### LIOB LIEAP Subcommittee 09132022 SCE (ESA) Program & Budget Status Update Summary

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A personal note: I want to personally thank all who attended and contributed to a most important discussion of issues regarding SCE's ESA program and budget. The following is an itemized listing of issues raised and discussed. They are:

## Adding, Modifying & Removing ESA Main Measures

There was discussion as to the need for a clear and concise protocol (as delineated in ESA/CARE/FERA Decision) regarding ESA main measure offerings and the dismissal of program measures. Whereas the Commission previously retained approval for measure-related changes, the IOUs now possess authority to institute these changes after **collaboration** with the ESA Working Group and providing notice through their monthly filing. SCE is requested to adhere to this process of collaboration with the ESA Working Group and to provide notice of ESA measure changes via their monthly filing. This process ensures transparency and inclusion as envisioned by the Commission. Collaboration with the ESA Working Group consisting of program stakeholders, contractors and participants and is part of the public record. This process allows the IOUs to evaluate, revise and modify measures to best meet the goals of the Decision and the low-income customer. This process, its findings and conclusions should also be published in the respective IOU monthly reports. It is further advised that this matter be discussed, defined and a formal process assigned by the ESA Working Group.

# **Improved Communication**

The subcommittee opined that two-way communication is in the best interests of the ESA Program and the populations ESA serves. Many of the ESA contractors have been with the ESA program for over two decades and know the program metrics and the eligible communities and their needs very well. Their experience is valuable, and it should be harnessed to make the ESA program as effective and efficient as possible. It is recommended that Southern California Edison should immediately establish means of effectively communicating plans for completing the transition to the 2023 ESA, including fulfilling service commitments to enrolled customers and forecasting program service delivery for the remainder of the 2022 program cycle to best position the existing ESA workforce to meet remaining 2022 service objectives.

### **LIOB Oversight**

The full LIOB should discuss and determine IOU reporting metrics and benchmarks to inform the board of their respective transitional plans and program impacts at its quarterly meetings. Subject matter should include, but not limited to, ESA program transition plans, real or potential program disruptions, timetables for new program elements, the dismissal of measures and why, status of the ESA workforce, affordability impacts, to date allocation of funds and funds that are spent and unspent.

# **ESA Budget Flexibility**

The Decision restricts ESA Main budget dollars to the appropriated fiscal year not allowing for financial/budget flexibility. Unforeseen impacts given increased customer demand and growing wait lists have resulted in SCE ceasing to enroll new customers via their outreach and enrollment contractors. The ESA workforce - specifically in the Southern California Edison territory – has seen significant layoffs and program disruptions due to a significant transition into the new program. The CPUC should address this issue with a stable, flexible, and sustainable funding stream that appropriately finances ESA operations to ensure that eligible customers are served, and the ESA workforce is part of this transition to the new program.

#### Clarification As to The Installation Of "All Feasible Measures" In The ESA Program As Delineated In PUC Code 2790.

This clarification by the Energy Division will significantly aid the IOUs in establishing program deliverables that best meet the needs and requirements of the customer and program compliance. Absent clarification as to the determining process of "all feasible measures" it will be next-to-impossible to know what customers are eligible to receive. Clarification of an all feasible measures set of guidelines will avoid arbitrary and subjective decision making on behalf of the program and our customers.

### **Mitigating Service Impacts to Customers**

Southern California Edison should recalibrate its 2022 ESA budget to ensure sufficient funding remains to honor service commitments to Edison customers with expressed interest in ESA services and enrolled in the program. Edison should pursue all administrative options at its disposal to render timely service response to these customers, preferably by the conclusion of the 2022 program cycle.

#### **ESA Workforce Contracting**

Southern California Edison should structure contracts with ESA service providers in a manner that expressly defines services delivery, budget, and service work expenditures by specific time periods covering the entire span of the ESA annual contract cycle. This method of calibrating contractor budgets, service delivery, and reimbursement payments will enable ESA contractors to better manage its program operations and operating expenses over the course of the entire program year cycle and lull periods due to accelerated performance by a contractor.

### **CPUC**

The 2023 ESA program cycles marks a critical point for enhancing ESA measuring offerings and service investment in qualified dwellings, this, combined with recent eligibility expansion for ESA, the CPUC shall establish of annual and multi-year market penetration goal achievement across all IOUs. In addition, the CPUC should define metrics to effectively measure first-year implementation of the 2023 program design in order derive new baselines for average service investment.