

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

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| Application of San Diego Gas & Electric Company (U 902 M) for Approval of Low- Income Assistance Programs for Program Years 2007 and 2008. |))) <hr/> | A.06-06-032 (Filed June 30, 2006) |
| And Related Matters |))))))) <hr/> | A.06-06-033 (Filed June 30, 2006) A.06-06-034 (Filed June 30, 2006) A.06-07-001 (Filed July 3, 2006) |

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) PETITION FOR
MODIFICATION OF DECISION 06-12-038**

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Dated: **March 30, 2007**

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

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| Application of San Diego Gas & Electric Company (U 902 M) for Approval of Low-Income Assistance Programs for Program Years 2007 and 2008. |) | A.06-06-032 (Filed June 30, 2006) |
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**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) PETITION FOR
MODIFICATION OF DECISION 06-12-038**

I.

INTRODUCTION

Pursuant to Rule 16.4 of the California Public Utilities Commission’s (Commission) Rules of Practice and Procedure, SCE respectfully submits this Petition for Modification (Petition) of Decision (D.) 06-12-038, *Order Adopting Utility Budgets for Low Income Energy Efficiency Programs and California Alternate Rate for Energy* (the “Decision” or “D.06-12-038”).¹

Through this Petition, SCE requests that the Commission (1) correct certain typographical and/or mathematical errors in the Decision; (2) modify the Decision to approve

¹ D.06-12-038, dated December 14, 2006.

ratemaking treatment for the Cool Center program as proposed in SCE's Application²; and (3) modify Ordering Paragraph 6 to reflect the Commission's intent to require Energy Division review and approval of measurement and evaluation study proposal requests, contracts or reports only. The requested changes are consistent with the intent of the Commission and will not significantly alter the substance of D.06-12-038.

SCE also respectfully requests expedited treatment of this Petition such that the Commission issues a decision before June 1, 2007, the date when SCE's Cool Center operations are anticipated to begin.

II.

DISCUSSION

A. The Commission Should Correct Typographical and/or Mathematical Errors in the Decision

On January 18, 2007, pursuant to Rule 16.5 of the Commission's Rules of Practice and Procedure, SCE sent a letter to Executive Director Steve Larson requesting correction of certain errors in D.06-12-038.³ Specifically, SCE requested that errors in/on the following be corrected:

- Appendix, Table 1 (errors in LIEE budget line items);
- Appendix, Table 2 (errors in CARE budget line items);
- Page 2 (errors in CARE and LIEE budget totals);
- Page 31 (error in LIEE measurement and evaluation budget);
- Page 50 (error in CARE measurement and evaluation budget); and
- Ordering Paragraph 17 (error in LIEE fundshifting guidelines).

² *Southern California Edison Company's Application for Approval of Low-Income Assistance Programs and Budgets for Program Years 2007 and 2008*, A.06-07-001, filed July 3, 2006 (SCE's "Application"), and accompanying *Testimony of Southern California Edison Company in Support of Application for Approval of Low-Income Assistance Programs and Budgets for Program Years 2007 and 2008*, dated July 3, 2006 and entered into the record September 22, 2006 (SCE's "Testimony").

³ The letter is attached hereto as Attachment A.

On January 29, 2007, Administrative Law Judge (ALJ) Kim Malcolm sent an email directing the parties to file a petition for modification to request corrections to the Decision. ALJ Malcolm noted that she would have “no objection to SCE simply attaching its letter to the petition [for modification].” By this Petition, SCE renews the requests made in its January 18 letter. This Petition also slightly adjusts SCE’s previously requested corrections to the LIEE budget to account for SCE’s new request to remove Cool Center funding from LIEE (described in more detail below).

1. Appendix, Table 1 (LIEE Budget) Should Be Corrected

Appendix, Table 1 of the Decision contains errors in the LIEE budget line items for “M&E” and “Total LIEE Program Cost.”

