

**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 (Filed January 25, 2007)
_____)	
Southern California Edison Company's (U 338-E) Application for Approval of SCE's "Change A Light, Change The World," Compact Fluorescent Lamp Program.)	Application 07-05-010 (Filed May 10, 2007)
_____)	

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY COMMENTS
REGARDING AB 2104 IMPLEMENTATION AND RENTER ACCESS TO LOW
INCOME ENERGY EFFICIENCY PROGRAMS**

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Dated: **June 15, 2007**

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I.

INTRODUCTION

Pursuant to Administrative Law Judge (ALJ) Kim Malcolm’s Ruling¹ issued on May 22, 2007 in Rulemaking (R.) 07-01-042 Regarding Policies, Procedures and Rules for the Low Income Energy Efficiency Programs of California’s Energy Utilities, Southern California Edison Company (SCE) replies to the comments of A World Institute for a Sustainable Humanity (A

¹ *Administrative Law Judge’s Ruling Addressing Renter Access to Low Income Energy Efficiency Programs, AB 2104 Implementation Regarding Tenants of Master-Meter Customers and Consideration of LIEE Furnace Programs and Natural Gas Appliance Testing.*

WISH) regarding AB 2104 implementation and renter access to the Low Income Energy Efficiency (LIEE) program.

II.

COMMENTS

SCE is pleased that A WISH shares some of the same goals and objectives of SCE and many of the other parties to this proceeding. For instance, SCE agrees with A WISH that the Commission should work closely with utilities, the Department of Weights & Measures, master-metered customers and mobile home park managers to develop a solution that ensures that CARE discounts are passed along to sub-metered tenants.

SCE, however, wishes to clarify a comment made by A WISH.

A WISH commented that it “*continues to believe that ‘cream skimming weatherization,’ for example installing only several compact florescent bulbs (“cfls”) in a dwelling unit and nothing else, misses the mark in terms of the energy savings and environmental benefits that could and should be delivered, particularly where the unit or house may not be revisited for ten years.*”²

Under the LIEE program, a treated home must receive all feasible measures for which it qualifies.³ Therefore “cream skimming weatherization” is not permitted under the LIEE program and the use of that term mischaracterizes the comprehensive treatment requirement of LIEE. Further, a home reached through SCE’s proposed “Change a Light, Change the World” CFL Program⁴ will not be considered a “treated” home under LIEE; customers receiving CFLs through the CFL Program will not fall under the “ten year” rule. To the extent a household is eligible for LIEE measures it can receive those measures under the separate LIEE program delivery mechanism.

² *Comments on Renter Access and AB 2104 Implementation Issues by A World Institute for a Sustainable Humanity*, filed June 4, 2007, p. 1.

³ In some circumstances, a household may only be eligible for CFLs under the LIEE program.

⁴ A.07-05-010, filed May 10, 2007.

III.

CONCLUSION

SCE appreciates the opportunity to submit these reply comments.

Respectfully submitted,

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/s/ STACIE SCHAFFER

By: Stacie Schaffer

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June 15, 2007

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) REPLY COMMENTS REGARDING AB 2104 IMPLEMENTATION AND RENTER ACCESS TO LOW INCOME ENERGY EFFICIENCY PROGRAMS 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 **15th day of June, 2007**, at Rosemead, California.

/s/ SARA CARRILLO

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