

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

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

**ANNUAL REPORT OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 M) ON THE
RESULTS OF ITS LOW INCOME ENERGY EFFICIENCY AND CALIFORNIA
ALTERNATIVE RATES FOR ENERGY PROGRAM EFFORTS FOR PROGRAM YEAR 2010**

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Dated: May 2, 2011

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In accordance with Decision 05-10-041, Ordering Paragraph 2, and the report requirements in Decisions 89-07-062 and 01-03-028, Pacific Gas and Electric Company files this Annual Report on the results of its Low Income Energy Efficiency (LIEE) and California Alternative Rates for Energy (CARE) program efforts for the 2010 program year. In previous years, the LIEE and CARE Reports were submitted separately. Beginning with the 2009 program year, the Energy Division and Joint Utilities agreed to minimize the reporting requirements by combining the reports and to standardize the report templates and tables. Today's report reflects these changes.

Respectfully submitted,

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/s/

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Pacific Gas and Electric Company

Low Income Energy Efficiency (LIEE) AND California Alternate Rates for Energy (CARE)

Program Annual Report For Program Year 2010

May 2, 2011

LIEE AND CARE PROGRAMS ANNUAL REPORT

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LOW INCOME ENERGY EFFICIENCY PROGRAM

1. LIEE Executive Summary

Pacific Gas and Electric Company (PG&E) has offered free energy efficiency programs to income-qualified customers in its 48 counties since 1983. The Low Income Energy Efficiency (LIEE) program's objective is to help income-qualified customers reduce their energy consumption and costs while increasing their comfort, health and safety. The LIEE program, marketed to PG&E customers in 2010 as the Energy Partners Program,¹ utilizes a "whole house" approach to provide free home weatherization, energy efficient appliances and energy education services to income-qualified PG&E customers throughout the Company's service area.

The LIEE program is ratepayer-funded and is available to PG&E customers living in all housing types (single family, multifamily, and mobile homes), regardless of whether they are homeowners or renters. To qualify for the LIEE program, the total customer household income must be equal or less than 200 percent of the Federal Poverty Guidelines, with income adjustments for family size. The 2010 program treated 133,329 homes with a mix of measures and services, including energy education, energy efficient appliances, and home weatherization.

The 2009-2011 LIEE program was authorized by the California Public Utilities Commission on November 10, 2008 in Decision (D.) 08-11-031. PG&E's authorized annual LIEE program budget for 2010 was \$167,846,910 million.

1.1. Alignment of LIEE with Strategic Plan Goals and Strategy

The long-term California Strategic Plan vision for the LIEE program is to have 100% of all eligible and willing low income customers receive all cost effective Low Income Energy Efficiency measures by 2020. The Plan lays out two goals in achieving the LIEE vision: 1) By 2020, all eligible customers will be given the opportunity to participate in the LIEE program, and 2) The LIEE programs will be an energy resource by delivering increasingly cost-effective and longer-term savings.

¹ D.08-11-031 and D.09-10-012 mandated that PG&E and the other investor-owned utilities develop a new statewide name and brand identity for the LIEE program. The IOUs developed a new name during 2010, the *Energy Savings Assistance Program*. This name is being implemented in 2011. This 2010 Annual Report continues to use the LIEE and Energy Partners program names, since those are the names used for this program throughout 2010.

**1.1.1. Please identify the IOU strategies employed in meeting
Goal 1: Improve Customer Outreach**

Implementation Plan and Timeline		
Strategies	Near Term 2009 – 2011	IOU strategy employed this program year
1.1: Strengthen LIEE outreach using segmentation analysis and social marketing tools.	<ul style="list-style-type: none"> Identify, implement and evaluate effective marketing, education and outreach methods for targeting low income customer segments. Use social marketing to effectively engage low income customers in program participation. 	<p>In 2010, PG&E identified and implemented effective outreach methods for segmenting and targeting its low income customers, including:</p> <ul style="list-style-type: none"> Multi-ethnic television campaigns: Targeting Vietnamese, Hmong and African-American customers; Bilingual (English/Spanish) bill inserts targeting 5.2 million residential customers per run; Direct Mail letters sent to targeted neighborhoods notifying customers of their likely eligibility for the LIEE program; Multi-ethnic radio campaigns: Spanish, Chinese, Vietnamese and English radio ads across the service area; Automated Voice Messaging focused in neighborhoods where PG&E estimates 80% or more of the residents qualify for LIEE services; Events & Presentations; and Multilingual Collateral including door-hangers, postcards and one-page flyers.
1.2: Develop a recognizable and trustworthy Brand/Tagline for the LIEE programs.	<ul style="list-style-type: none"> Develop a statewide program name and description for LIEE which is coordinated with the ME&O efforts for energy efficiency, demand response and any other demand-side options. Implement branding. 	<p>During 2010, PG&E worked closely with Energy Division and the other IOUs to develop a statewide program name and description for LIEE. Energy Division hired a consultant in 2010 to accomplish this goal. PG&E is actively participating in this statewide LIEE/EE team effort and is implementing the new <i>Energy Savings Assistance Program</i> name in 2011.</p>
1.3: Improve program delivery	<ul style="list-style-type: none"> Use information from segmentation analysis to achieve efficiencies in program delivery. Leverage with local, state, and federal agencies as well as other organizations to increase seamless coordination, efficiency and enrollment. 	<p>PG&E began a Low Income Household Market Segmentation Study (with SCE) in 2009 to better target outreach to potential LIEE customers. This analysis continued during 2010 and will be completed in 2011.</p> <p>PG&E's LIEE program outreach team worked with many local, state and federal agencies and other community organizations to promote the LIEE program and enroll new customers.</p>

Implementation Plan and Timeline		
Strategies	Near Term 2009 – 2011	IOU strategy employed this program year
1.4: Promote the growth of a trained LIEE workforce.	<ul style="list-style-type: none"> • Incorporate LIEE training needs into the Workforce Training needs assessment. • Develop Training Roadmap which includes funding requirements and sources other than IOUs. • Implement LIEE workforce education and training. 	<p>PG&E is working with Energy Division to implement the Low Income Workforce, Education and Training pilot.</p> <p>PG&E's LIEE trainers are actively involved with the Statewide Workforce, Education and Training efforts to help CA education and training facilities develop appropriate curricula for training energy and weatherization specialists capable of working in PG&E and other energy programs.</p> <p>In 2010, PG&E trainers conducted 58 sessions for 896 students representing a total of 4,784 student days of LIEE training. This constituted an increase of over 5% from 2009 and over 45% since 2008.</p>

**1.1.2. Please identify the IOU strategies employed in meeting
Goal 2: LIEE is an Energy Resource**

Implementation Plan and Timeline		
Strategies	Near Term 2009 – 2011	IOU strategy employed this program year
2.1: Increase collaboration and leveraging of other low income programs and services	<ul style="list-style-type: none"> • Identify key areas where data sharing would be possible and advantageous. • Develop partnerships with community organizations and other agencies to leverage resources available from local governments, federal, state, and private project funding sources. 	<p>In 2010, PG&E continued to share LIEE program data with the other IOUs to help automatically enroll income-qualified customers into each utility's LIEE and CARE programs. Most data sharing agreements enroll customers into the CARE program. CARE customers are targeted by PG&E's LIEE subcontractors for participation in the LIEE Program. Data sharing of CARE customers already occurs between PG&E and SMUD, MID, and LIHEAP.</p> <p>PG&E saw high penetration rates in approximately 40 neighborhoods.</p> <p>Highlights for Whole Neighborhood Approach activities included:</p> <p>Partnering with many agencies and local governments to leverage resources. In Sacramento, PG&E partnered with SMUD, local LIHEAP provider Community Resources Project and LIEE contractor Naildown Construction to sweep the Avenues neighborhood for</p>

Implementation Plan and Timeline		
Strategies	Near Term 2009 – 2011	IOU strategy employed this program year
		<p>enrollees.</p> <p>In Fairfield, PG&E partnered with the city to reach multiple neighborhoods that were a good fit for the program. That relationship continues to grow in 2011.</p>
<p>2.2: Coordinate and communicate between LIEE, energy efficiency and DSM programs to achieve service offerings that are seamless for the customer.</p>	<ul style="list-style-type: none"> • Ensure LIEE participants are aware of energy efficiency and DSM/EE programs. • Coordinate with CSI programs to provide LIEE program services in qualified low income housing for both single family and multifamily CSI programs. • Coordinate AMI delivery and LIEE Programs. 	<p>PG&E distributed joint program brochures in multiple languages to describe PG&E rate discounts and energy efficiency services/programs available to help customers.</p> <p>PG&E program staff from rates, energy efficiency, solar programs, and metering departments came together at many customer events in 2010 to explain the services we offer to help customers with their bills and energy use. PG&E staff demonstrated SmartMeters and other new technologies to customers. Energy Specialists learned about Smart Meter characteristics and use of the built in demand meter.</p> <p>PG&E program staff from multiple areas meet together regularly to discuss and explore integration opportunities.</p>
<p>2.3: Provide low income customers with measures that result in the most savings in the LIEE program.</p>	<ul style="list-style-type: none"> • Assess design of programs to ensure increasingly cost effective measures, while reducing low income customers' bills and improving quality of life. • Continue to include measures that provide long term energy savings, such as refrigerators. 	<p>New impact and process evaluations of the 2009 LIEE program are being conducted to assess program design and impacts. PG&E is also participating with Energy Division and the other utilities on a new study to update and assess non-energy benefits. These studies will be completed in 2011.</p> <p>PG&E regularly solicits new measure ideas and suggestions from contractors and others at quarterly public meetings and LIEE contractor meetings. PG&E also requests suggestions from PG&E's EE research staff and looks at measures included in other EE and LIEE programs throughout the U.S.</p>
<p>2.4: Increase delivery of efficiency programs by identifying segmented concentrations of customers.</p>	<ul style="list-style-type: none"> • Identify and develop segmented approach to deliver services to households. • Improve use of CBOs in delivering services. 	<p>PG&E is conducting a Low Income Household Market Segmentation Study in 2009–2011 to identify and develop a segmented approach. During 2010, LIEE staff worked closely with CARE outreach and in-house marketing experts to help develop effective outreach methods. PG&E also continued to work with LIEE subcontractors and community agencies to target and reach out to hard-to-reach</p>

Implementation Plan and Timeline		
Strategies	Near Term 2009 – 2011	IOU strategy employed this program year
		<p>and at-risk customers.</p> <p>PG&E provided ZIP-7 eligibility breakdowns to our subcontractors to help them locate and target areas with high poverty demographics. Additionally, PG&E-managed automated outbound voice messaging, text messaging and direct mail campaigns were targeted in the top 20% estimated eligible ZIP-7s.</p> <p>A great example of PG&E's success in identifying segmented concentrations of customers occurred in San Francisco's Tenderloin neighborhood. With support from PG&E in the form of automated outbound phone calls, radio and television advertising, local contractors were able to treat nearly 1,000 units over the course of 2010.</p> <p>In 2010, PG&E had 65 subcontractors working in our LIEE program. 12 of these were CBOs who know their communities well and are able to identify pockets of customers likely to qualify for LIEE services.</p>

1.2. Low Income Energy Efficiency Program Overview

1.2.1. Provide a summary of the LIEE Program elements as approved in Decision 08-11-031:

PY 2009 LIEE Program Summary			
	Authorized / Planning Assumptions [1]	Actual	%
Budget	\$ 167,846,910	\$ 143,737,628	85.6%
Homes Treated	124,991	133,329	106.7%
kWh Saved	42,600,000	49,851,924	117.0%
kW Demand Reduced	7,560	12,399	164.0%
Therms Saved	1,510,000	2,714,247	179.8%

[1] Budget and Homes Treated were authorized in D.08-11-031; kWh, kW and Therm savings are planning assumptions, from PG&E 2009-2011 LIEE-CARE Program Application Testimony, May 15, 2008.

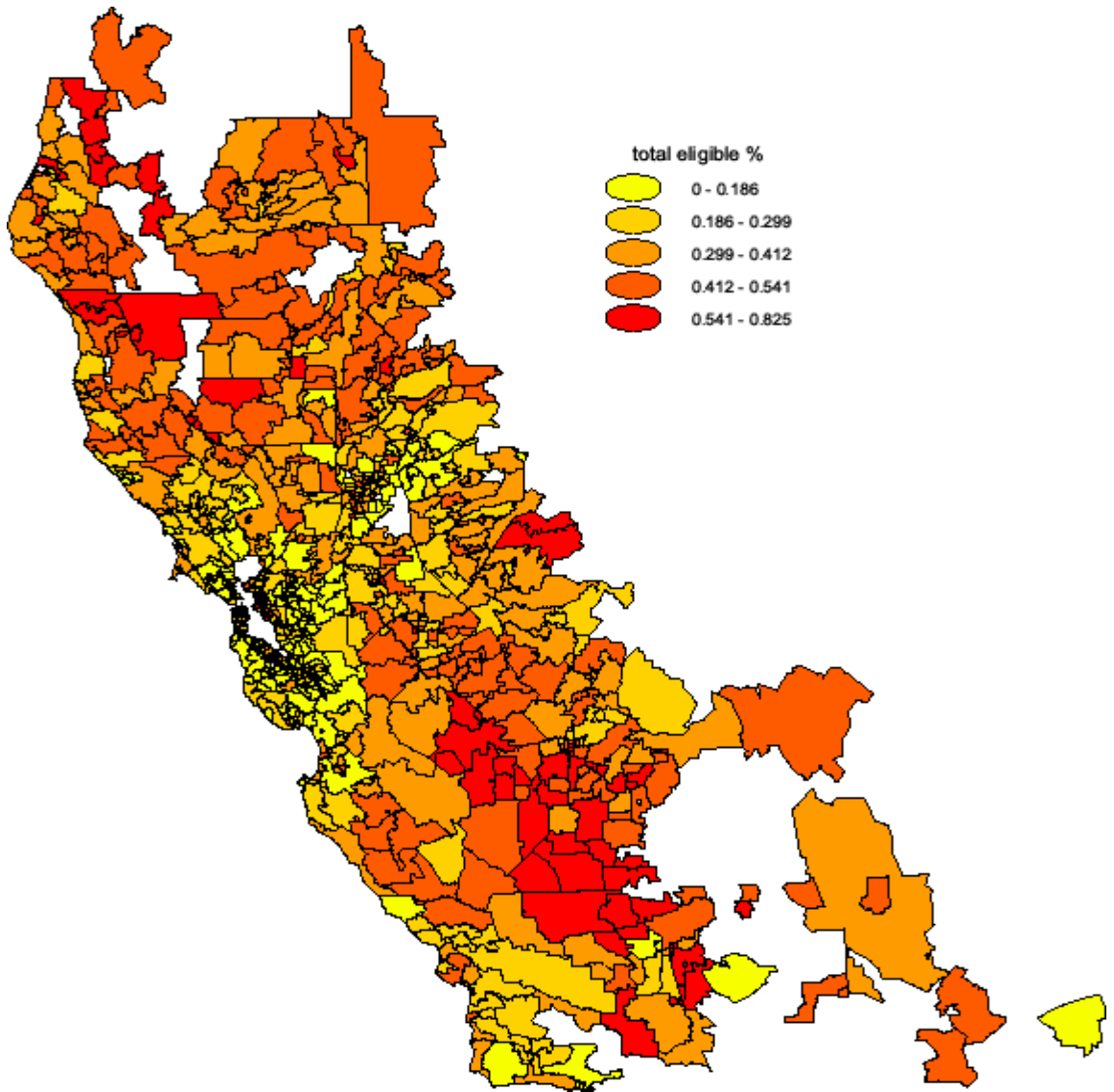
1.3. Whole Neighborhood Approach (WNA) Evaluation

- 1.3.1.** Provide a summary of the geographic segmentation strategy employed, (i.e. tools and analysis used to segment “neighborhoods,” how neighborhoods are segmented and how this information is communicated to the contractor/CBO).

PG&E identifies and targets neighborhoods with large populations of low income customers, usually utilizing ZIP-7 boundaries. Program staff will normally use census tract information or even more purposefully chosen areas, such as the Strong Neighborhood Initiative areas in San Jose, when working with a government agency. Energy usage, delinquent payments, and previous LIEE participation information is also correlated to help determine promising areas to target for WNA efforts.

PG&E is currently conducting a Low Income Household Market Segmentation study with SCE that is expected to generate valuable information for targeting and enrolling income-qualified LIEE customers, as well as to identify potential neighborhoods and communities to outreach in the future. PG&E provides more detail on customer segmentation and LIEE outreach approaches and strategies in Section 1.3.2.

