





SCE is pleased to provide comments on the Draft Decision, and commends the Commission for its commitment to making the CARE and LIEE programs more effective and efficient. SCE appreciates the Commission's finding that SCE, at this time, does not require an augmentation of its 2006 authorized LIEE budget, but that with the carryover funds available from the 2005 program SCE has sufficient funds to implement its 2006 LIEE program pursuant to Commission directives. SCE also appreciates the Commission's authorization to continue the CARE telephonic enrollment and recertification processes, and its interest in exploring an automatic qualification approach for all eligible LIEE measures.

However, SCE wishes to address some of the matters raised in the Draft Decision. Specifically, SCE would like to clarify its position on the LIEE automatic qualification approach, and requests that the Commission correct certain misstatements in the Draft Decision regarding SCE's CARE telephonic enrollment and recertification processes.

## II.

### COMMENTS

#### **A. Telephonic CARE Enrollment and Recertification**

SCE appreciates the Commission's authorization to continue the CARE telephone operator-assisted enrollment/recertification process and recertification through SCE's Voice Response Unit (VRU) process. These CARE processes will simplify and expedite enrollment and recertification while minimizing costs. The Draft Decision, however, makes certain misstatements regarding these processes.

The Draft Decision states that "SCE requests authority to continue providing CARE enrollment and recertification over the telephone using SCE's Voice Response Unit."<sup>1</sup> While SCE does seek continued authority to use its VRU in connection with the CARE program, the VRU is used only for recertification, not enrollment in CARE. As described in SCE's motion

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<sup>1</sup> Draft Decision, p. 4.

filed on April 21, 2006 (Motion),<sup>2</sup> customers are given the option of recertifying their CARE eligibility using the VRU. If the customer opts to use the VRU to recertify, the customer calls the toll-free number provided on the recertification notice and is prompted by the VRU to answer certain questions regarding eligibility by touching the telephone keypad. If the customer successfully answers the questions, the customer is recertified at that time. Under SCE's other CARE telephonic process – operator assisted telephone enrollment/recertification – customers may both enroll in and recertify for CARE over the telephone. Through outbound calling, a SCE operator contacts those customers who have submitted signed, but incomplete, enrollment or recertification forms. The customer can then provide the SCE operator with the required information in order to complete the enrollment or recertification process. Accordingly, SCE requests that the Commission clarify in the Draft Decision that SCE's VRU is used only for CARE recertification, and that SCE's operator-assisted telephone enrollment/recertification process permits customers to both enroll in and recertify for CARE.

The Draft Decision also states that “SCE used this process [the VRU] through the winter initiative to qualify customers simply and automatically for LIEE refrigerator replacement and compact fluorescent lights (CFLs). SCE asks to continue this program and use it for all LIEE measures.”<sup>3</sup> This is not accurate. While SCE does seek continued use of its VRU for CARE recertification and believes that an automatic qualification approach for all eligible LIEE measures would be beneficial, SCE did not and does not use the VRU to enroll customers in the LIEE program. Rather, LIEE enrollment is conducted on-site by community-based organizations and contractors who assess measure eligibility and collect income documentation from household members. During the winter initiative, the CARE customer listing was merged with demographic information indicating a high concentration of households with income within the guidelines set for CARE and LIEE. CARE customers in these areas would be automatically

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<sup>2</sup> *Motion to Extend Certain Low Income Energy Efficiency and CARE Program Policies Authorized in D.05-10-044 Beyond the Winter Initiative Period.*

<sup>3</sup> Draft Decision, p. 4.

eligible for refrigerators and CFLs. To the extent these measures were needed, the customer was not required to show proof of income, but simply sign a self-declaration form attesting to household size and income. SCE requests that the Commission clarify in the Draft Decision that SCE does not use, and does not propose to use at this time, its VRU to enroll customers in the LIEE program.

**B. LIEE Enrollment**

SCE appreciates the Commission's interest in exploring an automatic qualification approach as a means to simplify the LIEE enrollment process. As the energy needs of low-income customers within SCE's service territory grow, it becomes increasingly important to expedite LIEE services to customers with the most need, especially those low-income customers living in extreme, hot desert climates. An automatic qualification approach will assist in expediting services to such customers while reducing administrative costs.

The Draft Decision allows SCE to continue automatically qualifying CARE customers for refrigerators and CFLs, but does not permit SCE to extend this automatic qualification approach to all eligible measures. SCE's preference, however, is that a uniform approach encompassing all eligible measures be implemented.

SCE wishes to clarify any perceived ambiguity with respect to its request. In SCE's Motion, SCE sought authorization to permit CARE customers to automatically qualify for all eligible LIEE measures. The Division of Ratepayer Advocates (DRA) responded that it did not support the proposal, and suggested instead that SCE either continue to automatically qualify CARE-enrolled customers for only refrigerators and CFLs, or adopt a census-based, self-certification approach like that proposed by SoCalGas and SDG&E. SCE, perceiving a lack of overall support for extending the automatic qualification approach to all eligible measures (as a result of the discussion regarding the proposal at the May 2, 2006 Low Income Oversight Board meeting and DRA's comments), and in the interest of receiving the Commission's authorization to use a standardized approach that would simplify the enrollment process and expedite the

delivery of services to customers while reducing costs, responded that it was amenable to a census-based, self-certification approach. As a result, SCE did not propose a CARE-based automatic qualification approach in its Application for program years 2007-2008.<sup>4</sup>

Accordingly, SCE respectfully requests that if support to implement a CARE-based automatic qualification approach for all eligible measures does not exist at this time, that a standardized self-certification approach encompassing all eligible measures, based on indicators that would predict eligibility for LIEE, be authorized by the Commission. SCE is amenable to employing an approach like SoCalGas and SDG&E's census-based, self-certification approach.<sup>5</sup>

Automatic qualification of CARE customers for only refrigerators and CFLs made sense as a short-term solution during the winter initiative, as these measures can be rapidly deployed and provide immediate energy savings. For the long-term, however, it seems only prudent to employ a uniform approach encompassing all eligible measures rather than one that determines eligibility on a piecemeal basis. Indeed, any costs savings achieved by an enrollment approach that reduces the number of visits to customer homes would be lost with a piecemeal approach.

SCE respectfully requests that the Commission authorize SCE to use a self-certification approach encompassing all eligible measures, and revise the Draft Decision to reflect this. SCE would be prepared to implement this delivery strategy in the remaining months of 2006 and in program years 2007-2008, upon receiving authorization from the Commission.

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<sup>4</sup> A.06-07-001, filed July 3, 2006.

<sup>5</sup> As is the case with the census-based approach used by SoCalGas and SDG&E, under a CARE-based automatic qualification approach, SCE would require CARE customers to sign a declaration self-certifying their eligibility for the LIEE measures prior to installation. Thus, both approaches target customers based on indicators that would predict eligibility and subsequently require customers to self-certify their eligibility rather than verifying income prior to delivery of services.

**III.**

**CONCLUSION**

SCE appreciates the opportunity to comment on the Draft Decision, and requests that the Commission make modifications to the Draft Decision as described above.

Respectfully submitted,

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/s/

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July 31, 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 COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON THE DRAFT DECISION OF ADMINISTRATIVE LAW JUDGE KIM MALCOLM REGARDING THE 2006 LOW INCOME ENERGY EFFICIENCY PROGRAM BUDGETS 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 **31st day of July, 2006**, at Rosemead, California.

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**R.04-01-006**

Monday, July 31, 2006

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**R.04-01-006**

Monday, July 31, 2006

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