First, the line item for “M&E” mistakenly authorizes \$270,000 for both 2007 and 2008. It should be \$260,000 per year. D.06-12-038 at pages 30-31 approves the following LIEE M&E funding:

\$180,000 for the Impact Evaluation study
\$250,000 for a Market Characterization study
\$90,000 for labor and study/data management
= \$520,000 (or \$260,000 per year).

Second, the “Total LIEE Program Cost” line item should be adjusted to \$32,043,290 in 2007 and \$32,043,290 in 2008 to account for the corrections to M&E and the removal of \$556,000 per year of Cool Center program funding (discussed below).

SCE’s requested corrections to Appendix, Table 1 are provided in Attachment B hereto.

2. Appendix, Table 2 (CARE Budget) Should Be Corrected

Appendix, Table 2 of the Decision contains errors in the CARE budget line items “Other Outreach,” “Processing, Certification and Verification,” “Bill System/Programming,” “Total Program Costs,” and “Total Program Costs and Customer Subsidies.”

First, the line item for “Other Outreach” provides for only \$1,145,000 in 2008. SCE’s Application requested \$1,450,000 in 2008, which was approved in D.06-12-038.⁴

Second, the line item for “Processing, Certification and Verification” provides for only \$678,000 in 2008. It should be \$928,000, as the draft decision was modified to approve all requested CARE administrative funding.⁵

Likewise, the line item for “Bill System/Programming” was not modified from the draft decision. Instead of \$700,000, it should be \$950,000 in 2008.⁶

Fourth, “Total Program Costs” for 2008 should be adjusted to \$4,199,000 to account for the revisions stated above.

Finally, “Total Program Costs and Customer Subsidies” should be adjusted to \$252,599,000 in 2007 and \$264,599,000 in 2008 to account for the revisions stated above and to account for what appears to be a double counting of CARE administrative subtotals (or “Total Program Costs”).

SCE’s requested corrections to Appendix, Table 2 are provided in Attachment C hereto.

3. The Budget Tables on Page 2 of D.06-12-038 Should Be Corrected

Page 2 of D.06-12-038 contains utility CARE and LIEE adopted budget totals. The totals for SCE’s LIEE program budgets should be corrected to \$32,043,290 in 2007 and \$32,043,290 in 2008 and SCE’s CARE program budgets should be corrected to \$252,599,000 in 2007 and \$264,599,000 in 2008 for the reasons set forth above.

4. Reference to SCE’s Adopted LIEE M&E Budget Should Be Corrected

Page 31 of D.06-12-038 contains the following statement: “With the adjustments made here, SCE’s M&E budget would be reduced to \$270,000.” This should be corrected to

⁴ SCE’s Testimony, Table II-1 and Appendix A; D.06-12-038, pp. 47-49.

⁵ D.06-12-038, pp. 48-49, Finding of Fact 39, Conclusion of Law 36.

⁶ *Id.*

“With the adjustments made here, SCE’s M&E budget would be reduced to \$260,000” for the reasons set forth above.

5. Reference to SCE’s Adopted CARE M&E Budget Should Be Corrected

Page 50 of D.06-12-038 contains the following statement: “SCE proposes \$55,000 for each program year for measurement and evaluation activities.” In fact, SCE proposed \$55,500 for its CARE measurement and evaluation budget, which was approved by the Commission (as shown in Appendix, Table 2 of D.06-12-038).⁷ Accordingly, this statement should be corrected to: “SCE proposes \$55,500 for each program year for measurement and evaluation activities.”

6. Ordering Paragraph 17 Should Be Corrected

Ordering Paragraph 17 currently states: “The utilities may shift funds between LIEE programs so as to promote the efficient and effective implementation of the CARE program but may not shift additional funds to administrative overhead costs, regulatory costs or the costs of studies as set forth herein.” The reference to CARE is an inadvertent error. Consistent with the intent of and the discussion in D.06-12-038, Ordering Paragraph 17 should be corrected to apply to LIEE.⁸ Accordingly, Ordering Paragraph 17 should be corrected to:

The utilities may shift funds between LIEE programs so as to promote the efficient and effective implementation of the **LIEE** program but may not shift additional funds to administrative overhead costs, regulatory costs or the costs of studies as set forth herein.

