

Exhibit	31
CPUC Proceeding	A.11-05-017 et al
Sponsor/Witness	NCLC et al.
Date Ident.	2/15/2012
Recd.	2/15/2012
Kimberly H. Kim Administrative Law Judge	

Attachment A

SAN DIEGO GAS AND ELECTRIC RESPONSE TO NCLC
DATA REQUEST

ESAP/CARE NCLC_SDG&E_#1
SDG&E- A.11_05-020

NCLC Data Request # 1 Dated November 30, 2011
SDG&E Response to Question 3-1
Submitted: December 8, 2011

Question:

NCLC-SDG&E 3-1:

- (a) For tenants who live in public housing, does the Company seek to include any housing subsidy value when calculating the tenant's income and determining if the tenant is income-eligible for ESAP?

Response:

Yes, SDG&E includes the public housing subsidy to calculate income eligibility for the Energy Savings Assistance Program.

- (b) If the answer to 3-1(a) is "yes," please explain how the company determines the value, if any, of the housing subsidy received by a public housing tenant? Include at least one application from a federal housing tenant as an example of how this information is captured (deleting all personal/identifying information such as name, address, phone number, etc. that may be on the application).

Response:

Under the Energy Savings Assistance Program, tenants in public housing can provide an award letter for income documentation. The award letter must be current and include the customer name, the value of the award, and the period of time. The value of the housing subsidy is equal to the amount specified by the public housing tenant's supporting documentation provided, i.e. award letter.

SDG&E does not have information in its database to identify customers who were subject to housing subsidies, thus, it would be overly burdensome to try and find a customer for which a housing subsidy was used to determine income.

- (c) For tenants who live in properties benefiting from the low-income housing tax credit, does the Company seek to include any housing subsidy value when calculating the tenant's income and determining if the tenant is income-eligible for ESAP?

Response:

Yes, as mentioned above, the public housing subsidy is included in calculating income eligibility. However, there is no consideration of tax credits. Tax credits are outside the scope of the definition of income.

- (d) If the answer to 3-1(c) is "yes," please explain how the company determines the value, if any, of the housing subsidy received by a tenant living in a low-income housing tax credit property? Include at least one application from a tenant living in low-income housing tax credit property as an example of how this information is captured (deleting all personal/identifying information such as name, address, phone number, etc.).

Response:

See response to (b) and (c) above.

- (e) For tenants who live in project-based section 8 housing, does the Company seek to include any housing subsidy value when calculating the tenant's income and determining if the tenant is income-eligible for ESAP?

Response:

Yes, SDG&E includes the Section 8 housing subsidy to calculate income eligibility for the Energy Savings Assistance Program.

- (f) (f) If the answer to 3-1(e) is "yes," please explain how the company determines the value, if any, of the housing subsidy received by a tenant living in project-based section 8 housing? Include at least one application from a tenant living in project-based section 8 housing as an example of how this information is captured (deleting all personal/identifying information such as name, address, phone number, etc.).

Response:

See response to (b) above.

Person Responsible for the Response: Dan LaMar

SAN DIEGO GAS AND ELECTRIC RESPONSE TO NCLC
DATA REQUEST

ESAP/CARE NCLC_SDG&E_#1
SDG&E – A.11_05-020
NCLC Data Request # 1 Dated November 30, 2011
SDG&E Response to Question 3-2
Submitted: December 8, 2011

Question:

NCLC-SDG&E 3-2:

- (a) Does the company interpret D.08-11-031, pp. 29 -31 as having authorized the IOUs to allow households participating in certain housing assistance programs to be categorically eligible for ESAP?

Response:

SDG&E does not consider those households participating in housing assistance programs to be categorically eligible for Energy Savings Assistance Program.

D.08-11-031, at page 133, states:

“[T]he county-by-county structure of these public housing programs does not align with California’s statewide CARE and LIEE income requirements, and the IOUs have not been able to reach a consensus on how to address this problem. Although most or all extremely low income households qualify for LIEE and CARE, depending on county Area MI, low income and even very low income households may not qualify for CARE and LIEE.”

D.08-11-031, at page 135, states:

“[E]ach IOU should make a reasonable effort to differentiate between eligible and ineligible public housing residents for CARE and LIEE enrollment. Given the diverse county by county discrepancy; we will leave it to the IOU’s discretion how to do this in each of their service areas, but they shall not enroll ineligible customers in the programs.”

For participation in SDG&E’s Energy Savings Assistance Program, households participating in housing assistance programs must prove income eligibility.

- (b) If the answer to (a) is “yes,” which, if any, categories of households receiving public assistance has it treated as categorically eligible

Response:

The question is not applicable to SDG&E.

- (c) (See D. 08-11-031, p. 31, 1st paragraph). Has the company filed any Tier 2 Advice Letters or made any other filing at the Commission regarding “additional programs” that would be added to the list of other programs through which households can become categorically eligible for ESAP?

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Response:

No, SDG&E has not made any other filing at the Commission regarding “additional programs” that would be added to the list of other programs through which households can become categorically eligible for the Energy Savings Assistance Program.

- (d) If the answer to (c) is “yes,” please provide a copy of all such Tier 2 Advice Letters or other submissions.

Response:

The question is not applicable to SDG&E.

- (e) Relative to the company’s efforts to count the value of any housing subsidies as income in determining a household’s income-eligibility for ESAP, for each of the four housing programs listed below, please state which of those programs the company considers as providing cash or monetary assistance directly to the household:

- (i) public housing;
- (ii) low-income housing tax credit;
- (iii) section 8 housing voucher;
- (iv) project based section 8.

Response:

- (i) public housing;

SDG&E considers public housing as providing cash or monetary assistance to the household only if there is a subsidy, stipend, payment, or any other form of *income* awarded to the tenant as defined in General Order 153.¹

- (ii) low-income housing tax credit;

¹ General Order 153, Section 2.1.52 - “Total Household Income” – All revenues, from all household members, from whatever source derived, whether taxable or non-taxable, including, but not limited to: wages, salaries, interest, dividends, spousal support and child support, grants, gifts, allowances, stipends, public assistance payments, social security and pensions, rental income, income from self-employment and cash payments from other sources, and all employment-related, non-cash income.

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SDG&E does not consider a low-income housing tax credit as providing cash or monetary assistance to the household.

(iii)section 8 housing voucher;

SDG&E considers Section 8 housing vouchers as providing cash or monetary assistance to the household.

(iv)project based section 8.

SDG&E considers project-based Section 8 as providing cash or monetary assistance to the household only if there is a subsidy, stipend, payment, or any other form of *income* awarded to the tenant as defined in General Order 153.

Person Responsible for the Response: Dan LaMar

SOUTHERN CALIFORNIA GAS RESPONSE TO NCLC
DATA REQUEST

ESAP/CARE NCLC_SCG_#1
SCG - A.11_05-018

NCLC Data Request # 1 Dated November 30, 2011
SCG Response to Question 3-1
Submitted: December 8, 2011

Question:

NCLC-SCG 3-1:

- (a) For tenants who live in public housing, does the Company seek to include any housing subsidy value when calculating the tenant's income and determining if the tenant is income-eligible for ESAP?

Response:

Yes, SoCalGas includes the public housing subsidy to calculate income eligibility for the Energy Savings Assistance Program.

- (b) If the answer to 3-1(a) is "yes," please explain how the company determines the value, if any, of the housing subsidy received by a public housing tenant? Include at least one application from a federal housing tenant as an example of how this information is captured (deleting all personal/identifying information such as name, address, phone number, etc. that may be on the application).

Response:

Under the Energy Savings Assistance Program, tenants in public housing can provide an award letter for income documentation. The award letter must be current and include the customer name, the value of the award, and the period of time. The value of the housing subsidy is equal to the amount specified by the public housing tenant's supporting documentation provided, i.e. award letter.

SoCalGas does not have information in its database to identify customers who were subject to housing subsidies, thus, it would be overly burdensome to try and find a customer for which a housing subsidy was used to determine income.

- (c) For tenants who live in properties benefiting from the low-income housing tax credit, does the Company seek to include any housing subsidy value when calculating the tenant's income and determining if the tenant is income-eligible for ESAP?

Response:

Yes, as mentioned above, the public housing subsidy is included in calculating income eligibility. However, there is no consideration of tax credits. Tax credits are outside the scope of the definition of income.

- (d) If the answer to 3-1(c) is "yes," please explain how the company determines the value, if any, of the housing subsidy received by a tenant living in a low-income housing tax credit

ESAP/CARE NCLC_SCG_#1
SCG – A.11_05-018
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SCG Response to Question 3-1
Submitted: December 8, 2011

property? Include at least one application from a tenant living in low-income housing tax credit property as an example of how this information is captured (deleting all personal/identifying information such as name, address, phone number, etc.).

Response:

See response to (b) and (c) above.

- (e) For tenants who live in project-based section 8 housing, does the Company seek to include any housing subsidy value when calculating the tenant's income and determining if the tenant is income-eligible for ESAP?

Response:

Yes, SoCalGas includes the Section 8 housing subsidy to calculate income eligibility for the Energy Savings Assistance Program.

- (f) If the answer to 3-1(e) is "yes," please explain how the company determines the value, if any, of the housing subsidy received by a tenant living in project-based section 8 housing? Include at least one application from a tenant living in project-based section 8 housing as an example of how this information is captured (deleting all personal/identifying information such as name, address, phone number, etc.).

Response:

See response to (b) above.

Person Responsible for the Response: Yvonne Mejia

Southern California Edison Responses to NCLC Questions

ESAP/CARE

NCLC_SCE_A-11-05-017

Responses to Set One, Questions 1-2, 1-7, 1-8, 1-9, 1-12, 1-14, 1-15

NCLC-SCE 1-2(Application, p. 14; Testimony, p. 44)

(a) Do any of the segments identified in the Household Segmentation Study correspond to owners or tenants on multifamily housing?

Answer:

No, none of the segments correspond to owners or tenants on multifamily housing.

(b) Does SCE engage in any specific marketing or outreach efforts to owners or tenants in multifamily housing (see, for example, Application, p. 18, referencing “multifamily complexes”)? If so, please describe those efforts.

Answer:

SCE provides its service providers and outreach personnel with promotional material for use with owners/managers of rental properties. Upon identifying the property owner/manager, the outreach worker provides them with the material and through it presents the benefits to property owners/managers of participation in the program. SCE does not directly target property owners/managers through its marketing efforts for the Energy Savings Assistance Program. Instead, SCE targets all potentially eligible customers, in all dwelling types through its marketing and outreach efforts.

NCLC-SCE 1-7

(a) (Application, p. 28) Has the company done any analysis of the number of income-eligible multifamily properties, and the number of such properties actually served in any time period, that would back up the statement that the “owners and managers...have been less responsive to energy efficiency efforts?” Similarly, has SCE compared the estimated penetration rate of its ESA program among income-eligible multi-family properties to the penetration rate among other income-eligible residential buildings? Please provide any reports, analyses, calculations or memos regarding the number of income eligible multifamily properties; the number actually served; and the penetration rates of SCE’s ESAP services among multifamily and other residential properties.

Answer:

SCE does not have available data on the number of income-eligible multifamily properties and the number of properties served. SCE tracks customers at the meter / sub meter level and does not aggregate them to the property level for ESA tracking and reporting. SCE has reported an estimate of eligible homes, and treated homes in 2010 by single family, multi family (5 or more households) , and mobile homes and has provided estimates of homes that will be treated in 2012-2014 in these same categories. This information can be found in Attachment A-4 to SCE’s testimony.

(b) (Testimony, p. 58) Please provide the data underlying the statement that the “penetration rate of multi-family dwelling units treated by [ESAP] is proportionate to the number of multi-family units occupied by eligible low-income customers.” To the extent available, and not already provided in response to (a) above, include in your answer: (1) the total number of low-income units SCE estimates were in its service territory (including multifamily units), for 2010 or other recent year; (2) the total number of low-income units served in 2010 or other recent year [but same year as in part (b)(1)]; (3) the number of low-income multifamily units SCE estimates were in its service territory, for 2010 or other recent year; and (4) the number of multifamily low-income units served in 2010, or other recent year [but same year as in part (b)(1)].

