

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

Order Instituting Rulemaking on the Commission's
Proposed Policies and Programs Governing post-
2003 Low-Income Assistance Programs.

R. 04-01-006

And Related Matters:

A.05-06-005

A.05-06-009

A.05-06-012

A.05-06-013

**COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY AND SOUTHERN
CALIFORNIA GAS COMPANY SETTING FORTH PROPOSALS TO REDUCE
BILL IMPACTS FOR LOW INCOME CUSTOMERS**

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September 28, 2005

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Pursuant to "Notice of October 6, 2005 Full Panel Hearing in Los Angeles," dated September 13, 2005, San Diego Gas & Electric Company ("SDG&E") and Southern California Gas Company ("SoCalGas") file these comments setting forth proposals for reducing bill impacts for low-income customers during the coming months.

SDG&E and SoCalGas recognize the hardships that high winter gas costs will cause for low-income customers, and we are committed to finding solutions to mitigate these difficulties. We have been diligently evaluating ways to help our low-income customers through the winter and are finalizing specific proposals to benefit these customers. In this filing, we provide general information on our plans for low-income customers, and we will be prepared to present them in more detail at the Commission's full panel hearing on October 6, where we look forward to the discussion on how best to serve our low-income customers this winter.

SDG&E and SoCalGas are developing innovative approaches to assisting our low-income customers, which will provide tangible benefits to help them through the winter months. This involves enhancing ongoing efforts for our

customers, as well as implementing new initiatives this winter to: 1) provide additional financial assistance to customers experiencing difficulties paying their winter bills, 2) increase enrollment in energy efficiency and bill payment assistance programs, and 3) ensure that customers are informed about winter gas prices and available assistance programs. As part of this plan we will ask the Commission for expedited approval of several temporary changes to the Low-Income Energy Efficiency (LIEE) and California Alternate Rates for Energy (CARE) programs to enable more customers to participate in these programs.

Increased Bill Payment Assistance

SDG&E and SoCalGas have programs to assist customers experiencing temporary hardships in paying their energy bills, funded by shareholder, customer and employee contributions. SoCalGas' Gas Assistance Fund is available during winter months, and SDG&E's Neighbor-to-Neighbor program is available year-round.

To address the increased difficulties facing low-income customers this winter, SDG&E and SoCalGas' shareholder contributions for these programs will be quadrupled from previous years, with a total of \$1 million available for bill payment assistance for our customers. Customer and employee contributions will be matched on a four-to-one basis, up to \$1 million. This could result in over \$1.2 million being available to assist SDG&E and SoCalGas' low-income customers in paying their winter bills. We also are investigating other sources in the communities that may be available to obtain additional funds for these programs.

Flexible Credit and Collection Procedures

SDG&E and SoCalGas recognize that low-income customers may face hardships in meeting due dates for winter bill payments, and we will provide additional assistance through special credit policies for these customers. All efforts will be made to avoid service interruption to these customers this winter, and we will be proactive in assisting our low-income customers with their bill payments.

We will initiate a no-shut-off policy through the winter for low-income customers who make a minimum payment on their monthly bills. Arrangements will be made with these customers to design payment plans that enable them to have extended time to pay for the amounts in arrears. We will ensure that they receive assistance available to them through programs that can help them with their bill payments. We also will suspend deposit requests for CARE and Medical Baseline customers (deposits are approximately twice the average monthly bill) during the winter, providing additional relief for these customers.

Additional outreach will be implemented for CARE and Medical Baseline customers in arrears to provide them more assistance. We will proactively contact these customers by telephone or letter, rather than making a field collections call, to offer payment arrangements, level pay plan, and other potential payment assistance. We will work with these customers and exhaust all options in helping them with their bills, including identifying other community resources and programs that may be available to them.

SDG&E and SoCalGas will contact before the winter those low-income customers with a history of problems paying their bills and who have frequently required payment arrangements. These customers will be provided information on programs that can assist them and will be encouraged to contact us for additional help if needed.

Both SoCalGas and SDG&E plan communication campaigns to ensure that customers are aware of the Level Pay residential bill payment option. This payment option can help to better balance payments throughout the year, making energy bill payments more predictable and deferring the full impact of rising prices. Additionally, our telephone representatives routinely alert customers who call regarding payment plans of the availability of this payment option.

