BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas & Electric Company for Approval of the 2009 – 2011 Low Income Energy Efficiency and California Alternate Rates fro Energy Programs and Budget (U 39 M).	Application 08-05-022 (Filed May 15, 2008)
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Application of Southern California Gas Company (U 904 G) for Approval of Low Income Assistance Programs and Budgets for Program Years 2009 – 2011.	Application 08-05-025 (Filed May 15, 2008)
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RESPONSE OF SOUTHERN CALIFORNIA GAS COMPANY TO THE ADMINISTRATIVE LAW JUDGE'S SECOND RULING SEEKING FURTHER INFORMATION FROM THE LARGE INVESTOR-OWNED UTILITIES' 2009 – 2011 LOW INCOME ENERGY EFFICIENCY/CARE APPLICATIONS

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I. INTRODUCTION

In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission" or "CPUC") and the Administrative Law Judge ("ALJ") Ruling, dated June 25, 2008 ("Ruling") which seeks further information on Southern California Gas Company's ("SoCalGas") Application for Approval of its 2009 – 2001 Low-Income Assistance Programs and Budgets for Program Years 2009 – 2011 ("Application"), SoCalGas provides this response to the questions posed in Appendix A of the Ruling.

II. RESPONSES

1. Regarding the electric/gas split in your Low-Income Energy Efficiency (LIEE) program budget (if you are an electric/gas utility):

a. *Explain the origins of the split, the justification for it, and whether that justification still exists. See, e.g., Decision (D.) 89-07-062, 1989 Cal PUC LEXIS 829, at *59-60 (commencing low-income energy program and directing budget split).*

b. Explain how you calculate the split, and whether it is different from in the past.

c. Should the calculation of the electric/gas split change, e.g., be based on the number of electric/gas customers of the utility, or some other basis other than that currently used?

SoCalGas Response: This question is not applicable to SoCalGas because SoCalGas is a single fuel utility.

2. What is the suitable level of California Alternate Rates for Energy (CARE) penetration given the costs of acquiring customers? Is there a "break point" where the cost of acquiring new customers outweighs the benefits of extending the program universally?

SoCalGas Response:

SoCalGas does not currently have a methodology to determine the cost breaking point for acquiring new CARE customers. SoCalGas' goal is to enroll 100% of its eligible customers who are willing to participate in the program. SoCalGas has found that for every outreach strategy it implements, it gains customers that have not previously enrolled in the CARE program and may have never enrolled through an alternate strategy. During the CARE Joint Utility Quarterly public meeting held on December 4, 2007, the four large investor-owned utilities ("IOUs")[1] discussed the variations in enrollment cost by utility. SoCalGas' enrollment costs ranged from $0 to $30 dollars. SoCalGas continually seeks to identify and implement outreach methods that lower costs per enrollment, leaving room for select higher cost alternatives used to target harder-to-reach customers. Even so, SoCalGas believes that a universal "break point," will prevent the utilities from achieving the Commission's current 100% penetration enrollment for customers wishing to participate in CARE goal.

[1] The other IOUs include San Diego Gas & Electric Company ("SDG&E"), Southern California Edison Company ("SCE"), and Pacific Gas and Electric Company ("PG&E").

a. For example, an estimated 10% of the eligible population for CARE is not willing to participate in the CARE program according to the KEMA Final Report on Phase 2 Low-Income Needs Assessment, http://docs.cpuc.ca.gov/Published/GRAPHICS/73106.PDF. Should the Commission therefore assume that maximum possible penetration is 90 percent?

SoCalGas Response:

SoCalGas appreciates that the CPUC recognizes that 100% penetration is not likely when some customers are not willing to participate in the CARE program. However, SoCalGas is not able to comment on whether 90% is the maximum possible penetration rate based on the KEMA Final Report on Phase 2 Low-Income Needs Assessment and the Annual Joint-Utility CARE Eligibility Rates Study because neither study reflects the new CARE categorical eligibility options adopted by the CPUC in Decision ("D.")06-12-038.[2] Although SoCalGas has not conducted analysis to determine the impact of categorical eligibility on the estimated eligible population, it is likely that this enrollment option may affect the estimated eligible population.

b. The KEMA Final Report also provided recommended penetration targets of 95% for SCE, 90% for PG&E and SDG&E, and 80% for SoCalGas and recommended that the utilities be encouraged to exceed these targets where possible. What is the likelihood of meeting these targets and should the utilities be encouraged or directed to meet these targets?

SoCalGas Response:

Because the KEMA Report does not provide data on how its recommended penetration rates were determined, it is difficult for SoCalGas to make a determination as to whether or not the recommended CARE penetration targets are accurate or achievable.[3]

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[2] D.06-12-038 at p. 69, at Conclusion of Law 35. In its 2007-2008 Application filing, SoCalGas proposed categorical eligibility to provide broader enrollment opportunities to reach more participants and to meet the Commission's goal to enroll 100% of the CARE customers willing to participate. As a result, the Commission approved SoCalGas' proposal and currently, customers are deemed CARE eligible based on their participation in one or more of the following six means-tested programs: Medi-Cal, Food Stamps, Temporary Assistance for Needy Families ("TANF"), Women, Infants, and Children ("WIC"), Healthy Families, and Low-Income Home Energy Assistance Program ("LIHEAP"). SoCalGas recognizes there may be households that are over the CARE income eligibility of up to 200% of Federal Poverty Guidelines ("FPG").

[3] In the Joint Comments of SDG&E and SoCalGas on the draft KEMA Report, the utilities discuss in detail the basis for their concern about the accuracy of the CARE penetration targets recommended in the report, at p.9.

SoCalGas currently has a CARE penetration rate of 79%, and SoCalGas believes it has already enrolled the majority of the eligible-and-willing-to-participate customers into the CARE program. This is so because since the Commission's Rapid Deployment Decision in 2001,[4] SoCalGas has used a number of outreach methods to target different customer groups based on customer analysis using both internal and external databases as resources. SoCalGas pioneered door-to-door canvassing in 2002, direct mailing in 2003, targeted bill inserts in 2004, in-person phone enrollment in 2005, Interactive Voice Recognition ("IVR") phone enrollment in 2006, and third party outreach in 2007. SoCalGas leveraged both internal and external customer assistance programs LIHEAP, Gas Assistance Fund ("GAF"), LIEE, and other utilities to automatically enroll customers into the program. Notwithstanding, SoCalGas will continue its outreach efforts in the hard-to-reach customer segment to strive to achieve the 100% penetration goal, while also focusing on methods to further retain existing customers on the program.

c. According to IOU presentations at the June 2008 Low-Income Oversight Board meeting, current CARE penetration levels are 79% (SoCalGas), 71% (SDG&E), 79% (SCE) and 73% (PG&E, but expected to drop to 70% after recertification of Tier 5 users). Why do these levels differ, and what should the Commission do about it?

SoCalGas Response:

Since 2002, SoCalGas, SDG&E, PG&E and SCE CARE program managers have met on a regular basis to discuss successful outreach, enrollment, and retention practices in order to increase enrollment opportunities for qualified, low-income customers statewide. The IOUs have determined that, generally, due to the differences in demographics and outreach executions within each service territory, some outreach methods may be successful for one utility and unsuccessful for another.

SoCalGas believes the demographic and characteristic differences within each IOUs' service territories have an impact in the IOUs' respective penetration level. And thus, SoCalGas believes the program penetration goals should reflect the willingness of the customer to participate, while maintaining a CARE enrollment policy goal of 100% penetration.

[4] D.01-05-033.

3. The Energy Efficiency program funds "Local Government Partnerships" throughout California. Have the IOUs looked at each of these partnerships as an opportunity to integrate the Energy Efficiency and LIEE programs, and to leverage local government resources in carrying out the LIEE program? Explain.

SoCalGas Response:

Currently, SoCalGas works directly and indirectly with several organizations, which include: 1) county-based non-profit Community Action Partnerships; 2) local government officials (Council Members from many districts); and, 3) city organizations. SoCalGas intends to take a broader approach and integrate its low-income efforts with the general residential Energy Efficiency ("EE") programs, when possible, while working with local government partnerships. SoCalGas' goal is to continue to develop its existing and extensive relationships with local government organizations, assist customers, and provide access to information about SoCalGas' EE and other assistance programs available to customers (e.g., LIEE, CARE, Medical Baseline, and Gas Assistance Fund) simultaneously.

SoCalGas has determined that a key time for collaboration is during customer or partnership education periods. An example is to educate customers and partnership personnel about the EE and low-income assistance programs and determine which program(s) best fits the customer's or constituent's energy needs.

Other potential opportunities that SoCalGas may pursue during the 2009-2011 program cycle include:

- Offer EE and LIEE to customers, where appropriate, based on ZIP Code median income levels.
- Allow employees of participating businesses to apply for rebate offers, as well as, Customer Assistance programs, and make collateral material and applications available at the place of business
- Make EE program materials more comprehensive by including information about the low income programs and other assistance programs offered by the utility/.
- Train city partnership staffs on SoCalGas' EE and assistance programs
- Utilize city operations to disseminate information about EE and other programs to institutions such as libraries and senior centers

These creative strategies present ways for customers served through SoCalGas' partnerships to receive information on services that are specific to their individual needs, as well as allow SoCalGas to pursue further leveraging opportunities.

