

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

Application of Southern California Edison Company (U 338E) for Approval of its Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets for Program Years 2015-2017.

And Related Matters.

Application 14-11-007
(Filed November 18, 2014)

Application 14-11-009
Application 14-11-010
Application 14-11-011

**ANNUAL REPORT ACTIVITY OF SAN DIEGO GAS & ELECTRIC COMPANY
(U 902 M) ON LOW INCOME ASSISTANCE PROGRAMS FOR 2018**

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May 1, 2019

SAN DIEGO GAS & ELECTRIC COMPANY

**ANNUAL REPORT ACTIVITY
ON LOW INCOME ASSISTANCE
PROGRAMS**

2018 RESULTS

LOW INCOME ASSISTANCE PROGRAMS ANNUAL REPORT

TABLE OF CONTENTS

2018 LOW INCOME ANNUAL REPORT EXECUTIVE SUMMARY	2
1 ENERGY SAVINGS ASSISTANCE PROGRAM EXECUTIVE SUMMARY	5
1.1 Alignment of Energy Savings Assistance Program with Strategic Plan Goals and Strategy.....	9
1.2 Energy Savings Assistance Program Overview	15
1.3 Marketing, Education, and Outreach.....	15
1.4 Energy Savings Assistance Program Customer Enrollment	23
1.5 Disability Enrollment Efforts	24
1.6 Leveraging Success, Including LIHEAP.....	28
1.7 Integration Success.....	33
1.8 Workforce Education & Training.....	37
1.9 Legislative Lighting Requirements Status	38
1.10 Studies	39
1.11 Pilots.....	42
1.12 “Add Back” Measures	44
1.13 Low Income Working Groups.....	44
1.14 Annual Public ESA Program and CARE Meeting.....	48
1.15 Multifamily Properties	49
2 CARE EXECUTIVE SUMMARY	52
2.1 Participant Information.....	57
2.2 CARE Program Summary	62
2.3 CARE Program Costs.....	64
2.4 Outreach	68
2.5 Processing CARE Applications.....	84
2.6 Program Management	86
2.7 Pilots.....	87
2.8 Studies	87
2.9 CARE Restructuring Working Group	88
2.10 Miscellaneous: Describe coordination efforts with the California Advanced Services Fund’s new Broadband Public Housing Account.	88
3 CARE EXPANSION PROGRAM.....	88
3.1 Participant Information.....	88
3.2 Usage Information	89
3.3 Program Cost.....	89
3.4 Outreach	90
3.5 Program Management	91

4	FUND SHIFTING.....	91
4.1	Report Energy Savings Assistance Program fund shifting activity that falls within rules laid out in Section 20.1 of D. 08-11-031 as modified by D.10-10-008, 16-11-022, and D.17-12-009.	91
5	COMMONLY USED ACRONYMS	93
6	APPENDIX A – SAMPLE CAMPAIGN – ESA PROGRAM.....	Error! Bookmark not defined.
7	APPENDIX B: MF WORKING GROUP ANNUAL REPORT – 2018 ACTIVITY.	Error! Bookmark not defined.
8	APPENDIX C: MID-CYCLE WORKING GROUP – 2018 ACTIVITY.	Error! Bookmark not defined.
9	APPENDIX D – SAMPLE COLLATERAL MATERIALS – CARE PROGRAM...	Error! Bookmark not defined.
10	APPENDIX E: ENERGY SAVINGS ASSISTANCE PROGRAM TABLES AND CARE TABLES	Error! Bookmark not defined.

2018 LOW INCOME ANNUAL REPORT EXECUTIVE SUMMARY

In 2018, SDG&E successfully met enrollment goals for both the CARE and ESA Programs. Through careful coordination of efforts between both programs, and by integrating both programs into the holistic suite of offers for all residential customers, SDG&E provided assistance to a wide range of eligible customers in order to meet commission goals while helping to relieve customers of some of their energy burden.

For the ESA Program, by year end, SDG&E exceeded its homes treated goal by treating 21,387 homes. Of those, 7,785 were first touch homes and 13,602 were retreatment homes. SDG&E managed the program in a highly cost-effective manner, making judicious use of ratepayer dollars to spend only \$22,896,182 (68%) of its authorized 2018 ESA budget. The program achieved 84% of the program energy savings target for kWh, 169% for kW and 47% for therms saved. In 2018, a combination of effective and targeted program outreach, ongoing collaboration and leveraging of other low income programs and services and coordinated communications between the ESA, Energy Efficiency (EE) and other SDG&E programs led to attainment of the annual program goal and kept SDG&E on track for meeting the 2020 strategic goal to give all eligible customers the opportunity to participate in the ESA Program.

In 2018, SDG&E reached the CARE Program eligibility target of 90% for the first time in recent program history and at year-end had surpassed the target with almost 92% of eligible customers enrolled in the bill-savings discount. As with the ESA Program, the CARE Program underspent the administrative budget, utilizing \$5,852,015 of administrative funds, or 80% of budget for the year. In total, CARE customers received \$126,165,599 in subsidies and benefits from the program in 2018. The CARE Program was the leading offer of SDG&E's customer assistance marketing campaign, which sought to connect with low income customers across a diverse population including hard-to-reach customers, seniors, customers with special needs and

multilingual/multicultural customers. The campaign drove eligible customers to apply for CARE, and through SDG&E's coordinated efforts, CARE enrollments in our system were automatically converted into ESA program leads. In 2018, the Customer Assistance Programs campaign included print, streaming TV, digital media, bill inserts, ethnic marketing, email, and direct mail. This was in addition to door-to-door, live call, and outreach through SDG&E's Energy Solutions Partner network and all of the CARE capitation agencies that help to enroll customers in the CARE Program. Of all efforts to enroll eligible customers in CARE, the "Live CARE Call Campaign" administered by The Harris Group (THG) was particularly effective, resulting in over 25,000 submitted CARE applications and enrollment of over 17,250 new CARE customers and 6,730 CARE re-certifications in 2018.

For both the ESA and CARE Programs, SDG&E found great value in leveraging with partners such as the California Department of Community Services & Development (CSD). This partnership demonstrated SDG&E's commitment to utilize every feasible effort to reach out to customers in need. SDG&E promoted the CSD's Low Income Home Energy Assistance Program (LIHEAP) bill payment assistance and weatherization services programs, and included CSD LIHEAP's phone number on SDG&E's CARE applications and program materials so that customers could have direct contact information to access services. SDG&E's CARE staff also informed customers about services offered by CSD and referred customers to CSD for additional bill assistance through the Home Energy Assistance Program (HEAP). Lastly, SDG&E's agreement with 2-1-1 San Diego included a directive for referral to LIHEAP agencies Campesinos Unidos, Inc. (CUI) and Metropolitan Area Advisory Committee (MAAC), as appropriate. In 2018, 2-1-1 San Diego handled approximately 25,120 utility-related calls and referred 16,903 of those to the aforementioned LIHEAP agencies.

The Expanded CARE Program successfully served approximately 640 facilities and over 7,100 customers in 2018 with a bill discount. The Expanded CARE Program utilized targeted and coordinated outreach via SDG&E's skilled and knowledgeable customer team, including assigned account executives, energy solutions advisors, customer contact center representatives and outreach advisors. These employees worked directly with facilities who may be eligible for Expanded CARE and with Community Based Organizations (CBOs) who work directly with customers who may be eligible.

During 2018, SDG&E shifted CARE funds as allowed, leveraging excess funds in the General Administration category to cover budget overages in the Processing, Certification and Recertification category. A total of \$99,637 was shifted. There was no ESA Program or CARE Program fund shifting activity that occurred that fell outside of the fund shifting rules laid out in Section 20.1 of D.08-11-031, as modified by D.10-10-008, D.16-11-022, and D.17-12-009.

ENERGY SAVINGS ASSISTANCE PROGRAM ANNUAL REPORT

1 ENERGY SAVINGS ASSISTANCE PROGRAM EXECUTIVE SUMMARY

SDG&E's ESA Program¹ offers its low income natural gas and electric customers weatherization services, energy efficient lighting, energy efficient appliances, energy education, and other services at no cost. In recognition of the changes in the energy markets and the environment, as well as the needs of low income customers and the larger community, the California Public Utilities Commission (Commission) updated its policy objectives for the ESA Program in Decision (D.) 07-12-051, stating:

[T]he key policy objective for the LIEE programs, like that of our non-LIEE energy efficiency programs, is to provide cost-effective energy savings that will serve as an energy resource and to promote environmental benefits. We retain our commitment to ensuring the LIEE programs add to the participant's quality of life, which implicates equity, energy affordability, bill savings, and safety and comfort for those customers who participate in the LIEE programs.²

To achieve these objectives, the Commission adopted an ESA Program initiative “to provide all eligible LIEE customers the opportunity to participate in LIEE programs and to offer those who wish to participate, all cost-effective energy efficiency measures in their residences by 2020.”³

The long-term California Energy Efficiency Strategic Plan (Strategic Plan) lays out two goals in achieving the vision: 1) by 2020, all eligible customers will be given the opportunity to

¹ The Energy Savings Assistance Program was formerly known as the Low-Income Energy Efficiency Program or “LIEE”.

² D. 07-12-051 at p. 2.

³ *Id.*

participate in the ESA Program; and 2) the ESA Program will be an energy resource by delivering increasingly cost-effective and longer-term savings.

On March 28, 2014, Southern California Edison Company (SCE) filed a motion on behalf of itself and other interested parties, requesting an extension of time for the large investor-owned utilities to file their 2015-2017 Applications until January 30, 2015⁴ and requesting a one-year bridge funding period.⁵ The motion stated that bridge funding will afford the investor-owned utilities (IOUs) sufficient time to incorporate those changes in their portfolios without putting the continuity of the ESA Program at risk. In D.14-08-030, the Commission granted the request for one-year bridge funding for program year 2015 to minimize disruption to the ESA and CARE Programs and to allow administrative flexibility to meet any unforeseen program needs during the bridge period, subject to the Commission's adopted fund shifting rules. The IOUs were directed to treat 2015 as the fourth program year and continuation of the 2012-2014 program cycle for fund shifting purposes.⁶

As directed in D.14-08-030, SDG&E filed its Application for the 2015-2017 program cycle on November 18, 2014. The funding for the 2015 program cycle was authorized in D.14-08-030. The Commission also issued D.15-12-024 and D.16-06-018, interim decisions for

⁴ Contingent on a Final Commission Decision on Phase II of the issues in A. 11-05-007, et. al. by no later than October 1, 2014.

⁵ Southern California Edison Company's (U338-E) Motion For An Extension Of Time To File Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets Applications for the Next Program Cycle and for a 2015 Bridge Funding Period, filed on behalf of Pacific Gas and Electric Company (PG&E), Southern California Gas Company (SoCalGas), San Diego Gas & Electric Company (SDG&E), Natural Resources Defense Council (NRDC), The Utility Reform Network (TURN), Office of Ratepayer Advocates, (ORA), Proteus Incorporated (Proteus), The East Los Angeles Community Union (TELACU), Energy Efficiency Council (EEC), Maravilla Foundation, and the Association of California Community and Energy Services (ACCES) (collectively Joint Parties).

⁶ D.14-08-030, Ordering Paragraph 3.

program year 2016 to authorize bridge funding until a final decision was rendered by the Commission.

On November 21, 2016 the Commission issued D.16-11-022 which approved SDG&E's Low-Income Application (A.) 14-11-009 filed on November 18, 2014. D.16-11-022 set forth the parameters for the administration of and participation in the ESA and CARE Programs for years 2017 through 2020. The Commission extended the program cycle for these programs from 2017 through 2020 considering the delays resulting in bridge funding decisions, the significant program changes adopted in D.16-11-022, and the changes in electric rate structure as default Time of Use rates are implemented.⁷

On March 24, 2017, the IOUs filed a Joint Petition for Modification (PFM) of D.16-11-022 requesting changes, corrections, and clarifications to the decision. On April 24, 2017, California Housing Partnership Corporation, the Natural Resources Defense Council, and the National Consumer Law Center filed a joint PFM recommending modifications to D.16-11-022. The Commission issued D.17-12-009 resolving the PFM of D.16-11-022 for the ESA and CARE Programs through program years 2017-2020.

This report provides information on SDG&E's ESA Program accomplishments and expenditures for program year 2018. In 2018, the ESA Program treated 21,387 homes, or 100% of the 2018 goal. The program spent \$22,780,528 of its authorized 2018 budget, plus \$115,654 from 2009-2016 unspent funds totaling \$22,896,182. At year end, there was a total of \$8,851,393 in unspent 2018 gas and electric ESA Program funds which represents \$5,931,205 unspent gas funds and \$2,920,188 unspent electric funds. These 2018 unspent funds represent authorized 2018 budget minus 2018 expenditures and does not reflect the dollars in SDG&E

⁷ D.16-11-022, p. 6.

collections in its gas and electric balancing accounts. SDG&E's collections in its ESA Program balancing accounts at 2018 year-end totaled \$37,077,411 in unspent electric and gas funds (represents prior years 2009-2016 unspent funds, plus 2017 and 2018 unspent funds) which represents \$16,299,641 over-collection unspent gas funds and \$20,777,770 over-collection unspent electric funds. Of the noted over-collection, Resolution E-4884 authorized \$12,959,793 to be utilized for specific new initiatives above and beyond the base ESA Programs. The remaining balancing account available funds total \$3,861,378 as outlined in ESA Table 12 in the attachments. D.16-11-022, as modified by D.17-12-009, directs the IOUs to use unspent ESA Program funds to achieve program and policy objectives and to offset future revenue collections.⁸ In meeting the Commission's program and policy objectives in 2018, SDG&E exceeded its ESA program homes treated goal and achieved its policy objectives to provide all eligible low income gas and electric customers an opportunity to participate in the ESA program. SDG&E believes the underspending in part is attributed to SDG&E's projection of the measure installations compared to the actual measure installations. It is difficult to determine the measures a dwelling may need until the contractor is at the home to make an assessment. Consistent with Commission directive to offset future revenue collections by using unspent ESA program funds, beginning in January 2019, SDG&E will partially offset its electric revenue collections in the amount of \$10 million⁹ using unspent electric funds and partially offset its gas

⁸ Section 5.1.6. in D.16-11-022 and D.17-12-009 states "All current unspent funds shall be utilized to fund program and policy objectives adopted in this decision, and to offset the program collections that would otherwise have been required."

⁹ The Commission approved SDG&E Advice Letter 3280-E which requested the electric revenue requirement effective January 1, 2019.

revenue collections in the amount of \$10 million¹⁰ using unspent gas funds during the 2019 program year.

1.1 Alignment of Energy Savings Assistance Program with Strategic Plan Goals and Strategy

The long-term Strategic Plan vision for the ESA Program is to have 100% of all eligible and willing low-income customers receive all cost-effective ESA Program measures by 2020. The Strategic Plan lays out two goals in achieving the ESA Program vision: 1) by 2020, all eligible customers will be given the opportunity to participate in the ESA Program, and 2) the ESA Program will be an energy resource by delivering increasingly cost-effective and longer-term savings.

During 2018, SDG&E continued to have great success moving towards the long-term Strategic Plan vision to provide ESA Program measures to all eligible and willing low income customers and to provide cost effective and long-term savings. SDG&E is currently on track to meet its 2020 homes treated goal. In the table below, it reflects the 2018 through 2020 homes treated goal authorized each year for homes receiving first-time treatment. This cumulative 2018 through 2020 goal is 16,540 homes.¹¹ In 2018, SDG&E treated 7,785 homes out of the total 16,540 first-time treatment and has a total of 8,755 homes remaining to be treated over the 2019 and 2020 program years.

¹⁰ The Commission approved SDG&E Advice Letter 2713-G which requested the gas revenue requirement effective January 1, 2019.

¹¹ The Commission's Energy Division approved SDG&E Advice Letter 3250-E/2688-G which, among other things, increased the homes treated goal for 2019 and 2020 adding 243 homes per year.

