

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

Application of Southern California Edison)
Company (U 338-E) for Approval of its 2012-)
2014 California Alternate Rates for Energy)
(CARE) and Energy Savings Assistance)
Programs and Budgets.) Application A.11-05-____

**APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) FOR
APPROVAL OF ITS CALIFORNIA ALTERNATE RATES FOR ENERGY (CARE),
ENERGY SAVINGS ASSISTANCE, AND COOL CENTER PROGRAM AND BUDGETS
FOR 2012-2014**

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Dated: **May 16, 2011**

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I.

INTRODUCTION

Pursuant to Rules 1 and 2 of the California Public Utilities Commission’s (Commission or CPUC) Rules of Practice and Procedure, and in accordance with the Commission’s directive set forth in the Assigned Commissioner’s Ruling and Guidance Document, dated March 30, 2011 in A.08-05-022, Southern California Edison Company (SCE) hereby respectfully files this Application and requests that the Commission approve its California Alternate Rates for Energy (CARE), Energy Savings Assistance Program, and Cool Center Programs and Budgets For 2012-2014 (Application).¹ The Assigned Commissioner’s Ruling directs the utilities to file its

¹ This Application is filed pursuant to and in compliance with A.08-05-022 et al., Assigned Commissioner’s Ruling Providing Guidance Concerning the California Alternate Rates for Energy (CARE) Program and Energy Savings Assistance Program (Formerly and Generally Referred to as Low Income Energy Efficiency (LIEE) Program) and Related 2012-2014 Budget Applications (Guidance Ruling), March 30, 2011.

Application for the 2012-2014 programs and budgets no later than May 16, 2011. This filing consists of the Application, Testimony in support of the Application (Exhibit SCE-1), and supporting Attachments required by the Guidance Ruling (Exhibit SCE-2). The supporting Testimony also describes SCE's proposed ratemaking treatment.

II.

SUMMARY OF SCE'S REQUESTS

In this Application, SCE requests Commission approval of SCE's proposals that will allow SCE to continue to effectively and efficiently administer the important Low-Income Assistance Programs, namely Energy Savings Assistance, CARE, and Cool Center programs.

First, SCE seeks approval of its CARE program plans and a proposed budget of \$16.438 million for the 2012-2014 cycle, the adoption of which will further the Commission's objective of increasing participation in this program by eligible customers. Second, SCE seeks approval of its Energy Savings Assistance Program plans and proposed budget of \$185.217 million for the 2012-2014 cycle. Adoption of SCE's proposed plans and budget will further the Commission's objective of ensuring the continuation of this important program. Third, in this Application, SCE seeks approval of its proposed Cool Center Program and proposed budget of \$2.311 million for the 2012-2014 cycle. Adoption of SCE's proposal will further the Commission's objective of providing energy efficiency assistance to the economically disadvantaged living in remote, hot, dry climates. Finally, SCE seeks approval to continue its current ratemaking treatment for these programs. SCE is not proposing any increase above the 2009-2011 amounts to fund its 2012-2014 program, therefore there should be no change to the existing customer rates.

III.

ORGANIZATION OF SCE'S TESTIMONY

SCE's Testimony submitted in support of the 2012-2014 Application, which has preliminarily been marked for identification as Exhibit SCE-1, comprises the following sections.

Section I is introductory in nature and simply discusses the context and background for this filing, along with a brief summary of SCE's requests.

Section II sets forth SCE's proposed Energy Savings Assistance Program. It includes an overview, history, goals, program description, budget and revenue requirement rate impacts.

In Section III, SCE provides details discussing SCE's estimates for CARE costs for the 2012-2014 CARE programs. It also discusses revenue requirement and rate impact.

In Section IV, SCE submits its proposal for the Cool Center Program for 2012-2014 and SCE's proposed budget for the 3-year cycle, including revenue requirement and rate impact.

IV.

EXECUTIVE SUMMARY

In this Application and supporting Testimony and Exhibits, SCE hereby seeks approval from the Commission for its Application for approval of its Low-Income Assistance Programs and Budgets for program years 2012-2014. These low-income assistance programs consist of the Energy Savings Assistance Program, the CARE Program, and the Cool Center Program.

It should be noted from the outset that SCE is not proposing to increase customer rates to fund *any* of its 2012-2014 low-income programs. SCE is committed to implementing the Commission's Programmatic Initiative so that all eligible and willing customers will receive every available cost effective measure without increasing rates to customers as our economy recovers.

For instance, SCE's 2012-2014 Energy Savings Assistance Program (formerly referred to as Low Income Energy Efficiency or LIEE), which is specifically designed to increase energy savings, improve program cost effectiveness, provide all eligible services to each participating household with greater efficiency and value, and educate customers about Edison SmartConnect-enabled benefits, will align with the new statewide Engage 360SM brand to build awareness and knowledge of the new Energy Savings Assistance Program among low-income customers. Among other things, SCE, in 2012-2014, will utilize improved communications technologies to

integrate messaging on Edison SmartConnect-enabled solutions into program materials as appropriate, and to send text messages that promote and educate customers on the Energy Savings Assistance Program.

With respect to CARE, in the 2009-2011 cycle, SCE's marketing efforts to newly eligible CARE customers caused CARE penetration (the ratio of enrolled households to estimated income-eligible households) to reach 98%. SCE will continue these efforts. Conversely, SCE is also proposing to implement a plan to verify the eligibility of current CARE customers to ensure that non-CARE ratepayers are not faced with higher bills and that CARE services are provided to those who need them most.

SCE's Cool Center Program will continue to provide services to communities located in extreme climate areas where few public facilities are available for use to offer relief from the heat during the hot summer months.

SCE specifically requests Commission approval of its 2012, 2013, and 2014 program budgets, plans and ratemaking for the Energy Savings Assistance Program, the CARE Program, and the Cool Center Program. The program specifics are set forth in detail in SCE's Testimony (Exhibit SCE-1).

V.

ENERGY SAVINGS ASSISTANCE PROGRAM

A. Overview

SCE describes the administrative activities and budget for SCE's 2012-2014 Energy Savings Assistance Program by expenditure category, as well as details concerning the program's plan and ratemaking treatment.

1. Summary

The 2012-2014 proposed Energy Savings Assistance Program is designed to reflect the goals of the California Long-Term Energy Efficiency Strategic Plan (Strategic Plan), namely: (1) to give all eligible customers the opportunity to participate in the

Energy Savings Assistance Program by 2020, and (2) to deliver increasingly cost-effective and longer-term savings through the Energy Savings Assistance Program.

With respect to the first goal -- achieving 100% participation -- SCE initially focused on developing a more effective outreach program using segmentation techniques to identify target groups within the low-income population. In order to serve additional households, SCE increased administrative and operational efficiency through the use of Voice Recognition Unit (VRU) and tablet PC technology. During the 2009-2011 cycle, SCE developed partnerships with community organizations and local governments to leverage existing services and tools.

As a result of those efforts, SCE is ahead of schedule in offering Energy Savings Assistance Program services to all income-eligible customers. Specifically, from January 1, 2009 through March 31, 2011, SCE treated a total of 208,415 homes. By the end of 2011, SCE projects that it will have treated an estimated 260,000 homes, i.e., 25% of all willing and eligible households with the Energy Savings Assistance Program. SCE's 2011 success combined with enhanced outreach methods and business practices places SCE in an excellent position to achieve the treated home goal established for the 2012-2014 budget period. Indeed, SCE anticipates it will treat another 25% of eligible homes during the 2012-2014 program period, achieving 50% of the Commission's Programmatic Initiative by December 2014.

As for the second goal of increasing cost-effectiveness and long-term savings, SCE will continue to offer comprehensive energy efficiency services with installation of long-term energy saving appliances such as evaporative coolers and refrigerators. In addition, the Energy Savings Assistance Program will be integrated with core energy efficiency programs to achieve economies of scale and other State, Federal and local programs will be leveraged to streamline and improve customer identification and program delivery. Overall, the Energy Savings Assistance Program is expected to deliver reliable resource benefits that extend well beyond the conclusion of the 2012-2014

program. Indeed, measures, including replacing inefficient refrigerators and central air conditioners are expected to produce long-term resource benefits to California for the better part of two decades.

In furtherance of both goals, because changing customer behavior is directly related to producing enduring and long-term energy savings, energy education plays a prominent role in SCE's 2012-2014 Application. Specifically, SCE is redesigning its Energy Savings Assistance Program energy education component to incorporate Edison SmartConnect-related information and services, and, with the advent of smart meters, SCE is encouraging all customer segments to actively engage in Edison SmartConnect-enabled benefits. SCE is also addressing relevant feedback garnered from the 2009-2011 studies.²

SCE plans to move customers through an ongoing engagement cycle of discovery, activation and participation. Customers will “discover” the Energy Savings Assistance Program through a combination of statewide awareness activities and local bundled marketing and outreach efforts. Targeted marketing campaigns will educate customers on the benefits of the Energy Savings Assistance Program and “activate” them to take action and enroll. Third party providers will then engage and evaluate customers as they install and deliver appropriate program measures; helping ensure that customers understand how to actively “participate” by becoming smart energy users and taking advantage of additional solutions. Information will be provided via numerous channels, including social media and new technologies, in multiple languages and in formats appropriate for customers with disabilities, such as the visually impaired.

² Those studies include: “California Low Income Energy Efficiency Program 2009-2010 Process Evaluation” conducted by Research Into Action for the CPUC (Draft Final Report issued March, 2011); “Low Income Energy Efficiency Program Household Segmentation Study” conducted by Hiner and Partners for SCE & PG&E (Preliminary Draft Report available March 2011); “High Usage Needs Assessment” conducted by Hiner and Partners for SCE (Preliminary Draft Report available March 2011). Detailed descriptions of each study as well as the types of studies anticipated in the latter category are provided in Exhibit SCE-2, Appendix A, Attachment A-9.

2. Utility Requests

SCE will continue to use a multi-faceted approach to deliver Energy Savings Assistance Program services to eligible customers. Different service delivery mechanisms are used to reach the specific population sectors. Data exchanges with other Investor Owned Utilities (IOUs) will result in lists of customers being verified as eligible for SCE's program, and will ensure that customers receive all eligible Energy Savings Assistance Program measures. Partnering with community groups, faith-based organizations (FBOs) and local governments have proven successful. By automating the current process to schedule and route appointments, contractors will be encouraged to utilize the program's database as their single reference tool for scheduling jobs. This will provide more visibility to customer appointments and improve customer service by allowing any one person speaking to the customer to respond to appointment inquiries.

Implementation of this tool will also offer SCE the ability to interface with smartphones to allow mobile work order management. This technology will result in faster response times and potentially reduce phone calls, paperwork and overhead costs.

SCE began use of tablet PC technology which offers the program's assessors the ability to access and validate information while on the go, making it easy to capture and use information wherever the job takes them. This will streamline the enrollment process for both the assessor and the customer as it will minimize duplicative and unsuccessful visits.

In 2010, SCE implemented the use of tablet PCs to enroll new customers into the Energy Savings Assistance Program. In addition, SCE is working with Southern California Gas Company (SoCalGas), to create a joint electronic enrollment form to streamline the enrollment process for both the customer and the contractors. The joint form will reduce the time to enroll customers. The assessor will enter the information once, and the data will be transferred to both utilities.

SCE is not proposing any pilots in 2012-2014, as noted below in Subsection H.

SCE is requesting authorization to conduct two Measurement & Evaluation (M&E) studies, to help inform current and future program design and implementation using information from past program assessments. The impact evaluation and energy education evaluation studies will be performed jointly among SCE, Pacific Gas & Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and SoCalGas.³

The impact evaluation will serve two key purposes: 1) evaluate the energy savings of the Energy Savings Assistance Program during 2012-2014, and 2) facilitate an increased understanding of how, what, and where energy savings measures can be delivered to generate maximum benefit and savings for future program development. Further details are outlined in Exhibit SCE-2, Appendix A, Attachment A-9.

The energy education evaluation will examine the current and potential value of the education provided to customers via the Energy Savings Assistance Program. Research findings from the 2009-2011 cycle⁴ suggest, the educational component of the Energy Savings Assistance Program has the capability to take on a more significant role by leveraging the potential of the smart meter-enabled technology. Further details are outlined in Exhibit SCE-2, Appendix A, Attachment A-9.

The power consumed by electronic devices while devices are in “standby” or “off” mode is referred to as “vampire load.” According to a 2008 technical brief conducted by the California Energy Commission’s Public Interest Energy Research (PIER) Program, vampire load accounts for roughly 4% of the total household electricity

³ Detailed descriptions of each study as well as the types of studies anticipated in the latter category are provided in Exhibit SCE-2, Appendix A, Attachment A-9.

⁴ “Impact Evaluation of the 2009 California Low Income Energy Efficiency Program” conducted by EcoNorthwest for the CPUC (Draft Final Report issued March, 2011); “California Low Income Energy Efficiency Program 2009-2010 Process Evaluation” conducted by Research Into Action for the CPUC (Draft Final Report issued March, 2011); “Low Income Energy Efficiency Program Household Segmentation Study” conducted by Hiner and Partners for SCE & PG&E (Preliminary Draft Report available March, 2011; Final report anticipated in June, 2011); “High Usage Needs Assessment” conducted by Hiner and Partners for SCE (Preliminary Draft Report available March, 2011; Final report anticipated in May, 2011).

used in California⁵. Vampire load can be eliminated if the user unplugs the device or turns the power source off when it is not in use. In most households, users typically leave electronic devices plugged into power sources (walls or power strips) and do not unplug the devices or turn the power off.

To help low-income customers reduce their energy consumption, SCE is proposing to replace or install power saving surge protectors. Power saving surge protectors are energy-saving power strips that can automatically eliminate vampire load of electronic peripheral devices when an electronic control device is in “standby” or “off” mode.

According to the 2008 survey, the percentage of households that can benefit from a power saving surge protector to address the vampire load of home entertainment centers is about 90%.

In 2009 – 2011, SCE had proposed to integrate and leverage the Energy Savings Assistance Program into the residential new construction energy efficiency program (California Advanced Homes Program). SCE’s effort to develop builder interest in this measure during 2009 – 2011 was unsuccessful, due in large part to changed economic conditions resulting in a significant decline of residential new construction in SCE’s service area. Due to the ongoing slowdown in residential construction, SCE does not propose to continue this initiative in the 2012 – 2014 cycle.

SCE intends to retire the central air conditioner (AC) service measure where Energy Savings Assistance Program contractors go back to maintain central ACs previously installed through the Energy Savings Assistance Program. This retirement will help limit program costs while still allowing for the continued replacement of the oldest, most inefficient central ACs with new units that exceed current code.

⁵ California Energy Commission’s Public Interest Energy Research Program Technical Brief, Energy Use of Household Electronics: Taming the Wild Growth, dated September, 2008.

<http://www.energy.ca.gov/2008publications/CEC-500-2008-064/CEC-500-2008-064-FS.PDF> [as of April 22, 2011].