4. Are there objective metrics by which the Commission can or should analyze the effectiveness of the IOUs' efforts at leveraging (working with outside groups) and integration (combining or synthesizing internal demand side programs)? Some examples might include: money saved, resources shared, consolidation of work efforts, work hours saved, reduction in customer confusion, and/or number of customers served. Explain your position.

SoCalGas Response:

While SoCalGas agrees that possible metrics such as money saved, resources shared, consolidation of work efforts, work hours saved, reduction in customer confusion, and/or number of customers served are clear candidates to analyze the effectiveness of the IOUs' efforts at leveraging, the exact weighting or feasibility of these metrics is very difficult to determine without either sound data or the input of potentially impacted stakeholders. To ensure that these metrics for both leveraging and integration are not only objective but also reliable and meet the needs of interested parties, SoCalGas proposes that the next Joint Utility Quarterly Public Meeting focus on developing a working group to determine both the best method for generating objective, reliable and credible metrics and the best method for obtaining buy-in from key stakeholders and interested parties including utilities, regulators, and community-based organizations.

Appropriately determined metrics help generate greater enrollment, cost savings and move us toward achieving the Programmatic Initiative. Moreover, these metrics must also be reliable and credible from the perspective of key stakeholders including community-based organizations, regulators, utilities and other individuals knowledgeable in the EE arena. While there are indeed multiple avenues to reach these goals of objective, reliable and credible metrics, SoCalGas believes that a research study managed and designed by a study team of interested parties[5] is the most direct

[5] Including representatives from the IOUs, Energy Division, Division of Ratepayer Advocates, CBOs, other low-income assistance agencies, the California Department of Community Services and Development, LIEE contractors and the LIOB,

method of obtaining these metrics. It is for these that SoCalGas favors a discussion of these and related matters at the next Joint Utility Quarterly Public Meeting.

5. Is the information produced in pilot LIEE programs shared among the IOUs? How are the pilots assessed? How are the results of the pilots communicated to other parties? What information is used to determine if a pilot should become a new program element/measure?

SoCalGas Response:

The IOUs have historically worked together very closely on the implementation of new measures. Through this collaborative process, the IOUs share the results of their pilot programs with each other to assist in evaluating and potentially developing an LIEE measure.

SoCalGas' proposed high-efficiency forced air unit furnace pilot will be assessed and evaluated by using bill analysis comparing participant energy consumption before and after the installation of the pilot measure. In order to effectively evaluate the cost/benefits of the pilot, SoCalGas will look to the other IOU's, interested parties and the CPUC to gather their input and incorporate it in the evaluation process.

SoCalGas uses the same criteria used to evaluate potentially viable measures for inclusion in the LIEE program as it does for evaluating whether or not to include a piloted measure in the program portfolio. The two key components used in an evaluation are the energy savings produced by the measure and the costs associated with the purchase and installation of the measure. Additionally other relevant factors used in the evaluation of a measure include: 1) ease of installation, 2) types of non-energy benefits, and 3) any other positive or negative factors associated with the measure.

a. PG&E proposes a pilot to install 1,000 high efficiency clothes washers in single family homes with five people or more whereas SDG&E and SoCalGas propose implementing high efficiency clothes washers as a new measure. Which approach is preferred? Should the measure be treated consistently across utilities?

SoCalGas Response:

Because there are a variety of variables that may affect whether an IOU introduces a new offering as a pilot or new measure, SoCalGas believes that both approaches—offering a pilot and offering as a new measure—are appropriate for the LIEE program design. Some of the factors that may affect whether to introduce a new offering as a pilot or a new measure include: 1) unique customer base, 2) contractor infrastructure, 3) leveraging ability and 4) material cost. A combination of these factors can greatly affect the benefit/cost ratios when assessing the measure from a cost effectiveness standpoint.

SoCalGas believes introducing high-efficiency clothes washers as a new measure is appropriate for SoCalGas because SoCalGas has a planned strategic partnership with the Metropolitan Water District ("MWD"), whereby MWD will contribute $110 per installation, which will reduce the program funding required to install this measure. This proposed measure not only provides the LIEE program and customer with energy savings but also complies with D.06-12-038 which states, "[t]he utilities should begin work on proposals for low-income energy efficiency programs that promote water conservation for the Commission's future consideration."[6]

For these reasons, SoCalGas does not consider that there is a preferred approach to introducing high efficiency clothes washers, and that the measure should not and potentially could not be treated consistently across utilities.

6. PG&E proposes a change in certification for its CARE sub-metered and expanded programs from one to two years. Currently, PG&E's single-family residential customers are required to recertify their eligibility every two years while customers with fixed-income are required to recertify every four years. Are certification rules consistent among the IOUs? Should CARE certification rules be consistent statewide? Should CARE certification rules be consistent for all types of customers and programs? Explain

a. Are certification rules consistent among the IOUs?

SoCalGas Response

The certification rules are not completely consistent among the IOUs. The four IOUs currently recertify their customers every two years; however, fixed-income customers are recertified every four years. Like PG&E, SoCalGas also proposed the same changes to the recertification

[6] D.06-12-038 at COL 6.

period for sub-metered tenants and expanded CARE customers.[7] In addition, SoCalGas and SDG&E were authorized a four-year probability recertification pilot model in D.05-10-044 and D.06-12-03. SoCalGas' CARE probability model calculates the likelihood of a customer's CARE eligibility. Using this model, only customers who are evaluated to be less than 85% likely-to-be-CARE-eligible are required to recertify their eligibility every two years. SoCalGas' CARE customers who are evaluated to be more than 85% likely-to-be-CARE-eligible are automatically extended for an additional two years and, therefore, are required to recertify their eligibility every four years. The four-year recertification requirement has minimized participation barriers, helped retain eligible customers in the program, and improved program effectiveness.

SoCalGas is seeking authorization for "continuation of four year recertification using its probability modeling" in its 2009 – 2011 Application. Likewise, SCE is also proposing implementation of a Probability Model for Verification and Recertification in 2009.

b. Should CARE certification rules be consistent statewide?

SoCalGas Response:

CARE certification rules should be consistent statewide given the program eligibility requirements are the same for all IOUs.

c. Should CARE certification rules be consistent for all types of customers and programs?

SoCalGas Response

SoCalGas does not believe consistent CARE certification rules for all types of customers and programs are the best method to deliver an efficient and effective program. CARE requirements for residential customers, non-profit group living facilities, agricultural employee housing facilities, and non-profit migrant farm worker housing centers are quite different. The recertification rules, on the other hand, need to be consistent with the program requirements.

The purpose of the CARE recertification is to certify CARE customers' program eligibility. The recertification rules should vary among different homogenous groups to maximize program effectiveness. Today, this is the key reason utilities' have different recertification rules for different customer segments based on their current income and future income potential. CARE customers

[7] *See* Testimony of Rudshagen at p.CAR-5 - CAR-6.

who are evaluated to be more than 85% likely-to-be-CARE-eligible are required to recertify every four years. Also, customers on fixed income are certified for four years instead of two to retain the low-income customer on CARE. Customers who qualify for other assistance programs like GAF, LIHEAP, etc. also qualify for CARE, and therefore are automatically enrolled through data exchanges.

Strategically, SoCalGas would like to recertify only customers whose situation may have changed over time such that their household income exceeds the CARE eligibility requirement and avoid unnecessarily recertifying customers who still qualify for the program. SoCalGas is committed to deliver the CARE program at the most cost effective manner and will continually utilize available customer information to exempt customers who are still CARE eligible from recertification.

Given the diversity within residential customers and the different program requirements, this may be an area where the Commission finds that different certificating rules for different homogenous residential groups and different program are warranted.

7. In regard to public housing and Section 8 housing for purposes of LIEE and CARE, D.07-12-051, Ordering Paragraph 4 states: "Propose a process for automatically qualifying all tenants of public housing and tenants of Section 8 housing improving information to public housing authorities." Do all participants in such programs qualify for CARE/LIEE? Is each large IOU treating such participants equally for purposes of eligibility for CARE and LIEE?
Should this public housing and Section 8 treatment be consistent statewide? If so, what proposed approach should be followed? Explain.

a. Do all participants in such programs qualify for CARE/LIEE?

SoCalGas Response:

Not all participants qualify for CARE/LIEE as shown in Attachment 1 which compares 2008-2009 income guidelines for Section 8 and public housing to the CARE/LIEE guidelines by county.

Also, SoCalGas' findings (Attachment 2) from the HUD's Resident Characteristics Reports, November 2007 at https://pic.hud.gov/pic/RCRPublic/rcrmain.asp shows that a minimum of 3% or

10,481 California households living in Public Housing or receiving vouchers within California have incomes at 80% of Area Median Income ("AMI"). 80 % of AMI is more than likely to be outside of the CARE/LIEE income guidelines.

b. Is each large IOU treating such participants equally for purposes of eligibility for CARE and LIEE?

SoCalGas Response:

The IOUs have not reached a consensus on the best method to enroll public housing and Section 8 recipients into the CARE and LIEE programs. However, because the income qualification for these programs is based on the Average Area Medium income instead of the Federal Poverty Level, there are a large number of customers who receive public housing assistance and Section 8 Housing subsidies and whose incomes significantly exceed the CARE income guidelines in the other utility service territories.

