

**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)

**RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO THE
ADMINISTRATIVE LAW JUDGE'S RULING SEEKING FURTHER INFORMATION
ON LARGE INVESTOR-OWNED UTILITIES' 2009-2011 LOW INCOME ENERGY
EFFICIENCY/CARE APPLICATIONS**

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Dated: **June 27, 2008**

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I.

INTRODUCTION

Pursuant to the *Administrative Law Judge’s Ruling Seeking Further Information on Large Investor-Owned Utilities’ 2009-2011 Low Income Energy Efficiency/CARE Applications*, dated June 17, 2008 (ALJ Ruling), Southern California Edison Company (SCE) responds to the ALJ Ruling’s “Questions for SCE” and “Questions for all IOUs” regarding SCE’s low-income assistance programs application, A.08-05-026.

II.

SCE'S RESPONSE

A. SCE's Responses to "Questions for SCE"

Question 11: Your application indicates the following changes in LIEE measures:

<i>SCE 2009</i>	<i>SCE 2008 authorized</i>
<i>850 room AC units, 4000 central AC</i>	<i>1011 room, 1783 central</i>
<i>8000 evap. coolers</i>	<i>6710</i>
<i>20,000 refrigerators</i>	<i>16,913</i>
<i>277,431 CFLs</i>	<i>194,127</i>
<i>1375 homes weatherized</i>	<i>1336</i>
<i>75,000 energy education</i>	<i>47,135</i>
<i>100 heat pumps</i>	<i>192</i>
<i>2475 torchiere lamps</i>	<i>0</i>
<i>1200 pool pumps</i>	<i>213</i>
<i>418 furnaces</i>	<i>0</i>

a) *Please explain why the number of CFLs installed will significantly increase over time, and whether this increase is consistent with the following statement in D.07-12-051.*

Under our general energy efficiency rules, utility portfolios must include measures that provide long-term, enduring energy savings, and we emphasized this policy in our recent decision, D.07-10-032. Examples include programs for installations of refrigerators, changes in codes and standards, and building modifications. Lighting programs can provide short-term benefits, but the utilities should not rely on CFLs as a primary program focus, especially if the installation and actual use of those products are not assured. D.07-12-051, mimeo, p. 37 (emphasis added).

SCE's Response:

The increase in CFLs that are projected to be installed in 2009 is solely due to an increase in the number of homes that will be treated in 2009. The actual number of CFLs to be installed per home will decline in 2009. In 2007, the number of CFLs installed per home averaged 4.1 and in 2008 SCE is authorized to continue to average 4.1 CFLs per home. SCE's projection for 2009 is 3.7 CFLs per home. SCE's portfolio includes measures that provide long-term enduring energy savings. The proportional increase in CFLs lags behind central air conditioners and pool

pumps, which are expected to see substantially higher installation rates beginning in 2009. SCE proposes to install pool pumps and central air conditioners at a much higher rate in 2009 than the increase in homes served from 2008. SCE notes, however, that many customers in temperate climates are likely to *only* be eligible to receive CFLs in the 2009-2011 period, unless they also have qualifying pre-1993 refrigerators that can be replaced.

b) State whether SCE or its contractors will install each CFL delivered to customers, or whether, by contrast, SCE will give CFLs to customers to install themselves. If the latter, discuss whether energy savings counted for CFLs should be discounted to account for those customers who do not install the lightbulbs.

SCE's Response:

In 2009, every treated household will receive an in-home education kit that includes three CFLs to be installed by the customer. Based on an APPRISE study,¹ 70% of the CFLs received by customers can be expected to be installed. Since installation fees will not be paid to contractors for CFLs delivered through the in-home education kit, installed costs per bulb will be substantially lower than costs for CFLs installed by contractors. In addition to the three CFLs contained in the in-home education kit, customers may have additional CFLs installed by SCE contractors during a home energy assessment. SCE's application, A.08-05-026, reflects appropriate energy and demand savings for installed CFLs and discounted energy and demand savings for CFLs delivered to customers as part of the in-home education kit.

c) Is your proposal for door-to-door delivery of lightbulbs in zip codes with large low income populations (Testimony, page 36) consistent with the Commission decision or the 2005 Impact Evaluation study? Explain.