SCE's budget has been developed to support the achievement of the Commission's Programmatic Initiative that all eligible customers will be given the opportunity to participate in the Energy Savings Assistance Program by 2020. SCE's 2009-2011 program will have treated 25% of homes identified to be treated by 2020. SCE proposes to treat another 25% of remaining homes in 2012-2014. SCE expect to have treated 50% of the Commission's Programmatic Initiative by December 2014. SCE also expects to treat 220,000 eligible homes over the 2012-2014 cycle with a three-year budget request of \$185.2 million. SCE projects expenditures of \$57.7 million in 2012, \$64.5 million in 2013, and \$63.0 million in 2014. SCE requests authorization to carry over any unspent Energy Savings Assistance Program funds from the 2009-2011 cycle to the 2012-2014 cycle. SCE presents a detailed budget in Exhibit SCE-2, Appendix A, Attachment A-1 and additional detail in the Testimony.⁶

SCE's Energy Savings Assistance Program is expected to provide 2012-2014 program cycle energy savings of 96.5 million kWh. The program is expected to produce lifecycle kWh savings of opportunity 1.2 billion kWh.

B. Background

1. Formation

The IOUs' Energy Savings Assistance Programs were developed in the early 1980s in response to growing concerns about the lack of equitable participation by low-income customers in utility conservation programs. Rebate incentives were available to customers purchasing and installing energy-efficient measures, but these same incentives were not accessible to low-income customers who could not afford the initial investment. The Commission directed IOUs to establish free weatherization programs for low-income customers that were funded through operating budgets.

⁶ See Exhibit SCE-1, Section II. J. at pp.83-87.

SCE’s Energy Savings Assistance Program objective is available to eligible low-income residential customers, whether homeowners or renters, living in all housing types to help them reduce their energy consumption and cost while increasing their comfort, health and safety. The program utilizes a “whole house” approach to provide free home weatherization, energy efficient appliances, the newest technology in light bulbs, and energy education services to income-qualified customers. SCE’s program also addresses the critical needs of customers residing in hot climates.

Over time, the IOUs’ Energy Savings Assistance Program evolved to achieve increasingly greater energy savings. Program services and measure offerings were standardized amongst the four IOUs, and statewide Energy Savings Assistance Program policies, procedures and installation standards were established. In addition, coordination amongst the IOUs increased, biennial impact evaluation studies were conducted and Energy Savings Assistance Program cost-effectiveness tests were developed to more accurately account for low-income program-specific criteria. Decision 05-10-044 expanded outreach efforts, simplified the enrollment process, expanded measures offered, and increased the income eligibility limits to 200% of the Federal Poverty Guidelines. Decision 07-12-051 established a three-year program planning cycle for 2009-2011,⁷ and directed that low-income energy efficiency programs be considered an integral element in the statewide energy efficiency strategic planning efforts.

On September 18, 2008, California’s first Strategic Plan, presented a roadmap to achieve maximum energy savings across all major groups and sectors in California and mandated that “[a]ll eligible low-income customers will be given the opportunity to participate in the low income energy efficiency program by 2020.”⁸

⁷ D.07-12-051, O.P. 1 & 3.

⁸ See California Long-Term Energy Efficiency Strategic Plan, January 2011 Update, http://www.cpuc.ca.gov/NR/rdonlyres/A54B59C2-D571-440D-9477-3363726F573A/0/CAEnergyEfficiencyStrategicPlan_Jan2011.pdf [as of April 27, 2011], p. 6.

In November 2008, in D.08-11-031, the Commission adopted the IOUs 2009-2011 Energy Savings Assistance Program plans and budgets, which increased the program budgets significantly for 2009-2011 to achieve 25% of the Commission's Programmatic Initiative by the end of 2011.

2. Eligibility

Eligibility for the Energy Savings Assistance Program is based on total household income. The total household income must be equal to or less than 200 percent of the Federal Poverty Guidelines. All household member income is considered, and customers enrolling in the program are required to provide documentation of income.

Customers may be eligible to participate under categorical eligibility and enroll in the Energy Savings Assistance Program based on their current participation in another local, state, or federal means-tested program as set forth by the Commission. Customers enrolling in the program through categorical eligibility are required to show documentation to reflect current participation in one of the categorical programs.

Customers may be eligible to participate in the Energy Savings Assistance Program through self certification. Program eligibility for self certification is described in the supporting Testimony². Those customers enrolling in the program through self certification must sign a "self certification statement" to certify that the household meets the current CARE/Energy Savings Assistance Program income guidelines as set forth by the Commission.

Customers may also be eligible to enroll in the Energy Savings Assistance Program if the customer has been income-qualified through the CARE program. In this case, the utility has verified that the customer is CARE-eligible within the past 12 months

² See Exhibit SCE-1, Section II. B. 2. at p. 18.

and, as such, CARE income verification may be used for participation in the Energy Savings Assistance Program.

3. Cycles and Current Cycle Objectives

The 2009-2020 interval consists of four three-year program cycles. The goal for 2009-2011 is to treat 25% of the homes requiring treatment. The 2012-2014 cycle consists of another three year cycle and another 25% to achieve the Commission's Programmatic Initiative.

SCE's plans for 2012-2014 are based on the the Commission's Programmatic Initiative for the Energy Savings Assistance Program adopted in D.07-12-051 and iterated in D.08-11-031 and the Commission's Strategic Plan:

By 2020, 100 percent of eligible and willing customers will have received all cost effective Low Income Energy Efficiency measures.¹⁰

SCE used the methodology described above to project a need to treat over 208,000 homes in 2012-2014 to remain on pace to meet the Commission's Programmatic Initiative. SCE plans to treat 220,000 homes through the Energy Savings Assistance Program during 2012-2014.

C. Program Goals

1. Strategic Plan Vision

In 2012-2014, SCE proposes to deliver all cost-effective Energy Savings Assistance Program measures. SCE is proposing to revise the 3-Measure Minimum Rule to allow installation of all cost-effective energy efficiency measures, including Compact Fluorescent Light (CFLs).

¹⁰ See California Long-Term Energy Efficiency Strategic Plan, January 2011 Update, http://www.cpuc.ca.gov/NR/rdonlyres/A54B59C2-D571-440D-9477-3363726F573A/0/CAEnergyEfficiencyStrategicPlan_Jan2011.pdf [as of April 27, 2011], p. 23.

2. Strategic Plan Goals

SCE is on track to provide 25% of the customers who have not participated in the program the opportunity to participate by December 2011 and projects to reach 50% of the non-participants identified in D.08-11-031¹¹ by 2014. SCE will have assessed, enrolled, provided energy education, and offered all feasible measures, to 50% of the remaining “feasible” population by 2014.

SCE’s Energy Savings Assistance Program is expected to provide 2012-2014 program cycle energy savings of 96.5 million kWh. The program is expected to produce lifecycle kWh savings of approximately 1.2 billion kWh. Many measures such as air conditioners and refrigerators provide durable energy savings.

3. Strategic Plan Strategies

To strengthen its Energy Savings Assistance Program marketing and outreach efforts, SCE plans to use social media tools along with the results from the SCE and PG&E jointly funded “Low-Income Energy Efficiency Program Household Segmentation Study”. The research identified eight key segments differentiated largely by usage, bill payment problems and some relevant demographic variables. The segmentation tool being developed by the research contractor will allow SCE to assign individual customers to the segments. This will enable SCE to develop targeted marketing and outreach efforts to specific issues and knowledge gaps. The segmentation tool would also enable SCE to better identify and target neighborhoods with high concentrations of customers in identified priority segments. The “Household Segmentation Study Results are discussed in the supporting Testimony.¹²

¹¹ D.08-11-031, p. 110.

¹² See Exhibit SCE-1, Section II. D. 2. c) at pp. 44-45.

To further strengthen Energy Savings Assistance Program marketing and outreach efforts, SCE plans to leverage Engage 360 social media activities, while exploring additional social media opportunities.

The Energy Savings Assistance Program name and logo was established in late 2010 and incorporated into marketing and outreach materials in 2011. Deployment of the name and logo in 2012-2014 is described in SCE's Testimony.¹³

SCE will partner with SoCalGas to create a joint electronic enrollment form to streamline the enrollment process for both the customer and the contractors. The joint form will reduce the time to enroll customers. The assessor will enter the information once, and the data will be transferred to both utilities.

The Strategic Plan has identified the need to assure that a trained workforce is available to meet the Commission's Programmatic Initiative of enrolling all eligible and willing households into the Energy Savings Assistance Programs.

SCE proposes adding additional training to its current suite of courses that will not only increase the effectiveness of service providers in providing Energy Savings Assistance Program services, but also provide skills that can create additional employment opportunities for employees working in the Energy Savings Assistance Program.

SCE proposes creating workshops to educate participants about the regulated electric industry, and how energy efficiency programs are structured within this environment, in order to enhance the energy education component of the program. SCE also proposes additional technical training related to the installation of services provided under the Energy Savings Assistance Program to ensure high-quality installations, which will maximize the energy savings generated through the Energy Savings Assistance Program. The Energy Education Centers offer a variety of workshops which include, but

¹³ See Exhibit SCE-1, Section II. D. 4. a) at pp. 49-52.

are not limited to, building envelope, construction, HVAC systems and technologies, lighting technologies, renewable energy and self-generation technologies.

SCE proposes to continue providing appliances to be installed under the Low Income Home Energy Assistance Program (LIHEAP). Under this approach, SCE pays for the cost of purchasing and delivering of the appliances to the LIHEAP provider who then install appliances to customers under the state-funded program to qualified low-income customers. SCE proposes to continue working with its procured contractors who are also LIHEAP providers to leverage services provided to low-income customers.

SCE is pursuing a number of strategies that will leverage the presence of SCE's demand-side portfolio, especially energy efficiency programs and customer assistance programs. The goal is to create greater awareness of the Energy Savings Assistance, CARE and FERA programs and provide additional benefits and greater participation by low-income customers in these complementary programs.

Through increased coordination among programs, SCE will reach a broader residential market containing low-income segments while reducing costs, and will be using Energy Efficiency and Demand Side Management (DSM)-specific messages to create a bridge to low-income programs. SCE has developed a cross-cutting approach to integrate and leverage low-income programs into Energy Efficiency and DSM programs. This approach will create additional energy savings by leveraging integration opportunities through inter-program referral and data sharing, and the bundling of DSM solutions across Energy Efficiency, Demand Response (DR), California Solar Initiative (CSI) and Advanced Metering Infrastructure.

As the Edison SmartConnect meters are deployed, SCE's low-income customers will have access to the full spectrum of Edison SmartConnect-enabled programs and services, including the Save Power Day Incentive Program,¹⁴ dynamic pricing (e.g.,

¹⁴ SCE's Save Power Day Incentive Program, formerly known as the Peak Time Rebate Program (PTR) is designed to encourage residential customers to reduce load by responding to price signals during Save Power
Continued on the next page

Summer Advantage Incentive),¹⁵ Budget Assistant,¹⁶ and next day presentment of interval usage data through SCE.com. SCE’s low-income customers are included in all existing Edison SmartConnect-related customer outreach and education, market research, and Smart Grid-related initiatives. These efforts will allow SCE to maximize the benefits of the Edison SmartConnect program for low-income customers.

SCE will provide measures that increase energy savings during the 2012-2014 cycle. SCE will continue to install/replace evaporative coolers in climate zones where customers can benefit from this low-cost alternative to refrigerated air conditioning. Based on preliminary results from the refrigerator degradation study,¹⁷ SCE proposes to expand refrigerator eligibility to include the replacement of units built through 1998. These units, when removed early will produce long and durable savings for SCE’s customers.

D. Program Delivery

1. Existing Strategies

SCE plans to continue to use current marketing, education and outreach (ME&O) activities to help customers move through the discovery, activation and participation engagement cycle. These activities include:

Continued from the previous page

Day events. Customers will earn bill credits of \$0.75/kWh during event hours, for load reductions achieved below their individual baseline. Customers who acquire and install qualifying enabling technologies (e.g., graphical information feedback displays) will earn bill credits of \$1.25/kWh during event hours for load reductions achieved below their individual baseline.

¹⁵ SCE’s Summer Advantage Incentive Program, formerly known as the Critical Peak Pricing Rate (CPP) is designed to encourage customers to reduce load by responding to price signals during Summer Advantage Incentive events. The Summer Advantage Incentive Program will be offered as an optional overlay to a customer’s rate for eligible rates. Charges are \$1.36/kWh, and offsetting reductions will be applied to non-event summer usage energy or demand charges, depending on the underlying rate structure.

¹⁶ Budget Assistant will provide customers with proactive notifications regarding costs within their current billing period. Enrolled customers will receive routine ‘performance notifications’ as to how they are progressing toward a monthly spending target that they select. Customers can select to receive the notifications through one of three communication channels (voice, email, text message).

¹⁷ “LIEE Refrigerator Replacement Energy Consumption,” memo prepared by KEMA for Phase 1 of the Refrigerator Degradation Effective Useful Life Study (May, 2011).

- **Outreach and Events:** SCE plans to continue to leverage outreach and event opportunities to distribute promotional and educational materials to single family homeowners/renters, multi-family complexes and mobile home parks. SCE will also partner with local governments (cities, counties), CBOs, FBOs, retail outlets, and relevant non-profit organizations to reach customers. To reach customers with special needs and disabilities, SCE will continue to leverage established alliances with various hospitals, disability resource centers, social service agencies, and other CBOs, to increase SCE program awareness and provide enrollment assistance in SCE programs and services.

- **Bill Inserts and Direct Mail:** SCE plans to continue to target low-income communities that can most benefit from the Energy Savings Assistance Program. Historically, SCE's direct mailers have proven successful. Preliminary market research findings suggest that customers appreciate direct-to-consumer communications, including mailers and bill inserts or inserts, because it is helpful to have a tangible point of reference.

- **Outbound Calling Campaigns:** Continuing with the most cost-effective marketing and outreach approach from the 2009-2011 cycle, SCE will expand its use of automated outbound calling campaigns in the 2012-2014 cycle. These automated outbound calling campaigns target specific customers in geographical neighborhoods, and serve as customer surveys through asking a variety of relevant questions.

In 2010, SCE launched a successful Direct Connect campaign. SCE proposes to continue and expand the Direct Connect campaign in the 2012-2014 cycle. During the calls, the Direct Connect feature allows customers to be directly connected to service provider representatives for immediate program enrollment assistance, which provides the customer with confidence that the SCE-assigned contractor is legitimate.

SCE's contractors, particularly CBOs, are situated in low-income and disadvantaged communities and provide jobs within these communities. Currently, the service providers' participation in the program has generated over 1,100 jobs that support

the Energy Savings Assistance Program. SCE has expanded training to its contractors and participation in statewide efforts to ensure a well-trained workforce capable of meeting the expanded demand for trained workers in green job related industries.

SCE's Energy Savings Assistance Program continues to provide training to contractors, CBOs and vendors working in the program. This includes training related to the policies and procedures for home assessment, service delivery and inspections. In addition, training workshops are conducted in the use of EMAPS, the web-based database used to process and track program activity.

SCE coordinates with SoCalGas to ensure that the program training curricula for the respective utilities are in alignment whenever possible. In addition, SCE schedules its training workshops to coincide with SoCalGas workshops, whenever feasible, consequently allowing trainees to receive complete instruction related to both utilities' respective policies, procedures and offerings, which makes it easier for qualifying customers to receive all the services for which they are eligible.

SCE has developed a cross-cutting approach to integrating and leveraging low-income programs, including CARE and FERA, into other DSM programs. This approach creates additional opportunities to enroll customers in the CARE/FERA programs by leveraging integration opportunities through inter-program referral and data sharing, and the bundling of CARE/FERA across other DSM programs. Further, this cross-cutting approach allows SCE to take advantage of the broader "residential customer" messaging being communicated service area-wide.

