					
	PY 2008		PY 2009		PY 2010	PY 2011		Y 2009 - 2011
LIEE Program:								
Energy Efficiency								
- Gas Appliances ¹	\$ -	\$	-	\$	-	\$ -	\$	-
- Electric Appliances ²	\$ 33,485,364	\$	47,139,249	\$	67,462,595	\$ 70,025,952	\$	184,627,796
- Weatherization ³	\$ 3,439,291	\$	3,143,144	\$	4,473,842	\$ 4,632,239	\$	12,249,225
- Outreach & Assessment	\$ 3,591,638	\$	636,350	\$	909,981	\$ 946,412	\$	2,492,742
- In Home Education	\$ 4,243,478	\$	5,727,150	\$	8,189,825	\$ 8,517,704	\$	22,434,678
- Education Workshops	\$ 280,000	\$	131,625	\$	164,531	\$ 197,438	\$	493,594
- Pilot ⁴	\$ -	\$	267,929	\$	159,544	\$ 177,106	\$	604,580
NGAT Costs ⁵	\$ -	\$	-	\$	-	\$ -	\$	-
Energy Efficiency Total	\$ 45,039,771	\$	57,045,447	\$	81,360,318	\$ 84,496,850	\$	222,902,615
Training Center	\$ 259,700	\$	351,114	\$	518,526	\$ 539,267	\$	1,408,907
Inspections	\$ 2,798,341	\$	3,020,757		\$3,276,526	\$ 3,384,841	\$	9,682,124
Marketing	\$ -	\$	836,079		\$1,091,247	\$ 1,137,330	\$	3,064,656
M&E Studies ⁶	\$ 171,150	\$	238,329		\$107,250	\$ 117,000	\$	462,579
Regulatory Compliance	\$ 178,500	\$	165,750		\$165,750	\$ 165,750	\$	497,250
General Administration ⁷	\$ 5,387,256	\$	1,894,363		\$2,124,541	\$ 2,226,813	\$	6,245,717
CPUC Energy Division ⁸	\$ 39,000	\$	57,330		\$57,330	\$ 57,330	\$	171,990
REACH PLUS ⁹	\$ -		\$5,500,000		\$5,500,000	\$5,500,000	\$	16,500,000
TOTAL PROGRAM COSTS	\$ 53,873,718		69,109,170	_	94,201,488	\$ 97,625,181	\$	260,935,839
	Funded (Outs	side of LIEE P	rogi	ram Budget			
	\$ -							

¹Includes: Furnace Repair/Replacement, Water Heater Repair/Replacement, Duct Test & Seal, and a split of 90% for Water Heater Blanket, Faucet Aerators, and Low Flow Showerheads and includes a 10% split for Water Heater Pipe Wrap.

²Includes Refrigerators (including Leveraging), Occupancy Sensors, Central A/C Tune-up, Evaporative Coolers, Room & Window A/C, Central A/C, Torchieres, Interior Hardwire Fixtures, CFL's, Hardwired Porch Lights, Duct Test and Seal, and Clothes Washers in 2010/2011. Includes a split of 10% for Water Heater Blanket, Faucet Aerators, and Low Flow Showerheads and includes a 90% split for Water Heater Pipe Wrap.

³Includes Door Weatherstripping, Attic Access Weatherstripping, Evap Cooler/AC Cover, Caulking, Utility Gasketc, Attic Insulation and Minor Home Repairs.

⁴Pilots: Clothes Washer Pilot for 2009, SmartMeter™ starting in 2010, Education On-Line, Microwave Ovens, City of San Joaquin, Habitat for Humanity Pilot.

⁵NGAT Costs have been moved to Energy Efficiency Total. \$2.847M of this request has been authorized by the GRC through 2010, the remaining request is for the increased volume of NGAT work. See Testimony Section V.B.4.

⁶M&E includes \$180,000 previously approved in D.06-12-038 for the 2008 Impact Study that will be carried over and spent in 2009-2010. \$531,660 is new funding requested for 2009-2011 studies, some of which (for the impact study) will not be spent until 2011-2012. The long-term nature of M&E funding is described in Section VI.C.1.

⁷Includes PG&E Costs such as Smarter Energy Line and Customer Surveys.

⁸ 2009-2011 CPUC Energy Division budget estimate provided by Energy Division by e-mail on May 5, 2008.

⁹An extension of the funding for the REACH PLUS program as approved in Advice Letter 2885-E/E-A on October 4, 2006 is requested as part of the LIEE application in order to provide financial assistance to this targeted customer segment. These costs are not included in the LIEE cost effectiveness analysis.

PY 2009-2011 LIEE Gas Budget Category Comparison Pacific Gas and Electric Company

	Authorized Planned									Year Request
	l '	PY 2008		PY 2009	I	PY 2010		PY 2011		Y 2009 - 2011
LIEE Program:										
Energy Efficiency										
- Gas Appliances ¹	\$	6,276,740	\$	9,494,416	\$	13,627,833	\$	14,232,315	\$	37,354,564
- Electric Appliances ²	\$	-	\$	-	\$		\$	-	\$	-
- Weatherization ³	\$	10,317,872	\$	17,811,149	\$	25,351,769	\$	26,249,355	\$	69,412,274
- Outreach & Assessment	\$	1,539,274	\$	342,650	\$	489,990	\$	509,606	\$	1,342,246
- In Home Education	\$	1,818,634	\$	3,083,850	\$	4,409,906	\$	4,586,456	\$	12,080,211
- Education Workshops	\$	120,000	\$	70,875	\$	88,594	\$	106,313	\$	265,781
- Pilot ⁴	\$	-	\$	1,001,746	\$	391,256	\$	321,044	\$	1,714,045
NGAT Costs ⁵	\$	-	\$	3,753,832	\$	4,997,229	\$	5,387,167	\$	14,138,228
Energy Efficiency Total	\$	20,072,519	\$	35,558,518	\$	49,356,575	\$	51,392,256	\$	136,307,349
Training Center	\$	111,300	\$	189,062	\$	279,206	\$	290,374	\$	758,642
Inspections	\$	1,199,289	\$	1,626,561	\$	1,764,283	\$	1,822,607	\$	5,213,451
Marketing	\$	-	\$	450,197	\$	587,595	\$	612,408	\$	1,650,200
M&E Studies ⁶	\$	73,350	\$	128,331	\$	57,750	\$	63,000	\$	249,081
Regulatory Compliance	\$	76,500	\$	89,250	\$	89,250	\$	89,250	\$	267,750
General Administration ⁷	\$	2,308,824	\$	1,020,042	\$	1,143,984	\$	1,199,053	\$	3,363,079
CPUC Energy Division ⁸	\$	17,100	\$	30,870	\$	30,870	\$	30,870	\$	92,610
REACH PLUS ⁹	\$	-	;	\$4,500,000		\$4,500,000	•,	\$4,500,000	\$	13,500,000
		_		_				_		
TOTAL PROGRAM COSTS	\$	23,858,882	_	43,592,830		, ,	\$	59,999,819	\$	161,402,162
		Funded (Outs	side of LIEE P	rog	ram Budget				

¹Includes: Furnace Repair/Replacement, Water Heater Repair/Replacement, Duct Test & Seal, and a split of 90% for Water Heater Blanket, Faucet Aerators, and Low Flow Showerheads and includes a 10% split for Water Heater Pipe Wrap.

²Includes Refrigerators (including Leveraging), Occupancy Sensors, Central A/C Tune-up, Evaporative Coolers, Room & Window A/C, Central A/C, Torchieres, Interior Hardwire Fixtures, CFL's, Hardwired Porch Lights, Duct Test and Seal, and Clothes Washers in 2010/2011. Includes a split of 10% for Water Heater Blanket, Faucet Aerators, and Low Flow Showerheads and includes a 90% split for Water Heater Pipe Wrap.

³Includes Door Weatherstripping, Attic Access Weatherstripping, Evap Cooler/AC Cover, Caulking, Utility Gasketc, Attic Insulation and Minor Home Repairs.

⁴Pilots: Clothes Washer Pilot for 2009, SmartMeter™ starting in 2010, Education On-Line, Microwave Ovens, City of San Joaquin, Habitat for Humanity Pilot.

⁵NGAT Costs have been moved to Energy Efficiency Total. \$2.847M of this request has been authorized by the GRC through 2010, the remaining request is for the increased volume of NGAT work. See Testimony Section V.B.4.

⁶M&E includes \$180,000 previously approved in D.06-12-038 for the 2008 Impact Study that will be carried over and spent in 2009-2010. \$531,660 is new funding requested for 2009-2011 studies, some of which (for the impact study) will not be spent until 2011-2012. The long-term nature of M&E funding is described in Section VI.C.1.

⁷Includes PG&E Costs such as Smarter Energy Line and Customer Surveys.

⁸ 2009-2011 CPUC Energy Division budget estimate provided by Energy Division by e-mail on May 5, 2008.

⁹An extension of the funding for the REACH PLUS program as approved in Advice Letter 2885-E/E-A on October 4, 2006 is requested as part of the LIEE application in order to provide financial assistance to this targeted customer segment. These costs are not included in the LIEE cost effectiveness analysis.

A	В	С	D	Е	F	G	Н	1	J	K	L	М	N	0	Р	Q	R	S	Т	U	V
1			i.	1			Р	Y 2009 - 201	1 LIEE Plan	nina Assun	nptions	1					•			1	
2							-		as and Elec												
3								raciiic C	as and Lieu	tric Compa	ııy										
					3																
4			P	2007 Actuals					PY 2009 Plann					PY 2010 Plan					PY 2011 Plan		
		Quantity			Therms	Projected	Quantity			Therms	Proposed	Quantity	kWh		Therms	Proposed	Quantity	kWh		Therms	Proposed
5 Measures 1	Units	Installed	kWh (Annual)	kW (Annual)	(Annual)	Expenses	Installed	kWh (Annual	kW (Annual)	(Annual)	Expenses 2	Installed	(Annual)	kW (Annual)	(Annual)	Expenses 2	Installed	(Annual)	kW (Annual)	(Annual)	Expenses 2
6 Heating Systems																					
7 Furnaces Repair & Replacement	Each	2,156	0	0	103,438	\$ 2,538,980	3,005		-	10,146	\$ 3,329,949	4,132	-	-	13,952	\$ 4,809,293	4,132	-		13,952	\$ 5,049,756
8 Cooling Measures																					
9 A/C Replacement - Room	Each	1,059	251,765	390	-	\$ 865,447	1,181	110,241	171	-	\$ 1,134,189	1,626	151,820	235		\$ 1,614,700	1,626	151,820	235	-	\$ 1,671,856
10 A/C Replacement - Central	Each	100	30,774	48	-	\$ 222,718	139	20,071	31	-	\$ 315,252	191	27,995	43		\$ 454,847	191	27,995	43	-	\$ 477,590
11 A/C Tune-up - Central	Each	664	133,978	173	-	\$ 161,542	6,121	831,361	1,289	-	\$ 2,164,032	8,418	1,143,249	1,772	-	\$ 3,094,532	8,418	1,143,249	1,772	-	\$ 3,218,317
12 A/C Services - Central	Each																				
13 Heat Pump	Each																				
14 Evaporative Coolers	Each	2,059	785,511	1,218	-	\$ 1,456,827	1,579	300,068	190	-	\$ 1,305,827	2,168	411,767	261	-	\$ 1,857,987	2,168	411,767	261	-	\$ 1,923,751
15 Evaporative Cooler Maintenance	Each																				
16 Infiltration & Space Conditioning																					
17 Envelope and Air Sealing Measures	Home	176,594	460,066	83	474,503	\$14,795,383	46,434	-	-	353,535	\$ 13,619,850	63,850	-	-	486,151	\$ 19,385,530	63,850	-	-	486,151	\$ 20,071,896
18 Duct Sealing	Home	1,704	4,307	20	10,508	\$ 1,193,555	2,152	168,026	30	54,151	\$ 1,615,802	2,959	231,244	42	74,445	\$ 2,310,653	2,959	231,244	42	74,445	\$ 2,403,092
19 Attic Insulation	Home	3,781	116,937	21	156,842	\$ 3,458,824	4,299	-	-	213,891	\$ 5,215,470	5,913	-	-	294,152	\$ 7,424,008	5,913	-	-	294,152	\$ 7,686,841
20 Water Heating Measures	•																	•			
21 Water Heater Conservation Measures	Home	77,859	287,641	43	457,935	\$ 2,247,533	53,808	-	-	688,697	\$ 2,616,049	73,987	-	-	946,965	\$ 3,723,095	73,987	-	-	946,965	\$ 3,854,775
22 Water Heater Replacement - Gas	Each	268	-	-	5,073	\$ 1,082,412	1,803	-	-	21,816	\$ 1,502,031	2,480	-	-	30,008	\$ 2,169,446	2,480	-	-	30,008	\$ 2,277,912
23 Water Heater Replacement - Electric	Each											1									
24 Tankless Water Heater - Gas	Each					\$ 41,302						1									
25 Tankless Water Heater - Electric	Each											1									
26 Lighting Measures	•					•											•	•			
27 CFLs	Each	391,129	8,431,301	1,005	-	\$ 3,939,774	503,200	8,051,200	998	-	\$ 5,947,824	691,900	11,070,400	1,373	-	\$ 8,468,856	691,900	11,070,400	1,373	-	\$ 8,766,373
28 Ext. Porchlights Fixture Replacement	Each	34.348	1,222,743	-		\$ 2.643.465	30,763	492,208	61	-	\$ 2,409,358	42.299	676,784	84	-	\$ 3,429,180	42.299	676,784	84	-	\$ 3,550,578
29 Interior Hard wired CFL Fixtures	Each	40,606	2,809,204	348		\$ 3,128,900	52,360	2,978,394	369	-	\$ 4,100,835	71,995	4,095,292	508	-	\$ 5,836,635	71.995	4,095,292	508	-	\$ 6,043,260
30 Refrigerators			,,,,,,										,,,,,								
31 Refrigerators	Each	17.230	13.019.962	2.060	-	\$15,597,756	22,440	16.882.685	3.022	-	\$ 22.548.610	30.855	23,213,691	4.155		\$ 32,094,137	30.855	23.213.691	4.155	-	\$ 33,230,526
32 Pool Pumps	•																				
33 Pool Pumps	Each																				
34 New Measures	•					•											•	•			
35 Torchieres	Each		l				6,800	1,386,445	172	-	\$ 602,888	9,350	1,906,362	236	-	\$ 858,143	9,350	1,906,362	236	-	\$ 888,531
36 Occupancy Sensor	Each		i			Ì	4,080	872,141	108	-	\$ 372,749	5,610	1,199,194	149	-	\$ 530,538	5,610	1,199,194	149	-	\$ 549,331
37 Pilots																					***
38 Clothes Washer	Each					1	1,000	287,890	52	17,350	\$ 750,000	1,250	359,863	64	21,688	\$ 975,000	1,500	431,835	77	26,025	\$ 1,216,800
39 Microwave	Each					Ì	1,500	131,400	10	42,924	\$ 90,000	1,500	131,400	10	42,924	\$ 90,000	2,000	175,200	14	57,232	\$ 120,000
40 Ceiling Fans	Each	1,185	-	-	-	\$ 203,524															
41	Each		i															ĺ		i	
42 Customer Enrollment																		•			
43 Outreach & Assessment	Home	63,319	l			\$11,105,234	80,000				\$ 8,910,000	110,000				\$ 12,741,300	110,000			ı	\$ 13,251,398
44 In-Home Education	Home	,				1	,										1				
45 Education Workshops	Participant																1				
46				· ·								•				1	•	•			
47 Total			27,554,191	5,410	1,208,300	\$64,683,176		32,512,129	6,504	1,402,511	\$ 78,550,715		44,619,059	8,933	1,910,284	\$ 111,867,879		44,734,832	8,949	1,928,930	\$ 116,252,582
48																					

LIEE Program Penetration Pacific Gas and Electric Company

	Number of Residential Customers in Utility Service Area ¹	Number of Eligible and Willing LIEE Customers ²	Number of Treated LIEE Customers Since 2002 ³	Number of Eligible and Willing Customers Remaining to be Treated ⁴	Customers Treated by LIEE in Program Year	Percent of LIEE Programmatic Initiative Achieved
PY 2007	6,137,507	1,681,738	290,153		63,319	
PY 2008	6,191,516	1,604,345	353,472		58,200	
PY 2009	6,191,516	1,604,345	411,672	1,192,673	80,000	7%
PY 2010	6,191,516	1,604,345	491,672	1,192,673	110,000	16%
PY 2011	6,191,516	1,604,345	601,672	1,192,673	110,000	25%

¹ Numbers of Residential Customers in Utility Service Area and Eligible Low Income Customers will fluctuate based on annually updated eligibility information.

² Number of eligible and willing LIEE customers is based on utility's proposed "standard means of deriving the number of LIEE customers on which to base 1/4 of the Commission's programmatic initiative," as discussed in Section III of utility budget application. This is the number of PG&E customers estimated to be eligible for LIEE, minus a 10% unwillingness factor (from KEMA 2007 Low Income Needs Assessment Study). Estimated-eligible customers are derived from census data. In 2007, 1,868,598 customers were estimated eligible. Ir 2008, 1,782,605 were estimated eligible. The 2008 estimate was used for 2009-2011.

³ This amount includes the number of customers treated and projected to be treated begining January 2002 through the beginning of each Program Year

⁴ PG&E's method for estimating eligible and willing customers is described in Section III of PG&E's LIEE 2009-2011 program testimony, and includes: (Estimated eligible) - (10%) - (LIEE-treated since 2002) - (LIHEAP-treated since 2002) - (Estmated Treated for 2008, both LIHEAP and LIEE).

	LIEE Pro	gram Detail	by Housing	Туре									
		Gas and Ele											
	PY 2007	PY 2007	PY 2008	PY 2009	PY 2010	PY 2011							
	Customers												
	Estimated	Customers	Cu	stomore Tra	ated (Project	ad) ²							
	Eligible for	Treated	Cu	Stomers ried	ateu (Frojecti	eu <i>j</i>							
	LIEE ¹												
Gas and Electric Customers													
Owners - Total	300,487	23,602	10,144	13,944	19,173	19,173							
Single Family	246,251	19,972	8,313	11,427	15,713	15,713							
Multi Family	16,725	520	565	776	1,067	1,067							
Mobile Homes	37,511	3,110	1,266	1,741	2,393	2,393							
Renters - Total	502,861	23,251	16,976	23,334	32,085	32,085							
Single Family	150,972	12,952	5,097	7,006	9,633	9,633							
Multi Family	339,349	10,007	11,456	15,746	21,652	21,652							
Mobile Homes	12,540	292	423	582	800	800							
Electric Customers (only)													
Owners - Total	186,150	4,052	6,284	8,639	11,878	11,878							
Single Family	143,371	2,647	4,840	6,653	9,148	9,148							
Multi Family	6,973	142	235	324	445	445							
Mobile Homes	35,806	1,263	1,209	1,662	2,285	2,285							
Renters - Total	265,549	4,782	8,965	12,322	16,943	16,943							
Single Family	89,781	2,295	3,031	4,166	5,728	5,728							
Multi Family	162,885	2,113	5,499	7,558	10,393	10,393							
Mobile Homes	12,883	374	435	598	822	822							
Gas Customers (only)													
Owners - Total	160,719	3,682	5,425	7,458	10,254	10,254							
Single Family	130,761	2,490	4,414	6,068	8,343	8,343							
Multi Family	9,359	12	316	434	597	597							
Mobile Homes	Mobile Homes 20,599 1,180 695 956 1,314 1,314												
Renters - Total	308,243	3,950	10,406	14,303	19,667	19,667							
Single Family	86,016	1,883	2,904	3,991	5,488	5,488							
Multi Family	216,117	2,026	7,296	10,028	13,789	13,789							
Mobile Homes	6,110	41	206	284	390	390							

¹The number of 2007 PG&E customers estimated to be eligible for the LIEE program in these categories is calculated from PUMS (Public Use Microdata Sample) data. The PUMS-to-utility territory correspondence was based on Census-derived PUMA-to-blockgroup data.

²These numbers are calculated projections based on the percentage of each line item to the number of LIEE estimated eligible customers, and then applied to the total number of homes that were estimated to be treated in each year. PG&E's 2009-2011 LIEE program does not project LIEE targets at this micro-level of segmentation.

12

	А	В	С	D		
1	Summary of LIEE Program Cost Effectiveness					
2	Pacific Gas and Electric Company					
3						
4	Ratio of Program Benefits over Program Costs ²					
5		Utility Cost Test	Modified Participant Test	Total Resource Cost Test		
6	PY 2008 ¹	0.46	0.63	0.36		
7	PY 2009	0.46	0.49	0.37		
8	PY 2010	0.45	0.50	0.36		
9	PY 2011	0.44	0.50	0.34		
10	¹ These forecasted values for 2008 are based on 2007 actuals					
11	² The Utility Cost Test (UCT) and Modified Participant Cost Test (PC _m) both include NEBs and were adopted for LIEE in D.02-08-034. The TRC is included for information purposes only, as specified in the ACR Providing Guidance for LIEE 2009-2011 Budget Applications, dated 4/01/08. Cost Benefit tests are described in this 2009-2011 LIEE testimony, Section IV.A.					

	A	В	С	D	
1	LIEE Cost-Effectivenes		_	_	
2	Pacific Gas and Electric Company				
3	racine das and Electric Company				
4	Ratio of Benefits Over Costs [1]				
4					
_	Measure	Utility Cost Test	-	Total Resource Cost	
5		[2]	Test [2]	Test [2]	
6	NOT 0 1 1 (7 11) 05	0.00	0.70		
	A/C Tune-up - Central (Zone 11) SF	0.83	0.76	0.66	
	A/C Tune-up - Central (Zone 13) SF	0.83	0.83	0.64	
	Attic Insulation - Gas SH (Zone 1) SF Duct Sealing - Gas SH & AC (Zone 16) MH	0.82 0.78	0.95 0.71	0.59 0.56	
	A/C Tune-up - Central (Zone 11) MH	0.75	0.52	0.50	
	A/C Tune-up - Central (Zone 13) MH	0.74	0.58	0.59	
	Duct Sealing - Gas SH & AC (Zone 16) SF	0.70	0.65	0.52	
	A/C Tune-up - Central (Zone 13) MF	0.67	0.66	0.54	
	A/C Tune-up - Central (Zone 12) SF	0.67	0.60	0.55	
	A/C Tune-up - Central (Zone 11) MF	0.66	0.58	0.55	
	Attic Insulation - Gas SH (Zone 16) SF	0.66	0.78	0.49	
18	Duct Sealing - Gas SH & AC (Zone 13) SF	0.65	0.61	0.48	
	Attic Insulation - Gas SH (Zone 2) SF	0.65	0.77	0.49	
20	Duct Sealing - Gas SH & AC (Zone 5) MH	0.64	0.60	0.48	
	Duct Sealing - Gas SH & AC (Zone 11) SF	0.63	0.59	0.47	
	Duct Sealing - Gas SH & AC (Zone 12) SF	0.63	0.59	0.47	
	Duct Sealing - Gas SH & AC (Zone 5) SF	0.61	0.57	0.46	
	A/C Tune-up - Central (Zone 12) MH	0.61	0.43	0.51	
	Duct Sealing - Gas SH & AC (Zone 2) SF	0.61	0.57	0.46	
	Duct Sealing - Gas SH & AC (Zone 2) MH	0.60	0.56	0.45	
	Attic Insulation - Gas SH (Zone 11) SF	0.59	0.70	0.45	
	Attic Insulation - Gas SH (Zone 3) SF	0.57	0.68	0.43	
	Duct Sealing - Gas SH & AC (Zone 13) MH Attic Insulation - Gas SH (Zone 12) SF	0.57 0.55	0.53 0.66	0.43 0.42	
	Duct Sealing - Gas SH & AC (Zone 12) MH	0.55	0.52	0.42	
	Duct Sealing - Gas SH & AC (Zone 12) WIT	0.55	0.52	0.42	
	A/C Tune-up - Central (Zone 16) SF	0.54	0.45	0.46	
	Duct Sealing - Gas SH & AC (Zone 1) MH	0.54	0.50	0.41	
	Attic Insulation - Gas SH (Zone 4) SF	0.53	0.63	0.40	
	Duct Sealing - Gas SH & AC (Zone 4) SF	0.52	0.49	0.40	
	Duct Sealing - Gas SH & AC (Zone 11) MH	0.52	0.49	0.39	
	Attic Insulation - Gas SH (Zone 13) SF	0.50	0.59	0.38	
	Air Slg/Envelope (Zone 13) MH	0.44	0.53	0.34	
40					
	A/C Tune-up - Central (Zone 16) MH	0.49	0.31	0.42	
	Duct Sealing - Gas SH & AC (Zone 1) SF	0.49	0.46	0.38	
	Evaporative Coolers (Zone 16) SF	0.46	0.36	0.37	
	Duct Sealing - Gas SH & AC (Zone 3) MH	0.45	0.43	0.35	
	A/C Tune-up - Central (Zone 12) MF	0.44	0.37	0.37	
	Evaporative Coolers (Zone 13) SF	0.43	0.37	0.35	
	Evaporative Coolers (Zone 13) MH	0.42	0.46	0.34	
	A/C Tune-up - Central (Zone 4) SF Air Slg/Envelope (Zone 12) MH	0.41 0.40	0.37 0.49	0.34 0.32	
	Duct Sealing - Gas SH & AC (Zone 4) MH	0.40	0.49	0.32	
	Air SIg/Envelope (Zone 16) MH	0.40	0.45	0.29	
	A/C Tune-up - Central (Zone 16) MF	0.37	0.43	0.29	
	Evaporative Coolers (Zone 16) MH	0.36	0.36	0.30	
	A/C Tune-up - Central (Zone 4) MH	0.35	0.24	0.30	
	Air Slg/Envelope (Zone 13) SF	0.33	0.40	0.26	
	A/C Replacement - Room (Zone 13) SF	0.33	0.28	0.28	
	Air Slg/Envelope (Zone 12) SF	0.32	0.38	0.25	
				•	