The following map shows the percent of PG&E customers eligible for LIEE by county.



- 1.3.2.** Provide a summary of the customer segmentation strategies employed (i.e. tools and analysis used to identify customers based on energy usage, energy burden and energy insecurity) and how these customer segments are targeted in the Whole Neighborhood Approach to program outreach.

In D.08-11-031 and the subsequent Whole Neighborhood Approach White Paper, the Commission described a Whole Neighborhood Approach to LIEE installation under which the IOUs install all feasible measures in the homes of eligible customers on a neighborhood-by-neighborhood basis. The Commission believes this approach will increase energy savings, reduce overhead and transportation costs, and encourage leveraging with local entities.

The following is a discussion of PG&E's ideas, plans, and 2010 experience for successfully reaching the LIEE-eligible population through Whole Neighborhood Approaches and other targeting strategies.

Neighborhood Identification

Identify neighborhoods with large numbers of low income customers with the aid of census or other demographic information. Within each neighborhood, identify customers based on energy usage. We expect the IOUs to use their customer databases to the maximum extent possible to target neighborhoods and customers before sending contractors into the field. (D.08-11-031)

PG&E identifies neighborhoods with large numbers of low income customers with the aid of census and other demographic information and correlates it with PG&E customer energy usage information, as directed in D.08-11-031.

PG&E currently implements its LIEE program in a "whole neighborhood approach". PG&E's LIEE implementation contractors typically arrange their appointments geographically to reduce their costs and enroll participants by canvassing likely neighborhoods. PG&E provides its LIEE implementation contractors with a database of CARE customers to help them identify and target potential neighborhoods to canvass, call or mail information.

In addition to continuing to share its CARE customer data with LIEE contractors, PG&E analyzes and selects potential target neighborhoods with the key variables defined by the Commission in D.08-11-031: high incidence of poverty and high energy use, as well as high energy insecurity.²

² Energy burden is the percent of income that goes towards payment of energy bills, and energy insecurity refers to customers experiencing difficulty in paying energy bills and actual or threatened utility shut-offs.

To identify potential neighborhoods to target for the LIEE programs, PG&E starts with its estimates of LIEE eligibility by ZIP-7, derived from census data.³ PG&E ranks ZIP-7 areas with the highest populations of estimated LIEE-eligible customers⁴ in its service area and correlates them with information on PG&E customer energy use,⁵ the number of 48-hour shut-off notices sent and actual shut-offs over the last year. PG&E also correlates this data with the current CARE penetration rate and the number of customers who have already participated in LIEE since 2002 (thus making them ineligible for participation at this time).

Using this information to help determine potential neighborhoods to approach with the LIEE program, PG&E's LIEE program managers work with both internal and external groups to help make each neighborhood event a success and continue to generate LIEE participation in other neighborhoods in the local community. PG&E works closely with its LIEE implementation contractors, CARE outreach contractors, PG&E local government relations and communications staff, and state Low Income Home Energy Assistance Program (LIHEAP) agencies to help establish contact with government representatives and neighborhood leaders.

Outreach

Target customers within each neighborhood based on energy usage, with high energy users targeted more aggressively. (D.08-11-031)

PG&E identifies and selects potential neighborhoods for outreach events and other activities as described above, based on incidence of poverty, energy use and energy

³ The joint utility methodology to derive the number of customers potentially eligible for CARE and LIEE services in each utility's service area was adopted by the Commission in Decision 01-03-028 and is updated annually. 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 2009 sample data; utility meter and master meter household counts; Department of Finance CPI series; and various Geographic Information System (GIS) sources. ZIP-7s are smaller breakdowns of postal ZIP Codes that are used for small area research in census data. They are the smallest geographical area for which reliable income and demographic data is available.

⁴ Customers with household incomes at or below 200% of the Federal Poverty Level are eligible for both LIEE and CARE.

⁵ To calculate energy use, PG&E's electric customers were divided into low, medium and high tiers, based on their electric use at Tiers 1-2 (Low Electric Use below 130% of baseline), Tier 3 (Medium Electric Use from 131% to 200% of baseline) and Tiers 4-5 (High Electric Use above 200% of baseline). A customer is considered at the highest tier use if they overused electricity 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 atypical 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 six-month billing history to be eligible to participate in the program. Customers with less than a six-month history will be re-evaluated after they have sufficient billing history.

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.

insecurity. Following is PG&E's approach to outreaching to customers to participate in the LIEE program.

Currently, much of PG&E's 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. This database is updated on a weekly basis to include new CARE enrollments as well as other new PG&E customer account information (such as new service, service stops and moves). 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 supports its contractors in these successful marketing and outreach strategies. PG&E's most important strategy to enroll LIEE participants for 2009-2011 is helping its contractors mine the CARE list for leads. PG&E's CARE program ended 2010 with a 93 percent penetration rate among eligible low income customers. It is also prudent 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 has combined its marketing and outreach with its highly successful CARE team. To increase participation in the LIEE program, PG&E leverages 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 Community 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.

By partnering with the CARE outreach team, LIEE also takes 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.

PG&E coordinates LIEE neighborhood events with scheduled CARE events and communicates these events in advance through targeted mailings, door hangers, local community partners (including but not limited to civic and social leaders, churches, and low income service agencies), and local media communications (print, radio and television). PG&E's LIEE outreach staff works to publicize and promote events with local community and civic leaders and to enlist their support and partnership in making

neighborhood events a success. PG&E contractors carry door hangers and leave them at the homes of customers not home at the time of the neighborhood visit. The door hanger includes program information and contact information so that the customer can schedule a visit.

During 2009-2011, PG&E is identifying and targeting 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 enroll.

During 2009-2011, PG&E is also collaborating with communications and marketing teams working on other Energy Efficiency programs to promote opportunities that may be advantageous and feasible to low income customers. PG&E's LIEE program management staff meets regularly with Energy Efficiency, Demand Response, California Solar Initiative, Government Relations, and marketing staff to integrate strategies and coordinate outreach efforts. PG&E's 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 (CBOs) and other agencies.

As described above, PG&E believes marketing expenses for the 2009-2011 program cycle can be minimized by integrating with the CARE program outreach efforts. PG&E believes a more aggressive outreach campaign may be necessary in the next phase of the LIEE program initiative, beginning in 2012. PG&E will continue to work with the Energy Division and the Commission in their efforts to develop a statewide tagline for immediate use with its "Energy Savings Assistance 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.

Enrollment

Permit targeted self-certification in certain neighborhoods. (D.08-11-031)

D.08-11-031 permits targeted self-certification and enrollment activities in areas of the IOUs' service territory where 80% of the customers are at or below 200% of the federal poverty line. (D.08-11-031, OP.6) PG&E is ranking ZIP-7 areas by percent of LIEE estimated eligibility. As described above, areas with the highest estimates of LIEE eligibility, correlated with high energy usage, the number of 48-hour shut-off notices sent, actual shut-offs over the last year, and low previous LIEE participation, are evaluated and selected first for Whole Neighborhood events. Many of the areas selected are over 80% LIEE-eligible. These neighborhoods where over 80% of the customers are at or below 200% of the federal poverty level are self-certified.

Assessment/Energy Audit and Measure Installation

Conduct a site-specific energy audit at each residence. Install feasible measures based on housing type and climate zone⁶; increase measure-level cost effectiveness. (D.08-11-031)

PG&E continues to conduct a site-specific energy assessment at each residence and to install all feasible measures based on housing type and climate zone, as authorized in D.08-11-031. Inasmuch as possible, PG&E minimizes the number of visits to a home. During Whole Neighborhood Approach (WNA) events in selected neighborhoods, PG&E ensures that audit and installation personnel will be present in the neighborhood at the same time, minimizing the need for separate trips to enroll participants, assess their homes, and install measures. Appointments are scheduled for any follow-up visits necessary for appliance delivery and specialized installation work which cannot occur at the same time as the energy assessment. However, in all neighborhoods, PG&E continues to do its best to minimize contractor visits and schedule installation as close to the home assessment as possible, at the convenience of the customer.

To help make the neighborhood events a success, PG&E works closely with local government representatives and low income community leaders to coordinate their support and presence for the targeted Whole Neighborhood Approach activities before the neighborhood event is scheduled. PG&E also works with LIHEAP and other local community action agencies to leverage services to all low income neighborhood residents.

1.3.3. Describe how the current program delivery strategy differs from previous years, specifically relating to Identification, Outreach, Enrollment, Assessment, energy Audit/Measure Installation, and Inspections.

PG&E believes the WNA modified the existing LIEE approach rather than constituting a completely new approach to program delivery. There are many elements of WNA that make sense because they work, and PG&E's contractors are already implementing many of these strategies. Many of these were already described in Section 1.3.2, but are discussed below in terms of PG&E's 2010 LIEE activities and WNA experiences.

PG&E actively partners with community agencies and local governments to promote awareness of the LIEE program and services. In 2010, PG&E's promoted the LIEE program at over 180 community events.

Using this information to help determine potential neighborhoods to approach with the LIEE program, PG&E's LIEE program managers work with both internal and external

⁶ To the extent the energy audit also examines a customer's energy usage, this information should not be used to determine which measures are "feasible." Feasibility relates to the topics we discuss in the Section entitled "Segmentation is a Lawful Means of Focusing LIEE Resources," below. (D.08-11-031)

groups to help make each neighborhood event a success that can continue to generate LIEE participation in other neighborhoods in the local community. PG&E is working closely with its LIEE implementation contractors, CARE outreach contractors, PG&E local government relations and communications staff, and state LIHEAP agencies to help establish contact with government representatives and neighborhood leaders.

PG&E provides the following feedback and information on the status of our Whole Neighborhood Approach Implementation strategies and lessons learned from implementing a Whole Neighborhood Approach:

An overview of WNA pilots / projects currently being conducted within the IOU's service territory

PG&E has implemented several projects that are moving the LIEE program to a more fully integrated Whole Neighborhood Approach. Internally, LIEE has been working with the CARE program to integrate LIEE and CARE program information into joint outreach materials, saving both time and money. This strategy includes:

- Coordinating marketing lists and customers enrolled in CARE that are likely to qualify for LIEE;
- Making educational presentations internally and externally;
- Attending common events; and
- Coordinating enrollments in both programs.

Externally, LIEE outreach team members have broadened outreach through relationship building with key community leaders, participation in various events and raising awareness of the program in various communities within PG&E's service area.

- PG&E's staff attended over 180 community events that included job and resource fairs, housing coalition meetings and housing authority meetings.

Successful WNA Strategies

PG&E previously used a coordinated low income neighborhood approach to implement its program in the 1980's and continued this coordination in its 2010 WNA efforts. The most successful strategy that PG&E has realized is treating each WNA partnership as a unique one, rather than developing a one-size-fits-all model. Partnerships between those involved in the Fairfield WNAs were different than those required in the Sacramento WNA.

Targeting the Right Events for WNA Outreach

PG&E's LIEE staff participates in many community events each year. Oftentimes, PG&E's partners in the community select the best event for the partnership. These community groups and/or cities have the most valuable information about where to find eligible customers and how best to speak to them.

However, targeting existing events for increased LIEE staff presence and collaboration efforts has also been problematic as many of these events are in areas with low percentages of income-qualified customers. We are trying to be strategic in how we use our outreach dollars to stretch our limited marketing, education and outreach (ME&O)

budget wisely. Conducting pre-event research and planning has taken much staff time and has not allowed us to move as fast as we would like.

Lessons Learned from PG&E's Previous Neighborhood Approach

The current LIEE program (PG&E's "Energy Partners" program) is derived from the early 1980's "Project Help Program." Project Help utilized CBOs and contractors to install the 'Big Six' energy efficiency measures (caulking, door weather-stripping, duct wrap, attic insulation, water heater blankets and low flow shower heads) using a process that was similar to today's LIEE program. The process began with outreach workers finding and qualifying customers and units. Outreach was followed by the installation crew and later by a third party to conduct inspections. The entire process took less than thirty days and served about 30,000 homes yearly.

Project Help included door-to-door outreach and event-related outreach and also utilized leads from PG&E. The door-to-door approach targeted low income neighborhoods as outreach workers literally walked door-to-door and block-to-block. This approach made sense, as it does today, simply because low income customers live in neighborhoods where they are often located in close proximity to other low income individuals. Given this opportunity, outreach workers usually did not leave the neighborhood until their canvassing was no longer productive. This was an approach very similar to the White Paper's Whole Neighborhood Approach. Most homes were brought into the Project Help program in this manner with estimates ranging from 60-80% of all participants.

LIEE contractors have always used opportunity and event marketing. An opportunity would be as simple as an individual being offered Project Help/LIEE as they signed up for another program in an agency office. Events are much larger venues, a county fair, for example. This event-related effort enrolls individuals directly into the program and starts the required Property Owner Waiver (POW) process. It also helps brand the program, which makes it easier for subsequent door-to-door or other outreach activities. These approaches account for many program leads.

Lastly, the leads could come from PG&E marketing activities, including flyers, bill inserts, and web-based advertising. Interested individuals are directed to call PG&E or another provider's toll-free program line to sign up for the program. Based on PG&E's previous experience, leads or referrals from these sources have usually accounted for about 20% of all participants in these LIEE programs.

Very quickly the 1980's Project Help Program morphed into the Energy Partners program (PG&E's LIEE program) and included private contractors as well as CBOs. Many of these field energy workers have now worked in their assigned service areas for over fifteen years. They adopted the same approaches as the original CBOs, namely the door-to-door neighborhood approach, because it worked. What was true then is true now: the bulk of new jobs come into the program from door-to-door canvassing that has strong whole neighborhood elements. Since many of the Energy Specialists are paid on a piece work basis, their income depends on being as efficient as possible, so they work in an area until they exhaust the supply of jobs and then they move on.

Of course, no one approach is completely and consistently successful. Approaches must be modified from area to area as needed. Significant barriers to higher penetration rates

continue to be a lack of people home during the day, language and immigration concerns for non-native speakers, fear and suspicion of racially-mixed crews, and the misimpression that any printed material is actually an advertisement (“Where’s the catch; you don’t get something for nothing”).

It should be noted that the variety of outreach techniques utilized by LIEE contractors have been very successful. Since 2001, PG&E has met every program production goal set by the Commission and over the last four years has averaged about 62,000 completed units per year.

Today, all of the following neighborhood-based approaches are being used with varying degree of success:

- Door-to-door canvassing by an Energy Specialist within a neighborhood.
 - The simplest, most used and often most productive approach; it is also fairly inexpensive. The Energy Specialist’s canvassing identifies a home where the home and the resident qualify for the program.
 - Usually based on the Energy Partners Online database (EPO)-provided lists of customers, their CARE status, and previous program status. ZIP-7 lists have been provided by PG&E and note areas where most residents will meet the program’s income requirements.
 - The delay between the Energy Specialist outreach and the appearance onsite by the weatherization crew provides time for the required Property Owner Waiver form to be correctly completed and collected.
- Same day neighborhood approach – This is similar to the Commission’s White Paper vision as it tries to deliver services on the same day as the outreach. Collection of the completed Property Owner Waiver (POW) forms can be a problem especially in the case of multifamily units with absentee owners. Advance work and preparation is the key to this approach.
 - Multifamily unit approach – The Energy Specialist gets a master POW signed by the owners or the management company. Flyers and other outreach materials are distributed and promote the upcoming push. On the day of the event, the contractor arrives with multiple Energy Specialists and Weatherization crews. The problem with the “one day fits all approach” is that customers are often not all at home on the chosen day and the contractor must return in order to complete the effort.
 - A variant of this approach is to get the POW and permission from the owners to distribute flyers and door hangers advertising LIEE. The Energy Specialist then finds qualified homes and the installations are handled on an individual basis.
 - Single family/mobile home approach – The contractor promotes the program through telemarketing and groups the appointments into neighborhoods after they receive a signed POW form. The contractor then attempts to provide the education and installation efforts at the customer’s

home in one step. One of PG&E's LIEE contractors has been very successful in making only one visit to the customer (including attic insulation). The few homes requiring follow-up visits were to install specialty glass, mobile home door or an uncommon part of some kind.

- Telemarketing or appointment setting is increasingly being used by the contractors and CBOs to reduce the number actual trips to a neighborhood.
- In 2010, PG&E implemented an event utilizing that approach with the Sacramento Municipal Utility District (SMUD) and Community Resource Project in Sacramento. Planning began in the fall of 2009, with organizations that could sponsor community gatherings informing the customers about LIEE and distributing POW forms. These were used to set up appointments with as many people as possible. This event is described in more detail in Section 1.6.3.

