

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

**Application of Pacific Gas and Electric
Company for Approval of the 2009-2011
Low Income Energy Efficiency and
California Alternate Rates for Energy
Programs and Budget**

**Application No. 08-05-022
(Filed May 15, 2008)**

(U 39 M)

**RESPONSE OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 M)
TO JUNE 25, 2008 ADMINISTRATIVE LAW JUDGE'S RULING SEEKING
FURTHER INFORMATION ON LARGE INVESTOR-OWNED UTILITIES'
2009-2011 LOW INCOME ENERGY EFFICIENCY/CARE
APPLICATIONS**

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I. INTRODUCTION

On May 15, 2008 each of the Investor Owned Utilities (IOU's) submitted applications for the LIEE and CARE programs for years 2009-2011. On June 25, 2008, an Administrative Law Judge's Ruling was issued containing 18 questions directed to each of the four IOU's. Questions 1 through 16 were addressed to PG&E. The responses below address those 16 questions.

**II. ADMINISTRATIVE LAW JUDGE'S RULING RESPONSES TO
QUESTIONS 1 THROUGH 16**

The specific responses to each of the questions directed to PG&E are set forth in the two separate attachments which are being transmitted herewith.

III. CONCLUSION

PG&E appreciates the opportunity to comment on these important issues.

Respectfully Submitted,

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ADMINISTRATIVE LAW JUDGE'S SECOND RULING SEEKING FURTHER INFORMATION ON LARGE INVESTOR-OWNED UTILITIES' 2009-2011 LOW INCOME ENERGY EFFICIENCY/CARE APPLICATIONS (June 25, 2008)

Questions for all large Investor-Owned Utilities (IOUs) (all other parties may respond as well)

Question 1a

Regarding the electric/gas split in your Low Income Energy Efficiency (LIEE) program budget (if you are an electric/gas utility):

a. Explain the origins of the split, the justification for it, and whether that justification still exists. See, e.g., Decision (D.) 89-07-062, 1989 Cal PUC LEXIS 829, at *59-60 (commencing low income energy program and directing budget split).

Answer 1a

For the period from 1993 through 1999, PG&E requested and received approval of its low income energy efficiency program in annual advice letter filings made on October 1 of each year. (See, e.g., Resolutions E-3585, dated December 17, 1998, and E-3586, dated January 20, 1999.) The funding levels were approved in PG&E's General Rate Case (GRC) through Decision 95-12-055. On March 26, 1999, the Commission directed the utilities to file applications on July 1, 1999, with their proposals for their program year 2000 low income programs in OIR 98-07-037. While PG&E was not able to find language as explicit as the language in D. 89-07-062 in laying out how to derive the gas/electric split for CARE administrative expenses, it is touched on several times in PG&E's uncontested testimony that was approved in CPUC decisions. For example, in the PY 2000 Testimony, Attachment 3, p. 3-2, PG&E states:

... To the extent that a cost can be attributed to a specific program, it will be allocated to that program (example: the costs of mandatory LIEE measures will be allocated to the mandatory category).

The gas/electric split proposed and approved was based on a forecast of electric and gas measure expenditures.

Question 1b

Explain how you calculate the split, and whether it is different from in the past.

Answer 1b

The methodology used to calculate the LIEE gas/electric split is consistent with the methodology used to calculate the split in the 2006-08 LIEE program. However, the expense ratio has been updated from 70/30 to 62/38 to reflect updates in LIEE measures for the 2009-2011 LIEE program. The 62/38 expense ratio proposed in the 2009-2011 LIEE program is based on a forecast of the cost

of electric and gas LIEE measures to be installed for PG&E's customers in the program period. The overall budget is calculated by first determining the total number of homes PG&E plans to serve in the 2009 - 2011 program period and applying historical percentages and current trends to this estimated population to determine the projected number of each measure to be installed from 2009 through 2011. The projected measure installation is then multiplied by the average cost of installation of each measure to determine the overall budget. For measures that are not clearly electric or gas, such as weatherization, a percentage was applied to allocate the costs between electric and gas. In the case of weatherization for example, PG&E again looked at historical data such as the type of heating element which is used to determine how a weatherization measure cost is allocated between commodities¹.

Question 1c

Should the calculation of the electric/gas split change, e.g., be based on the number of electric/gas customers of the utility, or some other basis other than that currently used?

