

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the Low Income Energy Efficiency Programs of California's Energy Utilities.

Rulemaking 07-01-042
(Filed January 25, 2007)

Southern California Edison Company's (U 338-E) Application for Approval of SCE's "Change A Light, Change The World," Compact Fluorescent Lamp Program.

Application 07-05-010
(Filed May 10, 2007)

**COMMENTS OF SIERRA PACIFIC POWER COMPANY (U 903-E) ON
RENTER ACCESS TO LOW INCOME ENERGY EFFICIENCY PROGRAMS AND
AB 2104 IMPLEMENTATION**

June 13, 2007

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I. INTRODUCTION

Sierra Pacific Power Company ("Sierra") hereby submits these comments responsive to the Administrative Law Judge's May 22, 2007 Ruling.¹ Due to an inadvertent oversight Sierra did not file comments on June 4, 2007, as required by the Ruling. With permission of Administrative Law Judge Kim Malcolm granted by email on June 13, 2007, Sierra now submits its comments on the May 22, 2007 Ruling.

II. COMMENTS ON MAY 22, 2007 RULING

The May 22, 2007 Ruling asks respondent utilities and other interested parties to address whether renters have adequate access to low income energy efficiency (LIEE) programs, and whether tenants of master-meter customers have adequate access to California Alternative Rates

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

for Energy (CARE) discounts as required by AB 2104. Sierra responds to each of the questions posed in May 22, 2007 Ruling below.

A. Renter Issues

Sierra supports the Commission's objective to provide renters with adequate access to LIEE programs. Sierra provides the following comments on the questions pertaining to renter access:

- 1) How many houses, apartments, and mobile homes have not yet received LIEE measures? These figures should be broken down between rented units and those that are owned by customers who qualify for LIEE benefits.**

Sierra Response: Based on CARE eligibility, Sierra estimates that approximately 1,150 customers have not yet received LIEE measures. The ratio of rental units to owned units is approximately 50:50.

- 2) Are there barriers to renter participation in LIEE programs that are more critical than the limits of utility LIEE budgets? If so, what are they and what can or should the Commission do to remove those barriers?**

Sierra Response: Sierra's LIEE program follows the regulations outlined in the 2006 LIEE Statewide Policy & Procedures Manual. In applying the policies enunciated in Section 2.7 Treatment of Rental Units, Sierra has not found barriers to renter participation. Sierra and Southwest Gas Corporation share customers in the Lake Tahoe region to the extent possible, and enroll customers on a first-come, first-served basis. There is no distinction held between owners versus renters for outreach and intake personnel.

- 3) How detrimental is a landlord's refusal to permit LIEE installations to broaden LIEE participation by renters? Would legislation be needed or useful to overcome barriers caused by landlords? What if anything should the Commission do to promote landlord interest and cooperation?**

Sierra Response: In Sierra's experience, landlords or property owners rarely refuse to permit renters to participate in the LIEE program. Rather, the principal problem involves completing

applications for renters who have minimal or incomplete contact information for their property owners. Sierra believes that the LIEE program is welcome by most owners, and that additional action by the Commission is not necessary.

4) Would increased focus on marketing LIEE installations in public housing or housing owned by non-profit organizations improve renter participation? If so, does the Commission need to take any actions to promote this?

Sierra Response: No.

5) Are there ways to improve access to LIHEAP funds or other funding sources that would complement the LIEE program? What should the Commission do to promote their availability?

Sierra Response: Sierra contracts with a program administrator and installation contractor who are well-versed in the LIHEAP program requirements and who also provide services for the California Department of Community Services and Development (CSD). To the greatest extent possible, customers who qualify for the services of both the LIEE and LIHEAP programs are served within the same installation visit and benefits for both programs are leveraged to provide the greatest complement of services. Sierra believes that there is adequate access to LIHEAP when Community Based Organizations provide services for both programs.

6) Are there other ways to improve the LIEE program to increase renter participation or make the program more fair or accessible to renters?

Sierra Response: At the May 10, 2007 Renter Access Workshop, Sierra indicated in the presentation to which the small and multi-jurisdictional utilities (SMJU) contributed that its percentages of renter participation is approximately equal to, or slightly higher, than the participation level for homeowners. Therefore, Sierra believes that its current outreach methods to renters have been fair and at least as successful as outreach to homeowners. Sierra does not propose additional methods to improve renter participation at this time.

B. AB 2104 Issues

- 1) How can a sub-metered tenant apply for CARE discounts? If the application is incomplete, what should the utility do to follow-up with the applicant to complete enrollment? What information does the sub-metered tenant need to provide in order to enroll in CARE?**

Sierra Response: Sierra has a full service contract with the CSD to perform all functions related to the eligibility and re-certification requirements of CARE applicants. To apply for CARE, sub-metered tenants need to complete an application, and provide income verification and a copy of their electricity bill to the CSD. To receive their discount, the CSD places them on Sierra's weekly report, mails a letter informing them they are CARE eligible, and instructs them to give their landlord or coordinator a copy of the CSD letter. If the application is incomplete CSD notifies the sub-metered tenant by letter requesting the missing information.