SCE's Response:

SCE's proposal for door-to-door canvassing is structured to provide energy education and awareness to low-income customers who might otherwise not be treated through LIEE due to ineligibility for LIEE measures. CFLs are to be included in an energy education kit distributed to customers and will serve as a cost-effective outreach tool for customer education, while

¹ Jackie Berger, "Impacts of Consumer Based Education Based Programs", Applied Public Policy Research Institute for Study and Evaluation, June 17, 2008, p 47.

delivering bill savings and introducing CFL technology to the customer. As part of a segmentation strategy, SCE's proposal targets large concentrations of low-income customers in moderate and temperate climates. In D. 07-12-051² the Commission cites the LIEE portion of the statewide strategic plan as a source containing possible cost-effective methods of delivering the LIEE program to eligible customers. SCE's segment strategy is supported as one of the low-income residential strategies contained in the statewide strategic plan.³

d) Does Table IV-6 (Testimony, page 29) assume savings based on all lightbulbs being installed, or does it discount for CFLs that customers will not install?

SCE's Response:

Table IV-6 of SCE's Testimony reflects appropriate energy and demand savings for installed CFLs and discounted energy and demand savings for CFLs delivered to customers as part of the in-home education kit (which are not installed by SCE's contractors).

e) Please explain the reason for decreases over time in any other measure listed above, or any other measure in Attachment A-2 to your application.

SCE's Response:

SCE's measure forecast for 2009-2011 is based on a combination of RASS and HENS data scaled to 2009 levels and is adjusted for estimated measure acquisitions by low income households through previous LIEE participation and through measure acquisitions external to the LIEE program. The forecast is further scaled by the percentage mix of measures being encountered in households served in SCE's most recent program year. The potential for certain measures (e.g.: room ACs and heat pumps) over the 2009-2011 period was found to be slightly less than what has been forecasted for 2008 due to increased saturation of these measures in low-income homes.

Question 12: You propose to increase the education portion of your LIEE program approximately in the following amounts: from 47,135 to 75,243 energy education sessions in one year. State why you propose the increases and explain how increased education efforts will lead to increased energy efficiency as well as safety and comfort. What number/percentage of your

² D.07-12-051, p. 44.

³ California Energy Efficiency Strategic Plan 06-04-010 June 2, 2008, p. viii.

total education-related sessions will result in immediate installation of, or commitments/appointments to install, energy efficiency measures?

SCE's Response:

SCE's increased education efforts over the 2009-11 program period is a direct result of the Commission's LIEE Programmatic Initiative, whereby twenty-five percent of all eligible and willing LIEE customers will be given the opportunity to participate in LIEE programs over the 2009-11 application period. This represents a significant increase in customers served over previous years and is the primary reason for the increase in energy education efforts. SCE's education efforts will include information, instruction and tools on how customers can implement energy efficiency practices in the home and information that will provide increased health, safety and comfort benefits. The recycling of CFLs is one example of an area of focus when educating customers. With respect to how education efforts will tie into measure installations, SCE estimates that 82% of the homes that receive in-home energy education will result in commitments for additional LIEE services.

Question 13: One of your leveraging proposals is to allow current authorized funds used in cooperation with the California New Homes Program (CANHP) to be reserved, or set aside, with CANHP projects that may take years to start/finish, possibly into the next 2012-2014 budget cycle. How do you propose to handle the funding-carryover issues? Are the eligibility requirements you list for CANHP (Testimony, page 56-57) flexible? They seem difficult to meet, but comment on this observation.

SCE's Response:

To be in line with the CANHP project timeline, it will be necessary for SCE to have the flexibility to reserve LIEE funds to be leveraged to close out financial commitments made to builders in the planning and design stages of their housing project. SCE proposes that funds scheduled to be utilized during the 2009-2011 program cycle be tracked as commitments and that SCE have the option of carryover or carryback to cover the commitments. For the reserve to carryover to the next funding cycle, SCE will seek Commission approval. SCE proposes to align the incentives with households that will be occupied by customers meeting LIEE income eligibility requirements. To be eligible for the program, the housing units will need to be

constructed in climate zones that are eligible for central air conditioning replacements under the LIEE program. Homes receiving LIEE funding through the program must be set-aside for homeowners that will meet LIEE income guidelines. SCE recognizes that the duration of the current slump in new home construction could affect participation in the program.

Question 14: Why do you propose to increase your CARE administrative expenses by approximately \$1.3 million (an approximately 30 percent increase for a program that is estimated at 78% penetration)?

SCE's Response:

In an effort to streamline CARE and FERA enrollment processes, provide a more efficient end-to-end process for SCE's low-income customers' enrollment, recertification, and verification experiences, and to remove barriers to maintaining eligible low-income customers, SCE is proposing several IT enhancements within the 2009-2011 program cycle that equate to \$3 million (See Table IV-10 of SCE's Testimony). The proposed projects for 2009-2011 are identified in detail on Pages 83-87 of SCE's Testimony.

Moreover, in order to meet the Commission's requirement to enroll 100% of those customers willing to participate in CARE, SCE is proposing several aggressive multilingual outreach and door-to-door campaigns. Utilization of multilingual media outlets within Southern California is very expensive. This component of SCE's outreach plans for 2009-2011, accounts for approximately \$100,000 of the proposed CARE administrative expense increase.