SCE continually works with its network of Energy Savings Assistance Program service providers to optimize service delivery by maximizing the effectiveness of existing resources to reach low-income homes and offer customers the opportunity to participate in the program. SCE's CARE program has enrolled over one million households who have self-certified as being income eligible (for CARE and the Energy Savings Assistance Program), and the majority of those existing CARE customers have not

applied for the Energy Savings Assistance Program. Therefore, the Energy Savings Assistance Program will continue to use the CARE customer list when identifying and selecting customers as the basis for most of its targeted marketing efforts.

2. Incorporating Evaluation and Study Results

Six studies were conducted for the 2009 to 2011 cycle. These include: (1) an impact evaluation, (2) a process evaluation, (3) a study of NEBs, (3) a study of refrigerator degradation, (5) a PG&E/SCE Energy Savings Assistance Program household segmentation study, and (6) an SCE Energy Savings Assistance Program high-usage needs assessment study. An overview of the results of each of these six studies is described below and in the supporting Testimony.¹⁸ To the extent possible, SCE is incorporating relevant findings throughout its Application.

a) Process Evaluation Study Results

The purpose of the study¹⁹ is to evaluate the effectiveness of the program delivery strategies and provide recommendations for improvement. Although the final study report is not yet available, a draft report was delivered on February 25, 2011, and a workshop was held on March 28, 2011 to discuss the results.

b) Impact Evaluation Study Results

The statewide impact evaluation²⁰ commenced with a kickoff meeting for all interested parties in September of 2009. A draft final report was delivered in March 2011 and a public workshop was held on March 28, 2011 to discuss the results. The report and results are not yet final. The objective of the impact

¹⁸ See Exhibit SCE-1, Section II. D. 2. at pp. 41-48.

¹⁹ “California Low Income Energy Efficiency Program 2009-2010 Process Evaluation” conducted by Research Into Action for the CPUC (Draft Final Report issued March, 2011).

²⁰ “Impact Evaluation of the 2009 California Low Income Energy Efficiency Program” conducted by EcoNorthwest for the CPUC (Draft Final Report issued March, 2011).

evaluation was to provide electric and gas savings estimates by measure, utility, household, climate zone, and other relevant dimensions for the 2009 Energy Savings Assistance Program. The impact results reported in the draft final report are being utilized and incorporated as per the direction of Energy Division.

c) Household Segmentation Study Results

The Household Segmentation Study²¹ is a joint study between SCE and PG&E. SCE managed the project and while the final report has not been issued, a draft final report and preliminary data on SCE's portion of the study have been provided and are being incorporated into this Application. In particular, the results of the study will improve the effectiveness of program delivery with more streamlined targeting and outreach methods. Likewise, more refined marketing and educational materials that are tailored to the needs and issues of various customer segments are likely to increase customer interest in participating in the program once they have been identified.

SCE recognizes that once the final results of this study are available and the targeting tool is operational, these results will continue to inform and improve SCE program delivery efforts.

d) High Usage Needs Assessment Study Results

SCE is the only utility participating in the High Usage Needs Assessment Study.²² The overall purpose of the study was to better understand high-tier energy use among low-income customers in temperate climate zones. It was anticipated that understanding the causes or behaviors that lead to high usage

²¹ "Low Income Energy Efficiency Program Household Segmentation Study" conducted by Hiner and Partners for SCE & PG&E (Preliminary Draft Report available March 2011; Final report anticipated in June 2011).

²² "High Usage Needs Assessment" conducted by Hiner and Partners for SCE (Preliminary Draft Report available March 2011).

among customers in mild climate zones can assist the program in better serving the unique needs of these customers, including specified approaches to ME&O.

As is the case with the Household Segmentation Study, results from the draft report and preliminary findings are incorporated into this Application. For example, the findings suggest that behavioral and household-specific characteristics contribute to high usage more than climate. With this in mind, the program marketing, education and measure delivery can be tailored to address knowledge and information gaps and/or other relevant barriers and challenges faced by high usage customers regardless of where they live.

e) **Refrigerator Degradation Study Results**

Typically, early replacement of appliances is based on the remaining useful life and degradation of efficiency performance of the measure. These factors help in determining at what stage of their performance lifecycle it becomes cost-effective to replace them to receive the most energy savings benefits. Given that the energy efficient refrigerator measure is still one of the most cost-effective, energy-saving measures in the Energy Savings Assistance Program, the utilities needed information on the most cost-effective year of manufacture threshold or age threshold that would satisfy the program budget. This study²³ was planned to update refrigerator replacement criteria to garner new, significant and cost-effective energy savings for the Energy Savings Assistance Program. KEMA is conducting the research, and PG&E will manage the study. The study is expected to be completed in 2011. The first phase of the study shows that pre-1999 refrigerator replacements save about 524 kWh, which is a significant amount of energy savings forgone if the program were to adhere to a pre-1993 standard.

²³ “LIEE Refrigerator Replacement Energy Consumption,” memo prepared by KEMA for Phase 1 of the Refrigerator Degradation Effective Useful Life Study (May, 2011).

SCE is proposing to change the replacement criteria to include refrigerators manufactured prior to 1999 for the 2012-2014 Energy Savings Assistance Program.

f) Non Energy Benefits Study Results

The prime research contractor for the NEBs study²⁴ was Skumatz Economic Research Associates. A statewide advisory group selected the contractor and SDG&E managed the study.

The purpose of the study was to research the available literature on NEBs and provide a recommended methodology for updating the current NEB values used for testing the cost effectiveness of the Energy Savings Assistance Program. The work scope consisted of an extensive literature review and synopsis of relevant ranges of values used in other programs. The results of the study showed that the current NEB values used by the utilities for the most part fall within the range of values reported from other programs. Initially, a Phase Two study had been planned to conduct further analysis; however, it was decided by the statewide advisory group that the results of this “Phase One” showed that values were for the most part consistent with other programs.

3. Incorporating Experiences from 2009-2011 Implementation

SCE has been successful at incorporating best practices, as well as overcoming challenges and obstacles experienced during the 2009-2011 program cycle. These include:

²⁴ “Non-Energy Benefits: Status, Findings, Next Steps, and Implications for Low Income Program Analyses in California” conducted by Skumatz Economic Research Associates (SERA) (Final Report available May 2010).

- In order to achieve 25% of the Commission’s Programmatic Initiative SCE expanded its existing network of CBOs. The workforce of these organizations increased from 450 employees to approximately 1,100 employees in 2010.
- In Decision 08-11-031, the Commission adopted a neighborhood approach that focused on canvassing neighborhoods²⁵. SCE developed several tools incorporating certain aspects of lead assignment effective schedule delivery, and appliance installation.
- SCE integrated and coordinated with other programs to use external funding sources to help weatherize homes.
- In Decision 08-11-031, the Commission authorized allowing for 5% of low-income-eligible customers as unwilling or unable to participate in the program²⁶. SCE’s tracking data revealed as many as 24% of customers are unwilling or unable to participate. Additional workforce and education training, along with new marketing efforts may help reduce this percentage.

Many challenges that were experienced during 2009-2011 were policy-related.

New policy directions resulted in program changes requiring revisions to procedures, additional contractor training, and clarification from the Commission.

- Contractor ramp-up to address expanded goals on the Whole Neighborhood Approach (WNA); and
- Existing Energy Savings Assistance Program workforce was involved with state funded activities such as LIHEAP, Department of Energy (DOE), and ARRA.

Looking ahead SCE will continue to use similar and enhanced outreach methods to achieve the treated home goal established for the 2012-2014 budget period.

²⁵ D.08-11-031, p. 4.

²⁶ D.08-11-031, p. 110.

4. New and Proposed Strategies

a) New ME&O efforts to be employed, including the integration of the new low-income brand as well as the new energy efficiency brand.

To engage SCE's diverse low-income customer base to actively participate in the Energy Savings Assistance Program, SCE plans to move customers through the continual engagement cycle of discovery, activation, and participation.

To help customers become smarter energy users and move them through the continuous engagement cycle, SCE plans to implement the following ME&O strategies and efforts during 2012-2014:

- **Leverage Engage 360** – Build awareness and knowledge of the new Energy Savings Assistance Program brand among targeted low-income groups on a statewide level in conjunction with Engage 360.
- **Incorporate the Energy Savings Assistance Program Name and Logo** – Continue to include the Energy Savings Assistance Program name and logo on SCE ME&O materials targeting low-income customers.
- **Integrate Messaging on Edison SmartConnect™ Enabled Solutions (i.e., Budget Assistant and Save Power Day Incentive Program) into Program Materials, as Appropriate** – SCE intends to include information on Edison SmartConnect-enabled solutions within its ME&O material and will streamline the enrollment process by integrating DR programs and dynamic pricing rates into bundled solutions packages.
- **Utilize Text (Mobile) Messaging** – Customers who opt-in to receive mobile or text messaging will receive tips, alerts, promotional opportunities, and other information that will help them take action to better manage their energy usage.

- **Expand Outreach Opportunities to Customers with Special Needs and Disabilities** – SCE plans to conduct an annual Resource Fair, in which the Energy Savings Assistance Program, CARE and other appropriate solutions are shared with customers including in developing outreach activities to further extend its reach to customers with special needs and disabilities.
- **Conduct Joint Marketing with SoCalGas** – SCE and SoCalGas will explore joint marketing and outreach efforts for the Energy Savings Assistance Program in their overlapping service territories.
- **Create customized marketing collateral for use with targeted customers** – During 2012-2014, SCE plans to utilize different messages and materials depending on what might resonate best with the particular target customer.

b) Engage 360 and the Energy Savings Assistance Program name will be used in program marketing.

SCE plans to include the Engage 360 brand together with Energy Savings Assistance Program name and logo on ME&O materials targeting low-income customers.

c) New WE&T strategies for 2012-2014

SCE is working directly to provide expanded training to its CBO contractors and to participate in statewide efforts to ensure a well-trained workforce capable of meeting the expanded demand for trained workers in green job-related industries.

SCE proposes adding additional training to its current suite of courses that will provide skills that can create additional employment opportunities for employees working in the Energy Savings Assistance Program.

The energy education component assists customers in learning about the costs of energy, the benefits of energy conservation and measures and highlights

the importance of energy and appliance safety. When delivered effectively, energy education empowers customers to use the program services being received in a more efficient manner and serves as a permanent resource for customers in managing their respective energy needs and costs.

The Household Segmentation and High Usage Needs Assessment Studies identified specific segments of customers who tended to exhibit more bill payment issues. In response to this, the energy education packet will be modified during the 2012-2014 program years to include information about SCE's Budget Assistant, which helps customers stay on budget.

The statewide Process Evaluation evaluated the effectiveness of the program delivery strategies and provided recommendations for improvement. The draft report highlighted the need for the program to increase the attention paid to efforts to educate customers about energy efficiency services, programs, as well as energy savings practices and behavior changes that could benefit customers.

Also, SCE plans to reinforce aspects of energy education that direct customers to other resources for assistance with these types of health and safety issues including other IOU programs or federally funded programs such as LIHEAP.

d) New leveraging opportunities, strategies and relationships for 2012-2014

SCE has been coordinating enrollment activities with SoCalGas for over ten years. A similar approach has been coordinated between SCE and Southwest Gas, and SCE will also continue to share information with PG&E for the small number of customers in their shared service territory.

SCE has existing partnerships in place with external organizations and businesses and will look to establishing new partnerships and providing complementary services to customers that will further the reach of the Energy Savings Assistance Program.

e) **New integration opportunities and strategies for 2012-2014**

During the 2012-2014 program cycle SCE will continue existing integration efforts and will attempt to improve and expand on these efforts. At the center of this expansion will be aligning the Energy Savings Assistance Program with Integrated Demand Side Management (IDSMS) efforts. More specifically, SCE wants to ensure that low-income customers are informed and engaged in understanding the workings and benefits of DSM programs and services.

f) **Multi-family Buildings**

(1) **Background**

Historically, owners and managers of multi-family properties have been less responsive to energy efficiency efforts than other residential customers. As one of California's largest segments, this unique market warrants additional attention and effort needed to motivate property owners and managers to actively participate in energy efficiency programs. Energy efficiency efforts for this segment must deal with both owners/managers of multi-family buildings and with tenants.

A significant challenge to overcome is that the Energy Savings Assistance Program is targeted at the low-income household, and not at the building. The goal of this program is to leverage the various programs and channels of outreach to the low-income multi-family retrofit sector to further break down the barriers of participation.

(2) Integrated Approach

In accordance with the Strategic Plan, the Energy Savings Assistance Program will leverage and integrate core energy efficiency Programs and the planned Energy Upgrade California (EUCA) in order to gain increased access to Energy Savings Assistance Program customers through the multi-family market. This coordinated approach will advance comprehensive energy saving strategies for this customer segment.

The desired outcome of integrating core energy efficiency Program offerings with the Energy Savings Assistance Program offerings is to realize long-term energy savings through the installation of energy-efficient products in not only dwelling units, but also common area locations.

(3) Energy Upgrade California Whole Building Performance Program

For those multi-family building owners who are willing to invest and are ready to take a comprehensive performance-based whole-building approach, the EUCA program will offer incentives to motivate and influence the implementation of a series of comprehensive measures designed to address systems within their multi-family building(s) which will result in achieving maximum energy efficiency savings.

The EUCA will be designed to complement the existing multi-family energy efficiency program rather than create competing offerings. The program design will utilize a contractor delivery model for individual measure programs and utilize a rater/verifier and energy consultant delivery model for whole-building performance programs, while taking

into account the conditions under which a contractor-delivery approach may be appropriate for whole-building performance programs.

In 2012-2014, SCE will focus on delivering this model to a specific subset of multi-family properties located within both the SCE and SoCalGas service areas to ensure the most comprehensive series of measures can be provided. The integration of the Energy Savings Assistance Program with core energy efficient programs will strive to meet program activity targets.

(4) Consumer Affairs

SCE's Consumer Affairs organization provides information and education about programs and services that benefit special needs customers. Special needs customers include critical care, elderly (seniors), and customers with disabilities. Consumer Affairs has established alliances with various hospitals, disability resource centers, and other CBOs that work directly with this customer base, to increase SCE program awareness and provide enrollment assistance in SCE programs and services. In addition, alliances have been established with social service agencies administering programs and services assisting the special needs population.

(5) SCE Community Forums

SCE's community forums are an opportunity for communities to connect with representatives from SCE to learn about the various programs and services offered for the customers. Specifically, the forums bring together leaders of nonprofits from the African American, Asian Pacific Islander, Latino, and Native American communities to learn about energy efficiency, income-qualified rates, Edison SmartConnect meters,

grants, sponsorships, safety, volunteerism and how SCE is here to help their communities succeed "beyond the dollars."

E. Cost Effectiveness & Energy Savings

1. Energy Savings

SCE's Energy Savings Assistance Program is expected to provide 2012-2014 program cycle savings of 96.5 million kWh. The program is expected to produce lifecycle kWh savings of approximately 1.2 billion kWh. The portfolio is balanced with some measures, including refrigerators providing extremely durable savings. Other measures, though less cost effective, address important health, safety, and comfort concerns, particularly for customers living in hot climates where energy intensive cooling measures are essential.