Answer:

Over the past 5 years, SCE’s data indicates 23% of treated households have been multifamily (5 or more units). SCE estimates that 29% of its ESA eligible households are multifamily (5 or more units). The eligible units are provided in Attachment A-4 to SCE’s testimony.

NCLC-SCE 1-8

(a) (Application, p. 29) When will the EUCA Whole Building Performance (“WBP”) program for multifamily properties be fully rolled out and available to customers?

Answer:

SCE anticipates full roll-out of this program in third quarter of 2012.

(b) Please explain whether the EUCA WBP program will offer multifamily buildings “one stop shopping?” If “yes,” please explain in detail how the company will coordinate the delivery of energy efficiency services to the building owner and to the tenants so as to minimize the need for those owners or tenants to engage in multiple initial contacts with the company and minimize the need for multiple applications or requests to be filed?

Answer:

SCE is working with its trade partners, contractors, call center, and customer service representatives to coordinate EE and ESAP services to minimize the need for multiple contacts and multiple applications. The intention is to identify a single point of contact (POC) at the utility that can guide multi-family (MF) building owners through the process and explain the various opportunities available. The role of the POC is to walk MF building owners through the application and program process to ensure they take full advantage of all available programs and services.

(c) (Testimony, p. 59) Please provide any written plans, whether draft or final, regarding the Energy Upgrade California Whole Building Performance Program. Also, please explain whether separate applications for assistance will still need to be made by the property owner and the individual tenants in multifamily buildings.

Answer:

SCE’s Statewide CalSPREE program implementation plan and corresponding sub-programs are currently available at <http://eega.cpuc.ca.gov/Default.aspx>

Yes, the EUC is designed for MF building owners and as such EUC applications are designed to be completed by owners and not tenants. ESAP is designed to serve individual dwellings and as such each tenant must complete and sign an ESAP application. Therefore, both the owners and the individual tenants will be required to fill out separate applications for the separate programs.

NCLC-SCE 1-9

(Application, p. 31) Please describe the components of the Utility Cost Test, the Modified Participant Cost Test, and the Total Resource Cost (TRC) Test.

Answer:

Below are the components that make up each of the cost-effectiveness tests used to evaluate the Energy Savings Assistance programs:

Total Resource Cost (TRC) Test

The Total Resource Cost Test measures the net costs of a demand-side management program as a resource option based on the total costs of the program, including both the participants' and the utility's costs.

Benefits

The benefits are determined as the net present value of the avoided supply costs, the reduction in transmission, distribution, generation, and capacity costs valued at marginal cost for the periods when there is a load reduction.

Costs

The cost captures all net present value costs incurred by the utility and the participants plus the increase in supply costs for the periods in which load is increased. Thus all equipment costs, installation, operation and maintenance, cost of removal (less salvage value), and administration costs, no matter who pays for them, are included in this test.

Utility Cost Test (UCT)

The Utility Cost Test also known as the Program Administrator Cost Test measures the net costs of a demand-side management program as a resource option based on the costs incurred by the program administrator (including incentive costs) and excluding any net costs incurred by the participant. The benefits are similar to the TRC benefits. Costs are defined more narrowly.

Benefits

The benefits are determined as the net present value of the avoided supply costs, the reduction in transmission, distribution, generation, and capacity costs valued at marginal cost for the periods when there is a load reduction.

Costs

The cost captures all net present value costs incurred by the utility, the incentives paid to the customers, and the increased supply costs for the periods in which load is increased. Utility program costs include initial and annual costs, such as the cost of utility equipment, operation and maintenance, installation, program administration, and customer dropout and removal of equipment (less salvage value).

Modified Participant Cost Test

Benefits

The benefits are determined as the net present value of the avoided supply costs, the reduction in transmission, distribution, generation, and capacity costs valued at marginal cost for the periods when there is a load reduction.

In addition, there are adders for non-energy benefits, such as air quality and comfort.

Costs

The cost captures all net present value costs incurred by the utility and the participants plus the increase in supply costs for the periods in which load is increased. Thus, all equipment costs, installation, operation and maintenance, cost of removal (less salvage value), and administration costs, no matter who pays for them, are included in this test.

NCLC-SCE 1-12

(Testimony, p. 14)

Regarding the projected energy savings:

- (a) Provide the average savings/per home treated for each year 2009 and 2010, and the estimates of the average per home savings anticipated for 2011, 2012, 2013 and 2014. Please provide the answer in kWh, and clearly state whether those savings are cumulative [over the life of the installed measures], or annual savings expected to be achieved in each year after the measures are installed.

Answer:

SCE in its LIEE and CARE Annual Reports, filed with the Commission on May 1st each year, provides total energy savings and homes treated for 2009 and 2010 in LIEE Table 2. The savings per home can be easily determined by dividing the total energy savings by the number of homes treated. The energy savings has been forecast for 2011 through 2014 in Attachment A-2 in our Low Income Programs testimony. The homes treated and projected for 2011 through 2014 are available in Attachment A-4 to our Low Income Programs testimony. The savings referenced in this response are annualized.

- (b) Provide the same information as requested in (a), but for multifamily buildings only.

Answer:

As indicated in the response to question 7A, SCE does not track ESA data at the multifamily property level.

- (c) For each year 2008 to 2010, please provide the number of multifamily buildings, and the number of units in those buildings, that received ESAP services, as well as the total number of residential units that received ESAP services.

Answer:

As indicated in the response to question 7A, SCE does not track ESA data at the multifamily property level. The multifamily unit data is tracked and reported in LIEE Table 8 of the LIEE and CARE Annual Reports for 2009 and 2010 and in Table TA3 of the LIEE Annual Report for the 2008 program year. Table TA3 includes information by housing type and heating source.

NCLC-SCE 1-14

(Testimony, p. 17) Please explain whether, and how, SCE considers “all social welfare program benefits” in determining income eligibility. In particular, does SCE attempt to calculate the value of social benefits that are not provided in the form of cash, such as housing subsidies? Please provide all manuals or written guidance made available to those who actually perform the income verification task (SCE employees, contractors or subcontractors) which explain how to count the value of social benefits, and that list or define which social benefits are included.

Answer:

For the purposes of determining Program eligibility, all income is considered, from all household members, from all sources listed in Table 2-2, whether taxable or non-taxable income, including (but not limited to) wages, salaries, interest, dividends, child support, spousal support, disability or veteran’s benefits, rental income, Social Security, pensions and all social welfare program benefits before any deductions are made. Table 2-2 indicates the specific items included as income for the purpose of determining eligibility for the LIEE program.

NCLC-SCE 1-15

(Testimony, p. 19-20) Does SCE develop separate estimates, part from the overall estimate of eligible households, for the number of ESAP-eligible multifamily buildings and number of income-eligible units within those buildings? If so, please provide the most recent estimates and all back-up documentation.

Answer:

No, SCE estimates are based on the overall eligible households.

Southern California Edison Responses to NCLC Questions

ESAP/CARE
NCLC_SCE_A-11-05-017
Responses to Set Two, Questions 2-1, 2-4

NCLC-SCE 2-1:

- (a) Regarding the company's response to NCLC-SCE 1-1 (questions reproduced immediately below) and NCLC-SCE 1-14, is it the company's position that it provides no documents to its employees, contractors or subcontractors regarding income documentation other than the Policy and Procedures Manual?
- (b) Regardless of the documents provided, please answer, yes or no, whether the company currently counts the value of housing subsidy when calculating income. If "yes," please explain how the company (or its agents) determines the value of housing subsidy, separately for each of these types of housing subsidy: public housing tenants, low-income housing tax credit tenants, voucher tenants, and project-based section 8 tenants. Include with your answer any worksheets or intake forms that the company, its employees, contractors or subcontractors use to capture and/or calculate the value of housing subsidy.

[NCLC-SCE 1-1 reproduced:] (Application, p. 12) Please provide any documents that are provided to employees, contractors, or subcontractors engaged in income verification and that explain the sources and types of income that are counted in determining whether the customer is at or below 200% of the federal poverty level.

Answer:

- (a) As part of its Home Assessment Training Workshop, SCE provides participants with a thorough review, along with instructor-led learning exercises, of the policies and procedures related to calculating and documenting household income. In addition, workshop participants are provided with a Participant Guide that is theirs to keep. The Participant Guide contains all of the information provided during the Home Assessment Training Workshop, including the list of acceptable income documents detailed in the LIEE Statewide Policies and Procedures Manual. Attached is the section of the Participant Guide that refers to the income documentation.

Any changes to the policies and procedures are communicated by service providers through web based instructor-led sessions or memos sent via electronic mail. For reference purposes, the memos are also made available for download to all service providers through SCE's Energy Management Assistance Program database.

- (b) Outreach staff will ask the customer for any and all sources of household income and if they are participating in any assistance programs. If a household indicates it is receiving or is identified by outreach staff as receiving the housing subsidy in the form of monies paid directly to the applicant, the value of the subsidy is documented (see attached ESA Enrollment Form), and will be counted toward household income.

An exception to the above would be Federal Public Housing Assistance/Section 8, which D.08-11-031 authorized the IOUs to allow participating households to be categorically eligible for the Energy Savings Assistance Program.

As stated in D.08-11-031, Ordering Paragraph 64, "Each IOU should make a reasonable effort to differentiate between eligible and ineligible public housing residents for CARE and LIEE enrollment and only enroll eligible public housing residents in the programs."

When working directly with the applicant, to ensure that the public housing household meets the ESA Program's income requirements, applicants must provide the following:

- A copy of the Federal Public Housing Assistance/Section 8 acceptance letter, which will list the income used by the household to enroll in Federal Public Housing Assistance/Section 8.

In the event that the household income listed on the acceptance letter exceeds the program requirements, the household will not be enrolled in the ESA Program.

NCLC-SCE 2-4

Does the company have any knowledge of whether the Lifeline program counts the value of housing subsidy as income? If "yes," please describe the extent of the company's knowledge or experience, and provide any documents upon which the answer is based.

Answer:

SCE does not have knowledge of all income sources considered in applying for the Lifeline Program, this includes the value of housing subsidies. SCE is aware however that, per D.08-11-031 the utilities were directed to include all programs that LifeLine includes for categorical eligibility in LIEE/CARE categorical eligibility.

Southern California Edison Responses to NCLC Questions

**ESAP/CARE
NCLC_SCE_A-11-05-017
Responses to Set Three, Questions 3-1, 3-2**

Southern California Edison
ESAP-CARE 2012-2014 A.11-05-017

DATA REQUEST SET A.11-05-017 ESAP NCLC-SCE-003

To: NCLC Prepared by: Mauricio Blanco Title: Manager Dated: 11/30/2011

NCLC-SCE 3-1:

In request NCLC-SCE 2-1 (b), NCLC asked: " *... please explain how the company (or its agents) determines the value of housing subsidy, separately for each of these types of housing subsidy: public housing tenants, low-income housing tax credit tenants, voucher tenants, and project-based section 8 tenants. "*

In response to this request 3-1, please reply separately and completely to each question below:

3-1

- (a) For tenants who live in public housing, does the Company seek to include any housing subsidy value when calculating the tenant's income and determining if the tenant is income-eligible for ESAP?
- (b) If the answer to 3-1(a) is "yes," please explain how the company determines the value, if any, of the housing subsidy received by a public housing tenant? Include at least one application from a federal housing tenant as an example of how this information is captured (deleting all personally identifying information such as name, address, phone number, etc. that may be on the application).
- (c) For tenants who live in properties benefiting from the low-income housing tax credit, does the Company seek to include any housing subsidy value when calculating the tenant's income and determining if the tenant is income-eligible for ESAP?
- (d) If the answer to 3-1(c) is "yes," please explain how the company determines the value, if any, of the housing subsidy received by a tenant living in a low-income housing tax credit property? Include at least one application from a tenant living in low-income housing tax credit property as an example of how this information is captured (deleting all personally identifying information such as name, address, phone number, etc.).
- (e) For tenants who live in project-based section 8 housing, does the Company seek to include any housing subsidy value when calculating the tenant's income and determining if the tenant is income-eligible for ESAP?
- (f) If the answer to 3-1(e) is "yes," please explain how the company determines the value, if any, of the housing subsidy received by a tenant living in project-based section 8 housing? Include at least one application from a tenant living in project-based section 8 housing as an example of how this information is captured (deleting all personally identifying information such as name, address, phone number, etc.).