As SCE's penetration increases, increased costs will be realized to target those hardest to reach customers as more intensive marketing and outreach will be required.

In addition, within the current 2008 program year, SCE has seen more than a 900% increase in enrollment efforts by CARE Capitation agencies. At year end 2007, SCE expended slightly more than \$27,000 to CARE Capitation agencies for more than 2,100 new CARE enrollments. However, as of May 2008, SCE has expended nearly \$270,000 for nearly 19,000 new CARE enrollments. Approximately \$450,000 of SCE's increase in CARE administrative expenses is to make provision for these increased efforts by the community-based organizations participating in SCE's CARE Capitation Program.

Moreover, SCE's increase in CARE administrative expenses reflect the more than \$450,000 increase in proposed Commission administrative costs over the 2009-2011 Program Cycle.

Lastly, in SCE's 2009-2011 Low Income Program Application, SCE has proposed to transfer FERA costs into the CARE budget. Approximately \$200,000 of SCE's increase in CARE Administrative expenses is represented by this request for reallocation.

Question 15: Why do you propose landlord co-payments for LIEE measures (Testimony, page 39)? Is there precedent for such an approach?

SCE's Response:

In proposing to expand the current landlord co-payment requirement⁴ for refrigerators and room air conditioners to include evaporative coolers, central air conditioners and heat pumps, SCE seeks to offer financial incentives to property owners to install energy efficient appliances in eligible low-income tenant housing. These incentives expand the installation of energy efficient appliances in low-income dwellings resulting in bill savings and increased health, safety and comfort benefits for low-income households. In addition, program funds saved through co-payment of measures can be utilized for measures in additional homes. Finally, incentives offered to property owners encourage owner awareness of energy efficient appliances installed in tenant dwellings and increase the cost-effectiveness of the measure.⁵

Question 16: What, if any, new avenues of data sharing for LIEE outreach appear promising (i.e., likely to result in data sharing and LIEE customer enrollment)? (Testimony, page 48.)

SCE's Response:

SCE's CARE program presents the largest opportunity for data sharing with LIEE to increase the installation of energy efficient measures in low-income homes. Through enrollment on CARE, SCE possesses the names, addresses and usage history of approximately 80% of its eligible low income customers. Sharing this data with LIEE will enable more efficient targeted

⁴ D.01-05-033, dated May 3, 2001, Conclusions of Law 16.

⁵ D. 01-12-020 December 11, 2001, p. 40

outreach activities, as well as enable the delivery of measures into households that will gain the most bill savings, thus maximizing the actual cost effectiveness of the measures.

Question 17: Do your WE&T School Program (Testimony, page 59) and Energy Leader Partnership Program (page 60) have LIEE measures associated with them, or are they purely education programs?

SCE's Response:

SCE's WE&T and Energy Leader Partnership Programs are designed to promote energy efficiency in schools and communities in SCE's service territory. Information and marketing material is disseminated to customers on energy efficiency, demand response, LIEE, CARE and other SCE programs. Customers are enrolled and referred to programs of interest. No LIEE measures are directly associated with these two programs.

Question 18: Why do you plan no pilots for 2009-2011 (Testimony, page 64)?

SCE's Response:

Although SCE is not proposing pilots in 2009-2011, SCE is proposing substantial changes to program delivery as described in its testimony regarding integration with DSM programs. Coordination with other programs will expand awareness of LIEE among potentially eligible customers as they receive information on other SCE DSM program offerings. As indicated in SCE's testimony, SCE considered a pilot related to advance metering infrastructure for testing in-home display units for low-income customers, but subsequently determined that it would be preferable to ensure CARE customers are included in SCE's existing plans to test in-home displays for residential customers. For new construction, SCE determined that in lieu of a pilot, it would be preferable to integrate the LIEE program delivery principle of paying the entire incremental cost of higher efficiency central air conditioners for new low income households with the established California New Homes program.

Question 19: Is your fund-shifting proposal limited in any way (e.g., by dollar amount or percentage of total)?

SCE’s Response:

SCE’s fund-shifting proposal is consistent with the flexibility that was permitted as recently as 2006 when fund-shifting was not limited by dollar amount or percentage among budget categories within the LIEE program. SCE’s proposal will promote program continuity in a seamless manner across the three-year funding period and help achieve long term LIEE investments. SCE has requested the ability to commit California New Homes program funds as necessary into the next program cycle beginning in 2012, since many new construction projects require multiple years from the program commitment to construction and installation. While SCE did not propose any fund-shifting limitations in its application, SCE would be agreeable to obtaining written approval from the assigned administrative law judge prior to shifting funds to General Administration or Regulatory Compliance budget categories.