Because it appears that the small number of households receiving public housing assistance that do not qualify under the CARE/LIEE guidelines is minimal, SoCalGas and SDG&E have proposed to categorically enroll all public housing and Section 8 participants in CARE and LIEE, thereby automatically qualifying them as directed by the Commission.

c. Should this public housing and Section 8 treatment be consistent statewide?

SoCalGas Response

Given that the AMIs within certain counties and utility service territories are much higher than others, this may be an area where the Commission finds that different approaches for the utilities are warranted.

d. *If so, what proposed approach should be followed? Explain.*

SoCalGas Response

This may be an area where the CPUC finds that different approaches by the utilities are appropriate.

8. Itemize your budgets for marketing/outreach for both CARE and LIEE in the ethnic media in the past two budget cycles and the 2009-2011 cycles. Give type of media (e.g., radio, TV, internet, print) and names of stations, channels/networks, websites, and publications. Should these budgets be increased? Which channels are most effective? Explain.

SoCalGas Response:

<u>CARE</u>

As indicated by recent CARE program results, mass media outlets such as Radio, TV, Outdoor and Print advertising continue to be a cost effective means to raise awareness and increase CARE program participation. SoCalGas' service area covers 500 diverse communities across 20,000 square miles and serves an estimated 5.3 million residential customers. Los Angeles County alone, although estimated to have an 85% CARE penetration rate, still is home to approximately 140,000 potentially CARE eligible non-participating customers and is the second most expensive media market in the country. In past program years SoCalGas was only able to purchase one or two mediums per market (e.g., print and radio), but with the proposed outreach budget SoCalGas would have the flexibility to either strengthen their current media buys (meaning more stations, more frequency) or purchase another "layer" of media (e.g., online or TV). This increased mass media presence would allow the CARE and LIEE message to run concurrently across various mediums, thereby increasing the likelihood that the target audience will remember the message and be motivated to enroll in the program. Although no one mass media channel should be used alone to effectively reach low-income customers, SoCalGas has determined that traffic radio advertising consistently provides the "biggest bang for the CARE program buck" and represents 69% of the CARE program mass media expense.

2006 = Total: $222,674

- **General & African American Market ($84,654)**
  - **Print: $37,989**
    - PennySaver, The Los Angeles Sentinel, LA Watts Times, California Crusader
  - **Radio Traffic: $46,665**
    - Metro Stations: KABC-AM, KCBS-FM, KFSH-FM, KKBT-FM, KKLA-FM, KLOS-FM, KLSX-FM, KMZT-FM, KNX-AM, KRLA-AM, KROQ-FM, KRTH-FM, KSPN-FM, KTWV-FM, KWVE-FM, KATY-FM, KCAL-FM, KCXX-FM, KFRG-FM, KGLA-FM, KWIE-FM, KBBY-FM, KCAQ-FM,

KFYV-FM, KHAY-FM, KKZZ-FM, KMGQ-FM, KMLT-FM, KOCP-FM, KRUZ-FM, KVEN-AM, KVTA-AM, KVYB-

- **Hispanic Market ($107,850)**
  - **Radio Liners: $98,175**
    - KLVE-FM, KSCA-FM, KRCD-FM, KRCD-FM, KKHJ-FM
  - **Door Hangers: $9,675**
    - 50,000 self-mailers with flyer in clear bag
- **Asian Markets (Chinese & Korean) ($30,170)**
  - **Newspaper Inserts $6,200**
    - Chinese Daily News, Korean Times
  - **Radio: $11,198**
    - KAZN-AM, KMRB-AM (Chinese) and Radio Korean, Radio Seoul (Korean)
  - **TV: $12,772**
    - TVB (Chinese) and KSCI (Korean)

2007 = Total: $342,034*

- **General & African American Market ($120,622)**
  - **Print: $43,522**
    - LA Sentinel, California Crusader, LA Watts Times, Compton Bulletin, Wilmington Beacon, Carson Bulletin-Circulation, Inglewood Tribune, The Long Beach Californian, Lynwood Journal-Circulation, Black Voice News, Herald Dispatch, Firestone Park News, Southeast News Press, Watts Star Review, Long Beach Times, Precinct Reporter, San Bernardino American News.
  - **Radio Traffic: $77,100**
    - Metro Stations: KABC-AM, KCBS-FM, KFSH-FM, KKBT-FM, KKLA-FM, KLOS-FM, KLSX-FM, KMZT-FM, KNX-AM, KRLA-AM, KROQ-FM, KRTH-FM, KSPN-FM, KTWV-FM, KWVE-FM, KATY-FM, KCAL-FM, KCXX-FM, KFRG-FM, KGLA-FM, KWIE-FM, KBBY-FM, KCAQ-FM, KFYV-FM, KHAY-FM, KKZZ-FM, KMGQ-FM, KMLT-FM, KOCP-FM, KRUZ-FM, KVEN-AM, KVTA-AM, KVYB-FM
- **Hispanic Market ($174,882)**
  - **Radio (:60's and liners): $174,882**
    - KRCD-FM, KLVE-FM, KSCA-FM, KBUE-FM, KKHJ-FM, KSSE-FM, KWIZ-FM, KXLM-FM, KMLA-FM, KAEH-FM, KXSB-FM
    - KIDI-FM; KLUN-FM/KLMM-FM; KRQK-FM; KZER-AM, KBKO-AM, KSPE-FM, KSMY-FM, KXLM-FM, KMLA-FM, KLJR-FM, KOXR-FM, KAEH-FM, KXSB-FM/KXRS, KCAL-AM, KDIF-AM
- **Asian Markets (Chinese & Korean) ($46,530)**
  - **Radio: $19,408**
    - KAZN-AM, KMRB-AM (Chinese) and Radio Korean, Radio Seoul (Korean)
  - **TV: $27,122**
    - LA 18,TVB (Chinese) and KTAN, KBS (Korean)

**** Does not include $17,869 worth of cross promotion received from LIEE funded General/African American market Print Ads in the Northern Region during the winter freeze campaign.***

2008 = Total: $305,239

<u>March Winter Campaign</u>

- **General & African American Market ($134,176)**
  - **Print Ad: $2,098** (1/3 of the cost. Campaign shared with LIEE and Med Baseline)
    - The Los Angeles Sentinel, LA Watts Times, California Crusader, Our Weekly.
  - **Radio Traffic: $100,878**
    - Metro Stations: KABC-AM, KCBS-FM, KFSH-FM, KFWG-AM, KKGO-FM, KKLA-FM, KLOS-FM, KLSX-FM, KMVN-FM, KNX-AM, KRBV-FM, KRLA-AM, KROQ-FM, KRTH-FM, KTWV-FM
    - Clear Channel Stations: KBIG-FM, KDAY-FM, KFI-AM, KFSH-FM, KGGI-FM, KHHT-FM, KIIS-FM, KLAC-AM, KMVN-FM, KMPC-AM, KOST-FM, KRLA-AM, KYLK-FM, KYSR-FM
    - KMVN-FM
  - **Outdoor (BusTails & Interiors) $31,200**
- **Hispanic Market ($84,572)**
  - **Radio Traffic: $63,772**
    - Metro Stations: KBUA-FM, KBUE-FM, KLAX-FM, KWKW-AM, KXOL-FM
    - Clear Channel Stations: KLVE-FM, KRCD/V-FM, KSCA-FM, KTNQ-FM
  - **Outdoor (Bus Tails & Interiors) $20,800**
- **Asian Markets (Chinese & Korean) ($46,491)**
  - **Radio: $25,441**
    - KAZN-AM, KMRB-AM, KWRM-AM (Chinese) and Radio Korean, Radio Seoul (Korean)
  - **TV: $21,050**
    - LA 18,TVB (Chinese) and KTAN, KBS (Korean)

<u>December Fall Campaign</u>

- **Genera, African American & Hispanic Markets ($40,000)**
  - **Radio Traffic: $(20,000)**
    - Metro Stations: *Undetermined*
  - **TV B-Roll: $20,000** (costs split 50% with LIEE)

2009 = Total: $435,938

- **General & African American Market ($152,575)**
  - Would be used to buy media such as: radio traffic, online, targeted print, etc.
- **Hispanic Market ($217,963)**
  - Would be used to buy media such as: radio traffic, online, etc.
- **Asian Markets ($65,400)**

- Would be used to buy media such as print, radio, tv, etc.

2010 = Total: $448,580

- **General & African American Market ($157,000)**
  - Would be used to buy media such as: radio traffic, online, targeted print, etc.
- **Hispanic Market ($224,290)**
  - Would be used to buy media such as: radio traffic, online, etc.
- **Asian Markets ($67,290)**
  - Would be used to buy media such as print, radio, tv, etc.

2011 = Total: $461,589

- **General & African American Market ($161,566)**
  - Would be used to buy media such as: radio traffic, online, targeted print, etc.
- **Hispanic Market ($230,794)**
  - Would be used to buy media such as: radio traffic, online, etc.
- **Asian Markets ($69,238)**
  - Would be used to buy media such as print, radio, TV, etc.