Answer 1c

PG&E believes that the method proposed for the calculation of the electric/gas split is the best one available based on the current rules for recording electric and gas expenditures. For example, the ratio of electric and gas customers for PG&E is currently 55/45. The forecast of electric and gas expenditures of the 2009-2011 LIEE program is 62/38, which, as stated above, is based on projections of actual installations of gas and electric LIEE measures. Given the forecast electric / gas split of 62/38, if PG&E were to record the LIEE budgets based on the current ratio of electric and gas customers it would result in an undercollection for electric and an overcollection for gas.

Question 2

What is the suitable level of California Alternate Rates for Energy (CARE) penetration given the costs of acquiring customers? Is there a "break point" where the cost of acquiring new customers outweighs the benefits of extending the program universally?

Answer 2

PG&E is focusing its efforts on implementing those outreach initiatives which have proven lower costs per new enrollment, while still targeting initiatives towards harder-to-reach customers which generally cost more per new enrollment. PG&E hasn't determined a "break point" in outreach costs for acquiring new customers at this time and looks forward to discussing this issue further in the Quarterly Joint Utilities Low Income Public Meetings.

¹ For an extended discussion of PG&E's budget calculation please see PG&E Testimony, Chapter 1, Section VI.

Question 2a

For example, an estimated 10% of the eligible population for CARE is not willing to participate in the CARE program according to the KEMA Final Report on Phase 2 Low Income Needs Assessment, <http://docs.cpuc.ca.gov/Published/GRAPHICS/73106.PDF>. Should the Commission therefore assume that maximum possible penetration is 90 percent?

Answer 2a

Yes, PG&E believes that the KEMA estimate of 10% of all low income households being unwilling or unlikely to participate in the CARE program is reasonable. However, while PG&E continues to reach out to *all* of its eligible low income population, it is unlikely that PG&E will meet a 90% penetration target by 2011 as discussed in Answer 2b.

Question 2b

The KEMA Final Report also provided recommended penetration targets of 95% for SCE, 90% for PG&E and SDG&E, and 80% for SCG and recommended that the utilities be encouraged to exceed these targets where possible. What is the likelihood of meeting these targets and should the utilities be encouraged or directed to meet these targets?

Answer 2b

It is unlikely that PG&E will meet a 90% penetration target by 2011 due to the attrition of customers failing the recertification and post-enrollment verification processes and the difficulty of contacting and enrolling harder-to-reach customers in the program. PG&E will continue its outreach efforts to motivate all eligible and willing low income customers to enroll in the CARE program. PG&E supports the encouragement of the Commission in meeting any CARE enrollment targets, but opposes mandated targets.

Question 2c

According to IOU presentations at the June 2008 Low Income Oversight Board meeting, current CARE penetration levels are 79% (SoCalGas), 71% (SDG&E), 79% (SCE) and 73% (PG&E, but expected to drop to 70% after recertification of Tier 5 users). Why do these levels differ, and what should the Commission do about it?

Answer 2c

The PG&E, SCE, SCG, and SDG&E CARE program managers have been meeting bi-monthly since 2002 to discuss successful outreach, enrollment, and retention practices. The IOUs are working together closely to develop and implement processes that are effective in enrolling and retaining eligible customers. While many outreach methods have been successful for one or more utility, they may not be as successful for another due to differences in demographics within each service area (e.g. living arrangements, size of service

area, number of urban/rural customers, etc.). One difference is that SCE and SCG have a greater number of shared customers and are therefore able to leverage their outreach efforts in order to share enrollments. Additionally, with 29% of its estimated CARE-eligible customers residing in rural zip codes, PG&E has a much greater percentage of rural customers which are likely harder to reach. Finally, post-enrollment verification rates vary among the IOUs. On average, PG&E selects 11% of newly enrolled/recertified customers for post-enrollment verification on a monthly basis. Through June 30, PG&E has selected 33,663 customers for post-enrollment verification in 2008. On average, 65% of the selected customers fail to provide the requested income documentation and are dropped from CARE. One issue that the Commission should consider is more consistency in post-enrollment verification that still meets each IOU's operational needs and constraints.

Question 3

The Energy Efficiency program funds "Local Government Partnerships" throughout California. Have the IOUs looked at each of these partnerships as an opportunity to integrate the Energy Efficiency and LIEE programs, and to leverage local government resources in carrying out the LIEE program? Explain.