2018 - 2020 Household Treatment Goals

	Authorized			
	2018	2019	2020	Total
First-time Treatment	11,667	4,630	243	16,540

In addition to the goals to serve all eligible customers by 2020, D.17-12-009 authorized changes to the ESA Program design to allow more flexibility to accomplish ESA Program statutory goals and “reduce hardship on low-income customers in a cost-effective manner.”¹² The changes included the inclusion of energy savings targets, the elimination of the three-measure minimum (3MM) rule, the elimination of the go-back rule, removal of measure caps, authorization to leverage CSD multifamily in-unit with ESA Program funds, and the authorization of treating common areas of eligible deed-restricted multifamily properties.

1.1.1 Please identify the IOU strategies employed in meeting Goal 1: Improve Customer Outreach

SDG&E uses various strategies to help target and market to customers and improve customer outreach efforts. In addition to using customer analytics, SDG&E has also built a large network of partnering agencies which have helped in providing customers with valuable information regarding the ESA Program. Additionally, SDG&E has partnered with the IOUs to streamline In-Home Energy Education and training materials for the program, which will make sure there is consistent program messaging to customers throughout the State.

¹² D.17-12-009, page 6.

In the table immediately following, SDG&E has provided the activity for 2018 based upon the Strategic Plan update in 2011 to reflect the long-term strategy implementation plan and timeline.

Implementation Plan and Timeline		
Strategies	Term 2017-2020	IOU strategy employed this program year
<p>1: Strengthen program outreach using segmentation analysis and social marketing tools.</p>	<ul style="list-style-type: none"> • Continue to assess and evaluate customer behavior and energy savings; improve upon outreach to eligible communities. 	<ul style="list-style-type: none"> • Used a coordinated and integrated mix of general awareness channels, targeted campaigns, and collaborative partnerships. • Promoted ESA as the secondary or next best offer to qualifying CARE customers. • Completed development of a new statewide energy education booklet that customers receive as part of the in-home assessment. The energy education booklet was the primary tool for this process in 2018. The leave-behind booklet includes information on energy costs and behavioral changes that can lead to a reduction in energy and water costs. It also includes appliance safety tips and information. The booklet is available in both English and Spanish.
<p>1.2: Develop a recognizable and trustworthy Brand/Tagline for the programs.</p>	<ul style="list-style-type: none"> • Evaluate progress/refine strategy. 	<ul style="list-style-type: none"> • In 2018, the IOUs built on the established ESA brand and collaborated on a statewide energy education booklet to continue to drive recognition. The statewide approach ensures that a consistent message is being provided to all ESA customers across the state. A fact sheet was also developed as an insert to provide utility specification information to

Implementation Plan and Timeline		
Strategies	Term 2017-2020	IOU strategy employed this program year
		customers. In 2019, SDG&E plans to add research questions to monthly surveys regarding brand recognition.
1.3: Improve program delivery	<ul style="list-style-type: none"> • Ongoing: Use information from segmentation analysis to achieve efficiencies in program delivery. • Ongoing: Leverage with Local, State, and Federal agencies as well as other organizations to increase seamless coordination, efficiency and enrollment. 	<ul style="list-style-type: none"> • SDG&E used the most current Athens Research data in conjunction with SDG&E’s recent residential segmentation data to identify high opportunity areas to target for outreach efforts. SDG&E also identified high population density of targeted audiences (i.e., seniors) by zip code and targeted customers within these opportunity areas (in particular, the hard to reach customers) through community-based outreach activities. • SDG&E continued to partner with local LIHEAP agencies to leverage enrollment opportunities for the ESA Program. Both local San Diego LIHEAP agencies partner with SDG&E as ESA contractors and leverage enrollment opportunities whenever possible. In January 2018, SDG&E provided CSD with usage information for SDG&E customers who participated in the LIHEAP process. SDG&E also partners with San Diego 2-1-1 to offer ESA Program services when a client is calling to receive support from Local or Federal programs.
1.4: Promote the growth of a trained ESA Program workforce.	<ul style="list-style-type: none"> • Implement ESA Program workforce 	<ul style="list-style-type: none"> • In 2018, SDG&E worked with PG&E, SCE and SCG to begin developing a computer-based

Implementation Plan and Timeline		
Strategies	Term 2017-2020	IOU strategy employed this program year
	education and training. <ul style="list-style-type: none"> • Coordinate ESA Program workforce and service providers with broader market. 	training module, which could be utilized statewide. The utilities are targeting a 2019 implementation. <ul style="list-style-type: none"> • SDG&E partnered with the Workforce Education and Training team to offer training to ESA Program contractors. SDG&E also provided ESA Program contractors with information on available trainings relevant to their employees.

1.1.2 Please identify the IOU strategies employed in meeting Goal 2: Energy Savings Assistance Program is an Energy Resource

SDG&E has leveraged opportunities, both internally and externally, to improved program participation in order to meet the program goals. Through partnerships with local water agencies and state agencies, leveraging internal programs, and the utilization of data analytics, SDG&E maximized opportunities to offer the ESA Program to its customers. In the table immediately following, SDG&E has provided the activity for 2018 based upon the Strategic Plan update in 2011 to reflect the long-term strategy implementation plan and timeline.

Implementation Plan and Timeline		
Strategies	Term 2017 – 2020	IOU strategy employed this program year
2.1: Increase collaboration and leveraging of other low income programs and services	<ul style="list-style-type: none"> • Continue to expand partnerships with stakeholders and seek new opportunities for data sharing. 	<ul style="list-style-type: none"> • SDG&E continued to partner with local LIHEAP agencies to leverage enrollment opportunities for the ESA Program. In addition, SDG&E partnered with San Diego County Water Authority

Implementation Plan and Timeline		
Strategies	Term 2017 – 2020	IOU strategy employed this program year
		(SDCWA) to develop a leveraging process for customers receiving water savings measures as part of the ESA Program. Additional information can be found in Section 1.6.4.
2.2: Coordinate and communicate between ESA Program, energy efficiency and DSM Programs to achieve service offerings that are seamless for the customer.	<ul style="list-style-type: none"> Continually reevaluate and update programs to take advantage of new technologies. 	<ul style="list-style-type: none"> The ESA Program partnered with the EE and Demand Response (DR) programs to identify opportunities to offer new measures into the program. In 2018, as part of the Mid-Cycle Advice Letter filing, SDG&E proposed the addition of pool pumps and Smart Thermostats for greater energy savings opportunities.
2.3: Provide low income customers with measures that result in the most savings in the ESA Program.	<ul style="list-style-type: none"> Continue to evaluate. Assess opportunities to incorporate new energy efficiency measures into the ESA Program, e.g., plug-load reduction, new HVAC technology. 	<ul style="list-style-type: none"> As part of the Mid-Cycle review, and in consideration for the program delivery beyond 2020, SDG&E continued to evaluate opportunities by working with SDG&E energy efficiency engineers, Emerging Technologies staff, and other utilities to identify opportunities to provide customers with greater energy savings.
2.4: Increase delivery of efficiency programs by identifying segmented concentrations of customers.	<ul style="list-style-type: none"> Continue to evaluate. Evaluate approach and determine whether additional segments are needed. 	<ul style="list-style-type: none"> SDG&E used Residential Segmentation data overlaid with the Athens Research Study to effectively identify customers and manage the program. See Section 1.3 for detailed Market Segmentation information.

1.2 Energy Savings Assistance Program Overview

1.2.1 Provide a summary of the Energy Savings Assistance Program elements as approved in D. 14-08-030, D. 16-11-022, and D. 17-12-009:

Program Summary			
	Authorized Budget / Planning Assumptions	Actual	%
Budget ¹³	33,744,223	22,896,182	68%
Homes Treated	21,332	21,387	100%
kWh Saved	6,560,000	5,514,622	84%
kW Demand Reduced	2,148	3,627	169%
Therms Saved	380,000	178,048	47%
GHG Emissions Reduced (Tons)	5,831	4,075	70%

1.3 Marketing, Education, and Outreach

1.3.1 Provide a summary of the geographic segmentation strategy employed, (i.e., tools and analysis used to segment “neighborhoods,” how neighborhoods are segmented and how this information is communicated to the contractor/CBO).

SDG&E understands the importance of customer segmentation, as it enables SDG&E to identify hard-to-reach customers and gain insights to barriers and solutions. When organizing SDG&E’s residential population into detailed profiles of individual segments, there are several ways to describe them by energy-related attitudes and behaviors, including: demographics, energy conservation behaviors, media consumption habits, lifestyle preferences, mobile usage, propensity to engage and more.

¹³ Commission Disposition Letter dated December 27, 2018 approved SDG&E Advice Letter 3250-E/2688-G which updates 2018 authorized budgets (based budget plus unspent funds), homes treated, and energy savings.

SDG&E used a variety of factors to help identify customers that are more likely to qualify for the ESA Program. These include using the most current Athens Research Study and SDG&E's recent Residential Segmentation model. The purpose of the refresh was to modernize SDG&E's residential customer segments to account for market changes and ever-changing customer dynamics. This segmentation allowed for targeted messaging to customers with high potential for eligibility. Likewise, the utilization of customers' preferred channels of communication enabled SDG&E to drive customer enrollment. A series of communication tactics such as direct mail, outbound calling, and door-to-door canvassing were deployed to potentially eligible customers within specific neighborhoods. In addition, SDG&E's branch office locations continue to provide customers with the ability to apply for the ESA Program.

An example of this multi-touch integrated approach is the 2018 ESA Program targeted marketing campaign in which SDG&E sent 115,666 emails and/or direct mail postcards to currently enrolled CARE customers, encouraging them to save more through the ESA Program. SDG&E then provided a canvassing list from the direct mail list to its three ESA Program outreach contractors, providing ESA Program penetration rates and PRIZM10 code information for each zip code. See Appendix A for a sample of this campaign.

SDG&E's outreach team engaged its network of more than 250 Energy Solutions Partners, made up of CBOs, to reach specific geographic areas and multicultural communities. These partners were established based on zip code data that was obtained to identify organizations that were in areas within the low-

income population and in various pockets throughout San Diego. These areas include harder to reach rural, multi-cultural / multi-lingual and special needs communities. The ability for CBOs to penetrate these harder to reach customer segments was very valuable in securing enrollments. These partner organizations have established relationships and trust with their communities, so SDG&E coordinated tactics with the CBOs to promote its CARE, Family Electric Rate Assistance (FERA), and ESA Programs to their customers, leading to more enrollment opportunity. These tactics included presentations, events, workshop trainings and messaging to help increase awareness and to drive enrollments in the ESA Program. As part of its customer engagement outreach plan, SDG&E educated its partners with training materials on the ESA Program, including utilizing the CARE, FERA, and ESA Programs' online enrollment process to help streamline the enrollment process for their organization. The Energy Solutions Partner Network¹⁴ leveraged both traditional messaging (e-mail, newsletters, direct mail) and social media (Facebook, Twitter) platforms to effectively deliver tailored messages to customers from organizations they are aligned with and trust. SDG&E also worked with our Energy Solutions Partners to provide education and engagement opportunities at over 750 presentations and events throughout its service territory. At the events with multicultural/multilingual partners or communities, SDG&E secured bilingual representatives to communicate

¹⁴ SDG&E's Energy Solutions Partner Network consists of over 250 local, grassroots and community based organizations.

effectively with non-English speaking customers who often represent SDG&E's hardest-to-reach populations.

1.3.2 Provide a summary of the customer segmentation strategies employed (i.e. tools and analysis used to identify customers based on energy usage, energy burden and energy insecurity) and how these customer segments are targeted in the Whole Neighborhood Approach to program outreach.

SDG&E continued to utilize its Residential Segmentation data overlaid with the Athens Research Study. Using this information, SDG&E has distinct segments among residential customers based on various factors such as:

- Perceived ability and willingness to take action to change energy consumption patterns and behaviors;
- Motivations for adopting new behaviors, including underlying values that drive decisions;
- Attitudes toward energy efficiency and environmental issues;
- Affinity for new technologies and energy management tools;
- Technology and communication tools used (internet, smart phones, etc.); and
- Limited or specialized communications needs and preferences.

SDG&E continued to use the creative execution in 2018 that was newly developed for its 2017 campaign. The 2018 campaign focused on informing qualified customers on how they can save on their energy through an emotional connection with customers by giving them one less thing to worry about. The campaign ran in English, Spanish and Asian languages and included TV (live plus streamed), newspaper, digital (including paid search), email, direct mail and bill inserts.

SDG&E Outreach and Assessment contractors also utilized target segmentation to develop lead lists. These lists are utilized to canvass neighborhoods and provide a “whole neighborhood approach” during canvassing efforts.

1.3.3 Describe how the current program delivery strategy differs from previous years, specifically relating to Identification, Outreach, Enrollment, Assessment, energy Audit/Measure Installation, and Inspections.

Outreach and Enrollment Strategies:

In 2018, outreach and enrollment strategies remained similar to 2017, utilizing a mix of strategies to focus on first-touch customers and customers eligible for retreatment. SDG&E continued to focus on customers with the most opportunity to benefit from retreatment, those enrolled prior to 2009 higher users, and customer who received some ESA Program measures in the past but did not receive full weatherization. SDG&E also continued to focus on converting more enrollments to weatherization and noticed a significant improvement in weatherization conversion rates, with over 40% of enrollments receiving full weatherization.

In-Home Education Strategies:

In compliance with D.16-11-022 and D.17-12-009, SDG&E worked with the other IOUs to develop collateral materials for the new statewide In-Home Education and contractor training collateral materials. The goal was to have consistent program delivery from all participating ESA Program contractors statewide. The IOUs developed individual utility inserts for information specific to their respective utility, such as My Account which is specific to SDG&E. The

materials were developed in English and Spanish languages and five additional languages, Chinese, Vietnamese, Hmong, Korean and Russian. Feedback from contractors on the new format has been positive.

In 2018, the utilities continued to work on statewide contractor training modules and anticipate completing the modules in early 2019.

Audit/Measure Installation:

In D.16-11-022 and D.17-12-009, SDG&E received Commission approval to offer several new measures in the ESA Program. Those new measures included, low emission diode (LED) lighting, Tier II smart power strips, heat pump water heaters, energy efficient fan controllers, thermostatic tub spouts, and prescriptive duct sealing. SDG&E began integrating these measures into the program in 2017, however challenges were identified that impacted the ability to offer some of the measures as planned. During 2018, SDG&E contractors were challenged in identifying opportunities to install the heat pump water heater measure, and the prescriptive duct sealing measure proved to be too costly to implement as intended. Additionally, thermostatic tub spouts have been slow to integrate due to contractor hesitation to change-out the tub spout. In 2018, SDG&E continued to work with the product vendor and participating ESA Program contractors to improve opportunity for the installation of the measure in order to maximize the energy savings provided to customers. The product vendor has been working on improving product installation training based on statewide field findings and will be providing updated contractor training in 2019.

1.3.4 Track Costs of AB 793 related Energy Management Technologies programs (identify all of the programs or initiatives that will be able to benefit from the availability of the end-use and electric usage profiles, and to coordinate with the relevant proceedings so that the relevant costs can be considered in those proceedings' cost-effectiveness decision-making), including costs for Energy Education

SDG&E is currently in the process of determining the benefits of end-use and usage profiles for energy education, TOU, and Advanced Metering Infrastructure related to energy management technologies. AB 793, among other things, directs the IOUs to incorporate energy management technologies into the ESA Program measure offerings.¹⁵

The following activities were conducted in 2018 related to energy management technologies and costs through the ESA Program have been reflected.

Energy Education:

In 2018, SDG&E, Pacific Gas and Electric Company (PG&E), SCE, and SoCalGas collaboratively developed a statewide energy education booklet, with each utility paying the printing cost for any new booklets needed by their respective contractors. SDG&E program contractors were instructed to transition to the new booklet once stock was depleted. In December 2018, SDG&E program contractors began ordering the new booklet, however those cost were incurred in 2019. The new booklet also included more targeted utility specific materials such as energy management information that was developed by each individual IOU. As part of In-Home Education, contractors are required to offer

¹⁵ D.17-12-009, Section 4.5.

