Issue	Brief Description	Recommendation
1. **Consistency of rates, policies and practices across the entirety of the ESA program.**	There are four major IOUs running separate programs with proprietary guidelines, system platforms, practices and policies resulting in inconsistencies and customer confusion in program delivery, especially for contractors serving eligible populations with multiple IOUs.	~~The Energy Division should convene a workshop to determine statewide standardized practices (where possible) across the entirety of the ESA program. These standardized practices should be implemented during the next program cycle or as soon as is feasible.~~ Over the course of the 2025 calendar year, the LIOB observed challenges with ESA program administration (by certain IOUs). In response, the LIOB offers this recommendation to effectuate successful administration of ESA and achievement of ESA-specific goals and objectives across all IOU service areas. The LIOB recommends development of an ESA Standardization Team (EST). This concept was instituted in a previous Decision and worked well. The EST is envisioned to work with the IOUs to make sure that the ESA program meets its goals in keeping with Key Performance Indicators (KPIs) established by the CPUC & the LIOB. Such performance indicators include, but are not limited to the success/failure of ESA management systems and operations, program energy efficiency goals, homes treated goals, health, comfort and safety targets, program spend by category, unspent dollars, etc. A public workshop convened by the Energy Division and LIOB shall serve as the forum to inform the identification of KPIs, monitoring,

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		and standardization practices across the entirety of the ESA program. If realized and ordered by the ALJ these recommendations will ensure ESA Program accountability, improved transparency and enhanced inclusion of program implementers (contractors) and other program stakeholders.
2. **Market Rate Analysis to be done by the Energy Division**	The IOUs have incorporated a range of 3% cost increases regarding full delivery and implementation of the program. That percentage increase has the possibility of being overly subjective as to the original baseline paid to contractors.	The Energy Division should ~~convene~~ complete an independent market rate analysis to establish fair compensation for ESA third-party contractors and to be used in conjunction with an IOU's procurement method for identifying and contracting with ESA contractors. The LIOB highly recommends use of this market analysis ~~to function as a tool to be used by the Commission, the IOUs and their contractors to establish fair compensation~~ over the course of the 2028-2033 program cycle.~~resulting in retention of both a trained and skilled workforce and best of breed contractors.~~
3. **Targeting DAC's, rural communities and hard-to-reach communities**	While it is acknowledged IOUs have made noteworthy attempts to improve the service reach of ESA to California Tribal Areas, these efforts have yielded marginal improvement to date. IOU applications for the 2028-2033 program cycle propose to maintain use of existing outreach, enrollment, and service delivery strategies to promote awareness and the extending of ESA services to tribal	Propose a study to specifically understand the needs for ESA services within California Tribal Areas, barriers/challenges to providing ESA using existing outreach and service delivery strategies, and the identification of new strategies to overcome noted barriers/challenges and better position ESA to serve the energy needs of tribal areas. These strategies shall include, but not be limited to other ESA administration models, ESA measures unique for California Tribal Areas

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	areas. To effectively serve this hard-to-reach and hard-to-serve customer segment, new strategies and approaches are needed in order to make more meaningful strides to serving this customer segment over the course of the next program cycle.	(state and/or federally recognized) and sustained funding for Tribal Leaders of Groups to successfully market the program. Ensure the Decision for the next program cycle includes the flexibility to incorporate new strategies and outcomes from this study into the ESA program. Apply the learnings from this study to inform changes to evolve marketing, outreach and service delivery strategies focused on tribal areas. There should also be an effort to discover other government agencies, NGOs and/or CBOs that deliver third party services, outreach, and information related to tribal public purpose or public assistance programing. Identifying these entities and their incumbent methodologies may better inform more efficient ESA program outreach and enrollment as well as maximizing ratepayer ME&O investments.
4. Workforce Management and Development	IOU applications reflect different strategies and investments to support the ESA workforce. Understanding the ESA workforce is the figurative backbone of ESA performing all facets of from customer acquisition to servicing, it's time that IOUs adopt a different philosophy for maintaining a competent and well-trained workforce – one that pools IOU	Recommend IOUs pool workforce development investments to create a shared, high-quality, and cost-effective training system that provides standardized training support and resources for the entire ESA workforce. The current WE&T system is inefficient and not sustainable with regard to employee retention and cost put on employers. Also, development of such a training system must include

