

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
(January 25, 2007)

**DISABILITY RIGHTS ADVOCATES REPLY COMMENTS ON LIEE
PROGRAM OBJECTIVES AND GOALS**

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I. INTRODUCTION

Disability Rights Advocates (“DisabRA”) takes this opportunity to briefly address the Comments submitted by the other parties involved in this proceeding. DisabRA is pleased that the majority of the parties support and value the socio-economic objectives of the LIEE program. DisabRA has a few specific concerns with some of the proposed definitions for the term “energy efficient.” DisabRA further believes that effective outreach is vital to meeting the proposed goal statement.

II. DISABILITY RIGHTS ADVOCATES IS PLEASED BY THE SUPPORT FOR THE SOCIO-ECONOMIC OBJECTIVES OF THE LIEE PROGRAM.

DisabRA recognizes and appreciates PG&E and SCE’s support for the socio-economic aspects of the LIEE program. Both PG&E and SCE understand that the LIEE program has included and should continue to include “non-energy benefits” for the low income customer. Such non-energy benefits include affordability, reduction of energy burden, equity and health, safety and comfort.¹

DisabRA agrees with PG&E that, though the LIEE program is an energy efficiency program, the utilities still should “place a high value on the non-energy benefits associated with the LIEE program.”² As discussed in its initial Comments, DisabRA is aware that the proposed program objectives may compete with each other at a household level (i.e. health, safety and comfort objectives versus cost-effectiveness objectives).³ However, DisabRA concurs with PG&E’s statement that the “program

¹ The “non-energy” benefits discussed in the utilities’ comments implicate mostly the social objectives of LIEE, namely health, safety and comfort as well as equity, because these are most likely to come into conflict with the other objectives. DisabRA notes that increased affordability of energy and decreased energy burden for low income customers are other non-energy benefits.

² See The Comments of Pacific Gas and Electric Company on the Scoping Ruling For the Commission’s Rulemaking on the Low Income Energy Efficiency Program of California’s Energy Utilities (“PG&E Comments”), p.4.

³ Comments of Disability Rights Advocates on the LIEE Program Objectives and Goals (“DisabRA Comments”), p. 6.

objectives should be balanced in a way that there are societal benefits as well as energy saving benefits.”⁴

Similarly, DisabRA commends SCE for its support of the social aspects of the LIEE program and its recognition of the concerns of vulnerable customers.⁵ SCE, like PG&E, understands that the non-energy benefits are what set the LIEE program apart from any other energy efficiency programs. SCE is aware that programs such as LIEE were created to promote “equitable access” to energy efficient measures.⁶

DisabRA is disappointed with the Comments of SDG&E and SoCalGas. SDG&E and SoCalGas suggest that the underlying objective of the LIEE program is “the achievement of energy savings and energy efficiency.”⁷ Unfortunately, their position turns the LIEE program into a numbers game in which the main objective is energy savings and cost savings. SDG&E and SoCalGas not only prioritize the need to save money and energy above all else but further recommend that other objectives should “not [be] considered as a separate, unique goal.”⁸ Unsurprisingly, they believe that, as a criterion, cost-effectiveness “will determine how program activities are to be measured and calculated.”⁹ DisabRA emphatically opposes the position of SDG&E and SoCalGas because it misconstrues an extremely important aspect of the program’s purpose: the provision of non-energy benefits. The position adopted by SDG&E and SoCalGas unnecessarily pits cost-effectiveness against non-energy benefits. SDG&E and SoCalGas

⁴ *Id.* at p. 3

⁵ Southern California Edison Company’s Comments Regarding Low Income Energy Efficiency Program Objectives and Goals (“SCE Comments”), p. 4.

⁶ *Id.*

⁷ Joint Opening Comments of San Diego Gas and Electric Company and Southern California Gas Company to the Scoping Ruling for the Commission’s Rulemaking on the Low Income Energy Efficiency Program (LIEE) of California’s Energy Utilities (“SDG&E and SoCalGas Comments”), p. 2.

⁸ *Id.* at 3.

⁹ *Id.* at 7.

fail to understand that, for the majority of households, it is possible to provide health, safety and comfort as well as energy and cost savings. As DisabRA explained in its Comments, while there may be a conflict between these objectives at a household level for *some* households, on a broader system-wide level both cost-effectiveness and non-energy benefits can be harmonized.¹⁰

Finally, DisabRA acknowledges an important consideration raised by a number of the parties: the effect of the LIEE program, particularly its funding, on ratepayers. Funding increases for the LIEE program are likely to come from increased charges to ratepayers. As PG&E noted, this burden will be particularly difficult for low income customers on the cusp of qualifying for LIEE or CARE who currently struggle to pay their energy bills. The parties and the Commission need to remain attentive to this issue as this proceeding moves forward.

III. DISABILITY RIGHTS ADVOCATES RE-ITERATES THAT THE TERM “ENERGY EFFICIENT” BE DEFINED FROM THE PERSPECTIVE OF THE LOW INCOME CUSTOMER.