<u>LIEE</u>

Like its customer assistance program counter part CARE, described in detail above, SoCalGas also understands the essential role multi-channel mass media advertising plays in reaching low-income customers with the LIEE program message. Because LIEE and CARE share the same eligibility guidelines, similar communication channels and campaigns can be used to reach their targeted low-income customers. It is important to note however, that while some mass media campaign leveraging can be accomplished to help reduce costs (e.g. campaign design & media purchases), because of the uniqueness of each program and existing media pressure or clutter within SoCalGas' service area *it is not recommended to conduct joint program campaigns.* Like the CARE program, traffic radio will continue to represent the bulk of LIEES' mass media expenses, and will be supplemented by other cost effective channels as appropriate. A significant part of the LIEE mass media strategy will be to raise overall brand awareness of the SoCalGas program, which in turn should drive increased customer participation and satisfaction.

2006 Total = $188,396

- **General & African American Market ($102,506)**
  - **Print Ad: $1,356** (1/3 of the cost. Campaign shared with CARE and Med Baseline)
    - The Los Angeles Sentinel, LA Watts Times, California Crusader, Our Weekly, Dinuba Sentinel
  - **Radio Traffic: $101,150**

        - Clear Channel Stations: KBIG-FM, KDAY-FM, KFI-AM, KFSH-FM, KGGI-FM, KHHT-FM, KIIS-FM, KLAC-AM, KMVN-FM, KMPC-AM, KOST-FM, KRLA-AM, KYLK-FM, KYSR-FM
- **Hispanic Market ($85,890)**
    - Radio Traffic: $85,890
        - KWKW-AM; KWIZ-FM; KSSE-FM, KBUE-FM; KIWI-FM, KBF, KGEN, KZER-AM, KSPE-FM; KXLM-FM, KLJR-FM, KLOB-FM, KUNA-FM; KMXX-FM, KSEH-FM

2007 = Total $22,869

- **General & African American Market ($)**
    - **Print Ad: $17,869** (Campaign shared with CARE)
        - Visalia Times/Tulare Register, Fresno Bee, Porterville Recorder, Bakersfield California, Antelope Valley Press.
- **Hispanic Market ($5,000) ***
    - TV: $5,000
        - One (1) :80 second Interview Segment: Despierta Los Angeles KMEX
    - Radio (Shared with EE)
        - Two (2) :60 second On-Air endorsements: KLVE-FM

2008 = Total: $94,188

- **General & African American Market ($49,693)**
    - **Print Ad: $2,098** (1/3 of the cost. Campaign shared with CARE and Med Baseline)
        - The Los Angeles Sentinel, LA Watts Times, California Crusader, Our Weekly.
    - **Radio Traffic: $7,845**
        - Metro Stations: KABX-FM, KALZ-FM, KBOS-FM, KCBL-AM, KEZL-AM, KFJK-FM, KFRR-FM, KHGE-FM, KIOO-FM, KJFX-FM, KJZN-FM, KMGV-FM, KMJ-AM, KRZR-FM, KSKS-FM, KSOF-FM, KWYE-FM
        - Clear Channel Stations: KBKO-FM, KDFO-FM, KRAB-FM
    - **Outdoor (BusTails & Interiors) $39,750**
- **Hispanic Market ($44,495)**
    - **Radio Traffic: $5,245**
        - Metro Stations: KGST-FM, KLBN-FM, KOQO-FM, KXOB-FM
        - Clear Channel Stations: KBFP-AM, KBFP-FM, KHTY-AM
    - **Outdoor (Bus Tails & Interiors) $26,500**
    - **TV: $12,750**
        - Two (2) :80 second Interview Segment: Despierta Los Angeles KMEX

2009 = Total: $300,000

- **General & African American Market ($105,000)**
    - Would be used to buy media such as: radio traffic, online, targeted print, etc.
- **Hispanic Market ($150,000)**
    - Would be used to buy media such as: radio traffic, online, etc.
- **Asian Markets ($45,000)**

- Would be used to buy media such as print, radio, tv, etc.

2010 = Total: $350,000

- **General & African American Market ($122,500)**
  - Would be used to buy media such as: radio traffic, online, targeted print, etc.
- **Hispanic Market ($175,000)**
  - Would be used to buy media such as: radio traffic, online, etc.
- **Asian Markets ($52,500)**
  - Would be used to buy media such as print, radio, tv, etc.

2011 = Total: $350,000

- **General & African American Market ($122,500)**
  - Would be used to buy media such as: radio traffic, online, targeted print, etc.
- **Hispanic Market ($175,000)**
  - Would be used to buy media such as: radio traffic, online, etc.
- **Asian Markets ($52,500)**
  - Would be used to buy media such as print, radio, tv, etc.

LIEE Media Events (no cost)

2006

- **SoCalGas and City of McFarland Customer Assistance Event**
  - The *Bakersfield California*
  - TV news stations Eyewitness News 29 (CBS), FOX 58, KGET-TV 17 (NBC)
  - KERN-AM 1410 News radio
- **SoCalGas and City of Dinuba Customer Assistance Event**
  - *Fresno Bee*, *Dinuba Sentinel*
  - Spanish language *Radio Campesina* and local TV news station *Azteca America*

2007

- Free Home Energy Makeover KTLA-TV Ch. 5 - SoCalGas' DAP program was featured on the KTLA-TV Ch. 5 morning show. The show is also simulcast on KSWB-TV Ch. 5 in San Diego.
- SoCalGas national Telemundo segment promoting DAP and CARE - a segment aired promoting free home energy improvements done by SoCalGas for income-qualified customers.

9. How many jobs in communities served by the CARE and LIEE programs have these programs created over the last two program cycles? What kind of jobs were created, and what are

the demographics of those employed? (The jobs must have gone to low-income persons, and may involve direct IOU employment, employment as program contractors and subcontractors, and/or employment at community based organizations. The jobs must also be in furtherance of the LIEE and CARE programs.) Will the 2009-2011 programs create similar jobs? If so, answer the foregoing questions about the jobs and employees/contractors.

SoCalGas Response:

CARE

During PY 2007 – 2008, SoCalGas' CARE 3rd Party Outreach program is directly responsible for the creation of 50 low-income outreach jobs employed by their contractor LMG, Inc. These indirect SoCalGas sub-contractors have diversified groups, such as Hispanic, Chinese, Filipino, and Armenian. This highly successful door-to-door outreach program reaches out to SoCalGas' hardest to reach CARE eligible customers in a professional and cost effective manner, and there is considerable enrollment and employment growth potential for this outreach strategy for PY 2009 – 2011.

LIEE

Because SoCalGas contracts with over thirty LIEE service providers and many of these contractors provide various low-income services (e.g., LIHEAP), providing an accurate estimate of the number of new LIEE jobs created over the past two program cycles is very difficult. The number of homes treated by SoCalGas has remained relatively constant over the past few program years (40,523 in 2005, 36,870 in 2006 and 44,176 in 2007) so the assumption can be made that the number of new LIEE jobs created over this timeframe is relatively small.

SoCalGas obtained workforce information from a sampling of their contractor network and has developed the following workforce projections for 2009-2011[8]:

[8] Original workforce projections are provided in SoCalGas' response to Question 33 of the Administrative Law Judge's Ruling Seeking Further Information on Large Investor-Owned Utilities' 2009-2011 Low Income Energy Efficiency/CARE Applications dated June 27, 2008. The table provided in this response includes two additional line items not included on the table provided on June 27, 2008: 1) CBO Outreach Specialists and 2) Private Contractor Outreach Specialists.

	FTE Estimates			
	2008	**2009**	**2010**	**2011**
CBO Weatherization Crews	93	106	136	137
CBO Administrative Staff	83	87	119	120
CBO HVAC Crews	42	75	96	96
CBO Outreach Specialists	85	124	160	163
Private Contractor Weatherization Crews	50	57	73	74
Private Contractor Administrative Staff	45	47	64	65
Private Contractor HVAC Crews	23	41	52	52
Private Contractor Outreach Specialists	46	67	86	88
Total	465	602	786	794

Based on contractor input, SoCalGas estimates that 65-80% of today's LIEE workforce was hired from low income communities. SoCalGas believes the workforce required for PY 2009-2011 will require similar type of skill sets as today's existing workforce.

10. What, if any, type of Smart Meter/advanced meter education are the IOUs providing as part of the LIEE program? Should the Commission fund any Smart Meter/advanced meter education programs in advance of broad availability of the meters in homes? Will the education results last if education happens in the 2009-2011 period and the IOUs do not make the meters ubiquitous until 2011 and later? Explain.

SoCalGas Response: This question does not apply to SoCalGas because SoCalGas is not proposing to offer this measure.

11. SDG&E proposes a light emitting diode nightlight program that costs pennies a year. Given the large electric energy burden represented by lighting, have the other IOUs considered this measure as part of their program? If not, explain why.

SoCalGas Response: This question is not applicable to SoCalGas because SoCalGas is a natural gas utility.

12. Are there other programs that one IOU offers that the Commission should require all IOUs to offer because they are cost-effective, produce high energy savings, or have other positive attributes for LIEE customers? Explain.