	A	В	С	D	
1	LIEE Cost-Effectiveness - Weather Sensitive Measures				
2	Pacific Gas and Electric Company				
3					
4	Ratio of Benefits Over Costs [1]				
		Utility Cost Test		Total Resource Cost	
5	Measure	[2]	Test [2]	Test [2]	
58	A/C Tune-up - Central (Zone 2) MH	0.31	0.20	0.27	
	A/C Tune-up - Central (Zone 2) SF	0.30	0.25	0.26	
	A/C Replacement - Room (Zone 16) SF	0.30	0.21	0.27	
61	Attic Insulation - Gas SH (Zone 2) MF	0.30	0.36	0.24	
	Evaporative Coolers (Zone 11) MH	0.29	0.29	0.24	
	A/C Replacement - Room (Zone 13) MH	0.29	0.24	0.25	
	Air Slg/Envelope (Zone 16) SF	0.28	0.34	0.22	
	Attic Insulation - Gas SH (Zone 3) MF	0.27	0.33	0.22	
	A/C Replacement - Central (Zone 13) MH	0.27	0.23	0.24	
	A/C Replacement - Central (Zone 13) SF	0.27	0.22	0.23	
	Evaporative Coolers (Zone 12) MH	0.27	0.27	0.22	
	A/C Replacement - Central (Zone 13) MF	0.27	0.22	0.23	
	Air Slg/Envelope (Zone 1) MH	0.26	0.31	0.21	
	Evaporative Coolers (Zone 12) SF	0.26	0.20	0.21	
	Attic Insulation - Gas SH (Zone 4) MF Attic Insulation - Gas SH (Zone 5) MF	0.25 0.25	0.31	0.20 0.20	
	A/C Tune-up - Central (Zone 4) MF	0.25	0.31	0.20	
	Evaporative Coolers (Zone 11) SF	0.23	0.18	0.20	
	Air SIg/Envelope (Zone 4) MH	0.24	0.18	0.20	
	Attic Insulation - Gas SH (Zone 12) MF	0.23	0.28	0.19	
	A/C Replacement - Room (Zone 16) MH	0.23	0.16	0.13	
	A/C Tune-up - Central (Zone 2) MF	0.23	0.18	0.20	
	A/C Replacement - Central (Zone 11) MH	0.23	0.16	0.20	
	A/C Replacement - Central (Zone 11) SF	0.22	0.16	0.20	
	Air Slg/Envelope (Zone 11) MH	0.22	0.26	0.17	
	Attic Insulation - Gas SH (Zone 13) MF	0.22	0.26	0.17	
84	A/C Replacement - Room (Zone 11) SF	0.20	0.14	0.18	
85	A/C Replacement - Central (Zone12) MH	0.20	0.15	0.18	
	Duct Sealing - Gas SH & AC (Zone 13) MF	0.20	0.20	0.16	
	Evaporative Coolers (Zone 13) MF	0.20	0.21	0.16	
	A/C Replacement - Room (Zone 11) MH	0.19	0.14	0.17	
	Air Slg/Envelope (Zone 2) MH	0.19	0.24	0.16	
	Air Slg/Envelope (Zone 1) SF	0.19	0.24	0.16	
	Air Slg/Envelope (Zone 4) SF	0.19	0.24	0.16	
	A/C Replacement - Central (Zone12) SF	0.19	0.14	0.17	
	A/C Replacement - Central (Zone 16) SF	0.19	0.13	0.17	
	A/C Replacement - Central (Zone 11) MF Duct Sealing - Gas SH & AC (Zone 11) MF	0.19	0.13 0.17	0.17 0.14	
	A/C Replacement - Room (Zone 12) SF	0.18 0.18	0.17	0.14	
	A/C Replacement - Room (Zone 12) SF A/C Replacement - Room (Zone 12) MH	0.18	0.13	0.16	
	Air Slg/Envelope (Zone 11) SF	0.17	0.12	0.15	
	Air SIg/Envelope (Zone 2) SF	0.17	0.18	0.14	
	Evaporative Coolers (Zone 11) MF	0.15	0.10	0.12	
	Air Slg/Envelope (Zone 12) MF	0.13	0.15	0.10	
	Air Slg/Envelope (Zone 13) MF	0.13	0.15	0.10	
	A/C Replacement - Central (Zone12) MF	0.12	0.09	0.11	
	Duct Sealing - Gas SH & AC (Zone 12) MF	0.12	0.11	0.10	
	Duct Sealing - Gas SH & AC (Zone 16) MF	0.11	0.11	0.09	
106	A/C Replacement - Room (Zone 13) MF	0.11	0.09	0.09	
107	Air Slg/Envelope (Zone 16) MF	0.10	0.12	0.08	
	A/C Tune-up - Central (Zone 3) SF	0.09	0.10	0.08	
109	A/C Tune-up - Central (Zone 3) MH	0.08	0.07	0.07	

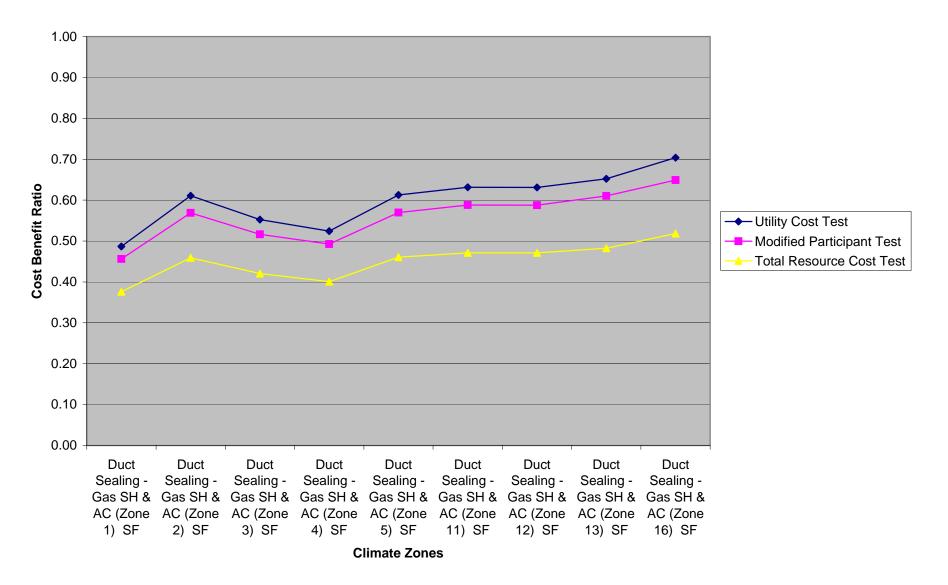
	A	В	С	D		
1	LIEE Cost-Effectivenes	s - Weather Ser	sitive Measures			
2	Pacific Gas and Electric Company					
3	i domo Gas a	na Electric Con	ipany			
4		Datio of Paradita Over Coata [4]				
4		Ratio of Benefits Over Costs [1] Utility Cost Test Modified Participant Total Resource Cost				
_	Measure	Utility Cost Test	Modified Participant			
5	1/0 - 0 - 1/7 - 0 - 0	[2]	Test [2]	Test [2]		
	A/C Tune-up - Central (Zone 5) SF	0.08	0.07	0.07		
	A/C Replacement - Central (Zone 2) MH	0.08	0.06	0.07		
	A/C Replacement - Central (Zone 2) SF	0.08	0.06	0.07		
	Air Slg/Envelope (Zone 3) MH Air Slg/Envelope (Zone 4) MF	0.08 0.08	0.09	0.06		
	Air Sig/Envelope (Zone 1) MF	0.08	0.09	0.06		
	A/C Replacement - Room (Zone 11) MF	0.06	0.09	0.06		
	Duct Sealing - Gas SH & AC (Zone 2) MF	0.07	0.03	0.07		
	Duct Sealing - Gas SH & AC (Zone 4) MF Duct Sealing - Gas SH & AC (Zone 4) MF	0.07	0.07	0.06		
	A/C Tune-up - Central (Zone 5) MH	0.07	0.07	0.06		
	Htg Sys Repair/Replace - Gas SH (Zone 1) SF	0.07	0.08	0.06		
	A/C Replacement - Central (Zone 2) MF	0.06	0.04	0.05		
	Air Slg/Envelope (Zone 11) MF	0.05	0.06	0.04		
	Air Slg/Envelope (Zone 3) SF	0.05	0.06	0.04		
	Air Slg/Envelope (Zone 2) MF	0.05	0.06	0.04		
	A/C Tune-up - Central (Zone 1) MH	0.05	0.03	0.05		
	A/C Tune-up - Central (Zone 1) SF	0.05	0.04	0.05		
	Htg Sys Repair/Replace - Gas SH (Zone 2) SF	0.05	0.06	0.04		
	Evaporative Coolers (Zone 2) MH	0.05	0.05	0.04		
129	Duct Sealing - Gas SH & AC (Zone 3) MF	0.05	0.04	0.04		
130	Duct Sealing - Gas SH & AC (Zone 5) MF	0.05	0.04	0.04		
	A/C Replacement - Central (Zone 4) MF	0.05	0.03	0.04		
	A/C Tune-up - Central (Zone 3) MF	0.04	0.05	0.04		
	A/C Replacement - Room (Zone 12) MF	0.04	0.03	0.04		
	Htg Sys Repair/Replace - Gas SH (Zone 11) SF	0.04	0.05	0.04		
	Htg Sys Repair/Replace - Gas SH (Zone 3) SF	0.04	0.05	0.03		
	Htg Sys Repair/Replace - Gas SH (Zone 16) SF	0.04	0.05	0.03		
	Htg Sys Repair/Replace - Gas SH (Zone 12) SF	0.04	0.05	0.03		
	Htg Sys Repair/Replace - Gas SH (Zone 4) SF	0.04	0.04	0.03		
	A/C Replacement - Central (Zone 4) MH	0.04	0.03	0.03		
	A/C Replacement - Central (Zone 4) SF	0.04	0.03	0.03		
	A/C Tune-up - Central (Zone 5) MF	0.03	0.03	0.03		
	A/C Tune-up - Central (Zone 1) MF	0.03	0.02	0.03		
	Htg Sys Repair/Replace - Gas SH (Zone 13) SF	0.03	0.04	0.03		
	Duct Sealing - Gas SH & AC (Zone 1) MF	0.03	0.03	0.03		
	Air Slg/Envelope (Zone 3) MF A/C Replacement - Central (Zone 3) MH	0.03 0.01	0.03	0.02		
	A/C Replacement - Central (Zone 3) MH A/C Replacement - Central (Zone 3) SF	0.01	0.01	0.01		
	A/C Replacement - Central (Zone 3) MF	0.01	0.01	0.01		
	A/C Replacement - Central (Zone 5) MF A/C Replacement - Central (Zone 5) SF	0.00	0.00	0.00		
	A/C Replacement - Central (Zone 5) MF	0.00	0.00	0.00		
151	700 Replacement Contrar (2010 0) Wil	0.00	0.00	0.00		
151						

^{*} NOTE: No measures have a cost-benefit ratio over 1.0. Pink line demarcates measures with cost effectiveness over 0.5. Measures highlighted in green are included in PG&E's 2009-2011 LIEE program. Measures highlighted in yellow are included 152 in PG&E's 2009-2011 LIEE program based on usage, comfort, health and safety.

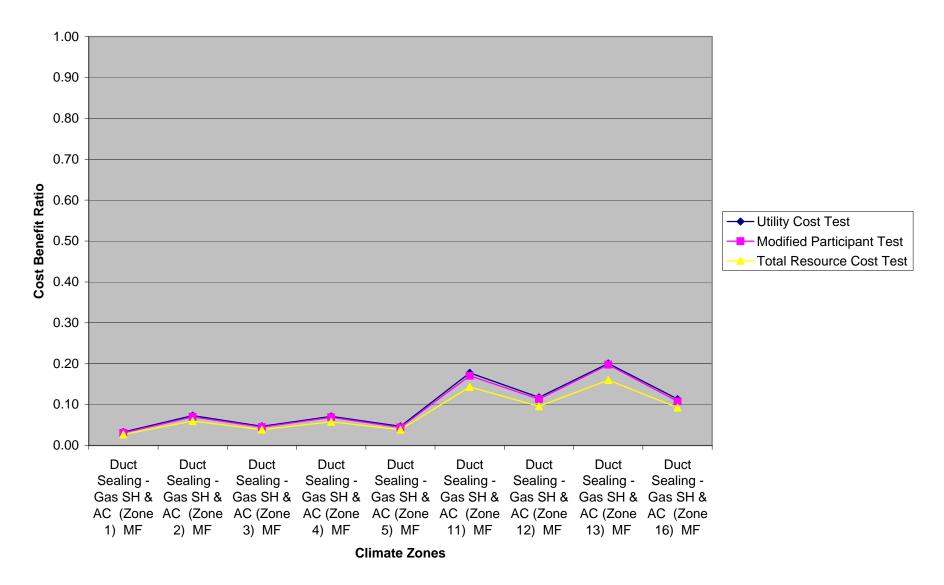
¹⁵³ Based on 2010 program year

² The Utility Cost Test (UCT) and Modified Participant Cost Test (PC_m) both include NEBs and were adopted for LIEE in D.02-08-034. The TRC is included for information purposes only, as specified in the ACR Providing Guidance for LIEE 2009-2011 Budget Applications, dated 4/01/08. Cost Benefit tests are described in this 2009-2011 LIEE testimony, Section IV.A.