The LIEE program has always utilized a Whole Neighborhood Approach, but not through a single, prescriptive method as outlined in the Commission's White Paper. It has always been cost effective to drive as few miles as possible and to reduce the number of visits to the customer. Thus, while WNA is not a new idea, it remains a good idea. PG&E believes it should be utilized in all its various forms as is needed by individual contractors to outreach and address customers in a given neighborhood or situation. With our LIEE contractors and other energy efficiency partners, PG&E will continue to explore the various facets of WNA to help us enroll 25% of our willing low income customers by the end of 2011.

1.4. LIEE Customer Enrollment Evaluation

- 1.4.1.** Distinguish between customers treated as "go backs" and brand new customers so that the Commission has a clear idea of how many new customers the IOUs are adding to the LIEE program.

In 2010, 6,637 "Go-Back" customers were treated.

- 1.4.2.** Please summarize new efforts to streamline customer enrollment strategies, including efforts to incorporate categorical eligibility and self-certification.

In 2010, PG&E's LIEE contractors streamlined customer enrollment strategies by incorporating categorical eligibility and self-certification into LIEE processes where applicable and working with property agents to get signed POWs for entire multifamily complexes so they can start work on all of them at the same time. These strategies are described in Section 1.3.2 and 1.3.3.

PG&E added the categorical eligibility programs to the LIEE (Energy Partners) enrollment forms for contractors to check off, allowing categorically eligible customers

to skip showing proof of household income. The Commission-approved categorical eligibility programs were also added to the EPO program database.

PG&E continued to encourage contractors to work in the 80% self-certification areas by providing them with breakdowns of estimated eligible customers by ZIP-7 to use in their customer recruitment activities. PG&E discussed targeting strategies at contractor meetings and helped plan enrollment events with contractors and community organizations.

- 1.4.3.** If the IOU has failed to meet its annual goal of number of households served, please provide an explanation of why the goal was not met. Explain the programmatic modifications that will be implemented in order to accomplish future annual goals of number of households served.

PG&E treated 133,329 customer homes in 2010, 106.7% of the goal authorized in D.08-11-031. This allowed PG&E to make up much of the deficit from 2009, attributed to the slow start and ramp-up for the 2009 program, confounded by the delayed modification of the 3-Measure Minimum Rule.

PG&E will accomplish its future annual goals for the number of households served by the end of 2011. The 9,595 homes not served in 2009 were added to PG&E's 2010-2011 goals. PG&E is on target to enroll and treat these customer homes through its increased 2010 outreach and contractor infrastructure. More contractors were brought on for 2010, and more outreach efforts begun in 2009 showed positive results in 2010.

1.5. Disability Enrollment Efforts

- 1.5.1.** Provide a summary of efforts to which the IOU is meeting the 15% penetration goal.

Disabled customers made up approximately 18% of the LIEE enrollees in 2010. Outreach staff was pleased to see these results but also feels more can be done to reach disabled customers. This includes preparation of a direct mail piece to target customers enrolled in PG&E's Medical Baseline program, forming stronger relationships with CBOs serving the disabled community and utilizing market segmentation data.

- 1.5.2.** Describe how the LIEE customer segmentation for ME&O and program delivery takes into account the needs of persons with disabilities.

PG&E is currently completing a Low Income Household Market Segmentation study with SCE that is expected to provide a valuable resource for PG&E to reach its customers with the highest energy burden and energy insecurity. Customer segmentation will include information regarding disabilities and targeting strategies.

LIEE continues to strengthen its relationship with statewide and local organizations. The program will continue to provide literature and information to be included in newsletters and brochures and to create targeted direct mail pieces. LIEE will continue to attend forums, workshops and present at various events and annual meetings.

1.5.3. Identify the various resources the IOUs utilize to target the disabled community and the enrollments as a result:

2010 Disability Enrollments			
Source	Total Enrollments	Disability Enrollments	% of Disability Enrollment
Various contractor recruiting and sign-ups			
Total Enrollment Rate	133,329	23,400	18%

At this time, PG&E has no data-sharing agreements with agencies serving disabled clients. Program staff is currently working with CARE outreach to determine whether community outreach contractors who serve the disabled population may be a good fit to help LIEE. Additionally, conversations began in 2010 regarding the potential of PG&E's Access employee resource group, which assists employees with disabilities, to help market the program to disabled customers. PG&E will continue to explore new partnership opportunities and to seek out new ways to better track its disabled customers.

1.5.4. If participation from the disabled community is below the 15% goal, provide an explanation why:

PG&E's 2010 disabled community participation is above 15%. However, PG&E is concerned that this percentage has been steadily decreasing since the IOUs were prohibited from asking whether a member of the household is disabled. Currently, PG&E contractors list disability status only if directly observable or volunteered (unsolicited) by the customer.

PG&E works with agencies serving disabled clients to encourage their clients to participate in the LIEE program and continues to seek out new partnerships and opportunities. For example, PG&E is currently working with the California Foundation for Independent Living Centers to enroll participants from among their clients, but unless a customer is signed up directly from a sponsored event, PG&E has no way of knowing later that a specific customer is a disabled client. Unlike CARE customers who are able to enroll in CARE by filling out a simple one-page application, most LIEE participants do not enroll at an event, as participating in LIEE requires more significant time and effort commitments from participants who must allow contractors into their homes and provide documentation verifying income. Many customers become aware of the program from a sponsored event or mailing but call back to schedule an appointment later at their convenience, making it difficult to track that they were referred or learned about the program through an agency that works with disabled clients.

1.6. Leveraging Success Evaluation, Including LIHEAP

Decision 08-11-031 defines leveraging as “an IOU’s effort to coordinate its LIEE programs with programs outside the IOU that serve low income customers, including programs offered by the public, private, non-profit or for-profit, local, state, and federal government sectors that result in energy efficiency measure installations in low income households.” Progress will be measured by tracking the following criteria:

- *Dollars saved.* Leveraging efforts are measurable and quantifiable in terms of dollars saved by the IOU (Shared/contributed/ donated resources, elimination of redundant processes, shared/contributed marketing materials, discounts or reductions in the cost of installation, replacement, and repair of measures, among others are just some examples of cost savings to the IOU).
- *Energy savings/benefits.* Leveraging efforts are measurable and quantifiable in terms of home energy benefits/ savings to the eligible households.
- *Enrollment increases.* Leveraging efforts are measurable and quantifiable in terms of program enrollment increases and/or customers served.

1.6.1. Describe the efforts taken to reach out and coordinate the LIEE program with other related low income programs offered outside the IOU that serve low income customers.

In 2010, PG&E worked with other agencies to coordinate the LIEE program with other related programs serving low income customers including SMUD, LIHEAP provider Community Resource Project and the City of Fairfield. These efforts resulted directly in LIEE enrollments. However, most of PG&E’s 2010 efforts to develop partnerships with other agencies and local governments are still in the process of being finalized.

LIEE staff efforts involved much time and many meetings with potential partner agencies and local governments but have resulted in few joint efforts or coordinated outreach. PG&E noted that requests from local governments and other agencies to meet with our staff to discuss possible partnerships have increased with each successfully implemented effort and believes that 2011 has already shown more quantifiable results.

PG&E’s LIEE leveraging efforts are described in Table 14.

1.6.2. In addition to tracking and reporting whether each leveraging effort meets the above criteria in order to measure the level of success, please describe the Other Benefits resulting from this particular partnership not captured under the 3 criteria described above.

See LIEE Table 14.

1.6.3. Please provide a status of the leveraging effort with CSD. What new steps or programs have been implemented for this program year? What was the result in terms of new enrollments?

In 2010, PG&E and the other IOUs met multiple times with California Department of Community Services and Development (CSD) and Commission staff to discuss leveraging and strategies to increase coordination between the LIHEAP and LIEE programs. Topics discussed included data sharing, NGAT/CAS testing, the American Recovery and Reinvestment Act (ARRA) funding restrictions, prevailing wage issues, and ways to work together on homes to increase delivery efficiencies and leverage measure funding.

Stemming from discussions at these meetings with CSD and Commission staff, PG&E implemented a leveraging pilot in Sacramento with Community Resource Project, Inc. (CRP) and SMUD in 2010.

The Sacramento Avenues Weed and Seed Area Project

Free weatherization and energy efficiency services are available to qualifying low income households through a variety of different programs, including the PG&E-ratepayer-funded LIEE program, the SMUD ratepayer-funded Low Income Weatherization program, ARRA-funded Department of Energy Weatherization Assistance Program (DOE WAP), and the tax-dollar-funded LIHEAP.

PG&E, CRP and SMUD each provide free weatherization and energy efficiency services to qualifying low income households through one or more of these programs and developed a project to work together to leverage the resources available to qualifying households in the Sacramento Avenues Weed and Seed Area of ZIP 95824.

Services provided by PG&E, CRP and SMUD to their income-qualifying customers through their respective free weatherization/energy efficiency programs include attic insulation, energy efficient refrigerators, furnace repair and replacement, energy efficient and central room air conditioners, duct sealing, energy efficient lighting, weather stripping, caulking, low-flow showerheads, water heater blankets, and door and building envelope repairs which reduce air infiltration.

Together, PG&E, CRP and SMUD informed, recruited and qualified low income households to receive LIEE and LIHEAP services through the project. All feasible gas and electric measures and services were provided through one of the Project team members (PG&E, CRP and SMUD) and billed back to the appropriate funding source. Program services were provided through PG&E, SMUD, DOE WAP and/or LIHEAP. The end result was a successful one-stop shop to fully weatherize homes with minimal disruption for the participant.

PG&E, CRP and SMUD developed and implemented an outreach and marketing plan to target and notify area residents of the project and to schedule appointments. PG&E, CRP and SMUD worked with the local elementary school, neighborhood community associations and local community leaders to disseminate information and fully engage their participation in the program. Pre-implementation activities included design,

printing and distribution of flyers, a direct mail piece, posters and door-hangers, and presence at local community events. PG&E, CRP and SMUD participated in a kick-off media event during which several pre-selected homes were weatherized.

CRP took the lead to arrange local contacts within the community and the school. SMUD and PG&E designed and printed the material. PG&E paid for the printed material. PG&E, CRP and SMUD distributed all printed materials through their local sources. Materials were co-branded with the logos of each project team member and ARRA. All project team members approved the material before it was distributed.

1.7. Integration Success Evaluation

According to Decision 08-11-031, “Integration constitutes an organization's internal efforts among its various departments and programs to identify, develop, and enact cooperative relationships that increase the effectiveness of customer demand side management programs and resources. Integration should result in more economic efficiency and energy savings than would have occurred in the absence of integration efforts.”

1.7.1. Describe the new efforts in program year to integrate and coordinate the LIEE program with the CARE Program.

In 2010, PG&E coordinated with CARE through marketing, implementation and internal efforts. LIEE program staff worked to update the jointly funded, multi-language “Breathe Easy” brochure to inform customers about the free services PG&E provides, including CARE, LIEE and Energy Efficiency rebate programs.⁷ In addition to developing the “Breathe Easy” brochure, PG&E also coordinated with CARE on direct mail, print advertising campaigns, bilingual bill inserts, presentations and events targeting low income customer segments. PG&E’s LIEE and CARE staff participated together in enrollment events throughout its service area, including Bakersfield, Stockton, San Pablo, Fresno, Sacramento, Selma, Soledad, Richmond, San Rafael, Milpitas, Oakland, Wasco, and Firebaugh.

PG&E’s LIEE and CARE staff continued sharing new participant information. All LIEE customers not already on CARE were automatically enrolled in the program. Sharing

⁷ PG&E’s “Breathe Easy Solutions” brochure is a multi-language brochure describing free services, rates, payment plans and other cost management solutions available to assist residential customers; and includes information on LIEE, CARE, FERA, REACH, HEAP, Medical Baseline, Third-Party Notification, Automatic Payment Service, Balanced Payment Plan, Bill Guaranty, Payment Arrangement, Cooling Centers, Energy Efficiency Rebates, and the SmartAC Program

data in the other direction, PG&E LIEE contractors have access to customer databases that include current CARE status to use in targeting eligible LIEE participants.

1.7.2. Describe the new efforts in program year to integrate and coordinate the LIEE program with the Energy Efficiency Residential Program.

In 2010, PG&E coordinated with Energy Efficiency programs through marketing, implementation and internal efforts. Members of the LIEE team participate on PG&E's internal integration team that meets on a regular basis to coordinate efforts across Energy Efficiency, Demand Response, Distributed Generation, and LIEE programs through integrated marketing and delivery channels. Marketing efforts included updating the multi-language "Breathe Easy" brochure that includes Energy Efficiency rebate information for residential customers, as well as information on free services available to PG&E customers, including CARE, Family Electric Rate Assistance (FERA), Relief for Energy Assistance through Community Help (REACH), Home Energy Assistance Program (HEAP), Medical Baseline, Third-Party Notification, Automatic Payment Service, Balanced Payment Plan, Bill Guaranty, Payment Arrangement, Cooling Centers, and the SmartAC Program.

1.7.3. Describe the new efforts in program year to integrate and coordinate the LIEE program with the Energy Efficiency Government Partnerships Program.

In 2010, PG&E worked with the Government Partnerships program to identify opportunities to leverage their efforts with LIEE's. PG&E will continue to work with new and old government partners to promote channel strategies. PG&E has also been working to set the stage for a coordinated pilot effort that will focus on middle-income level residents. PG&E launched a Middle Income Direct Install (MIDI) pilot program during 2010 through a number of local government partnerships.

1.7.4. Describe the new efforts in program year to integrate and coordinate the LIEE program with any additional Energy Efficiency Programs.

In 2010, PG&E collaborated with Energy Efficiency programs through marketing, implementation and internal coordination efforts. Members of the LIEE team participate in PG&E's internal integration team that meets on a regular basis to coordinate efforts across Energy Efficiency, Demand Response, Distributed Generation, and LIEE programs through integrated marketing and delivery channels. The LIEE team worked closely with the statewide marketing team to ensure coordinated efforts related to statewide branding and web portal.

PG&E staff from multiple programs participated together in integrated program events at which information on many PG&E programs was available.

1.7.5. Describe the new efforts in program year to integrate and coordinate the LIEE program with the Demand Response Programs.

In 2010, PG&E worked with the Demand Response team to include SmartAC in the local roll-outs of LIEE programs. Demand Response staff joined LIEE staff at various events and public forums to encourage LIEE and other customers to sign up for SmartAC in addition to the LIEE program. PG&E’s LIEE team is working with contractors to ensure that SmartAC opportunities are not missed when installing other energy efficiency measures in an LIEE qualified homes.

1.7.6. Describe the new efforts in program year to integrate and coordinate the LIEE program with the California Solar Initiative Programs.

In 2010, PG&E continued to work with Grid Alternatives to integrate and coordinate the single family solar program. Grid Alternatives submitted a list of participating single family solar customer names and addresses to PG&E on a weekly basis. PG&E’s LIEE staff would verify homes eligible for LIEE and refer those homes directly to LIEE program contractors to expedite installation of measures. PG&E’s LIEE staff tracked the progress of LIEE installation work on the solar participant homes and regularly forwarded a list of all completed solar participant homes and measure installations to Grid Alternatives to complete the solar work.

1.8. Workforce Education & Training

1.8.1. Please summarize efforts to improve and expand LIEE workforce education and training. Describe steps taken to hire and train low income workers and how such efforts differ from prior program years.

In 2010, PG&E’s Energy Training Center (ETC) – Stockton provided training for a total of 896 students or 4,784 “student days” in five different sessions (listed below). This represents more than a 45% increase in the number of sessions conducted for LIEE/Energy Partners in 2010. Each of the students attending sessions at the ETC had been hired by a participating contractor prior to attending.

1.8.2. Please list the different types of training conducted and the various recruitment efforts employed to train and hired from the low income energy efficiency workforce.

Type of training or recruitment conducted	2010 Employees trained	2010 Employees hired	2009/2008 Employees trained	2009/2008 Employees hired
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EP Energy Specialists Certification Training	282	282	270/105	270/105
EP Energy Specialists WE&T Training (NEW in 2010)	23	Approx 12	NA/NA	NA/NA
EP Crew Training	272	272	293/112	293/112
EP NGAT Training	197	197	141/77	141/77
EP NGAT Tune Up (not held in 2010)	NA	NA	46/NA	46/46
EP ES Installer (not held in 2010)	NA	NA	29/NA	29/NA
EP Duct Testing & Sealing	23	23	113/47	113/47

1.9. Legislative Lighting Requirements Status

1.9.1. Provide a summary on current and future CFL supply issues, as experienced by the IOU. Any current / future problems as well as potential solutions should be discussed in this paragraph.