SoCalGas Response:
SoCalGas and the other IOUs agree there may be specific LIEE measures and/or program components that may be beneficial to offer in some utility service territories while not in others based on a variety of factors such as, and not limited to: climate, energy costs, structure type, and population density. This approach also holds true when examining a utilities' own service territory where it may be beneficial to offer some measures and/or components in particular areas (e.g., hot climate zones) while not in others. The IOUs have jointly proposed two evaluation studies in their 2009-2011 Applications and the results of the studies will assist the IOUs in identifying any utility specific measures and/or program components that may be beneficial to implement in other service territories. Brief overviews of the two proposed studies are as follows:

> **Process Evaluation of the 2009 LIEE Program** - The purpose of the Process Evaluation of the 2009 LIEE Program is to assess the effectiveness of the program and to develop recommendations for changes to program design or delivery that will improve the effectiveness of the program.
>
> **Impact Evaluation of the 2010 LIEE Program** - The primary objective of the study will be to estimate the first year electric and gas savings by utility, by housing type, and by measure group. Other related program issues will likely be addressed as they arise during the program year.

SoCalGas believes that it is in the best interest of the LIEE program to allow the IOUs to fully implement the proposals that have been recommended in their 2009-2011 Applications and to

undertake an evaluation process to ensure that the measure and/or program component is indeed worthy of statewide consideration. In recent years the IOUs have implemented several new measures that have proven to not be as beneficial as initially envisioned, i.e., duct testing and sealing and tankless water heaters. A thorough evaluation process is an important component to determining statewide adoption of a new measure/program.

13. Do the large IOUs other than PG&E offer a program similar to REACH? How are the program(s), if any, funded?

SoCalGas Response:

For many years SoCalGas has offered the GAF program to provide payment assistance to customers who are experiencing difficulty paying their natural gas bills. Historically, the program has been funded through an annual shareholder contribution, and through employee and customer contributions. No public goods charge funds are used to fund the GAF program as has proposed by PG&E for its REACH program in its Application for 2009 - 2011.

14. The IOUs propose setting the base year for calculating the programmatic initiative to 2002 and eliminating the 10-Year "Go-Back" Rule, citing the inclusion of "Rapid Deployment" measures in the LIEE program as a reason for this modification. How drastically has the program changed since 2002 and are such changes reason enough to justify this modification?

SoCalGas Response:

D.07-12-051 directs the utilities to "[e]liminate or modify the ten year "go back'" rule to permit installations of new measures and technologies in all households while avoiding duplicative installations". In their applications, the IOUs are not proposing to eliminate the ten year "go-back" rule and instead propose to make the following modifications/exceptions to be added to "Section 2.8 Previous Participation" of the LIEE P&P Manual:

- New cost effective measures or technologies that were not previously available in the LIEE program at the time the utility treated a home shall be made available for those qualifying customers

- In the event a key program eligibility requirement now makes a customer eligible for measures previously not offered at the time the utility treated the home, the utility shall make available those cost effective measures for qualified customers.

In setting the base year for calculating the programmatic initiative, the IOUs evaluated a number of issues relative to the goal of the programmatic initiative and making low income homes energy efficient. Historically, the IOUs have adhered to the Statewide Policies & Procedure Manual's "10 year rule" and counted all of those homes treated in the last 10 years as homes that had been previously served by the LIEE program, and therefore were not currently eligible for participation. When evaluating this requirement and assessing the levels of service provided to customers over the past 10 years, the IOUs decided that the number of customers who had been served since the end of 2001, when "Rapid Deployment" measures were included in the program, best represented the number of customers who had received "all feasible measures," because only a few new measures have been introduced to the LIEE program since that time. The table below provides a high-level overview of the measures added and removed from the LIEE program between 2001 and 2007.

Program Year	Measure Added	Measure Removed	Utility
Mid-2001 (Rapid Deployment)	Air Conditioning (A/C)		PG&E, SCE, SDG&E
	Duct Testing and Sealing		All
	Gas and electric water heaters		All
	Set-back thermostats		All
	Evaporative Cooler Maintenance		PG&E, SCE, SDG&E
	Whole house fans		PG&E, SCE, SDG&E
	Refrigerator (for renters)		PG&E, SCE, SDG&E
	Hard-wired porch light fixtures (for renters)		PG&E, SCE, SDG&E
	Evaporative Cooler (for renters)		PG&E, SCE, SDG&E
2002	None	None	n/a
2003	None	None	n/a

2004		High Efficiency Water Heaters	All
		High Efficiency Central A/C	PG&E, SCE, SDG&E
		Duct Testing and Sealing	All
		Evaporative Cooler Maintenance	PG&E, SCE, SDG&E
		Set-back thermostats	All
		Whole House Fans	PG&E, SCE, SDG&E
2005	Replacement of water heaters leaking from the tank*		All
	Go-back refrigerator replacement*		PG&E, SCE, SDG&E
2006	Energy Efficient Central A/C (Climate Zones 14 and 15 only)**		All
	Duct Testing and Sealing		All
2007	Interior Hard-Wired Compact Fluorescent Lights		All
	Energy Efficient Central A/C (Climate Zone 13)**		SCE
	Central A/C Tune-Up/Service		All
	Tankless Water Heater		SCG and SDG&E
	Torchiere Replacement		SCE and SDG&E
	Evaporative Cooler Maintenance		SCE

* Introduced during 2005/2006 Winter Initiative and remained in program.
** Go back measures - SCE only
*** Installed on a limited basis, based on the cost of installation.

As illustrated in the table above, many of the measures in today's LIEE program were introduced in mid-2001 and the IOUs are proposing that homes treated since the end of 2001 be considered energy efficient when determining the basis for total number of eligible LIEE customers to be served between 2009-2011. Homes that were serviced between 1999 and 2001 did not receive the benefits from "Rapid Deployment" measures and for this reason the IOUs are proposing that these homes not be considered energy efficient when determining the basis for total number of eligible LIEE customers to be served between 2009-2011. In fact, homes serviced by LIEE

between 1999 and 2001 will become eligible for services during the 2009-2011 program cycle as the ten year rule will no longer be a restriction on eligibility.

15. SDG&E and SoCalGas propose a Customer Rewards Program to provide incentives for energy savings. Will this program be available to all LIEE customers or only new LIEE customers? What is the best type of reward to provide as a component of LIEE to low-income populations? Should the Customer Rewards Program be implemented statewide? Explain.

SoCalGas Response:

The Customer Rewards Program will be for eligible customers enrolled in the LIEE Program during program years 2009, 2010 and 2011. SoCalGas believes the reward incentives will drive long term behavior changes and create sustained energy savings for LIEE customers. Additionally, it may potentially mitigate the rebound effect, whereby customers use more energy because they have more discretionary dollars, as a result of reduced energy bills.

SoCalGas believes a bill credit is the most appropriate reward type to offer participating LIEE customers because it will assist customers who may have arrears on their bill and will also reduce the likelihood of meter turn-offs. SoCalGas will monitor the success of the Customer Rewards Program by comparing the estimated energy savings from the measures installed to actual customer energy consumption. After the first year, SoCalGas will review the accomplishments of the Customer Rewards Program and make any modifications to increase the effectiveness of the program. SoCalGas will make available these results to the other IOUs, interested parties and CPUC for consideration as to whether a Customer Rewards Program is appropriate to be implemented statewide.

16. How did you calculate your energy savings figures?

SoCalGas Response:

Most of the impacts used in the analysis were taken from the PY2005 Impact Evaluation.[9] Where impacts were not provided in this study, they were taken from the Database for Energy

[9] West Hill Energy & Computing, Inc. Impact Evaluation of the 2005 California Low Income Energy Efficiency Program Final Report, December 2007.

Efficiency Resources ("DEER"), internal work papers, or an assessment of selected measures provided by Itron in 2005.[10] The following tables list the source of impacts used for each measure.

SoCalGas

Measure	Source of Impacts
Air sealing	PY2005 Impact Evaluation
Attic insulation	PY2005 Impact Evaluation
Gas furnace measures	PY2005 Impact Evaluation
Gas furnace pilot conversion	Internal work papers
Duct sealing & testing	Itron Assessment Report 2005
DHW conservation	PY2005 Impact Evaluation
DHW repair or replace	PY2005 Impact Evaluation
Tankless water heater	DEER
Clothes washer	Internal work papers

a. Are those savings based on average energy savings across all users?

SoCalGas Response:

In most cases, savings are calculated for users in a particular housing type (single family, multi-family or mobile home). For weather-sensitive measures, savings are further disaggregated by climate zone.

b. Should the energy savings calculations be different depending on the segment of the population a measure will serve? For example, will energy savings differ among high and low users?

SoCalGas Response:

In addition to reporting savings estimates by housing type, the PY 2005 Impact Evaluation also reported savings by four categories of pre-installation usage level.[11] According to that study, pre-installation usage was a better distinction for savings levels than housing types or climate zones in some cases. For measures where there are sufficient installations to allow for estimation among usage categories, this method should be employed in future evaluations.

b. If your answer to b) is yes, should these changes become part of the impact evaluation study you propose in your budget applications?

[10] Itron, Inc., Preliminary Report on the Assessment of Proposed New LIEE Measures, March 2005.