Question 20: How many employees (at the utility, contractors/subcontractors and community based organizations) AND WHAT TYPES OF EMPLOYEES does your LIEE program currently have, and how will these numbers change in 2009, 2010 and 2011 if your budget is approved?

SCE’s Response:

The table below represents the current and estimated counts in 2009, 2010 and 2011 of SCE’s LIEE staff by employee type, and the count of service providers working in the program.

LIEE Utility Staff	2008	2009	2010	2011
Management FTEs	4.96	8.32	8.32	8.32
Non-Management FTE	14.70	23.55	23.55	23.55
Contract Personnel	8	11.22	11.22	11.22
Total	27.66	43.09	43.09	43.09
LIEE Service Providers	2008	2009*	2010*	2011*
CBOs	12	12-14	12-14	12-14
Private Contractors	5	5-7	5-7	5-7
Appliance Vendors	2	1-4	1-4	1-4
Total	19	18-25	18-25	18-25

*Represents incremental increases adjusted for the increased budget

B. SCE's Response to "Questions for all IOUs"

Question 35: The tables in Attachment 1 compare various metrics in your applications across all four IOUs. You will note that the following discrepancies appear among the IOUs; please explain them:

a) The results of SCE's Modified Participant Test for cost effectiveness are far higher than those for the other IOUs. Please explain the discrepancy.

SCE's Response:

SCE's Modified Participant Test results are being revised to correct calculation errors.

b) The IOU's budget increases do not result in comparable increases in energy savings. Please explain.

SCE's Response:

Energy savings forecasts for 2009-2011 are based on different savings estimates than the forecasts for PY2008. For 2009-2011 SCE relied primarily upon savings estimates reported in the 2005 LIEE Impact Evaluation by West Hill (released Dec 19, 2007), with supplementary estimates drawn from other sources (e.g., 2001 LIEE Impact Evaluation by KEMA, DEER, utility engineering estimates, etc.) where appropriate savings were not available in the 2005 Impact Study. In many instances the savings according to the 2005 Impact Study are significantly lower than the savings used for the PY2008 forecast. For example, the 2005 Impact Study estimated 206 kWh/yr savings for an evaporative cooler installed in a single family home, whereas the 2001 Impact Study estimated 308 kWh savings.

In addition to these significant reductions in forecasted per-unit energy savings, the planned 2009-2011 program also contains more expensive, greatly enhanced energy education materials for which SCE is not claiming any direct energy savings.

c) *The ratio of energy savings to dollars budgeted is decreasing over time for PG&E and SDG&E. Please explain.*

SCE's Response:

Not applicable to SCE.

d) *The energy savings per home is decreasing for PG&E. Please explain.*

SCE's Response:

Not applicable to SCE.

e) *The dollars spent per home are increasing for all IOUs. Please explain.*

SCE's Response:

SCE's dollars per home for the 2009-2011 period is virtually the same as the dollars spent per home that was experienced for 2007. SCE is spending more per home in the 2009-2011 period for inspections, outreach and assessment, and in-home education. SCE is spending more on A/C replacements and pool pumps, and less on refrigerators on a per-home basis. The increased outreach and assessment, and in-home education expenditures will increase due to more outreach efforts being conducted than was required in 2007 and the increased focus on education of customers on energy and environmental areas. SCE will be targeting customers in extreme climate areas that are more likely to be eligible for A/C replacements and pool pumps. Fewer homes are likely to have pre-1993 refrigerators in the 2009-2011 period.

Question 36: How do you plan to incorporate the Commission's zero net energy by 2020 new residential construction goal from the Energy Efficiency proceeding into your LIEE program? Give details.

SCE's Response:

SCE considered this issue during the California Energy Efficiency Strategic Plan (CEESP) process. The new construction marketplace is the main opportunity to advance the achievement of the zero net energy by 2020 goal. Although the LIEE program in the past has not operated in the new construction marketplace, SCE determined that some new construction projects do target and set-aside units for qualifying low income customers. SCE has proposed to use \$4 million of the 3-year \$165 million LIEE budget to increase incentives offered within

SCE's California New Homes program for units that are set-aside for low income customers.
Additional information is provided on page 56 of SCE's Testimony.

Respectfully submitted,

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June 27, 2008

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 RULING SEEKING FURTHER INFORMATION ON LARGE INVESTOR-OWNED UTILITIES' 2009-2011 LOW INCOME ENERGY EFFICIENCY/CARE APPLICATIONS 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 **27th day of June, 2008**, at Rosemead, California.

/s/ NAPA UTRAPIROMSUK

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