CFL availability is still poor in discount, independently owned retailers and small grocery retailers. In 2010, PG&E continued the upstream residential lighting program. Working with over 2,000 retail locations, we have brought down the price of efficient light sources.

1.9.2. Provide a summary explaining how IOU promotes the recycling/ collection rules for CFLs.

PG&E developed a simple, easy-to-understand CFL Recycling fact sheet. This fact sheet is distributed to all LIEE program participants by the LIEE Energy Specialist during the energy education/energy assessment home visit. The fact sheet explains what mercury is and why it is harmful to people and the environment and describes safe removal and storage of CFLs, safe disposal of used CFLs, and what to do when a CFL breaks. Safe CFL recycling practices are also covered during LIEE contractor training modules.

Currently, ENERGY STAR[®] requires manufacturers to print a CFL recycling resource website on CFL packages. Additionally, PG&E encourages lighting manufacturers we work with to also print this same information on the base of the bulb, so it is handy for the customer when they are ready to dispose of the bulb, long after the package is gone. This information is also available on PG&E’s website.

1.9.3. Complete Table 16 (in Appendix). In addition, please briefly summarize the CFL procurement process for the IOU, including manufacturers, distributors, warehousing, and contractor delivery.

Traditionally, the electric IOUs have procured CFLs and other lighting measures independently of each other. For the 2009-2011 LIEE program cycle, the electric IOUs coordinated the procurement of the CFLs in order to obtain the highest quality at the

lowest possible price. Each IOU remained responsible for issuing their own agreement to the successful bidder to authorize the purchase of CFLs.

The successful lighting supplier was selected based on product availability, quality, pricing, experience, warranty, location, and warehousing. The LIEE program agreement requires the supplier to maintain at least a 30-day supply of the product for all service providers and deliver the product to the service provider's facility within 14 days from the order date. In addition, the supplier will include a unique identifier, currently stating "CA LIEE" on the ballast of the CFL.

1.9.4. Provide a summary of IOU activities in preparation for a draw down of CFL-supporting subsidies at the end of the 2009-2011 cycle, and where, as experienced by the IOU, they feel new lighting technologies could be used in the LIEE program

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. Customers with limited income during the drawdown period will continue to 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 require 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. PG&E installed an increasing number of hardwired lighting fixtures through the LIEE program in 2010.

1.10. Studies

- 1.10.1.** For each Study, provide 1) a summary describing the activities undertaken in the study since its inception; 2) the study progress, problems encountered, ideas on solutions; and 3) the activities anticipated in the next quarter and the next year.

Joint Utility⁸ Non-Energy Benefits (NEBs) Study

The Non-Energy Benefits (NEBs) Study was a statewide study managed by San Diego Gas & Electric. The Study was designed to be carried out in two phases. The first phase provided an extensive literature review describing the use of NEBs in the industry. The ranges of relevant values used in other low income energy efficiency programs were summarized, and the consultant recommended an approach for updating NEBs estimates and incorporating them into the required cost-effectiveness tests for the LIEE program. If required, the second phase of the study would have provided updated calculations for estimating the NEBs used in the program.

The activity for this study occurred during 2009 and 2010. In July 2009, following an request for proposal (RFP) process, Skumatz Economic Research Associates (SERA), located in Boulder, Colorado, was selected as the contractor for the project. The Cadmus Group, located in Portland, OR, worked as a subcontractor to SERA. A project kick-off meeting was held in San Diego in August 2009. A subsequent follow-up meeting was held in San Francisco in October 2009, and the project tasks and schedule were finalized later that month. A draft literature review was presented in December 2009.

During 2010, we finalized the Phase 1 deliverable that included the literature review and recommendations for Phase 2. A public workshop was held to present the study results. The results of the study showed that the current NEB values used by the utilities fall within the range of values reported from other low income and energy efficiency programs. There were a few exceptions where the values currently used by the California utilities were under or over the reported range. Initially, a phase two study had been planned to conduct further analyses of specified NEBs based on recommendations from this study; however, the statewide advisory group determined that further analysis was not required. The results of the “phase one” study showed that values were for the most part consistent with other low income energy efficiency programs, and minor updates could be performed by the IOUs with data on hand.

Joint Utility 2009 LIEE Process Evaluation

The prime research contractor for the process evaluation is Research Into Action. In conjunction with the IOU's, Energy Division staff selected the contractor and managed

⁸ The Joint Utilities are PG&E, Southern California Edison Company (SCE), Southern California Gas Company (SCG), and San Diego Gas and Electric Company (SDG&E).

the study. PG&E holds the contract with the contractor for the project. The statewide process evaluation commenced with a kickoff meeting for all interested parties in August 2010.

The Process Evaluation assessed the effectiveness of the current (2009-2011) LIEE program and developed recommendations for program design and delivery that will improve the effectiveness of the program. The primary deliverable is a final report that will present the findings and recommendations for possible program changes; however, the Joint Utilities are also seeking usable information and recommendations as the evaluation progresses, so that LIEE program managers can get timely feedback.

The 2009-2011 LIEE program includes several new components, such as the Whole Neighborhood Approach and a statewide awareness campaign. The 2009 Process Evaluation gives the Joint Utilities and the Commission the first opportunity to understand how these new approaches are impacting key Commission and utility program objectives, so that program elements can be fine-tuned to increase program participation and effectiveness.

A new process for obtaining bids from contractors for this evaluation was introduced in 2009. As such, a Request for Qualifications was posted during the first quarter of 2010. The Request for Proposals was disseminated to qualified bidders in the first quarter 2010. We selected a contractor, Research Into Action and began work on this evaluation during the third quarter 2010. A Draft Report was completed in February 2011. A public workshop to discuss Study results was held on March 28, 2010, in San Francisco. The results from this study will be used to develop the 2012-2014 Energy Savings Assistance Program Application.

Key preliminary findings and recommendations presented in the report included:

- Increase efforts to better educate customers;
- Simplify and streamline the enrollment processes – for both customers and contractors;
- Continue to use multiple methods of outreach and marketing for different purposes and different markets;
- Focus some attention on reaching and enrolling customers for whom the common outreach methods may be less effective;
- Find other ways to help customers without heat and hot water who do not qualify for program intervention;
- Increase outreach with new cell phone protocols and customer testimonials; and
- Develop new marketing messages and contractor training to work with renters and landlords.

Joint Utility 2009 LIEE Impact Evaluation

The Impact Evaluation is a statewide study managed and directed by Energy Division. Southern California Edison (SCE) holds the contract for the project. The objective of the Impact Evaluation research is to provide electric and gas savings estimates by measure,

utility, household, weather zone, and other relevant dimensions for the 2009 LIEE Program. The results will provide data to quantify the 2009 program achievements and document the relative value of various measures in producing energy savings. Analyses of the program impacts on energy savings will be used to update savings forecasts, complete other LIEE analyses, and meet filing and reporting requirements (including our 2012-2014 Energy Savings Assistance Program Application).

The following activities have taken place in 2009 and 2010: a Request for Proposals was written and approved by the participating utilities and Energy Division in June 2009; the RFP was distributed in July 2009; and ECONorthwest was selected as the contractor for the project in August 2009. The firm is working with several sub-contractors, one of which includes the contractor that conducted the 2005 LIEE Impact Evaluation. The project kick-off meeting was held in September 2009. The research plan was presented at an initial public workshop held in November 2009. The utilities provided customer data to the contractor in December 2009 and January 2010. A sample plan was finalized for the survey data collection effort (one component of the project) in January 2010. During 2010, the participant survey instrument was developed, and survey data was collected for LIEE participants and non-participants, on-site audits were conducted, and the billing analyses were completed. The engineering analyses of selected measures and additional billing analyses on all of the measures were conducted. The draft report on the project was completed in March 2011, and a public workshop was held on March 28, 2011, to discuss evaluation results. The draft impact results are being used in the 2012-2014 Energy Savings Assistance Program Application.

The results are intended to document the relative value of various measures in producing energy savings. Analyses of the program impacts on energy savings are being used to update savings forecasts, complete other program analyses, and meet filing and reporting requirements. The impact evaluation conducted during this program cycle focused additional resources on understanding behavioral and/or housing-related variables relevant to heating and cooling impacts. In particular, more in-depth data were collected and further analyses were conducted on furnaces and evaporative coolers.

The primary analyses of the data were done via utility billing data. Additional primary data collection included phone surveys with participants and non-participants, as well as in-home audits and interviews with a smaller sample of participants. Engineering analyses of some small and new measures were also conducted. In the end, while the study made use of extensive data collection via phone surveys and on-site audits, the evaluators concluded that the additional data was not as useful as they had hoped and the primary tool of analysis was still a billing regression model.

Overall, preliminary findings from the study found that in general the impacts for the 2009 program were lower than the 2005 program (the year the last impact evaluation was conducted). As was the case in 2005, refrigerators and lighting still account for most of the program savings. In addition, the study revealed that evaporative coolers exhibited significant program savings and demonstrated nearly two times the savings estimates provided in the 2005 evaluation. According to the study, other factors influencing lower energy savings included the fact that many customers are not using their poorly functioning units very much prior to program intervention. As a result, when a new unit

is installed and customers begin to use it more, the associated usage for that measure increases, thus reducing the overall impacts.

Joint Electric Utility⁹ Refrigerator Degradation Study

Typically, appliance replacement is based on the effective useful life (EUL) and degradation of measures, from which is determined at what stage of their lifecycle it becomes cost-effective to replace them to receive the most energy savings benefits. Currently, old refrigerators are eligible for replacement with new energy efficient refrigerators in the LIEE program if they are manufactured before 1993. LIEE program statistics indicate that the pre-1993 refrigerator replacement market is already saturated; however, the Joint Utilities believe energy efficient refrigerators are still one of the most cost-effective, energy-saving measures in the LIEE program. This study will update refrigerator replacement criteria to garner new, significant and cost-effective energy savings for the LIEE program.

The central goal of the refrigerator degradation study is to determine which, if any, alternate refrigerator replacement criteria lead to maximum, cost-effective energy and demand savings for the LIEE program. Specifically, the Joint Utilities are looking for a criterion for refrigerator replacement in the form of either a date at which manufacturer and technological changes in efficiency occurred or a determined age of refrigerators to be replaced.

KEMA is conducting the research under contract to PG&E, and PG&E will manage the study. The study will be completed in 2011. Preliminary results show that early replacement of refrigerators manufactured after 1993 may be a cost-effective source of energy and demand savings to include in the 2012-2014 Energy Savings Assistance Program portfolio. The study is not yet finalized; however, the Phase 1 results summarizing energy savings potential for 1993-2000 replacement refrigerators has been completed and is being used by the utilities to recommend new refrigerator replacement criteria for the 2012-2014 Energy Savings Assistance Program

PG&E/SCE LI Market Segmentation Study

The Customer Segmentation Study is a joint study between PG&E and SCE. The results of this study will assist program managers in developing more effective or streamlined targeting and outreach methods. In addition, it is intended to gather information to enable program managers to improve program delivery and/or marketing and educational materials insofar as they are tailored to the needs and issues of various groups (segments) of customers.

The following program activities took place during 2009-2010: A request for proposal with a project scope and project objectives was written and approved by the two participating utilities and the Energy Division staff. The RFP was distributed to potential bidders in June 2009. Proposals were reviewed and scored by the study team. HINER

⁹ The Joint Electric Utilities are: PG&E, Southern California Edison Company (SCE), and San Diego Gas and Electric Company (SDG&E).

and Partners was selected as the Evaluation Contractor for the project in July 2009. A project kick-off meeting was conducted in September 2009. A draft research plan was created and modified based on feedback from the team. A revised research plan was presented at a public workshop in November 2009. The project included multiple phases of data collection, which began with analyses of customer usage and billing data, and initial focus groups. This was followed by a phone survey and followed up with another group of focus groups. All of these data were used to build the segments with an approach that can relate back to utility customer data identifiers for the segments.

While the study is jointly funded, the research contractor executed parallel projects for the two utilities because the primary utility databases are not the same. Specific project activities during 2010 focused on SCE data collection and analyses. Particular attention was paid to examining differences in customer needs based on variables such as high usage, disability, energy burden, bill payment issues and other data-base driven variables that may be relevant to improving program outreach and targeting practices. The phone survey data and focus group data were then used to further understand and build on the understanding of these segments.

During 2011, we anticipate gathering additional primary data via qualitative and quantitative methods of data collection. These data will be analyzed in conjunction with the analyses of the existing utility customer data in providing details on customer segments.

Ongoing efforts have been made, and will continue to be made, to coordinate the planning and execution of this study with what has been done via the Statewide ME&O Segmentation Study. In particular, the results, data, and instruments have been reviewed by the LIEE project team in order to both capitalize on what has been done, as well as to insure that these efforts can appropriately inform one another. While the results are preliminary and the tool has not been “tested”, PG&E anticipates that the resulting segmentation tool will allow us to better identify and target geographic areas with high concentrations of “high priority” segments. Moreover, contractors may be able to apply customized (targeted) outreach and marketing strategies based on the profiles of the regions they are serving. Preliminary findings are being incorporated in to PG&E’s 2012-2014 Energy Savings Assistance Program Application, and PG&E anticipates that once the final results of this study are available and the targeting tool is operational, these results will continue to inform and improve our program delivery efforts throughout the 2012-2014 program cycle.

- 1.10.2.** If applicable, submit Final Study Report describing: 1) Overview of study; 2) Budget spent vs. authorized budget; 3) Final results of study; and 4) Recommendations.

No studies were completed in 2010.

1.11. Pilots

- 1.11.1.** For each Pilot, provide 1) a summary describing the activities undertaken in the study since its inception; 2) the study progress, problems encountered, ideas on solutions; 3) the activities anticipated in the next quarter and the next year; and 4) Status of Pilot Evaluation Plan (PEP).

Microwaves

While researching new LIEE measures to include in its 2009-2011 LIEE Program Application, PG&E looked at microwave ovens which are already offered through other low income energy programs. Microwave ovens use approximately 50% less energy than conventional ovens and can provide both electric and gas savings depending on the type of oven or stovetop that is being displaced. In addition to saving energy, microwave ovens generally cook food much faster. Because they don't generate as much heat in your kitchen, microwaves may also save on air conditioning costs during the summer. Microwaves are especially good for small portions and leftovers. Microwave ovens are not well suited for cooking large-sized portions, and full-size ovens don't efficiently cook small quantities of food.

Microwave ovens impact both total energy use and demand. The KEMA Low Income Needs Assessment report indicated 96% of low income homes have a microwave oven.¹⁰ As many as 9.3% of very low income families do not have microwave ovens, according to the 2004 CA Statewide Residential Appliance Saturation Survey (RASS).

Initially the objective of this pilot was to partner with the Meals on Wheels Program in local communities to provide energy saving microwave ovens to customers who do not have one. Meals on Wheels is a community-based program through which local volunteers deliver meals to homebound seniors.

As PG&E's LIEE program staff researched this opportunity, we found that there were significant barriers for Meals on Wheels volunteers to deliver and install the microwave ovens in customers (seniors and disabled) homes that are enrolled in the Meals on Wheels program. PG&E discovered two major barriers to the originally proposed Meals on Wheels delivery. First, Meals on Wheels clients are not income-qualified. PG&E's original proposal was predicated on the belief that Meals on Wheels clients, in addition to being homebound seniors and disabled persons, were low income customers. Although many of them are low income, income is not a criteria for participation in Meals on Wheels.

The second major barrier is the equipment and outlet feasibility checks that would need to be performed by the Meals on Wheels volunteers. The volunteer would have to ensure

¹⁰ Table 4-47, p. 4-49. KEMA, Phase 2 Low Income Needs Assessment. Final Report to the CA Public Utilities Commission, September 7, 2007.

that the outlet was grounded prior to installing the microwave, as PG&E will not install any appliance (including microwaves) in ungrounded outlets. This extra step would require the volunteer to physically reach the outlet behind the microwave and test it with a grounding device.

