

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

Order Instituting Rulemaking on the)	Rulemaking 04-01-006
Commission's Proposed Policies and)	(Filed January 8, 2004)
Programs Governing post-2003 Low-)	
Income Assistance Programs.)	A.05-06-005, A.05-06-009
)	A.05-06-012, A.05-06-013
<u>And Related Matters</u>)	

**REPLY OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO
COMMENTS ON PROPOSALS TO MITIGATE BILL IMPACTS ON LOW-
INCOME CUSTOMERS DURING THE 2005 WINTER**

MICHAEL D. MONTOYA
LARRY R. COPE

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-2570
Facsimile: (626) 302-7740
E-mail: Larry.Cope@sce.com

Dated: **October 19, 2005**

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

Order Instituting Rulemaking on the)	
Commission's Proposed Policies and)	Rulemaking 04-01-006
Programs Governing post-2003 Low-)	(Filed January 8, 2004)
Income Assistance Programs.)	
)	A.05-06-005, A.05-06-009
<u>And Related Matters</u>)	A.05-06-012, A.05-06-013

**REPLY OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO
COMMENTS ON PROPOSALS TO MITIGATE BILL IMPACTS ON LOW-
INCOME CUSTOMERS DURING THE 2005 WINTER**

I.

INTRODUCTION

Southern California Edison Company (SCE) submits these reply comments in accordance with ALJ Weissman's October 7, 2005 email ruling allowing for reply comments related to parties' proposals for changes to low income programs in the upcoming 2005-2006 winter season. SCE appreciates the consideration that has been provided to its proposals by parties that have submitted comments. In response to ALJ Weissman's ruling, SCE and other parties have submitted proposals on October 11, 2005, and submitted comments on October 17, 2005. SCE's proposals include plans to help mitigate the affects on low income customers of expected high natural gas bills this winter. SCE appreciates the opportunity to reply to the specific comments provided by the Office of Ratepayer Advocates (ORA), Sempra, Pacific Gas and Electric (PG&E), Latino Issues Forum (LIF), Disability Rights Advocates (DRA), Bay Area Poverty Resource Council (BAPRC), Greenlining Institute (Greenlining), TURN, and Reliable Energy Management (REM).

A. Moratorium on Service Shut-Offs and Other Credit Related Issues

SCE proposes to waive reconnect deposits for CARE customers who are disconnected for non-payment. ORA in its comments supports SCE's proposal. Sempra proposes a shut-off moratorium for CARE, FERA, and Medical Baseline customers making payments equal to the amount they were billed for the same period in the prior year, and PG&E supports a shut-off moratorium for residential and small business customers if they pay 50% of their outstanding balances and enroll in PG&E's Balanced Payment Plan. BAPRC, LIF, and TURN support moratoriums for customers making partial payments. LIF has noted its concern that a full moratorium will leave customers unable to pay bills when the moratorium expires. SCE carefully considered various options for addressing customers' needs this winter. SCE believes waiving reconnect deposits, using existing flexibility in credit policies, and expanding CARE eligibility for customers who are seniors or disabled provide a comprehensive approach for addressing high energy bills this winter.

B. Rate Freeze

SCE reiterates its opposition to rate freezes for CARE, FERA, and Medical Baseline customers for the reasons stated in its October 17, 2005 comments. Greenlining, TURN, LIF, BAPRC and DRA have filed comments which support freezing rates for CARE, FERA, and Medical Baseline customers. TURN has suggested limiting rate increases to 20% for all residential customers. As ORA notes in its comments, freezing rates for CARE customers would require a more deliberate review that cannot occur within the time available for the Commission to act on October 27, 2005. SCE's proposals can be implemented quickly and provide a preferred approach for helping to mitigate high energy bills this winter.

C. Energy Workshops at CBO Locations

REM opposes energy workshops at CBO locations and correctly states that customers receive in-home energy education that is directly related to the measures being installed in their homes. SCE at this time wishes to clarify its comments regarding Workshops at CBO locations that were submitted on October 17, 2005, where SCE stated it pays half the costs of workshops conducted by the Southern California Gas Company (SoCalGas) in the joint utility service area. SCE pays half the cost for providing in-home energy education for customers receiving LIEE services. SCE believes in-home energy education for customers provides on-site delivery of conservation tips and practices.

D. LIEE Ten Year Go Back Rule

Sempra, on behalf of San Diego Gas & Electric (SDG&E), and SoCalGas, PG&E, and REMCO oppose modifications to the ten year go back rule. SCE believes there are circumstances where the ten year go back rule hinders the ability to provide electric measures in homes, particularly given that the list of eligible measures changes from time to time. SCE believes it would be useful for the Standardization Team to consider potential modifications that can address these concerns.

E. Training for Authorized Payment Locations

SDG&E and SoCalGas responded to TURN's recommendation that all local utility outlets receive special training on the availability of rate assistance programs and train their personnel to assist customers with sources of financial assistance and utility payment plans, with a discussion of their practices. SCE notes that its network of authorized payment agencies provide much needed local access to our customers that augments services that can be received by telephone.