[11] "The four use levels were defined as follows: the first group included the 10% of accounts with the lowest usage, the second group were in the 10 to 50% bin, the third from 50% to 90% and the fourth were the 10% of accounts with the highest use." West Hill Energy & Computing, Impact Evaluation PY2005 at p. 75.

Response of SoCalGas:

Yes.

Question for SDG&E

SDG&E plans to contract out the enrollment of customers and the installation of program measures and services plans, and will continue to use their current in-house staff for inspections for LIEE and general EE programs. Does this proposal present any conflict of interest? Does it ensure that those installing measures and those inspecting or evaluating those installations are independent of one another? Explain.

SoCalGas Response:

This question does not apply to SoCalGas.

Question for SCE

18. SCE does not propose any new measures, yet continues to rely heavily on CFLs. Why is this?

SoCalGas Response:

This question does not apply to SoCalGas.

III. CONCLUSION

SoCalGas appreciates this opportunity to provide further detail and clarity regarding its Application and looks forward to working with the Commission and other interested parties in this proceeding. This concludes SoCalGas' responses.

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Respectfully submitted,

/s/ Kim F. Hassan
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ATTACHMENT 1

HUD FY 2008 INCOME LIMITS COMPARED TO CARE AND LIEE

HUD FY 2008 Income Limits Compared to CARE and LIEE

		Number of Members in Household							
		1	2	3	4	5	6	7	8
CARE and LIEE 2008-2009 Maximum Household Income @200% FPG		**$30,500**	**$30,500**	**$35,800**	**$43,200**	**$50,600**	**$58,000**	**$65,400**	**$72,800**
FERA 2008-2009 Maximum Household Income @ 250% FPG				**$44,800**	**$54,000**	**$63,200**	**$72,400**	**$81,600**	**$90,800**
	HUD Income Tier								
30% of Median Income =	**Extremely Low**								
50% of Median Income =	**Very Low**								
80% of Median Income =	**Low**								
	SoCalGas or SDG&E County Served								
	= HUD Exceeds CARE/LIEE								
Alameda County	Extremely Low	$18,100	$20,700	$23,250	$25,850	$27,900	$30,000	$32,050	$34,100
	Very Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850
	Low	$46,350	$53,000	$59,600	$66,250	$71,550	$76,850	$82,150	$87,450
Alpine County	Extremely Low	$14,550	$16,650	$18,700	$20,800	$22,450	$24,150	$25,800	$27,450
	Very Low	$24,300	$27,750	$31,250	$34,700	$37,500	$40,250	$43,050	$45,800
	Low	$38,850	$44,400	$49,950	$55,500	$59,950	$64,400	$68,800	$73,250
Amador County	Extremely Low	$14,000	$16,000	$18,000	$20,000	$21,600	$23,200	$24,800	$26,400
	Very Low	$23,350	$26,700	$30,000	$33,350	$36,000	$38,700	$41,350	$44,000
	Low	$37,350	$42,700	$48,000	$53,350	$57,600	$61,900	$66,150	$70,400
Butte County	Extremely Low	$11,450	$13,100	$14,700	$16,350	$17,650	$18,950	$20,250	$21,600
	Very Low	$19,100	$21,800	$24,550	$27,250	$29,450	$31,600	$33,800	$35,950
	Low	$30,500	$34,900	$39,250	$43,600	$47,100	$50,600	$54,050	$57,550
Calaveras County	Extremely Low	$12,900	$14,700	$16,550	$18,400	$19,850	$21,350	$22,800	$24,300
	Very Low	$21,500	$24,550	$27,650	$30,700	$33,150	$35,600	$38,050	$40,500
	Low	$34,350	$39,300	$44,200	$49,100	$53,050	$56,950	$60,900	$64,800
Colusa County	Extremely Low	$11,300	$12,900	$14,550	$16,150	$17,450	$18,750	$20,050	$21,300
	Very Low	$18,850	$21,500	$24,200	$26,900	$29,050	$31,200	$33,350	$35,500
	Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850
Contra Costa County	Extremely Low	$18,100	$20,700	$23,250	$25,850	$27,900	$30,000	$32,050	$34,100
	Very Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850
	Low	$46,350	$53,000	$59,600	$66,250	$71,550	$76,850	$82,150	$87,450
Del Norte County	Extremely Low	$11,300	$12,900	$14,550	$16,150	$17,450	$18,750	$20,050	$21,300
	Very Low	$18,850	$21,500	$24,200	$26,900	$29,050	$31,200	$33,350	$35,500
	Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850
El Dorado County	Extremely Low	$14,900	$17,050	$19,150	$21,300	$23,000	$24,700	$26,400	$28,100
	Very Low	$24,850	$28,400	$31,950	$35,500	$38,350	$41,200	$44,000	$46,850

HUD FY 2008 Income Limits Compared to CARE and LIEE

		Number of Members in Household							
		1	2	3	4	5	6	7	8
CARE and LIEE 2008-2009 Maximum Household Income @200% FPG		**$30,500**	**$30,500**	**$35,800**	**$43,200**	**$50,600**	**$58,000**	**$65,400**	**$72,800**
FERA 2008-2009 Maximum Household Income @ 250% FPG				**$44,800**	**$54,000**	**$63,200**	**$72,400**	**$81,600**	**$90,800**
	HUD Income Tier								
30% of Median Income =	**Extremely Low**								
50% of Median Income =	**Very Low**								
80% of Median Income =	**Low**								
	SoCalGas or SDG&E County Served								
	= HUD Exceeds CARE/LIEE								
	Low	$39,750	$45,450	$51,100	$56,800	$61,350	$65,900	$70,450	$75,000
Fresno County	Extremely Low	$11,300	$12,900	$14,550	$16,150	$17,450	$18,750	$20,050	$21,300
	Very Low	$18,850	$21,500	$24,200	$26,900	$29,050	$31,200	$33,350	$35,500
	Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850
Glenn County	Extremely Low	$11,300	$12,900	$14,550	$16,150	$17,450	$18,750	$20,050	$21,300
	Very Low	$18,850	$21,500	$24,200	$26,900	$29,050	$31,200	$33,350	$35,500
	Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850
Humboldt County	Extremely Low	$11,300	$12,900	$14,550	$16,150	$17,450	$18,750	$20,050	$21,300
	Very Low	$18,850	$21,500	$24,200	$26,900	$29,050	$31,200	$33,350	$35,500
	Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850
Imperial County	Extremely Low	$11,300	$12,900	$14,550	$16,150	$17,450	$18,750	$20,050	$21,300
	Very Low	$18,850	$21,500	$24,200	$26,900	$29,050	$31,200	$33,350	$35,500
	Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850
Inyo County	Extremely Low	$12,100	$13,800	$15,550	$17,250	$18,650	$20,000	$21,400	$22,750
	Very Low	$20,150	$23,000	$25,900	$28,750	$31,050	$33,350	$35,650	$37,950
	Low	$32,200	$36,800	$41,400	$46,000	$49,700	$53,350	$57,050	$60,700
Kern County	Extremely Low	$11,300	$12,900	$14,550	$16,150	$17,450	$18,750	$20,050	$21,300
	Very Low	$18,850	$21,500	$24,200	$26,900	$29,050	$31,200	$33,350	$35,500
	Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850
Kings County	Extremely Low	$11,300	$12,900	$14,550	$16,150	$17,450	$18,750	$20,050	$21,300
	Very Low	$18,850	$21,500	$24,200	$26,900	$29,050	$31,200	$33,350	$35,500
	Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850
Lake County	Extremely Low	$11,300	$12,900	$14,550	$16,150	$17,450	$18,750	$20,050	$21,300
	Very Low	$18,850	$21,500	$24,200	$26,900	$29,050	$31,200	$33,350	$35,500
	Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850
Lassen County	Extremely Low	$11,700	$13,350	$15,050	$16,700	$18,050	$19,350	$20,700	$22,050