⁷ SCE’s Testimony, Table II-1 and Appendix A.

⁸ See D.06-12-038, pp. 29, 34-35.

B. The Commission Should Modify the Decision to Approve SCE’s Proposed Ratemaking Treatment for the Cool Center Program

SCE’s Application requested that the Commission continue to allow SCE to record and recover its Cool Center program expenses separately from LIEE or CARE. Consistent with the 2006 Cool Center program’s authorized ratemaking treatment (as filed in Advice 2011-E), SCE’s Application proposed to modify Preliminary Statement, Part FF, Public Purpose Programs Adjustment Mechanism (PPPAM), to record incremental Cool Center program costs (up to the Commission-approved amount).⁹ In D.06-12-038, however, the Commission unexpectedly included SCE’s 2007-2008 Cool Center program funding within SCE’s authorized LIEE budget. In order to avoid confusion and promote the smooth administration of the 2007 and 2008 Cool Center programs, SCE requests that the Commission modify the Decision to treat the Cool Center program as a stand-alone program and approve SCE’s proposed Cool Center ratemaking treatment.

SCE does not believe that the Cool Center program fits neatly into either LIEE or CARE. Cool Centers, as reflected by D.06-12-038, are evolving into a lasting component of the portfolio of low income assistance programs.¹⁰ As such, the program is more appropriately viewed and administered as a stand-alone program. Indeed, the Commission has already acknowledged the difficulty of categorizing Cool Centers: “[s]ubsidies for ... persons [attending Cool Centers] do not fit precisely under the LIEE or CARE rubric, since they are not energy efficient appliances and measures (LIEE) or direct rate assistance to utility customers (CARE).”¹¹ For this reason, SCE believes that the best approach to funding Cool Centers is through separate ratemaking treatment.

Further, the record in this matter does not support the inclusion of Cool Centers within the LIEE program. SCE’s Application discussed its proposed Cool Center program separately

⁹ SCE’s Testimony, 42:22-43:9.

¹⁰ D.06-12-038 directed PG&E to submit a plan for a Cool Center program.

¹¹ D.05-04-052, pp. 18-19.

from its discussion of LIEE or CARE. None of the parties to the proceeding objected to SCE's request to continue its current Cool Center ratemaking policy. Additionally, the draft decision was silent on funding for the 2007-2008 Cool Center program. After SCE filed comments on the draft decision pointing out this omission, the final decision was corrected to include Cool Center funding, but nonetheless remained silent on SCE's proposed ratemaking treatment. Funding of \$556,000 per year for the program was simply added as a line item to the approved LIEE budget. SCE does not believe this was the Commission's intended result. Accordingly, SCE respectfully requests to continue the current ratemaking treatment of Cool Centers – recording and recovering these expenses separately from the CARE and LIEE programs. SCE believes that this will avoid future confusion and facilitate smooth program administration.

Attachment D hereto is a Cool Center budget table reflecting the budget approved by D.06-12-038. SCE proposes that the Commission attach this table to the Appendix to D.06-12-038 as Table 2B.¹²

C. Ordering Paragraph 6 Should Be Modified to Reflect the Commission's Intent to Require Energy Division Review and Approval of Measurement and Evaluation Study Proposal Requests, Contracts or Reports Only

SCE requests that Ordering Paragraph 6 be limited to measurement and evaluation studies of the CARE and LIEE programs consistent with the intent of and discussion in the Decision.

The Decision sets forth the Commission's desire to assure that contracts for utility program studies are fairly solicited and these measurement and evaluation studies are necessary and competently performed. In line with this, in the section of D.06-12-038 entitled "Evaluation and Measurement of Program Results and Processes," the Commission "requires that the utilities

¹² The request to label SCE's Cool Center program budget as Table 2B is in no way intended to draw a connection to SCE's authorized CARE budget (Table 2), but merely a measure to avoid having to renumber the remaining tables in the Appendix.