Answer 3

As stated on Page 4-12 of Chapter 4 (Integration Chapter) in PG&E's Demand Response filing:

"PG&E provides materials about its EE and DR programs to low-income customers at events, on customer bills, and on its web site. PG&E's LIEE program staff has been working particularly closely with PG&E's Local Government Partnerships (LGP) and Third-Party Program teams to use these distribution channels to complement rather than duplicate LIEE services, thus bringing more EE opportunities to more low-income customers."

PG&E will continue to look at each Partnership for 2009-11 and promote opportunities to expand outreach and implementation pertaining to LIEE programs.

PG&E's Energy Efficiency filing will include the following Moderate Income Direct Install (MIDI) program. In an effort to better link PG&E's Low Income Energy Efficiency (LIEE) program and Local Government Partnerships (LGP), PG&E is proposing the LIEE/LGP MIDI Program.

This pilot program will leverage LIEE infrastructure to provide audit and installation services to hard-to-reach moderate income customers in regions of PG&E's service territory where the LGP chooses to pilot the LIEE/LGP MIDI program.

Under the proposed MIDI program, LIEE contractors would be able to serve these hard-to-reach moderate income customers and the LGP would be able to implement residential services at a low incremental cost.

The LIEE providers participating in the LIEE/LGP MIDI program would be able to complete a home audit for qualifying customers and install the following list of free measures in the customer's home:

- Comprehensive Lighting
- Duct Sealing
- Attic Insulation
- Pipe Wrap
- AC Tune-Up
- Low Flow Showerheads
- Faucet Aerators

In the MIDI program design, the LGP partner will work closely with the LIEE prime and/or subcontractor (whichever is most appropriate) to coordinate action plans, including identifying target neighborhoods and connecting with local community organizations and neighborhood initiatives with extensive relationships with residents and community leaders.

Question 4

Are there objective metrics by which the Commission can or should analyze the effectiveness of the IOUs' efforts at leveraging (working with outside groups) and integration (combining or synthesizing internal demand side programs)? Some examples might include: money saved, resources shared, consolidation of work efforts, work hours saved, reduction in customer confusion, and/or number of customers served. Explain your position.

Answer 4

In consultation with the other utilities, PG&E believes that appropriately determined metrics will help generate greater enrollment, cost savings and move us toward achieving the Programmatic Initiative. PG&E also believes that these metrics must be reliable and credible from the perspective of key stakeholders including community-based organizations, regulators and the larger team of utility demand side management.

To ensure that these metrics for both leveraging and integration are not only objective but reliable and meet the needs of interested parties, PG&E proposes that the next Joint Utility Quarterly Public Meeting focus on developing a working group to determine both the best method for generating objective, reliable and credible metrics and the best method for obtaining buy-in from key stakeholders and interested parties including utilities, regulators, and community-based organizations.

While there are indeed multiple avenues to reach these goals of objective, reliable and credible metrics, PG&E believes that a research study managed and designed by a study team of interested parties including the IOUs, ED, DRA, CBOs and other low income assistance agencies, CSD, LIEE contractors and the LIOB, is the most direct method of obtaining these metrics and sees the Quarterly Meeting as a venue to examine and flesh out this strategy.

While we agree that possible metrics such as money saved, resources shared, consolidation of work efforts, work hours saved, reduction in customer confusion, and/or number of customers served are clear candidates, the exact weighting or feasibility of these metrics is very difficult to determine without either sound data or the input of impacted stakeholders who, for example, may or may not have compatible databases from which to share key information to develop or track metrics.

For these and other reasons, PG&E favors a discussion of these and related matters at the next commission mandated Low Income Joint Utility Public Meeting.

Question 5

Is the information produced in pilot LIEE programs shared among the IOUs? How are the pilots assessed? How are the results of the pilots communicated to other parties? What information is used to determine if a pilot should become a new program element/measure?

Answer 5

Yes, the information produced in LIEE programs is shared among the IOUs. LIEE program managers meet regularly to share and discuss successful strategies, best practices, and lessons learned for their LIEE programs. PG&E is very interested to see the results of the pilots, new measures and strategies being proposed by the other utilities and will strongly consider incorporating those that make sense for PG&E's service area into its LIEE program.