HUD FY 2008 Income Limits Compared to CARE and LIEE

		Number of Members in Household							
		1	2	3	4	5	6	7	8
CARE and LIEE 2008-2009 Maximum Household Income @200% FPG		**$30,500**	**$30,500**	**$35,800**	**$43,200**	**$50,600**	**$58,000**	**$65,400**	**$72,800**
FERA 2008-2009 Maximum Household Income @ 250% FPG				**$44,800**	**$54,000**	**$63,200**	**$72,400**	**$81,600**	**$90,800**
	HUD Income Tier								
30% of Median Income =	**Extremely Low**								
50% of Median Income =	**Very Low**								
80% of Median Income =	**Low**								
	SoCalGas or SDG&E County Served								
	= HUD Exceeds CARE/LIEE								
	Very Low	$19,450	$22,250	$25,000	$27,800	$30,000	$32,250	$34,450	$36,700
	Low	$31,150	$35,600	$40,050	$44,500	$48,050	$51,600	$55,200	$58,750
Los Angeles County	Extremely Low	$15,950	$18,200	$20,500	$22,750	$24,550	$26,400	$28,200	$30,050
	Very Low	$26,550	$30,300	$34,100	$37,900	$40,950	$43,950	$47,000	$50,050
	Low	$42,450	$48,500	$54,600	$60,650	$65,500	$70,350	$75,200	$80,050
Madera County	Extremely Low	$11,300	$12,900	$14,550	$16,150	$17,450	$18,750	$20,050	$21,300
	Very Low	$18,850	$21,500	$24,200	$26,900	$29,050	$31,200	$33,350	$35,500
	Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850
Marin County	Extremely Low	$23,750	$27,150	$30,550	$33,950	$36,650	$39,400	$42,100	$44,800
	Very Low	$39,600	$45,250	$50,900	$56,550	$61,050	$65,600	$70,100	$74,650
	Low	$63,350	$72,400	$81,450	$90,500	$97,700	$104,950	$112,200	$119,450
Mariposa County	Extremely Low	$11,350	$12,950	$14,600	$16,200	$17,500	$18,800	$20,100	$21,400
	Very Low	$18,900	$21,600	$24,300	$27,000	$29,150	$31,300	$33,500	$35,650
	Low	$30,250	$34,550	$38,900	$43,200	$46,650	$50,100	$53,550	$57,000
Mendocino County	Extremely Low	$11,300	$12,900	$14,550	$16,150	$17,450	$18,750	$20,050	$21,300
	Very Low	$18,850	$21,500	$24,200	$26,900	$29,050	$31,200	$33,350	$35,500
	Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850
Merced County	Extremely Low	$11,300	$12,900	$14,550	$16,150	$17,450	$18,750	$20,050	$21,300
	Very Low	$18,850	$21,500	$24,200	$26,900	$29,050	$31,200	$33,350	$35,500
	Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850
Modoc County	Extremely Low	$11,300	$12,900	$14,550	$16,150	$17,450	$18,750	$20,050	$21,300
	Very Low	$18,850	$21,500	$24,200	$26,900	$29,050	$31,200	$33,350	$35,500
	Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850
Mono County	Extremely Low	$13,850	$15,800	$17,800	$19,750	$21,350	$22,900	$24,500	$26,050
	Very Low	$23,050	$26,350	$29,650	$32,950	$35,600	$38,200	$40,850	$43,500
	Low	$36,900	$42,150	$47,450	$52,700	$56,900	$61,150	$65,350	$69,550

HUD FY 2008 Income Limits Compared to CARE and LIEE

		Number of Members in Household							
		1	2	3	4	5	6	7	8
CARE and LIEE 2008-2009 Maximum Household Income @200% FPG		**$30,500**	**$30,500**	**$35,800**	**$43,200**	**$50,600**	**$58,000**	**$65,400**	**$72,800**
FERA 2008-2009 Maximum Household Income @ 250% FPG				**$44,800**	**$54,000**	**$63,200**	**$72,400**	**$81,600**	**$90,800**
	HUD Income Tier								
30% of Median Income =	**Extremely Low**								
50% of Median Income =	**Very Low**								
80% of Median Income =	**Low**								
	SoCalGas or SDG&E County Served								
	= HUD Exceeds CARE/LIEE								
Monterey County	Extremely Low	$13,600	$15,550	$17,500	$19,450	$21,000	$22,550	$24,100	$25,650
	Very Low	$22,700	$25,900	$29,150	$32,400	$35,000	$37,600	$40,200	$42,750
	Low	$36,300	$41,500	$46,650	$51,850	$56,000	$60,150	$64,300	$68,450
Napa County	Extremely Low	$16,750	$19,100	$21,500	$23,900	$25,800	$27,700	$29,650	$31,550
	Very Low	$27,850	$31,850	$35,800	$39,800	$43,000	$46,150	$49,350	$52,550
	Low	$43,050	$49,200	$55,350	$61,500	$66,400	$71,350	$76,250	$81,200
Nevada County	Extremely Low	$13,700	$15,650	$17,600	$19,550	$21,100	$22,700	$24,250	$25,800
	Very Low	$22,800	$26,050	$29,300	$32,550	$35,150	$37,750	$40,350	$42,950
	Low	$36,450	$41,700	$46,900	$52,100	$56,250	$60,450	$64,600	$68,750
Orange County	Extremely Low	$19,550	$22,300	$25,100	$27,900	$30,150	$32,350	$34,600	$36,850
	Very Low	$32,550	$37,200	$41,850	$46,500	$50,200	$53,950	$57,650	$61,400
	Low	$52,100	$59,500	$66,950	$74,400	$80,350	$86,300	$92,250	$98,200
Placer County	Extremely Low	$14,900	$17,050	$19,150	$21,300	$23,000	$24,700	$26,400	$28,100
	Very Low	$24,850	$28,400	$31,950	$35,500	$38,350	$41,200	$44,000	$46,850
	Low	$39,750	$45,450	$51,100	$56,800	$61,350	$65,900	$70,450	$75,000
Plumas County	Extremely Low	$12,450	$14,200	$16,000	$17,750	$19,150	$20,600	$22,000	$23,450
	Very Low	$20,700	$23,650	$26,600	$29,550	$31,900	$34,300	$36,650	$39,000
	Low	$33,100	$37,850	$42,550	$47,300	$51,100	$54,850	$58,650	$62,450
Riverside County	Extremely Low	$14,000	$16,000	$18,000	$20,000	$21,600	$23,200	$24,800	$26,400
	Very Low	$23,300	$26,650	$29,950	$33,300	$35,950	$38,650	$41,300	$43,950
	Low	$37,300	$42,650	$47,950	$53,300	$57,550	$61,850	$66,100	$70,350
Sacramento County	Extremely Low	$14,900	$17,050	$19,150	$21,300	$23,000	$24,700	$26,400	$28,100
	Very Low	$24,850	$28,400	$31,950	$35,500	$38,350	$41,200	$44,000	$46,850
	Low	$39,750	$45,450	$51,100	$56,800	$61,350	$65,900	$70,450	$75,000
San Benito County	Extremely Low	$16,400	$18,700	$21,050	$23,400	$25,250	$27,150	$29,000	$30,900
	Very Low	$27,300	$31,200	$35,100	$39,000	$42,100	$45,250	$48,350	$51,500
	Low	$43,050	$49,200	$55,350	$61,500	$66,400	$71,350	$76,250	$81,200

HUD FY 2008 Income Limits Compared to CARE and LIEE

		Number of Members in Household							
		1	2	3	4	5	6	7	8
CARE and LIEE 2008-2009 Maximum Household Income @200% FPG		**$30,500**	**$30,500**	**$35,800**	**$43,200**	**$50,600**	**$58,000**	**$65,400**	**$72,800**
FERA 2008-2009 Maximum Household Income @ 250% FPG				**$44,800**	**$54,000**	**$63,200**	**$72,400**	**$81,600**	**$90,800**
	HUD Income Tier								
30% of Median Income =	**Extremely Low**								
50% of Median Income =	**Very Low**								
80% of Median Income =	**Low**								
	SoCalGas or SDG&E County Served								
	= HUD Exceeds CARE/LIEE								
San Bernardino County	Extremely Low	$14,000	$16,000	$18,000	$20,000	$21,600	$23,200	$24,800	$26,400
	Very Low	$23,300	$26,650	$29,950	$33,300	$35,950	$38,650	$41,300	$43,950
	Low	$37,300	$42,650	$47,950	$53,300	$57,550	$61,850	$66,100	$70,350
San Diego County	Extremely Low	$16,600	$18,950	$21,350	$23,700	$25,600	$27,500	$29,400	$31,300
	Very Low	$27,650	$31,600	$35,550	$39,500	$42,650	$45,800	$49,000	$52,150
	Low	$44,250	$50,550	$56,900	$63,200	$68,250	$73,300	$78,350	$83,400
San Francisco County	Extremely Low	$23,750	$27,150	$30,550	$33,950	$36,650	$39,400	$42,100	$44,800
	Very Low	$39,600	$45,250	$50,900	$56,550	$61,050	$65,600	$70,100	$74,650
	Low	$63,350	$72,400	$81,450	$90,500	$97,700	$104,950	$112,200	$119,450
San Joaquin County	Extremely Low	$12,900	$14,700	$16,550	$18,400	$19,850	$21,350	$22,800	$24,300
	Very Low	$21,450	$24,500	$27,600	$30,650	$33,100	$35,550	$38,000	$40,450
	Low	$34,350	$39,250	$44,150	$49,050	$52,950	$56,900	$60,800	$64,750
San Luis Obispo County	Extremely Low	$14,050	$16,100	$18,100	$20,100	$21,700	$23,300	$24,900	$26,550
	Very Low	$23,450	$26,800	$30,150	$33,500	$36,200	$38,850	$41,550	$44,200
	Low	$37,500	$42,900	$48,250	$53,600	$57,900	$62,200	$66,450	$70,750
San Mateo County	Extremely Low	$23,750	$27,150	$30,550	$33,950	$36,650	$39,400	$42,100	$44,800
	Very Low	$39,600	$45,250	$50,900	$56,550	$61,050	$65,600	$70,100	$74,650
	Low	$63,350	$72,400	$81,450	$90,500	$97,700	$104,950	$112,200	$119,450
Santa Barbara County	Extremely Low	$16,350	$18,700	$21,000	$23,350	$25,200	$27,100	$28,950	$30,800
	Very Low	$27,250	$31,100	$35,000	$38,900	$42,000	$45,100	$48,250	$51,350
	Low	$43,600	$49,800	$56,050	$62,250	$67,250	$72,200	$77,200	$82,150
Santa Clara County	Extremely Low	$22,300	$25,500	$28,650	$31,850	$34,400	$36,950	$39,500	$42,050
	Very Low	$37,150	$42,450	$47,750	$53,050	$57,300	$61,550	$65,800	$70,050
	Low	$59,400	$67,900	$76,400	$84,900	$91,650	$98,450	$105,250	$112,050
Santa Cruz County	Extremely Low	$18,250	$20,900	$23,500	$26,100	$28,200	$30,300	$32,350	$34,450
	Very Low	$30,450	$34,800	$39,150	$43,500	$47,000	$50,450	$53,950	$57,400