“receive approval in writing by the Energy Division Director or his designee before issuing a request for proposal which approves the process and specifications of the request and also before signing a contract” and that this process applies only to studies of the CARE and LIEE programs.¹³ Without explanation, however, Ordering Paragraph 6 vastly expands the scope of this Energy Division oversight:

SCE, PG&E, SoCalGas and SDG&E shall receive written approval from the Commission’s Energy Division Director or his designee prior to issuing any request for proposal, awarding any contract to any consultant or issuing any report for LIEE or CARE programs.

This Ordering Paragraph could reasonably be interpreted to require that any and all contracts for vendors, contractors, and Community Based Organizations; monthly reports; annual reports and any other reports or contracts related in any way to the CARE or LIEE programs would first require Energy Division approval. SCE does not believe this was the Commission’s intended result, and therefore respectfully requests that Ordering Paragraph 6 be corrected to reflect the more reasonable process for Energy Division review of measurement and evaluation studies outlined in the Decision.

SCE agrees with the observations made by San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas) in their joint Petition for Modification of D.06-12-038 filed on February 20, that requiring Energy Division approval of all contracts, reports and proposals related to CARE or LIEE would cause undue burden on the already limited time and resources of the utilities and Commission staff; unnecessarily delay the implementation of much-needed assistance to low-income customers; and constitute micromanagement by the Commission.

¹³ D.06-12-038, pp. 20-21. (In its discussion of “Evaluation and Measurement of Program Results and Processes”, the Commission states the following: “In our consideration of utility program studies, we have a responsibility to assure funds are spent according to policy objectives and priorities ... Currently, Commission staff, rather than the utilities, is responsible to oversee the evaluation and measurement studies for utility energy efficiency programs except those for low income customers ... we state our commitment here to assuring the contracts are fairly solicited and the studies are both needed and competently performed. To that end, we direct the utilities to receive approval in writing by the Energy Division Director or his designee before issuing a request for proposal which approves the process and specifications of the request and all before signing a contract. This process would apply to any and all studies for the CARE and LIEE programs.”)

For these reasons, consistent with SoCalGas and SDG&E's proposed language, SCE proposes to modify Ordering Paragraph 6 as follows:

“SCE, PG&E, SoCalGas and SDG&E shall receive written approval from the Commission's Energy Division Director or his designee prior to issuing any request for proposal, awarding any contract to any consultant or issuing any report **for measurement and evaluation studies** for LIEE or CARE programs.”

The proposed modification is consistent with the intent of and discussion in the Decision, and therefore SCE respectfully requests that the Commission modify Ordering Paragraph 6 accordingly.

III.

CONCLUSION

For the foregoing reasons, SCE respectfully requests that the Commission modify D.06-12-038.

Respectfully submitted,

MICHAEL D. MONTOYA
STACIE SCHAFFER

/s/ STACIE SCHAFFER

By: Stacie Schaffer

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March 30, 2007

Attachment A

January 18, 2007 Letter to Executive Director Steve Larson

January 18, 2007

Mr. Steve Larson
Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

Re: Correction of Typographical Errors in Decision (D.) 06-12-038

Dear Mr. Larson:

Pursuant to Rule 16.5 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, Southern California Edison Company (SCE) respectfully requests correction of the following typographical errors in Decision (D.) 06-12-038, *Order Adopting Utility Budgets for Low Income Energy Efficiency Programs and California Alternate Rate for Energy*:

1. Appendix, Table 1 contains typographical errors in the LIEE budget line items for "M&E" and "Total LIEE Program Cost."