Most of the parties suggested in their Comments that key terms in the proposed goal statement, including the term “energy efficient,” should be explicitly defined in order to properly implement the goal. Many of the proposed definitions suggest that energy efficiency is not an absolute but rather it ensures that “each treated home is more energy efficient than prior to treatment.”¹¹ DisabRA supports this relative approach. DisabRA, however, strongly opposes the alternate suggested approach to defining energy efficiency: reliance on “target levels of energy savings per home”¹² or “some pre-determined level of efficiency.”¹³ DisabRA expressed concern about such approaches for

¹⁰ DRA Comments, p. 7.

¹¹ PG&E Comments, p. 7; *see also* SDG&E and SoCalGas Comments, p. 5; TURN Comments, p. 6.

¹² PG&E Comments, p. 5.

¹³ SDG&E and SoCalGas Comments, p.5.

defining “energy efficient” in its Comments, explaining that “energy efficient” should be defined from the perspective of the low income customer.¹⁴

As stated in its Comments, DisabRA would define an energy efficient residence as a residence in which energy is made more affordable resulting in either (1) a decrease in actual costs and use of energy; or (2) an increase in health, safety and comfort which may not yield a decrease in actual costs or use of energy, but should be an option which low income customers may choose.¹⁵ Such a definition still maintains the relative approach (i.e. more efficient than before treatment) but does not require that the increased efficiency be used in a particular way (i.e. decreased bills or decreased consumption of energy). This definition would be unique to the LIEE program; however, as PG&E correctly noted that the term “energy efficient” cannot be defined as it is in the non-low income energy efficiency proceeding.¹⁶

IV. DISABILITY RIGHTS ADVOCATES REMAINS CONCERNED ABOUT THE NEED FOR APPROPRIATE OUTREACH EFFORTS IN IMPLEMENTING THE PROPOSED GOAL STATEMENT.

DisabRA agrees with DRA that “[d]eveloping improvement in the efficacy and scope of Outreach and Enrollment processes is essential to delivering program benefits.”¹⁷ DisabRA is acutely aware of the need for outreach regarding the LIEE program, particularly for persons with disabilities.¹⁸ In its Comments, DisabRA supported the proposed goal statement because the goal set forth a target of full

¹⁴ DRA Comments, p. 8.

¹⁵ *Id.* This is consistent with the definition proposed by TURN which also includes considerations of health, safety and comfort; *see* TURN’s Comments, p. 6.

¹⁶ PG&E Comments, p. 5.

¹⁷ Comments of the Division of Ratepayer Advocates on Scoping Ruling Regarding Policies, Procedures and Rules of the Low-Income Energy Efficiency Programs of California’s Energy Utilities (4/27/07), p.8.

¹⁸ Draft Report on Phase 2 Low Income Needs Assessment (September 5, 2006) (hereafter “KEMA Report”), p. 7-14.

penetration for the LIEE program.¹⁹ Full penetration for LIEE would mean reaching those populations which have historically been underserved, including persons with disabilities.²⁰ DisabRA, like DRA, believes that outreach is an issue which deserves particular consideration in the implementation of the proposed goal statement.

DisabRA re-iterates its suggestion that the provision of CFLs to qualified households could serve as an important outreach tool, educating the utilities about their target population and drawing people into the program by providing a tangible benefit.²¹ As DisabRA conceived it, the provision of CFLs would be the first step in providing energy efficiency measures so as to reach more people with energy savings sooner. DisabRA does appreciate DRA's point that "it is impractical to make repeated efforts on an individual residence."²² DisabRA, however, does not wish to close off the provision of CFLs as an outreach tool and immediate energy savings vehicle that can reach many with relative ease. DisabRA requests that the Commission consider an approach similar to that suggested in the KEMA Report: mailing CFLs to areas of high low income incidence with a survey packet.²³ While providing immediate relief to the low income customer and energy efficiency education, this approach would widen the pool of potentially qualifying LIEE households. SCE is planning a general energy efficiency campaign through the use of CFLs and could perhaps simultaneously use it as an outreach tool for the LIEE program.²⁴

¹⁹ DisabRA believes that, in order for full penetration to be meaningful, the target date of 2015 cannot merely be a "placeholder" as some of the utilities suggest. While DisabRA recognizes that there could be reasons developed in the course of this proceeding to change the date, no justification has yet been presented to show that 2015 is not a reasonable goal.

²⁰ KEMA Report, p. 7-14.

²¹ DRA Comments, p. 9.

²² *Id.* at 6.

²³ KEMA Report, p. 7-23.

²⁴ SCE Comments, p. 2.

CERTIFICATE OF SERVICE

I certify that I have, by electronic mail to the parties to which an electronic mail address has been provided, served a true copy of “Disability Rights Advocates Reply Comments on LIEE Program Objectives and Goals” on all known parties on R. 07-01-042.

Dated May 8, 2007, at Berkeley, California.

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