HUD FY 2008 Income Limits Compared to CARE and LIEE

		Number of Members in Household							
		1	2	3	4	5	6	7	8
CARE and LIEE 2008-2009 Maximum Household Income @200% FPG		**$30,500**	**$30,500**	**$35,800**	**$43,200**	**$50,600**	**$58,000**	**$65,400**	**$72,800**
FERA 2008-2009 Maximum Household Income @ 250% FPG				**$44,800**	**$54,000**	**$63,200**	**$72,400**	**$81,600**	**$90,800**
	HUD Income Tier								
30% of Median Income =	**Extremely Low**								
50% of Median Income =	**Very Low**								
80% of Median Income =	**Low**								
	SoCalGas or SDG&E County Served								
	= HUD Exceeds CARE/LIEE								
	Low	$48,700	$55,700	$62,650	$69,600	$75,150	$80,750	$86,300	$91,850
Shasta County	Extremely Low	$11,300	$12,900	$14,550	$16,150	$17,450	$18,750	$20,050	$21,300
	Very Low	$18,850	$21,500	$24,200	$26,900	$29,050	$31,200	$33,350	$35,500
	Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850
Sierra County	Extremely Low	$11,850	$13,500	$15,200	$16,900	$18,250	$19,600	$20,950	$22,300
	Very Low	$19,750	$22,550	$25,400	$28,200	$30,450	$32,700	$34,950	$37,200
	Low	$31,550	$36,100	$40,600	$45,100	$48,700	$52,300	$55,900	$59,550
Siskiyou County	Extremely Low	$11,300	$12,900	$14,550	$16,150	$17,450	$18,750	$20,050	$21,300
	Very Low	$18,850	$21,500	$24,200	$26,900	$29,050	$31,200	$33,350	$35,500
	Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850
Solano County	Extremely Low	$15,800	$18,100	$20,350	$22,600	$24,400	$26,200	$28,000	$29,850
	Very Low	$26,400	$30,150	$33,950	$37,700	$40,700	$43,750	$46,750	$49,750
	Low	$42,200	$48,250	$54,250	$60,300	$65,100	$69,950	$74,750	$79,600
Sonoma County	Extremely Low	$16,350	$18,700	$21,000	$23,350	$25,200	$27,100	$28,950	$30,800
	Very Low	$27,250	$31,100	$35,000	$38,900	$42,000	$45,100	$48,250	$51,350
	Low	$43,050	$49,200	$55,350	$61,500	$66,400	$71,350	$76,250	$81,200
Stanislaus County	Extremely Low	$11,850	$13,550	$15,250	$16,950	$18,300	$19,650	$21,000	$22,350
	Very Low	$19,800	$22,600	$25,450	$28,250	$30,500	$32,750	$35,050	$37,300
	Low	$31,650	$36,150	$40,700	$45,200	$48,800	$52,450	$56,050	$59,650
Sutter County	Extremely Low	$11,300	$12,900	$14,550	$16,150	$17,450	$18,750	$20,050	$21,300
	Very Low	$18,850	$21,500	$24,200	$26,900	$29,050	$31,200	$33,350	$35,500
	Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850
Tehama County	Extremely Low	$11,300	$12,900	$14,550	$16,150	$17,450	$18,750	$20,050	$21,300
	Very Low	$18,850	$21,500	$24,200	$26,900	$29,050	$31,200	$33,350	$35,500
	Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850
Trinity County	Extremely Low	$11,300	$12,900	$14,550	$16,150	$17,450	$18,750	$20,050	$21,300

HUD FY 2008 Income Limits Compared to CARE and LIEE

		Number of Members in Household							
		1	2	3	4	5	6	7	8
CARE and LIEE 2008-2009 Maximum Household Income @200% FPG		**$30,500**	**$30,500**	**$35,800**	**$43,200**	**$50,600**	**$58,000**	**$65,400**	**$72,800**
FERA 2008-2009 Maximum Household Income @ 250% FPG				**$44,800**	**$54,000**	**$63,200**	**$72,400**	**$81,600**	**$90,800**
	HUD Income Tier								
30% of Median Income =	**Extremely Low**								
50% of Median Income =	**Very Low**								
80% of Median Income =	**Low**								
	SoCalGas or SDG&E County Served								
	= HUD Exceeds CARE/LIEE								
	Very Low	$18,850	$21,500	$24,200	$26,900	$29,050	$31,200	$33,350	$35,500
	Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850
Tulare County	Extremely Low	$11,300	$12,900	$14,550	$16,150	$17,450	$18,750	$20,050	$21,300
	Very Low	$18,850	$21,500	$24,200	$26,900	$29,050	$31,200	$33,350	$35,500
	Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850
Tuolumne County	Extremely Low	$12,100	$13,800	$15,550	$17,250	$18,650	$20,000	$21,400	$22,750
	Very Low	$20,150	$23,000	$25,900	$28,750	$31,050	$33,350	$35,650	$37,950
	Low	$32,200	$36,800	$41,400	$46,000	$49,700	$53,350	$57,050	$60,700
Ventura County	Extremely Low	$18,000	$20,550	$23,150	$25,700	$27,750	$29,800	$31,850	$33,900
	Very Low	$30,000	$34,300	$38,550	$42,850	$46,300	$49,700	$53,150	$56,550
	Low	$48,000	$54,850	$61,700	$68,550	$74,050	$79,500	$85,000	$90,500
Yolo County	Extremely Low	$14,900	$17,050	$19,150	$21,300	$23,000	$24,700	$26,400	$28,100
	Very Low	$24,850	$28,400	$31,950	$35,500	$38,350	$41,200	$44,000	$46,850
	Low	$39,750	$45,450	$51,100	$56,800	$61,350	$65,900	$70,450	$75,000
Yuba County	Extremely Low	$11,300	$12,900	$14,550	$16,150	$17,450	$18,750	$20,050	$21,300
	Very Low	$18,850	$21,500	$24,200	$26,900	$29,050	$31,200	$33,350	$35,500
	Low	$30,150	$34,450	$38,750	$43,050	$46,500	$49,950	$53,400	$56,850

ATTACHMENT 2

HUD STATISTICS ON CALIFORNIA HOUSING ASSISTANCE PROGRAMS

HUD STATISTICS ON CALIFORNIA HOUSING ASSISTANCE PROGRAMS

California Public Housing			California Tenant Based Voucher			Total HHs/Tenants Calif.	
Number of HHs:	34,087	100%	Number of units with tenant based vouchers:	269,300	100%	303,387	100%
Number and Percentage HHs 30%	20,699	61%	Number and Percentage HHs 30%	141,432	53%	162,131	53%
Number and Percetnage HHs 50%	5,593	16%	Number and Percentage HHs 50%	45,732	17%	51,325	17%
Number and Percentage HHs 80%	1,872	5%	Number and Percentage HHs 80%	8,543	3%	10,415	3%
Number and Percentage HHs 81%+	391	1%	Number and Percentage HHs 81%+	431	0%	822	0%
Number and Percentage of Tenants No Income Data	5,532	16%	Number and Percentage of Tenants No Income Data	73,162	27%	78,694	26%
Average Annual HHs Income	$16,082		Average Annual HHs Income	$15,611			
Average HH size	2.7		Average HH size	2.5			
Average Monthly Total Tenant Payment (TTP)	$379		Average Monthly TTP	$368			
Percentage of HHs with Stays > 2 years	73%		Percentage of HHs with Stays > 2 years	78%			

Source: Compiled from Resident Characteristics Reports as of November 2007 found at

CERTIFICATE OF SERVICE

I hereby certify that a copy of **RESPONSE OF SOUTHERN CALIFORNIA GAS COMPANY TO THE ADMINISTRATIVE LAW JUDGE'S SECOND RULING SEEKING FURTHER INFORMATION FROM THE LARGE INVESTOR-OWNED UTILITIES' 2009 – 2011 LOW INCOME ENERGY EFFICIENCY/CARE APPLICATIONS** has been electronically mailed to each party of record of the service list in A.08-05-022, A.08-05-024, A.08-05-025, A.08-05-026. Any party on the service list who has not provided an electronic mail address was served by placing copies in properly addressed and sealed envelopes and by depositing such envelopes in the United States Mail with first-class postage prepaid.

Copies were also sent via Federal Express to Administrative Law Judge Sarah Thomas and Commissioner Dian Grueneich.

Executed this 7th day of July, 2008 at San Diego, California.

/s/ Jenny Tjokro
Jenny Tjokro