My Account enrollment to customers and help walk the customer through the enrollment process. The SDG&E contractors walk customers through “Manage your energy use and save” leave behind, which includes information on My Account, benefits, smart home appliances and devices information, and Reduce Your Use rewards.

Time of Use:

Also, as described in Section 1.12.1 below, SDG&E began implementation of the Time of Use (TOU)/Smart Thermostat pilot (Pilot) to identify if Smart Thermostat technology can help customers manage their usage as they are transitioned to TOU rates.

On July 16, 2018, SDG&E filed Advice Letter 3250-E/2688-G, which requested authorization to include the Smart Thermostat measure as part of the ESA Program offering. On December 27, 2018, the Commission approved SDG&E’s Advice Letter 3250-E/2688-G with modifications approving the installation of Smart Thermostats through 2020, anticipating information from the above mentioned Pilot to help determine if Smart Thermostats are helpful as an energy management tool. In 2019, SDG&E will begin integrating the Smart Thermostat measure as part of the ESA Program offering. The cost of the Pilot through December 2018 was \$11,076. SDG&E anticipates most of the cost will be incurred in 2019.

End Use Load Profiles:

A Request for Proposals (RFP) for a vendor to provide load disaggregation services was released in March 2018. A contract was signed with

the selected bidder, Ecotagious Inc., in November 2018. The project scope is divided into two phases. Phase one will produce end use load profiles and a segmentation report for a sample of CARE customers in the PG&E, SCE and SDG&E service areas. Phase two will expand the analysis to a wider group of customers and provide delivery of results to customers and ESA contractors. The statewide group meets biweekly. In 2018, three milestones were met: the contract was signed, the project plan for phase 1 was finalized, and the customer segmentation design was completed. The results for phase 1 are expected by mid-year 2019. The costs incurred for this project in 2018 are shown in the following table.

Load Disaggregation Services Contract Costs for 2018

Total Costs Incurred in 2018	PG&E Portion (43.7%)	SCE Portion (46%)	SDG&E Portion (10.3%)
\$160,000	\$69,920	\$73,600	\$16,480

1.4 Energy Savings Assistance Program Customer Enrollment

1.4.1 Distinguish between customers treated as “retreated or go backs” and “first touch” customers so that the Commission has a clear idea of how many new customers the IOUs are adding to the Energy Savings Assistance Program.

In 2018, SDG&E’s ESA Program treated a total of 21,387 homes, of which 7,785 were first touch homes and 13,602 were retreatment home. The details regarding the homes treated can be found in ESA Program Table 2 of this report.

1.4.2 Please summarize new efforts to streamline customer enrollment strategies, including efforts to incorporate categorical eligibility and self-certification.

SDG&E used categorical eligibility and targeted self-certification for customers in identified low income areas based on PRIZM codes. Additionally, SDG&E leveraged CARE post-enrollment verification income documents, including CARE high users, to enroll ESA Program qualified customers. The ESA Program implemented a new system in 2018 which continued integration efforts between the CARE and ESA Programs. While new efforts were not initially implemented in 2018, the new system will allow additional opportunities to improve leveraging between the ESA Program and other EE programs in the future. Those opportunities will be evaluated and prioritized to make sure the values of the automation are appropriate.

1.4.3 If the IOU has failed to meet its annual goal of number of households served, please provide an explanation of why the goal was not met. Explain the programmatic modifications that will be implemented in order to accomplish future annual goals of number of households served.

In 2018, SDG&E exceeded its homes treated goal of 21,332 as directed in D.17-12-009, by treating 21,387 homes.

1.5 Disability Enrollment Efforts

1.5.1 Provide a summary of efforts to which the IOU is meeting the 15% penetration goal.

In 2018, SDG&E conducted outreach efforts with organizations serving disabled customers (listed below) to help improve ESA Program engagement. Throughout the year, SDG&E partnered with these organizations in nearly 40 events and presentations reaching over 1,900 customers. These events and

presentations took place to educate staff and volunteers of these organizations so they in turn, can help those in the community that utilize their services. Events were also held in partnership with these organizations to reach out directly to the communities they serve. Additional information about these organizations and our joint efforts can be found in the following sections below. SDG&E partnered with the following organizations in an effort to better reach disabled customers:

- 2-1-1 San Diego
- Access to Independence
- County Health and Human Services Agency
- Deaf Community Services
- Elder Help
- Foundation for Senior Care
- Horn of Africa
- Julian Cuyamaca Resource Center
- La Jolla Community Center
- La Maestra
- Lawrence Family Jewish Services
- Mamas Kitchen
- Meals on Wheels
- North County Health Services
- Park Avenue Health
- St. Madelein Sophie's Center
- Unions of Pan Asian Communities (UPAC)

1.5.2 Describe how the Energy Savings Assistance Program customer segmentation for ME&O and program delivery takes into account the needs of persons with disabilities.

SDG&E's ME&O activities are designed to specifically support the needs of customers with disabilities. SDG&E has worked diligently to partner with various CBOs, including nonprofit organizations, community clinics, and county/city agencies that provide direct services to this customer segment providing education and engagement opportunities in support of the ESA Program. Partner segments with outreach activities include:

- Hearing & Vision

- I. San Diego Center for the Blind.

- Delivered presentations about SDG&E's energy solutions and services that include low income and Medical Baseline Programs in English and Spanish languages.

- II. Deaf Community Services

- Resource initiatives and programs that affect or benefit the deaf community in SDG&E's service territory.

- a. Provided an annual in-service presentation at one of the organization's monthly staff meetings listing out a comprehensive overview of:

- i. Programs, services, and online resources.

- ii. Residential rebates, initiatives, energy savings tips, and programs.

- b. Participated with a booth at Deaf Community Services annual Deaf Festival.

- c. Hosted Deaf Community Services at SDG&E's annual partner roundtable that included a sign-language interpreter where SDG&E provides another opportunity to learn about all the services available to residential customers.

- d. On a monthly basis all Deaf & Community Services marketing materials are shared through all of its communication channels.
- e. Worked with Deaf & Community Services to produce short news videos in American Sign Language (ASL) and closed captioning to help reach out to their stakeholders and patrons.

III. Mental & Health & Services Several Energy Solutions Partners offered services targeting mental health.

- a. Partners attended SDG&E Partner Roundtable events.
- b. SDG&E conducted presentations to partners on CARE, FERA and ESA Programs.
- c. Monthly messages posted on social media.

IV. Senior Centers

- a. Outreach Advisors conduct presentations to the Senior Centers throughout San Diego with information on SDG&E's programs.

1.5.3 Identify the various resources the IOUs utilize to target the disabled community and the enrollments as a result:

SDG&E's ME&O communications are designed to specifically address the communication needs of its customers with disabilities as detailed below.

For customers with visual impairments, SDG&E has provided large-font printed collateral materials and provides program information booklets in Braille. In 2018, SDG&E updated and refreshed the Braille booklet with the most up-to-date energy saving tips and resources.

For customers with hearing impairments, SDG&E worked with its CBO's to produce videos in ASL and closed-captioning to promote SDG&E's ESA Program.

In addition, SDG&E has partnered with several CBO's serving customers with special needs to actively promote the ESA Program. The list of those organizations are in Section 1.5.1 above.

These partners provide customized messaging through email, e-blasts, newsletters, social media posts like Facebook and Twitter, as well as at events, workshops and training with the organization's staff. These efforts led to 8% of SDG&E's ESA Program enrollments identified as disabled customers for 2018.

1.5.4 If participation from the disabled community is below the 15% goal, provide an explanation why:

In 2018, SDG&E's disabled enrollment numbers totaled 8%. As in previous years, the challenges with reaching this goal is in part because of the limitation in how identification of a disabled customer takes place. Customers are not required to provide disability status, and often customers are not comfortable doing so. Contractors are reliant on the customers providing that information, or by using visual indicators, which may not be visually apparent. As done in previous years, SDG&E continued to partner with local organizations serving disabled customers, such as Deaf Community Services, 2-1-1 San Diego, and others to help increase enrollments within its service territory. To help support future efforts, SDG&E began partnering with the National Braille Press to provide translation for the Statewide Energy Education booklet into Braille. Copies will become available to partnering agencies in 2019.

1.6 Leveraging Success, Including LIHEAP

Decision 08-11-031 defines leveraging as “an IOU’s effort to coordinate its ESA Programs with programs outside the IOU that serve low income customers, including programs offered by the public, private, non-profit or for-profit, local, state, and federal government sectors that result in energy

efficiency measure installations in low income households”. Progress will be measured by tracking the following criteria:

- **Dollars saved:** Leveraging efforts are measurable and quantifiable in terms of dollars saved by the IOU (shared/contributed/donated resources, elimination of redundant processes, shared/contributed marketing materials, discounts or reductions in the cost of installation, replacement, and repair of measures, are just some examples of cost savings to the IOU).
- **Energy savings/benefits:** Leveraging efforts are measurable and quantifiable in terms of home energy benefits/savings to the eligible households.
- **Enrollment increases:** Leveraging efforts are measurable and quantifiable in terms of program enrollment increases and/or customers served.

1.6.1 Describe the efforts taken to reach out and coordinate the Energy Savings Assistance Program with other related low-income programs offered outside the IOU that serve low income customers.

SDG&E has established partnerships with over 250 organizations in the community. These partners include Women, Infant and Children (WIC) agencies, Catholic Charities, 2-1-1 San Diego, and many more similar agencies. As part of the intake process, 2-1-1 San Diego enrolls the customer in CARE and FERA and also offers leads to the ESA Program. Over 170 customers were enrolled in the ESA Program from SDG&E partnership efforts in 2018.

SDG&E has also coordinated collaboration efforts between the Solar on Multifamily Affordable Housing (SOMAH) and the ESA Program multifamily (MF) Common Area Measure (CAM) initiative. SDG&E’s single point of contact (SPOC) began facilitating meetings in 2018 to establish a process that will leverage leads across both programs; once the SOMAH Program launches in 2019 SDG&E expects to see great success out of this collaborative process and will begin tracking the enrollments from this leveraging effort.

As directed in D.17-12-009, SDG&E entered into a Non-Disclosure Agreement with the Single-family Affordable Solar Homes (SASH) Program Administrator, currently GRID Alternatives, to provide lists of owner-occupied single-family households that have completed the ESA Program requirements of the CARE Program high usage process. Additional information regarding this effort is provided in Section 1.7.6 below.

1.6.2 In addition to tracking and reporting whether each leveraging effort meets the above criteria in order to measure the level of success, please describe the Other Benefits resulting from this particular partnership not captured under the 3 criteria described above.

SDG&E's robust network of local agency partnerships helped the utility promote programs and services offered quickly and efficiently to customers in need. Partnerships with organizations such as 2-1-1 San Diego also helped streamline the enrollment processes for the programs and increased the ability of customers to receive comprehensive services, from payment assistance to ESA Program measure installation, providing for a simplified customer experience.

1.6.3 Please provide a status of the leveraging effort with CSD. What new steps or programs have been implemented for this program year? What was the result in terms of new enrollments?

SDG&E has been working closely with local LIHEAP agencies to improve leveraging opportunities between CSD's LIHEAP and the ESA Program. The agencies are leveraging LIHEAP payment assistance customers as the leads for ESA Program treatment efforts. In 2018, LIHEAP contractors enrolled over 856 LIHEAP participants in the ESA Program, demonstrating that the current leveraging efforts are working (see ESA Table 14 included in this report). This effort helped reduce cost associated with outreach, and reduced cost of

verification by leveraging the LIHEAP income verification process which occurs at the time the customer receives payment assistance.

Over the course of 2017 and continuing into 2018, SDG&E worked with CSD to finalize Non-Disclosure Agreements to provide customer usage information for customers treated by CSD. In December 2017, SDG&E received the first data request from CSD for usage data. SDG&E compiled the data and submitted it to CSD on January 30, 2018. The data sharing activity frequency will be annually and will be submitted by CSD. In December 2018, SDG&E received a second data request from CSD and SDG&E provided the response to CSD in early January 2019. SDG&E was in discussion with CSD on developing an application-programming interface (API), which would automate the data exchange process between SDG&E and CSD and allow for greater frequency of the data exchange. Given current frequency and volume of data, the current process for providing the data is efficient and cost effective. Automating the process using an API can be discussed further should the frequency, data volume or other factors be identified that would justify the cost to implement an API.

In SDG&E's Advice Letter 3250-E/2688-G, it included plans on coordination efforts with local LIHEAP agencies to support customers with non-IOU fuels with high-energy burdens. As part of the long-standing partnerships with local LIHEAP payment assistance agencies, these organization support customers by offering various payment assistance programs available and maximizing measures offered through the ESA Program and LIHEAP. This

partnership also allows for the installation of measures to renters that may not be available through the ESA Program.

1.6.4 Describe the coordination efforts with water agencies or companies (wholesalers or retailers).

In 2017, SDG&E and San Diego Water County Water Authority (SDWCA) began developing a plan to improve partnership efforts between the two organizations. The partnership between SDG&E and SDWCA is known as the Water Energy Partnership (WEN) and its purpose is to provide increased incentives (water and energy) through a simplified process by using one contractor to install measures for both. Additional benefits include streamlined communications and marketing efforts, increased installation of measures for larger savings, and improving the ability to use available funds to benefit the customer.

In June 2018, the SDCWA and SDG&E entered into an agreement to implement a residential low-income water-energy collaboration. This effort allows SDCWA to augment ESA Program funding for certain measures that save both energy and water, thereby expanding the number of customers served and the amount of energy and water saved. Additionally, SDG&E and SDCWA leverage outreach opportunities to raise awareness of their respective programs. SDCWA promoted the ESA Program as part of their customer education efforts, while SDG&E included SDCWA water saving educational materials as part of the In-Home Education process under the ESA Program. This collaboration will continue through December 31, 2020. SDG&E will work with other water agencies within its service territory to explore other opportunities for leveraging.

In December 2018, SDG&E provided SDCWA with information on water measures installed for ESA Program customers. SDCWA is in the process of reconciling the customer information with their records to identify which customers are within their water district. Once that information has been reconciled, SDCWA will rebate SDG&E for the eligible water measures installed through the ESA Program.

In 2018, SDG&E expanded its work with Moulton Niguel Water District (MNWD) by initiating discussions to expand the WEN initiatives forged with SDCWA into MNWD's service territory. SDG&E's 2018 work included in-person planning meetings, program design, and contracting. Implementation is expected in 2019.

1.7 Integration Success

Per D.08-11-031:

“Integration constitutes an organization's internal efforts among its various departments and programs to identify, develop, and enact cooperative relationships that increase the effectiveness of customer demand side management programs and resources. Integration should result in more economic efficiency and energy savings than would have occurred in the absence of integration efforts.”

1.7.1 Describe the new efforts in program year to integrate and coordinate the Energy Savings Assistance Program with the CARE Program.

The CARE and ESA Programs have had extensive coordination efforts in place over the past several years which are intended to simplify the enrollment process and eliminate duplication of efforts by customers. Efforts include but are not limited to: leveraging income documents information to simplify enrollment for customers, a single online application form for the CARE and ESA Programs, and CARE enrollment on the ESA Program agreement forms. SDG&E's

Customer Outreach team also coordinates outreach opportunities when working with contractors and customers in the community. These efforts continued in 2018.

1.7.2 Describe the new efforts in program year to integrate and coordinate the Energy Savings Assistance Program with the Energy Efficiency Residential Program.

Within the residential energy efficiency portfolio, SDG&E works to minimize confusion that property owners/managers may have regarding various program participation and eligibility requirements through the Single Point of Contact for multifamily properties (MF SPOC.) The MF SPOC approach was authorized in D.16-11-022 to provide a one-stop shop for MF property owners and managers. The SPOC leverages the current list of residential energy efficiency measure offerings available through the Multifamily Energy Efficiency Rebate (MFEER) Program, Comprehensive Mobile Home Program (CMHP), California Advanced Homes Program (CAHP), and Energy Upgrade California Multifamily (EUC MF) Program in addition to all of the common area and tenant focused measures offered through the ESA Program. When the SPOC evaluates multifamily properties, internal analytics are used to help determine the likelihood of ESA Program eligibility for tenants while also working to support enrollment efforts in SDG&E's bill assistance programs, such as CARE, FERA, and the Medical Baseline Programs.