2. Cost Effectiveness of Overall Energy Savings Assistance Program

The overall program benefit/cost ratio and cost-effectiveness uses the Utility Cost Test and Modified Participant Cost Test.

a) Benefit/Cost Ratio of Program

As the Commission directed, SCE reviewed the cost-effectiveness of the proposed Energy Savings Assistance Program. The details of SCE's cost-effectiveness analyses are provided in Exhibit SCE-2, Appendix A, Attachments A-5, A-6 and A-7. SCE performed the work according to the Commission's instructions, using the two cost tests previously adopted for the Energy Savings Assistance Program: the Utility Cost Test (UCT) and the Modified Participant Cost Test (PC_m), and identifying the benefit/cost ratio for each measure/program.

b) **Energy Savings Assistance Cost-Effectiveness Tests: Background and Methodology**

A study to update the NEBs used in the two cost effectiveness tests was authorized in D.08-11-031²⁷. Research was performed by SERA in 2010-2011 for SDG&E, SoCalGas, PG&E, and SCE, with Energy Division guidance. As a result of this study, specific NEBs were updated in the cost effectiveness tests used for this 2012-2014 Application.

c) **Cost-Effectiveness Testing for the 2012-2014 Energy Savings Assistance Program**

For the 2012-2014 program cycle, the Commission instructed the utilities to provide program level and measure level benefit cost ratios using the UCT, the PC_m, and the TRC tests.²⁸

The PC_m Test was conducted using the methodology approved by the Commission for the PY2003 evaluation.

The TRC test was conducted using the E3 Calculators for the Energy Savings Assistance Program for the 2012-2014 program cycle. The Calculator provides program level results and measure-specific results with administration costs allocated based on the energy savings of the measure. The TRC test does not include NEBs, so in this respect it is not comparable to the results of the PC_m Test and the UCT.

²⁷ D.08-11-031, p. 159

²⁸ Assigned Commissioner's Ruling Providing Guidance Concerning the California Alternative Rates for Energy (CARE) Program and Energy Savings Assistance Program (Formerly and Generally Referred to as Low Income Energy Efficiency (LIEE) Program) and Related 2012-2014 Budget Applications; Rulemaking 07-01-042, March 30, 2011.

F. Measure Portfolio Composition

1. Overall Portfolio Composition

For 2012-2014, SCE proposes a balanced and comprehensive series of measures that provide bill savings and comfort to eligible low-income customers. Eligible measures include, but are not limited to, refrigerators and lighting for all qualifying customers, while simultaneously addressing important demand reduction, health, comfort and safety by continuing to replace air conditioners and installing evaporative coolers.

a) Cost Effectiveness and Other Criteria for Program Measures

(1) Criteria used to compose the portfolio

SCE has considered various criteria to select measures for the 2012 – 2014 cycle. Consistent with the Strategic Plan, SCE has selected measures to ensure the Energy Savings Assistance Program will be an energy resource delivering increasingly cost-effective and longer-term savings. SCE recognizes that a longstanding objective of the Energy Savings Assistance Program has been to promote health, safety, and comfort in program delivery. The measures within SCE’s Energy Savings Assistance Program serve complementary objectives that have long been mainstays of the Energy Savings Assistance Program.

2. How the portfolio composition results in improved cost-effectiveness

SCE’s portfolio of measures has been adjusted to improve cost effectiveness by adding variable-speed pool pumps and power saving surge protectors to the program.

3. **Each measure included in the portfolio achieves the dual objectives of maximizing long-term and enduring energy savings and enhancing the participants' quality of life**

SCE's portfolio achieves the dual objectives of maximizing long-term and enduring energy savings and enhancing the participants' quality of life. As an electric utility encompassing over 50,000 square miles in a service territory that contains a desert region twice the size of the other IOUs, SCE is challenged to provide assistance to low-income customers living in hot weather communities and operating inefficient air-conditioners. In SCE's desert communities, finding relief from the heat is essential to health, safety, and comfort, particularly for seniors and customers with disabilities.

4. **How each measure included in the portfolio passes or fails the current cost effectiveness criteria as per D.08-11-031**

The Commission established explicit cost effectiveness criteria in D.08-11-031 for inclusion of measures in the Energy Savings Assistance Program²⁹. Measures with both a PC_m and a UCT benefit-cost ratio greater than or equal to 0.25 (taking into consideration the housing type and climate zone for that measure) must be included in the Energy Savings Assistance Program. This rule applies for both existing and new measures. Existing measures that have either a PC_m or a UCT benefit-cost ratio less than 0.25 shall be retained in the program.

Existing and new measures with both PC_m and UCT test results less than 0.25 for that utility may be included in the Energy Savings Assistance Program for all climate zones if they consist of furnace repair and replacement or water heater repair and replacement. Air conditioning and evaporative cooling measures may be included in the Energy Savings Assistance Program in hot climates. The measures in SCE's 2012-2014

²⁹ D.08-11-031, O.P. 17.

Energy Savings Assistance Program comply with the Commission's cost effectiveness directive in D.08-11-031. The program and measure level cost effectiveness results are provided in Exhibit SCE-2, Appendix A, Attachments A-5, A-6 and A-7.

5. Provide justification for any measures included in the portfolio that do not meet the current criteria of cost effectiveness but serve other important policy objectives

SCE's 2012-2014 measures all comply with the Commission's current cost effectiveness criteria.

a) New Measures

SCE proposes adding power saving surge protectors to the program. These devices are inexpensive to purchase, especially in bulk, simple to install, and require no approval of landlords, who often choose not to approve any changes to their property.

b) Retired Measures

SCE in 2009 – 2011 had proposed to integrate the Energy Savings Assistance Program into the California Advanced Homes Program. SCE's effort to develop builder interest in this effort during 2009 – 2011 was unsuccessful, due in large part to changed economic conditions in SCE's service area. Due to the ongoing slowdown in residential construction, SCE does not propose to continue this initiative in 2012 – 2014.

G. Other Energy Savings Assistance Program Elements and Policies

1. Existing policies that should be reiterated and continued, retired, or modified in the 2012-2014 cycle

a) Utility Gas/Electric Budget Split (If applicable) - Continued

As an electric utility, this budget split does not apply to SCE.

b) Joint Utility Funding Split for Joint Projects - Continued

The joint IOUs recommend retaining the SCE 30% - PG&E 30% - SoCalGas 25% - SDG&E 15% split.

c) 3-Measure Minimum

SCE provides a comprehensive set of measures to customers throughout its service area. The 3-Measure Minimum Rule initially was developed to ensure a minimum number of weatherization related measures were installed.³⁰ The exception was made in the manual because CFLs are highly cost effective and quick to install. SCE proposes that the Commission revert to the 3-Measure Minimum CFL policy that was in effect prior to 2009. SCE's request is consistent with California Public Utilities Code Section 2790(b)(2) which states, "The commission shall direct any electrical or gas corporation to provide as many of these measures as are feasible for each eligible low-income dwelling unit."³¹ CFLs continue to be highly cost effective and feasible in nearly all cases. SCE

³⁰ D.01-03-028, page 19, "We agree with the utilities that the provision for not treating customers needing very few measures is necessary to maintain reasonable cost-effectiveness and will allow dollars to be spent on homes that have not yet received weatherization services."

³¹ Public Utilities Code 2790(c) continues to read: "Weatherization" may also include other building conservation measures, energy-efficient appliances, and energy education programs determined by the commission to be feasible, taking into consideration for all measures both the cost-effectiveness of the measures as a whole and the policy of reducing energy-related hardships facing low-income households."

believes customer expectations and enthusiasm for the Energy Savings Assistance Program can be raised to help build positive brand awareness by returning to the prior policy on CFL installations.

d) Proposed Definition of Treated Home and Infeasible Home

After completing the assessment for feasible measures, if homes do not meet feasibility criteria for refrigerators and are not in need of gas related measures, SCE is not able to install CFLs due to the 3 measure minimum savings rule. Many of these homes that do not meet feasibility criteria for the installation of any measures have been treated by virtue of having received in-home energy education at the time of enrollment according to Commission policy.³² SCE believes that the number of homes meeting these criteria in temperate climate zones is substantial. Customers in Treated Homes and Infeasible Homes have been given the opportunity to participate in the Energy Savings Assistance Program and represent progress toward achieving the Commission's Programmatic Initiative.

e) Refrigerator Replacement Age

SCE is proposing to expand the replacement of refrigerators to units manufactured from 1993 through 1998 with ENERGY STAR®-qualified units. SCE will continue to recycle the used refrigerators and recycle or dispose of hazardous materials in accordance with federal and state standards. To minimize costs, refrigerators are purchased in bulk and inventory is shipped directly to service providers who deliver program services to customers. SCE's analysis

³² D.08-11-031, page 203, "We clarify that the education that occurs as part of LIEE enrollment, audit and household visits to install measures may continue as in the past."

indicates the 1993 through 1998 refrigerators produce significant energy savings and meet program cost effectiveness criteria.

f) Cooling Center Budgets - NA

SCE is not requesting Cool Center funding as part of the Energy Savings Assistance Program budget. SCE is requesting Cool Center funding for 2012-2014 in a separate part of this Application.

g) Other – Mid Cycle Program Adjustments

SCE recognizes that over a three-year period, it may be desirable to adjust SCE's proposed measure mix to include new measures, delete existing measures, or revise eligibility criteria within specific climate zones or dwelling types. SCE requests authorization to propose adjustments to program measures or criteria within the authorized budget that is adopted by the Commission for the Energy Savings Assistance Program in 2012-2014. SCE requests authorization to propose such adjustments through an Advice Letter filing that would be submitted to the Commission for approval prior to implementing the requested changes.

2. The Commission should develop a policy document that captures all Energy Savings Assistance Program policy

The Commission over the past dozen years has issued increasingly complex policy guidance as the Energy Savings Assistance Program has evolved. This policy is embedded in Decisions and Resolutions going back more than 10 years. SCE requests the Commission direct the utilities to work with Energy Division to develop a policy document that would incorporate all active policy guidance that will be in place during 2012-2014. Once the document has been submitted to the Commission, its adoption will consolidate Commission policy in a manner that will provide clarity to all stakeholders.

H. Pilots

SCE does not plan on implementing specific low-income pilots in the 2012-2014 program cycle.

I. Studies

SCE is requesting authorization to conduct two M&E studies to help inform current program and future program design and implementation using information from past program assessments. These studies will be performed jointly among SCE, PG&E, SDG&E, and SoCalGas. Detailed descriptions of each study as well as the types of studies anticipated in the latter category are provided in Exhibit SCE-2, Appendix A, Attachment A-9.

1. Impact Evaluation

The Impact Evaluation will serve two key purposes: a) estimate the energy savings accomplishments of the Energy Savings Assistance Program during the 2012-2014 cycle, and b) facilitate the understanding of how, what, and where energy savings measure can be delivered to generate maximum benefit and savings for future program development. Dimensions such as climate zones, utility, housing type and other variables will be included to determine accurate savings estimates that can be used in preparing the 2015-2017 budget applications. The evaluation will develop and utilize a methodology that will produce reliable estimates for the program and its component measures. Further details are outlined in Exhibit SCE-2, Appendix A, Attachment A-9.

2. Energy Education and Assessment Study

The Joint Utilities propose a systematic examination of our energy education component of the Energy Savings Assistance Program in order to examine the current and potential value of the education provided to customers via the Energy Savings

Assistance Program. Research findings from the 2009-2011 cycle³³ suggest we can increase the benefit of our customer education and produce additional meaningful savings benefits for our low-income customers. The proposed research will incorporate Edison SmartConnect-related information as well as other identified customer needs or gaps in knowledge that would enable customers to proactively manage household activities and behaviors. This research project also supports National and Statewide strategic initiatives which have become increasingly directed towards inciting long term behavior and attitude changes in customers to reach long-term greenhouse gas goals. Further details are outlined in Exhibit SCE-2, Appendix A, Attachment A-9.

3. Funding of Proposed Studies

SCE requests three-year total funding for the above studies related to the 2012-2014 Energy Savings Assistance Programs as shown in Table V-1 below:

***Table V-1
Measurement & Evaluation of Energy Savings Assistance Program – SCE***

Statewide Studies	Total Cost	SCE Share	SCE Cost
Impact Evaluation	\$600,000	30%	\$180,000
Energy Education and Assessment	\$300,000	30%	\$90,000
Total	\$900,000	30%	270,000

³³ “Impact Evaluation of the 2009 California Low Income Energy Efficiency Program” conducted by EcoNorthwest for the CPUC (Draft Final Report issued March, 2011); “California Low Income Energy Efficiency Program 2009-2010 Process Evaluation” conducted by Research Into Action for the CPUC (Draft Final Report issued March,2011), “Low Income Energy Efficiency Program Segmentation Study” conducted by Hiner and Partners for SCE & PG&E (Preliminary Draft Report available March 2011) High Usage Needs Assessment ” conducted by Hiner and Partners for SCE (Preliminary Draft Report available March 2011).

J. Budget

1. Specific strategies and programs for accomplishing the Energy Savings Assistance Programmatic Initiative.

For 2012 to 2014, SCE's budget is designed to target specific segments to receive Energy Savings Assistance Program services. In particular, SCE's budget is driven according to where customers are located – mild climate zones or extreme climate zones, SCE will be directing approximately 2/3 of its budget resources to customers in extreme climate zones.

2. Program categories and specific subcategories

SCE's budget has been developed according to the following program categories (specific detail is provided in the supporting Testimony³⁴).

- Energy Efficiency
- Customer Enrollment
- In-Home Energy Education
- Training Center
- Inspections
- Marketing and Outreach
- Statewide ME&O
- Measurement and Evaluation Studies
- Regulatory Compliance
- General Administration
- CPUC Energy Division

³⁴ See Exhibit SCE-1, Section II. J. 2. at pp. 84-85.

3. 2009-2011 and 2012-2014 Budget Comparison

SCE's 2012-2014 three year Energy Savings Assistance Program total budget is unchanged from SCE's 2009 – 2011 program budget. The budget categories and subcategories for 2012-2014 were revised by the Commission and do not fully align with the categories and subcategories that were authorized for 2009 – 2011. Therefore, SCE has provided only the total authorized annual funding for 2009 – 2011 in the comparison in Table V-2 below.

Table V-2
PY 2012-2014 Energy Savings Assistance Program Proposed Electric Budget Southern California Edison

	PY 2009 - 2011 Authorized \$ (000)	PY 2012 - 2014 Authorized \$ (000)
Energy Savings Assistance Program		
Energy Efficiency		
<i>Appliances</i>		\$52,916
<i>Domestic Hot Water</i>		\$129
<i>Enclosure</i>		\$675
<i>HVAC</i>		\$68,724
<i>Maintenance</i>		\$0
<i>Lighting</i>		\$8,239
<i>Miscellaneous</i>		\$11,901
<i>Customer Enrollment</i>		\$14,133
In Home Education		\$3,136
Pilot		\$0
Energy Efficiency Total		\$159,854
Training Center		
Training Center		\$900
Inspections		\$4,000
Marketing and Outreach		\$4,040
Statewide Marketing Education and Outreach		\$360
Measurement and Evaluation Studies		\$270
Regulatory Compliance		\$1,780
General Administration		\$13,833
CPUC Energy Division		\$180
TOTAL PROGRAM COSTS	\$185,217	\$185,217
Not Subject to This Application – Funded Outside of Energy Savings Assistance Program Budget		
Indirect Costs		
NGAT Costs		

4. Tracking and Reporting Program Costs is consistent across utilities

SCE proposes to track 2012-2014 program costs consistent with the program budget categories and subcategories included in the Assigned Commissioner's Ruling and Guidance Document dated March 30, 2011³⁵ and described in more detail in the supporting Testimony.³⁶ The funding categories and subcategories were developed by the utilities working with Energy Division.