Pilots are typically proposed to test the feasibility and savings potential of new measures and new delivery strategies or processes, in a controlled and limited way before deciding to more fully incorporate them into the program. Pilots are also used to study the effectiveness of strategies that show particular benefits or limitations for different customer segments, based on factors such as climate zone, housing type, population density, family size, energy use, etc. PG&E proposed pilots to test several new measures, new delivery strategies and new partnerships.

PG&E will assess pilot program delivery, and installation challenges to determine the best way to incorporate these pilots into the regular program. PG&E will

report costs, installation rates and energy savings attributed to the pilots in its regular reports to the Commission, which is served on all parties to this proceeding. In addition, PG&E expects to discuss the pilots at the quarterly public meetings.

Question 5a

PG&E proposes a pilot to install 1,000 high efficiency clothes washers in single family homes with five people or more whereas SDG&E and SoCalGas propose implementing high efficiency clothes washers as a new measure. Which approach is preferred? Should the measure be treated consistently across utilities?

Answer 5a

PG&E prefers to test the feasibility of installing the new high efficiency clothes washer on a pilot basis first in order to test delivery strategies and fully understand the requirements and processes for assessing need, delivering and installing this new, very expensive measure as a way of limiting potential risk and managing costs prior to adding this as a new measure. Although PG&E does not expect any significant problems with the new measure, we proposed high efficiency clothes washers as a pilot measure in the 2009 LIEE program PG&E fully expects to incorporate high efficiency washing machines as a regular measure in LIEE in 2010 and 2011, incorporating any lessons learned. PG&E recommends waiting for the completion of the pilot before requiring all utilities to add this as a new measure.

Question 6

PG&E proposes a change in certification for its CARE sub-metered and expanded programs from one to two years. Currently, PG&E's single-family residential customers are required to recertify their eligibility every two years while customers with fixed-income are required to recertify every four years. Are certification rules consistent among the IOUs? Should CARE certification rules be consistent statewide? Should CARE certification rules be consistent for all types of customers and programs? Explain.

Answer 6

Yes, certification rules are generally consistent among the IOUs, with two-year certification for single-family residential customers, four-year certification for fixed-income customers, and one-year certification for tenants of sub-metered and other expanded programs. One area of difference is that PG&E certifies fixed-income sub-metered tenants for four years, while the other IOUs certify these for one year. The fixed-income certification requirement was authorized by the Commission in D.06-12-038. Another difference is the rate of post-enrollment verification, for which PG&E selects an average of 11% of newly enrolled/recertified customers on a monthly basis.

CARE certification rules should remain consistent statewide since all the IOUs have the same program eligibility requirements. However, each IOU should have the flexibility to implement processes, within the program guidelines, that best fit their internal requirements.

PG&E respectfully requests that the Commission approve the IOU's proposal to extend the CARE certification period for Sub-Metered and Expanded programs from one year to two years, resulting in greater consistency of certification rules among the Residential Single-Family, Sub-Metered, and Expanded CARE programs.

Question 7

In regard to public housing and Section 8 housing for purposes of LIEE and CARE, D.07-12-051, Ordering Paragraph 4 states: "Propose a process for automatically qualifying all tenants of public housing and tenants of Section 8 housing improving information to public housing authorities." Do all participants in such programs qualify for CARE/LIEE? Is each large IOU treating such participants equally for purposes of eligibility for CARE and LIEE? Should this public housing and Section 8 treatment be consistent statewide? If so, what proposed approach should be followed? Explain.

Answer 7

Not all participants of Section 8 (now known as Housing Choice Voucher program) and public housing qualify for CARE. Income limits are defined and established by Housing and Urban Development (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.

All of the tenants in the 30 percent of AMI (extremely low income) category qualify for CARE. None of the 80 percent of AMI (lower income) category tenants qualify. Some of the tenants in the 50 percent of AMI (low income) category qualify for CARE, while others do not. 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/Section 8 tenants within this category would be eligible for CARE.

It would be extremely difficult to make Public Housing and Section 8 treatment consistent state-wide, due to the varying qualification requirements in each county, differences among the IOUs' customer bases, Public Housing Authorities' (PHAs') strict confidentiality policies, and varying resources among the PHAs.