Through this SPOC approach, SDG&E also facilitates multifamily property participation in other internal SDG&E programs, such as the electric vehicle Power Your Drive Program. The SPOC also coordinates collaboration efforts between the SOMAH program administrator and ESA Multifamily

Common Area Measure (ESA MF CAM) initiatives so that leads are leveraged across all programs that are relevant to the customer.

The SPOC coordinates all common area and in-unit enrollments across low income and energy efficiency programs so that they appear to be one comprehensive whole building approach from the participant's perspective. The SPOC approach also allows for better visibility into what is and is not working by identifying areas where refinements in the programs may be needed to improve property owner/manager satisfaction with utility programs. In 2019, SDG&E plans to implement similar collaboration efforts across other programs in order to maximize property owner touchpoints being made by program implementers.

1.7.3 Describe the new efforts in program year to integrate and coordinate the Energy Savings Assistance Program with the Energy Efficiency Government Partnerships Program.

See Section 1.6.4 describing the current partnership with the SDCWA.

1.7.4 Describe the new efforts in program year to integrate and coordinate the Energy Savings Assistance Program with any additional Energy Efficiency Programs.

As described above, SDG&E's MF SPOC coordinates efforts targeted toward multifamily properties for energy efficiency programs. In cases where a multifamily property's common area meter is on a non-residential (commercial rate,) the SPOC is able to leverage non-residential energy efficiency programs to provide a property owner additional energy efficiency options, including Business Energy Solutions (BES) Program, Energy Efficiency Business Rebate (EEBR) Program, Energy Efficiency Business Incentive (EEBI) Program, the Midstream Lighting Program, and the On-Bill Financing (OBF) Program. The process for intake and qualification for the non-residential energy efficiency offerings is the

same as the residential programs, allowing for a seamless and simple customer experience.

1.7.5 Describe the new efforts in program year to integrate and coordinate the Energy Savings Assistance Program with the Demand Response programs, including successes in Air Conditioning Cycling or other Demand Response programs.

On May 3, 2018, the Commission approved SDG&E's Advice Letter 3197-E/2655-G to implement the PCT or Smart Thermostat TOU Pilot directed in D.17-12-009. The objective of the pilot is to explore and evaluate whether a PCT paired with a mobile application impacts the behavior of high usage customers as they transition to TOU. As part of this effort, the SDG&E internal ESA Program and Demand Response (DR) program teams coordinated closely to capture lessons learned from installations of PCTs as part of the DR program. Additionally, DR and EE program data was shared to support targeting efforts and to minimize targeting of customers who have previously received a PCT or a rebate for the installation of a PCT.

1.7.6 Describe the new efforts in program year to integrate and coordinate the Energy Savings Assistance Program with the California Solar Initiative Programs.

As mentioned in Section 1.6.1, SDG&E began collaborating with the SOMAH program administrators to develop opportunities to coordinate enrollment with ESA MF CAM. Additionally, SDG&E continued to work with GRID Alternatives, the SASH Program Administrator, to provide them a list of CARE High Energy User (HEU) customers who had participated in the ESA Program. The referrals contained contact information, including: customer of record, address, phone number, preferred language, household size and income.

Customers are notified that they may be contacted by GRID Alternatives as part of the CARE approval letter received once the customer has completed the HEU verification process. In 2018, SDG&E experienced some delays in getting the monthly list to GRID Alternatives due to a new system implementation. SDG&E communicated the issues to GRID Alternatives and provided information to them retroactively to make sure they received all relevant data.

1.7.7 Provide the number of referrals to the Single Family Affordable Solar Homes Program Administrator.

In 2018, SDG&E provided GRID Alternatives with 201 referrals of ESA Program participants identified as CARE Program high users. SDG&E did not receive any follow-up inquiries from GRID Alternatives on the information provided.

1.8 Workforce Education & Training

1.8.1 Please summarize efforts to improve and expand Energy Savings Assistance Program workforce education and training. Describe steps taken to hire and train low income workers and how such efforts differ from prior program years.

In 2018, SDG&E provided email notifications to ESA Program contractors with relevant workforce, education, and training (WE&T) that may benefit their staff. Contractors can take advantage of classes offered and are encouraged to do so.

Additionally, in September and December 2018, SDG&E notified its ESA Program inspectors and ESA Program contractors of a training opportunity for Natural Gas Appliance Testing (NGAT). Over 20 participants attended the training. The training consisted of two parts, both classroom and field.

Participants took a pre and post-test to assess their knowledge achieved from the

NGAT training. The training was a refresher course for the existing NGAT contractor staff to ensure proper NGAT protocols and best practices are consistently practiced across contractors. The ESA Program contractors were also provided an overview of how properly operating appliances can provide additional energy efficiency benefits. This was the first time this training has been offered directly by SDG&E.

1.8.2 Please list the different types of training conducted and the various recruitment efforts employed to train and hire from the low income energy efficiency workforce.

See above section for training conducted.

SDG&E contractors utilize various business development organizations as part of recruitment and hiring efforts. San Diego Workforce Partnership, San Diego Health and Human Services, San Diego Community College are just some of the organizations that are utilized to find workforce resources for the ESA Program. With the low employment rates, these organizations are helpful in providing needed resources to successfully implement the ESA Program.

1.9 Legislative Lighting Requirements Status

1.9.1 Provide a summary on current and future CFL supply issues, as experienced by the IOU. Any current / future problems as well as potential solutions should be discussed in this paragraph.

Effective January 1, 2018, compact fluorescent lamps (CFLs) were no longer offered through the ESA Program pursuant to D.16-11-022. Therefore, SDG&E did not offer this measure in 2018.

1.9.2 Provide a summary explaining how IOU promotes the recycling/ collection rules for CFLs.

See Section 1.9.1 above. SDG&E did not offer CFLs in 2018 and no recycling provisions were provided.

1.9.3 Complete Table 15 (in Appendix). In addition, please briefly summarize the CFL procurement process for the IOU, including manufacturers, distributors, warehousing, and contractor delivery.

See Section 1.9.1 above. SDG&E did not offer CFLs in 2018.

1.10 Studies

1.10.1 For each Study, provide 1) a summary describing the activities undertaken in the study since its inception; 2) the study progress, problems encountered, ideas on solutions; and 3) the activities anticipated in the next quarter and the next year.

D.16-11-022 authorized three statewide studies: A Low-Income Needs Assessment (LINA), an ESA Impact Evaluation, and a Non- Energy Benefits (NEBs) study. In addition, the Decision authorized funding for a low-income component of the Statewide Energy Efficiency Potential Study, and for local “rapid feedback” research. Each of these is discussed below.

Statewide Low-Income Needs Assessment (LINA) Study

The LINA Study is mandated to be conducted every three years per AB 327 and Public Utilities Code Section 382(d). During 2018 the following activities took place: Research Into Action was selected through a competitive bidding process in January 2018. A research plan was developed during Q1 of 2018 and presented at a public workshop on May 3, 2018. Data collection plans and instruments were developed over the course of Q2-Q4 2018, and Research into Action began collecting data in December 2018. Data collection will

continue in 2019 along with analysis and reporting. The draft report is expected to be completed and presented in a public workshop by Q4 2019. The study is on track to be completed by December 2019.

ESA Energy Savings Impact Evaluation

Following a competitive solicitation, the contract for this study was awarded in February 2016 to DNV GL, pending authorization of the study which was granted in D.16-11-022. SoCalGas is the contracting IOU. Activities during 2018 include the following: Preliminary Phase 1 results were provided in March 2018 and then updated in June 2018. These were used in the Midcycle Advice Letter at the direction of the Energy Division. Additional analysis for Phase 2 took place in the second half of 2018, incorporating another year of ESA measure installation data into the dataset and revising the results. Final Phase 2 results were provided in Q1 2019, and a Draft Report for the study was presented in a public webinar in Q2 2019.

ESA Non-Energy Benefits Study

The scope of work for the ESA NEB Study was developed in consultation with the ESA Cost Effectiveness Working Group in 2017 as directed in D.16-11-022. An RFP for the study was issued in March 2018 and Skumatz Economic Research Associates was chosen as the study contractor. A project initiation meeting was held on August 24, 2018 and a Draft Research Plan was presented during a public webinar on October 12, 2018. Results are expected in early 2019 and will be presented in a public webinar in Q2 2019.

Low Income Component of the Energy Efficiency Potential Study

This study is managed by the Energy Division. No work was completed on this study by the IOUs in 2018.

Rapid Feedback Local Research

No work was initiated with this funding in 2018.

D.16-11-022 and D.17-12-009 Evaluation Requirements

Ordering Paragraph 52 of D.17-12-009 states “Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company and Southern California Gas Company shall apply the latest version of the Energy Division & Program Administrator Energy Efficiency Evaluation, Measurement and Verification Plan for the oversight, formation, description, tracking, review and approval, and initiation of their Evaluation, Measurement and Verification efforts. The utilities should update its impact evaluations to be in accordance with the guidelines established within this decision.”

In accordance with this direction, the IOUs have been working with the Energy Division on the approved statewide studies as described in the sections above. Draft and final research plans for each of the studies were posted on the Commission’s public document website and noticed to the applicable service list. A webinar was held for each study to present the research plan and discuss with interested parties and encourage them to post written comments on the draft documents which were then considered for the final documents. Furthermore, for each ongoing study the IOUs met regularly with Energy Division to discuss progress and to resolve any issues.

Table 1.10.1: D.16-11-022 and D.17-12-009 Approved ESA Studies

Study	Lead Consultant	Contracting IOU	Project Initiation	Project Completion	Statewide Budget ¹	SDG&E Budget
2019 Statewide LINA	Research Into Action	SCE	2/14/2018	12/2019	\$500,000	\$75,000
PY2015 Statewide ESA Impact Evaluation	DNV GL	SoCalGas	1/26/2017	2019	\$550,000	\$82,500
Statewide NEBs Study	SERA	SDG&E	8/24/2018	2019	\$150,000	\$22,500
ESA Portion of the Statewide Energy Efficiency Potential Study ²	Navigant	CPUC, Not IOU	2/2019	12/2019	\$300,000	\$45,000
Rapid Feedback Research & Analysis ³	TBD	SDG&E	TBD	TBD	N/A	\$200,000
Total					\$1,500,000	\$425,000

¹ This amount represents the total Joint Utility study budget, authorized in D.16-11-022. The authorized Joint Utility budget split for all studies is: PG&E--30%, SCE--30%, SCG--25%, and SDG&E--15%.

² Energy Division is the contracting administrator for the Potential study.

³ Rapid Feedback Research & Analysis is not a statewide study. Each IOU has its own budget with which to propose research. During 2018, no rapid feedback studies or analyses were initiated by SDG&E.

1.10.2 If applicable, submit Final Study Report describing: (1) overview of study; (2) budget spent vs. authorized budget; (3) final results of study; and (4) recommendations.

No study reports were finalized in 2018.

1.11 Pilots

1.11.1 For each Pilot, provide 1) a summary describing the activities undertaken in the study since its inception; 2) the study progress, problems encountered, ideas on solutions; 3) the activities anticipated in the next quarter and the next year; and 4) Status of Pilot Evaluation Plan (PEP).

On May 3, 2018, SDG&E received approval of Advice Letter 3197-E/2655-G for the PCT or Smart Thermostat TOU Pilot, ordered in D.17-12-009.

The goal of the pilot is to explore and evaluate whether a PCT paired with a mobile application impacts the behavior of high usage customers as they

transition to TOU. The Pilot will have a Treatment Group, which will receive a Smart Thermostat and transition to TOU, and a control group, which will transition to TOU but will not receive the Smart Thermostat. All customers will receive three surveys and will be compensated for their participation in the Pilot.

In 2018, SDG&E completed recruitment efforts, which included email campaigns and direct mail to CARE and FERA customers with higher energy use. Customers responding to the campaigns received a follow-up call to confirm their interest and to enroll them in the Pilot. Recruitment efforts did not yield the results SDG&E anticipated. Recruitment efforts for the Pilot were challenged by the short implementation timeline and by SDG&E's rollout of TOU rates to the residential market pursuant to D.15-07-001.¹⁶ SDG&E began pulling customers for the rollout in December 2018, therefore the target list of customers for the pilot needed to be completed prior to that date. As of the end of 2018, SDG&E's final recruitment efforts resulted in 168 potential participants rather than the 600-1000 participants originally anticipated. Similar recruitment challenges were experienced by the other IOUs. As a result of the limited participation, the pilot may not be able to provide statistically significant results on differences in consumption or energy shifting; however, the qualitative findings are still expected to be informative and valuable for program planning.

In October 2018, PG&E hired Evergreen Economics to perform a statewide evaluation of the pilot on behalf of the IOUs. Evergreen Economics is also responsible for randomly assigning the pilot participants into treatment and

¹⁶ D.15-07-001, Decision on Residential Rate Reform for IOUs in transition to TOU rates.

control groups and for conducting three customer surveys during 2018. A final report will be provided at the end of the evaluation in Q1 2020.

1.11.2 If applicable, submit Final Pilot Report describing: 1) Overview of pilot; 2) Description of Pilot Evaluation Plan (PEP); 3) Budget spent vs. authorized budget; 4) Final results of pilot (including effectiveness of the program, increased customer enrollments or enhanced program energy savings); and 5) Recommendations.

The pilot is ongoing.

1.12 “Add Back” Measures

For measures that fall below the cost effectiveness threshold under Decision 08-11-031, we require additional reporting to show the cost, energy savings impacts, and related metrics.

1.12.1 If the "add-backs" compromise the IOUs' ability to meet the 2020 Plan goal that 100% of eligible and willing customers will have received all cost effective Energy Savings Assistance Program measures, how does the IOU propose to address the shortfall in other parts of the Energy Savings Assistance Program?

In 2018, SDG&E did not experience a shortfall in the homes treated goal of 21,332 as directed by D.17-12-009. Add back measures have not negatively impacted the ESA Program and SDG&E anticipates meeting its 2020 homes treated goal by 2019.

1.13 Low Income Working Groups

D.16-11-022, as modified by D.17-12-009, reconvened the Cost Effectiveness and Mid-Cycle Working Groups and convened a new Multifamily Working Group (MFWG) to review those components of the Commission’s ESA and CARE Programs to make recommendations for refinements to improve, wherever possible, the design, administration, delivery, reporting, and ultimate success of these programs. D.17-12-009 also directed the inclusion of low income programs into the existing Demand Analysis Working Group (DAWG). In 2018, SDG&E actively participated in all of the low

income working groups (with the exception of DAWG) on efforts directed in D.16-11-022 and D.17-12-009 such as revising the CARE and ESA reporting requirements templates, revising the statewide ESA Program Policy and Procedures Manual, revising the statewide ESA Program Installation Manual, establishing a household retreatment prioritization model for the ESA Program, finalizing cost-effectiveness recommendations, and ESA MF CAM program design. The Working Groups 2018 activities are summarized below.

ESA Cost Effectiveness Working Group

D.16-11-022, as modified by D.17-12-009, instructed the ESA Cost Effectiveness Working Group to reconvene and to provide a set of recommendations related to the ESA cost effectiveness calculations. The members participating in the Working Group include representatives from the following organizations: Energy Division, ORA, National Resources Defense Council, The Utility Reform Network, TELACU/ACCES/Maravilla, Synergy Companies, SCE, PG&E, SoCalGas, and SDG&E. The direction to the Working Group from D.16-11-022, as modified by D.17-12-009, included the following:

1. Submit a proposed schedule and work plan to the low-income proceeding service list no later than 60 days after the date of Decision approval.
2. Provide recommendations on a set of issues related to ESA cost effectiveness calculations to be used to inform the next program cycle; these recommendations or a progress report are to be distributed to the service list no later than the second quarter of 2018.