First, the line item for "M&E" mistakenly authorizes \$270,000 for both 2007 and 2008. It should be \$260,000 per year. D.06-12-038 at pages 30-31 approves the following LIEE M&E funding:

\$180,000 for the Impact Evaluation study
\$250,000 for a Market Characterization study
\$90,000 for labor and study/data management
= \$520,000 (or \$260,000 per year).

Second, the "Total LIEE Program Cost" line item should be adjusted to \$32,599,290 in 2007 and \$32,599,290 in 2008 to account for the corrections to M&E.

Corrections to Appendix, Table 1 are provided in Attachment A hereto.

2. Appendix, Table 2 contains typographical errors in the CARE budget line items "Other Outreach," "Processing, Certification and Verification," "Bill System/Programming," "Total Program Costs," and "Total Program Costs and Customer Subsidies."

First, the line item for "Other Outreach" provides for only \$1,145,000 in 2008. SCE's Application requested \$1,450,000 in 2008, which was approved in D.06-12-038. (SCE's Testimony, Table II-1 and Appendix A; D.06-12-038, pp. 47-49.)

Second, the line item for “Processing, Certification and Verification” provides for only \$678,000 in 2008. It should be \$928,000, as ALJ Malcolm’s Proposed Decision was modified to approve all requested CARE administrative funding. (D.06-12-038, pp. 48-49, Finding of Fact 39, Conclusion of Law 36.)

Likewise, the line item for “Bill System/Programming” was not modified from the Proposed Decision. Instead of \$700,000, it should be \$950,000 in 2008. (*Id.*)

Fourth, “Total Program Costs” for 2008 should be adjusted to \$4,199,000 to account for the revisions stated above.

Finally, “Total Program Costs and Customer Subsidies” should be adjusted to \$252,599,000 in 2007 and \$264,599,000 in 2008 to account for the revisions stated above and to account for what appears to be a double counting of CARE administrative subtotals (or “Total Program Costs”).

Corrections to Appendix, Table 2 are provided in Attachment A hereto.

3. Page 2 of D.06-12-038 contains utility CARE and LIEE adopted budget totals. The totals for SCE’s LIEE program budgets should be corrected to \$32,599,290 in 2007 and \$32,599,290 in 2008 and SCE’s CARE program budgets should be corrected to \$252,599,000 in 2007 and \$264,599,000 in 2008 for the reasons set forth above.
4. Page 31 of D.06-12-038 contains the following statement: “With the adjustments made here, SCE’s M&E budget would be reduced to \$270,000.” This should be corrected to “With the adjustments made here, SCE’s M&E budget would be reduced to \$260,000” for the reasons set forth above.
5. Page 50 of D.06-12-038 contains the following statement: “SCE proposes \$55,000 for each program year for measurement and evaluation activities.” In fact, SCE proposed \$55,500 for its CARE measurement and evaluation budget, which was approved by the Commission (as shown in Appendix, Table 2 of D.06-12-038). (SCE’s Testimony, Table II-1 and Appendix A.) Accordingly, this statement should be corrected to: “SCE proposes \$55,500 for each program year for measurement and evaluation activities.”
6. Ordering Paragraph 17 currently states: “The utilities may shift funds between LIEE programs so as to promote the efficient and effective implementation of the CARE program but may not shift additional funds to administrative overhead costs, regulatory costs or the costs of studies as set forth herein.” The reference to CARE is an inadvertent error. Consistent with the intent of and the discussion in D.06-12-038, Ordering Paragraph 17 should be corrected to apply to LIEE. (D.06-12-038, pp. 29, 34-35.) Accordingly, Ordering Paragraph 17 should be corrected to: “The utilities may shift funds between LIEE programs so as to promote the efficient and effective implementation of the LIEE program but may not shift additional funds to administrative overhead costs, regulatory costs or the costs of studies as set forth herein.”

For the foregoing reasons, SCE respectfully requests that the typographical errors in D.06-12-038 be corrected as set forth herein.