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	workforce-related investments to realize economies of scale benefits.	employers (contractors) in the design and implementation of a more effective WE&T. Discontinue the practice of placing additional costs on contractors and recognize that ESA contractors must be competitive with wages and benefits paid to their workers, or risk attrition of a trained ESA workforce.
5. Treatment of carry over dollars and unspent dollars for ESA Main and ESA-related pilots	Rules regarding the treatment of these dollars are unclear and, at times, results in differing treatment and uses by individual IOU. Additionally, current requirements allow for unspent ESA dollars (at the conclusion of each annual period) to be returned to ratepayers or offset public purpose program surcharges. The practice of reallocating unspent ESA funds in this manner fails to hold IOUs accountable for effective administration of ESA and honoring service commitments to low-income customers in which the ESA funding in question was originally budgeted and intended for.	Develop standard requirements for ensuring the consistent treatment of carryover and unspent dollars allocated/budgeted for ESA and ESA-related pilots. Allow for flexibility for the energy division to approve requests for unspent funds in any ESA program category to be reappropriated to programs that are utilizing their current budgets. Prior to authorizing ~~Prohibit~~ unspent ESA dollars (at the conclusion of each annual period) to be returned to ratepayers or offset public purpose program surcharges, require IOUs to evaluate and present options to the CPUC for carrying forward unspent dollars to augment funding for ESA-related services and activities in the subsequent year. Only after IOUs have confirmed through this evaluation that no viable option for retaining use of unspent funds exist should funds be returned to ratepayers or offset public purposes program charges.~~.~~

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6. **ESA Reporting and Timeliness**	The current reporting paperwork reporting process does not expeditiously allow for detailed and program element(s) analysis. Program evaluation and revision processes must be more expeditious to influence a management model that is proactive and less reactive. Real time oversight and strategic management is based on data and information. The current reporting system requires much time and cost to identify program inefficiencies, problems and missed opportunities.	Develop a robust and real time ESA data dashboard to replace spreadsheet reporting. The Energy Division is doing a stellar job on the development of the CAS and should be tasked with developing the ESA data dashboard to ensure continued program improvements throughout the next program cycle.
7. **Maintain consistent eligibility verification standards for ESA, CARE, and FERA across all IOUs**	With efforts underway to implement the Concurrent Application System, a statewide online application platform enabling customers to apply for energy assistance programs administered by IOUs. Because ESA, CARE, and FERA will be part of this system, it is essential that eligibility requirements and verification be standardizes to ensure consistent treatment of all IOU customer applying for these programs – especially, those opting to do so using a single- entry application platform, like CAS. In addition, variance in eligibility requirements	Deny Southern California's Edison's proposal to require 100% upfront income verification for CARE participation and elimination of the school lunch program as a categorical eligible program.

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	makes it difficult to pursue single marketing and public messaging campaigns for CARE, ESA, and FERA benefiting all IOUs and their customers.	
8. Pursue data sharing strategies to simplify income eligibility and verification requirements for CARE, FERA, and ESA programs.	IOU applications propose a variety of different data sharing interests to improve the marketing of IOU administered energy programs to eligible customers and simplify the enrollment process into these programs. IOU efforts and interests with data sharing can be better guided if focused on a set of common objectives.	Propose that the CPUC create a framework to establish common data sharing objectives ~~for IOUs~~ with state ~~public~~ entities outside of IOUs and the CPUC ~~that administer programs that~~to verify income at or below the requirements of CARE, FERA and ESA, and ~~-~~to create a system that allows for low-income rate-payers to enroll into these programs without the added need for income verification by the IOUs or their contractors. Utilize the 2028 LINA study as a resource to build this framework and implement over the course of the next program cycle. Ensure the next cycle includes adequate funding and resources to achieve these goals. Objectives should focus on: 1) Pursuing data sharing to enhance outreach strategies, streamlined income eligibility and income verification for CARE, ESA, and FERA programs. 2) Devise targeted marketing, outreach and enrollment opportunities for rural areas, DACs, tribal areas, etc. for low-income ratepayers who may not be enrolled in public assistance programs

Commented [JW1]: I believe this is the edit Benito suggested during the most recent TAC meeting.

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		3) Simplify initial enrollment and eligibility renewal experiences for customers participating in CARE, FERA, and ESA programs through data sharing and other means 4) Allow low-income ratepayers to opt into CARE, FERA and/or ESA as part of their enrollment process for programs with the same or stricter eligibility requirements such as CalFresh, Medi-Cal, TANF/CalWORKS and others. 5) Ensure the next Decision includes flexibility to implement best practices at the conclusion of the 2028 LINA or when most appropriate as determined by the Commission
9. Incorporation of learnings from Deep Energy Savings Pilot, Pilot Plus and Pilot Deep into ESA	The Deep Energy Savings Pilot, Pilot Plus, and Pilot Deep provided the opportunity to test various methods to better address the energy needs of low-income IOU customers and to apply the learns from these pilots to evolve ESA offerings and services. IOU propose to incorporate learning from these pilots into ESA over the next program cycle.	First, all commissioned pilots must run their intended course and undergo a transparent and comprehensive evaluation to confirm pilot results. Evaluations shall consider administration practices and implementation structure as a consideration in their overall analysis. Only after completing this evaluation process should IOUs be able to act on and apply any learnings from these pilots to modify ESA.
10. New Technologies for ESA Measures	Technology moves fast and may be able to meet the goals of the ESA program faster than a program cycle allows. Balcony solar is an emerging	Allow for the Energy Division to have the administrative power to allow for new measures within the ESA program if there is clear evidence it will significantly reduce energy

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	technology that could soon help low-income Californians lower energy costs and reduce KW usage.	burden and/or improve the health, safety and comfort of low-income ratepayers.

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