Response to Question 01: During the ESAP enrollment process, outreach staff will ask the customer for any and all sources of household income and if they are participating in any assistance programs. If a household indicates it is receiving or is identified by outreach staff as receiving a housing subsidy, in the form of cash, check, or credit, the value of the subsidy is documented and will be counted toward household income.

Answer

- (a) -Yes, if a household indicates that it is receiving or is identified as receiving the housing funds directly in the form of cash, check, or credit, the value of the subsidy is documented, and will be counted toward household income.
- (b) -The outreach workers obtain a copy of the acceptance letter, which will typically list the income and subsidy amount.
- (c) -No, currently tax credits are not listed as an income source in the statewide policies and procedures manual.
- (d) -N/A
- (e) -Yes, if the subsidy is provided directly to the applicant in the form of cash, check, or credit.
- (f) -When working directly with the applicant, the applicants provide a copy of the Federal Public Housing Assistance/Section 8 acceptance letter, which list the income and subsidy amount.

Southern California Edison
ESAP-CARE 2012-2014 A.11-05-017

DATA REQUEST SET A.11-05-017 ESAP NCLC-SCE-003

To: NCLC Prepared by: Mauricio Blanco Title: Manager Dated:
11/30/2011

NCLC-SCE 3-2:

In response to NCLC-SCE 2-3, which asked whether the company (in accordance with section 3.5.31 of O. 08-11-031) had "sought to add any additional state or federal programs that would categorically qualify a household for ESAP, the company stated that it "has not formally requested any additional state or federal programs be classified as categorical."

In response to NCLC-SCE 2-1 (b), the company responded: "If a household indicates it is receiving ... the housing subsidy in monies paid directly to the household, the value of the subsidy is documented ... and will be counted toward household ... An exception to the above would be Federal Public Housing Assistance/Section 8, which 0.08-11-031 authorized the IOUs to allow participating households to be categorically eligible for the Energy Savings Assistance Program."

In response to this request 3-2, please reply separately and completely to each question below:

3-2

- (a) Is it the company's position that 0.08-11-031 authorized the IOUs to allow households participating in certain housing assistance programs to be categorically eligible for ESAP, without having to file a Tier 2 Advice Letter or in any other manner advising the Commission or seeking its approval?
- (b) If the answer to "a" is "yes," which housing programs does the company believe now qualify a household for categorical eligibility, in accordance with O. 08-11-031?
- (c) When the company stated in the answer to NCLC 2-I(b), quoted above, that "Federal Public Housing Assistance/Section 8 Housing" households are "categorically eligible" for ESAP, does that mean that "customers who can provide documents proving participation in ... [those housing] programs do not need to provide additional income documentation in order to qualify for enrollment" [see O. 08-11-031, p. 29] in ESAP, or does SCE still require proof of income from these households?
- (d) Is it the company's position, as implied by the response to NCLC-SCE 2-I(b) quoted above, that "the housing subsidy [must be received] in monies paid directly to the household" in order for the value of the housing subsidy to be counted as income by SCE?
- (e) For each of the four housing programs listed below, please state which of those programs the company considers as providing "monies paid directly to the household" (as distinct from programs that provide the assistance to the property owners):
- (i) public housing;
 - (ii) low-income housing tax credit;
 - (iii) section 8 housing voucher;
 - (iv) project based section 8.

Answer

(a) SCE follows the list of Categorical Programs identified in the 2010 LIEE Statewide Policies and Procedures Manual, Chapter 2, Section 2.2.3.2 Categorical Eligibility. In 0.08-11-031, the Commission explains the challenges of allowing public housing and Section 8 participants to be categorically enrolled in ESAP and directs the IOUs not to enroll any ineligible customers in the program (Section 15 Eligibility of

Public Housing Tenants for CARE/LIEE, p. ,133) as later stated in Ordering Paragraph 64, it states "Each IOU should make a reasonable effort to differentiate between eligible and ineligible public housing residents for CARE and LIEE enrollment and only enroll eligible public housing residents in the programs. We grant the IOUs discretion how to do this in each of their service areas. "

(b) Income eligible customers participating in Federal Public Housing/Section 8 can be categorically enrolled in ESAP. In the event that the household income is determined to exceed program requirements, the household will not be enrolled in the ESA Program.

(c) When working directly with the applicant, to ensure that the public housing household meets the ESA Program's income requirements, applicants must provide the following:

A copy of the Federal Public Housing Assistance/Section 8 acceptance letter, which will list the income and subsidy amounts. If the household's income meets the ESAP income criteria, no additional documents are required.

In the event that the amounts determined exceed program requirements, the household will not be enrolled in the ESA Program.

(d) If the customer receives the subsidy funds directly in the form of cash, check, or credit the value of the housing funds are counted towards income.

(e) SCE has not considered each individual housing subsidy program. SCE has informed its contractors that they should consider any and all household income.

(i) Depending on the type of public housing, the customer mayor may not receive the subsidy funds directly in the form of cash, check, or credit.

(ii) Currently tax credits are not listed as an income source in the statewide policies and procedures manual.

(iii) The customer receives the subsidy funds directly in the form of cash, check, or credit.

(iv) If the customer receives the subsidy funds directly in the form of cash, check, or credit then SCE would consider this subsidy to be income.

NCLC Questions to PG&E

Set One: Questions 1-2, 1-3, 1-7, 1-8, 1-9, 1-10, 1-16, 1-19, 1-20

NCLC-PGE 1-2: (Application, pp. 1 -2)

Regarding the 375,000 homes to be treated 2012-2014:

(a) provide any estimate of the average savings/per home (in kWh and/or therms, as applicable; clearly state whether those savings are cumulative [over the life of the installed measures], or annual savings) expected to be achieved in each year 2012, 2013 and 2014; (b) comparable average savings/home data for the years 2009, 2010, and 2011.

(b) provide the number of multifamily homes that the company expects to treat each of the three years. In your answer, please explain whether each unit in a multifamily building that receives service is counted as one "home."

(c) For each year 2008 to 2010, please provide the number of multifamily buildings, and the number of units in those buildings, that received ESAP services.

Answer

- a) PG&E did not estimate the average savings/per home.
- b) PG&E expects to treat 18,004 MF units in 2012, and 21,686 each in 2013 and 2014, as shown in Application Table A-4. Each unit in a multifamily building that receives ESA Program services is counted individually as one home, as required for CPUC reporting.
- c) The number of multifamily buildings treated each year is not known, as PG&E does not record or report information in this way. PG&E treats and reports individual households, and does not count buildings. PG&E also does not know how many units are in multifamily buildings, since program information is not tracked this way. However the number of individual households treated each year that are classified as multi-family dwellings is filed in L1EE Table 4 in PG&E's Annual Reports. (Note that dwellings reported as multifamily households are in buildings having 5 or more units, as described in Answer 22.) As reported in Table L1EE-8 in PG&E's Low Income Programs Annual Reports for 2009 and 2010, in 2009, PG&E treated 12,604 multifamily dwellings, and in 2010, PG&E treated 21,822 multifamily dwellings.

NCLC-PGE 1-3 (Testimony, p. 1-12) Does PG&E develop separate estimates, part from the overall estimate of eligible households, for the number of ESAP-eligible multifamily buildings and number of income-eligible units within those buildings? If so, please provide the most recent estimates and all back-up documentation and documentation.

Answer

No, PG&E does not develop separate estimates for the number of ESA Program-eligible multifamily buildings. Nor does PG&E develop estimates of the number of income-eligible units within particular buildings. The ESA Program counts individual customer households. These may be single family homes, multifamily homes, or mobile homes.

NCLC-PGE 1-7 (Application, p. 3) Please provide all available detail regarding any pilot program to address the needs of the low-income multi-family housing sector. Also please explain

why the company is considering such a pilot.

Answer

PG&E proposed no specific pilots in its 2012-2014 ESA Program Application. However, PG&E described a strategy to coordinate different program options available to multifamily building owners and operators (including ESA Program options) to make it easier for multifamily building owners and operators to participate in PG&E programs available to them.

NCLC-PGE 1-8 (Application, p. 3) Regarding the statement that the company takes a "whole house" approach:

Assuming PG&E does not provide heating or hot water system repair or replacement in tenanted multifamily properties (as alluded to on p. 9 of the Application), due to prior Commission decisions, and assuming that the Commission were to consider revising its policy so as to allow such treatment, does PG&E have any objection, whether on cost-benefit or other grounds, to

including heating and hot water measures among the measures available for tenanted multifamily properties? If so, please explain any objections or concerns.

Answer

The ESA Program has a finite budget which PG&E's budget Application estimated by CPUC reporting line items. The reason for limiting furnaces and water heaters to homeowners was to stretch limited budgets to make the program available to more customers who have no other means to get these measures. Landlords are required under CA law to provide heat and hot water to their CA rental properties, and a decision was made by the Commission several years ago to not subsidize landlords for measures that they were required to provide.

PG&E notes that this decision to limit furnaces and water heating to homeowners is not targeted to exclude multi-family properties, as many renters in PG&E's service area live in single-family housing and are also precluded from receiving furnaces and water heaters under the ESA Program.

PG&E would comply with any CPUC requirements for the ESA Program. However, providing furnaces and hot water heaters to all rental units would significantly increase the number of these measures that would be eligible under the ESA Program, potentially greatly increasing the overall budget required. The low income energy efficiency program is funded by all ratepayers through their bills, including low income customers. PG&E proposed what it believes to be a prudent ESA Program budget balancing the needs of its low income customers with the rate impact to all customer classes. PG&E would explore all budgeting options if the ESA Program criteria changed—including limiting the total number of households we proposed to treat-in order to maintain the budget levels we proposed in our ESA Program Application.

NCLC-PGE 1-9 (Application, p. 4) Please explain how PG&E determines whether total household income in tenanted multifamily properties is equal to or less than 200 percent of the Federal Poverty Guidelines. Include in your answer:

(a) Who carries out this task: company employees, contractors, subcontractors? If contractors or subcontractors carry out this work, please explain the qualifications and experience that PG&E requires of

contractors who carry out this work.

(b) Must 100% of the tenants be income eligible in order for the building to receive services? If not, please explain the circumstances in which less than 100% of the tenants need to be income eligible for the building to receive services.

Answer

PG&E qualifies each unit individually, with the tenant household, the same way it does for single family or mobile home dwelling households.

- a) This task is carried out by the sub-contracted ESA Program implementers. Each sub contractor employee implementing the ESA Program in the field must attend and pass PG&E training. Field workers are subject to quality assurance ride-alongs and records checks by both PG&E's program administrator and PG&E.
- b) No, each individual unit is eligible and treated independently. PG&E's ESA Program does not treat building common areas.

NCLC-PGE 1-10 (Testimony, p. 1-4) Please provide any available written documents that more fully explain:

- (a) How the ESAP and EUCA programs will be coordinated, included how, from the building owner/customer's perspective, the coordinated programs will operate as a "turn-key or one-stopshop-service" (p. 1.4, l. 32 -33).
- (b) Please also explain, and provide any available written documentation, of how services will be coordinated in buildings that include individual income-eligible tenants who pay at least some of their energy bills, non-income eligible tenants who pay at least some of their energy bills, and building owners who are responsible for some of the energy bills.
- (c) To the extent not already answered in response to (a) or (b), which program (ESA or EUCA) will offer the single point of contact for owners of multifamily properties?

Answer

- a) This level of detail is not yet available and the program design is still being explored.
- b) This level of detail is not yet available and the program design is still being explored.
- c) This level of detail is not yet available and the program design is still being explored.

NCLC-PGE 1-16 (Testimony, p. 1-22 to 1-27) Please describe any leveraging, marketing, partnership and coordination activities in which PG&E participates that specifically target multifamily building owners or tenants in those buildings.

Answer

ESA Program outreach staff currently sends lists of large multifamily buildings to subcontractors in order for them to contact property managers for large-scale enrollments. PG&E is also evaluating the feasibility of creating a new webpage to serve as a comprehensive resource for property owners and managers looking to make energy efficiency improvements to their buildings. This site would include information

about the ESA Program, rebates, solar programs and other offerings.