Very truly yours,

Stacie Schaffer

cc: Service List for A.06-06-032, et al.
Commissioner Dian Grueneich
Administrative Law Judge Kim Malcolm
Hazlyn Fortune, CPUC Energy Division

SS:ss:Law#1323999

Attachment(s)

Attachment B

Revised Appendix, Table 1 (SCE's LIEE Budget)

Table 1

SCE 2007-2008 LOW-INCOME ENERGY EFFICIENCY PROGRAM BUDGETS

| L.I.E.E. Cost Category | 2006 | | 2007 | | 2008 | | 2007 Authorized | 2008 Authorized |
|------------------------------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------------|-------------------|
| | Authorized | Proposed | Proposed | Proposed | Proposed | Authorized | | |
| Energy Efficiency | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Gas Appliances | \$ 20,971,520 | \$ 26,080,869 | \$ 26,080,869 | \$ 26,080,869 | \$ 26,080,869 | \$ 26,080,869 | \$ 26,080,869 | \$ 26,080,869 |
| Electric Appliances | \$ 394,450 | \$ 585,011 | \$ 585,011 | \$ 585,011 | \$ 585,011 | \$ 585,011 | \$ 585,011 | \$ 585,011 |
| Weatherization | \$ 2,817,745 | \$ 1,856,227 | \$ 1,856,227 | \$ 1,856,227 | \$ 1,856,227 | \$ 1,856,227 | \$ 1,856,227 | \$ 1,856,227 |
| Outreach & Assessment | \$ 518,400 | \$ 429,736 | \$ 429,736 | \$ 429,736 | \$ 429,736 | \$ 429,736 | \$ 429,736 | \$ 429,736 |
| In-Home Energy Education | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Education Workshops | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| Other Program Activities | | | | | | | 260,000 | |
| Training Center | \$ 20,000 | \$ 150,000 | \$ 150,000 | \$ 150,000 | \$ 150,000 | \$ 150,000 | \$ 150,000 | \$ 150,000 |
| Inspections | \$ 555,000 | \$ 232,675 | \$ 232,675 | \$ 232,675 | \$ 232,675 | \$ 232,675 | \$ 232,675 | \$ 232,675 |
| Advertising | \$ 15,000 | \$ 201,310 | \$ 201,310 | \$ 201,310 | \$ 201,310 | \$ 201,310 | \$ 201,310 | \$ 201,310 |
| M&E | \$ 195,000 | \$ 331,250 | \$ 331,250 | \$ 331,250 | \$ 331,250 | \$ 331,250 | \$ 331,250 | \$ 331,250 |
| Regulatory Compliance | \$ 70,000 | \$ 75,000 | \$ 75,000 | \$ 75,000 | \$ 75,000 | \$ 75,000 | \$ 75,000 | \$ 75,000 |
| Other Administration | \$ 1,772,885 | \$ 3,112,922 | \$ 3,112,922 | \$ 3,112,922 | \$ 3,112,922 | \$ 3,112,922 | \$ 3,112,922 | \$ 3,112,922 |
| Cost Center | | | | | | | \$556,000 | |
| Oversight Costs | \$ 70,000 | \$ 45,000 | \$ 45,000 | \$ 45,000 | \$ 45,000 | \$ 45,000 | \$ 45,000 | \$ 45,000 |
| PUC Energy Division | \$ 27,400,000 | \$ 33,100,000 | \$ 33,100,000 | \$ 33,100,000 | \$ 33,100,000 | \$ 33,100,000 | \$ 33,100,000 | \$ 33,100,000 |
| Total L.I.E.E. Program Cost | | | | | | | 32,043,290 | 32,043,290 |

Attachment C

Revised Appendix, Table 2 (SCE's CARE Budget)