5. Required Budget Flexibility and potential Fund Shifting

SCE proposes one change to the fund shifting guidance established in D.10-10-008. SCE believes carrying funds forward or backward within the authorized 2012 - 2014 three-year budget should not be considered fund shifting if the funds that are carried forward or backward remain within the budgeted category or subcategory. SCE requests the Commission to issue policy direction that addresses carrying funds forward or backward within a cycle independently from guidance provided for shifting funds among categories or subcategories.

K. Revenue Requirements and Rate Impacts

1. Rate Making Treatment

SCE proposes no change to the currently-approved Energy Savings Assistance Program ratemaking as authorized in D.05-04-052, D.05-12-026, and D.08-11-031. SCE's current ratemaking associated with its Energy Savings Assistance Program includes: 1) the recovery of the Commission-authorized Energy Savings Assistance Program revenue requirement through the operation of the Public Purpose Programs Adjustment Mechanism (PPPAM), and 2) the comparison of the authorized Energy Savings Assistance Program revenue requirements with actually incurred Energy Savings

³⁵ Assigned Commissioner's Ruling and Guidance Document, dated March 30, 2011, in A.08-05-022.

³⁶ See Exhibit SCE-1, Section II. J. 2. at pp. 84-85.

Assistance Program expenses in the Low-Income Energy Efficiency Programs Adjustment Mechanism (LIEEPAM).

Through the operation of the PPPAM, on a monthly basis SCE compares recorded Public Purpose Programs Charge (PPPC) revenue with authorized Public Purpose Programs costs, including Public Goods Charge revenue requirements and other authorized expenses such as authorized Energy Savings Assistance Program revenue requirements. In SCE's annual August 1st Energy Resource Recovery Account (ERRA) Forecast applications, SCE sets forth its consolidated revenue requirement for the subsequent year. Included in the consolidated PPPC revenue requirement will be the authorized Energy Savings Assistance Program revenue requirement plus the estimated year-end PPPAM balance. Through the operation of the LIEEPAM, SCE compares the authorized Energy Savings Assistance Program revenue requirement with actual Energy Savings Assistance Program expenses. The balance recorded in the LIEEPAM is carried over from one year to the next.

2. Revenue Requirement and Rate Impacts

SCE's 2012 – 2014 Energy Savings Assistance Program will require \$185.2 million in funding. The level of funding is unchanged from SCE's 2009 – 2011 three year funding total of \$185.2 million. The rate impacts by customer class are provided in Exhibit SCE-2, Appendix C, Attachment C-1.

3. Unused Funds From Prior Budget Cycles

SCE projects funds will not be available from prior funding cycles to offset the revenue requirement for the 2012 – 2014 Energy Savings Assistance Program. In the event funding is available, however, SCE requests authorization to carry such funding into the 2012 – 2014 program cycle.

L. Conclusion

SCE requests approval of its 2012, 2013, and 2014 program budgets, plans and ratemaking for the Energy Savings Assistance Programs. To the extent any measures or practices are disapproved, SCE requests they be clearly identified. Specifically, SCE requests:

- Authorization to carry any unspent 2009-2011 Energy Savings Assistance Program funds over to the 2012-2014 program cycle;
- Approval of a three-year \$185.2 million budget and program plans for the 2012-2014 program cycle, with authority to carry forward or carry back funding within the program cycle to ensure seamless delivery of service to customers;
- Revisions, as described in this Testimony, to fund-shifting restrictions adopted in D.10-10-008, to allow SCE to carry funds forward or backward within the authorized 2012-2014 program cycle budget without such action being defined as “fund-shifting;”
- Approval to offer the measure mix for the Energy Savings Assistance Program as proposed in this Application;
- Approval to retire some existing measures as proposed;
- Authorization to continue leveraging resources in providing gas-related measures and weatherization services to customers receiving gas service from SCE on Catalina Island;
- Approval to expand refrigerator eligibility to include units built from 1993 through 1998;
- Approval to revise the three-measure rule to allow installation of all cost-effective measures, including CFLs;
- Approval to continue providing appliances at no cost to LIHEAP providers;
- Authorization to conduct two EM&V studies as described in this Application;

- Authorization to revise the Statewide Policies and Procedures Manual and Weatherization Installation Standards Manual to reflect Commission direction in this proceeding for the 2012-2014 program cycle after receiving appropriate public input;
- Authorization to fund Energy Savings Assistance Program activities in 2012 using proposed 2012 program funds in the event of Commission delay in issuing a decision on SCE's 2012-2014 Application;
- Approval of SCE's proposed "infeasible homes" definition;
- Commission direction to develop a policy document that captures all Energy Savings Assistance Program policy;
- Authorization to propose mid-cycle adjustments to program measures or criteria within the authorized 2012-2014 program cycle budget through Advice Letter filing; and
- Authorization to continue currently-approved Energy Savings Assistance Program ratemaking.

VI.

CARE PROGRAM

A. Overview

1. California Alternate Rates for Energy Program Summary

The California Alternate Rates for Energy (CARE) Program provides a monthly discount to customers that meet the program requirements. Residential customers that meet the program requirements are eligible to receive this discount, in addition to Group Living Facilities that meet other special program requirements also qualify. The discount reduces customer bills by a minimum of 20% with some high-use customers receiving a discount of up to 30% or more each month.

SCE and the other California utilities have been national leaders in reaching out to low-income customers who are eligible for rate assistance, focusing their outreach efforts on newly-needy customers that were impacted by the declining economic conditions.

From 2012 through 2014, SCE will continue efforts to ensure that eligible customers have the ability to enroll on the CARE/FERA programs, including customers that may have traditionally not needed assistance.

SCE proposes an authorized budget of \$5.351 million for 2012, \$5.465 million for 2013, and \$5.621 million for 2014 which includes the annual resources necessary to fund anticipated expenditures for program activities including outreach, automatic enrollment, processing, certification, recertification, post enrollment verification, information technology, and general administration.

a) **Elements and strategies in the proposed 2012-2014 CARE program are specifically designed to maintain or exceed a penetration goal of 90%**

SCE will continue to deploy successful strategies to maintain or exceed a CARE penetration goal of 90%. These elements include: enrollment efforts through multiple enrollment channels including the ability to enroll in CARE or FERA via a live SCE phone center representative, online, via Capitation and other third-party contractors (including retail partners), and via SCE's VRU. During 2012-2014, SCE will explore the ability to increase the languages offered to enroll eligible customers in their preferred language.

ME&O will continue to play a significant role in reaching eligible customers not already enrolled in CARE/FERA. To reach customers, SCE will use a mix of delivery channels such as: bill inserts, grassroots outreach, outbound calling, call center, email, text messaging, SCE.com, media relations, Spanish language television telecasts, targeted direct mail, SCE's Welcome Kit for new residential customers, educational initiatives and ethnically-focused Community Forums, annual program solicitations, and social media (currently under exploration).

b) Enrollments during the 2012-2014 program years and the required budget to meet this goal.

Assuming that economic conditions will improve within the next three years, the expectation is that some customers currently enrolled in the CARE/FERA programs may no longer be eligible in future years. As a result, the current CARE enrollments for SCE may decline from existing levels within the coming years.

2. Utility Requests

In 2012-2014, SCE will continue to its efforts to enroll all CARE-eligible customers who wish to participate in the program. These efforts will focus on maximizing new customer enrollments by targeting hard-to-reach customers, and minimizing program attrition. The overall administrative budget will remain the same for 2012-2014 from what was approved in 2009-2011, with some changes within the expenditure categories.

The Table included in section (d) below sets forth SCE's proposed CARE administrative budgets for 2012-2014. The format is consistent with the table included in Exhibit SCE-2, Appendix B, Attachment B-1. As of February 28, 2011, SCE had 1,404,898 customers participating in the CARE program out of 1,446,411 estimated eligible. SCE will continue efforts to enroll all eligible customers who have not enrolled in the program.

SCE proposes an administrative budget of \$5.351 million for 2012, \$5.465 million for 2013, and \$5.622 million for 2014. The overall administrative budget will remain the same for 2012-2014 from what was approved in 2009-2011, with some changes within the expenditure categories. This proposed budget includes the necessary annual resources to fund anticipated expenditures for program activities including

outreach, program support, information technology, data sharing with other IOUs, and other CARE program activities.

If actual expenditures for implementing all aspects of CARE administration exceed the proposed budget due to an increase in the Commissions initial scope of work, SCE will seek to be fully compensated for any reasonable increased costs incurred as a result of implementing the Commission's policy. SCE also requests flexibility to reallocate funding among budget categories as required to meet CARE goals and objectives. This flexibility and the two-way balancing account afford the utilities the best tools to efficiently operate the program and reach program goals.

a) Existing program elements and strategies to be continued

Enrollment efforts through multiple enrollment channels will continue for 2012-2014. These channels including the ability to enroll in CARE or FERA via a customer representative, online enrollments, enrollments via the Capitation Program and other third-party contractors (including retail partners), enrollments via SCE's Voice Response Unit (VRU), internal and external data sharing, targeted marketing campaigns, and strategic internal and external outreach partnerships.

Recertification efforts will continue through 2012-2014 including the ability for customers to recertify online or via SCE's VRU system, the ability for customers to recertify in the language in which they submitted their original enrollment/application, via data sharing between SCE and SoCalGas, and via automatic recertification through SCE's revised Recertification Probability model.

b) New program elements and strategies to be implemented including estimates of budgets for these new approaches

Table VI-3 below identifies the new proposed CARE program elements, and associated costs, to be implemented within the 2012-2014 program cycle.

The new strategies, which are defined in greater detail in the supporting Testimony,³⁷ include changes to existing verification practices, automating or updating existing operational processes, improving customer communications by allowing customers to select preferred method of communications, and centralizing the CARE customer letter databases.

Table VI-3
New CARE Program Elements to be Implemented 2012-2014

New CARE Program Elements to be Implemented 2012-2014	
Description:	Estimated Costs:
Operational:	
Increased Verification Processing	\$2,100,000
Information Technology Enhancements:	
Automate new verification stratified selection model:	\$300,000
Internal File Sharing with ESA/EAF to share program: verifications	\$500,000
Update Recertification Probability Model	\$500,000
Enhance CARE/FERA application and related systems to allow customers the ability to select preferred method of selection for future communications:	\$1,000,000
Centralized database for customer communications /program letters	\$600,000
Subtotal: Information Technology Enhancements	\$2,900,000
GRAND TOTAL:	\$5,000,000

c) **Proposed Pilots and Studies to be conducted if any**

SCE is not proposing pilots nor studies during the 2012 through 2014 CARE program. Instead, SCE will enhance existing outreach strategies and

³⁷ See Exhibit SCE-1, Section III. D. 3. at pp. 105-109.

improve its processes in order to increase efficiency and enroll and retain customers who wish to participate in the program.

d) Total requested budget of the portfolios for each year, and for the entire budget cycle

The Table included below sets forth SCE’s proposed CARE administrative budgets for 2012 – 2014. This proposed budget includes the annual resources necessary to fund the existing strategies to be continued through 2012-2014 including outreach; processing; certification & recertification; verification; and IT Programming, in addition to the new and proposed strategies explained in the supporting Testimony.³⁸

***Table VI-4
2012-2014 Proposed CARE Administrative Budgets***

CARE Budget Categories	Authorized	Planned Budgets			
	2011 Authorized \$ (000)	2012 Planned \$ (000)	2013 Planned \$ (000)	2014 Planned \$ (000)	2012 - 2014 Planned \$ (000)
Outreach	\$ 2,230	\$ 2,050	\$ 2,100	\$ 2,155	\$ 6,305
Processing, Certification, Recertification	\$ 900	\$ 530	\$ 559	\$ 588	\$ 1,677
Post Enrollment Verification		\$ 700	\$ 700	\$ 700	\$ 2,100
IT Programming	\$ 1,000	\$ 950	\$ 950	\$ 1,000	\$ 2,900
Cool Centers	N/A	N/A	N/A	N/A	N/A
Pilots	\$ -	\$ -	\$ -	\$ -	\$ -
Measurement and Evaluation	\$ 56	\$ 50	\$ 50	\$ 50	\$ 150
Regulatory Compliance	\$ 145	\$ 251	\$ 265	\$ 264	\$ 780
General Administration	\$ 948	\$ 680	\$ 702	\$ 725	\$ 2,107
CPUC Energy Division Staff	\$ 206	\$ 140	\$ 140	\$ 140	\$ 420
Subtotal Management Costs	\$ 5,485	\$ 5,351	\$ 5,465	\$ 5,622	\$ 16,438
Subsidies and Benefits	\$ 211,400	\$ 330,200	\$ 376,900	\$ 416,800	\$ 1,123,900
Total Program Costs and Customer Discounts	\$ 216,885	\$ 335,551	\$ 382,365	\$ 422,422	\$ 1,140,338

³⁸ See Exhibit SCE-1, Section III. D. 3. at pp. 105-109.

a) Total number of households to be enrolled for each year, and for the entire budget cycle

SCE will continue to deploy strategies to maintain or exceed a CARE penetration goal of 90%, and will continue its efforts to enroll all eligible customers who wish to participate in the program.

b) Exceptions requested

SCE is not requesting any exceptions from its existing strategies/proposals within this budget request.

B. Background

1. CARE Summary - Legal Framework of CARE

In 1989, the Commission issued D.89-07-062 and D.89-09-044 which adopted the Low-Income Rate Assistance (LIRA) program to provide rate assistance to customers with the greatest need. At that time, the LIRA program provided a 15% discount to eligible customers, with program eligibility established at 150% of federal poverty guidelines using General Order 153, originally written for the Universal Lifeline Telephone Service, as a benchmark.

The Commission responded to AB 1890 with the establishment of the Public Goods Charge (PGC) in 1998, which is applied to each kWh sold by the IOUs. The PGC is applied to all rate schedules for the purpose of funding the CARE and FERA programs, including other low-income programs.

In 2001, in D.01-06-010, the Commission raised the CARE income guidelines from 150% to 175% of federal poverty guidelines and increased the CARE discount from 15% to 20%, which remains in effect.³⁹ In 2005, the Commission issued D.05-10-044,

³⁹ In D.01-03-082, the Commission had raised income eligibility from 150% to 175% for just SCE and PG&E. D.01-06-010 raised the income eligibility for SoCalGas and SDG&E.

which increased the upper limit of CARE income eligibility from 175% to 200% of federal poverty guidelines.

3. Program Eligibility Guidelines

The CARE eligibility guidelines are approximately 200% above Federal Poverty Guidelines, which are updated annually in June. The FERA eligibility guidelines are approximately 250% above Federal Poverty Guidelines and are also updated annually in June. Income guidelines are determined by total number of persons in the household and total combined annual income. The CARE rate is also available to group-living facilities that have tax exemption under IRS Code 501 (c)(3), have a minimum of 70% of the energy consumed at the facility used for residential purposes.

SCE residential customers that receive assistance through pre-selected government and community-funded programs are also eligible for CARE through “categorical eligibility.” These customers are not required to provide income information to determine eligibility, rather demonstrate their eligibility by indicating enrollment into one of these mean-tested programs which include: Medi-Cal or Medicaid, Food stamps or SNAPS, TANF and Tribal TANF, WIC, Healthy Families A&B, LIHEAP, SSI, National School Lunch program, Bureau of Indian Affairs General Assistance, and Head Start Income Eligible (Tribal Only).

In order to qualify for CARE or FERA, it is required that the SCE customer account holder or authorized person in the household self-certify the household’s eligibility into the CARE or FERA programs. Customer declaration of program eligibility, or self-certification, is all that is required for program enrollment, in accordance with D. 89-07-062.