Many locations have on-site displays that hold brochures including CARE applications. SCE conducts a number of outreach activities at these locations through "Promotional Days" where SCE employees go to the agencies and provide information on customer programs and services that SCE offers. Many customers are given applications for CARE and other payment options.

F. Recertification

SCE proposes to continue CARE recertification this winter but suspend the removal of customers from the CARE rate who fail to respond to requests for recertification until after the winter period is over. SCE is pleased that ORA supports SCE's recertification proposal.

G. CARE Outreach

DRA states that with the exception of SDG&E and SoCalGas, the utilities offered no proposals regarding outreach. Specifically, DRA alleges the utilities address ways to maintain current CARE customers but do not offer proposals to increase CARE penetration. DRA's assertion is incorrect. SCE described its Targeted CARE Communications Campaign in its proposal that was submitted to the Commission on September 28, 2005. Moreover, in the same submittal SCE discussed its approach for working with agriculture and service employers to reach 750 to 1,000 small businesses with information about CARE and other programs for their employees. These specific proposals do not require the Commission's approval to implement, and therefore, were not included in SCE's October 11, 2005 filings. SCE and the other California utilities constantly seek new ways of reaching CARE customers through community partnerships, direct mailings targeted to specific underserved populations, and other approaches. The utilities frequently exchange information on approaches that prove to be successful.

H. Medical Baseline

PG&E indicates it is willing to develop a process that ensures customers who improperly have been denied medical baseline status receive the benefit of such status retroactively if they subsequently are determined to be qualified. PG&E also is willing to enhance the appeals process for its Medical Baseline Program and is willing to provide an additional compliance filing to demonstrate its ongoing outreach efforts to potentially eligible customers. TURN supports DRA's outreach proposals. SCE in its October 17, 2005 comments addressed the company's aggressive outreach activities that are designed to reach customers that may be eligible to receive Medical Baseline. SCE does not need to enhance its appeals process for Medical Baseline. Customers who complete a Medical Baseline application along with the portion of the application that is completed and signed by a physician are automatically approved for the program. Should a metered customer be erroneously denied enrollment, the account is corrected retroactive to date of the customer's original application. SDG&E and SoCalGas state they are evaluating the gas usage of their Medical Baseline customers to determine if additional allowances are warranted for the winter and, where appropriate, will increase allowances under current program procedures. SCE's present policies allow customers to request additional allowances by calling the customer call center as stated in SCE's Medical Baseline application.¹ An example of a rare instance where SCE has denied a request is when customers seek an allotment for the use of a home spa or pool as therapeutic. SCE's policy is to refer the customer to a medical facility, recommended by the customer's physician, with equipment and facilities

¹ SCE's Medical Baseline application states: "The Standard Medical Baseline Allowance is 16.5 kilowatt-hours of electricity per day, which is in addition to your daily standard Baseline Allocation. If this allowance does not meet your medical needs, please contact SCE at 1-800-447-6620 to discuss additional amounts."

that are prescribed for therapy. In response to additional comments by DRA on SCE's Medical Baseline program, SCE notes that the services provided through SCE's TTY line are available for all programs and services including Medical Baseline. The Medical Baseline brochure and application have been available on-line for several years and SCE utilizes Spanish language outreach in an attempt to reach customers who are eligible for Medical Baseline.

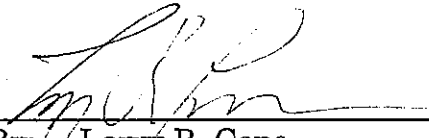
II.

CONCLUSION

SCE appreciates the opportunity to file these Reply Comments and reiterates its request that the Commission adopt its proposals for addressing high gas bills this winter as submitted on September 28, 2005 and October 11, 2005.

Respectfully submitted,

MICHAEL D. MONTOYA
LARRY R. COPE



By: Larry R. Cope

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-2570
Facsimile: (626) 302-7740
E-mail: Larry.Cope@sce.com

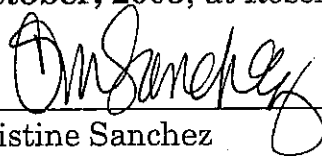
October 19, 2005

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of REPLY OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO COMMENTS ON PROPOSALS TO MITIGATE BILL IMPACTS ON LOW-INCOME CUSTOMERS DURING THE 2005 WINTER on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

- Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.
- Placing the copies in sealed envelopes and causing such envelopes to be delivered by hand or by overnight courier to the offices of the Commission or other addressee(s).
- Placing copies in properly addressed sealed envelopes and depositing such copies in the United States mail with first-class postage prepaid to all parties.
- Directing Prographics to place the copies in properly addressed sealed envelopes and to deposit such envelopes in the United States mail with first-class postage prepaid to all parties.

Executed this 19th day of October, 2005, at Rosemead, California.



Christine Sanchez
Project Analyst
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770