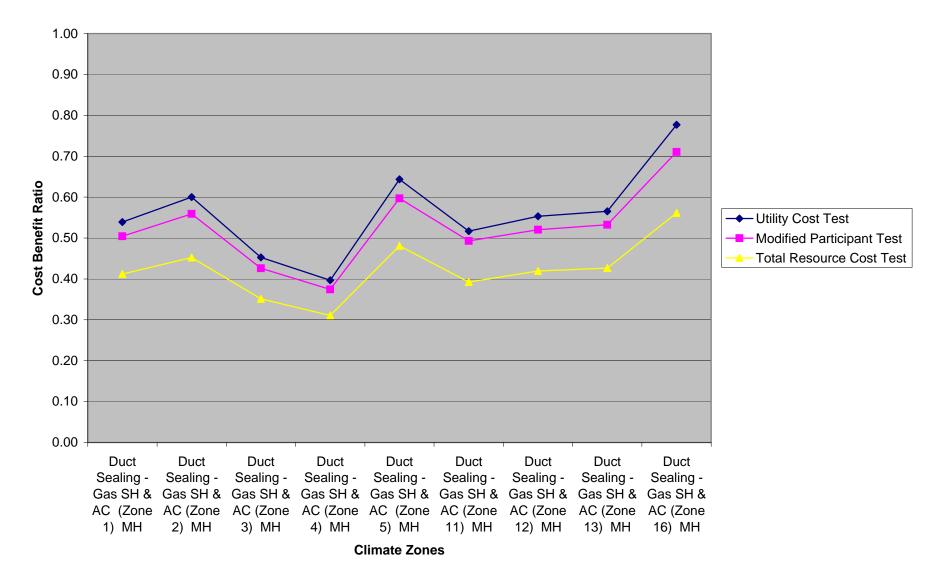
Duct Sealing - Gas SH & AC - SF



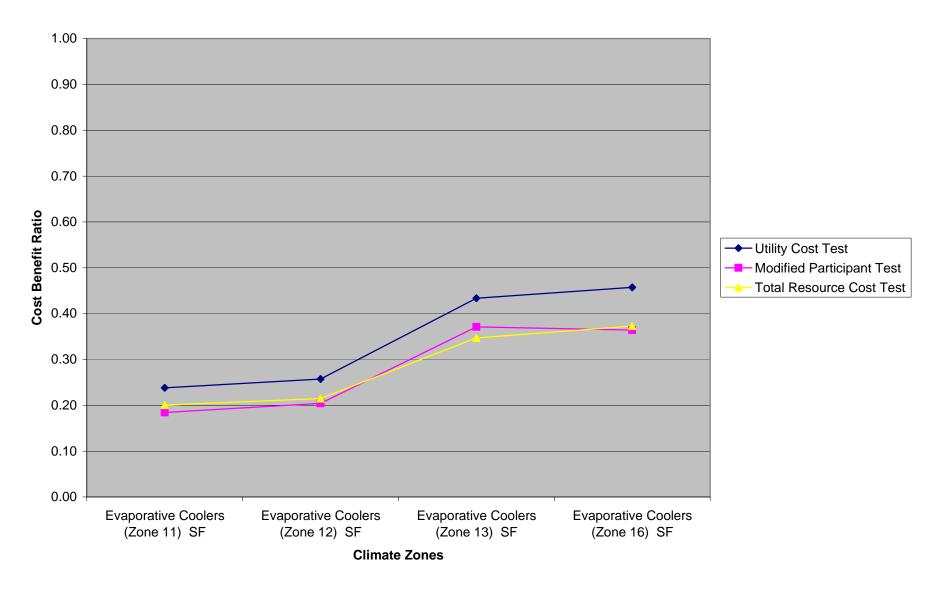
Duct Sealing - Gas SH & AC - MF



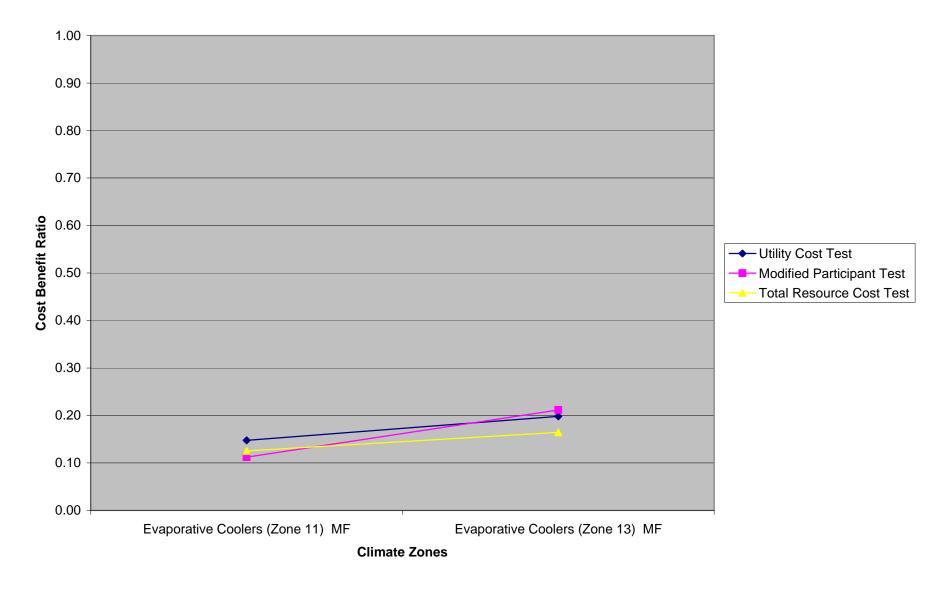
Duct Sealing - Gas SH & AC - MH



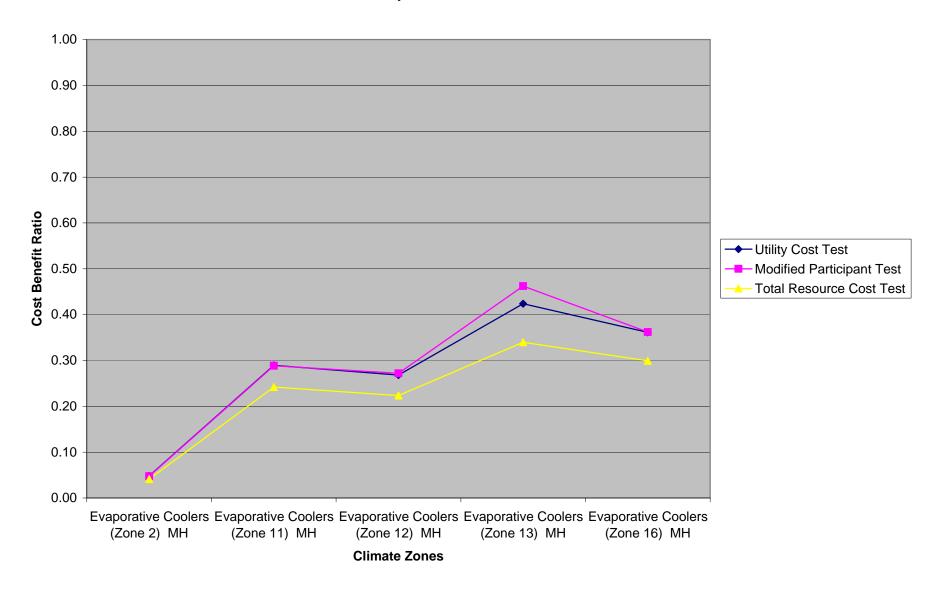
Evaporative Coolers - SF



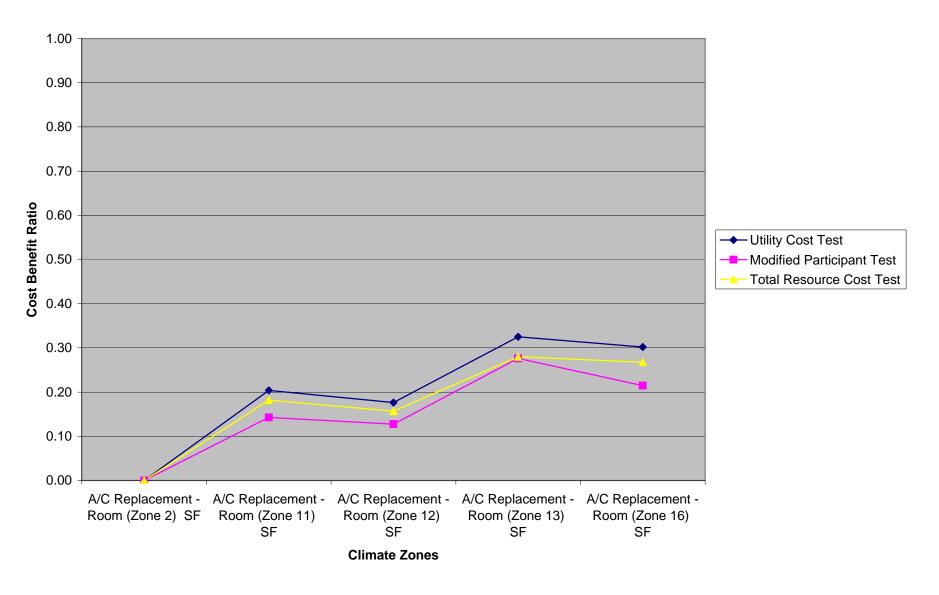
Evaporative Coolers - MF



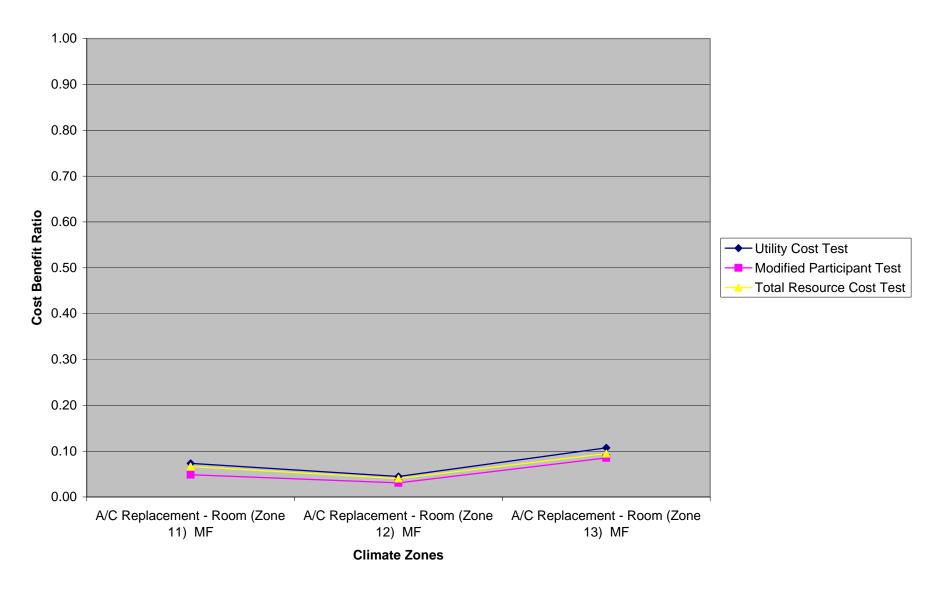
Evaporative Coolers - MH



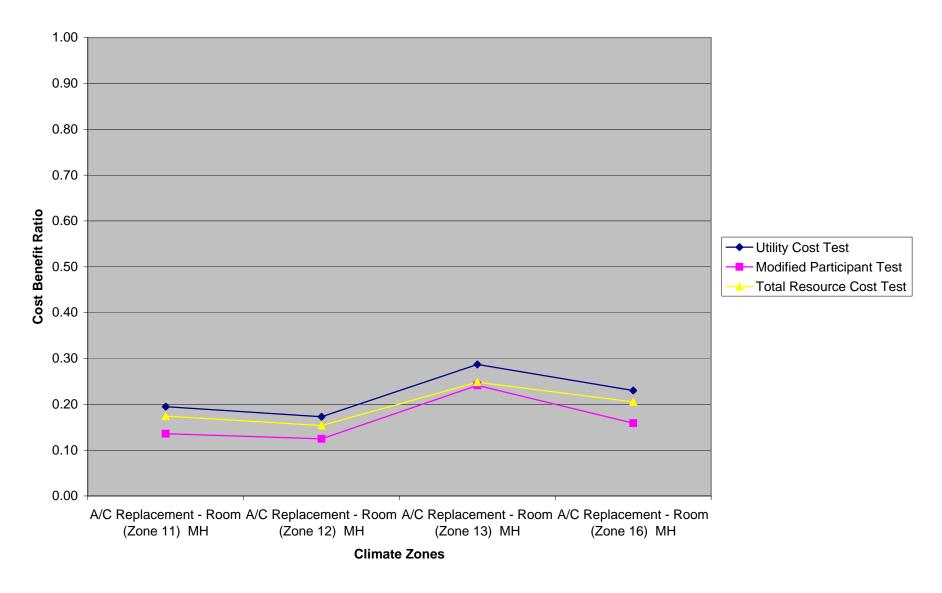
A/C Replacement - Room - SF



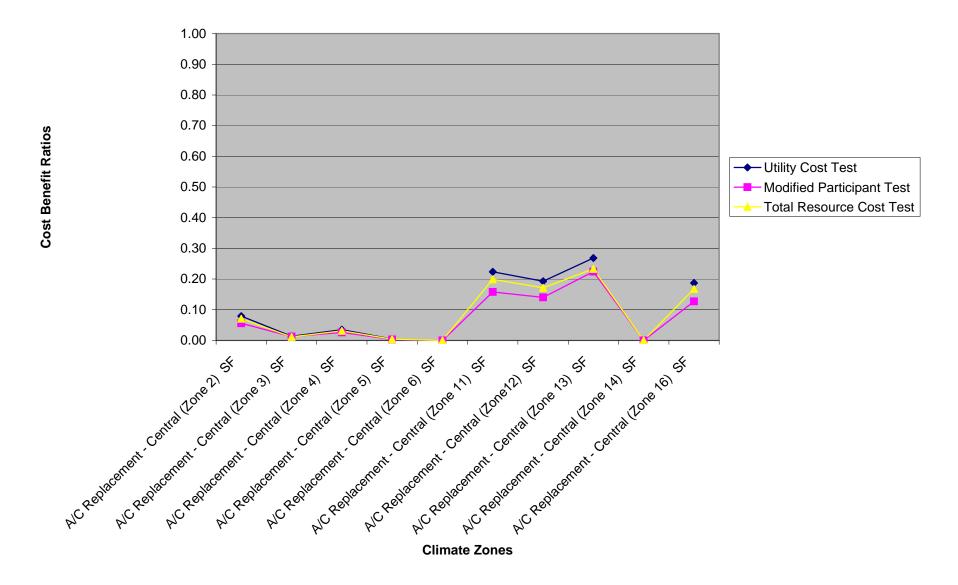
A/C Replacement - Room - MF



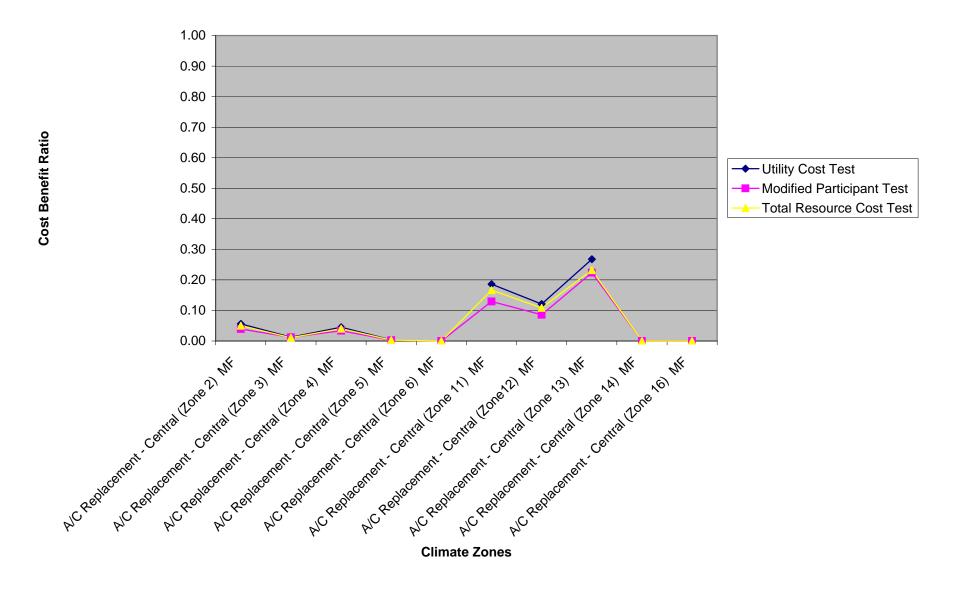
A/C Replacement - Room - MH



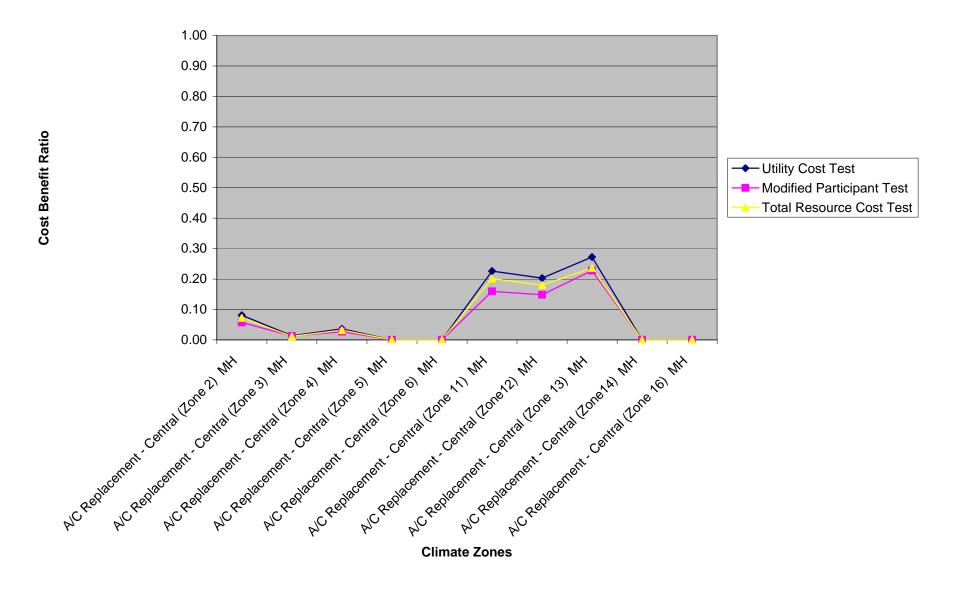
A/C Replacement - Central - SF



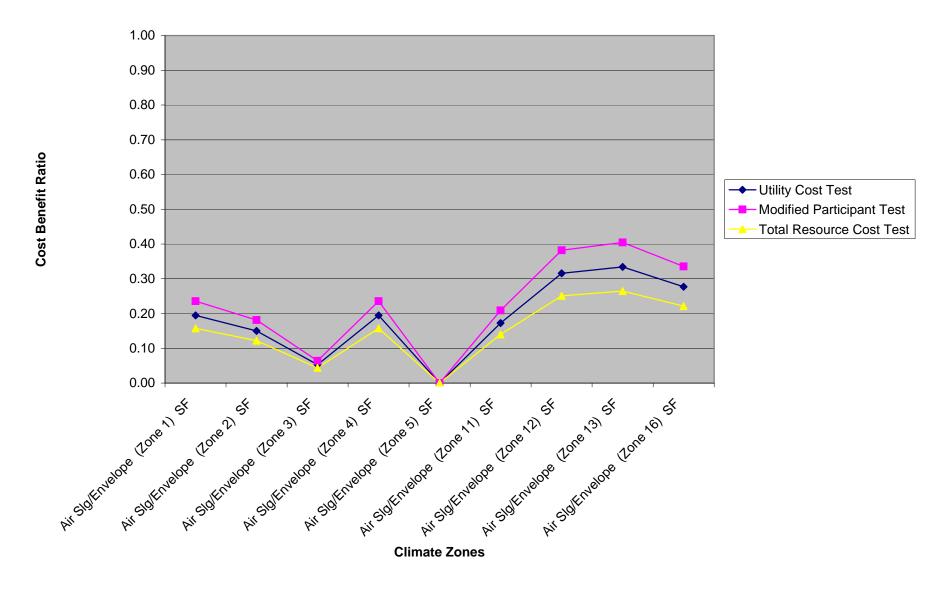
A/C Replacement - Central - MF



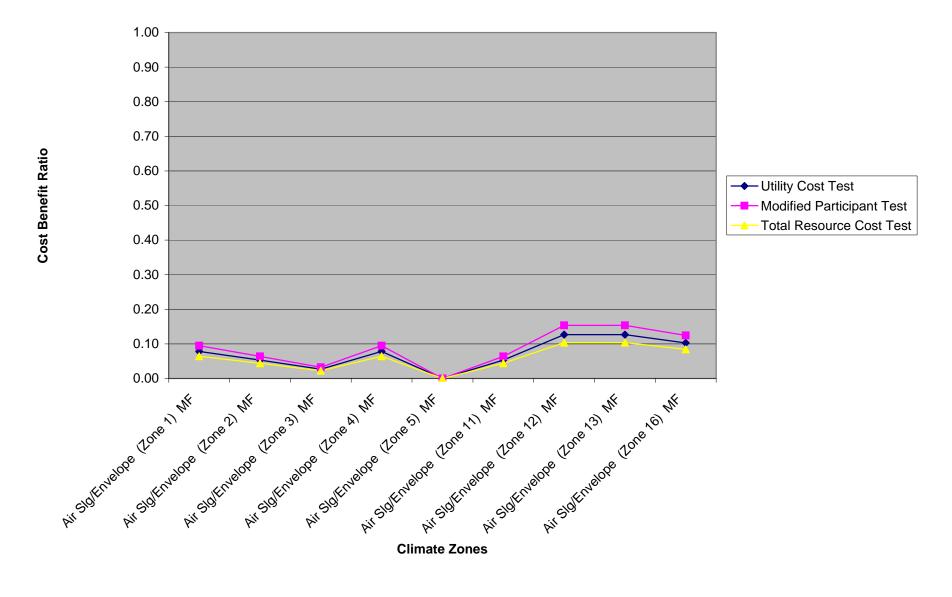
A/C Replacement - Central - MH



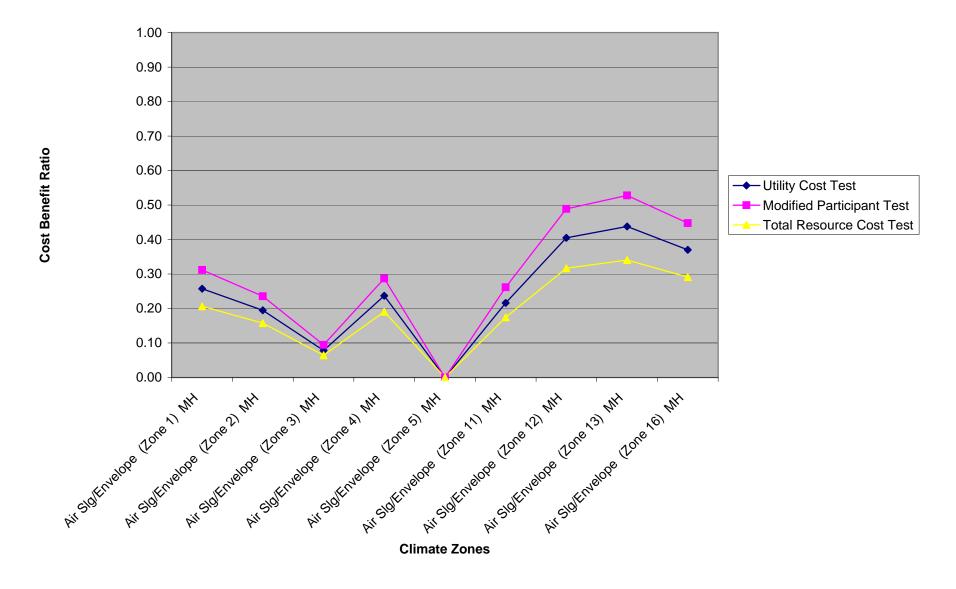
Air Sealing & Envelope - SF



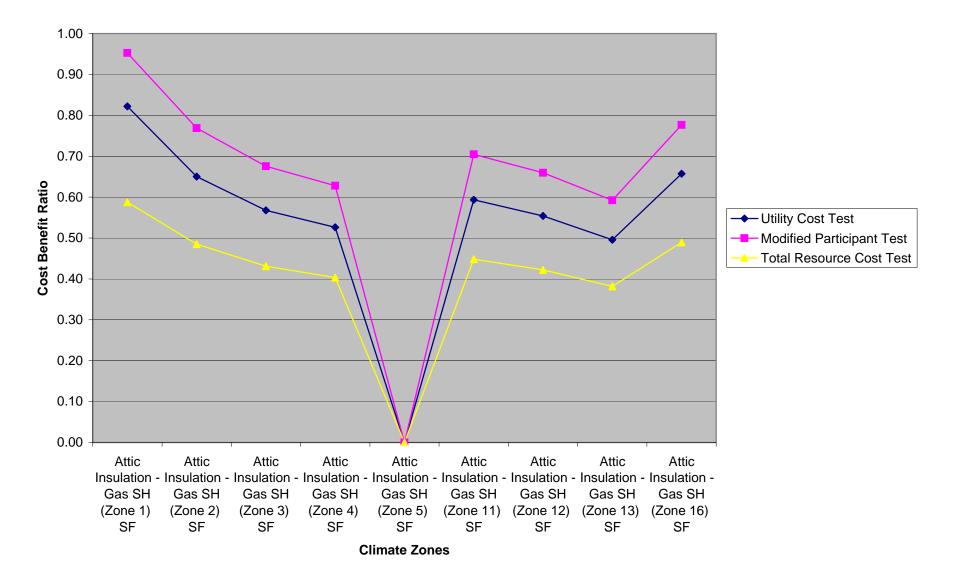
Air Sealing & Envelope - MF



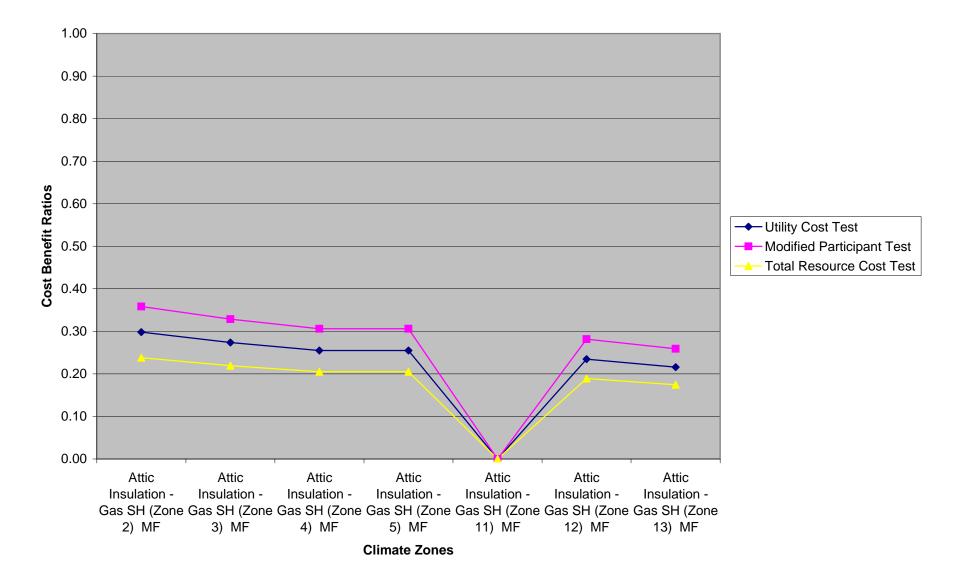
Air Sealing & Envelope - MH



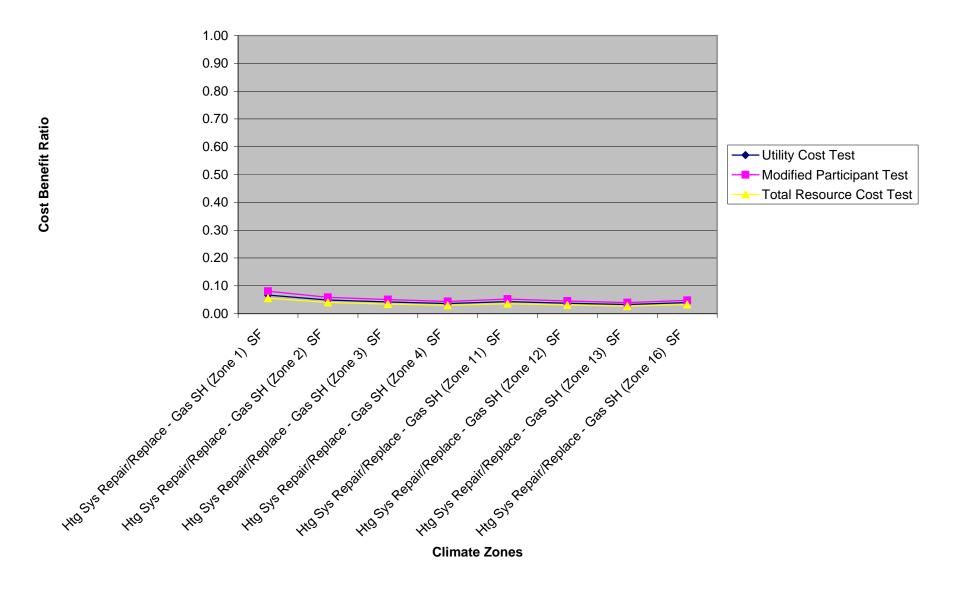
Attic Insulation - Gas SH - SF



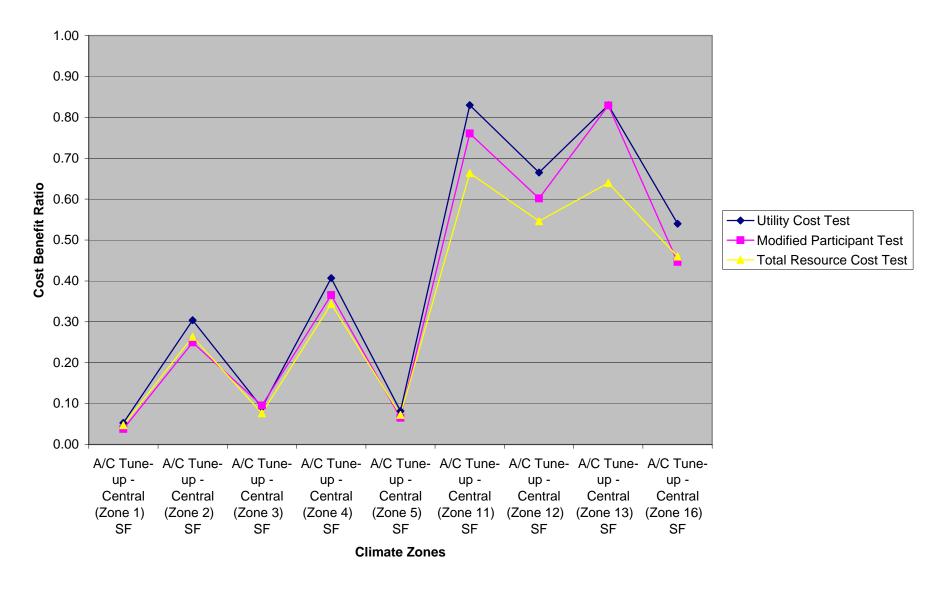
Attic Insulation - Gas SH - MF



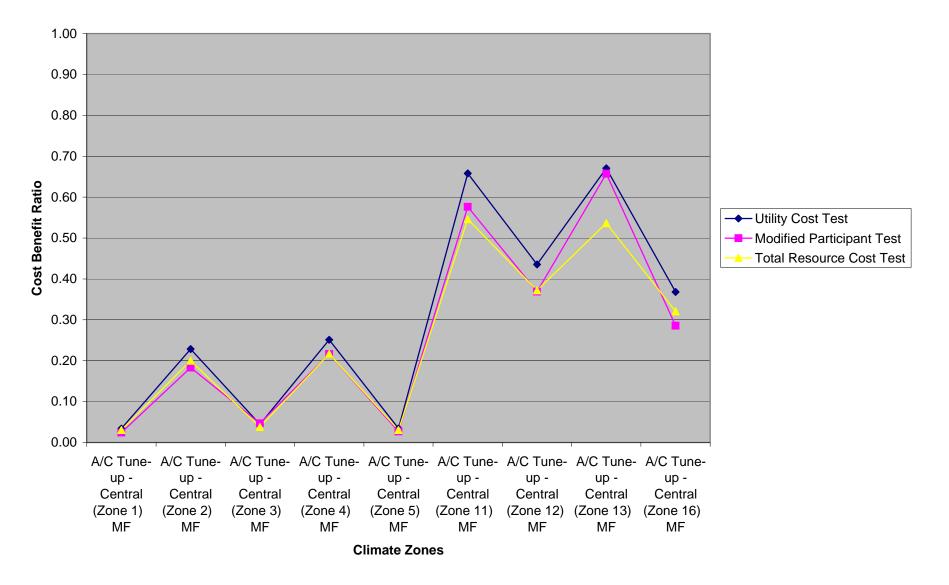
Heating System Repair & Replacement - Gas SH - SF



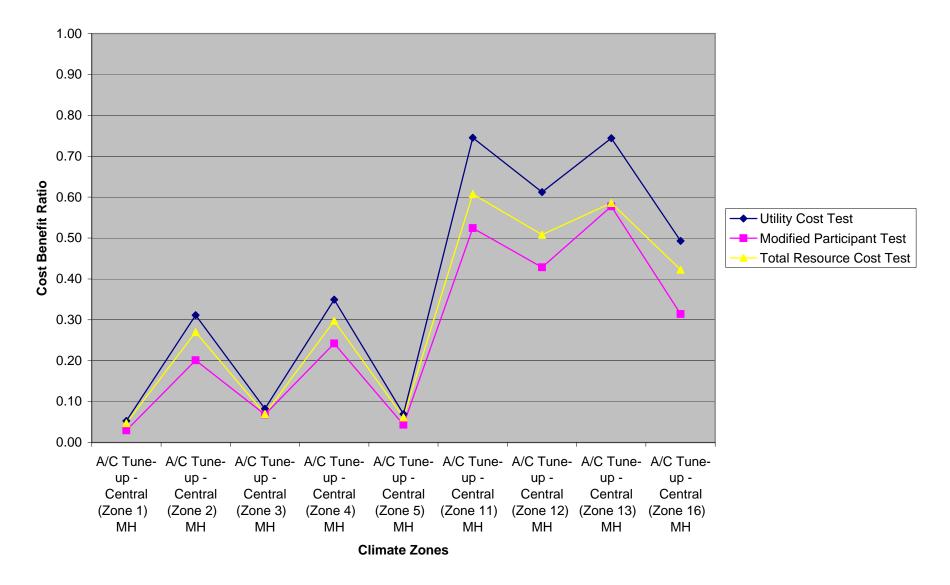
A/C Tune-up - Central - SF



A/C Tune-up - Central - MF



A/C Tune-up - Central - MH



Attachment A-7

	A	В	С	D			
1	LIEE Cost-Effectiveness - Non Weather Sensitive Measures						
2	Pacific Gas and Electric Company						
3	r domo duo una ziconio dompuny						
4							
		Utility Cost Test	Modified	Total Resource			
		2	Participant Test	Cost Test ²			
5	Measure		2	Cost Test			
6							
_	Microwave	2.39	1.43	0.99			
_	Wtr Ht Conservation SF	1.14	1.01	0.71			
	TORCHIERE - 55 W (D03-842 RES00AVTor55) SF	0.96	0.90	0.62			
10	OCCUPANCY SENSOR D03-856 - WALL BOX (3 2-lamp fix w/T8 34 W EL) SF/MF/MH	0.91	0.86	0.60			
	Wtr Ht Conservation MH	0.89	0.84	0.60			
	Wtr Ht Conservation MF	0.67	0.67	0.48			
	Compact Fluorescents (inc. porchlights) SF MF MH	0.62	0.63	0.44			
14	Refrigerators MH	0.61	0.62	0.44			
	Refrigerators SF	0.60	0.60	0.43			
16	Interior Hard wired Compact Fluorescent fixtures SF/MF/MH	0.57	0.59	0.41			
17	Refrigerators MF	0.50	0.52	0.37			
18	Clothes Washer Energy Star, 2.65 cf, Tier 1	0.48	0.50	0.36			
19							
20	Exterior Hard wired Compact Fluorescent fixtures SF MF MH	0.23	0.25	0.17			
	Water Heater Repair & Replacement - Gas SF/MF/MH	0.13	0.14	0.11			
22							
23							
	* NOTE: Orange-highlighted measures have a cost-benefit ratio over 1.0. Pink line demarcates measures	with cost effective	eness over 0.5. Me	easures			
	highlighted in green are included in PG&E's 2009-2011 LIEE program. Measures highlighted in yellow are	included in PG&E	's 2009-2011 LIEE	program based			
24	on usage, comfort, health and safety.			-			
25	¹ Based on 2010 program year						
26							
27							

Attachment A-8

PY 2009 - 2011 LIEE Measurement and Evaluation Studies
Pacific Gas and Electric Company

			Percent Paid by	Total Cost Paid by
Line No.	Statewide Study ¹	Total Cost	PG&E	PG&E
	Impact Evaluation of the 2010 LIEE	\$600,000	30%	\$180,000
1	Program ^{2, 5}			
	Process Evaluation of the 2009	\$250,000	30%	\$75,000
2	LIEE Program ²			
3	Non-Energy Benefits Study ²	\$300,000	30%	\$90,000
	Refrigerator Degradation EUL	\$200,000	33.33%	\$66,660
4	Study ³			
	LIEE Household Segmentation	\$200,000	60%	\$120,000
5	Study ⁴			
Total		\$1,550,000		\$531,660

¹ This does not include the Statewide PY2008 LIEE Impact Evaluation study previously authorized in D.06-012-038. This previously authorized funding for the PY2008 impact study is will be expended in 2009-2010. PG&E's share of the \$600,000 Joint Utility study is \$180,000. The M&E budget carryover is discussed in 2009-2011 LIEE Testimony in Section VI.C.1, and shown in Table VI-2.