B. Program Goals

In 2012-2014, SCE will continue its efforts to enroll all-CARE eligible customers who wish to participate in the program. These efforts will focus on maximizing new customer

enrollments and minimizing attrition, mainly from CARE participants who fail to return to a CARE application during the recertification process, or do not respond to a verification request.

C. Program Delivery

1. Existing Strategies to be Continued

SCE will continue many of the strategies that helped produce success in 2012 – 2014.

a) Outreach

As demonstrated by CARE penetration levels, program enrollment efforts were extremely effective during the 2009-2011 program cycle. Similar enrollment efforts will continue through the 2012-2014 program cycle, including phone center enrollments via a customer representative, enrollments via third-party IVR contractors, web enrollments, data sharing through internal and external sources, Capitation Program enrollments, and outreach and marketing tactics.

To effectively reach customers, information will be provided in multiple languages (English, Spanish, Chinese, Korean, Vietnamese, and Cambodian) and printed materials will be available in large type for visually impaired customers. Additionally, program references and messaging will be integrated into Medical Baseline collateral to reach customers with special needs and disabilities.

SCE and SoCalGas have begun discussions on the feasibility of joint marketing and outreach efforts for CARE in their overlapping service territories. SCE and SoCalGas believe a joint collaboration could provide advantages such as shared costs and efficiencies for the CARE program. For 2012 - 2014, SCE plans to explore these joint marketing opportunities with SoCalGas.

b) Processing, Certification & Recertification

During the 2009-2011 cycle, SCE made technology improvements to its recertification processes to improve program operations and reduce program attrition. Specifically new IVR alerts were implemented to enhance the existing letter notifications to customers, and link customers directly to SCE's Recertification IVR line. The existing outbound IVR recertification alerts are being conducted in English and Spanish.

An additional recertification improvement that was implemented during the 2009-2011 program cycle was extending the recertification and verification response time from 60 to 90 days to reduce program attrition and align with other IOUs processes.

SCE also improved the enrollment and recertification process for Domestic Multiple Service (DMS) (e.g., submetered) customers by allowing them to enroll on CARE/FERA via the web, and modifying their recertification date to coincide with their CARE enrollment anniversary date.

c) Verification

SCE in 2009 – 2011 required approximately 1% of CARE customers to verify income eligibility for the CARE program. SCE has a verification model that selects customers for verification using a stratified random sampling process where all customers have some identified probability of being selected for income verification, with the probability increasing for high energy users, taking into consideration climate and household size. SCE is proposing adjustments to its CARE verification policy in the “New and Proposed Strategies” section below.

d) IT Programming

SCE has allocated \$2.9 million of the 2012-2014 IT funding for costs associated with maintaining all systems related to the CARE program. Included in these costs are the following: labor involved in the initial assessment of effort required for major enhancements, impromptu reporting and data queries as requested either internally or by a regulatory body, the use of server space for data retention, work involved with small enhancements to existing functionality.

Operational and information technology enhancements will also be implemented during 2012-2014 to improve program efficiencies and align with other IOU efforts.

Energy Savings Assistance Program recipients are automatically enrolled in CARE each month and LIHEAP payment recipients are automatically enrolled in CARE on a quarterly basis. SCE also enrolls new CARE customers through the EAF program which provides utility payment assistance through voluntary customer and employee donations. In addition, SCE exchanges data with SoCalGas on a monthly basis. SCE also shares data with PG&E, Southwest Gas and the LIHEAP Program.

e) Pilots

SCE is not proposing pilots for the 2012-2014 CARE program. Instead, SCE will enhance existing outreach strategies and improve its processes in order to increase efficiency and through enrollment and retention of customers who wish to participate in the program.

2. Incorporating Evaluation and Study Results

SCE did not conduct CARE related studies or evaluations during the 2009-2011 program period.

3. New and Proposed Strategies

a) Verification

SCE knows the program will be most successful if subsidy dollars are received by customers who are eligible for the program. SCE proposes to modify its CARE income verification policy in 2012 – 2014 in a manner that complements the Commission’s goal to enroll all eligible and willing customers on CARE. The Commission’s self-certification policy for CARE has minimized hurdles to enrollment and enabled millions of eligible customers throughout California to realize energy bill savings.

SCE in 2012 – 2014 proposes to extend the income verification requirement from 12 to 24 months for customers who do not initially respond to a verification request. However, if at any time during the 24 months customers verify eligibility, they will be placed back on CARE. After 24 months, customers will be able to enroll in CARE by self-certifying their household and income eligibility.

As indicated above, SCE’s stratified verification model provides that all customers have some probability of being selected for income verification with the probability increasing for high energy users. SCE is considering adjustments to the model in 2012 – 2014. Data that may be considered for use in the model are high-energy use within specific climate zones or housing types, and market research or credit reporting data. Entry onto CARE through programs such as SCE’s EAF or other categorical eligible programs may also influence the probability of being selected to verify income. SCE will return to the Commission for approval of any modifications to the model prior to implementing them in 2012.

b) Automation of new stratified random selection model

The new stratified random selection model, implemented by SCE in April 2011, identifies customers selected to be verified on a monthly basis, using a program that creates a sampling frame from the CARE population, executes sampling, calculates necessary weights for later use in estimation. SCE plans to automate this model so that this list is “system-generated” rather than user-invoked each month.

c) Develop the ability to share internal verifications with the Energy Assistance Fund and the Energy Savings Assistance Program

Currently, SCE data shares internal enrollment efforts with other income-qualified programs including the EAF and the Energy Savings Assistance Program which align with the CARE program guidelines. SCE shares information between these programs to enroll customers on CARE if they are not already enrolled; however, program verifications are not shared between internal programs. This proposed internal data sharing may also include the development of new processes where data of customers that did not pass program verifications through EAF and/or the Energy Savings Assistance Program can be shared with CARE.

d) Update existing Recertification Probability Model

During 2012-2014, SCE proposes to review the customer variables used in the probability model including the data that was used to develop the model, and a review of the model specifications to identify changes/improvements and implement these changes by 2014.

e) **Allow customers to select preferred method of communication in the application and related systems for future communications**

Currently, customers are able to enroll in CARE/FERA through several channels. By selecting the preferred method of communication at time of enrollment, and potentially at time of recertification, SCE proposes to tailor future communications with customers to fit their specific needs.

f) **Centralize the customer letter database into one storage warehouse rather than the existing four warehouses**

There are over 60 customer letters that are used for CARE/FERA program operations that are currently stored in four distinct and unrelated databases within SCE. The customer letters are available in multiple languages and encompass several operational processes including a welcome letter at time of new enrollment, multiple recertification and verification letters, letters specific to CARE customers that live in mobile-home parks or group-living facilities, and letters to notify customers they are not eligible for the discounted rates. SCE proposes to centralize all customer letters into a common database/warehouse to streamline this operational process.

D. Other CARE Program Elements

1. Over-the -phone CARE Enrollments

SCE requests authorization to enroll customers over the phone onto the CARE rate and record charges to the CARE program budget in 2012-2014. Over-the-phone CARE enrollment clearly is incremental to base level call center activity. The call center representatives enroll customers using SCE's web enrollment capability. This has been a highly effective way to support the CARE program through personal customer engagement. Specifically, eligible customers can immediately be enrolled on the CARE

or FERA rate when they call to request information or to resolve issues that have prevented their previous attempts to enroll in CARE.

2. CARE Capitation Program Name Change

SCE expects to continue to partner with CBOs and other entities in 2012 – 2014 to engage customers one-on-one and enroll them on the CARE rate. SCE plans to increase its partnership efforts to include greater emphasis on recruiting agencies who serve individuals with disabilities and those who serve individuals with limited or no English. During 2011, SCE increased its communication with participation agencies through the implementation of a quarterly newsletter. Participating agencies will continue to receive a fee for every new customer that is successfully enrolled onto CARE. SCE is requesting authorization to replace the Capitation name with a new name: CARE Community Enrollment Program.

3. Cooling Center Budgets

SCE is not proposing to fund Cool Centers through the CARE program budget. SCE's Cool Center proposed funding for 2012 – 2014 is described in Section VII. D. of this Application as well as in the supporting Testimony.⁴⁰

4. Categorical Eligibility

Although SCE supports the continued approach to allow customers enrolled in a means-tested assistance program to categorically enroll in CARE by stating their enrollment in one of these programs, SCE would be in support of a CPUC review of all existing categorical eligible programs to ensure alignment with CARE income-guidelines.

⁴⁰ See Exhibit SCE-1, Section IV. D. at pp. 119-120.

E. Pilots

SCE is not proposing new CARE pilots in 2012-2014. However, on November 19, 2010, via Resolution CSID-004, the CPUC authorized the use of CARE program funds to fund a one-year pilot program, CHANGES, to provide limited English proficient consumers an in-language education, need and dispute resolution, and outreach for energy matters. The SCE cost for this pilot, implemented by all of the major investor-owned utilities in the state, is \$150,000 for 2011. During 2011, the CPUC will assess the program effectiveness and pilot results.

F. Studies

SCE is not proposing new CARE-related studies during 2012 – 2014.

G. Budget

1. Specific CARE strategies and programs

The previous table included above in Section A. 2. d) of this Application sets forth SCE's proposed CARE administrative budgets for 2012 – 2014, which includes \$5.351 million for 2012, \$5.465 million for 2013, and \$5.622 million for 2014. This proposed budget includes the annual resources necessary to fund the existing strategies to be continued through 2012-2014, in addition to the new and proposed strategies explained in the supporting Testimony.⁴¹

2. Tracking and Reporting Program Costs is consistent across utilities

SCE proposes to track 2012-2014 program costs consistent with the program budget categories and subcategories included in the Assigned Commissioner's Ruling and Scoping Document dated March 30, 2011 and described in more detail in the

⁴¹ See Exhibit SCE-1, Section III. D. 3. at pp. 105-109.

supporting Testimony.⁴² The funding categories and subcategories were developed by the utilities working with Energy Division.

3. Required Budget Flexibility and potential Fund Shifting

SCE requests the Commission maintain the fund shifting requirements for CARE as adopted in D.08-11-031 and D.10-10-008.⁴³

H. Revenue Requirements and Rate Impacts

1. Ratemaking Treatment

The purpose of the CARE Balancing Account (CBA), as adopted in D.05-04-052, D.05-12-026 and D.06-12-038, is to record: (1) the difference between CARE discounts provided to CARE-eligible customers and CARE surcharges billed to non-CARE customers; (2) the difference between the authorized CARE and FERA⁴⁴ administrative amounts and actual incurred CARE and FERA administrative expenses; (3) recorded costs associated with the CARE automatic enrollment program; and (4) recorded costs associated with the Energy Division's audit of the CBA.⁴⁵ SCE currently recovers the CARE administrative revenue requirement through the PPPC rate component. Pursuant to D.06-12-038, SCE transfers the December 31st balance recorded in the CBA to the

⁴² See Exhibit SCE-1, Section III. H. 2. at p. 111.

⁴³ See D.08-11-031, pp. 164-174; see also D.10-10-008, O.P. 1-4.

⁴⁴ CPUC approved SCE Advice 2300-E authorizing SCE to include the FERA-related Operations and Maintenance (O&M) Administrative funding in the authorized CARE administrative revenue requirement, record actual FERA-related expenses in the CBA and, upon Commission approval, transfer the December 31, 2008 FERABA balance to the PPPAM balancing account and eliminate Preliminary Statement, Part Z, FERABA.

⁴⁵ The CBA also includes entries associated with: 1) actual costs incurred associated with the automatic enrollment program per D.02-07-033, 2) reimbursements made to the Energy Division associated with Energy Division's audit of SCE's CARE programs; and 3) undercollections in revenue resulting from waiving reconnection fees for CARE customers from November 1, 2005 through April 30, 2006. The annual total of these amounts are relatively small.

PPPAM. SCE either returns to or recovers from customers the over/under-collected CBA balance through the operation of the PPPAM.⁴⁶

2. Revenue Requirement and Rate Impacts

Administration of SCE's 2012 – 2014 CARE program will require \$16.4 million in funding. The level of funding is unchanged from SCE's 2009 – 2011 three year funding total of \$16.4 million. The rate impacts by customer class are provided in Exhibit SCE-2, Appendix C, Attachment C-1.

SCE estimates the value of the CARE rate discount to participating customers at \$330 million in 2012, \$377 million in 2013 and \$417 million in 2014. Exhibit SCE-2, Appendix C, Attachment C-1 provides information on the impacts of the CARE discount on rates for SCE's customer classes.

I. Conclusion

SCE requests approval of its 2012, 2013, and 2014 program budgets, plans and ratemaking for the CARE programs. Specifically, SCE requests:

- Approval of \$5.351 million for 2012, \$5.465 million for 2013, and \$5.622 million for 2014 for CARE program administration;
- Approval to reallocate funding among CARE budget categories as changing conditions warrant to meet CARE goals and objectives;
- Approval to increase income verification to 5% of participating customers annually in 2012-2014;
- Approval to extend the income verification requirement from 12 to 24 months for customers who do not initially respond to a verification request;
- Approval of new CARE processes described in this Testimony;

⁴⁶ The estimated December 31st balance recorded in the PPPAM is consolidated into PPPC revenue requirements and PPPC retail rate levels in SCE's annual ERRRA Forecast proceedings.

- Approval of CARE ratemaking treatment as described in this Testimony; and
- Authorization to fund CARE activities in 2012 using proposed 2012 program funds in the event of Commission delay in issuing a decision of SCE's 2012-2014 Application.

VII.

COOL CENTER PROGRAM

A. Overview

This Application requests approval of its 2012-2014 Cool Center program plans, program budgets, and proposed ratemaking treatment.

In the extreme climate areas of SCE's service territory, the ability to find relief from the heat has a major impact on comfort health and safety, particularly for SCE's low-income, seniors and customers with disabilities. SCE's 2012-2014 Cool Centers program proposal is designed to provide services to communities located in extreme climate areas where few public facilities are available to use to offer relief from the heat during the hot summer months.

The objectives of the Program are:

- Save money and energy by reducing individual energy consumption;
- Reduce environmental impacts due to reduced energy consumption;
- Reduce potential health hazards associated with hot climate temperatures;
- Increase awareness about energy efficiency practices through education; and
- Provide information about low-income, Energy Efficiency programs, and other available community programs.

B. Background

The Cool Center program originated in 2001, when a task force of CBOs from San Bernardino and Riverside Counties forwarded to the Commission four unsolicited proposals to establish 29 Cool Center sites in the Inland Empire. SCE's Cool Centers provide low-income,

senior, and residents with disabilities an alternative to running their refrigerated air-conditioning systems by providing a safe, cool place where they can gather during the hot summer months. SCE ran a Cool Center program in the summers of 2001 through 2004. SCE was unable to run its Cool Center program in 2005 due to the program changes set forth by the Commission in D.05-04-052.⁴⁷

In accordance with D.05-12-026, SCE complied with the Commission's request and worked with past Cool Center contractors, the Commission's Division of Ratepayer Advocates (DRA), the Low-Income Oversight Board, and others to develop a 2006 Cool Center program. On June 7, 2006, SCE filed Advice 2011-E, seeking the Commission's authorization to establish a Cool Center program for the summer of 2006.

On December 14, 2006, the Commission issued D.06-12-038, which among other things, adopted SCE's Cool Center program and budgets for 2007 and 2008.

In May 2008, SCE submitted a budget request to continue Cool Center Program operations for 2009-2011. Subsequently, in D. 08-11-031, the Commission authorized SCE's request to run approximately 20 Cool Centers within hot climate zones per year for 2009-2011.