Item number one was submitted to the service list on January 11, 2017. The Working Group met monthly through 2017 both by teleconference and in-person to discuss the issues in

Item number two. The issues discussed by the Working Group included the following:

- Measures to include/exclude in the adjusted ESA Cost Effectiveness Test (ESACET);
- Excluding administrative costs and Non Energy Benefits (NEBs) associated with excluded measures from the adjusted ESACET including program costs not tied to a specific measure;
- Allocating administrative costs and NEBs across program measures;
- Incorporating revised NEB values into the adjusted ESACET;
- Whether to incorporate into the ESACET benefits and costs for ESA investment in other programs such as demand response; and
- Work scope for the 2018 NEB study.

The Working Group began drafting a set of written recommendations in the fourth quarter of 2017. The recommendations were finalized and submitted to the service list in 2018.

Multifamily Working Group

The MFWG was established to support the integration of common area measures for deed restricted MF properties into the ESA Program and other MF directives as specified in D.16-11-022, as modified by D.17-12-009. In 2018, the MFWG completed the 2018 Annual Report describing the working group 2018 activities. (Posted to www.energydataweb.com.)

SDG&E actively participated in the MFWG in 2018. The group highlights include:

- Discussed ESA MF CAM Initiative Advice Letter filing and program design options;
- Discussed possible CARE expansion;
- Discussed analysis for resyndication projects, coordinate/prepare for MF CAM progress report; and
- Discussed statement of work for MF non-deed restricted analysis and the need to collect program feedback data.

See Appendix B for MFWG Annual Report of 2018 activities.

Mid-Cycle Working Group

D.16-11-022, as modified by D.17-12-009, instructed the Mid-Cycle Working Group to reconvene and address the tasks outlined below. The members participating in the Working Group include representatives from the following organizations: Energy Division, ORA, SCE, PG&E, SoCalGas, SDG&E, Energy Efficiency Council, TELACU, and Proteus.

MCWG deliverables identified in D.16-11-022, as modified by D.17-12-009, were:

- Making recommendations for updates to the Energy Savings Assistance (ESA) Statewide Policy and Procedure Manual, California Installation Standards Manual, and monthly and annual reporting criteria to align it with D.16-11-022, as modified by D.17-12-009.
- Provide recommendations on the adoption of online data reporting systems (ODRS) for the ESA Program to help the IOUs and Commission better understand how these systems collect and report workforce data. This assessment should help determine the value of adopting ODRS for the ESA Program into IOU operations, its cost- benefits-, and identify any administrative burdens to implement by either contractor or utility.
- Making recommendations for the household retreatment prioritization models, implementation and outreach strategies, and other aspects of the ESA Program.
- Investigate and make recommendations on how the ESA Program may be used to deploy tools to enable greater Energy Efficiency and Demand Response participation by CARE and ESA participants in recognition of the increased State goals detailed in SB 350.

The MCWG held meetings in 2018 to address these tasks and were incorporated into the programs in 2018.

The MCWG discussed monthly and annual reporting criteria, reviewed and commented on the reporting templates developed by Energy Division and incorporated into the templates for use beginning in 2018.

The working group completed revisions to the ESA Statewide Policy and Procedure Manual and the California Installation Standards Manual to align them with D.16-11-022, as

modified by D.17-12-009. The Manuals were submitted to the service list in A.14-11-007 et. al, and presented through a public webinar on January 31, 2018.

IOUs provided their household retreatment prioritization models to the MCWG in March 2017. These were reviewed and discussed by the MCWG for their initial recommendations, submitted on April 3, 2017.

The MCWG submitted its final recommendations in the 2nd Quarter of 2018, in time to be considered in the IOUs' Mid Cycle Update Advice Letters, which were provided to the low income service list in July 2018 pursuant to D.17-12-009 and approved by the Commission's Energy Division on December 27, 2018. See Appendix C for MCWG recommendations served in July 2018.

Demand Analysis Working Group

D.17-12-009 OP 8 states: "The Demand Analysis Working Group (DAWG) should act as the established forum for providing input into the scope, modeling and analysis of results associated with Energy Efficiency Potential Study."

There was no low-income activity with this Working Group in 2018. The Energy Efficiency Potential Study, which is administered by Commission staff, was not initiated until 2019.

1.14 Annual Public ESA Program and CARE Meeting

D.17-12-009 adopted the provisions set forth in D.12-08-044 which ordered the IOUs to convene a minimum of one public meeting per year, within 60 days of the filing of their annual report, and other public meetings as deemed necessary by the IOUs, Energy Division, the ALJ, or the Commission.

In compliance with D.17-12-009, the IOUs held a joint public meeting via webinar on June 26, 2018 to present an overview of their respective 2017 ESA Program

and CARE Program results. Specifically, SDG&E's presentation showed it exceeded its ESA Program homes treated goal which was accomplished through its outreach and marketing efforts of the program. Also, SDG&E's presentation showed an increase in its CARE penetration rate which moved closer to achieving the goal.

In addition to comply with D.17-12-009, the IOUs and CSD co-hosted the June 26, 2018 public meeting to discuss their leveraging efforts in 2017.

1.15 Multifamily Properties

1.15.1 The IOUs shall conduct and report an annual analysis of the square footage, energy consumption, ESA Program participation, and time since the last retrofit of non-deed restricted multifamily properties with a high percentage of low income tenants.

SDG&E followed the steps listed below for the first year of the Non-Deed Restricted Multi-family Property Low Income annual analysis. This is SDG&E's first analysis, and in the subsequent years of this annual analysis, SDG&E will seek to improve the data sources and refine the analysis approach.

SDG&E used third party data that was compiled and provided by the American Council for an Energy-Efficient Economy's (ACEEE) Technical Assistance Group. The data consisted of lists of subsidized and non-subsidized multi-family properties in the San Diego area using data from the National Housing Preservation Database, San Diego County parcel dataset, and San Diego County land use codes. The data included square footage, although it was not complete for every record in the database.

SDG&E identified the non-deed restricted properties in the dataset with a high percentage of low income tenants and attempted to match them with customer premise and account numbers in order to access utility consumption data for the properties. Multiple challenges were encountered with this project. In particular, property addresses on the various lists did not

directly match, duplicate records had to be eliminated, multiple records existed for single properties that needed to be aggregated, and incorrect street numbers had to be manually corrected. In addition, the square footage data included in the ACEEE dataset was incomplete. For some records, the square footage data was missing and for some records it was capped at 99,999. Due to the many challenges involved in identifying an appropriate subset of properties to analyze, SDG&E focused on using records with exact matches for this first year of analysis. Results are provided in the following tables. As shown, SDG&E was able to identify 1,780 properties with a total consumption of 113,226 MWh and 5,303,000 therms in 2018. Furthermore, 78% of these properties received treatment through the ESA Program and 6% received treatment through the MFEER Program.

SDG&E Multi-Family Non-Deed Restricted Property Analysis - Electric Consumption

Category	Number of Properties	Average Sq. Ft.	Total 2018 Annual MWh	Total 2018 Annual MWh for Common Areas	Total 2018 Annual MWh for Units	Total 2018 Annual MWh for Master Meters
Has Sq. Ft. Data	1,580	12,000	86,750	10,500	76,200	50
Sq. Ft. Capped at 99,999	20	N/A	11,400	1,300	10,100	N/A
Sq. Ft Data Missing	180	N/A	15,076	2,110	12,950	16

SDG&E Multi-Family Non-Deed Restricted Property Analysis - Gas Consumption

Category	Number of Properties	Average Sq. Ft.	Total 2018 Annual Therms	Total 2018 Annual Therms for Common Areas	Total 2018 Annual Therms for Units	Total 2018 Annual Therms for Master Meters
Has Sq. Ft. Data	1,580	12,000	4,090,000	260,000	1,000,000	2,830,000
Sq. Ft. Capped at 99,999	20	N/A	462,000	48,000	89,000	325,000
Sq. Ft Data Missing	180	N/A	751,000	86,000	148,000	517,000

Program Participation

Year Last Treated	# Properties Treated through ESA	# Properties Treated through MFEER	# Properties Treated through MIDI
2010	21	5	0
2011	29	9	0
2012	52	15	0
2013	69	15	0
2014	122	6	2
2015	109	11	0
2016	98	4	0
2017	146	29	2
2018	741	20	0

The Program Participation Table above reflects the last installation date at the property.

Therefore, properties treated over multiple years are counted only in the last year they were treated. Furthermore, 91 of these properties were last treated by both ESA and MFEER between 2010-2018.

1.15.2 The IOUs shall describe the activities conducted in multifamily properties for multifamily common area measures under the ESA Program.

On May 30, 2018, SDG&E received approval for its ESA Program MF CAM Initiative Implementation Plan. SDG&E began conducting outreach efforts utilizing SDG&E's multifamily SPOC and working to contract with a third party for the implementation of the program. In September 2018, SDG&E finalized a contract with a vendor to implement the ESA MF CAM initiative. SDG&E worked with this vendor to establish processes and procedures on how to conduct outreach, enroll customers, and install measures. Additionally, to make sure that all available programs are offered to a multifamily property, processes were established for the streamlined hand off of properties that may fall out of ESA MF CAM due to eligibility to SDG&E's SPOC for further program evaluation and

analysis for fit in other multifamily energy efficiency programs. Furthermore, SDG&E began planning, requesting, and prioritizing enhancements to its online database platform that would facilitate tracking and invoicing all ESA MF CAM projects.

In December 2018, the vendor initiated targeted marketing to potential ESA MF CAM properties, including re-syndication projects in SDG&E's service territory. These efforts yielded the assessment of one property in the northern region of San Diego County. In addition, the vendor identified other potential properties and are scheduled for assessments in 2019.

To further assist the ESA MF CAM initiative, SDG&E established its MF CAM website that went live on December 11, 2018. On the website page, SDG&E provides a description of the program, eligibility requirements, program flow, and how to get in contact with SDG&E's implementor.

CALIFORNIA ALTERNATE RATES FOR ENERGY ANNUAL REPORT

2 CARE EXECUTIVE SUMMARY

The CARE Program, formerly known as the Low-Income Ratepayer Assistance (LIRA) Program, was established through legislative mandate¹⁷ and was implemented by the Commission in D. 89-07-062 and D.89-09-044. The Commission expanded the program to qualified non-profit group living facilities such as women's shelters and homeless shelters in

¹⁷ Senate Bill (SB) 987 (enacted in June 1988) directed the Commission to establish a program of assistance to low income customers to mitigate the impact caused by the narrowing of the baseline/non-baseline differential and that the cost of the assistance program was not to be borne solely by any single class of customer.

1992 in response to additional legislation.¹⁸ In D. 95-10-047, CARE was further expanded to qualified agricultural housing facilities; and, D.05-04-052 more broadly expanded the program to include agricultural housing and non-profit migrant farm working housing centers.

Since 2005, income eligibility for CARE has been set at 200 percent of the Federal Poverty Guidelines (FPG).¹⁹ In 2006, the Commission authorized the IOUs to implement: (1) categorical eligibility to allow customers to qualify for the CARE Program based on participation in certain state or federal assistance programs; (2) four-year recertification income-qualified customers with fixed incomes; (3) a telephonic process to enroll certain prospective CARE qualified household; (4) a process for all customers to recertify CARE eligibility through SDG&E's Interactive Voice Recognition (IVR) system; and (5) internet-based CARE enrollment and recertification.

The Commission further expanded the list of categorically eligible programs in D. 08-11-031 to align with the program-based eligibility programs adopted for the Commission's California Lifeline Program and established an enrollment target for CARE at 90% of the estimated eligible population.

In 2010, the legislature enacted SB 695 which modified Section 731.9 of the California Public Utilities Code to state that eligibility for the CARE Program should be no greater than 200% of FPG.

In D.12-08-044, the Commission approved SDG&E's CARE Program plans and budget for 2012-2014. In D.12-08-044, the Commission focused on developing controls to ensure that

¹⁸ SB 693 extended CARE benefits to qualifying group living facilities. SB 491 changed the program's name and modified CARE to include women's shelters, hospices, and homeless shelters. Assembly Bill (AB) 3429 expanded the CARE Program to include migrant farmworker housing, employee housing, and agricultural employee housing.

¹⁹ D. 05-10-044.

customers enrolling in the CARE Program are truly eligible for the benefits. D.12.-08-044 also directed the IOUs to provide an increased focus on enrolling the hard-to-reach customers, such as Limited English Proficient (LEP), hearing impaired, and visually impaired customers. Key directives in D.12-08-044 included: (1) establishment of a High Usage Verification process for customers with electric usage exceeding 400% of their baseline allowance; (2) updates to the utilities' probability models to include more indicators, i.e. method of enrollment and household size; (3) a process to review the list of categorical programs annually to ensure only programs aligned with the CRE guidelines are included;²⁰ and (4) approval of outreach and marketing funds focused on targeted multicultural/multilingual and LEP customers. The Commission also retained the target of reaching a 90% penetration rate and the enrollment of all eligible and willing customers into the CARE Program.

In January 2014, the California Legislature enacted Assembly Bill (AB) 327, which had several impacts to the CARE Program. Most notably, the bill required the IOUs to restructure the CARE rates and to set an effective electric rate discount between 30-35%. The Commission instituted Rulemaking (R.) 12-06-013 to address CARE Rate Reform requirements from AB 327. As part of the Rulemaking, SDG&E proposed to simplify its CARE rate structure by removing the discount from volumetric rates (with the exclusion of the exemption from Department of Water Resources Bond Charge (DWR-BC), California Solar Initiative (CSI) and CARE charges) and to instead provide it as a line-item discount off a bill calculated at standard rates, beginning in 2015. SDG&E also proposed a glide path for restructuring CARE rates to set an effective CARE discount to meet the statutory requirements of AB 327 by 2020. SDG&E's proposed

²⁰ In D.12-08-044, Ordering Paragraph (OP) 46, the Commission suspended the annual advice letter requirement while it resolved outstanding issues related to categorical eligibility.

CARE revisions were approved in D.15-07-001. D.15-07-001 directed SDG&E to file a Tier 1 Advice Letter for approval of the 2015 rate change.

Beginning September 1, 2015, the rate subsidy in CARE volumetric electric tier rates was moved from rates to the line-item discount, increasing the line-item discount from its current 20 percent levels, resulting in CARE rates being equal to the non-CARE rates excluding adjustments for CSI and DWR-BC, prior to the line-item discount and CARE surcharge exemption. This resulted in low-use CARE customers receiving a more equivalent discount when compared to high-use CARE customers. These CARE rate subsidies are reflected in the Total Rate Adjustment Component (TRAC) and recovered through Public Purpose Program (PPP) rates.

With the move of the CARE rate subsidies from rates to a line-item discount, going forward the higher CARE line-item discount is now recovered directly through PPP rates. In 2016, SDG&E participated in the CARE Restructuring Working Group for R.12-06-013. The CARE Restructuring Working Group was tasked to look closely at the CARE rate and program to determine if changes are necessary. Discussion on CARE rate restructuring continued in 2017 as part of Phase 3 of the July 2015 Rate Reform Decision.

In D.14-08-030, the Commission addressed Phase 2 issues outlined in D.12-08-044. It authorized a 12-month bridge funding for 2015; made minor corrections and clarifications to D.12-08-044; adopted key recommendations from the 2013 LINA study for CARE; and continued further review on issues regarding the definition of income and issues related to the qualifying list of categorical eligibility programs.