In its Application, PG&E proposes an initiative to recruit PHAs to become CARE Community Outreach Contractors (COCs). This would allow the CARE program to take a proactive approach to enrolling public housing/Section 8 tenants in the program while taking into consideration the aforementioned differences among PHAs and varying qualification requirements in each county. This would also allow the PHAs to actively participate in CARE outreach without violating HUD's strict confidentiality policy. If this approach were to be implemented, PHAs would become CARE program advocates and would inform current and potential (CARE-eligible) clients about the program. They would also receive a capitation fee for each newly-enrolled customer, providing them with an additional incentive.

PG&E LIEE program staff will also work with PHAs in its service area to integrate LIEE enrollment into the enrollment and intake process of the PHAs in their service area.

Question 8

Itemize your budgets for marketing/outreach for both CARE and LIEE in the ethnic media in the past two budget cycles and the 2009-2011 cycle. Give type of media (e.g., radio, TV, internet, print) and names of stations, channels/networks, websites, and publications. Should these budgets be increased? Which channels are most effective? Explain.

Answer 8

2006 CARE Media Program

PG&E spent \$100,000 on radio advertising for CARE. Radio commercials in English aired on 102.9 KBLX, in Chinese on 94.1 FM KVTO, and in Vietnamese on 1430 AM KVVN, throughout the greater San Francisco Bay Area. These commercials featured PG&E employees describing the program and encouraging the audience to apply for CARE, if eligible.

PG&E spent \$400,000 on print advertising for CARE by purchasing ad space in the Pennysaver newspaper/ coupon book. Pennysaver has an established distribution channel which is segmented by various criteria, such as income and household size. This newspaper directly targets PG&E customers across the service area, reaching over a million customers weekly. CARE information was printed in Pennysaver, and an application was included.

PG&E spent \$100,000 on television advertising for CARE, which consisted of producing and airing a commercial on KBCW Television station. The commercial featured a CARE customer describing her experience with the program, and a CARE employee providing information about how to apply.

2007 CARE Media Program

PG&E spent \$100,000 on radio advertising for CARE. Radio commercials in English aired on 102.9 KBLX, in Chinese on 94.1 FM KVTO, and in Vietnamese on 1430 AM KVVN, throughout the greater San Francisco Bay Area. These commercials featured PG&E employees describing the program and encouraging the audience to apply for CARE, if eligible.

PG&E spent \$400,000 on print advertising for CARE by purchasing ad space in the Pennysaver newspaper/ coupon book. CARE information was printed in Pennysaver, and an application was included (4 times throughout the year).

2008 CARE Media Program

PG&E is spending \$75,000 on ethnic radio advertising for CARE. Radio commercials were produced and are airing in English on 102.9 KBLX, in Chinese on 94.1 FM KVTO, and in Vietnamese on 1430 AM KVVN, throughout the greater San Francisco Bay Area.

PG&E is spending \$75,000 on television advertising for CARE, which consists of producing and airing a commercial on KBCW Television station. The commercial features two CARE customers describing their experiences with the program, as well as the CARE program manager providing information about how to apply.

PG&E is spending \$10,000 on print advertising for CARE by purchasing ad space in the Pennysaver newspaper/coupon book. PG&E received a significant discount on the purchase of this ad space (as compared to the previous year) as a result of a last-minute cancellation by another Pennysaver client. PG&E printed information and inserted a CARE application in the Pennysaver.

Finally, PG&E is spending \$65,000 on a CARE pilot project in partnership with SABREesPODER, an organization that provides advertising and outreach opportunities in the Mexican consulates throughout California. This project will include the production and airing of a 3-minute Hispanic commercial in the Fresno and San Francisco Mexican consulates. It will also include inserting the CARE application in the resource guides that are made available to Mexican immigrants.

2009-2011 CARE Media Program (leveraging LIEE)

In its Application, PG&E requests an increase to its CARE program media budget of \$300,000 (annually) for the 2009-2011 budget cycle, as compared to the 2008 media budget. PG&E projects spending \$300,000 on television advertising, \$125,000 on radio advertising, and \$100,000 on print advertising for CARE.

The KEMA Final Report recommends that the PG&E CARE program participate in television, radio, and print media for *each* of its major ethnic markets. PG&E plans to partner with television and radio stations to produce commercials targeting Chinese, Vietnamese, Hispanic and African American customers, thus incurring production and air-time costs with each media outlet. PG&E also plans to produce and print advertisements in newspapers and/or magazines targeting each of these ethnic markets. The production, air-time, and printing costs required to reach these markets are estimated at \$300,000.