² Jointly funded by PG&E, SCE. SDG&E, and SoCalGas.

³ Jointly funded by PG&E, SCE and SDG&E, the Electric Utilities

⁴ Jointly funded by PG&E and SCE.

⁵ The PY2010 evaluation will be conducted in 2011-2012; therefore some portion of the funding will be carried over into the next program cycle, as discussed in 2009-2011 LIEE Testimony, Section VI.C.1., and shown in Table VI-2.

Attachment A-9 Summary of PG&E LIEE Program Proposals for 2009, 2010, and 2011

Proposal	Description	Benefits	Current Practice
Targeting LIEE Program Delivery by Energy Use	PG&E will offer the 2009-2011 LIEE program through a multi- layered approach that considers energy use, as well as other factors including climate zone and housing type. Because so few measures are truly cost effective to offer in the LIEE program, PG&E determined to offer those measures that are <i>most</i> cost effective to all qualifying customers for whom they are feasible.	PG&E's targeted approach based on climate zones and customer energy use fulfills the energy and equity objectives of the decision and is cost effective, allowing more low income people to receive more of the measures and services they need. PG&E decided to offer some less cost-effective measures based on a customer's electric and/or gas use because customers with the highest energy use also offer the greatest opportunity to save energy. This ultimately helps both the affected customers, who save money on their bill, and all California ratepayers, who benefit as decreases in energy use strengthen the State's energy resources and decrease GHG emissions	PG&E offers all feasible measures to all eligible customers that qualify for them. Feasibility criteria include climate zone, housing type and age of equipment.
NGAT	PG&E requests that LIEE NGAT be funded through the LIEE program rather than the GRC, as the NGAT procedures adopted by the Commission are specific to LIEE. The complete NGAT procedure conducted under the LIEE program is not part of PG&E's routine CO testing service	The addition of NGAT funding into the LIEE program is more critical now that the LIEE program is ramping up to meet the Decision 07-12-051 programmatic initiative. As a direct function of the LIEE program, NGAT funding should be linked to LIEE rather than the GRC which occurs on a	Funding for NGAT/CO testing for the LIEE program is currently provided in the GRC at \$2.84 million per year.

Proposal	Description	Benefits	Current Practice
NGAT (continued)	to non-LIEE customers. The amount of funds required for NGAT is directly related to the number of homes that receive infiltration measures under the LIEE program. This proceeding, not the GRC, is the appropriate forum to determine the appropriate funding for NGAT.	different cycle. The amount of NGAT funding previously authorized under the GRC was based on lower LIEE program participation goals and is insufficient to meet the increased demands of the new LIEE program, which jeopardizes PG&E's ability to meet the programmatic initiative. PG&E will need additional funding of NGAT as outlined in Attachment A-1 to meet the increased number of tests required for the 2009-2011 LIEE program.	
New Measure- Torchiere Lamps	Replace Torchiere lamps that are equipped with the halogen light bulb fixtures with Torchiere lamps that will except pin based compact fluorescent light bulbs.	Removing high intensity wattage halogen light fixtures with CFL light fixtures will provide a safer lighting product with significant energy savings.	Torchiere lamps are currently not a measure in PG&E's program.
Pilot Measure – High Efficiency Clothes Washers	Replace older Clothes washers with High Efficiency washer in large households	High Efficiency Washers use significantly less water, less electricity and less gas (for homes with gas water heater). This results in water conservation as well as energy conservation for the customer.	Currently LIEE does not replace Clothes washers. PGE does provide a rebate to customers who purchase their own.
New Measure – Occupancy Sensors	The LIEE Occupancy Sensors will be installed in single family dwellings to control usage of T-12 and T-8 lamp fixtures.	Occupancy Sensors impact both total energy use and demand in public and personal spaces.	Currently the LIEE program does not install occupancy sensors
Pilot Measure – Microwaves with Meals on Wheels	LIEE will leverage with the Meals on Wheels Program in local communities to install energy saving microwaves into customers	Microwave ovens use less energy (up to 80% less) than conventional ovens. In addition to saving energy, microwave ovens	Currently LIEE does not offer a microwave delivery program

Proposal	Description	Benefits	Current Practice
Pilot Measure – Microwaves with Meals on Wheels (continued)	homes.	generally cook food much faster, and don't generate as much heat in your kitchen, so you could save on air conditioning costs during the summer.	
Project – Group Energy Education	Work with more community based organizations to conduct workshops that shall address customers' energy usage, utility bill assessment and energy saving practices.	The objective is to have participants adopt energy saving behaviors which results in lowering their energy bills and less demand on the grid.	Currently we work with Glenn County Human Services Agency, Redwood Community Action Agency and Amador-Tuolumne Community Action Agency to conduct workshops.
Pilot Project – City of San Jose partnership	Expand community awareness about (1) energy efficiency and (2) PG&E LIEE resources in San José SNI neighborhoods, particularly among minority and English Language-learning groups.	This program will allow the City of San José and PG&E to partner in meeting an unmet community need: A comprehensive approach to community well-being and sustainability that brings together physical safety, economic security, empowerment, and environmental sustainability. All of these must be enacted at the individual and community levels simultaneously in order to be successful.	Currently we do not partner with San Jose.
Pilot Project – Habitat for Humanity	PG&E will partner with Habitat for Humanity to promote energy efficiency for low income customers.	Assist low income families by lowering their energy usage and monthly energy bills. The families will also receive an energy education so that they can learn how to read their bills and other ways they can conserve energy.	Currently we do not partner with Habitat for Humanity
Pilot Project – Smart AC Thermostat or Switch Installation	Proposal to integrate the Smart AC Program into the LIEE Program as an effort to leverage	The Customer can choose between two Smart AC technologies, both of which allow	PGE offers Smart AC to all customers but currently there is no leveraging between LIEE and the

Proposal	Description	Benefits	Current Practice
Pilot Project – Smart AC Thermostat or Switch Installation (continued)	with Demand Response.	PG&E to temporarily reduce the amount of electricity their air conditioner uses, reducing the overall demand for energy in the territory. PG&E will give the customer a \$25 cash reward for every Smart AC device installed.	Smart AC team.
Pilot Project – AMI	Integrate Advanced Metering into the LIEE program when it is available.	Educate customers on how they can use the new "Advanced Meters" to help learn about their power usage and reduce their bills.	Currently the Advanced Meters are in the process of being deployed to residential customers throughout PGE service territory.
Project – Refrigerator Leveraging	The LIEE refrigerator program has been in place since 2004, whereupon community based organizations or action agency that works on the California State Development Agency's (CSD) weatherization program that do not participate in PG&E"s LIEE program may participate. These LIHEAP agencies are working with CSD to install weatherization measures in low-income homes.	The LIEE Refrigerator Leveraging Program pays for the refrigerator and its installation costs. By providing the refrigerator, it releases funds that may be utilized for additional weatherization measures that may be needed in the home.	The LIEE Refrigerator program is a successfully run partnership since 2004.
Study – Impact Evaluation of PY2010 LIEE Program	PG&E, SCE, SDG&E, and SCG (the Joint Utilities) propose to conduct an impact evaluation of the 2010 LIEE program. The primary objective of the study is to estimate the PY2010 first year electric and gas savings by utility, by housing type, and by measure group. This study will occur in 2011-2012.	The LIEE Impact Evaluation of the 2010 Low Income Program will determine energy and demand savings associated with PY2010 and will be used for reporting purposes. An accurate determination of measure savings is critical for guiding program delivery and determining cost effectiveness. Impact, process and related studies facilitate the	D.03-10-041 required the Joint Utilities to conduct a program impact evaluation of the LIEE program every 2 years. This study updates energy, demand and therm savings associated with the program.

Proposal	Description	Benefits	Current Practice
Study – Impact Evaluation of PY2010 LIEE Program (continued)		achievement of the Programmatic Initiative by determining measure savings and improving programs that generate savings.	
Study – Process Evaluation of PY2009 LIEE Program	PG&E, SCE, SDG&E, and SCG (the Joint Utilities) propose to conduct a Process Evaluation of the 2009 LIEE Program to assess the effectiveness of the program and to develop recommendations to program design or delivery that will improve the effectiveness of the program. A key component of this process evaluation will explore attitudinal and behavioral aspects of its LIEE and CARE population.	The Process Evaluation will assess the effectiveness of various components of the LIEE program such as outreach, contractor delivery, data tracking, etc. This study will also look at customer behavior and attitudes towards energy saving opportunities. The study will assess customer willingness to participate in energy saving programs, the particular needs of high usage customers, and low income customer responses to energy education and communication efforts. The Study will provide real-time feedback, and present findings and the recommendations for possible program changes.	A Process Evaluation has not been performed for several years. The Joint Utilities recommend a Process Evaluation now because it is prudent to assess the efficacy of all the changes to the program so that we can expand the most effective strategies.
Study – Non-Energy Benefits	PG&E, SCE, SDG&E, and SCG (the Joint Utilities) propose a Non-Energy Benefits study to quantify the elements of a cost effectiveness analysis, which is a key determinant of program design. Utility personnel and other stakeholders have raised questions about the methods used to develop the current values assigned to non-energy benefits of the programs, which come from a	The study will address the following research objectives: 1) Provide background on the use of NEBs in cost-effectiveness tests for low-income energy efficiency programs. 2) Discuss the effectiveness and appropriate use of the following options in developing NEB values for cost-effectiveness tests: a) review and update values and algorithms in the	The Joint Utilities assess program cost effectiveness with the Utility Cost (UC) Test and the Modified Participant Cost (PC _m)Test, both of which were modified to include appropriate NEBs. These two tests were adopted in D.02-08-034. The Non-Energy Benefits Study would update the current methodology used by the joint utilities to assign non-energy benefits to program measures for

Proposal	Description	Benefits	Current Practice
Study – Non-Energy Benefits (continued)	study that is now several years old.	current model, b) develop a set of factors which would be used to project the energy benefits of LIEE programs to account for the NEBs. 3) Provide a methodology for assigning NEBs at the measure level for cost-effectiveness testing.	the purpose of assessing their cost-effectiveness. The current methodology was established in 2001 and many of the values used to calculate NEBs are outdated and inappropriate for the current program.
Study – Refrigerator EUL Degradation	PG&E, SCE and SDG&E (the Joint Electric Utilities) propose a study of refrigerator retention and efficiency degradation in 2009. The study will combine phone interviews, secondary research, statistical modeling and on-sites when necessary to determine optimal refrigerator replacement criteria.	The Joint Utilities need to determine the appropriate age at which to replace older, less efficient refrigerators through the LIEE program to achieve maximum energy savings. 1993 was chosen as an appropriate cutoff because energy efficiency standards that went into effect in 1993 made post -1993 refrigerators much more energy efficient than refrigerators that were manufactured pre-1993. However, in 2008, a refrigerator manufactured in 1993 is already 16 years old. According to DEER, refrigerators have a 15-20 year effective useful life (EUL).	Currently, program rules for LIEE require that contractors limit refrigerator replacements to pre-1993 appliances.
Study – LIEE Household Segmentation Study	PG&E and SCE propose a LIEE Segmentation Study to facilitate identification of eligible customers willing to participate for our LIEE	This study will directly deliver on the first strategic goal of the Low Income section of the CEESP to develop customer segmentation	PG&E does not market the LIEE program. PG&E has done no specific customer segmentation analysis for the LIEE program.

Proposal	Description	Benefits	Current Practice
Study – LIEE Household	programs. A successful customer	and will support the Commission's	
Segmentation Study (continued)	segmentation scheme will support	goal of achieving 25% customer	
	specific messaging, products and	participation by year-end 2011.	
	services that are more likely to	For example, as market	
	lead to energy saving behaviors.	transformation occurs in the CFL	
		arena, and as refrigerator	
		replacement criteria impact future	
		savings potential, the results of	
		this LIEE Household Targeting	
		Study will facilitate identification	
		and outreach to eligible and willing	
		customers, thereby enhancing	
		program cost effectiveness.	
		Usage-based segmentation will	
		help define the size of the market	
		eligible for relatively more	
		expensive measures such as cooling measures.	
Reach Plus	PG&E requests authorization to	The REACH PLUS program will	The current REACH PLUS funds
Reactifius	add \$10 m per year (\$30 million	enable customers who are	have been exhausted.
	total) to continue the REACH	suffering economic hardships to	nave been exhausted.
	PLUS program to address the	be assisted. In combination with	
	emergency assistance needs of	the current economic downturn	
	low-income customers. The	(high prices of gas, increasing	
	REACH PLUS program was	costs of fuel) this additional	
	created in response to the July	funding will assist in the continuing	
	2006 Heat Storm.	unmet need of assistance. The	
		REACH PLUS program was highly	
		successful, assisting	
		approximately 40,000 customers	
		over the last 18 months.	
Funding Flexibility	PG&E further requests	This flexibility will enable the	Prior to 2007, the Commission
,	authorization to carry forward or	utilities to make necessary	had provided full flexibility to the
	carry back funding into 2009, 2010	adjustments among appliance	utilities to shift funds among
	or 2011 during the 3-year funding	purchases, weatherization	program categories as needed to
	cycle to promote seamless	measures, marketing, training,	achieve program objectives. In

Proposal	Description	Benefits	Current Practice
Funding Flexibility (continued)	program delivery to customers throughout the 2009-2011 timeframe. PG&E requests full authority to shift funds among program categories in 2009, 2010 and 2011.	and other activities to efficiently achieve 25 percent of the Commission's programmatic initiative by 2011.	Decision 06-12-038, the Commission restricted movement of funds among measurement and evaluation, general administration, and the regulatory compliance categories
Measurement and Evaluation (M&E) Carryover Funding	M&E impact studies cannot begin until after the program year is complete and 1 full year of postbilling data is available, yet the study should be planned during the implementation year, and funds are requested with the program implementation year implementation budgets. PG&E requests permission to carry-over funding for authorized M&E studies across program years and program cycles	Allowing multi-year M&E funding to be carried over allows study planning to occur and consultants to be hired. The most successful M&E studies are planned during program implementation so that all appropriate data can be collected and tracked. This is even more important for multi-utility studies.	Un-spent carry-over funds are required to be applied toward energy efficiency measure categories.
Gas/Electric Expense Allocations	PG&E is proposing to update its LIEE electric/gas expense ratio for 2009-2011 to 62/38 which is based on a forecast of gas and electric LIEE measures to be installed in 2009-2011.	The change in the electric/gas expense ratio more closely alligns the revenue collection with the forecast of measure installation in the 2009-2011 LIEE Program.	Currently, the LIEE expense electric / gas expense ratios are 70/30 electric / gas, respectively.
Gas/Electric LIEE Expense Reporting	PG&E will record 2009-2011 LIEE expenses consistent adopted electric/gas expense ratio adopted in this proceeding.	This proposed method is consistent with the method adopted for the recording of EE measures.	Currently, PG&E records the measures based on actual expenses with certain measures such as education being split between electric and gas. Administration costs are recorded based on the electric/gas expense ratio.
PG&E will meet the Commissions 25% goal	PG&E proposes a methodology to calculate 25% of its willing and eligible LIEE customers that is	This methodology includes the 10% unwillingness factor from KEMA's 2007 Needs Assessment	In 2007, PG&E treated 63,319 customer homes.

Proposal	Description	Benefits	Current Practice
PG&E will meet the Commissions 25% goal (continued)	based on the following formula: (the number of estimated eligible customers derived using the Commission-approved demographic method from PUMS census data) minus (10% unwilling to participate, factor from KEMA Needs Assessment) minus (LIEE customers treated since 2002) minus (LIHEAP customers treated since 2002) = 25%.	Study. Utilities do not have data on unwilling customers and will track this number so that they can better estimate unwilling customers in the next application. The methodology also includes all customers treated by LIEE and LIHEAP since 2002, when many new measures were added into the LIEE program. Since LIHEAP customers also get all feasible measures and the two programs offer most of the same measures, LIHEAP customers are not expected to require additional services under LIEE. This method offers a realistic calculation of the 25% goal, which PG&E's 2009-2011 program and budget proposes to exceed.	
Statewide LIEE Tagline	PG&E, working with the other IOUS, will develop a tagline by mid July. This tagline will be used with its existing Energy Partners name for the LIEE program to promote statewide awareness of LIEE.	The new program tagline will be used in all customer communications, including advertising, collateral, and website. The tagline will help reach low-income customers with interest in lowering energy bills and increasing home comfort. The utilities will develop a program tagline with consideration on how it will translate into other languages. The utilities have contracted with an advertising agency to test concepts in the respective service areas through focus groups, mall	Each utility has its own name for the LIEE program. PG&E does not use the LIEE name with its customers to avoid any stigma or barriers associated with "low income." PG&E does not currently have a marketing plan for the LIEE program. Currently, low-income customers are made aware of the LIEE program through a wide range of methods including, but not limited to: door to door canvassing, telemarketing, television, radio, news print, customer referrals, internet and referrals from other low-income

Proposal	Description	Benefits	Current Practice
Statewide LIEE Tagline		intercepts, and online	assistance programs
(continued)		communications, and expect to	
		present a recommended program	
		tagline to the Commission by	
		July 14, 2008. Implementation of	
		the new statewide program tagline	
		will facilitate the integration and	
		visibility of the LIEE program	
Integration	PG&E's 2009-2011 LIEE program	Integration with other programs	PG&E shares data with CARE and
	is integrated with CARE, Energy	and agencies, as well as within	the other IOUs.
	Efficiency, CSI, Demand	PG&E, creates efficiencies that	
	Response, LIHEAP, and other	helps to minimize costs, allowing	
	agencies and programs offering	LIEE services to be delivered to	
	low income services.	more low income customers.	
		For example, PG&E LIEE program	
		managers meet frequently with	
		LIEE program managers at the	
		other IOUs to share successful	
		program practices and discuss	
		LIEE strategies, research and	
		outreach. The utilities conduct	
		joint evaluations and market	
		research studies, with input from	
		Energy Division. PG&E shares	
		enrollment data regarding	
		customers in joint utility areas with	
		the other utility so that qualifying	
		low-income customers can be	
		automatically enrolled with no	
		additional paperwork or income	
		verification. Additionally, the IOUs	
		jointly host quarterly public	
		meetings on both the LIEE and	
		the CARE programs	
Section 8 Housing	Enrolling qualified public housing	Tenants will be made aware of	Currently customers are signed up
	tenants in the LIEE program is a	LIEE and CARE programs at the	on a case by case basis. We do

Proposal	Description	Benefits	Current Practice
Section 8 Housing (continued)	high priority for PG&E. PG&E LIEE program staff will work with Public Housing in its service area to integrate LIEE enrollment into the enrollment and intake process of the Public Housing in their service area.	EE program staff will work with blic Housing in its service area integrate LIEE enrollment into e enrollment and intake process the Public Housing in their	
Rescind 3-measure minimum required to treat home	PG&E proposes to do away with the three-measure minimum criteria for treating a home. Under this rule of the current program, a home must qualify to receive a minimum three measures (or a refrigerator) in order to participate in the LIEE program. PG&E will assess and install all qualifying homes for all measures under the program for which they qualify.	Allows more homes to be treated, including homes that only receive one commodity (either gas or electricity) from PG&E. Increases leveraging opportunities with LIHEAP and other agencies.	In the current LIEE program, a home must qualify to receive a minimum three measures (or a refrigerator) in order to participate in the LIEE program.
Increased LIEE Budget	PG&E proposes a 3-year budget of \$422,338,000 for the 2009-2011 period. This budget includes the \$30 million for REACH PLUS.	Increased budget will allow PG&E to meet goal serving of 25 percent (300,000) of PG&E's low-income eligible and willing customers by 2011. PG&E believes that the requested level of funding provides the optimal balance between the important and increasingly visible benefits that the LIEE program provides to our customers, and the ongoing need to keep rates low and stable.	Budget for 2008 is \$77,733,500 Homes treated Goal for 2008 is 58,200
Competitive Bid	PG&E will release a Request for	PG&E continues to seek	PG&E routinely bids out the

Proposal	Description	Benefits	Current Practice
Competitive Bid (continued)	Proposal (RFP) for a competitive bid for the prime administration of the LIEE program for the 2009-2011 program years.	additional contractors who have project management experience and other organizations who might be interested in bidding for either the PMF or the implementation portion of the program. PG&E will send out invitations to all contractors on the list asking them to respond if they are interested in bidding on the Project Management piece of the contract. Once the PMF has been selected, the PMF will be required to bid the actual installation and appliance delivery/recycling part of the program.	administration of its LIEE program. The LIEE program administrator competitively bids out program implementation work and hires the program contractors. Currently, Richard Heath and Associates, Inc (RHA) is the prime contractor and is the result of a competitive bid. In 2008 PG&E extended its bid with RHA, per Commission approval.

PACIFIC GAS AND ELECTRIC COMPANY APPENDIX B

Attachment B-1

PY 2009 - 2011 CARE Proposed Program Budget Pacific Gas and Electric Company

CARE Budget Categories	20	08 Authorized	2	009 Planned	2	010 Planned	2	011 Planned
Outreach	\$	5,032,000	\$	5,500,000	\$	5,700,000	\$	5,900,000
Proc., Certification and Verification	\$	1,600,000	69	1,800,000	\$	1,900,000	\$	2,000,000
Information Tech./Programming (1)	\$	300,000	\$	300,000	\$	300,000	\$	300,000
Pilots (2)	\$	-	\$	-	\$	75,000	\$	-
Measurement and Evaluation	\$	-	\$	-	\$	-	\$	-
Regulatory Compliance	\$	100,000	\$	105,000	\$	110,000	\$	115,000
General Administration	\$	300,000	\$	500,000	\$	525,000	\$	550,000
CPUC Energy Division Staff	\$	100,000	\$	206,000	\$	206,000	\$	206,000
Cooling Centers (3)	\$	300,000	\$	350,000	\$	400,000	\$	450,000
Total Expenses	\$	7,732,000	\$	8,761,000	\$	9,216,000	\$	9,521,000
Subsidies and Benefits (4)	\$	459,327,860	\$	461,250,651	\$	470,115,337	\$	479,707,435
Total Program Costs and Discounts	\$	474,791,860	\$	478,772,651	\$	488,547,337	\$	498,749,435

- (1) Note: Includes Automatic Enrollment budget of \$150K.
- (2) Note: Includes the Recertification and Post Enrollment Survey of \$75K in 2010.
- (3) Note: Includes Cooling Centers as approved in Advice 3220-E-A.
- (4) Note: Subsidy costs are the most recent projections, and will vary based on actual volumes and the Weighted Average Cost of Gas (WACOG).

Attachment B-2

PY 2009 - 2011 CARE Estimated Participation Pacific Gas and Electric Company

	Total Enrolled 12-31-07	Total Enrolled Through March 2008	Estimated	Estimated Net PY 2008 Enrollments	Year End PY	PY 2008 Goal Rate	Estimated PY 2009 Net Enrollments	Estimated Year End PY 2009 Participation	PY 2009 Goal Rate	Estimated PY 2010 Net Enrollments	Tear End FT	Goal Rate	2011 Net Enrollments	2011	Goal Rate
(Source)	(1)	4/21/08 RD Report	(2)	(3)	(Col. B+E)	(Col. F/D)	(2)	(Col. F+H)	(Col. I/D)	(2)	(Col. I+K)	(Col. L/D)	(2)	(Col. L+N)	(Col. O/D)
	1,107,733	1,113,005	1,528,221	-36,228	1,071,505	70%	9,000	1,080,505	71%	22,000	1,102,505	72%	22,500	1,125,005	74%

⁽a) Estimated PY2009, PY2010 and PY2011 Goal Rate will fluctuate based on updated CARE Eligibility information to be filed October 2008, October 2009 and October 2010.

⁽¹⁾ CARE Annual Reports, dated 5/1/08

⁽²⁾ Each utility's estimate based on eligibility rates filed.

⁽³⁾ Most recent estimates of net enrollments.

Attachment B-3

PY 2007-2008 CARE Outreach and Penetration Information Pacific Gas and Electric Company

CARE PY 2007				
		Estimated # of	Estimated # of	Percent of New
Outreach Method	Total Cost	Customers	Customers	Enrollments for PY
		Reached 1	Enrolled	2007
Bill inserts	\$344,344	12,350,000	23,834	9.3%
Community Outreach Contractors (COCs)	\$68,235	N/A	4,549	1.8%
Direct mail	\$1,341,326	3,324,109	68,346	26.7%
Ethnic media	\$100,000	N/A	N/A	N/A
Leveraging with other California utilities	\$0	N/A	6,629	2.6%
Leveraging with other PG&E low-income programs	\$0	N/A	12,986	5.1%
Leveraging with PG&E employees	\$10,343	20,000	1,093	0.4%
Local office partnerships	\$2,000	N/A	6,871	2.7%
Multi-cultural event participation	\$72,563	N/A	426	0.2%
Public assistance organization partnerships	\$2,912	N/A	327	0.1%
Website promotion	\$0	N/A	12,209	4.8%
Welcome packet insert	\$56,296	1,680,000	35,466	13.8%

CARE PY 2008 ²				
Outreach Method	Total Cost	Estimated # of Customers Reached 1	Estimated # of Customers Enrolled	Percent of New Enrollments for PY 2008
Bill inserts	\$395,541	9,853,000	18,000	7.5%
Community Outreach Contractors (COCs)	\$75,000	N/A	5,000	2.1%
Direct mail	\$1,841,263	4,090,981	91,928	38.3%
Ethnic media	\$225,000	N/A	N/A	N/A
Leveraging with other California utilities	\$0	N/A	6,500	2.7%
Leveraging with other PG&E low-income programs	\$0	N/A	13,000	5.4%
Leveraging with PG&E employees	\$15,000	50,000	1,000	0.4%
Local office partnerships	\$2,500	N/A	6,800	2.8%
Multi-cultural event participation	\$100,000	N/A	400	0.2%
Online enrollment	\$250,000	N/A	10,000	4.2%
Public assistance organization partnerships	\$14,000	N/A	250	0.1%
Website promotion	\$0	N/A	12,000	5.0%
Welcome packet insert	\$80,000	1,440,000	35,000	14.6%

¹ It is not possible to estimate the number of customers reached via the methods marked N/A.