PG&E's ESA Program is working with its core Energy Efficiency program teams to propose a coordinated project addressing the specific needs of the low income multifamily housing sector. Now that the Energy Upgrade California (EUCA) program has launched, and the EUCA multi-family program is under development, the timing is right to develop a project targeted at multi-family buildings. The project being developed would leverage funding from various sources to assess and provide energy saving opportunities through building measures that are not being provided with ESA Program funding.

A participating multifamily building could be assessed for whole building energy efficiency upgrade opportunities (such as boilers and windows). The ESA Program would pay for prescriptive ESA Program measures available to income-qualified households, the same as they would receive currently. For the other parts of the building, including households that are not income-qualified and common areas, the EE programs, including Energy Upgrade California, would be the mechanism used to provide a combination of deemed and performance rebates (when available) based on the measures and services provided, as well as the anticipated performance of the upgrades.

Interactions between the various EE and ESA Program services would be largely transparent to the building owner, as the utility would provide a turn key or one-stopshop service. Energy Upgrade California and ESA Program staff and installers will be trained on requirements of both programs as feasible to provide more comprehensive services to qualified dwelling units.

NCLC-PGE 1-19 (Testimony, p. 1-31) Please provide any current documents that describe the multifamily component of EUCA, even if those documents or plans are subject to further development and change.

Answer

This level of detail is not yet available and the program design is still being explored.

NCLC-PGE 1-20 (Testimony, p. 1-46, 1. 1 -16)

(a) Has PG&E had any discussions with CSD, or with any party, regarding recent changes in the Weatherization Assistance Program (WAP) [announced in WAP Notice 10-15, <http://waptac.org/dataJfiles/website/docs/government/guidance12010/wpn%201015%20revised.pdf>], that allow state W AP agencies such as CSD to determine that certain multifamily buildings are automatically income-eligible for W AP services because they are on a list of buildings already designated by the Department of Housing and Urban Development (HUD) as income-eligible? If "yes," please summarize the content of those discussions?

(b) Is PG&E willing to consider the use of the HUD list of income-eligible buildings to facilitate the offering of ESAP services to those properties and the tenants in those buildings?

Answer

a) PG&E has had not specific discussions regarding recent WAP changes. However, PG&E is aware that there have been recent changes through conversations with CSD, the other utilities, and DOE.

b) PG&E is always willing to consider using relevant, verifiable data that matches ESA Program criteria when the CPUC agrees.

NCLC Questions to PG&E
Set Two: Questions 2-2, 2-3, 2-4

NCLC-PGE 2-2 Does the company have any knowledge of whether the Lifeline program counts the value of housing subsidy as income? If "yes," please describe the extent of the company's knowledge or experience, and provide any documents upon which the answer is based.

Answer

No. PG&E does not know whether the life line program counts the value of the housing subsidy in calculating income. However, PG&E believes that the life line is based on customers' reportable income to the IRS.

NCLC-PGE 2-3 Are there any circumstances under which the company provides ESAP-funded services to an owner of multifamily rental property, whether for common heating or hot water systems, electrical usages in common hallways or common areas, to the building envelope, or otherwise? If "yes," please describe those circumstances.

Answer

No. PG&E does not provide funding to owners of multifamily structures for energy efficiency installations. The assistance to date must be provided directly to the customer under the ESA program.

NCLC-PGE 2-4 Please provide a copy of the company's most recent studies or evaluations of the cost-effectiveness of any measures related to heating and hot water systems in one-to-four unit housing, or in multifamily housing, including but not limited to complete replacements; clean-outs/tune-ups; wrapping of pipes or tanks; installation or adjustment of system controls; thermostatic radiator valves; variable speed furnace fans; etc.

Answer

PG&E has not prepared any such analysis in the ESA program.

NCLC Questions to PG&E
Set Three: Questions 3-1, 3-2

NCLC-PGE 3-1 (a) For tenants who live in public housing, does the Company seek to include any housing subsidy value when calculating the tenant's income and determining if the tenant is income-eligible for ESAP?

(b) If the answer to 3-1(a) is "yes," please explain how the company determines the value, if any, of the housing subsidy received by a public housing tenant? Include at least one application from a federal housing tenant as an example of how this information is captured (deleting all personal/identifying information such as name, address, phone number, etc. that may be on the application).

(c) For tenants who live in properties benefiting from the low-income housing tax credit, does the Company seek to include any housing subsidy value when calculating the tenant's income and determining if the tenant is income-eligible for ESAP?

(d) If the answer to 3-1 (c) is "yes," please explain how the company determines the value, if any, of the housing subsidy received by a tenant living in a low-income housing tax credit property? Include at least one application from a tenant living in low-income housing tax credit property as an example of how this information is captured (deleting all personal/identifying information such as name, address, phone number, etc.).

(e) For tenants who live in project-based section 8 housing, does the Company seek to include any housing subsidy value when calculating the tenant's income and determining if the tenant is income-eligible for ESAP?

(f) If the answer to 3-1(e) is "yes," please explain how the company determines the value, if any, of the housing subsidy received by a tenant living in project-based section 8 housing? Include at least one application from a tenant living in project-based section 8 housing as an example of how this information is captured (deleting all personal/identifying information such as name, address, phone number, etc.).

Answer

(a) It is PG&E's policy to include housing subsidies as a component of customer income as per table 2-2 of the Statewide Low Income Energy Efficiency Program Policy and Procedures Manual.

(b) As per table 2-3 of the Statewide Low Income Energy Efficiency Program Policy and Procedures Manual, the appropriate documentation for calculating the value of a housing subsidy is the award letter. PG&E is unable to identify and provide an application from a federal housing tenant at this time as an example of how this information is captured, as PG&E does not database either income source documentation (such as federal housing subsidy award letter) or housing type (such as federal housing) as searchable fields in the application.

(c) PG&E follows the policies set in the Statewide Low Income Energy Efficiency Program Policy and Procedures Manual and calculates each tenant's income using those guidelines.

(d) Please see answer to 3-1(b) above.

(e) PG&E follows the policies set in the Statewide Low Income Energy Efficiency Program Policy and Procedures Manual and calculates each tenant's income using those guidelines.

(f) Please see answer to 3-1 (b) above

NCLC-PGE 3-2 (a) Does the company interpret 0.08-11-031, pp. 29 -31 as having authorized the IOUs to allow households participating in certain housing assistance programs to be categorically eligible for ESAP?

(b) If the answer to (a) is "yes," which, if any categories of households receiving public assistance has it treated as categorically eligible?

(c) (See 0.08-11-031, p. 31, 1st paragraph). Has the company filed any Tier 2 Advice Letters or made any other filing at the Commission regarding "additional programs" that would be added to the list of other programs through which households can become categorically eligible for ESAP?

(d) If the answer to (c) is "yes," please provide a copy of all such Tier 2 Advice Letters or other submissions.

(e) Relative to the company's efforts to count the value of any housing subsidies as income in determining a household's income-eligibility for ESAP, for each of the four housing programs listed below, please state which of those programs the company considers as providing cash or monetary assistance directly to the household:

(i) public housing;

(ii) low-income housing tax credit;

(iii) section 8 housing voucher;

(iv) project based section 8.

Answer

(a) Yes, PG&E interprets 0.08-11-031, pp. 29 -31 as having authorized the IOUs to allow households participating in certain housing assistance programs to be categorically eligible for ESAP. However, per Decision 08-11-031, ordering paragraph 64, PG&E does not include Section 8 as one of the housing assistance programs that is categorically eligible for the ESA Program.

(b) n/a

(c) No, PG&E has not filed any Tier 2 Advice Letters or made any other filings regarding including "additional programs" for categorical eligibility.

(d) n/a

(e) PG&E's ESAP considers each of the programs listed to have a direct monetary value to the household.

NCLC Response to Southern California Gas Data Request
Questions 6, 7, 8, 9
ESAP/CARE

Question 6: What other states offer low-income multifamily energy retrofitting programs?

Answer 6: It is not clear exactly what is meant by "states" offering multifamily energy retrofitting programs.

Most states in the country provide energy efficiency services ("energy retrofitting") to low income multifamily properties through their Weatherization Assistance Program (WAP). According to the Department of Energy, the American Recovery and Reinvestment Act (ARRA) funded the completion of approximately 500,000 weatherized units through the summer of 20 11, and approximately 100,000 of those units were in multifamily buildings. However, NCLC does not have a state-by-state breakdown of where those multifamily units are located.

Assuming that the question is focused more on utility-funded energy efficiency work in multifamily buildings:

Massachusetts offers a low-income multifamily program, which has funding set-asides for low-income multifamily buildings and a designated "one-stop" process for those owners to apply. The program is administered by the state's investor owned utilities, in conjunction with local community action agencies. Existing multifamily buildings owned by public housing authorities are eligible for services, which are provided as grants that cover 100% of the costs, or as services delivered at no charge to the owner. Funding comes from the utilities.

NCLC understands that the following states also have utility-funded multifamily energy efficiency programs: New Jersey, New York, Iowa, Pennsylvania, Oregon, and Illinois.

The New Jersey Housing and Mortgage Finance Agency collaborates with PSE&G to reach the multifamily sector through the Residential Multifamily Housing Program. Building owners receive an on-site investment grade audit and can install measures that have a simple payback of 15 years or less. The projects are partially funded through grants, which can reduce the payback period by as many as 7 years but no less than 2 years. The remaining cost is covered by 0% on-bill financing.

NYSERDA runs the Energy \$mart Multifamily Performance Program which provides incentive payments for energy efficiency investments in existing multifamily buildings, as well as new construction projects. NYSERDA works with the owner to determine which upgrades will be implemented. There are separate programs run by ConEd and National Grid for which multifamily buildings are eligible.

The Iowa Finance Authority has partnered with Black Hills Energy, MidAmerican Energy and the Iowa Utility Association to create the Iowa Multifamily GREEN Initiative. The program provides rebates of up to 40% of covered measures as well affordable financing on the balance. Affordable housing developers and others can be eligible.

(f) Please see answer to 3-1 (b) above

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(iv) project based section 8.

Answer

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(b) n/a

(c) No, PG&E has not filed any Tier 2 Advice Letters or made any other filings regarding including "additional programs" for categorical eligibility.

(d) n/a

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NCLC Response to Southern California Gas Data Request
Questions 6, 7, 8, 9
ESAP/CARE

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The Iowa Finance Authority has partnered with Black Hills Energy, MidAmerican Energy and the Iowa Utility Association to create the Iowa Multifamily GREEN Initiative. The program provides rebates of up to 40% of covered measures as well affordable financing on the balance. Affordable housing developers and others can be eligible.

Pennsylvania's Housing Finance Authority operates the Smart Rehab Program which finances energy efficiency improvements for affordable, multi-family housing.

Oregon's housing finance agency-Oregon Housing and Community Services (OHCS) offers loans partially funded through the state's ratepayer-funded energy efficiency budget.

In Illinois, CNT Energy, with support from local utilities, runs the Energy Savers program, which has assisted over 5,000 multifamily units since its inception.

Other states that have provided support for energy efficiency services in multifamily housing but which may not have a formally designated or separate "multifamily program" include Colorado and Minnesota. NCLC believes that there may be a number of other states in this category ---providing energy efficiency services to multifamily housing, but not under a wholly distinct or separate "multifamily energy retrofitting program" ---but has not conducted a state-by-state survey.

Question 7: Who administers the low-income multifamily energy retrofitting programs in other states?

Answer 7: If those programs are operated under W A P, then the state agency that administers WAP administers those programs.

For utility programs, administration varies. In Massachusetts, the utilities fund and administer the program, in collaboration with community action agencies. In New Jersey, the program is a collaboration among PSE&G and the state's Housing and Mortgage Finance Agency. In New York, NYSERDA administers its program, and ConEd and National Grid administer their programs. In Iowa, the program is a collaboration among the Iowa Utilities Association, Iowa Finance Authority, and local utilities. In Pennsylvania and Oregon, the housing finance agencies serve as the primary administrators. In Illinois, CNT Energy, in collaboration with a group called CIC, primarily administer the Energy Savers program.

Question 8: Describe the program eligibility requirements of low-income multifamily energy retrofitting programs in other states.