Television is a highly effective channel of communicating CARE information, whereas it constitutes one of the primary means utilized by the target audience to obtain news and resources. This method of receiving information is especially common among ethnic customers, due to the fact that they are often not fluent in the English language, and hence are limited to watching television programs in their native language. Print media is also an effective medium of communicating CARE information to potential customers. This is due to the fact that it is often possible to include CARE applications in print advertisements, thus placing the opportunity to enroll in the hands of eligible customers.

LIEE 2009 - 2011

LIEE has not previously had a separate media program, and thus has no previous media spending. PG&E's 2009-2011 LIEE program will leverage CARE outreach efforts, as described in PG&E's LIEE testimony. Rather than duplicating effort and cost, PG&E's LIEE program team is integrating print 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.

Question 9

How many jobs in communities served by the CARE and LIEE programs have these programs created over the last two program cycles? What kind of jobs were created, and what are the demographics of those employed? (The jobs must have gone to low-income persons, and may involve direct IOU employment, employment as program contractors and subcontractors, and/or employment at community based organizations. The jobs must also be in furtherance of the LIEE and CARE programs.) Will the 2009-2011 programs create similar jobs? If so, answer the foregoing questions about the jobs and employees/contractors.

Answer 9

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. See Attachment A-Question 9 for the types of jobs created by the Low Income Programs.

PG&E does not collect household income information from its employees, contractors or subcontractors, however, 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.

Following is a table summarizing the ethnicity of PG&E's LIEE subcontractor staff working on the LIEE program.

Ethnicity of Subcontractors Working in PG&E's PY 2008 LIEE Program

Total Number of Persons	Ethnicity
76	African American
9	American Indian
244	Caucasian
361	Hispanic
59	Asian/Pacific Islander
40	Other
789	Total Subcontractor Individuals Working on PG&E's LIEE Program

Because the proposed 2009-2011 LIEE program is greatly increased in budget and scope, PG&E anticipates a commensurate increase in field staffing necessary to successfully implement the program (including enrolling and educating participants, assessing their homes, and installing measures). PG&E also anticipates increased office staffing both at PG&E and at contractor and subcontractor offices to meet increased reporting, dispatch and scheduling, invoicing, database and other program management and oversight requirements.

PG&E does not anticipate that any jobs specific to CARE would be created in the community. The jobs performed by PG&E's CARE Outreach Contractors are incremental to their regular job responsibilities (for which reason COCs are paid a \$15 capitation fee).

Question 10

What, if any, type of Smart Meter/advanced meter education are the IOUs providing as part of the LIEE program? Should the Commission fund any Smart Meter/advanced meter education programs in advance of broad availability of the meters in homes? Will the education results last if education happens in the

2009-2011 period and the IOUs do not make the meters ubiquitous until 2011 and later? Explain.

Answer 10

PG&E is planning to provide education to customers about the SmartMeter™ program that will reach all customers on a geographic basis as coordinated with meter installation activities so that customer education material is received timely. PG&E requested an additional \$40,000 in the LIEE 2009-2011 application to ensure customer education activities are closely integrated. PG&E believes that beginning the education process now will benefit customers even if some features of the program will not be available until later.

Question 11

SDG&E proposes a light emitting diode nightlight program that costs pennies a year. Given the large electric energy burden represented by lighting, have the other IOUs considered this measure as part of their program? If not, explain why.

Answer 11

PG&E currently gives light emitting diode nightlights to all LIEE customers that are post-inspected, but has not considered these a program measures with associated impacts. PG&E will assess giving nightlights to all LIEE participants during the initial energy education based on SDG&E impact evaluation.

Question 12

Are there other programs that one IOU offers that the Commission should require all IOUs to offer because they are cost-effective, produce high energy savings, or have other positive attributes for LIEE customers? Explain.

Answer 12

No, there are no specific measures that the Commission should require all IOUs to offer. Some measures or strategies are only effective under certain conditions, or in specific areas (for example, governed by climate zone, population density, geographic region, culture or other factors). Additionally, testing pilots or new projects in different areas allows more measures and strategies to be tested at less cost to any one utility. PG&E is very interested to observe the effects of the different new measures, pilots and strategies that the other IOUs have proposed.

