

**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)	A.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	A.08-05-024 (Filed May 15, 2008)
Application of Southern California Gas Company (U 904 G) for Approval of Low-Income Assistance Program and Budgets for Program Years 2009-2011	A.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	A.08-05-026 (Filed May 15, 2008)

PUBLIC REDACTED VERSION

**RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO THE
ADMINISTRATIVE LAW JUDGE'S FIFTH DATA REQUEST**

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Southern California Edison Company (SCE) files this response pursuant to ALJ Thomas' email of September 3, 2008, requesting additional information on the utilities' lighting budgets.

Question 1:

"Each IOU has provided the Commission with 2009-11 lighting budgets. We need the per bulb measure cost, separated between bulb cost and measure installation cost. Take the numbers you provided in Appendix A-2 (or other document) for light bulbs, and break down each aspect of the expense. At a minimum, furnish information breaking apart the purchase cost of each CFL, and the installation and overhead costs. Break down any non-bulb costs at least into the following categories: marketing, administrative, labor, material, transportation of material, and contractor fee per installed CFL. Provide the information in pie chart format, providing actual percentage and dollar amounts as compared to your total proposed CFL budget. If your program proposes CFL giveaways, provide the information both where bulbs are installed and where they are not installed."

SCE's Response:

Through a competitive bid process, SCE bulk purchases CFLs from an importer, and inventory is shipped directly to service providers who deliver program services to customers. SCE does not warehouse the CFLs. As part of the bulk purchase order agreement, the manufacturer guarantees availability of all wattages based on a quarterly forecast from SCE's LIEE program management. Towards this end, the manufacturer reserves stock and/or production capacity specifically for LIEE. This bulk purchase includes three wattages of screw-in CFLs: 13, 20 and 23W. A different price is paid for each size (\$█ for 13W, \$█ for 20W and \$█ for 23W, *excluding tax*).¹ To simplify matters for comparison, SCE has calculated the average purchase price (*including tax*) per bulb to be \$█. This average takes into account the actual proportions of the wattages that have been installed in recent program years, and those currently projected for installation in 2008. This \$█ is the total cost to the LIEE program for the winning vendor to buy, warehouse and ship CFLs to SCE's LIEE contractors on demand. The manufacturer is required to bid on the total cost to supply and ship the bulbs, and is not required to itemize pricing by material, transportation, or other costs, therefore a breakdown of these costs is not available.

In recent program years, including 2008, all CFLs provided by SCE's LIEE program were directly installed by LIEE (CBO and private) contractors. The LIEE contractors are provided a flat fee of \$█ per bulb installed. This fee includes LIEE contractor installation costs such as labor, transportation, and other overheads for installation. SCE does not require LIEE contractors to propose or track costs at a greater level of detail. Thus, the average total cost per bulb installed is \$█ + \$█ = \$█.

For 2009-2011, SCE has requested² to provide CFLs in two ways:

1. The traditional direct install method described above (\$█ purchase + \$█ installation fee = \$█ per bulb). SCE expects 112,600³ bulbs will be installed according to this practice.
2. As a component to an innovative education kit that will contain three CFLs of differing wattages. The wattage mix of the three CFLs in the kit has not yet been determined. These kits will be provided to households by a variety of channels including ZIP7-based whole neighborhood canvassing, at community events, and in some cases mailed directly to qualified households that specifically request the kits. The CFLs provided in the kit are to be installed by customers and therefore no installation fee will be paid. SCE projects that 70% of the CFLs provided in the kits will be installed by customers.⁴ For planning purposes, the same \$█ cost per *purchased* bulb has been used. Because only 70% of the bulbs are projected to be installed, the cost per *installed* bulb will be higher.

¹ These prices are based on the existing Purchase Order, which expires on December 31, 2008. Prices for 2009 and beyond are unknown at this time.

² SCE's Testimony in support of Application 08-05-026, May 15, 2008, on pages 40-41, describes delivery of CFLs within the "Relamping and Porch Light Fixture Replacement" and "Energy Education" sections.

³ Due to a calculation error, this quantity was mistakenly reported in SCE's Testimony, Attachment A-2, as 119,421. As a result, the corrected savings estimates for CFLs in 2009-2011 (annually) are 4,329,760 kWh and 541 kW. Also, due to a calculation error, the proposed annual CFL budget is \$1,205,825 rather than \$1,206,825. (See SCE's Testimony, Attachment A-2.)

⁴ Jackie Berger, "Impacts of Consumer Based Education Based Programs," Applied Public Policy Research Institute for Study and Evaluation, June 17, 2008, p 47.

For purposes of reporting in Appendix A-2 and elsewhere where (i) cost per installed bulb, (ii) cost benefit, or (iii) kWh and kW savings are reported, the average total cost per bulb of a “kit CFL” installed by the customer is assumed to be \$█/70% = \$█. The number of CFLs *installed* from kits is assumed to be (75,243 kits) * (3 CFL/kit) * (70%) = 158,010.

The “Proposed Expenses” column in Attachment A-2 of SCE’s Testimony in A.08-05-026 includes the installation fee and purchase price of the direct installed CFLs, plus the *installed* cost of the kit CFLs. SCE’s comprehensive, integrated approach to managing the LIEE program precludes breaking out other costs such as marketing, administrative, and transportation, and assigning these costs specifically to CFLs. SCE does not separately market or administer the CFL measure.

Please see Appendix A for requested pie charts.

Question 2:

“If the LIEE program were to buy CFLs from the EE upstream lighting program (i.e., post subsidy), what would be the per-bulb price? In responding to this question, please assume that the IOUs will enable the LIEE contractors to purchase CFLs directly in bulk from the manufacturers participating in the upstream lighting program.”