Meals on Wheels volunteers are not trained to check outlets and this work is outside of their normal scope and creates additional work and liabilities for them. The additional grounding check also creates an additional visit to the customer's home. Currently, the volunteer carries the microwave into the customer's home, plugs it in and shows them how to use it. In addition to the added grounding check step, the volunteer would also need to check the customer's oven to ensure it was working properly and was served by PG&E's fuel commodity. Making volunteers responsible for performing these extra tasks was a significant barrier to participation for Meals on Wheels, which remains interested in working with PG&E on other projects and activities within their usual scope of work.

As specified in PG&E's LIEE 2009-2011 Application, our goal for this pilot was to install up to 3,750 microwave oven units throughout PG&E's service territory in program years 2009-2011. PG&E came to the conclusion that the microwave pilot project as proposed is not the most feasible or effective way to deliver the microwave ovens. The Meals on Wheels organizations PG&E contacted thought they could deliver 5-10 microwaves each, and estimated up to a maximum of 25 microwaves per year. They noted that most of their clients currently have microwaves, which is in line with KEMA Needs Assessment estimates that 96% of low income households already have a microwave. However, because of the high potential savings from microwaves, PG&E continues to believe that they present a cost-effective opportunity under a different delivery strategy to provide them to the 4% of homes that need them.

Following its additional research of microwave delivery options, PG&E modified its pilot implementation plan with the Commission to propose that microwave identification and delivery occur as part of PG&E's LIEE Energy Partners Program. Participant homes needing microwaves could be easily identified by PG&E's energy specialists while they are doing their initial home energy assessment. Additionally, the Meals on Wheels organizations will continue to let PG&E know about any of their clients that qualify to receive a microwave oven through LIEE.

The expected outcome of the pilot will reduce energy use in customers' homes, which will result in lower energy bills and less demand on the grid. Microwaves were a new measure to the LIEE program in 2009 and implementation began in the fourth quarter of 2009 following approval of PG&E pilot Advice Letter. PG&E identified and installed 117 microwaves in 2009 and 3,055 in 2010.

The Microwave Pilot was completed in 2010, and is being evaluated by ECONorthwest in 2011.

High Efficiency Clothes Washers

In its 2009-2011 LIEE Program Application, PG&E proposed the High Efficiency Clothes Washer Measure Pilot to explore the feasibility of adding high efficiency clothes

washers into the LIEE program on a small scale, with the intention of expanding the measure to the entire utility.

The goal of this pilot was to replace up to 1,000 standard clothes washers with new high efficiency clothes washers in 2009. Implementation began in the fourth quarter of 2009 following approval of PG&E's pilot advice letter. PG&E installed 27 clothes washers in 2009 and 902 in 2010.

PG&E planned to provide replacement clothes washers only in qualified low income homes within the greater Bay Area region. This would allow us to have a large pool of customers in a relatively small, controlled geographical area; but due to the late start in 2009, PG&E decided to expand the pilot implementation to its entire service area.

Customers eligible to participate in the pilot had to be enrolled in the LIEE program, have five or more people living at the residence, and have a non-landlord owned standard, non-energy efficient clothes washer that was at least seven years old.

PG&E used its existing refrigerator delivery contractors to market and assess LIEE customers for participation in this pilot program. The refrigerator contractor assessed the home for a washer installation at the time of the refrigerator delivery. If the customer qualified for a washer replacement, the refrigerator delivery contractor installed one at this time. The delivery contractor was also responsible for disposing of and recycling (de-manufacture) the original, replaced clothes washers in an environmentally safe manner and in accordance with federal, state, and local regulations and codes.

Because PG&E did not begin pilot implementation until the end of 2009, the efficacy and feasibility of high efficiency clothes washer replacements were not able to be adequately assessed in 2009. PG&E installed 27 clothes washers during 2009 and 902 in 2010. PG&E began an evaluation of the pilot in 2011 and hired ECONorthwest to design and conduct appropriate data collection activities.

City of San Joaquin (Fresno County)

A 2009-2011 Pilot Project was proposed by the Energy Coalition with the City of San Joaquin. The Pilot Project was designed to target the hardest-to-reach low income residential market sector to identify new and creative strategies for successfully engaging these customers in a replicable and sustained manner.

San Joaquin is a small, closely knit, rural community. The majority of its 4,000 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 to the adoption of the energy ethic the utilities and Commission seek to create.

The goal of the Pilot 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 and developing innovative outreach methods for community engagement. This would result in increased participation, energy education and awareness, municipal leadership and energy savings

that can be replicated in similar California communities. The Pilot Project is a comprehensive, integrated approach to local government empowerment and leadership. Through a joint filing with PG&E's Energy Efficiency Local Government Partnership department, the Pilot Project is an integral component of the San Joaquin Energy Watch Partnership Program (the Partnership Program). This whole-city approach will allow the entire community to be brought into the campaign. To effectively build municipal leadership, the Partnership Project will focus on municipal facility energy retrofits and outreach services to members of the community that do not qualify under the Pilot Project.

This Pilot Project did not begin implementation until 2011. 2009-2010 efforts focused more on the non-low income components of the San Joaquin Energy Watch Partnership Pilot. Planning discussions between PG&E, the City, and the Energy Coalition have largely focused on value-adds the City is in a unique position to create and contribute to, and the focus of this pilot in 2011 will be the successful integration of PG&E's existing LIEE program contractors with the City's local marketing efforts. This includes developing additional program collateral and strategies that would most effectively communicate the many benefits of participation in the pilot program to Spanish speaking residents of the city and PG&E customers beyond the city limits. Discussions and follow-up have also allowed PG&E to establish that the city is estimated at over 80% eligible for the LIEE program and therefore the entire population qualifies for self-certification.

The Pilot Project team will evaluate the program's success at the conclusion of the pilot.

On-Line LIEE/Energy Savings Assistance

PG&E requested \$150,000 for this on-line training pilot, to be conducted during the 2009-2011 program cycle. In D.08-11-031, the Commission authorized \$150,000 for each year, for a total of \$450,000. PG&E will spend up to \$150,000 total on this study, as requested in its application and subsequent expanded Pilot Implementation Plan filing. This pilot began in 2010 and will be completed in 2011 or 2012. When the new Insulation Standards are published in 2011 or 2012, the pilot contractor (Saturn Resource Management) will, after a contract change order, incorporate those modifications into the training.

The goal of this pilot is to explore what LIEE training currently conducted on-site at the PG&E Energy Training Center (ETC) in Stockton California can be moved to a web-based and/or off-site curriculum without decreasing effectiveness or results.

In support of the 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 project was integrated into the current LIEE PG&E Energy Partners Program Weatherization Specialists Certification Training during 2010. Final evaluation of results will be available in 2011. 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 Weatherization Specialist. The ETC will continue to be the source for on-site laboratory, workshop, and materials-driven LIEE training.

The intent is to simultaneously run the on-line pilot (beta version) and the current five-day Weatherization Specialist training. Students enrolled in a class with the on-line element will also attend appropriate sessions at the ETC 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 in the field. Impacts and effectiveness of the pilot training on an individual basis will not be assessed until a student has completed both the ETC and on-line portions of training.

On-line students will be given a finite amount of time with a pre-test limited to 20 minutes. The exit exam is the same material. The Pilot hopes to determine, by comparing pre-test and post-test scores and new WS field performance, where topics can be improved. Quizzes will be topic specific. The final exam or exams will be based on the quizzes. Different methods of proctoring final exam or exams will be explored to ensure accuracy and student compliance.

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

The pilot was awarded in late 2010. Four firms were invited to respond to the request for bid. The on-line training pilot will be implemented in the second quarter of 2011, and results will be evaluated in 2011 or early 2012 depending upon the number of students. Three LIEE contractors who will be hiring additional WS's in 2011 have agreed to assist in the pilot.

- 1.11.2.** If applicable, submit Final Pilot Report describing: 1) Overview of pilot; 2) Description of Pilot Evaluation Plan (PEP); 3) Budget spent vs. authorized budget; 4) Final results of pilot (including effectiveness of the program, increased customer enrollments or enhanced program energy savings); and 5) Recommendations.

No studies were completed in 2010.

1.12. "Add Back" Measures

For measures that fall below the cost effectiveness threshold under Decision 08-11-031, we require additional reporting to show the cost, energy savings impacts, and related metrics.

- 1.12.1.** If the "add-backs" compromise the IOUs' ability to meet the 2020 Plan goal that 100% of eligible and willing customers will have received all cost effective LIEE measures, how does the IOU propose to address the shortfall in other parts of the LIEE program?

See Table 18. The add-back measure expenditures (\$5,246,104) comprised 4.1% of PG&E's total \$126,858,700 LIEE measure expenditure in 2010. At this time, it is too early to address whether or how add-back measures may compromise our ability to meet the 2020 Plan goals.

CARE Program

2. CARE Executive Summary

The California Alternate Rates for Energy (CARE) program provides a monthly discount on energy bills for income-qualified residential single-family households, tenants of sub-metered residential facilities, nonprofit group living facilities, agricultural employee housing facilities and migrant farm worker housing centers throughout PG&E's service area.

The CARE program was originally referred to as the Low Income Rate Assistance (LIRA) Program, as authorized in D.89-07-062 and D.89-09-044 by the California Public Utilities Commission (CPUC) on November 1, 1989, to provide a 15 percent discount on energy rates to residential households with income at or below 150 percent of the Federal Poverty Guidelines. The program name was later changed from LIRA to CARE as authorized in D.92-04-024.

In D.01-06-010 and D.02-01-040, the CPUC authorized an increase in CARE eligibility from 150 percent to 175 percent of Federal Poverty Guidelines and the rate discount from 15 percent to 20 percent. The CARE eligibility level was later increased to 200 percent of Federal Poverty Guidelines in D.05-10-044.

In D.08-11-031, the CPUC approved the CARE program for Program Years (PY) 2009-2011.

2.1. Participant Information

2.1.1. Provide the total number of residential CARE customers, including sub-metered tenants, by month, by energy source, for the reporting period and explain any variances of 5% or more in the number of participants.

See CARE-Table 8.

During the 2010 program year, no monthly variances of 5 percent or more occurred.

2.1.2. Describe the methodology, sources of data, and key computations used to estimate the utility's CARE penetration rates by energy source.

PG&E and the other California investor-owned utilities (IOUs) used the joint utility methodology adopted by the Commission in D.01-03-028 for developing quarterly and monthly penetration estimates in 2010. This method entails annual estimation of eligibility for CARE, Low Income Energy Efficiency (LIEE), and other income-by-household size parameters in a small area (block group, census tract, zip+2, etc.) for each IOU's territory and for the state as a whole.

Sources for this estimation include the Commission's current guidelines, current year small area vendor marginal distributions on household characteristics,

Census PUMS 2000 and PUMS 2005-2009 sample data, utility meter and master meter household counts, Department of Finance Consumer Price Index (CPI) series, and various Geographic Information System (GIS) sources.

Estimates from the block group level are aggregated to the county/utility and whole utility level, among other aggregations. Each quarter, the utility applies county/utility level eligibility fractions to a new set of "technical eligibility counts" (for CARE, these are metered and sub-metered occupied housing units) obtaining an estimate of income/demographic eligibility in household count form.

Every month, including each quarter, the utility counts the number of households (by small area, by county, and overall) that are enrolled in CARE. The CARE household total, including individually metered and sub-metered occupied housing units, is divided by the total income/demographic eligibility.

In November 2007, Athens Research made a refinement to the joint utility method. This method uses available (and legitimately obtainable) Census data (Advance Query, PUMS, and SF3) tabulations to produce block group level estimates of eligibility at 200 percent of Federal Poverty Guidelines among individual metered, sub-metered, and non-sub-metered master metered households. These estimates may be aggregated in various ways to provide current year estimates of eligibility by "payer status," i.e., individually metered, sub-metered, and non-sub-metered.

In 2009, the method was augmented to better incorporate the impact of labor force changes (unemployment and other forms of job separation, as well as positive changes that are expected to occur in California subsequent to the recession). The method adjusted block group marginal distributions on household income based on sub-state modeling that incorporated Current Population Survey, Integrated Public Use Microdata Survey data, American Community Survey Data, and California Employment Development Department county and MSA level labor force series. This adjustment to block group income marginal is then incorporated into the otherwise "standard" estimation approach to produce small area estimates reflecting small area income changes due to labor market forces.

The most recent estimates of eligibility by payer status, from December 2009, are used to disaggregate the overall CARE eligibility rate that has been estimated historically, yielding CARE eligibility and penetration estimates that differ between individual and sub-metered households (and which are consistent with the overall estimate).

2.1.2.1. Describe how the estimates of current demographic CARE-eligibility rates, by energy source for the pre-June 1st periods, were derived.

The joint utility methodology, as described above, was used throughout 2010.

- 2.1.2.2.** Describe how the estimates of current CARE-eligible meters were derived. Explain how total residential meters were adjusted to reflect CARE-eligible meters (i.e., master meters that are not sub-metered or other residential meter configurations that do not provide residential service.).

CARE eligibility rates by small and large areas are developed so that they apply to individual residential meters and sub-metered dwelling units only. Non-sub-metered master meters and other meters that do not provide residential service are not included in the “technical eligibility” meter counts.

- 2.1.2.3.** Discuss how the estimates of current CARE-eligible households were developed.

See PG&E’s response above to Section 2.1.2. Note that the methodology is based on estimating small area (block group) level household size, by income and householder-age tabulations for the current year and connecting these estimates with small area counts of households that are individually metered or sub-metered. Block group/utility-specific estimates are then disaggregated/aggregated to various geographic levels within a given utility area: zip+2, zip, tract, county, territory, etc. Statewide estimates, regardless of utility boundaries, are also provided at small and large area levels.

- 2.1.2.4.** Describe how current CARE customers were counted.

PG&E runs a monthly report of the billing system for all accounts currently enrolled in CARE. This monthly report includes all CARE customer information necessary for reporting, including energy source information (electric, gas, or both) and CARE enrollment and recertification dates.

In the case of sub-metered tenants receiving CARE discounts from their master-metered facilities, PG&E runs a separate monthly report to count the number of sub-metered dwelling units that are flagged as being enrolled in CARE.

- 2.1.2.5.** Discuss how the elements above were used to derive the utility’s CARE participation rates by energy source.

The participation rate by energy source is the total number of participating CARE customers by energy source divided by the estimated eligible CARE population by energy source.

- 2.1.3.** Provide the estimates of current demographic CARE-eligibility rates by energy source at year-end.

Electric-only estimated eligible:	456,964
Gas-only estimated eligible:	278,895
Combined electric/gas estimated eligible:	883,997
Total CARE eligibility:	1,619,856

CARE eligibility estimates are based on 200 percent of the Federal Poverty Guidelines.

2.1.4. Provide the estimates of current CARE-eligible sub-metered tenants of master-meter customers by energy source at year-end.

47,200 electric and 34,290 gas sub-metered tenants are estimated to be eligible for CARE at year-end.

2.1.5. Provide the current CARE sub-metered tenant counts by energy source at year-end.

30,811 electric and 27,283 gas sub-metered tenants were enrolled in CARE at year-end.

2.1.6. Provide the current CARE sub-metered penetration rates by energy source at year-end.

As of year-end 2010, 65 percent of the estimated CARE-eligible sub-metered electric tenants and 80 percent of the estimated CARE-eligible sub-metered gas tenants were enrolled in CARE.

2.1.7. Discuss any problems encountered during the reporting period administering the CARE program for sub-metered tenants and/or master-meter customers.

To make the CARE program available to eligible tenants of sub-metered residential facilities, PG&E mailed information packages containing program applications and posters to landlords/managers in January. However, many of these packages were either returned or undelivered due to high turn over of landlords/managers, which resulted in lower new enrollments than expected.

Some landlords/managers were concerned that their tenants who enrolled in the CARE program used more energy than the average tenant in the facility. This resulted in the master-metered customer having to pass on more of a discount than they received from PG&E. In these cases, PG&E explained to the landlord/manager how the sub-metered discount works. If the landlords/managers were not satisfied, PG&E advised the landlords/managers to contact the CPUC.

Another problematic issue was the insufficient discount information on tenant bill from the facility billing agency. For example, the CARE discount might not be shown as a

separate line item, making it difficult for the tenant to verify whether they were receiving the discount. When a tenant called PG&E with questions, PG&E confirmed that the tenant was certified for the program and reviewed the bill with the tenant to ensure they were receiving the discount. If it appeared the tenant is not receiving the CARE discount, the tenant was advised to contact their manager or billing agency for further clarification. California Civil Code Section 798.43.1(c) required that: “the management shall notice the discount on the billing statement of any homeowner or resident who has qualified for the CARE rate schedule as either the itemized amount of the discount or a notation on the statement that the homeowner or resident is receiving the CARE discount on the electric bill, the gas bill, or both the electric and gas bills.”