Answer 8: In Massachusetts, 50% of the tenants must have incomes at or below 60% of median income, and the building must be owned or controlled by a public housing authority or non-profit entity. In New York, eligibility varies. The NYSERDA program appears to be limited to publicly-subsidized buildings or buildings in which at least 25% of the residents are at or below 80% of median income. The ConEd program is open to customers who are owners or managers of buildings with 5 75 units. The National Grid program is open to customers who are owners or tenants in buildings of 5 50 units. NCLC understands that the Iowa program is limited to certain Section 8 and low-income housing tax credit properties. NCLC understands that the Pennsylvania program is limited to buildings in which at least half the households have income below 60% of median. The Illinois Energy Savings program is open to multifamily owners in the greater Chicago area. NCLC does not have eligibility information for other states.

Question 9: How do other states fund their low-income multifamily energy retrofitting programs, e.g., ratepayer funding, state funding, federal funding?

9: To the extent any multifamily energy retrofitting is done under W AP, the funding comes from the federal program.

In Massachusetts, the funding for the program described in the answers to 6, 7 & 8 comes from ratepayer funding, the same ratepayer "systems benefits charge" that funds other utility energy efficiency expenditures.

NCLC understands that in New Jersey, the program is funded by PSE&G; that in New York, the programs are funded through the utilities, which collect a "systems benefit charge" from ratepayers; that in Iowa some of the funds come from the participating utilities; and that in Illinois, a portion of the Energy Savers program is funded by utilities. NCLC has not at this time determined the source of funding for the other utility-supported programs described in the answers to 6, 7 & 8.

THE EAST LOS ANGELES COMMUNITY UNION RESPONSE
TO CHPC DATA REQUEST

December 16, 2011

Ross Nakasone
Sustainable Housing Policy Coordinator
California Housing Partnership Corporation
415-433-6804 x310
RNakasone@chpc.net

Re: CHPC Data Request #1 for TELACU et al. in A1-05-017 etc. (ESAP/CARE)

Dear Mr. Nakasone:

As requested, please find the Response of TELACU et al. to CHPC's first set of data requests in the above-referenced proceeding.

James Hodges, for
The East Los Angeles Community Union (TELACU)
The Maravilla Foundation
The Association of California Community and Energy Services (ACCES)

Cc:
Michael Lizarraga, TELACU
Richard Villasenor, TELACU
Alex Sotomayor, Maravilla Foundation
Arleen Novotney, ACCES

TELACU Response to CHPC Data Request #1 for TELACU et al. in A.11-05-017 etc. (ESAP/CARE)

Request:

CHPC TELACU 1-1

TELACU et al.'s California Public Utilities Commission Energy Efficiency and Multifamily Housing pilot proposal (Multifamily Pilot Proposal) indicates that "[e]xisting energy efficiency programs have not been able to achieve their potential for penetration within the multifamily housing sector in California."¹ Please provide all data, studies or other information upon which TELACU et al. bases this opinion.

Potential for penetration of the multifamily housing sector is reference to the ability of current large-scale programs to achieve greater energy efficiency in this sector than what is currently available through any single program. For example, in 2010, the Energy Savings Assistance Program (ESA) treated the following numbers of multifamily units:

SCE 30,820;
SDG&E 10,380;
SoCalGas 27,066;
PG&E 21,822.

However, ESA's ability to reach large numbers of multifamily units and properties falls short of achieving full penetration of this sector as it does not guide multifamily owners or managers to participate in other utility or non-utility offerings in support of deeper energy savings.

Data for multifamily units treated is as reported by the 2011 (PY2010) Annual Reports for respective IOUs. Their complete reports can be found here:

<http://liob.org/resultsqy.cfm?doctypes=10>

CHPC TELACU 1-2

a) *What entity does TELACU et al. contemplate would be the administrator of the proposed Multifamily Pilot?*

The administrator is not yet determined.

Does TELACU et al. contemplate that the pilot will include a process to select the pilot administrator? If so, please describe that process, who will make the decision, using what criteria.

The selection process is not determined and will be subject to the oversight of the IOUs and/or Commission.

¹ TELACU, "California Public Utilities Commission Energy Efficiency and Multifamily Housing [pilot project proposal]," p. 1; as part of The Testimony of James Hodges on Behalf of The East Los Angeles Community Union (TELACU), the Association of California Community and Energy Services (ACCES), and the Maravilla Foundation, November 18, 2011.

TELACU Response to CHPC Data Request #1 for TELACU et al. in A.11-05-017 etc. (ESAP/CARE)

- b) *On Page 23, the Multifamily Pilot Proposal indicates that "TELACU will disseminate best practices...." Is it fair to read this statement as implying that TELACU be the pilot administrator?*

No. Administration of the pilot remains to be determined.

- c) *If the Multifamily Pilot proposes TELACU be the pilot administrator, what legal entity within TELACU would sign the contract for pilot administration? Is this a nonprofit or for-profit entity? If a for-profit entity, describe the ownership structure and list all parties with financial interests in the entity. What would be the entity's compensation? How was this amount calculated?*

The Multifamily Pilot Proposal does not designate a pilot administrator.

CHPC TELACU 1-3

- a) *What data will the Multifamily Housing Data Warehouse collect? How will such data be collected?*

The Multifamily Housing Data Warehouse (MHDW) will collect characteristics of property infrastructure, ownership, and residents. Definitive sources and collection activities are not yet determined.

- b) *What entity will collect the data (e.g. the Multifamily Energy Efficiency Manager)?*

Data collection activities will be administered by the appropriate entity as determined by the final pilot design.

- c) *Will data from all multifamily buildings in California be collected?*

Because this program will leverage the ESA Program, initial plans are to collect data for multifamily buildings within the IOU service territories. Further data collection is to be determined.

- i. *If not, what process will be used to determine what buildings to include (and not include) for data collection (e.g. only those buildings participating in the pilot)?*

Service accounts with a participating IOU will determine a property's inclusion for initial data collection activities.

- ii. *Will the building data included in the Warehouse be representative of the multifamily housing stock throughout California and/or the IOUs? If so, how will the entity collecting this data ensure that it is?*

Yes. Representation will be ensured through the inclusion of all multifamily properties within the specified territories.

TELACU Response to CHPC Data Request #1 for TELACU et al. in A.11-05-017 etc. (ESAP/CARE)

Profiling Data (Page 3). The proposal states that profiling data “assures that benefits are not apportioned unequitably to those already receiving assistance.” This statement requires greater clarification as to its meaning and intention. Is TELACU asserting that owners of federally assisted income restricted properties are more able or have a greater means to make investments in energy efficiency improvements solely because of the subsidies provided to preserve affordable housing? If yes, please provide all data, studies or other information upon which TELACU et al. bases this assertion.

TELACU makes no such assertion, but makes the following observation.

In December of 2010, CHPC submitted a \$240 million multifamily pilot proposal to PG&E and Commission Energy Division staff which would take ESAP funds and give them to benefit only owner/developers of assisted housing. A multifamily pilot for assisted housing reemerged in March 2011 under the sponsorship of the CPUC’s Energy Division in the form of the “CPUC Energy Division’s (ED) Principles for a Low Income Multifamily Housing Pilot” but no utility requested funds for such a pilot. At about the time of the ED pilot proposal, CHPC sponsored a bill, AB 1124, in the state legislature which would direct the CPUC to start a multifamily component of the ESA Program in a manner which would primarily benefit the owner/developers of deed restricted assisted housing.

On October 21, 2011, CHPC and the National Consumer Law Center (NCLC) led a Commission sponsored workshop in this proceeding entitled “Multifamily Sector Issues. Review of multifamily sector needs, proposals, and related operation and legal concerns.” The disingenuously stated goal of this workshop was “To understand the energy retrofit needs and opportunities of the multifamily rental sector, identify barriers and discuss possible changes to the current ESA Program.” However, the CHPC/NCLC multifamily workshop focused exclusively on the needs of the assisted housing sector and completely ignored the needs of the non-assisted housing sector. A barrage of presenters from various state and federal agencies described how ESAP funds should be leveraged with their own agencies’ funds to further benefit assisted housing developments.

Therefore, it is TELACU’s observation that CHPC and NCLC have demonstrated that there are substantial resources from a multitude of agencies available to owners of federally assisted income restricted properties. CHPC and NCLC have amply demonstrated therefore that perhaps such owners are in fact more able or have a greater means to make investments in energy efficiency.

TELACU opposes a “carve out” of ESAP funds exclusively for assisted housing owners who already have significantly more resources for energy efficiency as demonstrated by CHPC and NCLC. TELACU’s Multifamily Pilot Program will seek solutions to more effectively serve both non-assisted and assisted multifamily housing.

CHPC TELACU 1-4

TELACU Response to CHPC Data Request #1 for TELACU et al. in A.11-05-017 etc. (ESAP/CARE)

- a) *What entity/organization will employ and direct the Multifamily Energy Efficiency Manager?*

The selected program administrator will be responsible for direction of the Multifamily Energy Efficiency Manager.

- b) *Would there be more than one Manager? If so, how many are proposed for the Multifamily Pilot project, and what would be the geographic boundaries or other determinants of each manager's service area or territory?*

The number of managers is not yet determined.

- c) *In the last paragraph on Page 13, the Multifamily Pilot Proposal suggests that the Manager would come from current ESA Program administrators and contractors. If there are multiple Managers, would they operate similarly to service providers (i.e. all Managers offer similar services but have limited territories)?*

This is not yet determined. The pilot does plan to offer similar services across a range of building types and climate zones.

- d) *How will the Manager(s) be paid? In what line-item does this cost appear in the Multifamily Pilot Proposal budget and how was this cost determined?*

Manager(s) will be under contract with the pilot program administrator and will be paid from program funds, depending on the final disposition of a contract with the CPUC and/or IOUs.

Cost for Management and Administration is incorporated in the "Administration Cost" line of the proposed budget. This cost was determined based on previous experience managing contracts, the work load/depth of the project, and other considerations (estimated number of FTEs, etc.). The final detailed budget will not be known or detailed until a final pilot project is approved by the CPUC as the final pilot may include additional items not considered in the initial pilot design and/or components may be removed or diminished.

CHPC TELACU 1-5

- a) *What qualifications, training, skills and/or experience would be required of an individual to be a Manager?*

Qualification requirements for the Manager(s) will be worked out after the final scope of work for the pilot is determined. It is anticipated that requirements would include experience managing and implementing large-scale weatherization and energy efficiency programs with the depth and breadth of experience to conduct and complete the proposed pilot on time and on budget.

- b) *If training is required, how will the cost of such training be addressed?*

TELACU Response to CHPC Data Request #1 for TELACU et al. in A.11-05-017 etc. (ESAP/CARE)

Training requirements and associated costs will be determined when a Program Implementation Plan (PIP) is developed. Costs of training are typically an administrative cost; however, one requirement of the program may be that installation contractors be qualified to perform the work they will be hired to do with the training and certifications that may be similar or equal to BPI-Multifamily, HERSII, EUC for Multifamily, etc.

Programmatic training will be developed and provided once the pilot details are finalized based on the PIP. This type of training is provided by the program to the installation contractors.

c) *How will the quality of Manager(s) work be monitored and evaluated?*

The Manager(s) work will be monitored by the utility sponsors and evaluated by utilities and the CPUC.

CHPC TELACU 1-6

On Page 16, the Multifamily Pilot Proposal indicates that any participating owner that receives an investment grade audit but does not make the investment required to generate 20 percent energy savings will be charged back for the cost of the audit.

a) *Does the pilot proposal include a process to help owners determine whether or not they should ask for an investment grade audit, given the possibility for a charge back?*

Yes.

b) *What does/might that process look like?*

Property owners/managers will be provided with sufficient information to decide if an investment grade audits are practical for their properties. Audit coverage/charge back agreements will include protections based on property owners' willingness to pay for energy efficiency-related improvements.

CHPC TELACU 1-7

On Page 5 (in the first paragraph under Section C), the Multifamily Pilot Proposal indicates that the pilot's "requested funding level...brings additional and ongoing multifamily housing market intelligence for total cost equivalent to \$2,500 per unit served." How is this \$2,500 per unit figure derived and what are the specific measures that are assumed to be covered?