PG&E encourages the Commission to allow the IOUs to fully implement the measures, program elements and pilots that have been recommended in their 2009-2011 Applications. PG&E recommends that new measures and strategies be evaluated to determine if the measure or pilot is feasible, effective and worthy of statewide consideration. In recent years the IOUs have implemented several new measures that have not proved to be as beneficial as initially envisioned,

i.e., whole house fans. An effective process for introducing and evaluating new measures and program efforts is an important component to determining statewide adoption of a new measure/program.

Question 14

The IOUs propose setting the base year for calculating the programmatic initiative to 2002 and eliminating the 10-Year “Go-Back” Rule, citing the inclusion of “Rapid Deployment” measures in the LIEE program as a reason for this modification. How drastically has the program changed since 2002 and are such changes reason enough to justify this modification?

Answer 14

In consultation with the other utilities, PG&E notes that D.07-12-051 directs the utilities to “[e]liminate or modify the ten year “go back” rule to permit installations of new measures and technologies in all households while avoiding duplicative installations”. In their applications, the IOUs are not proposing to eliminate the ten year “go-back” rule and instead propose to make the following modifications/exceptions to be added to "Section 2.8 Previous Participation" of the 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.

In setting the base year for calculating the programmatic initiative, the IOUs evaluated a number of issues relative to the goal of the programmatic initiative and making low income homes energy efficient. Historically, the IOUs have adhered to the Statewide Policies & Procedure Manual’s “10 year rule” and counted all of those homes treated in the last 10 years as homes that had been previously served by the LIEE program, and therefore were not currently eligible for participation. When evaluating this requirement and assessing the levels of service provided to customers over the past 10 years, the IOUs 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,” because only a few new measures have been introduced to the LIEE program since that time. The table below provides a high-level overview of the measures added and removed from the LIEE program between 2001 and 2007.

Program Year	Measure Added	Measure Removed	Utility
Mid-2001 (Rapid Deployment)	Air Conditioning (A/C)		PG&E, SCE, SDG&E
	Duct Testing and Sealing		All
	Gas and electric water heaters		All
	Set-back thermostats		All
	Evaporative Cooler Maintenance		PG&E, SCE, SDG&E
	Whole house fans		PG&E, SCE, SDG&E
	Refrigerator (for renters)		PG&E, SCE, SDG&E
	Hard-wired porch light fixtures (for renters)		PG&E, SCE, SDG&E
	Evaporative Cooler (for renters)		PG&E, SCE, SDG&E
2002	None	None	n/a
2003	None	None	n/a
2004		High Efficiency Water Heaters	All
		High Efficiency Central A/C	PG&E, SCE, SDG&E
		Duct Testing and Sealing	All
		Evaporative Cooler Maintenance	PG&E, SCE, SDG&E
		Set-back thermostats	All
		Whole House Fans	PG&E, SCE, SDG&E
2005	Replacement of water heaters leaking from the tank*		All
	Go-back refrigerator replacement*		PG&E, SCE, SDG&E
2006	Energy Efficient Central A/C (Climate Zones 14 and 15 only)**		All
	Duct Testing and Sealing		All
2007	Interior Hard-Wired Compact Fluorescent Lights		All
	Energy Efficient Central A/C (Climate Zone 13)**		SCE
	Central A/C Tune-Up/Service		All
	Tankless Water Heater		SCG and SDG&E
	Torchiere Replacement		SCE and SDG&E
	Evaporative Cooler Maintenance		SCE

* Introduced during 2005/2006 Winter Initiative and remained in program.

** Go back measures - SCE only

*** Installed on a limited basis, based on the cost of installation.

As illustrated in the table above, many of the measures in today's LIEE program were introduced in mid-2001 and the IOUs are proposing that homes treated since the end of 2001 be considered energy efficient when determining the basis for total number of eligible LIEE customers to be served between 2009-2011. Homes that were serviced between 1999 and 2001 did not receive the benefits from "Rapid Deployment" measures and for this reason the IOUs are proposing that these homes not be considered energy efficient when determining the basis for total number of eligible LIEE customers to be served between 2009-2011. In fact, PG&E notes that homes serviced by LIEE between 1999 and 2001 will become eligible for services during the 2009-2011 program cycle as the ten year rule will no longer be a restriction on eligibility

Question 15

SDG&E and SoCal Gas propose a Customer Rewards Program to provide incentives for energy savings. Will this program be available to all LIEE customers or only new LIEE customers? What is the best type of reward to provide as a component of LIEE to low income populations? Should the Customer Rewards Program be implemented statewide? Explain.