In addition, in D.14-08-030, the Commission determined that it was reasonable to continue to fund the Community Help and Awareness of Natural Gas and Electricity Services

(CHANGES) Pilot Program, from the CARE budget, pending further review during the bridge period, as well as authorizing continued funding for the CHANGES Program of \$61,200 a month until December 31, 2015, which reflected a 2% cost of living increase over the authorized 2014 funding level.²¹

In D.15-12-047 (Interim Decision on the Community Help and Awareness of Natural Gas and Electricity Service Pilot Program, the Ongoing Program, and Related Funding) the Commission made the following determinations regarding the continuation of the CHANGES Program for the large IOUs which included the following:

Approved the CHANGES Program as an ongoing statewide program, effective January 1, 2016;

- The program will provide outreach, education, and bill issue assistance on natural gas and electricity bills and services to limited English proficient customers through a statewide network of CBOs;
- The program will be managed by the Commission's Public Advisor's Office with technical assistance and input from the Energy Division;
- Until a long-term funding source can be established through the budgetary and/or legislative channels, the ongoing CHANGES Program as a reimbursement from the CARE Program, through the end of the current 2015-2017 program cycle, and may be renewed by the Commission, as needed, into the next CARE Program cycle; and
- In the future, the funding for CHANGES will ideally come from the Commission's reimbursable budget because it will provide greater latitude to address a range of energy assistance needs experienced by California's low-income population, the LEP population, and population with disabilities.

On November 21, 2016, the Commission issued D.16-11-022, as modified by D.17-12-009, for implementation and funding of the CARE and CHANGES Programs.

²¹ D.14-08-030, OP 48.

This report provides the accomplishments and expenditures for SDG&E’s CARE Program Year (PY) 2018. At year-end 2018, there were 297,103 customers participating in the CARE Program for an overall penetration rate of 92%.

2.1 Participant Information

2.1.1 Provide the total number of residential CARE customers, including submetered tenants, by month, by energy source, for the reporting period and explain any variances of 5% or more in the number of participants.

Residential CARE Program Electric Customers by Month			Residential CARE Program Gas Customers by Month		
PY 2018	CARE Customers	Percentage Change	PY 2018	CARE Customers	Percentage Change
Jan	298,295	0.6%	Jan	177,640	-0.2%
Feb	298,176	0.0%	Feb	177,521	-0.1%
Mar	299,228	0.4%	Mar	178,091	0.3%
Apr	298,187	-0.3%	Apr	177,555	-0.3%
May	299,408	0.4%	May	178,274	0.4%
Jun	299,213	-0.1%	Jun	178,056	-0.1%
Jul	298,139	-0.4%	Jul	177,451	-0.3%
Aug	301,084	1.0%	Aug	179,261	1.0%
Sep	300,852	-0.1%	Sep	179,183	0.0%
Oct	298,426	-0.8%	Oct	177,750	-0.8%
Nov	294,254	-1.4%	Nov	174,709	-1.7%
Dec	297,103	1.0%	Dec	176,820	1.2%

2.1.2 Describe the methodology, sources of data, and key computations used to estimate the utility’s CARE penetration rates by energy source.

SDG&E and the other California IOUs used the joint utility methodology adopted by the CPUC in D.01-03-028 for developing monthly penetration estimates in 2018. This method entails annual estimation of eligibility for CARE, ESA, and other income-by-household size parameters at the small area (block

group, census tract, ZIP+2, etc.) for each IOU territory and for the state as a whole.

The requirements for 2018 eligibility, corresponding to the current estimation, again used the January Health and Human Services (HHS) Poverty Guidelines [Federal Register / Vol. 83, No. 12 /Thursday, January 18, 2018 /Notices; p.2643], “bundling” one- and two-person households at the HHS-defined 200% FPG limit as required by AB 327.

Sources for the estimation include the current HHS guidelines, current year small area vendor marginal distributions on household characteristics, Census 2010 SF3 data, Census American Community Survey 2012-2016 Public Use Microdata Sample (PUMS) data, utility meter and master meter household counts, Department of Finance Consumer Price Index series, and various Geographic Information System sources. An important change has been implemented since 2011, which involves adjusting small area (block group) income distributions to match the latest American Community Survey distributions at the Public Use Microdata Area.

Estimates from the block group level are aggregated to county/utility and whole utility level, among other aggregations. Annually, SDG&E applies county/utility level eligibility fractions to a new set of “technical eligibility counts” (for CARE these are metered and sub-metered occupied housing units) obtaining an estimate of income/demographic eligibility in household count form.

SDG&E counts the number of households (by small area, by county, and overall) that are enrolled in CARE on a monthly basis. The CARE household

total, including individually metered and sub-metered occupied housing units, is divided by the total income/demographic eligibility.

In 2009, the method was augmented to better incorporate the impact of labor force changes (unemployment and other forms of job separation, as well as positive changes that are expected to occur in California subsequent to the recession). The method adjusted block group marginal distributions on household income based on sub-state modeling that incorporated Current Population Survey, Integrated Public Use Microdata Survey data, American Community Survey Data, and California Employment Development Department county and Metropolitan Statistical Area level labor force series. This adjustment to block group income marginal is then incorporated into the otherwise “standard” estimation approach to produce small area estimates reflecting small area income changes due to labor market forces.

In 2012, Athens developed an improved method for estimation of payer status-specific eligibility. This method took into consideration American Community Survey microdata relationships between guideline status (above/below 200 percent FPG), tenure, and fuel payment relationships. These cross-classifications are fitted to small area (block group) marginal to produce payer-type specific distributions, which can be aggregated to various other geographical levels.

2.1.2.1 Describe how the estimates of current demographic CARE-eligibility rates, by energy source for the pre-June 1st periods, were derived.

The joint utility methodology, as described above, was used throughout 2018.

2.1.2.2 Describe how the estimates of current CARE-eligible meters were derived. Explain how total residential meters were adjusted to reflect CARE-eligible meters (i.e., master meters that are not sub-metered or other residential meter configurations that do not provide residential service.)

CARE eligibility rates by small and large areas are developed so that they apply to individual residential meters and sub-metered dwelling units only. Non-sub-metered master meters and other meters that do not provide residential service are not included in the “technical eligibility” meter counts.

2.1.2.3 Discuss how the estimates of current CARE-eligible households were developed.

See SDG&E’s response above to Section 2.1.2. Note that the methodology is based on estimating small area (block group) level household size by income and householder-age tabulations for the current year and connecting these estimates with small area counts of households that are individually metered or sub metered. Block group/utility-specific estimates are then disaggregated/aggregated to various geographic levels within a given utility area: zip+2, zip, tract, county, territory, etc. Statewide estimates, regardless of utility boundaries, are also provided at small and large area levels.

2.1.2.4 Describe how current CARE customers were counted.

SDG&E runs a report of active valid CARE participant statuses for each month, in the Customer Assistance Reporting and Enrollment (CARE) system, which is the system of record for CARE applications. This includes both individually metered and sub-metered CARE participants.

2.1.2.5 Discuss how the elements above were used to derive the utility’s CARE participation rates by energy source.

The participation rate by energy source is the total number of participating CARE customers by energy source divided by the estimated eligible CARE population by energy source. Since SDG&E provides electricity to all customers, but only provides natural gas to customers in San Diego County, and does not provide gas in southern Orange County, the number of participation rates, referred to as penetration rates in the annual and monthly report tables, are derived from electric service only.

2.1.3 Provide the estimates of current demographic CARE-eligibility rates by energy source at year-end.

Electric	26.1%
Gas	25.5%

2.1.4 Provide the estimates of current CARE-eligible sub-metered tenants of master-meter customers by energy source at year-end.

Electric	17,840
Gas	13,913

At year-end 2018, there were 37,265 residential electric sub-metered accounts and 29,292 residential gas sub-metered accounts in SDG&E’s service territory. Utilizing the methodology described in Section 2.1.2.3 – 2.1.2.5 above, it is estimated that 47.8% (or 17,840) of the electric residential sub-metered tenants and 47.5% (or 13,913) of the residential gas sub-metered tenants are eligible for the CARE Program.

2.1.5 Provide the current CARE sub-metered tenant counts by energy source at year-end.

Electric	13,078
Gas	11,277

2.1.6 Provide the current CARE sub-metered penetration rates by energy source at year-end.

Electric	73%
Gas	81%

2.1.7 Discuss any problems encountered during the reporting period administering the CARE Program for sub-metered tenants and/or master-meter customers.

There were no problems encountered during the reporting period for sub-metered tenants and master-meter customers.

2.2 CARE Program Summary

2.2.1 Please provide CARE Program summary costs.

CARE Budget Categories	Authorized Budget	Actual Expenses	% of Budget Spent
Outreach	\$3,327,551	\$2,727,574	82%
Proc., Certification and Verification	\$606,657	\$606,657	100%
Post Enrollment Verification	\$356,501	\$254,167	71%
Information Tech./Programming	\$1,661,365	\$1,398,802	84%
Pilots	\$262,500	\$215,805	82%
Measurement and Evaluation	0	0	0
Regulatory Compliance	\$247,184	\$192,044	78%
General Administration	\$720,132	\$381,629	53%
CPUC Energy Division Staff	\$56,712	\$34,395	61%
Cooling Centers	\$43,069	\$40,943	95%
Total Expenses	\$7,281,672	\$5,852,015	80%
Subsidies and Benefits	\$73,102,151	\$126,165,599*	173%
Total Program Costs and Discounts	\$80,383,823	\$132,017,614	164%

*Due to the prior year's underestimation of CARE's projected subsidy requirement, SDG&E has revised how the CARE subsidy is estimated. SDG&E anticipates that the 2019 subsidy spend will be closer to the projected budget.

2.2.2 Please provide the CARE Program penetration rate to date.

CARE Penetration			
Participants Enrolled	Eligible Participants	Penetration rate	Target Met?
297,103	321,323	92%	Yes

2.2.3 Report the number of customer complaints received (formal or informal, however and wherever received) about their CARE recertification efforts, and the nature of the complaints.

There was a total of ten CARE recertification customer complaints reported during 2018. In 2018, SDG&E did not have a process in place to track the recertification complaints from the Customer Contact Center (CCC). However, SDG&E will be able to report complaints received by the CCC in 2019.

Seven customers were removed from the CARE Program due to non-response. These customers completed the recertification process and were placed back on the CARE Program. Six customers did not warrant a rebill. One customer was granted a rebill as a courtesy.

One customer stated they were recertified over the phone by a third-party vendor. However, the recertification was not received by SDG&E. The customer's recertification was completed and a rebill for the period in which the CARE discount was not received was granted.

In May of 2018, SDG&E discovered an issue with the automated notification process. While the system issue was resolved once identified, two customers stated that they did not receive recertification notices and were unaware of the recertification request. Both customers completed the

recertification process and were placed back on the CARE Program and rebilled for the lapse in the program discount.

All ten customer complaints were addressed to the customers' satisfaction.

2.3 CARE Program Costs

2.3.1 Discount Cost

2.3.1.1 State the average monthly CARE discount received, in dollars, per CARE customer by energy source.

Average Monthly Electric Discount	\$32.43
Average Monthly Gas Discount	\$4.69

2.3.1.2 State the annual subsidy (discount) for all CARE customers by energy source.

Electric Subsidy	\$116,158,861
Gas Subsidy	\$10,006,737

2.3.1.3 Provide the Number and Percent of Green Tariff Shared Renewables (GTSR) and Enhanced Community Renewables customer base. Also provide the average total bill discount.

In 2018, there were a total of 300 customers on the Green Tariff component of GTSR. The average total effective CARE discount was 38%. SDG&E did not provide the percentage based on the "distribution" portion of the bill because the discount is not based on the distribution portion.

2.3.2 Administrative Cost

2.3.2.1 Show the CARE Residential Program's administrative cost by category.

Category	Total
Outreach	\$2,727,574
Processing, Certification, Recertification	\$606,657
Post Enrollment Verification	\$254,167
IT Programming	\$1,398,802

Cool Centers	\$40,943
Pilots	\$215,805
Measurement & Evaluation	\$0
Regulatory Compliance ²	\$192,044
General Administration	\$381,629
CPUC Energy Division	\$34,395
Total Program Costs	\$5,852,015

2.3.2.2 Explain what is included in each administrative cost category.

Outreach:

Costs include those related to printing and mailing CARE applications and documents, as well as costs related to postage, bill inserts, brochures and flyers, advertising, targeted direct mail and telephone campaigns, outreach staff labor, CBOs and door-to-door enrollment efforts, and other outreach support efforts.

Processing, Certification and Recertification:

Costs in this category include processing and CCC group labor and data entry costs. The function of the CARE processing group includes:

1. Scanning and indexing CARE applications;
2. Processing/data entering all CARE applications;
3. Initiating and responding to customers' inquiries regarding CARE applications/program;
4. Fielding telephone calls related to CARE Program participation; and
5. Resolving billing issues related to CARE Program enrollment.

Post Enrollment Verification (PEV):

Costs in this category include CARE processing group labor and data entry costs. The function of the PEV group includes:

1. Processing CARE income verification and CARE High Usage Verification;
2. Responding to customers' inquiries regarding CARE income verification documents; and
3. Resolving customer issues related to income verification.

Information Technology (IT) /Programming:

Costs include all IT system support costs to maintain the CARE system, CARE documents, CARE database, IVR, system reports, data exchange with the IOUs, and costs associated with system enhancements to comply with Commission mandates and improving operational efficiencies.

Pilots:

Costs include those associated with the contractor's administration of the CHANGES Program.

Cool Centers/Cool Zones:

Costs include those associated with the development and printing of Cool Zone collateral pieces including translation, labor for the staff at Aging and Independence Services, minor equipment for phone head-sets, fans, logo printing for hand fans, and shipping fees for fans delivered to customers who are unable to get to a cool zone.

Measurement and Evaluation:

Costs include contract and staff labor expenses for CARE participant eligibility updates and analysis.

Regulatory Compliance:

Costs include labor and non-labor costs related to the preparation of various regulatory filings, including program applications, advice letter filings, audits, regulatory reports, comments, tariff revisions, attendance at working groups and joint utility meetings, public input meetings, and other Commission hearings or meetings. In addition, costs include program funding directed by the Commission to be included in this category.

General Administration:

Costs include office supplies, market research and program management labor and expenses.

Commission Energy Division Staff Funding:

This category of expenses reflects costs incurred by the Commission’s Energy Division staff in support of the Commission’s authorized low-income program.

2.3.3 Provide the year-end December 31 balance for the CARE balancing account.

Electric CARE	\$46,510,724 Under-collected
Gas CARE	\$3,726,520 Over-collected

2.3.4 Describe which cost categories are recorded to the CARE balancing account and which are included in base rates.

The general costs categories recorded to the CARE gas and electric balancing accounts include the CARE discount and the program specific administrative expenses as described above in Section 2.3.2.2. There are no costs related to the discount charged in base rates.

2.3.5 Provide a table showing, by customer class, the CARE surcharge paid, the average bill paid, the percentage of CARE surcharge paid relative to the average bill, the total CARE surcharge collected, and the percentage of total CARE revenues paid.

Please see CARE Table 10.

2.4 Outreach

2.4.1 Discuss utility outreach activities and those undertaken by third parties on the utility's behalf including Lifeline coordination.

In 2018, SDG&E continued the creative campaign started in 2017 that focused on letting qualified customers know they can save on their energy bill. The campaign intended to connect with customers by giving them one less thing to worry about. The campaign ran in English, Spanish and Asian languages, and included streaming TV, print, digital (including paid search), email, direct mail and bill inserts.

Mass Media

Mass media allowed SDG&E to educate and connect with its customers through diversified communication mediums designed to reach a mass audience and hard-to-reach populations including customers in rural areas, seniors, customers with special needs and multilingual/multicultural customers. It served to drive overall awareness and complement other Outreach tactics. In 2018, mass media components included print, streaming TV, digital media, bill inserts, ethnic marketing, email, and direct mail.

Print Campaigns

SDG&E continued to run print advertising in Ethnic (African-American, Asian, Hispanic) and rural publications. Samples of print creative are included in the Appendix D.