SCE conducted an evaluation of the Cool Center Program in 2009⁴⁸ to examine the overall effectiveness and efficiency of the Cool Center Program. The recommendations from the 2009 evaluation as well as ongoing quality assurance and program monitoring have guided the program design and implementation as put forth in this Application.

⁴⁷ In D.05-04-052, the Commission eliminated the following budget categories from SCE's 2005 Cool Center Program proposal (which were previously permitted in SCE's 2001-2004 Cool Center Programs), leaving only \$95,000 to run the 2005 program: rent, utilities, insurance, janitorial services, other overhead costs, transportation (bus passes, vehicle rental, fuel costs), staffing at Cool Centers, as well as snacks and beverages for Cool Center attendees. SCE contacted its active Cool Center operators to discuss the program changes that were directed by the Commission, and all program operators declined participation due to the new limitations on eligible expense categories for reimbursement and concern over income qualifying Cool Center attendees.

⁴⁸ "Southern California Edison Cool Center Program Evaluation of the 2009 Program Year" conducted by Hiner and Partners (completed March 2010).

The 2009 Cool Center Evaluation study recognized the value of the Cool Center Program to SCE's customers. Therefore, SCE proposes to continue the Cool Center Program in 2012-2014 with the following program modifications:

- Doing more standardized outreach and marketing, with SCE providing collateral materials for consistency across all Cool Centers.
- Improvements to the Cool Center Contracts and reporting templates for improved ease of program reporting by the Cool Center operators and more efficient SCE reconciliation of program expenses.
- Strategically identifying new locations based on income demographics and hot climate zones, and
- Using established community-based organizations that already provide services to lower income or elderly customers.

C. Program Goals

SCE's 2012-2014 Cool Center program proposals are designed to continue to provide services to communities located in extreme climate areas where few public facilities are available for use to offer relief from the heat during the hot summer months. .

SCE has identified communities in San Bernardino, Riverside, Kern and Tulare County locations that meet the criteria for Cool Centers. Cool Centers must have air conditioning, exist in extreme heat locations, ensure the environment is comfortable and conducive to visitation, provide refreshments and admit all participants who wish to use the Cool Center for its intended purposes regardless of age, gender, race, religion, ethnicity, or sexual orientation. The program runs from June 1st to October 15th, Monday through Friday, from 10:00 AM to 5:00 PM. All site locations are accessible to persons with disabilities.

SCE anticipates that the proposed budget will fund approximately 20 Cool Centers in the target communities. Whenever possible, SCE will seek to contract with its past site operators to maximize opportunities to reduce costs through use of existing infrastructure, equipment, and

expertise. In some areas, SCE may find it more efficient to work with new CBOs that are located in these communities.

During Program Years 2012-2014 SCE will develop a new outreach method to provide Cool Center participants with greater targeted information regarding specific SCE programs/services to help them pay their bill, reduce their usage and learn more about energy efficiency.

D. Budget

1. Specific Cool Center strategies

Table VII-5 below represents the costs associated with the 2012 through 2014 Cool Center programs. These expense categories have been used as a part of the Cool Center operations budget since 2002 and have helped with the oversight of each Cool Center as well as the overall program operations. The budget categories, described in further detail in the table below include: operations, marketing, management, and measurement and evaluations.

Table VII-5
SCE's Proposed Cool Center Program Budgets for 2012 through 2014

Category	Description of Expenditure	Budget \$(000)			
		2012	2013	2014	Total 2012 – 2014
Operations	Incremental costs for staff, janitorial, insurance, office supplies, rent, bookkeeping, administration, management oversight, utilities, transportation, and other miscellaneous expenses. Incremental costs would not have been incurred by the Agency but for the operation of the Cool Center.	\$550	\$550	\$550	\$1,650
Marketing	Costs associated with providing prepared press releases for local publications and standardized scripts for electronic media in the Cool Center areas, providing standardized signage to identify Cool Centers from the street, and utilizing resources to permit SCE to advertise the availability of the Cool Centers.	\$20	\$20	\$20	\$60
Management	Labor costs for planning and SCE management oversight. Reviewing and reconciling monthly expenditures and operations reports. Facilitating payments, ensuring program guidelines are followed, providing training, and preparing management reports.	\$187	\$188	\$196	\$571
Measurement & Evaluation	Evaluation of the program by an independent evaluation contractor	\$10	\$10	\$10	\$30
Total		\$767	\$768	\$776	\$2,311

2. Required Budget Flexibility and potential Fund Shifting

SCE has presented a detailed breakdown of the administration and implementation costs that are expected to be incurred in operating the Cool Centers in 2012, 2013, and 2014. SCE requests full authority to shift funds among program categories in 2012, 2013, and 2014 in order to meet the needs of the program delivery

contractors and meet unexpected needs and opportunities to deliver and improve upon the program.

Additionally, if the Commission should be delayed in issuing a decision on SCE's Application, SCE requests interim authorization from the Commission to continue Cool Center activities as necessary to enable timely implementation of the Cool Centers in the summer of 2012. Costs incurred prior to the summer are expected to be limited primarily to oversight activities. SCE requests authorization to carry any unspent funding forward to subsequent years during 2012 – 2014.

E. Revenue Requirements and Rate Impacts

1. Rate Making Treatment

Consistent with Advice 2011-E and D.06-12-038, as modified by D.07-06-004, and as authorized in D.08-11-031, SCE proposes to continue to record the 2012-2014 Cool Center program expenses to the PPPAM by modifying Preliminary Statement, Part FF, PPPAM, to record up to \$767,000 in 2012; \$768,000 in 2013; and \$776,000 in 2014 as incremental Cool Center program costs associated with implementing the 2012, 2013 and 2014 Cool Center programs.

The PPPAM balance is consolidated in SCE's PPC revenue requirement and included in PPC rate levels in SCE's annual ERRA forecast proceeding.

The Cool Center program costs may be reviewed by the Commission, along with all entries recorded in the PPPAM, in SCE's April 1 ERRA Review application. As stated above, SCE proposes that the Commission modify the PPPAM to record all incremental Cool Center program-related expenses incurred during the summers of 2012 and 2013 and 2014, not to exceed \$767,000 in 2012; \$768,000 in 2013; and \$776,000 in 2014.

2. Revenue Requirement and Rate Impacts

SCE's revenue requirement for the Cool Center program is \$767,000 in 2012, \$768,000 in 2013 and \$776,000 in 2014. The level of funding is unchanged from SCE's 2009 – 2011 three year funding total of \$2.3 million. Exhibit SCE-2, Appendix C, Attachment C-1 provides information on the impacts of the Cool Center program on rates for SCE's customer classes.

F. Conclusion

SCE requests approval of its 2012, 2013, and 2014 program budgets, plans and ratemaking for the Cool Center program. Specifically, SCE requests:

- Approval of \$767,000 in 2012; \$768,000 in 2013; and \$776,000 in 2014 for Cool Center program administration and implementation;
- Approval to reallocate funding among Cool Center budget categories as changing conditions warrant to meet Cool Center goals and objectives; and
- Authorization to fund Cool Center activities in 2012 using proposed 2012 program funds in the event of Commission delay in issuing a decision on SCE's 2012-2014 Application.

VIII.

PROCEDURAL REQUIREMENTS

A. Statutory and Procedural Authority

This Application is made pursuant to the Assigned Commissioner's Ruling and Guidance Document dated March 30, 2011 in A.08-05-022, and the Commission's Rules of Practice and Procedure, and the California Public Utilities Code.

SCE's request complies with the Commission's Rules of Practice and Procedure Rules 1.5 through 1.11 and 1.13, which specify the procedures for, among other things, filing documents. In addition, this request complies with Rules 2.1, 2.2 and 3.2.

Rule 2.1 requires that all applications: (1) clearly and concisely state authority or relief sought; (2) cite the statutory or other authority under which that relief is sought; and (3) be verified by the applicant. Rule 2.1 sets forth further requirements that are addressed separately below.

The relief being sought is summarized in Section II (Summary of SCE's Requests), Section V. L (Energy Savings Assistance Conclusions), Section VI. J. (CARE Conclusions), Section VII. F. (Cool Center Conclusions), and Section IX. (Conclusions), and is further described in the Testimony (Exhibit SCE-1) accompanying this Application.

The statutory and other authority for this request includes, but is not limited to, California Public Utilities Code Sections 451, 454, 454.3, 491, 701, 702, 728, 729, Article 2 and Rule 3.2 of the Commission's Rules of Practice and Procedure, and prior decisions, orders, and resolutions of this Commission.

SCE's Application has been verified by an SCE officer as provided in Rules 1.11 and 2.1

B. Proposed Categorization

SCE proposes to characterize this proceeding as "ratesetting" as defined in the Commission's Rules of Practice and Procedure Rule 1.3(e) and Public Utilities Code §1701.1(c)(3).

C. Need for Hearings and Proposed Schedule for Resolution of Issues

SCE's proposals submitted herein and set forth in the supporting Testimony and Exhibits constitute a sufficient record for the Commission to rule on SCE's Application without the need for evidentiary hearings. SCE believes that all interested parties can comment and express their views through written protests and comments. However, if hearings are deemed necessary, SCE requests that such proceedings be expedited and the schedule be designed and maintained so that a final decision will be rendered in early October 2011 so as to avoid any substantial delays in program rollout in 2012.

SCE proposes the following schedule, which allows for hearings (if necessary) and expedited Commission resolution of the Application:

SCE files Application	May 16, 2011
Workshop (followed-up by a written Report/Summary)	May 26, 2011
Responses or Protests Filed (with Supporting Testimony)	June 15, 2011
Prehearing Conference	June 22, 2011
Rebuttal or Reply Testimony Filed (if necessary)	June 30, 2011
Concurrent Opening Briefs	August 1, 2011
Evidentiary Hearings (if necessary)	August 15 – 17, 2011
Commission issues Proposed Decision	September 2, 2011
Comments to Proposed Decision	September 22, 2011
Replies to Comments to Proposed Decision	September 27, 2011
Commission issues Final Decision	October 6, 2011

D. Issues to be Considered

The issues to be considered in this Application concern Commission approval of SCE’s proposed 2012-2014 Energy Savings Assistance, CARE and Cool Center program administrative activities, program plans, and budgets, and SCE’s proposed ratemaking treatment of these costs.

E. Legal Name and Correspondence – Rules 2.1(a) and 2.1(b)

Southern California Edison Company (SCE) is an electric public utility organized and existing under the laws of the State of California. The location of SCE’s principal place of business is 2244 Walnut Grove Avenue, Post Office Box 800, Rosemead, California 91770. SCE’s attorneys in this matter are Jennifer Tsao Shigekawa and Larry R. Cope. Correspondence or communications regarding this Application should be addressed to:

Larry R. Cope
Attorney
Southern California Edison Company
P.O. Box 800
2244 Walnut Grove Avenue
Rosemead, California 91770
Telephone: (626) 302-2570
Facsimile: (626) 302-7740
e-mail: larry.cope@sce.com

To request a copy of this Application, please contact:

Case Administration
Southern California Edison Company
P.O. Box 800
2244 Walnut Grove Avenue
Rosemead, California 91770
Telephone: (626) 302-1063
Facsimile: (626) 302-3119
E-mail: caseadmin@sce.com

F. Organization and Qualification to Transact Business – Rule 2.2

A copy of SCE’s Certificate of Restated Articles of Incorporation, effective on March 2, 2006, and as presently in effect, certified by the California Secretary of State, was filed with the Commission on March 14, 2006, in connection with Application No. 06-03-020⁴⁹ and is incorporated herein by reference pursuant to Rule 2.2 of the Commission’s Rules of Practice and Procedure.

Certain classes and series of SCE’s capital stock are listed on a “national securities exchange” as defined in the Securities Exchange Act of 1934 and copies of SCE’s latest Annual Report to Shareholders and its latest proxy statement sent to its stockholders has been filed with the Commission.

G. Balance Sheet and Income Statement – Rule 3.2.(a)(1)

Appendix A to this Application contains copies of SCE’s balance sheet as of December 31, 2010, and income statement for the period ended December 31, 2010, the most recent period available.

⁴⁹ A.06-03-020 was filed on March 14, 2006, regarding approval of early transfer of Anaheim’s share of SONGS 2 and 3 to SCE.

H. Present and Proposed Rates – Rule 3.2(a)(2) and (a)(3)

The cost recovery mechanism proposal and the projected impact on rates are discussed in this Application in Sections V. K., VI. I, and VII. E, as well as in the supporting Testimony.⁵⁰

I. Description of SCE’s Service Territory and Utility System – Rule 3.2(a)(4)

Because this submittal is not a general rate application, this requirement is not applicable.

J. Summary of Earnings – Rule 3.2.(a)(5)

Rule 3.2(a)(5) requires:

A summary of earnings (rate of return summary) on a depreciated rate base for the test period or periods upon which applicant bases its justification for an increase.

SCE’s January 2011 Summary of Earnings is attached hereto as Appendix B.

K. Depreciation – Rule 3.2(a)

Because this submittal is not a general rate application, this requirement is not applicable.

L. Capital Stock and Proxy Statement – Rule 3.2(a)(8)

Because this submittal is not a general rate application, this requirement is not applicable.

M. Statement Pursuant to Rule 3.2(a)(10)

Rule 3.2(a)(10) requires the applicant to state whether its request is limited to passing through to customers “only increased costs to the corporation for the services or commodities furnished by it.” This Application seeks only to pass through to SCE’s customers the costs incurred by SCE in connection with its Energy Savings Assistance, CARE, and Cool Center programs.

⁵⁰ See Exhibit SCE-1, Section II. K. at pp. 87-88, Section III. I. at pp. 111-112, and Section IV. E. at pp. 120-121.

N. Service of Notice – Rule 3.2(b), (c) and (d)

As required by Rule 3.2(b), a notice stating in general terms the proposed increase in rates will be mailed to the designated officials of the State of California, and the cities and counties affected by the rate changes proposed in this Application as listed in Appendix C, attached.

Pursuant to Rule 3.2(c), notice will be published in a newspaper of general circulation in each county in SCE's service territory within which the rate changes would be effective. A list of cities and counties affected by the increase proposed in this Application is attached as Appendix C.

Finally, pursuant to Rule 3.2(d), notice will be furnished to customers affected by the proposed increase by including such notice with the regular bills mailed to those customers.

O. Index of Exhibits and Appendices to This Application

SCE's submissions in support of this Application include the following, which are incorporated herein by reference:

Appendices to Application

Appendix A	Balance Sheet and Income Statement
Appendix B	Summary of Earnings
Appendix C	List of Cities and Counties
Appendix D	Acronyms and Abbreviations

Exhibits to Application

Exhibit SCE-1	Testimony of Southern California Edison Company in Support of Its Application for Approval of Its Energy Savings Assistance, CARE, and Cool Center Programs and Budgets for Program Years 2012-2014
Exhibit SCE-2	Appendices to Testimony

P. Service List

The official service list has not yet been established in this proceeding. SCE is serving this Application and supporting Testimony on the service list established by the Commission for A.08-05-022, et al.⁵¹

IX.

CONCLUSION

Southern California Edison Company is now ready to proceed with its showing in support of this Application. WHEREOF, Southern California Edison Company respectfully requests that the Commission review this Application and expeditiously issue an order.

- (1) Approving its 2012-2014 Energy Savings Assistance Program plans, budgets and ratemaking as filed.
- (2) Approving SCE's Proposed CARE plans budgets and ratemaking as filed.
- (3) Approving SCE's Proposed Cool Center, plans, budgets and ratemaking as filed.