- 2) How does the utility keep track of sub-metered tenants?**

Sierra Response: Sierra updates its sub-metered tenant list data weekly based on the reports received from CSD.

- 3) How does the utility renew sub-metered tenants' participation in CARE?**

Sierra Response: The CSD contacts Sierra's sub-metered CARE tenants via letter and new application to reapply for CARE.

- 4) Does the utility provide master-metered customers with the names of sub-metered tenants who are approved to receive the CARE discount? If so, how often does that occur? What other types of information does the list provide, if any? Who receives this list? How does the utility handle the turnover of mobile home park management or owner? Would a monthly list sent to the master-metered customer that request notification of change of ownership assist the utility company in managing ownership turnover?**

Sierra Response: Sierra's monthly billing statements to our master-metered customers list the tenant unit numbers receiving the CARE discount. Sierra has not experienced a problem with turnover of mobile home park management or owners in its service territory.

5) How many master-metered tenants does each utility serve?

Sierra Response: As of December 31, 2006, Sierra served 42 master-metered customers with sub-meters. These customers serve approximately 870 tenants.

6) How many sub-metered tenants are eligible for the CARE program in California?

Sierra Response: Sierra estimates there are 90 sub-metered tenants eligible for the CARE program.

7) How many sub-metered tenants are enrolled in CARE?

Sierra Response: As of December 31, 2006, Sierra had 70 sub-metered tenants receiving the CARE discount.

8) How do the utilities contact sub-metered customers or tenants to inform and enroll them in the CARE program?

Sierra Response: Sierra does not contact the tenant but relies upon the CSD to inform and enroll tenants based upon its contract with the CSD.

9) How do utilities communicate with sub-metered customers/tenants when following up with customer service requests? If utilities do not provide this information, please explain why and possible methods to address these issues which may improve customer service to CARE recipients.

a. CARE enrollment status

Sierra Response: The CSD communicates with tenants concerning CARE customer service.

b. Enrollment assistance

Sierra Response: Sierra's CARE application has a toll free number for applicants to call the CSD for enrollment assistance.

c. Verification that the CARE discount is given to the Master-Metered Account

Sierra Response: Sierra will verify that the space number was included on master-metered customer's monthly billing statement.

d. Verification that the CARE discount has been given to the sub-metered tenant if the bill is provided.

Sierra Response: If a tenant contacts Sierra about their CARE enrollment, Sierra will verify that their space number was included on the master-metered customer's monthly billing statement.

10) How do utilities provide education and outreach to master-metered customers about billing and CARE discounts?

Sierra Response: Since November 2006, Sierra has offered a master-meter billing calculator on our website to assist customers.

11) Do the utilities coordinate the outreach conducted under the LIEE program?

Sierra Response: Sierra's LIEE outreach materials also include information about our CARE program.

12) What remedial actions do the utilities take if it learns that the CARE discount has not been passed to the sub-metered tenant? Does the utility work with County Weights and Measures agencies to assure tenants receive the CARE discount owed to them?

Sierra Response: If Sierra learns that the CARE discount has not been passed to a sub-metered tenant, we will contact the master-metered customer. Sierra has not worked with County Weights and Measures regarding CARE discount issues.

13) What can or should the Commission do to promote the CARE program among sub-metered tenants?

Sierra Response: The Commission should continue to support utilities as they explore outreach partnerships with other utilities and master-metered account holders. The goal would be to

educate the account holders about the CARE program and request that they provide CARE information to all of their tenants, including CARE signage and applications posted in their common areas. The commission could co-host future CARE outreach or education efforts with master-metered parks to explain the program's benefits, requirements, and penalties.

14) What can or should the Commission do to assure sub-metered tenants receive the CARE discount the utility provides?

Sierra Response: A statewide education program for all master-metered account holders could be beneficial not only to account holders but also to their tenants.

15) What can or should the Commission do to improve the communication between the master-metered account holder and the utility company?

Sierra Response: Please see Sierra's response to question 14.

16) What can or should the Commission do to improve the communication between the sub-metered account holder and the utility company?

Sierra Response: Please see Sierra's response to question 14.

Sierra looks forward to working with Commission staff and other interested parties to improve access to the LIEE and CARE programs.

Respectfully submitted,



Dated: June 13, 2007

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Certificate of Service

I hereby certify that I have this day served a copy of “COMMENTS OF SIERRA PACIFIC POWER COMPANY (U 903-E) ON RENTER ACCESS TO LOW INCOME ENERGY EFFICIENCY PROGRAMS AND AB 2104 IMPLEMENTATION” on all known parties to R.07-01-042 and A.07-05-010 by transmitting an e-mail message with the document attached to each party named in the official service list. Parties without e-mail addresses were mailed a properly addressed copy by first-class mail with postage prepaid.

Executed on June 13, 2007, 2007 at Sacramento, California

_____/s/_____

Eric Janssen

R.07-01-042
A.07-05-010
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