Answer 15

PG&E is interested to see the results of SDG&E and SoCalGas's Customer Rewards Program.

Question 16

How did you calculate your energy savings figures?

Answer 16

An impact evaluation of the Program Year 2005 LIEE program (2005 LIEE Impact Evaluation) was completed by a study team led by West Hill Energy & Computing. The final report was filed on December 19, 2007 and savings factors from this study were used to estimate potential savings for the 2009-2011 LIEE program. Measure impacts that were not available from the 2005 Evaluation Study were taken from DEER, internal workpapers, or previous LIEE and EE evaluations (including the LIEE PY2001 Evaluation and LIEE Itron Measure Assessment.)

The primary method for estimating program savings in the PY2005 Impact Evaluation was a statistical analysis of monthly bills for both LIEE participants and non-participants. Additional surveys provided sufficient information to calculate alternative estimates of savings for some measures.

Question 16a

Are those savings based on average energy savings across all users?

Answer 16a

Energy savings are based on average energy savings across all LIEE participants. In most cases, savings are calculated for users in a particular housing type (single family, multi-family or mobile home). For weather-sensitive measures, savings were further disaggregated by climate zone.

Question 16b

Should the energy savings calculations be different depending on the segment of the population a measure will serve? For example, will energy savings differ among high and low users?

Answer 16b

Energy savings calculations could be different depending on the segment of the population a measure will serve. In addition to reporting savings estimates by housing type, the PY2005 Impact Evaluation also reported savings by pre-installation usage levels. According to the PY2005 study, in some cases, pre-installation usage was a better indicator of savings levels than either housing types or climate zones. For measures where there are enough installations to allow for estimation among customer usage levels, this method could be employed in future evaluations.

Question 16c

If your answer to b) is yes, should these changes become part of the impact evaluation study you propose in your budget applications?

Answer 16c

Yes, customer energy usage could be considered as a variable in calculating impacts for measures where there are enough installations to allow for statistically significant estimations. However, PG&E notes that disaggregating savings could add additional cost to the evaluation, and the Commission should consider whether there is added value contributed from calculating highly disaggregated results. An evaluation of impacts by energy use could be highly effective information for segmentation program strategies, however if the main purpose of the evaluation will be only to determine total program energy savings, then averaging savings across all the participating customers will have the same overall result.

Attachment A - Question 9

PG&E				
Employee Type	2008	2009	2010	2011
Management	10	13	15	15
Support Organizations	5	9	9	9
Inspection Team	54	57	59	59
Total	69	79	83	83

RHA/Prime Contractor**				
Employee Type	2008	2009	2010	2011
Managers/Supervisors	10	-	-	-
Field Techs	13	-	-	-
IT Programers	2	-	-	-
Customer Service Reps	5	-	-	-
Admin Staff	10	-	-	-
Total	40	-	-	-

Sub Contractors Weatherization***				
Employee Type	2008	2009	2010	2011
Managers/Supervisors	88	-	-	-
Field Staff (ES, WS, NGAT)*	584	-	-	-
Admin. Staff	112	-	-	-
Total	784	-	-	-

Sub Contractors Appliance***				
Employee Type	2008	2009	2010	2011
Managers/Supervisors	9	-	-	-
Delivery Crew	30	-	-	-
Admin. Staff	12	-	-	-
Total	51	-	-	-

LIHEAP Leveraging Partners				
Employee Type	2008	2009	2010	2011
Organizations **	9	-	-	-
Total	9	-	-	-

Repair and Replacement Contractors***				
Employee Type	2008	2009	2010	2011
Organizations**	15	-	-	-
Total	15	-	-	-

*ES - Energy Specialists, WS - Weatherization Specialists, NGAT - Natural Gas Appliance Test Tech

** Number of contractor organizations that work on the LIEE program. Work will be bid out to the contractors once the Prime contractor is awarded.

*** Includes private contractors, CBOs and LIHEAP agencies

NOTE: Work will be bid out to all program contractors once the Prime contract is awarded. Numbers of employees for 2009-2011 is unknown, but is anticipated to increase so that sub-contractors can meet increased program goals.

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ALJ Assigned: Sarah R. Thomas on May 30, 2008

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