If the tenant did not find resolution with their billing agency and/or sub-metered facility manager, PG&E advised the tenant to contact their County’s Department of Weights and Measures (DWM). DWM could help tenants with meter reading accuracy/testing, proper meter installation, billing accuracy, and verification of correct rate. If contacting the DWM did not resolve the tenant’s billing question, the tenant was advised to file a complaint with the CPUC.

PG&E provided a CARE certification report to landlords/managers at regular intervals. PG&E also requested landlords/managers to contact PG&E when information needed to be updated. Nonetheless, some landlords/managers still failed to notify PG&E when a CARE-certified tenant moved out of the facility.

During the economic downturn, PG&E noticed an increase in turnovers within Mobile Home Park ownership and management. When change of ownership happened, PG&E worked with new owners to transfer existing CARE-certified tenant data to new accounts and informed them about the CARE program and the processes involved. When landlords changed managers, they often failed to notify PG&E with new contact information, which resulted in undelivered reports and delayed communication.

2.2. CARE Program Summary

2.2.1. Please provide CARE program summary costs.

CARE Budget Categories	Authorized Budget	Actual Expenses	% of Budget Spent
Outreach	\$5,700,000	\$5,593,331	98%
Automatic Enrollment	\$150,000	\$0	0%
Proc., Certification and Verification	\$1,900,000	\$1,488,218	78%
Information Tech./Programming	\$150,000	\$166,002	111%
Pilots	\$75,000	\$58,513	78%
Measurement and Evaluation	\$0	\$0	0%
Regulatory Compliance	\$110,000	\$100,087	91%
General Administration	\$525,000	\$319,393	61%
CPUC Energy Division Staff	\$206,000	\$101,560	49%
Cooling Centers	\$400,000	\$143,041	36%
Total Expenses	\$9,216,000	\$7,970,145	86%
Subsidies and Benefits	\$470,115,337	\$724,661,810	154%
Total Program Costs and Discounts	\$479,331,337	\$732,631,955	153%

2.2.2. Please provide the CARE program penetration rate to date

CARE Penetration

Participants Enrolled	Eligible Participants	Penetration rate	Target Met?
1,499,942	1,619,856	92.6%	Yes

2.2.3. Report the number of customer complaints received (formal or informal, however and wherever received) about their CARE recertification efforts, and the nature of the complaints.

CARE Recertification

Month	Complaints Received	Nature of Complaint	Cases Resolved
January	0	n/a	n/a
February	0	n/a	n/a
March	0	n/a	n/a
April	0	n/a	n/a
May	0	n/a	n/a
June	0	n/a	n/a

July	0	n/a	n/a
August	0	n/a	n/a
September	0	n/a	n/a
October	0	n/a	n/a
November	0	n/a	n/a
December	0	n/a	n/a

2.3. CARE Program Costs

2.3.1. Discount Cost

2.3.1.1. State the average monthly CARE discount received, in dollars, per CARE customer by energy source.

Electric: \$42.94

Gas: \$7.42

2.3.1.2. State the annual subsidy (discount) for all CARE customers by energy source.

Electric: \$627,048,344

Gas: \$97,613,466

Total: \$724,661,810

2.3.2. Administrative Cost

2.3.2.1. Show the CARE Residential Program's administrative cost by category.

See CARE-Table 1, Overall Program Expenses.

2.3.2.2. Explain what is included in each administrative cost category.

Outreach: This category includes bill inserts, applications (printing and mailing), posters, brochures, postage, sub-metered outreach, information technology (technical support and software licensing), staff labor, outbound and inbound automated phone enrollment, toll-free line, event staffing, website design, capitation fees, mass media and other outreach.

Automatic Enrollment: This category includes staff labor and information technology for automatically enrolling customers from other agencies or utilities.

Processing, Certification and Verification: This category includes staff labor for application processing, and training.

Information Technology/Programming: This category includes manual rebilling, programming and billing labor.

Pilots: This category includes any pilot projects for the program. Recertification and Post Enrollment Verification Non-Response Study was the only approved pilot program in 2010.

Measurement & Evaluation: This category includes all Measurement and Evaluation costs such as contract expenses for studies such as annual CARE eligibility estimates, and contractor for data support.

Regulatory Compliance: This category includes program applications and advice filings, comments and reply comments, hearings, reports and studies, working group meetings, public input meetings, and tariff revisions.

General Administration: This category includes office supplies, market research, program management labor and information technology (technical support and software licensing).

CPUC Energy Division Staff: This category includes funding for the Energy Division staff.

Cooling Centers: This category includes outreach, direct funding and general administration of the Cooling Centers Program.

2.3.3. Provide the year-end December 31 balance for the CARE balancing account.

The year-end December 31, 2010 balance for the CARE balancing account (electric and gas) was under collected and reflected a year-end debit balance of \$135,957,386.

2.3.4. Describe which cost categories are recorded to the CARE balancing account and which are included in base rates.

D.02-09-021 authorized the recording of all CARE administrative costs as well as the revenue shortfall associated with the CARE discount in the CARE balancing account.

2.3.5. Provide a table showing, by customer class, the CARE surcharge paid, the average bill paid, the percentage of CARE surcharge paid relative to the average bill, the total CARE surcharge collected, and the percentage of total CARE revenues paid.

See CARE-Table 10.

2.4. Outreach

2.4.1. Discuss utility outreach activities and those undertaken by third parties on the utility's behalf.

With a high unemployment rate in 2010, Californians were in dire need of financial relief and services. During these difficult economic times, PG&E not only reached out to the eligible income-qualified population, but also embraced the challenges by increasing the level of CARE outreach to the newly unemployed in PG&E's service area.

PG&E defined its CARE-eligible households so that it could develop a targeted marketing and outreach plan for the following demographic groups:

- CARE-eligible households are predominantly ethnic minorities. These include a mix of seniors, rural residents, agricultural farm workers and tenants of sub-metered residential facilities. The majority of all eligible customers speak one of five languages at home: English, Spanish, Cantonese, Mandarin or Vietnamese.
- The new population of eligible unemployed customers.

2010 CARE Outreach Campaign Activity Highlights

The successful 2010 CARE outreach campaign included automated phone enrollment and recertification, targeted direct mail projects, online enrollment, door-to-door canvassing, participation in community events, integration with other departments and assistance programs, cross-utility data sharing, a capitation fee program and ethnic media.

Listed below are the top four methods PG&E utilized to reach customers during its 2010 CARE program outreach campaign: phone enrollment, direct mail, door-to-door canvassing and online enrollment. This combined approach resulted in 221,430 new enrollments.

Automated Phone Enrollment

The phone enrollment initiative continued to be vital in the CARE program's outreach efforts by providing a quick and efficient way to reach income-qualified customers via automated outbound phone calls. Working with a third-party vendor, PG&E utilized Automated Voice Messaging (AVM) technology, allowing customers to self-certify their eligibility and enroll/recertify in the program via a touchtone phone. 1.9 million calls were placed, resulting in 62,628 new enrollment and 62,535 recertifications.

Direct Mail

Direct mail continued to be the most successful outreach method in 2010. Bi-lingual applications were mailed to customers' homes, thereby reducing barriers to accessibility of enrollment information. Current CARE-enrolled customers were removed from the mailing lists, lowering duplication rates. CARE orchestrated the following direct mail projects:

- 130,000 direct mail pieces were mailed to customers residing at addresses of recently-closed CARE accounts, resulting in 4,043 new enrollments.

- 810,000 direct mail pieces were mailed to customers who had received a 15-day notice within the past year, resulting in 7,724 new enrollments.
- 200,000 direct mail pieces were mailed utilizing data from PG&E's customer information system. The list included customers who were on Medical Baseline or receiving life support, customers who had received a 48-hour notice within the past year, and customers who were required to submit a credit deposit within the past year. This initiative resulted in 5,064 new enrollments.
- 125,000 direct mail pieces were mailed to customers who had previously requested an application but did not mail it in or complete the enrollment process, resulting in 3,765 new enrollments.
- Every month, a direct mail piece was mailed to customers who were removed from CARE due to failure to recertify, asking them to re-apply for the program if they still qualified. A total of 58,000 direct mail pieces were mailed, resulting in 9,691 customers re-enrolling in the program.
- 3,500 direct mail pieces were mailed to a database of African American customers provided by a data source company, resulting in 41 new enrollments.
- 3,500 direct mail pieces were mailed to a database of Chinese customers provided by a data source company, resulting in 60 new enrollments.
- 1,000 direct mail pieces were mailed to a database of Vietnamese customers provided by a data source company, resulting in 25 new enrollments.
- 25,000 direct mail pieces were mailed to a database of Hispanic customers provided by a data source company, resulting in 581 new enrollments.
- 68,000 direct mail pieces were mailed to a database of senior customers provided by a data source company, resulting in 991 new enrollments.
- 9,000 direct mail pieces were mailed to a database of veteran customers provided by a data source company, resulting in 142 new enrollments.
- 80,000 direct mail pieces were mailed to a database of general audience customers provided by a data source company, resulting in 1,026 new enrollments.
- 1,525,000 direct mail pieces were mailed to customers on the Third Party Notification Program, which allows a customer to designate a friend or relative to receive duplicate copies of past-due payment notices, resulting in 24,427 new enrollments.
- 450,000 direct mail pieces were mailed to customers in specific zip codes with the highest percentages of CARE-eligible, un-enrolled customers, resulting in 10,006 new enrollments.

Door-to-Door Canvassing

PG&E contracted with third-party vendors who conducted door-to-door canvassing using a zip code list that targeted income-qualified neighborhoods. Authorized canvassers asked customers to verify their eligibility and enroll in the program at their place of residence. Canvassers assisted customers in completing the applications, collected and

mailed them to PG&E. One of the vendors focused on hard-to-reach rural areas. This initiative resulted in 29,225 new enrollments.

Online Enrollment

PG&E continued to utilize its website to promote the CARE program. Each application was posted in-language and in a format that allowed easy downloading and printing. Detailed information about the program was provided and links to other assistance programs were made available. This initiative resulted in 6,608 new enrollments.

With the online application available in English, Spanish and Chinese on PG&E's website, customers enrolled online using one of two options: completion of a simple form which requires no registration or via "My Account", which requires registration. Customers were able to complete the necessary household and income eligibility information, accept the declaration which states the information they provided is true, and submit the application electronically. Online enrollment resulted in 69,194 new enrollments.

PG&E continued a two-part eBill campaign to customers. The first segment consisted of a CARE message as part of the e-mail notification sent when a customer's bill is ready to view. The second segment consisted of an e-mail to targeted eBill customers, with a link to apply via their online account.

PG&E also utilized an online mailbox – CAREandFERA@pge.com – as an internal and external communication tool for any program-related inquiries. Listed below are the other highlights of the 2010 CARE program outreach campaign:

African American Outreach

PG&E participated in a variety of events to distribute CARE applications and collateral materials directly to members of the African-American community. These events included the San Francisco 60th Annual Juneteenth Festival, Sacramento 9th Annual Juneteenth Festival, Gospel by the Bay and Community Outreach Day.

A television commercial targeting the African American community was aired on CW Television in the San Francisco Bay Area and Sacramento. The commercial featured a CARE-enrolled family facing the economic crisis and describing ways in which the CARE program had made a significant difference in their lives.

A radio commercial targeting both the general market and the African American community was aired on 12 Clear Channel stations in the San Francisco Bay Area, Sacramento and Fresno. These commercials featured PG&E employees describing the benefits of the program.

3,500 direct mail pieces were mailed to a database of African American customers provided by a data source company, resulting in 41 new enrollments.

Asian American Outreach

PG&E participated in a variety of events to distribute CARE applications and collateral materials directly to members of the Asian-American community. These events included the Lunar New Year's Mixer, TET Festival in San Francisco, Vietnamese TET Festival, Lunar New Year Festival Community Fair, Chinese New Year Celebration, Pista Sa

Nayon, Philippine Independence Day, Pistahan Parade and Festival, 38th Annual Barrio Fiesta, 5th Annual Asian Resource Fair, Parol Outreach, San Francisco Parol Lantern Festival and Parade and Hmong International New Year.

- In-language prompts were featured on the CARE toll-free line for Cantonese, Mandarin and Vietnamese callers. Collateral materials in Chinese and Vietnamese languages were distributed via community events and COCs.
- 3,500 direct mail pieces were mailed to a database of Chinese customers provided by a data source company, resulting in 60 new enrollments.
- 1,000 direct mail pieces were mailed to a database of Vietnamese customers provided by a data source company, resulting in 25 new enrollments.

Targeted media was also an essential part of the Asian American campaign. A radio commercial in Chinese and Vietnamese aired on 94.1 FM KVTO and 1430 AM KVVN throughout the greater San Francisco Bay Area.

PG&E integrated CARE and LIEE by creating print advertisements promoting both programs in English, Spanish, Chinese and Vietnamese. Over 450,000 ads circulated throughout in the following areas: Sacramento, Stockton, Fresno and the San Francisco Bay Area.

Bill Inserts

PG&E continued to insert postage-paid bilingual mini applications into customers' monthly bills (in the March, June and August billing cycles). CARE inserted 9,600,000 applications, resulting in 17,445 new enrollments.

Community Events

One of the most effective ways to break down barriers, engage community leaders, and build trust in communities is through community events. PG&E participated in 130 multicultural events, bringing a face and personality to the CARE program. These events provided an opportunity for CARE staff to distribute collateral materials, hold face-to-face conversations with customers and network with organizations with similar goals. In many cases, staff members assisted customers in applying on-site via paper or an online application. These events also allowed PG&E to partner with COCs to rally further support for the program.

Community Outreach Contractors (COCs)

PG&E recruited and contracted with a diverse group of community-based organizations already recognized and trusted by their constituents. 177 organizations representing a wide array of communities signed on to promote CARE. There was at least one COC in each of PG&E's 48 counties.

All newly contracted COCs participated in program training and were provided collateral materials (e.g., applications, brochure holders, posters, poster stands, point-of-service boxes, event giveaways, clipboards, notebooks, polybags, t-shirts, and buttons) to display at their organizations and at outreach events.

Additionally, PG&E supported COCs by providing enrollment tips booklets, monthly electronic newsletters, a toll-free phone/fax line, an e-mail address, monthly progress reports, mid-year incentives, an end-of-year survey and holding a kick-off meeting, regional meetings, on-site visits, training sessions and partnered outreach events. COCs helped enroll 5,517 new customers.

Employee Involvement

PG&E continued its annual Employee Involvement initiative by engaging employees in promoting the CARE program. Throughout PG&E's service area, employees were encouraged to distribute applications to family, friends and neighbors who may be eligible. The initiative launched in June with an article and links to a CARE application and vignette on the PG&E@Work website. Throughout the year, the CARE team executed a variety of activities and collaborated with Employee Resource Groups. CARE distributed applications during Samahan's Career Fair, NuNRG's Employee Engagement Fair, PSEA's (Pacific Service Employee Association) retiree picnic and Concord Resource Management Center's Safety Fair. To further increase awareness, CARE worked with PSEA to include a CARE article and quiz in their employee newsletter. In addition, a CARE letter and applications were electronically inserted with online paychecks. These efforts resulted in 422 new enrollments.

Hispanic Outreach

PG&E participated in a variety of events to distribute CARE applications and collateral materials directly to members of the Hispanic community. These events included the Cinco de Mayo Fiesta Day, 14th Annual Family Fun Day, 2010 Backpack Drive, Head Start Connects with the Community, Health and Nutrition Fair, 7th Annual Healthy & Active Kids Multicultural Fair, Monument Community Health Fair, Second Harvest, Second Harvest 2, Parent Meeting (Shearer School) Presentation and YMCA Healthy Kids Day.

In-language prompts for Hispanic callers were featured on the CARE toll-free line.

25,000 direct mail pieces were mailed to a database of Hispanic customers provided by a data source company, resulting in 581 new enrollments.

PG&E integrated CARE and LIEE by creating print advertisements promoting both programs in English, Spanish, Chinese and Vietnamese. Over 450,000 ads circulated throughout in the following areas: Sacramento, Stockton, Fresno and the San Francisco Bay Area.