SCE’s Response:

The LIEE contractors can obtain the CFLs at no cost from participating manufacturers in the Upstream Lighting program if the standard incentives are applied. However, there is little incentive to do this, since the manufacturers will just as readily supply them for a price at or less than the Upstream Lighting incentive, regardless of where the funding originates. Therefore, the funds could come directly out of the LIEE program with no price disadvantage. There is no identifiable leverage that can be gained by routing funds through the Upstream Lighting program.

To further address this question it will be helpful to compare and contrast how the Upstream Lighting and LIEE programs deliver CFLs to end users.

SCE’s Upstream Lighting program uses energy efficiency program funds to reimburse CFL manufacturers a per-bulb incentive. The manufacturer first fronts the incentive to the retailer in the form of a reduced wholesale price, decreased by the amount of the incentive. The retailer must pass the money on to the consumer in the form of reduced retail costs. Therefore, the end-use customer gets 100% of the incentive. None of the incentive is pocketed by the manufacturer or retailer. Their profit comes instead from increased retail sales volume. After delivering the products to the retailer, the manufacturer is repaid by SCE for fronting their money on SCE’s behalf in order to fulfill our logistic and policy requirements designed to reduce program administrative costs. The amount of the incentive is not specifically designed to cover all of the manufacturers’ production and warehousing costs. However it is found that when it does, the rate of sales in stores is much higher. SCE reimburses manufacturers the following per-bulb incentives for bare-spiral CFLs:

Up to 799 Lumens (less than 13 Watts average) \$█

800 to 1,099 Lumens (14 Watts average) \$█

1,100 to 1,599 Lumens (20 Watts average) \$█

1.600 Lumens or greater (24 Watts average) \$ [REDACTED]

Based on the wattage mix of CFLs that SCE's LIEE program provides, this works out to an average incentive cost of \$ [REDACTED] per CFL. This level of incentive does not include frequent, on-demand drop shipments of variable small quantities to LIEE contractors, nor does it include receipt, acknowledgement and tracking of orders via the SCE-specific web-based workflow management system (EMAPS) for LIEE. Provision of these additional services would likely require an increase in the \$ [REDACTED] per CFL average incentive amount.

As described above, SCE's LIEE program uses PGC funds to bulk purchase CFLs from a manufacturer selected through a competitive bidding process. SCE pays an average cost of \$ [REDACTED] per bulb for these CFLs. This price includes frequent, on-demand drop shipments of variable small quantities to LIEE contractors. It also includes costs incurred by the vendor to receive, acknowledge and track shipped orders via EMAPS. If funding from the Upstream Lighting program was used to supply the CFLs, additional money from LIEE would likely be needed to pay for these additional costs.

There are two apparent ways in which the procurement and distribution of CFLs for the Upstream Lighting and LIEE programs could be integrated. However, as described below, there is no identifiable advantage to doing so:

1. LIEE contractors buy subsidized CFLs off the shelf at local retail outlets as required. Associated issues in using this method are:
 - a. Subsidized CFLs may often be unavailable in the required wattages at their local retail outlets. Independent retailers cannot be relied upon to ensure availability at all times.
 - b. Contractors tend not to have the up-front funds or space to buy and stock large quantities of product to cover periods of short supply.
 - c. The true cost of the CFLs would include the \$ [REDACTED] average retail incentive offered to the manufacturer, plus whatever the retailer charges. Given the most common retail cost of \$0.99 per bulb, this results in \$ [REDACTED] per bulb, plus the installation fee. Contrast this with \$ [REDACTED] per bulb plus installation via SCE's existing procurement and distribution method.
2. Manufacturers for the Upstream Lighting program accept, fulfill and drop-ship orders from LIEE contractors using Upstream Lighting funding. Associated issues in using this method are:
 - a. Manufacturers must be able to fulfill small and variable orders from LIEE contractors on short notice, and drop-ship those orders to LIEE contractors with which they have no current supplier relationship. Smaller, more frequent orders to multiple LIEE contractors would cost more than the large shipments to the distribution centers of major retailers.
 - b. Manufacturers must be willing to use SCE's comprehensive EMAPS system for order acceptance, placement and fulfillment, as well as invoicing, or SCE and LIEE contractors must create a separate system outside of EMAPS just to manage CFL orders. Creating a separate system would be costly and inefficient.

- c. If Upstream Lighting funds were used, separate tracking and controls would need to be maintained for the LIEE CFLs vs. the non-LIEE CFLs, thereby increasing overall program costs.
- d. CFLs distributed via Upstream Lighting are subject to a different set of EM&V assumptions. Upstream Lighting currently assumes that 90% of the CFLs purchased are immediately installed, whereas 100% of the CFLs directly installed via LIEE are installed, and 70% of bulbs provided through LIEE education kits would presumably be installed.
- e. CFLs installed via LIEE are also subject to different (lower) kWh and kW savings, per the 2005 Low Income Impact Evaluation. LIEE CFLs are assumed to save 16 kWh per year, whereas Upstream Lighting CFLs have wattage-specific savings assumptions that average out to about double the 16 kWh LIEE assumption.

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September 5, 2008

Confidential Appendix A

Public Redacted Version

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 RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO THE ADMINISTRATIVE LAW JUDGE'S FIFTH DATA REQUEST 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.

Executed this **5th day of September 2008**, at Rosemead, California.

/s/ JENNIFER ALDERETE _____

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FILER: SOUTHERN CALIFORNIA EDISON COMPANY
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