² 2008 information is estimated.

Attachment B-4 Summary of PG&E CARE Program Proposals for 2009, 2010, and 2011

Proposal	Description	Benefits	Current Practice
1. Same residential program	Change certification period of	Reduce number of eligible	All sub-metered tenants are
requirements for sub-metered	sub-metered tenants from one	customers dropped for non-	recertified annually except sub-
tenants.	year to two years and require	response; reduce program	metered tenants with fixed
	them to go through post	costs.	income which are recertified
	enrollment verification process.		every four years.
2. Two years certification	Change the certification period	Reduce number of eligible	All facilities of Expanded
period for CARE Expanded	for CARE Expanded Programs	customers dropped for non-	Programs are recertified
Programs.	from one year to two years.	response; reduce program	annually.
		costs.	
3. In order to help qualified	PG&E will conduct a survey	PG&E will learn more about	PG&E customers self certify.
customers remain on the CARE	research study of CARE	the reasons customers do not	PG&E post-verifies a
program, PG&E proposes a	customers not responding to	recertify or post-verify and find	percentage of CARE
survey research study to	recertification and post	ways to address those reasons,	customers, requiring them to
understand 1) which customers	enrollment verification	helping to maintain current	submit income documentation.
do not respond to multiple	requests. PG&E will utilize	CARE enrollment rates.	PG&E requires all CARE
recertification and post-	experienced in-language survey		customers to recertify
enrollment income verification	researchers as well as		periodically. Customers who
requests, 2) why they do not	community agencies having		do not respond to requests to
recertify or provide income	local knowledge of their		recertify or post-verify income
documentation, and 3) how	communities and the trust of		are dropped from the program.
PG&E can overcome these	their clients.		
barriers to their continued			
participation.			
4. Develop process for	Recommendation not to move	Increase enrollment; reduce	Although CARE has partnered
automatically qualifying	forward with automatic	program costs; maintain	with PHAs in the past, CARE
tenants of public housing and	enrollment of public housing	program integrity; overcome	has been unable to enroll
Section 8 housing.	and Section 8 housing tenants,	obstacles to partnering with	qualifying tenants of public
	and instead recruit public	HUD.	housing and Section 8
	housing agencies as CARE		throughout the past year.

	Community Outreach Contractors.		
5. CARE program budget increase.	Increase outreach budget for: the mailing of bill inserts; conducting direct mail initiatives; conducting radio, television and print media campaigns within the major CARE program ethnic markets.	Increase program awareness and enrollment.	In 2008, CARE is not implementing the Refer-a-Friend direct mail initiative; not conducting television, radio and print media campaigns within all major CARE program ethnic markets; cutting costs in other aspects of outreach to compensate for the increased bill insert costs, printing, and postage.
6. Change allocation of CARE administrative cost between electric and gas to 80/20.	Consistent with the currently adopted practice from D.89-07-062, PG&E allocates the CARE administrative costs between electric and gas in proportion to the 20 percent discounts received by CARE customers in the previous year. For 2009-2011, PG&E is assigning 80 percent of the CARE administrative costs to electric and 20 percent to gas.	Compliance with D.89-07-062. Administrative cost allocation will be in proportion to the discounts received by customers in PY 2006-2008.	The current allocation of CARE administrative costs between electric and gas is 65/35.
7. Continue funding and reallocation of budget funds.	Continue funding for PY2009 if the Commission is delayed in issuing a decision and for flexibility in managing the funds each program year.	Allows non-disrupted services to CARE participants and ability to respond to changing needs within program activities without delays.	Currently authorized.

PACIFIC GAS AND ELECTRIC COMPANY APPENDIX C

PY 2009 - 2011 CARE and LIEE Rate Impacts - Electric (cents/kWh) Pacific Gas and Electric: Table C-1 Bundled Electric Rates

PY 2009	Average Rate Excluding CARE/LIEE Surcharge	CARE Subsidy Portion of Rate	CARE Administration Portion of Rate	LIEE Program Portion of Rate	LIEE Administration Portion of Rate	Total CARE/LIEE Surcharge	Average Rate Including CARE/LIEE Surcharge
Residential (non CARE)	16.00	0.52	0.01	0.08	0.01	0.62	16.62
Residential (CARE)	8.58	0.00	0.00	0.08	0.01	0.09	8.66
Commercial	15.45	0.52	0.01	0.08	0.01	0.62	16.07
Industrial	11.36	0.52	0.01	0.07	0.01	0.60	11.97
Agricultural	12.57	0.52	0.01	0.07	0.01	0.60	13.18
Lighting	15.54	0.02	0.00	0.09	0.01	0.11	15.66
System	13.15	0.48	0.01	0.07	0.01	0.57	13.71

PY 2010	Average Rate Excluding CARE/LIEE Surcharge	CARE Subsidy Portion of Rate	CARE Administration Portion of Rate	LIEE Program Portion of Rate	LIEE Administration Portion of Rate	Total CARE/LIEE Surcharge	Average Rate Including CARE/LIEE Surcharge
Residential (non CARE)	16.00	0.52	0.01	0.11	0.01	0.65	16.65
Residential (CARE)	8.54	0.00	0.00	0.11	0.01	0.12	8.66
Commercial	15.45	0.52	0.01	0.12	0.01	0.65	16.11
Industrial	11.36	0.52	0.01	0.09	0.01	0.63	11.99
Agricultural	12.57	0.52	0.01	0.09	0.01	0.63	13.20
Lighting	15.54	0.02	0.00	0.12	0.01	0.15	15.69
System	13.15	0.48	0.01	0.10	0.01	0.59	13.74

PY 2011	Average Rate Excluding CARE/LIEE Surcharge	CARE Subsidy Portion of Rate	CARE Administration Portion of Rate	LIEE Program Portion of Rate	LIEE Administration Portion of Rate	Total CARE/LIEE Surcharge	Average Rate Including CARE/LIEE Surcharge
Residential (non CARE)	16.00	0.52	0.01	0.12	0.01	0.66	16.66
Residential (CARE)	8.54	0.00	0.00	0.11	0.01	0.12	8.66
Commercial	15.45	0.52	0.01	0.12	0.01	0.66	16.11
Industrial	11.36	0.52	0.01	0.09	0.01	0.63	12.00
Agricultural	12.57	0.52	0.01	0.09	0.01	0.63	13.21
Lighting	15.54	0.02	0.00	0.13	0.01	0.15	15.70
System	13.15	0.48	0.01	0.11	0.01	0.60	13.75

PY 2008 Current 5/1/2008 Rates	Average Rate Excluding CARE/LIEE Surcharge	CARE Subsidy Portion of Rate	CARE Administration Portion of Rate	LIEE	Total CARE/LIEE Surcharge	Average Rate Including CARE/LIEE Surcharge
Residential (non CARE)	16.00	0.52	0.01	0.07	0.60	16.60
Residential (CARE)	8.59	0.00	0.00	0.07	0.07	8.66
Commercial	15.45	0.52	0.01	0.08	0.60	16.06
Industrial	11.36	0.52	0.01	0.06	0.59	11.95
Agricultural	12.57	0.52	0.01	0.06	0.59	13.16
Lighting	15.54	0.02	0.00	0.08	0.10	15.64
System	13.15	0.48	0.01	0.07	0.55	13.70

PY 2009 - 2011 CARE and LIEE Rate Impacts - Gas (cents/Therm) **Pacific Gas and Electric Company**

PY 2009	Average Rate Excluding CARE/LIEE Surcharge	CARE Subsidy Portion of Rate	CARE Administration Portion of Rate	LIEE Program Portion of Rate	LIEE Administration Portion of Rate	Total CARE/LIEE Surcharge	Average Rate Including CARE/LIEE Surcharge
Residential (non CARE)	\$1.338	\$0.022	\$0.000	\$0.013	\$0.001	\$0.037	\$1.375
Residential (CARE)	\$1.074	\$0.000	\$0.000	\$0.013	\$0.001	\$0.015	\$1.088
Core Small Commercial	\$1.183	\$0.022	\$0.000	\$0.007	\$0.001	\$0.030	\$1.213
Core Large Commercial	\$0.955	\$0.022	\$0.000	\$0.015	\$0.001	\$0.039	\$0.994
Noncore Industrial Distribution	\$0.112	\$0.022	\$0.000	\$0.004	\$0.000	\$0.027	\$0.139
Noncore Industrial Transmission	\$0.024	\$0.022	\$0.000	\$0.002	\$0.000	\$0.025	\$0.049
Noncore Industrial Backbone	\$0.010	\$0.022	\$0.000	\$0.002	\$0.000	\$0.025	\$0.035
Agricultural (1)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Lighting (2)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
System (3)	N/A	N/A	N/A	N/A	N/A	N/A	N/A

PY 2010	Average Rate Excluding CARE/LIEE Surcharge	CARE Subsidy Portion of Rate	CARE Administration Portion of Rate	LIEE Program Portion of Rate	LIEE Administration Portion of Rate	Total CARE/LIEE Surcharge	Average Rate Including CARE/LIEE Surcharge
Residential (non CARE)	\$1.338	\$0.022	\$0.000	\$0.018	\$0.001	\$0.042	\$1.380
Residential (CARE)	\$1.074	\$0.000	\$0.000	\$0.018	\$0.001	\$0.020	\$1.093
Core Small Commercial	\$1.183	\$0.022	\$0.000	\$0.010	\$0.001	\$0.033	\$1.216
Core Large Commercial	\$0.955	\$0.022	\$0.000	\$0.020	\$0.002	\$0.044	\$0.999
Noncore Industrial Distribution	\$0.112	\$0.022	\$0.000	\$0.006	\$0.000	\$0.029	\$0.141
Noncore Industrial Transmission	\$0.024	\$0.022	\$0.000	\$0.003	\$0.000	\$0.026	\$0.050
Noncore Industrial Backbone	\$0.010	\$0.022	\$0.000	\$0.003	\$0.000	\$0.026	\$0.036
Agricultural	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Lighting	N/A	N/A	N/A	N/A	N/A	N/A	N/A
System	N/A	N/A	N/A	N/A	N/A	N/A	N/A

PY 2011	Average Rate Excluding CARE/LIEE Surcharge	CARE Subsidy Portion of Rate	CARE Administration Portion of Rate	LIEE Program Portion of Rate	LIEE Administration Portion of Rate	Total CARE/LIEE Surcharge	Average Rate Including CARE/LIEE Surcharge
Residential (non CARE)	\$1.338	\$0.022	\$0.000	\$0.019	\$0.002	\$0.043	\$1.381
Residential (CARE)	\$1.074	\$0.000	\$0.000	\$0.019	\$0.002	\$0.020	\$1.094
Core Small Commercial	\$1.183	\$0.022	\$0.000	\$0.010	\$0.001	\$0.033	\$1.217
Core Large Commercial	\$0.955	\$0.022	\$0.000	\$0.021	\$0.002	\$0.045	\$1.000
Noncore Industrial Distribution	\$0.112	\$0.022	\$0.000	\$0.006	\$0.000	\$0.029	\$0.141
Noncore Industrial Transmission	\$0.024	\$0.022	\$0.000	\$0.003	\$0.000	\$0.026	\$0.050
Noncore Industrial Backbone	\$0.010	\$0.022	\$0.000	\$0.003	\$0.000	\$0.026	\$0.036
Agricultural	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Lighting	N/A	N/A	N/A	N/A	N/A	N/A	N/A
System	N/A	N/A	N/A	N/A	N/A	N/A	N/A

- PG&E does provide gas rate schedules for agricultural service.
 PG&E does not provide gas rate schedules for lighting service.
 Not applicable due to varying levels of procurement, storage and transmission unbundling between gas customer classes.

Attachment C-2

PY 2007 Customer Usage Pacific Gas and Electric Company

		Electric				Gas				
		Total	Tier 1	Tier 2	Tier 3	Tier 4	Tier 5	Total	Below Baseline	Above Baseline
Number of CARE	2007 Total									
Customers 1	January	931,701	396,537	136,114	211,340	122,987	64,723	824,195	368,377	455,818
	February	936,328	454,125	141,674	200,487	99,701	40,341	828,383	535,838	292,545
	March	934,390	504,088	142,081	183,983	78,541	25,697	823,207	475,546	347,661
	April	927,859	478,835	145,576	190,500		28,975	815,272	227,034	588,238
	May	928,501	463,779	145,760	195,275	90,878	32,809	808,007	328,755	479,252
	June	923,736	422,420	143,027	207,410	109,973	40,906	797,260	416,428	380,832
	July	922,809	385,634	137,714	214,317	130,132	55,012	792,086	465,328	326,758
	August	930,245	383,945	138,966	217,965	133,360	56,009	796,165	468,484	
	September	934,000	445,144	146,233	205,094	102,267	35,262	803,201	428,940	374,261
	October	933,869	508,160	145,062	180,678	75,504	24,465		299,334	520,492
	November	928,471	445,133		206,376	97,844				
	December	923,772	396,900	135,395	211,958	123,078	56,441	820,328		,
•								1		
		Total	Tier 1	Tier 2	Tier 3	Tier 4	Tier 5	Total	Below Baseline	Above Baseline
Number of	2007 Total			Tier 2			Tier 5	lotal	Below Baseline	Above Baseline
Number of Customers	January	48,284	19,619	7,488	11,470	6,447	3,260	45,451	20,941	24,510
Customers	January February	48,284 48,978	19,619 23,111			6,447 5,158	3,260 1,877	45,451 46,063	20,941 30,654	24,510 15,409
	January February March	48,284 48,978 49,546	19,619 23,111 26,473	7,488 7,872 8,006	11,470 10,960 10,031	6,447 5,158 3,954	3,260 1,877 1,082	45,451 46,063 46,302	20,941 30,654 27,326	24,510 15,409 18,976
Customers	January February March April	48,284 48,978 49,546 49,949	19,619 23,111 26,473 25,984	7,488 7,872 8,006 8,264	11,470 10,960 10,031 10,268	6,447 5,158 3,954 4,216	3,260 1,877 1,082 1,217	45,451 46,063 46,302 46,492	20,941 30,654 27,326 12,489	24,510 15,409 18,976
Customers	January February March April May	48,284 48,978 49,546 49,949 50,388	19,619 23,111 26,473 25,984 25,386	7,488 7,872 8,006 8,264 8,301	11,470 10,960 10,031 10,268 10,822	6,447 5,158 3,954 4,216 4,521	3,260 1,877 1,082 1,217 1,358	45,451 46,063 46,302 46,492 46,432	20,941 30,654 27,326 12,489 18,191	24,510 15,409 18,976 34,003 28,241
Customers	January February March April May June	48,284 48,978 49,546 49,949 50,388 50,664	19,619 23,111 26,473 25,984 25,386 23,180	7,488 7,872 8,006 8,264 8,301 8,410	11,470 10,960 10,031 10,268 10,822 11,680	6,447 5,158 3,954 4,216 4,521 5,610	3,260 1,877 1,082 1,217 1,358 1,784	45,451 46,063 46,302 46,492 46,432 46,229	20,941 30,654 27,326 12,489 18,191 23,195	24,510 15,409 18,976 34,003 28,241 23,034
Customers	January February March April May June July	48,284 48,978 49,546 49,949 50,388 50,664 50,780	19,619 23,111 26,473 25,984 25,386 23,180 21,281	7,488 7,872 8,006 8,264 8,301 8,410 8,060	11,470 10,960 10,031 10,268 10,822 11,680 12,278	6,447 5,158 3,954 4,216 4,521 5,610 6,828	3,260 1,877 1,082 1,217 1,358 1,784 2,333	45,451 46,063 46,302 46,492 46,432 46,229 46,054	20,941 30,654 27,326 12,489 18,191 23,195 26,303	24,510 15,409 18,976 34,003 28,241 23,034 19,751
Customers	January February March April May June July August	48,284 48,978 49,546 49,949 50,388 50,664 50,780 50,756	19,619 23,111 26,473 25,984 25,386 23,180 21,281 21,302	7,488 7,872 8,006 8,264 8,301 8,410 8,060 8,014	11,470 10,960 10,031 10,268 10,822 11,680 12,278 12,404	6,447 5,158 3,954 4,216 4,521 5,610 6,828 6,735	3,260 1,877 1,082 1,217 1,358 1,784 2,333 2,301	45,451 46,063 46,302 46,492 46,432 46,229 46,054 45,905	20,941 30,654 27,326 12,489 18,191 23,195 26,303 26,159	24,510 15,409 18,976 34,003 28,241 23,034 19,751 19,746
Customers	January February March April May June July	48,284 48,978 49,546 49,949 50,388 50,664 50,780 50,756	19,619 23,111 26,473 25,984 25,386 23,180 21,281 21,302 24,849	7,488 7,872 8,006 8,264 8,301 8,410 8,060 8,014 8,164	11,470 10,960 10,031 10,268 10,822 11,680 12,278 12,404 11,069	6,447 5,158 3,954 4,216 4,521 5,610 6,828 6,735 4,978	3,260 1,877 1,082 1,217 1,358 1,784 2,333 2,301 1,477	45,451 46,063 46,302 46,492 46,432 46,229 46,054 45,905 45,936	20,941 30,654 27,326 12,489 18,191 23,195 26,303 26,159 24,146	24,510 15,409 18,976 34,003 28,241 23,034 19,751 19,746 21,790
Customers	January February March April May June July August September October	48,284 48,978 49,546 49,949 50,388 50,664 50,780 50,756 50,537 50,081	19,619 23,111 26,473 25,984 25,386 23,180 21,281 21,302 24,849 28,249	7,488 7,872 8,006 8,264 8,301 8,410 8,060 8,014 8,164 7,586	11,470 10,960 10,031 10,268 10,822 11,680 12,278 12,404 11,069 9,363	6,447 5,158 3,954 4,216 4,521 5,610 6,828 6,735 4,978 3,845	3,260 1,877 1,082 1,217 1,358 1,784 2,333 2,301 1,477 1,038	45,451 46,063 46,302 46,492 46,432 46,229 46,054 45,905 45,936 45,990	20,941 30,654 27,326 12,489 18,191 23,195 26,303 26,159 24,146 16,343	24,510 15,409 18,976 34,003 28,241 23,034 19,751 19,746 21,790 29,647
Customers	January February March April May June July August September	48,284 48,978 49,546 49,949 50,388 50,664 50,780 50,756	19,619 23,111 26,473 25,984 25,386 23,180 21,281 21,302 24,849 28,249 24,766	7,488 7,872 8,006 8,264 8,301 8,410 8,060 8,014 8,164 7,586 7,808	11,470 10,960 10,031 10,268 10,822 11,680 12,278 12,404 11,069	6,447 5,158 3,954 4,216 4,521 5,610 6,828 6,735 4,978 3,845 4,739	3,260 1,877 1,082 1,217 1,358 1,784 2,333 2,301 1,477 1,038	45,451 46,063 46,302 46,492 46,432 46,229 46,054 45,905 45,936 45,990 45,883	20,941 30,654 27,326 12,489 18,191 23,195 26,303 26,159 24,146 16,343	24,510 15,409 18,976 34,003 28,241 23,034 19,751 19,746 21,790 29,647 24,604

¹ Excludes master-metered and solar customers. This total shows the highest tier reached each month by all customers on CARE that month.

² This total shows the highest tier reached by each customer treated by LIEE in 2007 (regardless of which month they were counted as treated). Total number of 2007 LIEE customers fluctuates monthly due to customers moving into or out of LIEE-treated residences. Total does not include master-metered customers.

Attachment C-3

PY 2009-2011 Projected Customer Usage and Eligibility Pacific Gas and Electric Company

		PY 2007	PY 2009 ²	PY 2010 ²	PY 2011 ²
		Number of CARE Customers in PY2007 ¹	Number of Customers Treated by LIEE in PY 2009 ³	Number of Customers Treated by LIEE in PY	Number of Customers Treated by LIEE in PY 2011 3
Electric	Tier 1 *	243,820			
	Tier 2 *	121,209	28,560	39,270	39,270
	Tier 3 *	223,577	19,040	26,180	26,180
	Tier 4 *	158,200			
	Tier 5 *	67,229	20,400	28,050	28,050
	Total	814,035	68,000	93,500	93,500
Gas	Tier 1 (Below Baseline) *	162,139	17,480	24,035	24,035
	Tier 2 (Above Baseline) *	553,147	58,520	80,465	80,465
	Total	715,286	76,000	104,500	104,500

^{*} PG&E proposes to combine electric customer usage into 3 usage levels to determine their LIEE participation for 2009-2011. Electric Tiers 1-2 (or all customers below 130% of baseline) are Low Users; customers between 131% and 200% of baseline (Tier 3) are Medium Users; and customers above 200% (Tiers 4-5) are High Users. Gas customer participation in LIEE is based on Gas Tier 1 or 2 usage. Customer Tier usage is defined as the highest tier reached two times or more in the previous 12-month period. These projected targets are PG&E's best estimates.

¹ CARE customers from February 2007-March 2008. Excludes master-metered customers, solar customers, and customers with less than six months of usage.

² PY2007 CARE customers are listed here as a proxy for LIEE willing and eligible customers. The LIEE baseline of willing and eligible customers is determined by the methodology described in Section III.A of the LIEE 2009-2011 testimony. Willing and eligible customer methodology is also described in Table A-3.

³ Gas and Electric customer totals include gas-only, electric-only and gas-and-electric-combination customers. Therefore, the totals for each are not additive.

PACIFIC GAS AND ELECTRIC COMPANY APPENDIX D

Attachment A.10-01

LIEE Microwaves – Meals on Wheels Program Implementation Plan

1. Pilot or Study Budget Table

Years	Units	Per Unit	Cost
2009	1500	@ \$50 per unit	\$75,000
2010	1500	@ \$60 per unit	\$90,000
2011	2000	@ \$60 per unit	\$120,000

2. Projected Pilot Impacts Table

Appliance	Temperature	Time	Energy	Cost
Electric Oven	350	1 hour	2.0 kWh	\$.16
Electric Convection Oven	325	45 minutes	1.39 kWh	\$.11
Gas Oven	350	1 hour	.112 therm	\$.07
Electric Frying Pan	420	1 hour	.9 KWh	\$.07
Toaster Oven	425	50 minutes	.95 kWh	\$.08
Electric Crockpot	200	7 hours	.7 kWh	\$.06
Microwave Oven	"High"	15 minutes	.36 kWh	\$.03

[&]quot;This table from the Consumer Guide to Home Energy Savings compares the cost of cooking a casserole in several ways. It assumes the cost of gas is \$.60 a therm, and electricity is \$.08 a kWh." (California Energy Commission - consumerenergycenter.org)

The Meals on Wheels program delivers one hot meal daily and two frozen meals on Fridays for weekend consumption in most areas. In some far reaching rural counties all meals are delivered frozen once per week. The interim energy savings values are based on seven meals a week, 365 meals a year and are preliminary until the conclusion of this pilot where an M & E Study can be completed.

3. Brief Pilot or Study Description

"Microwave ovens use less energy (up to 80% less) than conventional ovens. In addition to saving energy, microwave ovens generally cook food much faster, and don't generate as much heat in your kitchen, so you could save on air conditioning costs during the summer. However, microwaves aren't appropriate for all cooking, for example, they can cook food unevenly and they can't brown food. Microwaves are especially good for small portions and leftovers." (energystar.gov, answer ID 3026, 3/12/07)

Microwave ovens are not well suited to cooking large-sized portions, and full-size ovens don't efficiently cook small qualities of food. The primary objective of this pilot project is to work with the Meals on Wheels Program in local communities to install energy saving microwaves. Microwave ovens will be installed in customer homes (seniors and disabled) that are already enrolled in the Meals on Wheels for program years 2009-2011. Our goal will be to install up to 5,000 microwave oven units in program years 2009-2011. The Microwaves-Meals on Wheels pilot program focuses on the elderly, homebound, frail or at-risk population and contributes to their overall well being by providing new microwave ovens to heat their prepackaged or frozen meal.

4. Pilot or Study Rationale and Expected Outcome

Microwave ovens impact both total energy use and demand. Therefore, the expected outcome will produce energy savings for seniors and disabled customers that will result in lower energy bills and less demand on the grid. Additionally, the coordination with local community Meals on Wheels programs applies to the 2009-2011 LIEE integration efforts.

5. Pilot or Study Implementation

We will be partnering with the Meals on Wheels program to solicit customers who may benefit from a microwave where they currently don't have one. We will also take this opportunity to serve these customers through the LIEE Program. We are still determining which organization will deliver and install the new microwave. The installation company will inform the customer on how to operate the microwave. PG&E is also looking in to different styles of microwaves that creates an ease of functionality to best meet the customer needs.

Attachment A.10-02

LIEE Pilot for East Bay Habitat for Humanity

1. Pilot or Study Budget Table

2009	\$100,000
2010	\$100,000
2011	\$100,000

2. Projected Pilot Impacts Table

Energy Savings for this pilot will be based on the specific measures that are installed in each home.

3. **Brief Pilot Description**

Partner with Habitat for Humanity to promote energy efficiency for low income customers. PG&E anticipates negotiating a third party contract with Habitat for Humanity (HFH) to provide LIEE services to customers that qualify for both LIEE and HFH projects.