Integration and Leveraging

PG&E's CARE program integrated with other PG&E assistance programs, e.g., FERA, Cooling Centers and Energy Partners (PG&E's LIEE Program), in order to generate enrollments. CARE applications were on display and available to visitors at Cooling Centers. CARE applications were distributed at the TEAF (Temporary Energy Assistance for Families) Community Assistance Day in Fresno and customers who enrolled in TEAF were automatically enrolled in the CARE program. Data exchanges were conducted monthly with Energy Partners to automatically enroll eligible customers in CARE. PG&E also ran monthly reports of customers receiving bill payments through

the Low Income Home Energy Assistance Program (LIHEAP) and Relief for Energy Assistance through Community Help (REACH) programs and automatically enrolled eligible customers in CARE. These efforts resulted in 32,424 new enrollments.

PG&E integrated CARE and LIEE by creating print advertisements promoting both programs in English, Spanish, Chinese and Vietnamese. Over 450,000 ads circulated throughout in the following areas: Sacramento, Stockton, Fresno and the San Francisco Bay Area.

PG&E leveraged with other utilities by exchanging data of enrolled CARE customers in the shared service areas with Southern California Gas (SCG), Southern California Edison (SCE), Sacramento Municipal Utility District (SMUD) and Modesto Irrigation District (MID). These efforts resulted in 6,102 new enrollments.

Representatives from PG&E, SCG, SCE, SDG&E, SMUD, and Southwest Gas (SWG) held bi-monthly meetings to discuss best practices. During these meetings, representatives shared details of their current outreach initiatives, costs and recommendations as to whether others should incorporate them. These joint meetings provided significant value to the utilities by leveraging ideas, creating communication channels and promoting teamwork between programs.

Kiosks

Through the Local Office initiative implemented in 2004, PG&E installed ADA (Americans with Disabilities Act)-compliant self-service kiosks in local offices throughout the service area. These kiosks included an application holder and a slot where the customer could deposit the completed application. Each kiosk came with a lock and key in order to help maintain security and confidentiality. The kiosks helped raise awareness and generated new enrollments while providing a convenient way for customers to fill out a CARE application while waiting in line. In addition to the kiosks, customer service representatives were trained to speak about the benefits of CARE with every customer. This initiative resulted in 20,436 new enrollments.

Multicultural Collateral

A variety of collateral materials was produced and utilized to help PG&E and its partners in grassroots outreach efforts. Brochure applications were printed and distributed to potential CARE customers. These brochures came in three versions: English/Spanish, English/Chinese and English/Vietnamese. Bilingual posters, banners, brochure holders, in-language buttons, clipboards, enrollment tips booklets and t-shirts were distributed to various organizations and constituted great tools to share information about the program. Collateral giveaway materials included pens, mirror brushes, coin purses, first-aid kits, pill boxes and coloring books. These items were distributed to potential customers at multicultural events as well as through COCs. All items contained the CARE tagline (“Save Money on your PG&E bill”) and the toll-free phone number.

Native-American Outreach

PG&E participated in a variety of events to distribute CARE applications and collateral materials directly to members of the Native American community. These events included the 39th Annual Stanford Powwow; Standing Bear Powwow; 6th Annual

American Indian Market and Powwow and Tribal TANF Administrators' Meeting Presentation

Paid Media

PG&E utilized local radio and television to reach large numbers of eligible customers. Grassroots media builds awareness quickly and enhances the effectiveness of marketing and outreach initiatives.

A television commercial targeting the general market and the African American community aired on CW Television in the San Francisco Bay Area and Sacramento. The commercial featured a CARE-enrolled family facing the economic crisis and describing ways in which the CARE program had made a significant difference in their lives.

A radio commercial targeting both the general market and the African American community aired on 12 Clear Channel stations in the San Francisco Bay Area, Sacramento and Fresno. These commercials featured PG&E employees describing the benefits of the program. A radio commercial in Chinese and Vietnamese aired on 94.1 FM KVTO and 1430 AM KVVN throughout the greater San Francisco Bay Area.

PG&E integrated CARE and LIEE by creating print advertisements promoting both programs in English, Spanish, Chinese and Vietnamese. Over 450,000 ads circulated throughout in the following areas: Sacramento, Stockton, Fresno and the San Francisco Bay Area.

Public Affairs

The PG&E CARE program maintained open communication with PG&E's governmental relations representatives by keeping them informed of major outreach efforts on a monthly basis. The representatives served as a conduit between CARE and the community and connected the program with community-based organizations that were interested in becoming COCs.

Recertification Efforts

Customers are required to recertify for CARE every two years or four years if they are on a fixed-income.

PG&E mailed a recertification application package in four languages (English, Spanish, Chinese and Vietnamese) to customers 90 days prior to the expiration of their CARE discount. A reminder letter was mailed to customers who still had not responded 30 days prior to the expiration of their discount and served as a final reminder to recertify.

PG&E continued working with a third-party vendor to place CARE recertification outbound phone calls. To reduce mailing costs, the initial phone call was placed prior to the recertification package being mailed. Calls were then made monthly throughout the 90 day recertification period to allow customers the opportunity to recertify by phone instead of filling out the application.

Through these combined outreach efforts, CARE recertified 221,272 customers for a retention rate of 79 percent.

Senior and Disabled Outreach

PG&E continued its outreach to seniors and those with disabilities. PG&E distributed large-print applications and implemented a targeted direct mail project. 68,000 pieces were mailed to a database of senior customers provided by a data source company. This initiative resulted in 991 new enrollments. Additionally, 9,000 direct mail pieces were mailed to a database of veteran customers provided by a data source company. This initiative resulted in 142 new enrollments.

Since this customer group tends to get overwhelmed with the steps involved in the application process, PG&E participated in a number of community events providing face-to-face interaction. These events included Los Banos Senior Breakfast, Senior Center Open House, Santa Cruz Seniors Presentation, 28th Annual City of Richmond Senior Information and Health Faire, Senior Center Presentation, Senior Awareness Day 2010, 2nd Annual Senior Summer Festival, Manteca Senior Breakfast, 13th Annual Senior Resource Fair, 14th Annual Tribute to Seniors, Albany Halloween Senior Fair, Casa Nova Mobile Home Park Presentation, 2010 Healthy Living Festival, 11th Annual Membership Appreciation Breakfast & Health Fair, Sacramento Mutual Housing Association Presentation and the CPUC Consumer Workshop.

Social Online Media

PG&E maintained its CARE Facebook fan page to promote the program and its benefits. Social online networking media creates a fan base for the CARE program. The page prompts customers to apply online using a Facebook link to the CARE website. With a base of over 500 fans, customers also have the ability to ask questions, make comments about CARE and learn about upcoming events. This medium gives customers another method of communication with PG&E.

Sub-Metered

PG&E reached out to sub-metered tenants by mailing enrollment packets to sub-metered facility managers across its service area. The packets informed the managers about the benefits of CARE and encouraged them to distribute applications to their tenants.

Toll-Free Line

PG&E's CARE campaign utilized a toll-free line (1-866-743-2273) to help customers learn about CARE and address questions. The 24-hour toll-free line operated in five languages: English, Spanish, Mandarin, Cantonese and Vietnamese. It provided customers with the following information: answers to frequently-asked questions, a list of COCs by zip code/area code, a prompt to request a CARE application, a listing of CARE events and information about the recertification process.

PG&E also utilized additional toll-free phone and fax lines to assist customers: COC (1-800-239-5170/1-800-239-6410); Post Enrollment Verification (1-877-302-8558/1-877-302-7563); Sub-Metered (415-972-5732); and Non-Profit (415-973-7288). These lines operated Monday through Friday from 8:00 a.m. – 5:00 p.m.

All calls were monitored and tracked as part of the ongoing effort to provide effective customer service.

2.4.2. Discuss the most effective outreach method, including a discussion of how success is measured.

The most effective outreach method in 2010 was online enrollment. With the application available in English, Spanish and Chinese on PG&E's website, customers enrolled online using one of two options: completion of a simple form which requires no registration or via "My Account," which requires registration. Customers were able to complete the necessary household and income eligibility information, accept the declaration which states the information they provided is true, and submit the application electronically. This allowed customers to complete the application process at their convenience from their location of choice. The online enrollment initiative was successful, whereas it resulted in an extremely high number of new enrollments (69,194) with a minimal cost for PG&E.

2.4.3. Discuss barriers to participation encountered during the reporting period and steps taken to mitigate them

Trust

Lack of trust and customers questioning the legitimacy of the program continued to present a significant barrier to participation. To counter customer misperceptions, PG&E implemented outreach methods to hold face-to-face interactions with customers about the benefits of CARE. These methods included participation in 130 community events and presentations and partnerships with 177 COCs, and were instrumental in breaking down the trust barrier and enrolling new customers.

Geography

Another barrier to enrollment is the extent to which customers are scattered throughout the PG&E service area. The geographic dispersion of the rural customer population presents challenges in informing customers about the CARE program, and PG&E has made a concerted effort to find and enroll customers in these less populated locations. PG&E partnered with a third-party vendor to perform door-to-door canvassing in remote locations, speaking to customers face-to-face and helping them to complete the application.

Language

Given the extremely diverse population of California, language continues to be a significant barrier to communicating program information to eligible customers. PG&E published a Breathe Easy Solutions brochure, highlighting information about CARE and other assistance programs in seven languages (English, Spanish, Chinese, Vietnamese, Hmong, Korean and Russian). Also, PG&E produced all CARE applications and collateral in four languages (English, Spanish, Chinese and Vietnamese) and provided a toll-free line in English, Spanish, Vietnamese, Mandarin and Cantonese. Furthermore, PG&E is requesting additional funding in the 2012-2014 application filing to accommodate production of collateral and applications in three additional languages (Hmong, Korean and Russian).

2.4.4. Discuss how CARE customer data and other relevant program information is shared by the utility with other utilities sharing its service territory

A small geographic location of PG&E's service area is shared with other investor owned or municipal utilities. PG&E continued automatic enrollment agreements with SCG, SCE, SMUD, and MID to exchange listings of enrolled CARE customers that are identified in the shared service areas. By sharing customer data, PG&E was able to enroll qualified customers in CARE and vice versa. Through these exchanges, PG&E enrolled over 6,000 customers in the CARE program in 2010. PG&E also attempted to expand its leveraging efforts with other municipal utilities by sending data sharing proposals to Lodi Electric Utility, Roseville Electric, and Turlock Irrigation District in 2010. Both Lodi Electric and Roseville Electric declined due to customer confidentiality concerns. The proposal is still under review by Turlock Irrigation District.

2.4.5. Discuss how CARE customer data and other relevant program information is shared within the utility, for example, between its LIEE and other appropriate low income programs.

A database of all CARE customer contact information is uploaded for weekly distribution to PG&E's LIEE program providers to use for their outreach. Since November 1, 2005, when the LIEE and CARE income guidelines became the same at 200 percent of the Federal Poverty Guidelines, CARE has been able to automatically enroll customers who have participated in the LIEE program.

Since the CARE discount is noted in the customer information system, Customer Service Representatives (CSRs) are able to see the CARE status of any customer calling PG&E's contact centers for assistance. This provides important information for the customer service representative to use when discussing other benefits and services that may be of assistance to the income-qualified customer.

CARE features other financial assistance information on its applications. Each 8.5" x 11" applications provide a brief description of other assistance programs available as well as contact numbers.

CSRs in PG&E's contact centers provide customers with information about the federally funded, state-administered LIHEAP, as well as PG&E's free assistance programs (including Energy Partners, CARE, FERA, REACH, Medical Baseline, Third-Party Notification, Energy Efficiency Rebates, Automatic Payment Service, Balanced Payment Plan, Bill Guaranty, Payment Arrangement, Cooling Centers and SmartAC). The CARE Processing Center also provides referral information to customers in need of additional assistance.

PG&E continues to automatically enroll customers into CARE who participate in the Energy Partners (LIEE), LIHEAP, and Relief for Energy Assistance through Community Help (REACH). Through these exchanges, PG&E enrolled 32,000 new customers in CARE in 2010.

2.4.6. Describe the efforts taken to reach and coordinate the CARE program with other related low income programs to reach eligible customers.

PG&E's CARE program integrated with other PG&E assistance programs, e.g., FERA, Cooling Centers and Energy Partners (PG&E's LIEE Program), in order to generate enrollments. CARE applications were on display and available to visitors at Cooling Centers which partnered with PG&E. CARE applications were distributed at the TEAF (Temporary Energy Assistance for Families) Community Assistance Day in Fresno. Data exchanges were conducted monthly with Energy Partners to automatically enroll eligible customers in CARE. Customers who applied for FERA but qualified for CARE were also automatically enrolled. PG&E also ran monthly reports of customers receiving bill payments through the LIHEAP and Relief for Energy Assistance through Community Help (REACH) programs and automatically enrolled eligible customers in CARE. These efforts resulted in 32,424 new enrollments.

PG&E integrated CARE and LIEE by creating print advertisements promoting both programs in English, Spanish, Chinese and Vietnamese. Over 450,000 ads circulated throughout in the following areas: Sacramento, Stockton, Fresno and the San Francisco Bay Area.

PG&E leveraged with other utilities by exchanging data of enrolled CARE customers in the shared service areas with Southern California Gas (SCG), Southern California Edison (SCE), Sacramento Municipal Utility District (SMUD) and Modesto Irrigation District (MID). These efforts resulted in 6,102 new enrollments.

Representatives from PG&E, SCG, SCE, SDG&E, SMUD, and Southwest Gas (SWG) held bi-monthly meetings to discuss best practices. During these meetings, representatives shared details of their current outreach initiatives, costs and recommendations as to whether others should incorporate them. These joint meetings provided significant value to the utilities by leveraging ideas, creating communication channels and promoting teamwork between programs.

- 2.4.7.** Describe the process for cross-referral of low income customers between the utility and CSD. Describe how the utility's CARE customer discount information is provided to CSD for inclusion in its federal funds leveraging application. (Note: These agreements are limited to sharing 1-800 phone numbers with customers and providing CARE benefit information for the federal fiscal year, October 1 of the current year through September 30 of the subsequent year. There are no tracking mechanisms in place to determine how many customers contact the other programs or actually become enrolled in other program(s) as a result of these agreements.)

PG&E has provided assistance by leveraging federal funding through the Home Energy Assistance Program (HEAP) on an annual basis since 1989. The primary information provided to the California Department of Community Services and Development (CSD) is a monthly breakdown of the total number of participants (residential and sub-metered tenant count) along with the total dollar amount of discount provided to that portion of the population during that period.

- 2.4.8.** Discuss any recommendations to improve cost-effectiveness, processing of applications, or program delivery. Discuss methods investigated or implemented by the utility or third parties under contract to the utility to improve outreach and enrollment services to non-participating households in the prior year. Provide cost-effectiveness assessments, if available.

In order to streamline efforts and cost-efficiencies, PG&E enhanced its CARE enrollment process by contacting income-qualified customers using multiple communication methods. Initial contact began by encouraging customers to apply for CARE via their land-line phone. The phone enrollment effort resulted in a \$3.54 cost per enrollment. Customers who could not be reached by phone later received a direct mail piece which included a CARE application. The direct mail enrollment effort resulted in a \$19.07 cost per enrollment. Customers who did not reply to the direct mail piece were later visited by an authorized third party to enroll in CARE. The door-to-door canvassing resulted in a \$17.29 cost per enrollment. These communication methods were cost-effective for PG&E and allowed income-qualified customers to enroll in CARE as conveniently as possible. The multi-faceted approach helped minimize geographical barriers and enabled CARE to enroll 135,308 new customers.

2.5. Processing Care Applications

2.5.1. Describe the utility's process for recertifying sub-metered tenants of master-meter customers.

Decision 08-11-031, Ordering Paragraph 100, authorized PG&E to change the certification period for sub-metered tenants from one year to two years. PG&E mails the recertification package to sub-metered tenants 90 days prior to their CARE expiration date. The tenants are removed from the CARE rate if they do not respond.

2.5.2. Describe any contracts the utility has with third parties to conduct certification, recertification and/or verification on the utility's behalf. Describe how these third-party efforts compare to the utility's efforts in comparable customer segments, such as hard-to-reach or under-served. Include comparisons of effectiveness and cost-effectiveness of comparable customer segments, if available.

PG&E had three contracts with third-party vendors to conduct certification and recertification in 2010. These vendors were SoundBite Communications, Energy Save and Trimmer Agency. Their functions are described in detail in Section 2.4.

2.6. Program Management

2.6.1. Discuss issues and/or events that significantly affected program management in the reporting period and how these were addressed.

