

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

Order Instituting Rulemaking on the	)	
Commission's Proposed Policies and Programs	)	Rulemaking 04-01-006
Governing Post-2003 Low-Income Assistance	)	(Filed January 8, 2004)
Programs	)	

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**REPLY OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO THE  
DIVISION OF RATEPAYER ADVOCATES' RESPONSE TO SCE'S MOTION TO  
EXTEND CERTAIN LOW INCOME ENERGY EFFICIENCY AND CARE PROGRAM  
POLICIES AUTHORIZED IN D.05-10-044 BEYOND THE WINTER INITIATIVE  
PERIOD**

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Dated: **May 18, 2006**

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**I.**

**INTRODUCTION**

Pursuant to Rule 45(g) of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, and the May 16, 2006 e-mail from Administrative Law Judge (ALJ) Steven Weissman granting Southern California Edison Company ("SCE") permission to file a reply by May 18, 2006, SCE hereby submits this reply to the Division of Ratepayer Advocates' ("DRA") response to SCE's *Motion to Extend Certain Low Income Energy Efficiency and CARE Program Policies Authorized in D.05-10-044<sup>1</sup> Beyond the Winter Initiative Period*.

On April 21, 2006, SCE filed its Motion seeking the Commission's authorization to allow SCE to (1) automatically qualify CARE customers for LIEE measures; (2) continue its CARE telephone operator-assisted enrollment and recertification pilot program; and (3) continue its CARE recertification through SCE's automated voice response unit (VRU) pilot program.

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<sup>1</sup> *Interim Opinion Approving Various Emergency Program Changes in Light of Anticipated High Natural Gas Prices in the Winter of 2005-2006*, dated October 27, 2005.

On May 8, 2006, DRA filed its Response to SCE's Motion. DRA does not object to SCE's request to continue its CARE telephone enrollment and recertification processes. SCE appreciates DRA's support. With respect to SCE's request to automatically qualify CARE customers for *all* eligible LIEE measures, DRA recommends that SCE either continue its Winter Initiative practice of automatically qualifying CARE customers for refrigerator replacement and CFLs and requiring income documentation for additional LIEE measures, or apply a census-based targeted method for enrolling LIEE customers, similar to SoCalGas and SDG&E's practices. While SCE continues to believe that extending the automatic qualification approach to *all* LIEE measures (as long as the CARE and LIEE eligibility benchmarks remain at their current level – 200% of federal poverty guidelines) will provide significant program savings while facilitating rapid deployment of LIEE measures to low-income customers, with little risk of fraudulent enrollment, SCE is amenable to DRA's recommendations.

## **II.**

### **SCE URGES THE COMMISSION TO ALLOW SCE TO CONTINUE ITS CARE TELEPHONE ENROLLMENT AND RECERTIFICATION PROCESSES INDEFINITELY**

SCE appreciates DRA's support of SCE's request to continue beyond April 30, 2006 its (1) CARE telephone operator-assisted enrollment and recertification pilot program and (2) CARE recertification through SCE's VRU pilot program. As described in SCE's Motion, SCE has found that these CARE enrollment and recertification process improvements benefit both SCE and its customers by providing a more streamlined process and a unique opportunity for eligible customers to enroll in CARE and/or recertify their eligibility.

However, SCE would like to clarify that its Motion does not seek to only "temporarily" continue these processes as DRA suggests. Rather, SCE views its CARE telephonic enrollment and recertification processes as permanent, and requests the Commission's authorization to continue them indefinitely.

### III.

#### **SCE IS AMENABLE TO DRA’S RECOMMENDATIONS REGARDING QUALIFYING CUSTOMERS FOR LIEE MEASURES**

DRA recommends that SCE either continue its practice of seeking income documentation for LIEE measures other than refrigerators and CFLs, or apply a census-based targeted method for enrolling LIEE customers, similar to that adopted for SoCalGas and SDG&E. DRA expresses concerns about “eliminat[ing] any verification that customers are income eligible for LIEE measures,”<sup>2</sup> and suggests that the census-based targeted method will help allay this concern. As SCE understands, SoCalGas and SDG&E’s “Targeted Self-Certification Enrollment Process” (TSCEP) utilizes census-based targeting and enables LIEE participants to receive all eligible measures by self-certifying their income without providing income documentation.<sup>3</sup> Under the automatic qualification approach requested by SCE’s Motion, CARE customers have already self-certified their eligibility for CARE (and must recertify and are subject to random income verification to remain on the CARE rate), and thus, under the new income guidelines have self-certified their eligibility for LIEE services. As such, SCE believes the incidence of erroneous enrollment under the automatic qualification approach and the self-certification approach would be no different.

SCE believes that extending the automatic qualification approach to *all* eligible LIEE measures satisfies the goal of “increasing installation of LIEE services to qualified customers by simplifying the qualification/enrollment process, while balancing the potential costs to subsidizing customers of erroneously installing LIEE services.”<sup>4</sup> Nonetheless, if the Commission does not feel that automatically qualifying CARE customers for *all* LIEE measures is appropriate at this time, SCE is amenable to DRA’s suggestions. To the extent SCE deems it necessary, SCE will revisit extending the automatic qualification approach to all eligible LIEE

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<sup>2</sup> DRA’s Response, p. 2.

<sup>3</sup> SCE submitted comments in support of SoCalGas and SDG&E’s motion to extend the TSCEP program.

<sup>4</sup> DRA’s Response, p. 3.

measures in its application for 2007-2008 low-income assistance programs funding, to be filed on July 1, 2006.

**IV.**

**CONCLUSION**

For the foregoing reasons, SCE urges the Commission to allow SCE to indefinitely (1) continue its CARE telephone operator-assisted enrollment and recertification pilot program; and (2) continue its CARE recertification through SCE's automated VRU pilot program. While SCE believes that extending the automatic qualification approach to all eligible LIEE measures will allow SCE to continue the accelerated deployment of services and reduce costs, SCE is amenable to DRA's suggestions.

Respectfully submitted,

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May 18, 2006

**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 THE DIVISION OF RATEPAYER ADVOCATES' RESPONSE TO SCE'S MOTION TO EXTEND CERTAIN LOW INCOME ENERGY EFFICIENCY AND CARE PROGRAM POLICIES AUTHORIZED IN D.05-10-044 BEYOND THE WINTER INITIATIVE PERIOD 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 **18th day of May, 2006**, at Rosemead, California.

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