4. Pilot Rationale and Expected Outcome

This pilot project will allow Habitat for Humanity homes to receive energy efficient measures. Since these are low income homes, this will assist families by lowering their energy usage and monthly energy bills. The families will also receive an energy education so that they can learn how to read their bills and other ways they can conserve energy.

5. Pilot Implementation

PG&E will utilize the PG&E training center to provide training on installation of weatherization measures, marketing and education.

The process flow will be as follows:

- -HFH will locate homes that fit their rehabbing efforts
- -HFH will verify and qualify the customer into the LIEE program
- -Provide LIEE Marketing and Education
- -Provide the installation of LIEE weatherization measures
- -Provide the installation of HFH measures
- -Promote the home as a LIEE and HFH effort
- -Invoice PG&E for all work within the normal LIEE invoicing process

Along with these above efforts, PG&E will also provide a community blitz effort to neighboring customers of the HFH effort and provide the LIEE and CARE programs.

Attachment A.10-03

City of San Jose Partnership (Silicon Valley Energy Watch, City of San José Housing Department, and City of San José Strong Neighborhoods)

PG&E LIEE Leveraging Pilot Project Implementation Plan

1. Pilot or Study Budget Table

Years	Units	Cost
2009	-	-
2010	-	-
2011	-	-

2. Projected Pilot Impacts Table

Work in progress

3. Brief Pilot or Study Description

Expand community awareness about (1) energy efficiency and (2) PG&E LIEE resources in San José Strong Neighborhood Initiative, particularly among minority and English Language-learning groups. Help connect eligible residents in the Strong Neighborhood Initiative (SNI) with PG&E's LIEE resources. Educate San José Strong Neighborhood Initiative residents about environmental sustainability generally, and energy efficiency specifically. Compliment two existing City of San José neighborhood programs that currently focus on multi-family housing and issues of health and safety. This program will allow the City of San José and PG&E to partner in meeting a community need. This partnership will provide a comprehensive approach to community well-being and sustainability that brings together physical safety, economic security, empowerment, and environmental sustainability. All of these must be enacted at the individual and community levels simultaneously in order to be successful.

4. Pilot or Study Rationale and Expected Outcome

Marketing Component: all marketing will be tri-lingual (English, Spanish, and Vietnamese) and other languages where needed, as determined by the Strong Neighborhood Initiative staff. Modes of outreach: Direct mailings will be sent to residents, explaining the LIEE program and the partnership between the City of San José and PG&E to expand the program's reach. This will include application and follow up instructions. Neighborhood community meeting presentations + Sign up on site: Trained Strong Neighborhood Initiative staff and community leaders, as well as PG&E LIEE staff, will discuss the program, answer

questions, and have materials for residents and property owners to sign up on site. Existing marketing infrastructure: neighborhood block captains, monthly neighborhood meetings, newsletters from schools, and community events will serve as forums to educate residents about energy efficiency and market the program. The project will provide an educational component (one or more) by working with PG&E's Energy Training Center to develop a list of common energy efficiency measures, their associated energy savings, and financial payback timelines. This should be developed in the three major languages (English, Spanish, and Vietnamese) and will be included in the original mailings as well as available at related events. Possibly include one or more Demonstration Homes: ask residents who utilize the program to offer their electric bills one year prior and one year post measures, and thereafter present the results to the community. Neighborhood case studies and testimonials should be available from residents who complete the program. Hold one environment fair per neighborhood. Include articles about energy efficiency and environmental sustainability (climate change, water conservation, automobile maintenance for improved fuel efficiency. etc) into existing community and school newsletters. Establish neighborhood-wide KWH reduction goals and report on their progress. Include an environmental component in other community events, such as National Night Out and neighborhood cleanups. Combine with other Green elements – e.g. the City of San José Code Enforcement program is dispensing \$1,000 grants (recipients must have volunteers) to take out lawns and put in native / drought resistant plants.

5. Pilot or Study Implementation

The program will have a three-year reach, focusing on two neighborhoods per year. Project Alliance and Pilot Areas: These six neighborhoods represent two ongoing projects of targeted, comprehensive neighborhood revitalization. Project Alliance neighborhoods are Jeanne/Forestdale, Virginia/King, and Roundtable; Pilot Area neighborhoods are Seven Trees, Silver Leaf, and Hillsdale/Camden. City and Redevelopment Agency staff have extensive relationships with residents and community leaders in these neighborhoods, and are familiar with the neighborhoods' strengths and weaknesses. Eligibility Gap filling: for the many residents who are ineligible for the LIEE program due to income limits, the City of San José Housing Department, Silicon Valley Energy Watch, and the Community Action Agency of San Mateo will partner to develop measures and a program that will meet many of these households' energy efficiency needs. This two-tiered program will help to create a seamless Residential Energy Efficiency System of Care for low income residents. In terms of finished product, residents should not know the difference between having measures installed by PG&E or by the affiliate City of San Jose program. This will help to make the pilot a more equitable project, but will not impact the reliability of the LIEE component. Questions and considerations: ask about Duplexes and make sure everything that's switched out is taken back (e.g. old refrigerators).

Attachment A.10-04

LIEE Group Energy Education Workshop Project Implementation Plan

1. Pilot or Study Budget Table

Years	Units	Cost
2009	1500	\$202,500
2010	1750	\$253,125
2011	2000	\$303,750

2. Projected Pilot Impacts Table

As part of the 2008 energy education pilot program, PG&E has requested that each community organization create and submit to PG&E a participant survey to collect data, (i.e. demographic, account information) so that in the future, PG&E may be able to conduct an evaluation or study to determine workshop energy savings. At the conclusion of the 2008 pilot, PG&E hopes to receive the necessary funding to complete an M&E study.

3. Brief Pilot Description

For program year 2008, the LIEE team has contracted with three local community based organizations to pilot the Energy Education workshop program, these agencies are: Glenn County Human Services Agency, Redwood Community Action Agency and Amador-Tuolumne Community Action Agency. For program years 2009-2011 PG&E would like to expand this pilot to any community based organizations that would like to participate in this program. The energy education workshops will determine whether or not energy education outreach is a viable energy conservation measure for inclusion in the Energy Partners program. The energy education pilot focuses on rural areas or counties where the need exceeds the capability of both the LIHEAP agency and the Energy Partners program on an annual basis. Participating in these workshops does not preclude a customer from participating in either program. Our goal will be to provide energy education to 5000 customers for program years 2009-2011.

4. Pilot Rationale and Expected Outcome

The workshops shall address customers' energy usage, utility bill assessment and energy saving practices. The objective is to have participants adopt energy saving behaviors which results in lowering their energy bills. Additionally, the coordination with local community organizations applies to the 2009-2011 LIEE integration efforts.

5. Pilot Implementation

PG&E will conduct training at the PG&E Energy Training Center for all participating organizations. Through a 'Train the Trainer' program, participants will deliver training throughout their community organizations and begin conducting energy education workshops with PG&E customers. Each organization shall have up to six of its employees who have been designated as trainer and recruiter attend a PG&E one day train the trainer class designed to provide trainers with the tools to introduce energy education and low cost energy efficiency measures to low-income families. PG&E will inform all organizations of date, time and location of training class. Organizations shall only have their staff members who have successfully completed the PG&E training class recruit participants in their service areas for the workshops and then conduct workshops.

Organizations shall conduct the workshops at their facilities using the PG&E-approved course curriculum from the Action Plan. Organizations shall utilize PG&E brochures and visual aids during the workshops. At the conclusion of each workshop, organizations shall provide each household participant a PG&E reusable tote bag. Organizations shall have participants complete and return the Participant Survey at the end of each workshop.

6. Evaluation

Each participating community based organization is surveying energy education participants to collect data, i.e. demographic and account information. PG&E believes that appropriately delivered energy education helps customers lower bills and reduce greenhouse gas emissions by teaching them how they can take control of their own energy usage. PG&E already delivers in-house energy education as part of the LIEE program portfolio of services.

As part of this Application, PG&E is proposing to study energy education and behavior change in a joint utility study. Survey information gathered by the Group Education CBOs will be available to study consultants as they perform the statewide study. The results of this study will help PG&E enhance curriculum and training for group education.

Attachment A.10-05

ON-LINE (OFF-SITE) PG&E LIEE/ENERGY PARTNERS TRAINING PILOT STUDY

1. Projected Budget Table

Years	Cost
2009	\$150,000
2010	\$150,000
2011	\$150,000

2. Projected Impacts

Projected program impacts are contingent upon funding through the CPUC and final design criteria. Goal of the pilot is to explore what LIEE training conducted on-site at the PG&E Energy Training Center in Stockton California can be moved to a web-based and/or off-site curriculum.

3. Brief Description Including Support of Long Term Strategic Plan

Program Summary

In support of the Long-Term Strategic Plan's vision that "By 2020, California's LIEE workforce is trained and engaged to provide the human capital necessary to achieve California's economic energy efficiency and demand-side management potential," PG&E hopes to implement a variety of field staff development strategies that encourage and nurture the development of green collar jobs and attitudes through a new Workforce Development strategy.

This program will be integrated into the current LIEE PG&E Energy Partners Program Energy Specialists Certification Training. Specifically the pilot will allow evaluation of the effectiveness of selected topics for on-line training in lieu of sending all students to a single location for all elements of the certification program. The integration of an on-line training component may prove to be a potential savings to the participating Energy Partners contractor with regards to the costs associated with the training of the energy specialist. The ETC will continue to be the source for on-site laboratory, workshop, and materials driven training.

Strategic Plan Actions

Upon acceptance of the pilot program contract the selected software developer will deliver a beta version of the training within 120 days for testing purposes. Software content will be determined by the ETC training staff, invited participants such as PG&E or other utility program managers or the EPP administrator, and the developer. This pilot is estimated to last 6 months from the date of implementation.

4. Rationale and Expected Outcome

Energy Partners today faced with an unprecedented challenge: provide by the year 2020 an outreach effort that will touch all identified low income households. Additionally the program needs to accomplish the outreach in fiscally responsible manner. The sheer number of contacts requires reevaluation of the current training and delivery by Energy Specialists in hopes of achieving this goal.

Based upon the diverse Energy Specialist candidates on-line training will allow the individual to absorb the required material at their speed of comprehension.

PG&E's Energy Training Center – Stockton (ETC) will continue to play a key role in the Energy Education Specialists training, building upon it's current role as a provider of high quality and objective classes that focus on specific, state of the art strategies for reducing energy use by the low income residential customer.

The Energy Partners Program is expected to enroll, educate and weatherize more and more units yearly to satisfy the 2020 target goals. On-line off-site certification training could potentially free up space on the ETC calendar allowing for additional classes in the program year.

As this is a pilot project the outcome is unknown. It is, however, expected that the knowledge gained will provide guidance and direction for syllabus and curriculum development for the next generation on-line training that may be a required element of Energy Partners Energy Specialist certification training.

5. Implementation

The intent is to simultaneously run the on-line pilot (beta version) and the current certification training. Certification students enrolled in a class with the on-line element will also attend the ETC for appropriate sessions that require use of the extensive labs, props, and materials unique to the facilities. Student success with the on-line training will be evaluated through observation and performance during their participation in the ETC portion of the certification training.

On-line students will be given a finite amount of time (to be determined) to complete the assignments and take, and pass the quizzes and finals. Quizzes will be topic specific. The final exam or exams will be based on the quizzes. Final exam pass rate will be 70% as is with current and historical standards followed in the Energy Specialist Certification Training. Different methods of proctoring final exam or exams will be explored to ensure accuracy and student compliance.

PG&E will play an integral roll in this assessment, which will identify areas of training infrastructure and capacity, as well as help in anticipating future program training and delivery needs.

6. Marketing, Education and Outreach

This pilot education project will be extended to a sampling of current Energy Partners contactors. Both private contractors and community based organizations (CBOs) will be invited to join the pilot. Those contractors selected will be expected to be proactive in the ongoing development of the pilot, including but not limited to review of on-line material with students, experiences with the training, and suggesting for modifications.

Attachment A.10-06 City of San Joaquin (Fresno County) Portfolio Implementation Plan – LIEE Pilot Project

1. Projected Program Budget Table

	Non-		
	Resource	Resource	
		Direct Install (Labor + Materials +	
	Admin	Education + Marketing)	Total
2009	20,000	144,000	164,000
2010	20,000	144,000	164,000
2011	10,000	72,000	82,000
2009-2011			
Total	50,000	350,000	410,000

2. Projected Program Impacts Table

Projected kW (summer peak, noncoincident peak, peak reduction using load factor per savings goals), KWh and Therm impacts (all net and by calendar year)

	kW	kWh	Therms
2009	31.80	125,650	4574.8
2010	31.80	125,650	4574.8
2011	15.90	62,825	2287.4
2009-11			
Total	79.50	314,125	11,437

Unit Goal -

2009- 200 dwellings

2010- 200 dwellings

2011- 100 dwellings

3. Brief Pilot Description

The San Joaquin Pilot Project (SJPP) was developed in response to the directive by the CPUC Decision that all eligible customers should be given the opportunity to participate in Low Income Energy Efficiency (LIEE) programs by 2020. Targeting the hardest-to-reach in rural communities, the SJPP is a low-income energy efficiency pilot project between Pacific Gas and Electric (PG&E) and the City of San Joaquin (City) of Fresno County. The goal of this leveraging project is to demonstrate the

effectiveness of a city-utility partnership model that empowers rural municipal governments, with hard-to-reach low-income customers, to take a leadership role in integrating utility energy efficiency programs and services into their portfolio of city services, resulting in increased participation, education and awareness, and municipal leadership.

The SJPP objectives include increasing LIEE residential direct install participation, and creating behavioral change. The strategic initiatives to be employed to achieve the goal and objectives include Residential Direct Installation, Training and Education, and Funneling.

4. Pilot Rationale and Expected Outcomes

The City is a small, closely knit, rural community in the Central Valley. The majority of its 3,623 residents are of Hispanic descent, many of which are non-English speakers and agricultural workers. Additionally, there is a high rate of poverty, low rates of high school graduation, and a small tax base with which to finance community public services. These characteristics have traditionally served as barriers.

PG&E's existing programs have had notable success over the past decade, nearly 50% penetration of residential dwellings by LIEE efforts. Many of these homes were reached up to 10 years ago and are now eligible for the next generation of efficiency upgrades. The SJPP will focus on reaching the hardest to reach, who have not responded to traditional marketing, outreach and lead generation methods. This involves tapping into the unique relationships of the City Manager, local community members, Health Clinic, School District, churches and services groups.

This pilot project proposes a means of addressing these barriers and reaching the remaining eligible LIEE customers. Through local official leadership and community leader support, this model provides PG&E the opportunity to leverage existing city resources to increase awareness levels and recruit greater participation. In addition, the program proposes the identification and training of local residents to assist contractors in completing the local audit program, while providing a means to sustain the city's energy service needs beyond the implementation period of this program.

5. Implementation

The City of San Joaquin's "City Rehabilitation Project" will be an instrumental part in the implementation of this pilot project. This rehabilitation project, funded through State CDBG grant funds, will utilize a local contractor to perform residential retrofits, installing utility approved energy efficiency measures into residential homes. Contractors working in the rehabilitation project will work with PG&E's LIEE team to implement the residential direct install program. Consistent with the LIEE standards, the contractor will address specific end-use requirements such as

weatherization, lighting, HVAC systems, attic insulation and water heating and also provide energy education and address safety issues.

PG&E will certify the contractor prior to any work performed. This will require utilizing existing PG&E training programs for contractor certification. This will ensure that services provided meet the same standards required and upheld by other PG&E contractors. All Energy Efficiency measures installed through this pilot will be installed and inspected according to the existing Policies and Procedures, and statewide LIEE Installation Standards (LIS) manual.

With a city unemployment rate of 27%, workforce investment and training opportunities are essential to building the local capacity for sustainability. As the pilot project progresses, the contractor will work with the City to identify local residents to become apprentices. These residents will be trained through PG&E to assist in the implementation of the residential direct installation efforts under this project.

ME&O will also play a key role in this pilot project and will be implemented through the San Joaquin Energy Partnership program. Through the assistance of local organizations such as the Los Promodores, the City will take the leadership in educating residents and increasing awareness on energy efficiency services provided under the LIEE program. In addition, working with PG&E, the City will use local channels and resources to distribute energy education material to residents. Through City council meetings, community events and neighborhood gatherings, the City will collaborate with local officials and community energy champions to advance the energy efficiency message and increase overall knowledge-base levels within the City.

In an effort to deliver integrated energy services, this pilot project will use a combination of energy education and direct installation of energy efficient technologies. As a low income city, the financial resources available to residents to fully embrace energy efficiency are limited. This will be the first step in instilling an energy ethic into the community, which in the long run will lead to behavioral modification on a community wide basis.

Attachment A.10-07

LIEE High Efficiency Clothes Washer Pilot Implementation Plan

1. Pilot or Study Budget Table

Planned Units installed in 2009	Cost per unit (installation, delivery and recycling of old unit included)	Total Budget
1000	\$750	\$750,000

2. **Projected Pilot Impacts Table**

Savings Table Standard washer High Efficiency Washer		High Efficiency Washer
Water Usage Per Load	41 Gallons	23 Gallons
Gas Usage Per Load	.08 Therms	.05 Therms
Electric Usage Per load	0.21 KWh	0.14 KWh

Source:

http://www.energystar.gov/ia/business/bulk_purchasing/bpsavings_calc/CalculatorConsumerClothesWasher.xls

Water Savings:

The single best thing you can do to improve clothes washer efficiency is to replace an old inefficient machine with a new high efficiency washer. Traditional clothes washers use approximately 41 gallons per load (gpl) while high efficiency machine use only 23 gpl. This equates to an average savings of 7,000 gallons of water a year. Over the eleven-year life of the washer, that's enough water to provide a lifetime of drinking water for six people.

Energy Savings:

Electric: A standard Clothes Washing machine uses 420 KWh/year. A HE2 Clothes washing machine uses an average of 165 KWh per year. This equates to an average savings of 259 KWh per year for each washer replaced.

Gas: A standard Clothes Washing machine uses .08 Therms/load. A HE2 Clothes washing machine uses an average of .05 Therms/load. This equates to an average savings of .03 Therms per load. The average family runs 7.5 loads per week.

Air Pollution:

There is a reduction of 435 lbs. of CO² over the life of a single HE Clothes Washer.

3. **Brief Pilot or Study Description**

The LIEE High Efficiency Clothes Washer Pilot will target single family homes that are enrolled in the LIEE program in year 2009. It will be available to homeowners with a household of 5 or more people. A specific area will be identified for this pilot. That area is yet to be determined. Our goal will be to install 1000 HE washing machines in PY 2009.

4. Pilot or Study Rationale and Expected Outcome

High Efficiency Washers not only save Energy, in the form of Therms and KWh, but also save water. This aligns perfectly with the Commission's request to identify projects that we look not only at energy savings but also water savings.

PG&E will utilize Energy Specialists to qualify potential customers for this pilot. The Energy Specialists will be able to qualify the customers at the time of their LIEE energy education and assessment.

Due to the extreme savings in both energy and water, our low income customers should notice a decrease in their utility bills as well as their water bill.

5. Pilot or Study Implementation

Currently PG&E has three appliance contractors that deliver and install energy efficient refrigerators to our LIEE customers. Additionally our implementation contractors install the room air conditioners and evaporative coolers. For this project, we have yet to determine whether we will deliver these clothes washers through a separate contract or through the prime contractor.

Energy Savings Source: www.energystar.gov

Attachment A.10-08

Low Income Energy Efficiency Smart AC Project Implementation Plan

1. Pilot or Study Budget Table

Units	Cost	PY 2009 Total
p/yr 2009available 5,500	-	-
p/yr 2010 available 7,000	-	-
p/yr 2011 available7,000	-	-

2. Projected Pilot Impacts Table

<u>Energy Savings</u>: Proposal to leverage with the Smart AC program as an effort to integrate Demand Response into the LIEE Program. Energy savings will be accounted for under the Smart AC Demand Response program.

3. Brief Pilot or Study Description

Currently within the framework of the LIEE Program is an Energy Education which takes place with every customer who is enrolled into the LIEE Program. It is being proposed that during the Education, the Energy Specialist in addition to informing the customer of the LIEE program would take the opportunity to educate the customer in regards to the Smart AC Program. It is being proposed that if the customer has an operating central air conditioning unit, and is willing to be a customer in the Smart AC program that the Energy Specialist would complete the enrollment form, and sign the customer up for the Smart AC Thermostat or Switch. To compensate the Energy Specialist for enrolling a customer into the Smart AC Program, a capitation fee may be distributed to the Energy Specialist for every successful enrollment. The capitation fee will be paid out of the Demand Response and Smart AC budget.

The Smart AC program will supply PG&E LIEE Program Management with all marketing materials related to Smart AC for distribution to the Energy Specialists.

Pacific Gas & Electric Company's LIEE Program is expected to serve 17,000 customers with an operating central air conditioning unit in Program year 2009; 23,375 in Program year 2010; and 23,375 in Program year 2011.

4. Pilot or Study Rationale and Expected Outcome

PG&E's Smart AC gives the customer the power to help their community conserve energy when demand for electricity approaches capacity. The Customer can choose

between two Smart AC technologies, both of which allow PG&E to temporarily reduce the amount of electricity their air conditioner uses, reducing the overall demand for energy in the territory. PG&E will give the customer a \$25 cash reward for every Smart AC device installed.

During summer months, when demand for electricity on California's power system is the greatest, PG&E may send a signal to activate Smart AC. The Smart AC device is activated only during local emergency situations or when the California ISO calls emergency or near-emergency conditions (Stage I, II or III). The system will be activated for no more than 6 hours at a time and for no more than 100 hours per year.

The Customers comfort should not be compromised by Smart AC, as they can go online or call PG&E anytime before or during activation and opt out for the day.

5. Pilot or Study Implementation

The customer can choose between two of the following Smart AC technologies, both of which includes PG&E's customer service.

Smart AC Switch:

The Smart AC Switch is installed on or near the outside of the customer's air conditioning unit, so it is out of sight and out of mind. When the Smart AC Switch is activated via a radio signal from PG&E, the air conditioner will cycle at half as it normally would — approximately 15 minutes out of each half hour. The system fan will continue to cycle, moving air throughout their home.

The Smart AC Switch is installed by a certified technician and due to the exterior installation location, does not typically require an appointment.

Smart AC Thermostat:

The fully programmable Smart AC Thermostat replaces the customers existing thermostat and makes conserving energy easy with program schedules for both heating and air conditioning. The customer can also program it over the internet. When the Smart AC Thermostat is activated via a radio signal from PG&E, the temperature on the thermostat will be gradually adjusted upward no more than 4 degrees and for no more than 6 hours.

Attachment A.10-09

SmartMeterTM Program - LIEE Education Project

PG&E's LIEE is planning to implement a pilot project to explore ways to utilize SmartMeterTM technology to benefit its low income customers. PG&E's SmartMeterTM will not be fully implemented until 2011, so project plans are preliminary at this time. An SmartMeterTM -LIEE pilot project will not be initiated until 2011.

1. Pilot Budget Table

Energy Management Education	\$40,000
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2. Projected Pilot Impacts Table

No savings data has been captured at this time due to the AMI Initiative not being fully implemented.

3. Brief Pilot Description

The LIEE program will educate customers on how to utilize their new technology to help them understand and better manage their energy usage.

4. Pilot Rationale and Expected Outcome

SmartMeterTM will allow customers to take advantage of prices that vary by time of day – potentially realizing cost savings by shifting use from peak to off-peak. Doing so can reduce the cost of energy procurement and perhaps even help lessen California's growing need for more electric power and power infrastructure.

SmartMeterTM also will reduce the utility's energy purchasing costs by providing financial incentives for customers who voluntarily agree to rates that vary by time of day. This will encourage customers to shift electric use to off-peak periods, when power is cheaper.

5. Pilot Implementation

The LIEE Energy Specialists will be trained on how the SmartMeterTMwork. During their Energy Education they will teach the customer how to use SmartMeterTM so that they can see their energy usage. They will also distribute material that will explain how the SmartMeterTMwork and how they can use the technology to help lower their energy usage.

Attachment A.10-10 Impact Evaluation of the 2010 Low Income Energy Efficiency (LIEE) Program

Joint Utility Study

PG&E, SCE, SDG&E, and SoCalGas (the Joint Utilities) will continue the required two-year program impact review with the Impact Evaluation of the 2010 LIEE Program. The primary objective of the study will be to estimate the first year electric and gas savings by utility, by housing type, and by measure group. Other related program issues will likely be addressed as they arise during the program year. This study will occur in 2011-2012, beginning a year after the completion of the 2010 program year to allow for a full year of post-installation billing data.

1. Study Budget Table

Statewide Studies	Total Cost	PG&E Cost
Impact Evaluation of the 2010 LIEE Program	\$600,000	\$180,000

PG&E's portion of the Joint Utility Study is 30%.

While no proposal has been requested or received, the main cost drivers follow:

- Review of program delivery
- Review of prior impact studies and methodologies
- Surveys (onsite, telephone, in person)
- Analysis (billing, statistical)
- Reporting

2. Projected Pilot Impacts Table

Not Applicable for Studies

3. Study Description

- The Joint Utilities propose to conduct an impact evaluation of the 2010 LIEE program. An impact evaluation would be expected for 2010 if the previous two-year cycle for requiring impact evaluations continues to be followed, with the next mandated study being the 2008 LIEE programs evaluation.
- The LIEE Impact Evaluation of the 2010 LIEE Program will determine energy and demand savings associated with Program Year (PY) 2010.

 An accurate determination of measure savings is critical for guiding program delivery and determining cost effectiveness. Impact, process and related studies facilitate the achievement of the Programmatic Initiative by determining measure savings and improving programs that generate savings. Other related program issues will likely be addressed as they arise during the program year.