The \$2,500 cost per unit was derived by dividing the total pilot project costs by the estimated number of units to be serviced. Measures will vary by property (except for ESA Program prescriptive measures where appropriate) as the pilot approach will include all cost effective and feasible measures such as HVAC, water heating, water heating distribution systems, building envelope improvements, pool pumps, common area lighting, parking and security lighting, etc., whatever the audit determines is cost-effective and feasible.

TELACU Response to CHPC Data Request #1 for TELACU et al. in A.11-05-017 etc. (ESAP/CARE)

CHPC TELACU 1-8

On Page 6, the Pilot Project budget indicates \$1,095,000 for administration costs.

- a) *Please detail what costs are included in "Administration Costs" and detail the amount of those individual costs. Will costs of the Multifamily Energy Efficiency Manager be included in "Administration Costs"? If not, please detail the amount of the cost for the Energy Efficiency Manager(s) and describe how they will be paid for.*

Standard energy efficiency program administrative activities are included in the "Administration Costs" – oversight, management, fiscal management, contract management, etc. See Item 1-4d for the response to the manager cost.

- b) *Project Scope and Budget (Page 6). The budget states that an estimated 42 buildings will receive an energy audit at a cost of \$7,500 per building. How did TELACU et al. determine the \$7,500 average audit cost? What are the performance specifications for this audit? Please provide all data, studies or other information upon which TELACU et al. bases this average cost.*

At the present time EUC Multifamily programs are paying \$5,000 for a small MF audit (5 - 20 units) and \$10,000 for a large multifamily audit (greater than 20 units). As the actual number of each of these building types is not definite at this time, an average cost of \$7,500 ($\$5,000 + \$10,000/2 = \$7,500$) was chosen to ensure that a sufficient budget was available.

To streamline audit performance and rebate administration, audit performance specifications are set to those of the EUC Multifamily program available to the property.

C. Since the scope of Phase 1 includes up to 42 buildings, the budget suggest that each building in the pilot would receive an audit. Yet, for the ESA program, the budget states "N/A" for building energy audits. Will each building under the pilot program receive an audit, and if so how will the audit findings get incorporated in ESA program investments? If the audit recommends measures beyond the \$1,200 and \$3,400 limit for ESAP and EUC Budget measures, at what point will investments under the ESA and ECU Budgets programs end? Will all energy savings identified by the audit count towards performance requirements set for the EUC program even if the measures receive a contribution from the ESA program?

The expectation is that the cost of the energy audit would not come out of the ESA Program budget, hence, "N/A" for ESA-borne costs of building energy audits in Phase 1.

Each building will receive an initial energy assessment to determine the potential level of energy savings. The ESA Program will provide its list of prescriptive measures to ESA qualified households in a MF building. As these measures are provided to qualifying households at no cost, there would be no cost to the owner/manager of the building. The investment grade energy audit would provide total estimated project costs and list

TELACU Response to CHPC Data Request #1 for TELACU et al. in A.11-05-017 etc. (ESAP/CARE)

available incentives to illustrate added value for the property owner/manager. If there are costs that are above the incentive amounts the owners/managers would be expected to pay for those costs.

Measures installed by the ESA Program will count toward EUC performance requirements.

- c) *Does TELACU et al. have an estimate of how much (and/or what percentage) of energy efficiency costs a building owner/manager must pay to participate in the pilot? If so, how much/what percent will a building owner/manager pay?*

Building owner/manager cost to participate will vary based on the selected services and available rebates, ranging from no cost for only ESA, EE direct install and other fully-funded improvements, to a large percentage of the investment (actual cost less incentives/rebates) required for performance-based EUC retrofits

CHPC TELACU 1-9

In reference to the Overview of Budget Requested on Pages 5-6:

- a) *What is the rationale for setting the budget at \$21.25 million (\$6.5 million for ESAP and \$14.7 for EUC Budget)? Why was the budget not more or less than \$21 million?*

The budget was set at \$21.25 million based on estimated costs for a thorough and scalable pilot.

- b) *Project Scope and Budget (Page 6). The budget states that the unit cost under ESA program is \$1,200. This is approximately the same level of expenditures as under the current ESA program. How will the 850 units included in the ESA program achieve deeper energy upgrades and will the energy savings meet the energy reduction parameters in the California Strategic Plan?*

The pilot will utilize a "single point of contact" approach to guide property owners/managers to participate in ESA and additional energy efficiency programs/services. The 850 units receiving ESA treatment will achieve deeper energy upgrades through the additional, non-ESA measures which will be installed through property owner participation in energy efficiency programs and investments beyond ESA.

- c) *How was the \$1,200 per unit amount determined? Please provide all data, studies or other information upon which TELACU et al. bases this determination.*

The average cost per treated unit for the ESA Program is \$1,170 per unit as determined by the utilities. This was rounded to \$1,200 for discussion purposes.

- d) *Is the EUC Budget figure of \$3,400 per unit a cap on the cost of measures to be installed for each unit served through the pilot or an estimate/projection of what the per-unit cost for non-ESAP services will be?*

TELACU Response to CHPC Data Request #1 for TELACU et al. in A.11-05-017 etc. (ESAP/CARE)

The \$3,400 per unit is a cap on the incentives provided, not on the cost of measures installed or per-unit cost of non-ESAP services.

- e) *How was the \$3,400 per unit amount determined? Please provide all data, studies or other information upon which TELACU et al. bases this determination.*

The \$3,400 per unit amount was estimated by utilities in preliminary discussions to be a reasonable amount for Phase 1 of the pilot.

CHPC TELACU 1-10

TELACU has proposed this multifamily pilot in the ESAP Proceeding (A1-05-017 et al.), but the pilot's budget relies on \$14,727,500 in "EUC Budget" funding. Please describe from what source(s) the pilot will draw these funds.

- a) *How will these non-ESAP funds be budgeted to the pilot activities? For example, is TELACU making a similar proposal in a different Commission proceeding or has/will TELACU (or some other entity) simply negotiated with EUC program administrators?*

The proposed EUC budget is for discussion purposes and is not yet determined.

TELACU makes no claims on the EUC budget. Currently the EUC budget is available on a first-come, first-served basis. Since it is the CPUC's and the IOUs' desire to utilize EUC funds for multifamily retrofits, it is assumed that if this pilot will be able to access almost \$15 million in EUC funding along with EUC funds available from cities and counties.

- b) *While the proposal will "utilize existing incentive programs on a first-come, first-serve basis as they currently exist," and thus "not impact existing programs" (Page 19), how will non-measure pilot costs such as the audits, Phase 2, Phase 4, and administrative costs be budgeted through the "EUC Budget" (Page 6)?*

Non-measure pilot costs are necessary for administration of the pilot and must be allocated by participating utilities from appropriate EE funding sources not limited to the EUC program.

CHPC TELACU 1-11

- a) *In reference to the last paragraph on Page 16 of the pilot proposal, how much funding does the pilot propose for a Furnace Repair Program and hot water systems in individual tenant units?*

The pilot does not propose an amount. This will be determined based on the expected level of service for these units as experienced within current ESA Repair and Replacement programs.

TELACU Response to CHPC Data Request #1 for TELACU et al. in A.11-05-017 etc. (ESAP/CARE)

- b) *How was this amount of funding determined? Please provide all data, studies or other information upon which TELACU et al. bases this determination.*

Please see above.

CHPC TELACU 1-12

- a) *Especially in instances when the ESA Program contractor does not possess "the necessary certifications and qualifications [to] deliver further measures" (Page 4), would ESAP and non-ESAP services be delivered during a single entry into a tenants unit?*

That level of detail has not been determined at this time and will be a component of the PIP.

- b) *If not, how will the pilot address the challenge of making multiple entries into a tenant's unit to deliver ESAP and non-ESAP services at different points in time?*

That level of detail has not been determined at this time and will be a component of the PIP. Every effort will be considered to reduce the impact on tenants.

CHPC TELACU 1-13

- a) *In those instances when a building owner agrees to an investment grade audit, at what point during the process would the audit occur?*

The investment grade energy audit is the third step in the process, before any work is done. The first step being outreach and EE potential assessment and the second being the discussion of the findings of the EE potential assessment with the Multifamily Energy Efficiency Manager and property owners/managers.

- b) *What energy savings improvements does the pilot propose be credited to the 20 percent energy savings targets? More specifically, will energy savings generated by ESAP measures be counted in reaching the 20 percent energy savings target?*

Energy savings from all measures, including ESAP measures, will be counted towards achieving the 20 percent goal.

CHPC TELACU 1-14

- a) *What buildings will be eligible for participation in the proposed pilot? Those with 66 percent of units qualified for ESA Program services (Page 14) or only 25 percent of units (Page 23)?*

Phase 1 (Small Scale Pilot) will require buildings with at least 25% of households that are ESA eligible. Impact of this eligibility criteria will be examined in Phase 2 (Evaluation and Modification), with the refined eligibility criteria to be implemented in Phase 3 (Large Scale Pilot).

- b) *How were the building eligibility criteria determined?*

TELACU Response to CHPC Data Request #1 for TELACU et al. in A.11-05-017 etc. (ESAP/CARE)

Building eligibility criteria was set at a level intended to minimize program outreach costs required to collect sufficient data on the various multifamily building types. Data collection efforts in Phase 1 will inform the final recommended building eligibility threshold to be employed at larger scale in Phase 3.

- c) *What was the rationale for setting the percentage threshold of qualifying units to make the building eligible for the pilot?*

Rationale is based on providing services to all multifamily developments, not only to ESA-only or assisted housing developments, as the pilot's funding will come from both low-income and non-low-income sources.

CHPC TELACU 1-15

On Page 24, the Multifamily Pilot Proposal indicates the pilot administrator will contact property owner/manages for enrollment in the pilot.

- a) *How/which will buildings be selected for participation in the pilot?*

Marketing and selection criteria will be developed in the PIP phase.

- b) *Can building owner/managers apply to participate in the pilot? If yes, what will the process be for soliciting applications?*

Building owners/managers will be able to apply to participate and the process for soliciting applications will be developed in the PIP phase.

- c) *Who will decide which buildings get to participate and on what basis?*

In the first phase we are looking at buildings in specific climate zones and building types. Participation will be on a first come/first serve basis for each climate zone and building type. Final selection will be done to ensure a good mix of situations for evaluation in the pilot.

The third phase will be open to all climate zones and MF building types.

CHPC TELACU 1-16

How does the pilot propose the Manager will determine which households in a building are ESAP eligible? Will the manager rely on door-to-door, unit-by-unit outreach?

In an effort to streamline determination of ESAP eligibility, the Manager will coordinate outreach based on a combination of unit-by-unit outreach and other strategies appropriate to each property based on general characteristics including concentration of potentially eligible residents. A review of whole building enrollment requirements will be included in the interim evaluation report and/or the final report.

TELACU Response to CHPC Data Request #1 for TELACU et al. in A.11-05-017 etc. (ESAP/CARE)

CHPC TELACU 1-17

How will the pilot address buildings in which 80 percent or more are ESAP-eligible?

These buildings will be addressed according to current the ESAP policies and procedures.

CHPC TELACU 1-18

In measuring program success (Page 20) and reduction of costs to property owner/managers (Page 29), will/should the pilot attempt to quantify soft costs (e.g. hassle factor) to property owner/managers? If so, how will that be measured?

All aspects of the pilot delivery method will be analyzed to identify ways to simplify the approach, reduce tenant disturbance, and reduce other “hassle” factors. Quantification of soft costs will occur through process and impact evaluation within the pilot.

CHPC TELACU 1-19

In reference to the table on Pages 21-22:

- a) *What was the rationale for setting the number of units to be treated in Phase 1 and 3 at 1,700 and 6,800 respectively? Are these all unique units or are some of these the same unit counted twice because they are expected to receive services through both ESAP and EUC?*

There is nothing specific for setting the number of units as the levels indicated in the pilot proposal. They seem like a reasonable number 1) to accomplish in a short amount of time, and 2) a sufficient number of units and buildings to be able to make reasonable pilot study.

They are unique numbers and will not be double or triple counted.