⁵¹ This was the service list used for service of the Assigned Commissioner's Ruling Providing Guidance Concerning the CARE Program and Energy Savings Assistance Program (Formerly and Generally Referred to as LIEE Program) and Related 2012-2014 Budget Applications.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

/s/ Erwin Furukawa

By: Erwin Furukawa
Senior Vice President

JENNIFER TSAO SHIGEKAWA
LARRY R. COPE

/s/ Larry R. Cope

By: Larry R. Cope

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

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May 16, 2011

VERIFICATION

I am an officer of the applicant corporation herein, and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this **12th day of May, 2011**, at Rosemead, California

/s/ Erwin Furukawa

By: Erwin Furukawa
Senior Vice President

SOUTHERN CALIFORNIA EDISON COMPANY
2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770

Appendix A

Balance Sheet and Income Statement

SOUTHERN CALIFORNIA EDISON COMPANY

BALANCE SHEET

MARCH 31, 2011

A S S E T S

(Unaudited)

(Millions of Dollars)

UTILITY PLANT:

Utility plant, at original cost	\$28,127
Less - Accumulated depreciation	(6,488)
	<u>21,639</u>
Construction work in progress	3,267
Nuclear fuel, at amortized cost	370
	<u>25,276</u>

OTHER PROPERTY AND INVESTMENTS:

Nonutility property - less accumulated depreciation of \$101	75
Nuclear decommissioning trusts	3,619
Other Investments	76
	<u>3,770</u>

CURRENT ASSETS:

Cash and cash equivalents	53
Receivables, less allowances of \$87 for uncollectible accounts	625
Accrued unbilled revenue	410
Inventory	328
Prepaid taxes	225
Derivative assets	77
Regulatory assets	407
Other current assets	101
	<u>2,226</u>

DEFERRED CHARGES:

Regulatory assets	4,450
Derivative assets	289
Other long-term assets	333
	<u>5,072</u>
	<u>\$36,344</u>

SOUTHERN CALIFORNIA EDISON COMPANY

BALANCE SHEET

MARCH 31, 2011

CAPITALIZATION AND LIABILITIES

(Unaudited)

(Millions of Dollars)

CAPITALIZATION:

Common stock	\$2,168
Additional paid-in capital	575
Accumulated other comprehensive loss	(24)
Retained Earnings	5,673
Common shareholder's equity	<u>8,392</u>
Preferred and preference stock not subject to redemption requirements	1,045
Long-term debt	7,627
	<u>17,064</u>

CURRENT LIABILITIES:

Short-term debt	200
Accounts payable	958
Accrued taxes	47
Accrued interest	118
Customer deposits	211
Derivative liabilities	215
Regulatory liabilities	778
Other current liabilities	482
	<u>3,009</u>

DEFERRED CREDITS:

Deferred income taxes	5,096
Deferred investment tax credits	117
Customer advances	112
Derivative liabilities	461
Pensions and benefits	1,851
Asset retirement obligations	2,508
Regulatory liabilities	4,733
Other deferred credits and other long-term liabilities	1,393
	<u>16,271</u>
	<u>\$36,344</u>

SOUTHERN CALIFORNIA EDISON COMPANY

STATEMENT OF INCOME

3 MONTHS ENDED MARCH 31, 2011

(Unaudited)

(Millions of Dollars)

OPERATING REVENUE	<u>\$2,232</u>
OPERATING EXPENSES:	
Fuel	76
Purchased power	508
Other operation and maintenance	784
Depreciation, decommissioning and amortization	344
Property and other taxes	77
Total operating expenses	<u>1,789</u>
OPERATING INCOME	443
Interest income	2
Other income	38
Interest expense - net of amounts capitalized	(111)
Other expenses	(13)
INCOME BEFORE INCOME TAX	<u>359</u>
INCOME TAX EXPENSE	<u>123</u>
NET INCOME	236
Less: Dividends on preferred and preference stock not subject to mandatory redemption	<u>14</u>
NET INCOME AVAILABLE FOR COMMON STOCK	<u><u>\$222</u></u>

Appendix B

Summary of Earnings

Southern California Edison
Summary of Earnings
2009 - 2011 GRC-Related Adopted Revenue Requirement ^{1/}
Thousands of Dollars

Line No.	Item	2009	2010		2011		Remove SONGS 2&3 Refueling & Maintenance Outage Rev. Req.	OOR Adjustment Rev. Req.	2011 Rev. Req.
		Rev. Req.	Multiplier	Rev. Req.	Multiplier	Rev. Req.			
1.	Base Revenues	4,829,742	1.0425	5,035,006	1.0435	5,254,029	(51,303)	(409)	5,202,317
2.	Expenses:								
3.	Operation & Maintenance	2,130,052							
4.	Depreciation	1,037,452							
5.	Taxes	723,783							
6.	Revenue Credits	(178,615)							
7.	Total Expenses	3,712,672							
8.	Net Operating Revenue	1,117,070							
9.	Rate Base	12,766,518							
10.	Rate of Return	8.75%							

^{1/} D.09-03-025

Includes one SONGS 2&3 refueling and maintenance outage for 2009 & 2010 and zero in 2011.

Appendix C

List of Cities and Counties

SOUTHERN CALIFORNIA EDISON COMPANY

Citizens or some of the citizens of the following counties and municipal corporations will or may be affected by the changes in rates proposed herein.

COUNTIES

Fresno	Kings	Orange	Tuolumne*
Imperial	Los Angeles	Riverside	Tulare
Inyo	Madera	San Bernardino	Ventura
Kern	Mono	Santa Barbara	

MUNICIPAL CORPORATIONS

Adelanto	Cudahy	Irwindale	Newport Beach	Santa Barbara
Agoura Hills	Culver City	La Canada Flintridge	Norco	Santa Clarita
Alhambra	Cypress	La Habra	Norwalk	Santa Fe Springs
Aliso Viejo	Delano	La Habra Heights	Ojai	Santa Monica
Apple Valley	Desert Hot Springs	La Mirada	Ontario	Santa Paula
Arcadia	Diamond Bar	La Palma	Orange	Seal Beach
Artesia	Downey	La Puente	Oxnard	Sierra Madre
Avalon	Duarte	La Verne	Palm Desert	Signal Hill
Baldwin Park	Eastvale	Laguna Beach	Palm Springs	Simi Valley
Barstow	El Centro	Laguna Hills	Palmdale	South El Monte
Beaumont	El Monte	Laguna Niguel	Palos Verdes Estates	South Gate
Bell	El Segundo	Laguna Woods	Paramount	South Pasadena
Bell Gardens	Exeter	Lake Elsinore	Perris	Stanton
Bellflower	Farmersville	Lake Forest	Pico Rivera	Tehachapi
Beverly Hills	Fillmore	Lakewood	Placentia	Temecula
Bishop	Fontana	Lancaster	Pomona	Temple City
Blythe	Fountain Valley	Lawndale	Port Hueneme	Thousand Oaks
Bradbury	Fullerton	Lindsay	Porterville	Torrance
Brea	Garden Grove	Loma Linda	Rancho Cucamonga	Tulare
Buena Park	Gardena	Lomita	Rancho Mirage	Tustin
Calabasas	Glendora	Long Beach	Rancho Palos Verdes	Twentynine Palms
California City	Goleta	Los Alamitos	Rancho Santa Margarita	Upland
Calimesa	Grand Terrace	Lynwood	Redlands	Vernon
Camarillo	Hanford	Malibu	Redondo Beach	Victorville
Canyon Lake	Hawaiian Gardens	Mammoth Lakes	Rialto	Villa Park
Carpinteria	Hawthorne	Manhattan Beach	Ridgecrest	Visalia
Carson	Hemet	Maywood	Rolling Hills	Walnut
Cathedral City	Hermosa Beach	McFarland	Rolling Hills Estates	West Covina
Cerritos	Hesperia	Menifee	Rosemead	West Hollywood
Chino	Hidden Hills	Mission Viejo	San Bernardino	Westlake Village
Chino Hills	Highland	Monrovia	San Buenaventura	Westminster
Claremont	Huntington Beach	Montclair	San Dimas	Whittier
Commerce	Huntington Park	Montebello	San Fernando	Wildomar
Compton	Indian Wells	Monterey Park	San Gabriel	Woodlake
Corona	Industry	Moorpark	San Jacinto	Yorba Linda
Costa Mesa	Inglewood	Moreno Valley	San Marino	Yucaipa
Covina	Irvine	Murrieta	Santa Ana	Yucca Valley

*SCE provides electric service to a small number of customer accounts in Tuolumne County and is not subject to franchise requirements.

Appendix D

Acronyms and Abbreviations

AC	Air Conditioner
AMI	Advanced Metering Infrastructure
ARRA	American Recovery and Reinvestment Act of 2009
C&I	Commercial & Industrial
CARE	California Alternate Rates for Energy
CBA	CARE Balancing Account
CBO	Community-Based Organization
CBT	Computer-Based Training
CCO	SCE's Customer Call Center
CFL	Compact Fluorescent Light
CHANGES	Community Help and Awareness with Natural Gas and Electricity Services
CLEO	Community Language Energy Outreach Program
CMHP	Comprehensive Mobile Home Program
C.O.L.	Conclusions of Law
Commission	California Public Utilities Commission
CPI	Consumer Price Index
CPP	Critical Peak Pricing
CPUC	California Public Utilities Commission
CSI	California Solar Initiative
D.	Decision
DCSD	California Department of Community Services & Development
DEER	Database for Energy-Efficient Resources
DMRI	Duplicate Measure Research Inquiry
DMS	Domestic Multiple Service
DR	Demand Response
DRA	Commission's Division of Ratepayer Advocates
DSM	Demand Side Management
EAF	Energy Assistance Fund
EM&V	Evaluation, Measurement & Verification
EMAPS	Web-based database used to process and track program activity
ERRA	Energy Resource Recovery Account
EUCA	Energy Upgrade California
FERA	Family Electric Rate Assistance
FERABA	FERA Balancing Account
FBO	Faith-Based Organization
F.O.F	Finding of Fact
GIS	Geographic Information System

Guidance Ruling	R.07-01-042, Assigned Commissioner's Ruling Providing Guidance Concerning the California Alternate Rates for Energy (CARE) Program and Energy Savings Assistance Program (Formerly and Generally Referred to as Low Income Energy Efficiency (LIEE) Program) and Related 2012-2014 Budget Applications, dated March 30, 2011
HAN	Home Area Network
HEES	Home Energy Energy Efficiency Survey Program
HUD	U.S. Department of Housing and Urban Development
HVAC	Heating, Ventilating, and Air Conditioning System
IDSM	Integrated Demand Side Management
IOU	Investor Owned Utility
IVR	Interactive Voice Response
Joint Utilities	SCE, PG&E, SoCal Gas, and SDG&E
kW	Kilowatt
kWh	Kilowatt hour
LADWP	City of Los Angeles Department of Water and Power
LATTC	Los Angeles Trade Technical College
LIEE	Low Income Energy Efficiency (now referred to as the Energy Savings Assistance Program)
LIEEPAM	Low-Income Energy Efficiency Programs Adjustment Mechanism
LifeLine	California LifeLine Telephone Program
LIHEAP	Low Income Home Energy Assistance Program
LIPPT	Low Income Public Purpose Test
LIRA	Low Income Rate Assistance
M&E	Measurement & Evaluation
MASH	Multi-family Affordable Solar Housing
ME&O	Marketing, Education & Outreach
MEU	Mobile Energy Unit
NEB	Non-Energy Benefit
NPV	Net Present Value
O.P.	Ordering Paragraph
O&M	Operations & Maintenance
PC	Personal Computer
PC _m	Modified Participant Cost Test
PCT	Programmable Communicating Thermostat
PG&E	Pacific Gas & Electric Company
PGC	Public Goods Charge
PIER	California Energy Commission's Public Interest Energy Research

PPPAM	Public Purpose Programs Adjustment Mechanism
PPPC	Public Purpose Programs Charge
PTR	Peak Time Rebate
RAP	Resource Action Programs®
RFP	Request for Proposal
RRM	Reporting Requirements Manual
SASH	Single Family Affordable Homes
SCE	Southern California Edison Company
SDG&E	San Diego Gas & Electric Company
SEER	Season Energy Efficiency Ratio (rating system used by the US Government to establish the efficiency level of cooling equipment)
SERA	Skumatz Economic Research Associates
SMS	Short Message Service
SNAP	USDA Supplemental Nutrition Assistance Program
SoCal Gas	Southern California Gas Company
SSI	Social Security Supplemental Security Income
Strategic Plan	California's Long-Term Energy Efficiency Strategic Plan, January 2010 Update
TANF	Temporary Assistance to Needy Families
TRC	Total Resource Cost
UCT	Utility Cost Test
VoIP	Voice Over Internet Protocol
VRU	Voice Response Unit
WE&T	Workforce Education & Training
WIC	USDA Women, Infants and Children Program

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commissioner's Rules of Practice and Procedure, I have this day served a true copy of **APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) FOR APPROVAL OF ITS CALIFORNIA ALTERNATE RATES FOR ENERGY (CARE), ENERGY SAVINGS ASSISTANCE, AND COOL CENTER PROGRAM and budgets FOR 2012-2014** on all parties identified in the attached service list(s).

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **16th day of May, 2011**, at Rosemead, California.

/s/ Henry Romero

Henry Romero
Project Analyst
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Ave.
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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Application of Southern California Edison)	
Company (U338-E) for Approval of its 2012-)	Application A.11-05-___
2014 California Alternate Rates for Energy)	
(CARE) and Energy Savings Assistance)	
Programs and Budgets.)	

SOUTHERN CALIFORNIA EDISON (U338-E) NOTICE OF AVAILABILITY

JENNIFER TSAO SHIGEKAWA
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Dated: **May 16, 2011**

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

Application of Southern California Edison)
Company (U338-E) for Approval of its 2012-) Application 11-05-____
2014 California Alternate Rates for Energy)
(CARE) and Energy Savings Assistance)
Programs and Budgets.)

SOUTHERN CALIFORNIA EDISON (U338-E) NOTICE OF AVAILABILITY

JENNIFER TSAO SHIGEKAWA
LARRY R. COPE

SOUTHERN CALIFORNIA EDISON COMPANY (SCE) hereby provides this Notice of Availability of its Application for Approval of its California Alternate Rates for Energy (CARE), Energy Savings Assistance, and Cool Center Programs and Budgets for 2012-2014 and related materials, including SCE-1, SCE-2, and any other workpapers or supporting documents will be made available upon request.

SCE is serving this Application and supporting Testimony on the service list established by the Commission for A.08-05-022, et al. SCE will provide a copy of the Application materials upon request. To request these materials, please direct your request to SCE as follows:

Cecilia Jones, Case Administrator Southern California Edison Company Post Office Box 800 2244 Walnut Grove Avenue Rosemead, California 91770 Telephone: (626) 302-3062 Email: case.admin@sce.com

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **SOUTHERN CALIFORNIA EDISON (U338-E) NOTICE OF AVAILABILITY** on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **16th day of May 2011**, at Rosemead, California.

/s/ Henry Romero

Henry Romero
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California Public
Utilities Commission

CPUC Home

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

PROCEEDING: A0805022 - PG&E - FOR APPROVAL

FILER: PACIFIC GAS AND ELECTRIC COMPANY

LIST NAME: LIST

LAST CHANGED: MAY 6, 2011

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