Streaming TV

In 2018, SDG&E ran a TV commercial campaign through streaming TV media. The 15-second spots ran on streaming (on-demand) TV with placement on Hulu (NBC), Fox.com, ABC.com, CW.com and many others. Streaming TV is very flexible, allowing us to target our customer segments more deeply and optimize performance throughout the campaign. Additionally, through streaming TV, viewers cannot fast forward through the commercials. SDG&E ran three English and two Spanish versions of its TV commercial campaign throughout most of the year. The videos are available to view at:

Trail:	https://www.youtube.com/watch?v=yuRDrAkYkQQ
Bike:	https://www.youtube.com/watch?v=tgLmsGCxOSc
Slide:	https://www.youtube.com/watch?v=VnHbkW0ee1k
Spanish Slide:	https://www.youtube.com/watch?v=28L92DuNR7s
Spanish Trail:	https://www.youtube.com/watch?v=Ri59IyOJiZ8

Digital

SDG&E used an integrated online strategy to increase awareness and drive online submissions by using paid search, display ads, and pre-roll video ads. SDG&E digital ads were seen over 23 million times throughout the year (impressions) with over 310,000 customers clicking through to the CARE/ESA Program online application.

Bill Inserts

The annual CARE bilingual notification took place in July 2018. We also did a double-sided bill insert promoting CARE in March 2018 and November 2018. All non-CARE customers who receive paper bills received the bilingual application in their SDG&E bill, while paperless bill customers were provided a link to view their monthly bill inserts. In addition, a bilingual bill insert promoting

the CARE and ESA Programs was distributed in March 2018 through the monthly bill.

Ethnic Marketing

SDG&E reached numerous ethnic segments throughout the year with a variety of mass media tactics. Hispanic, African American, Chinese, Vietnamese, and Filipino audiences were targeted by print and digital campaigns, with a total spend of \$103,380 for ethnic media as detailed in the following tables.

CARE/ESA 2018 Ethnic Media Recap

Audience	Readership	Total Spend
Spanish	5,041,183	\$50,820
Chinese	949,568	\$8,400
Vietnamese	753,254	\$7,200
Filipino	1,458,678	\$18,300
African American	1,250,000	\$18,660
Totals	9,452,683	\$103,380

Ethnic Television		
Audience	Impressions	Total Spent
Spanish	1,818,541	\$60,000

Total 2018 Ethnic Spend	\$163,380
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Email Campaigns

In 2018, SDG&E continued the strategy of using the nurture campaign model. The nurture campaigns send a series of pre-written, automated emails to customers based on their reaction to an initial email. This allows SDG&E to

provide more customized messaging in its automated follow-up emails. The actions that determine the messaging are:

- Opened an email
- Did not open an email
- Clicked on a link within an email
- Visited a web-page
- Clicked on a link within a web-page

Customers may receive up to five messages (including reminders) over a 30-day period, depending on engagement level. This type of campaign can eliminate redundant messages or over-marketing and increase customer engagement to help bring them closer to conversion.

In 2018, SDG&E updated the CARE email creative to show customers what they would have saved if they were on CARE. SDG&E did this by showing how much the customer paid on their energy bill in 2017 versus what they would have paid if they were on CARE, and then highlighting the savings.

The campaigns contained integrated messaging, directing customers to the online application process. Throughout the campaign, subject lines and content were modified based on customer behavior. Unique open rates, defined as how many people opened the email, were as high as 60%, indicating the subject lines were compelling to customers. By comparison, the utility industry standard open rates hover around 15%; and on average, SDG&E typically maintains a 30-40% open rate with all emails.

Higher metrics for SDG&E's 2018 email campaign can also be attributed to the change in creative direction (bill comparison between with and without the CARE discount). SDG&E has seen an overall click rate increase of 6%.

Direct Mail Campaigns

SDG&E used Athens Research and SDG&E Segmentation to geographically target SDG&E customers, identifying areas with mid-high propensity for program participation. SDG&E conducted 24 direct mail campaigns in 2018 (12 for CARE and 12 for ESA). For 2018, the creative was updated to match the email. Instead of a postcard, SDG&E sent a letter showing customers what they would have saved if they were on CARE. SDG&E did this by showing customers how much they paid on their energy bill in 2017 versus what they would have paid if they were on CARE, and then highlighting the savings.

The letter encouraged recipients to call SDG&E's toll-free enrollment number or to apply through SDG&E's online application. Approximately 27,701 customers enrolled in CARE and 2,922 customers enrolled in ESA through this direct mail campaign out of the 228,182 customers.

Samples of the creative from these campaigns can be found in the Appendix D.

Lifeline Collaboration

In 2018, SDG&E continued to include information on Lifeline and provided the Lifeline toll-free phone number in the CARE acceptance letter and on SDGE.com within the Low-Income Assistance section of the website. The enhancement to SDG&E's website provides a resource for its customers seeking telephone bill assistance which can benefit the customers.

Door-to-Door

In 2018, SDG&E deployed several outreach efforts with third-party contractors. One was a continuation of a 2017 effort, which involved reaching out to multicultural / multilingual, low-income, and disabled customers who are potentially eligible for the CARE, FERA and ESA Programs utilizing a door to door strategy. This strategy was developed by looking at data analysis for new potentially eligible CARE customers and selecting areas where geographically a door-to-door representative would be most effective. SDG&E collaborated with THG, a third-party Diverse Business Enterprise (DBE) vendor, to implement this door-to-door campaign. THG canvassed these neighborhoods to directly interact with customers, in-language when necessary, to enroll them in the program.

While this type of Outreach was successful in the past, in the second quarter of 2018, SDG&E discontinued the door-to-door outreach campaign. The door-to-door campaign was not as effective as THG's Live Call Campaign; thus, it was discontinued to better utilize THG's resources. In 2018, the door-to-door and multicultural effort led to over 1,150 completed applications, 450 CARE enrollments and 449 CARE re-certifications.

Live Call Campaign

The Harris Group, utilizing the data analysis from the CARE prospect list, also continued an outbound call campaign to reach out to potentially eligible customers who live in SDG&E's service territory. THG's outbound call campaign also included a CARE Recertification Campaign. For 2018, THG Live Call Campaign and CARE Recertification Campaign efforts resulted in over

25,000 completed applications and contributed to over 17,250 new CARE enrollments and over 6,730 re-certifications, resulting in a conversion rate of 95%.

Community Outreach & Engagement

Community outreach allows SDG&E to connect and directly engage customers in energy savings solutions in the communities where they work and live. These outreach activities provide information about our CARE Program to the customers that are eligible. SDG&E established partnerships with social service entities (e.g., 2-1-1 San Diego, County Health and Human Services Agency (HHS) and Cool Zones) in these communities to connect to those customers who are unaware, concerned, afraid, or have a language barrier. SDG&E established partnerships with social service agencies and nonprofit organizations to deliver presentations, workshops/trainings, and participate at community events, to assist SDG&E in securing enrollments through an organization that customers trust. These efforts resulted in over 4,850 CARE applications, over 2,680 CARE enrollments and over 1,540 CARE re-certifications.

CARE Partners (Capitation Agencies)

SDG&E partners with 20 social service agencies such as the WIC Program, refugee assimilation organizations, 2-1-1 San Diego, and others to help enroll its hardest-to-reach customers. These organizations serve high-risk, low-income individuals, and families with enrollment in state and federally-funded assistance programs, including Cal Fresh, LIHEAP, Covered California, and

California Lifeline. The partnering organizations are located in diverse low-income communities serving multicultural/multilingual, seniors, veterans, special needs, and limited English proficient (LEP) audiences and provide multilingual staffing. These partners contributed to over 1,490 CARE applications, over 530 CARE enrollments, and over 530 CARE re-certifications.

Energy Solutions Partner Network

In 2018, SDG&E continued to work with an established network of more than 250 nonprofits and CBOs, collectively called the Energy Solutions Partner Network. These organizations represent the diversity of SDG&E's customers within its service area. A majority of these organizations are small, grassroots agencies serving customers that are multicultural/multilingual, seniors, veterans, special needs, and LEP audiences. These partners help educate and enroll customers in low-income programs utilizing a variety of tactics including: messaging through e-mail and social media channels such as Facebook, Twitter, and Instagram, posting information on their websites, e-blasts, newsletters, providing booth space at events, and hosting enrollment day fairs at their locations. In 2018, over 1,250 activities were coordinated through this partner network to promote the CARE and ESA Programs resulting in over 540,000 impressions. Of these activities, CARE and ESA Programs were promoted in over 400 social media messages – Facebook, Twitter and Instagram – by SDG&E's Energy Solutions Partner Network reaching over 400,000 impressions. The Energy Solutions Partner Network's activities were able to bring in over 680

completed CARE applications, over 250 CARE enrollments and over 280 CARE re-certifications.

Community Events & Presentations

Every year, SDG&E participates in hundreds of community events and presentations throughout its service area. Many of the Energy Solutions Network partnerships established through CBOs host events to help the community with many social services such as: health and wellness fairs, community resource fairs, food banks, police and fire department open houses, employer fairs, and cultural fairs throughout the territory, as well as educational/STEM activities through schools and communities. SDG&E believes these are excellent opportunities for SDG&E to participate since the events often attract low-income and fixed income audiences. These events are for families with children, seniors, and disabled or special needs populations. These community events also service our rural, Native American, and harder to reach population. While these events and presentations may not bring in large numbers of program enrollments, they serve a greater need of educating and engaging customers. In 2018, SDG&E promoted CARE and other customer assistance solutions at over approximately 750 presentations and events reaching over 47,000 people.

Customer Contact Center

SDG&E's Customer Care Centers assist over a million customers with various energy needs. Customers are provided with information about the CARE and ESA Programs in both English and Spanish, while waiting to speak with an Energy Service Specialist (ESS) via the IVR System over the phone. ESSs offer

the CARE Program and complete enrollments for customers who qualify. This helps to streamline the enrollment process while providing excellent customer service. In 2018, the Customer Care Centers completed 1,240 applications and contributed to over 1,010 CARE enrollments and over 120 re-certifications, yielding a conversion rate of 92%.

Branch Offices

SDG&E's Branch Offices help enroll customers in various assistance programs when the customers come in to pay their SDG&E bill or ask for bill assistance. This is done through signage at branch offices to remind customers of CARE and through the Branch Office representative when speaking to customers. In the summer of 2018, the Outreach team assisted the Branch Offices when high bills during the heat wave were received from customers. Outreach conducted informational events at the branch offices to train staff on the program changes. Outreach also provided assistance with the different language barriers of the communities including Spanish, Arabic, Tagalog, and Chinese. Outreach assisted the offices by enrolling those who were eligible into Customer Assistance Programs. In 2018, branch offices brought in over 5,160 completed CARE applications and contributed to 4,180 new CARE enrollments and over 390 re-certifications, yielding a conversion rate of 89%.

2.4.1.1 Discuss outreach to CARE customers for the Home Energy Report, including percentage participation.

In 2018, there were approximately 519,000 customers currently receiving the Home Energy Reports (HERs). Of those customers, 115,000 are enrolled in CARE (representing 22%). SDG&E sent HERs to

customers on a quarterly basis and electronic HERs emails were sent monthly. The reports educate customers on their energy consumption, provide energy saving tips and, when applicable, encourage enrollment in CARE.

Percent of HER recipients that are also on CARE	22%
Percent of CARE customers receiving Home Energy Report	39%

2.4.2 Discuss the most effective outreach method, including a discussion of how success is measured.

SDG&E continues to look for the most effective ways to communicate to customers. As stated in Section 2.4.1, in 2018 SDG&E utilized several different outreach methods to enroll eligible CARE customers. Each outreach methods’ effectiveness is measured differently depending on the method. Some outreach methods can be measured on open rates, number of impressions, number of customers educated and informed of the program and number of customers enrolled. Of the different outreach methods, it is hard to define which one was the most effective because it can take several marketing impressions before a customer takes action. However, if SDG&E is to base outreach method effectiveness on the number of CARE enrollments and the conversion rate, the most successful and effective method was “The Live CARE Call Campaign” administered by THG. This campaign resulted in over 25,000 submitted CARE applications and enrolled over 17,250 new CARE customers and resulted in over 6,730 CARE re-certifications for 2018 resulting in an 95% conversion rate. To measure the success of some outreach methods, SDG&E provides each CARE partner, contractor, and activity a unique source code number that they submit

with each CARE application. This allows SDG&E to track each CARE application, CARE Recertification and CARE Enrollment by source.

2.4.3 Discuss barriers to participation encountered during the reporting period and steps taken to mitigate them.

SDG&E's CARE Program continues to face barriers to program participation and must constantly evaluate and sometimes shift its focus to determine ways to counteract these challenges. In 2018, to gain a better understanding of these barriers from the customer's perspective, the program surveyed program participants. The survey results revealed that most participants remain satisfied with the CARE Program (92%) and expect to continue participating. The surveys also provided the following insights:

- 1) Most CARE customers prefer the program renewal contact by email, direct mail or telephone (with a live representative); however, bill stuffers and text messages have grown this period as another source of communication; and
- 2) Ease of understanding the enrollment process has softened in 2018.

2.4.4 Discuss how customer data CARE and other relevant program information is shared by the utility with other utilities sharing its service territory.

SDG&E has a 2-way sharing of data for customers in Orange County who are served by both SoCalGas and SDG&E. In 2018, SDG&E received 5,745 enrollments through this effort. In addition, SDG&E shares CARE customer data with California American Water (CalAm) to assist in identifying customers for their customer assistance programs. In 2018, SDG&E provided 45,975 leads in March 2018 and 47,067 in September 2018 to CalAm.

2.4.5 Discuss how CARE customer data and other relevant program information is shared within the utility, for example, between its Energy Savings Assistance Program and other appropriate low-income programs.

SDG&E implemented system enhancements to the CARE System to improve customer experience, improve CARE penetration and provide qualifying leads for ESA. Upon an eligible online enrollment or recertification for the CARE Program, the CARE System automatically sends an ESA lead to the Energy Efficiency Collaboration Platform (EECP) system if the customer is determined to be eligible based on the prior treated date. Upon an eligible income verification for the CARE Program, an ESA lead is automatically created stating “CARE Income Certified,” letting the outreach agency know they do not need to perform the income eligibility process for this customer. In turn the EECP System sends the CARE System ESA eligibility upon an ESA enrollment. The CARE System determines if the customer will be auto-enrolled, income certified or recertified in the CARE System based on their current CARE status. This automation has increased the number of qualified leads and CARE enrollments as well as reduced the number of letters sent for CARE recertification and PEV.

2.4.6 Describe the efforts taken to reach and coordinate the CARE Program with other related low-income programs to reach eligible customers.

SDG&E partners with CBOs and social service providers throughout San Diego and this continues to be an effective form of enrolling customers into the CARE/FERA and ESA programs. These organizations are involved daily with customers that meet SDG&E’s income or categorical qualifications and provide a one stop source for resources. Some of these organizations are: WIC, CalFresh,

LIHEAP, Covered California and California Lifeline. Other partners include the CARE Partner Program with social service agencies and 2-1-1 San Diego, SDG&E's Energy Solutions Partner Network, and leveraging the efforts of LIHEAP contractors. These programs were leveraged through presentations, events, workshops, and customized partner network messaging.

2.4.6.1 Track Costs of AB 793 related Energy Management Technologies programs (Identify all of the programs or initiatives that will be able to benefit from the availability of the end-use and electric usage profiles, and to coordinate with the relevant proceedings so that the relevant costs can be considered in those proceedings' cost-effectiveness decision-making).

An RFP for a vendor to provide load disaggregation services was released in March 2018. A contract was signed with the selected bidder, Ecotagious Inc., in November 2018. The project scope is divided into two phases. Phase one will produce end use load profiles and a segmentation report for a sample of CARE customers in the PG&E, SCE and SDG&E service areas. Phase two will expand the analysis to a wider group of customers and provide delivery of results to customers and ESA contractors. The statewide group meets biweekly. In 2018, three milestones were met: (1) The contract was signed, (2) The project plan for phase 1 was finalized, and (3) The customer segmentation design was completed. The results for phase 1 are expected by mid-year 2019.

2.4.7 Describe the process for cross-referral of low-income customers between the utility and CSD. Describe how the utility’s CARE customer discount information is provided to CSD for inclusion in its federal funds leveraging application. (Note: These agreements are limited to sharing 1-800 phone numbers with customers and providing CARE benefit information for the federal fiscal year, October 1 of the current year through September 30 of the subsequent year. There are no tracking mechanisms in place to determine how many customers contact the other programs or actually become enrolled in other program(s) as a result of these agreements.)