4. Study Rationale and Expected Outcome

- The study will provide a set of energy savings estimates that will be used for reporting purposes. In addition, it will provide informative information on participant energy consumption and characteristics. The study will also provide a comparison with results from previous years.
- Decision 03-10-041 specified that LIEE impact evaluations should occur every two years. Since the Joint Utilities are planning for a 2008 impact evaluation, the next mandated study would be an evaluation of the 2010 program. The impact evaluation will be the primary determinate of program savings, i.e., it will determine LIEE's contribution to providing energy resource benefits to California.
- Although not specifically a goal of impact studies, the reporting of impact results can highlight the role of increased penetration on savings as opposed to the role of deeper household savings.

5. Study Implementation

- Development of a detailed research plan to be submitted for approval to the joint utilities,
- Development of a sampling plan and weights,
- Data collection and verification,
- Development of a regression model for estimating energy savings,
- Analysis and evaluation of regression results, and
- Presentation of conclusions and recommendations.
- In addition, the study may include customer surveys or other data collection and analysis as approved by the Joint Utilities.
- The study will commence in 2011 and may not be completed until 2012, which will be covered under a subsequent application. We anticipate budgeting up to 70% of the costs in 2011 and the remainder in 2012.

Attachment A.10-11 Process Evaluation of the 2009 LIEE Program

Joint Utility Study

PG&E, SCE, SDG&E, and SoCalGas (the Joint Utilities) propose to conduct a Process Evaluation of the 2009 LIEE Program to assess the effectiveness of the program and to develop recommendations to program design or delivery that will improve the effectiveness of the program. The primary deliverable is a final report that will present the findings and the recommendations for possible program changes; however, the joint utilities are also seeking usable information and recommendations as the evaluation progresses, so that program managers can get timely feedback.

In addition to assessing the effectiveness of various components of the LIEE program such as outreach, contractor delivery, data tracking, etc., this study will also look at customer behavior and attitudes towards energy saving opportunities. The study will assess customer willingness to participate in energy saving programs, the particular needs of high usage customers, and low income customers response to energy education and communication efforts.

A key component of this process evaluation will explore attitudinal and behavioral aspects of its LIEE and CARE population.

1. Study Budget Table

Statewide Studies	Total Cost	PG&E Cost
Process Evaluation of the 2009 LIEE Program	\$250,000	\$75,000

PG&E's portion of the Joint Utility Study is 30%.

2. Projected Pilot Impacts Table

Not Applicable for Studies

3. Brief Study Description.

Specific objectives of the evaluation include:

- Document program goals, implementation strategies and procedures across utilities.
- Provide real-time feedback to program managers with specific focus on improving program recruitment, delivery and identifying implementation and program design problems for review and modification to ensure program dollars are fully utilized and reach intended participants to achieve the greatest benefit.

- Assess the effectiveness of the program.
- Evaluate areas of customer and trade ally satisfaction/dissatisfaction.
- Identify barriers and obstacles to meeting program goals.
- Characterize attitudes and energy-saving behaviors of targeted customers and assess their willingness to participate in energy saving programs.
- Provide recommendations for improving programs.
- Determine the effectiveness and efficiency of the new program design and operations.
- Assess customer willingness to participate in energy saving programs and how our low income customers respond to Marketing Education & Outreach (ME&O) efforts.
- As a review of program activities during the first year of the 2009-2011 Programmatic Initiative, the process evaluation will play a very important role in evaluating Joint Utility program processes and how they align with the Initiative. The Process Evaluation will also include an education, marketing and outreach component. The Joint Utilities believe that these elements will guide program ME&O by better positioning the Joint Utilities to undertake comprehensive and consistent ME&O efforts through direct and indirect customer contact.

4. Study Rationale and Expected Outcome

- A process evaluation is recommended by the Joint Utilities because one has not been done for several years, and with the changes in the program, it would be prudent to conduct an evaluation of the effectiveness and efficiency of the program design and operations.¹
- Furthermore, an assessment of the effectiveness of the program strategy will provide an opportunity to refine and improve delivery and implementation in order to meet the goals of the strategic plan and other initiatives. In addition, understanding customer attitudes toward program messages and energy saving opportunities will inform marketing and outreach plans which will help achieve penetration goals.
- The ME&O components of the Process Evaluation, when integrated into the program, may result in successful low cost and no cost measures with positive energy efficiency potential, increased customer awareness and favorable customer energy outcomes – all which facilitate increased market penetration. The traditional process evaluation will certainly focus on how the goals of the Programmatic Initiative are being met and how the LIEE strategies are supporting those goals in practice.

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¹ The CPUC-adopted *California Energy Efficiency Evaluation Protocols* document states, "It is anticipated that most programs will have at least one in-depth comprehensive process evaluation within each program funding cycle (e.g., 2006-2008), but a program may have more or less studies depending on

5. Study Implementation

• The primary method of data collection for the study will be customer surveys and focus groups along with in-depth interviews with contractors and other trade allies. The specifics of the study will be documented in a research plan to be submitted for approval to the joint utilities by the selected evaluation contractor. Qualitative research will be required to meet the objectives of the process evaluation. Research techniques may include phone and in-depth interviews with program participants, non participants, utility administrators and regulatory stakeholders. The utilities will conduct an RFP for a contractor to conduct the Study Assessment with clearly stated objectives, goals and methodology.

Attachment A.10-12 Low Income Non-Energy Benefits Study

Joint Utility Study

PG&E, SCE, SDG&E, and SoCalGas (the Joint Utilities) propose a Non-Energy Benefits (NEBs) Study to update the current methodology used by the joint utilities to quantify and assign appropriate non-energy benefits to program measures for the purpose of assessing both program and measure cost-effectiveness. The current methodology was established in 2001 and many of the values used to calculate NEBs are outdated and inappropriate for the current program.

1. Study Budget Table

Statewide Studies	Total Cost	PG&E Cost
Non-Energy Benefits Study	\$300,000	\$90,000

PG&E's portion of the Joint Utility Study is 30%.

2. Projected Pilot Impacts Table

Not Applicable for Studies

3. Brief Study Description

The Joint Utilities propose a Joint Utility Non-Energy Benefits study to quantify the elements of a cost effectiveness analysis, which is a key determinant of program design. Utility personnel and other stakeholders have raised questions about the methods used to develop the current values assigned to non-energy benefits of the programs, which come from a study that is now several years old.

The study will address the following research objectives:

- Provide background on the use of NEBs in cost-effectiveness tests for low-income energy efficiency programs.
- Discuss the effectiveness and appropriate use of the following options in developing NEB values for cost-effectiveness tests: a) review and update values and algorithms in the current model, b) develop a set of factors which would be used to project the energy benefits of LIEE programs to account for the NEBs.
- Provide a methodology for assigning NEBs at the measure level for cost-effectiveness testing.

4. Study Rationale and Expected Outcome

The current methodology for evaluating the cost-effectiveness of LIEE measures was last established in 2001 and many of the values used to calculate NEBs are outdated and inappropriate for the current program. This study will address that problem and provide an updated methodology for assigning NEBs to LIEE measures. Having a more accurate understanding of the cost-effectiveness of program measures will enable program planning and design.

- A successful NEB study is directly related to the achievement of the Programmatic Initiative by defining and quantifying the non energy contributors to cost effectiveness. As is clear from the Initiative, nonenergy benefits as well as resource benefits are key indicators of program success.
- Cost effectiveness is clearly a key determinant of program design, and the Commission recognizes the role of non-energy benefits in the cost effectiveness calculation. Utility personnel and other stakeholders have raised questions about the methods used to develop the current values assigned to non-energy benefits of the programs, which come from a study that is now several years old.
- Having accurate cost effectiveness metrics (i.e., including updated NEBs)
 can only increase the pool of measures and households eligible for LIEE
 treatment.

5. Study Implementation

The study will include several components including the following:

- A comprehensive literature review of the use of NEBs in the energy efficiency industry in general and in low-income programs specifically.
- An assessment of the various options for assigning NEBs to program
 measures including a full review and update of the current NEBs model
 and development of a set of efficient factors to be applied to energy
 savings to estimate the relevant NEBs.
- Development of a methodology to be used by the joint utilities to assign NEBs to LIEE program measures for the purpose of cost-effectiveness testing.
- Public workshops will likely be a part of the process to allow interested parties to contribute to and understand the issues surrounding this important research.

Attachment A.10-13 Refrigerator Degradation EUL Study

Joint Electric Utility Study

PG&E, SCE, and SDG&E (the Joint Electric Utilities) propose a study of refrigerator retention and efficiency degradation in 2009. The study will combine phone interviews, secondary research, statistical modeling and on-sites when necessary to determine optimal refrigerator replacement criteria.

1. Pilot or Study Budget Table

Statewide Studies	Total Cost	PG&E Cost
Refrigerator Degradation EUL Study	\$200,000	\$66,660

PG&E's portion of the Joint Electric Utilities study is 33.33 percent.

2. Projected Pilot Impacts Table

Not Applicable for Studies

3. Brief Study Description

Currently, program rules for LIEE require that contractors limit replacements to pre-1993 appliances. 1993 was chosen as an appropriate cut-off because energy efficiency standards that went into effect in 1993 made post -1993 refrigerators much more energy efficient than refrigerators that were manufactured pre-1993. However, in 2008, a refrigerator manufactured in 1993 is already 16 years old. According to DEER, refrigerators have a 15-20 year effective useful life (EUL). The Joint Utilities need to determine the appropriate age at which to replace older, less efficient refrigerators with more energy efficient units through the LIEE program to achieve maximum energy savings.

In 2009, roughly 9-12 percent of low income households in the SCE territory (122,000 to 163,000 households) will be "pre-1993" based on Needs Assessment (HENS) and Residential Appliance Satuturation Study (RASS)-based analysis conducted for SCE in January 2008.

Given the primary role of refrigeration savings in the LIEE portfolio, as evidenced in the PY 2005 Impact Study, the Joint Electric Utilities propose to conduct a study of refrigerator retention and efficiency degradation in 2009 to examine appropriate replacement criteria. This study will examine the potential foregone energy savings by maintaining a pre-1993 (energy efficiency standards vintage) rule for appliance replacement.

Research in this area is contemplated exclusively within the residential low income sector and will be planned and executed so that it dovetails with (and is strengthened by) the cumulative data collection and analysis that has already been carried out by SCE and others in evaluating California IOU appliance recycling programs.

4. Study Rationale and Expected Outcome

Strategy 5 of the LI Section of the California Energy Efficiency Strategic Plan (CEESP) focuses on long-term and enduring energy savings. Given the primacy of refrigerator-derived savings in the LIEE electric portfolio, this Strategy is enhanced by refining LIEE refrigerator replacement criteria. Detailed lifecycle savings associated with refrigeration can assist the program in meeting the energy resource needs of California through the LIEE program.

A successful refrigerator study is directly related to the achievement of the Programmatic Initiative by defining and quantifying the refrigerator energy savings that are currently *not* being achieved in the program under the "pre-1993" refrigerator replacement criteria. Defining and implementing optimal replacement criteria will increase electric savings potential of refrigerators in the LIEE program while supporting the cost-effectiveness of the program.

5. Study Implementation

The study will include several components including the following:

- Literature review of current and historical appliance recycling studies and refrigeration savings potential and degradation¹
- Assessment of refrigerator energy efficiency standards
- Statistical analysis of utility program and residential records
- Statistical analysis of secondary data including DOE lab consumption data
- Statistical modeling of appliance unit electric consumption (UECs)

¹ Including Athens Research working paper on "Refrigerator UEC Vintage, Age, and Other Effects: Implications for the "Pre-1993" Standards Vintage vs. a Return to an Age-based Cutoff for Refrigerator Replacement in LIEE."

Attachment A.10-14 Household Segmentation Study

PG&E and SCE Study

PG&E and SCE propose a LIEE Segmentation Study to facilitate identification of eligible customers willing to participate in our LIEE programs. A successful customer segmentation scheme will support specific messages, products and services that are more likely to lead to energy saving behaviors.

This study will directly deliver on the first strategic goal of the Low Income section of the CEESP to develop customer segmentation and will support the Commission's goal of achieving 25% customer participation by year-end 2011.

1. Study Budget Table

Statewide Studies	Total Cost	PG&E Cost	
LIEE Household Segmentation Study	\$200,000	\$120,000	

2. Projected Pilot Impacts Table

Not Applicable for Studies

3. Brief Study Description

PG&E and SCE propose an LIEE Segmentation Study to facilitate identification of eligible customers willing to participate in our LIEE programs. Detailed segmentation analysis will help us to tailor messages, products and services to customers most likely to respond to them.

While various demographic data is available from third party sources that characterize the low income population, similar data that describes what messaging drives energy efficiency awareness and behavior for these customers is much more elusive.

Given the ambitious goals laid out in the Programmatic Initiative, a "one size fits all" strategy is much less likely to provide either energy resources or improve quality of life measures than is a customized initiative based on customer characteristics and preferences identified by a well-designed study.

4. Study Rationale and Expected Outcome

PG&E and SCE propose an LIEE Segmentation Study to facilitate identification of eligible and willing customers for their LIEE programs. With limited budgets, the utilities have not needed to market their LIEE programs to meet annual goals.. Given the new Commission goal to obtain 25% customer participation by 2011, this study will allow LIEE program managers to target and design tailored outreach strategies for customers most likely to respond to program energy saving efforts.

This Segmentation Study directly links to Strategy 1 of the Low Income Section of the California Energy Efficiency Strategic Plan to develop customer segmentation to improve program delivery and increase opportunities for program participation and energy savings. For example, as market transformation occurs in the CFL arena, and as refrigerator replacement criteria impact future savings potential, the results of this LIEE Household Targeting Study will be used to help the utilities identify and target eligible and willing customers for our LIEE programs. Through enhanced understanding of their needs and desires we will be able to design more appropriate outreach and marketing, thereby increasing program cost effectiveness. Usage-based segmentation will help define the size of the market eligible for relatively more expensive measures such as cooling measures. Population segments that will be studied include (but are not limited to):

- Rural/Urban
- Renter/Owner
- Ethnicity/Language
- Age
- Disability
- Family size
- Climate zone
- Housing type.

PG&E and SCE believe that tailoring program delivery to the most appropriate customer sectors and segments is fundamental to increasing the penetration of the LIEE program. There is no reason to believe that the LIEE target population is any less sensitive to message, product and service variation than are consumers in general

5. Study Implementation

The study will include several components:

- Literature review of utility and other relevant low income segmentation methodologies, including results of the KEMA Needs Assessment
- Assessment of successful contemporary utility segmentation strategies

- Quantitative and qualitative research to define and describe segmentation schemes
- Application of the segmentation methodology to utility program data
- Segmentation validation and testing

This study will use various data sources such as demographics, participation records, credit history, weather sensitivity, dwelling structure attributes and utility records, to examine which meaningful subgroups in the low income population are related to:

- Burden
- Vulnerability
- Potential
- Willingness
- Cost effective service focus

These factors, and how they interact and predict one another, will also be explored. In addition to standard segmentation outcomes such as discrete customer clusters, we will examine the consequences for utility and customer interaction to enhance our ability to target and enroll all willing and eligible LIEE customers.

Attachment B – 5

CARE Recertification and Post-Enrollment Verification Non-Response Study

PG&E is committed to achieving the Commission's goal of enrolling all CARE-eligible customers who wish to participate in the program. In order to help qualified customers remain on the CARE program, PG&E proposes a study to understand 1) which customers do not respond to multiple recertification and post-enrollment income verification requests, 2) why they do not recertify or provide requested income documentation, and 3) how PG&E can overcome these barriers to their continued participation. PG&E will conduct surveys of CARE customers who failed to recertify or respond to requests for income documentation.

1. Projected Program/Pilot/Study Budget Table

Study	Cost	Year
CARE Recertification/Post-enrollment	\$75,000	2010
Verification Non-Response Study		

2. Brief Pilot or Study Description

Proposal	Description	Benefits	Current Practice
In order to help qualified	PG&E will conduct survey	PG&E will learn more	PG&E customers self certify.
customers remain on the	research of CARE customers	about the reasons	PG&E post-verifies a
CARE program, PG&E	not responding to	customers do not recertify	percentage of CARE
proposes a study to	Recertification and Post	or post-verify and find	customers, requiring them to
understand 1) which	Enrollment Verification	ways to address those	submit income
customers do not respond to	requests. PG&E will utilize	reasons, helping to	documentation. PG&E
multiple recertification	experienced in-language survey	maintain current CARE	requires all CARE customers
requests, 2) why they do not	researchers as well as	enrollment rates.	to recertify periodically.
recertify or provide	community agencies having		Customers who do not
requested income	local knowledge of their		respond to requests to
documentation, and 3) how	communities and the trust of		recertify or post-verify
PG&E can overcome these	their clients.		income are dropped from the
barriers to their continued			program.
participation.			

3. Pilot or Study Rationale and Expected Outcomes

In order to help qualified customers remain on the CARE program, PG&E proposes a study to understand which customers do not respond to multiple

recertification requests, why they do not recertify, and how PG&E can overcome these barriers to their continued participation.

PG&E CARE customers self-certify for the CARE program and are enrolled in CARE for a fixed period of two to four years. At the end of their enrollment period, customers are requested to recertify their eligibility to remain on CARE for another multi-year term. Over the last several years, PG&E has continued to explore and decrease barriers to recertification and post-enrollment verification. PG&E has increased automatic enrollment with other utility programs and categorical eligibility opportunities with other public assistance agencies. PG&E has increased in-language enrollment opportunities, simplified applications and streamlined application procedures. In its last CARE program application, PG&E extended the certification period for fixed-income customers from two years to four years.

Nevertheless, CARE recertification and post-enrollment verification non-response rates remain high. As many as 25 percent of PG&E's CARE customers do not respond to recertification requests, and are subsequently dropped from the program. PG&E currently conducts random post-enrollment income verification on approximately 11 percent of incoming CARE applications. On average, 70 percent of these customers fail to respond to the income verification requests and are subsequently dropped from the program.

PG&E believes reasons for non-response are many, and could include:

- Customers who no longer qualify for CARE and do not respond,
- Customers who do not read or speak English and do not understand the recertification or verification requests,
- Customers who procrastinate or misplace the CARE recertification request, and
- Customers who mistrust requests for income or other personal information.

4. Pilot or Study Implementation

To better help us achieve our goal of enrolling qualified customers, PG&E proposes conducting a survey research study to explore who these customers are and why they fail to respond to requests to recertify CARE participation or verify their income.

PG&E will conduct follow up in-language phone surveys or in-person interviews with customers that did not respond to CARE income verification requests and were subsequently dropped from the program. PG&E will work with a combination of experienced, in-language researchers and community agencies (including PG&E CARE Outreach Contractors) that have local knowledge of their community as well as the trust of their clients to survey and/or interview these

hard-to-reach PG&E CARE customers, elicit actionable responses, and help interpret them and recommend solutions.

PG&E will attempt to determine how many of these customers failed to respond to requests because they did not qualify, and how many were dropped for other reasons, including inability to read or speak English, inability to understand the income verification request, distrust of PG&E's reasons for needing income documentation, unwillingness or inability to provide documentation, and procrastination.

PG&E expects this study to cost \$75,000. The cost of this study includes higher costs for in-language surveys, and the difficulty of successfully reaching this especially hard-to-reach customer segment. An experienced survey research firm will design and implement a research sample plan appropriately segmented for PG&E's CARE population. PG&E will enlist the support and advice of community agencies with local in-language knowledge and experience working with CARE-eligible local populations that are often very hard to reach. PG&E will conduct this study in 2010 so that it can test and implement recommendations in 2010 and 2011.

PACIFIC GAS AND ELECTRIC COMPANY APPENDIX E

PG&E PY2009-2011 Low Income Programs Application - Public Input Workshop

Pacific Gas and Electric Company held a public workshop on March 13, 2008 in San Ramon to gather input and discuss its upcoming 2009-2011 Low Income Programs Application for the Low Income Energy Efficiency (LIEE or "Energy Partners") Program and CARE. A workshop notice was sent to all parties in the service list of Rulemaking 07-01-042, as well as interested contractor and agency contacts.

LIEE PROGRAM	Meeting Location:	
1:00 pm – 3:00 pm	San Ramon Valley Conference Center	
	3301 Crow Canyon Road	
	San Ramon, CA 94583	
CARE PROGRAM		
	Ph (925) 866-7612 / Fx (925) 866-7687	
3:00 pm – 4:00 pm	http://www.sanramonvalleyconferencecenter.com/transportation.htm	
•		
Teleconference Information: A number is being provided for individuals who wish to		

Workshop Participants

call into the meeting. The call-in number is: 1-866-325-0587 ID: *415 973 2317*

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Robert Lehman	CPUC-DRA	415-703-2245	leh@cpuc.ca.gov	
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PG&E presented a brief overview of the LIEE and CARE programs. A copy of the workshop presentation is attached. Following the brief presentation, PG&E invited thoughts and discussion from the workshop participants. Following is a summary of the questions and discussion.

March 13, 2008 San Ramon Workshop Summary

Q: The presentation flow chart shows that some customers receiving less expensive measures will not be required to show income documentation. Will a Property Owner Waiver still be required for these Fast Track customers?

A: A POW will still be required if there is any installation on the property, even for Fast Track customers.

Q: What kind of qualifications will Fast Track customers need?

A: A Fast Track customer must be on CARE.

Q: Is a customer going to get all the listed Measures no matter what?

A: All Measures must be feasible for installation, just as they are now.

Q: What make a customer qualify for the electric tier levels that he/she is being listed in? **A:** A customer is assigned a Usage Level (High, Medium, or Low for electric use based on the highest electric tier they reached at least 2 times over the last 12 months usage.

For example, an electric customer that reached Tier 4 once, Tier 3 twice, Tier 2 six times and Tier 1 three times over the previous 12 months would be treated as a Tier 3 customer (because Tier 3 was the highest tier they reached at least twice during that period) and assigned to the Medium Usage Level.

Q: Why over the last 12 months?

A: To give a usage history over both the heating and cooling seasons. We are also looking at requiring that a customer have a 6-month minimum usage history to be treated in LIEE. This gives us at least some portion of both heating/cooling seasonal data. If they don't have 6 months, we could wait-list them and come back to them after they've been a customer for 6 months.

Q: What if the Tier 1 & 2 customer is not on CARE or any other LI programs, what do you require?

A: The customer has to sign up with CARE. They can sign up with the LIEE contractor.

Q: Why not Tiering on Gas Customers?

A: We are still looking at gas usage data, but are planning a Tiered approach based on Gas usage as well.

Q: How will you handle customers that are only PG&E Gas? Will you give only Gas Measures?

A: We're still working on our LIEE gas plans.

Q: How will you bundle the measures for different Tiers?

A: We're still working out specifics. Basic approach will offer most cost effective measures (highest energy savings for least cost) to all qualifying customers: energy education, lighting, refrigeration. Less cost effective measures offered to customers where they offer most potential for saving energy (high users, specific climate zones or housing types).

Q: Re. past 12 month approach. Two households with similar usage may have a different energy usage patterns.

A: This is true. We're still exploring options to come up with the most fair criteria. We want to be fair to all customers, but still provide the most cost effective program we can so that we can serve as many customers as possible. Household energy usage is one criteria that can be used to determine what energy efficiency measures/services to provide. Higher users have the most potential for lowering energy use.

Q: What is the breakdown in percentage of customers on the Tiers?

A: Percentage of low income customers on electric tiers: 44% ==Tiers 1&2; 29% == Tier 3; 27% == Tiers 4&5.

Q: What will PG&E do about the Window AC measure? A lot of the ones installed in 2007 were Tier 1&2 customers.

A: The LIEE ideas presented today are early draft plans. We're still evaluating tiering and other potential feasibility criteria, including climate zones.

Q: For the Gas side, you have Duct Test & Seal as a measure. What about on the Electric side, when you are doing the AC work? Will you do the DTS as well?

A: Unknown. We are still looking at measure cost effectiveness, and have not included or excluded DTS yet.

Q: So do we still do the duct test and then duct seal?

A: Probably, but we are still exploring specific measure criteria and installation practices for the 2009-2011 LIEE program.

Q: What is the requirement of the Duct Seal, should we do full/partial seal?

A: We are still exploring specific measure criteria and installation practices in order to offer the most cost effective program.

Q: Can Energy Specialists who are qualified to do AC Tune Ups do the AC Tune Up when doing the education visit?

A: We are still exploring specific measure installation practices.

Q: What about measures that are currently installed only in specific climate zones, like AC Tune Up?

A: We are still exploring specific measure criteria, but weather-sensitive measures will continue to be offered in climate zones where they are most cost effective. We may propose that some measures be offered in more climate zones.

Q: What about the "Whole House Approach;" will full weatherization will be performed on all households at all?

A: We are looking at ways to design the program to offer the most feasible and cost effective measures to qualifying customers.

Q: Do you have a breakdown by Tiers re customers who have Central AC or not?

A: We have LIEE participant data re central AC (and other measures) that we use to derive percents re LI customers. We also have data from RASS and the KEMA Needs Assessment showing how many customers have/need measures. We are looking at what other census/market data may be available to segment customer need.

Q: Any Measures that you planned on opening up the climate zone on? Right now what about Ceiling Fan?

A: We're still assessing climate zone data.

Q: Any consideration on measure pay scale changes?

A: We are continuing to assess the entire program to continue to pay fairly for installation and maintain a cost effective program.

Q: Any Pilot on Solar Measures?

A: We will be working with the California Solar Initiative's low income programs. At this time we are not contemplating any specific LIEE solar pilots.

Q: Since you have put Clothes Washers on the list of potential new measures, why not Clothes Dryers?

A: Clothes dryers do not appear to be cost effective for this program at this time.

Q: Any information in regard to Refrigerator Replacement year requirements (any changes)?