- b) *Project Scope and Budget (Page 6). The budget states that 1,700 units (up to 42 buildings) will be included in Phase 1. Of these, 850 are included under the ESA program budget and 850 under EUC program. Based on this accounting, it appears that buildings/units participating under the ESA program would not be participating in the EUC program. How is the ESA program integrated with the EUC? What number of the units does TELACU expect to receive both types of services?*

The split is for budgeting purposes. Buildings that receive ESA services are eligible to receive EUC services. The actual number of each type of incentive will vary based upon household eligibility for the ESA Program and property owner/manager participation in the EUC Program.

- c) *How were the unit targets determined for each of the criteria (i.e. small/medium/large, height, systems, climate zones, vintage etc.) in the table? Please provide all data, studies or other information upon which TELACU et al. bases this determination.*

TELACU Response to CHPC Data Request #1 for TELACU et al. in A.11-05-017 etc. (ESAP/CARE)

The pilot aims to serve all multifamily properties which meet the proposed eligibility criteria. The pilot recognizes that a segment of eligible multifamily properties includes those currently participating in housing assistance programs. Our data indicate that assisted multifamily housing units account for about 15% of all multifamily housing units:

	Housing Units	% of Total Multifamily Units
Assisted Housing Type:		
Low-Income Housing Tax Credits*	264,100	8.3%
<i>For-Profit & Non-Profit</i>	194,000	6.1%
<i>Local Government Developed</i>	70,100	2.2%
Public Housing (PHA)**	42,284	1.3%
HUD Housing**	156,000	4.9%
USDA Sec 515 Rural*	20,000	0.6%
Total Assisted Units	482,384	15.2%
Total Multifamily Units***	3,132,443	22.9% of all Housing Units

Sources: * Matt Schwartz CHPC testimony at CPUC
 **HUD San Francisco & Los Angeles Offices, www.hud.gov/local/
 ***2010 US Census Table DP04

Special characteristics of assisted multifamily housing make targeting percentages difficult to achieve closely, i.e. by reaching all of the proposed sampling of multifamily properties in Phase 1, the pilot would likely encounter entire buildings of assisted units, and therefore would likely exceed a proportional 15% target for assisted units served. The 25% target includes this leeway and ensures sufficient representation of assisted multifamily housing within the overall multifamily housing market. In the course of the program planning and design period, this target percentage may be adjusted according to current multifamily data for the IOU territories to be served.

g) *How will the types of unit/buildings be determined for Phase 3?*

Building/unit types will be determined based on characteristics befitting deeper energy savings through available energy efficiency potential and owner investment.

SAN DIEGO GAS AND ELECTRIC RESPONSE TO CHPC DATA REQUEST

ESAP/CARE CHPC_SDG&E_#1
SDG&E – A.11_05-20
CHPC Data Request # 1 Dated September 19, 2011
SDG&E Response to Question 1- 3 a-e
Submitted: October 11, 2011

CHPC SDG&E 1-3:

- a) Regarding Attachment A-4 of SDG&E's Application, please provide and describe the data sources and method SDG&E employed to develop the estimates of customers eligible by dwelling type and owner/renter status as well as all relevant documentation.
- b) Does SDG&E develop separate estimates, apart from the overall estimate of eligible households, for the number of multifamily buildings with ESAP-eligible households and number of income-eligible units within those buildings? If so, please provide the most recent estimates and provide and describe the data sources and method as well as all relevant documentation.
- c) For PYs 2008 through 2011, please provide the number of customers eligible and treated organized similarly to Attachment A-4 (i.e. broken down by services, renter/owner status and housing type).
- d) For each year 2008 to 2010, please provide the number of multifamily buildings, and the number of units in those buildings, that received ESAP services.
- e) And for PYs 2008 through 2011, please provide and describe the data sources and method SDG&E employed to determine the number of customers eligible by dwelling type and owner/renter status.

SDG&E Response:

Response to Question 1-a

In Section 12.3.2 of Decision (D.) 08-11-031, the Commission adopted the methodology to determine the eligible population for the 2009-2011 program cycle. In its Application (A. 11-05-020), SDG&E proposed revisions to the Commission's adopted methodology for the 2012-014 program cycle, consistent with revisions proposed by the other IOUs. SDG&E's proposed revisions used the Commission adopted method in D.08-11-031, and adjusted to reflect revisions to the unwillingness and LIHEAP calculations. Section B-3 of the Prepared Direct Testimony of Sandra Williams on Behalf of San Diego Gas & Electric Company's Energy Savings Assistance Program Plans and Budgets for Program Years 2012, 2013, and 2014 (A. 11-05-020) provides a complete description on how SDG&E derived its estimates for the Energy Savings Assistance Program's eligible population.

The Commission's methodology adopted in D. 08-11-031 uses the estimated number of income eligible households based on the estimates submitted in the utilities' annual Estimated Eligibility Updates. The data contained in the Eligibility Updates are calculated and derived by the utilities' consultant, Athens Research. The consultant also provides an estimate of the eligible population by dwelling type and occupancy status. From this, SDG&E can use the data to determine percentages of customers by dwelling type and occupancy status. For example in program year 2012, the eligible population was determined to be 356,482 and the data obtained from Athens Research indicated that

ESAP/CARE CHPC_SDG&E_#1
SDG&E – A.11_05-20
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SDG&E Response to Question 1- 3 a-e
Submitted: October 11, 2011

26.44% of eligible homeowners live in single family homes. Therefore, for single family homeowners, the customers eligible were determined to be 94,241. Please note that the eligible population used in SDG&E's Attachment A-4 is the eligible population provided by Athens Research for 2011 escalated by 1% and does not reflect the other adjustments shown in the Direct Testimony of Sandra Williams at page SW-14 e.g., customers treated 2002-2010, the estimated unwilling population, LIHEAP, etc.

A copy of D. 08-11-031 is provided below for your reference.


D. 08-11-031.pdf

Response to Question 1-b

SDG&E does not develop separate estimates of multi-family buildings, or the number of potential income eligible customers within those units. SDG&E works with its Outreach Contractors to market to all potentially eligible customers resulting in a significant number of multi-family units being served each year by the Energy Savings Assistance Program. For example from January 2011 through August 2011, approximately 51 percent of SDG&E's homes served through the Energy Savings Assistance Program were multi-family dwellings.

Response to Question 1-c

The Commission-adopted reporting requirement format in program year 2008 is different from the adopted reporting requirement format for program years 2009-2011.

The estimated eligible LIEE population for program year 2008 was 345,281. SDG&E has attached herein Table TA-3 of its LIEE program Annual Summary and Technical Appendix of 2008 Results which reflects the homes treated by housing type, heat source, and occupancy status.


Table TA3
PY2008.pdf

SDG&E has also include the appropriate tables below for program years 2009 through 2011 to reflect the number of homes treated by housing type, heat source, and occupancy.


Table 8 PY2009.pdf


Atth A4 PY2010
PY2011.pdf

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Response to Question 1-d

SDG&E does not track individual multi-family buildings within its database. Housing type is tracked for every enrollment and the number of multi-family units served from 2008-2010 is presented below. During the 2008-2010 timeframe, multi-family homes served through SDG&E's Energy Savings Assistance Program represented 54% of the total homes served during that three year period.

Year	Dwelling Type	Units Served
2008	Multi-Family	12,983
2009	Multi-Family	10,942
2010	Multi-Family	10,383

Response to Question 1-e

As described in question 3a above, the eligibility estimates used to determine the estimated number of eligible households is based on the estimates submitted in the utilities' annual Estimated Eligibility Update. The data contained in the Eligibility Updates are calculated and derived by the utilities' consultant, Athens Research. The consultant also provides an estimate of the eligible population by dwelling type and occupancy status. SDG&E used the data to determine percentages of customers by dwelling type and occupancy status.

Response Provided by: Sandra Williams

ESAP/CARE CHPC_SDG&E_#1
SDG&E – A.11_05-20
CHPC Data Request # 1 Dated September 19, 2011
SDG&E Response to Question 1- 5
Submitted: October 5, 2011

CHPC SDG&E 1-5:

For each climate zone in SDG&E's service area, please provide a list of eligible measures for the 2009-1011 LIEE cycle and 2012-2014 ESAP cycle. For each eligible measure, indicate what household type (i.e. rental/owner and single-family/multifamily/mobile) is eligible to receive the measure. For those instances when a measure is eligible for one (or more) household type(s) but ineligible for another (or others), please provide a complete explanation why the measure is ineligible for the particular household type. [For example (these may not be accurate and are for illustrative purposes), water heater replacement is eligible for owners but not renters or envelope sealing is eligible for single-family and mobile home households, but ineligible for multifamily households. Why?] The below table may be a helpful template.

SDG&E Measures by Climate Zone and household type								
Climate Zone	Measure	Owner			Renter			For each of the household types ineligible for the measure, the explanation why the measure is ineligible
		SF	MF	Mobile	SF	MF	Mobile	
[#]	[measure 'name']	[✓ to indicate "eligible"]	[* or [blank] to indicate ineligible]					

SDG&E Response:

The Energy Savings Assistance Program measures authorized for SDG&E's 2009-2011 program are included in Attachment F3 of D. 08-11-031. Please refer to Section 8 of D. 08-11-031 to review the criteria adopted by the Commission to determine which measures it authorized to be included in the program.

SDG&E's proposed measures for the 2012-2014 program cycle by climate zone and housing type are included in Attach A-6 of its Application A. 11-05-020. As directed by the Commission, SDG&E utilized the criteria adopted in D. 08-11-031 and the results of the Draft 2009 Load Impact Study to determine which measures would be proposed for the 2012-2014 program cycle.

In D. 08-11-031, at page 39, the Commission affirmed its position that utility ratepayers should not assume the costs of replacing certain measures such as furnace and water heater in rental units because Section 1941.1 of the California Civil Code requires

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landlords to provide space heating and water heating to their tenants. SDG&E continues to comply with the Commission's determination on the issue of replacing furnaces and water heaters in rental units.

Response Provided by: Yvette Vazquez

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SDG&E Response to Question 1- 12
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CHPC SDG&E 1-12:

Please explain SDG&E's existing customer enrollment process. What specific activities make up the cost of customer enrollment (e.g. does this include securing permission to access buildings and securing owner permission to install measures in rental units)? If there are differences in enrollment processes between the household types (i.e. rental/owner and single-family/multifamily/mobile), please explain what those differences are.

SDG&E Response:

SDG&E's existing enrollment process begins with a lead. Leads are prescreened for eligibility by the Outreach and Assessment contractor. If customers are determined to be eligible during the prescreening, an in-home assessment appointment is scheduled with the customer. During the in-home assessment visit, the Outreach Specialist determines customer eligibility based on the California Statewide Policies and Procedures manual, *Section 2: Customers and Structural Eligibility*. The attached file outlines the process.



ESAP Customer
Enrollment process.doc

Specific activities that make up the cost for enrollment include how the customer was income qualified (full-income, categorical, or self – certified), in-home assessment performed, and energy education provided. The costs of securing property owner waivers are included in the above fees.

The differences in the enrollment process for renters and owners include the following:

- Contacting landlords or property manager prior to contacting renters residing on master metered units/mobile home parks.
- Obtaining Property Owner Waivers and other renter appliance waivers or forms prior to installation of measures except where the installation of services and measures do not directly affect the condition and/or structure.
- Collecting proof of home ownership from owners prior to providing service.

There are no enrollment cost differences by dwelling type. Any rental unit regardless of dwelling type that receives contractor installed measures other than compact fluorescent lights and education require a signed Property Owner Waiver.

Response Provided by: Sandra Williams

**ESAP/CARE CHPC_SDG&E_#1
SDG&E – A.11_05-20
CHPC Data Request # 1 Dated September 19, 2011
SDG&E Response to Question 1- 14
Submitted: October 3, 2011**

CHPC SDG&E 1-14:

a) What barriers has SDG&E identified that make enrollment of households difficult? Do the enrollment barriers vary by household type? How many households have not been served due to the unwillingness of landlords?

b) Are units unserved due to unwillingness of landlords calculated in the number of eligible households?

Response to Question 14-a

There are a number of barriers that SDG&E's Energy Savings Assistance Program encounters during the program enrollment process. These include language, ethnic, and cultural barriers. In addition there are immigration status issues, perceived value proposition on behalf of the landlord and program participants in the rental community.