Increased CARE and LIEE Participation

An important element of the plan is to enroll as many eligible customers as possible in the CARE and LIEE programs, as these programs provide significant benefits to low-income customers. SDG&E and SoCalGas have evaluated the programs to determine ways to simplify the enrollment process and will propose

several temporary changes for their CARE and LIEE programs to be implemented on a pilot basis during the winter months. For LIEE, these changes will allow more customers to begin realizing energy use reductions during the winter months through increased participation in the program. We are evaluating the temporary suspension of certain program requirements for income documentation to allow customers to be determined eligible and thus served more quickly. We also are considering the implementation of targeted pilot programs for installation of the most energy-efficient measures.

Program changes for CARE are targeted to eligible customers who may not enroll in CARE under current program procedures or who may be dropped from CARE for not responding to certain program requirements. These involve changes to recertification and post-enrollment verification procedures and the enrollment of some customers by telephone. In addition, we are considering revising the CARE income requirements to match those of LIEE, where seniors 60 and over and disabled customers can have incomes up to 200% of federal poverty guidelines.

The proposals for CARE and LIEE program changes will be filed with the Commission the week of October 3, with expedited approval requested so that the temporary winter measures can be implemented starting November 1.

Increased Outreach

SDG&E and SoCalGas implement a variety of outreach methods to low-income customers on an ongoing basis, and for the winter these efforts will be substantially increased and new methods added. Low-income customers will be contacted in several ways with information on the winter gas costs, conservation measures, and available programs and services. This outreach will be targeted to agencies that provide services to low-income customers and to customers directly through additional efforts. New collateral materials will be developed to provide information on other local community resources to assist customers as well as SDG&E and SoCalGas' programs.

SDG&E and SoCalGas partner with a number of community agencies to help low-income customers and to promote the LIEE and CARE programs. Communications with these agencies will be increased to keep them informed and involved in assisting low-income customers. SDG&E and SoCalGas will send the agencies letters, email notes and newsletters, and collateral materials to provide to customers. We will communicate with the agencies multiple times throughout the winter, in meetings and individual visits. We also will partner with agencies for special events and projects (such as food drives) to provide information and assistance to customers.

Low-income customers will be contacted directly during the winter through additional direct mail campaigns for targeted customers, such as CARE and LIEE customers with high winter gas usage and those with difficulty paying bills. In addition, targeted direct mail campaigns for non-CARE and non-LIEE customers will include information on winter gas costs and payment assistance programs. Low-income customers will receive this information at all events and presentations, which will be increased during the winter months, including a campaign to reach more customers through churches and other houses of worship.

Media Promotion

SDG&E and SoCalGas plan multiple outreach efforts to low-income customers through the media, including print, radio and television. Press releases, stories in local publications, advertising, media interviews, articles in community agency and employer newsletters, and participation in radio news/talk shows all will be increased during the winter months. We will enlist the support of local media, consumer groups, and community agencies to inform more low-income customers of available programs to help them through the winter.

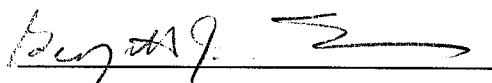
Bill Inserts and Messages

SDG&E and SoCalGas plan to provide information on winter gas prices, conservation, and assistance programs several times throughout the winter through bill inserts, messages on bills, and articles in the customer bill newsletters.

Employee Campaigns

SDG&E and SoCalGas will enlist the assistance of their employees in reaching out to low-income customers this winter through providing employees with information on assistance programs and involving employees in outreach activities. Field employees will be provided information to give customers on assistance programs. We also are developing employee campaigns to target CARE enrollments and to solicit contributions to the Gas Assistance Fund and Neighbor-to-Neighbor programs.

Respectfully submitted,



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September 28, 2005

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Comments of San Diego Gas & Electric Company and Southern California Gas Company Setting Forth Proposals to Reduce Bill Impacts for Low Income Customers has been served electronically on all parties of record on the Commission's service list in proceeding R.04-01-006, et al.

Executed this 28th day of September 2005 at San Diego, California.



Laurie Delaney

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

Proceeding: R0401006 - PUC - LOW-INCOME PRO

Filer: CPUC

List Name: LIST

Last changed: September 23, 2005

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