In D.08-11-031, the CPUC approved the CARE Program for Program Years (PY) 2009-2011, with the following requirements:

1. Change the certification period for sub-metered and expansion programs from one year to two years.
2. Make all categorical eligibility requirements that apply to LifeLine the same as those for CARE, except for Public Housing Section 8.
3. Coordinate all LIEE outreach with CARE.
4. One-e-App Pilot in 2009.
5. CARE Recertification and Post Enrollment Verification Non-Response Study in 2010.
6. CARE penetration goal of 90 percent by 2011.

PG&E implemented the first three requirements in the first half of 2009.

PG&E partnered with The Center to Promote HealthCare Access, Inc., (The Center) to launch the One-e-App Pilot in September of 2009. One-e-App is a Web-based, one-stop eligibility system accessible at a variety of community organizations, which connects families with a range of publicly funded health and human service programs. The pilot

took place in Fresno, San Joaquin, Solano, Napa, Sacramento, Humboldt, and Sonoma Counties. Income-qualified customers in these counties were able to meet with a Certified Application Assister and enroll in CARE through the One-e-App system. The pilot resulted in 43 new enrollments. The deliverable for the pilot was a post go-live report that The Center submitted to Energy Division on March 17, 2010. The pilot is generally considered unsuccessful, given the low customer participation and high cost per new enrollment, and was effectively completed on December 31, 2010.

PG&E conducted the CARE Recertification and Post Enrollment Verification Non-Response Study in 2010. The results of the study will be incorporated into 2011 and 2012-2014 program cycle.

PG&E met the 90 percent penetration goal in 2010 ending the year with an actual 92.6 percent penetration. Since there were more than 900,000 customers enrolled or recertified in 2009, of which the majority will be required to recertify in 2011, PG&E strives to maintain the 90 percent penetration rate by focusing on retaining these customers in 2011.

Process improvement ideas to reduce cost and improve outreach effectiveness were encouraged, promoted, reviewed and implemented at PG&E. PG&E implemented over 10 process improvements in 2010. These included developing new database to increase enrollment and recertification efficiency, enhancing Post Enrollment Verification (PEV) process to cut down verification time, and improving the customer opinion survey questionnaire and interviewing process.

In an ongoing effort to protect the environment and reduce printing and mailing costs, PG&E encouraged sub-metered facility landlords/managers to sign-up to receive their monthly CARE certification reports via e-mail. Many facilities had requested receipt of their reports electronically.

3. CARE Expansion Program

3.1. Participant Information

3.1.1. Provide the total number of residential and/or commercial facilities by month, by energy source for the reporting period.

See CARE-Table 12.

3.1.1.1. State the total number of residents (excluding caregivers) for residential facilities, and for commercial facilities, by energy source, at year-end.

There were 192,601 tenants residing within facilities receiving the CARE discount by December 31, 2010. This information is not available by energy source. The resulting numbers were representative of the total number of residents housed in all facilities, both residential and commercial, and for both energy commodities.

3.2. Usage Information

3.2.1. Provide the average monthly usage by energy source per residential facility and per commercial facility.

See CARE-Table 12.

3.3. Program Costs

3.3.1. Administrative Cost (Show the CARE Expansion Program's administrative cost by category)

See CARE-Table 1.

3.3.1.1. Discount Information

Following is the total annual discount, by energy source, for the CARE Expansion Program:

Electric: \$7,057,393

Gas: \$1,021,484

Total: \$8,078,877

3.3.1.2. State the average annual CARE discount received per residential facility by energy source

Electric: \$811.92

Gas: \$128.64

3.3.1.3. State the average annual CARE discount received per commercial facility by energy source.

Electric: \$4,632.79

Gas: \$1,003.98

3.4. Outreach

3.4.1. Discuss utility outreach activities and those undertaken by third parties on the utility's behalf.

Agricultural employee housing facilities continue to be a difficult demographic for the CARE program to reach. To be certified for CARE, these facilities must be permitted by the California Housing and Community Development Department (HCD) in addition to meeting the CARE income guidelines. PG&E obtained a list of currently permitted facilities from the HCD and mailed a CARE outreach packet to the operators. As a result, one new facility was enrolled on CARE.

PG&E obtained a nonprofit mailing list from the United Way Bay Area to outreach to group living facilities/shelters within its network. PG&E also utilized its database of facilities previously dropped from CARE due to lack of recertification. As a result, nine new facilities were enrolled on CARE

CARE continued to use the PG&E website as a useful source of information. As new program information and income guidelines became available, applications were updated online in formats that allowed for easy download and printing. As a result, 19 new facilities were enrolled on CARE.

PG&E did not work with third parties on the utility's behalf.

3.4.2. Discuss each of the following:

3.4.2.1. Discuss the most effective outreach method, including a discussion of how success is measured.

The downloading and printing of the nonprofit group living facility application became the most effective outreach method because nonprofit organizations seeking financial assistance could easily obtain program information online. In addition, PG&E was available via telephone or e-mail to address any questions pertaining to their eligibility and account information.

3.4.2.2. Discuss how the CARE facility data and relevant program information is shared by the utility with other utilities sharing service territory.

PG&E does not currently exchange CARE facility data or expansion program information with other utilities in the shared service areas.

3.4.2.3. Discuss barriers to participation encountered in the prior year and steps taken to mitigate these, if feasible, or not, if infeasible.

The certification period for nonprofit group living facilities is two years. At the end of the two-year period, PG&E mails a recertification packet to the listed primary contact. Due to organization's frequent personnel changes, the current staff is not always aware of the CARE program or the recertification process. As the result, approximately half of the organizations did not recertify though they still qualified for the discount. To address this barrier, PG&E proactively called customers to remind them to recertify, answer questions they might have and guide them through the process.

For the agricultural employee housing facilities, the barriers were the lack of understanding of CARE program criteria and the perception of inconvenient paperwork. Facility owners and managers were unsure about the type of permit requirements. Some believed their facility would not qualify because the company is a business or the tenants

did not pay for utilities or did not live in the housing facility year round. PG&E overcame these barriers by working one-on-one with the facility owners and managers to ensure successful enrollment.

3.4.3. Discuss any recommendations to improve the cost-effectiveness, processing of applications, or program delivery. Discuss methods investigated or implemented by the utility or third parties on the utility's behalf to improve outreach and enrollment services to non-participating facilities in the prior year. Provide cost-effectiveness assessments, if available.

PG&E continued to reach out to agricultural facilities and implemented a targeted approach to those facilities not currently enrolled in the CARE program. In addition to the direct mail, the availability of the CARE applications online helped interested organizations apply for the program. The collective efforts led to a greater audience and enrolled more hard-to-reach customers into CARE. As a result of this outreach, a total of 29 new facilities were certified for CARE.

The Nonprofit and Agricultural Housing mass mailing initiative was created and mailed in-house to make the initiative cost-effective. CARE is planning to leverage with other utilities in California to exchange nonprofit group living facility and agricultural employee housing information in 2011.

3.5. Program Management

3.5.1. Discuss issues and/or events that significantly affected program management in the reporting period and how these were addressed.

The most significant event that affected the program management in 2010 was the economic downturn. Because of this downturn, many organizations were forced to either downsize, resulting in frequent personnel changes, or close down due to lack of funding. PG&E addressed these by being more proactive in contacting the organizations and working closely with them one-on-one.

4. Cooling Centers Program

Cooling centers are facilities opened to the public and operated during hot summer months in order to provide the elderly and others with shelter from heat. The use of cooling centers can reduce the risk of experiencing heat-induced ailments for the targeted population of elderly and low-income citizens.

PG&E's Cooling Centers Program worked with local governments to support their existing cooling center programs, to educate targeted customers on heat preparedness, and to publicize the location and accessibility of cooling center locations within PG&E's service area. In addition, PG&E provided material, financial and other support to selected local government-operated cooling centers for the purpose of increasing

participation among low- and fixed-income customers. D. 08-11-031 adopted the Cooling Centers Program for 2009 – 2011, funded under the CARE Program.

4.1. Local Government Partnerships

PG&E believes that local governments who operate existing cooling centers have a greater familiarity with the needs of their respective populations, as well as an understanding of the optimal locations and what is needed to improve participation. Additionally, many local governments in heat-susceptible areas have already established cooling centers or have filed emergency plans with the Governor's Office of Emergency Services (OES).

In order for any local government to participate in PG&E's Cooling Centers Program and receive the grant, it needs to meet the following criteria:

- Free entrance for all customers;
- No discrimination in admitting attendees;
- Be accessible via public transportation or shuttle service;
- Provide a safe and comfortable atmosphere;
- Provide seating areas;
- Provide complimentary water;
- List disability access;
- Have specific trigger criteria to open cooling centers; and
- Distribute brochures advertising other PG&E services such as CARE, FERA, and Energy Savings Assistance Program (PG&E's LIEE Program).

Through existing 2009 partnerships and integration efforts between programs and its internal Governmental Relations department, PG&E was able to establish partnerships with the following 10 local government organizations in 2010:

- Sanger City Fire Department;
- Fresno Rural Transit Agency;
- City of Fresno, Parks, Recreation, After School and Community Services;
- City of Fowler;
- City of Arvin;
- Kern County Aging and Adult Services / Kern County Department of Parks and Recreation;
- Merced County Office of Emergency Services;
- City of Madera Office of Emergency Services;
- City of San Jose Department of Parks, Recreation and Neighborhood Services; and

- City of Riverbank.

4.2. Outreach

Marketing and Outreach

Through discussions with cooling center coordinators and other sources, PG&E learned that customer awareness of cooling centers was minimal. Despite the availability of cooling centers in their counties, many customers did not go to these centers because they were either unaware of their existence or unaware of the serious risks of extended heat exposure and how to address these risks. PG&E created bilingual brochures to inform customers about how to stay cool and how to locate and contact a cooling center.

Website

PG&E continued to use a dedicated PG&E Cooling Centers website - www.pge.com/coolingcenters - as a communication channel to cooling centers in PG&E's service area. On the website, customers can use an interactive map to locate cooling centers in their area. The website provides contact information, hours of operation, and disability access information as available for each cooling center registered. The website also provides a link to local governments' emergency websites related to cooling centers, transportation services, general heat-related health and safety information, and PG&E assistance programs that might benefit target customers (e.g., CARE, FERA and LIEE).

Safety information is available in four languages: English, Spanish, Chinese and Vietnamese. The PG&E Cooling Centers website is also American Disability Act (ADA)-compliant to assist visually disabled customers.

Information about cooling centers was also posted on local government websites about their respective centers.

Toll-free Line

PG&E continued to use an automated phone information system. Customers can call toll-free at 1-877-474-3266 to access information regarding cooling center locations, contact information, operating hours, and the accessibility of cooling centers in their area. Customers with speech and hearing impairments can also call the TDD/TTY 1-800-652-4712 to access cooling center information.

PG&E contact center staff were trained on heat preparedness education and on the PG&E Cooling Centers Program to serve customers who prefer to speak to a PG&E customer representative.

Bill Insert

Information on the PG&E Cooling Centers Program and heat-preparedness was made available to customers in the form of a bill insert that was sent to customers via their paper bills or e-Bills.

Radio and Other Media

During the summer when cooling centers received notice from the Mayor, City Council and City Manager's Offices to open, each local government informed customers via local media outlets of the risks associated with heat exposure, to take shelter during periods of extreme heat, and to find the cooling center nearest to them.

Within its resources, each local government also employed channels such as fliers, posters, and local newspapers to raise awareness about cooling center availability and to make announcements of when cooling centers would be open in the area.

Collateral

PG&E distributed Cooling Center brochures at PG&E events where other assistance programs were promoted. Cooling Center brochures provided tips for preparing for hot weather, identified symptoms of heat-related illnesses, and explained how to locate cooling centers. The brochure was designed utilizing a large font and was available in English, Spanish, Chinese, and Vietnamese. PG&E distributed cooling center information through CARE events, local governments, community-based organizations, and nonprofit organizations in targeted regions. Cooling Center stickers were distributed to partnered local governments to help customers identify cooling centers in their area.

4.3. Program Management

Due to the State budget deficit and economic crisis, many local governments experienced a shortage of resources to support their cooling centers. Although PG&E's grant helped to subsidize some or most of the costs, many still had to cut back on locations and their hours of operation. With this in mind, PG&E plans to reevaluate and adjust the grant amounts in 2011 to ensure more locations will be open and available to public.

Through reports from local governments, PG&E learned cooling centers were not always utilized by local citizens and it was hard to differentiate between cooling center patrons and regular patrons. Due to short notice, especially when cooling centers were open on the weekends, it was also a challenge for local governments to advertise and to get the word out to communities.

5. Fund Shifting

5.1.1. Report LIEE fund shifting activity that falls within rules laid out in Section 20.1 of D. 08-11-031

In Compliance with Ordering Paragraph 85 of D. 08-11-031, which states: "fund shifting from one year to another within 2009-11 cycle: Allowed up to 15% of total LIEE budget without Advice Letter subject to limitation below; Tier 2 Advice Letter pursuant to General Order 96-B required for larger amounts," PG&E filed Advice Letter 3075-G/3585-E requesting approval to carry forward its remaining Program Year (PY) 2009 funds to PY 2010. The actual under spending for PY 2009 was 15.3%, or \$16.6 million. For Program Year 2010, the under spend is \$24.1 million, or 14.4% of its budget which includes the PY 2009 carryover funding. PG&E intends to use these funds to augment the PY 2011 measure funding.

5.1.2. Report CARE fund shifting activity that falls within rules laid out in Section 20.1 of D. 08-11-031

In compliance with Ordering Paragraph 85 of D. 08-11-031, authorizing CARE fund shifting between categories, PG&E shifted \$16,002 from the Automatic Enrollment category to the Information Technology/ Programming category to cover the overspend. The CARE total administrative expenses in 2010 did not exceed the overall authorized budget.

5.1.3. Was there any LIEE or CARE fund shifting activity that occurred that falls OUTSIDE the rules laid out in Section 20.1 of D. 08-11-031?

There was no LIEE or CARE fund shifting activity that occurred that falls outside the rules laid out in section 20.1 of D. 08-11-031.

6. Appendix: LIEE Tables and CARE Tables

LIEE- Table 1- LIEE Overall Program Expenses

LIEE- Table 2- LIEE Expenses & Energy Savings by Measures Installed

LIEE- Table 3- LIEE Cost Effectiveness

LIEE- Table 4- LIEE Penetration

LIEE- Table 5- LIEE Direct Purchases & Installation Contractors

LIEE- Table 6- LIEE Installation Cost of Program Installation Contractors

LIEE- Table 7- Expenditures by Cost Elements

LIEE- Table 8- Detail by Housing Type and Source

LIEE- Table 9- Life Cycle Bill Savings by Measure

LIEE- Table 10- Energy Rate Used for Bill Savings Calculations

LIEE- Table 11- Bill Savings Calculations by Program Year

LIEE- Table 12- Whole Neighborhood Approach

LIEE- Table 13- Categorical Enrollment

LIEE- Table 14- Leveraging

LIEE- Table 15- Integration

LIEE- Table 16- Lighting

LIEE- Table 17- Studies & Pilots

LIEE- Table 18- "Add Back" Measures

LIEE- Table 19-LIEE Fund Shifting

CARE- Table 1- CARE Overall Program Expenses

CARE- Table 2- CARE Enrollment, Recertification, Attrition, and Penetration

CARE- Table 3- CARE Verification

CARE- Table 4- Self-Certification and Self-Recertification

CARE- Table 5- Enrollment by County

CARE- Table 5- Capitation Contractors

CARE- Table 6- Recertification Results

CARE- Table 7- Capitation Contractors

CARE- Table 8- Participants per Month Fund Shifting

CARE- Table 9- Average Monthly Usage & Bill

CARE- Table 10- CARE Surcharge & Revenue

CARE- Table 11- CARE Capitation Applications

CARE- Table 12- CARE Expansion Program

CARE- Table 13- CARE Fund Shifting

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is 77 Beale Street, San Francisco, California 94105

On May 2, 2011, I served a true copy of:

**ANNUAL REPORT OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 M) ON THE
RESULTS OF ITS LOW INCOME ENERGY EFFICIENCY AND CALIFORNIA
ALTERNATIVE RATES FOR ENERGY PROGRAM EFFORTS FOR PROGRAM
YEAR 2010**

- [XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service lists for A.08-05-022, et al. with an e-mail address.
- [XX] By U.S. Mail – by placing the enclosed for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to those parties listed on the official service lists for A.08-05-022, et al. without an e-mail address.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 2nd day of May 2011, at San Francisco, California.

/s/

TAUVELA U’U

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

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