SDG&E continues to find value in leveraging with partners such as CSD.

This partnership demonstrates SDG&E’s commitment to utilize every feasible effort to reach out to customers in need. SDG&E promotes the CSD’s LIHEAP bill payment assistance and weatherization services programs, and also includes CSD LIHEAP’s phone number on SDG&E’s CARE applications and program materials so that customers have direct contact information to access services. SDG&E’s CARE staff also informs customers about services offered by CSD and refers customers to CSD for additional bill assistance through the HEAP. Lastly, SDG&E’s agreement with 2-1-1 San Diego requires part of the customer screening to include referral to LIHEAP agencies CUI and MAAC, as appropriate. In 2018, 2-1-1 San Diego handled approximately 25,120 utility-related calls and referred 16,903 of those to LIHEAP agencies.

2.4.8 Discuss any recommendations to improve cost-effectiveness, processing of applications, or program delivery. Discuss methods investigated or implemented by the utility or third parties under contract to the utility to improve outreach and enrollment services to non-participating households in the prior year. Provide cost-effectiveness assessments, if available.

Significant improvements include the following:

1. SDG&E continued to realign efforts with THG. In 2018, upon request of SDG&E, THG stopped the Door-to-Door campaign which enrolled customers in CARE or FERA through neighborhood canvassing. This request came as results indicated that the Live Call Campaign was more effective relative to time, cost, and program enrollments. Upon SDG&E's request, THG reallocated resources from the Door-to-Door campaign to the Live Call Campaign.
2. In 2018 SDG&E continued to streamline the communication and enrollment process with 211 San Diego. Giving 211 employees working with utility related calls, read-only access to SDG&E's CARE system. This improvement allowed processing time to be minimized for both SDG&E and 211 San Diego, as well as, make sure CARE was applied as soon as possible to customers' bills. 211 San Diego is now able to look up basic customer information such as the name on the account, account number, and programs the customer is already enrolled. This change allows 211 San Diego to be more efficient with their submissions and reduces the data points SDG&E has to research. When the customer does not have access to their bill or account number, this data can be identified while the customer is on the phone, eliminating the need for a second call, or drop-off of enrollment.
3. SDG&E's Customer Contact Center can now enroll customers in CARE through the CARE Online Application. The customer's information is automatically authenticated through a link to the on-line application making this process more efficient for the Customer Contact Center representatives to process the application.
4. SDG&E also made improvements to its My Account messaging. Using the existing probability model designed for CARE PEV, the residential customers have been assigned a probability score determining their likelihood of being eligible for the CARE Program. When a customer logs into SDG&E My Account site, the customer probability score determines if a message should be displayed stating "you are likely to be eligible for the CARE

Program” and a link to the CARE on-line application to enroll. This will increase the focus on the eligible population. The program is showing positive results with approximately 600 new enrollments a month.

5. In the first quarter of 2019, SDG&E will transition to a new fulfillment vendor that was selected through a competitive bid process in late 2018. In 2019, SDG&E expects improvements in the delivery, quality, and efficiency of letters mailed to CARE and FERA participants, as well as a reduction in fulfillment costs.

2.5 Processing CARE Applications

2.5.1 Describe the utility’s process for recertifying sub-metered tenants of master-meter customers.

In general, tenants of sub-metered facilities follow similar recertification guidelines as individual metered dwellings. Sub-metered tenants are provided with a two-year or a four-year recertification period, depending on whether they can be identified as fixed income tenants. Once sub-metered tenants are due to recertify, they are provided with a mailed renewal request. If no response is received within 30 days, SDG&E will mail a second request to the tenants prior to removal.

2.5.2 Describe any contracts the utility has with third parties to conduct certification, re-certification and/or verification on the utility’s behalf. Describe how these third-party efforts compare to the utility’s efforts in comparable customer segments, such as hard-to-reach or under-served. Include comparisons of effectiveness and cost-effectiveness of comparable customer segments, if available.

SDG&E finds that collaboration with third party contractors is a necessary component to successfully reach and enroll hard-to-reach and under-served customers. In 2018, SDG&E partnered with third parties to conduct certification and re-certification of CARE customers on the utility's behalf. SDG&E contracted with THG to conduct a Door-to-Door Campaign, Live Call Campaign, CARE Re-

certification Campaign, and Zip Code Campaign resulting in over 17,700 CARE enrollments and over 7,180 re-certifications. SDG&E also partnered with 2-1-1 San Diego, a 24-hour resource and information center connecting residents with community, health and disaster services. Customers often contact 2-1-1 San Diego in an emergency to locate important resources including bill assistance programs, food, and shelter. The 2-1-1 San Diego partnership resulted in over 1,950 CARE enrollments and over 570 CARE re-certifications.

Additional SDG&E outreach activities are detailed in Section 2.4.1. These activities include: mass media, print campaigns, streaming TV, digital, bill inserts, ethnic marketing, email campaigns, direct mail campaigns, community outreach & engagement, CARE partners, Energy Solutions Partner Network, community events & presentations, customer contact center and branch offices. SDG&E measures the effectiveness of this program in two ways. The first measure of success is generating overall program education and awareness through mass media and community outreach tactics. The second is customer engagement to generate and measure enrollment. For these harder-to-reach and underserved audiences, it is important to utilize multiple tactics as stated above. It is difficult to evaluate cost-effectiveness per tactic, given that some of these tactics cannot be directly sourced to the actual customer enrollment and/or that the customer may experience multiple tactics prior to completing recertification as detailed in Section 2.4.2. This is especially true for mass media tactics like television, print and online advertisements. In 2018, SDG&E's online advertising garnered over 23 million impressions (the number of times an SDG&E ad was seen by an on-

line user) while ethnic print advertising had a readership of over 9.4 million and ethnic television garnered over 1.8 million impressions. All mass media channels encouraged customers to call SDG&E's toll-free number or visit SDG&E's website to complete an online application. It is challenging to determine how many impressions it took for customers who enrolled through the toll free and online application process. However, industry experts have stated that it may take between 7-13 touches before a consumer takes action and responds to a tactic.²²

2.6 Program Management

2.6.1 Discuss issues and/or events that significantly affected program management in the reporting period and how these were addressed.

SDG&E did not experience any significant program management issues in the 2018 reporting period.

CHANGES Program

D.15-12-047 transitioned the CHANGES pilot to the CHANGES Program. The CHANGES Program is funded through the CARE Program through the 2017-2020 program cycle. The Commission provided the IOUs with a list of CBOs who act as liaisons with the utilities on behalf of customers on utility inquiries and issues. The selection of CBOs is determined based on the lead contractor that contracts directly with the Commission. The lead contractor selects CBOs and subcontracts with them based on its own criteria. The CBOs target specific communities and offer other programs that are meant to complement SDG&E's services. SDG&E has three CBOs within its service territory as shown below:

1. Alliance for African Assistance
2. Deaf Community Services of San Diego

²² Accenture, Actionable Insights for the New Energy Consumer, 2012.

3. Casa Familiar

The lists of CBOs in SDG&E's service territory were shared with SDG&E's internal Call Center and outreach team. The IOUs and CHANGES teams met regularly in 2018 to discuss program effectiveness.

2.7 Pilots

There were no pilots in 2018.

2.8 Studies

There were five studies undertaken in 2018 for Low Income. Of the five studies, only the LINA Study includes CARE.

Statewide Low Income Needs Assessment (LINA) Study

The LINA Study is mandated to be completed every three years per AB 327 and Public Utilities Code Section 382(d). During 2018 the following activities have taken place: Research Into Action was selected to conduct the study in January 2018. SCE formalized the contract in January 2018. A project initiation meeting was held in February 2018. The final research plan was developed during Q1 of 2018. A public workshop on the draft research plan was held on May 3, 2018. Data collection plans and instruments were developed over the course of Q2-Q4 2018. Research into Action began collecting data in December 2018. The primary activities of the initial quarters of 2019 are expected to include additional data collection and preliminary analyses. The draft report is expected to be completed in August 2019 followed by a public workshop to review the results with the public and solicit stakeholder input. The current Needs Assessment study is on track to be completed by December 2019.

2.9 CARE Restructuring Working Group

On December 20, 2017, the Commission issued a Ruling²³ suspending the procedural schedule for the CARE Restructuring Track of Residential Rate Reform until further notice. In 2018, there were no activities relative to the CARE Rate Restructuring effort.

2.10 Miscellaneous: Describe coordination efforts with the California Advanced Services Fund's new Broadband Public Housing Account.

In 2018, there were no coordination efforts with the CASF new broadband public housing account.

3 CARE EXPANSION PROGRAM

3.1 Participant Information

3.1.1 Provide the total number of residential and/or commercial facilities by month, by energy source for the reporting period.

2018	Commercial		Residential	
Month	Electric	Gas	Electric	Gas
Jan	151	106	408	245
Feb	151	106	453	245
Mar	151	106	454	245
Apr	154	107	468	251
May	156	108	468	251
Jun	149	104	467	249
Jul	148	107	472	251
Aug	155	109	472	252
Sep	155	109	473	253
Oct	156	109	478	258
Nov	159	109	478	258
Dec	161	109	478	258

²³ E-Mail Ruling Suspending Procedural Schedule for CARE Restructuring Track in R.12-06-013.

3.1.1.1 State the total number of residents (excluding caregivers) for residential facilities, and for commercial facilities, by energy source, at year-end.

Facility Type	Electric	Gas
Commercial	5,558	3,343
Residential	1,555	798

3.2 Usage Information

3.2.1 Provide the average monthly usage by energy source per residential facility and per commercial facility.

Commodity	Residential	Commercial
Gas	32.6	382.3
Electric	485.7	8,891.6

3.3 Program Cost

3.3.1 Administrative Cost (Show the CARE Expansion Program’s administrative cost by category).

In 2018, SDG&E’s Expanded CARE Program costs totaled \$3,284.87.

These costs are associated with application processing.

3.3.1.1 Discount Information

3.3.1.2 State the average annual CARE discount received per residential facility by energy source.

Residential Facility Gas Discount	\$95
Residential Facility Electric Discount	\$655

3.3.1.3 State the average annual CARE discount received per commercial facility by energy source.

Commercial Facility Gas Discount	\$574
Commercial Facility Electric Discount	\$4,578

3.4 Outreach

3.4.1 Discuss utility outreach activities and those undertaken by third parties on the utility's behalf.

SDG&E has skilled and knowledgeable Energy Solutions Advisors that promote programs such as Expanded CARE with partners who manage multifamily low-income housing. The SDG&E Advisor team also promotes Expanded CARE through general outreach activities. The Advisors work with SDG&E's CBOs, Energy Solutions Partner network, Community Relations Advisors and Account Executives to deliver presentations, booths at community events, and e-updates including newsletters and social media posts.

Discuss each of the following:

3.4.1.1 Discuss the most effective outreach method including a discussion of how success is measured.

The most effective outreach method to promote Expanded CARE is through SDG&E's skilled and knowledgeable customer facing team, consisting of assigned Account Executives, Energy Solutions Advisors, and Outreach Advisors. These groups work directly with customers who may be eligible for Expanded CARE and with CBO's who work directly with clients who may be eligible.

3.4.1.2 Discuss how the CARE facility data and relevant program information is shared by the utility with other utilities sharing service territory.

The shared territory between SDG&E and SoCalGas is in Southern Orange County. The two utilities share relevant program information on Expanded CARE facilities. SDG&E has three qualified Expanded CARE facilities in the overlapping service territory.

3.4.1.3 Discuss barriers to participation encountered in the prior year and steps taken to mitigate these, if feasible, or not, if infeasible.

The barrier to participation for Expanded CARE tends to come from the ability for these facilities to meet the guidelines – specifically 100% resident eligibility and non-profit status of the organization. In 2018, SDG&E’s Outreach team worked with the assigned Account Executive to make sure eligible customers were enrolled. SDG&E also promoted the program through general outreach activities and through the Energy Solutions Partner network.

3.4.2 Discuss any recommendations to improve the cost-effectiveness, processing of applications, or program delivery. Discuss methods investigated or implemented by the utility or third parties on the utility’s behalf to improve outreach and enrollment services to non-participating facilities in the prior year. Provide cost-effectiveness assessments, if available.

SDG&E did not implement any system enhancements in 2018 relative to CARE Expansion. SDG&E plans to implement customized outreach efforts to increase CARE Expansion Program enrollment in 2019.

3.5 Program Management

3.5.1 Discuss issues and/or events that significantly affected program management in the reporting period and how these were addressed.

SDG&E did not experience any significant program management issues in the 2018 reporting period.

4 FUND SHIFTING

4.1 Report Energy Savings Assistance Program fund shifting activity that falls within rules laid out in Section 20.1 of D. 08-11-031 as modified by D.10-10-008, 16-11-022, and D.17-12-009.

In 2018, SDG&E experienced a budget shortfall in the lighting subcategory of the

ESA Program in the amount of \$1,358,410 in electric funds. The budget shortfall was due to SDG&E offering additional LED lighting measures in its program in accordance with Ordering Paragraph 19 of Commission D.17-12-009 which directs the electric IOUs to phase out compact fluorescent light bulbs as soon as practicable and to begin offering LED lighting. SDG&E used unspent electric funds shifted into 2018 from the prior year to accommodate the budget overage in the lighting subcategory.

4.1.1 Report CARE fund shifting activity that falls within rules laid out in Section 20.1 of D. 08-11-031 as modified by D.10-10-008, D.16-11-022, and D.17-12-009.

During 2018, SDG&E shifted CARE funds in accordance with the rules set forth in D. 08-11-031 as modified by D. 10-10-008, D. 16-11-022, and D. 17-12-009, which granted the IOUs authority to shift funds between the CARE Program categories. SDG&E leveraged excess funds in the General Administration category to cover overages in the Processing, Certification and Recertification category. A total of \$99,637 from General Administration was shifted to cover a \$99,637 overage in the Processing, Certification and Recertification category.

4.1.2 Was there any Energy Savings Assistance Program or CARE fund shifting activity that occurred that falls OUTSIDE the rules laid out in Section 20.1 of D. 08-11-031 as modified by D.10-10-008, D.16-11-022, and D.17-12-009?

There was no ESA Program or CARE Program fund shifting activity that occurred that falls outside of the rules laid out in the Section 20.1 of D.08-11-031, as modified by D.10-10-008, D.16-11-022, and D.17-12-009.

5 COMMONLY USED ACRONYMS

CARE	California Alternate Rates for Energy
CBO	Community-Based Organization
CFL	Compact Fluorescent Lamp
CPUC	California Public Utilities Commission
CSI	California Solar Initiative
D.	Decision
CSD	California Department of Community Services & Development
DDTP	Deaf and Disabled Telecommunications Program
DRP	Demand Response Program
DSM	Demand Side Management
EE	Energy Efficiency
ESA	Energy Savings Assistance
FERA	Family Electric Rate Assistance
HEAT	Home Energy Assistance Tracking
IHD	In Home Display
IOU	Investor-Owned Utility
kW	Kilowatt
kWh	Kilowatt Hour
LIEE	Low Income Energy Efficiency
LIHEAP	Low Income Home Energy Assistance Program
MOU	Memorandum of Understanding
mW	Megawatt
mWh	Megawatt Hour
NGAT	Natural Gas Appliance Testing
OP	Ordering Paragraph
PCT	Programmable Communicating Thermostat
PEV	Post Enrollment Verification
PFM	Petition for Modification
PG&E	Pacific Gas and Electric Company
PPP	Public Purpose Program
PY	Program Year
SCE	Southern California Edison Company
SDG&E	San Diego Gas & Electric Company
SoCalGas	Southern California Gas Company
TDD	Telecommunications Device for the Deaf
TRC	Total Resource Cost Test
UC	Utility Costs
SSI	Supplemental Security Income
SSD	Supplemental Security Disability
SSP	Social Security Pension