Enrollment barriers are aligned with owner/rental status as opposed to dwelling type.

SDG&E does not track how many households have not been served due to the unwillingness of landlords.

Response to Question 14-b

The unwillingness of landlords to participate in SDG&E's Energy Savings Assistance Program is not calculated in the estimated eligible households number projected for 2012-2014.

Response Provided by: Sandra Williams

ESAP/CARE CHPC_SDG&E_#1
SDG&E – A.11_05-20
CHPC Data Request # 1 Dated September 19, 2011
SDG&E Response to Question 1- 16
Submitted: October 5, 2011

CHPC SDG&E 1-16:

In testimony on behalf of SDG&E, Sandra Williams asserts that SDG&E utilizes a "wholehouse" approach.³ Please define "whole house" as used in SDG&E's application and how SDG&E's ESA Program comports with that definition.

³ San Diego Gas & Electric, Sandra Williams, "Prepared Direct Testimony of Sandra Williams on Behalf of San Diego Gas & Electric Company's Energy Savings Assistance Program Plans and Budgets for Program Years, 2012, 2013 and 2014," SW-2 and SW-9, May 16, 2011.

SDG&E Response:

In D. 08-11-031, the Commission adopted a "whole house approach" for the 2009-2011 Energy Savings Assistance Program which focuses on making the state's entire housing stock energy efficient, rather than small measures in a scattering of homes on a piecemeal basis. The Decision cited the definition adopted in the Commission's California Energy Efficiency Strategic Plan (at p. 17) which defined the whole house approach as follows:

"The overall objective [of the approach] is to reach all existing homes and maximize their energy efficiency potential through a delivery of a comprehensive package of cost-effective, whole-house energy efficiency retrofit measures – including building shell upgrades, high-efficiency HVAC units, emerging deep energy reduction initiatives – with comprehensive audits, installation services and attractive financing. This can be achieved through parallel and coordinated initiatives among utility programs, private market actors, and state and local government policies."

SDG&E's whole-house approach utilizes contractors and community based organizations to provide home weatherization, energy efficient appliances and energy education services to customers participating in the Energy Savings Assistance Program.

The program outreach contractors assess the needs of the house to identify all feasible measures that are eligible for installation in accordance with the Statewide Policies and Procedures Manual. The assessment is provided to program staff to send to installation contractors to complete the work.

SDG&E also has contracts with two contractors that receive federal energy efficiency funds and have been able to expand their outreach efforts through the California Department of Community Services and Development (CSD) programs. This has allowed additional leveraging across the Energy Savings Assistance Programs and CSD programs as these agencies have funding available to provide more measures and services to customers. Through this collaboration customers are able to receive as many measures

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as possible between the programs, while increasing transparency and reducing the number of customer home visits.

In addition, SDG&E works with the community based organization Rebuilding Together San Diego to leverage the non-profit agency's home renovation efforts with the Energy Savings Assistance Program energy efficient upgrades for qualified homeowners.

SDG&E's Energy Savings Assistance Program also works with the Energy Efficiency Mobile Home program. Contractors performing services for Energy Efficiency and the Energy Savings Assistance Program coordinate the installation of measures and services. This integration effort offers qualified customers to receive all measures and services at no cost under both programs while also minimizing the likelihood of duplicative efforts and cost between Energy Efficiency and the Energy Savings Assistance Program.

Response Provided by: Sandra Williams

- a) A minimal list of some of the barriers to enrollment includes: language, distrust of government agencies, disbelief that the program is free, paperwork (including income documentation and property owner waivers), and lack of time. PG&E would assume that some enrollment barriers vary by housing type, depending on the type of barrier. PG&E does not know how many households have not been served due to the unwillingness of landlords.
- b) As PG&E does not know the number of households that have not been served due to the unwillingness of landlords, these units have not been specifically calculated in the number of eligible households.

Exhibit	32
CPUC Proceeding	A.11-05-017 et al.
Sponsor/Witness	Commission
Date Ident.	2/15/2012
Recd.	2/15/2012
Kimberly H. Kim Administrative Law Judge	

Southern California Edison
ESAP-CARE 2012-2014 A.11-05-017

DATA REQUEST SET A.11-05-017 EEGA1766/ED-SCE-001

To: ENERGY DIVISION

Prepared by: Flor Tolley

Title: M1

Dated: 12/20/2011

Question 03:

Does SCE anticipate any over or unspent cooling center funds at the conclusion of the current 2009- 2011 budget cycle? If yes, please provide the over/under spent amount and identify the impacted cooling center expense categories.

Response to Question 03:

The 2011 Cool Center program expenses are still being finalized, however, SCE anticipates that the Cool Center Program will be underspent by approximately \$650,777 for the 2009-2011 program cycle (see attachment). SCE forecasts that Program Management will be underspent by \$252,356. This is a result of not having an SCE manager over the Cool Center program for the majority of 2009, and having fewer SCE staff support the Cool Center program through 2009 and 2010. With increased SCE staff support in 2011, SCE was able to operate 22 centers. SCE forecasts Marketing will be underspent by \$30,095. The Measurement and Evaluation budget was \$80,000 for the 2009-2011 budget cycle, and will be overspent by approximately \$1,241. This was a result of comprehensive program evaluations conducted in order to identify and improve program efficiencies. Contractor Operations will be underspent by about \$396,566 primarily because only 16 centers operated in 2009 and 12 in 2010, lower than the anticipated 20 Cool Centers for each program year. The Cool Center program operated with 22 centers in 2011.

SCE - Cool Centers Plan/Actual/Variance

2009 - 2011	Plan	Actuals	Variance
Program Management	\$ 606,000	\$ 353,644	\$ 252,356
Marketing	\$ 50,000	\$ 19,905	\$ 30,095
M & E	\$ 80,000	\$ 81,241	\$ (1,241)
Contractor Ops	\$ 1,575,000	\$ 1,205,434	\$ 369,566
Total Cool Center Expenses	\$ 2,311,000	\$ 1,660,223	\$ 650,777

Southern California Edison
ESAP-CARE 2012-2014 A.11-05-017
DATA REQUEST SET A.11-05-017 EEGA1766/ED-SCE-001
To: ENERGY DIVISION
Prepared by: Flor Tolley
Title: M1
Dated: 12/20/2011

Question 06:

Specify the cost associated with each item listed in the description of expenditure category of SCE' proposed Cool Center Program Budgets for 2012-2014, A. 11-05-xxx Table VII-5.

a. Please define miscellaneous expenses as outlined in the operations category in A. 11-05-017 Table VII-5.

b. Please explain the difference between management oversight in the *operations* category and management oversight in the *management* category in A. 11-05-017 Table VII-5.

Response to Question 06:

SCE requests program operation expenses (according to the categories included in the attachment) from agencies that submit proposals to operate an SCE Cool Center program. These operational components are in alignment with the Description of operation expenditures includes in SCE's proposed Cool Center Program Budgets for 2012-2014, A. 11-05-017 Table VII-5, including administration, oversight, transportation, and other program miscellaneous expenses.

The Marketing, Management and Measurement and Evaluation expenses included below are SCE incurred expenses only.

a. Please define miscellaneous expenses as outlined in the operations category in A.11-05-017 Table VII-5.

Miscellaneous expenses include any other cost incurred in the operation of a Cool Center outside of the above Operations cost categories. Examples of miscellaneous expenses include office supplies, utilities, insurance, or other costs that would not have been incurred by the agency but for the operation of the Cool Center. All reimbursable expenses must be approved by SCE.

b. Please explain the difference between management oversight in the operations category and management oversight in the management category in A. 11-05-017.

Management oversight in the operations category refers to the labor performed by the Cool Center itself and the management oversight in the management category refers to SCE oversight.

**SCE Cool Centers - Associated Costs by
Category 2012-14**

Operations	
Ramp Up	\$ 52,000
Coordinator Labor	\$ 874,000
Admin Labor	\$ 442,000
Driver Labor	\$ 5,000
Activities	\$ 34,000
Outreach	\$ 42,000
Education	\$ 15,000
Transportation Vehicle	\$ 3,000
Bus Passes	\$ 45,000
Employee Mileage	\$ 21,000
Refreshments	\$ 91,000
Wrap Up	\$ 26,000
Operations Total	\$ 1,650,000

Marketing	
Development and Production of Materials	\$ 60,000
Operations Total	\$ 60,000

Management	
SCE Labor	\$ 525,000
SCE Travel	\$ 40,000
Cool Center Training	\$ 6,000
Operations Total	\$ 571,000

Measurement and Evaluation	
SCE Labor	\$ 25,000
3rd Party Evaluation	\$ 5,000
Operations Total	\$ 30,000

GRAND TOTAL \$ 2,311,000

EM&V Individual Consultants-Data Request
EEGA SDG&E 1768 Data Request Dated December 20, 2011
Low Income SDG&E DR 122011
Requestor: Energy Division (Syreeta Gibbs)
SDG&E Response to Q3:
Date Submitted: January 5, 2012

Question 3:

Does SDG&E's anticipate any over or unspent cooling center funds at the conclusion of the current 2009- 2011 budget cycle? If yes, please provide the over/under spent amount and identify the impacted cooling center expense categories.

SDGE Response:

SDG&E's Cool Zone program will be under spent for the program cycle by \$52,235. The funding levels and associated expenses for the program cycle 2009-2011 are listed below.

PY 2009-2011	Budgeted	Actual Expenses	Difference
Fan Purchase	\$78,174	\$53,902	\$24,272
San Diego Transit passes to Cool Zone sites	\$20,700	\$9,000	\$11,700
Staffing to support Cool Zone program Jun through Sept	\$41,611	\$36,293	\$5,318
Fan delivery to low-income seniors and disabled	\$21,515	\$10,570	\$10,945
Total	\$162,000	\$109,765	\$52,235

Person Responsible for the Response: Irma DePratti

¹ As directed in D. 05-04-052, at p. 57, SDG&E's Cool Zone program is funded through its CARE outreach budget.

A.11-05-017 et al. KK2/lil

R.06-04-010 / A. 11-05-020 SDG&E
EM&V Individual Consultants-Data Request
EEGA SDG&E 1768 Data Request Dated December 20, 2011
Low Income SDG&E DR 122011
Requestor: Energy Division (Syreeta Gibbs)
SDG&E Response to Question 6:
Date Submitted: January 5, 2011

Question 6:

Provide an itemized list of proposed expenses by cooling center location in SDG&E's service territory for the 2012-2014 budget cycle.

SDGE Response:

SDG&E has allocated the following proposed budget to San Diego County Aging and Independence Services' Cool Zone program for PY2012-2014.

Category	Budgeted for PY2012-2014
Fan Purchase	\$86,000
San Diego Transit passes to Cool Zone sites	\$22,500
Staffing to support Cool Zone program Jun through Sept	\$45,856
Fan delivery to low-income seniors and disabled	\$23,000
Total	\$177,356

Person Responsible for the Response: Irma DePratti

QUESTION 6

Provide an itemized list of proposed expenses by cooling center location in PG&E's service territory for the 2012-2014 budget cycle.

ANSWER 6

PG&E's proposed cooling center expenses for the 2012-2014 budget cycle is by expense categories not by cooling center location as not all cooling centers will request funds, and PG&E can't predict the limit of funds that will be requested. PG&E provides grants to aid in the operation of pre-existing city and county run cooling centers only.

- Direct Funding: local agencies - in their discretion - could use the grants toward the operation of their cooling centers for staff labor, transportation, beverages, snacks, games, awareness materials, etc.
- Outreach: PG&E expenses to educate customers on heat preparedness, and to publicize the location and accessibility of cooling center locations within PG&E's service area. These expenses include outreach events, bill inserts, collateral materials and printing, website development and support, and toll-free line development and support.
- General Program Administration: PG&E staff labor and travel expense to administrate the program

Activities Description	2012 Proposed	2013 Proposed	2014 Proposed
Direct funding (grants) to cooling centers.	\$150,000	\$154,000	\$159,000
Outreach: events; bill insert; collateral materials and printing; website development and support; and toll-free line development and support.	\$65,000	\$67,000	\$69,000
General program administration: staff labor and travel for program management	\$14,000	\$15,000	\$15,000
Total Proposed Budget	\$229,000	\$236,000	\$243,000