

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Policies,
Procedures and Rules for the Low Income Energy
Efficiency Programs of California's Energy Utilities.

Rulemaking 07-01-042
(Filed May 8, 2007)

REPLY COMMENTS OF THE GREENLINING INSTITUTE

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As Greenlining expressed in its opening comments, we believe that the LIEE proceeding is a great opportunity for this Commission to continue its legacy as a national leader. Furthermore, Greenlining supports any policies that will increase both the program scope and the customer penetration of the LIEE programs.

In order for California to reach its overall goals of energy efficiency and environmental sustainability, the needs of low income communities as unique entities must be recognized, met and the successes measured and analyzed. This is critical to ensuring that the investments made by the many agencies present in the administration of LIEE programs will actually meet the stated objectives of the program.

Increasing Technology Access

While the goal of having every low income household energy efficient by 2015 is ambitious, it is quite attainable. With a commitment of this Commission, the energy utilities and other parties, this proceeding can establish mechanisms by which the LIEE programs can meet this goal through increased technology access to the poor.

Currently LIEE programs do not fully meet the energy efficiency needs of low income customers. While they provide necessary services, the programs as they stand now do not provide the scope of programming that is required to have full penetration by all qualifying low income households. In order to bring all low income customers into the LIEE programs, the programs themselves must provide opportunities for advanced energy technologies to be introduced into communities on both a large and small scale.

Households themselves should have access to these technologies such as solar paneling at prices that are reasonable and reflective of the financial resources these families have at their disposal. This is a necessity both for the energy usage of low income families to be less burdensome to their actual energy sources and less burdensome to their pockets. Greenlining once again affirms the importance of cost savings remaining a top priority of any LIEE programs. Nothing will contribute to maintaining and increasing savings for low income families as increases in technology access will.

Increasing Program Funding

Another area that Greenlining has stated its position is regarding the need for increased program funding. In their last comments, the energy utilities each provided projections of the funding needed for providing services to low income customers

through the LIEE programs. For example, PG&E projects that its estimated annual cost is \$261,000,000 for treating 195,000 customers annually by 2015.

Greenlining believes that the number of customers that are treated annually needs to be increased. Using PG&E as a model, Greenlining supports program funding that will allow for the administration of current programs to more than 250,000 customers along with an increase in services and scope for those 250,000 customers.¹

One of the areas that we believe calls for this increase in funding is in the above mentioned need for greater technology access. Along with greater access, Greenlining also believes this increase in funding is warranted by a need for more innovation and development that should be a key priority of energy efficiency programs. Without the further innovation of technology and methods along with job growth, energy efficiency will never reach the needed scope for California to meet its broader goals. As a national leader poised to be a global leader California's energy efficiency programs must have: clearly stated goals and objectives, clear definitions for what the scope of these programs are and complete funding in order to meet those goals and objectives and serve those households falling within the determined definitions.

¹ Please see Section II, #9 of "Comments of Pacific Gas and Electric Company on the Scoping Ruling for the Commissioner's Rulemaking on the Low Income Energy Efficiency Programs of California's Energy Utilities."

Dated: May 8, 2007

Respectfully submitted,

_____/s/_____

Robert Gnaizda
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of:

COMMENTS OF THE GREENLINING INSTITUTE ON DRAFT DECISION

on all known parties to the above-captioned proceedings by mailing a properly addressed copy by first-class mail with postage prepaid, transmitting a facsimile copy, and/or transmitting an electronic copy to each party named in the official service list as maintained on the California Public Utilities Commission's web page.

Executed on May 8, 2007 at Berkeley, California.

/s/

Mark Rutledge

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