Table 2

SCE 2007 CARE BUDGETS

| CARE Budget Categories | 2006 Authorized | 2007 Proposed | 2008 Proposed | 2007 Authorized | 2008 Authorized |
|--|-----------------|----------------|----------------|-----------------|-----------------|
| Outreach | | | | 1,450,000 | |
| Capitation Fees | | \$ 100,000 | \$ 100,000 | \$ 100,000 | \$ 100,000 |
| Other Outreach | | \$ 1,425,000 | \$ 1,425,000 | \$ 1,425,000 | \$ 1,425,000 |
| Subtotal Outreach | \$ 1,633,000 | \$ 1,525,000 | \$ 1,525,000 | \$ 1,525,000 | \$ 1,525,000 |
| Automatic Enrollment | \$ 60,000 | \$ 30,000 | \$ 30,000 | \$ 30,000 | \$ 30,000 |
| Cool Centers | \$ 95,000 | N/A | N/A | N/A | N/A |
| Processing, Certification and Verification | \$ 600,000 | \$ 873,000 | \$ 928,000 | \$ 873,000 | \$ 873,000 |
| Bill System/Programming | \$ 557,000 | \$ 875,000 | \$ 950,000 | \$ 875,000 | \$ 875,000 |
| Measurement and Evaluation | \$ 58,000 | \$ 55,500 | \$ 55,500 | \$ 55,500 | \$ 55,500 |
| Regulatory Compliance | \$ 50,000 | \$ 70,000 | \$ 80,000 | \$ 70,000 | \$ 80,000 |
| Other Administration | \$ 1,063,000 | \$ 665,500 | \$ 500,500 | \$ 665,500 | \$ 500,500 |
| CPUC Energy Division Staff | \$ 82,000 | \$ 105,000 | \$ 105,000 | \$ 105,000 | \$ 105,000 |
| Total Program Costs | \$ 4,198,000 | \$ 4,199,000 | \$ 4,199,000 | \$ 4,199,000 | \$ 4,199,000 |
| Total Customer Subsidies | \$ 168,100,000 | \$ 248,400,000 | \$ 260,400,000 | \$ 248,400,000 | \$ 260,400,000 |
| Total Program Costs and Customer Subsidies | \$ 172,298,000 | \$ 252,599,000 | \$ 264,599,000 | \$ 252,599,000 | \$ 264,599,000 |

Attachment D

Proposed Table 2B (SCE's Cool Center Budget)

Table 2B

SCE 2007-2008 COOL CENTER BUDGETS

| Cool Center Budget Categories | 2007 Proposed | 2008 Proposed | 2007 Authorized | 2008 Authorized |
|-------------------------------|-------------------|-------------------|-------------------|-------------------|
| Oversight | \$ 73,304 | \$ 73,304 | \$ 73,304 | \$ 73,304 |
| Administrative | \$ 122,000 | \$ 122,000 | \$ 122,000 | \$ 122,000 |
| Utilities | \$ 41,178 | \$ 41,178 | \$ 41,178 | \$ 41,178 |
| Supplies | \$ 18,882 | \$ 18,882 | \$ 18,882 | \$ 18,882 |
| Outreach / Education | \$ 57,142 | \$ 57,142 | \$ 57,142 | \$ 57,142 |
| Transportation | \$ 47,142 | \$ 47,142 | \$ 47,142 | \$ 47,142 |
| Personnel / Staff | \$ 175,400 | \$ 175,400 | \$ 175,400 | \$ 175,400 |
| Refreshments | \$ 20,952 | \$ 20,952 | \$ 20,952 | \$ 20,952 |
| Measurement & Evaluation | \$ 40,000 | \$ 40,000 | \$ 40,000 | \$ 40,000 |
| Total | \$ 596,000 | \$ 596,000 | \$ 556,000 | \$ 556,000 |

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 SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) PETITION FOR MODIFICATION OF DECISION 06-12-038 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 **30th day of March, 2007**, at Rosemead, California.

/s/ HENRY ROMERO

Henry Romero
Project Analyst
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770

A.06-06-032

Friday, March 30, 2007

CASE ADMINISTRATION
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ROSEMEAD, CA 91770
A.06-06-032

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Friday, March 30, 2007

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