A: We are looking at what is the best time to replace refrigerators in terms of their energy efficiency and savings potential. We will probably request permission to conduct a study to determine this information for the LIEE program.

Q: Any plan on how you will target customers for the first budget cycle.?

A: We are still exploring options and processes to come up with optimal plans for our Application.

Q: Outreach --- how are you going to pull the program together?

A: We are still exploring options and processes to come up with optimal plans for our Application.

Q: What about different income levels based on area medians, for some cities in the Bay Area for example?

A: Yes, county median income levels in CA vary. We are not suggesting that the income criteria adopted by the Commission be changed, but will comply if they are. If changes are suggested, we hope all parties will consider how they will affect the Non-CARE customers who are paying for them, particularly the near-low income customers who barely miss the qualifying cut-off who will be hit the hardest with the increased burden on their energy bills.

Q: Do you have any segmenting information and what is your approach?

A: We have LIEE participant data re measures that we installed through the program, as well as information we collect at their home re their heating/cooling and fuel sources. We use this data to derive percents that we apply to LI customer households when we are planning for measure installation rates and budgets. We also have data from RASS and the KEMA Needs Assessment showing how many customers have/need measures. We are looking at what other census/market data may be available to segment customer need by county/census block/ZIP Code, housing type, climate zone, and other useful population variables such as senior/disabled/family size, ethnicity/language, renter/owner, etc.

Q: What is your Outreach strategy on Tier customers? A Tier 4-5 concentration approach will make it difficult for contractors to do their work towards the end of the program (2020) as all that will be left are Tier 1&2 customers.

A: We are still exploring various outreach strategies and segmentation approaches to most effectively reach all customers by 2020, as required. We may look at implementing targets or other restrictions to ensure all types of customers are being treated and none are being excluded.

Q: Will the LIEE Administration contract that is being bid be a 3 year contract or annual contract?

A: It will be a 3 year contract.

Q: Do you have any data on LI customers moving around? What about in multi-unit dwellings, or seniors moving into newer homes?

A: We have done no studies on LI customer movement. Over 50% of CARE customers moved last year.

Suggestions for New Measures to Consider in Addition to those already being considered by PG&E (Occupancy Sensors, High Efficiency Clothes Washers, Torchieres, Furnace Filters, Microwaves)

- Whole House Fans
- Attic Fans
- Wall/Floor Insulation
- Clothes Dryers
- Solar Water Heating
- Portable Electric Space Heaters (1500 watts)
- Lower flow showerheads $(2.5 \rightarrow 2.0)$
- Increased Attic Insulation (R19→ R30)



PG&E 2009-2011 Low Income Energy Efficiency Application

Public Workshop March 13, 2008 San Ramon, CA



Background

- D.06-12-038 (EE) and D. 07-12-051 (LIEE)
 - Directed the development of a Strategic Plan for EE and LIEE through 2020
 - Status update: www.californiaenergyefficiency.com
 - Upcoming Strategic Plan LIEE workshop on Program Delivery and ME&O – March 28, 2008
 - Established a 3-year program planning cycle for 2009-2011
 - Required LIEE & CARE Program Applications by May 15, 2008



LIEE Programmatic Initiative

- D.07-12-051 established the following programmatic initiative for LIEE:
 - "To provide all eligible customers the opportunity to participate in the LIEE programs and to offer those who wish to participate all cost-effective energy efficiency measures in their residences by 2020."



LIEE Policies & Guidance

- D.07-12-051 committed to changing the way we approach LIEE programs by adopting new policies and program guidance:
 - □ The complementary objectives of LIEE programs will be to provide an energy resource for California while concurrently providing low-income customers with ways to reduce their bills and improve their quality of life;
 - □ LIEE programs should emphasize opportunities to save energy;
 - □ LIEE programs should be designed to take advantage of all cost-effective energy efficiency opportunities;
 - □ LIEE programs should include measures that may not be cost-effective but that may promote the quality of life of participating customers;
 - □ 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;
 - □ LIEE programs should be integrated with other energy efficiency programs to allow the utilities and customers to take advantage of the resources and experience of energy efficiency programs, promote economies of scale and scope, and improve program effectiveness; and
 - LIEE programs should take advantage of other resources, such as federally funded programs, local efforts, the work of businesses and publicly-owned utilities.



Commission Staff Proposal for Program Delivery

	Density	/In	cidence
Energy Usage	LOW (very sparse/<10% LI)		HIGH (very dense/ >20% LI)
LOW	 - Partner w/ low-income agencies - Deliver cost-effective and low-cost measures at events - No screening or use CARE eligibility 		 Canvass or direct install measures to all households Deliver cost-effective, low-cost measures
MED	Two scenarios: 1)above baseline 2)high seasonal use – deliver weather dependent measures, call to inquire about interest		 Direct install measures to all households Deliver cost-effective and medium-cost measures Use CARE eligibility
HIGH	Comprehensive treatment of measuresUse current enrollment method		Comprehensive Treatment of measuresUse current enrollment method

In D. 07-12-051 the Commission stated its support of the staff proposed delivery method and that it would be discussed further in workshops to be held to implement the decision and would revise it in ways to make it most useful for effective program delivery. Utilities were directed to utilize the subsequently revised model considering a tiered approach targeting high users while offering programs to all eligible customers.



LIEE PY2009-11 Program Goals

- Achieve 25% of the Commission's programmatic initiative by 2012
 - □ PG&E currently has 1.8 million residential customers eligible for LIEE at 200% of the Federal Poverty Level
- Develop specific participation goals in specific population sectors or segments





LIEE 2009-2011 Elements

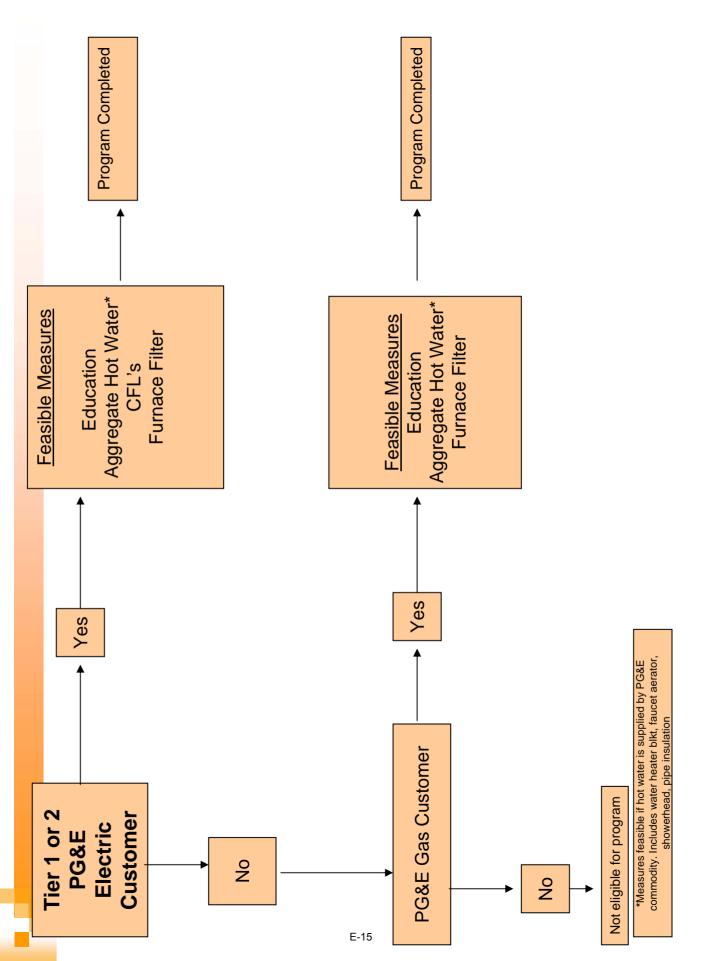
- Tiered approach
- Focus on Energy Efficiency
- Cost Effectiveness
- Equity dollars set aside
- Pilots
- Integration
- Flexibility

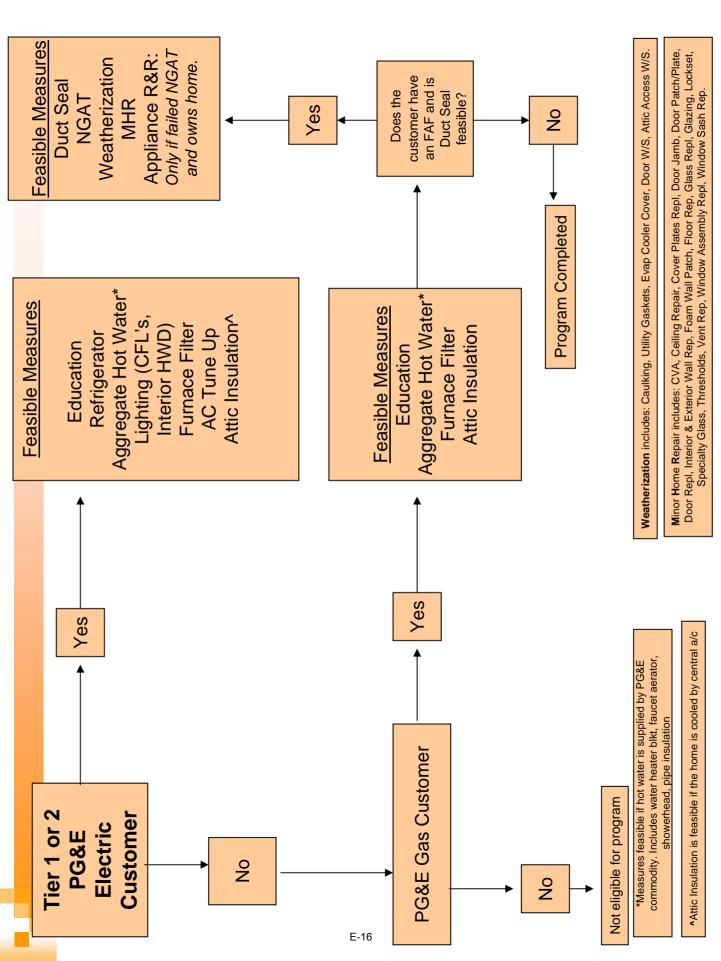


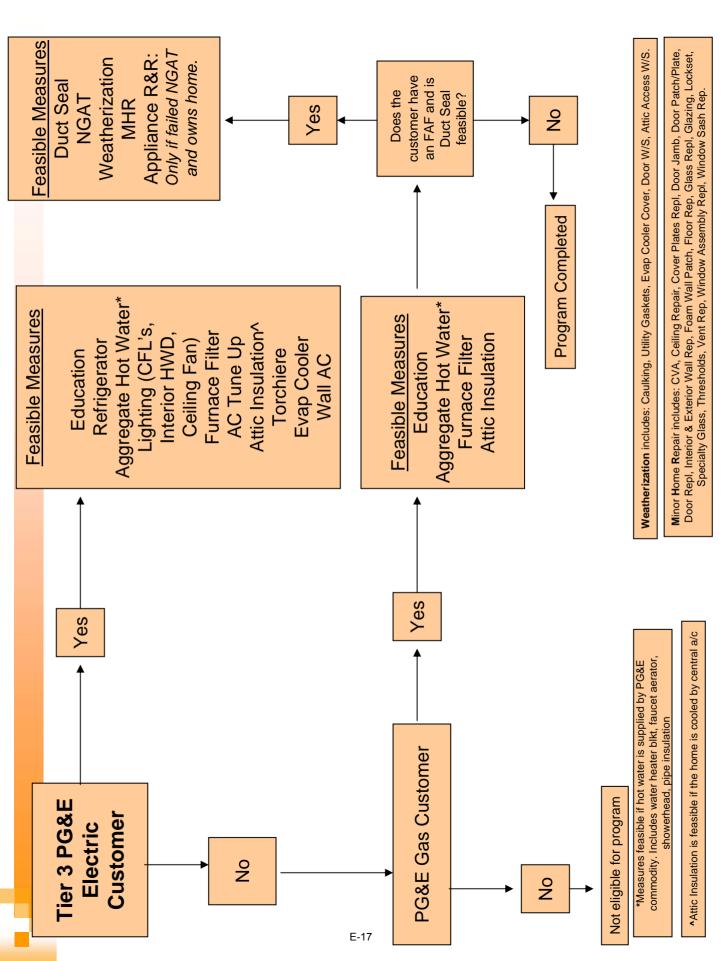


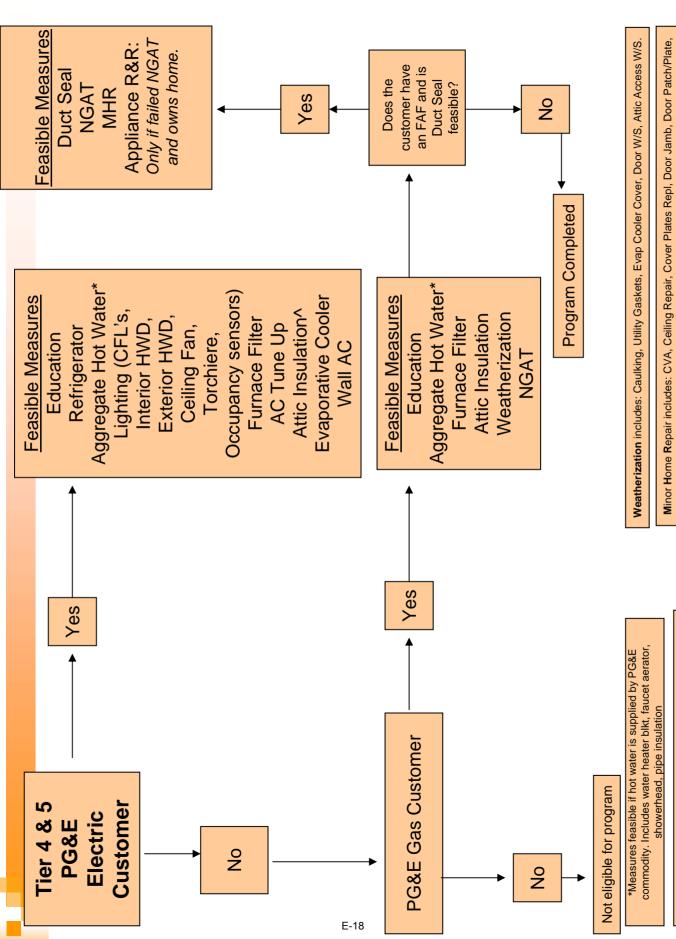
Program Delivery

- Tiered Approach based on energy use
- Segmenting based on climate zones, geographic areas, language
- Lessen documentation requirements
- Categorical Enrollment
- Bulk Purchasing









Door Repl, Interior & Exterior Wall Rep, Foam Wall Patch, Floor Rep, Glass Repl, Glazing, Lockset, Specialty Glass, Thresholds, Vent Rep, Window Assembly Repl, Window Sash Rep.

^Attic Insulation is feasible if the home is cooled by central a/c





Potential New Measures

- PG&E is assessing several new measures to include in the program on a limited pilot or regular basis.
 - □ Furnace Filters
 - Torchieres
 - Occupancy Sensors
 - Clothes Washers
 - Microwaves
 - Whole House Fans





Pilots

- Pilot Measures
 - Clothes Washers
 - Microwaves
 - Whole House Fans
- Leveraging community/municipal programs
 - Piloting "Community Blitz" approaches with selected communities
- Section 8 Public Housing
- AMI Pilot
- AC Cycling Demand Response Pilot





Integration

- Leverage with CARE
- Integrate LIEE and EE/ Local Government/ Third Party programs
- Leverage with other utilities (IOUs, munis, SMJUs, irrigation districts, water, etc.)
- Leverage with State and Federal low income programs
- Coordinate with CA Solar Initiative



Marketing, Education & Outreach

- Continue current successful M&O strategies
 - Canvassing
 - Targeted Direct Mail
 - Outbound Calls
- Continue to leverage with CARE
 - □ Target high energy-use CARE customers
- Expand M&O strategies
 - Advertising
 - Coordinate outreach with EE
 - Explore opportunities with other utilities and agencies (munis, water, local governments, LIHEAP)
 - Expand grassroots outreach efforts with CBOs and other agencies
- Segment customer messaging to promote increased awareness
 - □ Especially to lay the groundwork for 2012→ LIEE participation
- Provide more individualized energy assessments and educations
 - Targeting high usage customers to help them manage energy use and lower bills



Studies

- PG&E is proposing LIEE studies aimed at helping us learn what we need to know about our customers and strategies to get us to our 2020 goal of reaching all eligible customers that want to participate.
 - □ Program and Pilot impact and process evaluations
 - □ Evaluate new program delivery strategies
 - Market segmentation studies
 - Assess energy education strategy success in promoting behavior change and energy savings



Questions/ Comments/ Input?

- PG&E contacts:
 - □ Frances Thompson
 - FLT2@pge.com
 - Mary O'Drain
 - MJOb@pge.com

LIOB MEETING MARCH 19TH
CHARO – EAST LOS ANGELES



PG&E 2009-2011 CARE Application

Public Workshop March 13, 2008 San Ramon, CA





Background

- CPUC D.07-12-051
 - □ Required IOUs to file CARE and LIEE program applications for PY2009-2011 by May 15, 2008.



Continue Successful Outreach

- Current CARE outreach strategies
 - 82 Community Outreach Contractor (COC) partnerships
 - Multi-language toll-free line: 1-866-PGE-CARE
 - Multi-lingual collateral
 - Mini applications in customer bill and welcome packets
 - Direct mail
 - □ Local office partnerships
 - Ethnic media
 - □ Employee Involvement Month
 - Multi-cultural event participation
 - □ Website promotion
 - Leveraging with LIEE and other low-income programs
 - Public Assistance Agency partnerships



2009–2011 CARE Application

New Elements

- Propose same residential program requirements for Sub-Metered tenants
- Propose two-year certification for CARE Expanded Programs
- Propose survey of CARE customers not responding to Recertification and Post Enrollment Verification requests
- Propose a process for automatically qualifying tenants of public housing and Section 8 housing
- □ Propose budget increase



Questions/ Comments/ Input?

- PG&E contacts:
 - □ Linda Fontes
 - LCF2@pge.com
 - Mary O'Drain
 - MJOb@pge.com

LIOB MEETING MARCH 19TH
CHARO – EAST LOS ANGELES

2009-2011 Low Income Programs Application and CEESP PG&E Meetings and Public Workshops

12/12/07	PC&E Group Discussion Frage
	PG&E Group Discussion – Fresno
12/19/07	PG&E Group Discussion – Davis
12/20/07	PG&E Group Discussion – Berkeley
12/24/07	D.07-12-051
01/07-08/08	CPUC LI CEESP Public Workshop – San Ramon
01/23/08	LIOB – Oakland
02/20/08	Jt Util LI Quarterly Public Mtg – SF
02/21/08	CEESP Public Presentation – SD
02/22/08	CEESP Public Presentation – LA
02/22/08	PG&E Meeting with ED at CPUC
02/27/08	CEESP Public Presentation – SF
03/03/08	CPUC Cost Effectiveness Public Workshop – SF CPUC
03/13/08	PG&E Public 09-11 LIEE-CARE App Workshop – San Ramon
03/19/08	LIOB – East LA
03/28/08	CPUC Program Delivery and ME&O Public Workshop – SF CPUC
04/01/08	ACR providing guidance on 09-11 Apps & CE
04/03/08	Jt Util Public Mtg re LI CEESP – San Ramon
04/11/08	PG&E Mtg w/ ED at 123 Mission
04/21/08	PG&E Mtg w/ ED, City of SF and LIHEAP – CPUC
04/21/08	File LI Programs Monthly Report
05/01/08	File CARE, FERA and LIEE ARs
05/15/08	File LIEE-CARE 2009-2011 Application
06/02/08	File CEESP

PACIFIC GAS AND ELECTRIC COMPANY APPENDIX F STATEMENTS OF QUALIFICATIONS

PACIFIC GAS AND ELECTRIC COMPANY STATEMENT OF QUALIFICATIONS OF LINDA C. FONTES

3	Q 1	Please state your name and business address.
4	A 1	My name is Linda C. Fontes, and my business address is
5		123 Mission Street, San Francisco, California.
6	Q 2	Briefly describe your responsibilities at Pacific Gas and Electric Company
7		(PG&E or the Company).
8	A 2	I am the supervisor of the CARE, FERA and Cooling Centers Program. The
9		CARE program provides a 20 percent discount on your monthly energy bills
10		for qualifying households. The FERA program provides savings on your
11		electric bill for large households of three or more persons with low-to-middle
12		income. The Cooling Centers program is a network of community centers
13		and other public buildings where customers can go to cool off when the
14		temperature gets unusually and dangerously high. I have held this position
15		for approximately seven years.
16	Q 3	Please summarize your educational and professional background.
17	A 3	I have worked at PG&E since 1978 holding several positions in the
18		Economics and Forecasting, Information Technology and Customer Energy
19		Efficiency departments. My program experience includes supervision of
20		staff; administration of policies and procedures; management of budgets
21		and regulatory filings; development of outreach initiatives and partnerships
22		with external agencies, contractors and community-based organizations.
23	Q 4	What is the purpose of your testimony?
24	A 4	I am sponsoring the CARE program plans and budgets for program
25		years 2009, 2010 and 2011.
26	Q 5	Does this conclude your statement of qualifications?
27	A 5	Yes, it does.

SPACIFIC GAS AND ELECTRIC COMPANY STATEMENT OF QUALIFICATIONS OF DAN C. QUIGLEY

3	Q 1	Please state your name and business address.
4	A 1	My name is Dan C. Quigley, and my business address is Pacific Gas and
5		Electric Company, 77 Beale Street, San Francisco, California.
6	Q 2	Briefly describe your responsibilities at Pacific Gas and Electric Company
7		(PG&E or the Company).
8	A 2	I am the director, Charitable Contributions, within the Community
9		Partnership and Civic Initiatives Department, and I am responsible for the
10		company's charitable contributions, volunteer programs, and workplace
11		giving campaign.
12	Q 3	Please summarize your educational and professional background.
13	A 3	In 1970, I graduated from Stanford University, Palo Alto, with a Bachelor of
14		Arts degree in Economics. I worked with the Department of Energy in
15		Washington, DC, from 1973-1982 as an analyst and program manager for
16		energy efficiency programs. From 1982-1987, I worked at the International
17		Energy Agency in Paris, France, as an energy policy analyst and assistant
18		to the Executive Director. I joined PG&E in 1988 as an evaluation
19		consultant in the Energy Efficiency Department. In 1993, I joined the
20		Corporate Planning Department as an analyst. In 1995, I was promoted to
21		the position I currently hold, director, Charitable Contributions.
22	Q 4	What is the purpose of your testimony?
23	A 4	I am sponsoring the REACH Plus sections of the Low Income Assistance
24		Programs Program Year 2009-2011 Application regarding the Low Income
25		Energy Efficiency (LIEE) program and the California Alternative Rates for
26		Energy (CARE) program.
27	Q 5	Does this conclude your statement of qualifications?
28	A 5	Yes, it does.

PACIFIC GAS AND ELECTRIC COMPANY STATEMENT OF QUALIFICATIONS OF FRANCES L. THOMPSON

3	Q 1	Please state your name and business address.
4	A 1	My name is Frances L. Thompson, and my business address is
5		1320 El Capitan Drive, Danville, California.
6	Q 2	Briefly describe your responsibilities at Pacific Gas and Electric Company
7		(PG&E or the Company).
8	A 2	I am the program supervisor of the Energy Partners Program. The program
9		provides free weatherization, appliances, and energy education services
10		income qualified customers. I have held this position for approximately
11		six years.
12	Q 3	Please summarize your educational and professional background.
13	A 3	I have a Bachelor of Arts degree in Business and Human Resource
14		Management from Holy Names College in Oakland. I have worked at PG&E
15		since 1980 holding several positions in Customer Services, Marketing
16		Department and the Energy Efficiency Department. My energy efficiency
17		experience includes certification as a residential auditor, performing home
18		and multi-family energy audits, program manager for several residential
19		programs and as a marketing representative performing commercial energy
20		surveys while managing many assigned commercial accounts.
21	Q 4	What is the purpose of your testimony?
22	A 4	I am sponsoring the LIEE program plans and budgets for program years
23		2009, 2010 and 2011.
24	Q 5	Does this conclude your statement of qualifications?
25	A 5	Yes, it does.

PACIFIC GAS AND ELECTRIC COMPANY STATEMENT OF QUALIFICATIONS OF MARDI E. WALTON

3	Q 1	Please state your name and business address.
4	A 1	My name is Mardi E. Walton, and my business address is Pacific Gas and
5		Electric Company, 77 Beale Street, San Francisco, California.
6	Q 2	Briefly describe your responsibilities at Pacific Gas and Electric Company
7		(PG&E or the Company).
8	A 2	I am senior regulatory analyst in the Customer Demand Side Management
9		Group in PG&E's Energy Proceedings Department.
10	Q 3	Please summarize your educational and professional background.
11	A 3	In 1992, I graduated from University of California, San Diego, with a
12		Bachelor of Arts degree in Economics. I joined PG&E in 2000 as an analyst
13		in the Capital Accounting Department. In 2001, I took the position of analysis
14		in the Corporate Accounting Department. In 2005, I took the position of
15		regulatory analyst in the Gas Revenue Requirements Department. In 2006,
16		I was promoted to senior regulatory analyst. In 2007, I became a senior
17		regulatory analyst in the Customer Demand Side Management group of
18		PG&E's Energy Proceedings Department.
19	Q 4	What is the purpose of your testimony?
20	A 4	I am sponsoring the Revenue Requirement and Rate Impact sections of the
21		Low Income Assistance Programs Program Year 2009-2011 Application
22		regarding the Low Income Energy Efficiency (LIEE) program and the
23		California Alternative Rates for Energy (CARE) program.
24	Q 5	Does this conclude your statement of qualifications?
25	A 5	Yes, it does.